

Humber 2100+ SA scoping addendum – summary of consultation responses and changes made

Overview

This summary provides an overview of the responses we received during the Humber 2100+ SA scoping report addendum consultation. It includes key changes we made in response and, in some cases, explains why we did not make changes. Responses are grouped thematically.

The information below does not detail how we responded to every comment, as many of these related to minor issues and corrections. If you would like a copy of a spreadsheet detailing each comment and how we addressed them, please email hstrategy@environment-agency.gov.uk

Key changes made

1. Flood risk/other sources of flooding/strategic partnerships

- Several stakeholders felt the addendum focused too narrowly on tidal flooding.
- Whilst Humber 2100+ is a tidal flood risk management strategy, we added a new section (5.2) on interconnected flood risk and partnerships. This acknowledges that tidal, river, surface water and other sources of flooding interact. It also recognises the important role risk management authorities perform in managing flood risk across the strategy area.
- Yorkshire Water questioned whether scenarios considered ‘retreat’, noting the focus seemed to be based on the ‘protect’ principle. The narratives within the report serve only to describe the impacts of different modelled flood risk baselines and are not future options. As we start to consider how to adapt to future tidal flood risk, we will consider the full range of reasonable alternatives, some of which will acknowledge the potential need to make space for water.
- Future trends now include the potential of outfalls failing to drain due to higher tide levels and the increasing likelihood of consecutive/multi-source flood events.
- In response to a question from Yorkshire Water about the definition of coastal flood risk, we clarified that, for the purpose of this report, ‘tidal flood risk’ is used broadly to cover sea level rise, surges, and high tides.

2. Water Quality, Resources and Climate

- We added a recognition that tidal flooding can worsen bathing water quality, and in doing so, potentially create cascading effects on the local economy, tourism and health.

3. Geomorphology

- Hull City Council provided several comments on this chapter. Whilst many of these were valid points, as many of the comments have already been considered within our detailed ‘Initial Geomorphological Conceptual Understanding’ report, only minor changes were made. This report can be made available - please email hstrategy@environment-agency.gov.uk if you would like a copy.

4. Biodiversity and Nature Conservation

- Lincolnshire Wildlife Trust suggested additional modelling for a dedicated nature-based-solutions (NBS) scenario. Whilst we acknowledge the importance NBS play in FCERM, the flood risk baseline scenarios are not 'options' to be assessed – they only demonstrate that flood risk cannot continue to be managed as it always has been. More work will be needed to assess future options or strategic approaches in the context of NBS.
- The RSPB questioned our evidence which stated there had been no significant losses in intertidal habitat between 1949-2019, requesting access to the underlying studies. No changes to the SA scoping report were made, but we will share these reports with the RSPB for further discussion.
- Several minor, but important, items were added to the report, including:
 - A new section referencing the importance of SPA species, citing habitat-related pressures on the Little Tern colony at Easington as a specific example
 - River and sea lamprey noted as a rare/threatened species
 - Reference to Doncaster's UNESCO Biosphere candidate

5. Agricultural and rural land use

- The farming section has been reworded so that it is more strategic, describing agricultural policy as being in transition rather than being prescriptive about outcomes
- Wording altered to reflect uncertainty and economic viability of future land-management change
- Corrected misunderstanding about LNRS directing agri-environment funding
- Added recognition of increasing solar PV development in the study area and the potential agricultural benefits of sediment

6. Waste management and contaminated land

- Doncaster Metropolitan Borough Council raised concerns that the SA baseline data only accounts for landfill and contaminated land sites, not broader waste management facilities.

To ensure the baseline data was sufficiently strategic and based upon the same data as the previous scoping report, a decision was made not to include all types of waste management facility. The baseline data was agreed by partners through a technical note which informed the scoping baseline.

Whilst we do not intend to include all waste management facilities within the baseline data, we acknowledge that it may be necessary to consider other waste management facilities in more detail in future. This has now been noted within the text.

- Added reference to the LGA Coastal SIG landfill report.

7. Heritage and landscape

- Hull City Council recommended that we carry out more community consultation beyond stakeholder consultation. Although the opportunity to increase consultation at the scoping stage has passed, we recognise the importance of broad engagement. There will be future opportunities for more extensive community consultation in subsequent strategy stages.
- Added a new strategic issue recognising the psychological impacts of heritage loss.
- Minor adjustments to landscape content, including clarification around tidal flooding sometimes being beneficial for sediment supply.
- Updated recreational examples to include King Charles' England Coast Path.

9. Structure, presentation and corrections

- In response to a comment by Natural England, we acknowledged the limitations of addendum format in terms of a vehicle for consultation. Future work will consider both the original scoping report and the addendum when assessing approaches and options against the baseline.
- Made several factual corrections (e.g., East Coast Flyway, visitor numbers at Water's Edge, outdated AONB reference).

10. Future Work

Some consultation responses identified important issues requiring further work beyond the SA scoping stage. For example:

- Several queries from NFU related to future stages (BNG, assessment weighting methodology, ongoing alignment with Natural England's Protected Sites Strategy, agricultural business communication strategy).
- We committed to keeping Yorkshire Water informed on any asset-level concerns as options develop.