



Warwickshire County Council

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# INTEGRATED SUSTAINABILITY APPRAISAL

Post Adoption Statement



Warwickshire County Council

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## Post Adoption Statement

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APPENDIX A

CONSULTATION COMMENTS

# 1 INTRODUCTION

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## 1.1 THE LOCAL TRANSPORT PLAN

- 1.1.1. Warwickshire county council (WCC) are producing a new version of the existing Local Transport Plan (LTP3) as a result of changes to the transport network in Warwickshire through the development of multiple transport schemes. LTP4 will alter the way transport planning is carried out in the county, with a focus on creating safer communities and streets, integrating modes and focus on connectivity, mobility and movement in the county, as well as encouraging a modal shift away from private car use.
- 1.1.2. LTP4 is being developed to allow WCC to address new and emerging transport needs. LTP4 will identify transport policies and strategies needed to manage and maintain Warwickshire's transport network in a safe, sustainable and integrated way.
- 1.1.3. LTP4 is being developed to support the three Priority Outcomes of WCC's Council Plan<sup>1</sup>:
- Vibrant Economy and Places - Right jobs, training, future skills, education, infrastructure and places;
  - Best Lives - Communities and individuals supported to live safely, healthily, happily and independently; and
  - Sustainable Futures - Adapting to and mitigating climate change and meeting Net Zero commitments.
- 1.1.4. LTP4 aims to have a flexible, tailored approach to transport changes, and deliver appropriate policies for future impacts upon transport, for example through climate change and decarbonisation of the transport sector, as well as societal changes.
- 1.1.5. The LTP proposes a series of strategies (and policies) to guide future decision making. These policies are detailed in **Table 2-1** of the main ISA Report and work together to create the LTP4 and are grouped under seven strategies that form LTP4:
- Core Plan;
  - Active Travel Plan;
  - Public LTP4;
  - Motor Vehicles Plan;
  - Managing Space Plan;
  - Safer Travel Plan; and
  - Freight Plan.

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<sup>1</sup> Warwickshire County Council, Council Plan 2022-2027

- 1.1.6. The development of LTP4 has provided the opportunity to take a different perspective on the connectivity requirements in the region. This involved taking a strategic policy view, focusing on transport's role in supporting and driving the economy, whilst ensuring the principles of sustainable development are followed to maximise social and environmental benefits (or mitigate negative effects). The Plan has been developed with WCC partners, working in an iterative manner.

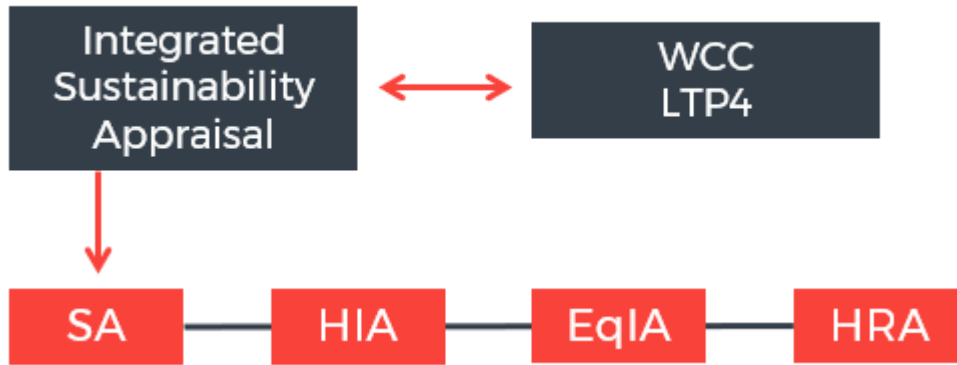
## 1.2 THE APPRAISAL OF SUSTAINABILITY

- 1.2.1. An Integrated Sustainability Appraisal (ISA) was undertaken alongside the development of the LTP4 to ensure that sustainability aspects were incorporated into the Plan. The ISA included the following assessments:
- Strategic Environmental Assessment (SEA);
  - Health Impact Assessment (HIA);
  - Habitats Regulations Assessment (HRA); and
  - Equalities Impact Assessment (EqIA).
- 1.2.2. Further details on these assessments and their relationship to the ISA of the LTP4 is provided in Section 1.3 below.
- 1.2.3. Strategic Environmental Assessments (SEA) are required by European Directive EC/2001/42 (SEA Directive), which was transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).
- 1.2.4. An SEA is mandatory for plans (including strategies) and programmes which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste or water management, telecommunications, tourism, town and country planning or land use, and which set the framework for future development consent of projects listed in the EIA Directive.
- 1.2.5. SEA is an iterative process of gathering data and evidence, assessment of environmental effects, developing mitigation measures and making recommendations to refine plans or programmes in view of the predicted environmental effects. The effects predicted at this stage have remained at a strategic level.
- 1.2.6. The ISA assessment presented a proportionate approach to a regional LTP4, assessing the policies (and contents there within) and potential corridors for further connectivity studies work. The ISA did not assess individual schemes.

### 1.3 RELATIONSHIP WITH OTHER PROCESSES

1.3.1. Figure 1-1 below sets out the relationship of the assessment components that make up the ISA.

**Figure 1-1 – ISA and Component Processes**



- 1.3.2. An **Equalities Impact Assessment (EqIA)** under the Equality Act 2010 has also been undertaken for the ISA. Public bodies have a duty to assess the impact of their policies on different population groups to ensure that discrimination does not take place and, where possible, to promote equality of opportunity. The approach adopted for the EqIA of the LTP4 was combined within the ISA process, with ‘equalities’ included as a topic for assessment alongside the environmental topics, as well as the production of a standalone EqIA.
- 1.3.3. A **Health Impact Assessment (HIA)** was undertaken for the ISA. Although health considerations are a requirement of the SEA Regulations, undertaking a separate HIA process is not a statutory requirement. However, due to the desire to undertake an integrated approach to considering sustainability in the LTP4, a separate HIA was undertaken. The approach adopted for the HIA of the LTP4 was to combine it within the ISA process, with ‘health’ included as a topic for assessment alongside the environmental topics.
- 1.3.4. A strategic level **Habitats Regulations Screening Assessment (HRSA)** was undertaken for the ISA in line with the Conservation of Habitats and Species Regulations 2010 (The Habitats Regulations) to consider whether the LTP4 may have significant impacts upon areas of nature conservation importance that are designated to be of European importance. Whilst feeding in to the ISA process (specifically the ‘biodiversity’ topic), the HRSA was undertaken as a standalone assessment.
- 1.3.5. It has not been possible to rule out the potential for significant effects on European sites associated with the LTP4 due to the strategic nature of regional transport strategies. Therefore, further, detailed assessment through additional screening and, if required, Appropriate Assessment is considered necessary to satisfy the requirements of the Habitats Regulations.
- 1.3.6. It will only be possible to undertake this level of assessment once specific schemes are proposed and sufficient geographical and project detail is available to identify the potential for effects and enable a thorough and robust analysis to be carried out.



## 1.4 PURPOSE OF THE POST ADOPTION STATEMENT

- 1.4.1. Post adoption statements are a key tool for improving transparency in the plan (or Plan) and decision-making process. This document allows stakeholders to see how environmental and sustainability factors have been considered throughout the development of the LTP4. It demonstrates how consultation comments have been taken into account throughout the process and outlines the measures for monitoring the significant environmental effects of implementing the Plan
- 1.4.2. The post adoption statement (PAS) satisfies a requirement of the SEA Regulations (Part 4, Regulation 16, [4]) which states that as soon as reasonably practicable after the adoption of a Plan, the following information is provided:
- How environmental considerations have been integrated into the plan or programme;
  - How the environmental report has been taken into account;
  - How opinions expressed in response to consultation have been taken into account;
  - The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
  - The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

## 2 HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED

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### 2.1 INTRODUCTION

- 2.1.1. Environmental considerations were integrated into the preparation of LTP4 throughout the ISA process. The identification of an ISA framework allowed likely significant positive and negative effects to be identified. This process assisted in the development of policies, driving them in a direction more likely to achieve sustainable development.
- 2.1.2. Environmental considerations of the draft policies and potential spatial corridors for future study work identified during the preparation of the Plan were also evaluated. Measures to avoid, reduce and, as much as possible, offset any significant adverse effects were incorporated into the development of the Plan. The process began with the preparation of the ISA Scoping Report to support the preparation of the draft Plan. Each stage of the ISA process informed and influenced the development of the Plan.

### 2.2 SCOPING

- 2.2.1. An ISA Scoping Report was prepared, which included: a review of relevant plans, policies and programmes; identification of the characteristics of the county and its key sustainability issues and opportunities; and an outline of the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the Plan. The Scoping exercise was proportionate to the nature of a county level local plan.
- 2.2.2. This work was used to develop the ISA Framework. The ISA Framework included 16 ISA objectives, which were compiled in order to guide the future assessment of policies and options.
- 2.2.3. Consultation with the Statutory consultees (Natural England, Historic England and the Environment Agency) on the Scoping Report took place between September – October 2021, which allowed the statutory consultees to provide comments on the scope of the ISA, baseline information, the proposed methodology and the ISA framework.
- 2.2.4. Comments were received from Historic England and Natural England on the ISA Scoping Report and are outlined in **Appendix A**. It should be noted that the Environment Agency did not provide comments.

### 2.3 ISA REPORT

- 2.3.1. For this stage each of the draft LTP4 policies and polices within the supplementary strategies were assessed against the ISA Framework. In addition, an EqIA, HIA, and HRA were carried out in order to inform both the ISA and the development of LTP4.
- 2.3.2. Following consultation with the public, statutory consultees and other stakeholders, between September and November 2022, a number of minor amendments and recommendations were identified. The ISA Report was updated to take into account consultation comments.

## 2.4 ENGAGEMENT WITH STAKEHOLDERS

- 2.4.1. Consultation was integral to the development of the Plan and the ISA process. Continuing engagement with stakeholders helped to ensure that consideration has been given to environmental and sustainability issues throughout the development of LTP4.
- 2.4.2. WCC engaged with its partners and a broad range of stakeholders during the development of the key themes, Outline LTP4, the development of the draft LTP4, the Plan consultation period and finalisation of the Plan.
- 2.4.3. Throughout most of the LPT4's development, a Citizens Panel (a representative group of 30 Warwickshire residents) was engaged in close evaluation and assessment. Together with other consultees, the responses given by this group have shaped the production of the LTP document.
- 2.4.4. In 2022, WCC engaged in an eight-week consultation period on the LTP (and ISA) from September to November, open to all interested parties. The consultation received over 300 responses.
- 2.4.5. Using feedback from the above consultation, a final LTP4 was developed, working alongside partners and stakeholders to ensure views were incorporated into the Plan during the development phase. The iterative drafts of the Plan and the ISA were used to inform the decisions of the Citizens Panel throughout the development of the Plan.

### 3 HOW THE RECOMMENDATIONS OF THE ISA HAVE BEEN TAKEN INTO ACCOUNT

- 3.1.1. The development of the ISA was iterative alongside the development of the LTP4, allowing for the ongoing assessment and refinement in the narrative and policies within the Plan. WCC utilised the outputs from the ISA to challenge and inform the LTP4 and to drive towards greater sustainability.
- 3.1.2. At each stage detailed consultation comments were considered by WCC before advising the Citizens Panel of any proposed changes. Monthly communications with WSP were also held throughout, further enabling the discussion and subsequent sound implementation of any proposed changes.
- 3.1.3. The ISA process (as documented in the ISA Report) helped to identify key issues and opportunities by gathering data and evidence. It proposed mitigation measures and made recommendations to refine the Plan in view of the predicted economic, social and environmental effects.
- 3.1.4. Finally, a monitoring framework has been developed, which sets out the strategic priorities and indicators. These indicators have been informed by the ISA and will help to assess the implementation of the LTP4 and identify significant environmental effects arising from implementation of the Plan.
- 3.1.5. Table 3-1 below outlines how the LTP4 took into account the ISA, at each of the key ISA stages.

**Table 3-1 – Integration of the ISA**

ISA Appraisal Stage	How the LTP4 has taken the ISA into account
Stage A: Setting the context and objectives, establishing the baseline and deciding on scope (the SA Scoping Report)	<p>The Scoping Report provided policy context, a baseline of Warwickshire County and identified key sustainability issues and opportunities, which fed into the development of the ISA Framework. The scoping report themes, issues and opportunities helped inform the development of the LTP4.</p> <p>A review by the ISA specialist team provided some initial thoughts and suggestions on the emerging LTP4, which was fed back to WCC.</p> <p>The feedback was utilised by WCC, taking the themes raised in the consultation to consider changes to the draft LTP4 ahead of consultation. Internal team check and challenge sessions were held to discuss the ISA scoping report feedback and proposed iterative changes. The proposed changes were presented to the Citizens Panel for agreement.</p>
Stage B: Developing and refining strategic alternatives and assessing their effects	<p>The assessment of the draft policy was undertaken, from which feedback was provided to WCC and amendments were made to the emerging Plan. Section 2.4 of this PAS outlines the engagement and iterative manner in which the development of the LTP4 was undertaken against the development of the ISA.</p> <p>An EqIA, HIA, and HRA also assessed the draft LTP4 which provided a number of recommendations which were taken into consideration within the further development of the LTP4.</p>

ISA Appraisal Stage	How the LTP4 has taken the ISA into account
<p>Stage C: Preparing the Environmental</p>	<p>The ISA Report sets out the results of the ISA – incorporating the SEA, HIA, EqIA, and a summary of the HRA Screening – and constitutes the ‘Environmental Report’ under the SEA Regulations.</p> <p>In addition, mitigation measures were proposed within the ISA Report in order to avoid or reduce the effects identified through the policy assessments.</p> <p>The ISA Report also presented a number of monitoring measures and indicators to help measure the sustainability outcomes of the LTP4, and to measure the performance of the Plan against environmental objectives and targets.</p>
<p>Stage D: Consulting on the draft plan or programme and the Environmental Report</p>	<p>The ISA Report was issued to consultees in September 2022 for an 8-week consultation period, alongside the LTP4. WCC sought the views of statutory bodies and other stakeholders on the results of the ISA.</p> <p>Following the consultation, a number of recommendations and amendments were suggested. In light of these comments an updated ISA Report was produced. New or revised policies within the updated draft of the LTP4 were also assessed.</p> <p>Themes for amendments arising from the ISA consultation were presented to the Citizens Panel for agreement.</p>
<p>Stage E: Monitoring the significant effects of implementing the plan or programme on the environment.</p>	<p>WCC will use a set of indicators to monitor the outcomes of the LTP4. The proposed indicators are set out in Table 6-1 of this document.</p> <p>These indicators will also be used to identify significant environmental effects arising from implementation of the Plan, building on those identified within the ISA.</p>

The ISA itself set out a list of key recommendation measures which were taken into consideration in the finalisation of the ISA Report. These have been outlined in Table 3.2 below.

**Table 3-2 - Specific ISA Recommendations**

Recommendations
<p>Details of the implementation phase of all policies would allow for a more accurate and fuller appraisal of effects in relation to ISA objectives. In particular, the ISA has appraised uncertain effects in some cases on ISA5-7, 10, 11, 14 and 15 due to lack of information on potential interventions to be implemented. As more information on the implementation of LTP4 becomes available, these policies should be revisited to reappraise the likely effects.</p>
<p>Incorporate mitigation recommendations detailed in <b>Section 8.1</b> into the draft LTP4. Key measures that are recommended to implement include, but are not limited to:</p> <ul style="list-style-type: none"> <li>■ Incorporate BNG and make use of the natural capital approach into the LTP4;</li> <li>■ Incorporate Air Quality Action Plans and Noise Action Plans into strategies;</li> <li>■ Incorporate clarity, commitments and targets in relation to climate greenhouse gas emissions, water quality and flood risk into LTP4;</li> <li>■ Update Warwickshire’s SFRA (from 2013) to reflect the baseline environment of LTP4</li> <li>■ Where possible, new developments should be located on brownfield land, or land that has previously been developed; and</li> <li>■ In the case of highway and freight interventions, if alternative interventions are not feasible, then avoidance of receptors should be pursued alongside appropriate measures for environmental and human receptors.</li> </ul>
<p>Incorporate monitoring recommendations detailed in <b>Section 8.2</b> into the monitoring framework of the draft LTP4. Key measures that are recommended to implement include, but are not limited to:</p> <ul style="list-style-type: none"> <li>■ Establishing a record for the number of biodiversity enhancement schemes implemented, the number of new green infrastructure projects and BNG;</li> <li>■ Monitoring of the loss of greenfield land or BMV to developments;</li> <li>■ Record the number of historic assets affected (negatively or positively) by the LTP implementation;</li> <li>■ Establish and monitor Warwickshire’s increase/decrease in carbon emissions; and</li> <li>■ Monitor air quality and noise within existing AQMAs and NIAs to ensure they do not exceed baseline levels.</li> </ul>
<p>Both the Motor Vehicle and Freight Strategies result in negative effects on multiple ISA objectives. The associated road interventions and new freight parks may result in negative effects in relation to biodiversity, air quality, cultural heritage, townscape and landscape, health, noise and GHG ISA objectives.</p> <p>It is recommended that the incorporation of these new highway and freight interventions be minimised where practicable to interventions that upgrade existing infrastructure with an aim to address congestion and improve safety. New road interventions and interventions with an aim to increase road freight capacity should be avoided as this will conflict with LTP4’s thematic aims.</p>

## Recommendations

The nature of the Motor Vehicle and Freight Strategies will not contribute to deliver the change in the transport network required to address the Climate Change Emergency or meet national targets for GHG emissions reduction given their encouragement of continued motor vehicle use.

While much of the plan shifts Warwickshire in the right direction to begin transformative change to shared, active travel, and public transport, the continued place of private fossil fuel vehicles as the primary mode of transport and the apparent intention to accommodate and promote road based freight as the primary freight delivery method remains a key barrier to achieving net zero.

It is recommended that interventions focusing on improving capacity of the road network for private motor vehicles road based freight is minimised and avoided where practicable. These interventions should only be pursued if alternatives have been considered and ruled out as not feasible.

Clear targets and commitments to BNG and biodiversity protection and enhancement are currently not included in LTP4. It is recommended that commitments are adopted and mitigation, in particular regarding protected sites and habitats, are further developed for the implementation phase of LTP4.

There are no statements within the draft LTP4 for how flood risk issues arising from the implementation of strategies would be mitigated. It is recommended that flood risk commitments be adopted within LTP4, with mitigation for flood risk being further developed.

The effects of the LTP4 on water resources in Warwickshire currently has a high proportion of uncertainty. Any interventions proposed that intersect water courses, come in close proximity to watercourses or do works in areas of groundwater have the potential to adversely affect water quality, ecology, geomorphology and hydrology of said watercourses. Targets regarding water quality preservation and enhancement should be included within LTP4, along with proposed methods for avoiding and mitigating adverse effects.

More information on the data collection and monitoring policies KP4, KP5, MS4 and MV2 is required, alongside details of how the collected data and review process will be utilised to inform developments would allow for a more accurate appraisal of these policies.

EqlA – It is recommended that inclusive stakeholder engagement is undertaken with relevant groups when appropriate to ensure that proposed interventions as a result of the implementation of these strategies, consider the needs of all protected characteristic groups.

EqlA/ HIA – It is recommended that the Public Transport Strategy incorporates fair pricing for public transport to ensure the needs and aspirations of groups with protected characteristics are considered, including those from low income households.

EqlA/ HIA- The Active Travel Strategy should ensure that active travel infrastructure should be accessible and inclusive for all groups. Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. This could be incorporated within the policies.

## 4 HOW OPINIONS EXPRESSED DURING CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

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### 4.1 INTRODUCTION

- 4.1.1. The SEA Directive requires consultation at various stages of the process and the responses to consultation to be taken into account during the preparation of the plan or programme and before its adoption. At each stage of the preparation of the Plan, the Plan and the ISA has been publicly consulted on, with statutory consultees (Environment Agency, Historic England and Natural England), the general public and other interested parties.
- 4.1.2. The consultation undertaken has been summarised in the sections below.

### 4.2 SCOPING CONSULTATION

- 4.2.1. The Scoping Report was issued for consultation to statutory consultees and other stakeholders for a five-week consultation period in September-October 2021. There were two responses to the consultation, from Historic England and Natural England
- 4.2.2. Consultation responses suggested wording changes to the SEA objectives; sought clarifications on methodology and how objectives were linked; and emphasised the historic and environment aspects of the ISA. Consultations also provided recommendations for the development of the LTP4.
- 4.2.3. Feedback arising from the ISA scoping consultation was used to inform decisions made by the Citizens Panel. The themes arising from the scoping consultation were outlined and advice provided was integrated into the development of the LTP4.
- 4.2.4. Comments were addressed in the main ISA Report and its subsequent appendices. A summary of the comments and corresponding actions taken is provided in Table 3-2 of the main ISA Report. Some comments and suggestions by the statutory bodies required a level of detail not currently available given the strategic nature of the Plan and the ISA and its focus on policies and tools rather than specific intervention. However, these suggestions should be considered in future scheme development and project level assessment stages and mitigation measures to that effect were incorporated into the ISA Report.

### 4.3 CONSULTATION ON THE ISA

- 4.3.1. The ISA Report was issued to consultees in September 2022 for an 8-week consultation period (24<sup>th</sup> September until 20<sup>th</sup> November), alongside the LTP4. WCC sought the views of statutory bodies and other stakeholders on the results of the ISA, via a survey.
- 4.3.2. WCC received a total of 305 responses to the LTP4 consultation survey, comprising a mix of online responses and additional written responses.
- 4.3.3. Within the survey, two questions directly related to the ISA were posed:
- to what extent do you agree with the assessment outcomes of the Integrated Sustainability Appraisal Report.
  - To what extent do you think the proposed measures are sufficient to address the outcomes in the Integrated Sustainability Appraisal



- 4.3.4. In total, 305 individuals responded to the ISA consultation via the online portal. Of the responses, 41% either agreed or strongly agreed with the outcomes of the ISA whereas 7.2% either disagreed or strongly disagreed strongly agreed with the assessment outcomes of the ISA.
- 4.3.5. Respondents then had the option to provide additional detail in relation to each assessment outcome. The SEA (45.9%) and HIA (45.6%) received the highest level of agreement from respondents to this question (either agreed or strongly agreed with these assessment outcomes). In contrast, 33.8% either agreed or strongly agreed with the EqIA.
- 4.3.6. Of the respondents, 23.9% either agreed or strongly agreed that the proposed measures are sufficient to address the outcomes in the ISA. A further 13.1% of responders either disagreed or strongly disagreed that the proposed measurements are sufficient to address the ISA outcomes. The remaining responses were either unsure or neither agreed or disagreed.
- 4.3.7. With regards to statutory consultees, both Historic England and Natural England provided written feedback to the ISA consultation, whilst the EA were contacted but provided no comments.
- 4.3.8. A number of specific technical ISA comments were raised as part of the consultation. The response to these is outlined in Section 4.5 - 'Changes to the ISA following consultation'.
- 4.3.9. A number of themes emerged from the ISA consultation. These themes were considered and additions and iterations made to the LTP4 (as outlined in Section 5.2 of this document).
- 4.3.10. Some of the predominant themes arising from the ISA/ LTP4 consultation were:
- Level of information about historic/ heritage assets (and access to these assets)
  - Access to green space and infrastructure
  - Health and wellbeing benefits of active travel
  - Upcoming environmental legislation
  - Water management
  - Ageing population (how is the ageing population accounted for)
  - Preservation of the visual landscape
  - Extreme weather events
  - De-carbonisation of the transport system
  - Accessibility (including affordability) and inclusion
  - Road safety and community Safety
  - Net gain principles
- 4.3.11. This PAS document has shown how the LTP4 and ISA were iterated over the development of the documents and the process of assessing alternatives. The level of assessment has been proportionate to the nature of the county level LTP4.

## 4.4 CHANGES TO THE LTP4 POST-CONSULTATION

- 4.4.1. Following consultation on the draft LTP4 and the ISA, changes were made to the LTP4, although they were not substantive changes to the content of the LTP4 documents.
- 4.4.2. Minor visual changes were made to the policy positions in all strategies, for consistency and to better differentiate them from general text. This involved putting every policy into an individual green box.

- 4.4.3. Although not a material change to LTP4, there was also a re-emphasis on the importance of the development of action plans and monitoring plans. Surrounding documentation, such as website text, will place a greater significance on these.

## **4.5 CHANGES TO THE ISA POST-CONSULTATION**

- 4.5.1. The ISA Report that was developed alongside the draft LTP4 was also subject to public consultation. Following the consultation few amendments were made to the ISA, with only minor wording/presentation comments being raised.
- 4.5.2. There were no substantive changes to the LTP4 or any of its strategies, therefore, there were no changes in significant effects and no additional assessment was required.
- 4.5.3. Further details on the comments received and the amendments made can be found in Appendix A.

## 5 REASONS FOR CHOOSING OPTIONS IN LIGHT OF OTHER REASONABLE ALTERNATIVES

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### 5.1 ASSESSMENT OF ALTERNATIVES

- 5.1.1. The SEA Act requires the identification and assessment of 'reasonable alternatives' to a plan. This can be used to achieve environmental benefits and, where well executed, can be an opportunity for the SEA to add value to the planning process by encouraging lateral thinking. Alternatives must be realistic and are likely to emerge from the plan-making process.
- 5.1.2. Specific reasonable alternative policies were not identified during the LTP4 policy generation process, therefore, the continuation of the existing LTP3 policies was assessed as a 'do nothing' scenario.
- 5.1.3. As per the SEA Regulations, the reasonable alternatives were considered to the same level of detail as the preferred option. Therefore, the assessment of alternatives was conducted using the same methodology applied to the assessment of LTP4 policies.

### 5.2 REASONS FOR CHOOSING LTP4 POLICIES

The assessment of alternatives resulted in a higher number of uncertain and negative effects than the LTP5 policies. The assessment highlighted that the majority of the LTP4 policies are outdated, no longer reflect global issues (in particular climate change and Covid-19) and are therefore not fit for purpose.

- 5.2.1. Positive effects however still remain in relation to the economy, health and wellbeing and community safety topics as the LTP3 still supports a push towards increase connectivity and accessibility, supports economic development and investment, active travel and improved safety.
- 5.2.2. The assessment made it clear that the majority of existing LTP3 policies required an update to deal with existing and emerging issues as well as new legislation and for these reasons, the LTP4 policies were the preferred option. The full detailed assessment can be found in Table 6.1 in the main ISA Report.

### 5.3 DEVELOPMENT OF POLICIES

- 5.3.1. Policies within the LTP4 were developed on an iterative basis.
- 5.3.2. Using the evidence base underpinning the LTP4, engagement with stakeholders and Citizen Panel, key messages from LTP4 consultation and assessment from the ISA, the policies were continually revised as the development of the draft LTP4 progressed.
- 5.3.3. The iterations of the policies presented to the Citizens Panel for decision in order to consider the impact and resulting changes to policies and narrative within the draft LTP4. This process took place throughout the development of the ISA and LTP4. The programme of engagement is outlined in Section 2.4 Engagement with Stakeholders.
- 5.3.4. The policies presented in the draft LTP4 for consultation were the culmination of the iterations to policies (and narrative) during the development of the LTP4.

## 6 HOW SIGNIFICANT EFFECTS FROM THE ISA WILL BE MONITORED

- 6.1.1. The SEA Regulations require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified, and remedial action taken.
- 6.1.2. The purpose of the monitoring is to provide an important measure of the environmental outcome of the plan, and to measure the performance of the plan against environmental objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage environmental information.
- 6.1.3. The proposed monitoring measures are set out in **Table 6-1** below.

**Table 6-1 – Monitoring Measures**

ISA Objective	What could be monitored
ISA5: Biodiversity	<p>The number of biodiversity enhancement schemes implemented through the LTP.</p> <p>Number of new green infrastructure projects associated with new developments.</p> <p>Seek the achievement of the biodiversity net gain through application of Natural England’s Biodiversity Metric 3.0<sup>2</sup></p>
ISA6: Natural Capital	Record the length of GI net gain through the transport network.
ISA7: Ecosystem Services	<p>Incorporate into Benefit Realisation Plans and collate a record of BNG and biodiversity enhancement provision for interventions throughout the lifetime of the plan.</p> <p>Record the biodiversity conditions arising from the reduced mowing and verge maintenance regimes across the transport network resulting from COVID-19 conditions. Similar areas where vegetation has been left unmanaged or managed in a reduce intensity should also be compared to previous regimes.</p>
ISA8: Landscape and Townscape	<p>The total loss of greenfield land to development.</p> <p>Landscapes benefiting from conservation and enhancement measure as a result of the LTP.</p>
ISA9: Historic Environments	The number of historic assets (statutory and non-statutory) negatively affected by the LTP.

<sup>2</sup> Natural England, Biodiversity Metric 3.0, 2021 [online] available at: <http://publications.naturalengland.org.uk/publication/6049804846366720> [last accessed: 04/08/21]

ISA Objective	What could be monitored
	The number of historic assets (statutory and non-statutory) benefiting from conservation and enhancement measure as a result of the LTP.
ISA10: Water Environment	Coordinate with EA monitoring of water quality and review annual results.
ISA11: Flood Risk	Monitoring around flood risk reduction and prevention targets as developed in the SFRA.
ISA12: Air Quality	To monitor levels of noise with existing AQMAs and ensure they don't exceed existing baseline levels.
ISA13: Climate Change and GHG's	<p>Baselining and measuring the Warwickshire plan area's aggregated carbon estimate and baseline measuring of air quality levels.</p> <p>Percentage increase / decrease in overall carbon emissions and air quality.</p>
ISA14: Land Use, Resource and Waste	To monitor the number of schemes promoting the reuse of existing infrastructure and/ or use of sustainable materials.
ISA15: Soils	<p>Review areas of brownfield land to determine if they are being utilised in support of the LTP4.</p> <p>Review areas of valuable agricultural land change over time to ensure that transport infrastructure and related developments are not responsible for reductions in area.</p>
ISA16: Noise and Vibration	Monitor the number of noise important areas. Develop Noise Action Plans to tackle specific arising issues if required.

# Appendix A

## CONSULTATION COMMENTS





**Table A-1 – Scoping Consultation Comments**

<b>Ref.</b>	<b>Consultee</b>	<b>Date Received</b>	<b>Comment</b>	<b>In Reference to?</b>	<b>Description of Action Taken</b>
1	Historic England	11/10/2021	Thank you for the opportunity to comment on the Warwickshire Local Transport Plan Integrated Sustainability Appraisal (ISA) Scoping Report.	General	Noted
2	Historic England	11/10/2021	As the Government’s adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on this Draft Sustainability Appraisal Scoping report as part of the early engagement in the process of preparing the LTP4.	General	Noted
3	Historic England	11/10/2021	The historic environment should be considered as part of the sustainability appraisal process. We recommend that these comments should be read alongside Historic England’s Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, 2016 (HEAN8). Our advice note provides more guidance to developing a robust sustainability appraisal framework.	General	Noted - Advice note has been considered.
4	Historic England	11/10/2021	Historic England welcomes the underlying aims of the key messages from the Policy Review, set out under the SA topic of ‘Historic Environment’, but also considers that opportunities to conserve heritage at risk should be specifically included here (as per section 5.8.3 of the report).	Section 4: Policy Context	Specific mention to conserving 'heritage at risk' has been included.
5	Historic England	11/10/2021	Additionally, we suggest that in some cases the wording could be amended to better reflect that of the NPPF. Phrases such as ‘sustaining and enhancing the significance of heritage assets’ (NPPF para.190) and ‘opportunities to enhance or better reveal’ the significance of Conservation Areas and	Section 4: Policy Context	Table 4-1 and Appendix A have been updated to reflect the latest NPPF



Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
			heritage assets (NPPF para.206) should be considered for inclusion.		
6	Historic England	11/10/2021	We also suggest that the term 'historical assets' should be amended to 'heritage assets' and that rather than referring to 'undesigned' heritage assets, the wording should be amended to 'non-designated' heritage assets. We therefore suggest that this section of the report is re-drafted to more closely align with Chapter 16 of the NPPF.	Section 4: Policy Context	Noted and amended throughout
8	Historic England	11/10/2021	It is important to note that previously unknown undesigned assets have the potential to be of national significance, on a similar level to that of a Scheduled Monument (NPPF, footnote 68).	Section 4: Policy Context	Noted - Added to Appendix A
9	Historic England	11/10/2021	Historic England also considers that mention should be made of the historic environment within the SA topic of 'Landscape and Townscape'.	Section 4: Policy Context	The contributions that cultural heritage makes to landscapes has been added to the landscape section.
10	Historic England	11/10/2021	We note that the Summary of 'Current Baseline' at paragraph 5.8.1 refers to 'Battle of Edgehill 1642 registered battleground'. This should be amended to refer to 'Registered Battlefield'.	Section 5: Baseline - 5-8 Historic Environment	Text has been updated
11	Historic England	11/10/2021	With regard to para.5.8.4, whilst it is technically correct to say that the Cotswolds AONB provides the setting for two World Heritage Sites (WHS), these being Blenheim Palace to the east and the city of Bath in the West, we note that both of these WHSs lie at some distance from the Warwickshire portion of the AONB and it is unlikely that development within Warwickshire would have any impact on the setting of these World Heritage Sites.	Section 5: Baseline - 5-8 Historic Environment	Agree - sentence has been removed





Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
12	Historic England	11/10/2021	With regard to the Historic Environment Sustainability Issues and Opportunities that have been identified in Table 5-13, we consider that the first and the third bullet points should have regard to footnote 68 of the NPPF, as non designated heritage assets of archaeological interest, which are of demonstrably equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets, with paragraph 201 of the NPPF advising that local planning authorities should refuse consent for development in such cases.	Section 5: Baseline - 5-8 Historic Environment	NPPF has been reviewed and used to inform these objectives. Table 5-13 has been updated.
13	Historic England	11/10/2021	We are pleased to see that the second bullet point includes consideration of the setting of heritage assets and that the last bullet point refers to the impact of vehicle damage and pollution on listed buildings and Scheduled Monuments.	Section 5: Baseline - 5-8 Historic Environment	Noted
14	Historic England	11/10/2021	However, we consider that the aim of reducing vehicle movements in historic areas should not be confined to urban areas alone, as many Scheduled Monuments are located in rural areas, and there are also many villages within Warwickshire's rural area where reducing vehicle movements, and thereby cutting pollution and vibration levels, would greatly benefit the historic environment.	Section 5: Baseline - 5-8 Historic Environment	Table 5-13 has been updated.
15	Historic England	11/10/2021	We welcome the recognition in bullet point 4 that ancillary features of transport infrastructure can adversely impact upon the setting of historic assets, and refer you to Historic England's publication "Streets for All", which gives advice on highway and public realm works, and can be accessed via the following link:  <a href="https://historicengland.org.uk/images-books/publications/streets-for-all/heag149-sfa-national/">https://historicengland.org.uk/images-books/publications/streets-for-all/heag149-sfa-national/</a>	Section 5: Baseline - 5-8 Historic Environment	Streets for All has been reviewed and included within Appendix A



Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
16	Historic England	11/10/2021	We also suggest that in this section the wording 'heritage assets' is used instead of 'historic assets', to better align with the terminology of the NPPF.	Section 5: Baseline - 5-8 Historic Environment	Amended throughout report
17	Historic England	11/10/2021	We welcome that identified within the 'Sustainability Opportunities' is that the LTP presents opportunities for enhancing the understanding and appreciation of the significance of above ground heritage assets. However, we consider that this opportunity should be expanded to include below-ground heritage assets, as traffic vibration can impact on archaeological remains and the development of new transport infrastructure can affect historic landscapes.	Section 5: Baseline - 5-8 Historic Environment	The sustainability issues have been updated to reflect this.
18	Historic England	11/10/2021	With regard to the second identified opportunity focused on cultural heritage assisting to increase tourism and revenue within the County, Historic England is strongly supportive of opportunities for new transport measures to promote and enhance access to, and enjoyment of, the historic environment.	Section 5: Baseline - 5-8 Historic Environment	Noted
19	Historic England	11/10/2021	Historic England welcomes the recognition in the second identified opportunity that by increasing access to the countryside through transport schemes, better appreciation of historic landscape assets can be enabled through creating new views and vistas. This is reflective of the NPPF paragraph 206, which advises local planning authorities to look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance.	Section 5: Baseline - 5-7 Landscape and Townscape	Noted
20	Historic England	11/10/2021	However, we also suggest that historic landscapes are also referred to in the 'Sustainability Issues' section of this topic.	Section 5: Baseline - 5-7	The sustainability issues have been updated to reflect this.



Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
				Landscape and Townscape	
21	Historic England	11/10/2021	With regard to Table 6-1; Sustainability Appraisal Framework, Historic England welcomes Objective SA9: “To protect and enhance the historic environment, including heritage assets (designated and non-designated) and their unique settings”, but suggest that the word ‘protect’ is amended to ‘conserve’.	Section 6: Sustainability Framework	Table 6-1 has been updated
22	Historic England	11/10/2021	We are also supportive of Objective SA8: “To protect and enhance Warwickshire’s townscapes and landscapes, including both the rural environment and town centres”.	Section 6: Sustainability Framework	Noted
23	Historic England	11/10/2021	Historic England considers that decision-making criteria should also be added to this section and suggest that the following examples of appropriate criteria are included within the SA for the LTP4 to reflect a range of sustainability issues regarding the historic environment: Will the policy or proposal <ul style="list-style-type: none"> <li>• Conserve and/or enhance heritage assets, their setting and the wider historic environment?</li> <li>• Contribute to the better management of heritage assets and tackle heritage at risk?</li> <li>• Improve the quality and condition of the historic environment?</li> <li>• Respect, maintain and strengthen local character and distinctiveness?</li> <li>• Promote high quality design?</li> <li>• Alter the hydrological conditions of water-dependent heritage assets, including organic remains?</li> </ul>	Section 6: Sustainability Framework	Table 6-1 has been updated to include supporting questions to aid assessment. Some suggestions have been included, however, not all as there are some limits to what is achievable by the LTP.
24	Historic England	11/10/2021	Social: will the policy or proposal <ul style="list-style-type: none"> <li>• Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment?</li> </ul>	Section 6: Sustainability Framework	Table 6-1 has been updated to include supporting questions to aid assessment. Some suggestions have been included, however, not

Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
			<ul style="list-style-type: none"> <li>• Improve the satisfaction of people with their neighbourhoods as places to live?</li> <li>• Engage communities in identifying culturally important features and areas?</li> <li>• Provide for increased access to and enjoyment of the historic environment?</li> <li>• Provide for increased understanding and interpretation of the historic environment?</li> <li>• Provide access to new leisure, recreational, or cultural activities?</li> <li>• Support and widen community uses through increased access to shared facilities?</li> </ul>		all as there are some limits to what is achievable by the LTP.
25	Historic England	11/10/2021	<p>Economic: will the policy or proposal</p> <ul style="list-style-type: none"> <li>• Increase the economic benefit derived from the historic environment?</li> <li>• Promote heritage-led regeneration?</li> <li>• Lead to the repair and adaptive re-use of a heritage asset and encourage high quality design?</li> <li>• Make the best use of existing physical infrastructure, including buildings where possible?</li> <li>• Assist in promoting heritage based sustainable tourism?</li> </ul>	Section 6: Sustainability Framework	Table 6-1 has been updated to include supporting questions to aid assessment. Some suggestions have been included, however, not all as there are some limits to what is achievable by the LTP.
26	Historic England	11/10/2021	<p>Historic England also considers that the historic environment should be brought into other SA objectives and questions. For example:</p> <ul style="list-style-type: none"> <li>• Water – will the transport scheme/infrastructure impact the preservation of a waterlogged archaeological site?</li> <li>• Soil – Will the transport scheme/infrastructure impact the historic environment through issues such as contamination, changes to the preservation conditions on a site etc.</li> </ul>	Section 6: Sustainability Framework	Table 6-1 has been updated to include supporting questions to aid assessment. Some suggestions have been included, however, not all as there are some limits to what is achievable by the LTP.
27	Historic England	11/10/2021	Overall, Historic England considers that the amendments to the SA framework, as set out above, are necessary to ensure	General	Noted



Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
			that it meets the requirements of the Directive and Legislation in relation to heritage.		
28	Historic England	11/10/2021	The changes suggested will ensure compliance in this respect and will ensure the development of an appropriate framework for assessing the significant effects which this Transport Plan may have upon the historic environment of Warwickshire.	General	Noted
29	Natural England	12/10/2021	Natural England welcomes this Integrated Sustainability Appraisal (ISA) Scoping Report. We set out some more detailed comments below on issues that would benefit from further consideration. In all other respects we are satisfied that the proposed ISA framework and draft methodology are fit for purpose with respect to those themes within our remit: <ul style="list-style-type: none"><li>• Biodiversity &amp; geodiversity</li><li>• Landscape</li><li>• Natural Resources (air, soil and water)</li></ul>	General	Noted
30	Natural England	12/10/2021	A recent EC judgement usually known as the Holloman case (Case C-461/17 Holohan v An Bord Pleanála 7/11/18) has highlighted the importance of an EIA or HRA considering impacts on habitat types and mobile species which are associated with a European designated site, but located outside of its boundaries.	HRA	Noted - This information has been passed on to our HRA tea.
31	Natural England	12/10/2021	The Plan area falls primarily within two hydrological catchments, associated with the Severn and the Humber estuaries respectively. The Severn Estuary Special Area of Conservation and Ramsar Site is hydrologically linked to the designated site through the Warwickshire River Avon, while the Humber Estuary is linked through the rivers Cole, Anker, Tame and Blythe.	HRA	This has been added to the Water Environment section of the baseline.

Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
32	Natural England	12/10/2021	The Severn Estuary migratory fish species (including Atlantic salmon, Sea trout, Allis Shad, Twaite Shad, Sea lamprey, River lamprey and European eel) travel upstream through the River Severn and its tributaries, spending part of their life-cycle in the wider Severn hydrological catchment.	Section 5: Baseline - Water Environment	This information has been noted, however, we're aiming to keep the Scoping Report at a strategic level. As this is an ISA of a LTP we have decided to not include this information. It is not the responsibility of the LTP to deal with this issue.
33	Natural England	12/10/2021	Currently the tidal weir at Tewkesbury is believed to present an obstacle to most of the migratory fish species apart from the European eel, which has been recorded in the Warwickshire Avon. In the last few decades eel numbers have declined internationally by as much as 95% and have been listed by the International Union for Conservation of Nature (IUCN) on their Red List as critically endangered species. Barriers to their journey upstream and degradation of habitat and pollution are some of the contributing factors for the decline. The Humber Estuary migratory fish species are the Sea lamprey and River Lamprey. The River lamprey has been recorded as far upstream as the R. Dove (Staffordshire/Derbyshire).	Section 5: Baseline - Water Environment	This information has been noted, however, we're aiming to keep the Scoping Report at a strategic level. As this is an ISA of a LTP we have decided to not include this information. It is not the responsibility of the LTP to deal with this issue.
34	Natural England	12/10/2021	The removal or modification of existing weirs to facilitate fish passage is identified as a key action in River Basin Management Plans under the Water Framework Directive. In view of the mineral plan's timeframe, the 25 year Environment Plan's, ( <a href="https://www.gov.uk/government/publications/25-year-environment-plan">https://www.gov.uk/government/publications/25-year-environment-plan</a> ), 'nature recovery' objectives and in line with the Severn and Humber Estuaries' conservation objectives	Section 5: Baseline - Water Environment	This information has been noted, however, we're aiming to keep the Scoping Report at a strategic level. As this is an ISA of a LTP we have decided to not include this information. It is not the responsibility of the LTP to deal with this issue.



Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
35	Natural England	12/10/2021	consideration should be given to opportunities to maintain and restore the above named rivers' and tributaries' habitat features for the relevant migratory fish species.	Section 5: Baseline - Water Environment	This information has been noted, however, we're aiming to keep the Scoping Report at a strategic level. As this is an ISA of a LTP we have decided to not include this information. It is not the responsibility of the LTP to deal with this issue.
36	Natural England	12/10/2021	In addition to European eel, the Warwickshire Avon and its tributaries are believed to offer scope for species such as River lamprey, Sea lamprey, Atlantic salmon and Sea trout. Similar scope is believed to exist during the plan's lifetime for River lamprey to reach the Warwickshire tributaries of the Humber Estuary.	Section 5: Baseline - Water Environment	This information has been noted, however, we're aiming to keep the Scoping Report at a strategic level. As this is an ISA of a LTP we have decided to not include this information. It is not the responsibility of the LTP to deal with this issue.
37	Natural England	12/10/2021	Maintaining or achieving a good1 standard of water quality and sufficient flows is a necessary consideration when considering the potential impact of plans and projects on functionally linked watercourses and longer term there should be an aspiration to restore connectivity by removing barriers and to improve the quality of our freshwater habitats.	Section 5: Baseline - Water Environment	This has been included within the opportunities for the Water Environment - Table 5-16.
38	Natural England	12/10/2021	We advise that summary of current baseline describing biodiversity and natural capital should be updated to reflect this emerging theme.	Section 5: Baseline - Water Environment	Where appropriate, the water environment section of the baseline have been updated with the information provided.
39	Natural England	12/10/2021	With regard to soils and 'best and most versatile land' (Agricultural Land Classification grades 1, 2 and 3a) we note the summary of current baseline does not distinguish between	Section 5: Baseline - Soils and Resources	The text has been updated and differentiate 3a from 3b.

Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
			<p>ALC grades 3a (BMV) and 3b (which is not BMV). The following information may be useful in order to establish whether mapping evidence is available to address this:</p> <p>The 1:250 000 ALC dataset can be downloaded from the Natural England website <a href="http://www.gis.naturalengland.org.uk/pubs/gis/GIS_register.asp">http://www.gis.naturalengland.org.uk/pubs/gis/GIS_register.asp</a> (there is also a link from the Magic website). The post 1988 ALC data layer (which shows a subdivision of Grade 3) can also be made available, by contacting <a href="mailto:Naturalenglandgidatamanagers@naturalengland.org.uk">Naturalenglandgidatamanagers@naturalengland.org.uk</a> . Both these data sets are also available to download from <a href="http://www.geostore.com/environment-agency/">http://www.geostore.com/environment-agency/</a> .</p>		
40	Natural England	12/10/2021	The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment and suggest appropriate avoidance or mitigation measures where applicable.	General	The LTP's effects on the natural environment will be considered at the next stage of the ISA, where mitigation and monitoring measures will be identified.
41	Natural England	12/10/2021	Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.	General	Noted. These effects will be considered within the ISA assessment.
42	Natural England	12/10/2021	The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required.	General	Noted. This information will be used to inform the next stage of the ISA.





Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
			We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic <sup>2</sup> , which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.		
43	Natural England	12/10/2021	We note the summary of current baseline describing biodiversity and natural capital does not include reference to the Local Wildlife Sites. We advise that current baseline should be updated to describe these local designations (NPPF para 179 a))	Section 5: Baseline - Biodiversity and Natural Capital	The baseline has been updated to include LWS.
44	Natural England	12/10/2021	Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area; <ul style="list-style-type: none"><li>• Green infrastructure strategies</li><li>• Biodiversity plans</li><li>• Rights of Way Improvement Plans</li><li>• Shoreline management plans</li><li>• Coastal access plans</li><li>• River basin management plans</li><li>• AONB and National Park management plans.</li><li>• Relevant landscape plans and strategies</li></ul>	Appendix B	Appendix B has been updated to reflect these proposed plans.



**Table A-2 – ISA Consultation Comments**

Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
1	Historic England	01/11/2022	Thank you for the opportunity to comment on the Warwickshire Local Transport Plan 4 Integrated Sustainability Appraisal (ISA) Report, September 2022.	General	Noted
2	Historic England	01/11/2022	As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on this Integrated Sustainability Appraisal Report as part of the early engagement in the process of preparing the LTP4.	General	Noted
3	Historic England	01/11/2022	These comments should be read in conjunction with our comments made on the ISA Scoping Report via our letter dated 11 <sup>th</sup> October 2021. In relation to the ISA Report Historic England has the following comments:	General	Noted
4	Historic England	01/11/2022	Historic England welcomes that the historic environment has been considered as part of the sustainability appraisal process and is pleased to see that many of our comments and suggestions regarding the ISA Scoping Report of October 2021 have been taken on board.	General	Noted
5	Historic England	01/11/2022	Historic England's Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, 2016 (HEAN8), remains our key guidance to developing a robust sustainability appraisal framework and can be via the following link: <a href="#">Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment</a>	General	Noted
6	Historic England	01/11/2022	Historic England strongly supports the vision for outcomes of the four key themes for LTP4 and is particularly supportive of the LTP's role in reducing carbon emissions and place shaping.	Section 2: The Warwickshire Transport Plan – 2.2 Elements of the	Noted



Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
				Transport Strategy	
8	Historic England	01/11/2022	Historic England welcomes that the need to seek opportunities to conserve heritage at risk has now been included within Table 4.1 'Key Messages from Policy Review' under the ISA topic of 'Historic Environment', as well as reference to unknown heritage assets and archaeological remains now being included. We are also pleased to see that some of the wording of these key messages has been amended to better reflect that of the NPPF.	Section 4: SA Context & SA Framework	Noted
9	Historic England	01/11/2022	With regard to Table 4.2 'Key Sustainability Issues and Opportunities' we welcome that the text has been amended to reflect many of our previous comments.	Section 4: SA Context & SA Framework	Noted
10	Historic England	01/11/2022	We welcome that in Table 4.3 - ISA Appraisal Framework, the wording of Objective ISA9 has been amended from ' <i>protect</i> ' to ' <i>conserve</i> ' and that many of our suggested decision-making criteria have been included under this objective.	Section 4: SA Context & SA Framework	Noted
11	Historic England	01/11/2022	Table 5-2 - Draft LTP4 Plan Assessment Summary – we concur with the assessment findings that in relation to Objective ISA9 the effects on the historic environment will be highly dependent upon the types of interventions that come forward as a result of LTP4.	Section 5 (and Appendix A): Assessment of LTP Draft Strategy Policies	Noted
12	Historic England	01/11/2022	Table 6-1 - Assessment of Alternatives - continuation of LTP3 'do nothing' scenario – under the 'Summary of Effects' relating to Objective ISA9 we suggest amending the wording from " <i>The highly valuable cultural and historical environment in Warwickshire gives way to the importance of its conservation and enhancement</i> " to " <i>....in</i>	Section 6: Assessment of Alternatives	Table 6-1 text has been amended

Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
			<i>Warwickshire means that its conservation and enhancement is of the utmost importance”, or similar.</i>		
13	Historic England	01/11/2022	Historic England agrees with the assessment that the policy encompassed within LTP3 relating to the conservation of heritage assets is not inclusive of Warwickshire’s many heritage assets and does not promote their enhancement. We therefore welcome the more inclusive approach of LTP4 with regard to the historic environment.	Section 6: Assessment of Alternatives	Noted
14	Historic England	01/11/2022	Table 7-1 - Cumulative effects – with regard to Objective ISA9 Historic England considers that a comprehensive range of potential cumulative effects has been identified and also welcomes recognition of cross-linkages between the historic environment, health and wellbeing and placemaking.	Section 7: Assessment of Cumulative Effects	Noted
15	Historic England	01/11/2022	Table 8-1 – Proposed Mitigation and Enhancements – Historic England welcomes the mitigation measures identified and the opportunities for enhancement of the historic environment. The LTP is seen as a lever for improvements in landscapes and townscapes and will be an integral part of place shaping; therefore, opportunities for mitigation and enhancement should be grasped.	Section 8: Mitigation, Enhancements and Monitoring	Noted
16	Historic England	01/11/2022	Table 9-1 - Recommendations for LTP4 – we welcome the recommendation to incorporate the monitoring recommendations detailed in Section 8.2 of the Report into the monitoring framework of the draft LTP4, and in particular the recommendation to record the number of historic assets affected (negatively or positively) by the implementation of the LTP.	Section 9: Recommendations	Noted



Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
17	Historic England	01/11/2022	<i>Historic Environment –</i> Historic England considers that Appendix E to the ISA Report sets out a fairly comprehensive list in relation to the historic environment.	Appendix E: Review of Plans, Policies and Programmes	Noted
18	Historic England	01/11/2022	<i>Historic Environment –</i> However, Historic England notes that as we previously stated there are a number of Conservation Area Character Appraisals and Management Plans for settlements within Warwickshire and we consider that these should be included within the Source Documents in Table E-1 of Annex E to the ISA Report.	Appendix E: Review of Plans, Policies and Programmes	Appendix E has been updated to include Conservation Area Character Appraisals and Management Plans for settlements within Warwickshire
19	Historic England	01/11/2022	<i>Landscape and Townscape –</i> We also suggest that the Warwickshire Historic Landscape Characterisation Project is also referenced as a Regional/Local source document.	Appendix E: Review of Plans, Policies and Programmes	Appendix E has been updated to include this reference
20	Historic England	01/11/2022	Overall, Historic England considers that the amendments to the ISA Report, as set out above, are necessary to ensure that it meets the requirements of the Directive and Legislation in relation to heritage. The changes suggested will ensure compliance in this respect and will ensure the development of an appropriate framework for assessing the significant effects which this Local Transport Plan may have upon the historic environment of Warwickshire.	General	Noted
21	Historic England	01/11/2022	Historic England would be happy to provide further comments as the Warwickshire Local Transport Plan 4 Sustainability Appraisal is progressed over the coming months. We would like to stress that the above opinion is based on the information provided in this consultation.	General	Noted



Ref.	Consultee	Date Received	Comment	In Reference to?	Description of Action Taken
22	Historic England	01/11/2022	To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation, or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.	General	Noted
23	Natural England	15/11/2022	Thank you for your consultation on the above which was received by Natural England on 29 September 2022.	General	Noted
24	Natural England	15/11/2022	Natural England welcomes the Integrated Sustainability Appraisal (ISA) report which assesses seven strategies and its policies proposed in the Warwickshire Local Transport Plan 4 (LTP4).	General	Noted
25	Natural England	15/11/2022	In general, we consider that the report has covered our interests in the natural environment and followed an appropriate methodology. We note the ISA has identified uncertain effects on the objectives related to the natural environment due to lack of information on the potential interventions to be implemented. We therefore welcome mitigation and monitoring recommendations in Sections 8.1; 8.2 and fully support recommendations for the LTP4 outlined in Table 9-1.	General	Noted
26	Natural England	15/11/2022	We understand that the Habitat Regulations Assessment is currently being undertaken and will be submitted for the consultation separately.	General	Noted





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