



Herefordshire Local Transport Plan 2 2006/7 to 2010/11

Technical Annex 7

Strategic Environmental Assessment – Statement

This Annex comprises the statement summarising how environmental considerations have been integrated into the LTP2 following the Strategic Environmental Assessment of the provisional LTP2.

Herefordshire LTP2 Strategic Environmental Assessment (SEA)

SEA Statement

Purpose of Statement

This statement summarises how environmental considerations have been integrated into the LTP2. In line with the DfT's guidance, Strategic Environmental Assessment for Transport Plans and Programmes - TAG Unit 2.11 (December 2004), this statement covers:

- Ways in which responses to consultation have been taken into account, including how the plan was changed to take account of issues raised, or why no changes were made.
- Any changes or deletions from the plan in response to the information in the Environmental Report.
- Reasons for choosing the plan as adopted, and why other reasonable alternatives were rejected.
- Monitoring measures. The Environmental Report has already documented proposed measures concerning monitoring; these are now confirmed in light of the consultation responses.

The Environmental Report and Consultation Process

A Strategic Environmental Assessment (SEA) of the LTP2 was carried out in line with the requirements of the European Directive 2001/42/EC *on the assessment of the effects of certain plans and programmes on the environment*; known as the SEA Directive. The SEA was undertaken and a draft Environmental Report (ER) prepared in parallel with the preparation of the provisional LTP2. The draft ER underwent consultation prior to the submission of the final LTP2.

The consultation process involved the four statutory consultees: the Environment Agency, English Nature, the Countryside Agency and English Heritage. The draft ER was also placed on Herefordshire Council's website for open consultation with the public and other interested parties.

Each comment received during the consultation period was considered in line with the SEA Directive, associated guidance and in relation to the provisional LTP2. Where appropriate the LTP2 was changed to take account of the issues raised. However, some of the issues raised in the consultation exercise were not relevant to the LTP2 or were issues that had already been addressed in the provisional LTP2. All comments raised during the consultation period and their influence on the ER and LTP2 are summarised in the table at the end of this statement. Those comments that have resulted in changes to the LTP2 are described further below.

Alterations to the LTP2

No deletions have been made from the LTP2 as a result of the SEA, however, as a result of comments from statutory consultees on the draft ER, there have been four additions to the final LTP2, as follows. No comments were received from the public.

1. AONB Management Plans

The Countryside Agency suggested that Area of Outstanding Natural Beauty (AONB) Management Plans should be included in the list of local plans in the ER. ***AONB Management Plans have been included in the LTP2 policy and context section (Section 2).***

2. Outer Distributor Road

The Countryside Agency queried the inclusion of the Western Distributor in the appraisal packages of the ER, despite the omission of a named route in the LTP2 (referred to in this document as only the Outer Distributor). It was suggested that either the LTP2 should include a route for the Outer Distributor, or alternatively mention of the Western Distributor should be omitted from the SEA.

The Western Distributor was included in the appraisal packages of the ER as it was originally part of the Hereford Local Multi-Modal Study (HLMMS), which was discussed at some length. The LTP2 document states that the broad alignment of the Outer Distributor is to be progressed in consultation with stakeholders as part of the development of the LTP3, in line with the review of land use planning policy and development of the Local Development Framework. This will ensure that the route alignment supports the future development and transport needs of the City. However, the proposals for a new Link Road between the A49(T) Ross Road and the A465(T) Abergavenny Road may form part of a staged process towards developing the Outer Distributor route.

English Nature also suggested that greater certainty on the balance of environmental benefit / disbenefit should be established before significant investment is provided to the Outer Distributor. **A statement has been added to the LTP2 on the need to carry out a full environmental appraisal of the Outer Distributor as part of the option appraisal (included in Section 5).**

3. Landscape Character Assessment

The Countryside Agency stated that landscape mitigation measures in the ER focused on screening and street furniture and would not utilise the Herefordshire Landscape Character Assessment (LCA) to its full potential. The provisional LTP2 highlighted the quality of the landscape and referred to the LCA in Section 1. **Additional text has been added to the LTP2 (Section 2) to indicate the need to refer to the LCA for appropriate projects.**

4. Risk of Flooding

The Environment Agency noted that flood risk was not mentioned as an issue under Water, including the use of the Agency's flood zone maps as a constraint and consideration that development should have regard to flood risk. **The LTP2 has been strengthened with the addition of text on the need to consider flood risk on a scheme by scheme basis (Section 2).**

The Adopted LTP2 and Alternatives

The LTP2 was chosen as adopted because:

- The schemes fit well with the Shared Priorities of delivering accessibility, tackling congestion, safer roads and better air quality, as well as other strategies.
- The schemes have less significant environmental impacts than the alternatives assessed.
- The schemes provide deliverability and value for money.

Alternative schemes, as assessed through the HLMMS, consisted of:

- **A Metro and linked Park and Ride sites** – this was rejected because it was not considered value for money.
- **Inner eastern and western distributor roads and dualling of the A49** – these were rejected because the deliverability of the schemes was questionable and strong concern was expressed during the consultation that these would have an unacceptable impact on the environment and heritage.
- **An outer eastern distributor road** – this raised concerns during consultations on the environmental impact and the deliverability of the scheme.

However, it was supported that some form of new road building was required in order to reduce significant traffic overloading in Hereford City Centre; the outer western distributor having the least significant environmental impacts.

Monitoring Measures

The ER documents proposed measures concerning monitoring of the potential significant adverse environmental impacts of implementing the LTP2. These are confirmed following the consultation process. Monitoring measures include monitoring of baseline data during construction and follow-up monitoring on a scheme by scheme basis. Air quality monitoring and modelling work is also underway within designated Air Quality Management Areas (AQMA) but there are no modelling outputs to report yet.

Draft ER Consultation Comments Summary Table

The following table summarises comments from statutory consultees on the draft ER, and indicates how the SEA process and LTP2 have been influenced:

Consultee	ER Section	Consultation Response	Influence on Environmental Report	Influence on LTP2
Countryside Agency	2.3.11	Include AONB Management Plans in list of local plans.	AONB Management Plans included in list of local plans (Section 2).	AONB Management Plans added to LTP2 policy context section (Section 2).
	3.2.10	Assessment of environmental effects of transport network maintenance not included in SEA.	Environmental effects of maintenance works taken into account in Section 3.	Council has ISO 14001 (GEM) accreditation and highway maintenance is undertaken in accordance with GEM procedures (Section 8). No change to LTP2.
	4	Inclusion of Western Distributor in appraisal package despite omission from LTP2 and statement in Environmental Report (ER) that route has not been selected. Either LTP2 should include route so environmental impact can be assessed accurately, or Western Distributor should be omitted from SEA.	Western Distributor was included in the draft ER as it was part of the HLMMS. LTP2 refers only to an 'Outer Distributor', the named route of which has not yet been selected, as stated in the ER. Clearer wording included in Section 4.	LTP2 states route of Outer Distributor to be assessed during development of LTP3. Statement added on need to carry out full environmental appraisal of the outer distributor as part of option appraisal (Section 5).
	5.2.4	Landscape mitigation measures are focused on screening and street furniture. This approach is simplistic and will not utilise the Herefordshire Landscape Character Assessment (LCA) to its full potential. Landscape criteria in LCA may be relevant for setting targets and indicators in LTP2.	Focus of landscape mitigation expanded (Section 5). Landscape criteria from Herefordshire LCA taken into account.	The LTP2 highlights the quality of the landscape and refers to the Landscape Character Assessment in Section 1. Additional text added in Section 2 to indicate the need to refer to the LCA for appropriate projects.
	Consultee comments under 6. Also relevant to 3 and 5.	SEA should consider impacts of transport packages proposed on AONB Landscapes. Where a package or proposal will have an impact on an AONB this should be highlighted within the scoring methodology (Appendix C).	The Appendix C appraisal summary tables are from the HLMMS. Impacts of transport packages proposed on AONB landscapes and other protected sites taken into account (Sections 3 and 5).	No change to LTP2.

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Consultee	ER Section	Consultation Response	Influence on Environmental Report	Influence on LTP2
Countryside Agency	6.2.5	Develop specific Landscape indicators that can be used to monitor and direct EIA and Planning Applications for each development.	No indicators are included in the ER. The SEA Directive does not specifically require the use of objectives or indicators in SEA, but they are a recognised way in which environmental effects can be described. Objectives are included to allow the description, analysis and comparison of environmental effects throughout the SEA process. No change to ER.	No change to LTP2.
Environment Agency	3.2.7	No mention of flood risk as an issue under Water including use of EA's flood zone maps as a constraint and consideration that development should have regard to flood risk.	Wording on issues of flood risk, flood zone maps and considerations regarding development added to Section 3.	LTP2 would be strengthened by specific reference to need to consider flood risk. A reference to flood risk has been included in Section 2.
	5.2.2	Include mitigation issues associated with flood risk, e.g. flood storage loss and compensation.	Wording on mitigation issues associated with flood risk added to Section 5.	No change to LTP2.
	5	Suggest Park and Ride sites should be considered against flood risk maps.	All sites are assessed for flood risk by Herefordshire Council on a scheme by scheme basis. No change to ER.	No change to LTP2.
	5	Flood risk considerations for Rotherwas Access Road and the A49 Ross Road to Abergavenny Road.	Site specific comments taken into account by Herefordshire Council. No change to ER.	No change to LTP2.
English Heritage	(Scoping)	Not consulted at Scoping Stage. Consultation appears to have jumped to Stage D.	The potential environmental effects of transport packages in the LTP2 were considered in the HLMMS which underwent consultation.	No change to LTP2.
	All, particularly 4	ER should more clearly reflect the contents of the provisional LTP2.	Chapter 4 is based on the alternatives assessed in the HLMMS. Clearer wording included in Section 4.	No change to LTP2.
	All	Spatial and temporal scope of SEA. SEA should recognise that certain aspects will have longer term effects than the 5 year time span and impact beyond the spatial area for the LTP2.	Wording added to include potential longer term effects beyond LTP2 and wider spatial effects (Sections 3, 5 and 6).	No change to LTP2.
	1.6	Expand and more clearly explain derivation of SEA objectives. Translation into a sustainability framework for the SEA process is unclear. Recommend amendments to wording of objectives. Recommend two tier approach using headline objectives and sub objectives. No indicators are identified for monitoring stage.	Explanation for derivation of objectives expanded in Section 1 and some objectives reworded. The SEA Directive does not specifically require the use of objectives or indicators in SEA, however objectives have been included to allow the description, analysis and comparison of environmental effects throughout the SEA process.	No change to LTP2.

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Consultee	ER Section	Consultation Response	Influence on Environmental Report	Influence on LTP2
English Heritage	All	Consultee recommends a list of questions to be tailored to the LTP2 and plan area relating to features and areas of historical, archaeological and cultural value.	Herefordshire Council assesses heritage issues on a scheme by scheme basis. No change to ER.	No change to LTP2
	Appendix B and 2.3.11	Replace reference to English Heritage Environmental Policy Statement with PPGs 15 and 16. Add Regional Cultural Strategy to 2.3.11.	Reference to English Heritage Environmental Policy Statement replaced with PPGs 15 and 16 in Appendix. Regional Cultural Strategy added to Section 2.	No change to LTP2.
	3.2.10	Suggestions/considerations regarding Herefordshire Council Transport Asset Management Plan.	Herefordshire Council has considered comments specific to the Asset Management Plan. No change to ER.	No change to LTP2.
	3.2.11	Cultural, archaeological and architectural heritage section requires further detail and data on additional designations (sources of data provided).	Further detail and additional data added to Section 3.	No change to LTP2.
	3.2.12	Relate landscape and townscape to previous chapter and expand to include issues of character and quality of townscape and public realm.	Landscape and townscape section related to previous section in more detail and issues of character and quality of townscape and public realm addressed.	No change to LTP2.
	4	Concerns over HLMMS and how this relates to the SEA process. Further explanation needed to explain notation used in assessment tables. Suggest see HLMMS response letter dated 15 September 2003.	The HLMMS compares and assesses the environmental impacts of a range of transport packages. The study underwent consultation and was amended accordingly. Wording on assessment table notation expanded in Section 4.	No change to LTP2.
	5.2.3 and 5.2.4	Strengthen sections to provide a more positive and proactive approach to mitigation.	Wording added to Section 5 to provide a more proactive approach to mitigation.	No change to LTP2.
	6	Suggest inclusion of indicators, as mentioned above.	The SEA Directive does not specifically require the use of objectives or indicators in SEA, however objectives have been included to allow the description, analysis and comparison of environmental effects throughout the SEA process.	No change to LTP2.
English Nature	All	Various minor additions to text/comments throughout report.	Minor additions made to text throughout report where appropriate.	No change to LTP2.
	(comment in 1.5)	Query where light pollution, recreation network and wider sustainability matters, e.g. use of secondary aggregates instead of primary raw materials, are addressed.	Wording on light pollution and recreation network maintenance included in Section 3. Use of secondary aggregates already addressed in Material Assets section.	No change to LTP2.

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Consultee	ER Section	Consultation Response	Influence on Environmental Report	Influence on LTP2
English Nature	1.6	Recommend use of Guiding Principles for the West Midlands RPG review (Annex A of RPG11, ODPM June 2004). Should inform and influence LTP preparation and implementation, as well as policies in Chapter 9 of RPG.	No change to ER.	The LTP2 has been developed in the context of RPG and there are detailed references to the RPG throughout the document. No change to LTP2.
	1.6	SEA objectives should carry through to LTP2, as underpinning of vision and strategy and asserting that the LTP2 objectives are implemented in ways which positively secure these objectives	No change to ER.	One of the key LTP2 objectives is 'safeguarded environment' and this covers the collection of objectives identified in respect of the SEA process. No change to LTP2.
	1.6	Suggest additional objective regarding infrastructure for recreational use of the countryside and open spaces	SEA objective added to Section 1 to include maintenance and enhancement of access and infrastructure for recreational use of the countryside and open spaces.	The Rights of Way Improvement Plan in Section 9.6 covered the approach to this issue. No change to LTP2.
	2.3.11	Addition of BAP 2000 and 2005 Targets Review to list of local plans	BAP 2000 and 2005 Targets Review added to list of local plans in Section 2.	No change to LTP2.
	3.2.1	Addition of quantitative baseline data and targets to biodiversity section (sources of info recommended)	Further detail and additional data added to Section 3.	No change to LTP2.
	3.2.1	Question whether LTP2 mitigates for the effects of existing traffic emissions on habitats and whether the background pollutant level trends will increase despite the LTP2	No change to ER.	Air quality modelling work is underway – no outputs to report yet. This is confined to where AQMA have been designated. No change to LTP2.
	3.2.5	Suggest inclusion of Rights of Way for all purposes including recreation and upkeep of that infrastructure	Wording added on Rights of Way, accessibility for recreation and associated maintenance (Section 3).	The Rights of Way Improvement Plan in Section 9.9 covered the approach to this issue. No change to LTP2.
	3.2.7	Suggest a prioritised programme of replacement of point source drains that impact on sensitive sites to SUDs	Herefordshire Council assesses SUDs on a scheme by scheme basis. Wording added to Section 5.	No change to LTP2.
	3.2.8	Questions what measures are in place to shift freight to rail and replace older buses with greener vehicles	No change to ER.	The Low Floor Bus Project completed during LTP1 has initiated a step change in improving the bus fleet (Section 1). Rail freight is being pursued at a regional level (Section 9.8). No change to LTP2.

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	3.2.9	Suggest include quantitative targets for reducing greenhouse gas emissions through Nottingham Declaration	Quantitative targets for reducing greenhouse gas emissions through Nottingham Declaration included in Section 3.	No change to LTP2.
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Consultee	ER Section	Consultation Response	Influence on Environmental Report	Influence on LTP2
English Nature	4.2	Suggest greater certainty on the balance of environmental benefit/disbenefit should be established before significant investment is provided to the Outer Distributor	No change to ER.	Statement added on need to carry out full environmental appraisal of the outer distributor as part of option appraisal (Section 5).
	4.4	Suggest alteration to assessment tables regarding Western Distributor	Changes to assessment tables considered and altered where appropriate.	No change to LTP2.
	4.4	Suggest LTP2 should advance sustainable development by including alternatives which seek to control Hereford road traffic volumes in LTP2 through sub-regional and regional working, particularly regarding freight and HGVs	No change to ER.	The LTP2 Strategy focuses on controlling traffic and a key proposal is the Hereford Intelligent Transport System which will seek to improve efficiency of the network in advance of road building options. Regional support has also been secured for the Rotherwas Access Road which will remove HGV traffic in the Hinton residential area. No change to LTP2.
	5.2.4	Suggest inclusion of landscape enhancement zones or corridors around schemes to express intent to achieve landscape betterment, not solely minimising adverse effects on a sub-optimal or vulnerable existing landscape	Wording added to consider inclusion of landscape enhancement zones or corridors on a scheme by scheme basis (Section 5).	No change to LTP2.
	6.2.1	Provision must be made for continuity of appropriate follow-up land management of biodiversity assets affected by schemes and the monitoring of the effectiveness of that management	Wording added to Section 6 on follow-up land management of biodiversity assets affected by schemes.	No change to LTP2.
	6.2.2	Monitoring of the effects of existing transport network on soil and water desirable	No change to ER.	Whilst possibly desirable there are not sufficient resources for this other than in case specific circumstances. No change to LTP2.
	6.2.3	Assessment of effects of airborne pollutants on wildlife habitat interests desirable as context for the LTP2 goal to improve air quality (to benefit the natural environment)	No change to ER.	Whilst possibly desirable there are not sufficient resources for this other than in case specific circumstances. No change to LTP2.