

Appendix 1 - Comments from Statutory Consultees on the LJFRDMS SEA Scoping Report

Table 1 - Natural England

Comment	Response
<p>Task A1: Identifying Relevant Policies, Plans and Programmes We advise that the Lincolnshire Biodiversity Action Plan (BAP – 3rd Edition) is added to the list of local policies, plans and programmes in Appendix A of the SEA report. You may also find it useful to add in the green infrastructure studies that have been completed for the Central Lincolnshire Joint Planning Unit and South Kesteven District Council – these documents both contain aspirations that will span across many elements of the SEA.</p>	<p>Included the Lincolnshire BAP and Green Infrastructure studies to the list of policies, plans and programmes in Appendix 3 of the SEA Environmental Report.</p>
<p>Task A2: Collecting Baseline Information We welcome the DCLG criteria (questions) that have been used to critique the baseline data collection.</p>	<p>No Action.</p>
<p>Task A3: Identifying Environmental Issues and Problems Paragraph 6.2.4 (page 15) – we advise that a more explicit reference to the importance of The Wash and Humber Estuary European sites are made in this section. Paragraph 6.4.2 (page 19) – the Humber Estuary SSSI/SPA/SAC and Ramsar is missing from this section and the SEA as a whole. Given that part of the site is located within Lincolnshire, the Joint Flood risk Management and Drainage Strategy (and associated individual projects) have the potential to impact upon the Humber Estuary European site – we therefore advise that is added into this section.</p>	<p>This has been added to the baseline information and forms part of the assessment.</p>
<p>Task A4: Developing the Strategic Environmental Framework At this stage, Natural England is broadly satisfied with the SEA objectives that have clearly been derived from the previous three tasks.</p>	<p>No Action</p>

Table 2 - English Heritage

Comment	Response
<p>Section 6.2 Climate Climate change presents significant challenges for the historic environment, particularly in Lincolnshire, where coastal/ flooding issues will affect heritage assets, historic landscapes and historic settlements such as Boston. It is therefore recommended that there should be a short section on Climate Change and the Historic Environment. English Heritage has produced a number of documents on this topic: http://www.helm.org.uk/server/show/nav.19689</p>	<p>A section detailing the potential impacts of climate change upon heritage assets has been included.</p>

Comment	Response
<p>Section 6.14 Cultural Heritage</p> <p>This section should be updated to reflect the National Planning Policy Framework (NPPF). Although not a development plan, the strategy is closely related to such plans. Thus, the heritage assets should cover those defined in the Glossary of the NPPF. The assessment should consider the concept of harm to the significance of heritage assets set out in paragraphs 132 – 135 of the NPPF.</p> <p>This section is rather limited when compared with the comparable section on biodiversity in terms of the presentation of the numbers of assets and mapping etc. This is disappointing considering the importance of the cultural heritage of the county.</p> <p>We recommend that this section is presented as follows: an overview of the state of the heritage assets (i.e. the national Heritage at Risk register and local surveys); a section on nationally designated heritage assets; and a section on locally important heritage assets, including historic landscapes and undesignated archaeology. It is important to note that there are significant areas of undesignated but nationally important archaeology in Lincolnshire, e.g. in the Witham Valley. Indeed, much important archaeology, including palaeo-environmental remains, is found in waterlogged areas such as the river valleys.</p> <p>Designated heritage assets comprise listed buildings, scheduled monuments, registered battlefields, conservation areas and registered parks and gardens (PAG). There is no reference to PAGs the document; there are 28 PAGs in the county, of which 3 are Grade I and 3 Grade II*. Data on national designations can either be sourced from the county Historic Environment Record and Heritage Lincolnshire, together with data on locally important assets, or from the National Heritage List for England: http://list.english-heritage.org.uk/</p> <p>It is important that the character of historic areas is understood when developing Schemes. Resources include the Lincolnshire Historic Landscape Characterisation, the Lincoln Townscape Assessment (http://www.heritageconnectlincoln.com/) and Conservation Area Appraisals.</p> <p>As well as considering the effects on the historic environment under Objective 9, there may be other areas of the SEA where effects on the historic environment arising from the strategy proposals might be addressed. Paragraph 114 of the PPS 5 Practice Guide indicates that ‘setting’ is not just expressed by reference to visual considerations, but the way we experience a heritage asset may be influenced by other environmental factors such as noise, dust and vibration. There is clearly a close relationship between</p>	<p>The baseline has been updated to include greater detail on the heritage assets that are present within Lincolnshire and their current classification.</p>

Comment	Response
<p>cultural heritage and landscape.</p>	
<p>Section 5.15 Landscape and Visual Amenity There should be recognition in this section of the time-depth of landscapes as reflected in historic landscapes. Again, the Historic Landscape Characterisation should be referred to.</p> <p>The definition of landscape set out in the European Landscape Convention includes urban landscapes. As well as possible impacts on the townscape of conservation areas, the effect of the strategy on other areas of townscape should be considered.</p> <p>Visual impacts are an element of the definition of the setting of heritage assets, although it can include other considerations, as set out in our guidance, such as noise.</p>	<p>The baseline has been amended to reflect the nature of historic landscapes and townscape in Lincolnshire.</p>
<p>Table 7.1 SEA Objectives and Potential Indicators There is an opportunity to update the wording of objective 9 to reflect the changes arising from the publication of PPS5, which has now been largely incorporated into the NPPF. Our suggested wording is: 'conserve and enhance the historic environment, heritage assets and their setting' We have the following comments on the Potential Indicators: Objective 9 Cultural Heritage - The first indicator should include all categories of 'heritage at risk to reflect the national register: http://www.english-heritage.org.uk/caring/heritage-at-risk/ - Number of archaeological sites at risk – do LCC and Heritage Lincolnshire hold data that would allow this to be monitored? - % of sites provided with flood protection measures – again, while it might be possible to gather data on designated sites, and even then, who would do this, it is unlikely that it would be feasible to monitor undesignated sites. Objective 10 Landscape - How does the first indicator referring to the AONB relate to the strategy? - Only World Heritage Sites have defined buffer zones and there are no WHSs in Lincolnshire. Therefore, this indicator should be deleted.</p>	<p>Objectives 9 and 10 have been amended in line with English Heritages recommendations.</p>
<p>Appendix A Relevant Plans, Policies and Programmes Page 4 - 'The Historic Environment: A Force for our Future' was superseded by the 'The Government's Statement on the Historic Environment for England' 2010. However, in the light of the change of government, the status of this document is uncertain. Page 8 – We recommend that the Lincolnshire Historic Landscape Characterisation is also included.</p>	<p>Appendix 3 of the SEA Environmental Report has been updated to include the suggested documents.</p>