

# SEA Environmental Report: Appendix D

---

## Draft Environmental Report Comments

Consultee	Comment	Response
<b>Natural Resources Wales (NRW), please note that NRW's response covered both the Mid and North Wales JLTPs.</b>	We would appreciate clarification as to whether North Wales' strategic and international role as the main European route to Dublin/Republic of Ireland has been considered in this assessment process and plan itself and whether potential advantages/disadvantages arising from North Wales' role have been considered / addressed.	Not applicable to Mid Wales JLTP
<b>NRW</b>	We also wish clarification as to whether marine transport and infrastructure have been considered within the plans.	Marine transport and infrastructure has not been considered within the Mid Wales JLTP
<b>NRW</b>	<b>Connections to key destinations and markets.</b> Following on from our comments above, NRW again wishes clarification as to whether North Wales' role as the 'gateway' to republic of Ireland and potential opportunities associated with this role has been recognised and addressed both in the plan itself and in this assessment process. Focus on improving accessibility and linkages to the Enterprise Zones seem to be missing opportunity to increase North Wales' essential role as link between Ireland and cities of NW England, the UK and Continent.	Not applicable to Mid Wales JLTP
<b>NRW</b>	When reference is made to the National Transport Plan for Wales we wish clarification as to which version of the Plan comments relate to. The Wales National Transport Plan 2014 is currently out for consultation.	Noted. Text has been updated.
<b>NRW</b>	<b>National Plans and Programmes.</b> Reference should be made to the current version of the Wales Transport Plan (2014 draft) as well as to the 2008 version.	Noted. Text has been updated.
<b>NRW</b>	Also we note the omission of the review of the North West England and North Wales Shoreline Management Plan in the North Wales Plan SEA Environmental Report. We consider that potential and actual flood risk identified in these documents should be included within the SEA.	Noted, however it is not considered that this Plan is of relevance to the Mid Wales JLTP.
<b>NRW</b>	<b>Material Assets</b> No consideration is given to rail infrastructure, port/marine travel	As per the SEA Scoping report material assets have been a consideration in the development of a number

Consultee	Comment	Response
	<p>infrastructure or links to international air ports in UK (both by rail and road). The sectoral scope of the JLTps appears to be limited to roads with no apparent regard given to haulage (short, medium and long haul), and links to other transport infrastructure including UK rail and airports.</p> <p>It is considered that there is a need to integrate and consider all transport modes not just road, public road transport etc. There is no mention of the need to consider the needs of forestry/ agricultural haulage despite rural spatial scope of plan.</p>	<p>of the SEA objectives including climatic factors, population and human health, and SEA Objective 12 is specified within the SEA Scoping Report as a specific objective relating to material assets.</p> <p>In addition a review of the proposed interventions has been undertaken to determine whether any impacts will occur to material assets such as ports, railways and haul routes.</p>
NRW	<p><b>Landscape and Townscape</b> There is a need to avoid urbanisation of rural roads. There is no mention of lighting or tranquillity issues, which should be given regard. There is a need to maintain locally distinctive road verges/margins including walls, hedgerows, non-kerbed verges etc</p>	Table 3-2 has been updated to reflect NRW comments relating to landscape and townscape
NRW	<p><b>While NRW agrees in principle with the identified objectives we have the following comments to make on the Objectives of the Plan:</b></p>	Noted. NRW comments have been taken account of and the SEA sub-objectives presented in Table 3-4 of the SEA Environmental Report have been updated.
NRW	<p><b>3: Noise and Vibration</b> – This objective should be extended to include light pollution and adverse effects on tranquillity.</p>	Please note that Comments regarding SEA Objective 3 (Noise and vibration) relating to light pollution have been included within SEA Objectives 10 (Cultural Heritage) and 11 (Landscape and Visual)
NRW	<p><b>4. Biodiversity</b> - NRW would have expected for this objective to seek to avoid disconnection between European Protected Species and other protected species and their roosting/foraging/resting habitats. See also light pollution issues.</p>	
NRW	<p><b>7. Contamination and Soil Quality</b> – NRW would advices that this objective is strengthened and include a specific objective to avoid transfer/spread of invasive species including Himalayan balsam (roadsides e.g. in Conwy Valley) and Japanese knotweed, through import/movement of contaminated soils.</p>	
NRW	<p><b>8. Water resources, flood plains and flood risk</b> - will the plan minimise water quality issues/pollution from road drainage?</p>	

Consultee	Comment	Response
NRW	<b>10. Local distinctiveness and Cultural Heritage</b> - need to avoid urbanisation of rural roads. Lighting and tranquillity issues not mentioned. Need to maintain locally distinctive road verges/margins including walls, hedgerows, non-kerbed verges etc.	
NRW	NRW considers that the alternatives presented are weak and that alternative solutions should be considered in proposed projects/options/transport modes etc.	The approach to the alternatives has been further clarified within the SEA ER to better reflect the identification and assessment of the alternatives.
NRW	<b>SEA Objective 1: Air Quality</b> With regards to the recommendations for mitigation/enhancement, although NRW agrees in principle it is considered that there is a need to consider the implications of transport derived air pollution not only on human health but also in terms of impacts on habitats/species and, in particular, the need to consider cumulative and synergistic effects with other projects and plans. There is also a need to take into account the sections on air pollution contained in the HRA to the 2014 Wales National Transport Plan.  There is a need for explicit commitment to monitoring of air pollution across the plan area in order to establish where and when particular issues occur with transport induced air pollution. This is not only dependent on traffic volume/congestion but also dependent on time/prevailing weather conditions and cumulative effects.	Noted. The cumulative assessment of air quality has been updated to include an assessment of the potential cumulative effects upon ecological sites. Reference has also been made to the 2014 Wales National Transport Plan which was not published at the point of publishing the JLTP Documents for consultation.  With regards the monitoring strategy, an inclusion of monitoring relating to AQMAs across the region has been identified within the existing monitoring framework.
NRW	<b>SEA Objective 2: Climate Change</b> The identified mitigation measures needs strengthening and there is a need for explicit commitment towards adaptation of existing transport infrastructure to climate change effects. The avoidance of flood areas is welcomed but there is also a need to consider potential exacerbation of flood hazard with new transport schemes. There is a need to consider issues such as reduction of sealed surfaces e.g. in car parking, avoidance of geohazard (landslip) etc.	Noted. Mitigation has been updated to reflect NRW comments.
NRW	<b>SEA Objective 3: Noise and Vibration</b> Objectives do not include light pollution and effects on tranquillity.	Mitigation has been updated to reflect NRW comments.

Consultee	Comment	Response
	Mitigation measures should include monitoring/periodic review of tranquillity, explicit aim to reduce unnecessary lighting and to investigate 'appropriate lighting' methods. The aim should be for development to be 'dark sky' compliant.	Please note that Comments regarding SEA Objective 3 (Noise and vibration) relating to light pollution have been included within SEA Objectives 10 (Cultural Heritage) and 11 (Landscape and Visual)
NRW	<p><b>SEA Objective 4: Biodiversity</b></p> <p>There is a need to avoid both direct and indirect effects not only European sites but also on all sites designated for nature conservation interests, UKBAP habitats etc. Need to ensure that options do not increase fragmentation/compromise habitats or disconnect valued species from their roosting/foraging grounds etc.</p> <p>Please note that the use of statutory assessment at project level (EIA/HRA) is not 'mitigation' and this compromises the strategic assessment processes to look at cumulative and synergistic effects and may 'block' consideration of alternatives. It is not appropriate for this to be put forward as mitigation.</p>	Noted. Mitigation has been updated to reflect NRW comments.
NRW	<p><b>SEA Objective 7: Contamination and Soli Quality</b></p> <p>There is a need for the plan to include specific objective to avoid transfer/spread of invasive species including Himalayan balsam (roadsides e.g. in Conwy Valley) and Japanese knotweed, through import/movement of contaminated soils.</p>	Noted. Mitigation has been updated to reflect NRW comments.
NRW	<p><b>SEA Objective 8: Water resources, flood plains and flood risk</b></p> <p>See comments above on SEA objective 2: Climate Change.</p>	Noted. Mitigation has been updated to reflect NRW comments.
NRW	<p><b>SEA objective 10: Diversity, Local Distinctiveness and Cultural Heritage</b></p> <p>Again, as already highlighted above, the use of statutory assessment at project level (EIA/HRA) is not 'mitigation' and this compromises the strategic assessment processes to look at cumulative and synergistic effects and may 'block' consideration of alternatives. It is not appropriate for this to be put forward as mitigation.</p> <p>It is considered that the mitigation measures identified are weak and</p>	Noted. Mitigation has been updated to reflect NRW comments.

Consultee	Comment	Response
	<p>'retrofit'. There is a need to identify specific mitigation aimed at pro-active avoidance of urbanisation of the landscape, maintenance of local landscape and cultural distinctiveness etc</p>	
<p><b>NRW</b></p>	<p><b>SEA Objective 11: Landscape</b>  Again, as already highlighted above, the use of statutory assessment at project level (EIA/HRA) is not 'mitigation' and this compromises the strategic assessment processes to look at cumulative and synergistic effects and may 'block' consideration of alternatives. It is not appropriate for this to be put forward as mitigation.  The design manual reference is welcomed however; this manual covers the whole of the UK and does not enable/reflect the protection/enhancement of local landscape character. Need to have specific mitigation aimed at pro-active avoidance of urbanisation of the landscape, maintenance of local landscape and local distinctiveness etc.  4.5: See comments above. It is considered that the mitigation measures proposed are weak and do not provide any degree of confidence. The use of EIA/HRA at the project level as 'mitigation' is inappropriate. The identified mitigation measures need to include a more pro-active approach and sufficient surety so that NRW can have confidence that mitigation measures will be appropriate and will avoid the avoidable in terms of adverse effects. The aim of the SEA exercise is to negative impacts from occurring and not to deal with things ad hoc.</p>	<p>Noted. Mitigation has been updated to reflect NRW comments.</p>
<p><b>NRW</b></p>	<p>The SEA process (Annex 1, f, 1) requires the process to look at 'secondary, cumulative, synergistic, short, medium and long term permanent and temporary, positive and negative' effects. Consideration of cumulative and synergistic effects alone may not be sufficient to comply with the Regulations and Directive. What seems to be presented here is a list of local level plans and programmes which are relevant to the North Wales and Mid Wales JLTP only. However, there is a significant omission, namely the developing Wales National</p>	<p>Noted. The developing Wales National Transport Plan (2014) has been included within the list of cumulative schemes and the assessment reviewed in light of its inclusion.</p>

Consultee	Comment	Response
	Transport Plan 2014.	
NRW	<b>Table 4-5 Cumulative and Synergistic Effects of the JLTP</b> It is considered that the contents of this table it weak and requires further explanation other than 'negative' or 'positive and negative'.	Noted. Table 4-5 has been updated to include further information, as well as considering the effects from the Wales National Transport Plan (2014)
NRW	<b>Monitoring:</b> The SEA Directive and process require the significant environmental effects of implementing a plan to be monitored in order, amongst other things, to identify unforeseen adverse effects and to be able to take remedial action. The proposal to undertake monitoring associated with SEA objectives may not enable identification of unforeseen effects and may not be sufficiently broad in scope so as to enable the monitoring process to be effective.	The monitoring framework that has been developed for the Mid Wales JLTP has been developed to track the environmental effects of the interventions developed within the plan and to prepare for appropriate responses where adverse effects are identified.  The monitoring framework has been updated to include further measures for monitoring across the region.
NRW	<b>Appendix A – Baseline Data and Review of Plans, Programmes and Environmental Protection Objectives</b> In terms of baseline data Chapter F deals with Water Features, Quality and Flood Risk. In terms of data gaps and uncertainties identified, NRW encourages the use of NRW Flood Zone Maps of Fluvial and Tidal Flood Risk which are updated on a more frequent basis than the Development Advice Maps referred to in the document. The Local Authorities also have surface water flood maps which should be reviewed which would remove this data gap.	Noted. Baseline Section has been updated as per NRW's comments.
NRW	In terms of individual interventions identified, early consultation at project level with Natural Resources Wales and other statutory consultees is encouraged in order to identify appropriate mitigation and enhancement measures as early as possible and to ensure that the identified measures are able to be integrated into the design process.	Noted.
Anglesey and Gwynedd Joint Planning Policy Unit	Environment issues are also considered to be a prerequisite that must be considered at the outset of any transport scheme. Developments	Noted.

Consultee	Comment	Response
	that promote sustainability and reduce environmental impacts should be encouraged. New opportunities for environmental improvements such as tree and hedge planting along newly constructed and existing transport routes should be promoted.	
<b>Anglesey and Gwynedd Joint Planning Policy Unit</b>	The Strategic Environment Assessment accompanying the plan has identified potential adverse impacts arising from the schemes identified and subsequent mitigation measures which will lead to environment protection and enhancement.	Noted.
<b>Anglesey and Gwynedd Joint Planning Policy Unit</b>	It is acknowledged that the potential impacts of the JLTP have been identified. As project-level HRA will be required in relation to the projects listed, it is felt that all appropriate measures are in place to mitigate for any impacts to protected habitats.	Noted.
<b>Brecon Beacons National Park Authority (BBNPA)</b>	Paragraph 4.4 identifies the Brecon Beacons National Park Management Plan (2010-2015) as a document which includes a range of environmental protection policies for the Park which are relevant to transport proposals. One aim of the Brecon Beacons National Park Management Plan (LC3) states that 'Sustainable transport initiatives will enhance accessibility across the Park whilst reducing the reliance on private motor vehicles'. The Authority is currently undertaking a review of its Management Plan and we would welcome the opportunity to work with relevant organisations to develop links between emerging plans, initiatives and environmental protection objectives.	Noted.
<b>BBNPA</b>	A new concept of Town/Community/Village Plans is emerging across communities within the park where issues regarding rural transport are often raised as being of paramount importance to the community. As an example the community of Hay on Wye have paid to have a bus service on Sundays and Bank Holidays. Regard should be had to each community plan as and when it is prepared. Such recommendations may include advisory signage, speed control measures and/or the use of regulatory measures, such as Traffic Regulation Orders. Links can be made here to the Park's	Noted.



Consultee	Comment	Response
	Visitor Transport Initiative, which should also be considered.	
<b>BBNPA</b>	The Landscape Character Assessment for the Brecon Beacons National Park was prepared in 2012 and the Local Biodiversity Action Plan is an evolving document that should also be considered.	Noted. An assessment of policies and plans has been undertaken and is set out in Appendix A.
<b>BBNPA</b>	The Brecon Beacons National Park Authority Rights of Way Improvement Plan advocates the integration of public transport and public access, identifying a need for improved links between public transport and the public rights of way network. It states that sustainable transport including community transport and public transport to access public rights of way within the National Park should be increased.	Noted. It is considered that the Strategic Bus Corridors and the proposed Active Travel for "designated" localities will provide additional linkages between public transport and active travel links.
<b>BBNPA</b>	The State of the Park Report (2014) uses a variety of data including Census 2011 statistics to bring together different types of information regarding the present condition of the National Park. The introduction to the report identifies useful general information including projected population, age profiling and assessments of general states of health.	Noted.
<b>BBNPA</b>	<p>Can you recommend any important information sources to supplement the baseline data we are collating, that will inform the assessment process?</p> <p>Further to those identified above, we would recommend the following:</p> <ul style="list-style-type: none"> <li>· Census 2011</li> <li>· Natural Resource Wales's Rapid Review of Brecon Beacons National Park 2014</li> <li>· Environment Agency Evidence Packs for Local Authorities and National Parks</li> <li>· Brecon Beacons National Park Authority Residents Survey 2013</li> <li>· Valuing Wales' National Parks (September 2013);</li> <li>· Various scientific studies that show that large parts of the modern economy are dependent on the quality and sustainable use of the environment <a href="http://www.teebweb.org/">http://www.teebweb.org/</a></li> </ul>	Noted.

Consultee	Comment	Response
<b>BBNPA</b>	<p>The following sustainability issues, which were raised at a 'Town and Community Council Liaison Meeting (March 2014)', are considered relevant to this consultation:</p> <ul style="list-style-type: none"> <li>· Better Broadband in Rural areas.</li> <li>· Need to know the geographical reach for Superfast Cymru to allow business and education and access to services to plan</li> <li>· Flooding &amp; insurance issues for both properties which flood &amp; those perceived to be at risk (by insurers)</li> <li>· Lack of mobile phone signal in many rural areas – blackspots and failure during periods of higher usage.</li> <li>· Education quality &amp; loss of schools</li> <li>· Population trends; increasing 0-10yrs , and incoming over 50's</li> <li>· Ageing population</li> <li>· Provision of Affordable Housing (?)</li> <li>· Jobs &amp; Skills training</li> <li>· Jobs potential</li> <li>· Cost of living &amp; Energy resilience</li> <li>· Biodiversity</li> <li>· Water - availability</li> <li>· Weather fluctuations</li> <li>· Loss of land</li> <li>· Food production</li> <li>· Jobs - where will people work &amp; what as?</li> <li>· Infrastructure for employment-for National park area higher value (lower volume) processing &amp; microbusinesses more appropriate (lower volumes to transport)</li> <li>· Tourism- some benefits but employment tends to be seasonal</li> <li>· High business rates contributing to decline of town centres</li> </ul>	<p>Noted. Of the issues that have been raised by the Town and Community Council, those relating to transport and the environment have been identified within Table 3-2.</p>
<b>BBNPA</b>	<p>The following identifies dominant issues and drivers of changes that affect or are likely to affect the National Park now and in the future:</p> <ul style="list-style-type: none"> <li>· Climate Change</li> <li>· Biodiversity</li> <li>· Farming Pressures</li> </ul>	<p>Noted. As above, those issues relating to transport and the environment have been identified in Table 3-2.</p>

Consultee	Comment	Response
	<ul style="list-style-type: none"> <li>· Local Population Pressures</li> <li>· Renewable and Non-renewable energy</li> <li>· Transport</li> <li>· Globalization</li> </ul> <p>Each topic interacts with the other in complex ways to create synergistic effects that exacerbate existing management concerns. Consequently, integrated management and partnership working are essential for effective, long term, sustainable management. Further details regarding any of the above topics can be provided if required.</p>	
<b>BBNPA</b>	<p>Are there any specific indicators you feel should be included?</p> <ol style="list-style-type: none"> <li>1. Death from Road Traffic Accidents</li> <li>2. Total number of KSI (Killed or Seriously Injured) casualties per year</li> <li>3. Distances travelled per person per year by mode of transport</li> <li>4. Local authority air quality monitoring indicators (1,3-butadiene, benzene, carbon monoxide, lead, NO2, PM10, SO2)</li> <li>5. Carbon footprint</li> <li>6. Public transport routes in the Brecon Beacons National Park</li> <li>7. Access to GP or primary care professional</li> <li>8. Access for disabled people</li> <li>9. Access in rural areas</li> <li>10. Accessibility to health care facilities</li> <li>11. An indicator relating to the issue of: <ul style="list-style-type: none"> <li>· The loss or impairment of geodiversity</li> <li>· The loss or impairment of historic landscapes, scheduled ancient monuments and other archaeological features</li> <li>· Threats to biodiversity from habitat loss and the anticipated effects of climate and agricultural change</li> <li>· Impoverishment of the quality and character of the built environment</li> <li>· Loss of tranquillity within the Brecon Beacons National Park</li> <li>· Poor access to services in rural areas</li> </ul> </li> </ol>	<p>The draft monitoring framework set out in Table 5-1 has taken account of those specific indicators relevant to the Mid Wales JLTP.</p>