LOCAL TRANSPORT PLAN

SEA Adoption Statement

FIFTH PLAN: *STRIKING THE BALANCE*
December 2024

Kent County Council
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Highways and Transport
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1. Introduction

1.1. We have a statutory duty to prepare a Local Transport Plan (LTP). Our new, fifth, Local Transport Plan is called Striking the Balance. The Strategic Environmental Assessment has been prepared by Aecom on behalf of the County Council as part of the process of developing the Plan.

1.2. The LTP is our main policy on transport and supports delivery of our long term Council-wide plan *Framing Kent's Future* and our financial strategy *Securing Kent's Future*. Our LTP details our ambition, the outcomes we want to achieve, and the proposals we aim to progress to deliver the LTP.

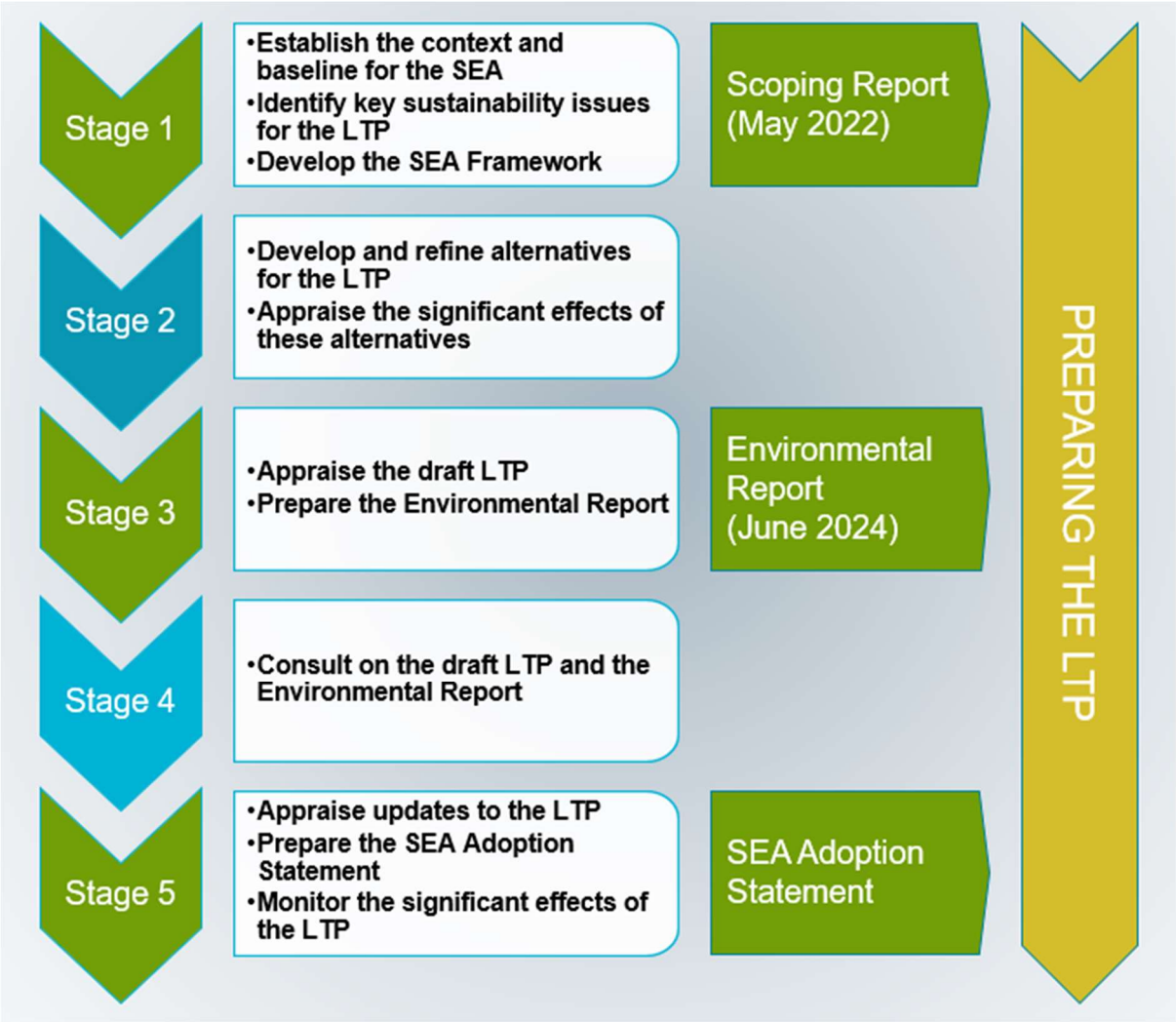
1.3. Our Strategic Environmental Assessment (SEA) fulfils the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the Strategic Environmental Assessment Regulations). The Strategic Environmental Assessment is a systematic process that aims to ensure that potential environmental effects are given consideration in the plan making process. We have published our Strategic Environmental Assessment on the Kent County Council website page that also provides access to the LTP.

1.4. This is the SEA Adoption Statement which, as the Plan-making authority, is a requirement for us to produce as the final output of the SEA process for our LTP. According to article 9 of the SEA Regulations, the statement must include a description of the following which is set out in the subsequent sections of this statement:

1.4.1. How environmental considerations have been integrated into the LTP development process.
1.4.2. How we have taken the SEA into account.
1.4.3. How opinions expressed in response to our SEA have been taken into account.
1.4.4. The reasons for our choosing the LTP as adopted, in the light of the other reasonable alternative options dealt with in our SEA.
1.4.5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan.

2. How environmental considerations have been integrated into the LTP

2.1. The SEA process for the LTP has been undertaken through a five stage process. The stages, and key outputs, are set out below.



2.2. Baseline data and a review of the plans, programmes and policies were presented in the SEA Scoping Report (released for consultation in January 2022 and updated in May 2022) with the information subsequently summarised in Appendix A of the SEA Environmental Report (June 2024). These formed the evidence base for the SEA, and comprised part of the evidence base for the LTP. These were used to develop an SEA Framework (contained in Table 2.2 (pg. 15) of the Environmental Report for assessing the impacts of proposals within our plan. The framework covers:

2.2.1. Biodiversity, flora and fauna
2.2.2. Air Quality
2.2.3. Population and human health

2.2.4. Climatic factors
2.2.5. Soil and water Quality
2.2.6. Cultural heritage
2.2.7. Landscape, noise and tranquillity
2.2.8. Material assets

2.3. The SEA has taken place in parallel with the Plan and its recommendations have been taken into account throughout the stages of development of the plan including consultation feedback on those as explained in further detail in section 3.

3. How we have taken the SEA into account.

3.1. **At Scoping Stage**

3.2. At the scoping stage the policies and baseline data included in the SEA Scoping Report was used to inform the wider evidence base documentation (including the Health Impact Assessment, Equalities Impact Assessment, and the Supporting Evidence Base document) and these are also published on our council webpage concerning the LTP. This ensured that the relevant environmental topics were identified and considered alongside other social and economic considerations.

3.3. This has meant factors such as human health associated with transport and movement, including the wider determinants of health and the role of transport within those, the impacts of noise from transport (including associated with aviation reflected by the LTP proposal concerning Gatwick Airport expansion) were considered.

3.4. Our Supporting Evidence Base and accompanying assessments and our LTP reference and demonstrate consideration of air quality considerations as well as climatic factors including a consideration of both flood risk areas across the county, carbon emissions from transport use and capital delivery, and landscape in the form of designated and protected areas such as the National Landscapes.

3.5. The scope of the SEA was identified at the scoping stage and consultation was undertaken with statutory bodies in early 2022 to seek their feedback.

3.6. **At SEA stage**

3.7. Our SEA Framework for assessing and informing development of our LTP was developed during the Scoping phase with conscious consideration of the consultation feedback, detailed in Table 2.1 (pg.8) of the Environmental Report and applied to the assessment of the LTP proposals during our formative stages of plan development including public consultation in 2024.

3.8. Our SEA included assessment of:

3.8.1. The reasonable alternatives for the LTP5
3.8.2. The strategic options for the built-up urban areas of Kent
3.8.3. The strategic options for the inter urban areas / rural swathe of Kent
3.8.4. The proposals developed for the Local Transport Plan.
3.8.5. Cumulative effects with other plans and programmes

3.9. A key requirement of the SEA Regulations is to assess 'reasonable alternatives' for the LTP5 which is why we considered reasonable alternatives through a two-stage approach of the strategic options for the built-up urban areas and the inter urban areas / rural swathe of Kent. This enabled us to consider whether the focus of our plan's ambition and outcomes were suitable taking into account the assessment of the options. It is important to note that a broad spectrum of options were considered – given the scope of our LTP it is not possible to distil the scope of the ambition and outcomes to be represented as a single appraisable option. Instead the spectrum we considered provided us an understanding of the types of impacts that could accrue depending on how extensive we chose to adopt a specific focus within our plan.

3.10. The strategic options for the built-up urban areas that we considered were as follows:

3.10.1. **Option U1 – Do minimum:** relying on committed investment, which would continue at a local and strategic level, and deliver limited additional investment. In practice the options would focus on the maintenance and enhancement of the local road network, with schemes likely to be of a limited scale. Such schemes are likely to include road safety schemes and basic network performance schemes, including and related to the programming of junction and signalling. In addition, the option would deliver local highway junction improvements and access schemes funded by third party development, including through planning applications.

3.10.2. **Option U2 – Network demand management through pricing mechanisms:** This option would seek to focus interventions on demand management measures. A key component of the options would be the introduction of direct charges on motorists for driving on public roads. These schemes would be designed to charge motorists for when and where they drive based on usage and could include area-based charging, where drivers pay a fee to enter a certain area with a certain vehicle, or road user charging, incorporating local road pricing schemes. The option would also seek to initiate other demand management measures such as parking restrictions.

3.10.3. **Option U3 – Optimise the use of existing infrastructure:** This option would have a strong focus on optimising the use of existing road infrastructure to enhance its performance. This would comprise a continuation and expansion of urban transport management systems, including network performance schemes, junction optimisation and other measures.

3.10.4. **Option U4 – Bus network and infrastructure enhancements:** This option would seek to initiate upgrades to the bus network, including through enhancements to bus stations and bus stops, reconfiguration of the urban road network to support bus priority, and where possible, support new and enhanced bus services. This would be supported in growth areas by network extension plans.

3.10.5. **Option U5 – Highway enhancements in urban areas**: This option would seek to facilitate significant new road infrastructure. Schemes would include new relief roads, junction capacity upgrades and new connections onto the Strategic Road Network.

3.11. The strategic options for the inter urban / rural swathe areas that we considered were as follows.

3.11.1. **Option R1 – Do minimum:** A 'do minimum' option would rely on committed investment, which would continue at a local and strategic level, and deliver limited additional investment. In practice the options would focus on the maintenance and enhancement of the existing inter urban road network, with schemes likely to be of a limited scale. Such schemes are likely to include road safety schemes and basic network performance schemes, including and related to the programming of junction and signalling. In addition, the option would deliver local highway junction improvements and access schemes funded by third party development, including through planning applications.

3.11.2. **Option R2 – Bus network and infrastructure enhancements:** This option would seek to initiate upgrades to the inter urban and rural bus network, including through enhancements to bus stops, reconfiguration of the road network to support bus priority, and where possible, support new and enhanced rural bus services.

3.11.3. **Option R3 – Optimise use of highways network:** This option would take a road safety approach, which would seek to deliver road safety schemes on the existing highways network, implement lower speed limits and enhance road safety for vulnerable road users such as pedestrians, cyclists and those travelling via other active travel modes.

3.11.4. **Option R4 – Rail service enhancements for rural communities:** The option would seek to deliver a range of schemes which deliver journey time and frequency improvements on the rail network, facilitate enhancements in access by rail to key regional and sub-regional centres and deliver enhancements to railway stations.

3.11.5. **Option R5 – Highway enhancements:** This option would seek to facilitate significant new road infrastructure. Schemes would include new bypasses, junction capacity upgrades and new connections onto the Strategic Road Network.

3.12. As detailed in the Environmental Report section 7, following this stage we made the following conclusions summarised as follows below. These conclusions lead to a re-framing of the LTP to "strike a balance" in recognition of the economic, social and environmental needs of the county relative to how people currently and are likely to travel in the future taking into account the realistic likelihood of the scale of funding we could expect to receive to change the transport system over that period.

3.12.1. Option U2 demonstrated the potential role of parking in demand management and accordingly KCC has established policy objective 5A which seeks to strengthen delivery of KCC network management duty to deliver the expeditious movement of traffic.

3.12.2. Option U3 concerning optimising the use of existing infrastructure has informed the development of policy objective 1A (concerning obtaining the funding necessary to deliver a sustained fall in the value of the backlog of maintenance work so that the existing highway network can better perform to service the needs of highways users) and also Policy objectives 4A (seeks the return of international rail services), and objective 3B (seeks to increase the resilience of the highway network for international traffic).

3.12.3. Concerning Option U4, we established policy objectives 8A and 8B, which seek to optimise use of existing public transport networks and services, to boost patronage and enable mode shift for those journeys that chose to.

3.12.4. Concerning Option U5 regarding highways enhancements in urban areas, the LTP5 has set out that there is an inevitable reliance on the road network and private and commercial vehicle use owing to the design, density, and scale of existing urban areas. The potential environmental impacts of these, proposal by proposal are not overlooked and have been considered in further detail as part of determining whether to retain those proposals in the adopted LTP.

3.12.5. Regarding Option R2, this informed our LTP5 policy objectives 8A and 8B concerning bus and rail transport, to ensure that future actions by the Council can aim to secure the funding to deliver a significant and comprehensive programme of improvements to the quality and reliability of bus services across the whole county.

3.12.6. Option R3 concerning optimising use of the highways network has been considered and informs KCC's LTP5 proposals and policy objectives 2A regarding our road safety strategy Vision Zero which can help to make the existing highway network safer for all types of users, including cyclists and pedestrians where safety is a major barrier to what is a very low environmental impact form of travel. Objectives 3A and 3B concern the inter-urban highways network and increasing its resilience and capability to accommodate the high international vehicle flows associated with the Eurotunnel and Port of Dover. These objectives recognise that the A2 / M2 and M20 corridors will remain the main highways network as it is not realistic for a new motorway route to be constructed across Kent to these international crossings given the environmental impacts of doing so.

3.12.7. We consider Option R4 and reflected this in the development of Outcome 8 and the proposals in the LTP5 including Local Rail Services. The Local Rail Services proposal aims to improve the frequency of rail services operating on inter-urban routes in the county, to avoid a minimum service of 1 train per hour which offers little flexibility or attraction towards using rail services in rural communities.

3.12.8. Option R5 was considered and informed LTP policy objectives 5A and 5B which recognise that in some instances the only viable approach due to the location, scale or nature of the challenge to the highway network, which can include from new development, may be the need to add capacity so that KCC can fulfil its network management duty and ensure that essential journeys including access to vital services and opportunities, such as employment, health and education can take place.

3.13. Our considerations are also made in the context of national policy which has, throughout the LTP development process, consistently made clear that the focus should be on providing journeys with choice, by delivering national strategic to improve the rail system, bus network, walking and cycling network, but also to deliver highways upgrades. The government has continued to fund all these types of transport improvements, which demonstrates the policy approach in transport we must also work within.

3.14. The next stage of the SEA entailed considering each proposal for site specific infrastructure across the county that we established as draft proposals and consulted on in 2024. They were assessed against the SEA Framework. They were updated following the 2024 consultation – see section 4 for further details. Not all proposals were taken forward into the final LTP – the SEA process assisted with the sifting of those proposals, although the exclusion of proposals was not limited to being on the basis of the results of the assessment contained in the Environmental Report (e.g. some proposals had become unnecessary due to changes in land use proposals set out in modified or updated Local Plans etc).

3.15. Those proposals where there was no change to or delivery of physical infrastructure proposed or service operations, such as Improve access to local rail stations, Development Management Proposals, Local Road Freight Management, Trunking proposals etc. were not subject to this stage of assessment – their impact having been considered within the overarching principles of the strategic options findings detailed above. In summary, we determined that these proposals were all developed on the basis of improving transport and its impacts, including the environmental impacts. We are satisfied these proposals would make a positive contribution to Kent's environment and the outcomes of the plan, as detailed in our Supporting Evidence Base report.

3.16. The SEA findings demonstrated that there were a range of uncertain effects at this stage owing to many proposals being in concept form and requiring further planning and development of their design to establish more certainty on their potential effects. The SEA details the potential effects where uncertainty is concluded, which has informed us where risks exists for each proposal.

3.17. The SEA also considered cumulative effects that can arise as a result of the in-combination and synergistic effects of a plan's policies and proposals. Comprising 'intra-plan' effects, these interactions have been discussed above in the evaluation of the in-combination and synergistic effects of the various policies of the LTP. Also considered were those that can result from the combined impacts of a plan with impacts of another plan, or the 'inter-plan' effects.

3.18. The cumulative effects assessment findings, in summary, were that:

3.18.1. Potential increases in traffic flows and congestion from the in-combination effects of development (local planning authority Local Plan effects) and transport capacity enhancements could occur, with potential impacts on air and noise quality, landscape and townscape character and the setting of the historic environment. However, the in-combination effects of proposals on enhancing public transport and pedestrian and cycle infrastructure may help limit potential negative effects and secure positive effects in this regard.

3.18.2. That there could be cumulative impacts on ecological networks from the in-combination effects of new development and associated infrastructure such as transport on habitats and biodiversity corridors. However, enhancements to green infrastructure provision facilitated through plan proposals and other projects in the area, as well as an increased focus on biodiversity net gain also have significant potential to support local, sub-regional and regional ecological networks.

3.18.3. Cumulative and synergistic impacts on greenhouse gas emissions from growth areas and the LTP proposals which support them. This has been further considered in the LTP itself, in line with addressing the government's emerging aim for LTPs to consider quantifiable carbon impacts of the LTPs. The finding shows that there is a high dependency on national policy and plans as these will exert the highest impact on transport regulations and investment that drive production of greenhouse gas emissions, including across sectors associated with aspects such as energy production as a fuel input to transport operations.

3.18.4. Potential cumulative impacts from a release of induced demand for transport from the in-combination effects of the LTP and nationally significant road and rail enhancements delivered by government and its national bodies.

3.18.5. Potential impacts on flood risk from the in-combination effects of new development, including relating to surface water and fluvial flooding.

3.18.6. Potential enhancements to sub-regional green infrastructure networks.

3.18.7. Potential improvements in accessibility resulting from the in-combination effects of enhancements to public transport and walking and cycling networks and public realm enhancements.

3.19. A summary of the recommendations is shown below concerning the proposals and their future planning and development towards delivery.

3.19.1. Biodiversity, flora and fauna:

- Potential impacts on biodiversity habitats should be considered during scheme development, avoidance and mitigation measures implemented, and opportunities for maximising net gain explored.
- Opportunities to enhance ecological networks through appropriate planting and green infrastructure enhancements should be sought, supporting a premise of environmental net gain and delivering multifunctional benefits.
- New and improved lighting and signage should be designed to minimise impacts on nocturnal species.
- Development of a programme of works to help ensure that SSSIs and other important designated sites affected by the transport network are brought into favourable condition.

3.19.2. Air quality

- Green infrastructure enhancements should be delivered alongside new infrastructure and designed to support air quality improvements, with a view to reducing exposures of key pollutants.
- Comprehensive monitoring of emissions from transport should be undertaken.

3.19.3. Population and human health

- Incorporate road safety schemes within scheme development for vulnerable road users.
- Encourage design which supports the needs of mobility-impaired and vulnerable groups.
- Opportunities to encourage inward investment and growth in areas of improved sustainable transport access should be sought.

3.19.4. Climatic factors

- Transport proposals should seek to maintain carbon sequestered in soils and habitats and seek to increase carbon capture through provision of semi-natural habitats including trees, wetlands and grasslands.
- Comprehensive monitoring of emissions from transport should be undertaken.
- Proposals associated with the LTP5 should seek to increase the resilience of infrastructure to the anticipated impacts of climate change.
- The use of permeable surfacing should be prioritised in scheme design.

3.19.5. Soil and water quality

- New infrastructure should be supported by permeable surfaces and appropriate drainage systems where necessary, to reduce surface water run-off and maintain or improve attenuation rates.
- Provision of sustainable drainage systems, including through green and blue infrastructure provision should be sought where possible alongside new transport infrastructure.

3.19.6. Cultural heritage

- Potential impacts on the historic environment should be appropriately considered at scheme design.
- The significance of both designated and undesignated heritage assets should be a key consideration in scheme development.
- New transport infrastructure should be designed to facilitate enhancements to the fabric and setting of the historic environment.
- Opportunities for enhancing access to and promoting understanding of the historic environment should be sought.
- Maintenance regimes should seek to facilitate enhancements to the fabric and setting of designated and undesignated features and areas of historic environment interest.
- Kent's archaeological resource should be a key consideration in the development of transport schemes.

3.19.7. Landscape, noise and tranquillity

- New infrastructure should be designed to facilitate enhancements to the quality of the public realm and landscape, townscape and village scape character.
- Transport infrastructure delivery should avoid the loss of existing trees and landscape features where possible.
- Green infrastructure enhancements should be sought alongside new and enhanced transport infrastructure provision.
- Maintenance regimes should seek to facilitate enhancements to local character.
- Low noise surfacing should be integrated in new transport provision and maintenance regimes.

3.19.8. Material assets

- Schemes associated with proposals should seek to limit waste arisings during construction.
- Schemes should seek to incorporate the use of reused and recycled materials.
- Scheme design should seek to extend project life and reduce future maintenance requirements through the use of longer-life materials.

4. How opinions expressed in response to consultation on the draft LTP and SEA have been taken into account.

4.1. Consultation on the SEA Scoping Report was undertaken at the beginning of 2022. The Scoping Report was subsequently updated in May 2022 to reflect comments. We received comments from Natural England and Historic England. We have detailed the actions we took in response to their feedback in Table 2.1 of the SEA. In summary the changes to the SEA consisted of:

4.1.1. Incorporating and reflecting the most up to date planning and environmental policy and guidance at the time such as the NPPG and the then planned Local Nature Recovery Strategies that had recently been introduced as a requirement by the Environment Act 2021.

4.1.2. To make clear that comments querying / requesting consideration of sites of special protection would be considered within a separate Habitats Regulation Assessment

4.1.3. To reflect recommended inclusion of aspects in the assessment criteria, which were used to inform the generation of the SEA Framework that was used to assess the strategic options and site-specific proposals.

4.2. Following the scoping stage, our LTP and SEA Environmental Report was subject to a statutory consultation in July to October 2024. There were no substantive comments received on the SEA itself however KCC received comments concerning how it had taken the SEA into account and this aspect is addressed by way of this Adoption Statement, further to the detail already reflected in section 7 of the SEA.

4.3. The LTP received comments concerning new proposals, and these were initially sifted, taking into account environmental considerations that are set out in the SEA Framework. As detailed in our You Said We Did report, one proposal we received concerning a proposed parkway rail station at the site of the existing Swale Station we sifted out on environmental grounds. This was owing to the location of the proposal sitting in an area surrounded by sites of special protection and therefore making them unsuitable for the proposal and given we considered there were other options to achieve similar outcomes covered by the proposals within the consulted LTP.

4.4. Those remaining options not sifted out were incorporated into the SEA and assessed using the Framework. Those options were M25 Junction 3 enhancements and A226 Galley Hill Road solution. The findings from those assessments provided an indication that there were no obvious or discernible

significant environmental effects at this stage of their development and therefore they have been incorporated into the LTP and will be subject to our aim to progress the SEA recommendations.

5. The reasons for our choosing the LTP as adopted, in the light of the other reasonable alternative options dealt with in our SEA

5.1. The SEA has helped inform our decision that the proposals we consulted on and have added further to the 2024 consultation should be retained in our plan owing to those potential positive and / or mitigable effects. Furthermore, these are balanced against the wider positive effects in transport terms, as detailed for each proposal in our Supporting Evidence Base.

5.2. As detailed in this adoption statement, and with reference to the findings of the SEA, we are confident that in adopting the LTP on the basis of a plan to progress these recommendations detailed in section 7.4 (pg. 73) of the Environmental Report. These will be acted upon, as necessary, for those proposals we secure funding to develop and deliver. In doing so, we will be able to mitigate adverse environmental impacts proposals could risk generating, and secure the positive environmental impacts they may offer, balanced against the wider impacts the LTP aims to deliver.

5.3. Our Plan is designed to strike a balance across the mix of transport, setting out how we would like to achieve improved journeys for all the different parts of the transport system across Kent. It is designed to strike a balance between the investment needed to improve the county economy, to make living and working better, whilst also preparing our transport networks to meet the environmental challenges facing the county.

5.4. What is clear from our LTP, and of relevance to implementing the recommendations of our SEA, is that delivery of the LTP will require sustained and sufficient funding from government, not just for construction but for the design and development of proposals. This will be important in ensuring we can sufficiently consider and mitigate environmental risks and seize opportunities, notwithstanding those actions we are obliged to take to fulfil legislative and regulatory requirements where a proposal is subject to those.

6. The measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan.

6.1. Monitoring for the plans and programmes will be a key means of ensuring that unforeseen adverse environmental and socio-economic effects are highlighted, and remedial action can be taken where adverse effects arise.

6.2. Our primary measure will be to implement the recommendations in section 7.4 of the Environmental Report and as summarised in section 3.19 of this adoption statement. Following adoption of the LTP, we will aim to monitor our progress in delivering the outcomes and their requisite proposals, using the objectives set out in the LTP.

6.3. In doing so, we will aim to monitor the impact of the delivery of our proposals and evaluate whether their outcomes, including in environmental impacts, are consistent with the likelihood established during their planning and development. We will aim to implement the recommendations to reduce the risks early on in the planning and development process of proposals, in order to reduce the likelihood of significant environmental effects and aim to monitor whether we are successful in that.