

Draft Revised Mayor's Transport Strategy Integrated Impact Assessment: Appendix A: Scoping Report Responses from Statutory Consultees

Report for Transport for London

MVA in Association With ERM and Future Inclusion

October 2009



mvaconsultancy

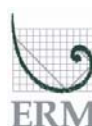
Appendix A – Scoping Report Responses from Statutory Consultees

1 Summary of IIA Consultation Responses

The Scoping Report was subject to a five week consultation period, this being undertaken in the period 25 February – 1 April 2009. The Scoping Report was formally distributed to the three statutory consultees, Natural England, English Heritage and the Environment Agency, for comment. The responses to this consultation were collated and Table A.1 provides a summary of headline issues arising from this.

Table A.1 Scoping Report Responses from Statutory Consultees

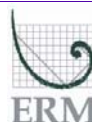
Comments	How the Comments Have Been Addressed
Natural England	
Happy with the current scope of the IIA and have nothing further to add at this stage.	No action required.
English Heritage	
Request that the London Boroughs' own conservation staff are closely involved throughout the preparation of the Draft Revised Mayor's Transport Strategy (MTS) and associated IIA, as they are often best placed to advise on local heritage matters	The Draft Revised MTS deals with the broad strategic coverage of all of London. The subsequent LIPS will address local level delivery and the opportunity exists for local conservation officers to engage at this point. Engagement between EH's officer and TfL has occurred and will continue to occur going forward.
Welcome the reference and recognition given to historic environment as a valuable contributor to London's cultural identity. Would like to expand the range of heritage assets discussed in the text to encompass non-statutory assets as well as their settings and wider historic environment. Also important to explore opportunities for enhancement for all assets.	Comments addressed in the Scoping Report, and within Chapter 4/Appendix B of this report.



Comments	How the Comments Have Been Addressed
<p>Reference is made to London's open spaces. Noting that many of these spaces, especially its Squares are identified as Registered Parks and Gardens and or covered by the London Squares Act have a recognised heritage value Non-designated spaces also have an important role in local distinctiveness and should be recognised as such.</p>	<p>Comments addressed in the Scoping Report, and within Chapter 4/Appendix B of this report.</p>
<p>EH endorse the reference to places with heritage providing social and economic benefits and the potential impact of transport provision in enhancing or diminishing its value.</p>	<p>Comments addressed in the Scoping Report, and within Chapter 4/Appendix B of this report.</p>
<p>Welcomed that PPG15 Planning and the Historic Environment has been included in the review of plans and programmes, noting also section 5 Transport and Traffic Management, and PPG16 Archaeology and Planning (1990).</p>	<p>Comments addressed in the Scoping Report, and within Chapter 4/Appendix C of this report.</p>
<p>EH noted policy guidance on Transport and the Historic Environment (2004), and Streets for All guidance manual should be reviewed.</p>	<p>Comments addressed in the Scoping Report, and within Chapter 4/Appendix C of this report.</p>
<p>Framework for Evaluating Impacts of the Strategy</p> <p>EH noted that the Assessment Framework should consider heritage assets, their settings and the wider historic environment. This includes buildings, spaces and structures that are not statutorily protected but have a local value and contribute to a sense of place. EH also noted that it is important to explore how the Draft Revised MTS will provide opportunities for enhancement of all assets of heritage value.</p>	<p>Assessment framework updated to take on board the role of non-designated sites and assets, as well as those with designated status.</p>
<p>Appendix B - Supporting Data for Baseline</p> <p>Cultural Heritage, including architectural and archaeological heritage:</p> <ul style="list-style-type: none"> ■ Ensure the inclusion of key heritage assets, including Conservation Areas, Archaeology Priority Areas and locally listed buildings. ■ Differentiate the grades of heritage assets, such as listed buildings and Registered Parks and Gardens (grade I, II* and II), and the extent of coverage of all heritage assets. ■ Reference should be made to Conservation Area or Listed Building Management Plans, as they may 	<p>The Draft Revised MTS has a high level, strategic focus and the IIA is commensurately strategic in focus. The IIA therefore does not get into the level of detail of impacts on individual conservation areas, local authority APAs, locally listed buildings or grade I, II* or III statutorily listed buildings.</p> <p>However, the assessment notes that all these assets are a critical part of London's overall heritage value, and the IIA gives regard to, in a</p>



Comments	How the Comments Have Been Addressed
<p>contain policies and proposals which will have a direct or indirect impact upon the Draft Revised MTS.</p>	<p>strategic way, how the Draft Revised MTS may affect these assets.</p>
<p>Environment Agency</p>	
<p>EA are happy that the Scoping Report is comprehensive in the identification of key sustainability issues and provision of baseline information. 'It sets out a sensible assessment framework with which to assess the sustainability of the Mayor's Transport Strategy'.</p>	<p>No action required.</p>
<p>EA note that the key sustainability issues appear to have been included and the proposed appraisal framework set out in the tables in Section 6 is fairly comprehensive. EA note the following 'few minor points':</p> <ul style="list-style-type: none"> ■ The need to reduce car use should be emphasised as part of the third bullet point under objective C3 on page 39 of the Scoping Report. This is to ensure consistency with other transport policies and plans e.g. Building sustainable transport into new developments, Department for Transport (2008). ■ The fifth bullet point under objective F1 on page 41 - Promote smart travel options for all, including reducing distance travelled and the need to travel, as well as promoting more sustainable modes of travel? - should for consistency also appear under objectives C3 and C1. 	<p>a) The Assessment Framework was expanded to explicitly note 'car use' and Monitoring Chapter of this IIA Report refers to 'car use' indicator.</p> <p>b) Reference has not been made to smart travel options under objective C1, as the primary emphasis within this section was to address barriers to health and well-being – smart travel options representing an opportunity not barrier in this sense.</p> <p>Explicit reference to travel 'options' as well as 'modes' has, however, been included under objective C3 since it aligns with the emphasis upon opportunities for enhancement which this section addresses.</p>
<p>As a major source of air pollution in London is from road traffic, it is important that close links are made between the Mayor's Air Quality Strategy and the Transport Strategy. Poor air quality impacts on the health and well being of London's population and the physical environment and public realm.</p> <p>Specific comments relating to the inclusion of air quality issues in the Scoping Report:</p> <ul style="list-style-type: none"> ■ The baseline information provided in the main document relating to air quality (Section 4.8) and in Appendix B should include relevant standards and concentrations for ozone as levels of this pollutant are rising in London. ■ Appendix B should include air quality concentration 	<p>Comments addressed in the Scoping Report, and within Chapter 4/Appendix B of this report.</p>



Comments	How the Comments Have Been Addressed
<p>maps for London for NO₂, PM₁₀ and Ozone either in the section on Health & Well Being or Physical, Historic, Archaeological and Socio-cultural environment and Public Realm.</p>	
<p>Address all likely trends in relation to air quality including:</p> <ul style="list-style-type: none"> ■ London's Transport System - There will be an increase in air pollution. ■ Health and Well Being – There will be an increase in respiratory diseases. ■ Physical Environment and Public Realm – Local pollution levels will rise. If CO₂ and noise will increase it follows that air pollution will get worse. 	<p>Comments addressed in the Scoping Report, and within Chapter 4/Appendix B of this report.</p>
<ul style="list-style-type: none"> ■ Include new EU Directive on air quality - Directive 2008/50/EC on ambient air quality and cleaner air for Europe. ■ Refer to UK National Air Quality Strategy 2007. ■ Ensure latest draft of London Plan is included. 	<p>Comments addressed in the Scoping Report, and within Chapter 4/Appendix C of this report.</p>
<ul style="list-style-type: none"> ■ Ensure that a range of reasonable alternatives are assessed as part of the IIA process. This will help test the Mayor's current proposals, for example, his decision not to extend the congestion charge or to go ahead with Stage 3 of the London Low Emission Zone (LEZ), and to highlight their environmental impacts. 	<p>Comments addressed in Chapter 2, Chapter 6 and Appendix D of this IIA Report.</p>

