

## 4 Strategic Environmental Assessment (Environmental Statement)



## CONTENTS

<b>1.</b>	<b>BACKGROUND .....</b>	<b>5</b>
<b>2.</b>	<b>SEA DOCUMENTS .....</b>	<b>5</b>
<b>2.1</b>	<b>Scoping Report .....</b>	<b>5</b>
<b>2.2</b>	<b>Environmental Report .....</b>	<b>5</b>
<b>2.3</b>	<b>SEA Statement .....</b>	<b>5</b>
<b>3.</b>	<b>RESPONSES TO CONSULTATION .....</b>	<b>6</b>
<b>3.1</b>	<b>Response process .....</b>	<b>6</b>
<b>3.2</b>	<b>Overview of responses .....</b>	<b>6</b>
<b>4.</b>	<b>ALTERNATIVES .....</b>	<b>22</b>
<b>5.</b>	<b>MONITORING THE IMPLEMENTATION OF THE PLAN .....</b>	<b>23</b>
<b>5.1</b>	<b>Aims of monitoring .....</b>	<b>23</b>
<b>5.2</b>	<b>Methodology for monitoring .....</b>	<b>23</b>



## I Background

In order to meet the new Environmental Assessment of Plans and Programmes Regulations, Statutory Instrument 2004 No. 1633, it is required that a Strategic Environmental Assessment (SEA) is carried out on the Second Buckinghamshire Local Transport Plan (LTP). The LTP requires assessment because it is a plan that has the potential to have significant environmental effects and which can also set the framework for environmental impact assessments (EIA) of individual transport projects.

SEA extends the assessment of environmental impacts from individual development projects to the broader perspective of regional, county and district level plans. The main purpose of the SEA is to evaluate whether the plan will result in any significant environmental effects (both positive and negative). If significant negative effects are predicted, then the SEA aims to make recommendations as to how these can be avoided, offset or reduced. A programme to monitor all significant effects during the lifetime of the plan must be prepared as part of the SEA.

## 2 SEA Documents

As part of the SEA process for the Buckinghamshire County Council LTP 2006-11, there have been three documents produced in a number of SEA stages. These include: -

- Stage A – Setting the context and establishing a baseline
- Stage B – Deciding the scope of SEA and developing alternatives
- Stage C – Assessing the effects of the plan
- Stage D – Consulting on the draft plan and the Environmental Report
- Stage E – Monitor the significant effects of implementing the plan of the environment

### 2.1 Scoping Report

The Scoping Report was the first document as part of the SEA Process and was published on the 17/01/05. The Scoping Report documented on Stages A and B of the SEA process and was consulted on by the four Statutory Environmental Bodies and the other related organisations. They included: -

- English Nature
- English Heritage
- The Environment Agency

- Countryside Agency
- Berks Bucks & Oxon Wildlife Trust
- Chilterns AONB Conservation Board
- Aylesbury Vale District Council
- Chiltern District Council
- South Bucks District Council
- Wycombe District Council
- Local Health Authority
- Internal Buckinghamshire County Council Departments

### 2.2 Environmental Report

The Environmental Report was the second document as part of the SEA Process and was published on the 19/08/05. The Environmental Report documented on Stages C and D of the SEA process. Again the report was consulted on by the four Statutory Environmental Bodies and the other bodies as described previously.

The results of the consultation on the Environmental Report have informed the preparation of an 'SEA Statement', which is documented in this report.

### 2.3 SEA Statement

As a result of the consultation on the Environmental Report the SEA Statement documents on Stage E. The directive requires that responses from the consultation of the SEA Environmental Report be 'taken into account' during the preparation of the Final LTP. This includes detail on: -

- Ways to which responses to consultation have been taken into account
- Changes to or deletions from the plan in response to the consultation of the SEA Environmental Report
- Discussion of alternatives to the plan
- Confirmed or modified monitoring measure in response to consultation

### 3 Responses to consultation

As stated earlier, the SEA Environmental Report was published and distributed to the four Statutory Environmental Bodies and other related organisations on 19/08/05. A covering letter accompanied the Report advising on the content, its implications and a deadline date for responses. Respondents were given three months to respond and these responses alongside those received for the whole plan were used in the development of the Final LTP for March 2006.

#### 3.1 Response process

Once responses were received (hard and electronic copies) details of the respondents, date and comments were input into **Table 1: Responses from SEA Environmental Report for Buckinghamshire County Council Provisional LTP 2006-11**. A number of procedures were then taken to ensure all comments were reviewed, they include: -

- Comments were segregated to ensure they focused on a particular topic, table, figure, paragraph, page...etc
- Any comments / sentences such as amendments, deletions, queries, recommendations, suggestions...etc were then highlighted as needing a response
- The comments were reviewed by the SEA Environmental Report / Statement author and then passed on to the relevant LTP theme holder for a joint discussion on how to respond to the comment
- Once a response to the comment was noted an action was developed in order for the comment to be acknowledged
- If the comments were suggesting simple deletions or amendments, then these were done.
- If, however the comment was specific and affected changes in policy, strategy, schemes and assessment, then other LTP theme holders were informed as there are cross linkages between all LTP themes

#### 3.2 Overview of responses

Initial comments regarding the SEA Environmental Report were of a positive nature. They include comments such as: -

***‘The Strategic Environmental Assessment provides a useful tool for determining the significant effects of the plan on the environment’***

***‘We were pleased to see that habitat creation and consideration of networks of habitats has been included, as well as the other identified opportunities’***

***‘Overall I found the report a useful step forward in identifying and minimising impacts on cultural heritage, and will be positive if the Environmental Guidelines are extended to all sensitive areas’***

***‘This document is a positive step forward for the LTP’***

The above comments from environmental bodies reinforce the positive effect of the SEA on the development of the LTP. It has not only allowed transport schemes, policies and strategies to be environmentally assessed, but has also helped to refine how transport services can improve current and future transport impacts on our environment.

Overall there were no major changes needed for any objectives, policies or strategies for the SEA and LTP. The only changes included an alternative to certain words, which as stated earlier reflected the nature of the environmental topic.

**Table I: Responses from SEA Environmental Report for Buckinghamshire County Council Provisional LTP 2006-11**

From	Date Received	Comment	BCC Response	Action
Senior Scientific & Health Protection Officer  South Bucks DC	4/11/05	<p>The Strategic Environmental Assessment provides a useful tool for determining the significant effects of the plan on the environment. The assessments highlights that LTP Objective 4 'Increasing and building road capacity' is incompatible with a number of SEA Objectives. I would support the mitigation measures proposed and consider it particularly important for the County Council to request that the Highways Agency consider variable speed limits for the M4, M40 and the M25 motorways, for which SBDC have declared an Air Quality Management Area. Additional mitigation measures should be considered to reduce the impact of increased road capacity</p> <p>Objective 1 of the LTP 'Keeping traffic moving' will play an important role in mitigating the effects of increased road capacity but no specific cross-reference is made</p> <p>The SEA also identifies that LTP Objective 3 'Managing demand and reducing the need to travel' is incompatible with SEA Objective H 'Increase access to facilities for wider communities to reduce social exclusion'. Through careful planning it is possible to improve access to facilities without encouraging increased travel. Mix use developments are one example of where the provision of facilities may reduce the need for travel</p> <p>It is noted that a number of Air Quality Targets are yet to be set. I would recommend that these targets are set in consultation with the Bucks Air Quality Management Group</p> <p>As a minor point, it should be noted that SBDC offices are now in Denham, Chapter 11 of the document identifies that a copy of the document is available in Slough</p>	<p>It is the role of the District Councils to ensure that measures to improve air quality along the stretch of motorway AQMA are developed with the Highways Agency. Buckinghamshire County Council's role is to support the District Council in this process</p> <p>References to 'keep traffic moving' include traffic management measures, tackling congestion hotspots, improvements to transport infrastructure...etc (all mentioned throughout document either in tables, figures and sections)</p> <p>The air quality targets were difficult to set at the time due to variance in air quality monitoring. Air predictions for the future are based on models</p> <p>BCC mistake</p>	<p>We will continue to support and strengthen partnership working with the District Councils in air quality and AQMA improvements. We are continuing to monitor the progress of the pilot Active Traffic Management (ATM) along the M42 that attempts to reduce congestion and improve journey time reliability</p> <p>Further reference to 'keep traffic moving' will be added to section 8.3.4 Air Quality</p> <p>Air quality targets have been agreed on between the Air Quality professionals at DC and the BAQMG. This will be continually consulted on</p> <p>Will be amended for this and subsequent BCC documents</p>

<p>Conservation Officer</p> <p>English Nature Thames &amp; Chilterns Team</p>	<p>7/11/05</p>	<p>As stated in our letter of 7 February 2005, an appropriate target should be set within Appendix 2 – Environmental Baseline Summary, with regard to ‘Other designations’ within the Biodiversity Topic. This could be done in a similar fashion to that done for SSSIs, by comparing the total number of local wildlife sites (including County Wildlife Sites, Local Nature Reserves and Roadside Verge Nature Reserves) to those that are in favourable or recovering conservation condition and setting an appropriate target after consultation with the Buckinghamshire County Council Countryside Department. The Buckinghamshire and Milton Keynes Environmental Records Centre should be noted and utilized as a data source for monitoring local wildlife site status</p> <p>With regard to Appendix 1, entitled ‘Review of other plans policies and programmes’, Planning Policy Statement 9: Biodiversity and Geological conservation (PPS9), has been formally adopted and should be referred to on a going forward basis in connection with the LTP development process</p> <p>In addition, the Biodiversity sections of both Table NTS2, ‘Significant effects on SEA topics’ and Section 8.3.7 of the Report, ‘Biodiversity, fauna and flora’, currently refer to ‘cultural heritage’ instead of ‘Biodiversity’. This should be revised accordingly (we assume that this is a clerical error and that the conclusions presented in the sections referred to, namely, that the LTP itself will not have a major impact on biodiversity, but that there are likely to be major cumulative effects on biodiversity when other regional transport plans are considered, will remain the same)</p>	<p>The baseline data stated in the SEA Environmental Report, was the data currently available at the time</p> <p>PPS9 and other Planning and Policy Statements/Guidance’s have been referenced in the Final LTP</p> <p>BCC clerical error</p>	<p>BCC will look into the monitoring and addition of other indicators through larger and smaller environmental centres in relation to the specific topics</p> <p>Amended</p>
<p>Conservation &amp; Planning Officer</p>		<p>Thank you for consulting with the Berks, Bucks &amp; Oxon Wildlife Trust (BBOWT) in relation to various aspects of the Environmental Report and the plan itself are detailed below</p>		

<p>Berkshire, Buckinghamshire &amp; Oxfordshire Wildlife Trust</p>		<p>European Habitats Directive (92/43/EEC) – Appropriate Assessment</p> <p>Whilst it is encouraging that the Council has already identified the need for ‘Appropriate Assessment’ in relation to the A355 route strategy and its potential effects on Burnham Beeches SAC, we have concerns that in light of a recent European court ruling, this may not be sufficient to satisfy the legal obligations of the European Habitats Directive</p> <p>The requirement of the European Habitats Directive (92/43/EEC) is in respect of ‘any plan or project’, which has the potential to significantly affect a European site (i.e. SAC or SPA). Given that the county plays host to three significant SACs, it is the duty of the Council (as competent authority) to establish whether the LTP is likely to have significant effects on any/all of these designations</p> <p>You may be aware of the recent judgment made by the European Court of Justice (20th October 2005) on the case regarding ‘Failure of a Member State to Fulfil Obligations – Directive 92/43/EEC – Conservation of Natural Habitats – Wild Fauna and Flora’ (Case C-6/04: Ireland), in which it was upheld that the UK had not sufficiently transposed into the UK Law the need for appropriate assessment with regard to land-use plans (Article 6(3) and (4) of the Directive). Para 53 of the Court Judgement states:</p> <p>“According to the Commission, although land use plans do not as such authorise development and planning permission must be obtained for development projects in the normal manner, they have great influence on development decisions. Therefore land use plans must also be subject to appropriate assessments of their implications for the site concerned”</p>	<p>A Transport Strategy for Burnham Beeches has been produced for City of London and BCC by TTR Consultants. It incorporates a number of objectives and short, medium and long term actions, which can hopefully satisfy the legal obligation of the European Habitats Directive</p> <p>All major LTP schemes, which are associated with the surroundings of a SAC, have been appropriately covered within the SEA Environmental Report</p>	<p>Continue partnership working to ensure Burnham Beeches is protected from transport impacts through the short, medium and long term actions</p>
--	--	--	---	---

	<p>The message to be taken from this is that it is not enough to simply deal with potential impacts to European designations on a case-by-case basis, they have to be accounted for at strategic planning stages in order to ensure that in-combination/cumulative effects are sufficiently accounted for. In other words, it is the plan itself that should be subject to appropriate assessment (although there may be the need for appropriate assessment of individual schemes as and when they are identified)</p> <p>I appreciate that the ruling (as mentioned above) is a recent development in terms of how local authorities should deal with the issue of appropriate assessment, and so it is understandable that the provisional plan has not yet had opportunity to incorporate new provisions. However I would welcome explanation of how the Council intends to incorporate appropriate assessment of the Local Transport Plan/SEA, and look forward to further consultation on this matter</p> <p>Biodiversity, Flora &amp; Fauna (section 3.3.7) We welcome the inclusion of a comprehensive baseline of the existing nature conservation designations across the County, and were especially please to see Figure 3.8, which illustrates the geographical extant of these sites and includes the County Wildlife Sites</p> <p>However, I would reiterate points that BBOWT have made in the past in relation to the County's lack of up-to-date environmental data. The need for good baseline information is a requirement set out in Government policy (PPS9), and this is something which the County needs to address through a County Wildlife Sites project.</p> <p>Table 4.1 – Environmental Problems in Bucks Under the SEA topic 'Biodiversity, flora and fauna', European</p>	<p>Any schemes proposed in the LTP will be assessed through the Scheme Assessment Matrix (SAM) and other scheme appraisal techniques. This will help to ensure that schemes are prioritised and all shared priority objectives are met</p> <p>See Section 10 Monitoring in the SEA Environmental Report</p>	<p>Monitoring and process of decided indicators have been stated in the Environmental Statement</p>
--	---	---	---

	<p>conservation designations (i.e. SACs ) have not been included in the list for the column detailing locations. The omission should be corrected</p> <p>Other than this, we were please to see that habitat creation and consideration of networks of habitats has been included, as well as the other identified opportunities</p> <p>Table 5.1 – Scope of the Assessment The scope for assessment (in relation to biodiversity) is comprehensive and we welcome the identified need to address potential cumulative effects, as well as the some of the more common themes</p> <p>The table states that the scope of the assessment will focus on ‘Actions that affect Natura 2000 Sites’ if this is the case then is it the intention of the Council that the SEA also incorporates appropriate assessment of the LTP? If this is the case then this needs to be clearly stated at the beginning of the Environmental Report.</p> <p>Section 8 – Significant Effects Assessment Para 8.3.8 – Biodiversity, Flora &amp; Fauna The wording of this paragraph should be amended to make it more relevant to the heading, i.e. remove ‘cultural heritage’ and replace with ‘biodiversity’!</p> <p>The overall assessment that there are likely to be on significant effects on biodiversity may require updating to include the findings of any appropriate assessment to be undertaken.</p> <p>Table 9.2 – Other proposed mitigation and enhancement measures Under the heading of biodiversity we would welcome inclusion of a stated commitment to furthering the extent of land designated as Roadside Verge Nature Reserves. By bringing more land into management for nature conservation there is potential for both habitat enhancement and creation</p>	<p>SACs have been mentioned in section 3.3.7 Biodiversity, Flora and Fauna in detail. For Table 4.1 – BCC error</p> <p>This relates to a recent EC ruling which has found that the UK government did not properly implement the Habitats Directive, as they did not require AA to be carried out on plans and programmes</p> <p>BCC clerical error</p> <p>We strongly agree to habitat enhancement and creation. By designating further land more resources are needed to ensure the maintenance of the RVNR. A balance has to be struck between biodiversity and maintenance</p>	<p>SACs will be incorporated into Table 4.1</p> <p>It is currently unclear how this situation will unfold, however we will continue to monitor its progress</p> <p>Amended</p> <p>An extra proposed mitigation or enhancement has been included to Table 9.2 under Biodiversity to recognise inclusion of designating land to RVNR for habitat enhancement and creation</p>
--	--	---	---

		<p>Table 10.1 – Monitoring Measure</p> <p>In terms of biodiversity monitoring, we would not support the monitoring of a single species in isolation in order to assess the overall effectiveness of biodiversity policies</p> <p>We feel it would be appropriate to use Road Verge Nature Reserves (RVNR) themselves as a measure of the success of related biodiversity actions as well</p> <p>Reporting should include amount of land designated as RVNRs (with management plans), and condition of the habitat. The aim here would ultimately be to increase the amount of land designated, which would therefore be subject to more favourable management (e.g. cutting at appropriate times of the year etc), and increase the extant of RVNRs that are in ‘favourable condition’. By achieving these aims there should be benefits for both flora and fauna species, as opposed to only catering for one species</p> <p>Appendix I – Review of other plans, policies &amp; programmes Table A1.1 and the subsequent table should be amended to include ‘PPS9: Biodiversity and Geological Conservation’ (and the accompanying Government Circular), which was formally issued in August 2005 and supersedes PPG9 as national planning policy</p> <p>I hope that these comments prove useful in taking the plan through to the next stage. Should you wish to discuss any of the points raised please feel free to contact me</p>	<p>We measure the condition of road verges and this in turn contributes to the respective habitat targets in the biodiversity action plan e.g. neutral grassland</p> <p>BCC clerical error</p>	<p>Amended</p>
<p>Archaeological Service Buckinghamshire County Council</p>	<p>11/11/05</p>	<p>Thank you for consulting the County Archaeological Service on this report. Overall I found the report a useful step forward in identifying and minimising impacts on cultural heritage, and will be positive if the Environmental Guidelines are extended to all sensitive areas. I have consulted my conservation officer colleagues but not yet received responses – if any additional issues arise I will pass them on. My detailed comments are as follows:</p>		

	<p>Non-technical summary</p> <p>Cultural heritage also includes historic buildings and townscapes, including designated listed buildings and conservation areas of which there are large number. Unlike other sections there is no mention of impacts – new road construction could be harmful to archaeological sites and historic landscapes; insensitive proposals could harm sensitive rural landscapes and townscapes but careful design of new schemes could improve these historic environments and access to places of heritage interest</p> <p>There are many other areas of landscape importance outside the Chiltern AONB, including registered historic parks and gardens and other undesignated areas recognised through Historic Landscape Characterisation</p> <p>Table NTS1 We support the SEA objectives for cultural heritage and suggest a possible third objective to improve sustainable access to heritage assets thus supporting recreation and tourism</p> <p>Table NTS2 The opening statement that no significant effects on cultural heritage are likely from the proposals in the LTP is hard to reconcile with the following sentences and the need for new infrastructure. Surely significant impacts are likely, although in many cases acceptable mitigation may be feasible and some benefits may accrue. Whether the overall balance is positive, negative or neutral is hard to judge</p>	<p>Due to the range of environmental topics, the specifics of conservation areas have been mentioned in Biodiversity. Historic buildings should be recognised as Cultural heritage</p> <p>Table 9.2 Other proposed mitigation and enhancement measures, mentions measures for heritage</p> <p>Fig 3.5 Buckinghamshire landscape identifies attractive landscape and Table 9.2 recognise landscape beyond Chilterns</p> <p>Table NTS1 SEA, Topic Population, Objective 'Increase access to facilities for wider communities...' incorporates access to leisure (Heritage and tourist sites)</p>	<p>Historic buildings incorporated into Cultural Heritage</p>
--	---	--	---

	<p>Mitigation measures We support these subject to (i) add “...important landscape and historic areas.” (iv) Include archaeology within the “Construction Environmental Management Plan” – see note below for comments on improving provision. (vi) suggest a review of the guidelines to ensure they are appropriate to the rather different landscapes of north Bucks and that they have up to date coverage of heritage issues. Consultation with historic building conservation officers will be essential. Appropriate guidelines should also be applied to urban conservation areas</p> <p>Note on Best Value archaeological provision for new road schemes Securing “best value” in the evaluation and mitigation of major new road schemes is a particular concern of the archaeology service. Recent schemes in the county (Stoke Hammond bypass and Aston Clinton bypass, the latter a HA scheme) have followed procedures established in the 1990s and illustrate both their strengths and limitations. Each scheme involved desk-based assessment of route options and limited field survey/evaluation of the preferred route correctly identifying an alignment that avoided sites of national archaeological importance. Survey also identified some sites requiring mitigation through excavation but failed to properly identify their extent in all cases or the existence of other areas of interest, which were only discovered during the watching brief for construction. This uncertainty could lead to delays in construction and unforeseen costs both from the extra archaeological works and related contract delays. Recent research has indicated that this is a general limitation of “standard” 1990s evaluation techniques. Other concerns relate to requiring appropriate professional accreditation for archaeologists working directly or indirectly for the County Council on road schemes, the need to recognise historic landscape impacts as part of Environmental Assessment and route selection processes</p>	<p>Suggestion noted</p>	<p>Historic areas added</p> <p>Suggestion will be passed on to relevant party</p>
--	---	-------------------------	---

	<p>and the desirability of embedding research outcomes and public benefit. I suggest we hold a meeting with Highways and Jacobs Babbie’s archaeologists to consolidate and build on existing good practice, review recent experiences and update working practice where necessary</p> <p>Chapter 3: Environmental and Planning Context</p> <p>It would be worth making a distinction between the “heritage of roads” and “heritage affected by roads”. Roads are a distinctive element of our historic environment, including ancient lanes and holloways with prehistoric or medieval origins and a legacy of engineered Roman roads and post-medieval turnpikes. Associated with these roads are historic features such as bridges, hedges, milestones and toll booths. Other heritage assets (e.g. many buried archaeological sites) are unrelated to the modern road network but may be affected by new construction</p> <p>Chapter 4: Environmental Problems and Opportunities Table 4.1 - Archaeological sites are not limited to designated assets – to locations add undesignated sites of archaeological importance. To opportunities ... minimise damage to archaeological sites and secure “best value” mitigation. Under landscape, make reference to protecting historic landscape character</p> <p>Chapter 6 SEA Objectives and Indicators Table 6.1 - We support the SEA objectives for cultural heritage and suggest a possible third objective to improve sustainable access to heritage assets thus supporting recreation and tourism</p> <p>Fig 6.1 - LTP Objective 4 is likely to be incompatible with SEA Objective N (although to a degree the negative impact can be mitigated)</p>	<p>Agree with the suggestion</p> <p>The heritage of roads has been described in the SEA Scoping Report in detail. The SEA Environmental Report does mention in brief the importance of Roman roads in 3.3.6</p> <p>Agreed. Historic landscape has been referenced in the document</p> <p>Table NTSI SEA, Topic Population, Objective ‘Increase access to facilities for wider communities...’ incorporates access to leisure (Heritage and tourist sites)</p>	<p>BCC have excellent partnership working and this suggestion will be passed onto relevant parties to ensure we reinforce our partnership working with current and future associates</p> <p>Suggested amendments made</p>
--	--	---	---

	<p>Chapter 8 Significant Effects Assessment</p> <p>8.2.1 - Should also refer to Archaeological Notification Areas derived from the County Sites and Monuments Record. Most archaeological sites in the county are not scheduled</p> <p>8.3.7 - For the reasons given above (table NTS 2) the opening statement is hard to accept</p> <p>Chapter 9 Mitigation</p> <p>Table 9.1 - Under A418 upgrade, should include minimising impact on historic landscape character and cultural heritage.</p> <p>Table 9.2 - Support the wider adoption of “Environmental Guidelines for Management of Roads ...” subject to review of heritage content. Support proposals for cultural heritage subject to review of best value as noted above</p> <p>Table 10.1 - Note the absence of any indicators for cultural heritage. Could have an indicator for number of heritage assets harmed by or improved by transport schemes?</p> <p>Appendix 4 Background to LTP Major Schemes</p> <p>Western Link Road: the historic remains are Quarrendon scheduled ancient monument (medieval settlements, Tudor garden remains and ruins of St Peters Church)</p> <p>A421 Improvement/Dualling: Affects historic landscape of Whaddon Chase (medieval hunting forest), scheduled medieval bridge, Roman barrows and undesignated archaeological remains at Thornborough</p> <p>Crossrail: The Great Western Railway is the best-preserved early passenger railway in the world. The scheme affects historic Brunel-designed bridges</p>	<p>Agreed</p> <p>Landscape importance incorporates character and heritage</p> <p>Table 10.1 are just examples of monitoring measures. Appendix 2 provide information on Cultural heritage indicators</p> <p>Noted</p>	<p>Amended</p> <p>Extra details will be added to the Geographical column of Appendix 4</p>
--	---	---	--

	<p>Appendix 5-6 Aylesbury Western Link Road will have significant impacts on Quarrendon SAM affecting its setting and severing the site from the adjacent rural landscape.</p> <p>Crossrail assessment is wrong – see above. It should be flagged “orange” for the time being due to the lack of acceptable mitigation for listable Brunel bridges. Affects would be moderate/major and permanent. Mitigation is to identify options for preserving the bridges.</p>	<p>This has been stated already in Appendix 5-6 and mitigation measures suggested</p> <p>Agreed</p>	<p>Amended</p>
<p>Countryside Initiatives Buckinghamshire County Council</p>	<p>Local Transport Plan: Strategic Environmental Assessment</p> <p>Thank you for consulting the Countryside Initiatives Team. Generally I feel this document is a positive step forward for the LTP. My specific comments are as follows:</p> <p>3.3.5 Landscape/Townscape This section should make reference to the County Landscape Character Assessment contained within the Landscape Plan for Buckinghamshire Part I which can be obtained from myself or can be downloaded from the BCC website on <a href="http://www.buckscc.gov.uk/countryside/landscape/index.htm">http://www.buckscc.gov.uk/countryside/landscape/index.htm</a> This document provides an assessment of the landscape at county scale which would be more appropriate for inclusion/cross reference within the SEA that the national landscape character areas. Some of the zone descriptions in this documents make reference to the need to reduce the impact of major roads in the landscape or of the importance of quiet countryside lanes in helping to define the character of other areas. These considerations are important to refer to in the context of this SEA. The issues highlighted within this document could also supplement Table 4.1</p> <p>3.3.7 Biodiversity Figure 3.9 – I am not sure about the inclusion of Agricultural</p>	<p>Noted, as this is assessment can help with assessment of future transport and planning schemes and projects</p>	<p>Will be referenced with the section</p> <p>The Landscape document will be looked into</p>

	<p>Land grades 1&amp;2 on this plan – these do not have any specific biodiversity value (probably the opposite). It would be more appropriate to include priority habitat areas, which we have as a layer on the BCC GIS</p> <p>The reference to Roadside Verge Nature Reserves on Page 35 is welcomed</p> <p>Table 6.1 A suggested alternative wording for the objective for landscape is “Protect and enhance the character and local distinctiveness of landscapes and townscapes.”</p> <p>A suggested alternative wording for the objective for biodiversity is “Minimise the impacts of the transport system on biodiversity, in particular designated nature conservation areas and priority habitats and species and avoiding irreversible losses. Where possible include measure for habitat creation and enhancement.”</p> <p>8.2.1 The Buckinghamshire Landscape Character Assessment (see above) should also have been referred to here</p> <p>8.3.6 The opening sentence here is right to refer to the Chilterns but this issue applies across the county and the effect of small scale (and major) schemes outside the Chilterns AONB should be referenced also. The Bucks Landscape Plan prescribes a whole county approach to landscape, both to protect the character of small and rural lanes where these contribute to the local landscape character and to ensure appropriate design, mitigation and landscaping to new construction schemes</p> <p>8.3.8 I assume this should say natural heritage. It is accepted that the major impact will be from any new road schemes in relation to new development</p>	<p>The priority habitat GIS layer could not be found when producing the map</p> <p>Current wording ‘....different features and scale’ is not appropriate</p> <p>The current objective wording incorporates the suggested alternative wording</p>	<p>Will be amended</p> <p>Will be amended to ...’distinctive features and scale’</p> <p>Will be referenced within the section</p>
--	---	--	---

		<p>The reference to the management of Roadside Verge Nature Reserves in Table 9.2 is welcomed, as is the proposal to adopt the Environmental Guidelines for the Management of Roads beyond the Chilterns alone</p> <p>Table 10.1 Another suggested monitoring mechanism for biodiversity could be the condition of Roadside Verge Nature Reserves in general (i.e. favourable or unfavourable). Another one could be the effect of new road schemes on designated nature conservation sites (County Wildlife Sites of SSSI (i.e. the lower the better)</p> <p>Appendix 1 National Policies and Programmes PPS 9 Nature Conservation has now been published in final form</p> <p>Appendix 2 A target should be adopted for the condition of Roadside Verge Nature Reserves e.g. 95% in favourable condition</p> <p>It is generally not clear what the connections are between some of these indicators, targets and the LTP and perhaps this needs to be clarified. For example for improving the condition SSSIs is not down to the LTP. Perhaps targets need to be developed which set out that there should be no significant loss of biodiversity habitat due to new road schemes, or where new road schemes are necessary that opportunities to create new habitats will be maximised</p>	<p>We measure the condition of road verges and this in turn contributes to the respective habitat targets in the biodiversity action plan e.g. neutral grassland</p> <p>Noted</p> <p>See previous comment regarding RVNR</p> <p>Many of the indicators are from a number of environmental bodies and action plans (see Appendix 2 in SEA Environmental Report and Monitoring in this SEA Statement). Continued monitoring of these would show how transport schemes have affected monitored sites</p>	
<p>Planning Officer The Chilterns Conservation Board</p>	<p>16/11/05</p>	<p>General comment – the recognition given to the Chilterns AONB, its Management Plan, Chalk streams and the environment in general are welcomed</p> <p>Page 59 – The Board would favour option B (concentrate on environmental issues) as this would best meet its duties</p>		

	<p>under the Countryside and Rights of Way Act 2000</p> <p>Page 71 – With regard to mitigation measures for significant effects of major schemes at High Wycombe, the Board fully supports the examination (and implementation) of alternative site options outside the Chilterns AONB</p> <p>Appendix 1 – The AONB Management Plan is referred to twice as a local document that has been reviewed. Though this is welcomed it is not necessary. The references on page ii and xx need to be combined</p> <p>Appendix 4 – The reference on page I to Wycombe and the M40 fails to mention that the site to the south of the M40 is also AONB. The reference to the Pedestal roundabout should also mention the fact that this site is within AONB, page ii. On page vi the Coachway facility is mentioned and the south-west quadrant is specified, despite the fact that no specific location is mentioned in the RTS. This site is within the Chilterns AONB, which clearly needs to be mentioned. The AONB boundary at this point runs along the southern edge of the M40. Cressex Island is referred to on page vii as being within the AONB, it is not</p> <p>Appendix 5 – A5-1 Population, towards the end reference is made to M40 Junction 4 upgrade and the fact that there will be major effects on a long time/permanent basis. Reference should also be made to the implications of the Coachway proposals at this point</p> <p>Appendix 5 – A5-5 Landscape and Townscape, again towards the end reference is made to Wycombe Major Schemes. The reference to the Coachway facility states that the site is ‘on the edge of the Chilterns AONB’. As previously stated the south-west quadrant that is mentioned elsewhere is within the AONB, not on the edge. This clearly needs to be taken account of in the assessment</p>	<p>Table A1.1 page ii states the document reviewed and page xx explains in detail the objectives of the plan</p> <p>Agreed</p> <p>Agreed</p> <p>Noted</p>	<p>AONB will be mentioned and removed where described.</p> <p>Added</p> <p>Amended</p>
--	---	---	--

Principle EPO  Chiltern District Council	23/11/05	P21 – Estimated Annual Mean Graphs. Please confirm dataset used, as they do not look correct	Source provided. Data from <a href="http://www.airquality.co.uk">www.airquality.co.uk</a>	
		P20 – 3.3.3 MUST MENTION Bucks and Milton Keynes Regional Air Quality Strategy that has been developed jointly with the District Council and Bucks County Council to work to improve air quality in Buckinghamshire	Agreed	Amended
		P44 – Air, Congestion, Chiltern...includes M40, Woodburn green in Chiltern, this should be Wycombe, Berkhamsted Road should remain in Chiltern but is spelt Berkhamstead Road	Clerical error	Amended
		P67 – 8.3.4 Include Bucks and Milton Keynes Regional Air Quality Strategy	Agreed. The partnership work within the group and Strategy will help to improve air quality throughout the county	Added
		P37 – No reference to Environment Agency with regard to water	Noted	Reference to EA added
		P42 – No reference to Primary Care Trust		
		P12 – Deprivation, only Aylesbury and Wycombe mentioned. Do you have data for other areas?	Areas of worst health and employment deprivation provide by The Research Team at BCC	Reference to PCT added to Population, 3rd column
		Pvii – Under Climate Factors – no mention of things that may improve climate such as walking, cycling and public transport	Table NTS2, Pvii only highlights significant effects	
P12 – 3.3.1 Population. Last paragraph does not make sense				
P47 – Air Quality – Last paragraph ‘on 10%’ doesn’t make sense	10% change in traffic flow is considered to have an impact on air quality			

<p>Any references to the Bucks Air Quality Standard have been amended</p>	<p>The Bucks Air Quality Standard has been changed and agreed by District EPO</p> <p>Table 5.1 - The scope of the assessment indicates the general comments have been included in the SEA assessment. They are documented throughout the SEA Report and the Final LTP</p>
<p>P78 – Abandoned vehicles – This is subject to business case</p> <p>Vi in Appendices – Number of Exceedences of the Bucks Air Quality Standard. THIS MUST BE CHANGED to 38 µg/m3....35 is not agreed and am guessing is an error</p> <p>General Comments Generally no mention of area wide strategies to treat holistically. Could include: HGV routing, working with GPS data holders to influence routes for freight. Section 9.1 – Could include more on alternative fuels, improving infrastructure in Bucks</p>	<p>Table 5.1 - The scope of the assessment indicates the general comments have been included in the SEA assessment. They are documented throughout the SEA Report and the Final LTP</p>
<p>P78 – Abandoned vehicles – This is subject to business case</p> <p>Vi in Appendices – Number of Exceedences of the Bucks Air Quality Standard. THIS MUST BE CHANGED to 38 µg/m3....35 is not agreed and am guessing is an error</p> <p>General Comments Generally no mention of area wide strategies to treat holistically. Could include: HGV routing, working with GPS data holders to influence routes for freight. Section 9.1 – Could include more on alternative fuels, improving infrastructure in Bucks</p>	<p>Table 5.1 - The scope of the assessment indicates the general comments have been included in the SEA assessment. They are documented throughout the SEA Report and the Final LTP</p>

#### 4. Alternatives

As detailed in the SEA Environmental report, there were three alternatives considered for the LTP and they were assessed against the SEA objectives. An additional alternative was also assessed as good practice. It should be noted that none of the alternatives below have been adopted into the Final LTP 2006-11 as they individually do not provide a balanced range of options, which fulfill the Government's shared priorities and local needs and aspirations. Below the options are stated along with reasons for them not being accepted as part of the Final LTP.

##### Option A: Without the plan

The option would exacerbate existing problems and cannot be suitably mitigated. Without the LTP none of the shared priorities or local needs and aspirations would be met.

##### Option B: Concentrate on Environmental Issues - Reducing congestion through modal shift and improve air quality for human health/various ecosystems and natural environment features

The option would generally have a neutral or uncertain effect. With some objectives actively encouraged this would resolve existing issues / maximise opportunities. The option does take into consideration Tackling Congestion and Improving our Environment, however Enhancing Accessibility, Improving Safety and Maintaining and Managing the Transport Asset objectives are missing.

##### Option C: Concentrate on Economic Issues - Reduce congestion to provide efficient traffic flows for public and businesses while improving road safety through targeted maintenance

The option would have a mixture of neutral or uncertain effects and would need a number of changes to have a positive effect on the issues identified. The option does take into consideration Tackling Congestion, Maintaining and Managing the Transport Asset and Improving Safety, however Enhancing Accessibility, Improving our Environment objectives are missing.

### **Option D: Concentrate on Social Issues - Improving all safety issues concerning the public and provide healthier accessibility for the wider community**

The option would generally have a neutral or uncertain effect. With some objectives actively encouraged in its current form this would resolve existing issues / maximise opportunities. The option does consider Improving Safety, Enhancing Accessibility and Maintaining and Managing the Transport Asset, which would be needed for the latter, however Tackling Congestion and Improving our Environment objectives are missing.

## **5 Monitoring the implementation of the plan**

Monitoring the implementation of the plan (Stage E) is the final stage in the SEA process. Monitoring allows significant environmental effects of the plan's implementation to be identified and dealt with early on. As well as providing baseline information for future plans, it also helps with Environmental Impact Assessment (EIA) on projects and informing decisions.

As described in the SEA Environmental Report, the monitoring system (See **Table 2: Monitoring measures**) is being designed to fulfil the following requirements: -

- To provide baseline data for the next SEA and to provide a picture of how the environment / sustainability criteria of the area are evolving
- To monitor the significant effects of the plan; and
- To ensure that action can be taken to reduce / offset the significant effects of the plan

### **5.1 Aims of monitoring**

The SEA directive requires that monitoring be applied during the plans implementation, which starts in March 2006 when the LTP 2006-11 is adopted. However monitoring choices of objectives and indicators have been considered in the initial stages of the SEA process and during the preparation of the plan.

Much of the proposed monitoring data is already collated by the County Council and by outside bodies. We understand that data to be used for monitoring purposes is up to date and reliable for our needs of measuring the effect of our LTP

2006-11 on our environment.

As well as the SEA requirements (bullet pointed above) a number of aims have been developed to ensure the monitoring of SEA indicators meets not only the SEA directive requirements but also the County Council's expectations. This will help to provide a consistent monitoring process. The aims include: -

- Securing the indicators and objectives throughout the life of the LTP and SEA
- Ensuring that the data is of reliable and accurate source
- Acquiring the most up to date data for monitoring and measuring purposes

### **5.2 Methodology for monitoring**

A suitable methodology is outlined below to help follow the SEA directive requirements and meet the aims mentioned above. By following this process a regular and informative monitoring process can be developed and allow further partnership working between transport, planning and environmental services within the county and other environmental bodies.

1. A member of the Transport Policy & Strategy team at Buckinghamshire County Council will be responsible for the SEA monitoring process throughout the life of the LTP 2006-11 once adopted in March 2006
2. The member will follow the steps below to ensure that the SEA requirements and associated aims are adhered to
  - a. Understanding the full SEA process and its association with the LTP
  - b. Be aware of any changes to the SEA process and the LTP
  - c. Be responsible for the collection of monitoring data from sources and input into the relevant table
  - d. Updating the data whenever available
  - e. Reviewing the significant effects of the plan whenever appropriate
  - f. Ensuring that the SEA monitoring tables are available for County Council services and environmental bodies
  - g. Maintain and encourage partnership working with stakeholders
  - h. Keep informed of any new indicators and monitoring regimes

**Table 2: Monitoring measures**

SEA topic	Indicator to be monitored	Information required	Source	Frequency	Information quality	When to take remedial action	Remedial action to take
<b>Population</b>							
	Total population	% population breakdown in Bucks	Census	Yearly (when available)	Good Broken down into district and parish		
	% Population by age band	% population breakdown in Bucks	Census	Yearly (when available)	Good Broken down into district and parish		
	Population density	% population breakdown in Bucks	Census	Yearly (when available)	Good Broken down into district and parish		
	Index of multiple deprivations (rank of average ward score in each area. Low score indicates more deprived)	% population breakdown in Bucks	ODPM	Yearly (when available)	Good Broken down into district and parish	When elevated levels of deprivation affect general health in the ward	Identify if transport service is sufficient to key services such as hospital, GP, Shopping...etc
	Range of ward deprivation (1 = most deprived)	Within each Bucks districts	ODPM	Yearly (when available)	Good Broken down into district and parish	When elevated levels of deprivation affect general health in the ward	Identify if transport service is sufficient to key services such as hospital, GP, Shopping...etc
	No. of local communities with Transport Area Action Plans	No. completed	BCC	Monthly		If proposed actions within the area are not met on set completion dates	Prioritise uncompleted actions efficiently
	% children to and from school by different modes	% of schools in Bucks districts	BCC	Monthly	Good	If there is a fall in % of different sustainable modes	Increase the number of campaigns to encourage sustainable transport modes such as STP and initiatives such as 'Going for Gold' and 'Crocodile'  Identify possible sustainable transport modes and routes

	% of rural parishes with at least a minimum public transport service	%	BCC	Monthly	Good	If there is a fall in % of minimum service	Identify use of demand responsive transport and alternative transport modes
	No. of innovative rural transport services	No. completed	BCC	Monthly	Good		
	% of rural households at set distances from key services	%	BCC	Monthly	Good	If there is a fall in % of rural households at set distances from key services	Identify possible sustainable transport modes and routes  Identify why key services are not situated within set distance
	Mode travelled to work	% of people aged 16-74 in employment	Census	Yearly (when available)	Good Broken down into district	If % sustainable mode travelled to work decreases	Increase the number of campaigns to encourage sustainable transport modes such as WTP and initiatives such as 'Car Share'
	Car/Van ownership	% by county, region and Bucks districts	Census	Yearly (when available)	Good Broken down into district		Increase the number of campaigns to encourage sustainable transport modes
	Record crimes per 1000 pop: - domestic burglaries, violent offences, vehicle crimes	Includes domestic burglaries, violent offences, vehicle crimes	Thames Valley Police	Yearly (when available)	Good		Improving the safety of roads and pavements. This includes improving street lighting
	Net customer satisfaction rating: street lighting	Net	BCC	Monthly	Good	If the Net satisfaction decreases	Improve maintenance regime and use environmentally efficient street lighting
	Net satisfaction with bus stops	Net a. provision b. condition	NEMS / BCC	Monthly	Good	If the Net satisfaction decreases	Improve maintenance regime of bus stop provisions and conditions

Human Health							
	No. casualties per 100,00 population	Pedestrian	BCC	Monthly	Good		<p>Increase the publicity of road safety campaigns for all transport mode users of roads and pavements</p> <p>Review speed limit and safety implications in areas most affected such as signs and lines</p>
	No. killed or seriously injured in road collisions	No.	BCC	Monthly	Good		See above
	Proportion road resurfacing schemes	% In urban areas using 'low noise'	BCC	Monthly	Good		
	Sources of noise for the UK	surfacing % when available	Defra	Yearly (when available)	Moderate. Not specific to the region	<p>If independent noise measured or customer satisfaction surveys exceeds public tolerance</p> <p>If World Health Authority (WHO) guidelines are sufficiently exceeded</p>	<p>Increase publicity of noise campaigns such as 'cut your engines off while you wait'</p> <p>Identification of noise reduction surfaces at specific sites</p>
	Reported car use to work and businesses	Only where travel plans are in place	BCC	Monthly	Good		<p>Lower speed limits</p> <p>Increase the publicity and number of campaigns to encourage sustainable transport modes such as WTP and initiatives such as 'Car Share'</p> <p>Consult with and encourage large businesses to consider the above schemes</p>

	Bucks Car Share	i. No. of registered car shares ii. No. of active car sharers iii. No. or organisations involved	BCC	Monthly	Good		See above
	Media coverage	(PT) Public transport and (CW) Cycling & walking	BCC	Monthly	Good		
	Number of cycling trips	Only at representative counting points	BCC	Monthly	Good		Continue to promote and encourage cycling as a sustainable transport mode to schools, work and leisure through campaigns  Introduce feasible cycle routes within urban and rural areas
	Cycles parked at railway stations	1 day counts in Bucks carried out by CTC	BCC Census  BCC	Monthly	Good		See above  Continue partnership work with railways and provide further cycle parking stands
	General health assessment	% response .		Yearly (when available)	Moderate Only related to long term illness and not specifics such as asthma	If there is significant decrease in % of health	Correlate data with deprivation and access to key services to find a transport solution to improve health

Air Quality							
	No. of Air Quality Management Areas (AQMA)	No.	BCC	Monthly			Provide support to districts with their Air Quality Action Plans through traffic management measures, monitoring and campaigns to improve air quality within the AQMAs
	No. of exceedences in the Bucks Air Quality Standard for NO <sub>2</sub> (38ug/m <sup>3</sup> ) No. of monitoring sites in Bucks	Total yearly average of all exceeded sites	BCC	Monthly	Good Monthly and annual measurements provided	When annual measurements of NO <sub>x</sub> at sites exceed the standard	<p>The above measures can help improve air quality at the sites so that the declaration of an AQMA can be avoided.</p> <p>Publicise sustainable transport options; cleaner fuels; road side emission testing, moderating driving style</p> <p>Encourage bus partners to use green fuels and vehicle fleets, such that they meet 'Euro V' emissions standard</p> <p>Introduce further air quality monitoring (through DC) to investigate air quality (NO<sub>x</sub> and Particulate Matter) in areas around the exceeded site</p>
	No. of monitoring sites in Bucks	Includes passive diffusion and automatic monitoring	BCC	Monthly	Good		

	Proportion of journeys into urban area	All transport modes	BCC	Yearly	Good	Maintain the proportion of journeys into urban areas by car below the regional average of 68%.	Increase the publicity and number of campaigns to encourage sustainable transport modes to and from urban areas  Identify possible cycle/walking routes Develop further Quality Bus Partnerships Look into suitable parking within urban areas
<b>Climatic Factors</b>							
	CO <sub>2</sub> emissions - transport	Road traffic CO <sub>2</sub> projections	DfT	Yearly (when available)	Poor The data shows future projection with no account of other parameters, such as the Growth agenda	If Buckinghamshire's road traffic monitoring exceeds DfT projection	See above  Review and asses the schemes which promote greener fuels
<b>Landscape</b>							
	Area of Outstanding Natural Beauty (AONB)	No. hectares	Chilterns AONB	Monthly	Good	If number of hectares begin to decrease through transport impacts	Look into measures that can recover the lost land such as appropriate removal of transport significance so as to regenerate land
	Greenbelt	No. hectares	BCC	Monthly	Good	If number of hectares begin to decrease through transport impacts	See above
	Areas of Attractive Landscape	No. of	BCC	Monthly	Good	If number of hectares begin to decrease through transport impacts	See above
	Landscape Character Areas	No. of	Countryside Agency	Monthly	Good	If number of hectares begin to decrease through transport impacts	See above

	Landscape Changes	Character changes	Countryside Agency	Monthly	Good	If number of hectares begin to decrease through transport impacts	See above
	Tranquillity	Mapping	CPRE	Yearly (When available)	Poor Mapping data produced when available by source	If tranquillity begins to show a significant decrease	Look at implementation of quiet lanes, low noise resurfacing and noise barriers in appropriate areas
	Light pollution	Mapping	CPRE	Yearly (When available)	Poor. Mapping data produced when available by source	If light pollution begins to show a significant increase	Use of flat glass lights to reduce light spillage
<b>Cultural Heritage</b>							
	Designated sites	No. of designated sites	English Heritage	Yearly	Good	If No. of sites are proposed to decrease	Identify effective traffic management measures which can help reverse decrease
	Historic Landscape Classification	No. of areas affected	BCC	Monthly Monthly	Moderate. Data still being developed		Identify effective traffic
	Buildings at Risk	No. of registered buildings affected	English Heritage	Monthly	Good Good	If No. of sites are proposed to be at risk	management measures which can help reverse designation See above
	Monuments at Risk	No. of	English Heritage			If No. of sites are proposed to be at risk	

Biodiversity							
	Natura 2000 sites	No. of	English Nature	Yearly	Good	If No. of sites are proposed to decrease	<p>Improve and identify further effective traffic management measures which can help reverse decrease, such as improvements to air quality through prioritising routes, improving traffic flow and tackling congested spots around the sites.</p> <p>Improve and identify further effective maintenance measures such as seasonal grass, hedgerow and roadside verge cuttings to maintain biodiversity</p>
	Sites of Special Scientific Interest (SSSI)	No. of in Bucks and district	English Nature	Monthly	Good	If No. of sites are proposed to decrease	See above
	Condition of SSSI	i. % Favourable: ii. % Unfavourable Recovering: iii. % Unfavourable No Change: I iv. % Favourable Declining v. % Destroyed/Part Destroyed:	English Nature	Yearly	Good	If ii, iii, iv, v % increase	See above

	Other designations	i. National Nature Reserves ii. County Wildlife Sites: iii. Local Nature Reserves iv. Roadside Verge Nature Reserves:	English Nature / BCC	Monthly	Good	If there are loss of designated sites	See above
	Biodiversity Action Plan: Habitat Action Plans	Observe any changes in habitats	Bucks & MK Biodiversity Action Plan	Yearly (When available)	Good	If there are a decrease in habitats	See above
	Biodiversity Action Plan: Species Action Plans	Observe any changes in species	Bucks & MK Biodiversity Action Plan	Yearly (When available)	Good	If there are a decrease in species	See above
<b>Soil</b>							
	Soil loss to development	No. of hectares	BCC	Yearly	Moderate Includes loss to housing development and transport	If significant soil is lost through transport schemes	Identify measures which would provide minimal loss of soil from transport schemes  Ensure that soil is replaced and refined in other areas
<b>Water Resources</b>							
	Pollution incidents	% decrease	Environment Agency	Yearly	Moderate		Investigate how and if transport impacts have affected river quality, and develop measures for remedial action  Look to improve drainage systems which mitigate the pollution from road surface runoff

	River quality compliance	Chemical / biological water quality	Environment Agency	Yearly	Moderate Broad measurement of rivers in Buckinghamshire	If there is a decrease in river quality	See above
<b>Material Asset</b>							
	% Of highway works by tonnage undertaken with recycled materials including secondary aggregates	% of	BCC	Monthly	Good		
	Amounts of secondary/recycled aggregates used compared with virgin aggregates	Cost savings	BCC	Monthly	Good		

