

Isle of Wight Local Transport Plan 2 Strategic Environmental Assessment Statement (in accordance with Article 9(1) of the SEA Directive)

Isle of Wight Council

March 2006



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1 Introduction

1.1 BACKGROUND

- 1.1.1 A Strategic Environmental Assessment (SEA) has been undertaken as part of the development of the Isle of Wight Local Transport Plan 2 (LTP 2).
- 1.1.2 SEA considers the potential impacts of a plan on the environment. It does this by assessing the extent to which the plan will help achieve a set of objectives¹ that cover a range of issues, including air quality, landscape, water, health and the population. The SEA also has to satisfy the requirements of the EC Directive on the assessment of the effects of certain plans and programmes on the environment (Directive 2001/42/EC) (known as the SEA Directive).
- 1.1.3 The SEA was undertaken by external consultants WSP Environmental Ltd, with additional technical advice provided by ENVIRON UK Ltd.
- 1.1.4 The LTP 2 establishes local transport policy for the period between 2006/07 and 2010/11. A provisional LTP 2 was submitted to the Government in July 2005 and the adopted plan was submitted in March 2006. This plan will address the shared priorities for transport outlined in the Department for Transport (DfT) Guidance and its objectives are as follows:
- Increase accessibility for all;
- Make roads safer;
- Improve local air quality; and
- Tackle congestion.
- 1.1.5 The Isle of Wight Council have also included 4 additional objectives which are considered of local importance:
- Encourage and support economic regeneration and prosperity
- Improve the local environment;
- Ensure effective management of the highway network; and
- Achieve value for money solutions.
- 1.1.6 The SEA Statement acts as an important check on the LTP, and on the SEA process. It helps to ensure that the environment has been considered at every stage, and that the information collated has influenced the final shape of the LTP. The SEA Statement requires the decision maker to justify the choices made in the adopted LTP.
- 1.1.7 This document has been structured around the requirements of the SEA Directive which asks for the following:
- How environmental considerations have been integrated into the Plan (Section 2);
- How consultation responses have been taken into account (Section 3);
- The reasons for choosing the LTP as adopted, in light of reasonable alternatives (Section 4); and
- Proposals for monitoring (Section 5).

¹ Please note that in order to achieve consistency with the Isle of Wight Core Strategy Sustainability Appraisal the objectives within the SEA Framework are referred to as 'criteria' and sub-objectives as 'sub-criteria'.

1.2 DOCUMENTS PRODUCED

1.2.1 A number of documents have been produced as a part of the SEA and the development of the LTP 2. Table 1 below describes the purpose of each document and where these can be accessed.

Table 1: Documents produced as part of the SEA and the LTP 2 processes

Document	Purpose	How to access the documents
The SEA Scoping Report	The Scoping Report set out the background information collated in stage A of the SEA process (see flow chart over page), which has subsequently been used in the later stages of the assessment.	The document can be access at the following web address: http://www.iwight.com/transport
The Provisional LTP 2 and Environmental Report	The Provisional LTP 2 is the first draft of the Plan which is widely consulted upon. Includes an appendix setting out the proposed approach to the SEA. The Environmental Report (ER) documents the findings of Stages A, B and C of the SEA process demonstrating how the detailed environmental considerations are informing the Plan making process.	The documents can be access at the following web address: http://www.iwight.com/transport
The adopted LTP 2 and SEA Statement	The adopted LTP 2 is the final version of the Plan which has been amended in light of consultation on the provisional plan. The SEA statement describes how the environment, the Environmental Report and consultation have been taken into account in the development of the LTP 2. It describes why this version of the plan has been chosen and also sets out detailed proposals for monitoring the environmental effects of the plan.	The documents can be access at the following web address: http://www.iwight.com/transport

In addition, copies of the above reports can also be obtained from:

Mrs C Westwood

Isle of Wight Council

Enterprise House

St Cross Business Park

Monks Brook

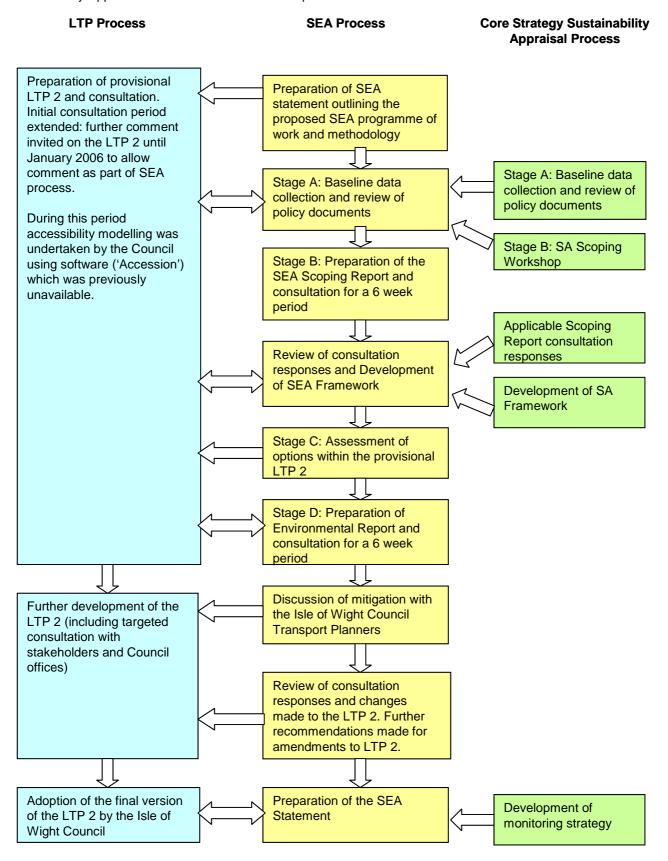
Newport

Isle of Wight

PO30 5WB

1.3 THE SEA PROCESS

1.3.1 The flow chart below provides an overview of the SEA process and demonstrates how it has been integrated into the process to develop the LTP 2. The flow chart also shows how elements of the *Island Plan* Core Strategy Sustainability Appraisal have been fed into the SEA process.



2 How environmental considerations have been integrated into the LTP 2

2.1.1 THE ASSESSMENTS

- 2.1.2 The SEA undertook two types of analysis of the provisional LTP 2. These are a compatibility analysis between provisional LTP2, "vision and objectives" and the SEA criteria, plus an assessment of the potential environmental effects of bids and measures contained in the provisional plan. Assessment worksheets and matrices were used to assess the environmental implications of individual schemes listed in the implementation programme of the provisional plan (see the Appendices of the Environmental Report (ER)).
- 2.1.3 Assessments were undertaken on the variety of measures and schemes proposed within the provisional plan. The proposed measures and schemes were seen as options for achieving the five year strategy objectives. These assessments identified potential negative effects with respect to soil and geology, water, biodiversity, fauna and flora, archaeology and cultural heritage and noise and vibration. However, in line with the provisional LTP 2 Five Year Strategy, most of the schemes have the potential to increase travel choice and provide greater opportunities for walking and cycling, limit traffic growth, reduce car trips, reduce emissions of greenhouse gases and improve air quality. Similarly, most of the schemes are also likely to improve access to public transport, services and facilities. Several of the schemes proposed should also improve the condition of the Island's transport infrastructure, some of which include resurfacing, which should also improve safety. Several of the schemes also present the opportunity of enhancing built heritage, such as through reducing traffic congestion in Newport, and rerouting HGV traffic away from town centres.
- 2.1.4 Mitigation was proposed in the ER following the assessment of the provisional LTP 2 to reduce environmental impacts and enhance proposals where possible.

2.2 HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

- 2.2.1 The mitigation summarised in Section 9 of the ER has been applied to the adopted LTP 2 and will also be applied to later stages of schemes e.g. when footpaths for extension are identified and scheme designs are developed. The mitigation is summarised in Table B1 in Appendix B. This table also includes the response from the Council to the mitigation.
- 2.2.2 In summary, the LTP 2 has taken account of the ER in the following ways:
- The adopted LTP 2 more fully reflects the environment of the Island and the ways in which transport can impact on the environment. This is reflected throughout the Plan but notably in Section E, the Five Year Strategy which now includes an expanded discussion of environmental issues
- The Council has extended its consultation protocol to formally consult with internal and external partners, including officers from the AONB partnership, Ecology Officer, Planning, Archaeology, Parks and Beaches, Conservation Officers, English Nature and Environment Agency regarding transport proposals (see Chapter K Ensuring Effective Management for full details);
- As a result of the compatibility analyses with the SEA Criteria, additional text has been added to the discussion around the Long term Vision;
- A paragraph on the potential environmental impacts of air travel has been added to the LTP 2 (see Section, paragraph 12.5);
- As a result of issues raised in the assessments with respect to instability, geomorphology, coastal erosion and climate change and in response to consultation comments received, the Council is in the process of commissioning a study examining the longer-term implications of coastal erosion in relation to the Island's highway infrastructure; and
- In addition to the above, the Council has also entered into consultation with various parties including English Nature and Environment Agency in relation to implications of coastal erosion and the transport network.

Changes to the LTP 2 Since the First Assessments

- 2.2.3 The content of one section of the adopted LTP 2 changed from the provisional LTP 2. This was the Implementation section which listed the schemes to be implemented as a part of the Five Year Strategy and also provided costs for each scheme. This section has been amended to take account of a reduction in Government funding in respect of Integrated Transport Schemes, including public transport, walking, cycling and safety initiatives. As a result, a reduced number of schemes have been included.
- 2.2.4 The SEA Consultants considered the revised information. It has been decided in consultation with the Isle of Wight Transport Planners that the revised schemes do not require individual assessment as a part of the SEA because the principles applied through the first assessments should be sufficient. The assessments previously undertaken apply to the majority of the schemes and therefore the mitigation proposed also applies and does not change.
- 2.2.5 SEA consultants have provided some comments on the revised implementation scheme. These are:
- It is clear that the schemes proposed to enhance the Rights of Way network have been planned with consideration of some environmental impacts. For example, it is stated that resurfacing of the Tennyson Trail will be undertaken in accordance with SSSI requirements. The SEA consultants have recommended that it is ensured that all of the schemes should be undertaken in consultation with Isle of Wight Council Ecology Officer to reduce any potential impacts to biodiversity, fauna and flora (point 6 in Table B1). As well as applying the mitigation previously proposed, the SEA consultants have particularly highlighted the commitment the Council has made to investigate the use of sustainable drainage systems to limit surface water run-off and pollution from transport infrastructure, which includes paths (point 7 in Table B1 in Appendix B); and
- One new traffic management scheme is planned for the Whitwell Road, which has not previously been assessed. This scheme involves 'carriageway widening / gateway treatment' in an area which may be unstable. The SEA consultants have identified the need to comply with the previous mitigation measure proposed which is to consult with English Nature, the Environment Agency and Isle of Wight Planning Liaison Group with respect to engineering works in unstable areas (point 3 in Table B1 Appendix B).

3 How consultation responses have been taken into account

- 3.1.1 The flow chart in Section 1.3 indicates where consultation has been undertaken during the process to develop the LTP 2.
- 3.1.2 Summaries of the comments received on the Scoping Report and responses from the Council can be found appended to the ER. Similarly, comments received on the ER and the response from the Council can be found in Appendix C of this document.
- 3.1.3 The ways in which the comments have been taken into account are as follows:
- Comments were received regarding the SEA Framework and the criteria and indicators within it. These comments have been reviewed and most have been used as the basis for amendments to the framework;
- Some comments suggested additional documents to review and additional data sources. These have been considered and documents / sources of information reviewed where they were deemed to be relevant and where they filled an information gap;
- Some comments highlighted inaccuracies in baseline data and these have been corrected where correct data has been provided or it has been possible to be sourced. Any data known to be inaccurate has been removed from the baseline data. The revised data will be used in future SEAs;
- Some comments received suggested improvements to the LTP 2 and these have been taken into account in the SEA Framework and when proposing mitigation. For example, a comment from English Heritage stated that the design and implementation of all transport schemes should ensure that they are integrated sensitively into the surrounding townscape or landscape so that local character is reinforced, rather than eroded. The SEA specifically proposed mitigation for all transport schemes to ensure that street furniture such as bus stops and cycle parking are in line with local design statements and enhance rather than adversely affect the streetscape, especially within Conservation Areas;
- Significant concerns raised regarding instability and coastal erosion have led to a greater discussion of coastal issues within the Plan and the commissioning of a study examining the longer-term implications of coastal erosion in relation to the Island's highway infrastructure. This study will help to inform discussions between the Council and various parties including English Nature, the Environment Agency and English Heritage regarding these issues;
- Several suggestions for amendments of the LTP 2 have been used to directly alter the text of the plan, such as the acknowledgement in the plan that "the Island does not have many natural resources required for highway construction and therefore have to import much of the materials and this can have an environmental impact" (English Nature) which the plan had not previously acknowledged; and
- Finally, in response to consultation, particularly on the ER and provisional LTP 2, the Air Quality and Environment Section (Section I) part of the Five Year Strategy has been rewritten to further underline the importance of the environment, how transport can impact on the environment and how the SEA process and resulting monitoring can help ensure that the necessary mitigating measures are put in place.

4 The reasons for choosing the LTP as adopted, in light of reasonable alternatives

- 4.1.1 The SEA assessed two key strategic options: the plan 'with bids' and the plan 'without bids'. The two major bids are as follows:
- Newport accessibility major bid:

This bid aims to tackle the congestion experienced within Newport, the Island's capital, and improve traffic flow within the town. Due to the traffic generated within the town, the draw of traffic to the town from other areas, and barriers to traffic within the centre such as the River Medina (which traffic can only cross at one point - Coppins Bridge), Newport experiences considerable congestion.

East of Yarmouth major bid:

The East of Yarmouth bid relates to a short stretch of the A3054 to the East of Yarmouth. The A3054 is the strategic route connecting West Wight (Totland, Freshwater and Yarmouth) to Newport and the East of the Island. The section of the A3054 to the east of Yarmouth is experiencing major stability issues due to slumping which require urgent attention.

This bid seeks to undertake extensive ground stabilisation and drainage works with the possibility of the reinforcement of the existing sea defences to allow the road to remain open. Should the road collapse, or during the appropriate works, it would be necessary to close the road and implement a diversion between West Wight and Newport. The likely alternative route would require traffic to use some narrow and unsuitable sections of the Island's highway network. Depending on the area of closure, this may involve routing traffic westwards from Yarmouth via Norton to Freshwater and then along the B3041 into Newport,. It may be necessary for all ferry traffic to use this route to get to and from the ferry terminal at Yarmouth.

- 4.1.2 The assessments have shown that the 'Plan with bids' option is likely to result in significant positive impacts within Newport with respect to congestion and local air quality. The option is also likely to improve accessibility to services and facilities for people within Newport and for people travelling to Newport from across the Island.
- 4.1.3 The east of Yarmouth bid should reduce the risk to people and property from erosion and instability and should avoid damage to the coastline or loss of amenity through reinforcement of the existing sea defences and by not constructing new defences. This bid will also maintain current levels of access (after construction) but could potentially be associated with affects on nearby designated nature conservation sites (SSSI, SAC, SPA and Ramsar site) and the location of this road on the coast could be vulnerable to the effects of climate change such as sea level rise.
- 4.1.4 The 'Plan without bids' option will result in much less significant improvements to accessibility and local air quality within Newport. In addition, movement across the Island would continue to be restricted at peak times due to congestion within Newport, without the east of Yarmouth bid, there are likely to be adverse impacts with respect to coastal instability and accessibility in West Wight if the section of the A3054 fails. Therefore, in conclusion, the 'Plan with bids' option is associated with more environmental benefits than the 'Plan without bids' option (along with amendments to the Plan in response to suggested SEA mitigation) and therefore this is the version of the plan that has been adopted.

5 Proposals for monitoring

5.1 INTRODUCTION

- 5.1.1 The SEA monitoring strategy has been amended following the consultation on the ER.
- 5.1.2 The LTP2 must be monitored to determine how well it is meeting the objectives that it has set out to achieve. The monitoring will be undertaken by collecting certain information called indicators and presenting the results in an Annual Monitoring Report (AMR). An example of one of the LTP2 indicators is: "Percentage of crossings with facilities for the disabled".

5.2 MONITORING STRATEGY

- 5.2.1 The SEA Framework set out a number of indicators associated with the SEA Criteria. Many of these indicators will be monitored as part of the monitoring strategy for the LTP 2 and will be reported in the AMR. In order not to duplicate work, the SEA monitoring will focus on monitoring a number of additional indicators in order to cover a breadth of environmental factors with a view to identifying any significant unforeseen effects. It is also proposed that in order to efficiently collect and record data within the Council, monitoring for the *Island Plan* and the LTP 2 should be co-ordinated as much as possible. Therefore in selecting indicators for monitoring there has been an aim to monitor the same indicators for both plans as is reasonable.
- 5.2.2 In the ER it was proposed that noise would not be monitored because there were no significant noise effects identified through the assessment. Contrary to the ER (Section 11) it has been decided to recommend monitoring the incidence of noise nuisance relating to transport reported to the Environmental Health Officer because of the requirement of the SEA Directive to monitor for unforeseen environmental effects.
- 5.2.3 Table 2 below presents the additional SEA indicators to be monitored. Reporting will be within a separate section within the LTP 2 AMR. Where Island Plan appears in brackets this identifies indicators which are also proposed to be monitored as part of the *Island Plan* and associated Sustainability Appraisal processes. Targets associated with these indicators are suggested within the SEA Framework presented within the ER (Appendix D).

Table 2: Additional SEA indicators to be monitored

Topic	Indicators	
Soil and geology	Length of road requiring engineering work due to instability on the coastline.	
	Extent and condition of RIGGS and SSSI important for geological processes (<i>Island Plan</i>)	
Water	Number of highways works including measures to reduce surface run-off	
	Rivers of Good or Fair chemical and biological water quality(or other suitable Environment Agency Indicator if replaced in coming years)	
Landscape and Townscape	No. of new or improved roads schemes for which the Isle of Wight Conservation Officer has been consulted.	
	No. of new or improved road schemes within the AONB which take account of the Duty of Regard for the AONB designation and the AONB management plan.	
	No. of new or improved road schemes within the Heritage Coasts which take account of the need to conserve the Tennyson and Hamstead Heritage Coasts declarations.	
	Percentage of new lighting designed to modern "low spill" emitting standards	
Biodiversity, Fauna and Flora	Area and condition of sites of international, national, regional and sub-regional nature conservation significance (<i>Island Plan</i>)	
	Habitat severance attributable to transport projects	
	Populations of wild birds (in particular, woodland and farmland birds) (<i>Island Plan</i>)	

	Progress with Biodiversity Action Plans (Reported 3 yearly by DEFRA) (<i>Island Plan</i>)
Archaeology and Cultural Heritage	Number and condition of archaeological sites, monuments, structures and buildings, maritime and coastal heritage sites recorded on the Isle of Wight Historic Environment Record (<i>Island Plan</i>)
	No. of new or improved road schemes for which the Isle of Wight Conservation Officer has been consulted.
Climatic factors	Average age of vehicles on the Island (where data is available from the DA)
	Proportion of major new transport infrastructure developments designed to take account of potential effects of climate change and flood risk.
	Contribution of transport related CO ₂ emissions to total emissions.
Noise and Vibration	Number and nature of complaints to the Environmental Health Officer regarding transport related noise (e.g. road traffic, ferries, aircraft, and maintenance).
Material assets	Proportion of recycled material used in road repair and construction per annum
	Amount of investment per annum in upgrading existing transport infrastructure and provision of new sustainable transport infrastructure.

5.2.4 As adoption of the LTP 2 is ahead of the adoption of the Core Strategy of the *Island Plan* (the first Development Plan Document to be developed), the set of indicators used for the monitoring of the environmental effects of the LTP 2 may change in response to changes to the emerging *Island Plan* Sustainability Appraisal Framework which will continue to evolve after the LTP 2 is adopted.

Appendix A Glossary

Area of Outstanding Natural Beauty (AONB): The primary purpose of the AONB designation is to conserve natural beauty – which by statute includes wildlife, physiographic features and cultural heritage as well as the more conventional concepts f landscape and scenery. AONBs are designated under the National Parks and Access to the Countryside Act 1949, amended in the Environment Act 1995. (Joint Nature Conservation Committee www.jncc.gov.uk/).

Core Strategy: This sets out the long term vision of an area.

Consultation Body: An authority which because of its environmental responsibilities is likely to be concerned by the effects of implementing plans and programmes and must be consulted under the SEA Directive. The consultation bodies, designated in the SEA Regulations are the Countryside Agency, English Heritage, and the Environment Agency.

Environmental Report: A document required by the SEA Directive as part of an environmental assessment, which identifies, describes and appraises the likely significant effects on the environment of implementing a plan or programme.

Heritage Coast: a section of coast exceeding one mile in length that is of exceptionally fine scenic quality, substantially undeveloped and containing features of special significance and interest. The designation is agreed between local authorities and the Countryside Agency as an aid to local authorities in planning and managing their coastlines. (Joint Nature Conservation Committee www.jncc.gov.uk/).

Indicator: A measure of variables over time, often used to measure achievement of objectives.

Local Development Framework (LDF): a portfolio of local development documents which provide the framework for delivering the spatial planning strategy for the area. On the Isle of Wight this has been called the *Island Plan*.

Local Transport Plan (LTP): A statutory document produced by the Council setting out its five year transport strategy and twenty year vision and includes targets for delivery. Annual Progress Reports (APRs) are produced which monitor performance against LTP targets.

NATA (New Approach to Transport Appraisal) - provides a framework within which impacts under the headings of environment, safety, economy, accessibility and integration can be taken into account by the decision-maker. In reaching a decision about a proposal, it is intended that account is also taken of the distribution and fairness of the impacts, the affordability and financial sustainability of the proposal, and its practicality and acceptability to the public. (http://www.cfit.gov.uk/research/10year/second/ad.htm)

National Nature Reserve (NNR): Nationally important sites containing examples of some of the most natural and semi-natural terrestrial and coastal ecosystems in Great Britain. They are managed to conserve their habitats or to provide special opportunities for scientific study of the habitats and communities represented within them. Declared by the National Parks and Access to the Countryside Act 1949 and the Wildlife and Countryside Act 1981 (Joint Nature Conservation Committee www.jncc.gov.uk/).

Nature Conservation: The preservation, management and enhancement of natural plant and animal communities and occasionally modified vegetation, as representative samples of their own kind.

Objective something to be achieved i.e. to improve air quality.

Office of the Deputy Prime Minister (ODPM): The government department which has responsibility for planning and local government.

Ramsar site: designated under the Convention on Wetlands of International Importance, agreed in Ramsar, agreed in Ramsar, Iran, in 1971. Originally intended to protect sites of importance as waterfowl habitat, the Convention has broadened its scope to cover all aspects of wetland conservation and wise use, recognising wetlands as ecosystems that are extremely important for biodiversity conservation in general ad for the well-being of human communities (Joint Nature Conservation Committee www.jncc.gov.uk/).

Regionally Important Geological and Geomorphological Sites (RIGGS): Areas of land of local importance for their conservation of geological and geomorphological features worthy of protection for their educational, research, historical or aesthetic importance. They are not of sufficient significance to warrant recognition as an SSSI.

Renewable Energy: Power from naturally re-occurring resources such as the sun, wind and water.

Right of Way Network (RoW) On the Isle of Wight this is 500 miles of bridleways and footpaths proving public access to all parts of the Island and enable a network or walks and trails including a round the Island network.

Special Area of Conservation (SAC): Internationally important sites designated under the EC Habitats Directive. SACs are areas which have been identified as best representing the range and variety within the European Union of habitats and (non-bird) species listed in Annexes I and II to the Directive. SACs, together with SPAs, form the Natura 2000 network (Joint Nature Conservation Committee www.jncc.gov.uk/).

Scoping: The process of deciding the scope and level of detail of a sustainability appraisal (SA), including the sustainability effects and options which need to be considered, the assessment methods to be used, and the structure and contents of the SA report.

Site of Nature Conservation Interest (SINC): Areas of land and wetland of local importance for the conservation of semi-natural habitats including mosaics of heathland, unimproved grassland, scrubland and plantation and/or habitats which support rare local wildlife species. They may not be of sufficient extent or quality to qualify for national recognition as a SSSI.

Special Protection Area (SPA): classified by the Government under the EC Birds Directive. SPAs are areas of the most important habitat for rare (listed on Annex I to the Directive) and migratory birds within the European Union. SPAs, together with SACs, form the Natura 2000 network (Joint Nature Conservation Committee www.jncc.gov.uk/).

Strategic Environmental Assessment (SEA): A term used internationally to describe an environmental assessment applied to policies, plans and programmes. In this document SEA is used to refer to the type of environmental assessment required under the SEA directive which assesses the effects of certain plans on the environment.

Sustainability Appraisal (SA): A term used to describe the form of assessment that considers social, environmental and economic effects, which incorporate the requirements of the SEA Directive.

Sustainable Development: A term given to the development that is environmentally responsible; the most common definition is from the Brundtland Commission (1987) – "Development which meets the needs of the present generation without compromising the ability of future generations to meet their own needs".

Site of Special Scientific Interest (SSSI): A national suite of sites providing statutory protection for the best examples of the UKs flora, fauna or geological or physiographical features. They are also used to underpin other national and international nature conservation designations. Originally notified under the National Parks and Access to the Countryside Act 1949, SSSIs have been re-notified under the Wildlife and Countryside Act 1981. Improved provisions for the protection and management of SSSIs were introduced by the Countryside and Rights of Way Act 2000 (in England and Wales) (Joint Nature Conservation Committee www.jncc.gov.uk/).

Appendix B Mitigation

Table B1: Proposed SEA Mitigation and the Council's Responses

	Analysis of Five Year Strategy Objectives			
	Suggested Mitigation Council Response			
Crite Sectorang linke mea	"The summary highlights where key areas of potential conflict exist between the Five Year Strategy objectives and the SEA Headline Criteria. The key recommendation resulting from the exercise is that the Section I of Chapter 5 of the LTP 2 is amended to address a broader range of environmental issues linked to the SEA. This recommendation is linked to mitigation proposed from the assessments of the options / measure to meet the within the Five Year Strategy discussed within the next Sections of this report."			
	Detailed Assessment Of Schemes And M	leasures		
No	Suggested Mitigation	Council Response		
1	"The consideration of environmental impacts for major bids and schemes, such as the transport interchange improvements at Cowes and road widening schemes through Environmental Impact Assessment and NATA."	Agreed – DfT require all major schemes to undertake a NATA appraisal which includes an Environmental Impact Assessment.		
2	"Ensure transport engineering works are undertaken in accordance with the Isle of Wight Shoreline Management Plan."	Agreed. See Section I - Improving Air Quality and the Environment		
3	"Consult with English Nature, Environment Agency and Isle of Wight Planning Liaison Group with respect to engineering works in unstable areas."	Agreed – currently consultation undertaken on a scheme-by-scheme basis. Organisations to be added to our 3-scheme consultation list (see point 6 below).		
4	"Work with Isle of Wight Planning Liaison Group to ensure that developments are located to reduce the need to travel."	Agreed. See Section K – Ensuring Effective Management		
5	"Ensuring measures to integrate biodiversity enhancements into final scheme designs are improved such as native planting alongside road widening schemes."	Agreed. See Section I, - Improving Air Quality and the Environment		
6	"Consult with Isle of Wight Council Ecology Officer to reduce impacts to biodiversity, fauna and flora."	Agreed – currently Council undertake a 3 stage consultation process for all highway schemes. Consultation is undertaken at preliminary, detailed and construction stages. This consultation includes Council's Countryside Manager and Ecology Officer. (See Section K – Ensuring Effective Management)		
7	"Investigate the use of sustainable drainage systems to limit surface water run-off and pollution from roads and other transport infrastructure, such as car parks."	Agreed. See Section I - Improving, Air Quality and the Environment.		
8	"Consult with the Environment Agency with regard to flood risk."	Agreed – currently consultation undertaken on scheme-by-scheme basis. Environment Agency to be included in 3 stage consultation process if required (see point 6). (See Section K – Ensuring Effective Management)		
9	"Expand the discussion of environmental issues to cover a broader range of issues such as planning for climate change, instability, biodiversity etc within Section 5, I regarding "Improving air quality and the environment".	Agreed – Council have expanded Section I - Improving Air Quality and the Environment) to include environmental issues.		

11	"Ensure that street furniture such as bus stops and cycle parking fit in with local design statements and enhance rather than adversely affect the streetscape, especially within Conservation Areas." "Ensure that infrastructure within the countryside especially within AONB, such as paths, styles, signs conform to the appropriate	Agreed – Council are currently compiling a design guide which will address these issues. Guide is being produced in consultation with others including Conservation and AONB
12	design guidance." "Ensure the Isle of Wight Council conservation team and AONB office are consulted with respect to heritage issues and effects within the AONB and Heritage Coasts."	Officers. Conservation, countryside and AONB officers already included in the Council's 3 stage consultation process (see point 6). See Section I - Improving, Air Quality and the Environment.
13	"Ensure that any routing of traffic avoids the AONB, Heritage Coasts, conservation areas and sensitive areas such as residential as far as possible."	Partial agreement - Island has very limited road network making it difficult to avoid sensitive areas.
14	"Lighting technology installed should limit over-spill to protect the darkness of night-skies."	Agreed. See Section I – Improving Air Quality and the Environment.
15	"More detail regarding the measures to promote the use of alternatives fuels should be included within the LTP2."	Agreed. See Section I - Improving Air Quality and the Environment.
16	"Construction impacts should be considered and mitigation such as limiting surface water run-off and risk of pollution to watercourses and erosion; noise from engineering works."	Agreed. See Section I - Improving, Air Quality and the Environment.
17	"Limit noise pollution through low noise surfacing, noise attenuation measures in new schemes in the future."	Agreed – where appropriate. See Section I - Improving Air Quality and the Environment.
18	"Develop a LTP 2 target for the use of recycled materials within transport engineering works."	Possible – Council still considering target for use of recycled materials. It may not be possible to use such materials in some instances and investigations are being undertaken on appropriateness of materials in respect of possible reduced skid resistance, safety and life expectancy (See Section N – Performance Indicators: Other Indicators Considered).

Appendix C Environmental Report Consultation Responses

Table C1: Environmental Report Consultation Comments and the Council's Responses

Summarised Comments on SEA Environmental Report	Response to Comments from the Isle Of Wight Council	
Southern Water		
No comments other than, "we support mitigation measures outlined in 1.7.7 of the Non-Technical summary that seek to protect water resources used for public water supply from pollution".	Support for the measures in 1.7.7 is noted.	
Isle of Wight Friends of the Earth		
While we are otherwise impressed by the thoroughness of the report we were disappointed by the weak approach to climatic factors. Climate change is 'the most serious threat facing mankind' (UK government Chief Scientist) and should be tackled much more decisively.	The draft ER recommended that the LTP include a chapter highlighting environmental issues on the Island, including how these should influence the content of the LTP 2. In response to this recommendation, Sections E and I have been extensively amended to take account of the comments received and the Plan acknowledges the implications of climate change and what these might mean for infrastructure. The LTP 2 seeks to limit overall traffic growth on the Island to 2.3% up to 2011. The LTP 2 also seeks to achieve a 12.1% increase in bus passenger journeys compared to 2003/04 levels. The LTP 2 also seeks to achieve a 20% increase in train passenger journeys, compared to 1999/2000 levels by 2010/2011. The LTP 2 will therefore contribute to a reduction in greenhouse gas emissions compared to those that would occur without the LTP 2.	
Section 1.7.7 We are particularly concerned that the only reference is to ""planning <u>for</u> climate change". We need a lot more than that. The purpose, after all, is stated in 2.2.2: "To provide for a high level of protection of the environment".	As noted above the LTP 2 now acknowledges the potential impacts of climate change but also seeks to reduce the contribution of transport on the Island to climate change.	
Section 6.3.6 Air Transport: "This potential conflicts" It definitely conflicts, as air travel is the most fuel inefficient means of transport by a long way. We are glad to see a request for explicit impact assessments in 6.3.8, but simply suggesting that "the potential for making the Airport 'carbon neutral' should be explored" is feeble, and rather dubious in the light of recent research on the methane emissions of growing plants.	The long term strategy of the LTP 2 acknowledges the role of the airports on the Island as a part of the existing the transport network, however, it is our understanding that no expansion of the airports is currently envisaged and in any event the LTP 2 has little influence over activities at the airports.	
Section 6.5.1 Economic Regeneration. "this objective has the potential to increase the number of motorized journeys and therefore emissions". This is	The Plan recognises the importance of regeneration and seeks to put in place measures and initiatives, which will help limit traffic growth to 2.3%.	

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undisputable, yet later in 8.5.4 you suggest 'moderate positive' for Climate factors. What initiatives are supposed to do that? LTP2's objective on traffic growth is to limit it to3% (LTP2 section J Target 18). This will result in increased emissions, not decreased.	It should be noted that the annual average traffic growth experienced within the LTP1 period was 3%.
Compatibility Analysis: SEA headline criteria Vs LTP2 Five Year Strategy Objectives: Climatic factors (page not numbered) vs 5. To tackle congestion: "Reducing congestion does not address overall emissions of greenhouse gases from vehicles". Yet in the worksheets on SEA Headline Criteria vs j.3.3 Summary of Key Actions Tackling Congestion, under Climatic factors you say: "will reduce traffic levels", i.e. a negative growth percentage.	The worksheet has been used to has assess the measures in the provisional LTP 2 within Section J which are proposed to help achieve the objectives "To Tackle Congestion". Some of these measures include ways to reduce traffic levels and achieve a better modal split (which would reduce greenhouse gas emissions) in order to tackle congestion.
The entries dealing with climatic factors need to be corrected or tightened up. It is far too important to be left in this state.	Please refer to the comments provided above. As noted above the LTP 2 has been amended to give greater recognition to environmental factors, including climate change.
Northwood Community Partnership	
Both main schemes (especially Newport) could undoubtedly have many detailed variations (alternatives). Environmental impact would presumably vary for each one	The SEA has identified the need for EIA for major bids. Some environmental effects will need to be dealt with at this detailed level as opposed to at the strategic (SEA) level.
Accuracy depends upon implementation success. For example, in Newport, there would be a finite probability that 'improvements' could cause more congestion, or displace congestion to another location.	Monitoring of the LTP 2 will identify how well it is meeting the objectives (which include tackling congestion) set out within it and the SEA criteria.
Section 9.1.2: bullet 13: Routing of traffic to avoid the majority of the countryside, and residential areas, may be challenging.	Agreed and highlighted by the Council in our response to SEA mitigation recommendations.
Section 9.1.2: Add: Consideration of carrying out works off peak / overnight to reduce congestion.	This is something the Council already consider when planning engineering works. It is important that consideration is given to the problems associated with creating noise at night.
Many of the SEA criteria appear subjective. For those, are the results considered to be statistically significant?	Due to the strategic nature of SEA, criteria and the assessments are often likely to be subjective.
Where the Environmental Effects are perceived relevant to the Northwood Community Partnership (e.g. within the parish or associated travel routes), an approach could be made together with specific details. It may be that such requests would be qualitative	The Council will consider including the Northwood Community Partnership in future applicable consultation exercises.

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in nature	
Section 1.5.3: Bay Area? Which 'Bay Area'?	The Bay Area referred to in the Plan includes Sandown, Lake and Shanklin.
Section 1.6.5: Is this not to the EAST of Yarmouth	This comment is correct. It should read as 'East of Yarmouth'. The Title of the section was incorrect, but location correctly described in the supporting paragraphs LTP 2 has been amended to correctly describe the area concerned and an addendum added to the ER.
Appendix E: Cowes matrix: Bus gate Newport Road – Nodes Road	This is a strategic Plan and as such cannot include the details of every scheme.
The description in the accompanying notes reads 'priority for buses at junction': Currently the road has no traffic control into Nodes road (bearing left), and traffic typically flows freely. When the traffic lights are red for northbound traffic (wishing to remain on Newport Road i.e. straight on), then once approximately five cars are waiting, the road width precludes left bound traffic passing. It is not clear what the scheme objective is, nor how it would be implemented. (Increase travel choice' is marked as 'major positive'!). The matrix claims no safety effect. This could be negative due to traffic filtering and merging close to junction.	
4. A 'reading guide' would be useful, as would a block diagram showing where this document sits in relation to the LTP2, with arrows showing flow of information from various parties.	The Council will bear this suggestion in mind when preparing subsequent Environmental Reports.
There appears to be much repetition. Could the content that is original be communicated in a more efficient manner?	The Council will bear this suggestion in mind when preparing subsequent Environmental Reports.
English Nature	
Section 5.3 This section does not mention the international and national importance of the island for it's geology and geomorphology. The Island exhibits a great diversity of geology within a comparatively small area and is considered of outstanding geological significance. The interest is reflected in the fact the Island has 15 Sites of Special Scientific Interest which have nationally important geological and /or geomorphological features of interest and the fact that your council is currently considering making an application for EU 'Geopack' status because of the international importance of the Islands geology e.g. the oldest exposed rocks i.e. the Walden Group were laid down a 120 million years ago – these rocks are one of the richest sources of fossilised	Data relating to geology is presented within Appendix C. Section 5.3 is a brief characterisation of the Island. This comment provides some additional data which can be considered in subsequent SEAs. LTP2 has also been amended and relevant sections rewritten in partnership with English Nature.

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dinosaur bones in Europe and one of the most important in the world.	
Section 5.3.7 The chalk grasslands, maritime cliffs and slopes and estuaries are not the only habitats which are particularly important at an international, national and regional scale on the island. Other habitats in this category should include intertidal and subtidal reefs, sea caves, itertidal mudflats and sandflats (together these support a rich and invertebrate assemblage which provides a vital food source for large numbers of over wintering and migrating birds that visit the Solent shores), heathland, shingle habitats, coastal gazing marsh and associated habitats and saline lagoons – listed as priority habitat in Annex I of the EU habitats Directive. This section does not mention the importance of the island for rare and scarce species such as internationally rare Bechstein and Barbastelle bats, populations of wintering and migrating birds on the Island that form part of larger internationally important populations associated with Solent and Southampton on Water SPA and Ramsar Sites, mammals including red squirrel and dormouse, nationally important assemblages of rare e.g. Glanville Fritillary and scarce invertebrates e.g. chalkhill blue, nationally rare and scarce plants species including field cow-wheat and the largest population in the world of the rare early gentian, rare species associated with saline lagoons including the rare foxtail stonewort, starlet sea anemone and Bembridge beetle.	This data can be considered in subsequent SEAs. It does not affect the assessments already undertaken. LTP2 has also been amended and relevant sections rewritten in partnership with English Nature
Section 5.4.4 this should include climate change such as increases in winter rainfall and decreases in summer rainfall and, increase in wave sizes hitting the coast are likely to result in change to the extent and range of habitats and species, e.g. extent and diversity of maritime cliff and slope habitats and associated species.	This can be taken into consideration in subsequent SEAs.
Sea level rise will result in changes in the amount of intertidal habitats such as losses of mud and sandflats and Salt marsh as result of 'coastal squeeze' which will need to be offset by managed realignment.	LTP2 includes reference to climate change and potential sea level rise.
The increase in demand on water supplies as a result of the increased Islands population size, have the potential to have adverse impacts on the wetland habitats by reducing the availability of water. Population increase also has the potential to increase the likelihood of adverse impacts on the islands habitats and species as a result of increased development.	Impacts on biodiversity and designated nature conservation sites have been considered within the SEA. The LTP 2 cannot influence population of the Island or water supply. This has been discussed within the Sustainability Appraisal Report for the Island Plan Core Strategy which can be accessed at www.iwight.com/transport
Table 5.1 Soils an geology should include impacts on geological and	Table 5.1 ER includes consideration of RIGGS, SSSI and SINCs. Geomorphology has been considered fully within the assessments. Subsequent SEAs could present this

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geomorphological designated sites i.e. SSIs, RIGGS sites and SINCs	issue to explicitly include geomorphology.
Water: Current and future increase demand on water supply and the potential impact on wetland habitats is another environmental issue.	Although we agree that this is an environmental issue on the Island, the LTP 2 has no influence on water supply.
The key issues and problems for biodiversity, Fauna and Flora should be impacts of the plan on designated site features, protected species BAP habitats and species.	The impact of the plan on these factors has been considered within the assessments. Subsequent SEAs could present this issue as suggested.
Climatic factors: Climatic factors such as sea level rise and increased rainfall are likely to have impacts on biodiversity, fauna and Flora and geological and geomorphological features.	The LTP2 includes reference to climate change and potential sea level rise.
Material assets: maintenance of the transport infrastructure will have impacts on biodiversity, fauna and flora e.g. stabilisation of A3055 at Undercliff Drive is impacting on sections of the Compton Chine to Steephill Cove SSSI.	Potential effects of transport infrastructure on biodiversity have been identified within the assessments. This issue can be highlighted more clearly in subsequent SEAs.
Section 5.7.7 Soil Geology and material assets: this should include conflicts with maintaining and enhancing the Islands biodiversity, fauna and flora and geological and geomorphological interest features as result of reducing risk to property from erosion, instability and flooding and maintaining the infrastructure network.	These issues are now more fully covered in Sections E and I of the final LTP
The island does not have many natural materials required for highway construction and therefore have to import much of the materials and this can have an impact on the environment.	The LTP 2 has been amended to include this statement.
Section 6.3: The vision statements could also potentially conflict with biodiversity, fauna and flora and soil and geology because:	The LTP recognises potential conflict in maintaining transport infrastructure that runs through sensitive and coastal areas. The Plan explains that works in these areas will
It is maintaining or creating the transport infrastructure in places which are likely to adversely impact on biodiversity, fauna and flora, and geology and geomorphological interest feature e.g. scientific studies undertaken by the Environment Agency suggest maintenance of culverts along the military road on the south coast is adversely affecting the fluvial processes which maintain the Chines which in turn maintain internationally important vegetated sea cliff interest feature; (this feature is one of the reasons for designating the South Wight Maritime SAC).	be subject to fullest possible discussions and considerations of options.
Interfere with coastal/mass movement processes which maintain biodiversity, fauna and flora and geology and coastal geomorphology e.g. A3055 Undercliff Drive stabilisation scheme.	

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Maintaining transport infrastructure on sea walls could potentially restrict the opportunities for managed realignment of internal habitats necessary to offset the effects of coastal squeeze e.g. Embankment Road at Bembridge.	
Engineering works could adversely affect biodiversity, fauna and flora by direct loss of habitats and indirect loss e.g. interfering with coastal processes and import of material e.g. aggregates to carry out the works.	
Section 6.3.6: This should include impacts of air transport on biodiversity, fauna and flora such as disturbance/interference e.g. bird strike with wintering, migrating and breeding birds.	The long term strategy of the LTP 2 acknowledges the role of the airports on the Island as a part of the existing the transport network, however, it is our understanding that no expansion of the airports is currently envisaged and in any event the LTP 2 has little influence over activities at the airports. The Council does not feel that issues such as bird strike at the Island's airports are something that the LTP 2 can influence.
Section 8.2.3 West of Yarmouth major bid option 1: Discussions with your council's Ecologist Dr Colin Pope, indicate a) that this bid must be referring to the east of Yarmouth and not the west of Yarmouth and b) there are a number of long term sustainability issues associated with this coastal area which are likely to have a significant effect on the Yar Estuary SSSI, Solent Maritime SAC and Solent Southampton Water SPA and Ramsar site. The Issues are detailed in the 'West Wight Coastal Management Strategy' and should be considered by the SEA.	Sounds like this has implications for the LTP. How does the LTP handle issues in relation to potential impacts – both in terms of detailed projects, e.g. culverting and larger scale projects. The bid is referring to east of Yarmouth. This was an error in the title of that section and has been corrected in the final Plan (see comments above) This will be dealt with in more detail in consultation with English Nature regarding this scheme. The Scheme will be subject to EIA.
Section 8.5.2: Reference should be made to potential negative affects on species and designated geological and gemorphological sites.	LTP2 sets out an improved protocol under which schemes can be considered. Discussions will take place with internal and external partners as part of the scheme development process.
Section 8.5.5: Engineering works could also potentially affect geological and geomorphological sites.	See above
Section 8.5.18: We question the claim there is no effect after mitigation with respect to this element of the strategy for biodiversity, fauna and flora in particular the impact on maintaining road culverts on the vegetated sea cliff interest and associated species associated with Chines found along Military Road as mentioned above. Maintaining the present Military Road alignment may also restrict the landward migration/development of this interest feature particularly on the cliff top – in some places the cliff edge is relatively close to the road. We have agreed with Chris Wells from the Highways Department that a meeting should be held between Highways and	The Council have discussed this issue with English Nature and others and will be meeting them to discuss this issue in the near future.

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other relevant IWC staff to discuss the long term issue of maintaining roads in coastal areas liable to flooding, erosion and slumping.	
Section 8.7.5: What about negative impacts on biodiversity, fauna and flora and geology and geomorphology as result of the reinforcement of existing sae defences?	The nature of potential works on sea defences are uncertain. The projects will be subject to EIA when potential effects should be assessed in detail.
Section 8.7.8 What about the benefits of maintaining geological and geomorphological processes as result of the 'do nothing' option.	The worksheet acknowledges that the 'do nothing' option allows natural coastal processes to occur. This does not affect the major negative effect identified associated with risks to property.
11.2 English Nature and it's successor organisation, Natural England, will be able to provide data on the condition of designated sites which could be affected by the LTP 2. Will also hold a number of scientific reports on habitats and species.	This data will be required as part of monitoring of the LTP 2 and we are grateful for this comment.
11.2.3 We are assuming impacts on geological and geomorphological sites/features will be monitored under this criteria.	The indicator "Extent and condition of RIGGS and SSSI important for geological processes" will be monitored.
Section 9.1.2: Bullet point 2: We question the claim that mitigation will be achieved by carrying out engineering works in accordance with IOW Shoreline Management Plan. Many of the current policies in this document may not be sustainable and may well need to be revised during the production of second generation Shoreline Management Plans.	The engineering works will be subject to necessary considerations and appropriate assessment .
This section should emphasise that damage to irreplaceable wildlife assets should be avoided. Greater emphasis should be placed on opportunities to deliver nature conservation targets such as BAP targets.	More detail on monitoring has been provided in the SEA Statement, (Section 5).
Additional mitigation measures should be:	
Consult with IWC geologists and any RIGGS groups on impacts to geological or geomorphological sites.	
Facilitate and encourage the greater use of public transport.	
■ There should be more information on how biodiversity actions will be monitored.	
Appendix C Landscape and townscape, figure 4.2 this figure only shows one of the Islands five SACs i.e. South Wight maritime SAC. The other SACs not shown or not clear are Briddleford Copses, Isle of Wight Downs, Solent maritime and Solent and Isle of Wight lagoons. It also does not include special Protection Areas and Ramsar	It has proved difficult to illustrate these areas on a map of this scale, however Sections E and I of the LTP have been extensively revised to more closely reflect the extent and coverage of areas of nature conservation. These revisions have been made in discussion with English Nature and others.

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sites. It does not appear to show the correct extent of some SSSIs e.g. Compton Chine to Steephill Cove. We appreciate accurate mapping of the site of all these sites is difficult using this scale of plan.	
Biodiversity, Fauna and Flora: The sentence on 'Other SACs' should include the Isle of Wight Downs SAC and the Solent and Isle of Wight Lagoons SAC.	The baseline data will be amended for use in subsequent SEAs.
Table C1 Condition of SSSis on the Isle of Wight: This table does not accurately reflect the current conditions of SSSIs on the Island. The current information is on attached table.	The baseline data will be amended for use in subsequent SEAs, although this may require updating when SEAs are undertaken.
Other sources of data:	This additional data should be helpful in subsequent SEAs and will be reviewed for
English Natures website www.english-nature.org.uk which has a wider range of nature conservation information including nationally important habitats and species on the IOW, duties of public bodies including the IOW council with respect to designated sites i.e. SSSIs, SPA and Ramsar and SACs and National Nature Reserves and publications including various Isle of Wight habitat and species survey reports – obtained via a search and English natures Public Service Agreement on SSSis.	appropriateness when necessary.
Solent European marine site – English Natures advice given under regulation 33 (2) of the conservation (Natural habitats & c.) regulations 1994, 18 October 2001.	
South Wight Maritime European marine site- English Natures advice given under regulation 33 (2) of the conservation (Natural habitats & c.) regulations 1994, 18 October 2001.	
Isle of Wight Natural Area Profile, English nature 1998.	
Phase 1 of 2 soft cliff survey of the Isle of Wight, Tolhurst, R. 1996.	
Draft isle of Wight Soft Cliff Vegetation. Description and Assessment. Cox, J R, 1998.	
Trends: Breeding Lapwing and redshank and two other key bird species which are rare and declining on the Island.	The baseline data will be amended for use in subsequent SEAs, although this may require updating when SEAs are undertaken.
Losses of intertidal habitats as result of coastal squeeze	
Issues: Improvements to the transport network may lead to the loss or decline of species on the island as result of habitat fragmentation.	Habitat fragmentation has been considered in the SEA and is covered by a SEA Criterion. However, the assessments based on the information available did not identify any potential effects with respect to fragmentation at this stage. However, it is

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	possible that such effects could be identified at a later stage through EIA and suitable mitigation will be required if this occurs.
Soils and Geology: In summary, the Islands geological interest principally relates to a) geological time known as the Cractaceous period, which extends from about 144 million years to 65 million years ago. Rocks of this age dominate the southern part of the island and include sands laid down between 65 million years to 30 million years as result of changes in sea levels. Little is known of the geological history of the Island from about 30 million years to 2 million years ago, known as the Quaternary period.	Soils and geology baseline data is presented within Appendix C of the ER. We feel that the data is adequate but this additional data will be considered in future SEAs.
Other sources of data: geological conservation Review Series. Joint nature Conservation Committee	These additional sources of information will be considered in future SEAs.
IOW Local Geological Action Plan.	
Water issues: Increasing demands for water supply as result of increasing population is likely to exacerbate the impacts on wetland habitats and species on the Island, particularly the already over abstracted Eastern Yar Catchments.	Impacts on biodiversity and designated nature conservation sites have been considered within the SEA. The LTP 2 cannot influence population of the Island or water supply. This has been discussed within the Sustainability Appraisal Report for the Island Plan Core Strategy which can be accessed at www.iwight.com/transport
Appendices: In the matrices included as appendices there are a number of examples where reference to designated sites for conservation should be made. For example, the assessment workshop tables have a section which describes the value and vulnerability of the area to be affected which recognises the Island contains a wealth of designated sites for nature conservation and a variety of BAP priority habitats should be cited.	Although specific sites have not been named, the assessments have considered potential impacts on designations sites.
The matrices repeatedly refer to the need 'to avoid net lossto designated sites' under the biodiversity, fauna and flora criteria. This does not accord with objectives set out in planning policy statement 9. The Governments key objectives for planning is:	The SEA Framework includes a sub-criterion to enhance biodiversity and the variety of habitats on the Island. However, the SEA Framework will be amended in line with this comment for future SEAs. The SA Framework for the Island Plan includes a sub-
To conserve, enhance and restore the diversity of England's wildlife and Geology by sustaining, and where possible improving, the quality and extent of natural habitat and geological and geomorphological sites; the natural physical processes on which they depend; and the populations of naturally occurring species which they support.	criterion to enhance SSSI and other wildlife sites.
In addition your council has a duty as a Public Body under the 1981 Wildlife and Countryside Act (amended by 2000 CROW Act) in exercising your statutory functions	

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to further enhance SSSIs.	
Appendix E: The SEA Headline Criteria for soils and geology in the first matrix does not include the need to avoid loss of designated geological and geomorphological sites. It seems to us that this section is relevant to dealing with these interest features.	The SEA framework includes a sub-criterion "To achieve no net loss of areas important for geological processes", which was suggested as an objective in previous consultation with English Nature. This will be monitored with the indicator "Extent of RIGGS and SSSI important for geological processes" which was also suggested in previous consultation with English Nature.
Compatibility Analysis: SEA headline criteria Vs LTP 5 year strategy objectives – table. The table recognises that there could be a potential conflict between climatic factors and strategy objective 2. We consider greater emphasis should be placed on the value and vulnerability of coastal areas and clear policy guidance will need to be given to steer engineering works away from areas at risk of flooding and coastal erosion where possible.	As a result of the SEA and consultation responses received the Council are placing greater emphasis on the vulnerability of coastal areas and are putting in place measures to address these issues such as liaison with the relevant parties and the commissioning of an study looking at the implications of transport infrastructure within coastal and unstable areas.
Newport Accessibility Bid table: Does not mention the River Medina SSSI is component site for the Solent and Southampton Water Special Protection Area (SPA) under SEA biodiversity criteria.	The worksheet states "River Medina is not a designated site within the development envelope in Newport but is designated as a SAC and SSSI beyond this boundary towards Cowes". We feel that potential impacts on t these sites have been adequately covered.
West of Yarmouth Major Bid Option: This does not mention the Yar Estuary SSSI is component site for the Solent and Southampton Water special Protection Area (SPA) and the Solent Maritime SAC under SEA biodiversity criteria.	This has been noted, however, the potential effects on this SSSI have been considered within the assessments.
Update of SEA: There are future schemes which at this stage it was not possible to give even a broad prediction of impact as the details of the scheme are still unkown. We therefore recommend that the relevant parts of SEA is updated when further details of the scheme such as the PEoW network extension and cycle routes are known.	The SEA has been updated to take into account further details on the measures to improve the RoW network and the implementation section of the LTP 2.
The SEA should also be updated to take into account these changes.	
Finally it is not clear how the lessons learned/conclusions from the SEA process will be fed into the main LPT2 document. It is essential this happens to ensure the plan sufficiently considers the impact on environment. Recent discussions with your council's Highways Policy Officer, Chris Wells indicated that GOSE considered LPT2 plan needed to give greater consideration to the environment. Integration of the two documents would help achieve this aim.	This comment has been addressed by the preparation of the SEA Statement, which demonstrates how the SEA has been taken into account.

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The Wildlife Trust	
The Hampshire and Isle of Wight Wildlife Trust has an interest in a broad range of sustainability issues centred on people and wildlife and promotes nature conservation in the two counties. The trust believes that the Island's wildlife and natural beauty is a huge asset that should be both enjoyed and protected. The Island benefits from having a number of European and nationally designated sites for nature conservations as well as sites locally important for wildlife.	No response required.
The trust is pleased to see the Environmental report (ER) for the SEA of the IoW LTP2 recognises the importance of protecting the rural environment and areas important for nature conservation. However the trust would like to make the following general comments.	The assessment worksheets demonstrate that permanent and long term effects have been considered and therefore the Council considers that the SEA has given adequate consideration to longer term effects. In addition, any projects which gave rise to potential effects on the areas mentioned would be subject to EIA and/or appropriate
Overall the SEA recognises the immediate environmental impacts of the plan but the medium and longer term impacts on sustainability need strengthening. For example, the Yarmouth bid would lead to longer term sustainability issues which are likely to have a detrimental effect on the Yar Estuary SSSI, Solent maritime SAC, Solent and Southampton Water SPA and Ramsar site.	assessment.
Acknowledgement of Designated sites: The trust is content that the ER recognises the potential impact of the LTP2 on the Solent Maritime Special Area for Conservation (SAC). However, we feel that overall both the ER and the LPT2 lack acknowledgements of specific designated sites.	Sections E and I of the LTP have been extensively revised to more closely reflect the extent and coverage of areas of designated sites of nature conservation
EA for the SEA of the LPT2: In the matrices included and appendices there are a number of examples where reference to designated sites for conservation should be made. For example, the Assessment Workshop tables have a section which describes the value & vulnerability of the area to be affected which that recognises that the Island contains a wealth of designated sites for nature conservation and a variety of BAP priority habitats. Examples of both designated sites and BAP priority should be cited.	Although specific sites have not been named, the assessments have considered potential impacts on designations sites.
The trust agrees that the "plan with bids" option will bring considerable benefits to the people of the IoW however; the assessment should mention designated sites which might be affected.	The detailed assessment worksheets mention the designated sites which might be affected.
The table assessing the Newport accessibility bid should mention the Solent and	We acknowledge that this area is also covered by these designations and the SEA

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Southampton Water Special Protection Area (SPA) and Ramsar site under the SEA biodiversity criteria.	Consultants did take into account the importance of this area in undertaking the assessment of the bid.
Likewise, the West of Yarmouth major bid table, under SEA biodiversity criteria should also make reference to the Solent Maritime Special Area for Conservation (SAC) and the Solent and Southampton Water SPA and Ramsar site as well as the SSSI and SINC.	See above comment which applies to this bid.
Additionally, the trust wonders whether an error has been made and the bid should be referring to the East of Yarmouth rather than the West.	The bid is the East of Yarmouth. This has been amended.
LTP2 the map on page 18 of LPT2 showing designated sites does not show Special Protection Areas (SPAs) or Ramsar sites, these should be added.	Same as EN comment - see above for response.
As in the case with the ER for the SEA the LTP2 does not to mention specific nature conservation designations when it refers to the various transport projects. The Cowes Regeneration project recognises zone 4 as an environmental priority area which is environmentally sensitive this section should be expanded to mention European designations that might be affected. More specific details of measures to enhance biodiversity of the river valley and estuary could also be added.	The revised LTP 2 now includes an expanded Section I which acknowledges these areas.
Compatibility Analysis: SEA headline criteria Vs LTP2 5 year strategy objectives – table: The LTP2 five year strategy objective 2. more emphasis should be given to the value and vulnerability of coastal areas and clear policy guidance will need to be given to steer engineering works away from areas at risk of flooding and coastal erosion where possible.	Same as EN comment – see previous response.
Assessment of significant effects – Appendix E – Matrices and Worksheets, compatibility matrices: The Trust is pleased to see that the table recognises the potential conflict between SEA headline criteria, geology and soils and maintenance of roads in areas in instability. It should also be recognised that some of the most important ecological sites can also have significant value for biodiversity. For example, the Undercliff Drive, St. Lawrence has areas of bare ground important for invertebrate fauna which are dependent on the instability of the land.	This has been noted. SEA baseline data will be amended to include this. The baseline data will be used in future SEAs.
European habitats Directive 1992: Chapter 8, para. 8.11.5 (p46) recognises the potential need for an Appropriate Assessment due to the potential impact on European Designated Sites. The Trust would like to draw your attention to the recent European	The Government Office for the South East has advised that the ruling will not apply to the LTP 2 due to the timing of the preparation and adoption of the Plan.

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Court of Justice decision made on 20 th October 2005 on case C-6/04 regards to the EU Habitats Directive. This makes it clear that plans must be assessed for there impact on protected sites supporting natural habitats and wildlife thus development plans including Transport Plans are subject to an Appropriate Assessment.	
Update of SEA: the Trust realise the SEA is only able to give broad predictions of impact. Even so there are certain future schemes where at this stage it was not possible even to give a broad prediction of impact as the details of the schemes were still unknown. The Trust requests that parts of the SEA are updated when further details of schemes such as the PRoW network extension and cycle routes are known.	This has been undertaken (see Section 2.2 of the SEA Statement).
The Trust is content that section 5.4 Future Baseline recognises that the environment is constantly changing as a result of natural processes. It should be recognised that the SEA and the Transport Plan may need to be updated in the future to take in to account of any natural changes.	The Government recognise that LTPs may need to be amended to take account of changes and updates. The IOW Plan has as a result been produced in individually numbered sections to allow for any necessary revisions including changes to the SEA.
Additionally, LTP2 states that a long term strategy is currently being put together looking at the causes and effects of subsidence at Ventor. The findings of this strategy should be fed into SEA and LPT2.	The LTP2 gives details of land instability problems experienced at Ventnor. Ongoing investigations are helping inform the size and nature of the problems. Once concluded the Council will be discussing a range of possible longer term options with relevant partners.
Mitigation; the Trust support consultation with the Isle of Wight Ecology Officer to reduce impacts to biodiversity, however it should be emphasised that damage to irreplaceable wildlife assets should be avoided. The mitigation measures mention integrating biodiversity enhancements into final schemes however, the Trust feels that there is not sufficient emphasis on opportunities to deliver nature conservation targets such as BAP targets. Finally there should also be more information on how biodiversity actions will be monitored.	See Section 5 of the SEA Statement for details of proposed monitoring, which includes the indicator "Progress with BAPs".
Integration of SEA and LPT2: Finally important that the SEA and the LTP are not treated as two separate documents but should be developed concurrently and lessons learnt from the SEA process should be carried through to the main LTP document. The Trust feels that the LTP2 does not sufficiently consider the impact of the plan on the environment, it is essential that the conclusions of the SEA are fed into it.	The LTP 2 has been significantly amended to include more information about the SEA. The SEA statement presents how the two processes have been integrated and how the ER has been taken into account.
The Countryside Agency	
They have not commented on the SEA Environmental Report sent but they have included a report – 'An Evaluation of the Treatment of Landscape, Biodiversity, Access	No response required

Summarised Comments on SEA Environmental Report	Response to Comments from the Isle Of Wight Council
& Recreation in Isle of Wight's provisional Local Transport Plan'	
However they have included the following the comments:	
The LTP should also refer to wider aspects of its landscape such as registered parks and gardens and areas of local landscape value.	Section I of the Five Year Strategy has been expanded to include greater consideration of landscape including registered parks and gardens.
The LTP shows no clear indication of it's likeages to the SEA being developed concurrently. However, it should be noted that the accompanying SEA has not been available for review (is available in March 2006). It is important that the LTP and SEA should not be thought of as two separate documents.	The SEA Statement addresses this comment.
Environment Agency	
They do not respond to the ER but have sent a checklist of issues that they consider should be included in the plan.	The Council have considered comments received as part of the preparation of the final Plan.