

Author	Comment	KCC response
Maidstone Borough Council	<p>Section 1.2.2 sets out the questions which will be used in assessing the effects of LTP4 on each environmental topic. These questions are sensible but the desired Outcomes and Options for LTP4 are not presented. Without these, it is not clear what the SEA objectives, criteria and indicators (linking to the quoted data sources) actually are, or if they are intended to be defined at all. This would be beneficial to ensure that the impact of LTP4 is transparently and robustly measured. It is important that the SEA and draft LTP4 documents inform one another and are not produced in isolation. On the theme of integration with other policy documents and strategies, it is assumed that the desired Outcomes and Options identified for LTP4 will be informed by the priorities established in the Kent Environment Strategy 2015.</p> <p>It is noted that there is a requirement for Habitats Regulations Assessment Screening to be undertaken for the LTP4. This has recently been undertaken as part of the evidence base supporting the Maidstone Borough Council Local Plan. Therefore it will be appropriate that the methodology remains consistent between these documents to ensure robust recommendations are also consistent.</p>	<p>Noted</p> <p>Noted</p>
Tonbridge & Malling Borough Council	Some recognition of the AQMAs in Tonbridge Town Centre and the A20/A25 corridor in TMBC is included in paragraph 2.2.1.	CHANGED TO: Transport is a significant contributor to poor air quality and its associated health problems in Kent, as evidenced by Kent's 39 declared Air Quality Management Areas (AQMAs); the majority of which are located on main roads or motorways. They have additionally been declared in town centres of Canterbury and Tunbridge Wells, the docks at Dover, Tonbridge Town centre, A20/A25 corridor in Tonbridge and Malling and areas of Maidstone and Thanet (see Figures 3 & 4). The M25, M20, M2 and A299 are major transport corridors with the heaviest traffic flows between Kent's town centres.

Environment Report

The Draft Environmental Report and Draft LTP4 were the subject of public consultation from August 2016 until October 2016. The Draft Environmental Report, which included the information contained in the Scoping Report, presented the assessment of effects of the LTP4 strategic alternatives and of the LTP4 preferred strategy, proposed mitigation measures and recommendations to improve the environmental performance of the LTP4, and proposed a preliminary monitoring programme for the significant effects identified by the SEA. The following stakeholders were consulted on the Draft Environmental Report and Draft LTP4

- Natural England
- The Environment Agency
- English Heritage
- Highways Agency
- Neighbouring local authorities
- British Waterways

Summary of Comments	Action Taken
One of the major issues with the transport corridors that cross the County is that they act as significant barriers to the movement of many species and as result causes fragmentation of their range.	In LTP4 not SEA
We would recommend that consideration is given to the installation of habitat bridges e.g. such as the one on the A21 at Lamberhurst, and other measures that assist in the movement of species.	In LTP4 not SEA
The aims of an enhanced environment could be better illustrated in the sections on specific proposals e.g. New Lower Thames Crossing. Reference is made to minimising impacts but a more ambitious outcome would be to aim for a net biodiversity gain and no fragmentation.	In LTP4 not SEA
2.1. Biodiversity, flora and fauna, The baseline refers to: - Five Ramsar Wetland Sites but there are now six following the designation of the Dungeness, Romney Marsh and Rye Bay Ramsar Site. It is noted that six are mentioned in the HRA in Appendix I;	Now corrected in both the body text p.24. The number of SPAs has also been updated to 6 in line with JNCC guidance.
2.1. Biodiversity, flora and fauna, The baseline refers to: - 101 Sites of Special Scientific Interest (SSSIs) but the number of SSSIs wholly or partly within Kent is 98 with an area of 34,364.22ha	Now corrected and % cover recalculated as to 8.8%

2.1. Biodiversity, flora and fauna, The baseline refers to: - The statistics on the condition of SSSIs are based on June 2010. This is now 6 years out of date. The statistics on 8 September 2016 were: favourable 67.45%, Unfavourable Recovering 29.87%, Unfavourable No Change 1.74%, Unfavourable Declining 0.88%, and Destroyed 0.07%	Now corrected - % meeting PSA targets is very marginally improved to 97.3%
2.2. Air - The section on air quality concentrates on the human health issues. However, many vegetation types are very much more sensitive to air pollution and some designated sites are already in exceedance of their critical loads or levels for nitrogen deposition or NOx. It is therefore necessary for any transport schemes to assess the impact of additional vehicle movement on habitats within 200m of a road. For sites that are already in exceedance, new schemes should consider how this could be improved.	AQMAs are focussed on the highest areas of air pollution in the county, where exceedances occur, with targets set to manage and reduce the impact on all sensitive receptors. Continuous air quality monitoring sites tend to be at roadside locations and therefore data for rural locations is less readily available. We would look to designated site condition and any specific information to determine any direct links to condition status falling due to air quality and N deposition. Also, the full impact on each SSSI is outside the scope of the SEA and would fall into the realms of an Env Impact Assessment for any works commissioned.
2.2. Air - Table 14 - The objectives for Air quality focus on urban areas and the achievement of National Air Quality (NAQ) objectives and the objectives in Air Quality Management Areas (AQMA). Could these be widened to encompass targets on improving air quality on sites currently in exceedance?	AQMAs are focussed on the highest areas of air pollution in the county, where exceedances occur, with targets set to manage and reduce the impact on all sensitive receptors. Continuous air quality monitoring sites tend to be at roadside locations and therefore data for rural locations is less readily available. We would look to designated site condition and any specific information to determine any direct links to condition status falling due to air quality and N deposition. Also, the full impact on each SSSI is outside the scope of the SEA and would fall into the realms of an Env Impact Assessment for any works commissioned.
Habitats Regulations Assessment (HRA) Screening Report: The six Ramsar Sites have not been included within Table 1: Summary of Natura 2000 sites and qualifying features, or Table 4: Screening Matrix. Under government policy Ramsar Sites are given the same protection as Natura 2000 sites and therefore should be included within the tables.	Although not explicitly listing the SPAs as Ramsar sites, the HRA does note in section 2.1.1, p. 6 that as the majority of Ramsar sites are SPA's they also receive protection under the Birds Directive.

Comments and suggestions received from the public and private organisations on the draft LTP4 have helped KCC to make changes to the Plan, including strengthening the links to other KCC policies and the policies of other organisations, and making some sections clearer. KCC also had many suggestions for new priorities and have been able to incorporate some of those into the revised Plan. An overview of the comments and subsequent changes are set out in table below:

Comment	Action carried out
There should be more links to London made.	We have included reference to The London Plan and acknowledged the importance of London as a destination, particularly for rail commuters.
There needs to be more emphasis on sustainable transport.	We have strengthened links to existing policies, such as the Active Travel Strategy, and included the Public Rights of Way network centrally within the Plan. We have also provided more detail on the bus and rail networks.
It is unclear if the transport schemes are in a priority order, particularly the strategic schemes.	We have made it clear that they are presented in a way that links the different priorities, not in an order of importance.
'Enabling Growth in the Thames Gateway' should recognise the geography of the Thames Estuary Commission.	We have broadened the geographical scope of this page to include all districts in the Thames Estuary.
'Port Expansion' should recognise the role of other ports in the county.	We have included the Port of London, Port of Sheerness and Port of Ramsgate in this page, recognising the role of all Kent's ports.
There should be more information on bus and rail transport and how KCC will influence the services.	We have separated the strategic transport priority 'Rail and Bus Improvements' into two individual priorities to fully explain KCC's role.
You should clearly support international rail services in Kent.	We have included more support for international rail services in Kent and welcomed future opportunities for new international destinations.
There needs to be more for rural areas, particularly in relation to buses.	We have expanded the information on buses and community bus services, recognising that these may be the only alternative to the car in rural areas.
The terms 'Kent-wide' and 'Countywide' are confusing.	We have removed the 'Countywide Priority' label from the 'Strategic Priorities' section but retained the identification of 'National Priorities'. This means we can remove the term 'Kent-wide' and identify those schemes as 'Countywide' instead. Priorities in each district/borough have been identified as 'Local Priorities' so there is a clear distinction between 'Strategic',

	'Countywide' and 'Local' levels in the Plan.
You should make the scale of the reductions in highway maintenance budgets clear.	We have stated how the scale of reductions makes an impact on service unavoidable.
The aviation policy section needs updating.	This has been updated following the Government's announcement of a preference for a third runway at Heathrow. It also includes support for improved rail access from Kent to the London airports.
We should not refer to any future use on the Manston Airport site until this is determined in the planning process.	We have made it clearer that the future of the site is yet to be determined.
There needs to be more emphasis on Public Rights of Way.	We have included the Public Rights of Way network as a 'Countywide Priority'.
The map for 'Cross-District Transport Priorities' is unclear.	We have changed this page so each project is clearly explained with examples of what they are delivering.
You should have more information on funding for sustainable transport.	We have updated the funding page to show that the Department for Transport occasionally offer specific funds for sustainable transport, and updated the cross-district priorities to clearly show how we are using funding for sustainable transport.
The 'District Priorities' should show they are KCC's priorities rather than the District or Borough Councils' priorities.	We have reworded the title on each page to be 'Transport Priorities for Sevenoaks' rather than 'Sevenoaks' Transport Priorities', and so on.
Some of the wording introducing each district/borough needs updating.	We have reviewed the wording on each page and included suggestions from the consultation, for example information on rural areas and particular transport difficulties in each district.
There are many suggestions for new transport priorities that should be considered in the Plan at strategic, countywide and local level.	We have considered each of your suggestions and incorporated them into the revised LTP4 where appropriate.
Will the Integrated Transport Programme schemes be assessed against all criteria if they are only targeting one outcome?	We have made it clear that all schemes will be assessed against all criteria so all impacts are scored.

In the Integrated Transport Programme prioritisation methodology the environmental impact should include specific categories.	We have listed the landscape quality and impact on protected landscapes (such as Area of Outstanding Natural Beauty) as guidance.
In the Integrated Transport Programme prioritisation methodology the air quality impact should include where any traffic is relocated by a scheme.	We have specifically listed this possible effect to make sure it's considered in the assessment.
The Plan should include reference to the Equalities Impact Assessment and Strategic Environmental Assessment.	We have included a final statement in the Plan that explains what these assessments are and where they can be found.
Other things need to be considered in the Equalities Impact Assessment and Strategic Environmental Assessment.	All the comments raised have been considered in updating the Equalities Impact Assessment and Strategic Environmental Assessment.



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