

Appendix C: Consultation Summary

1 Introduction

1.1 In September 2010 the County Council published its Draft Strategy Plan of the Local Transport Plan (LTP), which set out its proposals for future transport provision in the county. A number of appendices were also published as part of the consultation exercise and these are listed in Box 1.

Box 1. List of Appendices

- A. Cannock Chase District Integrated Transport Strategy
- B. The LTP Process
- C. Consultation Plan
- D. Policy Context
- E. Health Impact Assessment Toolkit
- F. Equality Impact Assessment Scoping Report
- G. Strategic Environmental Assessment Draft Environmental Report
- H. Habitats Regulations Assessment Draft Screening Report
- I. Connectivity and Congestion in Staffordshire
- J. Accessibility Levels in Staffordshire
- K. Staffordshire Network Management Plan
- L. Staffordshire Freight Strategy
- M. Staffordshire Cycling Strategy
- N. Staffordshire Walking Strategy
- O. Overview of Air Quality in Staffordshire
- P. Impacts on Health and Quality of Life in Staffordshire
- Q. Staffordshire Rights of Way Improvement Plan

Box 2. Consultation Questions

1. Do you consider any parts of the Strategy Plan to be factually incorrect?
2. Have any significant issues of strategic importance been omitted from the vision? If so, please advise.
3. Are there any "Challenges" of strategic importance that we have omitted or that you feel are under-represented? If so, please advise.
4. Do the "Scale of the Challenge" sections (in Chapters 1-7) accurately reflect your understanding or perception of transport in Staffordshire?
5. Have any issues of strategic importance which may help to address one or more of the "Challenges" been omitted? If so, please advise us of the issues you feel to be important and which strategy they relate to.
6. Are there clear linkages between the challenges, policies, outputs, indicators and targets as summarised in the tables at the end of each Strategy?

1.2 The consultation documents were published on the County Council's website (www.staffordshire.gov.uk/ltp), together with a consultation feedback form that contained six consultation questions (Box 2).

1.3 An email regarding LTP consultation - and consultation on the Local Economic Assessment - was sent to all County Councillors, all members of the public who had previously expressed a wish to be kept informed of LTP development, and a wide range of external stakeholders. The stakeholders included local planning authorities, neighbouring and other regional authorities, the emergency services, educational establishments, health agencies, environmental bodies, bus and train operators, organisations representing the needs of collective groups (such as the Confederation of Passenger Transport and Staffordshire Chamber of Commerce and Industry), MPs and local businesses.

The email contained a link to the LTP Portal (www.staffordshire.gov.uk/ltp), where the relevant documentation and details of how to respond were found.

1.4 The consultation ran for 12 weeks, from 30th September 2010 to 23rd December 2010. A handful of responses were received after the closing date and have been considered.

1.5 In total, 42 responses were received and a list of respondents is given in Box 3.

Box 3. Details of Respondents

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| <p>3 County Councillors</p> <p>1 MP</p> <p>7 Local Planning Authorities</p> <p>2 Neighbouring Authorities</p> <p>1 National Park Authority</p> <p>6 Members of the public</p> <p>22 Stakeholders:</p> <ul style="list-style-type: none"> • Fradswell and Milwich Parish Council • Barton-under-Needwood Parish Council • Council for the Protection of Rural England • Confederation of Passenger Transport • Job CentrePlus • Mid Staffordshire NHS Foundation Trust • District Partnership Co-ordinator • County 14-19 Transport and Access Co-ordinator • Stafford and District Access Group • Stafford Transport Action Group • Stafford and District Community Transport • Stonnall Campaign About Roads • Central Rivers Initiative | <ul style="list-style-type: none"> • Cycle Touring Club • Highways Agency • Lichfield Rail Promotion Group • North Staffordshire Chamber of Commerce and Industry • English Heritage • Network Rail • South Staffordshire PCT • Network Rail • East Midlands Trains |
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1.6 This report provides a summary of the responses received and describes how the County Council will take these into account when preparing the final Strategy Plan, which is due to be published in April 2011. A more detailed account of the individual replies to the consultation and the County Council's response to them is available upon request.

1.7 In addition to the 12 week consultation undertaken on the Draft Strategy Plan, significant consultation was carried out prior to this to inform the development of the LTP, including:

- Stack Up: The Building Blocks Campaign.
- Youth Action Kouncil's Speak Out Conference.
- LTP Portal.
- LTP Forum.
- LTP Members' meetings.
- LTP Newsletters.
- Snap the Web Photo Competition.
- Online Visitor Survey.
- Internal consultations.
- Specific consultations on supporting documentation, including:
 - Consultation on the Long-Term Transport Strategy.
 - Equality Impact Assessment Scoping Report.
 - Strategic Environmental Assessment Scoping Report.
 - Habitats Regulations Assessment Screening Report.
 - Staffordshire Freight Strategy.
 - Staffordshire Walking Strategy.
 - Staffordshire Cycling Strategy.

Further information about these additional consultations, including how we respond to them, can be found on the LTP Portal (www.staffordshire.gov.uk/ltp).

2. Vision

2.1 The vision was commented upon by two planning authorities, five other stakeholders and one member of the public. Generally the vision is supported but some respondents requested that additions/ amendments be made. These, together with the County Council’s response, are summarised in Table 1.

Table 1: Summary of Comments Received about the LTP Vision

Comment	County Council Response
The importance of the economy is recognised but this should not necessarily be prioritised over the aims of achieving sustainable development and minimising adverse effects on the environment.	County Councillors have set their priorities as: <ul style="list-style-type: none"> • Supporting growth and regeneration. • Maintaining the highway network. • Making transport easier to use and places easier to get to.
The vision needs to emphasise tackling climate change through reducing carbon emissions from transport.	Whilst tackling climate change is an important element of the LTP (see Chapter 5 ‘Reducing Road Transport Emissions and Their Effects on the Highway Network’), County Councillors have set their priorities as: <ul style="list-style-type: none"> • Supporting growth and regeneration. • Maintaining the highway network. • Making transport easier to use and places easier to get to.
The vision needs to include equal opportunities to access regardless of where you live and an integrated transport system.	Equality of opportunity and an integrated transport system is implicit in the vision. They are important elements of the LTP (see Chapter 3 ‘Making Transport Easier to Use and Places Easier to Get to’).
The vision is fine but proposals to satisfy it are deficient in ignoring how rail can help.	We agree that the LTP should give greater attention to the role of rail. Rail issues now feature more in Chapter 3 ‘Making Transport Easier to Use and Places Easier to Get to’.
There are no use of the words ‘health and well-being’ within the vision.	Whilst health and well-being is an important element of the LTP (see Chapter 6 ‘Improving Health and Quality of Life’), County Councillors have set their priorities as: <ul style="list-style-type: none"> • Supporting growth and regeneration. • Maintaining the highway network. • Making transport easier to use and places easier to get to.
Has an assessment been made of whether the visions and policies of the daughter documents accord with the vision of the Strategy Plan?	Whilst there has been no formal assessment, we did ensure that we were satisfied that the daughter documents aligned with the Strategy Plan before consultation.

2.2 Whilst the suggested amendments are important elements of the LTP, our priority remains growth and regeneration, highway maintenance and accessibility, which is reflected within the current vision.

3. Objectives and Challenges

3.1 The objectives and challenges were commented upon by one MP, two planning authorities, four other stakeholders and three members of the public. Generally the objectives and challenges were supported but some respondents requested that additions/amendments be made. These, together with the County Council's response, are summarised in Table 2.

Table 2: Summary of Comments Received about the LTP Objectives and Challenges

Comment	County Council Response
The linkages between the objectives and challenges are clear, although relative priorities are not.	The priorities of the LTP will be made clear in the final Strategy Plan.
The original objective "To ensure the transport network reduces its impact on climate change" would have been more positive than its replacement.	This comment has been noted. However, given the level of consultation and information that has already been undertaken on the subject, we propose to retain the current wording.
Omitted public transport objectives, specifically in terms of potential infrastructure enhancement schemes to support bus and rail provision, and facilitate patronage growth.	There is some reference to this within Policy 3.4. However, it is intended that this level of detail will be contained within the District Transport Strategies.
<p>The LTP needs to address:</p> <ol style="list-style-type: none"> 1. Reducing air pollution. 2. Health - Reducing noise pollution. 3. Reducing light pollution. 4. Reducing road traffic deaths/injury 5. Increasing physical activity through promotion of active travel. 6. Increase access to services. 7. Supporting community cohesion. 	<ol style="list-style-type: none"> 1. This is dealt with in Chapter 5 'Reducing Road Transport Emissions and Their Effects on the Highway Network'. 2. This is dealt with in Chapter 6 'Improving Health and Quality of Life'. 3. This is dealt with in Chapter 7 'Respecting the Environment'. 4. This is dealt with in Chapter 4 'Improving Safety and Security'. 5. This is dealt with in Chapter 6 'Improving Health and Quality of Life', and Appendices M, N and Q. 6. This is dealt with in Chapter 3 'Making Transport Easier to Use and Places Easier to Get to'. 7. This is dealt with in Chapter 6 'Improving Health and Quality of Life'.
A further overarching challenge would be the minimisation of resource use and working more efficiently and effectively.	We believe that this is adequately covered in Chapter 2 'Maintaining the Highway Network' and Chapter 7 'Respecting the Environment'.
Add maximise opportunities for transport to positively contribute towards people's quality of life.	Health and well-being are important elements of the LTP (see Chapter 6 'Improving Health and Quality of Life'), Therefore, there would be little value in adding it in as an additional challenge.

Comment	County Council Response
<p>The following are suggested additional transport challenges:</p> <ul style="list-style-type: none"> • A growing number of older people. • Providing transport and services for disadvantaged groups, such as disabled people and people needing access to medical services. • Providing a network of transport services including public transport, subsidised services and alternative transport arrangements. • Supporting and enabling non-public transport initiatives such as community transport and volunteer car schemes. • Providing information on all transport options. • Providing fully accessible public transport. • Providing highway infrastructure to assist vulnerable users. 	<p>These are important issues for the County Council and have already been covered by Policies 3.3 and 3.4. Therefore, there would be little value in adding them as additional challenges.</p>
<p>Questions the challenge “Enhancing the highway through maintenance” – why limited to enhancement when there is biodiversity loss?</p>	<p>The challenges have been set at a level that precludes reference to this level of detail. The challenge “minimising the effect of transport on the environment” deals more with the negative impacts of transport whereas “enhancing the highway through maintenance” looks at betterment opportunities.</p>
<p>Beef up words in final objective to “Protecting/Improving/Enhancing the Environment.</p>	<p>We understand that there may be a case for this but it has been agreed with County Councillors that the word “Respecting” simply and adequately covers what we would like to achieve.</p>
<p>The overriding challenge is the ecological challenge and this should come first before others on the list, including economic and social challenges.</p>	<p>County Councillors have set their priorities as:</p> <ul style="list-style-type: none"> • Supporting growth and regeneration. • Maintaining the highway network. • Making transport easier to use and places easier to get to. <p>Therefore, the challenges within these priorities are also considered a priority.</p>
<p>Would question to what extent the existing vision, objectives, challenges and options have been generated with public input.</p>	<p>Public consultation about the vision, objectives, challenges and options was carried out in autumn 2009. Following this, amendments have been made and these have been made available to the public through the LTP Portal and Newsletter.</p>

3.2 As the suggested additions are already implicit within the LTP, or will be made clearer within it, no further amendments will be made to the objectives or challenges.

4. Supporting Growth and Regeneration

4.1 This strategy was commented upon by one MP, three planning authorities, eight other stakeholders, and one member of the public. These, together with the County Council's response, is summarised in Table 3.

Table 3: Summary of Comments Received about 'Supporting Growth and Regeneration'

Comment	County Council Response
<p>Policy 1.1</p> <p>Does not seem to deal with the impact of growth, particularly substantial housing development. The LTP policies for dealing with the transport implications of growth must be more clearly articulated.</p> <p>The transport network rarely contributes to attractiveness and vibrancy of towns and villages. Greater sensitivity over design is needed.</p>	<p>Policies 1.4, 1.5 and 1.6 deal with the impact of growth. However, the wording will be amended to make it clearer.</p> <p>We believe that the how the transport network is managed and maintained can contribute to the attractiveness and vibrancy of towns and villages. How we plan to do this and reduce the negative impacts of our activities on the network is adequately described in Chapter 7 'Respecting the Environment', particularly Policies 7.6 and 7.7, and in Boxes 1.6 and 1.10.</p>
<p>Policy 1.2</p> <p>Need to include an indicator for public satisfaction with local transport to help identify any gaps due to demographics, rurality and social need.</p> <p>The transport network rarely contributes to attractiveness and vibrancy of towns and villages. Greater sensitivity over design issues needed.</p>	<p>Chapter 3 'Making Transport Easier to Use and Places Easier to Get to' contains indicators on public satisfaction, including public satisfaction with:</p> <ul style="list-style-type: none"> • Local bus services • Local public transport information • Ease of access to key services (all, people with disabilities, no car households) • Local taxi services • Community transport <p>We believe that the how the transport network is managed and maintained can contribute to the attractiveness and vibrancy of towns and villages. How we plan to do this and reduce the negative impacts of our activities on the network is adequately described in Chapter 7 'Respecting the Environment', particularly Policies 7.6 and 7.7, and in Boxes 1.6 and 1.10.</p>

Comment	County Council Response
<p>Policy 1.3</p> <p>Travel plans need to be more robust and meaningful.</p> <p>The policy should mention public transport, walking and cycling explicitly, with corresponding outputs, indicators and targets.</p>	<p>We agree that travel plans need to be robust and meaningful. See Policy 3.1 about sustainable land-use policies, which states that travel plans should include modal shift targets, annual performance monitoring, remedies and enforcement obligations.</p> <p>Policy 1.2 and Table 1.1 will be amended to reflect public transport, walking and cycling. There are no plans to amend the indicators and targets though. Indicators and targets for public transport, walking and cycling are contained within Chapter 3 'Making Transport Easier to Use and Places Easier to Get to'.</p>
<p>Policy 1.4</p> <p>Should make it clear how it will not disadvantage smarter travel modes.</p> <p>Reduce congestion using a number of small "quick win" interventions and improvements identified by road users.</p>	<p>The LTP attempts to encourage the use of smarter travel modes (see Chapter 6 'Improving Health and Quality of Life'). However, in the current financial climate it may be difficult to promote them as we would like.</p> <p>We agree and believe that this has been adequately covered in Policies 1.4 and 1.5.</p>
<p>Policy 1.5</p> <p>You could encourage travel to events by train, with shuttle bus services from convenient stations.</p>	<p>We agree and Policy 1.5 will be amended to reflect the use of public transport in minimising the impact of events on the highway network.</p>
<p>Policy 1.6</p> <p>The policy should make clear that priority should be given to smarter modes rather than simply increasing speeds and thus making car travel more attractive.</p> <p>You could encourage transfer of passengers and freight to rail to reduce road congestion.</p> <p>The policy refers to road building being first justified against "...Staffordshire's development/regeneration agenda". This needs explanation.</p>	<p>Policy 1.6 makes it clear that the needs of safety, pedestrians and cyclists are also important.</p> <p>We agree that the transfer of passengers and freight to rail (and other more sustainable modes) is beneficial in order to reduce road congestion. The Staffordshire Freight Strategy (Appendix L) outlines a number of actions to encourage rail freight while recognising that the influence of the County Council is limited.</p> <p>We agree and the words will be simplified.</p>

Comment	County Council Response
<p>Policy 1.8</p> <p>Encourage greater use of rail, specifically by identifying and safeguarding possible sites for rail terminals.</p> <p>Reference needs to be made to the environmental benefits of transferring freight from road to rail and the potential for new road/rail interchange depots. The Panel Report of the former RSS identified the Mid Cannock site as a potential Regional Logistics site, following representations made by Network Rail. It is considered that despite the revocation of the RSS, this scheme should be progressed as part of LTP3.</p>	<p>It is agreed that this is an important issue. Policy 1.8 refers to the implementation of the Staffordshire Freight Strategy (Appendix L) which considers rail freight. Priorities 19 and 20 of the Freight Strategy deal with this issue and it is therefore not proposed to amend Policy 1.8.</p> <p>We agree that there are environmental benefits of rail freight transport and the Staffordshire Freight Strategy (Appendix L) recognises these. Reference in the Freight Strategy will be strengthened to the potential of rail transfer 'hubs' and modal shift of existing logistics activity. The Pentolver Depot Site at Churchbridge will be referred to as an example.</p>
<p>Indicators and targets</p> <p>The appropriateness of the NEET indicator as a measure of regeneration is questioned.</p>	<p>We understand this concern. NEETs will be kept as a proxy indicator but no target will be set.</p>
<p>The availability of car parking at rail stations is not constrained by parking restraint policies. Adequate car parking at stations is an important enabler of modal shift from private car to public transport and should be supported.</p>	<p>We agree that adequate parking at stations is an important enabler of modal shift. The County Council will work with local planning authorities, train operating companies and other stakeholders to try and ensure adequate parking (including cycle and motorcycle parking) at rail stations. Also see Policy 3.4.</p>
<p>Flexible public transport has a major role to play and I recommend that such schemes are considered where fixed bus services are uneconomic.</p>	<p>Policy 3.2 states that the County Council will maintain socially important bus routes and minimum rural bus service levels (where budgets allow). Policy 1.1 states that the County Council will continue to provide tailored transport services and travel incentives to those for whom access is a barrier to jobs and education.</p>
<p>I would question the Council's ability to effectively minimise the impact of large events (e.g. V Festival) but agree local people should be informed in order that travel behaviour can be adjusted.</p>	<p>Over the last few years the County Council has continually sought to minimise the effect of large events and in the case of the V Festival, Alton Towers etc., with some success. Whilst the County Council is unable to physically control the traffic during the event, during the planning stages and evaluation process, it can and does insist that change, amendment and improvements are implemented to lessen the traffic impact at specific locations. An effective and comprehensive communication plan is just one of the tools employed to deliver this vision.</p>
<p>The LTP needs to consider how we deal with global warming, fuel shortages and price hikes.</p>	<p>The issue of fuel shortages and price hikes will be discussed in the Introduction.</p>

5. Maintaining the Highway Network

5.1 This strategy was commented upon by one MP, three local planning authorities, three other stakeholders and one member of the public. These, together with the County Council's response, is summarised in Table 4.

Table 4: Summary of Comments Received about 'Maintaining the Highway Network'

Comment	County Council Response
<p>Policy 2.2</p> <p>Should include consideration of aesthetics and local character with particular reference to conservation areas.</p> <p>Problems arise with respect to lighting schemes in conservation areas.</p>	<p>Conservation areas are not treated the same as non-conservation areas during the delivery of the PFI service. Conservation officers are consulted and when necessary parish councils are given representations to ascertain what they would like to achieve within the delivery constraints of the PFI. When undertaking asset renewal work within conservation areas, the PFI contractor is obliged to give due consideration to their status. The PFI service provider is not obliged to provide an enhanced design unless additional funding can be secured.</p>
<p>Indicators and targets</p> <p>The appropriateness of the compensation claims indicator as an output for the maintenance objective is questioned.</p> <p>The target for unclassified roads is queried.</p>	<p>We understand the concern but this will be kept as a proxy indicator but no target will be set.</p> <p>The LTP will no longer include a target for unclassified roads.</p>
<p>It is considered that limited LTP resources should be concentrated on highway maintenance.</p>	<p>Highway maintenance is a priority for the County Council. We have received a 7% increase in capital funding to deliver maintenance activities in addition to identifying other funds through efficiency saving and using alternative financing models (such as those described in Boxes 2.1 and 2.2 of the Strategy Plan). To ensure we spend wisely, investment will be guided by the Transport Asset Management Plan (Appendix R).</p>
<p>SCC should give realistic and accurate information about the length and scale of maintenance works. I urge SCC to ensure there is proper co-ordination with utility companies.</p>	<p>One of the primary objectives for the County Council is to oversee a well managed and controlled network and this is demonstrated in Policies 1.4, 1.5 and 1.6, and Boxes 1.4, 1.9 and 1.10.</p> <p>For our own works, we undertake comprehensive and understandable communication with stakeholders and interested parties. Where third parties, such as utility companies, need to undertake work on the highway, a series of measures are undertaken culminating in formal 'Network Co-ordination' meetings that are held regularly and give ample opportunity for extended notice periods to be provided.</p>

Comment	County Council Response
<p>The LTP does not give enough consideration to how urban design can be used as a method of slowing down traffic and improving the environment for pedestrians and cyclists.</p>	<p>We agree and some reference to urban design will be made in Chapter 4 'Improving Safety and Security'. The Staffordshire Walking Strategy (Appendix N) and the Staffordshire Cycling Strategy (Appendix M) also deal with urban design issues.</p>
<p>Maintaining the current condition will be a challenge in the context of reduced resources and severe weather conditions. The impact of winter weather in rural areas could be reduced if locals could be encouraged to assist in snow clearance/gritting.</p>	<p>The Implementation Plan will describe how more activities can, and should, be undertaken by local communities, complementing the Government's 'Big Society' agenda.</p>
<p>The LTP should state how it intends to deliver the landscaping element of the highway and what opportunities are available for outside bodies to contribute to this.</p>	<p>Having regard to the 'localism agenda', the County Council will be receptive to such proposals. However, each proposal would also need to be considered individually, based on its own merits.</p> <p>Sustainability is a significant issue and, given the economic situation we face, we would be most unlikely to support any such improvement that created an ongoing added liability for the County Council. Each individual proposal would therefore either need to reduce the long-term highway liabilities or at least have an arrangement where such responsibilities would fall to a separate supporting organisation.</p>
<p>Is increasing the amount of street lighting a success? Have you considered reducing the number of lights?</p>	<p>Policy 2.2 adequately sets out how we plan to manage our street lighting stock in a sustainable manner and Policy 7.3 adequately sets out how we plan to reduce the negative impact of artificial lights.</p>

6. Making Transport Easier to Use and Places Easier to Get to

6.1 This Strategy was commented upon by one MP, six local planning authorities, 14 other stakeholders and two members of the public. These, together with the County Council's response, is summarised in Table 5.

Table 5: Summary of Comments Received about 'Making Transport Easier to Use and Places Easier to Get to'

Comment	County Council Response
<p>Policy 3.1</p> <p>We would welcome a stronger focus on securing improvements to off-site walking, cycling and public transport corridors.</p> <p>The need to at least maintain existing levels of bus services in rural areas is of particular importance.</p> <p>We suggest that the third main bullet point on planning obligations also refers to investing in the public realm.</p>	<p>There is a stronger focus on this issue within the Staffordshire Walking Strategy (Appendix N) and the Staffordshire Cycling Strategy (Appendix M).</p> <p>Whilst we understand this concern, we are unable to directly influence commercial bus services and fares. We will work with bus operators to improve Staffordshire's commercial bus network. The County Council is able to subsidise services that are not commercially viable but will need to concentrate resources where they provide good value for money. During 2011/12 the County Council will prepare a Passenger and Accessibility Management Plan (PAMP). It will describe the authority's short to medium term plans for integrated public transport provision and will include criteria to determine investment in supported bus services in light of the future reductions in the revenue budget.</p> <p>We agree and the Policy will be amended accordingly.</p>
<p>Policy 3.2</p> <p>Some bus services are getting worse, e.g. (1) many elderly and more vulnerable constituents have recently lost a direct bus service to Stafford Hospital (2) School children from a rural part of the constituency are now forced to stand every day as their service is full by the time it reaches their stop.</p> <p>Table 3.2: the output "more inclusive and accessible urban environments" should encompass rural areas.</p> <p>We would welcome a similar commitment to continue buses providing sustainable access for leisure journeys to Peak National Park.</p>	<p>Whilst we are unable to directly influence commercial bus services and fares, we work with bus operators in the area to improve Staffordshire's commercial bus network. Where budgets allow and it demonstrates good value for money, the County Council will subsidise services.</p> <p>Ideally this would be the case. However, to maintain levels of service in rural areas will provide a significant challenge in the current financial climate.</p> <p>We already subsidise a number of services, including Moorlands Connect, which takes people from Leek, Buxton and Ashbourne into the Staffordshire parts of the Peak District area. Access to leisure facilities by public transport may be included as part of the forthcoming Passenger and Accessibility Management Plan (PAMP).</p>

Comment	County Council Response
<p>Policy 3.3</p> <p>I would be interested to know how the Council plans to encourage service providers to take their services into communities that are not necessarily commercially viable. At the moment the bus service provider is removing services from some areas where there is a large concentration of residents with physical impairments on the basis of cost.</p> <p>The policy needs to include reference to minimum walking and gradient standards for access to bus stops for the elderly, over 75s and mobility impaired.</p> <p>Add into the policy that this will be achieved by working in partnership with community transport service providers to support and improve the county's community transport services.</p>	<p>The issue of supporting non commercial services and helping people with mobility impairments is adequately covered in Policies 3.2 and 3.3.</p> <p>The Staffordshire Residential Design Guide states that the County Council will follow the advice contained within Manual for Streets.</p> <p>The LTP states that Policy 3.3 will be achieved by:</p> <ul style="list-style-type: none"> • Continuing to provide high quality advice, information and guidance to the county's voluntary sector transport schemes. • Stimulating innovation and encouraging the adoption of best practice within the county's voluntary sector transport schemes. <p>We believe these bullet points imply partnership working with community transport service providers.</p>
<p>Policy 3.4</p> <p>Public transport needs to meet the needs of people in rural locations. Rural areas are under represented and policy 3.4 does not go far enough. Rural commuters need to have services that help them use sustainable modes of transport. The current bus service in Milwich only allows a shopper half an hour.</p> <p>Add in to the policy that this will be achieved by:</p> <ul style="list-style-type: none"> • Working in partnership with community transport operators in Staffordshire to improve local accessibility and to reduce social exclusion faced by rural residents. • Thinking long term and planning ahead – e.g. implications of an ageing population. • Improving customer satisfaction with transport services. 	<p>Services to rural locations are currently dealt with in Policy 3.2. However, during 2011/12 the County Council will prepare a Passenger and Accessibility Management Plan (PAMP). It will describe the authority's short to medium term plans for integrated public transport provision and will include criteria to determine investment in supported bus services in light of the future reductions in the revenue budget.</p> <p>With respect to bus services to and from Milwich, the County Council subsidises a twice weekly service to Uttoxeter, allowing approximately 2.5 hours shopping time and a daily service to Stone, also allowing shoppers about 2.5 hours. Unfortunately we are not in a position to subsidise further services.</p> <p>Policy 3.3 will be achieved by:</p> <ul style="list-style-type: none"> • Continuing to provide high quality advice, information and guidance to the county's voluntary sector transport schemes. • Stimulating innovation and encouraging the adoption of best practice within the county's voluntary sector transport schemes. <p>We believe these bullet points imply partnership working with community transport service providers, thinking long-term, and improving customer satisfaction.</p>

Comment	County Council Response
<p>Indicators and targets</p> <p>The appropriateness of bus patronage levels as an indicator is questioned as it is not indicative of a modal shift away from cars due to future population/household growth.</p> <p>“Accessibility to Key services” – how will this be measured?</p> <p>Add in the following targets:</p> <ul style="list-style-type: none"> • More people travelling by community transport • Improved customer satisfaction with community transport services • Improved customer satisfaction with public transport services 	<p>It is recognised that in the long term, Staffordshire will see an increase in its population. However, the County Council is anticipating that with the introduction of the concessionary travel scheme for the elderly and disabled, and the Young Person’s Travel Card (in June 2011), there is potential to increase bus patronage in the short term - reversing the national trend of declining bus patronage. It is anticipated that a proportion of these extra bus trips will be due to modal shift.</p> <p>The monitoring methodology for recording accessibility to town centres will be stated within the Implementation Plan.</p> <p>Monitoring the number of people who use community transport would be difficult and costly, and given limited resources this is not a priority. We have also refrained from setting targets that derive from the National Highways and Transport Public Satisfaction Survey as the source/ methodology is, to some extent, out of our control.</p>
<p>There is concern about the lack of focus on rail.</p>	<p>We agree that the LTP should give greater attention to the role of rail. Rail issues will feature more in Chapter 3 ‘Making Transport Easier to Use and Places Easier to Get to’.</p>
<p>A positive stance should be taken to help secure short and medium term investment in upgrading the local rail network.</p>	<p>We will continue to work with the Community Rail Partnership to secure benefits to travellers. At the current time, we are working with East Midlands Trains to investigate extended car parking facilities at Kidsgrove Station. Station improvements at Lichfield Trent Valley are also being examined. This will be mentioned in the LTP.</p>
<p>Newcastle Borough Council are concerned about the apparent intention to continue to rely on securing planning obligations to bring about travel plans and subsidised bus services. The introduction of the CIL regulations will lead to the eventual phasing out of Section 106 contributions towards infrastructure by April 2014.</p>	<p>The term ‘planning obligations’ is used in a generic way to include both past, current and future arrangements. In this context, CIL is viewed as an ‘obligation’. The Implementation Plan will distinguish between different ‘obligations’ and recognises the anticipated overarching nature of CIL as a potential source of funding for transportation issues. However, the latest ‘Overview’ document with respect to CIL (November 2010) continues to see a potential role for development specific planning obligations alongside CIL subject to the application of the tests set out in Circular 5/05, provided there is no overlap and the limitation of such obligations for pooled contributions to no more than five developments.</p>

Comment	County Council Response
Give greater priority to the Chase Line linespeed upgrade and this will now need to be promoted by Cannock Chase Council and Staffordshire County Council and Centro to prepare a bid for the new funding sources.	A rail industry scheme would be encouraged by the County Council but we are unlikely to be involved in a funding bid.
Reference is made to two thirds of Cannock Chase residents living within 350m of a bus stop which has a better than half hourly week day service. In fact the bus service in the district has experienced a decline. Many parts of the district involve a steep climb to get to the bus stop which is too much for the elderly and mobility impaired. The LTP needs to contain standards that are more sympathetic to the needs of the elderly and mobility impaired.	The Staffordshire Residential Design Guide states that the County Council will follow the advice contained within Manual for Streets. The request to include standards that are more sympathetic to the elderly and mobility impaired is deemed to be too detailed for the LTP. Efforts to improve the situation for vulnerable residents are adequately covered in Chapter 3 'Making Transport Easier to Use and Places Easier to Get to', the Health Impact Assessment (Appendix E), and the Equality Impact Assessment (Appendix F).
Chapter 3 should highlight areas of deprivation and map accessibility to services and other facilities.	This is contained within Appendix J Accessibility Levels in Staffordshire.
The need to improve accessibility, particularly for vulnerable people who do not live in close proximity to the public transport network, has not featured strongly.	Chapter 3 'Making Transport Easier to Use and Places Easier to Get to' adequately sets out how we plan to improve accessibility levels across the county. In particular, Policy 3.3 deals specifically with the needs of vulnerable residents. Further detail will be contained within the Implementation Plan and the District Transport Strategies. During 2011/12 the County Council will prepare a Passenger and Accessibility Management Plan (PAMP). It will describe the authority's short to medium term plans for integrated public transport provision and will include criteria to determine investment in supported bus services in light of the future reductions in the revenue budget.
It is requested that working in partnership with district councils in order to improve accessibility for vulnerable people should be integrated into the draft strategy.	Chapter 3 'Making Transport Easier to Use and Places Easier to Get to', makes a number of references to working with stakeholders, including local planning authority, to improve accessibility for vulnerable people. Also see the Health Impact Assessment (Appendix E), and the Equality Impact Assessment (Appendix F).
The LTP needs to assist wider access to the countryside for urban dwellers, contributing to the tourism economy.	Tourism plays an important role in Staffordshire's economy as reflected in Policy 1.2, which includes facilitating sustainable access to tourist attractions.
Access to the natural environment (not exclusively rural areas) has a positive impact on health and well-being. Benefits can include mental health, reduced crime as well as exercise.	We agree that access to the natural environment has a positive impact on health and well-being. However, we believe that this has been adequately covered in the LTP Strategy Plan and the Health Impact Assessment (Appendix E), the Staffordshire Walking Strategy (Appendix N) and the Staffordshire Cycling Strategy (Appendix M).
Section 3.1 should include affordability.	We agree and Section 3.1 will be amended accordingly. The Health Impact Assessment (Appendix E) and the Equality Impact Assessment (Appendix F) also make reference to the transport needs of people on low incomes.
It is felt that Staffordshire could do more to boost both bus and coach travel for customers. Would like to see bus priority measures that could be used by coaches, better infrastructure for bus passengers and better signage throughout the county.	Bus priority measures are important to the County Council and this issue is covered in Policy 3.2. More focus will also be given to the role of long-distance coach services and coaches providing trips to holiday destinations and visitor attractions in the county.
There is very little information within the LTP dealing with the coach – there appears to be little understanding about the role of the coach in the context of the local economy.	We agree and more information will be given about the role of long-distance coach services and coaches providing trips to holiday destinations and visitor attractions in the county.

Comment	County Council Response
<p>We would like to see a particular focus upon those who do not have access to a car because they are young or unable to afford it.</p>	<p>Table 3.1 outlines the groups most likely to experience difficulty accessing jobs and services and the types of destinations that they have difficulty accessing. This includes young people and people on low income. Also see Box 1.8 about the Wheels to Work initiative and the Equality Impact Assessment (Appendix F).</p>
<p>The LTP should make it clearer how it will give priority to smarter travel modes – it would be helpful if there was a separate strategy document for public transport which explained how bus passenger growth will be achieved.</p>	<p>Annexed to the LTP are the Staffordshire Walking Strategy (Appendix N) and the Staffordshire Cycling Strategy (Appendix M).</p> <p>LTP guidance states that we are no longer required to prepare a separate Bus Strategy as part of the LTP. Therefore, this issue is primarily contained within Chapter 3 'Making Transport Easier to Use and Places Easier to Get to'. However, in 2011/12 the County Council will prepare a Passenger and Accessibility Management Plan (PAMP). It will describe the authority's short to medium term plans for integrated public transport provision and will include criteria to determine investment in supported bus services in light of the future reductions in the revenue budget.</p>
<p>Effective public transport links from residential areas to employment sites is needed.</p>	<p>This issue is the subject of the Strategy Plan's first challenge, 'Provide opportunities for residents to access jobs, training and education' and is dealt with in some detail in Chapter 3 'Making Transport Easier to Use and Places Easier to Get to'.</p>
<p>Improve the image, speed and reliability of journeys by public transport and reduce the age of buses which will help with emissions.</p>	<p>This issue is adequately covered in Policy 3.2 about improving bus services and Policy 5.2 about promoting the use of low-emitting vehicles and vehicle efficiency.</p> <p>In addition, in 2011/12 the County Council will prepare a Passenger and Accessibility Management Plan (PAMP). It will describe the authority's short to medium term plans for integrated public transport provision and will include criteria to determine investment in supported bus services in light of the future reductions in the revenue budget.</p>
<p>Use incentives rather than deterrents to encourage modal shift. Ensure that a quality, reliable alternative is in place before restricting car usage.</p>	<p>We agree that incentives are needed to encourage modal shift and these are covered within the policies of Chapter 3 'Making Transport Easier to Use and Places Easier to Get to', as well as Policies 5.1 and 5.2. However, it is sometimes useful to incorporate some form of demand management measure to persuade some people to use alternative modes.</p>
<p>Practice based commissioners are currently limited in terms of how they commission services from primary and secondary care due to limitations of the transport system. Inter-village access is needed in order to improve accessibility to primary care services. Also, if transport provision was improved, this would mean that services currently provided by the secondary care could be commissioned locally in primary care settings.</p>	<p>The County Council are willing to work with healthcare providers to discuss transport provision and the way ahead.</p> <p>The LTP will state that one of the measures to help deliver Policy 3.3 is encouraging service providers to take their services into communities such as mobile libraries, the Jobs Bus and GP branch surgeries.</p>
<p>The LTP needs to address bureaucracy around concessionary travel and how the funding is claimed back as this can be a disincentive to creative solutions.</p>	<p>From April 2011 the County Council will take over the administration of the concessionary travel scheme for the elderly and disabled. This scheme is a significant enhancement to the statutory scheme, which previously operated in the county and was administered by each local planning authority.</p>

Comment	County Council Response
The County Council should undertake a review of signage to all rail stations in the county in order to ensure that access to/from rail stations is well signed for both drivers and pedestrians.	This will be investigated as part of the District Transport Strategies.
There needs to be more emphasis on supporting people with disabilities and how they access public transport in rural areas. Many of these people rely on cars due to lack of services.	Chapter 3 'Making Transport Easier to Use and Places Easier to Get to', supported by the Equality Impact Assessment (Appendix F), adequately describes how we, with our partners, plan to help vulnerable residents. The LTP will also acknowledge that certain people will always be reliant on cars.
Who amongst the local community transport operators was consulted on issues relative to community transport? Were specific operators considered for direct involvement as a means of reaching hard to reach and disability groups?	In spring/summer 2010, we conducted a survey of all community transport operators (20) in receipt of a County Council Support Grant. This included community minibus and voluntary car schemes. The survey results informed the development of the LTP. The community transport operators that had an opportunity to input into the LTP development process because they received copy of the LTP newsletter included: <ul style="list-style-type: none"> • East Staffordshire Mobility Link • Stafford and District Community Link • Staffordshire Moorlands CVS • Tamworth CVS • Lichfield and District CVS • Newcastle-under-Lyme CVS
The key facts give an unfair impression – public satisfaction with community transport schemes is low – just 53% of residents are satisfied, placing Staffordshire last when compared to its ten nearest neighbours. On a national scale Staffordshire is ranked 23rd out of 23 Shire County authorities.	We understand the concern and have removed the statement from the key facts. The text in the main body of the chapter will be amended to say that whilst public satisfaction with voluntary sector transport schemes is low, this is probably because relatively few people know about and/or use them.
Why is there no mention of schemes not run by volunteers? The LTP gives the impression that these groups are supported by the County Council when in fact many groups run their own transport and incur the full cost.	We acknowledge that this may cause confusion and will amend the text to provide greater clarity.
It would be fairer to mention the Grant Support given by the County Council as well as advice, information and guidance.	It was decided not to mention the Grant Support because we were anticipating significant funding reductions across both our capital and revenue budgets and we were unsure how this would affect services at a local level. Since then, the County Council has been allocated £243,000 to support community transport initiatives. It is part of a £10m fund that is to be distributed to rural local transport authorities to kick-start the development of community transport services in their area.
It is very difficult to stimulate innovation and adopt best practice on a shoe-string budget.	All community transport schemes should be encouraged to adopt best practice. Not all improvements will incur a cost and where it does, it may lead to efficiency savings in the long term.
Concessionary travel scheme – will this be extended to all community transport operators? There is no mention of travel tokens, currently issued to those most in need.	As part of the measures to support Policy 3.3, the County Council will review the use of concessionary travel passes on 'other' transport services, including community transport under discretionary enhancements.

Comment	County Council Response
How will improved community transport be achieved?	<p>This will be achieved by the County Council:</p> <ul style="list-style-type: none">• Continuing to provide high quality advice, information and guidance to community transport schemes• Stimulating innovation and encouraging the adoption of best practice <p>As part of the measures to support Policy 3.3, the County Council will review the use of concessionary travel passes on 'other' transport services, including community transport under discretionary enhancements.</p>

7.Improving Safety and Security

7.1 This strategy was commented upon by one MP, four local planning authorities, six other stakeholders and one member of the public. These, together with the County Council's response, is summarised in Table 6.

Table 6: Summary of Comments Received about 'Improving Safety and Security'

Comment	County Council Response
<p>Policy 4.1</p> <p>This policy has the potential to conflict with policies 3.3 and 7.6. The use of engineering measures should be considered alongside softer measures to ensure a safer highway environment for motorists, cyclists and pedestrians whilst also considering the appearance of the street scene and its impact on the perception of place. Where engineering measures are used caution has to be applied to ensure that it does not further segregate users of the highway, particularly in locations where slower traffic speeds and greater pedestrian priority would be expected. A one size fits all approach will not be acceptable.</p> <p>Greater emphasis should be placed on lower speed limits. Consider widespread 20mph limits in residential areas and town centres.</p>	<p>We understand this concern and have amended the text accordingly.</p> <p>Policy 4.1 refers to altering speed limits for safety purposes, Policy 4.2 refers to continuing with the Speed Limit Review, and a text box will be included in Chapter 4 'Improving Safety and Security' about 20mph speed limit zones outside a number of Staffordshire's schools as part of a trial project.</p>
<p>Indicators and targets</p> <p>The appropriateness of injury accidents as a measure of safety is questioned due to future population growth and increased vehicle usage.</p> <p>Table 4.3 contains no output, indicator or target around injury prevention.</p>	<p>It is acknowledged that there will be some long-term population increases as well as increased usage of motorised vehicles. However, the County Council believes that road safety improvements can still be made against this backdrop. For example, vehicle safety continues to improve and car ownership continues to rise, but casualty numbers continue to fall.</p> <p>We disagree and take the view that injury prevention will be an outcome of the outputs, indicators and targets listed in Table 4.3.</p>
<p>The LTP should incorporate some urban design principles within the 'Maintaining Safety and Security' and 'Improving Health and Quality of Life' Chapters.</p>	<p>We agree that reference should be made to urban design principles within Chapter 4 'Improving Safety and Security'. The Staffordshire Walking Strategy (Appendix N) and the Staffordshire Cycling Strategy (Appendix M) also deal with this issue.</p>

Comment	County Council Response
<p>Data lead safety engineering schemes are welcomed but must give consideration to protected landscapes with appropriate consultation and mitigation.</p>	<p>The LTP states that engineering measures must be based on robust data and that no two schemes are the same. It goes on to say that due to the nature of the street scene and/or local environment, measures that are appropriate for one location may not be suitable for another.</p> <p>Also see Policy 7.6 about how we will improve the image of townscapes, Policy 7.7 about how we will enhance biodiversity and landscape where possible, and Policy 2.6 about how we will engage in open communication with those affected by traffic and highway improvement work.</p>
<p>Policies for safety and security should include encouragement of more travel by train and bus which are statistically safer than car or cycle.</p>	<p>One of the measures to deliver Policy 4.2 is the promotion of public transport (bus and rail) which has a better safety record than other modes of travel.</p>
<p>Table 4.1 does not include highway layout as an explanation for road accidents.</p>	<p>We agree and this information will be added to Table 4.1.</p>
<p>Graph 4.4 and accompanying text would be improved if it were cross referenced against the proportions that these modes represent.</p>	<p>We agree and Graph 4.4 will be amended accordingly.</p>

8. Reducing Road Transport Emissions and Their Effects on the Highway Network

8.1 This strategy was commented upon by one MP, four local planning authorities, five other stakeholders and two members of the public. These, together with the County Council's response, is summarised in Table 7.

Table 7: Summary of comments received about 'Reducing Road Transport Emissions and Their Effects on the Highway Network'

Comment	County Council Response
<p>Policy 5.1</p> <p>There is a risk within this policy that it could lead to the unnecessary removal of trees. A commitment to the provision of a tree inventory for all or at least some of the highway tree stock could assist SCC in targeting limited resources.</p> <p>There is no mention of encouraging train travel which is the most obvious way to achieve less travel by the motor vehicle.</p>	<p>This consultee has provided more details about this issue within their response to the TAMP consultation. Therefore, this issue will be looked at as part of our response to the TAMP consultation.</p> <p>We agree that encouraging people to use trains (and other sustainable transport modes) is a way to achieve less travel by the motor vehicle. One of the measures to deliver Policy 5.1 is the promotion (and running) of schemes that encourage the take-up of smarter travel modes.</p>
<p>Policy 5.4</p> <p>The policy is supported but the means of providing shade is not specified – the reference to the role of trees needs to be more explicit. Also there is no mention of whether SCC itself will commit to the provision of trees.</p>	<p>We agree and the text will be amended accordingly.</p>
<p>Indicators and targets</p> <p>Include an indicator that measures length of new routes for cyclists, walkers and horse riders.</p> <p>A measure of the number of green travel plans will address policies 1.1, 1.3, 1.5, 3.1, 5.1 and 6.1</p>	<p>In the LTP we are generally concerned with monitoring outcomes rather than outputs. The length of new routes for walkers, cyclists and horse riders, together with numbers of travel plans, are output indicators (i.e. they do not measure any increase or decrease in walking/cycling/riding). There is also the further issue that we will not be able to deliver a set length of new route each year as this is dependent upon funding levels and priorities for that year.</p> <p>The collection of robust data for travel plans is difficult, as is the definition of 'travel plan'. There is, however, the potential to monitor the number of travel plans secured as part of a planning consent. This would not be included within the main LTP document as the nature of the indicator has very little value.</p>

Comment	County Council Response
<p>For travel plans to succeed, the Council needs to concentrate on improving public transport links.</p>	<p>Whilst we understand this concern, we consider that improving public transport links is adequately covered in Chapter 3 'Making Transport Easier to Use and Places Easier to Get to' and will be further supported by the preparation of a Passenger and Accessibility Management Plan (PAMP) in 2011/12. The PAMP will describe the authority's short to medium term plans for integrated public transport provision and will include criteria to determine investment in supported bus services in light of the future reductions in the revenue budget.</p>
<p>We should wait until battery technology is sufficiently advanced before it can be considered as an alternative.</p>	<p>Momentum is building now for the more widespread use of electric cars. The County Council is currently part of a regional 'Plugged in Places' bid, which aims to push electric cars. We need to take action now so that people will buy electric cars when they roll off the production line.</p>
<p>This chapter should head the report and also include the subject of fossil fuel depletion. Accelerating power demands of the UK require a radical breakthrough to an extent not previously envisaged.</p> <p>Please take notice of warnings regarding the end of cheap oil and the massive changes needed in the West to tackle this.</p>	<p>Climate change and its effects is an important issue for the County Council. It is central to Chapter 5 'Reducing Road Transport Emissions and Their Effects on the Highway Network' of the LTP and the County Council has developed a Climate Change Strategy and various Adaptation Plans (www.staffordshire.gov.uk/environment/climatechange/keydocs/).</p> <p>County Councillors have set the LTP priorities as:</p> <ul style="list-style-type: none"> • Supporting growth and regeneration. • Maintaining the highway network. • Making transport easier to use and places easier to get to. <p>The issue and consequences of 'Peak Oil' will be included within the LTP's Introduction.</p> <p>The issue and consequences of 'Peak Oil' will be included within the LTP's Introduction.</p>
<p>Reducing transport emissions and improving health objectives include outputs of having less people affected by air pollution. This is flawed if there are increases in population.</p>	<p>The target of reducing emissions resulting from transport is a per capita figure and therefore is not flawed by a population increase.</p>

9. Improving Health and Quality of Life

9.1 This strategy was commented upon by three local planning authorities, five other stakeholders and one member of the public. These, together with the County Council's response, is summarised in Table 8.

Table 8: Summary of Comments Received about 'Improving Health and Quality of Life'

Comment	County Council Response
<p>Policy 6.6</p> <p>An obvious way to reduce emissions is to encourage more rail electrification as well as more travel by train and bus. Reducing speed limits also reduces fuel consumption and hence emissions.</p>	<p>One of the measures identified to help to deliver Policy 5.2 is lobbying Government, Network Rail and train operating companies to electrify more of the county's rail lines. It also refers to encouraging individuals to undertake eco-driver training. Eco-driver training teaches drivers to make simple improvements to their driving style (including speed, acceleration and braking), which can help to reduce most drivers' fuel consumption by around 15%.</p>
<p>Health benefits should not be overstated as the impacts may be marginal compared to other factors.</p>	<p>We understand this concern and have amended the text accordingly.</p>
<p>Indicators and targets</p> <p>The appropriateness of the obesity indicator and target is questioned as a measure of the use of smarter travel modes.</p> <p>Tables 6.2 and 7.1: we would like to see indicators and targets refer to public transport and cycling.</p> <p>How will we measure the impact of the LTP on improved health, e.g. physical activity levels, reduced obesity levels etc?</p>	<p>Whilst the measure of obesity will still be a proxy indicator, there will not be a target attached to it.</p> <p>The mode share of journeys to school referred to in Table 6.2 will measure the levels of walking, cycling and use of public transport to schools. However, there are no plans to include a target for this indicator. Indicators and targets relating to public transport are set out in Chapter 3 'Making Transport Easier to Use and Places Easier to Get to'.</p> <p>Proposed indicators that will help to measure the impact of the LTP on improved health, include:</p> <ul style="list-style-type: none"> • Obesity levels (all). • Obesity levels (child). • Frequency of exercise to recommended level. • Mode share of journey to school. • Levels of recreational cycling. <p>It is recognised that we are unable to calculate the size of the LTP's contribution towards these indicators as there are many other contributing factors.</p>
<p>Currently the role of the local transport authority in health is under played. The introductory statement gives a negative feel to the chapter and needs to stress the importance and potential impact of the wider determinants, of which transport is a key factor.</p>	<p>We agree that the opening statement can be made more positive and the text will be amended to reflect this. The Health Impact Assessment has examined the impact of the LTP on all of the wider determinants of health and this is found in Appendix E.</p> <p>We will also add text relating to the recent Health White Paper.</p>

<p>The LTP needs to reflect the Government’s future plans to move the health function of public health to the County Council, as outlined in the recent White Paper. Healthy Lives Health People November 2010.</p>	<p>We agree and the text will be updated to reflect this.</p>
<p>Reference should be made to the joint Staffordshire Health and Well-being Strategy 2010-2013.</p>	<p>We agree and amendments have been made, including to Appendix D.</p>

10. Respecting the Environment

10.1 This strategy was commented upon by three local planning authorities and three other stakeholders. These, together with the County Council’s response, is summarised in Table 9.

Table 9: Summary of Comments Received about ‘Respecting the Environment’

Comment	County Council Response
<p>Policy 7.1 This policy should refer to the Special Areas of Conservation.</p> <p>Minimising flooding, soil erosion and pollutants entering watercourses – should this emphasise the use of SuDs more?</p>	<p>Special Areas of Conservation are mentioned throughout Chapter 7 ‘Respecting the Environment’ and specifically in Policy 7.8 and Box 7.4.</p> <p>Whilst SuDs are an effective way of dealing with this issue, resources are only available to provide this as part of new/improvement schemes.</p>
<p>Policy 7.6 The principle is supported but should not be restricted to heritage assets. There needs to be a step change in highway design to make places more attractive and pedestrian cyclist friendly.</p> <p>The policy should commit to the adoption of Manual for Streets and the Manual for Streets 2 Guidance. A commitment to reducing street clutter would also reinforce the reference to removing superfluous/ redundant street furniture under this policy.</p> <p>The LTP should ensure that care is taken within the rural setting, where the impact of large and inappropriate street furniture has a detrimental effect on the landscape, while historical street furniture may be more in keeping with its surroundings.</p>	<p>We agree and will amend the Staffordshire Walking Strategy (Appendix N) and the Staffordshire Cycling Strategy (Appendix M) to reflect this.</p> <p>We agree and the text will be amended accordingly.</p> <p>We agree and Policy 7.6 will be amended to reflect this.</p>

Comment	County Council Response
<p>Policy 7.7</p> <p>This policy should make provision for incorporating wildlife tunnels/grids where possible.</p> <p>The policy should also include the word “townscape”.</p> <p>Where such opportunities occur in the Peak National Park, AONB, Special Area of Conservation or Special Protection Area then consultation is necessary with the appropriate representatives.</p> <p>We agree with the policy but feel that the first five bullet points would sit better in Chapter 5 (having little to do with biodiversity).</p>	<p>Whilst we understand this concern, we believe that it is already implied within Policy 7.7. The Policy recognises the potential negative impacts of road traffic on biodiversity including being a barrier to species movement and road mortality of individual animals.</p> <p>We disagree as it is clear that Policy 7.6 is about improving the image of townscapes and ensuring that heritage assets on the highway remain as close to their original appearance as possible. Policy 7.7. is about enhancing biodiversity and landscape wherever possible.</p> <p>We agree and will ensure that in such circumstances, the relevant body/bodies are consulted.</p> <p>Whilst we understand this concern, we have decided to keep these within Policy 7.7 as they are about the quality of the rural landscape.</p>
<p>Policies 7.1-7.6</p> <p>Specific reference to the role of trees should be given.</p> <p>The policies are weak regarding the needs of the urban realm.</p>	<p>The text will be amended accordingly.</p> <p>We disagree and believe that these policies are all relevant to the urban realm.</p>
<p>Indicators and Targets</p> <p>The appropriateness of the CO₂ emissions indicator as a measure of pollution is questioned.</p> <p>Tables F and G: would like to see indicators and targets refer to public transport and cycling.</p>	<p>The indicator and target for reducing emissions resulting from transport is a per capita figure and therefore is not flawed by any increase in population. However, we recognise that our contribution towards reducing per capita CO₂ emissions will be difficult to quantify.</p> <p>(It is understood that this refers to Tables 6.2 and 7.1). The mode share of journeys to school referred to in Table 6.2 will measure the levels of walking, cycling and use of public transport to schools. However, there are no plans to include a target for this indicator. Indicators and target relating to public transport are set out in Chapter 3 ‘Making Transport Easier to Use and Places Easier to Get to’.</p>
<p>The “soft estate” does not include any reference to tree numbers or even the area occupied by them.</p>	<p>The consultee has provided more details about this within their response to the TAMP consultation. Therefore, this issue will be looked at as part of our response to the TAMP consultation.</p>

Comment	County Council Response
<p>We urge that light sources should not be visible beyond the area they intend to illuminate.</p>	<p>Unfortunately it is virtually impossible to prevent the light source from being visible from an area outside that for which it was intended because of:</p> <ul style="list-style-type: none"> • Column mounting height • Carriageway gradient • Locality/proximity of properties <p>The County Council undertake all street lighting activities in accordance with national guidance so as to minimise the unwarranted effects of street lighting. Policy 7.3 sets out how the County Council intend to reduce the negative impact of artificial light.</p>

11. Appendices and Comments of a General Nature

- 11.1 Comments relating to the appendices were received from five local planning authorities, three other stakeholders and three members of the public.
- 11.2 Comments of a general nature regarding the LTP Strategy Plan were received from two local planning authorities, nine other stakeholders and four members of the public.
- 11.3 Changes to the appendices and Strategy Plan have been made in light of the comments we have received. The County Council's responses to specific comments are available on request.