

## **APPENDIX 9: CONSULTATION COMMENTS**

This appendix contains the formal responses from the SEA consultation exercises, both for the scoping report and for the draft Environmental Report (only one response received). Please note that references of page numbers or chapters refer to the consultation drafts, and will not correspond directly to the final reports.

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17 JUN 2005			



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Transport Policy  
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**Our ref:** RA/2005/025267-1/1  
**Your ref:** TNS/261/SEA  
TPP 40.6

**Date:** 16 June 2005

FAO: David Cherry  
Louise Holliday

Dear David & Louise

**DRAFT SCOPING REPORT - STRATEGIC ENVIRONMENTAL ASSESSMENT  
WEST YORKSHIRE LOCAL TRANSPORT PLAN (2006-2011)**

The Environment Agency welcomes the opportunity to comment on the proposed Strategic Environmental Assessment (SEA) for the West Yorkshire Local Transport Plan (LTP) and on the provisional LTP (2006-2011). We consider that local transport planning should be integrated with other strategic plans and programmes to achieve sustainable development.

The law requires that local transport authorities must assess the likely significant effects of the LTP on the environment, including:

- biodiversity, fauna and flora,
- population
- human health,
- soil, water, air,
- climatic factors,
- material assets,
- cultural heritage (including architectural and archaeological heritage),
- landscape,
- the interrelationship between the above.

Table 2.2 of the SEA sets out the objectives and indicators and appears to cover all of the above.

Many of these are carried over with clarity into the LTP. There are, however, some notable exceptions.

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Alternative technologies (eg Fuel cells, hybrid vehicles, LPG, Biofuels) could contribute to the reduction in greenhouse gas emissions. The SEA and the LTP refer to alternative renewable energy fuels but only in relation to District fleet vehicles & contractors vehicles. Consideration should be given to the future development of the required infrastructure that would encourage & enable the wider use of alternative fuel technology.

The SEA identifies Sustainable Urban Drainage systems (SUDs) as a measure of reduced disruption from flooding, as well as a reduction in detrimental impact of transport on water quality. The main concern relates to the capacity of existing surface water drainage systems however, with no mention of the level of flood risk within identified flood zones. Increasing transport infrastructure may interfere with flood storage areas, and flood risk is also an important factor in emergency planning, transport and access to services. These issues also need to be considered.

The effects of flooding are a major concern, particularly as many of the roads and railways cross over the rivers and waterways of the region, with the associated bridge structures requiring maintenance & improvement. Whilst other aspects of climate change impact are identified (wind/thermal), there is no clear indication in the LTP that the maintenance & improvement of transport infrastructure will be robust enough to withstand flooding events.

The impact of transport on water quality is clearly recognised with the SEA and the LTP, however, the focus remains on surface water impact. There is a need to consider their impact on sensitive groundwater, particularly where aquifers are used for potable water abstraction.

The SEA also includes the objective of "maximising the efficient and effective use of materials and minimise the amount of waste generated". Whilst this is not a required topic, it was considered by the SEA task group to be a potentially significant area in relation to road construction and maintenance activities. Given this decision it is somewhat surprising to find no outcome/target in the five year action plan details in the LTP.

Further consideration should also be taken with regard to the End of Life Vehicles Directive. The LTP focuses on the need upgrade & improve existing rolling stock but no mention is made of the manner of disposal of redundant vehicles.

The LTP recognises the impact that transport infrastructure has on landscape and biodiversity through land take & accidental spillages, and acknowledges that improvements will have to be "managed sensitively and that habitats and species are protected from potential adverse effects". Transport Policy also currently recognises a presumption against development in environmentally sensitive areas. However, there is no reciprocal outcome/target in relation to BAP habitat & species in the five year action plan.

As you will appreciate, it would be difficult to provide bespoke comments on the document to each local transport authority. Therefore, unless there are exceptional circumstances, we will not be able to provide further comments on successive documents prepared as part of this process. However, we would welcome a copy of the final Report and Plan produced.

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The Environment Agency acknowledges the strategic nature of the SEA in that it does not address environmental issues at the project level. We would expect these issues to be taken into consideration in any future Environmental Impact Assessment (EIA) submitted to the Environment Agency for deliberation. When considering minor schemes for implementation, which do not require associated EIAs, please contact the Environment Agency at any stage if it is felt that we might be able to offer any advice or assistance.

Yours faithfully



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