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

Thank you, for consulting the Countryside Agency on the SEA draft scoping report, which we received on April 1<sup>st</sup>.

Our role as statutory consultee is governed by the nature of our environmental interests. The extent of our environmental interests relate to:

- landscape character and tranquility;
- visual amenity and enjoyment of the countryside as a whole;
- recreational opportunities; and
- enjoyment of access land or a public right of way.

On receiving a consultation the Countryside Agency will assess the report against the criteria, "is there a significant effect on the landscape or the enjoyment of it through access".

**Overall Comments**

On the whole the report is well presented, clearly structured and provides a comprehensive analysis of the existing state of the environment in West Yorkshire. However there is a disappointing lack of reference in relation to landscape and particularly access to the countryside and the impact in rural areas.



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There is no distinction in the report between the urban and rural areas of West Yorkshire. The impact of the LTP and the options exercise, will have considerably different effects in rural areas compared to urban and this should be reflected in the SEA. The only clear reference the report does make is to the impact of traffic on tourist areas.

The Office for National Statistics, ODPM and DEFRA have developed a Rural and Urban classification, see website [www.statistics.gov.uk/geography/urban\\_rural.asp](http://www.statistics.gov.uk/geography/urban_rural.asp) This classification would clearly help with monitoring of the LTP.

The Yorkshire and Humber Assembly have developed a set of 15 objectives (copy enclosed) to appraise the sustainability of RSS and RTS, there is obviously a compatibility with the 16 objectives developed for this report but it is not made clear.

#### **Local countryside character**

The report has made good reference to Countryside Character but also needs to utilise the information that the five local authorities should have available through their landscape character assessments. Reference to special landscape areas is relevant but the impact of the LTP on all the landscape and townscape of West Yorkshire needs to be evaluated.

In appendix 4, the impact of the network measured against Objective 5 does not adequately reflect the impact upon the landscape for example, in Option 1, new roads in the countryside will have a considerable impact through new infrastructure and the air pollution, noise and visual intrusion of traffic.

The Peak District National Park is specifically referred to in the report, however, no reference is made to the impact of LTP2 upon the nationally designated landscapes immediately bordering West Yorkshire, these are the Nidderdale AONB and the Yorkshire Dales National Park.

To assist in monitoring landscape change the Countryside Agency has developed an indicator of change in countryside quality based on landscape character, titled Countryside Quality Counts for further information see website [www.countryside-quality-counts.org.uk](http://www.countryside-quality-counts.org.uk)

### **Access and Recreation issues**

Access to the countryside and recreation opportunities throughout West Yorkshire are a vital component of quality of life, in our opinion the report provides little reference. Rights of way are referred to briefly in appendix 4, however, rights of way are only a component of accessibility by foot, cycle or horse. Access should be considered in its widest context, all five local authorities should hold considerable baseline information. The strategy for access in all local authorities is being developed through the Rights of Way Improvement Plan (RoWIP).

RoWIP's can make a considerable contribution to achieving the shared priorities of the LTP if fully integrated into the Plan. RoWIP's should be used as a tool for improving access to all functions (employment, education, services) and not just a means of improving access to the countryside from urban areas.

The Pennine Way National Trail traverses the western area of West Yorkshire and is probably England's best known National Trail, despite this it is not mentioned. The Pennine Way is a valuable recreation resource and the impact of the LTP should be assessed. For further information see [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk)

Improving quality of life is a key aim of LTP2's, the Countryside Agency in association with the British Heart Foundation has developed the 'Walking the Way to Health Initiative'. This initiative has established many projects throughout West Yorkshire and may provide additional information to support the report, see website [www.whi.org.uk](http://www.whi.org.uk)

### **Rural Accessibility**

In the opening comments of this response I referred to the need to distinguish between urban and rural, within this heading are some specific issues of concern.

It is not clear from the report how the impact of the LTP is going to be monitored in rural areas within the context of measures to reduce the growth in motor vehicles and the need to travel. Very little coverage is given to demonstrate awareness of the many rural transport initiatives already underway within the County, and thus very little consideration appears to have been given to an assessment of the impacts of the promotion of alternative modes of travel in rural areas.

Little evidence is provided of liaison with Rural Transport Partnerships and the existing contribution they are making to sustainable improvement of rural accessibility.

**Other Comments**

1 Cross boundary travel patterns and their impacts are not treated in any depth. West Yorkshire experiences considerable in-migration and commuting is a major contributor to rural congestion. In our opinion this issues in inadequately addressed in the report.

2 In appendix 4, it would assist cross referencing if the SEA Objectives contained the description text as well as the number.

We would like to take this opportunity to remind you to consult the Countryside Agency at the next stage of the LTP Environmental report.

If you require any further information or have any questions please do not hesitate to contact me.

Yours sincerely

Chris Marshall  
Countryside Agency – Landscape, Access & Recreation