

Annex 1

SEA Scoping Report Comments and action following consultation

This Annex contains a register of comments that were received during the consultation period on the draft Derbyshire Local Transport Plan: SEA Scoping Report. A total of nine responses were received. The following tables are structured around the Chapters of the SEA Scoping Report

Chapter 1 Introduction and Consultation Questions

Ref	Page/ Para	Consultee Suggested change/ Comment	Officer Comment	Action	Consultee
4.7	1-7 Figure 1.1	In Bolsover District only Bolsover and Shirebrook are shown. The Council's settlement hierarchy has 4 towns: Bolsover, Shirebrook, Clowne and South Normanton. If possible, it would therefore be appreciated if the plans could be amended to show the status of towns in Bolsover. Similarly the district has five main villages: Barlborough; Pinxton, Creswell, Tibshelf and Whitwell. Again if possible it would be useful if the main villages could be treated consistently.	Agree	Figure amended	Ref LTP3SEADSR4
7.1	1-7 Figure 1.1	We note that Figure 1.1 contains the main rivers but consider that it should also include BW's canal network within Derbyshire, as these inland waterways also form a part of the transport network and waterways and towing paths play an important role in widening choices for cycling, walking, freight and public transport.	Agree	Figure amended	Ref LTP3SEADSR7
8.1	1-3 Para 1.2.7	We welcome the approach of distilling key messages from appropriate documents, particularly as the relevance of some of these is under review by the coalition government, not only national policy but also regional policy which should be added	Agree	Text amended	Ref LTP3SEADSR8
1.22	1-8 Para 1.4.1	Habitats Regulations 1994 have been replaced by the Conservation of Habitats and Species Regulations 2010	Acknowledge new Regulations and update text	Text amended	Ref LTP3SEADSR1

Chapter 2 Scope and key SEA stages

Ref	Page/ Para	Consultee Suggested change	Officer Comment	Action	Consultee
2.1	2-7 Objectives	I support draft SEA objectives SEA 10 and SEA 13	Noted	No Action	Ref LTP3SEADSR2
8.15	2-7 Objectives	There are 23 SEA objectives, some of which overlap and duplicate. For example SEA objectives 1,3-5 are about protection of special landscapes/ townscape. In addition, as noted above, in order to meet the principles of the ELC the landscape objectives must address all landscapes. SEA objective 2 does not do this adequately. We suggest that two objectives would suffice. SEA1 Protect and enhance all landscapes, townscapes and the historic and natural environment from the impact of traffic, transport infrastructure and light pollution SEA2 Help preserve remoteness and tranquillity within the Peak District National Park and other areas of tranquil countryside (As SEA 5) SEA objectives 6 and 7 for biodiversity could be rolled into one: protect and enhance nature (biodiversity, geodiversity, wildlife flora and fauna according to the IUCN definition) and to take measures to reduce habitat fragmentation The proposed DCC LTP3 SEA objective 10 would not explicitly test the underlying cause of CO2 emissions – absolute traffic growth. Furthermore traffic, even if not emitting greenhouse gases, still has adverse impacts of people and the environment. We propose that SEA14 which only focuses on location to reduce the need to travel should be replaced by 'to reduce motorised traffic growth through a combination of demand management measures, land use planning and	A review of SEA objectives will be undertaken following the Scoping Report as part of Stage B of SEA. All comments have been taken on board and will be included within the new set of objectives.	Use comments to finalise set of SEA objectives	Ref LTP3SEADSR8

		<p>encouragement of the use of alternative transport modes'. In order to meet the statutory target for at least 80% reduction in greenhouse gas emissions by 2050 when compared to 1990 levels, domestic transport must reduce its greenhouse gas emissions by at least 16% of 2005 levels by 2020. Reductions of 15% on today's traffic levels are required to catch up with these challenging targets.</p> <p>SEA objectives 13-23 address population and human health including noise.</p> <ul style="list-style-type: none"> • SEA 17 and 18 could be combined: Improve access to key services and facilities using sustainable modes of transport, particularly considering the needs of elderly people • Community and individual health could be addressed through a SEA objective that combines SEA 19-21 reduce road danger and encourage walking and cycling in order to increase community and individual safety, improve health and reduce crime and fear of crime • SEA 22 should include the impact of vibration and make it explicit that the noise and vibration impacts to be minimised are on people, the built and natural environment. Many villages endure significant volumes of HGVs which cause significant vibration <p>SEA12 captures energy usage and SEA 15 use of recycled/ reused materials but an overarching SEA objective to minimise the use of environmental resources should be considered. This would fit with the ecosystem services approach, encourage the adoption of an environmental capacity approach by LTP3 and make it implicit that we need to consume less. The focus of the Scoping report should be on environmental limits and individual well-being. This would increase the likelihood of reducing greenhouse gas emissions and managing the environment for sustainable outcomes.</p> <p>LTP3 needs to focus on people and their travel decisions rather than networks and modes. SEA 2 maintains the transport asset for local travel and SEA17 recognises that people need to travel to key services and facilities to which could be added jobs, training and skills, shops and leisure facilities. Neither of these two objectives are explicit about behavioural change which should be a key focus for LTP3. SEA objectives 8, 17, 18, and 21 should be grouped under an overarching objective to promote behavioural change to reduce travel by unsustainable modes. There is a huge opportunity in the current economic recession during which people are reducing their travel, to reinforce minimising the need for travel and improving community life. The key should be to reduce emissions by reducing fuel use and this economic costs.</p> <p>SEA could be expanded to 'enhance well-being and sense of community by reducing traffic impacts, creating more opportunities for social contact and better access to leisure activities and the natural environment.</p> <p>As noted above a SEA objective that tests LTP3 commitment to a network of green infrastructure that covers the county should also be considered.</p>			
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9.12	2-7 Objectives	SEA objective 21 should include reducing pollution	Agree to consider adding this the objective	Use comments to finalise set of SEA objectives	LTP3SEADSR9
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Chapter 3 Landscape and townscape

Ref	Page/ Para	Consultee Suggested change/ Comment	Officer Comment	Action	Consultee
1.37	3-1 Summary of Policy bullet 1	Suggest a reference to the fact that this is the European Landscape Convention definition for landscape	Agree	Text amended in bullet 1, para 3.1.1 and Annex 1	Ref LTP3SEADSR1
1.38	3-1 Summary of Policy bullet 1	This is a definition if landscape needs to be included in the main message that all landscapes matter and the LTP needs to incorporate key policy message that transport planning needs to protect manage and plan at all levels in relation to landscape issues	Agree. Add text to reflect this	Text amended in bullet 1, para 3.1.1 and Annex 1	Ref LTP3SEADSR1
1.39	3-1 Environmental baseline	To alter erosion of countryside to erosion of landscape character and the countryside. Then queries whether there is a drip, drip drip impact by junction improvements and lighting schemes	This relates to erosion of soils, although the description is a little ambiguous. Will make clear that this relates to soils. Visual intrusion is referred to elsewhere.	Amend text.	Ref LTP3SEADSR1
1.40	3-1 Environmental issues and opportunities	If this is to accord with the principles of the ELC then I think it needs to recognise that all landscapes matter and not just the designated bits and honeypot locations – need to recognise the contribution of the highway network as a component of landscape character and local distinctiveness. There is the opportunity for actions within LTP3 to bring about an enhancement to landscape character e.g. through scheme design or decluttering	Each of the issues have led from the text. The Peak District National Park is mentioned because we have due regard to its policies. However there for other implications/ opportunities we expect to recognise that all landscapes matter although this could be reflected more throughout the chapter. We will alter the text to reflect this more.	Amend text throughout chapter where relevant	Ref LTP3SEADSR1
1.41	3-1 Data gaps "high environmental value"	The phrase needs clarification	Further comments relate to this being landscape sensitive areas, therefore this phrase should be used.	Amend text	Ref LTP3SEADSR1
1.42	3-1 data gaps – light pollution	Not sure that it is true that light pollution is unlikely to worsen given that we have no clear policy for requiring a lighting scheme and we appear to be a light polluting authority. This shouldn't be scoped out.	Further comments relate to examining street lighting by landscape character areas. This is currently being undertaken to examine set a baseline for this information. Therefore we will consider reinstating the consideration of light pollution.	Examine issues further	Ref LTP3SEADSR1
6.2	3-1 data gaps light pollution	We believe that light pollution is likely to get worse over the next decade not better, as it states in the Scoping Report. We believe there is more up to date information that can be utilised in the report regarding light pollution. More recent data (2009) can be found at www.ngdc.noaa.gov/dmsp/downloadV4composites.html Furthermore, the dark skies project at the PDNPA can provide more up to date mapping and analysis evidence and reports on the impact of light pollution on biodiversity. For further information please contact Jane Chapman and the PDNPA.	As above we are now reconsidering light pollution. An email has been sent to Jane Chapman to investigate further data.	Examine issues further	Ref LTP3SEADSR6
1.43	3-1 draft objectives SEA1 "protected landscapes"	Would designated landscapes be a better word as this would include Conservation Areas. I am also uncomfortable by the wording "with particular emphasis" would "with due regard" be better as all landscapes matter.	Agree that the word designated would ensure conservation areas are covered. Not sure where the comment about "with particular emphasis relates as this is not included within the text. However due regard may clarify the objective and bring it more into line with the European Landscape Convention	Amend objective	Ref LTP3SEADSR1
8.6	General comment about chapter 3	We welcome the robust approach towards landscape issues, which refer to the European Landscape Convention, Landscape Character Assessment, light pollution, tranquillity and intrusion from signs. However the adopted approach emphasises the exceptional and does not fully embrace the principles of ELC....we suggest that the SEA objectives are amended to reflect these principles	Although we have attempted to reflect the ELC, we admit that the baseline assessment may still refer too much to the exceptional. We have taken this on board in amending objectives and in taking forward the appraisal stages through SEA Stages B.	Amend objectives and take forward the principles of ELC in rest of SEA.	Ref LTP3SEADSR8

8.7	General comment about chapter 3	Landscape is described rather than used as an effective integrating mechanism for co-ordinating policies and decisions and the Scoping Report does not appear to recognise the importance of landscape character assessment as a tool to resolve possible conflicts....The SEA should use LCA as a framework within which to make judgements about the impact of LTP3.	We believe that the LCA and development of Areas of Multiple Environmental Sensitivity will act as a framework for taking the delivery of the plan forward and to ensure that the landscape character is considered and enhanced as part of this. We will take this forward in the next stages.	Consider the use of the LCA and Areas of Multiple Environmental Sensitivity as a framework for delivery of LTP3 interventions.	Ref LTP3SEADSR8
8.8	General comment about Chapter 3	In view of some of the unstable landscapes within the County (e.g. along the A57 Snake Pass) the SEA should monitor the approach towards geodiversity. It does not receive adequate attention in either the landscape or biodiversity chapters, although RIGS are mentioned in the latter.	Further examination of this was undertaken with our landscape and biodiversity teams. It was considered that geodiversity had been covered through the landscape character assessment and therefore further assessment was not required. Issues such as landslips were of a localised nature and therefore not a strategic issue. However, it was agreed that geodiversity should be added to the objectives to ensure that it was retained at as important consideration.	Geodiversity was added to the SEA objective relating to biodiversity	Ref LTP3SEADSR8
1.44	3-2 Para 3.1.1 3 rd bullet	Why only the National Forest (in relation to integration of public transport with tourism and recreation)	This is a summary from the key messages of policy. This bullet refers only to the National Forest policy. In reality this will be considered across the County in Plan development.	No action required	Ref LTP3SEADSR1
1.45	3-2 Para 3.2.1	Replace 'cultural heritage' with 'historic environment'.	Agree	Text amended	Ref LTP3SEADSR1
5.5	3-2	As well as the LCA, there should be a reference to the County Historic Landscape Characterisation. There are a range of different types of urban characterisation including the Extensive Urban Surveys referred to on page 5-5, Conservation Character Appraisals and Management Plans and other types of townscape assessment such as those carried out to inform the development of town centre masterplans e.g Heanor	Agree that these should be highlighted here to link the landscape and townscapes with the historic environment that is assessed in later chapters. It is also worth mentioning here biodiversity too.	Additional paragraph added	Ref LTP3SEADSR5
1.46	3-3 Table 3.1	Needs a footnote to source from the two LCAs – Derbyshire 2003 and PDNP document.	Agree	Added footnote	Ref LTP3SEADSR1
8.9	3-7 Para 3.2.8	Visual intrusion from transport infrastructure has been identified as needing further evidence. To this should be added visual intrusion of traffic itself e.g. that on the A628T. Visual intrusion of traffic within the PDNP is a key issue on many routes and should not be scoped out as suggested in 5.2.31	Have concluded that visual intrusion should not be scoped out following further consideration of landscape and heritage assets in relation to their setting. This will be considered alongside visual intrusion from signs.	Consider visual intrusion from traffic in Stage B	Ref LTPSEADSR8
9.2	3-9 Para 3.2.14	Issue of physical and visual damage to environment caused by parking on grass verges in urban areas. Data gap could be narrowed by recording complaints on GIS.	The scoping report concludes that damage from parking was a localised issue and agree that this is not only within busy tourist areas but urban areas too. Visual intrusion from traffic will be considered as part of Stage B.	Note comment about parking and consider visual intrusion from traffic in SEA Stage B.	Ref LTPSEADSR9

Chapter 4 Biodiversity, flora, fauna and soils

Ref	Page/ Para	Consultee Suggested change	Officer Comment	Action	Consultee
1.23	4-2 Para 4.1.1 & Annex A1	Need to explain that NERC biodiversity duty for conserving biodiversity includes in relation to a living organism or type of habitat, restoring or enhancing a population or habitat	Agree,	Added text to that effect	Ref LTP3SEADSR1
4.7	4-3 Figure 4.1 4-4 Figure 4.2	In Bolsover District only Bolsover and Shirebrook are shown. The Council's settlement hierarchy has 4 towns: Bolsover, Shirebrook, Clowne and South Normanton. If possible, it would therefore be appreciated if the plans could be amended to show the status of towns in Bolsover.	Agree	Figure amended	Ref LTP3SEADSR4
1.24	4-5 Para 4.2.4	Suggest adding in text on area covered by SSSI, particularly PDNP	Agree	Text added	Ref LTP3SEADSR1

9.5	4-5 Para 4.2.4	Some designated wildlife sites are adjacent or close to relatively busy roads e.g. Ashgate Road. Upward trend in traffic growth will adversely affect these areas	An assessment of wildlife sites has been included within the baseline and consideration of traffic impact has been made. An assessment of traffic growth and the LTPs impact upon this will be assessed during stage B of SEA.	Analyse impact of LTP3 on traffic growth.	Ref LTP3 SEADSR9
1.25	4-5 Para 4.2.5	June 2010 data now out detailing SSSI condition. Has improved again.	Cut off date for SEA baseline is June 2010, therefore we have updated this data which shows the significant improvement in SSSI condition	Text amended	Ref LTP3SEADSR1
1.26	4-9 Para 4.2.15	Considering transport impacts mentioned under LBAPs is a reasonable approach but it should be recognised that just because an impact is not mentioned it does not mean it does not exist	Agree that this should be made clear	Text amended	Ref LTP3SEADSR1
9.13	4-9 Table 4.2	Table refers to damage of river banks by construction of cycle routes. Mitigation would normally be included.	Note	Note	Ref LTP3SEADSR9
4.4	4-10 Para 4.2.15	A Greenprint for Bolsover District is mentioned at Table A1.2 but could also be included in the section on Habitats and Species Action Plans starting at paragraph 4.2.15	Agree that Greenprints should be mentioned. Suggest sentences are added to this effect.	Sentence added to 4.2.17	Ref LTP3SEADSR4
1.27	4-10 Para 4.2.20	Recognise that inappropriate management of verges is an issue though not specifically mentioned	Agree, acknowledged inappropriate management in text	Text amended	Ref LTP3SEADSR1
4.5	4-11 Para4.2.21	Bolsover had a Green Infrastructure Study carried out in 2008. It is considered that this should be added to Table A1.2 and could be included in the section on green infrastructure starting at paragraph 4.2.21	Because the work is a study it is not appropriate to list this document in the annex about policy context. However it is a useful document for use in providing the evidence base and therefore we should make reference to this document.	Reference added to paragraph 4.2.22	Ref LTP3SEADSR4
9.14	4-11 Para 4.2.22	Should refer to damage caused by motorised vehicles on BOATS and green lanes.	Damage such as this is considered in paragraphs 3.2.16 and 3.2.17 and therefore no further need for inclusion here.	No action	Ref LTP3SEASR9
1.28	4-11 Para 4.2.25	New greenways are usually routed through existing green corridors and therefore there is usually some net loss, although this is controlled through planning, although net gain is strived for	Agree, update text	Text amended	Ref LTP3SEADSR1
8.10	4-11 Para 4.2.25	The Scoping Report identifies that there is no clear information but the networks of green corridors has been increasing. Given the importance of green networks in reducing car use; increasing peoples health and well being and providing access to nature, a robust framework to support the development of green infrastructure is essential and should be reflected in a SEA objective.	Agree to consider the inclusion of references to providing connectivity between habitats, creating opportunities for reducing car use and encouraging the use of more sustainable travel modes, including better access to the natural environment	Considered during review of draft SEA objectives and included	Ref LTP3SEADSR8
1..29	4-14 Para 4.2.32	Queried Barn Owl figures – seem low	Acknowledge that data may not be reliable and figures removed	Text amended	Ref LTP3SEADSR1
1.30	4-16 Para 4.2.42	Can concerns be fed into considerations about street lighting even though they may be scoped out of the SEA	We certainly expect to take forward such measures for consideration as enhancement measures in LTP3	Consider this at Strategy/ Implementation Plan stage	Ref LTP3SEADSR1
1.31	4-17 Para 4.2.46	Double negative in sentence 'it is unlikely that the salting network is unlikely to expand'.	Agree	Text amended	Ref LTP3SEADSR1
1.32	4-19 Para 4.2.53	Needs careful wording. I suggest that soil erosion is a strategic issue, especially in relation to peat soils in the Moors for the Future project area in terms of strategic peatland management and carbon capture/ sequestration/ management but that for the LTP, and specifically transport related soil erosion, it is not an issue that needs to be scoped into the SEA.	Agree	Text amended	Ref LTP3SEADSR1
1.33	4-20 Para 4.2.55	Many of the issues are broader than the matters considered, which have been draw from the BAPs. E.g. damage to habitats through construction – only two habitats have been identified for consideration – virtually any habitat could be lost to construction. Indeed if construction is just considered under the general heading of development then I would expect this to be identified as a key threat	The reference to the BAP is to tie it in with the earlier text where this was raised as an issue. The text about the issue is meant to be a general statement rather than about the two habitat types. Development as a whole is not being considered here as this is not the role of the LTP.	Text amended	Ref LTP3SEADSR1

1.34	4-20 Para 4.2.55	Early cutting of road verges – will significantly affect a wide variety of species present on the verge concerned (but might not be a significant driver for that species/ habitat at the county level)	Add text to clarify this	Text amended to clarify	Ref LTP3SEADSR1
1.35(a)	4-22 Para 4.3.1 Table 4-22 Para	I wonder whether some of the measures could be extended slightly as would be consistent with out NERC duty e.g. “continue to protect important species from being killed on Derbyshire’s road network” – im not sure how the current LTP does this (given the inherent difficulties) but could the current LTP have aims to identify hotspots for road kill and develop mitigation.	Agree	Text amended	Ref LTP3SEADSR1
1.35 (b)		In relation to construction and maintenance “LTP3 should aim to continue to protect habitats and species during construction and maintenance of the County Councils network – can we strive to protect and enhance?	Agree	Text amended	Ref LTP3SEADSR1
1.36	4-22 Para 4.4.1	Again some of the objectives could be extended to involve conservation enhancements:- SEA6 Encourage biodiversity and take measures to reduce fragmentation <i>and enhance connectivity</i> SEA7 Avoid damage to designated wildlife sites and protected and <i>notable species and other biodiversity resources, and promote their conservation and enhancement where opportunities exist</i> (note some of this is a legal duty under S28g of the Wildlife and Countryside Act 1981) SEA9 Prevent damage to the landscape <i>and biodiversity assets within it</i> , due to increases in recreational walking and cycling etc			

Chapter 5 Cultural Heritage including architectural and archaeological heritage

Ref	Page/ Para	Consultee Suggested change	Officer Comment	Action	Consultee
1.1	5-1 Summary of Key Messages of Policy – bullet 1; 5-2 5.1.1 bullet 1	Add text <i>‘and the proposed Creswell Crags World Heritage Site and their settings are protected at the highest level’</i>	This section summarises the messages of policy from other plans and programmes. This statement does not conform with the assessment of policies in Annex 1. Creswell Crags is picked up in the baseline assessment.	No action	Ref LTP3SEADSR1
1.2	5-1 Summary of Key Messages of Policy – bullet 2; 5-2 5.1.1 bullet 2	Add text <i>‘particularly designated sites and their settings, with the Historic Environment Record and The Landscape Character of Derbyshire used as key tools in this process’</i>	This message is included within Annex 1 and therefore agree that this should be added.	Text added into summary of policy and amend Annex 1 too. Also in making this amendment the Landscape Character Assessment for the Peak District National Park should be acknowledged and therefore text amended to refer to Landscape Character Assessments.	Ref LTP3SEADSR1
1.3	5-1 Summary of Key Messages of Policy – bullet 2; 5-2 5.1.1 bullet 2	Change ‘protection of natural historic buildings and environments’ to <i>‘protection of natural and cultural environments’</i>	See comment in Annex 1 point 5.1 relating to English Heritages comment that this should refer to historic buildings, structures and areas and that the word natural should be removed.	Text changed according to English Heritage comments.	Ref LTP3SEADSR1
1.4	5-1 Summary of Environmental Baseline	Add text (in relation to Swarkestone Causeway and A514) <i>‘and the bridge is part of a strategic route’</i>	The A514 is a principal road, however, under the Derbyshire Road Hierarchy, the A514 is considered a Secondary distributor and therefore not a strategic route.	Acknowledge in text that it is an important road crossing the River Trent south of Derby, although not a strategic route.	Ref LTP3SEADSR1

1.5	5-1 Summary of Environmental Baseline	Queried whether reference could be made to Grade 1 Aqueduct at Cromford Mill and Grade II* gangway at North Mill Belper which both span the highway and at risk from collisions	These two structures are considered in the main text. However, future risk to damage was considered low due to electronic signs being introduced at Belper and at Cromford once the aqueduct has been reinstated.	No action	Ref LTP3SEADSR1
1.5	5-1 Summary of Environmental baseline; 5-13 Para 5.2.36; 5.2.42	Queried effect of vibration on historic structures such as Swarkestone?	The scoping report considered evidence relating to vibration in some detail. An additional query with our structures team found that vibration was not considered a significant issue for bridges. Issues such as damage to parapets were more of a concern at Swarkestone and other historic structures.	Scoping Report considered damage to parapets and therefore no further action is required.	Ref LTP3SEADSR1
1.7	5-1 Summary of Environmental Issues	Suggested additional text ' <i>and other designated cultural sites from traffic damage.</i>	The main issue relates to Swarkestone Causeway which is considered vulnerable. Other issues are not considered of a significant importance but are covered at the development of SEA objectives.	No action	Ref LTP3SEADSR1
4.1	5-2 Paragraph 5.1.1	Active consideration is also being given to the submission of a bid for World Heritage Status at Creswell Crag. It may be appropriate to refer to this alongside the references to Derwent Valley Mills.	This paragraph is a summary of the examination of current policy. Creswell Crag has not yet been declared a WHS and therefore no policy in this context exists. The chapter does however consider Creswell Crag as a potential WHS and issues are raised there.	No Action	Ref LTP3SEADSR4
1.8	5-2 Introduction to 5.2	Suggested new text relating to Government's statement on the Historic Environment 2010.	Agree. Consultation on PPS15, which was quoted, has since been cancelled.	Text changed	Ref LTP3SEADSR1
5.6	5-2 Para 5.2.2	Again reference should be made to the County Historic Landscape Characterisation	Agree	Text added	Ref LTP3SEADSR5
5.7	5-3 onwards	To avoid confusion, when referring to designated historic parks and gardens, we suggest you refer to 'registered parks and gardens (as PPS5)	All references to this to be updated.	Text amended	Ref LTP3SEADSR5
1.9	5-3 Para 5.2.6 and 5.2.7	Various small text changes to clarify context	Agree.	Text changed	Ref LTP3SEADSR1
4.1	5-3 Paragraph 5.2.6	Active consideration is also being given to the submission of a bid for World Heritage Status at Creswell Crag. It may be appropriate to refer to this alongside the references to Derwent Valley Mills.	Within this section there is a separate section on Creswell Crag and therefore an additional reference is not necessary at this point.	No Action	Ref LTP3SEADSR4
4.2	Paragraph 5.2.6 onwards	Section 5.2.6 and the following text deals with Historic Landscapes and Townscapes, and mentions Chatsworth Estate. Hardwick Estate comprises two Grade 1 buildings (one of which is also a Scheduled Monument) set within a Grade 1 Registered Historic Park and Garden and it might be appropriate to mention this here and show it in figures 4.3 Nationally and Regionally Designated Sites, and 5.1 Designated Historic Environments	We had not made reference to Hardwick Estate specifically in the baseline because it is not particularly close to a county council road, whereas Chatsworth Estate is dissected by a B road. We have since made a reference to Hardwick Estate in paragraph 5.2.22 in relation to the M1 widening, but acknowledge that this is the responsibility of the Highways Agency. We do not think it appropriate to add Hardwick Estate to figure 5.1 as we have not shown other Historic Parks and Gardens on this figure. The Estate is shown on Figure 5.3 but not labelled as with others but we could label them all to highlight the locations better. Figure 4.3 relates to biodiversity designations and therefore again it is not appropriate to show Hardwick Estate in this context.	Label Hardwick Estate and other historic parks and gardens on Figure 5.3	Ref LTP3SEADSR4
1.10	5-3 5.2.8	Queried whether there are 10 scheduled ancient monuments or 10m listed buildings that are scheduled ancient monuments	Table 5.1 shows there are 10 scheduled ancient monuments.	Text clarified	Ref LTP3SEADSR1

4.7	5-4 Figure 5.1	In Bolsover District only Bolsover and Shirebrook are shown. The Council's settlement hierarchy has 4 towns: Bolsover, Shirebrook, Clowne and South Normanton. If possible, it would therefore be appreciated if the plans could be amended to show the status of towns in Bolsover. Similarly the district has five main villages: Barlborough; Pinxton, Creswell, Tibshelf and Whitwell. Again if possible it would be useful if the main villages could be treated consistently.	Agree	Figure amended	Ref LTP3SEADSR4
5.8	5-4 Figure 5.1	For clarity, it is recommended that the title of the Plan is amended to World Heritage Site. It is assumed that the area shown is the WHS boundary without the buffer-zone	The Plan does contain a reference to Creswell Crag too so it is not just the Derwent Valley WHS. The title may be confusing and therefore we have reviewed this to make clearer.	Title amended	Ref LTP3SEADSR5
1.11	5-4 Figure 5.1	Requested Creswell Crag proposed WHS is shown and also the Derwent Valley WHS in Derby City	Location of Creswell Crag is shown on plan as a dot to show location of Crag. Until this achieves WHS status it is considered that this should remain. Acknowledge that Derwent Valley WHS does not show in Derby City and map will be amended.	Update map	Ref LTP3SEADSR1
1.12	5-5 Para 5.2.12	Suggested additional text ' <i>In June 2010 the County Council was party to a submission to the Department for Culture, Media and Sport (DCMS) for its inclusion in the new UK World Heritage Site Tentative List</i> '.	Agree.	Text added	Ref LTP3SEADSR1
1.13	5-5 Para 5.2.14	Amendment to sentence to say that a key element of the historic landscape and townscape is the transport network.	Agree	Text amended	Ref LTP3SEADSR1
1.14	5-5 Para 5.2.15	Addition of text 'and the Planning (Listed Buildings and Conservation Areas) Act 1990' and other small text changes to clarify sentence	Agree	Text amended	Ref LTP3SEADSR1
5.9	5-5 para 5.2.16	The 2010 Heritage at Risk register has now been published and is available online at www.english-heritage.co.uk . As explained in the East Midlands part of the register page 13, the methodology for assessing conservation areas at risk has been refined. While the Derbyshire list has been reduced, there may still be outstanding issues that will need to be addressed in the conservation areas listed at 5.2.16. We suggest that you speak to the relevant Conservation Officer about this.	Text should be updated to reflect the 2010 position but also keep the 2009 areas in the Scoping Report until the views of the relevant Conservation Officer has been sought.	Text amended. Emailed the relevant Conservation Officer about the four that have since been removed from the at risk register.	Ref LTP3SEADSR5
4.3	Page 5-7 Paragraph 5.2.18	Also in relation to the section on Historic Landscapes and Townscapes, PPS5 gives registered parks and gardens the same status as other designated heritage assets, and it may be appropriate to refer to them in this section. In Bolsover District these assets are: Barlborough Old Hall II, Bolsover Castle I and Hardwick Hall I.	We have only made reference to historic park and gardens that may be impacted upon by transport as there are 29 in Derbyshire which would be too many to reference individually and would lose focus. In the draft Scoping Report none of these were mentioned. We have since added a reference to Hardwick Estate and Barlborough in relation to the M1 widening but acknowledging that this is the responsibility of the Highways Agency and not the LTP.	No further action required now Barlborough and Hardwick Estate are mentioned.	Ref LTP3SEADSR4
1.15	5-7 Para 5.2.20	Small text amendments plus commented that there are other historic designated bridges such as Cromford, Darley and Duffield river bridges which suffer damage from vehicle impacts but are not on the EH register because they are only grade II.	To clarify this we can add a sentence to this paragraph stating this.	Text added	Ref LTP3SEADSR1
5.10	5-7 Para 5.2.21	According to our list, there are 30 registered parks and gardens in Derbyshire, excluding Derby.	Add correct figure.	Updated	Ref LTP3SEADSR5
1.16	5-7 Para 5.2.22	Small text amendments plus suggested additional comment about Sudbury Hall, Hardwick Hall and Barlborough Hall	Agree to add, although additional comment made that the Highways Agency are undertaking the M1 widening proposals.	Text added	Ref LTP3SEADSR1
5.11	5-7 Para 5.2.22	While historically, there have been examples of where roads have cut through historic parks, including those listed, we do not view this as desirable and, as explained above, the intrusion of modern traffic does affect the setting of such sites.	Agree that the text should be amended to reflect this. However, we have also added an extra sentence to the effect that opportunities to do anything about the traffic are likely to be minimal.	Text added	Ref LTP3SEADSR5

1.17	5-8 Para 5.2.24	Comment about to whether Via Gellia should be considered as ancient woodland at risk to critical loads from aerial pollution and nutrient deposition.	Email accompanies this query. This also relates to an SAC. We are currently consulting Natural England as part of the SEA Scoping Report and Habitats Regulations Assessment. Therefore we will await those comments before considering further	Await Natural England comments	Ref LTP3SEADSR1
5.14	5-11 Para 5.2.28	The issue of visual intrusion is relevant to most areas of historic townscape, whether identified as Conservation Areas at Risk, in terms of street clutter and inappropriate design of highway improvement and traffic management schemes. The 'setting' of designated heritage assets as defined in PPS5 needs to be taken into account. The impacts on their setting may not just be visual considerations, but other environmental factors such as noise, dust and vibration (see paragraph 114 of the PPS Practice Guide) English Heritage expects shortly to publish draft guidance on setting. This comment also applies to page 5-10 onwards.			
1.18	5-12 Various paras	Minor text amendments	Minor changes to clarify text	Text amended	Ref LTP3SEADSR1
1.19	5-12 Para 5.2.30	Comment about to whether we can insert para about visual impact of traffic signing	Para 5.2.31 refers to this, however text needs amending to make this clear.	Text amended	Ref LTP3SEADSR1
1.20	5-13 Para 5.2.33	Comment to whether we can recommend the drawing up of a contingency plan for re-directing traffic in the event of a partial collapse [of Swarkestone Causeway]?	This is not relevant at the Scoping Stage. It will be considered at the option appraisal stage and the following consideration of mitigation measures should this be required.	Consider a contingency plan for Swarkestone Causeway as part of the option appraisal stage and any mitigation measures that may be required in the Plan.	Ref LTP3SEADSR1
1.21	5-14 Para 5.2.38	Comment about the effect of salt on the gable wall at Cromford Mill	Acknowledge this as an example	Insert text.	Ref LTP3SEADSR1
5.12	5-14 Para 5.2.38	Damage from salt pollution is probably wider than suggested in this paragraph, affecting structures such as bridges and walls, as well as historic buildings. We acknowledge that this may be a localised rather than strategic issue.	In addition to comment 1.21 we have made reference to this, although agree that it is likely to be localised rather than a strategic issue.	Text amended	Ref LTP3SEADSR5
5.13	5-14 Para 5.3.1	As indicated above, there is the opportunity to improve streetscapes through measures such as the removal of redundant signage.	Added the word enhance to reflect this opportunity. Added streetscapes as well as landscape and townscape.	Text amended	Ref LTP3SEADSR5

Chapter 6 Climatic Factors including greenhouse gases

Ref	Page/ Para	Consultee Suggested change	Officer Comment	Action	Consultee
8.11	6-1 Key messages of policy and 6.1.1	To the key messages of policy at the head of chapter 6 should be added behavioural change to reduce travel by unsustainable modes. The scoping report does not appear to address behavioural change and use of more sustainable modes in a robust way.	Behavioural change has been added as a key message of policy. Although behavioural change is a solution that can be used to tackle car growth and will be considered through the Plan development, to ensure that it is considered in a robust way we propose to include the encouragement of more sustainable modes within the SEA objectives	Amend text and include within SEA objective	Ref LTP3SEADSR8
8.12	General comment on chapter 6	The scoping report considers it difficult to establish the influence the county council has over traffic volumes and therefore CO2 emissions. We disagree. Evidence is already available on the effectiveness of travel planning interventions. Sustainable travel planning reduces car use by 9% and increases walking by 14% and cycling by 12% (Low Carbon Transport: A Greener Future)	We agree. Following the publication of the Scoping Report, we have been developing a Road Transport Carbon Reduction Strategy to form part of LTP3. This has clearly shown that the most impact the county council can have on road transport carbon emissions is in its role of behavioural change. Therefore this will be taken forward.	Behavioural change and the role of the County Council will be taken forward in the remaining stages of SEA and LTP3 development	Ref LTP3SEADSR8
3.1	6-10 Para 6.2.29	There may be a link between flooding and health issues in that significant flooding can contribute through overloaded drainage systems, particularly combined sewers.	Agree that there may be a link in that sewers can overflow causing contaminated water to cover areas. We are not sure whether there are any reported incidences of this happening in Derbyshire in past floods.	Have included a sentence in the text to highlight this as a particular issue. It is unlikely to feature as a significant issue but if problem areas are identified this can be considered at scheme stage.	Ref LTP3SEADSR3

9.7	6-10 Para 6.2.30	Should include reference to the part played by infrequent surface water drain maintenance in flooding incidents in Chesterfield 2007	Although I am not aware of the evidence relating to this issue in Chesterfield, it is clear that maintenance of drains will help the resilience of the network to deal with incidences of flooding.	Sentence added	Ref LTP3SEADR9
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Chapter 7 Water

Ref	Page/ Para	Consultee Suggested change	Officer Comment	Action	Consultee
9.8	7-2 Figure 7.1	Figure 7.1 shows Chesterfield Canal beyond that which is currently restored.	The map shows the routes of both navigable and disused canal routes, however the key or the figure does not make this clear.	Figure or the key should be amended to clarify this.	Ref LTP3SEADSR9

Chapter 8 Material Assets

Ref	Page/ Para	Consultee Suggested change	Officer Comment	Action	Consultee
7.2	8-7 Para 8.2.19	There is a significant inter-relationship between landscape character, cultural heritage, health, sustainable travel and sustainable tourism with regard to the inland waterway network and the role it can play if its function is fully realised. The Scoping Report could include an acknowledgement of the multi-functional role that this part of the transport asset within the County has.	Agree to acknowledge.	Sentence added.	Ref LTP3SEADSR7

Chapter 9 Population and human health including noise

Ref	Page/ Para	Consultee Suggested change	Officer Comment	Action	Consultee
9.9	9-3 Para 9.2.2	Chapter 9 future trend increase in population will increase demand for travel with consequent effect on congestion air and noise pollution. Increase in elderly population will increase problems of accessibility amongst that age group. Ill health amongst elderly could increase proportion of low-income households which would be less able to travel.	Agree that these are many of the issues referred to within the chapter on population growth. Population growth is considered a key issue for further consideration at Stage B of SEA.	Note agreement with findings	Ref LTP3SEADSR9
9.10	9-11 Para 9.2.21	Life expectancy at 65 is only 12 years?	This is the case for healthy life expectancy for males as an average for England and East Midlands. Total life expectancy for males at 65 is 16 years with the remainder being spent in poor health.	No action required	Ref LTP3SEADSR9
2.2	9-17 9.2.46	Pollution concentration units are referred to as μm^3 and should be $\mu\text{g}/\text{m}^3$	Agree	Text amended	Ref LTP3SEADSR2
9.6	9-17 Para 9.2.47	Air pollution in Chesterfield is significantly related to traffic. AQMA not declared due to moderation of pollution figures by central government not by fall in actual level of pollution.	The scoping report refers to the potential for an Air Quality Management Area (AQMA) in Chesterfield. Air quality has been predicted to improve during the lifetime of the LTP3. To maintain the consideration of air quality in Chesterfield we will ensure that an objective remains to reduce the emissions within Air Quality Management Areas so that this is considered once the Borough Council declare an AQMA.	Preserve objective relating to air quality management areas and continue close liaison with Borough Council over air quality issues.	Ref LTP3SEADSR9
10.1	9-17	Under Air Quality "examination of air quality data in relation to population and biodiversity" has been suggested. Defra would recommend the addition of the following: "Identify Air Quality Management Areas (AQMA) and "Identify areas exceeding the national air quality objective within the AQMAs".	At this stage there is only one AQMA declared in the county that relates to local traffic. Within this only one household is affected. Therefore there is currently no need to examine AQMAs any further.	Note for action in future should further AQMAs be declared.	Ref LTP3SEADSR10
8.13	9-18 Para 9.2.51	Traffic (road and rail) noise is not considered a significant issue for most of the county and apart from DEFRA's first priority locations is to be scoped out. The impact of traffic noise in rural areas is often underestimated and is significantly detrimental to the tranquillity	At the beginning of the SEA process we consulted on the use of evidence base. As part of this we scoped out the consideration of rail noise as this was wholly outside the influence of the LTP or the Authority. In terms of traffic noise we examined the baseline	Include SEA objective relating to reducing noise. Tranquillity is also a sub-objective in relation to protecting and enhancing the landscape	Ref LTP3SEADSR8

		communities can experience. We suggest that traffic noise is not scoped out but considered as it was in the SEA for LTP2.	across the whole county as we did in LTP2. This assessment generally correlated with the findings of the DEFRA first priority locations. Therefore in terms of a significant issue noise was scoped out. However, noise reduction remains an issue that LTP3 will seek opportunities across the county and not just the first priority locations which will be reflected in the SEA objective relating to noise being non-specific.	character.	
9.11	9-18 Para 9.2.51	Whilst vehicles may be getting quieter increases in traffic will bring an increase of tyre noise presumably. The existing situation on the main radial routes (Chatsworth Road A61 and A619) is surely poor and needs to be improved.	The baseline situation and a prediction of noise in 2026 has been undertaken in the Scoping Report. The A61 is highlighted as being subject to higher levels of noise and parts have been identified as First Priority Locations for further assessment and potential mitigation. The A619 was approaching noise thresholds.	Noise will be considered in stage B as well as to how the LTP3 strategy will affect traffic growth. Further consideration of the first priority locations will also be undertaken.	Ref LTP3SEADSR9
8.14	General comment relevant to chapter 9	The SEA incorporates a Health Impact Assessment and reference to the Habitats Regulations Assessment which is being undertaken at the same time. Combining three assessments provides an opportunity to integrated the health, social, economic and environmental agenda to achieve shared goals. However, this opportunity has not been taken. For example physical fitness and obesity appears in the chapter on population and human health and refers to opportunities for walking and cycling to reduce health inequalities. This fails to reflect the way in which walking and cycling generate benefits for all of the Governments Delivering a Sustainable Transport Systems goals, for example by reducing congestion and greenhouse gas emissions, and by reducing absenteeism by at least 6% with huge savings to employers and the economy. People making local journeys are more likely to support local retailers and suppliers and potentially reduce the carbon impacts of food miles. Pedestrians and cyclists impose little danger on the other road users and a switch to more cycling would benefit road safety. More people walking and cycling makes drivers more aware of their needs and may also encourage more drivers to take up these modes. This creates a virtuous circle of reduced motor traffic, better health, improved safety and better quality of life.	The SEA Scoping Stage examined issues on a topic by topic basis. The comments made are more relevant to the development of strategy stage rather than the examination of the baseline. The draft LTP3 strategy will include measures to encourage more people to walk and cycle and will use these comments to appraise the potential for change through the various alternatives.	Use comments during the appraisal stage of SEA.	Ref LTP3SEADSR8
9.3	General comment	Parking on footways and verges can obstruct pedestrians especially vulnerable road users and can obstruct bus services	This is a localised issue rather than an issue for strategic assessment. However, it should be noted for consideration as part of the implementation of the strategy.	Note comments for use at implementation stage e.g. under civil parking	Ref LTP3SEASR9
9.4	General comment	Provision of greenways can assist objectives when provided as part of a commuter route	This relates to the implementation of the plan and a way of achieving most against the objectives. It is likely that commuter routes will be considered as part of the introduction of cycling schemes	Note comments for use at implementation stage	Ref LTP3SEASR9

Annex 1 Key policies, plans and programmes of relevance to the Derbyshire LTP SEA

Ref	Page/ Para	Consultee Suggested change	Officer Comment	Action	Consultee
4.6	N/A	Work is ongoing on the North Derbyshire Transport Study. The findings of the study should be influential in shaping the Local Transport Plan, and it should therefore be included in Annex 1.	The 'Study' is a collection of an evidential base, rather than a particular study of transport. As such it is not setting policy and therefore does not need to feature in Annex 1. It will of course be used in the development of LTP3 and implementation plans.	No action.	Ref LTP3SEADSR4
5.1	A1-5	The inclusion of the word 'natural' is inappropriate in the context of historic buildings. We suggest that you either refer to 'the protection of historic buildings, structures and areas' or just to 'heritage assets'. This needs to be amended throughout the document e.g. page 5-2 and A1-5.	Agree that this should be amended in all references to the historic environment. The word natural had been added to refer to the environment as a whole, but this can be taken account of at the objectives stage and environmental report.	Amend statements in document	Ref LTP3SEADSR5

8.2	A1-9 Item 11	The sustainable development principles embedded in the East Midlands Regional Plan must survive whatever happens to the policy document.	The Draft LTP3 strategy is being developed within the same principles so this will happen.	Note	Ref LTP3SEADSR8
8.3	A1-11 Table A1.2	One omission appears to be recent developments in ecosystem services. Ecosystems are mentioned in Chapter 4...To those should be added the UK National Ecosystem Assessment February 2010 which outlines progress and steps towards delivery. The ecosystems approach is a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way (An introductory guide to valuing ecosystems services DEFRA 2007). Ecosystems are crucial in the regulation of pollution, the climate, noise and water. They are therefore important in developing LTP3.	Agree that the ecosystems approach should be embraced and this is something that the work to identify areas of multiple environmental sensitivity starts to bring together.	Add Ecosystems to list of relevant policies in Table A1.2	Ref LTP3SEADSR8
6.1	A1-13 Item 34	I am sure you are aware, we are still developing our Local Development Framework Core Strategy, so the most recent version of this will need to be used in your evidence base.	This has been taken account of, but notice that it has been missed off the list in this item.	Add Peak District National Park to list.	Ref LTP3SEADSR6
9.1	A1-13 Item 34	Chesterfield Borough Councils Sustainable Design SPD. Especially in relation to permeable surfaces	Added to item 34 reference to relevant SPDs	Text amended	Ref LTP3SEADSR9
8.4	A1-13 Item 35	With the loss of regional strategies, cross boundary working with neighbouring local highway authorities will become crucial. The LTPs of the adjoining authorities should be added to Table A1-2 line 35	At this stage of SEA the LTP3s of surrounding authorities have not yet been produced. We are working with surrounding authorities and therefore issues are currently being taken account of. Following publication the LTP3s these can be added to update the list.	Add LTP3 of surrounding authorities once published.	Ref LTP3SEADSR8
5.3	A1-25 Item 88	As well as item 88 UNESCO World Heritage Sites, the Derwent Valley Mills World Heritage Site Management Plan, which was updated in 2007 should be listed.	Although mentioned in item 88 we agree that this should be listed separately.	Reuse item 93 to add this reference	Ref LTP3SEADSR5
1.47	A1-25 Item 88	Update text to reflect new guidance documents and policies in LDFs.	Agree to updates	Text amended.	Ref LTP3SEADSR1
1.48	A1-25 Item 89	Name of policy to be changed to Heritage at Risk English Heritage Report July 2009.	Agree	Text amended	Ref LTP3SEADSR1
5.2	A1-25 Item 92	PPS places more emphasis on the importance of locally important heritage assets, as well as designated assets, than the previous PPGs.	Text should be updated to reflect this, rather than just focussing on designated historic areas.	Text amended	Ref LTP3SEADSR5
1.50	A1-25 Item 92	PPS5 also stresses the importance of the historic environment in place making and sense of local identity.	This has been reflected in amending text following EH comments.	Acknowledge.	Ref LTP3SEADSR1
5.2	A1-25 Item 93	Item 93 PPG16 should be deleted as it is superseded by PPS5 Planning for the historic environment and the accompanying practice guide. The	Acknowledge	Delete item 93	Ref LTP3SEADSR5
1.49	A1-25 Item 93	PPGs 15 and 16 have now been withdrawn and are no longer relevant.	This has now been deleted following EH comments	Acknowledge	Ref LTP3SEADSR1
1.51	A1-25 Item 94	The Historic Environment Record also lists several thousand non-designated heritage assets that in line with PPS5 also need consideration in terms of their significance and potential.	Agree	Text amended to reflect this.	Ref LTP3SEADSR1
5.4	A1-27 Item 96	It should be noted that the time-depth dimension to the County LCA is provided by the County Historic Landscape Characterisation. Also of relevance is your County's recent work on identifying broad areas of landscape sensitivity bringing together the LCA, HLC and biodiversity dataset to identify 'Areas of High Environmental Value'; the plan is shown on page 3-13. It should be noted that this is a strategic assessment and there will be smaller areas of value that can be identified at a more local level.	Agree	Text amended.	Ref LTP3SEADSR5
8.5	A1-28 Item 100	PPS7 has been surpassed by draft Planning for a Natural Healthy Environment (March 2010) which was out for consultation until June 1 2010. This document should be added.	Note the consultation and that this document is likely to supersede PPS7 in time, will add a note to this effect.	Text amended	Ref LTP3SEADSR8