

DC/ES/266

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YORKSHIRE REGION

Mr D Gibson,
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Our Ref: HD/P5040/07

Your Ref: TNS/261/SEA

Date: 29 April 2005

DEVELOPMENT DEPARTMENT			
To	Action	File	File
- 3 MAY 2005			
File Number			

Dear Mr Gibson,

West Yorkshire Local Transport Plan (2006 - 2011) SEA Draft Scoping Report

Thank you for consulting English Heritage on the above Report.

We consider that the Scoping Report provides an appropriate framework for assessing the likely impact of the Plan's proposals upon the historic environment. In general terms, the Report has outlined the environmental context, established a good set of criteria, and proposed suitable Indicators and Baseline Data for the historic environment against which to assess the LTP options.

Given the strategic nature of the Options, we would, on the whole, agree with the conclusions reached regarding their likely effects.

There are, however, a small number of areas where it is considered that some amendments are necessary. These are as follows:-

Page	Paragraph/Section	Comments
5	Box 1.1	In view of the NATA Objectives, it is disappointing that the objectives for the draft LTP2 do not include one relating to ensuring that LTP proposals minimise the adverse effects upon the environment.
9	Box 2.1	Objective 5 - Whilst we support the principle of this Objective, it might be better to refer to "landscape and townscape character" rather than "diversity". The aim should be to ensure that those elements that make the landscape and townscape unique are adequately safeguarded rather than, necessarily, making them more diverse from one another.

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Page	Paragraph/Section	Comments
9	Box 2.1	Objective 6 - Whilst we support the principle of this Objective, it is not clear what " <i>historical rescues</i> " might entail. It would be better to use something like " <i>archaeological areas</i> " since this would relate directly back to the wording of the Directive. In addition, given the requirements of primary legislation, the following should be added to this objective " <i>or their setting</i> "
9	Box 2.1	Objective 15 - Whilst we support the principle of this Objective, it should be referring to soil quality, otherwise, the LTP may be putting forward proposals which retain the amounts of soil but actually degrade its actual character.
11	Figure 2.1	The relationship of Objective 14 (the support employment, economic competitiveness and the revival of regeneration priority areas) to Objective 5 (landscapes/townscapes) and Objective 7 (heritage) would appear to be similar to that for the natural environment (Objective 7) and perhaps ought to be annotated as " <i>uncertain</i> "
11	Figure 2.1	The protection of soil quality (Objective 15) is likely to have a positive impact upon archaeological remains (considered under Objective 6) and perhaps ought to be recorded as " <i>Compatible</i> "
14	Table 2.2 SEA Objective 6	In view of the comments earlier, after " <i>and structures</i> " add " <i>or their settings</i> "
74	Appendix 1	National - Reference should also be made to the following Acts relating to the historic environment <ul style="list-style-type: none"> • <i>Planning (Listed Buildings and Conservation Areas) Act 1990</i> • <i>Ancient Monuments and Archaeological Areas Act 1979</i>

Finally, in terms of the SEA, we should like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not reflect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the LTP) where we consider that, despite the SEA, these would have an adverse effect upon the environment



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If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,



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