

Local Transport Plan and SEA Integration

Overview

1. This note provides an outline of how the Local Transport Plan was informed and checked against the outcomes of the Strategic Environmental Assessment (SEA), Habitats Regulation Assessment (HRA), and Community Impact Assessment (CIA).
2. Overleaf we provide a timeline against SEA Stages (which the HRA and CIA broadly align), the resulting actions, and outcomes delivered.

Summary

3. Due process was following for both the development of the SEA, HRA and CIA, as well as the integration with the Local Transport Plan.
4. As a result of the SEA, HRA and CIA, amendments were made to the:
 - vision, goals and objectives; and
 - policies.
5. In general, amendments were not made at a scheme level as all schemes are subject to further feasibility study and scheme development (including assessment).
6. Information gathered through the SEA, HRA and CIA at a scheme- and policy-level will be useful for feasibility studies and further scheme development.

Table 1: Local Transport Plan and SEA, HRA and CIA Integration

SEA, HRA, CIA Stage	Timescale (for final document)	Action	Outcome (and examples)
STAGE A: Setting the context and objectives, establishing the baseline and deciding on the scope (SEA only)	February 2019	<ul style="list-style-type: none"> Scoping Report issued to Statutory Consultees (Environment Agency, Natural England and Historic England) Statutory Consultee representation and professional recommendations to LTP team. 	<ul style="list-style-type: none"> Include Conservation of the Historic Environment as a wider objective: This has been included under the LTP environmental objectives There is a vision of Equity, but the definition is one of Equality. The LTP should strive for equity, not equality to reflect the difference in the population and urban vs rural difference: This has been changed from 'Equity' to 'Social' Include Health as a wider objective: This has been included under the LTP social objectives The Environment objective should read "Protect and enhance our environment...": The LTP environment objective has been updated Include reference to digital technology and how this is likely to impact future travel: The LTP document recognises the importance of digital technology on future travel and contains policies on this area
STAGE B: Developing and refining alternatives and assessing effects	May 2019 (reported with Stage C)	<ul style="list-style-type: none"> Professional recommendations to LTP team. 	No recommended amendments.
STAGE C: Preparing the Environmental Report / Habitats Regulation Report, and Community Impact Report (including assessment of policies and schemes)	May 2019 (reported with Stage B)	<ul style="list-style-type: none"> Professional recommendations to LTP team. 	<ul style="list-style-type: none"> Policy Theme 4.2: Maintaining and managing the transport network (Climate, Soils, Air quality, Material assets) - Include details on waste and material use within maintenance and capital projects, e.g. use of the waste hierarchy, maximising life and capacity of existing assets, using sustainably sourced materials with recycled content, reusing demolition material on new schemes etc. to support the principles of a circular economy: This has been addressed within Policy Theme 4.2. Policy Theme 10.1: Reducing the carbon emissions from travel (Climate, Air quality, Human health) - Policy 10.1.2 refers to electric vehicle charging points. To facilitate a switch to EV this could be widened to include EV infrastructure and information (not just charging points) e.g. priority parking for EV, an app with local maps on EV charging points and parking bays: This has been addressed within Policy 10.1.2. Policy Theme 10.1: Reducing the carbon emissions from travel (Climate, Air quality, Human health) - 'Low carbon economy' is mentioned in some of the other policies (e.g. built environment) but it would also seem to fit under policy 10.1 as reducing carbon emissions from travel will help contribute to a low carbon economy: This has been addressed within the text in Policy Theme 10.1.

			<ul style="list-style-type: none"> • Policy Theme 9.1: Protecting our natural environment (Flora and fauna, Population, Human health, Landscape, Water): <ul style="list-style-type: none"> – Biodiversity net gain is referred to in the policy overview but not in the policy wording. Consider bringing this out in the policy as well. – Strengthen emphasis on cohesion and connectivity of green space and green infrastructure within Policy 9.1.3. <p>This has been addressed within the Policy Theme 9.1 overview text and Policy 9.1.3.</p>
<p>STAGE D: Consulting on the draft plan or programme and the Environmental Report, Habitats Regulation Report, and Community Impact Report</p>	<p>June to September 2019</p>	<ul style="list-style-type: none"> • Scoping Report issued to Statutory Consultees (Environment Agency, Natural England and Historic England) • Statutory Consultee representation and professional recommendations to LTP team. 	<ul style="list-style-type: none"> • Natural England: We do have concerns that some of the proposed schemes have potential for significant adverse impacts on the natural environment. CPCA note Natural England’s concerns re the adverse impacts of some proposed transport schemes as part of feasibility studies and any scheme development. • Natural England: Our advice is that further work should be undertaken, in liaison with key environmental stakeholders, to gather evidence to inform a robust assessment of impacts to the natural environment and the deliverability of avoidance and mitigation measures. This, should be used, together with the proposed application of the user hierarchy, to select and prioritise the development of sustainable transport projects. CPCA note Natural England’s view that significant further work is required. Environmental consideration was given in assessment of schemes both as part of the LTP and corresponding SEA, HRA and CIA. The impacts of the schemes will be considered as part of any further prioritisation, feasibility, and scheme development. • Natural England: We note that the current LTP strategy is a ‘blended approach’ which focuses on a range of significant capital investments in highway, public transport and walking and cycling infrastructure, designed to support a significant increase in travel demand (expected to be generated by significant new development including ~100,000 new homes and employment growth) but tailored to the local geographic and travel context. We understand the need for a multi-modal approach to the Plan; however, we are concerned that the emphasis appears to be on delivering new major highways projects. This seems at odds with the proposal to apply the user hierarchy and to develop a sustainable transport network. CPCA note Natural England’s concerns re. the emphasis on large highway projects in the LTP, but disagree with conclusion. The LTP is primarily focussed on sustainable transport interventions to achieve mode shift, support development and economic growth and achieve wider social and environmental outcomes. All schemes are subject to further study and assessment. • Historic England: We welcome the reference to protect and enhance our environment in paragraph 1.45. We suggest that this is amended to read ‘preserve and enhance our built, natural and historic environment’. Environmental goal amended to 'Preserve and enhance our built, natural and historic environment and implement measures to achieve net zero carbon'.

			<ul style="list-style-type: none"> • Historic England: We welcome the notion of the consideration of space and movement and the idea that in certain locations priority should be given to modes that best preserve that specific setting or location. However, we would caution against an over simplistic use of this assessment narrative which could lead to further denudation of setting and wider historic environment. Consideration of setting and (historic) environment should apply to all schemes, irrespective of whether they are considered to be cultural treasures or not. The user hierarchy has been revised to better reflect the place and movement function of specific streets, which includes consideration of the historic environment. • Historic England: Transport and the environment (p76) - We welcome the reference in paragraph 2.43 to protecting and enhancing the natural, historic and built environment. However, much of the rest of this section focuses on biodiversity etc. More emphasis should be placed on what will be done in respect of protecting and enhancing the historic environment in relation to transport planning." Greater detail regarding protecting and enhancing the historic environment in relation to transport planning is provided in the Policies Annex. • Historic England: We welcome the inclusion of a policy for the historic environment. However, on page 145 in policy 9.2 the wording should be amended to read 'Conserving and enhancing our built and historic environments' in line with the wording in the NPPF. The final column should also be amended because it is more than just protecting the historic environment but also enhancing it. These same points apply to Annex 1 of the Plan, section 9.2 on page 94. We are concerned that there is no mention of archaeology in this section. The historic environment includes more than just built heritage. Policy 9.2 has been amended in line with this feedback, and reference provided to archaeology. • Historic England: The policy currently does not take account of how highways design and the historic environment can be successfully incorporated. We would expect to see schemes assess their impacts upon townscape, historic landscape and heritage assets and design accordingly. New roads, cycle paths and associated infrastructure, including signage and hard standings for example, will result in impacts on landscape and townscape. As such Historic England would want to be reassured that matters of siting, location and design will conserve the historic environment of the area. Therefore, it is important to ensure that transport appraisals properly assess all potential impacts on the historic environment to an appropriate level of detail. Policy 9.2.1 now includes the following: "include a proportionate assessment of any impacts on townscape, historic landscape and heritage assets within transport planning and major scheme appraisal, and increase opportunities to enhance the built and historic environment through major scheme delivery". • Historic England: All designated heritage assets should be referenced in the policy as well as non- designated heritage assets together with the potential for unknown archaeology. Mention should also be made of the importance of the setting of these assets. The NPPF
--	--	--	---

			<p>makes it clear that the significance of heritage assets may be harmed by development (which can include transport schemes) in the setting of heritage assets. Major heritage assets within the policy have been referenced, and the importance of protecting their setting.</p> <ul style="list-style-type: none"> • Historic England: When considering the relevant policy context it is important to note that local level documents will also be useful in setting the appropriate context. Figure 4 could helpfully draw on existing Conservation Area Appraisals and relevant Neighbourhood Plans in across the County. It would be helpful to consider the ability of the emerging Local Transport Plan to deal with the effects of development proposals on unknown heritage assets. For example, how will the plan deal with development proposals in areas with archaeological potential but with no known designated or non-designated heritage assets and does the Plan outline how this situation is to be addressed by prospective applicants or decision makers. All scheme development is subject to appropriate, legal / policy requirements with respect to archaeological assets (known or unknown) and heritage assets. • Historic England: It would be helpful to expand the assessment to include consideration of the effects of alterations to hydrological conditions as this could impact upon water dependent heritage assets including organic remains. This is particularly relevant for developments which may affect drainage which could affect soil chemistry resulting in dewatering for example. Noted and passed on to Mott MacDonald. • Historic England: Conclusion - We would recommend early engagement with Historic England in respect of specific schemes and highlight our pre-application advice service (further details of which may be found here: https://historicengland.org.uk/services-skills/our-planning-services/charter/Our-pre-application-advisory-service/). We remind the authority that harm to the historic environment should be avoided in the first instance (remembering that significance can be harmed by development within the setting of heritage assets). An assessment of impacts upon townscape, historic landscape and historic assets should be included in any future assessment of route and infrastructure options. This may necessitate Heritage Impact Assessment to understand the significance of assets and the likely impact of proposed development upon that significance. Historic England strongly advises that the conservation and archaeological staff of the affected local authorities and County Council conservation staff are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on local historic environment issues and priorities, including access to data held in the HER, how the policy or 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. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation or in
--	--	--	---

			later versions of the plan/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment. Noted - future recommendation for early engagement with statutory consultees on schemes.
STAGE E: Monitoring implementation of the plan or programme	Ongoing	<ul style="list-style-type: none"> Professional recommendations to LTP team. 	<ul style="list-style-type: none"> No recommended amendments. Targets to be agreed post-commission of Steer. Under ongoing review as per guidance.