

Derby City Council
Local Transport Plan 3
Strategic Environmental Assessment
SEA Statement

Derby City Council

Local Transport Plan 3 Strategic Environmental Assessment

SEA Statement

March 2011

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1. Introduction

1.1 Background

Strategic Environmental Assessment (SEA) of Local Transport Plans (LTPs) is required under European Directive 2001/42/EC ‘on the assessment of certain plans and programmes on the environment’ (the ‘SEA Directive’). A Health Impact Assessment (HIA) is required by a number of UK White Papers on public health strategy. Further emphasis has been given by the introduction of the Local Government and Public Involvement in Health Act 2007 and a specific requirement for HIA in the Department for Transport (DfT) LTP3 guidance published in 2009.

The SEA for the Derby Third Local Transport Plan (LTP3) began in October 2009. This SEA Statement is the last of four documents that have been produced as part of the process, the first being the Scoping Report, the second being the Draft Environmental Report and third being the final Environmental Report.

The SEA process for the LTP3 has been carried out independently by Atkins Ltd for Derby City Council.

1.2 SEA Statement

The purpose of the SEA Statement is to describe:

- How environmental considerations have been integrated into the LTP3;
- How the Environmental Report has been taken into account in preparation of the LTP3;
- How the opinions expressed in the consultation on Scoping Report and the Draft Environmental Report have been taken into account;
- The reasons for choosing the Final LTP3 as adopted, in the light of other reasonable alternatives considered; and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the Final LTP3.

The SEA Statement for the Derby Final LTP3 should be read together with the Final Environmental Report.

1.3 Derby LTP3

The Transport Act 2000 introduced a statutory requirement for local transport authorities to produce an LTP every five years and to keep it under review. This statutory requirement was retained in the Local Transport Act 2008 although other aspects of the statutory framework have changed. The Act now requires that LTPs contain policies (referred to as the strategy) and implementation plans (the proposals for delivery of the policies contained in the strategy). There is no longer the requirement for LTPs to be reviewed every five years but that review should be decided at the local level to best fit with other local policies and plans.

The Derby LTP3 sets out a long term strategy for 2011-2026 and the implementation plan covers 2011-2013.

1.4 Strategic Environmental Assessment

The EU Directive 2001/42/EC¹ (the “SEA Directive”) on assessment of effects of certain plans and programmes on the environment came into force in the UK through the Environmental

¹ European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment

Assessment of Plans and Programmes Regulations 2004² (the “SEA Regulations”). The SEA Regulations apply to a wide range of plans and programmes, including LTPs, and modifications to them.

The Department for Transport published updated draft guidance³ in April 2009 on how to carry out SEA for transport plans and programmes in England in accordance with the Directive. In addition, ‘A Practical Guide to the Strategic Environmental Assessment Directive’ by the ODPM, the Scottish Executive, the Welsh Assembly Government and the Northern Ireland Department of the Environment, published in September 2005, provides guidance on how to comply with the Directive in an environmental assessment of a plan or programme. Both of these guides have been considered in the preparation of the SEA for the LTP3.

1.5 Health Impact Assessment

The DfT LTP3 guidance indicates that consideration of ‘Human Health’ is a legal requirement in an SEA and that an HIA is an integral part of an SEA to identify and inform health issues in Plans.

Undertaking an HIA as part of the SEA should provide an evidence base to help the decision making process in developing an effective LTP, and to mitigate the negative effects on health and well-being (whether physical and/or mental health). In addition, it should help:

- secure consistency between the LTP3 and work associated with Sustainable Community Strategies and Local Area Agreements;
- coordinate the public health concerns in respect of air quality, noise and climate change; and
- contribute to the wider agenda relating to quality of life and reducing health inequalities.

² Statutory Instrument 2004 No. 1663, The Environmental Assessment of Plans and Programmes Regulations 2004

³ Transport Analysis Guidance 2.11 Strategic Environmental Assessment for Transport Plans and Programmes, Department for Transport, ‘In Draft’ Guidance (2009)

2. Overview of the SEA Process – Role of the SEA in developing the LTP3

2.1 Scoping Stage

The SEA started as the preparation of the LTP3 began and it has progressed concurrently in an iterative manner in order to feed back environmental and sustainability objectives and policies into the plan making process. The SEA has been used as a tool for improving the LTP3 formulation process from inception through production to adoption of the solutions included in the LTP3.

Initially, work undertaken for the Scoping Report in establishing the environmental baseline and identifying key environmental and social, including health, issues in the Derby area identified opportunities and relevant environmental themes. This had implications for the development of the LTP3 and played a key role in developing a framework set of objectives known as the SEA framework.

2.2 Compatibility assessment between SEA Objectives and LTP3 Challenges

At the initial stages of developing the Draft LTP3 an analysis was undertaken to identify to what extent the Draft LTP3 objectives were compatible with the SEA objectives contained in the SEA framework. This is detailed in Section 9 of the Final Environmental Report. The Draft LTP3 objectives were generally compatible with the SEA objectives with the exception of LTP3 Challenge 2 for which many potential conflicts were identified. There were a number of instances where compatibility was deemed to be dependent on implementation and therefore could not be ascertained with certainty at this stage. In addition, SEA objective 11 covering energy efficiency and increased use of renewable energy was not appropriately covered by the proposed set of LTP3 Challenges.

A number of recommendations regarding the wording of some LTP3 Challenges were made to improve the potential for more sustainable implementation of the Challenges.

These recommendations have been considered by the Council which resulted in some LTP3 Challenges being retained, others modified, two merged and one new Challenge on minimising transport's contribution to climate change and improving energy efficiency added.

In addition, the other main outcome of this process was that the council will provide some more description and examples underneath each LTP3 Challenge for clarification.

2.3 Consideration of Strategic alternatives

The SEA played a key role in identifying the reasonable alternatives considered in the development of the Final LTP3. Section 10 of the Final Environmental Report considers the analysis of alternatives, and should be read in conjunction with this SEA Statement.

In developing the Draft LTP3, five strategic alternatives were considered, the results of which are summarised below:

1. **Strategic alternative 1** - Significant support for network management and asset management and a minimum of level of support for active travel and public transport;
2. **Strategic alternative 2** - Significant support for active travel and public transport, moderate support for network management and a minimum level of support for maintenance;

3. **Strategic alternative 3** - Significant support for active travel with moderate support for network management and asset management but a minimum level of support for public transport;
4. **Strategic alternative 4** – Either maintaining or improving on services or standards across all areas;
5. **Strategic alternative 5** – Delivering an achievable minimum across all areas.

Each strategic alternative comprises a combination of measures split into four themes:

- Active travel;
- Public transport;
- Network management;
- Asset management.

Each alternative has a different level of emphasis on each theme ranging from Low to Medium and High. For example, strategic alternative 2 comprises:

- Active travel – High level of support (which includes all Low and Medium measures plus additional measures);
- Public transport – High level of support (which includes all Low and Medium measures plus additional measures);
- Network management – Medium level of support (which includes all Low measures plus additional measures);
- Asset management – Low level of support.

The different levels of support are defined broadly as follows:

- High – Representing delivering significant improvements to services, or providing new facilities;
- Medium – Representing either maintaining or improving on services or standards;
- Low – Representing maintaining the current level of support, either to existing levels, or to some achievable minimum. This level of support is also known as 'Do Minimum';
- Do Nothing – Representing a scaling back from services or standards currently provided.

Strategic alternative 5 represents a Low level of support for all themes. It is also important to note that the Low level of support is not synonymous with Do Nothing.

The five strategic alternatives were tested against the SEA objectives.

The assessment showed that:

- Strategic alternative 1 is the least environmentally favourable alternative given its significant adverse effects for air quality, biodiversity and natural environment, land contamination and soil quality and resources and natural resources and waste. In a few social objectives, small positive benefits are likely to arise but so too are further minor negative environmental effects.
- Strategic alternative 2 has the highest number of beneficial significant effects (7 in total), relating mostly to social objectives but also against objectives for air quality and greenhouse gases. Significant negative effects are nevertheless expected against land contamination and soil quality and vulnerability to climate change and flooding due to the location of the park and ride sites.
- Strategic alternative 3 has significant beneficial effects for air quality, greenhouse gases, road safety and traffic and congestion. The strategic alternative has fewer beneficial significant

effects on the social side than strategic alternative 2 but no significant adverse environmental effects.

- Strategic alternative 4 mostly comprises of minor beneficial positive and negative effects, with significant negative effects for natural resources and waste and significant beneficial effects for traffic and congestion
- Strategic alternative 5 has most neutral or no effects given the lack of interventions in this scenario. There are minor negative effects against air quality and greenhouse gases.

Alternative 3 can therefore be considered the most sustainable overall as it does not exhibit any significant negative effects. However, alternative 2 delivers a higher number of positive social significant effects and performs well in this respect. It was recommended that these social effects be achieved as part of the preferred strategy.

Table 2.1 - Assessment Summary for the strategic alternatives

SEA Objectives	Strategic alternatives				
	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Environmental					
1	--	++	++	+	-
2	-	++	++	+	-
3	--	-	-	-	0
4	-	0	0	0	0
5	-	0	0	0	0
6	0	+	+	0	0
7	--	--	-	-	0
8	-	-	-	-	0
9	-	--	-	-	0
10	--	-	-	--	0
11	0	+	0	0	0
Social Including Health Specific					
12	-	+	0	0	0
13	-	++	+	+	0
14	0	++	+	+	0
15	+	++	++	+	0
16	+	++	+	+	+
17	+	++	++	++	0

Scale of Effect:

+++ Large beneficial ++ Moderate beneficial + Slight beneficial
 0 Neutral or no effects --- Large adverse -- Moderate adverse - Slight adverse

Those effects which are either moderate or major are deemed to be significant

SEA Objectives

Environmental

1. To protect and enhance local air quality, in particular in Air Quality Management Areas
2. To minimise the emissions of greenhouse gases from transport
3. To protect and enhance biodiversity, the natural environment and green infrastructure
4. To conserve and enhance the buildings, sites and features of cultural interest and their settings
5. To protect and enhance landscape and townscape character
6. To protect, enhance, and promote the enjoyment of open spaces
7. To prevent land contamination associated with transport and seek to conserve soil quality and resources
8. To protect and enhance the water environment
9. To reduce vulnerability to climate change by minimising the impact of flooding and effects from other adverse weather conditions
10. To manage and conserve natural resources and minimise the production of waste
11. To increase energy efficiency and increase the use of renewable energy

Social Including Health Specific

12. To reduce noise and vibration and light pollution related to transport
13. To protect and improve the health of Derby's population and reduce health inequalities between areas and groups
14. To reduce crime and fear of crime and promote safer and more cohesive communities
15. To improve road safety and reduce number of transport incidents
16. To improve accessibility to employment opportunities, key facilities and services
17. To reduce traffic and congestion

2.4 Assessment of Draft LTP3 preferred strategy

Following on from the assessment of strategic options, a draft preferred strategy for the LTP3 was developed. This was based on strategic alternative 4. The Council believes this represents the most balanced approach through investment in maintenance and delivering in the key areas of land use policies, active travel, public transport, network management and asset management. The Council proposes a balanced long term transport strategy underpinned by making best use of the existing transport asset. The Council will achieve this through investment in maintenance, whilst continuing to invest in other areas such as measures to improve and encourage walking and cycling.

The LTP has been developed in a period of increasingly limited and restricted funding. With uncertainty around the level of future funding, Derby thus created two test scenarios. The first was an Aspirational scenario and the second was a Most Likely funding scenario. The differences between the two scenarios are represented by the range of measures in each.

The Aspirational funding and Most Likely funding scenarios can best be represented as strategic alternative 4 with additional measures.

In addition, two sensitivity tests were applied which involve excluding two major projects from the Aspirational scenario: the at-grade separation of the A38 (in other words, assuming it will not be grade separated by the Highways Agency) and the continued opening of London Road rail bridge (in other words, assuming it will be closed).

2.5 Assessment of Draft LTP3 implementation plan

The implementation plan covers the period 2011-2013. It reflects the funding realities that Derby will face in the next few years and is therefore more limited in the amount of measures proposed compared with the long term strategy which covers a larger time span (2011-2026).

The environmental effects of the draft implementation plan were deemed to reflect more closely the Most Likely funding scenario than the Aspirational funding scenario given the more limited range of interventions it includes.

2.6 Assessment results

The Draft LTP3 preferred strategy and implementation plan were assessed against the SEA framework. The assessment summary is shown in Table 2.2.

Table 2.2 - Assessment summary for the preferred scenarios

SEA Objectives	Scenarios			
	Aspirational scenario	Most Likely funding scenario	Aspirational scenario – excluding A38 grade separation	Aspirational scenario – excluding London Road rail bridge
Environmental				
1	-	-	-	-
2	-	-	-	-
3	--	-	-	-
4	--	--	0	--
5	--	--	-	--
6	-	0	-	-
7	--	-	--	--
8	-	-	-	-
9	-	-	-	-
10	--	-	--	--
11	+	+	+	+
Social Including Health Specific				
12	-	-	0	0
13	+	+	+	0
14	+	+	+	+
15	+	+	+	+
16	+	+	+	+
17	++	++	++	++

18	+	+	+	+
TOTAL	-8	-4	-3	-7
Total Sig +	1	1	1	1
Total Sig -	5	2	2	4
Total number of positives	7	7	7	6
Total number of negatives	11	10	9	10

Scale / significance of effect:

+++ Large beneficial ++ Moderate beneficial + Slight beneficial
 0 Neutral or no effects --- Large adverse -- Moderate adverse - Slight adverse

Those effects which are either moderate or major are deemed to be significant

SEA Objectives

Environmental

1. To protect and enhance local air quality, in particular in Air Quality Management Areas
2. To minimise the emissions of greenhouse gases from transport
3. To protect and enhance biodiversity, the natural environment and green infrastructure
4. To conserve and enhance the buildings, sites and features of cultural interest and their settings
5. To protect and enhance landscape and townscape character
6. To protect, enhance, and promote the enjoyment of open spaces
7. To prevent land contamination associated with transport and seek to conserve soil quality and resources
8. To protect and enhance the water environment
9. To reduce vulnerability to climate change by minimising the impact of flooding and effects from other adverse weather conditions
10. To manage and conserve natural resources and minimise the production of waste
11. To increase energy efficiency and increase the use of renewable energy

Social Including Health Specific

12. To reduce noise and vibration and light pollution related to transport
13. To protect and improve the health of Derby's population and reduce health inequalities between areas and groups
14. To reduce crime and fear of crime and promote safer and more cohesive communities
15. To improve road safety and reduce number of transport incidents
16. To improve accessibility to employment opportunities, key facilities and services
17. To reduce traffic and congestion
18. To improve journey ambience

Overall, it has been shown that the greater the level of intervention in the form of the construction of transport infrastructure such as park and rides and road schemes such as the A38 grade separation, the greater the extent of beneficial and adverse environmental effects. Although some are significant, mitigation and enhancement can be used to improve the performance of these scenarios. The decision on which scenarios to pursue in LTP3 depended on the balance given to social and environmental considerations, and, importantly, on the prevailing funding situation which determines as much the level of intervention LTP3 can make.

As a result of the assessment, the Draft Environmental Report made a series of recommendations that aimed to improve the overall sustainability performance of the Draft LTP3. Table 2.3 lists the recommendations contained within the Draft Environmental Report and how these have been considered and/or incorporated into the Final LTP3.

The recommendations have been split into three categories:

- Mitigation of significant environmental effects;
- General mitigation measures – mitigation and enhancement measures provided for effects that were not deemed to be significant; and
- Additional transport solutions – these cover a range of additional transport solutions in addition to the suggested environmental mitigation measures.

Table 2.3 - Consideration of the recommendations in the Draft Environmental Report

Recommendation of the Environmental Report	How the recommendation is reflected in the Final LTP3
Mitigation of significant environmental effects	
<p>Further attention should be given to the location, construction and operation of the park and ride sites. This will help determine if there are any alternative locations which avoid adverse biodiversity impacts and use of greenfield and contaminated land.</p>	<ul style="list-style-type: none"> Derby City Council hopes to undertake a detailed study of appropriate number, location, size and operating conditions of park and ride across the city. It is not possible to resource this study in the short term, however when it is prepared it will give full consideration to these issues, and any environmental (including biodiversity, landscape and townscape impacts) that could arise from park and ride. Mitigation measures for these impacts will be included in the study, and in detailed Environmental Impact Assessment of individual sites coming forward. Funding for Park and Ride would be provided through development, and linked to development schemes, which have not as yet come forward. Detailed analysis of the environmental impact of any future park and ride sites will be undertaken as proposals come forward. This policy of support, and the conditions under which future park and ride will be developed, are explained in LTP3.
<p>Another form of avoidance is deciding to implement only a few rather than all of the park and ride schemes proposed.</p>	
<p>If this is not possible, then the footprint of the development should be limited wherever possible. More detailed measures should be explored at the project planning stage including: habitat compensation spaces and the use of tree planting to create a barrier between habitats and species and the park and ride schemes.</p>	
<p>Compensation should be provided to offset any loss of agricultural land through the provision of alternative land.</p>	<ul style="list-style-type: none"> There are few agricultural Greenfield sites within Derby that could come forward for development in the future. Development sites should be allocated within the Local Development Framework, and proposals will be subject to further assessment, in some cases EIA. Compensation or mitigation will be specified in such assessments and EIA.
<p>In order to avoid natural resource use and wastage, there should be greater focus on using intelligent technologies and measures such as expanding the ITS (Intelligent Transport Systems) network.</p>	<ul style="list-style-type: none"> LTP3 emphasises the advantages of effective network management to increase the efficiency of traffic flows within the city, which will reduce resource consumption. Network management, which includes ITS, is given high priority for the allocation of funds in the implementation plan. In the long term, a balanced transport strategy will ensure all improvements to ITS will be supported by adequate road maintenance, active travel and public transport measures that will reduce congestion and increase mode choice and safety. Optimising efficiency of traffic flows will only work to reduce resource use if measures to increase the choice of lower-resource intensive modes are included in the plan.

Recommendation of the Environmental Report	How the recommendation is reflected in the Final LTP3
<p>For the same purpose, developments should adhere to a Construction Environmental Management Plan (CEMP) during construction incorporating the requirements for Site Waste Management Plans (SWMPs). Opportunities should be sought to identify and reuse materials on site and give preference to locally sourced materials to reduce transport requirements.</p>	<ul style="list-style-type: none"> • Developments subject to further environmental assessment and/or EIA will incorporate environmental impact mitigation requirements, both on development proposals, and during construction. This will include measures that follow the hierarchy of reduce, reuse, recycle for waste and materials. LTP3 describes the impacts of construction activities on the road network, and the desirability of reducing the amount of freight traffic accessing the city centre.
<p>For some of the major schemes such as the Highways Agency A38 grade separation and park and rides, further exploration, assessment and mitigation may be required in the form of an Environmental Statement resulting from an Environmental Impact Assessment (EIA).</p>	<ul style="list-style-type: none"> • LTP3 explains that as major schemes come forward they may be subject to EIA, that will identify potential environmental impacts arising from proposals, and specify how these will be mitigated.
<p>General mitigation measures</p>	
<p>Ensuring that any public realm improvements such as new bus shelters and kerbs are designed sensitively to historic assets, townscape and landscape. Use of sympathetically designed sustainable streetscape furniture and materials.</p>	<ul style="list-style-type: none"> • LTP3 refers to the Derby's City Regeneration Framework, that will include public realm design principles. The implementation plan outlines detailed design and impact assessments will be required for development proposals where appropriate.
<p>Ensuring that park and ride schemes are designed as such to avoid landscape impacts in areas of particular sensitivity.</p>	<ul style="list-style-type: none"> • See comments above
<p>Travel plans should improve awareness of open spaces and how to access them using sustainable means of transport. Buses and public transport should make users aware of how open spaces can be accessed.</p>	<ul style="list-style-type: none"> • LTP3 refers to the importance of travel plans and aims to support continued and additional travel planning for businesses, residents and employees in Derby. Access to open space has been considered in an accessibility scoping report prepared as part of the evidence base for LTP3. Accessibility in Derby is generally very good. Specific mention of access to open space will be mentioned in specific Travel Plans as appropriate.
<p>Employing forms of pollution prevention and control for construction and operation including sediment and oil traps.</p>	<ul style="list-style-type: none"> • These measures will be considered for implementation as appropriate, when opportunities to incorporate pollution controls into the highways asset occur.
<p>Considering groundwater protection zones during planning and construction phase.</p>	<ul style="list-style-type: none"> • LTP3 is a strategic document. Reference is made to the need to protect groundwater sources from adverse impacts from transport-related activities. Detailed provision for consideration of these zones during planning and construction will be incorporated into relevant

Recommendation of the Environmental Report	How the recommendation is reflected in the Final LTP3
	environmental assessments and/or EIA.
Employing measures that limit surface run-off and contribute to increased flood risk such as Sustainable Urban Drainage Systems (SUDS).	<ul style="list-style-type: none"> LTP3 refers to the links between SUDS, Green Infrastructure, and the incorporation of cycling and walking routes across the city. Detailed policy respecting SUDS and implementation of these and related schemes will be outlined in the Highways Asset Management Plan, Core Strategy and other design policies and SPG as appropriate.
Pursuing transport measures that directly provide access for local people to open space and recreation opportunities and health facilities, particularly for particularly disadvantaged group and areas.	<ul style="list-style-type: none"> An Equalities Scoping Report was prepared which identifies potentially disadvantaged groups of people and areas of the city with poorer access to all facilities and services in the city, including shopping, employment, open space, recreation and health facilities. LTP3 seeks to ensure a balanced approach to the provision of transport services, including promotion of accessibility.
Pursuing transport measures that directly provide access for local people to key facilities such as health facilities, shopping and employment, particularly for particularly disadvantaged group and areas.	
Ensuring that measures such as CCTV and additional lighting are incorporated where necessary on public transport schemes such as park and rides.	<ul style="list-style-type: none"> These schemes will be considered in specific design schemes, as appropriate supporting developments such as park and ride come forward.
Noise mitigation may need to be considered where the noise increases in the long-term are 3dB or greater. Potential noise mitigation measures could include the use of alternative quieter road surfaces and roadside noise barriers.	<ul style="list-style-type: none"> LTP3 refers to Noise Action Plans that are currently being prepared by the Department for the Environment Food and Rural Affairs. Areas of potentially harmful noise levels adjacent to the A52 and A38 within Derby will be subject to noise mitigation action plans, to be provided by the Department.
Additional transport solutions	
Old vehicle scrapping - Encourage continuation and increased adoption of old vehicle scrapping schemes to take the most pollution vehicles off the network.	Derby City Council has no plans to implement scrapping schemes beyond the national scheme run in 2009-10. LTP3 makes no mention of car scrapping schemes.
Low emission buses – Support further integration of low emission buses into existing fleets.	LTP3 makes mention of the continued partnership working between the Council and bus operating companies. Several buses in Derby are operated on low emission fuels. LTP3 explains that as fuel and vehicle technology evolve over the LTP3 period, emissions from all vehicles will decline. This will be influenced by international markets and national legislation and incentives. LTP3 is unlikely to support low emission buses in the foreseeable future due to funding constraints.
Bus Stop Improvements – Time savings at bus stops by investing to	LTP3 shows how we expect to continue to invest in bus stop

Recommendation of the Environmental Report	How the recommendation is reflected in the Final LTP3
reduce bus dwell time, including raised kerbs at all stops, and also changes to ticketing practice whereby passengers would buy a ticket before boarding.	improvements and evolve ticketing over the short and long term.
Passenger Security – Personal security at bus stops and on walk routes to and from bus stops.	LTP3 relates to this recommendation through Goal 3, which aims to contribute to better safety, security and health for all people in Derby by improving road safety, improving security on transport networks and promoting active travel. LTP3 shows how we intend to improve public safety and security through the rolling out of the PFI Lighting Street Lighting Programme and increasing natural surveillance and visibility for all transport modes through design. Personal safety in the city centre will also be addressed through the City Regeneration Framework which is referenced in LTP3.
Promote freight quality partnerships.	The Derby and Derbyshire freight quality partnership will be pursued as appropriate. LTP3 describes the freight partnership and Derbyshire freight access maps which aim to minimise disruption from freight vehicles in the city centre.
Review loading and unloading arrangements in town and city centre.	
Alternative fuels – Explore alternative fuel for freight movements, identify locations for electric charging points and promote availability of electric vehicles.	LTP3 describes recent funding opportunities to install electric vehicle charging points in the city as part of a West Midlands consortium. This scheme will be pursued as appropriate in the city.
Electric Vehicle (EV) reserved parking – Allocated parking spaces for electric vehicles where charging connections are provided.	
Lower speed limits – Lower speed limits on main roads and 20mph limits on urban roads.	The impact of reducing speed limits on Derby's roads was tested during the preparation of LTP3. The results of this testing are described in LTP3, and in the background papers describing the modelling work and results in detail.
Controlled Parking Zone (CPZ) at parking congestion area – Implement Controlled Parking Zones at high parking congestion locations including around Hospitals and Schools.	The parking strategy is referred to in LTP3. The parking strategy will outline Derby's parking policy, and the impact of schemes such as CPZ, cycle and motorcycle parking, parking charges and the strategy for multi-storey car parks. This detailed policy is not provided in the LTP3 as it is a strategic document.
Cycle parking in all car parks and park and ride	
Motorcycle and scooter parking in all car parks	
Public Transport loyalty schemes – Bus/Train service 'loyalty schemes' to reduce cost if frequently used (subsidies/loans for season tickets provided	LTP3 describes how we will continue to work in partnership with bus and train operating companies. Any changes to operating or ticketing will be discussed with the service providers. Advance ticketing arrangements will

Recommendation of the Environmental Report	How the recommendation is reflected in the Final LTP3
by operators or other organisations).	require officer time, and the promotion of these schemes will depend on the resources available in the future.
Education Travel Plans – School, Further and Higher Education travel plans.	Derby City Council continues to support travel planning at schools and businesses across the city. LTP3 describes how we will continue to fund these schemes, and the measures contained in travel plans such as cycle training and car clubs, with the support of such funding streams as the Local Sustainable Transport Fund.
Review/Monitor Travel Plans – Review/Monitoring of current Travel Plans through the development of Travel Plan guidance	
Cycle Training/Education at Workplaces.	
Travel Plan Awards	
Travel Plan Best Practice information – Travel Plan Good/Best Practice Meetings/Seminars for workplaces and schools and so on	
Promotion/support of flexible working practices – campaign to promote flexible working practices amongst employers	
Promotion of car clubs and car sharing	LTP3 describes the potential for car clubs in Derby. The Council will support car clubs within the city, although funding constraints will mean financial support will not be possible in the foreseeable future, unless external funding is secured through bids, or working in partnership with neighbouring transport authorities.
Walking cycling maps – Walking/Cycling distance maps with "you are here" and indicative journey time inscribed circle (15 minutes) also showing calorie expenditure for inscribed circle. Maps will also show cycle parking locations.	Walking/Cycling maps have been produced by the council to indicate walk and cycle times to schools in the city. LTP3 does not mention these maps as schemes at this level of detail are described in the Smarter Modes Of Travel Strategy.
Cycle audits on routes – Cycle audits to review of lighting and surface quality, amongst others, on all current cycle paths.	The Cycling Strategy is in preparation and is referred to in LTP3. The Cycling Strategy will outline the detailed policies and schemes that Derby will aim to put in place in the future, and will consider the viability and appropriate level of provision of the types of schemes listed here.
Cycle capacity on public transport – Expand capacity for cycles across the public transport network to increase the effective range of cycles.	
City centre cycling hubs – City centre cycling hubs to provide storage facilities, showers and maintenance areas to support increased cycle usage.	
Active travel towns – Establishing Active Travel Towns with Sustrans.	It is not proposed for Derby City to become a Sustrans Active Travel Town. This (or similar schemes) may be put forward or addressed through

Recommendation of the Environmental Report	How the recommendation is reflected in the Final LTP3
	the Local Sustainable Transport Fund bid.
Home Zones – Support the establishment of more home zones across the area to create neighbourhoods designed for active travel modes.	It is not proposed to include provision of home zones in LTP3. Home zones were proposed in LTP2, but have not secured the local or political support to be carried forward in the future.
Improved signage – distances given	Improvements to signage across the city will be carried forward in the future through the Network Management Duty, as described in the Network Management Plan. However schemes at this level of detail are not described specifically the LTP3.

The Council has given careful consideration to the recommendations set out above. Generally, the Council demonstrated that LTP3 already provides broad coverage of a number of SEA recommendations. In relation to other, more specific, recommendations it has been confirmed that they will be taken on board during the preparation of lower tier specific transport policy documents and schemes as they come forward.

The final version of LTP3 has been reviewed to establish whether the updated document would require any changes to be made to the earlier assessment of the Draft LTP3. It has been established that generally the final LTP3 follows the Most Likely funding scenario, and that both its components, the long term strategy and the implementation plan, do not introduce any fundamentally new interventions. Therefore, the review has concluded that the environmental and social performance of LTP3 mirrors that of the ‘most likely funding scenario’ assessed earlier, apart from an improved performance against SEA objective 5 (landscape and townscape) from moderate negative effects (‘--’) to minor negative effects (‘-’). This is due to the inclusion of the initiatives on urban design and implementation of regeneration, public realm and environmental improvements in the final implementation plan. The rest of the SEA scoring and the justifications for these are deemed to remain valid. Table 2.4 below indicates the assessment score of the final LTP3’s performance in relation to the SEA objectives.

Table 2.4 - Assessment Summary for the Final LTP3

No	SEA Objectives	Final LTP3 (Long Term Strategy and Implementation Plan)
1.	To protect and enhance local air quality, in particular in Air Quality Management Areas	-
2.	To minimise the emissions of greenhouse gases from transport	-
3.	To protect and enhance biodiversity, the natural environment and green infrastructure	-
4.	To conserve and enhance the buildings, sites and features of cultural interest and their settings	--
5.	To protect and enhance landscape and townscape character	-
6.	To protect, enhance, and promote the enjoyment of open spaces	0
7.	To prevent land contamination associated with transport and seek to conserve soil quality and resources	-
8.	To protect and enhance the water environment	-
9.	To reduce vulnerability to climate change by minimising the impact of flooding and effects from other adverse weather conditions	-
10.	To manage and conserve natural resources and minimise the production of waste	-
11.	To increase energy efficiency and increase the use of renewable energy	+
12.	To reduce noise and vibration and light pollution related to transport	-
13.	To protect and improve the health of Derby’s population and reduce health inequalities between areas and groups	+
14.	To reduce crime and fear of crime and promote safer and more cohesive communities	+
15.	To improve road safety and reduce number of transport incidents	+
16.	To improve accessibility to employment opportunities, key facilities and services	+
17.	To reduce traffic and congestion	++
18.	To improve journey ambience	+
<p>Scale of Effect:</p> <p>+++ Large beneficial ++ Moderate beneficial + Slight beneficial 0 Neutral or no effects --- Large adverse -- Moderate adverse - Slight adverse</p> <p>Those effects which are either moderate or major are deemed to be significant</p>		

3. Consultation in the SEA process (incorporating HIA)

Two consultation periods are required by the SEA Regulations. The first, for the Scoping Report, involves consulting the statutory consultation authorities comprising the Environment Agency, Natural England and English Heritage. The second, for the Draft Environmental Report, involves consulting those same organisations and the wider public. Further information is provided below:

3.1.1 Scoping Report

The Scoping Report was the subject of consultation between March and April 2010. The report detailed:

- The plans, policies and programmes relevant to the LTP3.
- Environmental, social and health baseline information.
- The key environmental, social and health issues and problems facing the area.
- A framework of objectives and indicators based on the tasks above, to be used in the SEA assessment process (“The SEA Framework”).

Comments were received from the Environment Agency, Natural England, English Heritage, Primary Care Trust (PCT) and the Council’s LTP Steering Group. Appendix A summarises the main consultees’ comments on the Scoping Report and indicates how these comments were addressed in the preparation of the Draft LTP3 and Draft Environmental Report.

3.1.2 Environmental Report

Two versions of the Environmental Report have been prepared, as follows:

- Draft Environmental Report – published alongside the Draft LTP3 for public consultation; and
- Final Environmental Report – published alongside the Final LTP3 taking account of the Draft Environmental Report consultation responses.

The Draft Environmental Report and Draft LTP3 were the subject of public consultation from 8 November 2010 until 7 January 2011. The Draft Environmental Report, which included the information contained in the Scoping Report, indicated how the Scoping Report consultation responses were considered, presented the assessment of effects of the LTP3 strategic alternatives and of the LTP3 preferred strategy, proposed mitigation measures and recommendations to improve the environmental performance of the LTP3 and proposed a monitoring programme for the significant effects identified by the SEA. Comments were received from the Environment Agency, Natural England, English Heritage, NHS Derby City and one member of the public. Appendix B summarises the main consultees’ comments on the Draft Environmental Report and indicates how these comments have been addressed in the preparation of the Final LTP3 and Final Environmental Report.

4. Monitoring requirements

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)) (Stage E).

SEA monitoring involves measuring indicators which will enable the establishment of a causal link between the implementation of the plan and the likely significant effect (beneficial or adverse) being monitored. It can be used to answer questions such as:

- 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 adverse effects? Are these within acceptable limits, or is remedial action required?

A preliminary monitoring programme was proposed in the Draft Environmental Report. Following consultation on the Draft Environmental Report, the programme has been reviewed in the Final Environmental Report.

Table 4.1 contains the monitoring programme for the Final LTP3 for those effects deemed to be significant. This includes significant cumulative adverse effects in combination with other plans. It has been considered that monitoring of individual schemes/ proposals would be addressed at a project level hence the monitoring programme concentrates on the overall effects of the LTP3 on a given objective rather than on a specific scheme/ proposal. In addition, the proposed programme does not address the location where such monitoring would take place as this aspect will need to be analysed in the further development of the monitoring programme.

Table 4.1 outlines indicators to be used, the current source of monitoring data and frequency of monitoring (if currently collected), the suggested frequency of review of analysis of monitoring data, the Body responsible for undertaking the monitoring, the timing of when remedial actions should be considered and suggestions for what remedial action could be taken.

The guidance suggests that SEA monitoring and reporting activities can be integrated into the regular planning cycle. SEA monitoring should form part of the wider monitoring arrangements for LTP3.

Table 4.1 – Monitoring programme

Effect to be monitored	Indicator(s) to be used	Current source of monitoring data and frequency of monitoring	Suggested frequency of review/analysis of monitoring data	Responsibility for undertaking monitoring	When should remedial action be considered?	What remedial action could be taken?
To protect and enhance local air quality, in particular in AQMAs	Levels of main air pollutants	DCC (local air quality management reports) Annually	Annually	DCC	When objectives for air pollutants in the National Air Quality Strategy are not likely to be met	Further promotion of more sustainable modes of transport, investment in sustainable transport, reducing the need to travel, increasing rail freight over road freight and increasing best practice driving. Further promotion and increase of smarter choices initiatives.
	Air Quality pollutant concentration within AQMAs - emissions and/or vehicle flows (sourced from LTP2 monitoring)	DCC (local air quality management reports) Annually	Annually	DCC		
	Extent of AQMA.	DCC (local air quality management reports) Annually	Annually	DCC	When the number and extent of AQMAs are increasing	Further expansion and upgrade of Intelligent Transport Systems and Network Management measures. Other measures as outlined in Derby's Air Quality Action Plan.
To minimise the emissions of greenhouse gases from transport	Per capita CO ₂ emissions for transport sector (tonnes per year)	DCC/DEFRA, Annually	Annually	DCC/ Defra	When CO ₂ emissions from transport show a growing trend	As above plus further measures to promote vehicles' energy efficiency and shift to less polluting alternative fuels and technologies
To conserve and enhance the buildings, sites and features of cultural interest and their settings	Area of transport schemes within 50m of a Conservation Area and other Heritage at Risk (HAR) site	DCC, English Heritage Annually	Annually	DCC, English Heritage	When data show that transport schemes are likely to affect the quality of the Conservation Areas or other HAR site	Further promotion of careful development of transport infrastructure, using sympathetic high quality design, in and around the areas of cultural and designated and non-designated historic assets in order to maintain their character and appearance. Consultation with English Heritage when development is to take place near a sensitive historic area.
To reduce noise and vibration and light pollution related to transport	Number of noise complaints received relating to transport activities	DCC Annually	Annually	DCC	When data show an increasing number of noise complaints in relation to transport; and an increasing number of people and properties in noisy areas as identified in the Noise Action Plan.	Further promotion of noise attenuation measures and measures to reduce vibration levels and excessive lighting. Other measures outlined in Derby's Noise Action Plan.
	Proportion of street lamps with downward beam.	DCC Annually	Annually	DCC		

Effect to be monitored	Indicator(s) to be used	Current source of monitoring data and frequency of monitoring	Suggested frequency of review/analysis of monitoring data	Responsibility for undertaking monitoring	When should remedial action be considered?	What remedial action could be taken?
To reduce road traffic and congestion	Number of bus passenger journeys	DCC Annually	Annually	DCC	When data show an increase in congestion levels	Increased accessibility by more sustainable modes of transport to key services, facilities, employment areas, green areas and recreational areas. Improved frequency and reliability of buses. Increased number and quality of bus stops.
	Traffic speeds during the AM peak	DCC Annually	Annually	DCC		

Appendix A - Scoping Report Consultation Comments

(To be read in conjunction with the Derby Final LTP3: Strategic Environmental Assessment Final
Environmental Report to which all references apply)

Table A.1 – Consultees’ Comments on the Scoping Report

Name of consultee	Subject and Paragraph No in Response	Summary of Comments	How the comment was dealt with in the Draft and Final Environmental Report
Environment Agency	Chapter 6 – SEA Framework, Table 6.1	We particularly welcome the indicator measuring the % of transport schemes incorporating Sustainable Drainage Systems, due to the multiple environmental benefits they can deliver.	Noted. No action required.
	Appendix A – Policies, Plans and Programme Review	The Floods and Water Management Bill 2010 and the Land Drainage Act 1991 should be included under the National Policies section in Appendix A. The key themes relevant to the SEA should be identified in the second part of Appendix A.	PPPs have been added and key theme(s) identified as per request.
	Chapter 5 – Key Environmental Issues, Table 5.1, Key issue 7 (Increased risk of flooding)	Key issue 7 which discusses the increased risk of flooding, should use Derby’s SFRA to assess the risk from all sources of flooding, including flooding from surface water. It would appear that only river flooding has been examined at the moment.	Reference to the risk of flooding from all sources, including flooding from surface water has been included as per request.
		Any transport infrastructure that is classed as essential infrastructure, as determined by Derby City Council, will need to be designed so that it will remain operational during a flood event.	Reference to the design of transport infrastructure classed as essential so that it will remain operational during a flood event has been included as an opportunity for LTP3.
English Heritage	Appendix A – Policies, Plans and Programme Review	<ul style="list-style-type: none"> • PPS 5 replaces PPGs 15 and 16 • The ‘The Historic Environment: A Force for Our Future’ was replaced by ‘The Government’s Statement on the Historic Environment for England 2010’ • The Derwent Valley Mills World Heritage Site Management Plan was updated in 2007. 	The out of date documents have been replaced with the updated one as per comment.
	Chapter 4 – Baseline Information, Para 4.4	In the light of the new emphasis given in PPS 5 to the conservation of locally significant heritage assets, paragraph 4.4. should include: <ul style="list-style-type: none"> • Locally listed heritage assets • Historic characterisation studies, which would include Historic Landscape Characterisation and Conservation Area Appraisals. 	Baseline information on locally listed heritage assets and historic characterisation studies has been included as per request.
	Chapter 5 – Key Environmental Issues, Table 5.1, Key issue 2 (Pressure on the local historic environment)	Schemes could also affect archaeological resources and the setting of heritage assets.	Added as per request.
		Heritage assets can also be adversely affected by vibration, where it affects historic areas and buildings and other structures; they can also be affected by air pollution, which causes erosion of stonework and so on	Added as per request
	Chapter 5 – Key Environmental Issues, Table 5.1, Key issue 3 (Pressure on Derby’s landscape and townscape character)	In assessing impacts on landscape and townscape character, there is a need to demonstrate an appreciation of what defines the character of places, utilising characterisation techniques, where necessary, to understand the evolution and current	Noted. This will be taken into account whilst undertaking the assessment against the relevant SEA objectives (Stage B of the SEA process).

Name of consultee	Subject and Paragraph No in Response	Summary of Comments	How the comment was dealt with in the Draft and Final Environmental Report
		form of any given area (more information at www.englishheritage.org.uk/characterisation). As well as the impact of major transport infrastructure, the character of an area can be affected by unsympathetic traffic management measures, signage and so on	More detail on Landscape Character Areas within and directly surrounding Derby City has been included in the baseline information. Reference to the effect of unsympathetic traffic management measures, signage, and so on in the character of an area have been added and is now part of Key Issue 3.
	Chapter 5 – Key Environmental Issues, Table 5.1, Key issue 5 (Poor air quality)	In highlighting areas most likely to be affected by poor air quality or be vulnerable to local changes in air quality, it may be possible to identify where this problem is already experienced or where it could be problem in the future.	No action. AQMAs are designated areas where poor air quality is already an issue. The Council monitors the situation by undertaking regular reviews and assessments of air quality in the area. The SEA Scoping Report takes into account the information provided in the latest Updating and Screening Assessment Report 2006.
	Chapter 6 – SEA Framework, Table 6.1, Objective 4 (To conserve and protect the buildings, sites and features of archaeological, historical or architectural interest and their settings)	<p>In order to recognise the potential for enhancement and to reflect the language of PPS 5, it is recommended that Objective 4 Historic Environment is amended to: 'To conserve and enhance the buildings, sites and features of archaeological, historic or architectural and artistic interest and their settings.'</p> <p>We also recommend that the first indicator is replaced by 'Heritage at Risk' (HAR) to reflect the widened scope of the national register, which replaced the Buildings at Risk register in 2008.</p> <p>It is not clear on how the number of Registered Parks and Gardens and Archaeological Alert Areas provide effective monitoring indicators.</p> <p>It is suggested that the reference to registered parks and gardens is deleted (adverse impacts may be picked up through the HAR register).</p> <p>The HAR includes conservation areas at risk, but may not set out the detailed reasons for it being placed as 'at risk'. I suggest that you speak to your heritage team about</p>	<p>Noted and Objective 4 has been amended as per request.</p> <p>Noted and the indicator 'Number of listed buildings and proportion considered to be at risk' has been amended to reflect the widened scope of the national register. This will now cover Listed Buildings, Registered Parks and Gardens, Scheduled Monuments, Battlefields and Shipwrecks as well as Conservation Areas known to be at risk.</p> <p>Comment noted. The indicator on Registered Parks and Gardens has been superseded by the indicator on Heritage at Risk which covers these assets. The indicator on Archaeological Alert Areas has been amended as follows to allow for more accurate reflection of potential LTP3 effects:</p> <ul style="list-style-type: none"> • % of transport schemes planning applications with archaeological site appraisals completed as a result of Archaeological Alert Areas' requirement. <p>Noted and agreed. This indicator has been superseded as per the comment and response above.</p> <p>Noted. The Council will discuss with Heritage officers whether the inclusion of the additional indicators is necessary in this respect.</p>

Name of consultee	Subject and Paragraph No in Response	Summary of Comments	How the comment was dealt with in the Draft and Final Environmental Report
		appropriate indicators. It is suggested that the impacts on Archaeological Alert Areas should be monitored.	Noted and it is now addressed through the proposed amendment to the relevant indicator (see above).
	Chapter 6 – SEA Framework, Table 6.1, Objective 12 (To reduce noise and vibration and light pollution related to transport)	Objective 12 deals with the health impacts of noise and vibration, but it should also be considered with respect to buildings and structures, whether designated or not, and the enjoyment of heritage assets, such as parks (Objective 6). It would be possible to identify the number of designated heritage assets that lie within AQMAs and Noise Action Planning First Priority Locations and see if the number is reduced as a result of the implementation of the LTP.	Comment noted and the following indicators have been added under: <ul style="list-style-type: none"> • SEA Objective 4 (heritage assets): <ul style="list-style-type: none"> - Number of designated heritage assets that lie within AQMAs - Number of designated heritage assets that lie within Noise Action Planning First Priority Locations • SEA Objective 6 (open spaces): <ul style="list-style-type: none"> - Noise levels from major roads adjacent to open spaces • SEA Objective 12 (noise): <ul style="list-style-type: none"> - % of the population living in Noise Action Planning First Priority Locations
	Chapter 6 – SEA Framework, Table 6.1, Objective 5 (To protect and enhance landscape and townscape character)	The same point about the indicators that merely record the number and extent of assets applies, as these indicators do not monitor the impacts on landscape/ townscape character, which may be positive or negative. The indicators need to measure adverse or positive impacts on landscape and townscape character.	Noted and the following indicators have been included in the SEA Framework: <ul style="list-style-type: none"> • % of transport schemes applications refused for reasons due to poor design • % of transport schemes applications that incorporate improvements to public realm and sympathetic design.
	Para 6.3.1 – Predicted future trends, Table 6.2, SEA Objective 4 (Historic environment)	Without appropriate management, increased congestion could also result in more buildings and structures affected by the effects of vibration, noise and air pollution. It could also affect the enjoyment of the historic environment, including parks (Objective 6).	Reference to effect of increased congestion, without appropriate management, on historic buildings and structures have been added as per request.
	Para 6.3.1 – Predicted future trends, Table 6.2, SEA Objective 5 (Landscape and townscape character)	Same comment as above - There is a need to demonstrate an appreciation of what defines the character of places, utilising characterisation techniques, where necessary, to understand the evolution and current form of any given area (more information at www.englishheritage.org.uk/characterisation). As well as the impact of major transport infrastructure, the character of an area can be affected by unsympathetic traffic management measures, signage and so on	Comment noted and has been taken into account in the relevant section of Table 6.2. More detail on Landscape Character Areas within and directly surrounding Derby City has been included in the baseline information
Natural England	Chapter 1 – Introduction, Para	We note your justification for deciding that the nature of the	Updated justification is provided in section on Habitats

Name of consultee	Subject and Paragraph No in Response	Summary of Comments	How the comment was dealt with in the Draft and Final Environmental Report
	1.5 Habitats Regulation Assessment	plan and the scope of its potential impacts has led to the conclusion that detailed HRA is unnecessary. We concur with this view, on the basis that the geographical area covered by LTP3 is limited to Derby city only. We also note the comments in 1.2.1 regarding the need, in due course, for a LTP to cover the wider Derby housing market area (HMA). As this includes South Derbyshire, through the south of which runs the River Mease SAC, we would expect this LTP to include a Habitats Regulation Assessment. We are satisfied, however, due to the reasons given in section 1.5, that HRA is not required for this document. That said, the reasoning provided here lacks detail, depending on how you define distance, there are Natura 2000 sites within 15km of Derby, which could be considered as adjacent in terms of receptors. The justification for not undertaking HRA should focus on the lack of opportunity for the plans or policies contained in the document to impact upon the features of interest of the Natura 2000 sites identified. The reasoning for the decision not to undertake HRA, which presumably would be included in the appendices of the finished SEA, will need to be more robustly explained.	Regulation Assessment in the Environmental Report.
	Chapter 3 – Identifying other Plans and Programmes	We are pleased to note that biodiversity is explicitly mentioned in section 3.3 as one of the environmental sustainability themes of the SEA. This is consistent with the standard methodologies for SEA production. We are pleased to note the fact that non-statutory wildlife sites (including geological sites) have been included, as has BAP habitat and species.	Noted. No action required.
	Chapter 5 – Key Environmental Issues, Table 5.1, Key Issue 1 (Threats to biodiversity and geodiversity)	We cannot comment on whether numbers in part 1 of table 5.1 (except to confirm that the SSSI figures are correct within the administrative city – you will need to consider whether it would be appropriate to include Kedleston Hall SSSI in this SEA as, although it sits outside the administrative boundary, it is sufficiently close for it to possibly be impacted by transport proposals in Derby. It is not our view that this would definitely be the case, but we do think that there needs to be a justification should it not be included.	Reference to Kedleston Park SSSI (located approximately 950 meters away from the north-west boundary of Derby) has been added as per request.
	Chapter 5 – Key Environmental Issues, Table 5.1, Key Issue 3 (Pressure on Derby’s landscape and townscape character)	We note the inclusion of the Green Wedges and the areas of green belt as a consideration in part 3 of table 5.1. This leads to the need to ensure that due consideration is given to any green infrastructure plans that may exist or be in preparation relating to the 6C’s planning for growth. This goes beyond landscape (though of course includes landscape) to	Noted. Reference to Green Infrastructure has been mentioned along relevant Key Issues.

Name of consultee	Subject and Paragraph No in Response	Summary of Comments	How the comment was dealt with in the Draft and Final Environmental Report
		<p>considerations such as biodiversity, access to green space and associated social benefits. It may represent a cross-cutting theme and be covered in various areas of the SEA, though reference to it, especially when considering impacts upon areas of green space, will need to be made.</p>	
		<p>We are pleased to note that townscape impacts have been included here.</p>	<p>Noted. No action required.</p>
	<p>Chapter 6 – SEA Framework, Table 6.1, Objective 3 (To protect and wherever possible enhance biodiversity, in particular designated sites and important habitats and species and explore opportunities for green infrastructure)</p>	<p>Table 6.1 includes the SEA objective indicators. Under biodiversity, it includes the number, area and condition of designated sites. The key identifies that for this indicator, data is only known for Derbyshire and/or the East Midlands. This depends somewhat on the definition of ‘designated sites’. If it is referring to SSSIs, then information on the area and conservation status of SSSIs is available on Natural England’s website. Otherwise we concur with the list of indicators identified here, and note also that Indicator areas 5-10 in table 6.1 also have the potential to measure impacts upon biodiversity, albeit indirectly. Similarly we concur with the commentary under 3 in table 6.1, though explicit mention of the local BAP may be necessary here as a key document in improving biodiversity within the City.</p>	<p>Noted. The indicator is meant to cover not only SSSI but all designated sites, such as Local Nature Reserves and Wildlife Sites and that is why the key indicates that the data is known at the regional level.</p> <p>Reference to BAP has been added as appropriate.</p>
	<p>Chapter 6 – SEA Framework, Table 6.1, Objective 5 (To protect and enhance landscape and townscape character)</p>	<p>We note the indicators proposed for landscape in table 6.1. Clarity is needed here with regard to the definition of ‘designated landscapes’. We assume this is in the context of local landscape characterisation, rather than nationally designated landscapes (which would be largely irrelevant in this location). It might be useful to clarify this.</p>	<p>There are no designated landscapes in the study area and as such the indicator ‘Number/ Area of Designated Landscape’ has been replaced with the following indicator:</p> <ul style="list-style-type: none"> • Changes due to transport effects on the Landscape Character Areas
	<p>Chapter 6 – SEA Framework, Table 6.1</p>	<p>Secondly, we note the inclusion of RoWIPs (Rights of Way Improvement Plans) and % of easily accessible Rights of Way as indicators. We welcome the inclusion of these as important indicators, though we would question whether these are landscape indicators per se. It isn’t clear where better they may sit, though they could go in under 17, as other sustainable transport options (cycling, for example) are included here. This is not a matter of concern for us, but it may be questioned.</p>	<p>Comment noted. Indicators on Rights of Ways are included only under SEA Objective 6 (open spaces) to avoid repetition. However it is recognised that they are relevant to a number of other objectives, including 16 (accessibility), 13 (health) and 17 (reduce road traffic and congestion).</p>
	<p>General - Landscape</p>	<p>Natural England agrees with the general approach to landscape and townscape assessment within the SEA scope. The existing Derbyshire Landscape Character assessment document, supported by the recently published regional landscape character assessment should provide a strong and</p>	<p>Noted. The Derbyshire Landscape Character assessment document will be consulted to ensure robustness of the assessment stage (Stage B of the SEA process).</p>

Name of consultee	Subject and Paragraph No in Response	Summary of Comments	How the comment was dealt with in the Draft and Final Environmental Report
		robust evidence base against which impacts of proposals can be assessed.	
	Figure D.2	In figure D. 2, we would recommend liaising with the Local Environmental Records Centre and the Derbyshire Wildlife Trust to ensure that these elements are appropriately mapped. We note that Boulton Moor SSSI is singled out from other Sites of importance for nature conservation – given the separate and differing levels of protection afforded to SINCs and SSSIs, it may be appropriate to separate out Boulton Moor SSSI.	Agree. Figure D.2 has been amended to clearly show Boulton Moor SSSI and other SSSI located in close proximity to the study area.
	General	In conclusion, subject to the comments above, we are satisfied with the scope of the LPT3 SEA for Derby, and believe that the methodology outlined is appropriate and in conformity with NATA and other government guidance relating to LTP and SEA.	Noted with thanks. No action required.
Primary Care Trust (PCT)	General	The PCT would want to see action that increases physical activity / active travel and reduces car travel / pollution. Anecdotally that means making streets safer for kids to play on, shifting to active travel to schools, making green spaces more accessible and so on Not sure how PCT would work with the Council to achieve this though.	Noted. Derby City Council to work closely with PCT to ensure that LTP3 provide for increased physical activity / active travel and reduced car travel / pollution. It is believed that those implications and opportunities for LTP3 have already been outlined in the Key Issues table and should be taken on board in developing LTP3 options.
	Page 36, Table 5.1, Health Specific key issues	Reference should be made to the most deprived neighbourhoods: Arboretum and Normanton.	Reference to Derby's most deprived neighbourhoods (Arboretum and Normanton) has been included under Key Issue 18 (General Health).
	Page 36, Table 5.1, Health Specific and Accessibility key issues	I think we've picked up issues about access to hospital from parts of Arboretum (St Chads), there is certainly an issue about getting across or round Derby for people rather than being forced through the centre.	Reference to this issue has been included as part of Key Issue 16 (Accessibility).
	Page 36, Table 5.1, Key Issue 20 (Physical activity and open space)	I think that the Physical Education and School Sport Club (PESCL) data is not representative of activity levels of kids in Derby, which are actually much lower. It might be worth to speak to the b-active team.	Updated information on activity levels of children in Derby not readily available.
Derby City Council SEA Steering Group	General	It was suggested that the SEA issues move away from environmental issues and become economic. Some issues (for example, jobs, deprivation) are not environmental issues. It was explained that the SEA covers sustainability issues as well as health and environment and that where we had greater depth of information, especially from the Core Strategy SA, we could include it if we believed it to be appropriate. We will need to take care to explain the differences and similarities	It is believed that the explanation of the differences and similarities between an SEA and an SA is not necessary, as it is only SEA that is required for LTPs under the European Directive 2001/42/EC. Such issues as jobs and deprivation are covered under the social considerations. It is recognised that they have links with the economic issues but the focus from the

Name of consultee	Subject and Paragraph No in Response	Summary of Comments	How the comment was dealt with in the Draft and Final Environmental Report
		<p>between an SEA and a Sustainability Appraisal as we go through the process. The benefits of doing a full sustainability appraisal were discussed however GOEM advised that this would not be necessary and that the SEA should suffice.</p>	<p>SEA perspective is on social and environmental issues.</p>
	<p>Chapter 5 – Key Environmental Issues, Table 5.1</p>	<p>In addition to the key issue presented in the Scoping Report it was suggested that importance be given to resilience of the transport network and sustainability of resources.</p>	<p>Comment noted. The issue of the transport network resilience has been covered through the expansion of the aspects of the issue 7 (risk of flooding). It is believed that the issue of sustainable use of natural resources is sufficiently covered under the issue 8.</p>
	<p>Chapter 5 – Key Environmental Issues, Table 5.1, Objective 9 (Pressure on water resources)</p>	<p>Pressure on water resources should refer to pollution/contamination of water including run-off, and so on</p>	<p>Reference to pollution/ contamination of water including run- has been included as part of Key Issue 9 (Pressure on water resources).</p>
	<p>Chapter 5 – Key Environmental Issues, Table 5.1</p>	<p>Because of a suggested link between effects on local air quality related to traffic growth and congestion and; traffic growth and associated congestion it was suggested that we could split the issues into sub groups under Economic, Social, Health and Resources.</p>	<p>Comment noted. No action required. The Key Issues have been grouped under the SEA main areas: Environmental, Social and Health Specific (due to the fact that HIA is incorporated in this SEA). Please also see the comment above on the link between social and economic issues and the SEA focus.</p>

Appendix B – Environmental Report Consultation Responses

(To be read in conjunction with the Derby Final LTP3: Strategic Environmental Assessment Final Environmental Report to which all references apply)

Table B.1 – Consultees’ Comments on the Draft Environmental Report

Organisation	Advice/Comment	LTP3/SEA Comment?	Final LTP3 Response/Action	Responses from SEA team
Environment Agency	The EA welcomes the emphasis places upon climate change adaptation and mitigation in the Draft Scoping Report.	SEA	Support noted.	Noted. No suggested change to the Environmental Report
	The UK Climate Change Projections (UKCP09) predict there will be more extreme events in the East Midlands, such as an increase in the intensity of rainfall and increase in flooding. The predictions of the UKCP09 highlight the need to increase the resilience of the transport network to the impacts of climate change, such as being able to cope with flash flooding and more extreme temperatures. We recommend this is fully reflected in the Strategic Objectives of the Local Transport Plan.	LTP3	LTP3 Challenges reflect the need to adapt to the impacts of climate change	Noted. SEA objective 9 (To reduce vulnerability to climate change by minimising the impact of flooding and effects from other adverse weather conditions) recognises this as an issue and is used in the SEA framework. No suggested change to the Environmental Report.
	Please note that where new transport infrastructure is proposed, it should comply with the requirements of Planning Policy Statement 25: Development and Flood Risk. Transport infrastructure defined by a Local Authority as being ‘essential’ should also be designed and constructed to remain operational and safe for users in times of flood.	LTP3	Noted	Noted. PPS25 is one of the relevant plans, policies and programmes. SEA objective 9 also recognises this as an issue and is used in the SEA framework. No suggested change to the Environmental Report.
	<u>Sustainable Surface Water Management</u> We are promoting the use of Sustainable Drainage Systems (SuDS) in new transport infrastructure and, where possible, retrofitting of SuDS in existing highways. SuDS will help address the environmental effects of the Local Transport Plan (e.g. water quality; habitat loss; flooding; and drainage) by controlling surface water run-off as	LTP3	Already noted in SEA Environmental Report Key Environmental Issues (Table 7.1). This issue has	Noted. SUDS are acknowledged throughout the Environmental Report and are acknowledged as a form of mitigation in

	<p>close to its origin as possible and often mimic the natural processes for greenfield land. SuDS techniques also mitigate some of the adverse impacts of surface water discharges to receiving water bodies such as flooding and pollution and provide amenity and habitat value.</p> <p>SuDS can be retrofitted into existing highways and incorporated into traffic calming methods, which is a way of integrating environmental design into highway projects.</p> <p>Derby City’s Local Transport Plan should give consideration to preparation of the Derby Surface Water Management Plan, which aims to identify hotspots within the City at risk from surface water flooding that will be further investigated and an Action Plan developed to mitigate the effects of the flooding.</p> <p>The Surface Water Management Plan is at an early stage in its preparation but it is important that the Local Transport Plan has regard to the emerging findings in order to ensure that new transport infrastructure does not exacerbate surface water flooding and, where possible, to explore opportunities for new transport infrastructure to address existing surface water capacity problems.</p>		<p>been considered within LTP3 Problems and Challenges</p>	<p>section 12.3. As the Derby Surface Water Management Plan was not ready during the preparation of the Scoping Report and subsequent stages of the SEA, it has not been referenced. No suggested change to the Environmental Report.</p>
	<p><u>Green Infrastructure</u> We are actively promoting the benefits of green infrastructure, which are multi-functional networks of green spaces and greenways (including river and waterway corridors) that provide multiple benefits such as reducing flood risk; providing new habitat; connecting existing fragmented habitat; improving water quality etc.</p> <p>We feel there are strong links between the aims of the Local Transport Plan to encourage cycling and walking and discouraging the use of fossil-fuelled cars, and the 6C’s Green Infrastructure Strategy which aims to improve access; connectivity; recreation; and movement using green infrastructure networks and assets.</p> <p>Further information on green infrastructure is available on the East Midlands Green Infrastructure Network website at: www.emgin.co.uk/6Cs and publication of the final Green Infrastructure Strategy is expected shortly.</p>	<p>LTP3</p>	<p>Further information is included in the final LTP3.</p>	<p>Noted. Green infrastructure is acknowledged throughout the Environmental Report. The 6Cs Green Infrastructure Strategy is also acknowledged, for example in section 5.2 and table 7.1. Protection and enhancement of green infrastructure is even one of the SEA objectives (number 3) and therefore the LTP3 options have been systematically assessed against this objective. No suggested change to the Environmental</p>

				Report.
	<p>Air Quality We support the work of the Low Emissions Strategies Partnership and recommend that Derby's Local Transport Plan has regard to the Low Emissions Strategies Good Practice Guidance on using the planning system to reduce transport emissions, which provides advice on low emission transport projects and plans. A copy of the Good Practice Guidance is available at:</p> <p>http://www.defra.gov.uk/environment/quality/air/airquality/local/guidance/documents/low-emissions-strategies-2010.pdf</p>	LTP3	Derby's Air Quality Action Plan will be updated as appropriate to outline measures to respond to poor air quality.	Noted. A range of PPPs have been reviewed in respect to environmental topics, including air quality. SEA objective 1 (To protect and enhance local air quality, in particular in Air Quality Management Areas) focuses specifically on air quality and therefore the LTP3 options have been systematically assessed against this objective. No suggested change to the Environmental Report.
Natural England	<p>We would expect a transport strategy to cover the following areas in relation to the natural environment.</p> <ul style="list-style-type: none"> • Biodiversity, landscape, geodiversity and soils – through direct and indirect impacts from land take and traffic; • Climate change and energy – through greenhouse gas emissions and the environmental challenges posed by biofuels; and • Quality of life – through people's access to and experience of the natural environment, and through links between walking, cycling, health and well-being. <p>We acknowledge that these three areas are broadly covered in the LTP3 within the sections that appear under the headings of Transport Goals.</p> <p>Natural England is generally supportive of the proposed Transport Goals. We particularly support Goal 2 which aims to contribute to tackling climate change; Goal 4 which promotes walking and cycling; and Goal 5 which aims to improve the quality of</p>	LTP3	Support noted.	Noted. No suggested change to the Environmental Report

	<p>life including the enhancement of the environment and sense of place. These Goals complement our own objectives of protecting and enhancing the natural environment and we will make comments on these three objectives.</p>			
	<p>Goal 2: Contribute to tackling climate change by developing and promoting low carbon travel choices</p> <p>Natural England believes that there is a need for an integrated approach to climate change, addressing both adaptation and mitigation. As well as including policies that reduce carbon emissions the Local Transport Plan should recognise the opportunities that the transport network has to assist the natural environment in adapting to climate change. Sound design principles for new transport infrastructure and innovative management of the existing transport network could achieve multiple benefits for both the natural environment and for network resilience.</p> <p>We consider that the LTP3 has incorporated these aspirations into the plan and Natural England is therefore supportive of the approach taken towards tackling climate change.</p>	LTP3	Support noted	<p>Noted. Access to open space and nature is noted as an enhancement to the transport plan in section 12.3. No suggested change to the Environmental Report.</p>
	<p>Goal 4: Provide and promote greater choice and equality of opportunity for all through the delivery and promotion of accessible walking, cycling and public transport networks, whilst maintaining appropriate access for car users</p> <p>Natural England supports sustainable alternatives to car based transport and we welcome the promotion of accessible walking and cycling routes. We would also encourage LTP3 to include policies that will improve environmentally sustainable access to the natural environment for both local residents and visitors. More environmentally sustainable forms of access to the natural environment can deliver a range of benefits for people, the environment and the economy. Natural England encourages local transport planners to involve Local Access Forums, whose role is to advise local authorities on improving public access for open air recreation and enjoyment in the development of the LTP.</p> <p>The Public Rights of Way (RoW) network is an integral part of the transport system. It</p>	LTP3	Noted. LTP3 is fully integrated with Derby's RoWIP.	<p>No suggested change to the Environmental Report.</p>

	<p>provides a means of sustainable, active travel, particularly for short journeys, in both urban and rural areas, and can play a significant part in reducing traffic congestion and harmful emissions. Natural England encourages local transport planners to have early and continued dialogue with their RoW colleagues to ensure that the contribution the RoW network can make to LTP priorities is fully embedded in the plan.</p>			
	<p>Goal 5: Improve the quality of life for all people living, working in or visiting Derby by promoting investment in transport that enhances the urban environment and sense of place</p> <p>Natural England considers that it is of paramount importance that the Local Transport Plan seeks to protect and where possible enhance the natural environment including biodiversity, landscape, geodiversity and soils. Transport can directly and indirectly affect the natural environment and people’s experience of it in the following ways:</p> <ul style="list-style-type: none"> • Landtake by transport infrastructure, particularly roads, railways and airports, that causes loss of wildlife, habitats, natural features, landscape character and quality; • Severance and fragmentation of habitat where a transport scheme creates a barrier and can also deter people from walking and cycling; • Light and noise impacts on wildlife species and can reduce or destroy tranquillity; • Emission of a wide range of air pollutants and the pollution of watercourses through run-off from roads; • Wildlife mortalities; • Use of non-renewable resources such as primary aggregates and land and fossil fuels; • Traffic levels and congestion can undermine landscape character and quality. <p>We would therefore expect the LTP3 to take positive steps to avoid these impacts where possible, and whilst we recognise that the issue of environment protection has been tackled we would have hoped to see greater detail included. Nevertheless we are satisfied that issues such as threats to biodiversity and geodiversity and landscape protection have been more fully considered within the SEA.</p>	<p>LTP3/SEA</p>	<p>Noted that Natural England would like to have seen greater detail on environmental protection, however, they are satisfied that this has been covered in the SEA.</p>	<p>Noted. No suggested change to the Environmental Report.</p>

	<p>We would strongly recommend that the LTP3 should include coverage of the link between transport and delivering green infrastructure. Multi-functional green infrastructure can deliver a range of benefits for the natural environment and local communities, including health and recreation, climate change adaptation, flood alleviation and water management, sustainable transport and biodiversity. A green infrastructure network of existing and new RoW, quiet lanes and greenways, and other green spaces and corridors provides an essential framework for an effective non-motorised transport network threading through an urban area, linking homes to schools, places of employment, recreational areas and the countryside.</p> <p>We note that the issue of green infrastructure is covered well in the SEA. In the review of plans and programmes the 6Cs Green Infrastructure Strategy is seen as being of particular importance. This document aims to protect, enhance and extend networks of green spaces and natural elements in and around the three cities of Leicester, Nottingham and Derby, connecting with their surrounding towns and villages. We would therefore suggest that green infrastructure is given a higher profile in the main LTP3 document (Part 1 – Strategy).</p>	LTP3	Noted. Green Infrastructure and it's links to Highways and Transportation issues is included within LTP3.	Noted. No suggested change to the Environmental Report for the time being.
	<p>Derby's Long Term Proposed Transport Strategy</p> <p>Natural England would have preferred the choice of Alternative 3 as the chosen proposed Transport Strategy as this is considered by the SEA to be the most sustainable overall as it does not exhibit any significant negative effects and has no significant environmental effects.</p> <p>We are also concerned to note that under SEA objective 3 "<i>To protect and enhance biodiversity the natural environment and green infrastructure</i>" that none of the alternative strategies scored positively.</p> <p>Whilst we understand that Derby City is an urban environment with limited areas of "natural" environment we would urge the Council to take a more positive step in creating enhancements to biodiversity particularly through making net gains to the green infrastructure network.</p> <p>We also support the Mitigation measures set out in section 12 of the SEA and would emphasise the importance of following these through to counteract any negative environmental effects of the proposed strategy.</p>	SEA/LTP3	Comment noted. It was decided that a balanced approach to the four themes would be taken in order to enable support for all modes of sustainable travel. Alternative 3 only gives minimum support to Public Transport. Therefore it was decided that a hybrid alternative for alternative 3 with additional public transport measures of the order of Medium	Noted. No change to the Environmental Report for the time being.

			<p>level of support or High level of support could therefore be the most balanced and environmentally and socially beneficial strategic alternative.</p>	
	<p>Strategic Environmental Assessment (SEA) – Draft Environmental Report</p> <p>Natural England generally considers that the SEA has been carried out thoroughly and follows an accepted methodology. It covers Natural England’s interests comprehensively and represents our main concerns of protecting and enhancing the natural environment.</p> <p>In particular we consider that your justification (1.7 Habitat Regulation Assessment) for deciding the nature of the plan and the scope of its potential impacts is robustly explained in this section and we agree with your conclusions that further assessment under the Habitat Regulations is unnecessary.</p> <p>We recognise that the assessment of other relevant policies, plans or programmes and environmental protection objectives, is comprehensive though we would have expected to see the Derbyshire Landscape Character Assessment included. This document is essential in the consideration of proposals to ensure future transport developments are in keeping with the landscape character of the surrounding area.</p> <p>The baseline is presented in a table form and covers the topics of biodiversity, geodiversity and landscape which are particularly relevant to Natural England’s interests. It shows the designated sites within the area covered by LTP3, the condition of SSSIs and the landscape character areas present. Therefore we would agree that the essential baseline data is provided.</p> <p>Natural England generally agrees with the key issues identified particularly (1) Threats</p>	<p>SEA</p>	<p>Clause noted.</p> <p>We will look at whether the Derbyshire Landscape Character Assessment should have been included. Having revisited this briefly it seems that the landscape of Derby and it’s surrounding areas are not mentioned, However, this could be mentioned/included as a point for consideration for landscape character for those developments close to surrounding areas mentioned in the document.</p>	<p>Noted. The Derbyshire Landscape Character Assessment has been added to the list of relevant PPPs in Appendix A. It has been looked at in the preparation of the SEA. The Derbyshire Landscape Character Assessment provides a useful summary of the different landscape types in Derby, which whilst predominantly classified as ‘urban’, also includes Character Areas such as Trent Valley Washland and the Peak Fringe and Lower Derwent, together with Landscape Type categories such as wet pasture meadows and riverside meadows. Whilst this is useful contextual information, this is just one of several considerations made during the</p>

	<p>to biodiversity and geodiversity and note that opportunities for encouraging green infrastructure are included here. We also agree with the inclusion of (2) Pressure on Derby landscape and townscape.</p> <p>The advice given by Natural England in this letter is made for the purpose of the present consultation only. In accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England expects to be included as a consultee in relation to any additional matters to be determined by Derby City Council that may arise as a result of, or are related to, the present proposal. Natural England retains its statutory discretion to modify its present advice or opinion in view of any and all such additional matters or any additional information related to this consultation that may come to our attention.</p>			<p>landscape assessment in the SEA.</p>																
<p>NHS Derby City</p>	<p>The LTP is crucial to achieving a number of public health outcomes proposed in the recent Public Health Outcomes Framework. The Framework is evidence-driven and aims to promote joint working where local organisations share common goals. The Outcomes Framework will be used alongside the Joint Strategic Needs Assessment to determine local priorities for Derby.</p> <table border="1" data-bbox="342 853 1227 1233"> <tr> <td>D2.14</td> <td>Access and utilisation of green space</td> </tr> <tr> <td>D3.1</td> <td>Prevalence of healthy weight in 4-5 and 10-11 year olds</td> </tr> <tr> <td>D3.2</td> <td>Prevalence of healthy weight in adults</td> </tr> <tr> <td>D3.5</td> <td>% adults meeting the recommended guidelines on physical activity (5 x 30 mins per week)</td> </tr> <tr> <td>D3.6</td> <td>Hospital admissions caused by unintentional and deliberate injuries to 5-18s</td> </tr> <tr> <td>D3.10</td> <td>Self reported wellbeing</td> </tr> <tr> <td>D5.4</td> <td>Mortality rate from all cardiovascular disease (including heart disease and stroke) in persons <75 years</td> </tr> <tr> <td>D5.7</td> <td>Mortality rate from chronic respiratory diseases in persons <75 years</td> </tr> </table>	D2.14	Access and utilisation of green space	D3.1	Prevalence of healthy weight in 4-5 and 10-11 year olds	D3.2	Prevalence of healthy weight in adults	D3.5	% adults meeting the recommended guidelines on physical activity (5 x 30 mins per week)	D3.6	Hospital admissions caused by unintentional and deliberate injuries to 5-18s	D3.10	Self reported wellbeing	D5.4	Mortality rate from all cardiovascular disease (including heart disease and stroke) in persons <75 years	D5.7	Mortality rate from chronic respiratory diseases in persons <75 years	<p>LTP3</p>	<p>Noted.</p>	<p>Noted. No suggested change to the Environmental Report.</p>
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	<p>The LTP and its transport objectives presents a major opportunity to contribute towards these public health outcomes through getting more people walking and cycling more often.</p>	<p>LTP3</p>	<p>Support for continued partnership working is</p>	<p>Noted. Health is covered by SEA objective 13 (To protect and improve the health</p>																

	<p>The PCT therefore welcomes and supports the LTP as a major opportunity to promote more active travel locally, through improved infrastructure and targeted promotional activities.</p> <p>Active travel should be central to the LTP and the PCT (through public health) is keen to work with Derby City Council in implementing its Goals.</p> <p>The PCT seeks assurance that the City Council is able to deliver the LTP Goals relating to active travel effectively given the recent cuts. In particular we would welcome further information in relation to:</p> <ul style="list-style-type: none"> • Current levels of walking and cycling and how this is going to be increased. <p>We welcome the opportunity to work alongside the City Council in developing and supporting implementation plans in relation to this.</p>		<p>welcomed. LTP3 recognises the importance of encouraging active travel to support the long term strategy.</p>	<p>of Derby's population and reduce health inequalities between areas and groups) and therefore the LTP3 options have been systematically assessed against this objective. No suggested change to the Environmental Report.</p>
<p>English Heritage</p>	<p>Generally, we are broadly content with the SEA and are pleased that you have taken account of the comments we made at the scoping stage. We do, however, have a few comments on the SEA with regard to the historic environment and landscape and townscape character, which are set out below.</p>	<p>SEA</p>	<p>Noted</p>	<p>Noted. No suggested change to the Environmental Report.</p>
	<p>Page 96 Landscape and Townscape Character In the assessment it is suggested that measures such as dedicated cycle ways and improved pedestrian and cycle routes would result in positive impacts on townscape character. This will depend on the design of a scheme, as the introduction of new infrastructure and signage could increase street clutter and thus have the opposite effect.</p>	<p>SEA</p>	<p>Commented.</p>	<p>Noted. It is recognised that public realm interventions such as pedestrian and cycle routes can both beneficially and adversely affect landscape and townscape character. As such, we have changed some of the cultural heritage (SEA objective 4) and landscape and townscape (SEA objective 5) assessments to reflect a neutral outcome as opposed to a minor</p>

				<p>positive outcome. This has been changed in Table 10.3. In addition, the summary Table 10.4 has also been updated, as has the text in section 10.5</p>
	<p>Pages 124, 126 and 128 A38 junction improvements The assessment of the impacts of the scenarios on the historic environment says that there are likely to be 'no effects on the historic environment'. However, both of these scenarios include the A38 junction improvements and the Abbey Hill junction, in particular, could affect heritage assets, including the World Heritage Site and there is a high potential for buried archaeological remains. This probably does not affect the overall assessment of the 'Aspirational scenario' as 'minor adverse', but it does not explain why the 'Most Likely funding scenario' is only 'neutral or no effects'. The absence of the A38 grade separated would clearly reduce the potential negative impacts on the historic environment, although this is not acknowledged in the section at 11.4.4.</p>	<p>SEA</p>	<p>Commented.</p>	<p>Noted. Upon further more detailed consideration of the location of the A38 grade separation and the location of the Derwent Valley Mills World Heritage Site, we agree with the precautionary approach suggested by English Heritage. We have therefore made changes to the assessments in several places, including:</p> <ul style="list-style-type: none"> • Table 11.4 • Table 11.5 • Section 11.4 – Sensitivity test without the A38 works • Section 11.5 – Summary and recommendations. • Appendix F – Assessment of LTP3 preferred options <p>In essence, changes now reflect that there may be significant adverse effects on</p>

				<p>historic assets (SEA objective 4) and landscape/townscape (SEA objective 5), with consequential changes for mitigation (see also section 13) and monitoring (see also section 14).</p> <p>We have added a map to the Environmental Report which shows clearly the WHS location, as well as listed buildings and conservation areas.</p>
	<p>Monitoring, Table 13.1 It seems that it is being recommended that monitoring should only cover those objectives where significant effects have been identified, which excludes SEA objectives 4 and 5 on the historic environment and landscape and townscape character. In view of the comments above and in the light of uncertainties regarding potential impacts on these objectives, we recommend that these aspects are monitored in order to identify any unanticipated negative impacts, based on the indicators on pages 58 and 59. With regard to townscape, the two design indicators would be particularly relevant. It could also be linked to the monitoring of 'Conservation Areas at Risk' which is part of the Heritage at Risk data set.</p>	SEA	This will be discussed.	<p>Noted. Agree with the recommendations made by English Heritage and indicators for SEA objectives 4 on historic assets and 5 on landscape and townscape will be added to the monitoring framework in section 14 of the Environmental Report.</p>
Derby and South Derbyshire Friends of the Earth	<p>That the LTP3 Environmental Scoping Report recognises that ill health will increase with increasing poorer air quality, especially in wards such as Sinfin, Derwent, Chaddesden etc. The Parliamentary Audit Committee's Air Quality Report (PACQ) of March 2010 states that the health costs of poor air quality are more than those of obesity and passive smoking. At no point is this acknowledged or made public.</p>	SEA/LTP3	<p>Comments have been noted. LTP3 explains that as major schemes come forward they will be subject to EIA that will identify potential environmental</p>	<p>Air quality, pollution, greenhouse gas emissions, health and inequalities are all acknowledged through the LTP3 Goals, Challenges, strategic alternatives and preferred options.</p>

			impacts arising from proposals, including Air Quality impacts, and specify how these will be mitigated.	These same issues are dealt with systematically through the SEA in terms of the baseline information, key issues, SEA objectives and framework, compatibility assessment, strategic alternatives and preferred options. Air quality, pollution and greenhouse gas emissions are all assessed quantitatively for the preferred options assessment with minor adverse effects noted. The SEA also covers the requirements of HIA. No suggested change to the Environmental Report.
	Those wards with the poorest health rates are already under considerable unsustainable development strain, leading to excessive traffic and emissions.	SEA/LTP3	Noted	See above. No suggested change to the Environmental Report.
	The Derby City PCT stated in a letter to Derby Friends of the Earth that rates of cancer, heart disease and respiratory illnesses had not improved in the industrially polluted and deprived Sinfen area since 2005 (Derbyshire Area Health Profile 2005) This is nothing short of a scandal in a developed country.	SEA/LTP3	Noted	Noted. No suggested change to the Environmental Report. However, it is important to note that the LTP3 is a transport plan and not a spatial plan that covers industrial uses.

	<p>As the draconian cuts visited upon the poorer sections of society will affect the underclass the most - that is those sectors of society who live in the worst affected areas outlined in the LTP3 scoping report, including Sinfin - the very people whom the LTP3 Transport Plan purports to aid, will in fact be abandoned to further industrial development and the ensuing traffic, which will be brought to bear on Air Quality Management Areas which are already at capacity in terms of traffic (Acknowledged during the Sinfin incinerator inquiry held in September 2010).</p>	SEA/LTP3	Noted	<p>Noted. No suggested change to the Environmental Report. However, it is important to note that the LTP3 is a transport plan and not a spatial plan that covers industrial uses.</p>
	<p>The City and County Councils continue to encourage heavy lorry traffic to use the AQMAs as they are the inbound routes to the city and industrial areas, despite alternatives not being examined ie the sharing of freight wagons, addressing waste in a reductive manner, the existence of the railway line, the canal's re-emergence</p>	SEA/LTP3	Noted	<p>Noted. No suggested change to the Environmental Report.</p>
	<p>The climate change aspects of unsustainable development are not being taken seriously enough by the City Council and this is evidenced in the lack of any real policy to curtail large-scale emissions ie the plans for incinerators - the Sinfin incinerator alone would produce 172,000 tonnes of carbon dioxide each year and the traffic would worsen an AQMA. The new Boyle Electrical incinerator - currently the permit is set to be granted by the EA - will also worsen an AQMA for nitrogen dioxide, acknowledged by the City Council Environmental health Department. Such developments impact on the AQMAs yet are not included in the LTP3.</p>	SEA/LTP3	Noted	<p>Noted. No suggested change to the Environmental Report. However, it is important to note that the LTP3 is a transport plan and not a spatial plan that covers industrial uses.</p>
	<p>Nitrogen dioxide produced by industry outweighs that of traffic (PACQ) and this is also not acknowledged, despite the effects of nitrogen dioxide in worsening AQMAs.</p>	SEA/LTP3	Noted	<p>Noted. No suggested change to the Environmental Report. Derby City Council to comment. However, it is important to note that the LTP3 is a transport plan and not a spatial plan that covers industrial uses.</p>
	<p>We believe it is now up to Transport Departments to make more of the fact that industry worsens AQMAs, and that the health of Derby people, especially children and older people, will not improve under the current system.</p>	SEA/LTP3	Noted	<p>Noted. No suggested change to the Environmental Report. Derby City Council to comment. However, it is important to note that the LTP3 is a transport</p>

				plan and not a spatial plan that covers industrial uses.
	Greater links should also be made with the Environmental Health Departments, the PCT and related bodies	SEA/LTP3	Noted	Noted. No suggested change to the Environmental Report. The SEA already makes various mentions to consultation and liaison with Environmental Health Departments and the PCT, and therefore this is likely to have already occurred and be ongoing
Member of the public	In your green report I noticed your green policy include land use in Derby but to improve CO2 reduction I would increase the planting of trees along rivers areas and in urban areas include more trees and plants in parks and open spaces will help reduce future flood levels through planting taking up water.	SEA	Comments noted.	Noted. Tree planting is recommended as a form of mitigation in section 13. However, tree planting needs to be either in relation to transport schemes or allied to spatial planning or environmental initiatives. No suggested change to the Environmental Report.
	Healthcare The welcome your report regarding health needs and access to Royal Derby Hospital but plans are under way that people in Spondon, Ockbrook and Borrowash could have their treatment transferred to the QMC in Nottingham because it quicker to travel by car to Nottingham compared with travelling to the Royal Derby Hospital because of A52 congestion include City Centre congestion. The bus services from Spondon do not cover A&E in Derby with many buses do not operate before 5am or after 11.30am	SEA	Derby City Council and RDH continue to work closely on transport issues through the RDH travel Plan. Further bus routes from lesser accessible	Noted. No suggested change to the Environmental Report.

	include bank holiday and over the Christmas period.		parts of the city have since been introduced in order to increase accessibility to the RDH site.	
	I hope you can create additional report how parking charges will affect congestion and traffic pollution in the city of Derby.	LTP3/SEA	Current Government Policy means that we have to balance the needs of the economy and the environment. Derby City Council has therefore modelled the effects of increasing parking charges and reducing long-stay parking to short-stay parking. The results of modelling shows that Increasing parking charges does reduce morning peak traffic, however, this creates capacity for short stay parking and increases traffic in the interpeak (during the day).In terms of attracting visitors to the city there is a benefit in reducing stay times but	No suggested change to the Environmental Report.

		conversely this increases overall car travel (but not congestion) over the course of the day and so total CO ₂ emissions. The balance in parking needs to be carefully managed as not to encourage car travel and congestion but also maintaining the vitality of the city centre. This will need to be looked at as part of the forthcoming Car parking strategy.	
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