

6 STRATEGIC ENVIRONMENTAL ASSESSMENT

- 6.1 The councils are required by European Directive (2001/42/EC) to undertake an environmental assessment of all plans and strategies that are likely to have significant environmental implications. To complement the EC Directive, the government has produced guidance on Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA), which advocates the use of an objective-based appraisal process. The process integrates environmental and broader sustainability considerations into decision-making at an early stage and throughout plan development. The guidance sets out the SEA topics used, which include Biodiversity (fauna & flora), Water & Soil, Population and human health, Air, Climatic factors, Material assets, Cultural heritage and landscape. The SA also includes social inclusiveness and economic growth.
- 6.2 One of the challenges facing the councils is how to accommodate growth in housing and employment while protecting and enhancing the existing environment, and also how to ensure that the existing and new communities are able to benefit from the additional infrastructure and services which will come into the conurbation. Table 4.3 identifies the environmental threats and opportunities associated with the growth of the area.
- 6.3 To accommodate the needs arising from the level of development proposed it will be necessary to provide new schools, social/healthcare and community facilities, as existing facilities will be insufficient to cope with the level of growth. The new communities will need to be designed to ensure that access to jobs, health, education, shops and leisure/community facilities is easily achievable in a sustainable manner through extended public transport, cycling and pedestrian infrastructure. Unless adequate transport is in place when these developments go ahead, they will not be sustainable and the existing transport network will be unable to accommodate the traffic generated. The environmental impact of the growth of these areas will also need to be carefully managed because much of this development will be on 'greenfield' areas to the north of the conurbation.
- 6.4 The approach recommended in ODPM's draft guidance relating to carrying out of the SEA and SA breaks the process down into five stages. The first two stages provide the scoping and the development of alternative scenarios against which to measure the draft plan's environmental impact. The third and fourth stages involve the production of and consultation on the draft Environment Report and the fifth stage involves annual

monitoring. For the SEA one overarching Scoping Report and Environment Report have been prepared to cover both this LTP2 and the second Bedfordshire and Market Towns LTP. This approach has been possible because the SEA assesses the environmental implications of collective transport strategies rather than individual schemes and policies, and many of the principles identified are not location specific to Bedfordshire or Luton.

The Environmental Scoping Report

- 6.5 The SEA of the LTP2 began with the production of the Scoping Report, published in April 2005 as a joint report for both the Bedfordshire and Luton Dunstable Houghton Regis LTP2's. The SEA Scoping Report starts from the premise that Bedfordshire and Luton would have to plan for prolonged and sustained growth as a result of its status as a Growth Area. It sets out the scope of the SEA process, including definition of the objectives and assessment criteria, which focus on those issues directly relevant to both LTP2s but also take account of the key sustainability objectives presented in the "Sustainable Development Framework for the East of England" published by EERA in October 2001. The Scoping Report also outlines the baseline environmental information, key elements of which are summarised in Chapter 2.
- 6.6 During May 2005 the Borough and County Councils carried out a joint consultation on the SEA Scoping Report. This was circulated to the statutory consultees (Environment Agency, English Heritage, English Nature, Countryside Agency), although to obtain a diverse and comprehensive range of responses the views of a number of other local agencies were also sought, including those with a responsibility for:
- the environment (The Wildlife Trust and CPRE);
 - health and wellbeing (Primary Care Trust and social services);
 - education and training (Learning Skills Council); and
 - Economic Development (Chamber Business, Bedfordshire and Luton Economic Development Partnership).
- 6.7 Comments were received from a range of Statutory consultees as well as local interest groups. The full range of comments will be used in the production of the Environment Report and to refine the targets and indicators for the SEA. However there were a number of comments received that are relevant to the LTP2 and these are summarised below:
- agree with the assessment of baseline environmental conditions;

- consider that the strategy options are realistic, although some felt that no housing development should take place until the supporting transport and other infrastructure is in place; and
- consider that all developers and planners should take a sustainability balance sheet approach to replace any land of ecological importance lost to development, as part of an overall greenspace strategy

The Draft Environment Report

6.8 The draft Environment Report was published in December 2005 and formed the basis of a second round of consultation with the Statutory bodies and other stakeholders with an interest in environmental and sustainability issues. A summary leaflet was also published for wider public consultation. The revised Environment Report is submitted alongside this final LTP.

6.9 The draft Environment Report develops and assesses the impacts of the four alternative options for the management of transport in the conurbation both for the next 5 years up to 2021 and sets down a number of mitigation measures to minimise any adverse environmental impacts. The four options considered are strategic and cover broad policy direction and have been assessed against the appraisal criteria developed in the Scoping Report. The four options, together with key aspects of their assessment, can be summarised as follows:

Option 1

6.10 Based on the continued implementation of strategies and measures planned in earlier versions of the LTP and other adopted plans and programmes and assumes that new strategies or measures will not be implemented. Considering the level of anticipated growth, this option scores poorly relative to Options 2 and 3, reflecting the limited protection for the environment. In particular this option results in worsening air quality, and noise, together with negative impacts on heritage and landscape.

Option 2

6.11 This Option enables high-level growth to be accommodated in a planned and sustained way, in accordance with the government's Principles of Sustainable Communities in terms of balanced communities and mixed land use. This assumes planned infrastructure (transport, healthcare, education, leisure and shopping facilities) to be in place in advance of

development, with access to these services by sustainable modes of transport. Option 2 scores positively against the majority of the sustainability criteria, particularly in relation to improved public health, quality of public transport, safety, improved cycling and pedestrian environment, accessibility and community inclusion.

Option 3

- 6.12 This builds on Option 2, with planning for high levels of public transport, walking and cycling measures. It also assumes the use of demand management, including parking restrictions and investigation of fiscal disincentives particularly for car travel. This Option will have similar positive impacts to that of Option 2, but scores higher in relation to biodiversity, modal shift away from the private car, accessibility to public transport, reliability of public transport, historic environment, reduction in traffic flow and reducing congestion.



NCN 6 crossing the busy Stockingstone Road roundabout in Luton

Option 4

- 6.13 This also builds on Option 2 but takes a policy stance of unmanaged growth and unrestrained car growth. It would feature continued reliance on car-based transport over the short term with the emphasis on road building and limited investment in infrastructure for alternative modes of transport. This Option could improve accessibility to facilities, but has a negative impact on the environment and sustainability including diminishing quality of life in terms of air quality, noise, impacts on the historic environment, landscape and accessibility to public transport.

Preferred Option

- 6.14 Overall Options 2 and 3 perform best. However there are concerns over some aspects of the feasibility of Option 3, in terms of cost of delivering the public transport infrastructure and the public acceptability of abandoning the private car for public transport. A strategy of LPT2 comprising a combination of Option 2 and Option 3 will have the most positive cumulative effects for the conurbation.
- 6.15 The preferred Option focuses on the principles of long-term investment in improving public transport (including park & ride), accessibility to local facilities and use of new technology, complemented by demand management measures in "hot spots". The significant positive effects of Options 2 and 3 include:
- Limiting the growth of traffic related greenhouse gas emissions.
 - Improvement in local air quality.
 - Reduction of car based work and leisure journeys.
 - Reduction of social exclusion.
 - A reliable and high quality public transport system.
 - Increase in the overall quality of life.
 - Increase in human health due to the availability of pedestrian paths and cycle lanes.
- 6.16 Comments on the draft Environment Report were received from a range of Statutory consultees as well as local interest groups. The full range of comments will be used in the producing the final Environment Report, but some are relevant to the LTP2 and these are summarised below:
- Support preferred Option based on sustainable transport modes (public transport, walking and cycling) and implementing school/employee travel plans;
 - Concern that demand management at hotspots conflicts with need for improved accessibility to support economic growth
 - Measures to reduce noise in sensitive areas and improve landscape, biodiversity and heritage should be accommodated in the LTP where these relate to transport. Also recognise need for improved design guidance in considering and mitigating these environmental impacts.

How The SEA Has Influenced The LTP2 Strategy

- 6.17 The preferred Option that has emerged from the Strategic Environment Assessment (described above) relates closely to the objectives of the long-term 2020 transport strategy, in that it integrates the transport and land use development associated with the growth of the area to ensure that it encourages access to existing and new facilities within the conurbation by travel by public transport (including park and ride) walking and cycling.



View of Fallowfield County Wildlife Site from NCN 6

- 6.18 Performance of the preferred Option can be further enhanced through the application of a range of mitigation measures that are set out in the Environment Report that accompanies this LTP2 submission. These mitigation measures broadly fall into two categories:
- Measures to improve accessibility to local facilities and the safety/security of all transport users, and initiatives such as school and work travel plans to reduce the impact of the private car
 - Policies in the design and implementation of transport schemes that can reduce their environmental impact.
- 6.19 The first of these categories is largely encompassed by the various interventions and initiatives under the four shared priority areas and is described further in Chapter 8. Further details of the strategy interventions to minimise these impacts are described in Chapters 9-13. The second category includes a number of actions that can be taken to minimise the impact of transport infrastructure on the environment, as set out in the following LTP2 environmental guidance.

LTP2 Environmental Guidance

The councils will reduce the environmental impact of transport infrastructure by:

- i) considering all relevant environmental impacts for new major transport schemes
- ii) developing specific design guidance to be used in scheme design/implementation; and
- iii) applying, where practical, the following environmental management principles to the design and implementation of all new transport schemes.
 - ❑ Include measures to ensure that transport infrastructure avoids damage to sensitive areas that are important for nature conservation, with full compensation for any unavoidable effects and encourage the creation of new habitats for biodiversity and, where appropriate, creating new habitat linkages.
 - ❑ Ensure that access to designated wildlife/conservation sites and the open countryside is achieved by a range of modes of transport, by creating green corridors and bridges where appropriate. Where opportunities exist for or green corridors it is recommended that these are implemented.
 - ❑ Ensure that new transport infrastructure is designed to minimise the possible impact of storm water run-off on water courses.
 - ❑ Implement sustainable drainage systems in order to reduce flood risk as well as minimising diffuse pollution and maintaining natural flow regimes.
 - ❑ Promote sustainable design and construction practices including the minimisation of construction waste and use of local materials, recycled highway materials - especially in regeneration areas where there is an increase in potential to use demolition materials.
 - ❑ Ensure that new transport infrastructure/routes avoid areas of archaeological interest. Where transport development does take place in such areas, or archaeological discoveries are made during construction, ensure all necessary measures are taken to preserve items found.
 - ❑ Ensure that new transport schemes have minimal impact upon Listed Buildings, Conservation Areas and Ancient Monuments.
 - ❑ Ensure that new transport infrastructure has minimal impact upon the landscape in which it is situated.
 - ❑ Ensure that new transport schemes should use visual screening and planting.
 - ❑ Incorporate design measures to reduce impact of street clutter on landscape and cultural heritage.



Example of a good quality Victorian building in Luton town centre conservation area