No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
1	Transport Action Network (TAN)	General	While this consultation is welcome, we have some serious concerns about the quality of the data and assessments proposed to be used within the Integrated Sustainability Appraisal (ISA). As it stands the ISA is not robust, is out of date on a number of issues, and will not aid the decision making process in the way that it should. This needs to be resolved before it is used in the development of the draft Transport Strategy.	Multiple	Data updated for ISA report. All assessments undertaken using methodologies as per policy, legislation and guidance.
2	Transport Action Network (TAN)	5.4.11	"Effective transport planning can play a role in encouraging active transport choices (e.g. walking and cycling) as well as improve accessibility to sports and recreation facilities. Continued traffic growth without adequate provision for pedestrian and cyclists' facilities is unsustainable." There are two issues with this statement: 1. Active travel is not a side or recreation issue – it can enable access to jobs and services which otherwise might be out of each to deprived communities because of the cost of transport. Additionally, the advent of e-bikes makes commuting longer distances by bike perfectly feasible now, significantly expanding the role this form of transport could play in accessing all manner of jobs and services. This expanded role needs to be acknowledged here. 2. Continued traffic growth is unsustainable and this sentence needs removing or rewording. The Committee on Climate Change has highlighted the need for a 10% modal switch from private cars to walking, cycling and public transport1 in its net-zero scenario. However, this was a conservative figure and likely to be an underestimate of the level of action required. For example, other research by Transport for Quality for life, commissioned by Friends of the Earth, suggests that even with a ban on sales of new conventional vehicles by 2030, levels of traffic reduction of 20 – 60% will be needed by then, depending on how fast action is taken to decarbonise in other areas2.	General	Baseline and future trends section updated for ISA report.
3	Transport Action Network (TAN)	5.5.2	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 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.	Community Safety	The term 'accident' is still used by DfT, PHE and within the EEH databank which have been key sources of data. Limited information to support that accidents Following a discussion with EEH we've decided to keep the term accident.
4	Transport Action Network (TAN)	5.7.4	It would appear rather perverse to use the cost of fuel as an economic benefit derived from people visiting the countryside. The number of cars accessing rural areas creates significant pressures on country lanes, roadside verges and increases demand for car parking in sensitive landscapes. It results in a multitude of other disbenefits including making it less attractive and safe to cycle or walk in the countryside, increasing noise and air pollution and undermining public transport services both directly and indirectly. The cost of fuel should be seen as a negative cost, not a positive, scaled up to represent the true impact on society.	Natural Capital and Ecosystem Services	Inherent in the NC approach. No action taken.
5	Transport Action Network (TAN)	5.7.14	Connectivity needs to apply to people as well as nature. Often people's connectivity is significantly reduced or inconvenienced by new transport infrastructure, particularly new roads. Footpaths and bridleways and even minor roads, can be sent on long diversions to find a single crossing point, provided for several routes. These diversions are often less than pleasant being close to the busy (and hence noisy) new roads. This is often deemed acceptable by decision makers as the number of people using these routes can be relatively low in comparison to the numbers on the new roads. However, the long term and cumulative impact is to create a countryside that becomes more and more fragmented for people, further undermining its 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.	General	Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and effects.
6	Transport Action Network (TAN)	5.8.13	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 likelihood of local people using non-car modes as well as reducing recreational and tourism opportunities.	General	Baseline and future trends section updated for ISA report.
7	Transport Action Network (TAN)	5.8.14	While the opportunities listed identify improving access to the countryside as important and having potential, this should be clarified to mean by active travel and public transport, not by any means, given the huge negatives that arise from excessive car access.	Landscape and Townscape	Baseline and future trends section updated for ISA report.
8	Transport Action Network (TAN)	5.11.13	While it is correct that there are likely to be more cars with a greater population if no action is taken to reduce road traffic, it should not be just taken as a given, especially as there needs to be a cut in traffic levels if the net-zero carbon target by 2050 is to be met. The ISA should be highlighting that without traffic reduction it is very unlikely the UK will meet its net-zero carbon target and hence should be discouraging any action that results in traffic growth, rather than just commenting that more people will mean more cars.	Air Quality	Baseline and future trends section updated for ISA report.
9	Transport Action Network (TAN)	5.11.14	This section completely fails to mention the opportunities that arise from traffic reduction, such as reduced air pollution.	General	Baseline and future trends section updated for ISA report.
10	Transport Action Network (TAN)	5.12.5	This section seems inexplicably out of date, given the Court of Appeal judgement on Heathrow is referenced in paragraph 5.11.8 (under air quality). Yet no mention of it is made here and its implications for future decision making, particularly with regards to climate and the legally binding target of net-zero carbon by 2050. The old 80% target is still quoted as the legal target for carbon, even though that is no longer the case and hasn't been since June 2019. This appears rather odd given that these have serious implications for carbon emissions and the sort of strategy that will be required to help deliver the new target.	Climate Change and Greenhouse Gases	Baseline and future trends section updated for ISA report.

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11	Transport Action Network (TAN)	5.12.9	No mention is made of need to reduce traffic in order to meet the net-zero carbon target by 2050. This is an important issue and opportunity. In addition, as we have signed up to Paris, it is not so much a question of "the amount of greenhouse gases the population chooses to emit" as stated here, but the levels we can afford to emit to stay within the UK's carbon budget and its international commitments. While the lack of a baseline for regional carbon issues might be an issue, there are some tools to estimate this, and this ISA should be using them to indicate progress on carbon reduction. To this end it needs to provide much better indications of the true impacts that large infrastructure projects, particularly new roads, will have on the region's carbon budget. There is no mention of the need to consider wider carbon emissions resulting from certain transport interventions – e.g. low density car based sprawl, linked to new roads, can increase emissions significantly and illustrate how the carbon impacts of a new road extend far beyond the road itself.	Climate Change and Greenhouse Gases	The Transport Strategy recognises the implications of the COA's Heathrow judgment and the impacts that will have on the provision of new infrastructure on the region. It commits to supporting a reduction in the number of single occupancy car trips and, through the development of the transport hierarchy, recognises the need to act to reduce reliance on the private car. EEH has engaged the ECI at Oxford University to develop regionally specific decarbonisation pathways (including BAU) that highlight actions need to support decarbonising transport in the Heartland. The Pathways have been modelled and assessed using the NISMOD Transport model, using a population growth scenario determined by planned housing and employment development within the region. Because of the scale of planned growth and population increase, the modelled pathways show a growth in the number of trips and over all trip distance in the region – though lower than a BAU scenario. The modal assumes some increase in road capacity over the 2020-2050 period but does not account for the embedded construction emissions associated with each individual scheme. This level of detail would not be practical and is outside the scope of this work.
12	Transport Action Network (TAN)	5.12.10	The opportunities listed 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 example (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 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)	5.13.9	There is no mention of new development needing to make more efficient use of land – fewer, smaller roads, higher density developments on the back of high quality mass transit would minimise land use, loss of agricultural land and climate emissions. While it could be said to be covered by the term resource efficiency, that term is too vague or broad and development impacts are rarely considered under this heading. Tackling climate change and the style of development could present a big opportunity to safeguarding the countryside and should be explicitly mentioned.	General	Outside remit of TS - more development/spatial planning related; however aspects related to place-making strengthened for ISA report. The strategy recognises the role of the transport system in enabling sustainable development and aims to provide the long-term policy framework that can support local authorities with the delivery of current Local Plan proposals, by providing the framework within which to plan for the sustainable development of communities in the longer-term. The strategy also comments on continued change in travel behaviour that can create opportunities to repurpose our existing infrastructure in favour of active travel modes, but this must be done in a way that enables a sustainable future for urban areas and their communities.
14	Transport Action Network (TAN)	5.14.7	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)	Sustainability Appraisal Framework	Population and equalities – the wording in this section is too vague and fails to highlight the current discrimination against those with age and poverty characteristics. These groups 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 greater.	General	Baseline and future trends section updated for ISA report.
16	Transport Action Network (TAN)	Sustainability Appraisal Framework	Health – the current sustainability objective is weak, particularly: better access to public transport and supporting active travel. Better access is no good if public transport isn't improved, while supporting active travel is meaningless without significant prioritisation of investment into infrastructure to make this happen. It should something like: through better access to high quality, frequent public transport and high quality active travel provision…	Health	Sustainability objectives updated for ISA report
17	Transport Action Network (TAN)	Sustainability Appraisal Framework	Community Safety – It is wrong to talk of accidents, not crashes as this gives a sense that road users are not responsible for their and others' safety. While it covers safety at a high level, it really needs to specifically address the issues of vulnerable road users and road danger (perceived or otherwise) which denies so many of a choice of transport, or any transport at all. This aspect should be a major focus of this objective as otherwise significant community safety issues will not be addressed which will prevent the shift to active transport that is needed for both health and climate change reasons.	Community Safety	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.
18	Transport Action Network (TAN)	Sustainability Appraisal Framework	Landscape and townscape – There is no mention of the severance caused by infrastructure, particularly new roads. It is a serious issue and should be part of the sustainability objective. The following could be appended to the current objective: and the rural connectivity for people walking, cycling and riding horses.	General	Sustainability objectives updated for ISA report
19	Transport Action Network (TAN)	Sustainability Appraisal Framework	Climate Change – There is no mention of the need to follow a pathway to the net-zero 2050 target within the sustainability objective. As assessed here, the strategy could reduce emissions and meet its objective by 2050 but completely fail to keep within carbon budget, which would mean it had failed in its obligations under the Paris Agreement. The third bullet under issues identified should state 'charging and electrical' or just 'electrical' infrastructure, so it's not mistaken to include new roads. There should be other issues listed here as well: • including the need for modal shift and traffic reduction if the UK is going to keep within its carbon budget. • the fact that building more roads will increase traffic and emissions thus taking us in the wrong direction, compromising our ability to meet our carbon target, or forcing other sectors to take even faster and more severe cuts which they may not be able to deliver.	General	Comment applies to TS not ISA, the former having to abide by targets, the latter assessing only. See response to comment 11.
20	Transport Action Network (TAN)	Next Steps	From table 7.1, we are concerned that the consultation period looks like it might be only 4 or 6 weeks long. For such an important strategy document as this and particularly as the consultation period extends over the summer holidays, it should be a minimum of 12 weeks. Given that the consultation won't end until mid-October, producing the final ISA, alongside the final transport strategy isn't credible in October and probably not even in November, if responses to the consultation are to be properly considered. Separately, we have been assured that the consultation on the draft Transport Strategy will be a minimum of 12 weeks, starting 14 July. Given that there may continue to be great uncertainty around travel and meeting restrictions at that time which could hinder community organisations getting together, that either the consultation is extended beyond 12 weeks, or it is launched at a later date. Even if things are starting to return to normal by July, people may well be still getting over a lot of upheaval and even loss at this point. Equally restrictions could be extended and the current crisis on-going	General	Programme error in table, updated for ISA report.
21	Transport Action Network (TAN)	Appendix C	Population and Equalities Under this section there is no mention of active travel which is important for age and for those in poverty. The emphasis on the sole reliance on public transport is wrong. From DfT Action Plan (2012) and Hallam Uni research (2017) there is no mention of active travel, cycling in particular, which is potentially even more appropriate as it is free to use – people just need access to a bike and lock. NPPF talks of prioritising walking and cycling, but this is not explained here. Research by Campaign for Better Transport3 on the impact of the Local Sustainable Transport Fund highlights it's more than just buses.	General	Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities. Appendix updated for ISA report

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22	Transport Action Network (TAN)	Appendix C	Air Quality, Climate Change and Greenhouse Gases Surprisingly this section doesn't mention the latest legal target for carbon – net-zero by 2050, despite having mentioned the Heathrow Court of Appeal Judgement earlier in the document. This section needs updating and the whole ISA revisiting to address the implications of a more stretching target and the need to follow a pathway to net-zero with interim targets. Given the ISA has quoted the Heathrow judgement and that the implications of that judgement could have far reaching consequences for other National Policy Statements (NPS), it is surprising that the ISA quotes the National Networks NPS (NNNPS) which states that: "it is very unlikely that the impact of a road project will, in isolation,affect the ability of Government to meet its carbon reduction plan targets." Given the NNNPS was published in 2014 before Paris and the net-zero 2050 target, it is clearly out of date. Also, given that transport emissions are heading in the wrong direction and are a significant and rising proportion of total emissions, it is highly unlikely that the assumption within the NNNPS is correct. This section also fails to mention the Committee on Climate Change's 2019 progress report which says that the Government has delivered just 1 policy action out of 25 recommended by the Committee in 2018 and surface transport emissions have risen over the past 5 years4.	General	Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities. Appendix updated for ISA report
23	Cowley Area Transport Group		1.Do you agree with the policy context and baseline information presented? No. The introduction to the Scoping Report makes no mention of the travel to work areas of Cambridge, Milton Keynes and Oxford which have been shown to be highly localised – undermining any case for the Expressway.	General	Falls outside the remit of the ISA, which focusses on the Transport Strategy.
24	Cowley Area Transport Group		2.Are there any additional sustainability issues which should be identified? Yes. The Government's favoured 2050 deadline for a carbon neutral deadline for the UK is not adequate in relation to the UN	Climate Change and Greenhouse Gases	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.
25	Cowley Area Transport Group		3.Do you agree with sustainability objectives? No. You cannot make trunk road building sustainable.	General	Comment noted.
26	Chiltern Society	5.8.1	Para 5.8.1 notes that all or part of three AONBs lie within the EEH area. Given the importance and statutory status of these areas, the Management Plans for these AONBs are, we submit, documents relevant to the Transport Strategy, and therefore should have been reviewed as a part of the evidence gathering exercise for this Report, and listed in Appendix C. The (recently updated) Chilterns AONB Management Plan 2019-2024 contains useful analyses of the key issues by topic, which could also have broader relevance to other rural and semi-rural areas within the EEH area. This heightened attention to the Statutory Management Plans for the AONBs should then feed through to greater consideration and weight being given within the Sustainability Appraisal to the potential impacts on them.	Landscape and Townscape	Appendix updated for ISA report
27	Chiltern Society	5.8.12	The potential impacts on the Chilterns AONB could be particularly significant, including those arising from the major growth likely along the Oxford-Cambridge arc, such as extra pressures from commuting and other through-traffic, and recreational visitors. There is a real opportunity for this Transport Strategy to take the strategic view on appropriate conservation and development across the whole AONB referred to in 5.8.12; the need is just as vital, and potential benefits as great, irrespective of whether the Chilterns are granted National Park status (since, of course, both AONBs and National Parks share the same highest level of protection in relation to many aspects of development (NPPF para 172)).	Landscape and Townscape	Recommendations made for TS
28	Chiltern Society		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 direct effects on vegetation, and also give rise to nitrogen deposition. This should be included in the biodiversity, natural capital and / or air quality sections.	Multiple	Baseline and future trends section updated for ISA report.
29	Chiltern Society		Within the Water Environment section (5.10), it should be recorded that the area's water bodies include a number of (spring-fed) chalk streams, which are an internationally rare habitat, and are at particular risk from pollution and excessive groundwater extraction. Increased development puts further pressure on water resources, risking further diminution of groundwater levels and thus stream flow.	Water Environment	Baseline and future trends section updated for ISA report.
30	Chiltern Society	Table 6.1	a) For Biodiversity, it is important that it is not just Protected Species and Habitats and "special" biodiversity that is enhanced, but wider and more widespread biodiversity. Perhaps the following amended wording of the Objective might better convey this: "To protect and enhance protected habitats and species, and create coherent ecological networks and ecosystem functionality across the region, contributing to biodiversity net gain"? b) For Landscape and Townscape, we request that the Objective is expanded to read "To conserve and enhance the quality of the region's designated and other landscapes, and townscape character" to make clear the additional status and qualities of AONBs. c) For noise and vibration, we request that the Objective is expanded to read "To reduce exposure to transport related noise and vibration, including noise pollution, annoyance, and impacts on tranquillity" to recognise this particular aspect.	Multiple	Sustainability objectives updated for ISA report
31	Historic England	2.1.3	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 advice on the historic environment and so are surprised that do not appear to have been consulted.	General	Observation noted.
32	Historic England	2.1.4	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 key principle relating to the environment.	General	Recommendations made for TS
33	Historic England	General	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 be undertaken throughout the preparation of the Strategy/Plan etc.	General	Observation noted.
34	Historic England	Appendix C	We note that Appendix C of the Scoping Report sets out a list of relevant Plans, Policies and Programmes. Page 20 and 21 relate to the historic environment and we note that you have quoted some sections of the NPPF (paras 170 and 172). However, these paragraphs relate more to the natural environment than the historic environment. We suggest that you refer to paras 184 – 202 of the NPPF that relate specifically to the historic environment.	Historic Environment	Appendix updated for ISA report
35	Historic England	Appendix C2	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 Space). However, it would seem that only a few SPDs are referenced. For greater consistency we suggest that you either reference all relevant SPDs or none.	Historic Environment	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 removed.

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
36	Historic England	Appendix C	When considering key plans and programmes, we also recommend the inclusion and consideration of the following: International/European ⬚ UNESCO World Heritage Convention ⬚ European Landscape Convention ⬚ The Convention for the Protection of the Architectural Heritage of Europe ⬚ The European Convention on the Protection of Archaeological Heritage National ⬚ Planning (Listed Buildings & Conservation Areas) Act 1990 ⬚ Ancient Monuments & Archaeological Areas Act 1979 ⬚ Marine and Coastal Areas Access Act 2009 ⬚Government's statement on the Historic Environment ⬚ National Planning Policy Statement for Networks ⬚ National Planning Practice Guidance Local ⬚ Local Plans – we note that you have included many of these which is welcomed. ⬚ Historic Environment Record ⬚ AONB Management Plans ⬚ Heritage/Conservation Strategies ⬚ Other Strategies (e.g. cultural or tourism) ⬚ Conservation Area Character Appraisals and Management Plans ⬚ Listed building Heritage Partnership Agreements	Historic Environment	Appendix updated for ISA report
37	Historic England	Table 4.1	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 historical assets to heritage assets and undesignated to non-designated (in accordance 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.	Historic Environment	Text updated for the ISA report
38	Historic England	5.9.3	All designated heritage assets (World Heritage Sites, Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens and Registered Battlefields) within the area should be identified. We note that paragraph 5.9.3 lists the number of certain designated heritage assets as does Table 5.4. However, this is a very basic summary and more detail could be given e.g. by county, or by particular types of assets where particular themes/concentrations can be identified.	Historic Environment	Regional summary provided to reflect strategic nature of strategy and assessment.
39	Historic England	Appendix B	We note that you have mapped some of these assets at figures B8 in Appendix B. We are however concerned that this mapping does not include Conservations Areas. In addition, it would appear that the maps to not cover the full geographical extent of the area - for example some of the areas in South Cambs around Wimpole would appear to be missing from the mapping. Please can you double check the geographical extent of these maps and ensure full coverage. Mapping of assets does help to provide a greater indication of their distribution and highlight sensitive areas. However, we would stress that assessing the potential impact of development on the significance of heritage assets requires more than a simple mapping of the location of those assets and identification of those assets on or in proximity to potential sites. Our Historic England Advice Note 3 sets out a sequential approach to assessing the impact on significance.	Historic Environment	Regional summary provided to reflect strategic nature of strategy and assessment. Recommendations in ISA report reflect need to undertake more detailed assessment as particular proposals are considered/developed.
40	Historic England	Appendix B	We also would expect non-designated heritage assets to be identified. These include, but are not confined to, locally listed buildings. In addition to the above, we would expect reference to currently unknown heritage assets, particularly sites of historic and archaeological interest. The unidentified heritage assets of the area should be acknowledged and outlined in this section. Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes. Historic Landscape Characterisation should also be referenced as should heritage as risk. For Heritage at Risk, Historic England's National Heritage at Risk Register includes Grade II listed places of worship provided that they are used six or more times a year for worship.	Historic Environment	Baseline, trends and recommendations updated for ISA report.
41	Historic England	Appendix B	We note that you have mapped Landscape Character Areas in Appendix B at figure B.7 which is welcomed. Landscape Character Assessment is the process of identifying and describing variation in the character of the landscape. It seeks to identify and explain the unique combination of elements and features (characteristics) that make landscapes distinctive. This process results in the production of a Landscape Character Assessment.	Multiple	Observation noted.
42	Historic England	General	We suggest that you also refer to Historic Landscape Characterisation data in your assessment. We refer you to our website which includes some helpful guidance in this regard and sets out some of the differences between this and Landscape Character Areas. https://historicengland.org.uk/research/methods/characterisation/historic-landscape-characterisation/ It is our view that Historic Landscape Characterisation (HLC) provides exactly the sort of landscape-scale information which should assist an SEA; giving perspective on the relative character of the wider area into which alterations to the character of any particular part might be weighed. HLC is an inherently comprehensive and generalising approach, all about providing context to the understanding of the particular and about the management of change everywhere. We consider that the HLC approach is applicable and highly relevant to informing SEA. In fact, all of the commissioned County-level HLCs were designed to inform strategic level planning. (It should also be noted that HLC can be undertaken at any scale, including coarser or finer grained work - HLC is also a principled approach which can be, and is being, undertaken at a range of scales). The lack of detailed Historic Landscape Characterisation for the county of Cambridgeshire and Luton should ideally be addressed as part of this high level, strategic evidence gathering to inform the growth aspirations for the Oxford Cambridge Arc. This work might be commissioned in collaboration with Cambridge County Council and the other local authorities in the area and Luton Borough Council. Similarly there may also be a case for more detailed work in Northamptonshire. We recommend early discussion with Local Authorities in this regard.	Multiple	Baseline, trends and recommendations updated for ISA report.
43	Historic England	Table 5.4	We welcome the identification of all conservation areas within the study area at table 5.4 on page 33. It might also be useful to identify where Conservation Area Appraisal and Management Plans have not yet been completed in order to identify any gaps in the evidence base. Again we would recommend early discussion with Local Authorities in this regard as there may need to be further work to address any deficiencies. We would also recommend drawing on in-house knowledge from local authorities and other local knowledge as well as referencing existing Heritage Impact Assessments and other heritage related studies across the study area. Some of these may form part of various Local Plan evidence bases or may have been submitted by developers. In particular we would highlight: 1. the Greensand Country Landscape Partnership's 'Parklands Audit' (Alison Farmer Associates, April 2016), available here: http://greensandcountry.com/wp-content/uploads/2017/06/Greensand-Country-Landscape-Partnership-Historic-Parklands-Audit.pdf 2. "A short review of the archaeology of the Oxfordshire parishes of Didcot (north of the railway line), Appleford-on-Thames, Long Wittenham, Clifton Hampden, Berinsfield, Dorchester-on-Thames, Warborough and Shillingford, Brightwell-cum-Sotwell, and Little Wittenham" commissioned from Oxford Archaeology by Historic England in 2016. Historic England's Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Landscape Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.	Historic Environment	Regional summary provided to reflect strategic nature of strategy and assessment.
44	Historic England	5.9.8	In paragraph 5.9.8 we suggest that historic assets is replaced with heritage assets. The final bullet point on page 34 applies to Conservation Areas, Registered Parks and Gardens, World Heritage Sites and non-designated heritage assets just as much as listed buildings and scheduled monuments that are already identified in this bullet point.	Historic Environment	Baseline, trends and recommendations updated for ISA report.

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45	Historic England	Page 49	We note the key sustainability issues for the historic environment identified on page 49 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, WHSs etc., not just listed buildings and scheduled monuments.	Historic Environment	Baseline, trends and recommendations updated for ISA report.
46	Historic England	General	We would suggest that the starting point for considering Key Sustainability Issues for the Historic Environment should include: ⬚ Conserving 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 or erosion of landscape/seascape/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 49 of the report). In the section on landscape and townscape reference could also be made to historic landscape characterisation.	Multiple	Baseline, trends and recommendations updated for ISA report.
47	Historic England	Page 49	We note the sustainability objective for the historic environment on page 49 of the Scoping Report. At present, the objective is quite short. We would suggest changing protect to conserve, in line with the terminology in the NPPF. Alternative environmental, social and economic objectives that could also be used are set out at paragraph 2.11 of our advice note on Sustainability Appraisals. It may be helpful to develop decision making criteria to assist in the assessment process. Examples of criteria that could be included as listed at paragraph 2.12 of our advice note on Sustainability Appraisals.	Historic Environment	Sustainability objectives updated for ISA report
48	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 Appraisals.	Historic Environment	Indicators used for assessment of strategic corridors. Indicators forming part of TS monitoring.
49	Historic England	General	Consideration of Opportunities 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 sustainable 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 ISA report and remain strategic in nature.
50	Historic England	General	Method for Generation of Alternatives 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 distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base.	Historic Environment	The draft TS does not identify development sites or projects. Therefore this level of detail is not be possible in the ISA. Where spatial aspects (broad corridors which are being assessed in order to help inform a future programme of connectivity studies) have been assessed, proximity and density of assets inform the assessment and selection of options.
51	Historic England	General	Archaeology Scoping and evaluation of archaeological and landscape impacts needs to be an iterative process where existing sources (HER's cartographic etc. and research frameworks e.g. https://archaeologydataservice.ac.uk/researchframeworks/eastmidlands/wiki/) are consulted, work is done to explore those questions and new questions asked (including lidar, aerial survey, geophysical survey, field walking, deposit modelling see our new guidance https://historicengland.org.uk/imagesbooks/publications/deposit-modelling-and-archaeology/heag272-deposit-modelling-and-archaeology/, trial trenching). These techniques should be used to model risk and build a robust approach to understanding that through any project so the greater heritage and project delivery risks are targeted first so they can inform minimisation and timely mitigation)	Historic Environment	It is not possible to assess to this level of detail with no specific project proposals.
52	Historic England	General	We would remind you that the National Planning Policy Framework (para 32) is very clear that, in terms of sustainable development, harm to the historic environment should be avoided in the first instance and wherever possible alternative options which reduce or eliminate such impacts should be pursued. It is important that due weight is given in the assessment of alternative proposals to the potential harm to the 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 distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base. This is preferred to the application of a standard proximity test (e.g. is the site within a set distance of a heritage asset) as it avoids misleading results (Our Historic England Advice Note 3 sets out a sequential approach to assessing the impact on significance).	Historic Environment	Given the lack of specified sites for development, this request cannot be accommodated. Instead a sensitivity test has been undertaken on the 'zones' identified as possibly requiring transport solutions, so that the selection of alternatives is informed by heritage information.
53	Historic England	General	We would suggest that you avoid summing the scores indicating how each proposal performs against the criteria to give an aggregate contribution to each relevant SA objective since such an approach may inadvertently mask 'showstoppers' by effectively averaging out the scores. There needs to be some mechanism of identifying where an impact is so great that the proposal should not be progressed.	Historic Environment	No individual proposals are made as part of the TS. Policies and 'corridors' have been sensitivity tested so that decisions can be made as to tweak or favour alternatives. This includes heritage information.
54	Historic England		Historic England strongly advises that the local authority conservation teams and archaeological advisors are closely involved throughout the preparation of the assessment of this evidence. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (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	This is an individual project level scope of requirements, which cannot be accommodated at the strategic level.
55	Historic England		Other Assessment methodologies Finally we would add that whilst this assessment process is a vital part of the assessment of the transport strategy more detailed assessment of particular aspects may be necessary going forward for particular schemes. For example, Historic England would expect to see the completion of a Heritage Impact Assessment as part of the evidence base for certain transport proposals likely to have an impact on the significance of heritage assets (including development within the setting of the heritage assets). We would be happy to provide further advice in this regard if and where this may be necessary as part of the evidence base for transport proposals. This opinion is based on the information provided by you in the document dated March 2020 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the strategy which is the subject to consultation, and which may, despite the assessment, have adverse effects on the historic environment.	Historic Environment	Observation noted.
56	National Trust	Section 4 and Appendix C	The National Trust considers that the policy context summarised in section 4 of the Scoping Report and detailed in Appendix C is comprehensive and thorough. It may, however, be necessary to update the report to take account of recent Government decisions, including the East-West Rail northern corridor announcement and Highways England's decision to pause work on the Expressway. In addition, Robert Jenrick's statement on planning for the future proposes up to four new development corporations in or around Bedford, St Neots/Sandy, Cambourne and Cambridge, which are all in the East of England. Taken together these announcements could shift the Arc's geographic focus to the east.	Multiple	Baseline and appendix updated for ISA report
57	National Trust		The Scoping Report recognises that the pattern of future growth is 'not anticipated to be uniform across the region and that the development of East West Rail will be transformative across the Heartland' (paragraphs 5.3.11and 5.3.11.) Some further elaboration of sub-regional variation in the potential effects of the Strategy would be helpful.	General	Provided at a strategic level to the extent possible with the policies and through assessment of high level broad corridors in the development of a programme of connectivity studies.
58	National Trust		In the Trust's view the baseline information presented in section 5 and in the figures in Appendix B covers all the relevant topics and appears to be of an appropriate level of detail for a Scoping Report. However, the Trust wishes to make the following detailed points:	General	Observation noted.
59	National Trust	5.8.8	The list of major tourist attractions in paragraph 5.8.8 might be regarded as partial in that it excludes National Trust attractions, such as Stowe, Waddesdon Manor, Wimpole Hall and others, which for completeness should be included on the list.	Landscape and Townscape	Baseline and appendix updated for ISA report
60	National Trust	5.2	The Trust welcomes the inclusion of Wimpole and Eversden Woods SAC and Wicken Fen Ramsar within the scope of the ISA (listed in Table 5.2 of the report). For your information around the Wicken Fen SAC is the 'Wicken Fen Vision Area'. The Wicken Fen reserve area extends over some 250 ha of land and the long term management strategy for the Vision Area extends across an area of approximately 5,300 ha. The management of this extended area for nature conservation will help to alleviate visitor pressure on Wicken Fen SSSI.	Multiple	Comment noted.
61	National Trust	Appendix B	For ease of reference it would be useful if Figures B.2 to B.16 in Appendix B included the boundary of the EEH Region.	General	Figures for scoping report not updated.

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
62	National Trust	Appendix B	The Trust is concerned to ensure that Figures B.8 to B.12, showing historic environment baseline information, should include all of the Trust's heritage assets, as shown on the map contained in Appendix 1 of this document.Contained with the Historic England responses.	General	Figures for scoping report not updated.
63	National Trust	Appendix B	Whilst there is a case to be made for mapping baseline information relating to areas adjacent to but outside the EEH Region it is unclear why it is necessary to include such a large geographical area on the figures in Appendix B. Consequently, these figures include a lot of extraneous information which is not required for the Integrated Sustainability Assessment.	General	Figures for scoping report not updated.
64	National Trust	5.7.5	In relation to natural capital and ecosystem services the Scoping Report refers to the emerging Ox-Cam Local Natural Capital Plan at paragraph 5.7.5 noting that 'As part of the EA's Oxford to Cambridge Local Natural Capital Plan, a baseline assessment of natural capital is being completed across the arc at the local planning authority level. The outputs of this assessment will include a fine scale map of the dominant habitats and land cover across the majority of the EEH region'. The Trust considers that this section would benefit from the inclusion of further detail. The recent budget announcement for a Nature Recovery Network Fund to deliver the Nature Recovery Networks which will be introduced via the Environment Bill Nature Recovery Network Fund will deliver habitat and species restoration and recovery, alongside wider natural capital benefits. Local Nature Partnerships will be responsible for leading the delivery of biodiversity net gain and the National Trust supports this approach. A net gain target which would simply maintain and enhance the provision of ecosystem services from the region's natural capital and contribute to environmental net gain (page 49) is not consistent with the direction of travel in terms of national and local planning policy nor does it adequately address the urgent need to mitigate the effects of climate change and accelerate 'nature recovery'.	Natural Capital and Ecosystem Services	Baseline and appendix updated for ISA report
65	National Trust	5.4.13 and 5.9.9	The National Trust has identified an important sustainability issue which it considers should be included in paragraph 5.4.13 of the Health section and paragraph 5.9.9 of the Historic Environment section. Through the Transport Strategy there is the opportunity to enhance connectivity between urban areas and the countryside, including heritage assets, especially by non-car modes, so as to promote tourism (with its economic benefits) and community wellbeing (bringing social benefits).	Multiple	Baseline, trends and opportunities updated for ISA report
66	National Trust		The National Trust is pleased to see the inclusion of biodiversity and environmental net gain within the ISA scoping report. However, in order to meet the Government's ambition in the 25 Year Environment Plan, to leave the environment in a better state than we found it, how this is implemented will be vital. The impact that transport infrastructure can have on the environment is significant, and as such the National Trust believes that nationally significant infrastructure should be included in the mandatory biodiversity net gain scheme. Furthermore, in order to have a proper impact, biodiversity net gain schemes need to be ambitious. The 10% net gain target that will be mandated by the Government through the Environment Bill is the minimum level assessed as required to achieve at least no net loss to biodiversity, however aiming for 10% may not even deliver a gain. It is also important that biodiversity and environmental gain habitats should be secured permanently, as the damage done through development and construction cannot be undone.	Biodiversity	Recommendations made for TS
67	National Trust	table 6.1	From an overview of the proposed sustainability objectives in Table 6.1 it is apparent that the social strand of sustainability is not strongly reflected. For instance, under the health, landscape and townscape and historic environment topics there should be some recognition in the sustainability objectives of the importance to community wellbeing of providing improved connectivity between towns and visitor attractions in the countryside using sustainable modes of transport. In the Trust's view providing greater access to greenspace and reconnecting people to nature should be an important sustainability objective of the Transport Strategy.	Multiple	Sustainability objectives updated for ISA report
68	National Trust	Table 4.1	The National Trust supports the key message from the review identified inTable 4.1 of the need to "provide greater access to greenspace, to help reconnect people to nature" but this need does not translate into the sustainability objectives which focus on quality of place. Recent research with Derby University1 exploring peoples' connections with nature found importance in everyday nature. Simply tuning in and noticing the simple things in nature is a crucial step in developing a closer relationship with nature. And that closer relationship is critical to improving wellbeing, but also to saving nature and the environment.	General	Recommendations made for TS
69	National Trust	Table 4.1	While new transport routes can provide greater access to the natural environment, permeability for people and wildlife across new transport routes is also paramount in enabling everyday nature experiences.	General	Recommendations made for TS
70	National Trust		In relation to the natural capital and ecosystem services the Trust considers that the sustainability objective should reflect the emerging consensus across the EEH Region and set clear and ambitious targets for biodiversity and nature recovery. For example, the objective might reflect Natural Cambridgeshire's 'Doubling Nature'2 ambition, linked to a measurable 20% net gain in biodiversity.	Natural Capital and Ecosystem Services	Recommendations made for TS, however, a percentage of net gain was not specified.
71	National Trust	Section 6	In section 6 the National Trust would like to have seen some explanation as tohow the Integrated Sustainability Appraisal is to be carried out and the findings presented. For instance, it is not clear how alternatives are to be assessed and compared nor what measures or indicators are to be used to determinewhether the sustainability objectives are likely to be met by each alternative.	General	Methodology set out in the ISA report
72	National Trust	General	It would also have been useful if the Scoping Report had set out the intended format of the Integrated Sustainability Appraisal.	General	Observation noted.
73	Chilterns Conservation Board (CCB)	Appendix C	CCB's key policy document in discharging its role is its Management Plan, a statutory document under the Countryside and Rights of Way Act 2010. The Act requires the CCB to prepare and publish a plan that sets out the policies for the management of the Chilterns; and carry out a formal review at least every five years. The latest review has recently been completed and formally adopted as a statutory document covering 13 Local Authorities. As such we feel it is of great significance and request that the CCB Management Plan should be included in Appendix C and factored into all the relevant sections of the ISA	Multiple	Baseline and appendix updated for ISA report
74	Chilterns Conservation Board (CCB)	5.8.12	Para 5.8.12 seems to imply that the Chilterns will become a more significant ISA consideration if designated as a National Park, which would mean 'greater recognition' and 'create the potential for a more strategic view to be taken'. This is wrong: protected landscapes in England are all afforded the same degree of statutory importance and protection, be they AONBs or National Parks. (NPPF para 172. While the designation of a Chilterns National Park might enhance the resources and powers available for their conservation, it would not move the Chilterns into a higher category of importance. We request that this be corrected.	Landscape and Townscape	Baseline updated for the ISA report
75	Chilterns Conservation Board (CCB)	Underlying Principles	2.1 The Chiltern Hills make up an estimated 15% of the EEH area. They also cover about two-thirds of the EEH's boundary with London and the South-East, and thus of the transport links between the two regions. Their size and location are both critical and highly sensitive to strategic transport issues, within and beyond the EEH area. 2.2 Their character and accessibility make the Chllterns a uniquely important asset in terms of leisure, health and wellbeing and biodiversity for the benefit of existing and future residents. For the quality of life of these residents, they are just as crucial a part of the EEH area's infrastructure as its roads and business parks. EEH's Transport Strategy should therefore view the Chilterns as a positive asset, to be cultivated and enhanced, rather than as a constraint to be recognized and worked around. This is consistent with the welcome tone of para 3.7.2 of the consultation report. 2.3 If the Chilterns are regarded as a positive asset in this way, a different set of transport assumptions needs to be applied to them: that the conservation and exploitation of this asset means departing from the prevailing objective of maximising connectivity toward a more nuanced approach, which balances the need for access with the conservation of the very asset which generates that need. First, this will require an approach which may inhibit unlimited individual access in favour of a targeted, structured and multi-modal approach; and second, it will require the impact on the Chilterns to be a determining issue in the planning of new infrastructure from the very outset, rather than one to be ameliorated, as far as may be possible, after the primary decision has been made. We therefore urge the development of a range of evaluation criteria specific to protected landscapes (including and particularly the Chilterns) which recognises both their importance as environmental infrastructure and the distinct approach which that demands; and that such landscapes be considered as Sensitive Receptors for ISA purposes. 2.4 The Scoping Report falls short of acknowledging the seriousness of many of the trends it identifies. It has been overtaken by events in the publication in March 2020 of the Department for Transport's 'Decarbonising transport: setting the challenge'. This heralds a more radical approach which needs to permeate the whole post-consultation version of the Scoping report and needs prominent inclusion in Appendix 3.	General	Baseline, trends, opportunities and appendix updated for ISA report
76	Chilterns Conservation Board (CCB)	2.3 comment above (78) 3.7.2	The comments in our para 2.3 above about the impact on the Chilterns being considered at the earliest possible stage should apply to the corridor connectivity studies suggested in this paragraph. 3.4 This section refers to the range of sites which, under UK law, fall within the requirements for a Habitat Regulations Assessment and describes a sequential test in four stages. Though not on this statutory list, we suggest that EEH should voluntarily apply this discipline to protected landscapes as a whole, as a recognition of their importance and vulnerability in this crowded, economically powerful region. 3.7.2 We applaud the closing sentence, which sums up the main point we are making, and look forward to its rigorous application, although EEH should not underplay the conflicts between the objectives in Table 6.1	Landscape and Townscape	Sensitivity test of corridors included in ISA report. With no specific proposals for these corridors, it has not been possible to undertake a more specific site based assessment. Recommendations for future studies included in ISA report
77	Chilterns Conservation Board (CCB)	Table 4.1	Many parts of this table reflect the depth of current environmental problems and the tension which exists between them and the headline objective of maximising connectivity in the interests of economic growth. Our main point is that in the Chilterns, and the other protected landscapes, a different balance needs to be struck between these concerns than might apply in the region's economic growth points. This needs to be openly acknowledged and assessed in the ISA.	Landscape and Townscape	Included in the ISA report

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
78	Chilterns Conservation Board (CCB)	Table 4.1	On the detail individual sections of Table 4.1 we suggest the following: 1. Landscape and Townscape and/or Historic Environment needs to refer to local uniqueness of the built environment, through a reference to vernacular styles within its first indent 2. Water environment should go beyond extraction and flooding to include the impact on rare and/or vulnerable watercourses, such as chalk streams in the Chilterns, which are already in a poor and declining condition . 3. Air quality needs a fourth indent recognising the impact of air quality on vegetation, for example through Nitrous Oxide. 4. Noise and vibration needs a strong and specific reference to its impact on the tranquility of protected landscapes and similar areas.	Multiple	Baseline updated for the ISA report
79	Chilterns Conservation Board (CCB)	Biodiversity Section (5.6)	The section on biodiversity refers exclusively to localised, statutorily protected sites. This is far too narrow a concept and should be widened to cover protected landscapes at landscape scale across the EEH area.	Biodiversity	Baseline updated for the ISA report
80	Chilterns Conservation Board (CCB)	5.6.6	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 instead to scattered development in rural areas.	Biodiversity	Baseline updated for the ISA report
81	Chilterns Conservation Board (CCB)	5.7.6	The statement that carbon storage is generally low across the area except for "pockets of woodlands such as the Chilterns" may be true, but, as the only mention of the Chiltern woodlands, it seriously downplays their huge value, which should explicitly not be put at risk at all.	Multiple	Baseline updated for the ISA report
82	Chilterns Conservation Board (CCB)	5.7.14	identifies actions to factor natural capital and ecosystems into major infrastructure decisions. It has the feel of saying 'if there's going to be a road, this is how you make it eco-friendly' rather than natural capital considerations entering the equation much further upstream, as a key part of the initial evaluation of such projects. We request amendments to reflect this suggested approach, and the seriousness of the declining future trends identified at 5.7.9-11	Natural Capital and Ecosystem Services	Recommendations made for TS
83	Chilterns Conservation Board (CCB)	5.8.14	The comment on 5.7.14 applies equally to this paragraph: see, for example, its first bullet point, which clearly suggests that a landscape-design approach should be used to soften the impact of a planned road, rather than landscape impact being a determinant of the project in the first place. We feel that this implication is inappropriate everywhere, but as our remit is confined to the Chilterns we request that within the AONB the environmental impact of possible infrastructure should be a prime initial determinant in its planning. Caveats also need to be applied to the third bullet point: we welcome increased access to the AONB, but the means of that access needs to respect the sensitivies of receptor areas and frequently does not mean the unthinking application of conventional transport modes.	Landscape and Townscape	Recommendations made for TS
84	Chilterns Conservation Board (CCB)	5.1	The account of the water environment is very broad-brush and also needs to refer explicitly to local water environments such as the chalk streams of the Chilterns, which are an internationally rare habitat and very fragile.	Water Environment	Baseline updated for the ISA report
85	Chilterns Conservation Board (CCB)	Table 6.1	Biodiversity: AONBs should be added under this heading	Biodiversity	Sustainability objectives updated for ISA report
86	Chilterns Conservation Board (CCB)	Table 6.1	Landscape and townscape: protected landscapes should be referred to explicitly	Landscape and Townscape	Sustainability objectives updated for ISA report
87	Chilterns Conservation Board (CCB)	Table 6.1	Health: we suggest that access to countryside recreation should be added to this Sustainability Objective	Health	Sustainability objectives updated for ISA report
88	Chilterns Conservation Board (CCB)	Table 6.1	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	Water Environment	Sustainability objectives updated for ISA report
89	Chilterns Conservation Board (CCB)	Table 6.1	Noise and Vibration: the impact on the enjoyment of tranquil landscapes should, be included.	Noise and Vibration	Sustainability objectives updated for ISA report
90	Bedfordshire Local Nature Partnership	General	We very much welcome the adoption of an approach that begins to incorporate Natural Capital (NC) and Ecosystem Services (ESS) principles and adopts approaches promoted in the DEFRA "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 SEA topic.	General	Observation noted.
91	Bedfordshire Local Nature Partnership	3.7.3	we welcome the assessment of NC impacts of transport schemes using available baseline data, but this must also include quantitative data on ESS flows in addition to the spatial and qualitative data mentioned. We recommend the use of NC Accounting and the Natural England 'Ecometric' Tool as referenced in the ENCA guidance. 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 Environmental Gain". The TS must enhance rather than degrade or merely maintain, and all transport projects must contribute a minimum 10% NEG.	Natural Capital and Ecosystem Services	Recommendations made for TS
92	Bedfordshire Local Nature Partnership	5.6.9	Biodiversity Opportunities - references "designated enhancement areas" – but does not specifically explain what this refers to. For example, we would expect to see how existing Nature Recovery Strategies and Networks in Bedfordshire are supported/taken forward, including the Greensand Ridge Nature Improvement Area.	Biodiversity	Suggested level of detail too specific for the strategic nature of the assessment.
93	Bedfordshire Local Nature Partnership	5.7.3	We welcome reference to NC within/adjacent to transport corridors and the fact opportunities can be taken to enhance other ESS. This section should also note that the linear nature of transport networks will in itself support development of habitat networks and corridors for species if properly planned. There is a significant opportunity to plan and develop ecological networks according to the principles around condition, extent and connectedness, as outlined by Lawton in his 2010 report and which underpins much of the thinking behind Nature Recovery Networks. Information from Beds NC work (being delivered by Natural Capital Solutions using the same methodologies as work in other counties and as part of the LNCP project) will be available from June/July, and will include ESS valuations. We welcome continued dialogue and opportunities to feed the results of this work into the TS. We welcome the recognition that ESS provision is currently declining and will be impacted by increases in population and vehicle movements, reducing the ability of existing NC to cope - its condition will decline if nothing is done. We welcome acknowledgement that much of the region's existing NC is illplaced to mitigate the negative impacts of transport. This implies that significant new NC is required, which is a position we very much support and therefore require further detail on what this would be.	Natural Capital and Ecosystem Services	Details of specific provisions not possible at the strategic level of the TS and ISA; information likely to be available when specific proposals are considered and developed in line with ISA recommendations.
94	Bedfordshire Local Nature Partnership	Sections 5.10 - 5.14	Water Environment, Air Quality, Climate Change, Soils, Noise -the issues and opportunities sections for these baseline assessments all fail to reference/acknowledge the potential for NC provision to address some of the issues.	Multiple	Sections updated for the ISA report
95	Bedfordshire Local Nature Partnership	General	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.	Multiple	Monitoring measures included in the ISA report
96	South Bedfordshire Friends of the Earth	2.1.4	) I find the fact that you have phrased the net-zero target as "achieving net-zero carbon emissions from transport no later than 2050" as strange. I know of no potential technology associated with transport that can provide negative emissions. Therefore the "net-" is superfluous in this sentence, and acts to weaken the required commitment. It is also stressed in the Committee on Climate Changes reports that personal transport must be zero-emission before freight transport	General	Baseline and appendix updated for ISA report
97	South Bedfordshire Friends of the Earth	5.5.7	Whilst these crime statistics are correctly taken from the BTP report. It is worth noting that they (a) only relate to railways not public transport as a whole and (b) that the passenger number are increasing at a faster rate than the violent crimes. This latter point means " The railway remains a very safe environment – the number of crimes per million journeys made has fallen from 25.6 in 2009/10, to 20.8 in 2018/19" from Ref 31, p7.	Community Safety	Baseline and appendix updated for ISA report

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
98	South Bedfordshire Friends of the Earth	5.11.14	The insight about the impact of autonomous vehicles fails to encompass the potential transformative nature of this intervention. This insight only considers driver assistance technology. If truly autonomous vehicles were achieved that would most be from ride-sharing company (reducing the amount of personal vehicles). They would remove a large portion of the required need for parking spaces – given they could just drive away to a designated lot	Air Quality	Baseline and appendix updated for ISA report
99	South Bedfordshire Friends of the Earth	5.12.1	This inventory cannot be all correct, because it contradicts itself about the proportion of CO2 emissions from transport. Perhaps the units of the second number are wrong. Even if this was the error, the sentence should be rephrased to read more easily – as one intuitively compares 33% to 28% and thinks "that is not a 1% reduction".	Climate Change and Greenhouse Gases	Baseline and appendix updated for ISA report
100	South Bedfordshire Friends of the Earth	5.12.2	This statement would be better phrased to stress that transport represents an even greater contributor/opportunity in the region than nationally	Climate Change and Greenhouse Gases	Baseline and appendix updated for ISA report
101	South Bedfordshire Friends of the Earth	5.12.3	Please clarify if these per-capita numbers are solely transport-related, or from all emissions. Presumably they do not include air travel, given Luton has the lowest numbers.	Climate Change and Greenhouse Gases	Baseline and appendix updated for ISA report
102	South Bedfordshire Friends of the Earth	5.12.5	The Paris Agreement was negotiated in 2015 not 2014	Climate Change and Greenhouse Gases	Baseline and appendix updated for ISA report
103	South Bedfordshire Friends of the Earth	5.12.6	I am unsure why only historical statements about charging infrastructure are included. The Committee on Climate Change gives a requirement for chargers to support electric (personal) transport that is an order of magnitude bigger than this. They also state a requirement for 90,000 overnight HGV charges for freight transport (unless hydrogen is adopted).	Climate Change and Greenhouse Gases	Baseline and appendix updated for ISA report
104	South Bedfordshire Friends of the Earth	5.12.7	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).	Climate Change and Greenhouse Gases	Baseline and appendix updated for ISA report
105	South Bedfordshire Friends of the Earth	5.12.8	This first sentence is worded strangely. It is meant demonstrate that we will not be able to differentiate between the various warming scenarios on the near-term. The subject of the sentence should be the warming not our estimates of it.	Climate Change and Greenhouse Gases	Baseline and appendix updated for ISA report
106	South Bedfordshire Friends of the Earth	5.12.9	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 timescale of the Transport Strategy (now to 2050) – which is reason of including 5.12.8 in the report.	Climate Change and Greenhouse Gases	Baseline and appendix updated for ISA report
107	South Bedfordshire Friends of the Earth	5.12.10	Noting a need for an increase in charging infrastructure seems insufficiently strong. Given that there should no transport emissions by 2050, noting that any fossil-fuel infrastructure provisioned under the transport strategy should include a plan to transform itself to still be relevant by 2050.	Climate Change and Greenhouse Gases	Baseline and appendix updated for ISA report
108	South Bedfordshire Friends of the Earth	In direct response to your questions:	1.In general, I do agree with the policy context. However there are inaccuracies in the baseline information presented.	General	Baseline and appendix updated for ISA report
109	South Bedfordshire Friends of the Earth	In direct response to your questions:	2.No additional sustainability issues struck me	General	Observation noted.
110	South Bedfordshire Friends of the Earth	In direct response to your questions:	3.I do not agree with the statement that "There is a need to support the continued increase in infrastructure to support the demand in electric cars". A statement saying "the fuelling/charging infrastructure must support the shift to transportation without carbon emissions".	Climate Change and Greenhouse Gases	Baseline and appendix updated for ISA report
111	South Bedfordshire Friends of the Earth	In direct response to your questions:	4.I don't really have other comments, but I worry that it may not be fit for purpose after the societal changes emerging from the COVID-19 crisis.	General	Observation noted.
112	CPRE, The Countryside Charity	General	Before commenting on the Scoping Report itself, we find that a Transport Strategy that is not based on a strategic spatial plan for the Arc is going to be something of an abstract document, as we found with the Outline Transport Strategy published in July 2019. That document contained some worthy and in some cases novel ideas, but it was not rooted in a spatial development plan. Many aspects of the ISA will be dependent on the actual location of transport schemes which in turn are dependent on spatial development proposals. One example might be an assessment of the effect of the Transport Strategy on ancient woodland. But if the Strategy does not contain actual 'line on the map' transport projects, how can that be assessed? Similarly, the potential for modal shift from road transport to other forms is dependent on the spatial relationship between housing, employment and other facilities, whereas all we have at present are Local Plans to, say, 2035.	General	There is no requirement for the TS to be a strategic spatial plan. There are spatial aspects to it, which are dealt with in the ISA, but the methodology 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.
113	CPRE, The Countryside Charity	General	A second general point to make is that there has been a recent gradual declining trend in commuting, with people working from home one or two days a week (in jobs where that is possible), utilising modern technology and broadband communications. The present pandemic has brought this into stark focus with many more employees working from home full-time. It is quite plausible that, in the light of this experience, the future will not be 'business as usual', commuting levels will not return to their pre-pandemic levels and that home-working will continue at a new, higher level. There are also likely to be further increases in home deliveries, with implications for 'last mile' transport. The ISA should recognise this scenario in the options which it assesses.	General	The uncertainty created by the pandemic is acknowledged in the ISA. It is too early to explore specific scenarios for future, post COVID norms.
114	CPRE, The Countryside Charity	1.1.2	"… realise the economic potential of the region, whilst ensuring the principles of sustainable development are followed to maximise social and environmental benefits". Sustainability principles are that equal weight should be given to economic, social and environmental factors (the 'three-legged stool'), not that economic growth should be primary with, by the way, social and environmental benefits.	General	Observation noted.
115	CPRE, The Countryside Charity	2.1.1-2	Mention should be made here of the contribution of Local Nature Partnerships and other non-local-government stakeholders	General	Baseline and appendix updated for ISA report
116	CPRE, The Countryside Charity	2.1.4	Environmental protection and enhancement is missing from these bullet-points (except the reference to emissions reduction).	General	Recommendations made for TS
117	CPRE, The Countryside Charity	2.1.5	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 to sit alongside those listed in the five bullet-points.	General	Recommendations made for TS
118	CPRE, The Countryside Charity	2.1.10	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 applies to locations other than Oxfordshire too.)	General	No such detailed proposals are being made at this time and therefore cannot be assessed beyond general conclusions.
119	CPRE, The Countryside Charity	2.1.12	The Expressway has been 'paused' pending a review of alternative options: the paragraph should make this clearer. However, without a decision on this project or an alternative option the Transport Strategy is going to be rather hollow.	General	Baseline and appendix updated for ISA report
120	CPRE, The Countryside Charity	2.1.14	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.	General	Baseline and appendix updated for ISA report
121	CPRE, The Countryside Charity	2.1.15	As mentioned above, a Transport Strategy without a spatial plan can only be very general in nature, and is likely to require substantial revision once a spatial plan is produced. A spatial plan would be able to capture the impacts – economic, social and environmental – of major urban areas outside the Arc, e.g. Reading, the West Midlands and of course London. These have important consequences for transport in the Arc.	General	There is no requirement for the TS to be a strategic spatial plan. There are spatial aspects to it, which are dealt with in the ISA, but the methodology is applied to policies also. Once spatial proposals are made, they will be assessed at that time (at scheme level), but that is without the scope of this ISA.
122	CPRE, The Countryside Charity	3.2	SEA contains a requirement to evaluate options within the strategy being assessed. We do not find that this is brought out in the Scoping Report.	General	Alternatives are present in the ISA report.
123	CPRE, The Countryside Charity	3.7.2	CPRE would want to see it made clear here as to how cumulative impacts would be assessed, which is a key part of the SEA process. Also, "Factoring in natural capital into an SEA can broaden the view of nature beyond a constraint on development to an opportunity to deliver social and economic outcomes" is a very dangerous statement and could be used by spatial and transport planners as an excuse to downgrade efforts to avoid negative environmental impacts.	General	Cumulative impacts included in the ISA report
124	CPRE, The Countryside Charity	Table 4.1	Population and Equalities, 1st bullet-point: add that local employment opportunities reduce the need to travel.	General	Sections updated for the ISA report
125	CPRE, The Countryside Charity	Table 4.1	Landscape and townscape: any necessary development should mitigate landscape impacts and not reduce tranquillity. "Allow them to continue to evolve" – what does that mean?	General	Sections updated for the ISA report
126	CPRE, The Countryside Charity	Table 4.1	Water environment: the Table should contain a reference to minimising water consumption	General	Sections updated for the ISA report
127	CPRE, The Countryside Charity	Table 4.1	Somewhere in this Table there should be a reference to minimising light pollution.	General	Sections updated for the ISA report

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
128	CPRE, The Countryside Charity	5.2.10	These figures should be questioned. It is not clear whether the ONS has made projections based on extrapolating current trends or local plans. Development proposals of themselves bring population increases by attracting households from outside the area	General	Sections updated for the ISA report
129	CPRE, The Countryside Charity	5.2.13	2nd bullet-point: this needs expansion. Opportunities to reduce car use include local transport hubs, on-demand minibuses and support for local services such as village shops, rural post offices, pubs and health provision.	General	Sections updated for the ISA report
130	CPRE, The Countryside Charity	5.4.11	Continued traffic growth without adequate provision for pedestrian and cyclists' facilities is unsustainable". Continued traffic growth even with provision for active travel is unsustainable! Segregated routes for walking and cycling on a properly planned network serving popular origins and destinations have to be made attractive and designed in from the start.	General	Recommendations made for TS
131	CPRE, The Countryside Charity	5.4.13	Use of the word "could" is weak (1st bullet-point). See comment on 5.4.11, above	General	Sections updated for the ISA report
132	CPRE, The Countryside Charity	5.5.2	"Accidents" is an out-of-date term in respect of these incidents. The correct term, used by the emergency services and highways teams is "road traffic collisions".	Community Safety	Sections updated for the ISA report
133	CPRE, The Countryside Charity	5.6.1	To this list should be added Nature Improvement Areas, Ancient Woodlands, County Wildlife Sites and, within Oxfordshire, Conservation Target Areas (other counties may use different nomenclature).	General	Sections updated for the ISA report
134	CPRE, The Countryside Charity	5.6.9	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.	General	Sections updated for the ISA report
135	CPRE, The Countryside Charity	5.7.5	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	General	Topics considered in the ISA report
136	CPRE, The Countryside Charity	5.7.14	5th bullet-point: improvement of habitats including tree and hedge planting should not be limited to walking and cycling routes but be encouraged along all new and existing transport infrastructure, not only to improve health and wellbeing but also in order to mitigate landscape impacts and reduce noise and light pollution. Also missing from this list are severance effects, both of communities divided by transport infrastructure and by diversions and stopping-up of rights-of-way, some of which are historic routes.	General	Sections updated for the ISA report
137	CPRE, The Countryside Charity	5.8.2	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.	Landscape and Townscape	Sections updated for the ISA report
138	CPRE, The Countryside Charity	5.8.13	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 undesignated locally valued landscapes which should not be ignored in the Assessment.	General	Assessment kept at a strategic level. Recommendations made for more local assessments.
139	CPRE, The Countryside Charity	5.9.8	Historic landscapes, which may well not be designated, should also be recognised as being at risk.	Historic Environment	Sections updated for the ISA report
140	CPRE, The Countryside Charity	5.11.13	1st bullet-point: This must be challenged. The Transport Strategy will be worth little unless it contains measures and proposals to avoid increases in the number of private and commercial road vehicles, both passenger and freight	General	Recommendations made for TS
141	CPRE, The Countryside Charity	5.11.14	1st bullet-point: See our comment on para 5.11.13, above.	General	Recommendations made for TS
142	CPRE, The Countryside Charity	5.12.9	The Transport Strategy must contain measures to reduce the need to travel as well as reductions in private and commercial road traffic. Transformational improvements to public transport including easy modal interchanges have a major part to play, but also reductions in the distances between residential areas and employment, public facilities such as schools, colleges, hospitals, surgeries, shopping areas, leisure facilities and other popular destinations. Hence the need for a spatial plan to precede the Transport Plan	General	Recommendations made for TS
143	CPRE, The Countryside Charity	5.12.13	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 protection than hitherto, and the ISP must assess this.	General	Addressed in ISA report
144	CPRE, The Countryside Charity	5.13.9	Add a reference to more efficient use of land.	General	Sections updated for the ISA report
145	CPRE, The Countryside Charity	5.14.3	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	General	Observation noted.
146	CPRE, The Countryside Charity	Table 6.1	We are particularly concerned that there is no specific objective on sustainable transport, given the frequent public statements from EEH that set out its aspirations in this area. We recommend that an objective to cover this issue is included in the final version of the ISA. Such an objective could be phrased along similar lines to the one used for the Greater Manchester Spatial Framework Integrated Assessment, and should ask whether the proposed strategy: • Reduces the need to travel and promotes efficient patterns of movement • Promotes a safe and sustainable public transport network that reduces reliance on private motor vehicles • Supports the use of sustainable and active modes of transport.	General	Addressed in the TS and in ISA report
147	CPRE, The Countryside Charity	Table 6.1	Community Safety: see our comment on para 5.5.2, above.	Community Safety	Sections updated for the ISA report
148	CPRE, The Countryside Charity	Table 6.1	Landscape and townscape: not only designated landscapes – see our comment on para 5.8.13, above.	Landscape and Townscape	Sections updated for the ISA report
149	CPRE, The Countryside Charity	Table 6.1	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 infrastructure can have an effect on the 'openness' of the Green Belt and can put at risk the official Green Belt purposes (defined in the National Planning Policy Framework) of limiting urban sprawl and of safeguarding the setting of historic cities, especially Oxford and Cambridge..	Landscape and Townscape	Sections updated for the ISA report
150	CPRE, The Countryside Charity	Table 6.1	Climate Change and Greenhouse Gases: 3rd bullet-point is ambiguous. Insert the word "charging" before the word "infrastructure". There should be a reference to Government commitment to net zero carbon by 2050.	General	Sections updated for the ISA report
151	CPRE, The Countryside Charity	Table 6.1	The statement "There is a need to reduce the environmental impact of prosperity and the provision of infrastructure and housing to accommodate it", rather hidden in para 5.12.9, is sufficiently important to be included in Table 6.1.	General	Sections updated for the ISA report
152	CPRE, The Countryside Charity	Table 6.1	Other gaps in this table include: • No reference to minimising water consumption • No reference to maintaining or expanding the rights-of-way network • No reference to light pollution or tranquillity.	General	Sections updated for the ISA report
153	CPRE, The Countryside Charity	Next Steps	We understood that the public consultation period on the Transport Strategy would be 12 weeks, commencing in July. Table 7.1 does not seem to be consistent with this.	General	Programme error in table, updated for ISA report.
154	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf	1. Cart before the horse We are concerned that the ISA scoping report has been compiled after much work has already been started on the Transport Strategy: the 'Framework for Engagement' was published in Summer 2019, more than six months before the ISA scoping report was published. We understand that the 'Framework for Engagement' is not a draft plan, but the document suggests that a range of important and contestable decisions have already been made, in advance of the ISA. These include • a strong focus on connectivity (rather than, say, reducing the need to travel which is a more minor component) • an 'ambition' for a zero-carbon transport system by 2050 (rather than, say, zero carbon being the primary aim of the strategy, or achievement of zero carbon before 2050) • an underlying assumption about the primary importance of economic growth in the region (rather than, say, a circular economy or a more equitable national distribution of economic growth). This is inconsistent with good practice, which is to begin the ISA early in plan-making, before any significant decisions have been made .	General	Comments apply to the TS process rather the ISA. Observations noted

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
155	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General Such as paras 5.4.8, 5.6.5, 5.6.7, 5.7.9-5.7.11, 5.8.10, 5.10.9, 5.11.7, and 5.12.7 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876251/decarbonising-transport-setting-the-challenge.pdf	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 5.12.8), and throughout its final Table 6.1 SA Framework Sustainability Objectives. The ISA must honestly and objectively assess the impacts of the emergent EEH Strategy. Some of the pro-growth assumptions in the ISA are already overtaken by the DfT's 2020 Decarbonising Transport .	General	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. Sustainability objectives also updated.
156	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General	3. Inconsistent population figures The ISA uses the 2016-based subnational population projections as a basis for its 'future trends' analysis at 5.2.10. This is inconsistent with MHCLG advice that the higher 2014-based projections should be used . More up-to-date (and still lower) population projections were published in October 2019 ; these do not take into account the effects of Brexit, which is widely expected to lead to still lower population growth. 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 ISA and Transport Strategy should provide a clear explanation about the projections used, how these relate to national and local projections, and why these are still relevant post-Brexit.	Population and Equalities	Baseline updated for the ISA report
157	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General	4. Unclear policy context and remit This issue relates to a broader concern that we have about the Transport Strategy and which is not clarified in the scoping report, namely that the role of the transport strategy in the wider planning 'landscape' is unclear. What decisions will be in the strategy's remit? How will it link to national-level decisions by Highways England, the National Infrastructure Commission etc.; and to Local Transport Plans and other local-scale plans? For instance the Outline Transport Strategy Framework for Engagement refers to, but does not clearly advocate (or oppose) the Oxford-Cambridge expressway, which Highways England has 'paused', and which is opposed by most of the local authorities in Oxfordshire. Clearly it is difficult to prepare a transport strategy – and to consider and assess alternatives to the strategy - in the absence of a national decision about a key project in the region. The ISA scoping report's policy context (Ch. 4) makes this no clearer. Moreover, the COVID-19 crisis has led to dramatic changes in travel patterns and transport use. For instance, traffic levels are at their lowest levels since 1955 (with an associated large drop in air pollution) . Many commentators, including motoring organisations , consider that this is likely to lead to a permanent shift in how people work and interact, with profound implications for transport and IT infrastructure. The EEH needs to consider the potential implications of these changes and reflect them in its work.	General	Recommendations made for TS
158	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General (figure 1 is on 'references sheet	5. Inter-regional inequality Although the ISA refers to intra-regional inequality at Section 5.4, it says nothing about inter-regional inequalities. While there are clearly inequalities within the region and within Oxfordshire itself (and we have suggested some of the measures needed to address these), as far as England overall is concerned the EEH area is one of the least deprived in the country (see Figure 1). Arguably much effort should also be going into reducing deprivation in other regions. This could include greater support for more sustainable economic development in those areas than in the EEH region. The ISA makes no mention of this.	General	Outside the scope of the ISA, which focusses on the EEH region.
159	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General	6. SA framework: Need for environmental targets We take issue with many of the 'sustainability objectives' in the proposed SA framework of Table 6.1, notably their unsustainable focus on connectivity as an objective and the lack of clearly-stated environmental targets. We propose that the objectives should be recast as in the table below (see refence sheet for table they have produced)	General	Sustainability objectives updated for ISA report but as they are for assessment purposes only, targets are not included.
160	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General	7. Special Protection Areas and Special Areas of Conservation Legally, we believe that EEH and the ISA are on very shaky ground with respect to the proposed approach to Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). From the perspective of potential legal challenge, this is the area where we recommend the greatest changes. These relate both to the strategic environmental assessment (SEA) process and the proposed Habitats Regulations Assessment (HRA) process. These are discussed in turn: (below)	General	Details provided in Appendix G to the ISA, the HRSA. Recommendations made to the TS.
161	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General (related to comment 163 above)	The SEA Directive requires the environmental report (here the ISA) to discuss "any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC"... in other words, in particular relating to SPA and SACs.	General	Details provided in Appendix G to the ISA, the HRSA. Recommendations made to the TS.
162	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General (related to comment 163 above)	Although Table 5.2 lists the SPAs and SACs in the region (n.b. some outside the region are also likely to be affected by the Transport Strategy, especially near major roads such as the M25, M40 and M4), the ISA gives no indication of existing environmental problems that are relevant to these SPAs and SACs. Of the 18 SACs listed, at least half are sensitive to air pollution: Hartslock Wood , Oxford Meadows, Burnham Beeches, Chilterns Beechwoods, Wormley-Hoddesdonpark Woods, Eversden and Wimpole Woods, Fenland, Barnack Hills and Holes, and Devil's Dyke . This should be clearly stated in the ISA, and the impacts of any future Transport Strategy should be analysed.	General	Details provided in Appendix G to the ISA, the HRSA. Recommendations made to the TS.
163	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General (related to comment 163 above)	The condition of the qualifying features underlying several of the SPAs and SACs is also poor , and also not recorded in the ISA. These include spined loach and crested newts at the Fenland SAC and a range of wetland birds at the Lee Valley SPA.	General	Details provided in Appendix G to the ISA, the HRSA. Recommendations made to the TS.
164	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General (related to comment 163 above)	Of greater concern is the blithe statement at para. 3.4.3 that, after carrying out Stage 1 of the Habitats Regulations Assessment (HRA), "Stages 2 to 4 will be excluded due to the strategic nature of the Strategy". There is absolutely nothing in the Habitats Directive that allows for such an exclusion. Article 6.3 of the Habitats Directive clearly states that: "Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public." (Our italics)	General	Details provided in Appendix G to the ISA, the HRSA. Recommendations made to the TS.

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
165	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General (related to comment 163 above)	The HRA process is very precautionary: rightly so, since it is protecting internationally important sites of nature conservation importance. As the ISA correctly notes, European guidance divides the requirements of Article 6.3 into Stage 1 screening and State 2 appropriate assessment. If Stage 1 screening cannot show that significant effects on SPAs and SACs are unlikely , then the HRA must proceed to Stage 2 . There is no exception for 'strategic nature'. Those aspects 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. 1.1.4 of the ISA) must be shown to not adversely affect the integrity of any SPA or SAC. The ISA's proposed approach would leave EEH wide open to legal challenge.	General	Details provided in Appendix G to the ISA, the HRSA. Recommendations made to the TS.
166	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General (related to comment 163 above)	The ISA (including the HRA) and the EEH Transport Strategy should anyway be promoting the strong protection of the internationally important sites, and should welcome the opportunity to show through HRA that this is the case.	General	Details provided in Appendix G to the ISA, the HRSA. Recommendations made to the TS.
167	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General	8. Alternatives The next stage of the ISA will involve identifying, assessing and comparing 'reasonable alternatives'. As a positive contribution to this next step, and in line with good practice advice - we suggest some alternatives that aim to deal with existing problems in and outside the region. These could include (included in table on POETs refernece sheet)	General	Alternatives assessed are those considered by the EEH in preparation of the TS. Recommendations made to the TS.
168	Planning Oxfordshire's Environment and Transport Sustainably (POETS)	General	9. For the Transport Strategy (rather than specifically the ISA)

The coronavirus emergency is leading to high levels of home-working, a shift towards Internet-based meetings, and strong reductions of traffic on the roads. The impacts of Brexit, particularly combined with coronavirus (many people returning to their original countries, for instance to be with relatives during the crisis), will also be significant. Impacts could include much-reduced population growth; a greater emphasis on local production of goods, and local community activities and action; much more active travel (walking and cycling); and more emphasis on value of improved broadband connectivity.

We believe that the Transport Strategy should remain very flexible, or indeed should be delayed for a year or two to allow the effects of these two factors to be understood. Many of the strategy's current assumptions about (the need for) high levels of economic growth in the EEH area may, in time, prove to be unfounded.

We also believe that some of the very sustainable trends currently resulting from coronavirus have the potential to become permanent, especially if supported by good transport policies. These could include:
• Rapid roll-out of high-speed broadband
• Road pricing, parking charges and other financial "sticks" to discourage resumption of car travel
• Support for the localisation of services, e.g. food stores in rural villages that are currently lacking such a store
• Significantly higher levels of walking and cycling | General | Recommendations made for TS |
| 169 | North Northants Joint Planning Unit | | Policy context

The policy context and the issues that are identified are consistent with the key issues that were raised in the NN JPC's response. It would be helpful if the relevant documents could be referenced within the SA for clarity. | General | Sections updated for the ISA report |
170	North Northants Joint Planning Unit	5.2.13	Changing working habits such as remote working are likely to lead to reduced demand for journeys to work, particularly as a result of homeworking becoming the norm for many people during the coronavirus pandemic. However, there may be increased journeys for social interaction and leisure and this could be referenced in the Issues and Opportunities regarding population	General	The uncertainty created by the pandemic is acknowledged in the ISA. It is too early to explore specific scenarios for future, post COVID norms.
171	North Northants Joint Planning Unit	5.3.3	Further information should be provided to explain this, in particular for East Northamptonshire Council. If necessary, the reference to East Northamptonshire Council should be deleted.	Economy	Sections updated for the ISA report
172	North Northants Joint Planning Unit	5.3.5	This para should recognise the important role of logistics within the area. North Northamptonshire sits within the 'Golden Triangle of Logistics' with the A14 (a 'Trans European Route' (E24)) providing linkages to the M1 and M6 as well as to the East Coast ports.	Economy	Sections updated for the ISA report
173	North Northants Joint Planning Unit	5.3.12 and 5.3.14	We recognise the important role that East-West Rail will play within the EEH area as referenced in para 5.1.12 and identified as a key opportunity in para 5.3.14. However, NN is peripheral to the likely routes of East-West Rail and the Expressway within the Arc, but the A43/A45/A14 currently provide a key strategic route between Oxford and Cambridge and is also a key economic artery for North Northamptonshire connecting the main urban centres and growth locations throughout the county and beyond as well as connecting with major transport hubs such as airports. The investment that has been made on the A14 corridor at the M1 junction, Kettering and the Cambridge to Huntingdon improvements should be recognised with the improved travel times and this can be further utilised in the Northern part of the EEH area.

Opportunities presented by rail freight could be identified. | Economy | Recommendations made for TS |
174	North Northants Joint Planning Unit	5.4.13	We support the reference in para 5.4.13 that "The transport strategy could present opportunities to enhance walking and cycling routes and encourage the use of non-motorised forms of transport". Private motor vehicles will remain vital for many trips in a semi-rural area such as North Northamptonshire. However, as we set out in the NN JPC's response to the Outline Transport Strategy, we would expect enhancing walking and cycling routes and encouraging the use of non-motorised forms of transport to be a central and vital part of the transport strategy, given its potential contribution to health and wellbeing, alleviating congestion and providing greater access to services and facilities. This is supported by the emerging AECOM Central Area Infrastructure Assessment which identifies that travel in the region is dominated by car use and there is significant opportunity for modal shift.	General	Recommendations made for TS
175	North Northants Joint Planning Unit	5.4	Although air quality is addressed in a separate section, it should also be referenced in the health section, given the significant impact of air pollution on health and wellbeing.	Health	Sections updated for the ISA report
176	North Northants Joint Planning Unit	5.4	An opportunity associated with cycling would be to ensure that the design of cycling routes take into account suitable design that will encourage cycling trips.	General	Sections updated for the ISA report
177	North Northants Joint Planning Unit	5.5.7	Road safety should be identified as a key issue as para 5.5.5 sets out that: "The number of people seriously hurt or killed on the roads is significantly higher than the national average in parts of the region".	Community Safety	Sections updated for the ISA report
178	North Northants Joint Planning Unit	5.6.9	It is worth noting that the draft environment bill is seeking 10% Biodiversity Net Gain but various local authorities are adopting this % or another % ahead of the environment bill coming into effect or setting targets such as 'the doubling of nature'. The SA needs to recognise whatever national and local targets are in place for Biodiversity Net Gain. These targets should also be reflected in the sustainability objective for biodiversity.	Biodiversity	Sections updated for the ISA report
179	North Northants Joint Planning Unit	5.7.14	3rd bullet point: As drafted, the wording could be taken to imply that if Natural Capital is not specifically mitigating transport infrastructure then it is not necessary. It would better to re-word more positively along the following lines: "Based on the spatial data available, much of the region's natural capital is widely spread out providing different benefits in different areas. This, however, means that the demand for some ecosystem services isn't necessarily close to where the supply of a service can be found, this is particularly so for the impacts caused by transport".	Natural Capital and Ecosystem Services	Sections updated for the ISA report
180	North Northants Joint Planning Unit	5.8.5	This should also refer to Wellingborough and Rushden.	Landscape and Townscape	Sections updated for the ISA report
181	North Northants Joint Planning Unit	5.8.7	This should reference the A14 (a 'Trans European Route' (E24)) providing linkages to the M1 and M6 as well as to the East Coast ports.	Landscape and Townscape	Sections updated for the ISA report
182	North Northants Joint Planning Unit	5.11 and 5.12	These sections could reference opportunities presented by Rail Freight as a key CO2 emitter in the area is lorry freight.	Multiple	Sections updated for the ISA report
183	North Northants Joint Planning Unit	5.11.12	This para (or section in general) could reference plans the Government announced in February which brought forward the proposed ban on selling new petrol, diesel or hybrid cars in the UK will from 2040 to 2035 at the latest which should facilitate a reduction in emissions from this sector under future trends. We note that this is referenced as an opportunity at para 5.11.14 and is also referenced at 5.12.6.	Air Quality	Sections updated for the ISA report
184	North Northants Joint Planning Unit	General	2. Are there any additional sustainability issues which should be identified? The list of sustainability issues is comprehensive.	General	No action required.

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
185	North Northants Joint Planning Unit	Table 6.1	We agree with the sustainability objectives in Table 6.1. We support the sustainability objectives for Biodiversity and Natural Capital. 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.	General	Sections updated for the ISA report
186	North Northants Joint Planning Unit	General	We support the Integrated Sustainability Appraisal approach which comprises: • Strategic Environmental Assessment (SEA); • Health Impact Assessment (HIA); • Habitats Regulations Assessment (HRA); • Equality Impact Assessment (EqIA); and • Community Safety Assessment (CSA). The JPDU welcomes the opportunity to work with EEH 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 Samuel Humphries.	General	Observation noted.
187	Milton Keynes Council	General	1. Do you agree with the policy context and baseline information presented? Yes	General	Noted.
188	Milton Keynes Council	General	2. Are there any additional sustainability issues which should be identified? Not aware of any	General	Noted.
189	Milton Keynes Council	General	3. Do you agree with sustainability objectives in Table 6.1? I have only a comment on the Road safety one. This currently reads: To promote safe transport through reducing accidents and improving security. It would be better to say reducing severe and fatal accidents or reducing KSIs, to be more in line with a Vision Zero approach where the focus is on eliminating deaths and serious injury.	Community Safety	Sustainability objectives updated for ISA report
190	Milton Keynes Council	General	4. Do you have any other comments on the approach to assessment? No	General	Noted.
191	Luton Council	General	One additional comment that I received that didn't relate specifically to the ISA (it relates to the corridor studies) was given that one of the four draft principles see para 2.1.4 of the ISA is "achieving net-zero carbon emissions from transport no later than 2050.", that there could be a potential for policy conflict with other Councils in the EEH area that had set earlier targets than that (eg 2040 in Luton). Suggestion is that any of the proposed corridor studies incorporating Luton will need to be mindful of this policy difference.	General	Recommendations made for TS
192	Luton Council	5.2.2	replace EHH with EEH	Population and Equalities	Updated for ISA report
193	Luton Council	5.2.5	replace NQV with NVQ	Population and Equalities	Updated for ISA report
194	Luton Council	5.8.4	The words 'Table 5.3 below' should be added to the end of para 5.8.3 and subsequent paras renumbered.	General	Updated for ISA report
195	Luton Council	5.8.7	the third bullet point should also recognise the importance of Great Western Railway and Chiltern Railway in the west of EE	General	Updated for ISA report
196	Luton Council	5.8.14	towards the end of the first sentence in the third Bullet Point,replace 'adaption' with 'adaptation'	Landscape and Townscape	Updated for ISA report
197	Luton Council	5.10.1	et al- Upper Lee valley from where it rises in Luton to the Harpenden area of Herts is an incorrect spelling – it is the Upper Lea in this area).	Water Environment	Sections updated for the ISA report
198	Luton Council	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	Natural Capital and Ecosystem Services	Sections updated for the ISA report
199	Luton Council	Natural Capital and Ecosystem services	Protecting and improving the situation in respect of deficiencies in general open space of recreational value or the need to protect and improve outdoor sports facilities is completely absent from the document	Natural Capital and Ecosystem Services	Sections updated for the ISA report
200	Luton Council	Natural Capital and Ecosystem services	The River Lea, a strategic area of blue infrastructure should be included in the assessments. Road runoff has a detrimental effect on the river course in Luton and the impacts of new schemes on both water quality and the deposits of silt e.g that might excacerbate the situation at the Grade II Listed Wardown Park , Luton which has already led to the removal of boating from the lake.	Natural Capital and Ecosystem Services	The assessment kept strategic at this stage. Recommendations made for more specific assessments as and when more specific proposals are considered/developed.
201	Luton Council	Natural Capital and Ecosystem services	I do not have confidence that the document gives a heavy enough steer to the importance of ensuring that future transport schemes and proposals give any consideration to environmental improvements that benefit local people. Improved parks, public spaces, sports facilities, river corridors, tree planting and landscaping absent from this scoping report.	Natural Capital and Ecosystem Services	May be too related to spatial planning to feature in a TS
202	Luton Council	Natural Capital and Ecosystem services	There is no mention of the Ash dieback issues that currently blight local transport routes or any suggestions as to how to contribute to resolving the problem.	Natural Capital and Ecosystem Services	The assessment kept strategic at this stage. Recommendations made for more specific assessments as and when more specific proposals are considered/developed.
203	Luton Council	Natural Capital and Ecosystem services	In addition to including these via a requirement to include a full Environmental Impact Assessment there needs to be a requirement that all of these issues are considered at the planning stage with appropriate mitigation for any losses required in advance of development.	General	Recommendations made for TS
204	Luton Council	Historic Environment Plan Question 1	The policy context presented in the ISA appears to focus entirely on requirements set out in Chapter 15 of the NPPF which relate to the natural environment and not the historic environment. The authors of the report appear not to be aware that it is Chapter 16 of the NPPF that deals specifically with the historic environment. This needs to be addressed. The brief mention of the Ancient Monuments and Archaeological Areas Act 1979 in Appendix C also fails entirely to describe the purpose of the Act, focussing instead on the extent of public control of protected monuments on agricultural land. In short, we do not agree with the manner in which the policy context for the historic environment has been handled in the ISA and consider it needs revision.	Historic Environment	Sections updated for the ISA report
205	Luton Council	Historic Environment Plan Question 1	Section 5.9 of the ISA deals with the historic environment and the footnotes suggest that the baseline information has been derived from Historic England and Local Authority data. The Archaeology Team cannot confirm whether any data on the historic environment was sought from the Local Authority for this study but are disappointed to see that non-designated elements of the historic environment are completely absent from this section of the report.	Historic Environment	The assessment kept strategic at this stage. Recommendations made for more specific assessments as and when more specific proposals are considered/developed.
206	Luton Council	Historic Environment Plan Question 1	They are also completely absent from the figures displayed in Appendix B. Given that it is the non-designated elements of the historic environment that are most at threat from development of any type, we consider this omission inappropriate and believe it should be amended.	Historic Environment	The assessment kept strategic at this stage. Recommendations made for more specific assessments as and when more specific proposals are considered/developed.
207	Luton Council	Historic Environment Plan Question 3 Table 6.1	•New and/or upgraded transport infrastructure across the EEH region has the potential to affect the survival, fabric, condition and setting of cultural heritage assets both above and below the ground. Agree	Historic Environment	Observation noted.
208	Luton Council	Historic Environment Plan Question 3 Table 6.1	•There is potential for development to encroach on non-designated sites or areas of high archaeological value. Early evaluation of such areas where non-designated archaeological remains may be is preferable to avoid delays to delivery and to ensure appropriate enhancement and public engagement. This bullet point should also include something about making every effort to protect non-designated remains that may be of equivalent significance to designated sites	Historic Environment	Sections updated for the ISA report
209	Luton Council	Historic Environment Plan Question 3 Table 6.1	•Vehicle damage and pollution can adversely affect both listed buildings and scheduled monuments. They can also have an adverse impact on non-designated sites (whether buildings or monuments), this should be changed.	Historic Environment	Sections updated for the ISA report

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
210	Luton Council	Historic Environment Plan Question 3 Table 6.1	Sustainability Objective - To protect and enhance the character of the Heartland's built and historic environment. Again, there is an opportunity here to link the historic environment with health, well-being and sustainability. This should be addressed.	Historic Environment	Sustainability objectives updated for ISA
211	Luton Council	Historic Environment Plan Question 4	The Archaeology Team are disappointed with the handling of the historic environment in the ISA. Given the scale of infrastructure associated with transport schemes we consider the broad brush (and sometimes inaccurate) treatment of the historic environment in the ISA concerning.	Historic Environment	Observation noted. Sections updated for ISA.
212	Luton Council	Historic Environment Plan Question 4 5.9.8	The second bullet point of paragraph 5.9.8 states: •The NPPF does address non designated assets, and direct physical impacts occur on them. For archaeological resource, the impacts are permanent as they are destroyed. 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).	Historic Environment	Would be covered by project specific arrangements which cannot be specified at this stage. Recommendations made for more detailed assessment when specific proposals are considered/developed.
213	Luton Council	Historic Environment Plan Question 4 5.9.8	The fourth bullet point of paragraph 5.9.8 states: •There is potential for development to encroach on locally designated sites or areas of high archaeological value, that do not have the same statutory protection as nationally listed sites. This is another accepted statement of fact, but the authors would be advised to consider here footnote 63 (against para 194 of the NPPF) that specifically provides guidance for dealing with non-designated heritage assets of equivalent significance to designated ones. Once again there is no opportunity linked to this bullet point. National infrastructure projects should lead by example and this is a case where options to develop best practise in the treatment of nationally important but non-designated heritage assets should be considered.	Historic Environment	Would be covered by project specific arrangements which cannot be specified at this stage. Recommendations made for more detailed assessment when specific proposals are considered/developed.
214	Luton Council	Historic Environment Plan Question 4 5.9.8	The fifth bullet point of paragraph 5.9.8 states: •Ancillary features of transport infrastructure can adversely impact upon the setting of historic assets, especially those in urban areas. The Strategy should therefore respect the historic context of the region to sustain the significance of its assets. It would be advisable to change 'historic assets' to 'heritage assets' in this bullet point. Additionally, features associated with transport infrastructure can adversely impact upon the historic environment in any context, not just in urban areas. This should be amended.	Historic Environment	Sections updated for the ISA report
215	Luton Council	Historic Environment Plan Question 4 5.9.8	The sixth bullet of paragraph 5.9.8 states: •Highly significant archaeological remains, whether designated or not, normally require preservation in situ. This clearly has implications and can represent a significant constraint to future scheme design, which should respect, retain and protect the remains (e.g. through avoidance and redesign). 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 lead by example and this is a case where options to develop best practise for the preservation in situ of archaeological remains should be considered.	Historic Environment	Would be covered by project specific arrangements which cannot be specified at this stage. Recommendations made for more detailed assessment when specific proposals are considered/developed.
216	Luton Council	Historic Environment Plan Question 4 5.9.8	The seventh bullet of paragraph 5.9.8 states: •Vehicle damage and pollution can adversely affect both listed buildings and scheduled monuments, so reducing vehicle movements within historic urban areas is also an important area to address As previously noted in relation to Question 3, vehicle damage and pollution do not only affect designated heritage assets, this should be amended to include all heritage assets. In addition, this is not a problem limited to urban areas alone and is relevant to the countryside as well. This should be reconsidered.	Historic Environment	Sections updated for the ISA report
217	Luton Council	5.9.9.	The Archaeology Team are concerned that there are only two opportunities identified for the historic environment in paragraph 5.9.9 as presented below. Our comments on these opportunities are set out below in red:	Historic Environment	See responses below.
218	Luton Council	5.9.9.	•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 volume, visibility and noise in the vicinity of a designated heritage asset and reducing existing detrimental effects on setting. It is extremely disappointing that the so-called 'principle opportunity' identified by 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.	Historic Environment	Sections updated for the ISA report
219	Luton Council	5.9.9.	•Asset enhancement has the potential to lead to an increase in tourism and associated revenue, and education opportunities associated with the region's cultural heritage. It has been noted above that this document has failed to identify a link between cultural heritage; health, well-being and creating a sense of place and identity. This is a missed opportunity and should be addressed. We recommend that the Transport Strategy consider the 'Heritage Counts' information which is publicly available via the Historic England website https://historicengland.org.uk/research/heritage-counts/	Historic Environment	Sections updated for the ISA report
220	Luton Council	Water Environment 5.10.6	Only identifies fluvial flood risk and mentions flood map for planning. All sources of flooding should be taken into account – including sea, surface water, groundwater and reservoirs, as they are all relevant to transport infrastructure. All the above are included in the long term flood risk maps also available on the gov.uk website	Water Environment	Sections updated for the ISA report
221	Luton Council	5.10.7	The reference to communities at risk is very vague. I assume this is alluding to the statutory Flood Risk Areas identified under Flood Risk Regulations 2009 during the second round of Preliminary Flood Risk Assessments (PFRA 2017). If that's that the case, this should be clearly stated. The Flood Risk Areas are currently going through the process of agreeing statutory Flood Risk Management Plans that would need to be taken into account for any infrastructure proposals.	Water Environment	Sections updated for the ISA report
222	Luton Council	5.10.12	"Upgrading existing infrastructure provides the opportunity to improve pollution control on older drainage systems" – features twice as an issue and opportunity. Delete from 5.10.12?	Water Environment	Sections updated for the ISA report
223	Luton Council	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	Water Environment	Sections updated for the ISA report
224	Luton Council	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 it the paragraphs	Climate Change and Greenhouse Gases	Sections updated for the ISA report
225	Luton Council	5.12.4	It would be useful to include the regional statistics based on the latest UK CP18	Climate Change and Greenhouse Gases	Sections updated for the ISA report
226	Luton Council	5.12.5	The UK is now committed to 100% reduction on the 1990 baseline by 2050, as per the The Climate Change Act 2008 (2050 Target Amendment) Order 2019	Climate Change and Greenhouse Gases	Sections updated for the ISA report
227	Luton Council	5.12.8	Despite this, the current estimates for temperature increases and changes to rainfall patterns are unlikely to alter significantly in the near future The "near future" in this case should be taken as the term of the strategy ie 2020-2050. Also, any upgraded or new infrastructure should be design with longevity and adaptability in mind. This comment is not helpful in such context.	Climate Change and Greenhouse Gases	Sections updated for the ISA report

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
228	Luton Council	5.12.9	Last bullet point. It may be useful to refer to the Tyndall Centre reports for every local authority in the UK - https://carbonbudget.manchester.ac.uk/reports/ It should be possible to establish a regional baseline and budget by amalgamation of the emissions of all relevant local authorities...	Climate Change and Greenhouse Gases	Sections updated for the ISA report
229	Luton Council	5.12.10	First bullet point. Perhaps the scenario of high temperature impact on road and rail infrastructure could be given more emphasis – especially in light of the evidence from the latest heatwave in late July 2019 when rail travel got severely disrupted for a number of days.	Climate Change and Greenhouse Gases	Sections updated for the ISA report
230	Luton Council	Table 6.1	broadly agree with the objectives	Climate Change and Greenhouse Gases	Observation noted.
231	Luton Council	Air Quality	•It would be useful if the potential air quality co-benefits of the drive towards decarbonisation could be quantified – a more holistic approach incorporating both climate change and AQ agendas would provide a more compelling case for the future policy decisions. One specific example would be if the carbon emissions calculator mentioned in para 2.1.6 could be expanded to consider impacts on PM and NOx emissions.	Climate Change and Greenhouse Gases	Sections updated for the ISA report
232	Luton Council	Air Quality	•One possible deficiency of the report is its failure to address PM2.5 pollution. Although not formally included in the LAQM regime, the health impacts of PM2.5 are well recognised. Furthermore, as recent media interest in Luton has demonstrated, there is increasing pressure on LAs to reduce PM2.5 levels and achieve compliance with the WHO annual average target level of 10µg/m3 (a target which Defra last year indicated should be possible in the foreseeable future). Obviously, any reduction in PM2.5 levels would also result in a reduction in the Public Health Outcomes Framework Indicator for mortality due to fine particulate matter.	Air Quality	Sections updated for the ISA report
233	Luton Council	Public Health Question 2	•Engagement with Network Rail and Train Operating Companies and a commitment to enhance their offer in terms of capital; •Support for evidence of how airports can be grown sustainably;	General	Outside the scope of the ISA
234	Luton Council	Public Health Question 3	•With regards to the health and air quality sections, could there be specific reference to (very) low emission zones, and how these may be implemented in urban settings;	Population and Equalities	Sections updated for the ISA report
235	Luton Council	Public Health Question 3	•Health objectives should also aim to enhance social wellbeing as well as physical and mental health. For example reducing social isolation and enhancing social capital through improved connectivity;	Population and Equalities	Sections updated for the ISA report
236	Luton Council	Public Health Question 3	•From a Community safety view, there is a perception of safety, what more can be done to promote road safety and ensure sustainable links are well used to deter anti-social behaviour;	Community Safety	Too detailed for a strategic level assessment.
237	Luton Council	Public Health Question 3	•Biodiversity, could a specific point about the use of green bridges be added and how this could support wildlife;	General	Too detailed for a strategic level assessment.
238	Luton Council	Public Health Question 3	•Streetscape, more could be said about the influence of design quality of streets and its visual effect. Expanding on this concept and recognising that a street is a public place where people are able to engage in various activities; and	General	Too detailed for a strategic level assessment.
239	Luton Council	Public Health Question 3	•Promote heritage, consider how heritage could be used to enhance the experience of sustainable travel with art	General	Too detailed for a strategic level assessment.
240	Luton Council	Public Health Question 3	•Climate Change and Greenhouse Gases: it is insufficiently ambitious to state that rural areas are dependent on private transport and suggest electric cars. Alternative public transport and active travel provision should be prioritised for those for whom this is possible (i.e. of the population currently 'dependent' on private cars, some would be able to change this behaviour if they had the opportunity, capability and means to do so). 'Private transport' could include a bicycle, if conditions are made safe for people to use them	General	Sections updated for the ISA report
241	Luton Council	General	1. Do you agree with the policy context and baseline information presented? We broadly agree with the policy context and baseline information presented, but feel it would be beneficial to present information not just for the whole study area but to disaggregate that into different sub -regions (perhaps based on LEP or Growth Board areas).	General	Too detailed for a strategic level assessment.
242	Luton Council	General	1. Do you agree with the policy context and baseline information presented? Specifically in relation to natural capital/ecosystems and the historic environment, those specialists are disappointed that little or no account is taken of local or non-designated elements, as it is often those that are at greatest threat from development of any type. Further comments from those two specialists on the policy context are included in their detailed responses appended to this letter, in order to ensure that greenspace and the historic environment receive appropriate acknowledgement, protection and enhancement in the Transport Strategy	General	ISA is necessarily strategic in scope
243	Luton Council	General	2. Are there any additional sustainability issues which should be identified? As a general observation we feel that the ISA scoping report has missed the opportunity to consider the link between the health and wellbeing of local communities and key aspects of their natural and built environment (in particular the role of greenspaces and the historic environment). It would be advisable to consider the social and economic benefits to the population in building a sense of place, community and sustainable movement that greenspaces and the historic environment can provide. Further comments on this are included in the detailed responses appended to this letter.	General	Sections updated for the ISA report
244	Luton Council	General	2. Are there any additional sustainability issues which should be identified? Air and noise pollution (and vibration) are considered but light pollution is not explicitly included within scope. From a health perspective exposure to artificial lighting is associated with negative health outcomes such as sleep disorders, depression, some cancers and CVD. Increasing artificial lighting may create sources of annoyance impacting on wellbeing, and be harmful to wildlife. Considering mitigation of light pollution may be particularly relevant as the assessment states objectives to increase access to transport services within rural areas, which are largely uninterrupted by artificial light. Also important to consider the impact of new lighting from transport structures which may conflict with the needs of specialist facilities (e.g. airports and aviation facilities) which are prominent in Luton.	General	Sections updated for the ISA report
245	Luton Council	General	2. Are there any additional sustainability issues which should be identified? As the Department for Transport have done in Chapter 2 of their recently published consultation document 'Decarbonising Transport' it would be beneficial to identify in section 5.12 which transport modes in the EEH area are contributing what relative proportion of greenhouse gases. This would also provide an opportunity in section 5.12.10, to de-prioritise modes of transport which contribute to climate change and encourage those which are carbon-neutral and/or promote health (i.e. active travel). Electric car infrastructure is not an adequate solution to the major change in transport behaviour which will be required to mitigate climate change.	General	Recommendations made for TS
246	Luton Council	General	3. Do you agree with sustainability objectives in Table 6.1? See detailed comments attached (comments above)	General	Sections updated for the ISA report
247	Luton Council	General	4. Do you have any other comments on the approach to assessment? See the detailed comments attached. (comments above)	General	Sections updated for the ISA report
248	Highways England	General	We noted that it doesn't address all the aspects of sustainability and it might benefit from evidencing why aspects are not included or, if they all are, where they all exist in the topics covered. A universal approach to structuring sustainability topics is now the UN Sustainable Development Goals. We acknowledge that not all will be relevant to the region or transport, we have embedded 12 goals in DMRB as a requirement of our design approach. UNSGD could form the backbone of the approach.		References to Highways England practice included.
249	Highways England	5.12.5	There maybe an error 5.12.5, the report should reference the Climate Change Act 100% net zero binding target, not the former 80%.	Climate Change and Greenhouse Gases	Sections updated for the ISA report
250	Highways England	General	1.Do you agree with the policy context and baseline information presented? We felt that there is a good range of topics considered, arguably sufficient to generate the relevant and positive sustainability objectives. Our view was that the region is assessed but not the strategy, perhaps the intent in the letter is wrong, not the assessment?	General	Strategy has been assessed, not region.
251	Highways England	General	2.Are there any additional sustainability issues which should be identified? More issues are mentioned in the assessment sections than are in the objectives summary. Active travel, food production and education/learning are in the report but will neither register as transport strategy objectives nor impacts to be addressed due to this absence. Three of the six strategic priorities for the DfT Decarbonisation Transport challenge are defined as 'accelerating modal shift to public and active transport, place based solutions and UK as a hub for green transport technology and innovation'. There is a strong correlation to EEH and these priorities which warrant active travel, food production and education/learning and innovation being part of the EEH Transport Strategy.	General	Recommendations made for TS

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
252	Highways England	General	3.Do you agree with sustainability objectives in Table 6.1? As topics with positive intent the sustainability objectives are good. They lack EEH geographic focus in their summary, have no obvious priority/hierarchy and may need quantification/values to really bite and influence the Transport Strategy. Perhaps the additional points above (or others/more) could be included.		References to Highways England practice included.
253	Highways England	General	4.Do you have any other comments on the approach to assessment? 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 sustainability objectives are going to be applied to the Transport Strategy should exist somewhere, we considered this as a standalone document.	General	More methodology provided in ISA report.
254	Environment Agency	General	Overall, we are satisfied with the proposed layout of the ISA for the matters within our remit. We are broadly supportive of the proposed scope for each of the chapters, although there are some minor changes or additions that we think would be beneficial, which are outlined further below.	General	Observation noted
255	Environment Agency	General	As with our response to your Outline Transport Strategy last October, we welcome and support the strong messages within the scoping report for issues including net (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.	General	Observation noted
256	Environment Agency	General	Do you agree with the policy context and baseline information presented? We have reviewed the 'Key messages' from the review (Table 4.1). The third bullet of 'Water Environment' refers to requirements for 'essential infrastructure' located in Flood Zones 3a and/or 3b – this should also note that any such proposal would also have to demonstrate that it can pass both parts of the flood risk Exception Test (https://www.gov.uk/guidance/flood-risk-and-coastal-change#The-Exception-Test-section).	Water Environment	Sections updated for the ISA report
257	Environment Agency	Appendix C	Biodiversity, NC & ES: - The references to the National Planning Policy Framework (NPPF) on page 18 still refer to providing net gains in biodiversity "where possible". Please be advised that the NPPF has been updated and strengthened in this regard and the statement "where possible" has now been removed from paragraph 170 (d). The 'Regional' review should now incorporate the Environment Agency's Local Natural Capital Plan for the OxCam arc.	Multiple	Sections updated for the ISA report
258	Environment Agency	Appendix C	Water Environment: - We are concerned at the apparent lack of plans, policies and programmes reviewed for this chapter. As a minimum, it should also include: o Environment Agency National Flood & Coastal Erosion Risk Management (FCERM) Strategy (due to be published spring 2020: https://www.gov.uk/government/consultations/draft-national-flood-andcoastal-erosion-risk-management-strategy-for-england). o Environment Agency's approach to groundwater protection – in particular position statement C4 (Transport developments): https://www.gov.uk/government/publications/groundwater-protectionposition-statements. o Anglian & Thames River Basin Management Plans (and the legislative Water Framework Directive): https://www.gov.uk/government/collections/river-basin-managementplans-2015; http://www.legislation.gov.uk/uksi/2017/407/contents/made. o Anglian & Thames Catchment Flood Management Plans: https://www.gov.uk/government/collections/catchment-flood-management-plans. o Thames Water Water Resources Management Plan (only seems to be Anglian Water included in the appendix): https://corporate.thameswater.co.uk/about-us/our-strategies-and-plans/water-resources.	Water Environment	Sections updated for the ISA report
259	Environment Agency	Appendix C	Air quality, CC & GHG: - It would be useful to include a reference to (and high-level details of) which local authorities have declared 'Climate Emergencies' in the study area, and in particular whether they have set any goals, ambitions or targets as part of those declarations that may have an impact on the Transport Strategy.	Climate Change and Greenhouse Gases	Sections updated for the ISA report
260	Environment Agency	5.6.1	Biodiversity: - Paragraph 5.6.1 (and your assessment) should also consider 'Local Wildlife Sites' which are locally designated. Your report indicates that it will consider 'local' designations, but has only mentioned national designations such as SSSIs, LNRs and NNRs.	Biodiversity	Sections updated for the ISA report
261	Environment Agency	5.6.9	Paragraph 5.6.9 mentions that biodiversity net gain is not yet mandated. However, as per our comment re: Appendix C above, we feel that it is worth making clear here that the NPPF has been strengthened regarding biodiversity net gain by removing the "where possible" condition.	Biodiversity	Sections updated for the ISA report
262	Environment Agency	General	Water Environment: - 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.	Water Environment	Sections updated for the ISA report
263	Environment Agency	5.10.6	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 only areas of flood risk are in the specific locations mentioned. It is also unclear why you refer to areas of Oxford and Northampton being "within Flood Zone 2 areas" when there are clearly also large areas of Flood Zone 3 in these locations.	Water Environment	Sections updated for the ISA report
264	Environment Agency	5.10.7	Paragraph 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 other locations at equal or much higher risk of flooding than those mentioned, for example Oxford.	Water Environment	Sections updated for the ISA report
265	Environment Agency	5.10.8	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 nevertheless can provide baseflows to local springs and watercourses and should be protected from pollution. It should also be made clear that SPZs are not always mapped around private water supplies, but do apply.	Water Environment	Sections updated for the ISA report
266	Environment Agency	5.10.9	Paragraph 5.10.9 (Future Trends) refers to the WFD. This is due to expire in 2027 and as we are no longer a member of the EU, it is currently unclear whether there will be a replacement for it after this date, and how any replacement might work. Therefore, good water quality practices and policies need to be embedded into the strategy to mitigate for any potential loss of the WFD.	Water Environment	Recommendations made for TS
267	Environment Agency	5.10.12	The third bullet point of Paragraph 5.10.12 (issues) refers to the upgrading of existing drainage infrastructure. This should be re-worded to reflect the issue, rather than the opportunity (which is reflected in the next paragraph).	Water Environment	Sections updated for the ISA report
268	Environment Agency	5.10.13	Paragraph 5.10.13 (opportunities) has not included integrating flood risk management and transport infrastructure in a multi-functional way. We spoke at length about this opportunity in our response to the Outline Transport Strategy and we feel that it should be included as an opportunity in the ISA.	Water Environment	Recommendations made for TS
269	Environment Agency	general	Are there any additional sustainability issues which should be identified? We are satisfied with the proposed sustainability issues in Table 6.1. However, please be mindful of our comments to the question above when considering whether to make further updates to the sustainability issues.	General	Observation noted
270	Environment Agency	General	Do you agree with sustainability objectives in Table 6.1? We recommend the following changes are made to two of the objectives (additions in bold text delete bits in red): Biodiversity: "To protect and enhance protected habitats, 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 bet gain 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."	General	Sustainability objectives updated for ISA report.

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
271	Environment Agency	General	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 ISA/SEA chapters. For example, there are likely to be strong links 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 emerges over the coming months and reflect in your assessment.	General	Sections updated for the ISA report
272	Environment Agency	General	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.	General	Observation noted
273	Cotswolds Conservation Board	general	Duty of regard Local authorities and other public bodies and 'relevant authorities' have a statutory duty to have regard to the purpose of AONB designation (i.e. to conserve and enhance the natural beauty of the AONB)1, with the expectation that adverse impacts will be avoided or minimised where possible. Given that the EEH is the Sub-National Transport Body (STB) representing 11 Local Authorities (LAs) and six Local Enterprise Partnership (LEPs) across the Oxford-Cambridge Arc and surrounding areas, this statutory duty also applies to the EEH. Under the duty of regard, the purpose of AONB designation should be taken into consideration at all stages of the EEH 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 5.8.14 of the ISA Scoping Report), AONB considerations should be a prime initial determinant for transport schemes in the AONBs, rather just being used to soften the impact of planned schemes. Additional 'good practice', in relation to the duty of regard, is outlined in guidance published by Defra2 and Natural England3 and in Appendix 4 of the Cotswolds AONB Management Plan 2018-20234. 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.	General	Comments noted. Action does not appear to relate to ISA.
274	Cotswolds Conservation Board	general	Tranquillity The response of the Chilterns Conservation Board has highlighted the importance of the tranquillity of the AONBs, for example, in relation to Tables 4.1 and 6.1 of the ISA Scoping Report. The Cotswolds Conservation Board's Tranquillity Position Statement provides guidance on how this issue should be addressed.5 In particular, it is worth noting that Section 4.5 of the Tranquillity Position Statement highlights the significance of proposals that would increase traffic flows - and / or HGV movements - in AONBs by 10% or more (or by 30% or more in less sensitive areas). The Board recommends that this should be a key consideration in the ISA. For example, Table 6.1 should include a 'Sustainability Objective' (under 'Noise & Vibration') to ensure that the Transport Strategy does not result in traffic flows within the AONBs being substantially increased.	Noise and Vibration	Sustainability objectives updated for ISA report
275	Cotswolds Conservation Board	general	Climate Change A key consideration, in relation to mitigating the impacts of climate change, should be reducing the need to travel. For example, an integral component of the Transport Strategy should be to promote and facilitate working from home and holding meetings via video conferencing. As well as reducing greenhouse gas emissions, this would also have significant benefits in terms of enhancing air quality, health, community safety and the economy. The Board recommends that this issue should be explicitly addressed in the ISA, for example, in Table 6.1 in the 'Sustainability Objective' for 'Climate Change and Greenhouse Gases' (for example, by having an objective to reduce the need to travel).	Multiple	Sustainability objectives updated for ISA report
276	Oxfordshire County Council	General	Public Rights of Way (PROW) and access to the countryside are not referenced in the scoping document. This weakness needs to be addressed as PRoW are directly relevant to transport and form part of several of the topic areas reviewed, particularly natural capital/green infrastructure (5.7) and also as a key part of health, landscape and townscape. Improving and maintaining PROWs can also have benefits in promotion of active and healthy travel, which is a significant opportunity to increase local journey choice and mitigate some of the environmental and safety impacts of vehicular transport. Reference should be made to highway authorities' statutory Rights of Way Improvement Plan, many of which contain assessments of networks and needs. As an example, Oxfordshire's RoWIP contains assessments of connected and disconnected networks for walkers and riders as well as communitygenerated maps of access needs.	Multiple	Sections updated for the ISA report
277	Oxfordshire County Council	4.1.4 Table C1 and C2	Whilst it is recognised that the list of policy documents in Appendix C is long, it would be useful to try and summarise some of the key documents here, focusing on those that have most influenced the key messages identified in table 4.1. This could either be added as another column in table 4.1, or as bullet point lists. Table 4.1: Historic environment section: Not all heritage assets have previously been identified and many areas have the potential to contain unidentified heritage assets of high significance that could cause a major constraint to any proposed development. This is reflected in paragraph 189 of the National Planning Policy Framework (2019). It is suggested that the first bullet point of this section should be amended to reflect this as follows: – conserve and enhance designated cultural and historical assets, both known and unknown, as well as those which are undesignated;	Multiple	Sections updated for the ISA report
278	Oxfordshire County Council	5.2	It would be useful for the review of indices of multiple deprivation to be backed with more detailed maps showing more specifically the geographical location of deprived areas than that currently shown in Appendix B. For Oxfordshire, these are found at the following weblink: https://insight.oxfordshire.gov.uk/cms/index-multiple-deprivation-2019	General	Too detailed for a strategic level assessment.
279	Oxfordshire County Council	5.4	How we plan and deliver transport improvements, and in particular, promote active modes and public transport, will have an important impact on healthy life expectancy, workforce productivity and health inequalities. To link with section 5.2 and highlight the increasing problem of widening health inequalities, this section should reference healthy life expectancy as well as actual overall life expectancy. The following weblink gives further detail: https://www.gov.uk/government/publications/health-profile-for-england/chapter-1-life-expectancy-and-healthy-life-expectancy	Health	Sections updated for the ISA report
280	Oxfordshire County Council	5.5.8	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 noted here given the disproportionate level of pedestrian and cycle casualties.	General	Sections updated for the ISA report
281	Oxfordshire County Council	5.6.1	This section should also include local wildlife and ancient woodland sites, especially as they are still protected under the NPPF. EEH local authority partners should be able to provide data on locations and areas covered.	General	Too detailed for a strategic level assessment. Partially addressed by response to another comment.
282	Oxfordshire County Council	5.6.6	The link between Green Belt development and less take up of sustainable travel is not necessarily the case. For example, there are currently several proposed developments sites located in the Oxford Green Belt which have been identified (including through local plan examinations) as having the potential to link in well to the existing and improved rail and bus public transport networks which pass through the Green Belt. Examples include development sites identified in the Oxford and Cherwell Local Plans close to Oxford Parkway Station to the north of Oxford, and development sites identified in the proposed South Oxfordshire Local Plan close to Culham railway station between Oxford and Didcot. This could actually have a positive environmental impact, should take up of public transport and active travel modes be higher at these sites due to their closer proximity to sustainable transport options and existing employment and facilities.	Biodiversity	Sections updated for the ISA report
283	Oxfordshire County Council	5.6.9	It would be useful to give the example of the East West Rail project's commitment to Biodiversity Net Gain here.	General	Sections updated for the ISA report

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
284	Oxfordshire County Council	5.8.1	Please can the reference to North Wessex Downs state, 'South of Swindon across to the Didcot/ Science Vale area in Oxfordshire.'	General	Too detailed for a strategic level assessment. Partially addressed by response to another comment.
285	Oxfordshire County Council	5.8.7	It would be useful to state key trunk road routes here as well- e.g. A14, A34, A43	Landscape and Townscape	Sections updated for the ISA report
286	Oxfordshire County Council	5.8.8	Major tourist attractions in the area also include Bicester Village	Landscape and Townscape	Sections updated for the ISA report
287	Oxfordshire County Council	5.9	The National Planning Policy Framework (2019) highlights that undesignated heritage assets of demonstrably equivalent significance to a scheduled monument will need to be considered in line with the same policies for designated sites. The EEH area will contain a considerable number of undesignated assets (as recorded on Historic Environment Records) and these could prove to be a constraint to any development which could impact on their setting. This issue should be highlighted in this section	Historic Environment	Sections updated for the ISA report
288	Oxfordshire County Council	5.9.7	Whilst the issue of resources is recognised, it is noted that formal planning response times can be often be reduced through early engagement with local authorities which can help to ensure that documents and proposals affecting the historic environment are agreed by all parties in advance.	General	Observation noted
289	Oxfordshire County Council	5.1	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 of flood risk areas would also be useful.	General	Sections updated for the ISA report
290	Oxfordshire County Council	5.10.10	This section should make reference to the Thames Water, Anglian Water and Cambridge Water's latest Water Resource Management Plans, as well as the work being done in regional groups, including the Water Resource South East group (see also comments under appendix C). Planning for future water supply in the context of climate change implications is challenging, and is likely to require new infrastructure such as water supply pipes or reservoirs that could have implications on the planning for future transport networks that will need to be understood and considered appropriately.	Water Environment	Sections updated for the ISA report
291	Oxfordshire County Council	5.10.11	It would be useful just to be clear at the end of this para that it is 'higher rainfall causing flooding.'	Water Environment	Sections updated for the ISA report
292	Oxfordshire County Council	5.10.13	An additional opportunity could be for new water infrastructure measures such as reservoirs and flood alleviation measures to be planned for alongside transport infrastructure improvements- e.g. integrating new active and healthy travel measures such as walking and cycling routes – both by building facilities within sites and providing new connections to existing and proposed external facilities.	General	Sections updated for the ISA report
293	Oxfordshire County Council	5.11	This section needs further information on the health impacts of air quality issues resulting from emissions. For example, this is documented, including the contribution of transport choices here: https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution	Air Quality	Sections updated for the ISA report
294	Oxfordshire County Council	5.11.13	A further issue is the adverse impacts of air quality on biodiversity and/ or sensitive conservation sites.	Air Quality	Sections updated for the ISA report
295	Oxfordshire County Council	5.11.14	Further opportunities identified here include: The opportunity to better manage air quality at the local level through new Local Air Quality Managements (LAQMs), as included in the 2020 Environment Bill. The opportunity for public transport improvements, both rail (e.g. EWR) and bus services, to contribute towards air quality improvements through reducing car journeys, especially if they operate using low emission rolling stock or vehicles (e.g. electric trains or buses) The opportunity for uptake of active and healthy travel to improve air quality, particularly in towns and cities across EEH	Air Quality	These are more the 'how' - modal shift already included in opportunities.
296	Oxfordshire County Council	5.12	Further context is needed on how clean growth (and reduced levels of carbon) can be enabled, for example through better construction practice for transport projects to reduce the embodied carbon, and through development and delivery of circular economy principles and practice.	General	Sections updated for the ISA report
297	Oxfordshire County Council	5.12.10	As with Air Quality, there are the significant opportunities for policy decisions to influence transport behaviour, and support moves to take up of public transport and active and healthy travel modes. Technology will also help enable opportunities to not travel when not needed- e.g. through working at home when possible. There are additional opportunities for better planning for clean growth (see comment above). It is suggested a change is made to the last opportunity bullet to acknowledge other low carbon vehicle initiatives- e.g. Hydrogen propulsion for goods vehicles, as follows: 'There is a need to support the continued increase in infrastructure to support the demand in electric cars vehicles and other low/zero carbon technologies.'	Climate Change and Greenhouse Gases	Sections updated for the ISA report
298	Oxfordshire County Council	5.14	The issue of impacts of freight movements on certain communities should be highlighted here, with opportunities to better manage these movements and moving towards quieter and more efficient freight vehicles acknowledged. The ISA can acknowledge the recent EEH freight study here, which outlines in more detail the issues and opportunities associated with better management of freight, including potential environmental benefits.	Noise and Vibration	Sections updated for the ISA report
299	Oxfordshire County Council	5.14.7	As with Air Quality and Climate change, significant benefits could be made through a switch to use of public transport and active and healthy travel transport modes.	Noise and Vibration	Sections updated for the ISA report
300	Oxfordshire County Council	Table 6.1	In line with comments made under the historic environment on Table 4.1 it is suggested that the first bullet of this section under 'key sustainability issues identified' is changed to the following: New and/or 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 line with comments under 5.10, it is suggested that the sustainability objective is amended to reference water supply, as in: To project water quality and supply, and manage and reduce the risk of flooding from all sources.	General	Sections updated for the ISA report
301	Oxfordshire County Council	Appendix C- Table C1	Water environment: regional: As well as the Anglian Water, Water Resources Management Plan, please can the Management Plans for Thames Water and Cambridge Water also be referenced. An addition, the 'Water Resource Requirements for South East England' document recently produced by the Water Resources South East (WRSE) group is also relevant: http://www.wrse.org.uk/wp-content/uploads/2020/03/WRSE-Future-Water-ResourceRequirements-March-2020.pdf	Water Environment	Sections updated for the ISA report
302	Oxfordshire County Council	Appendix C, Table C2	Oxfordshire section: Please can the following document be included: Oxfordshire Rights of Way Improvement Plan 2015-2025 www.oxfordshire.gov.uk/rowip	General	Sections updated for the ISA report
303	Buckinghamshire Council	General	1. Do you agree with the policy context and baseline information presented? In general, the policy context has been thoroughly researched, as evidenced in Appendix C. However, there appears to be some disconnection between the wording of certain Objectives, and the issues identified by the policy review. These are as follows (further disconnects are discussed for question 3, below):	General	Observation noted
304	Buckinghamshire Council	General	a. It seems as though the NPPF has only been selectively quoted in the current policy review 'Key Messages' table. There are further elements of this which would contribute to Landscape and Townscape, and potential additional objectives around reducing the number of long-distance trips (see comments below).	Landscape and Townscape	Sections updated for the ISA report
305	Buckinghamshire Council	General	b.Similarly, sustainable place making has been identified as a key factor in Health and Wellbeing, but this could also contribute to Landscape and Townscape, Economy, and Equalities objectives through sensitive design practices, encouraging small-scale local growth, and increasing attractiveness for vulnerable groups, respectively.	Multiple	Sections updated for the ISA report
306	Buckinghamshire Council	General	c.In general, the social aspects of sustainability (such as those contributing to a sense of place) are not expressed as strongly by the Objectives, compared to environmental and economic drivers. In particular, elements relating to place-making feel sparsely distributed throughout the Issues identified in Table 6.1, despite making up a larger proportion of the policy background and baseline data discussion	General	Sections updated for the ISA report
307	Buckinghamshire Council	General	d.TfL's Healthy Streets Approach should be added to the policy review, particularly with respect to urban housing growth across the EEH area. This has valuable insights with respect to population and equalities, health, community safety, and landscape and townscape.	Multiple	Sections updated for the ISA report
308	Buckinghamshire Council	General	e.Baseline years differ between datasets, ranging from 2011 census data to 2019 NOMIS labour statistics. The reasons for this should be explained. This could be due to these being the latest available data for each sustainability issue, but this should be explicitly stated.	General	Observation noted

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
309	Buckinghamshire Council	General	Buckinghamshire Council agree with the key messages from the policy review for Biodiversity, Natural Capital and Ecosystem Services, as set out in table 4.1. However, BC believe there are some key documents that have not been accounted for in Appendix C. Whilst this is unlikely to change the key messages (as these are very broad) BC would like to make EEH aware of the documents that have seemingly been omitted in the review. These are referred to as the assessment progresses. BC has sought advice from the Partnership Manager for Buckinghamshire and Milton Keynes Natural Environment Partnership [NEP] who have advised the following information and key regional documents [see Buckinghamshire Comments tab]	Multiple	Sections updated for the ISA report
310	Buckinghamshire Council	General	BC agree with the baseline presented in sections 5.6 (biodiversity) and 5.7 (Natural Capital and Ecosystem Services). Paragraph 5.6.6. 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.	Multiple	Sections updated for the ISA report
311	Buckinghamshire Council	General	2.Are there any additional sustainability issues which should be identified? Although supportive of the decarbonisation aim, this needs clarification, particularly with regard to emissions Scopes (i.e. direct emissions, emissions from electricity generation, indirect emissions from supply chain). There are also two potential areas for further objectives: a.One objective should be to reduce the overall number of long distance trips where shorter ones would be preferable. This would both increase support for the decarbonisation objective by reducing emissions at-source, and would also draw stronger links between housing- and transport planning, following wider calls from CIHT and academic institutions to do so. b.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 (rail lines, major roads) as sites for renewable energy generation. This would address the points raised in the Policy review around the need to create a low carbon economy.	General	Recommendations made for TS
312	Buckinghamshire Council	General	2.Are there any additional sustainability issues which should be identified? The 3rd bullet point in table 6.1 could be more specific to state "There is potential for transport developments to impact important sites of nature conservation, protected species and habitats, and ecological networks.	Multiple	Sections updated for the ISA report
313	Buckinghamshire Council	Sustainability Objectives	3.Do you agree with sustainability objectives? There should be more connection between the Sustainability Objectives and the baseline data. Whilst welcoming reductions in overall impacts, it would have been useful to have some quantification of the likely improvements needed in areas other than carbon emissions. This could either be by simply stating a baseline year against which to improve (or maintain) existing levels. Responses to the existing sustainability objectives are as follows:	General	Sustainability objectives updated for ISA report.
314	Buckinghamshire Council	Sustainability Objectives	a.Population and Equalities i.Broadly supportive of the points raised by this objective. However, reliability of transport is also a barrier to access; for roads in terms of upheaval caused by maintenance, and for public transport in terms of service punctuality	Population and Equalities	Sections updated for the ISA report
315	Buckinghamshire Council	Sustainability Objectives	b.Economy i.The identified affordability/out-migration issue does not directly align with the stated objective. Competitiveness for the region should not undermine the affordability of living there. This objective should also capture some of the social value of transport, e.g. improving quality of life. ii.It is unclear whether the connectivity referred to here is for commuters to access key employment clusters, or for these clusters to have access to one-another, or both of these factors. This position should be clarified, e.g. "To provide greater connectivity to- and between employment clusters across the region…" iii.Enhancing connectivity could have a rebound effect on sustainability, in facilitating out-migration due to improved transport services. This should be captured in the stated objective, e.g. "…and support economic success without driving unsustainable growth in long-distance commuting trips." 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.	Economy	Sections updated for the ISA report
316	Buckinghamshire Council	Sustainability Objectives	c.Health i.Ideally this objective should support the Equalities objective, through emphasising that greater connectivity should be achieved for all users.	Health	Sections updated for the ISA report
317	Buckinghamshire Council	Sustainability Objectives	d.Community Safety i.It's unclear whether "promote" is the right word to use regarding accidents. This is a key underlying principle of sustainable transport provision, rather than something for others to implement. E.g. "To deliver safe transport".	Community Safety	Sustainability objectives updated for ISA report.
318	Buckinghamshire Council	Sustainability Objectives	e.Biodiversity i.Suggest moving the words "in the region" to the end of the sentence, to emphasise that biodiversity net gain should take place within EEH, rather than through offsetting projects elsewhere.	Biodiversity	Sustainability objectives updated for ISA report.
319	Buckinghamshire Council	Sustainability Objectives	f.Natural Capital and Ecosystem Services i.As with the Biodiversity Objective, emphasise that environmental net gain needs to take place within the EEH area, rather than elsewhere.	Natural Capital and Ecosystem Services	Sustainability objectives updated for ISA report.
320	Buckinghamshire Council	Sustainability Objectives	g.Landscape and Townscape i.There is disconnection between the second sustainability issue and the stated Objective. The current Objective is grammatically nonsensical: buildings in new growth areas will not be able to conserve or enhance townscape character, as no buildings will have existed there previously. This Objective should instead emphasise the need to create a sense of place in new development areas, as per section 12 of the NPPF. This would go some way to redressing the general lack of connection between transport- and housing planning. ii.This would benefit from further insights from TfL's Healthy Streets Approach work – this should ideally be reviewed and added to Appendix C	Landscape and Townscape	Sustainability objectives updated for ISA report.
321	Buckinghamshire Council	Sustainability Objectives	j.Air Quality i.This objective should emphasise that "emissions" in this instance refers to pollutants such as NOx, PM10 etc., rather than carbon dioxide or other greenhouse gases.	Air Quality	Sustainability objectives updated for ISA report.
322	Buckinghamshire Council	Sustainability Objectives	k.Climate Change and Greenhouse Gases i.This objective needs to specify the aim of net zero transport-related greenhouse gas emissions by 2050, e.g. "To reduce greenhouse gas emissions to net zero by 2050…" ii.Addressing greenhouse gas emissions could also be a key driver of innovation in the region, and help to drive decarbonisation rather than merely support it elsewhere, e.g. "To reduce greenhouse gas emissions, drive measures to meet 2050 decarbonisation objectives, drive sustainable innovation in the region, and…"	Climate Change and Greenhouse Gases	Sustainability objectives updated for ISA report.
323	Buckinghamshire Council	Sustainability Objectives	l.Soil, Land Use, Resource and Waste i.In line with the Biodiversity- and Ecosystem objectives, this should aim at protecting and enhancing geologically/agriculturally significant land. ii.It is unclear what is meant by 'geologically significant' land. iii.The sustainability issues should recognise the need to preserve land within the EEH area's AONBs, in support of tourism, the Biodiversity/Ecosystem objectives, and carbon capture through re-wilding or woodland growth.	Soil, Land Use, Resource and Waste	Sustainability objectives updated for ISA report.
324	Buckinghamshire Council	Sustainability Objectives	m.Noise and Vibration i.This objective should emphasise that exposure to transport-related noise needs to be minimised for both transport users, and residents/businesses near transport corridors. ii.It would also be difficult to universally reduce exposure to noise, especially where new transport schemes or housing developments have been constructed on greenfield sites (i.e. where no anthropogenic noise was present previously). This should be clarified in terms of whether this means overall of certain pieces of infrastructure, numbers of people/habitats exposed to noise, or generally across the region	Noise and Vibration	Sustainability objectives updated for ISA report.
325	Buckinghamshire Council	Sustainability Objectives	Ecology It is recommended that the objective for biodiversity includes the protection of protected sites as well as habitats etc.	Biodiversity	Sustainability objectives updated for ISA report.
326	Buckinghamshire Council	Sustainability Objectives	Archaeology 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"	Historic Environment	Sustainability objectives updated for ISA report.

No.	Reviewer Initials	Section	Comment	Topic	Action Required/Summary of Action taken
327	Buckinghamshire Council	2.1.4	4.Do you have any other comments on the approach to assessment? 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 ISA report
329	Buckinghamshire Council	2.1.12	This should be updated to reflect the position of the RIS2 Strategic Roads Network Strategy, i.e. the pausing of further work on the Expressway Actions: Update to reflect current status of Expressway.	General	Sections updated for the ISA report
330	Buckinghamshire Council	5.2.5	g	Population and Equalities	Sections updated for the ISA report
331	Buckinghamshire Council	5.2.8	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 Equalities	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, so proportion is not relevant.
332	Buckinghamshire Council	5.2.13	Clarify the statement "The population… is growing… in age profile". Does this mean that the average age is increasing in the region?	Population and Equalities	Sections updated for the ISA report
333	Buckinghamshire Council	5.8.7	Arguably, the importance of the Chiltern Line is set to increase with the implementation of East West Rail. Sections of the Great Western Main Line also pass through the southern extremities of the EEH area. Actions: Add suggested major transport routes.	Landscape and Townscape	Sections updated for the ISA report
334	Buckinghamshire Council	5.8.8	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 attractors such as stately homes.	Landscape and Townscape	Sections updated for the ISA report
335	Buckinghamshire Council		Rights of Way There are a few places where safe access to horse riding routes (or 'multi-users routes') could be included in the document alongside walking and cycling. While it's appreciated horse riding doesn't provide a transport solution as such, equestrianism contributes significantly to the economy and good route provision provides open air recreation, health and well-being and road safety benefits to users. Cycle route provision, for example, between Waddesdon and Aylesbury; and Wendover to Great Missenden, which excluded horse riders, was met with strong criticism from equestrian groups. In the strategy at p.11, under health and well-being, there could be mention to prioritise walking, cycling and horse riding, and the section on community safety could highlight safety of walkers, cyclists and horse riders. At 5.4.13, enhancing walking cycling and horse riding routes could be including as well as at 5.73 and 5.7.14.	General	Sections updated for the ISA report