

Summary of Responses to the Central Lincolnshire Draft IIA Scoping Report

Name of Consultee	Summary of Response	Central Lincolnshire Response	Recommendation
Natural England	Generally satisfied that the methodology and baseline information used to inform the scoping report appears to meet the requirements of the SEA Directive (2001/42/EC) and associated guidance.	Support welcomed	No change
Natural England	We are pleased to note the detailed reference to the National Character Areas set out within the baseline information on Landscape, Townscape and Historic Environment.	Noted	No change
Natural England	Suggest green infrastructure could be further considered within the Integrated Impact Assessment Framework under the social, health and climate change objectives emphasising the multifunctional benefits of GI.	Agreed	<p>Amend decision making criteria under health objective as underlined: <u>“Will it encourage and support healthy lifestyles? (for example through the provision of and/or improved access to green space)”</u></p> <p>Also under health, add following indicator: “Accessible natural green space”.</p> <p>Amend decision making criteria under climate change adaptation objective as underlined: <u>“Will it improve the adaptability of people, property and wildlife to changing temperatures</u></p>

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			and help avoid overheating in new homes <u>and built up areas (for example through new green space/tree planting)?</u>
Natural England	Note that protected species have been mentioned within the baseline information however we would suggest may want to refer to Natural England's standing advice on this issue which may find helpful.	Noted	No change
Natural England	<p>Suggest additional indicators to monitor the impact of planning applications on protected sites and species:</p> <ul style="list-style-type: none"> i. Number of planning applications with conditions to ensure works to manage/enhance the condition of SSSI features of interest; ii. Area of SSSIs in adverse condition as a result of development (information available from Natural England website). iii. Protected species – Quantified data might include numbers of applications where protected species are considered, numbers with conditions imposed to ensure working practices and works to protect/ enhance protected species, and numbers of planning applications which result in need for protected species licence in order to be carried out. iv. BAP habitat - created/ managed as result of granting planning permission (monitored via planning obligations) and which meet Biodiversity Action Plan targets 	<ul style="list-style-type: none"> i. Agreed ii. Agreed iii. Rewording existing indicators would address these comments iv. Rewording an existing indicator would address these comments. 	<p>Following changes made to the IIA Framework under Biodiversity and Green Infrastructure:</p> <ul style="list-style-type: none"> i. “Number of planning applications with conditions to ensure works to manage/enhance the condition of SSSI features of interest” inserted; ii. “Area of SSSIs in adverse condition as a result of development” inserted; iii. “Number of planning applications which result in the need for a protected species licence” and “Number of planning applications with

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			<p>conditions imposed to ensure working practices and works to protect/ enhance protected species" inserted.</p> <p>iv. Indicator on BAP habitats modified to read: "BAP habitat created and/or managed as result of granting planning permission and which meet BAP targets".</p>
English Heritage	<p>Note and welcome references to various policy and legislation on pages 36 and 37. Note that the NHPP is currently being redrafted and a new version will be published in 2015. Welcome reference to the Lincoln Townscape Assessment on page 41.</p>	Noted	No change
English Heritage	<p>Note that Central Lincolnshire does not currently have a heritage strategy. We hope that this will be addressed through the development of a local plan and its evidence base. We are happy to provide further advice as appropriate.</p>	Meeting arranged to discuss this requirement further.	No change
English Heritage	<p>Welcome reference to designated assets in baseline but in some cases data presented in table 10 doesn't match own records. Heritage Trust for Lincolnshire can provide figures for heritage at risk, including grade II listed buildings.</p> <p>Concerned no reference made to non designated assets. Details are held on the Historic Environment Record.</p>	<p>The data in table 10 was taken from the National Heritage List for England and the Heritage at Risk Register on English Heritage's website. Following discussion with NKDC Conservation Officer, agree text in brackets is confusing.</p>	<p>Remove the following text in brackets: 'archaeology assessments and 'includes schedule monuments (structural)'. Insert figure for grade II listed buildings at risk.</p>

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		<p>Agree to contact Heritage Trust for grade II listed buildings at risk.</p> <p>Agree reference should be made to non designated assets and where information is held.</p>	<p>Add text on importance of non designated assets, including local lists of sensitive buildings and the Lincolnshire HER.</p>
English Heritage	IIA Framework – welcome objective 6 on the historic environment.	Support welcomed	No change
Environment Agency	Page 4 Sustainability issues - suggest the Issue should be to 'reduce' fragmentation rather than 'minimise'. Minimising fragmentation is the wrong starting point. Moving from a net loss to a net gain is written into the NPPF. An objective of the CL GI Study and following Biodiversity Opportunity Mapping Study was to help identify how development could help reduce fragmentation and improve resilience.	Agreed.	<p>Bullet point amended to read:</p> <p>“Protection of an ecological network of designated sites, habitats and species and the need to enhance and extend this network to <u>reduce</u> fragmentation”.</p>
Environment Agency	Page 6 Sustainability issues - suggest bullet 1 is changed to better reflect the issue of development and flood risk for Central Lincs, to read: “Climate change over the coming century is likely to increase the likelihood and consequences of flooding. Despite this development demands in the greater Lincoln area are likely to result in pressure to develop in areas at risk of flooding. Development coming forward in such areas will need to mitigate the impacts of climate change, to be safe itself and not increase flood risk to others.”	Agreed	<p>Bullet point 1 of climate change issues amended as per comments.</p>
Environment Agency	Page 7 we suggest objective 4 is amended by replacing 'wild places' with 'natural environment'.	Noted.	<p>Amend objective 4 to read: “To conserve and enhance biodiversity across Central Lincolnshire and provide opportunities for people</p>

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			to access and appreciate wildlife and <u>the natural environment</u> ".
Environment Agency	<p>Page 29, Biodiversity and GI Policy Context – suggest following documents are included:</p> <ul style="list-style-type: none"> • EU Floods Directive (2007/60/EC) • National flood and coastal erosion risk management strategy for England • Lincolnshire Local Flood Risk Strategy 	Consider that these documents would fit better under the climate change (adaptation and mitigation) section.	Amend policy context under climate change (adaptation and mitigation) section to include documents as per comments.
Environment Agency	Page 44, Water Policy Context - suggest Catchment Abstraction Management Plans (CAMS) should be referred to within the policy context. There are a number of different CAMS of relevance to Central Lincolnshire.	Noted	Water policy context amended to include Catchment Abstraction Management Plans.
Environment Agency	<p>Page 45 we recommend that the most recent evidence from the River Basin Management Plans is taken into account.</p> <p>Section on Catchment Flood Management Plans is out of context here and might be moved to the section on flood risk currently page 68. Suggest this text is amended to:</p> <p>“The role of CFMPs is to establish flood risk management policies which will deliver sustainable flood risk management for the long term. The CFMP considers all types of inland flooding, from rivers, groundwater, surface water and tidal flooding, but not flooding directly from the sea. Currently the main sources of flood risk for people, property, infrastructure and the land are:</p> <ul style="list-style-type: none"> • River flooding from the rivers Witham, Trent and their tributaries. This includes both overtopping from rivers and any failures of raised embankments which protect development. These types of flooding are difficult to predict but could cause a severe risk to life, property and land; • Surface water drainage and sewer flooding, which has occurred in parts of Lincoln and Gainsborough; 	<p>RBMP comments noted.</p> <p>CFMP update and replacement noted. Agree to amended text.</p>	Section on CFMP moved to the policy context section under climate change (adaptation and mitigation).

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	<ul style="list-style-type: none"> Groundwater flooding which is a risk in the limestone chalk areas when there are high groundwater levels within the underlying rock and other low lying areas such as Sleaford and the surrounding area.” <p>Please note the Catchment Flood Management Plans are being updated and becoming Flood Risk Management Plans. These may be published and adopted whilst the CL Local Plan is being produced.</p>		
Environment Agency	<p>Page 46 final paragraph: The document states that <i>“The Lincoln Policy Area (LPA) and wider area of North Kesteven fall within the Witham CAM which classifies the region as having no water available.”</i></p> <p>Please note there is limited water availability are some parts of the Witham catchment. The use of water storage reservoirs remains an option in order to secure water resources. In addition it should be noted that the Environment Agency’s Strategic Water Transfer Scheme is an important piece of infrastructure which serves the area and beyond</p>	Noted	Text amended.
Environment Agency	<p>Page 47 the first paragraph should recognise diffuse pollution from agriculture as one of the pressures on water quality. The potential impacts of climate change on water availability / water stress should also be recognised.</p> <p>Groundwater Protection Zones. This section suggests that the Source Protection Zones are located only around Lincoln. The section should be amended. Suggested additional text:</p> <p>“Groundwater Source Protection Zones (SPZs) are areas of groundwater where there is a particular sensitivity to pollution risks due to the closeness of a drinking water source and groundwater flows. They are used to protect abstractions used for public water supply and other users such as mineral and bottled</p>	<p>Consider first para of 47 already covers climate change impacts. Agree text doesn’t currently cover diffuse pollution from agriculture.</p> <p>Comments on Groundwater Source Protection Zones noted.</p> <p>Comments on Surface Water Body Status noted.</p>	<p>Add diffuse pollution from agriculture to paragraph on pressures on water quality.</p> <p>Add suggested text on Groundwater Source Protection Zones.</p> <p>Update Table 11 with data from Environment Agency.</p> <p>Add water quality to</p>

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	<p>water plants, breweries, and food production plants. Generally the closer the activity is to a groundwater source, then the greater the risk.</p> <p>Source Protection Zones are present along the outcrop of the Lincolnshire Limestone. These Source Protection Zones are an important feature within the area covered by the Central Lincolnshire Local Plan including West Lindsey, North Kesteven and City of Lincoln. Development in these Source Protection Zones will be expected to comply with the Environment Agency's guidance document 'Groundwater Protection: Principles and Practice (GP3)'."</p> <p>Surface Water Body Status: Both surface and groundwater quality is subject to assessment through the Water Framework Directive. Current information which identifies which watercourses meet the good status is available on our Website under the heading DataShare. This should be used to update Table 1 and as an indicator in the Integrated Impact Assessment Framework for Objective 7. The % of rivers achieving a good or high status as part of the Water Framework Directive assessment for waterbodies.</p> <p>In the absence of the Local Plan water quality would also be likely to suffer.</p>		<p>section on future scenario without the plan.</p>
<p>Environment Agency</p>	<p>Page 55 Land use and soils Policy Context – NPPF, suggest adding two bullet points under Local Plans:</p> <ul style="list-style-type: none"> - whether the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation; - whether adequate site investigation information, prepared by 	<p>Agreed</p>	<p>Text on page 55 under policy context amended as per comments.</p>

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Agency	way this contradicts the guidance that the frequency of such occurrences is likely to increase. We suggest this is revisited.		extreme weather events amended.
Environment Agency	<p>Page 68 Paragraph on Flood Risk. This section needs to be better balanced to reflect flood risk elsewhere in the area. We suggest an amendment to the second paragraph: "The main flood risks within the Lincoln Policy Area for the urban areas of Lincoln are considered to be from fluvial flooding from the River Witham, River Till and the Fossdyke Canal, and for Gainsborough from the River Trent which is tidal.</p> <p>Please note we anticipate that our flood risk data for the river Trent will be updated this year and could have implications for West Lindsey's Strategic Flood Risk Assessment. We will keep you advised on this matter.</p> <p>Evidence gaps: Has the gap identified been filled by the publication of the Flood Map for Surface Water? This combines local detailed mapping with national mapping to form a single source of surface water flood mapping for England and Wales.</p> <p>Key Issues Bullet 1. We suggest the following changes. "Parts of the Central Lincolnshire area are at risk of flooding. Where development in areas of risk cannot be avoided consideration needs to be given to how that development can be made safe and to what standard."</p> <p>We suggest a new bullet point. Will new development be able to contribute towards a reduction in flood risk for existing development?</p>	<p>Agreed</p> <p>Noted</p> <p>Noted and agreed</p> <p>Agreed</p> <p>Agreed</p>	<p>Amend paragraph 2 of page 68 as per comments.</p> <p>No change</p> <p>Reference to surface water mapping removed under evidence gaps.</p> <p>Key issues section amended as per comments.</p> <p>Key issues section amended as per comments.</p>
Environment Agency	<p>Integrated Impact Assessment Framework:</p> <ul style="list-style-type: none"> i. Page 82 Biodiversity and green Infrastructure : replace minimise with reduce; ii. Pages 84-85 Natural Resources Water: The first of these 	<ul style="list-style-type: none"> i. Agreed ii. Agreed iii. Noted iv. Noted. The Water 	

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	<p>indicators should be amended to “the % of rivers and waterbodies achieving a good or high classification as part of the Water Framework Directive assessment for water bodies;</p> <p>iii. The second of these two indicators has become obsolete as a consequence of changes to our water quality assessment process and should be removed.’</p> <p>iv. One of the decision making criteria in section 7 p84-85 is “<i>Will the demand for water be within the available capacity of existing water systems infrastructure (e.g. water supply, sewage)?</i>” This decision making criteria and the associated indicator may need further revision in consultation with the Water Companies;</p> <p>v. We suggest that sewerage infrastructure be considered as separate criteria to water supply. Improvements may be needed in some locations before additional foul flows can be accommodated. This will prevent deterioration to water quality in receiving rivers.</p> <p>vi. In the case of water supply we suggest the indicator is reworded to include working with Water Companies; and to demonstrate that water demand for new development can be met from the existing capacity within the different supply zones they operate. (We welcome earlier references to Water Resource Management Plans as a key document with regards to water supply/demand).</p> <p>vii. Suggested indicators are:</p> <p>a. volume of water (litres/day) supplied to new development within existing water abstraction licence quantities - <i>to demonstrate sufficient resource is available</i></p> <p>b. volume of water (litres/day) supplied to new development where the Environment Agency have granted a new abstraction licence - <i>to demonstrate the utilities are working with the Environment Agency to manage water resources</i></p>	<p>Cycle Studies will provide evidence to assess policies and sites in relation to this objective and decision making criteria where relevant.</p> <p>v. Consider this unnecessary. Any differences can be covered in the assessment commentary where appropriate.</p> <p>vi. Consider this is already covered in the decision making criteria.</p> <p>vii. Awaiting response from EA</p> <p>viii. Agreed</p>	

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	<p>c. volume of water (litres/day) demanded by new development where the Environment Agency have refused permission for a new abstraction licence - <i>to demonstrate there are no potential showstoppers to future development;</i></p> <p>viii. Pages 87-88 - we suggest an additional decision making criteria in relation to flood risk as follows: Can the development be otherwise located in an area at a lower risk of flooding? – <i>this will demonstrate that development is steered towards areas at low risk and avoid being dependent on the future maintenance of flood defences. A measure of this would be the number of new development of flooding built in the floodplain – already included.</i></p>		
Public Health Lincolnshire County Council	<p>In my view it is the right approach to integrate all assessments into one; and of particular importance to Public Health to include a Health Impact Assessment (HIA).</p> <p>The report highlights a significant number of factors affecting the sustainability of the Local Plan. In addition to the specific section on healthy communities, most other sections are of relevance to the health and wellbeing of residents (green space, poverty, pollution, flood risk, energy use, employment, etc.). The resulting objectives all seem to be sound and it is sensible to have common HIA and Local Plan objectives.</p>	Support for approach and methodology welcomed.	No change
Public Health Lincolnshire County Council	For fuel poverty the new definition makes a distinction between low income households living in energy efficient homes (who meet the definition) and those living in poverty, where households will still be struggling to afford to heat their homes. New development to current building regulations will not result in a household being in fuel poverty as the home will not be energy inefficient.	Comments noted.	No changes.
Public Health	Green (public) space is absolutely the right approach to provide	Comments noted. The	No changes.

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Lincolnshire County Council	opportunities for healthy activities to take place and a 'good feeling'. However, the issue of who takes ownership of the spaces needs to be addressed. Given current public spending cuts, grass cutting is not too frequent and some existing public areas are looking quite untidy; which will make residents feel less good about their place. Perhaps the willingness of communities to achieve local green areas designation could be a factor in the appraisal.	quality of green spaces would be an issue for the plan to address via open space standards.	
Public Health Lincolnshire County Council	In promoting sustainable modes of transport, the document seems a bit light on relating sustainable development to having easy access to public transport; in particular the rail network/ trains.	Objective 13 specifically makes reference to public transport, which includes bus and rail and the baseline data includes information on bus and rail patronage where available. A new decision making question could be added to cover this issue more explicitly.	Add new decision making question under objective 13 as follows: " Will it have easy access to walking, cycling and public transport (bus and rail) routes and services?".
Public Health Lincolnshire County Council	Delivering decent homes and bringing empty homes back into use (making best use of the existing stock) is mentioned but it isn't clear how opportunities to do so and negate the need for new housing are factored into the assessment. In the indicators the percentage of non-decent local authority homes is proposed whereas the greatest number of non-decent homes are owner occupied and the greatest proportion of non-decent homes are private rented.	Comments noted in relation to the indicators.	Indicators have been changes as follows: "Percentage of homes classified as non decent by tenure".
Public Health Lincolnshire County Council	Could numbers of excess seasonal (winter) deaths be a health indicator, relating also to energy?	Agreed.	New indicators added under the health objective as follows: "Excess winter mortality"