



Strategic Environmental Assessment of the Island Transport Plan

SEA Adoption Statement

May 2011





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Contents

| | | |
|----------|--|-----------|
| 1 | Introduction | 1 |
| 1.1 | Purpose of this SEA Adoption Statement | 1 |
| 1.2 | The Island Transport Plan: Background | 1 |
| 1.3 | Content of this SEA Adoption Statement | 3 |
| 2 | How the SEA process has informed and influenced the LTP3 | 5 |
| 2.1 | The SEA process and the LTP3 | 5 |
| 2.2 | Scoping | 5 |
| 2.3 | Assessment of reasonable alternatives for the LTP3 | 5 |
| 2.4 | Development of the Consultation Draft Island Transport Plan and Environmental Report | 6 |
| 2.5 | Updates to the LTP3 following consultation | 6 |
| 2.6 | Adoption of the Island Transport Plan | 7 |
| 2.7 | Where documents linked to the LTP3 and accompanying SEA process can be found | 8 |
| 3 | How environmental considerations have been taken into account by the LTP3 | 9 |
| 3.1 | How environmental considerations have been taken into account | 9 |
| 3.2 | Recommendations to consider during the implementation of the plan | 9 |
| 4 | How consultation on the SEA has been taken into account | 11 |
| 4.1 | Consultation on the SEA | 11 |
| 4.2 | Consultation on the Scoping Report | 11 |
| 4.3 | Consultation on the Draft LTP3 and accompanying Environmental Report | 12 |
| 5 | Monitoring | 13 |
| 5.1 | Monitoring | 13 |
| 5.2 | Links with the LTP3 Annual Progress Report | 14 |
| | References | 15 |

Appendix A: Scoping Report responses and how they have been addressed.

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1 Introduction

1.1 Purpose of this SEA Adoption Statement

This SEA Adoption Statement has been prepared for Isle of Wight Council as part of the strategic environmental assessment (SEA) of the Island Transport Plan (referred to throughout this document as the LTP3). It represents the final stage of the SEA process for the LTP3.

The SEA Adoption Statement has been produced in compliance with the Environmental Assessment of Plans and Programmes Regulations 2004 SI No. 1633. The statement incorporates the requirement to produce an Adoption Statement as required by the SEA Directive 2001/42/EC.

This SEA Adoption Statement accompanies the adopted LTP3, which can be accessed at: http://www.iwight.com/living_here/environment/transport_strategies/LTP3/.

1.2 The Island Transport Plan: Background

Isle of Wight Council (IoWC), as the local transport authority for the Isle of Wight, has prepared the third Local Transport Plan (LTP3) for the Island, the Island Transport Plan. This replaces the Island's second Local Transport Plan (LTP2), which was adopted in April 2006, and covers the five year period between 2006-11.

The LTP3:

- ▶ Sets out the Island's transport policies and their relation with national, regional and local policy objectives;
- ▶ Identifies local transport issues, challenges and opportunities;
- ▶ Outlines the background to the Island's highway maintenance Private Finance Initiative (PFI)¹;
- ▶ Provides guidance on transport issues for the emerging Island Plan Local Development Framework; and
- ▶ Leaves open the opportunity of an early 'refresh' should funding allocations and opportunities change significantly from expected levels.

The lifespan of the LTP3 will be from 2011 to 2038. This time period aligns with that of the Highways Maintenance Private Finance Initiative (PFI) for the Island, which is due to begin in April 2013, and covers a period of 25 years. The longer timeframe will also enable IoWC to set, and help deliver, longer term strategic priorities.

¹ The Department for Transport has approved PFI Credits for the Isle of Wight Council to rehabilitate the Island's roads, footways, street lighting and most other aspects that are related to the highway network. The PFI will begin in April 2013 and cover a 25 year period to 2038.

The key facts related to the LTP3 are presented in **Table 1.1**.

Table 1.1: Key facts relating to the Island Transport Plan

| | |
|--|--|
| Name of Responsible Authority | Isle of Wight Council |
| Title of plan | The Island Transport Plan (LTP3) |
| What prompted the plan (e.g. legislative, regulatory or administrative provision) | <p>The LTP3 is the third Local Transport Plan to be developed for the Isle of Wight. It follows the LTP1, which covered the period 2001-06, and the LTP2, which covered the period from 2006-11.</p> <p>The LTP3 has been developed following the implementation of the Local Transport Act 2008. The Act retains the statutory requirement to produce and review Local Transport Plans and policies, and requires local transport authorities to produce an LTP3 by April 2011.</p> |
| Subject (e.g. transport) | Transport Plan. |
| Period covered by the plan | 2011 to 2038. An Implementation Plan will cover the period between 2011 and 2013. |
| Frequency of updates | When required. |
| Area covered by the plan | The area covered by the local transport authority of Isle of Wight Council. |
| Purpose and/or objectives of the plan | <p>The LTP3:</p> <ul style="list-style-type: none"> • Sets out the Island’s transport policies and their relation with national, regional and local policy objectives; • Identifies local transport issues, challenges and opportunities; • Outlines the background to the Island’s highway maintenance Private Finance Initiative (PFI); • Provides guidance on transport issues for the emerging Island Plan Local Development Framework; and • Leaves open the opportunity of an early ‘refresh’ should funding allocations and opportunities change significantly from expected levels. <p>The LTP3 has been presented through a long term strategy and an implementation plan.</p> |
| Plan contact point | <p>Mr. Chris Wells, Transport Policy Manager, Highways and Transport Service, Isle of Wight Council</p> <p>Telephone number: 01983 821000</p> <p>Email: chris.wella@iow.gov.uk</p> |

1.3 Content of this SEA Adoption Statement

SEA Regulations 16.3c)(iii) and 16.4 require that a 'statement' be made available to accompany the plan, as soon as possible after the adoption of the plan or programme.

The SEA Regulations highlight that the statement should contain the following information:

- ▶ The reasons for choosing the preferred strategy and implementation plan for the LTP3 as adopted in the light of other reasonable alternatives dealt with;
- ▶ How environmental considerations have been integrated into the LTP3;
- ▶ How consultation responses have been taken into account; and
- ▶ Measures that are to be taken to monitor the significant environmental effects of the LTP3.

In this context, the purpose of the SEA Adoption Statement is to outline how the SEA process has informed and influenced the LTP3's development process and demonstrate how consultation on the SEA has been taken into account.

Chapter 2 of this SEA Adoption Statement summarises how the SEA has informed and influenced the LTP3, including in light of the other alternatives dealt with. **Chapter 3** highlights how environmental considerations have been integrated into the LTP3. **Chapter 4** discusses how consultation has been carried out and taken into account by the SEA. The final chapter, **Chapter 5** sets out the proposed monitoring regime for the SEA, which it is proposed will be carried out alongside monitoring for the LTP3.

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2 How the SEA process has informed and influenced the LTP3

2.1 The SEA process and the LTP3

The main aim of SEA is to inform and influence the plan making process to maximise the LTP3's environmental sustainability value. In this context the SEA process has fed into the LTP3 through providing information at each stage of its development process.

Table 2.1 highlights the main outputs of the SEA process in conjunction with those of the development of the LTP3. A more detailed description of how the respective stages of the LTP3 and SEA have interlinked is presented in **Sections 2.2 to Section 2.6**.

2.2 Scoping

The Scoping Report for the LTP3 was published for consultation for a period of five weeks between 28th April 2010 and 2nd June 2010. Its purpose was to establish the scope of and methodology for the SEA, to provide the basis for consultation related to the range and level of detail of reporting for the SEA, and the evidence base on which it is established. Responses were received from three organisations. Following the receipt of responses, the SEA information, including the SEA's evidence base, policy and plan review, and SEA Framework of objectives and indicators against which the LTP3 would be assessed was updated and the information was included in subsequent SEA Reports.

Scoping for the SEA process complemented initial evidence gathering for the LTP3.

2.3 Assessment of reasonable alternatives for the LTP3

The SEA Directive requires that the Environmental Report should consider:

'Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme' and give 'an outline of the reasons for selecting the alternatives dealt with' (Article 5.1 and Annex I (h)).

To address this requirement, 44 prospective LTP3 interventions and measures, grouped under a series of LTP3 objectives were assessed as part of the SEA process. These comprised different alternative interventions and measures which potentially could be taken forward as part of the LTP3.

The assessment of the potential interventions and measures engaged a 'high-level' assessment technique which utilised the SEA Framework, the baseline and the review of plans, programmes and policies to assess each alternative set of initiatives. This was presented through a series of assessment matrices and an accompanying commentary which compared

the sustainability performance of each of the sets of measures. To supplement the appraisal and the commentary, the SEA Alternatives Report also presented a set of recommendations which it suggested should be taken forward through the ongoing development of the draft LTP3.

Whilst not being a requisite part of the SEA Regulations or DfT SEA Guidance (TAG Unit 2.11, April 2009) the preparation of the SEA Alternatives Report followed the 'spirit' of SEA through seeking to inform and influence the development of the LTP3 at an early stage to help maximise the plan's environmental value. The results of the assessment of the alternative interventions and measures helped the LTP3 development team identify a "preferred option" approach for the LTP3.

2.4 Development of the Consultation Draft Island Transport Plan and Environmental Report

Following the assessment of reasonable alternatives, the Consultation Draft of the LTP3 was developed, comprising a draft Strategy and Implementation Plan for the plan. Presenting a vision, a set of goals and a package of proposed transport interventions for the Island, the Draft LTP3 was released for consultation for a period of twelve weeks from November 2010 to February 2011.

To accompany the Draft LTP3, an Environmental Report was prepared in conjunction with the requirements of the SEA Directive. This set out the stages of the SEA process that had been carried out to date, and presented an assessment of the proposed package of interventions and measures against the SEA Framework of objectives and indicators. It also discussed how the SEA process had informed and influenced the development of early versions of the measures and interventions included in the consultation document.

2.5 Updates to the LTP3 following consultation

In early 2011, a number of changes were made to the Draft LTP3 previously released for consultation in November 2010. These updates were made in order to:

- ▶ Reflect changes and developments in Government policy;
- ▶ Reflect changes to funding, including to the Department for Transport local transport capital block settlement; and
- ▶ Respond to specific comments by stakeholders raised in formal responses, at briefings and at LTP3 events.

Incorporated within these updates, a number of changes were made to interventions and measures put forward by the LTP3 and the background text supporting existing proposals. The following text discusses these changes in relation to the findings of the SEA process. As highlighted by the summary below, no additional significant adverse effects are likely to arise as result of these updates, and due to the updates leading to likely beneficial environmental effects, the SEA endorses the revisions made to the Draft LTP3.

2.5.1 PFI text

The post consultation version of the LTP3 includes further information as to how the PFI element of the plan will seek to address potential effects on the integrity of internationally designated nature conservation sites present on and adjacent to the Island. The inclusion of this additional text was in response to concerns raised through the Habitats Regulations Assessment process carried out on the LTP3.

The SEA process supports this update, as it clarifies in more detail how potential risks linked to the implementation of activities related to the PFI should be addressed and managed.

2.5.2 Travel choice

Following consultation, the updated post consultation LTP3 includes further detail on how travel choice on the Island will be promoted through improved bus, train, walking, cycling and taxi provision. It also presents further detail on Workplace and School Travel Plans and green travel for tourism. Whilst the additional information included in the LTP3 does not include significant new interventions for the LTP3, the provision of further detail and additional impetus on sustainable transport modes is fully supported by the SEA process.

2.5.3 Light pollution

The updated LTP3 includes additional information as to how transport infrastructure's contribution to light pollution will be addressed through the LTP3. This reflects the recommendations of the SEA Environmental Report (**Section 2.4**), which suggested that improved and enhanced highways and street lighting should seek to minimise light pollution and "night blight" on the Island.

2.5.4 Green infrastructure and biodiversity networks

The post consultation LTP3 includes new text reiterating the LTP3's support for the development of high quality and multifunctional green infrastructure networks in conjunction with the Island's Green Infrastructure Strategy. Reflecting the recommendations presented in **Section 7.1** of the **Environmental Report**, this is fully supported by the SEA process.

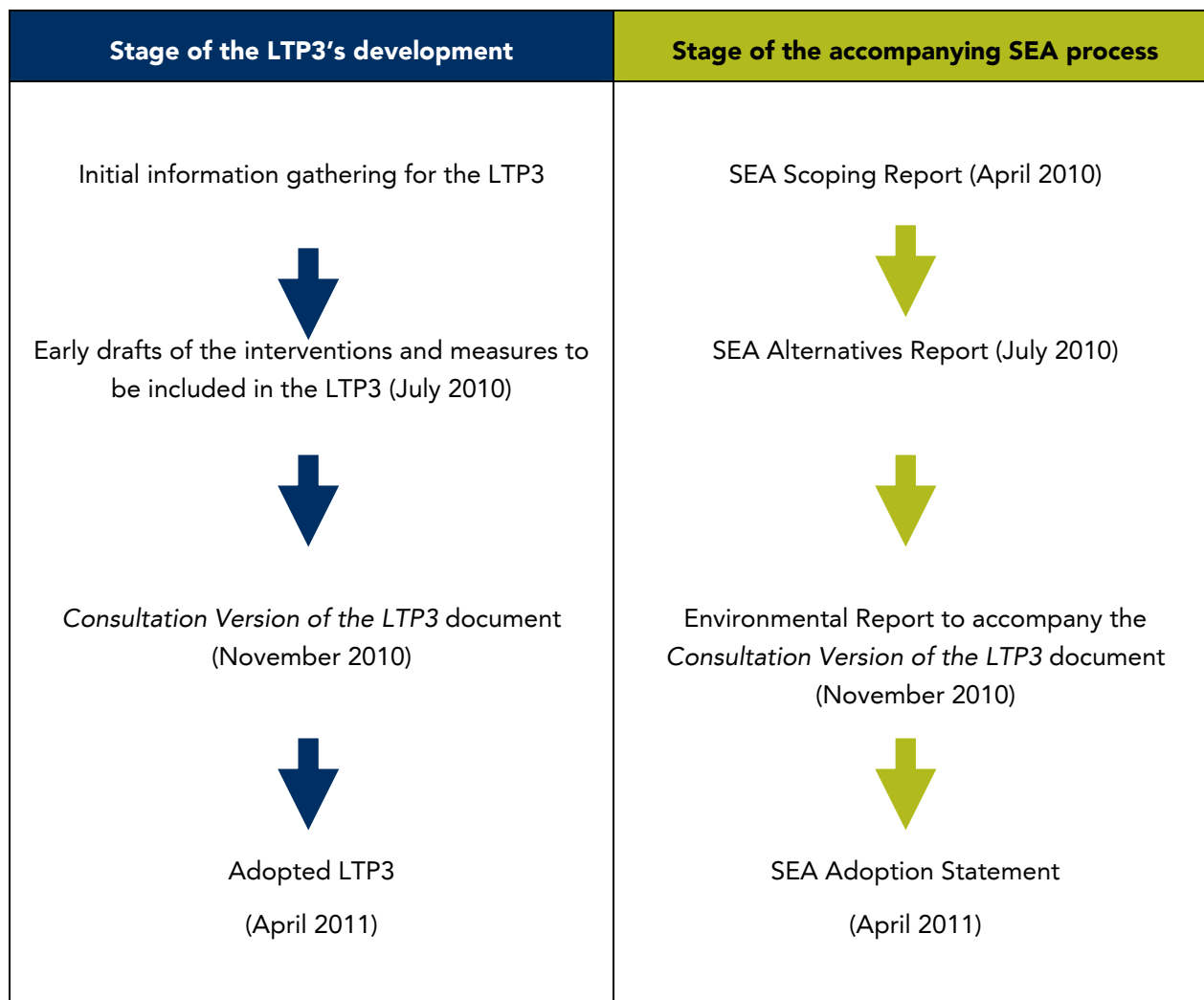
The updated LTP3 includes additional text which seeks to promote net gains in relation the local Biodiversity Action Plan targets, and to contribute to the enhancements afforded by the Biodiversity Opportunity Areas present on the Island. It also highlights that new transport infrastructure should seek to promote the hierarchy of avoidance on biodiversity assets on the Island. The inclusion of this text also reflects the recommendations included in **Section 7.1** of the **Environmental Report** and as such is supported by the SEA process.

2.6 Adoption of the Island Transport Plan

Isle of Wight Council are presently preparing to adopt the LTP3, including the Strategy and the Implementation Plan, in April 2011.

This SEA Adoption Statement accompanies the adopted version of the LTP3.

Table 2.1: Stages of the development of the LTP3 and accompanying SEA process



2.7 Where documents linked to the LTP3 and accompanying SEA process can be found

All documents and background information associated with the LTP3, including those linked to the SEA process, can be accessed on Isle of Wight Council's website at:

http://www.iwight.com/living_here/environment/transport_strategies/LTP3/.

3 How environmental considerations have been taken into account by the LTP3

3.1 How environmental considerations have been taken into account

As discussed in **Chapter 2**, the SEA process has informed and influenced the LTP3 throughout its development process. The SEA process therefore highlighted at different stages the environmental issues which had the potential to arise as a result of the implementation of earlier and later versions of the LTP3 interventions and measures.

The adopted LTP3 has addressed many of these potential environmental issues through taking into account of the findings of the SEA process. In this context most minor impacts relating to specific or groups of interventions and measures have been addressed by other components of the LTP3. Where this has taken place, this has been noted in the analysis undertaken during the SEA.

Besides the various SEA Reports that were prepared as part of the SEA process, the SEA team provided regular feedback to the LTP3 team. This served to keep abreast of proposals and provide direct input to the plan making process.

3.2 Recommendations to consider during the implementation of the plan

Whilst most environmental issues have been addressed through the relevant interventions and measures in the LTP3, a number of potential residual environmental effects are likely to remain through taking forward the LTP3. In this context the SEA process has suggested a number of recommendations for consideration during the ongoing implementation of the plan. These include as follows:

- ▶ The LTP3 should seek to ensure that the benefits of junction improvements in Newport are 'locked in' through relevant 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);
- ▶ The value of the Island's geodiversity assets should be fully acknowledged through the delivery of new transport infrastructure on the Island; and
- ▶ Electric charging points should source electricity from renewable sources to support climate change mitigation.

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4 How consultation on the SEA has been taken into account

4.1 Consultation on the SEA

The SEA Directive requires responses to consultation to be taken into account during the preparation of the plan or programme and before its adoption or submission to a legislative procedure.

Consultation has been an integral part of the SEA of the LTP3. In addition to enabling the opinions of the statutory environmental bodies and other stakeholders to be taken into account, it has provided an opportunity for the public to be informed as to how decisions are made.

4.2 Consultation on the Scoping Report

The SEA Scoping Report for the LTP3 was published for consultation for a period of five weeks between 28th April 2011 and 2nd June 2010. It was released to the three statutory SEA consultation bodies: English Heritage, the Environment Agency and Natural England and a range of other stakeholders.

The purpose of the Scoping Report was to establish the scope of and methodology for the SEA, to provide the basis for consultation related to the range and level of detail of the SEA process, and the evidence base on which it is established. Responses were received from three organisations. Following the receipt of responses, the SEA information, including the baseline and policy and plan review, was updated. This information was included in subsequent SEA reports.

Consultee responses on the Scoping Report were received from the following organisations:

- ▶ Environment Agency;
- ▶ Natural England;
- ▶ RSPB.

Appendix A summarises the comments raised during the scoping consultation and details how they were taken into account through the subsequent SEA process for the LTP3.

4.3 Consultation on the Draft LTP3 and accompanying Environmental Report

The second main stage of consultation during the SEA process was the extensive consultation exercise carried out on the Draft LTP3 and the accompanying Environmental Report. This was undertaken for a period of twelve weeks between November 2010 and February 2011.

Consultation responses received on the Environmental Report were taken into account and addressed through the ongoing development of the SEA process. Likewise, consultation responses received on the main LTP3 document and the Habitats Regulations Assessment process were considered by the SEA.

As highlighted by **Chapter 2**, in addition to the Environmental Report, a range of further SEA inputs were provided to the LTP3 team throughout its development process. These included appraisals of initial and early versions of reasonable alternatives for the LTP3 and consideration of the updates to the strategy element of the LTP3 following consultation. Although these were not subject to further consultation, they provided an ongoing and iterative contribution to the development of the LTP3.

5 Monitoring

5.1 Monitoring

The SEA Directive states that 'member states shall monitor the significant environmental effects of the implementation of plans and programmes.....in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action' (Article 10.1). In addition, the Environmental Report should provide information on a 'description of the measures envisaged concerning monitoring' (Annex I (i)).

The monitoring requirements typically associated with the SEA process are recognised as placing heavy demands on authorities with SEA responsibilities. For this reason, the proposed monitoring framework should focus on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.

Table 5.1 outlines proposals for a monitoring programme for measuring the LTP3's implementation in relation to the areas where the SEA has identified potential significant effects, and where significant opportunities for an improvement in environmental performance may arise. It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the LTP3 are achieved throughout its implementation.

Monitoring is particularly useful in answering the following questions:

- ▶ Were the assessment's predictions of environmental effects accurate?
- ▶ Is the LTP3 contributing to the achievement of desired environmental objectives?
- ▶ Are mitigation measures performing as well as expected?
- ▶ Are there any unforeseen adverse effects? Are these within acceptable limits, or is remedial action required?

The purpose of monitoring is to measure the environmental effects of a plan, as well as to measure success against the plan's objectives. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many of the indicators of progress chosen for the SEA require data that is already being routinely collected at a local levels by loWC and its partner organisations. It should also be noted that monitoring can provide useful information for future plans and programmes.

Table 5.1: Proposed monitoring programme for the LTP3

| Potential adverse effect, or area to be monitored | Indicator | Data Source | Frequency of monitoring and scale | Target/ Trigger |
|--|--|-------------------|-----------------------------------|---|
| Potential stimulation of car use by junction improvements and enhanced network management. | Traffic flows on key routes | IoWC and partners | Annually, key routes | When flows increase year on year |
| Effect of junction improvements and enhanced network management on air quality. | No. of days when air pollution is moderate or high for NO ₂ | IoWC and partners | Annually, Island wide | When number of days exceeds year on year |
| The effect of the LTP3 on greenhouse gas emissions from transport | Carbon footprint of the Island | IoWC | Annually, Island wide | When transport sector emissions increase year on year |
| Link between public charging points for electric vehicles and climate change mitigation | Proportion of public charging points for electric vehicles sourcing electricity from renewable sources | IoWC and partners | Annually, Island wide | When proportion reduces year on year |

5.2 Links with the LTP3 monitoring

The SEA guidance suggests that SEA monitoring and reporting activities can be integrated into the regular planning cycle. A Island-wide monitoring programme has been set up by IoWC to measure the national indicators including several transport targets. This process will continue to form the primary mechanism for monitoring of the LTP3. At scheme delivery level, SEA monitoring takes place at the business case stage for schemes, where potential impacts are actively considered and suitable mitigation measures are identified. It is anticipated that elements of the SEA monitoring programme for the LTP3 will be incorporated into this process.

The monitoring programme is, at this stage, preliminary and may evolve over time based on the identification of additional data sources (as in some cases information will be provided by outside bodies). The monitoring of individual schemes and proposals should also be addressed at project level.

References

Department for Transport (April 2009), TAG Unit 2.11, Strategic Environmental Assessment for Transport Plans and Programmes ('In draft' Guidance)

Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

The Environmental Assessment of Plans and Programmes Regulations 2004, Statutory Instruments 2004 No. 1633

UE Associates (April 2010), Isle of Wight LTP3 SEA Scoping Report

Alliance Planning and UE Associates (July 2010), SEA Alternatives Report

UE Associates (November 2010), Isle of Wight LTP3 Environmental Report

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Appendix A: SEA Scoping Responses

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Analysis of consultation responses received on the Isle of Wight LTP3 SEA Scoping Report (April to June 2010)

| Organisation & contact: Environment Agency (Laura Bourke, Planning Liaison Officer, Solent & South Downs) | | | | |
|---|------------------|--------------------|--|---|
| Date received: 7th May 2010 | | | | |
| Comment number | Page of response | Scoping Report ref | Comment | Action for SA |
| 1 | 1 | General comment | I am unable to provide detailed comments on the above, attached is a fact sheet for your information which I hope you find useful. | The Environment Agency will not be responding to the Isle of Wight LTP3 Scoping Report consultation. This was confirmed by subsequent communication with Jon Maskell on 7th May 2010. The Factsheet provides useful information to support the assessment of the LTP3. |

| Organisation & contact: Natural England (George Gittings, Environmental Planning Advisor, Government Team, South East Region) | | | | |
|---|------------------|--|---|--|
| Date received: 1st June 2010 | | | | |
| Comment number | Page of response | Scoping Report ref | Comment | Action for SA |
| 1 | 1 | General comment | As you may already be aware, Natural England's general position on Local Transport Plans (LTPs) is contained in the appended guidance, 'Natural England Guidance on Local Transport Plans and the Natural Environment'. This refers to the positive outcomes we are seeking on biodiversity, landscape, geodiversity and soils, climate change and energy and quality of life. The guidance sets out Natural England's 5 key priorities for LTPs and how these should be addressed under the 5 national transport goals. It also includes hyperlinks, in the footnotes, to a range of resources on issues such as the integration of Rights of Way Improvement Plans (ROWIPs) with LTPs, and guidance on Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment. | The guidelines have been considered through the assessment process. The guidance document has also been provided to the LTP3 development team. |
| 2 | 1 | SEA methodology and approach | Natural England welcomes the approach to SEA set out in section 2 of the Scoping Report, including reference to best practice guidance. The thorough approach in presenting the environmental information themes set in sections 3-14 and the identification of key issues for each theme is also welcomed. | Comment noted |
| 3 | 1 | Chapter 5: Air quality | Section 5 Air quality – The report appears to focus on air quality issues in terms of human health and should also refer to the potential impacts on biodiversity, which may be different and sometimes have higher standards in terms of critical level / load than those relevant to human health, as set out in the UK Air Pollution Information System (APIS). | The key issues have been updated to reflect air quality issues for biodiversity. |
| 4 | 1 | Chapter 6: Biodiversity & Geodiversity | The report has correctly identified the Island's important biodiversity assets in terms of habitats, species and range of designated sites. | Comment noted. |
| 5 | 1 | Chapter 6: Biodiversity & Geodiversity | In terms of all existing sites of biodiversity importance, Natural England considers the SEA should promote the hierarchy of avoidance of impacts, necessary mitigation, consideration of alternatives and finally compensatory measures. | The hierarchy of avoidance of impacts has been promoted through the appraisal process and the recommendations set out in the Environmental Report. |

| Comment number | Page of response | Scoping Report ref | Comment | Action for SA |
|----------------|------------------|--|---|---|
| 6 | 1 | Chapter 6: Biodiversity & Geodiversity | There should also be a positive commitment to site enhancement through the LTP, including delivery of net gains to Biodiversity Action Plan targets and contributing to the network of Biodiversity Opportunity Areas. | Comments fed back to the LTP3 development team. Site enhancement in this context has been promoted through the recommendation set out in the Environmental Report. |
| 7 | 1 | Chapter 6: Biodiversity & Geodiversity | In Box 3, Key issues, biodiversity and geodiversity, erosion is referred to as a threat to coastal habitats. However it should also be noted that for some designated sites, erosion is part of the natural processes which have an important role in creating or maintaining features of interest. | Comment noted. Natural processes aspect of erosion has been acknowledged in updated key issues and baseline. |
| 8 | 2 | Chapter 8: Health | Section 8 Health – The references to promoting sustainable and healthier forms of travel is welcomed. Reference should also be added the increased mental wellbeing that people derive from access to the natural environment. Natural England strongly promotes the provision of multi-functional green infrastructure (GI), which will increase the connectivity of areas in which people travel and provide attractive routes for walking, cycling and recreation. GI is a cross-cutting issue relevant to a range of environmental themes. Please see further details in the South East Green Infrastructure Framework http://www.naturalengland.org.uk/regions/south_east/ourwork/greeninfrastructureframework.aspx) | Green infrastructure provision is a decision making criteria for the landscape SEA Objective (SEA Objective 2) and the health and wellbeing SEA Objective (SA Objective 11). |
| 9 | 2 | Chapter 8: Health | We would also wish to see specific reference in the report to integrating LTPs with Rights of Way Improvement Plans (ROWIPs), as set out in the attached guidance. | This aspect has been considered through the appraisal process. |
| 10 | 2 | Chapter 10: Health | Section 10 Landscape – Natural England welcomes the emphasis on the protection of landscape, in particular the designated landscapes of the AONB and Heritage Coast. We would strongly advocate the use of Landscape Character Assessment to underpin all decisions affecting landscape across the whole Island, using methodologies consistent with those set out in Landscape Character Assessment: Guidance for England and Scotland Countryside Agency and Scottish Natural Heritage, 2002. This provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating local character and distinctiveness, as detailed proposals are developed. | Comments fed back to the LTP3 development team. The principles of the Guidance has been reflected buy the recommendations of the SEA. |
| 11 | 2 | Chapter 10: Landscape | We would also support the methodology set out in the publication Guidelines for Landscape and Visual Impact Assessment, produced by the landscape Institute and the Institute of Environmental Management and Assessment in 2003 (2nd edition). This guidance is accepted good practice, and provides a transparent and robust process for informing decisions on impact assessment and significance. Natural England therefore advises that the SEA should include a commitment to a full assessment of the potential impacts of proposed LTP schemes using these methodologies. This should include the detailed design of highway infrastructure such as measures to avoid / reduce light pollution and noise levels, contributions to green infrastructure and use of traditional materials and designs in any built features. | The use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment has been included in the recommendations for the implementation of the LTP3. The project level Environmental Assessments will also consider these issues. Many of the proposed schemes are not progressed to the extent which these project level considerations can be considered. |
| 12 | 2 | Chapter 13: Soil | The report correctly identifies that, as highlighted by the Soil Strategy for England, soil is a vital natural resource, with a range of key functions. Natural England would wish to see a commitment to manage all soils sustainably where soil movement is involved in road schemes, also in accordance with published guidance including the Highways Agency 'Design Manual for Roads and Bridges' and the Defra 'Code of Good Practice for the Sustainable use and management of soil on construction sites'. PPS7 Sustainable Development in Rural Areas requires that local planning authorities should 'take (best and most versatile land) into account along with other sustainability considerations when determining planning applications .. where significant development of agricultural land is unavoidable, local planning authorities should seek to use poorer quality land (grades 3b, 5 and 5) in preference to that of higher quality, except where this would be inconsistent with other sustainability considerations'. These considerations should therefore be taken into account where alternative new road schemes are being appraised. | Comments have been taken into account through the appraisal process. The best and most versatile agricultural land has been considered by the appraisal. |

| Comment number | Page of response | Scoping Report ref | Comment | Action for SA |
|----------------|------------------|---------------------------|---|---|
| 13 | 2 | Appendix B: SEA Framework | Natural England supports the SEA objectives and outline methodology referred to sections 15 and 16 of the consultation report and the SEA framework in appendix B. With regard to targets and indicators, I would suggest additions on air quality relating to designated sites of nature conservation importance. | An additional decision making criteria relating to effects on nature conservation sites from air quality has been included under SA Objective 3 (biodiversity). |
| 14 | 2 | Appendix B: SEA Framework | For population, accessibility and transport, I would suggest that an additional indicator would be contributions to ROWIPs in terms of additional length of cycle routes / footpaths / bridleways access routes and improved connectivity of the cycleway / footpath network. | An additional indicator has been included for SA Objective 10 to reflect additional length of cycle routes / footpaths / bridleways and access routes. |
| 15 | 2 | Appendix D: PPP review | Natural England agrees with the schedule of relevant policies, plans and programmes identified in appendix D | Comment noted. |
| 16 | 3 | General comment | Natural England would welcome early dialogue where you consider that infrastructure proposals are likely to have significant impact on natural assets such as landscape, habitats / biodiversity, and air / water quality; or implications in terms of Green Infrastructure, Rights of Way and access to local natural green space and the wider countryside. | Comment noted and fed back to LTP3 development team. |

Organisation & contact: RSPB (Irene Curran, Conservation Officer)

Date received: 28th May 2010

| Comment number | Page of response | Scoping Report ref | Comment | Action for SA |
|----------------|------------------|--------------------|--|---|
| 1 | 1 | General comment | Thank you for consulting the RSPB on the Isle of Wight LTP3 Strategic Environmental Assessment Scoping Report. We have reviewed the document and consider that it provides a robust record of the existing environmental, social and economic conditions on the Isle of Wight. | Comment noted. |
| 1 | 1 | Key issues | We consider that the key issues that have been identified adequately reflect the challenges facing the Island. In particular, we welcome the inclusion of "recreational pressures on wildlife sites" as a key issue in Box 3. | Comment noted. |
| 1 | 1 | SEA Framework | We also welcome the SEA objectives that have been established and consider that they will provide a sound framework for appraising the sustainability of the Isle of Wight LTP3. | |
| 1 | 1 | General comment | We would greatly welcome the opportunity to comment on the Isle of Wight Local Transport Plan 3 and its supporting documents, including the Strategic Environmental Assessment and Habitats Regulations Assessment when you publish them for consultation. | Comment noted and fed back to LTP3 development team. The RSPB will continue to be consulted through the LTP3's development process. |

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