SEA Adoption Statement
LTP4 Strategic Environmental Assessment

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1 Background

1.1 Strategic Environmental Assessment Requirements

1.1.1 Strategic Environmental Assessment (SEA) is a process to ensure that significant environmental effects arising from plans and programmes are identified, understood, assessed, communicated, mitigated, monitored and adequately consulted upon by decision makers.

1.1.2 The Strategic Environmental Assessment (SEA) directive was approved by the European Parliament in 2001 and was incorporated into UK law on 20 July 2004 through The Environmental Assessment of Plans and Programmes Regulations (the SEA Regulations). SEA is defined by the European Commission (EC) as: 'an important tool for integrating environmental considerations into the preparation and adoption of certain plans and programmes which are likely to have significant effects on the environment because it ensures that such effects of implementing plans and programmes are taken into account during their preparation and before their adoption'.

1.2 SEA Adoption Statement

1.2.1 The SEA Regulations sections 16.(3)(c)(iii) and 16.(4) require that a 'statement' be made available to accompany the Kent County Council Local Transport Plan, as soon as possible upon adoption of the plan. This statement must contain the following information:

- How environmental considerations have been integrated into the plan;
- How the environmental report has been taken into account;
- How consultation responses have been taken into account;
- Reasons for choosing the Transport Plan as adopted, in the light of other reasonable alternatives dealt with;
- Measures that are to be taken to monitor the significant environmental effects of the implementation of the Transport Plan.

1.2.2   The following table (Table 1) lists the documents produced to date and their purpose:

Table 1: SEA process documents produced for LTP4

Document	Date Produced	Purpose
SEA scoping report	January 2016	The scoping report identified key issues to be covered in the Environmental Report and helped to direct focus of the SEA onto the main issues. The report also defined the study boundary and established the level of detail for the Environmental Report whilst outlining the approach of assessment for each issue identified. The scoping report set out the main tasks for the remainder of the SEA. This information helps all parties to understand what remains to be done, and influences all parties' expectations of the SEA process.
Consultation Draft: Local Transport Plan	January 2016	The Transport Plan sets out how we will improve travel to, within and from the county and contribute to the wider economic, social and environmental objectives of the council. It sets out the long term goals and transport objectives for the county, and the targets and outcomes to show how to deliver the Transport Plan. Kent's Transport Plan has been influenced by the goals contained within the council's Kent Environment Policy & Strategy, UK Air Quality Strategy, AONB Management Plans and the UK Cycling & Walking Strategy. The Transport Plan was consulted on between 8 August 2016 and 30 October 2016.
Consultation Draft: Environmental Report (Rev0)	June 2016	The Environmental Report is the main output of the SEA process. The report has two principal aims: i. To document the SEA process and set out the environmental effects of the plan; ii. Illustrate compliance with the SEA Regulations. The draft Environmental Report (Rev0) accompanied the Local Transport Plan document during the consultation period.
Final Draft: Local Transport Plan	June 2017	The County's adopted Local Transport Plan takes into consideration the comments received during consultation.
Final Draft: Environmental Report (Rev1)	June 2017	The Environmental Report was updated post-consultation (Rev1) to reflect responses in respect of the SEA process, and amendments made to the Local Transport Plan.
SEA Adoption Statement	June 2017	The SEA Adoption Statement acts as an important check on the Local Transport Plan and the SEA process. It helps to ensure that the environment has been considered at every stage, and that the information collated has influenced the final shape of the Local Transport Plan.

2 The SEA process

2.1 Developing the SEA

2.1.1 In accordance with the SEA directive, the SEA documentation has been developed in parallel with the Local Transport Plan. The SEA process can be broken down into five distinct stages as detailed in Table 2.

Table 2: The SEA process stages

SEA Process Stage	Detail
Scoping	Set the context, establish the environmental baseline, identify problems and decide objectives
	Decide the scope of the SEA, develop alternatives and consult with the environmental bodies
Environmental Report	Assess the effects of the plan
	Produce the Environmental Report
	Main consultation on the draft Transport Plan and the environmental report
	Produce statement to accompany final Transport Plan
	Decide what needs to be monitored
	Monitor the significant effects of implementing the plan on the Environment
SEA Adoption Statement	This document; Environmental Considerations; Reasons for choosing LTP4; Monitoring

2.1.2 The SEA was reported in two stages, a Scoping Report that was consulted on in January to February 2016 and an Environmental Report consulted on from 8 August 2016 to 30 October 2016 alongside the Consultation Draft of the Local Transport Plan.

2.2 Scoping Report Stage

2.2.1 The SEA process and the LTP4 began and progressed concurrently in an iterative manner, feeding back environmental and sustainability objectives into the plan. The SEA has been used as a tool for improving the LTP4 formulation process from inception through production to adoption of the solutions included in the LTP4.

2.2.2 Initially, work undertaken for the Scoping Report in establishing the environmental and social, including health, baseline and identifying key environmental and social issues in the county established the SEA objectives. This had implications for the development of the LTP4 and played a key role in developing a set of environmental assessment objectives known as the SEA framework.

2.2.3 The SEA framework also includes objectives to ensure the full integration of the assessment processes of Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA) and Habitats Regulations Assessment (HRA) whilst meeting the requirements of the SEA Directive.

2.3 Environmental Report Stage

Consideration of Reasonable Alternatives

2.3.2 A key element of the SEA process is the assessment of 'reasonable alternatives' to the LTP4. Alternative Options have been considered in relation to funding allocations by which the LTP policy outcomes may be taken forward through the Local Transport Plan review process. Section 4 of the Environmental Report assessed alternatives and should be read in conjunction with this SEA Statement.

2.3.3 Each alternative Option has a different level of emphasis on each policy outcome:

- Economic growth and minimised congestion;
- Affordable and accessible door-to-door journeys;
- Safer travel;
- Enhanced environment;
- Better health and wellbeing.

2.3.4   In developing the Draft LTP4, four Options were considered, the results of which are summarised below:

Option 1 − Retain existing prioritisation methodology from LTP3 and the funding prioritised spatially as well as being unequally allocated among themes GWG 45%; 15% others; 10% life in Kent (in the context of LTP4 policy outcomes).

Option 2 − Use the LTP4 revised prioritisation methodology and equally weight/equally prioritise outcomes − i.e. 20% equal funding allocation.

Option 3 − Use the LTP4 revised prioritisation methodology and give a priority order to the outcomes and weight them differently − i.e. 40% Outcome 1; 15% other outcomes.

Option 4 − Use the LTP4 revised prioritisation methodology and give a priority order to the outcomes and weight them differently − i.e. 55% Outcome 1; 0% Outcome 3; 15% other outcomes.

2.3.5   These Options were assessed against the SEA framework and the assessment identified the extent to which the proposed strategic options were considered to encourage positive environmental outcomes. The assessment results are summarised below in Table 3 and presented in full in Appendix E of the Environmental Report.

2.3.6   A qualitative assessment has been made based on perceived short or long term improvements or regressions for each SEA objective. To support the assessment findings, the options have been ranked in terms of their environmental performance against each theme, and the relative merits of each option.

2.3.7   Option 2 performs more favourably than Options 1, 3 and 4 in terms of providing improvements to the SEA themes and/or to meeting the SEA objectives. With a focus on shared economic, social and environmental features, it is considered that this approach will deliver wider beneficial outcomes for air quality, greenhouse gas emissions and residents' quality of life and health and wellbeing through more effectively addressing issues related to congestion, accessibility and modal shift.

2.3.8   It is acknowledged that the main focus of LTP4 is 'Delivering Growth without Gridlock'. It is therefore accepted that KCC's preferred Option 3 − which delivers greater funding for Outcome 1, − is an appropriate choice for the funding allocation as it does not cause significant negative impacts on the SEA Objectives.

Table 3: SEA framework objectives and the assessment of the proposed LTP Options

Plan Options	Biodiversity	Air Quality	Health	Climate	Population	Water	Heritage	Landscape	Noise	Materials	Technology & Innovation	Overall	Comments
	Protect and enhance the county's habitats, biodiversity levels, and species of international, national, regional and local importance.	Improve air quality in urban areas and achieve the NAQS and AQMA objectives across the county.	Support transport solutions that promote positive health outcomes through active and sustainable travel choices and improved road safety.	Reduce vulnerability to climate change-related extreme weather events by creating a resilient transport infrastructure and identifying appropriate adaptation and mitigation measures.	Promote accessible, integrated and sustainable transport networks that support the needs of the economy and local communities	Coordinate across the county in parallel with other planning policy, in order to address water catchment quality and resource issues.	Protect and enhance cultural heritage, and access to areas and features of historic, architectural or archaeological importance.	Enhance and protect the character and diversity of all landscape assets through planning and policy decisions and ensure development does not decrease visual and recreational amenity	Seek to reduce noise at source, particularly in existing Noise Important Areas, and to prevent the creation of new Noise Important Areas; protect tranquil areas from impact, including cumulative impact.	Maximise resource efficiency in materials, energy, waste and water use by utilising sustainable construction and procurement methods, and ensuring appropriate ongoing maintenance of	Apply innovative and technological approaches to achieving sustainable outcomes.		
What will be the situation without LTP4 - Option 1: Business as usual – i.e. retain existing prioritisation methodology from LTP3 and keep the funding prioritised on growth points and growth areas as well as being unequally allocated among themes (in the context of LTP4: outcomes). GWG 45%; 15 others; 10 life in Kent	-	-	+	0	0	-	0	-	-	+	++	-2	Option 1's emphasis is housing and employment within the county to support GWG. Having this as a key independant theme by-passes the opportunity to develop sustainable solutions to support GWG (other than by CBA). The funding assessment methodology provides for spatial analysis, although this is based on the theme of LTP3 and therefore is not holistic. The CBA provides very limited ability for consideration of the environment. Funding to key growth points in the county will lead to increased environmental pressures on all areas of the environment will increase. The option does address wider social and commnuity needs in the improved access to non-vehicular travel. The theme for the environment relates primarily to climate change - which is a far-reaching subject in terms of the schemes that could support it. The main issue is the limited spatial distribution of the schemes, leading to an all or nothing outcome for areas. Top slicing of the budget for safety related schemes means that less budget is available for other themes as a wholes. This is despite there being a dedicated theme for safety.
What will be the situation with LTP4 - Option 2: Use the revised prioritisation methodology and make all outcomes equally weighted and of equal priority – i.e. equal allocation of funding. 20% each	+	+	++	+	++	+	+	+	+	+	++	14	Option 2 is a progression from Option 1, developing the issues found into solutions. Because the assessment scheme uses the themes in LPT4, each area is addressed. Funding is allocated to schemes based on their theme. Funding allocation is equalised - the environment based schemes benefits from a 5% increase (20% total) in allocation.Additionally, Outcome 2 has strong environmental and social benefits and so a 20% funding allocation to outcome 2 benefits outcome 4. Revised assessment scheme allows for consideration of the environment for each scheme. The impact of increased funding for economic growth may or may not have a residual negative impact - this will depend on the scoring for Outcome 4, whch may well be high. Scheme design will play a role in deciding the Outcome scores.
What will be the situation with LTP4 - Option 3 [preferred by KCC & captured in the LTP4 Draft for Cabinet Cttee] : Use the revised prioritisation methodology and give a priority order to the outcomes and weight them differently – i.e. more available funding for some outcomes (an alternative funding allocation). 40% ec; 15 others.	0	+	+	+	+	0	0	0	0	0	++	6	Option 3 is a progression from Option 2, developing the issues found into solutions. Because the assessment scheme uses the themes in LPT4, each area is addressed. Funding is allocated to schemes based on their theme. Funding allocation is equalised - the environment based schemes benefits from a 15% funding allocation. Revised assessment scheme allows for consideration of the environment for each scheme. The impact of increased funding for economic growth may or may not have a residual negative impact - this will depend on the scoring for Outcome 4, whch may well be high. Scheme design will play a role in deciding the Outcome scores.
What will be the situation with LTP4 - Option 4: Use the revised prioritisation methodology and give a priority order to the outcomes and weight them differently – i.e. more available funding for some outcomes (an alternative funding allocation). 55% ec; 15 others; 0 safety (as CRM already top sliced)	-	0	-	-	0	-	-	-	-	+	++	-5	Option 4 is a progression from Option 2, developing the issues found into solutions. Because the assessment scheme uses the themes in LPT4, each area is addressed. Funding is allocated to schemes based on their theme. Funding allocation is equalised - the environment based schemes benefits from a 5% increase in allocation. Revised assessment scheme allows for consideration of the environment for each scheme. The impact of increased funding for economic growth may or may not have a residual negative impact - this will depend on the scoring for Outcome 4, whch may well be high. Scheme design will play a role in deciding the Outcome scores. Outcome 3 'Safety' delivers little in environmental benefits and therefore a reduction in the funding allocation for Outcome 3 raises the amount available for Outcome 4 'Environment'. However, the allocation for Outcome 1 'Growth' has benefited directly from the lack of funding for Outcome 3 and this has the strongest negative effect on environmental outcomes.

Assessment of the Local Transport Plan

2.3.9 The ambition and outcomes for LTP4 are:

"To deliver safe and effective transport, ensuring that all Kent's communities and businesses benefit, the environment is enhanced and economic growth is supported"

Outcome 1: Economic growth and minimised congestion

Policy: Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population.

Outcome 2: Affordable and accessible door-to-door journeys

Policy: Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.

Outcome 3: Safer travel

Policy: Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.

Outcome 4: Enhanced environment

Policy: Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.

Outcome 5: Better health and wellbeing

Policy: Provide and promote active travel choices for all members of the community to encourage good health and wellbeing, and implement measures to improve local air quality.

2.3.10   These LTP policies have been assessed as part of the SEA and are presented in full in Appendix G of the Environmental Report.

2.3.11   Strategic Transport Priorities have been proposed within LTP4, some of which are of national significance. These have been assessed as part of the SEA and are presented in full in Appendix H of the Environmental Report.

2.3.12   LTP4 also details a number of countywide priorities which equate not only to individual schemes or areas, but to Kent's existing transport strategies:

- Road Safety;
- Highways Maintenance & Asset Management;
- Home to School Transport;
- Active Travel;
- Public Rights of Way;
- Sustainable Transport; and
- Aviation.

2.3.13   With the exceptions of Aviation (scoped out) and Sustainable Transport (which overarches the cross-district priorities detailed below), the above have been included within the scope of the SEA and results of the assessment are presented in Appendix H of the Environmental Report.

2.3.14   Local priorities – the infrastructure required to support growth in each district –are not listed exhaustively within LTP4, and it is not clear as to whether and when funding will be made available to any of this broad range of potential schemes. It has therefore not been possible to undertake Strategic Environmental Assessment of these local priorities. Environmental assessment will be undertaken on a scheme by scheme basis; and schemes will be subject to prioritisation when suitable funding sources are identified.

2.3.15   A number of local schemes, targeted at sustainable transport and including initiatives to encourage modal shift, will deliver benefits across district boundaries. Details of these have been expanded on in LTP4 post-consultation, identified as 'Cross-District Priorities'. Many of these schemes have already secured funding. As a result of this – and due to their focus on achieving sustainability objectives – these have not been included within the scope of the SEA.

2.3.16   Table 4 provides a summary of how the SEA process and the Environmental Report helped to improve the Local Transport Plan. Mitigation measures were identified if the Transport Plan was considered to have adverse environmental effects (none of which were predicted to be significant).

Table 4: How the SEA influenced the Local Transport Plan

SEA Issue	Summary of effect of Transport Plan on SEA topic area	The SEA helped to improve the Transport Plan by making the following changes
Biodiversity, flora & fauna	No significant detrimental effect on biodiversity, the potential for minor (non-significant) negative effects remains	Mitigation will require the topic to be considered early and holistically, with proper ecological impact assessment and HRA, and with both mitigation and enhancement being prioritised in scheme development
Air Quality	No detrimental effect on air quality and could contribute positively	Reduced congestion and modal shift to sustainable and active travel are key to these predicted improvements; these are not easy to achieve in practice therefore the implementation of LTP4 will be central to determining success. It is likely that vehicle traffic will increase in parallel with the growing population, creating a shifting baseline within which that any positive changes could easily be hidden
Human Health	Will not have a detrimental effect on human health and could contribute positively	The potential for health benefits to arise due to improved safety, reduced noise and air pollution, improved local environments and the adoption of healthier lifestyles is noted; although overcoming the inertia of current travel choices and achieving modal shift to active and sustainable options is a key challenge for LTP4 to face.
Climatic Factors	No effects of LTP4 were assessed as being negligible, minor or major negative. It is therefore concluded that LTP4 will not have a detrimental effect on climatic factors	The resilience of schemes and their environs will depend on the use of sustainable design to future-proof both the network and the surrounding area in terms of rainfall, heat and flooding. Decreasing Kent's carbon footprint in the face of increasing traffic resulting from a growing population is a significant challenge, and modal shift plus the use of 'green' technology will need to be central to LTP4's approach

SEA Issue	Summary of effect of Transport Plan on SEA topic area	The SEA helped to improve the Transport Plan by making the following changes
Population	Assessed as neutral overall for the impact on population, albeit with some positive elements identified in the increased access and connectivity proposed by the Strategic and Non-Strategic schemes	Some positive elements identified in the increased access and connectivity proposed by the Strategic and Non-Strategic schemes
Water	LTP4 will not have a significant detrimental effect on water, the potential for minor (non-significant) negative effects remain	Reduction in likelihood of pollution incidents which could arise from increasing the proportion of sustainable travel modes
Cultural Heritage	While LTP4 will not have a significant detrimental effect on cultural heritage, the potential for minor (non-significant) negative effects remain	Elements such as improved access to sites, and protection of heritage features resulting from potential improvements to air quality
Landscape	Will not have a significant detrimental effect on landscape, the potential for minor (non-significant) negative effects remain	Minor positive elements such as improved access to sites, and enhanced visual amenity
Noise & tranquillity	Will not have a significant detrimental effect on noise and tranquillity, the potential for minor (non-significant) negative effects remain	Prioritisation of sustainable and active transport modes which have lower noise emissions, and focus on some areas of deprivation and thus potential to reduce environmental inequality
Material assets	Some positive elements potentially arising from prolonging asset life and reducing maintenance costs by achieving modal shift to sustainable travel	The opportunity to promote the use of sustainable materials and supply chain and more broadly the drive to reduce the environmental footprint of Kent's transport
Innovation & Technology	LTP4 could contribute positively to the development and use of environmental innovation and technology – providing the topic is considered early and holistically in scheme development	Some positive elements such as the use of asset management systems for highways maintenance, and the promotion of sustainable travel smartphone applications

3   Consultation

3.1   Requirements

3.1.1   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 organisations and the wider public. Further information is provided below.

3.2   Scoping Report

3.2.1   The Scoping Report was the subject of consultation from January to February 2016. The report detailed:

- The plans, policies and programmes relevant to the LTP4;
- 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; and
- The assessment process ("The SEA Framework").

3.2.2   The following stakeholders were consulted on the SEA Scoping Report

- Kent Downs AONB Unit
- Kent High Weald Partnership
- Medway NHS Trust
- Medway Council
- Districts: Sevenoaks, Gravesham, Dartford, Maidstone, Ashford, Canterbury, Tonbridge & Malling, Tunbridge Wells, Swale, Shepway, Thanet, Dover
- Environment Agency
- Historic England
- Natural England

3.2.3   Comments received from the Scoping Report consultation are summarised below in Table 5.

Table 5: Comments from the Scoping Report statutory consultation

Author	Comment	KCC response
Swale Borough Council	It would be useful here to explain the relationship between LTP4 and Local Transport Strategies as well as the relationship with Local Plans themselves and the and the SA processes for those plans	Response sent through email
Swale Borough Council	Define NO2 and PM10 here	Changed
Swale Borough Council	Figures 3 and 4 completely miss the AQMAs for Swale Borough Council. This needs to be corrected and any consequent adjustments to 2.2.3 made. Are AQMAs from other LAs also missing?	Query resolved with Amey – scale of drawing means AQMAs not visible but are included
Swale Borough Council	Isn't increasing population and more road vehicles likely to mean that this level will go up?	Changed
Swale Borough Council	Does this include the A2 in Swale?	Accepted comment – no change required
Swale Borough Council	This sentence seems a little vague – more than what?	Changed
Swale Borough Council	I think 3 SMPs are relevant – 1. Medway Estuary and Swale 2. Isle of Grain to South Foreland and 3. South Foreland to Beachy Head Font size is smaller in this paragraph	Changed Changed
Swale Borough Council	Should another objective be to repair pot holes etc, caused by extreme weather events etc, more quickly?	Disagree – All potholes regardless of cause have SLA
Swale Borough Council	2.5.5 Addition: "and between the County, Local Planning Authorities and other agencies and organisations".	Accepted
Swale Borough Council	The issues of Best and Most Versatile Agricultural Land is not addressed in the section, but is a big issue for Swale in allocating sites for development and it would be appropriate to make reference to it here, including the economic value of this land and soils in general.	Safeguarding our Soils added as a data source and reference to agricultural land added in 2.6.3.

Author	Comment	KCC response
Swale Borough Council	The CPRE may have more up to date data on this – may be worth checking? A section seems to be missing here	Email sent to CPRE - Up to date maps not available yet Under drawing
Swale Borough Council	Are the economic impacts of adequate transport infrastructure or lack of them adequately covered in this report?	Disagree – This is purely about the environmental impacts and not the economy
Kent Downs AONB unit	It is amended to include reference to the Countryside and Rights of Way Act 2000, which at Section 85 requires all statutory undertakers in carrying out their duties to have regard to the purpose of conserving and enhancing Areas of Outstanding Natural Beauty. This is applicable to Kent County Council as highways authority.	Included in section 2.9.2 - Section 85 of the Countryside and Rights of Way Act 2000 requires all statutory undertakers in carrying out their duties to have regard to the purpose of conserving and enhancing Areas of Outstanding Natural Beauty. This is applicable to Kent County Council as Highway Authority.
Kent Downs AONB unit	In addition, it would also be appropriate to include reference to the Kent Downs AONB Management Plan 2014 to 2019 and the Kent Downs AONB Rural Streets and Lanes – a Design Handbook, both of which have been adopted by Kent County Council. These documents could be included under either the Data Source Section at Section 2.9 or the Policy Section at 2.9.2.	In order to support the conserving and enhancement of areas of outstanding natural beauty within the county, supporting policy has been created through the Kent Downs AONB Management Plan 2014 to 2019 and the Kent Downs AONB Rural Streets and Lanes.
Natural England	We support your recognition that "it is important to retain connectivity of existing habitats within the LTP area and reduce fragmentation of habitats where possible".	Comment noted
Natural England	The recognition that the "main ways in which the existing transport network may impact on biodiversity and wildlife are pollution in the form of noise, air and water contaminants" is welcomed. It would be helpful to map existing conditions for these tree themes where this is possible.	Noted
Natural England	The Kent Minerals and Waste Local Plan HRA seemed to be based on good data. It would be helpful if some of that data on traffic levels, pollutant deposition rates and critical loads – particularly for sensitive sites approaching their critical levels and loads -could be used to inform consideration of the air quality implications of changes outlined in the LTP. Similarly for water, noise, light etc.	Noted
Natural England	Seems pessimistic. The challenges are significant, however the condition and direction of travel of SSSIs is generally heartening and plans, land managers and partners should respond to the challenge set out in NPPF - to halt the decline in biodiversity	Noted

Author	Comment	KCC response
Natural England	The opportunities set out here are supported. In practice, the key route (for the first bullet point) would be through measures such as avoiding areas rich in habitats and the stepping stones and corridors that link them. Where the best alternative is likely to result in losses, early consideration of adequate mitigation and compensation is essential. Good data (as recognised by para 2.1.6) is essential.	Noted
Natural England	Focuses on air quality and human health, however there are clear threats to the natural environment arising from airborne pollution (noted earlier in the SEA scoping document). The APIS website provides a wealth of data on this matter.	Noted
Natural England	Landscape considerations and the use of NCAs are welcomed (section 2.9). Some use of Landscape Character Assessment and Landscape and Visual Impact Assessment is important in the early stages of considering any new significant infrastructure Para 2.9.3 indicates that any type of new transport infrastructure or expansion of existing infrastructure "has the ability to significantly affect the landscape through many different ways such as land take, visual intrusion, light pollution and loss of tranquillity". We welcome commitment in para 2.9.5 that LTP4 should aim to value, enhance and protect natural environmental assets including AONBs, historic landscapes, open spaces, parks and gardens and their settings.	Noted
Maidstone Borough Council	The LTP4 SEA Scoping Report sets out the data sources and background information for each of the 11 environmental topics, and this provides the evidence to take forward 10 of these topics for assessment in the SEA's Environmental Report. Opportunities for LTP4 to positively impact the situation for each topic are also concisely presented.	Noted

Author	Comment	KCC response
Maidstone Borough Council	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. 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.	Noted Noted
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.

3.3 Environmental Report

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

  i. Draft Environmental Report (Rev0) – published alongside the Draft LTP4 for public consultation; and

  ii. Final Environmental Report (Rev1) – published alongside the Final LTP4.

3.3.2   The Draft Environmental Report and Draft LTP4 were the subject of public consultation from 8 August 2016 until 30 October 2016. The Draft Environmental Report, which included the information contained in the Scoping Report and supplementary assessments in the form of EqIA, HIA and HRA, 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.

3.3.3   A range of stakeholders were consulted including statutory consultees (as detailed in 3.2.2), and community engagement was encouraged through the use of adverts in local print media and on the KCC website. Full details of the consultation can be found in the KCC Consultation Report at: www.kent.gov.uk/localtransportplan

3.3.4   Table 6 below shows the responses received from the statutory consultees in response to the consultation on the Environmental Report and the draft Local Transport Plan. The consultation results were used to amend both documents.

Table 6: Statutory consultee responses to the Environmental Report

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.	Identified in SEA Opportunities – reflected in 'Protect and Enhance' SEA Objective. Detailed consideration to be given in design stage; LTP4 priorities are too undeveloped to make specific design commitments at present.
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.	Identified in SEA Opportunities – reflected in 'Protect and Enhance' SEA Objective. Detailed consideration to be given in design stage; LTP4 priorities are too undeveloped to make specific design commitments at present.
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.	Identified in SEA Opportunities – reflected in 'Protect and Enhance' SEA Objective. Detailed consideration to be given in design stage; LTP4 priorities are too undeveloped to make specific design commitments at present. This is not a KCC project but KCC are working to ensure its negative environmental impacts are reduced or mitigated and that consideration is given to legacy projects that have a biodiversity gain. Highways England will set their own biodiversity / environment project goals.

Summary of Comments	Action Taken
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 H;	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 movements 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. The impact on sensitive ecological receptors for road schemes are considered through the Environmental Impact Assessment process.
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?	All sites currently in exceedance of the NAQ objectives must be subject to establishment of an AQMA. The presence of an AQMA therefore indicates an area of significant air pollution, in which an Air Quality Action Plan has set targets to manage and reduce the impact on all sensitive receptors.
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.	Ramsar sites have been included in the HRA. They are co-located with the SPA's.

3.3.5   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.

3.3.6   Feedback was received from over 500 individuals and organisations; many of the comments were in agreement with the draft LTP4, especially the ambition, outcomes and supporting policies. Stakeholders, including the district and borough councils, were broadly supportive of the draft LTP4 but also made a range of comments relating to their specific area of interest.

3.3.7   Full details of the consultation can be found in the KCC Consultation Report at:

www.kent.gov.uk/localtransportplan

A summary of these 500 consultation responses is available in KCC's document, "You Said, We Did - How your views helped to shape our Local Transport Plan 4: Delivering Growth without Gridlock (2016-2031)", reproduced in Table 7, below.

Table 7: Summary of consultation responses on draft LTP4

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.

Comment	Action carried out
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.

Comment	Action carried out
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.

4   Monitoring

4.1.1   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).

4.1.2   Monitoring the impacts of LTP4's implementation is therefore not required by the legislation because no significant negative effects have been predicted as a result of this Strategic Environmental Assessment. It can be noted that the Kent Environment Strategy forms a framework for the monitoring of relevant targets and indicators, and Kent is committed to producing an annual State of the Environment Report.