PAPER E



Purpose: For Decision

Committee report

Committee FULL COUNCIL

Date 15 JUNE 2011

Title APPROVAL OF ISLAND TRANSPORT PLAN

Report Author REPORT OF CABINET MEMBER FOR HIGHWAYS,

TRANSPORT AND WASTE

BACKGROUND

1. This report sets out the background to the development of the Island Transport Plan (ITP), which when approved will become the statutory Local Transport Plan (LTP) for the Island and will help guide transport improvements here over the period 2011-2038.

OUTCOMES

2. To ratify the decision made by Cabinet on 10 May 2011 and approve the Island Transport Plan as the statutory LTP for the Island. A copy of the minutes of this meting can be found at www.iwight.com/council/committees/cabinet/10-5-11/minutes.pdf
A copy of the plan can be found at:
www.iwight.com/living here/environment/Transport Strategies/LTP3/default.asp

STRATEGIC CONTEXT

- 3. The ITP has been compiled in accordance with government legislation and guidance. The plan includes a local transport "vision" supported by six key "goals" and six "objectives". These accord with other local plans and policies including Eco-Island, the Island Plan and the council's Corporate Plan in particular the roads PFI scheme and regeneration and the economy.
- 4. The ITP reflects the importance of the PFI project and the need to improve the condition of the highways on the Island. This issue has been highlighted over a number of years as a consistent concern of residents and businesses.
- 5. Advantage has been taken of the flexibilities of the 2008 Local Transport Act to set different timescales for the two plan elements, with the strategy covering 2011 to 2038 to specifically tie in with the 25 year PFI contract and a two year lead in process covered by the Implementation Plan 2011-13.
- 6. In the light of uncertainty about future government funding allocations and the details of the recently announced 'Sustainable Transport Fund,' the

- Implementation Plan made available for comment, primarily set out how we plan to prioritise our spending.
- 7. The final ITP Implementation Plan gives more detail, whilst allowing the authority the flexibility to develop and deliver a programme of improvements which will take account of future funding levels and local needs.

CONSULTATION

- 8. The draft ITP was made available for a 12-week consultation period starting on 12 November 2010 accompanied by both the statutory Strategic Environmental Report (SEA) and the Habitat Regulation Assessment (HRA) Screening Statement.
- 9. The draft ITP and associated reports were posted on the council's website at www.iwight.com/transport with copies available for inspection at County Hall and Enterprise House. The draft ITP was considered by the council's Economy and Environment Scrutiny Panel at their meeting of 15 December 2010 and Island Quality Transport Partnership (QTP) at their meeting on 28 January 2011. The minutes of the Economy and Environment Scrutiny Panel can be found at www.iwight.com
- 10. The consultation period ended on Friday 4 February 2011 and the representations recorded, and considered in detail. A summary of the comments and suggested actions is included in Appendix A to this report.
- 11. Thirty five formal responses were received during the consultation period; ten respondents also completed the questionnaire. Many of the comments were of a similar nature and are summarised as follows:
 - That the 27 year plan is not suitably far-sighted
 - That the ITP concentrates too much on car use and road maintenance.
 - That the ITP fails to recognise importance of alternative forms of travel including public transport, walking and cycling.
 - That the ITP should be more proactive with regards to increasing bus use and improving facilities.
 - That the ITP fails to acknowledge existence and importance of local railway and value of the Community Rail Partnership.
 - That the ITP does not identify how council will embrace "big society" and work with transport operators and others.
 - That the ITP fails to recognise importance of Solent Local Economic Partnership (SLEP).
- 12. A number of similar concerns were raised by Royal Society for the Protection of Birds (RSPB) and Hampshire & Isle of Wight Wildlife Trust (HIOWWT) and statutory consultees Natural England (NE) in relation to the text in the ITP which gives details of the extent of works to be undertaken by the PFI project. Included in sections A4 and C.6.3 of the draft plan, the text explained that the PFI project will include the "design, reconstruction and maintenance of the entire highway network fence to fence."

- 13. The concerns raised here related to the inclusion of the "entire highway network" in the PFI as there are sections of road in environmentally sensitive and protected areas which those objectors feel are not sustainable. Natural England raised particular concerns regarding the future of the Military Road, where the road crosses the chines and water courses draining into the chines and the culverts under the road are arresting the natural recession of the chines.
- 14. The PFI project is seen by these objectors to be in conflict with the conservation objectives of the South Wight Maritime Special Area for Conservation (SAC) and the Compton Chine to Steephill Cove Site of Special Scientific Interest (SSSI).
- 15. Natural England and HIOWWT have made similar comments in relation to policy "SP7 Travel" in the Island Plan Core Strategy. Natural England has recommended as part of their response to the consultation on the plan that the "current policy wording should be amended to "most" of the Island public road network." They have also recommended that "the PFI project should be the subject of a Habitat Regulations Assessment (HRA) in accordance with the requirements of the Conservation of Habitats and Species Regulations 2010 to determine whether the project, alone or in combination with other plans or projects will have adverse effects on the integrity of any European or international site." Natural England have concluded that "the Habitats Regulation Assessment may exclude some sections of the Island's public road network from the project and we have therefore suggested that the Core Strategy should only commit to supporting proposed development associated with the final PFI project, after the Habitats Regulation Assessment process has been completed". Natural England would "wish to see a similar approach applied to the Island Transport Plan and the provision of more detailed information on PFI schemes relevant to European sites, to provide as robust an Habitats Regulation Assessment as reasonably possible at the strategic level".
- 16. Natural England note that the "existing HRA of the Draft Island Transport Plan has identified potential impacts of the PFI on European Site in sections 5.2.7, 5.3.3 and 5.3.4 and recommended several avoidance measures at 5.4, but these do not appear to have been carried forward to the plan itself."
- 17. On the basis of the above Natural England and HIOWWT have concluded that the draft ITP (and Island Plan Core Strategy) do not provide "the necessary level of certainty of avoiding adverse effects on the integrity of European and international sites required by the Habitats Regulations and so does not meet the test of soundness" as set out in Planning Policy Statement 12 (PPS12).

FINANCIAL / BUDGET IMPLICATIONS

- 18. The money available to spend on transport schemes comes from a number of sources. These broadly include:
 - Government funding allocations.
 - Council tax.
 - Developer contributions section 106.
 - Bids for additional funding

- 19. The government has over recent years moved towards a formulaic approach under which the level of funding made available for each local authority area is calculated by taking into consideration a range of local factors.
- 20. The maintenance formula was introduced a number of years ago, under this process issues such as length of roads, road condition, structures including bridges and number and condition of street lights are taken into consideration.
- 21. The government has recently introduced a similar process for calculating the money to be made available for integrated transport schemes walking, cycling, road safety and public transport. Under this new assessment the amount each local authority receives will now be based on a number of issues including, the local population, deprivation, accessibility, public transport use, level of congestion, air quality and numbers of people injured in reported traffic accidents.
- 22. The local transport block capital allocations which will be available are as follows:

Year	Maintenance (£000s)	Integrated Transport (£000s)	Total (£000s)
2011/12	3,179	754	3,933
2012/13	2,810	818	3,628
2013/14*	2,423	818	3,241
2014/15*	2,282	1,230	3,512

^{*} Indicative allocation for these years.

23. A significant and welcome change is that the money from government will now come entirely in the form of grant as opposed to supported borrowing as has generally been the case in the past. These figures have now been incorporated into the final Implementation Plan, which also gives details of how the council will maximise other funding streams including developer contributions, and bids for additional funding. One such bid is the recently released Local Sustainable Transport Fund, through which the council is seeking additional funds.

LEGAL IMPLICATIONS

24. The 2000 and 2008 Transport Acts place a duty on the council to prepare a local transport plan containing their policies and their proposals for implementation of those policies. The council shall keep the plan under review and can subject to consultation replace it.

EQUALITY AND DIVERSITY

25. An equality and diversity impact assessment was carried out as part of the preparation of the plan. The assessment did not identify any negative impacts. It recognised the positive benefits afforded by the plan and its policies and concluded that approach complied with equalities legislation. A copy of the full assessment is included on the council's website at :www.iwight.com/living_here/environment/Transport_Strategies/LTP3/default.asp

<u>OPTIONS</u>

- 26. A number of options exist and these are as follows:
 - Option a): To adopt the Island Transport Plan as the statutory local transport plan for the Island.
 - Option b): To incorporate the suggested amendments and adopt the Island Transport Plan.
 - Option c): Not to adopt the Island Transport Plan.

RISK MANAGEMENT

- 27. Not to adopt the ITP would bring with it a number of risks. It would leave the Island without a statutory plan and open to challenge by government.
- 28. The government may then choose to withdraw or withhold the council's transport funding. This would not only place an additional financial burden on the authority, but would also bring with it a reputational risk, given that the report has been made available for consultation.
- 29. To not take on board the comments from Natural England and others could potentially open the ITP and Island Plan Core Strategy up to legal challenge.

EVALUATION

- 30. The 2008 Local Transport Act requires all transport authorities to prepare a LTP and to keep the plan under review. The draft ITP has been prepared in accordance with government guidance and made available for comment for the required period along with the SEA and Habitats Regulation Assessment as required.
- 31. The government has given local authorities the freedom and flexibility to amend the plan if required. The strategy could be in place for 27 years and the council may well wish during that time to refresh the plan to take account of changing circumstances.
- 32. The council has considered the comments received during the consultation period and the response to these is included in Appendix A to this report. Particular consideration has been given to the comments made regarding the extent of works planned under the PFI project; in particular the view that these works could have an adverse impact on the conservation objectives of the European and international designated sites. Specific mechanisms have been put in place through the PFI to identify solutions which can be provided in harmony with the natural environment, although the details of those have yet to be established. These issues will be addressed as part of the scheme development and would be subject to the relevant statutory processes in place at the time.
- 33. The council has discussed this issue with Natural England which raised similar concerns during the consultation on the Island Plan and ITP and a number of amendments have been agreed as a result. The council

recognises the potential implications of the PFI works and if an HRA is required, then the findings of that assessment will inform the implementation of that project.

- 34. The wording in the Island Transport Plan has been revised accordingly and will now refer to the maintenance and improvement of "the entire highway network through the PFI project, subject to consideration of the relevant environmental protection legislation in place at the time." The council has also taken on board the text suggested in paragraphs 5.4.2 and 5.4.3.of the HRA screening assessment, which specifically refers to the PFI project.
- 35. The amendments that have been made to the draft ITP in response to the comments received and as part of the SEA and HRA process will address the concerns and comments made. These actions have ensured that the plan meets the test of soundness as set out in PPG12 and the plan now forms a sound and robust 27 year transport strategy for the Island.

RECOMMENDATION

36. Option a) To adopt the Island Transport Plan as the statutory local transport plan for the Island.

APPENDICES ATTACHED

37. Appendix A – Summary of comments received

BACKGROUND PAPERS

- Equality Impact Assessment*
- Habitats Regulation Assessment (Screening Statement)*
- Strategic Environmental Assessment, Post Adoption Statement (will be available after 20th April 2011)*
- * Background Papers available at : www.iwight.com/living_here/environment/Transport_Strategies/LTP3/default.asp

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Appendix A – Summary of comments received

Organisation	Comment	Response	Paragraph
Buses		·	
Isle of Wight Council	A5 – strategy (paragraph 5) Should make reference to people "eligible through age", rather than age 60+	Amend text to read "eligible through age".	Para A.5
Isle of Wight Council	Page 28 (table) should refer to "support the free fares scheme for those who are eligible on the basis of age." Rather than "support for over 60s bus scheme."	Amend text to read "support the free fares scheme for those who are eligible on the basis of age."	Table
Sandown Town Council	Cost of bus fares too high.	Outside scope of plan - comment noted.	No action
Sandown Town Council	"Over 60 concessionary fares should be for Islanders only."	No change required - bus scheme is national scheme.	No action
Resident	C.3.7 – "availability and affordability of transport" – cost of bus travel too expensive for those on lower income.	No change required - outside scope of plan.	No action
IOW bus and rail users group	Mention is made that the Council have supported the National 60+ Concessionary fares scheme seems to be at odds with recent council statements regarding curtailment on the Island?	No change required - outside scope of plan.	No action
Go South Coast Ltd	Bus priority – very little bus priority. 8 suggested locations.	Amend text - new bullet in C12.2 (journey time reliability and predictability).	C.12.2
Go South Coast Ltd	Roadside infrastructure - Should be a structured approach to Kassel kerbing. They should be installed at all stops including terminals and heavily used stops. Same is true for bus shelters.	Amend text - new partnership amend bus text.	C.7
Go South Coast Ltd	Need to have a much more structured approach to bus shelters – lit after dark.	No change required - council has policy of upgrading shelters.	No action
Go South Coast Ltd	Bus terminals / stations - Newport is the only good quality interchange / terminal facility. Other locations are very poor. Ryde is now an "unmaintained gateway" that presents an appalling image to visitors". Other main towns have very low level of bus infrastructure.	Amend text to refer to Newport bus station in amended C7.	C.7
Go South Coast Ltd	Quality Bus routes / corridors - No mention of Quality Bus routes / corridors in draft plan. Identification of routes would allow for joint working to improve bus patronage.	Operational issue - no change required.	No action

Organisation	Comment	Response	Paragraph
Go South Coast Ltd	Quality (bus) Partnership Current plan seeks to develop a Quality bus partnership. This has not happened and IWC "failed to discuss or progress the matter" There is a lack of dialogue with Bus Company at a policy or strategic level.	Amend text - new partnership amend bus text.	C.7
Resident	Social exclusion - Good bus service or cheap taxi essential alternative to car use.(C.12.3)	Amend text - new text in C7 refers to importance of taxis.	C.7
Resident	Control of buses how can council deliver when it doesn't run the buses? (C.7.2)	Amend text - new partnership amend bus text.	C.7
Resident	Bus patronage "2010 cutbacks mean that many had to give up bus travel" (C.3.5)	Noted - but outside scope of plan.	No action
Brading Town Council	Cuts in bus services will result in more problems for those without cars.	Amend text - new partnership amend bus text.	C.7
IOW bus and rail users group	There is mention to Bus Priority Measures but no detail of what is an important way to improve timing, reliability and modal shift.	Amend text - new partnership amend bus text.	C.7
Environment – Habita	ts Regulation Assessment and Strategic Environmental Asses	ssment	
RSPB	"In particular we welcome the work done in preparing the HRA".	Noted.	No action
RSPB	"Concerned that some key recommendations of the HRA have not been transferred to the draft LTP3".	LTP has been prepared in parallel with HRA and final plan will take account of recommendations.	A4, C.6.3 and elsewhere
RSPB	The text changes suggested in 5.4.1, 5.4.2 and 5.4.3 are "essential to ensure significant effects on European Sites are avoided and therefore should be included in draft LTP3. In the absence of these changes the draft LTP3 fails to meet the requirements.	LTP has been prepared in parallel with HRA and final plan will take account of recommendations.	A4, C.6.3 and elsewhere
Hants and IOW Wildlife Trust	A4 Concern that PFI will apply to "the entire adopted road network" and does not make exceptions for stretches of the A3055 at Brook and St Lawrence. Plan should make exceptions for these unsustainable stretches of road.	Wording to be considered along with text in Core Strategy.	A4, C.6.3 and elsewhere
Hants and IOW Wildlife Trust	Similar reference is made in core strategy and trust would like to see this removed from the core strategy.	Amend text - wording to be considered along with text in Core Strategy.	A4, C.6.3 and elsewhere

Organisation	Comment	Response	Paragraph
Hants and IOW Wildlife Trust	Concerns are raised in HRA under 5.2.7, 5.3.3 and 5.3.4 and trust is concerned that avoidance measures have not been transposed into LTP. Without these measures the current draft transport plan fails to meet the requirements of regulations.	LTP has been prepared in parallel with HRA and final plan will take account of recommendations.	A4, C.6.3 and elsewhere
Hants and IOW Wildlife Trust	Trust "has not seen the PFI projects but would wish to see them included within the plan and then subjected to a further Habitat regulation Assessment.	Amend text - Wording to be considered along with text in Core Strategy.	A4, C.6.3 and elsewhere
Hants and IOW Wildlife Trust	Without a list of projects there is no assurance that the projects would not have an adverse impact on the International and European sites. This is one of the requirements for testing whether a plan is justified and sound under the requirements of PPS12.	Amend text - wording to be considered along with text in Core Strategy.	A4, C.6.3 and elsewhere
Hants and IOW Wildlife Trust	Without these revisions we believe that the "current draft plan is unsound and not legally compliant with requirements of the Conservation of Habitats and Species Regulations 2010".	LTP has been prepared in parallel with HRA and final plan will take account of recommendations.	A4, C.6.3 and elsewhere
Natural England	A4 – improving highway condition – our PFI. "Natural England has a key concern regarding the stated commitment at section A4 regarding the delivery of the PFI contract"	Amend text - wording to be considered along with text in Core Strategy.	A4, C.6.3 and elsewhere
Natural England	We would recommend that the PFI project should be subject to Habitats Regulations Assessment in accordance with the requirements of the Conservation of Habitats and Species Regulations 2010.	Amend text - wording to be considered along with text in Core Strategy.	A4, C.6.3 and elsewhere
Natural England	HRA may exclude some sections of Islands public road network from the project and would wish to see this approach taken with the LTP	Amend text - wording to be considered along with text in Core Strategy.	A4, C.6.3 and elsewhere
Natural England	5.2.7, 5 3.3 and 5.3.4 The existing HRA of the Draft LTP has identified potential impacts of the PFI on European Sites and recommends avoidance measures. These do not appear to have been carried forward into the plan.	Amend text - LTP has been prepared in parallel with HRA and final plan will take account of recommendations.	A4, C.6.3 and elsewhere
Natural England	We consider that the plan does not provide the necessary level of certainty of avoiding adverse effects on European and international sites required by the Habitats regulations and does not meet the test of soundness.	Amend text - LTP has been prepared in parallel with HRA and final plan will take account of recommendations.	A4, C.6.3 and elsewhere

Organisation	Comment	Response	Paragraph
Natural England	SEA – NE "pleased to see that issues raised in SEA scoping report addressed in Appendix A of the assessment.	Noted.	No action
Environment			
Resident	Environment Lovely roads being ruined by "huge signs". "How large do they need to be?"(C.11)	Operational issue - signs are dictated by national regulations. "Decluttering" has taken place in some areas	No action
Resident	Plan should encourage the installation of solar powered street lights.	Already being considered through PFI.	No action
Resident	Light pollution – dark skies are a positive attraction and council should not increase the number of street lights and find better alternatives to "disgusting orange lighting on some roads".	Street lights are required to help improve road safety. Consideration is given to dark skies issue and new lights are designed to focus light and reduce up lighting.	C.10
Resident	"Clutter of road signs" – done with "disregard for beauty or tidiness" Go back to old fashioned ones or locally distinctive ones.	Operational issue - signs are dictated by national regulations. "Decluttering" has taken place in some areas.	No action
Resident	Verges and verge cutting – support for biannual cutting so as to save wild flowers and habitats.	Operational issue - council is aware of need to reduce impact on habitats.	No action
Isle of Wight Friends of the Earth	Page 19 – Challenges to be addressed. "The most important challenge by the long way is to reduce climate change".	Amend text - C.11.4 to be amended to encompass climate change.	C.11.4
AONB Partnership	Pleased to see positive references in C10 and C.11.1.	Noted No change required.	No action
AONB Partnership	Also support "pro active approach to landscape management and countryside activities" and management of transport routes."	Noted No change required.	No action
Resident	C.11.4 – "last 3 bullet points really important and should be in vision"	Noted - however vision is strategic not specific.	No action
Ferries			
Sandown Town Council	Cost of cross Solent travel needs to be reduced.	Noted - but outside scope of plan (and council influence).	No action
Havenstreet and Ashey Parish Council	"Another Solent ferry operator to reduce prices".	Noted - not within scope of plan. Issue has been considered by council in Ports Enquiry.	No action
Resident	Cross – Solent Ferry services Plan makes little reference to cross – Solent ferry services.	Amend text - Revise C.9.3 slightly to reflect importance of cross Solent links.	C.9.3

Organisation	Comment	Response	Paragraph
Resident	Ferries are vital to Islands economy.	Noted - see response above.	No action
Resident	Existing ferry terminals restrict growth.	Noted - see comment below.	No action
Resident	Existing terminals are the only from marine point of view the only practical locations.	No change required.	No action
CycleWight	C6 Assertions like "cross Solent improvements are key to Islands economic success needs to be challenged" will they fit with sustainability objectives and decrease traffic on our roads.	Amend text - C.9.3 to be amended to better explain benefits afforded by cross solent links.	C.9.3
General			
Shanklin Town Council	No comment.	Noted No change required.	No action
RSPB	Welcome work done preparing LTP3.	Noted No change required.	No action
Totland Parish Council	No Comment.	Noted No change required.	No action
CycleWight	A7 No comment.	Noted No change required.	No action
CycleWight	Section B – no comments.	Noted No change required.	No action
Go South Coast Ltd	Conclusion -Draft plan is "doomed to failure as it does not recognise the need for clear and strong strategies to achieve modal shift". "No coherent strategy in the draft plan, let alone any vision as to how this can be achieved."	Amend text - new partnership text.	C.7
Resident	Documents do not constitute a Transport Plan. Focus is purely on roads .Very narrow approach.	Amend text - Text to be broadened to reflect importance of sustainable travel (C.7).	C.7
Resident	No consideration of future transport options.	Amend text - Text to be broadened to reflect importance of sustainable travel in expanded C.7 and partnership text.	C.7
Resident	Conclusions Plan "full of good intentions – but can they be delivered"?	Noted - delivery can only be in partnership with operators and others.	No action
Isle of Wight Council	Plan should encourage trench sharing by utilities.	Noted - future consultation to include group.	No action
Resident	Future consultation should include Association of Local Councils.	No change required - operational issue being considered as part of PFI.	No action
Isle of Wight Council	<u>A5 – strategy (paragraph 5)</u> Should make reference to "those who suffer severe and enduring health problems" rather than "mental illness".	Amend text - Text to be amended to read "those who suffer severe and enduring health problems"	A.5

Organisation	Comment		Paragraph
Isle of Wight Council	A3 Para 1 – should refer to "town plans".	Amend text - Final plan to include reference to town plans.	A.3
Isle of Wight Council	A9 Para 2 – too many "councils" in website sentence.	Amend text - Final text to be amended accordingly.	A.9
Isle of Wight Council	B2 - web link should be underlined.	Amend text - Text to be amended accordingly.	B.2
Isle of Wight Council	C.7.1 Para 2 – text should include reference to Solent Local Economic Partnership (SLEP).	Amend text - Text to be amended to refer to SLEP (New text added in revised A3).	A.3
Isle of Wight Council	C.9.4. Para 1- which tourist destinations and what evidence?	Amend text - Increased traffic can be experienced as a result of festivals and special events. Text should be revised to clarify this.	C.9.4
Isle of Wight Council	C.10.1 Para 1 – AQMA's, where are the problem areas?	Amend text - Monitoring has shown areas to be close to Newport and at Lake.	C.10.1
Isle of Wight Council	C.11.1 Para 1- replace" landscape" with "diversity."	Amend text - Text to be amended accordingly.	C.11.1
Isle of Wight Council	C.11.3 Para 2 – text should include Core Strategy.	Amend text - Text to be amended accordingly.	C.11.3
Isle of Wight Council	<u>C.12 – objectives</u> – supported.	Noted.	No action
Newport Parish Council	Considered at parish planning meeting on 20/01/11. Decided that because of the "strategic, non-specific nature of the document there was no need for them to comment".	Noted – acknowledged, no change required.	No action
RSPB	"Document provides a robust record of the existing environmental, social and economic conditions on the Island".	Noted.	No action
RSPB	"Note that draft LTP sets overarching transport strategy for period up to 2038, but does not include detailed strategies. We would welcome the opportunity to comment on the proposed transport projects once details are available".	Detailed delivery programme will be developed using priority ranking system taking into consideration money available.	No action
Resident	"Changed approach to previous plans".	Noted - plan follows guidance and has taken a more strategic approach.	No action
Isle of Wight Friends of the Earth	Implementation Plan – the priority ranking system is "key to objective assessment" of potential transport schemes" Who will decide the weighting? "Will it be open to consultation and be applied absolutely consistently" or "altered to achieve outcomes".	Noted - weighting has been agreed as part of plan preparation process.	No action

Organisation		Comment	Response	Paragraph
Community Partnership	Rail	The forward mentions since the adoption of LTP2 good progress with transport delivery. Where are these with services being cut, Ryde interchange undelivered, Wightbus disbanded, withdrawal from the CRP and bus patronage down.	Noted - however council believes that good progress has been made in a number of areas. Reduced delivery is as a result of financial implications.	No action
Community Partnership	Rail	Bids should be made to the Regional Growth fund and LSTF.	Noted - council is working with others on the submission of a LSTF bid.	No action
Community Partnership	Rail	Document is "poor and disappointing".	Noted - document is draft and has been revised to take on board comments made.	No action
Resident		C.6 – council should do work rather than employ profit making contractors.	Noted - not in scope of plan.	No action
Brading Council	Town	C.12.6 Transport should be a service not a luxury.	Noted - no action required.	No action
Brading Council	Town	Centralising efforts in Newport leaves peripheral areas neglected.	Noted - transport improvements relate to entire Island (especially PFI) Centralisation is largely a planning issue.	No action
Brading Council	Town	The whole plan is about PFI – but is this "economically sound for the IOW.	Noted - plan has been expanded to address wider issues.	No action
Brading Council	Town	An "unrealistic wishy - washy document".	Noted.	No action
CycleWight		Need to look at and adopt best practice.	Noted - operational issue. Council is aware of best practice through membership of a number of groups and organisations.	No action
CycleWight		A6 Tells us what we already know.	Noted - no change required.	No action
CycleWight		C4 Table has anomalies and ticks seem to be subjective. Road safety and health is important to economy. Good health gives equality of opportunity.	Amend text - Table to be amended.	Table
CycleWight		C5 Demand management would lead to traffic reduction.	Noted - amendments to plan will address wider transport issues.	C5, C7 and elsewhere
Havenstreet Ashey Parish C	and council	Better link (raising bridge) required between east and west Cowes.	Previous proposals to create a fixed link have been too expensive.	No action
IOW bus an users group	d rail	"Nobody could disagree with strategy which is sufficiently wide ranging as to be all embracing".	Noted.	No action

Organisation	Comment	Response	Paragraph
IOW bus and rail users group	Text "recognising that for some the car is the only option" seems to contradict with statement people without access to public or private transport can be excluded for society".	Amend text - Text has been amended to support alternatives and broaden travel choice.	A5 , C7 and elsewhere
IOW bus and rail users group	Implementation part of the plan seems to be lacking in detail.	Implementation Plan has established the process (priority ranking system) final schemes will be drawn up using this process.	No action
Hants and IOW Wildlife Trust	Trust believes that more reference should be made to LTP2 "where provisions differ significantly from the current adopted LTP2".	LTP 3 will replace LTP2.	No action
South West Trains	Plan recognises importance of working with operators – but does not explain how this will be done.	Amend text - New partnership text.	C.7
Resident	Council makes much of its "green" credentials but little to support the rhetoric.	Amend text - Revised text in C7 and elsewhere should help explain approach to sustainable travel.	C.7
Resident	Questionnaire for consultation is meaningless without details as to what policies the council plans to pursue in order to achieve them.	Noted - no action required.	No action
Operational			
Go South Coast Ltd	Road condition - Overhead obstructions are a problem for high vehicles.	Operational issue.	No action
Go South Coast Ltd	Reliance on national schemes - "Odd that Council makes play of its support for free travel when these are mandatory" and not "a real measure".	Council is part of national scheme.	No action
Parking			
Go South Coast Ltd	Parking strategy Draft plan "makes no mention to parking strategy". "Simply no way that measures set out in the plan will deliver objectives without a parking strategy to reduce car use in Newport".	Amend text - New text added in C.9.2.	C.9.2
Isle of Wight Friends of the Earth	Page 20 – C.12.2 Objective B "one of the key techniques to managing traffic" will be control of parking". This is a major emission for a strategy supposed to last for the next 27 years.	Amend text - New text added in C.9.2.	C.9.2

Organisation	Comment	Response	Paragraph
Isle of Wight Friends of the Earth	Page 23 – table Parking enforcement certainly rates a tick against "C – protect and enhance the environment and quality of life".	Amend text - Table to be reconsidered and tick added if appropriate.	Table
CycleWight	Plan should contain clear demand management strategy – including car parking strategy.	Amend text - New text added in C.9.2.	CV.9.2
CycleWight	C.12.6 "Parking controls should be part of the toolbox of measures".	Amend text - New text added in C.9.2.	C.9.2
Ryde Town Council	Increased parking required in the Ryde Area.	Comment noted - No change.	No action
Havenstreet and Ashey Parish Council	Increase car parking charges for "larger vehicles". (engine size)	No change required. The council has recently revised its approach to lower emission vehicles as part a parking review.	No action
IOW bus and rail users group	Plans to increase modal shift and control of parking are missing.	Amend text - New text in C.9.2. While amended text in C7, and C.12.6 should help address broader sustainable transport issues.	C.12.6
Go South Coast Ltd	Location of new development - "No recent evidence that consideration is being given to access by public transport.". Location of Vestas poor in terms of access by public transport.	Planning decisions are based on number of considerations including land use and transport.	No action
Isle of Wight Council	<u>C.7.1 Para 3 – last paragraph</u> . Further update on model was also prepared. Is work solely funded through 106 money?	No change required - works are to be funded through developer contributions (S106).	No action
Resident	C.9.6 – "Consideration of travel to new development really important - walking, cycling and safe accessibility".	Noted - text in C.9.6.	No action
Rail			
Resident	No mention of the railway at all	Amend text - New text added in C.7.	C.7
Resident	"Disappointed to note little mention if any of supporting mainline railway (Ryde Pier head to Shanklin and associated rail bus to Ventnor).	Amend text - New text added in C.7 and elsewhere.	C.7
IOW Steam Railway	Note with dismay that the document contains no mention of Island Line Trains apart from one word in objective C12.	Amend text - New text added in C.7 and elsewhere.	C.7
IOW Steam Railway	IOW steam railway is one of the Islands leading visitor attractions and has good links to Island line trans.	Amend text - New text added in C.7 and elsewhere.	C.7
IOW Steam Railway	Plan should refer to importance and convenience of "excellent ferry / rail connections".	Amend text - New text added in C.7 and elsewhere.	C.7

Organisation	Comment		Paragraph
IOW Steam Railway	"Island Line should feature more prominently in Transport Plan Strategy".	Amend text - New text added in C.7 and elsewhere.	C.7
IOW Steam Railway	SEA – Appendix E item 1 "note with pleasure" that text refers to the retention of distinctive transport related heritage features such as rail arches".	Noted.	No action
Community Rail Partnership	A3 – partnership. How does the council intend to have input following withdrawal from CRP?	Amend text - Council has record of good partnership working with rail (e.g. Ryde St Johns Bridge, Ryde Tunnel, Sandown park and ride, Ryde St Johns park and ride) and will continue to work in partnership. New text.	C.7
Community Rail Partnership	SEA – "Appendices, Policy and Plan Review – Accessibility and Transport". Rail – LTP3 should support an increase in rail usage" Where is this reflected in the LTP3 document?	Amend text - New text added in C7 and C.12.6.	C.7
Community Rail Partnership	No mention in plan of CRP nationally recognised stakeholder group.	Amend text - New text added C.7 and elsewhere.	C.7
IOW bus and rail users group	Plan fails to recognise importance of the railway.	Amend text - New text added C.7 and elsewhere.	C.7
IOW bus and rail users group	Plan should encourage the reinstatement of the passing loop at Brading – all trains could then meet the catamarans.	Amend text - New text added C.7 and elsewhere.	C.7
South West Trains	Concern as to how the railway fits with the islands future plans now the council has withdrawn from the Community Rail Partnership?	Amend text - New text added C.7 and elsewhere.	C.7
South West Trains	A5 – fails to recognise the importance of the Islands railway.	Amend text - New text added C.7 and elsewhere.	C.7
South West Trains	C9.3 Cross Solent issues – rail is an important link on both sides of the Solent.	Amend text - New text added C.7 and elsewhere.	C.7
South West Trains	Plan contains no reference to Community Rail Partnership and work to encourage sustainable travel.	Amend text - New text added C.7 and elsewhere.	C.7
South West Trains	LTP gives the impression that local railway is forgotten.	Amend text - New text added C.7 and elsewhere.	C.7
South West Trains	Recognising that the Island is now part of SLEP any future bids to Local Sustainable Transport Fund or Regional Growth Fund should include the local railway.	Council is looking to submit bid to LSTF and will be working with CRP and others.	No action

Organisation	Comment	Response	Paragraph
South West Trains	South West Trains wishes to work in partnership with the Council but cannot see the mechanism by which this can be done.	Amend text - Council has record of good partnership working with rail (e.g. Ryde St Johns Bridge, Ryde Tunnel, Sandown park and ride, Ryde St Johns park and ride) and will continue to work in partnership. New text.	C.7
Road Safety			
CycleWight	C8.1 Council are to be supported on the road safety campaigns that they have run including 20mph which support walking and cycling.	No change required.	No action
Roads and Congestion	on		
Resident	Crumbling Island. Volume of traffic. Coaches, HGVs. Pollution and impact on the environment.	No change required. PFI bid will help address poor condition of roads.	No action
Go South Coast Ltd	Lack of commitment to implementing traffic measures.	No change required - operational issue.	No action
Go South Coast Ltd	Multiple road closures hinder buses.	No change required - operational issue.	No action
Resident	Traffic Lights – Coppins Bridge Traffic lights on Coppins Bridge should be turned off at night.	No change required. Timings have recently been adjusted to cater for off peak usage.	No action
Resident	Traffic Lights – Stag Lane Traffic lights at Stag Lane should be turned off until site occupied.	No change required. Traffic lights were required as part of planning approval and access to the site is required for site vehicles.	No action
CycleWight	Traffic management is important but to keep traffic flowing is not an objective in itself.	No change required. Free flowing traffic is important in terms of reducing congestion and pollution.	No action
Resident	Plan should consider future expansion and necessary road improvements.	No change required - plan addresses road improvements in C.7.1 and as part of PFI.	No action
Resident	Cowes to Newport Road Suggestion that High occupancy vehicle lane could be added to widened Medina Way.	No action required - Medina Way is not considered to be of sufficient width or length for such an initiative.	No action
Resident	Objective B – should read "maintain and improve journey time reliability and predictability for all road users".	No change required. Comment noted – but issue also relates to journeys by train and on foot. Amend text to state "predictability for all".	No action
Isle of Wight Council	A5 Para 4 - growing congestion, where is it a growing problem?	No change required - Congestion occurs at locations around the network at peak times. Locations include outside schools and a key traffic junctions.	No action

Organisation	Comment	Response	Paragraph
Resident	"There is little evidence at my reading to support the need to improve the highway infrastructure for the benefit of the Island visitor in their private car".	No change required - Highway improvements will be beneficial to all road users including those who travel by bus and cycle.	No action
Resident	Risk that improving roads will generate more traffic.	No change required. Improved roads will benefit all road users including bus users and cyclists	No action
Resident	Concern that the plan relies heavily on the PFI.	Amended text - Has helped explain broader sustainable transport issues (C7 C.12.6 and elsewhere).	C.7
Isle of Wight Friends of the Earth	SEA is largely predicated on a reduction in traffic growth and modal shift – yet "strategies to achieve this are weak or absent". The "only concrete proposals are for enlarged roundabouts".	Amend text - New text C7 C.12.6 and elsewhere has helped to explain broader sustainable traffic issues.	C.7
Isle of Wight Friends of the Earth	Page 11 - C.7.1 Land use planning, improving these roundabouts and junctions will only serve to increase traffic, which tends to grow to fill the road space".	No change required - Highway improvements will be beneficial to all road users including those who travel by bus and cycle.	No action
Resident	Consideration should be given to possibility of express roads – new 2 lane roads linking main towns i.e. Newport to West Wight and Shanklin to Ryde.	No change required. Suggestion not considered to be necessary or achievable in Island and funding context.	No action
CycleWight	Plan contains few plans to reduce traffic congestion.	Amend text - New text C7 and elsewhere has helped to explain broader sustainable traffic issues.	C.7
CycleWight	C5 "PFI is not a silver bullet" and "not the only tool on the box".	Amend text - New text C7 and elsewhere has helped to explain broader sustainable traffic issues.	C.7
Ryde Town Council	Enhancement of highway assets seen as highest priority.	Noted - no change required .	No action
Ryde Town Council	Need to improve east west traffic flow across Ryde.	No change required.	No action
Havenstreet and Ashey Parish Council	"Improved maintenance of Island roads" identified as a priority.	No change required. PFI will address maintenance issues.	No action
IOW bus and rail users group	Plan has no answer to local traffic congestion.	Amend text - New text in C.7 and elsewhere should help improve travel choice	C.7
Isle of Wight Ramblers	PFI – the replacement of all roads will cause utter chaos especially in the summer months.	No action required - PFI works will be planned so as to help reduce hold ups and delays.	No action

Organisation	Comment	Response	Paragraph
Isle of Wight Ramblers	Quiet Lanes Policy – "the council should actively engage with the community to establish a system of quiet lanes – similar to the Channel Islands with vehicle speed limited to 15 mph.	No change required - quiet lanes not considered effective in reducing traffic speeds.	No action
Resident	Noise Pollution and Noise Reducing surfaces – The council should consider the use of quieter road surfaces. The use of rubber in the mix may help to reduce noise and increase longevity. Good for locals and increase appeal as a tourist destination.	No change required. PFI will address maintenance issues.	No action
Resident	Quiet Roads – council should introduce quiet roads where "cars come second to horses and pedestrians" Used elsewhere (Norfolk?) lanes might help improve driving behaviour. Also beneficial to tourist offer.	No action required - quiet lanes not considered effective in reducing traffic speeds.	No action
Resident	Passing places – one required between Roslin Farm and Berry Hill (Chillerton).	No action required - operational issue.	No action
Resident	Country roads don't need Kerb stones and result in suburbanisation.	No action required - operational issue. Kerb stones are generally only used as part of drainage schemes.	No action
Sustainable Transpor	t / Integrated Transport		
Go South Coast Ltd	Emerging technology - There is no mention of emerging technology such as GPS location equipment, smart ticketing. Real Time information etc.	Amend text -Text in C12.6 to be amended to reflect possible and emerging technology.	C.12.6
Resident	Plan should encourage and promote car sharing.	Amend text - Reference has been made to car sharing.	C.7
Resident	As we approach "peak oil" need to encourage sustainable transport.	No change required - new text in C7 and elsewhere seeks to embrace sustainable travel options	No action
Resident	Alternatives to car use need to work – links, footpaths and timetable coordination.	No change required. Reference is already made to making the best of existing facilities and networks (A.7.1) and Rights of Way (A5).	No action
Resident	"Impression of plan is to provide improved highways infrastructure for all road users. This provides little incentive to use the bus or trains instead of the private motor car"	Amend text - New text in C.7 and elsewhere should help improve travel choice.	C.7

Organisation	Comment	Response	Paragraph
Isle of Wight Friends of the Earth	Page 2- plan highlights problems with growing traffic congestion but "no remedy is offered here – alternatives to the private car must be actively encouraged and the use of the car discouraged."	Amend text - New text in C.7 and elsewhere should help improve travel choice.	C.7
Isle of Wight Friends of the Earth	Page 18 – increasing travel choice by itself is insufficient, measures need to be taken to ensure that choice is taken up.	No action required. Plan seeks to increase travel choice and new section should explain the broader options available.	No action
Isle of Wight Friends of the Earth	Page 22 – "Recognise that for some the car is the only feasible option" – "This sentence should not be in a section on promoting public transport. This section should be about viable alternatives rather than providing excuses"	Text deleted.	Deleted from C.12.6
Sandown Town Council	STC concerned about lack of public transport in Sandown area.	Noted.	No action
Community Rail Partnership	Scant mention of public transport specifically rail.	Amend text - New text added C.7 and elsewhere.	C.7
Community Rail Partnership	A5 – plan "seeks to increase accessibility and offer real travel choice" – how will this be done?	Amend text - New text added C.7 and elsewhere.	C.7
Community Rail Partnership	A.8 - transport goals no mention of public transport or rail.	Improving public transport is implicit in "increasing accessibility".	No action
Community Rail Partnership	SEA Report – Accessibility and transport table 2.1. "The LTP3 should seek to improve public transport" Where is this in the LTP3 document.	Amend text - New text added C.7 and elsewhere.	C.7
Resident	Surprised not to see "sustainable" in the vision.	No change required. Vision is considered to be succinct and robust. Issues regarding sustainability are included elsewhere in the plan.	No action
Resident	C.8.3 – "This should be higher up your list of priorities esp. health benefits, sustainable travel to work" etc.	No change required. Noted, plan has been structured to reflect councils priorities.	No action
Resident	C.12.6 – access to west wight is limited, bus "non existent" and walking and cycling routes patchy and unsafe.	No change required. Comment noted and efforts will be made to increase accessibility to west wight where possible.	No action
CycleWight	Revenue schemes are more effective – i.e. workplace travel plans, car sharing etc.	No action required. New text highlights broader travel initiatives.	No action

Organisation	Comment	Response	Paragraph
CycleWight	Transport hierarchy should favour sustainable modes first.	No change required. Revised plan addresses sustainable modes.	No action
CycleWight	Concentration of growth in Newport will exacerbate traffic growth unless car dependency reduced.	Centralisation is largely a planning issue. Planning decisions and provision of alternatives should help address transport issues.	No action
CycleWight	A5 A reduction in choice may actually help where this encourages sustainable transport use. Important to reduce reliance on the car.	Plan seeks to increase travel choice and new text in C and elsewhere should help explain alternatives.	C.7
CycleWight	C7.3 Useful addition challenge would be "to achieve a step change in the quality and availability of all alternatives to the car and to create strong growth in their take-up along with significant modal shift".	Amend text - Text to be amended to reflect suggested text.	C.7.3
CycleWight	C11.4 Encouraging travel by sustainable transport should be first challenge – modal shift will then help deliver the rest of the challenges.	No change required. Encouraging travel by sustainable transport is included in the list of challenges.	No action
CycleWight	C12.6 Objectives should include "deliver modal shift and increase mode share of alternatives to the car".	Amend text - Text to be amended to take on board comment.	C.12.6
Havenstreet and Ashey Parish Council	"More electric points charging points required" seen a s a priority.	Amend text - New text C.11.4 and C.12.6.	C.11.4
Havenstreet and Ashey Parish Council	"Better public transport system with more options" seen as a priority.	No change required. Text already highlights options to improve public transport and increase travel choice.	No action
IOW bus and rail users group	What has been done to ensure that users make travel choices.	Amend text New public transport/travel plan/walking/cycling text included in C.7.	C.7
IOW bus and rail users group	Enlargement of three roundabouts may help car and bus users but will do nothing to encourage modal shift.	No change required. Improvements to network and PFI process will help improve travel for all road users including pedestrians, bus users and cyclists.	No action
IOW bus and rail users group	"With the demise of Wightbus it is surely very important to have a strategy for a minimum sustainable bus network".	No action required.	No action

Organisation	Comment	Response	Paragraph
South West Trains	Transport vision and goals seems to place emphasis on roads and fails to recognise the importance of public transport and the local railway.	No change required. Vision reflects councils priorities through PFI. Enhancing accessibility in vision and goals is intended to encapsulate all aspects of travel including public transport, walking and cycling.	No action
Resident	maintenance and enhancement to the detriment of hon car i	Amend text - New text in C7 and elsewhere should explain alternatives.	C.7
Resident	3	Amend text - New text in C7 and elsewhere should explain alternatives.	C.7
Tourism			
Sandown Town Council	Car free tourism is "pie in the sky".	No change required. Car free tourism is a possibility.	No action
Resident	"I don't see that closing tourist info and libraries is going to help encourage car free tourism and reduce need to travel".	No action required. Noted.	No action
CycleWight	C9 Section "contains contradictions" one part supports highway maintenance and PFI while another section promotes green tourism and tourists to leave their cars at home. Plan is "undermined by the absence of a demand management strategy".	No change required	No action
CycleWight	C11 Plan should promote "Tourism without Traffic".	Amend text - New text in C.9.4.	C.9.4
IOW bus and rail users group	"Obvious omission" is the support leisure travel for Islander residents.	No change required. National bus scheme cannot be used to support leisure services.	No action
Resident	Need to protect quality of life and retain island as a tourist destination.	Amend text - New text in C.9.4.	C.9.4
Travel Plans			
Go South Coast Ltd	Workplace Travel Plans "Draft plan is making play of WTPs yet the council has failed to address the issue and should lead by example".	New text in C7 and elsewhere should explain alternatives.	C.7
CycleWight	C11.2/4 IOW council should take a lead and promote Workplace Travel Plans.	Amend text - New text in C7 and elsewhere should explain alternatives.	C.7
Vision, Goals and Ob	ectives		
Gurnard Parish Council	"Gurnard Parish Council strongly agrees with all the criteria in relation to vision, goals and objectives, but does not rank any one of the criteria above another".		No action

Organisation	Comment	Response	Paragraph
Brading Town Council	Plan full of platitudes with goals unachievable.	Noted no action required.	No action
Brading Town Council	Little chance of Eco Island objectives being met.	Noted no action required.	No action
CycleWight	Plan seems to make highway maintenance the "major issue". It is "one part not a vision"	Noted no action required.	No action
CycleWight	New text for vision suggested.	Amend text - Amend vision text as suggested by NE	C.3
CycleWight	A8 Vision and goals – wording should be changed to included "enhance and" before "respect".	Amend text - Amend vision text as suggested by NE.	C.3
CycleWight	C3 "Business as usual" vision statement should tackle over whelming reliance on the car for commuting.	Amend text - New text in section C.7 reflecting non-car choice.	C.7
Ryde Town Council	Vision – Ryde Town Council "strongly agrees with the vision goals and objectives" but doubts that is can be delivered in this current economic climate.	Noted no action required.	No action
Hants and IOW Wildlife Trust	IOWWT welcome inclusion of the goal "respect the local; environment" and intervention 1 "ensure developments in keeping with environment" However we would wish to see this strengthened to included "ensure that the environment is protected"	Amend text - Goal has been amended in line with Natural England recommendation i.e. maintain and enhance the local environment.	C 4 and elsewhere
Natural England	Section C3 – Transport vision. NE would suggest that the word "respect" is replaced with "conserve" to "put more emphasis on management and enhancement".	Amend text - Text to be amended as suggested	C.3
Natural England	Goals – C11 NE would prefer to see this entitled "maintain and enhance the local environment" to "reflect the need for management and achieving gain through the transport strategy".	Amend text - Text to be amended as suggested.	C.11
Natural England	Goals – We generally welcome this text.	Noted no action required.	No action
Natural England	Objectives – NE generally support objective C and objective F.	Noted no action required.	No action
Walking and Cycling			
Resident	Need to encourage walking and cycling to help reduce obesity and promote physical and mental health.	Noted no action required.	No action
Resident	A5 – Still lots to do before we can call our cycle network high quality.	Noted no action required. Always room for improvement but Island recognised as one of the worlds top ten cycling routes (2010).	No action

Organisation	Comment	Response	Paragraph
CycleWight	A4 Fence to fence may also include cycleways and other features. Explicit mention would reassure existing or potential cyclists.	Amend text - Text to be amended as suggested.	A.4
CycleWight	Pleased to see support for cycling this needs to be maintained.	Noted no action required.	No action
CycleWight	C7.1/ C7.2 Junction improvements will "make car trips more attractive" and make "walking and cycling less pleasant".	No change required. Improvements to network and PFI process will help improve travel for all road users including pedestrians, bus users and cyclists.	No action
CycleWight	C12.6 bullet points should include "Enhance and extend pedestrian and cycle networks".	Amend text - Text to be amended as suggested.	C.12.6
CycleWight	C.12.6 bullet points should include "Walking and cycling should be an intrinsic part of highway improvements and new developments".	Amend text - Text amendment.	C.12.6
Havenstreet and Ashey Parish Council	"Improved cycle paths to enable safer routes for cyclists" seen as a priority.	Text already included in C.12.6.	No action
Resident	More effort should be put into supporting cycling on the Island – something that would support health and reduce congestion.	Amend text New text C.7.	C.7
Resident	A route from East Cowes into Newport along river is easily achievable and seems essential to support new housing there.	Noted no action required. Scheme has been considered with SUSTRANS, but initiative frustrated by environmental designations particularly at northern end where route would pass through SSSI.	No action
Isle of Wight Ramblers	Request new policy for pedestrians which would apply to Public Rights of Way and all walking networks.	Noted, no change required.	No action
Isle of Wight Ramblers	Rights of Way Improvement Plan – adopted but not implemented. IOW council should adopt the Ramblers Donate a Gate scheme.	Noted no change required. Adopt a gate scheme an operational as apposed to strategic issue.	No action
Isle of Wight Ramblers	C.8.2 – "there must be a real commitment to improving access to the countryside".	Noted no action required.	No action
Resident	Cyclists – more should be done to encourage cycling for both transport and health benefits	Amend text - Text in C.7 and C.12.6 to be amended as suggested elsewhere.	C.7
Environmental Consu	Iltants – Habitats Regulation Assessment and Strategic Environ	mental Assessment Recommendations	

Organisation	Comment	Response	Paragraph
UE Associates	Plan should seek to promote the development of high quality and multi functional green infrastructure networks in conjunction with emerging IOW green infrastructure strategy (Core Strategy) including non motorised routes which also deliver landscape biodiversity and climate change adaptation benefits.	Amend text - New paragraph in C.11.1.	C.11.1
UE Associates	Development of new transport infrastructure should seek to promote the hierarchy of avoidance on biodiversity, including mitigation, consideration of alternatives and finally compensation measures at a project level.	Amend text - New paragraph in C.11.1 and C.11.4.	C.11.1 and C.11.4
UE Associates	Plan should seek to promote net gains in relation to Biodiversity Action Plan targets and constitute to the enhancements afforded by the Biodiversity Opportunity Areas.	Amend text - New paragraph in C.11.1.	C.11.1
UE Associates	The value of the Islands geodiversity assets should be fully acknowledged through the LTP.	Amend text - New text at start of C.11.1.	C.11.1
UE Associates	Electric charging points should source electricity from renewable sources to support climate change.	Noted.	No action
UE Associates	Improved and enhanced highways and street lighting should seek to minimise light pollution and "night blight" on the Island.	No action required New and planned street lighting is of a design which will minimise light pollution.	No action
UE Associates	The LTP should seek to ensure that the benefits of junction improvements in Newport are "locked in" through localised measures to help restrain traffic growth - e.g. through the provision of highway space to promote the use of non-car modes of transport.	Amend text - New text has been added in C.7 and elsewhere to explain methods by which transport choice - walking, cycling and travel by public transport will be encouraged.	C.7
UE Associates	Section C.12.3 should refer explicitly to the need ensure that LTP interventions are compatible with the conservation objectives of the European sites.	Amend text - New bullet point in C.12.3.	C.12.3
UE Associates	Text should be included in the implementation plan to ensure that LTP interventions are compatible with the conservation objectives of the European sites.	Amend text - New text added C.12.3.	C.12.3
UE Associates	Para 5.4.2 of HRA screening statement recommends that supporting text in C.6 should be strengthened to refer to HRA and PFI works. 3 new sentences suggested for inclusion.	Amend text - New text included in C.6.3.	C.6.3

Organisation	Comment	Response	Paragraph
UE Associates	Para 5.4.3 of HRA recommends that Para C6 of plan should be	Amend text - New text included in C.6.3.	C.6.3
	strengthened to include two new paragraphs		0.0.5