

## Appendix 4 – Consultation Responses

Name/ Organisation	Report section	Page number	Comment	Update to the SA Scoping Report
IDBs	1.1	1	Is this a “new” strategy or a comprehensive review of the 2008 one? Wording “New, revised Strategy”, indicates there has been a previous revision following issue of 2008 report. Suggest “revised Strategy” and dropping the word “new” from text.	The Environment Agency confirmed that the document will be referenced as the ‘new strategy’. No change.
	1.2	1	“Background to Strategy” – built upon Planning for the Rising Tides – Climate Change resulting in sea level rise and sustainability/economics of continuing current levels of protection. Climate Change and relative sea level rise is almost absent from this section. Whilst the Strategy is to set out how flood risk can be managed, the reader is pointed toward tidal surge events and flooding from other sources with no real mention of eventual impacts of climate change on rising tides twice a day. I believe awareness should be more apparent.	Noted. Added reference to flooding from sea level rise linked to climate change.
	1.5.2	3	EA is committed to working with its key stakeholders.	Noted
	2.3.1	7	Consultation please include IDBs as Risk Management Authorities under the Flood & Water Management Act 2010 but also Relevant Authorities under the Habitats Regs. Important because any identified flood cells will impact on an IDB’s ability to deliver water level management within its District.	Noted. Comment relates to EA communications team.
	2.4.1	10	“However, the option may have a negative effect in future, if the climate scenario is considered”. The climate scenario must be considered, it was part of the original driver of the Strategy together with economic feasibility of continuing to provide current levels of protection.	Noted. Amended the sentence to clarify that climate change linked sea level rise will pose flood risk in the future for this example.
	3.3.1	15	Isle of Axholme Strategy now being implemented? Document refers to draft	Noted; removed word ‘draft’.

	5.2.4	35	Passive outfalls will be impacted...needs small detail as to what that impact would be e.g. compromising ability to drain land for agriculture and potential impact on third party infrastructure	Noted. Text added.
	5.3.2	36	Physical processes first paragraph. Needs capital letter to start sentence "Present rate of SLR"	Noted. Text amended
	6.1	43	Reference error and page number missing	Noted. Reference error corrected.
	6.6	47	Reference to text in italics referring to EA statutory duties – can't see any italics	Noted. Amended to show italics.
Highways England	6.2/table 5.1	44	Should material assets be widened to include specific high value commercial assets, or will these be adequately covered by the more general SA topic of 'economic growth and economic development'. Examples might be large shopping centres, business parks	Noted. No change. High value commercial assets will be covered under the 'economic growth and economic development' topic.
	6.6/table 6.2	50	Would you want to scale road impact, such as by Annual Average Daily Flow? The option testing would want to reflect that transport networks tend to need all substantial elements of a route to be operational for the route to be operational. Example – M180/A180/ A160 link to docks could all be required for port traffic from Immingham to connect to the M18	Noted. No change. SA will cover impact to strategic transport links.  SA will not attempt to scale road impact directly, instead rely on findings from evidence studies. For example, it will refer to the critical infrastructure study which will be conducted as part of the Strategy.  Comments shared for consideration for the appraisal work outside the SA.
	6.6/table 6.2	50	How are you going to manage the generally high level of most scoring options against those that can be fully monetised such as material asset loss or specific commercial asset loss? These seem somewhat different as they can in principle be fully worked out down to £ per day of loss caused by flooding.  For assets where their loss could be monetised, have you a standardised approach to doing this? Daily loss to the economy? Estimated insurance costs?	Noted. No change. SA will use available evidence studies to support the appraisal.  Comments shared for consideration for the appraisal work outside the SA. Ecosystem Services

		Are you proposing to apply a monetized approach to non-monetised assets such as biodiversity using tools from the economist's toolbox such as Stated Preference valuations?	Valuation (ESV) will be completed for the preferred option(s), which will support the SA.
6.6/table 6.2	50	<p>Do you want to be more specific about the degrees of loss that will occur during a flooding event? Is there a defined flooding event that will be used to standardize the scoring? For example in human terms:</p> <ol style="list-style-type: none"> <li>1. Temporary displacement from home</li> <li>2. Total loss of home</li> <li>3. Home not habitable for an extended period</li> <li>4. Home habitable but without power in summer</li> <li>5. Home habitable but without power in winter</li> <li>6. Home habitable but without ability to travel to work</li> <li>7. Home habitable but without fresh water</li> <li>8. Home habitable but without access to food stores</li> </ol> <p>.. would appear to have different amounts of distress and ability to be coped with for a period.                      Would the impact be scaled according to the number of people affected? I could not see any people related scaling in the table, which seemed curious. Flooding of a small hamlet vs flooding of Hull would appear to be the same in the scoring as far as I can tell, and that does not seem intuitive.</p>	<p>Noted. The SA, for this item, will rely on economics valuation that will be conducted by the Strategy team, using Defra Guidance.</p> <p>Comments shared for consideration for the appraisal work outside the SA.</p>
General		I found myself wondering how you would test and validate the conclusions of the scoring. Have you, for example, a set of sample business cases from past projects you have confidence in that you will run through the scoring and see that the results are coherent with how they appraised in the past?	Noted. SA team has experience conducting appraisal for various Local Authority Local Plans/ Core Strategies etc. Various departments within the EA will also provide information which will aid our scoring method. The appraisal method will be the same but will take into account the context and appropriate evidence studies to inform the appraisal.

	general		Do you have a proposed scoring scale? For example -2 Heavily adverse, -1 slight adverse, 0 neutral, 1 slight positive, 2 heavily positive	No change.
West Lindsey District Council	General		<p>I welcome the opportunity to review the SA Scoping report and would like to continue to receive updates on this study as it progresses.</p> <p>The study is seen as a very important component in shaping future growth in parts of West Lindsey, predominantly in Gainsborough where significant new growth is planned adjacent to the River Trent. This includes the delivery of hundreds of new homes on brownfield land as part of the designated 'Housing Zone' – one of only 20 such designations nationally outside Central London where there are a number of Government-backed initiatives available to accelerate the delivery of new homes. <b>It would be advisable to make reference to this as part of the policy review for this SA, although I have expanded on this below.</b></p> <p>For this reason the Humber Strategy has already been raised in a number of discussions with the EA over the past 18 months (as a result of discussions over the above sites) and it will form a key part of how flood risk is considered for both residential and employment sites that are planned in the study area, particularly those in the vicinity of the tidal section of the River Trent in Gainsborough. This study is therefore expected to be used to directly inform future land uses in this area and, in turn, appropriate methods of mitigation or flood alleviation and environmental enhancement.</p> <p>The report appears to be very comprehensive, and it is clear that the background data considered has been thoroughly researched. Overall the assessment criteria look suitable and I have no further comments in this regard.</p> <p>The plan and policy review appears suitable too and, whilst relatively high-level, includes most of the key considerations</p>	Amended to include LP50, LP40 & LP41 in Appendix 1

			<p>applicable to the WLDC area. <b>The only addition that is advised is with regards to Appendix 1 p.45-47, where it does not appear to show that Policies LP40 and LP41 of the Central Lincolnshire Local Plan have been considered; these cover Gainsborough Riverside developments and the Regeneration of Gainsborough respectively.</b></p> <p>The first of these, LP40 seeks to extend and enhance the existing public realm and public space offer along the full length of the riverside area within Gainsborough, including the enhancement of existing riverside walks and cycle ways. Any future works/options for the River Trent considered in the development of the Humber Strategy should have regard to these policies and explore the opportunities for possible joint working to achieve these policy aspirations, which are a significant part of the ambitious plans to regenerate important riverside sites. We would welcome further discussion on these opportunities in due course.</p> <p>Aside from this I have no further comments at this time but look forward to receiving updates on the progress of this important work.</p>	
Bassetlaw District Council	General		We raise no issue with the content of the proposed Sustainability Appraisal Framework. Our comments largely relate to the accuracy of baseline information contained in the Scoping Report.	Noted.
	3.3.2	16	<p>The Scoping Report should acknowledge the fact that Bassetlaw District Council is an 'over-LEP' authority, whereby it is part of the area covered by the D2N2 LEP, as well as the Sheffield City Region.</p> <p>This LEP also has ambitious economic growth aspirations.</p>	Noted. Text added to section 3.3.2.
	3.3.3	16	The wording of this paragraph gives the impression of confusing saved (pre-Planning and Compulsory Purchase Act 2004) Local Plan policies and current adopted DPD policies.	Noted. Amended text to remove confusion.
	3.3.3	17	Bassetlaw District Council's adopted development plan is the Bassetlaw Core Strategy & Development Management Policies	Noted. Amended text to reflect comments.

			DPD (December 2011). The Council is working on an entirely new, comprehensive Local Plan which will replace the Core Strategy, not simply a review.	
	Q1	18	Neighbourhood Plans are being developed for the parishes of Walkeringham and Misterton, adjoining the northern sections of the Trent within Bassetlaw.	Noted. Added to bullet points & Q1 box.
	4.4.2	26	Selby is not within the Sheffield City Region.	Noted. Text amended.
	Appendix 1	22	The Bassetlaw Landscape Character Assessment (2009) is a background document that informs planning policy (Core Strategy Policy DM9). Although the assessment refers to 'Policy Zones' it is not regarded as a policy document in its own right.	Additional wording added to reflect comment.
North Lincolnshire Council	General comments	General	<p>The Assessment Criteria is thorough, covering a large range of topic areas as is to be expected on such a document covering a very large area. It is noted that the Scoping report is 158 pages and these comments do not address every single page because of time limitations and the coverage of a large number of topic areas.</p> <p>It is clear from the telecom of 9<sup>th</sup> January 2018 with Jenny and some of the partners that comments should concentrate on Assessment Criteria, Plan and Review (Policy) and Topics to be scoped (in and out). It is also clear from this meeting that the nature of a SA is that topics can be scoped in and out throughout its process of running concurrent to the actual formulation of the Comprehensive Review (CR). This is also the case for SA/SEA for Local Plan making. So it is assumed that if a topic area arises that has not been initially covered by the original scoping it can still be addressed appropriately at any given time during the CR?</p> <p>The consideration of how economic growth and financial support to fund flood projects within the HFRMS has always been a bone of contention in terms of addressing how growth and funding can best be applied in terms of individual local authority areas. NLC therefore supports this new approach (as different from the HFRMS 2008) and it is expected that as it states in the paper "clear routes through which LAs, LEPs and other stakeholders with</p>	<p>Noted. This consultation was an opportunity for the stakeholders to raise or suggest changes to the Scoping Report, including topics to scope in or to scope out. There will be opportunities in the future to scope in/ out where this is justified with evidence, for example change in assessment methods or new data.</p> <p>Comments on economic growth and funding 'framework' were shared for consideration for the appraisal work outside the SA.</p>

		<p>economic/growth expertise will provide the growth data/information/analysis/and engagement outputs needed" and NLC supports a paper to be produced on a 'framework' for partner activity on this topic (proposed to be covered in Stage 4 of the process).</p>	
<p>Paragraph 1.2</p>	<p>1</p>	<p>"The Review will update the existing strategy in light of additional information following the 2013 tidal surge, improved understanding about the estuary and its behaviour, and key changes in the way flood risk management is administered and funded."</p> <p>NLC request that although the topic of Managed Realignment is referred to in the Scoping Report there is an absence of a reference to a 'Managed Adaptive Approach (MAA)' and this should be addressed in the Scoping Report. MAA is covered in the February 2016 Planning Flood Guidance and is followed up in DEFRA's own guidance that followed its production. NLC has been in considerable discussion with the EA (Morgan Wray and David Woolley Nottingham office) in terms of potentially applying a MAA to the River Trent. One of the main reasons for extending the boundary of the HFRMS to Gainsborough along the Trent has been because of flood investigation instigated by NLC (in partnership with the EA) in terms of the proposed Lincolnshire Lakes development (6000 dwellings plus infrastructure improvement and community facilities/amenities) west of Scunthorpe along the Trent Valley, but applying a MAA will be a much bigger subject in terms of all the land (including Trentside Villages and agricultural land (mostly of best quality) along the Trent between Gainsborough and the confluence of the Trent with the Humber.</p> <p>In NLC's experience so far with these discussions it is likely that a MAA will have to relate to separate epochs up to the existing planned time for development and flooding of 2115. Also from our discussions it is clear that Catchment Flood Management Plans</p>	<p>Noted. Guidance reviewed. Added reference to the Strategy being flexible due to the changing environment, climate and funding policies and that the decisions for investment in FCERM will be based on trigger points.</p>

		<p>produced by the EA have been at a much higher strategic level and not useful in terms of applying finance in relation to future management and have not been helpful in actually addressing the delivery of the necessary management projects on the ground. It is hoped that in addressing the funding of projects in the CR that more certainty can be given to what projects need to be carried out and how will they be funded – issues that are not covered in Catchment Flood Management Plans.</p>	
	<p>Paragraph 1.2</p>	<p>It is also noted that paragraph 1.2 states that the CR “will also cover a larger study area than the existing strategy: adding the extremity of tidally-dominant flooding further upstream in the Rivers Ouse, Aire, Don and Trent (see Section 1.3).” Paragraph 1.3 explains the latest position on the extended HFRMS boundary and suggests that discussions are “ongoing” as follows:          “At the time of writing, discussions relating to the Strategy’s study area boundary were ongoing, but were indicating that these may be concluded shortly and the confirmed study area boundary will be used to update this Scoping Report with new baseline information after this consultation.”          Paragraph 2.1 under Methodology seems also to doubt that the new boundary amendment is not yet fixed. It states:           “For the purposes of the Scoping Report, it will initially adopt the new Strategy study area (see Section 1.3) comprising the area of tidally-dominant flooding around the Humber Estuary, including the lower reaches of the Rivers Ouse, Aire, Don and Trent.” And concludes:          “Therefore, a review of the SA study area will be undertaken as the parallel studies develop and findings emerge, and modified for later stages of the SA accordingly if impacts are anticipated outside the Strategy study area.”</p> <p>The way these paragraphs read is confusing and is of concern to NLC particularly in reference to the boundary extension along the Trent. Discussions/meetings between the EA and partners in the</p>	<p>Noted. Revised Strategy boundary is being agreed. Sections 1.2 and 1.3 will be updated based on this revision.</p> <p>The SA study area, however, is different to the Strategy boundary as the effects of Strategy intervention on environmental features might go beyond this area. Section 2.1 is worded to reflect this aspect - no change to section 2.1 is proposed.</p>



		<p>past 18 months/2 years have taken place and it is NLC's understanding that the reasons for boundary extension culminating in actual agreement on where the boundary should be extended to along the Trent needs no more discussion. It is hoped that, as explained above in this comment, that the boundary extension along the Trent from Keadby Bridge to Gainsborough has been agreed and accepted by the HFRMS partners! NLC wish confirmation on this point? It is appreciated that the HFRMS CR SA Scoping Document has to get widespread support from its official process, including data to support the extended boundary and, the change of boundary is a significant amendment, but it is understood that many of the partners, including the new LAs, have already assessed the amended boundary and are agreeable to it. A great deal of flood modelling has been carried out by NLC's consultants Mott MacDonald in relation to the Lincolnshire Lakes and the consequences of the assessment of the flood compartment within the Lincolnshire Lakes has proved a consequential link upstream to tidal Trent at Gainsborough (see comment above in relation to a reference to a MAA being required along this part of the Trent). NLC will assist in providing such data should it be requested. It maybe that the words in paragraphs 1.3 and 2.1 have been left in from pre-agreement and not been updated, but for whatever reason NLC request that paragraph 1.3 be updated to reflect the current position of the HFRMS partners in terms of the boundary amendment.</p>	
1.4		<p>Paragraph 1.4 does not make reference to the River Ancholme that enters the Humber at South Ferriby, but it is noted that Figure 1 showing the new HFRMS CR boundary includes a substantial area of the floodplain of the River Ancholme as far inland as where the river rises near Market Rasen. This paragraph makes reference to other main rivers that flow into the Humber, but NLC consider that the River Ancholme is of high significance to the NLC area and the HFRMS. The tidal flood compartments have consequences to land and development at least as far inland as the M180 and the</p>	<p>Reference to the rivers is made in section 1.3 (and not 1.4 as indicated) and has been amended to include reference to the River Ancholme.</p>

		<p>market town of Brigg. The improvement to the A1077 and the tidal defences at South Ferriby between Winteringham Ings and the South Ferriby cliffs is a current project (not started) that is ongoing in terms of investigation by the EA (Mark Adams), NLC and relevant Parish Councils. Flood assessment, so far, has revealed that the flood defences of the Humber and Ancholme benefit land, infrastructure, settlements and development as far inland as stated above. It is clear that the tidal flood compartments of the River Ancholme shown in the HFRMS 2008 are not extensive enough as current evidence shows a greater tidal influence inland. NLC therefore request that reference be made to the River Ancholme in the list of main rivers flowing into the Humber.</p>	
	<p>General/local plan</p>	<p>NLC will provide necessary data as appropriate to the CR as requested but wish to highlight the point of ongoing plans and strategies. Other LAs may be in the same situation as to future planning of growth and development. NLC currently have a planned strategy for growth as reflected in existing Development Plans and associated evidence base that has to be continually updated. Many of these documents can be accessed by referencing the NLC web site. However, a point raised in the telecon was that NLC are currently progressing a New North Lincolnshire Local Plan and the Issues and options stage is likely to be reached by Spring 2018, but the preferred option stage is not programmed until after the Local Elections in May 2019. The programme for the HFRMS CR is to get SoS approval by mid-2019. It will be important to make sure that whatever data is known from the New NLLP (and can be released) and is relevant to the CR process is assessed as appropriate to future growth and development in the NLC area.</p>	<p>Noted. NLC are encouraged to update the EA and provide them with the Local Plan GIS layers, when they are at an appropriate stage to share - and indicate whether they should be treated as 'draft' version.</p>
		<p>It is further emphasised that there are many strategies and plans within LAs that relate to the growth and development agendas that have to be scoped and assessed in any Local Plan process and Local Plan evidence documents tend to be a good source of data, subject to how up to date they will be. As an example of this point</p>	<p>Noted. Comments shared for consideration for the appraisal work outside the SA.</p>

		<p>the telecom discussion mentioned the current Humber Landscape investment Study, Local and National Landscape Character Assessments and Green Infrastructure Strategies. In addition, LAs have economic strategies that don't stand still and LAs have to address the housing issue high up on the Government agenda.</p> <p>It should also be noted that new guidance has been issued in relation to all Local Plans will have to be reviewed every 5 years. All these points will be important in terms of how they may synergise with the HFRMS CR. <b>The flood projects within the HFRMS CR will have to be regularly reviewed in line with any Local Plan Reviews (in line with future political/public choices for growth and development).</b> The Economic Overview paper clearly alludes to these points in the Key Assumptions section, particularly in addition to growth and development being aligned to national policy but that "assumptions will need to be made regarding how future currently undefined growth will be addressed within the Strategy, how often the Strategy will be reviewed and how the outputs of the Review will be incorporated within other strategies within the Humber."</p>	
	<p>Section 2</p>	<p>Whilst it is understood from the methodology listed in section 2 that there will be "long listed options" presented from the big strategic options (after assessment of WFD, River Basin Management etc) and "short listed options" (Local Plan SAs/SEAs, Local Economic Strategies etc) presented after applying the assessment of the long listed options, the "expert judgement" to be applied and converted into a scoring mechanism will be significant to each LA in terms of listing project preferences, including ruling out projects. This issue was raised in the recent SA Scoping telecon and was discussed at a recent Humber Officers Group meeting and NLC understand that there will be SA appraisal workshops arranged in February/March 2018 to progress this issue. The existing criteria for projects should be reviewed plus new ideas leading to a robust system for appraising the scoring so that</p>	<p>Noted.</p>

			all views can be adequately considered. NLC consider this as a crucial issue to be resolved.	
	General conclusion		<p>It is clear that the Strategic Flood Risk Assessment for North and North East Lincolnshire 2011 (joint document - currently going through an update process not involving new flood modelling) will require a comprehensive review after the HFRMS CR has been approved. The new flood modelling in respect of the HFRMS will be substantial and significant to a SFRA Review and NLC request that when that data is available it can be accessed and used for a SFRA comprehensive review as relevant.</p> <p>In conclusion, it is clear that there is still much work to be done and agreement between partners to be achieved. The new economic approach and additional partners in relation to the HFRMS CR boundary changes makes the existing timetable for the completion of the Review very challenging and NLC will assist where relevant and possible to help achieve the current timetable. NLC is currently trying to arrange a date for a EA/NLC liaison meeting (offered by the EA for each LA in the study area) to provide a bespoke update, and to understand local priorities and issues that need to be considered within the HFRMS.</p>	<p>Noted. No change.</p> <p>Comments shared for consideration for the appraisal work outside the SA.</p>
Natural England  *page no from page counter at top of page to account for appendices etc*	Acronyms and abbreviations	9 and throughout the document.	<p>Have you checked that the references to sections of the Habitats Regulations have been amended in line with 2017 updates to the Habitats Regulations?</p> <p>New name: The Conservation of Habitats and Species Regulations 2017.</p>	Noted. Amended.
	1.4.2	18	Ref to Flamborough Head to Gibraltar Point SMP (Wilson 2010), should this be (ScottWilson 2010)?	Noted. Amended.
	3.4	34	<p>Consultation question</p> <p>Q1: Are there any other policies, plans or programmes (PPPs) that contain environmental protection objectives, economic and social objectives or identify issues that are not covered by this PPP review</p>	Reviewed the suggested documents, added to Appendix 1 and added to summary in section 3.2.

		<p>(see full list of reviewed policies in Appendix 1)? Are there any local plans, such as Neighbourhood Plans, that could fall within the study area?</p> <p>NE response: Marine and Coastal Access Act 2009</p> <p>A Green Future: Government’s 25 Year Plan to Improve the Environment.</p> <p>These all need adding into the relevant appendices.</p>	
4.2 Access and recreation	38	<p>England Coastal Path, existing wording:</p> <p>Within the study area, the proposed route runs along part of the estuary edge, starting from Spurn on the north bank to the Humber bridge and on the south bank to Cleethorpes and to the whole of South Humber bank from east to Humber Bridge.</p> <p>Suggested wording:</p> <p><i>Within the study area, the proposed England Coast Path runs mainly along the edge of the estuary, with some inland diversions to avoid operational ports. The stretches encompassing the Humber Estuary start at Easington on the north bank, running westwards to Hessle, across the Humber Bridge and then eastwards along the south bank to Mablethorpe. The path will roll back in response to coastal erosion events or to reflect future changes to the coast due to managed realignment. The England Coast Path is designed to provide access on foot only. The route of the path and any restrictions applied to access will address impacts to the Humber Estuary designated site, alongside any mitigation measures that may be implemented.</i></p>	Noted. Amended.
4.2	38	<p>Humber Landscape and Investment Study (SheilsFlynn 2016?)</p> <p>Change name of consultancy and document and add date (a number places within the document).</p>	No date was available on the report. EA to advice on the date. Publisher is recorded as Cambridge Studios. Reference has been updated to include Sheils Flynn in brackets for ease of identification.

4.2	39	<p>Current text: Development intervention should take a holistic view of access and recreation along with impact on biodiversity as this will be crucial to maintain nature designations in the study area.</p> <p>NE suggest rewording, I'm not sure what is the main point, is it about incorporating access and recreation into new developments or managing the impact of access and recreation on biodiversity?</p>	<p>Noted. Replaced word 'development' with 'Strategy'. The aim is to consider impacts of access, for example dog walking, on biodiversity and that Strategy options be aware of these consequences.</p>
4.2	39	<p>Current text: Local communities may access inter-tidal or coastal areas to undertake traditional activities such as foraging, these may not always be formal access and are often facilitated by the presence of existing flood defences.</p> <p>Access may also be restricted or managed by the presence of flood defences as well as being facilitated, suggest amending the wording.</p>	<p>Noted. No change. The text highlights potential 'informal' use of existing defences by the local population and this may not always be managed or restricted. The point to note is consideration of whether the Strategy option alter these 'informal' practices.</p>
4.2	39	<p>Current text: Access for local communities, formal and informal may interfere with planned intervention, including flood risk management which must be considered in the Strategy and the SA.</p> <p>NE comment: would this be better worded as: Flood risk management measures may impact on formal or informal access to the estuary and this should be considered within the strategy development.</p>	<p>Noted. Text amended.</p>
4.3.3	40	<p>Current text: The England Coast Path, delivered by Natural England to fulfil the Marine and Coastal Access Act, is likely to increase interest in nature tourism. If not managed carefully, ongoing tourism activities combined with potential nature tourism related activities could cause damage to important estuarine habitats and species.</p>	<p>Noted. Amended.</p>

		<p>The Humber Nature Partnership's Humber Recreation Management Plan (Humber Nature Partnership, 2016) draws recreation management zones around the Humber Estuary and emphasises the need to balance tourism economic potential with the impact on the many designated features in the study area.</p> <p>Suggested text:</p> <p>The England Coast Path, delivered by Natural England, will form a National Trail around the coast of England, with the aim of bringing economic and health benefits to both visitors and coastal communities. As nature tourism to the Humber increases, careful management will be utilised- both as a part of the formal coastal access proposals and through partnership working with local stakeholders and local access authorities in order to ensure that important estuarine habitats and species are protected.</p> <p>The Humber Nature Partnership's Humber Recreation Management Plan (Humber Nature Partnership, 2016) proposes recreation management zones around the Humber Estuary and emphasises the need to balance tourism economic potential with the impact on the many designated features in the study area.</p>	
4.5.4	43	<p>Bioeconomy is an evolving concept and the Yorkshire and the Humber region already contributes to 10 % of the country's bioeconomy (BioVale, n.d.).</p> <p>Comment: can you explain what 'bioeconomy' is please?</p>	Noted. Explanation included in the glossary section.
4.6.2	46	<p>Current text:</p> <p>The study area includes areas safeguarded areas for future mineral extraction. East Riding of Yorkshire's geology (salt) is a limited but suitable location to build gas storage caverns to enable underground storage of gas.</p> <p>Text needs amending, currently appears to indicate that the whole of East Riding's geology is salt.</p>	Noted. Text amended.

			E.g. ....East Riding’s salt deposits, once they are mined represent suitable locations for the underground storage of gas.	
5.1.1	47	Current text:  These sites often overlap and are dependent on each other in order to maintain their designations.  Suggest:  Some areas have overlapping designations, including all of the Humber Estuary intertidal and subtidal areas.		Noted. Text amended.
5.1.2	48	Mention wildlife trust nature reserves (and mark on the map in the appendix). Yorkshire, Lincolnshire, Nottinghamshire etc.		Additional text added and local nature conservation sites have been included on the Appendix map (where available from open source and data supplied by Partner Local Planning Authorities).
5.1	48	Important biodiversity also exists outside designated sites such as protected species, farmland bird populations (areas around the Humber are important for the latter).		Additional text added.
5.3.1	52	5.3 Geomorphology  NE advise that geology and soils should be included within this section.  Current text:  The Humber is surrounded by extensive intertidal areas covering approximately 45,500ha of...  Suggest:  The Humber includes extensive intertidal areas....		Elements are included in the context of agricultural land use management, and geomorphological processes. Soil is discussed in the context of 'soil erosion' from agricultural grade land and in the context of contamination, in sections 4.5.2 and 5.7, respectively and they are considered appropriate for a high-level SA. Detailed information, at a local level, will be required to predict the impact of flood risk management intervention on geology or soils. For this reason, Geology and Soils are scoped- out and no change is proposed.



5.3.2	53	<p>Current text:</p> <p>The high concentrations of suspended sediment are derived from a variety of sources, including marine sediments and eroding boulder clay along the Holderness coast.</p> <p>Suggest:</p> <p>The high concentrations of suspended sediment are derived from a variety of sources, but fine sediment eroded from the boulder clay cliffs on the Holderness coast are the most significant.</p>	Noted and amended.
5.3.2	53	<p>Suggest mentioning the movement of the main channels within the estuary in this section.</p>	Noted. Amended text in section 5.3.2.
5.4.1	54	<p>Current wording:</p> <p>The landscape in the study area is characterised by 11 National Character Area (NCA)13 profiles:</p> <p>Suggest:</p> <p>The landscape in the study area is characterised by 11 National Character Areas (NCA)13:</p>	Noted; text amended.
5.4.2	54	<p>Current wording:</p> <p>No other landscape designations are found on the site, but the Lincolnshire Wolds' Area of Outstanding Natural Beauty (AONB), a statutory designation, is immediately south of the study area on account of its high scenic beauty.</p> <p>Suggest:</p> <p>No other landscape designations are found within the study area, but the Lincolnshire Wolds, to the south of the study area, is designated as an Area of Outstanding Natural Beauty (AONB) on account of its high scenic beauty.</p>	Amended.
5.7	58	<p>Q2: Are there any other issues or information related to the topics covered in sections 4 and 5 relevant to the study area? Are there any missing topics to consider?</p>	Noted.

			NE response: all comments set out above.	
Table 5.1	60		<p>Suggest that geology and soils would sit better in the geomorphology section rather than rural land use. Geology strongly linked to geomorphology, so this will be relevant to the strategy (scoped in).</p> <p>Soils can also be affected if significant areas are identified for flood storage (for instance).</p>	<p>Noted. No change.</p> <p>Soils are considered in the context of agricultural land use management and geomorphological process (for example, sedimentation) in the respective sections as well as in the SA Framework.</p>
Table 5.1	60		<p>Landscape change to 'Landscape and visual impacts'</p> <p>Visual impacts: barrier options could have significant impacts on local views, consider scoping in visual impacts.</p>	<p>Noted. Amended 'scoped in' text to include 'local character' that could be significantly affected by flood risk management decisions. This will cover visual impact from options such as the barriers or new, very high defence walls. For those options that propose incremental change, they will be considered less likely to be significant and would be assessed at a detailed level by projects' EIA, therefore scoped out.</p>
			<p>Consultation question</p> <p>Q3. Do the SA objectives provide a reasonable framework through which the likely significant social, economic and environmental effects of the strategy are assessed? Are there any other indicators which are relevant to the strategy?</p> <p>NE response is set out in our comments on table 6.2 below.</p>	<p>Noted.</p>
Table 6.2	From page 63		<p>General comment:</p> <p>Will the option affect...?</p> <p>Needs to be clear whether talking about positive or negative effect otherwise it will be difficult to score.</p> <p>Change to 'Will the option adversely affect...?'</p> <p>Also 'will the option increase or reduce the likelihood..?'</p> <p>Change to 'Will the option increase the likelihood..?'</p>	<p>Noted. No change as the appraisal is intended to take a neutral position and be open to assess both positive and negative effects, and the scoring system enables it to be scored as positive or negative.</p>

	Table 6.2	67	<p>Biodiversity:</p> <p>Current wording:</p> <p>Will the option manage tidal flood risk to prevent deterioration to and/or enhance international and nationally important habitats and species?</p> <p>Suggested wording:</p> <p>Will the option manage tidal flood risk in a way which facilitates enhancement (or prevents deterioration) of international and nationally important habitats and species?</p> <p>Indicators: use the conservation objectives for N2K sites or Favourable Condition Tables in development) for SSSIs. The interest features won't change as a result of delivery of the strategy.</p> <p>Also use these indicators for the criteria related to climate change resilience.</p>	Noted. Amended wording.
	Table 6.2	67	<p>Biodiversity:</p> <p>Current wording:</p> <p>Will the option manage tidal flood risk and/or enhance regional or locally important habitats and species (such as BAP)?</p> <p>Suggested wording:</p> <p>Will the option manage tidal flood risk in a way which enhances regional or locally important habitats and species (such as BAP)?</p>	Noted. Amended wording.
	Table 6.2	68	Geomorphology	Amended objective using this wording.

			<p>Current wording:</p> <p>To manage or improve estuarine geomorphological processes.</p> <p>Clarify the objective, suggested wording:</p> <p>To facilitate natural estuarine geomorphological processes.</p> <p>Indicators: monitor erosion, deposition and channel movements.</p>	Revised the indicator to reflect suggested change.
Table 6.2	69	<p>Landscape character:</p> <p>Current objective:</p> <p>To retain key features of the landscape character.</p> <p>Suggested criteria:</p> <p>To maintain and enhance the landscape character.</p> <p>Current criteria:</p> <p>Will the option manage tidal flood risks to the landscape character of the area and/or contribute to maintain or enhance the landscape character?</p> <p>Suggested criteria:</p> <p>Will the option maintain or enhance the landscape character?</p> <p>Indicators: landscape character descriptions won't indicate changes to landscape.</p> <p>Delivery of NCA opportunities could be used as an indicator.</p>	<p>Noted. Text amended in Table 6.2.</p> <p>Noted. Amended the indicators.</p>	
Table 6.2	70	<p>Climate change:</p> <p>Current criteria:</p> <p>Will the option allow sufficient time adaptation/ relocation of utilities/ critical infrastructure, for example water treatment plants or wastewater treatment plants?</p>	Noted. Amended text as per suggestion.	

		<p>Is this about allowing time or about providing clear information so that infrastructure businesses can make their own decisions? This will include timescales, but also water depths etc. Also applies to other criteria related to communities and businesses.</p> <p>Suggested wording:</p> <p>Will the option provide sufficient information (including timescales) to allow infrastructure to be relocated or adapted to climate change?</p>	
		<p>Consultation questions</p> <p>Q4 Are there any other potential conflicts between the proposed SA objectives and the Strategy objectives that have not been identified in the compatibility assessment?</p> <p>How could potential conflicts be addressed?</p> <p>NE response:</p> <p>Strategy objective 3: difficult to assessment compatibility with SA objectives, is the priority aligning with economic growth programmes or delivering the most sustainable approach to flood risk?</p>	Noted. No change.
7.2	74	<p>Summary Questions for Consultees</p> <p>Not sure that all these questions are present within the document, are they supposed to be?</p>	The questions duplicate those that appear at the end of each section - for ease of reference to the reader.
Fig 9	135	<p>Existing and proposed mineral sites:</p> <p>East Riding data missing.</p>	Data received from East Riding Yorkshire, and updated maps accordingly.
Fig11	137	<p>Figure shows 'non-designated sites'. Suggest 'other nature conservation sites.' Most NNR's are also designated sites so not accurate to say that they area 'non-designated'.</p> <p>What about local wildlife sites in East Riding?</p>	<p>Noted.</p> <p>Requested 'local' wildlife sites as well as those identified by charities such as Wildlife Trust from all relevant local authorities.</p>

			Are wildlife trust nature reserves marked on? Doesn't seem to be much in YWT area.	
	Fig 14	140	Figure shows National Character Areas not Landscape Character Areas.  AONB stands for Area of Outstanding Natural Beauty (key needs correcting)	Noted. Map amended.
North East Lincolnshire Council	6.2	44	Biodiversity – Recognition needs to be made of the habitat mitigation sites being delivered across the South Humber Bank. These sites provide appropriate mitigation for roosting SPA birds to enable to development of employment sites. In North East Lincolnshire these sites cover a combined area of circa 128ha. A number of these sites are located in fields which are positioned adjacent to the existing flood defences. The wording of NPPF para 118 should be noted which emphasizes sites identified, or required, as compensatory measures for adverse effects on European sites, ...should be given the same protection as European Sites Detail of the sites and further background info can be found under local plan policy 6 Habitat Mitigation – South Humber Bank	Noted. Request for data from planning authorities made in February 2018 and all data set responses that were received has been used to update this section and Appendix 2 Map 11.
	Appendix 1.1 Local Plans	1.28	Based upon the published mods to the local plan  Policy 1 will be deleted  Policy 6 Habitat Mitigation South Humber Bank should be included	Noted.
Humber LEP			I suppose the main comment is that the importance of the 'Energy Estuary' idea for the future of the Humber economy is somewhat underrepresented. Elements like the offshore wind sector anchor that economic opportunity to this geography and as such the ability to maximise this economic opportunity is dependent on the ability to provide sites which will have reduced flooding risk.  This is a key element which will come out of our nascent Humber Industrial Strategy.	Noted. Text added in section 4.3.1

			Another point is really around making sure expansion of existing indigenous companies is facilitated and considered within the Sustainability Appraisal Framework.	Noted. Amended text in the SA Framework.
	4.3	23	I would be minded to reword the first section "The key economic sectors in the Humber can be classified as Manufacturing, shipping and logistics, energy production and agriculture and fisheries. "	Noted. Amended text.
	4.3.2	24	I would note that although GVA continues to lag behind national levels, the most up to date information covering 2016 is beginning to suggest that this gap is closing between the Humber and the rest of England.	Noted. Text amended.
	4.5.4.	27	"...contributes to 10% of the country;s bioeconomy (Bio Vale n.d.) including large scale industrial processes such as the production of biofuel at Vivergo Fuels at Saltend. "	Noted. Text amended.
	4.5.4.	28	1 <sup>st</sup> bullet – yes but it is very much down to government commitment to biofuels – not a given at this point in time!	Noted. Amended text to reflect the comment.
	4.6.1	29	Transport – Goole also provides a key interface between rail, road, the Humber Estuary and the inland water way network west to Leeds. The Goole Intermodel Project which has received LEP endorsement will help to facilitate a greater use of inland waterway.	Noted. Text added
	4.6.1	29	Hospitals, Power Stations, utilities – Humber is the landing area for a large amount of offshore wind.	Noted. Text added to state that offshore wind energy (power stations) to suggest this may form part of critical infrastructure.
	6.6	49	Criteria – Will the option have an impact on inward investment and large scale indigenous business growth in the study area?	Noted. Text added. Comments shared for consideration for the appraisal work outside the SA.
North Yorkshire County Council	General	n/a	In general, the approach to the SA outlined in the scoping report appears sensible and logical and in accordance with best practice. However, it would also be useful to consider the content of the recently updated RTPi SEA guidance. <a href="http://www.rtpi.org.uk/knowledge/practice/sea/">http://www.rtpi.org.uk/knowledge/practice/sea/</a>	Noted.

Section 2.4	9 - 10	The proposed aspects and descriptors in table 2 are appropriate. However, it would be advisable to consider an expansion of the significance rating to provide 3 rating scales i.e. minor moderate and major significance rather than the two proposed in table 3. This would provide greater scope for differentiating between the merits of possible options at later SA stages. However, it is possible to make such changes at a later stage in the SA process should it be determined to be necessary.	Noted. No change as the five-scale rating has been tested and used in many Local Plan SAs and FRMS SA/SEAs. Team to consider using a Red, Amber, Green (RAG) coding.
Section 2.4.2	10	The proposed approach in section is acceptable but subject to the effectiveness of its implementation at the preferred option stage.	Noted.
Section 2.6	11	It is advisable to consult with the Marine Management Organisation (MMO) on the Strategy Review and supporting document given the functions for marine plan production and marine licensing (below Mean High Water Springs (MHWS)).	Noted. Comments shared for consideration for the appraisal work outside the SA.
Section 2.8.1 and section 3	12 and 13	The Conservation (Natural Habitats &c.) (Amendment) (England) Regulations 2000 should be replaced by the Conservation of Habitats and Species Regulations 2017.	Amended.
Section 3 and Appendix 1		<p>Please see below the proposed updates / amendments required to plans or projects already identified, and additional plans / projects not already identified in the scoping document:</p> <ul style="list-style-type: none"> <li>- The latest version of the YNYER LEP's SEP is the <a href="#">2016 Update</a>. It is also worth noting that the LEP has commenced work on developing an Energy Strategy – this is still at an early stage, but it could be relevant to the Humber Strategy study area. This may also be relevant to Section 4.4.2</li> <li>- Local Authority Plans should include the North Yorkshire, City of York Council and North York Moors National Park <a href="#">Minerals and Waste Joint Plan</a>. It is noted that this Plan is captured in Appendix 1. The Joint Plan was submitted to the Planning Inspectorate for examination in Nov 2017, with the examination scheduled to be conducted Feb / Mar 2018</li> </ul>	Amended YNYER LEP SEP date.



		<ul style="list-style-type: none"> <li>- NYCC is the Lead Local Flood Authority for the County. Relevant documents that have prepared appear to have been omitted, including the North Yorkshire Local Flood Risk Strategy and NYCC SUDS Design Guidance. This may also be relevant to Section 1.4.2</li> <li>- NYCC Council Plan needs updating to the 2017-2021</li> <li>- There are a number of other NYCC documents that could be included including Key Strategies, Plan and Policies. The Plan for Economic Growth 2017, Joint Health and Wellbeing Strategy 2015 – 2022, Local Transport Plan LTP 4, Municipal Waste Management Strategy 2006 - 2026 are likely to be of particular relevance. NYCC has also developed a Strategic Transport Prospectus (this could be relevant to Section 4.6.1)</li> <li>- Consider including recently published Government Strategies including the Industrial Strategy, Clean Growth Strategy, and the Defra 25 year Environment Plan</li> <li>- Consider including Marine Strategy Framework Directive</li> <li>- Consider including the OSPAR Convention (Convention for the Protection of the Marine Environment of the North-East Atlantic) particularly with regards to management and possible disposal of marine and estuarine sediments</li> <li>- Consider recent and future leasing rounds including BEIS Offshore Strategic Environmental Assessment 3 for offshore energy and 14th Onshore Oil and Gas Licensing Round which links to strategic economic growth and investment</li> </ul>	
Section 4.4.2	26	The SA states that the Selby is situated within the Sheffield Region Local Enterprise Partnership (LEP) area. We are however of the opinion that Selby District is within the Leeds City Region LEP and North Yorks & East Riding LEP areas.	Noted. Amended text.
Section 5		There should be an inclusion and consideration of Sites of Importance for Nature Conservation (SINCs). The Holderness inshore Marine Conservation Zones should also be considered at	Amended SINCs and included MCZs on the maps.

		least in the first instance and ensure that tranche 3 of MCZs designations are appraised during the review process.	
Section 5		It is advisable consider compensatory habitat within the plan area which has been identified through previous regulatory decisions (e.g. the Secretary of State’s decision to grant deployment consent for Able Marine Park). It is noted that this would need to be considered in more detail as part of the HRA process.	Noted. See response to Natural England on updating the text and requesting this data from planning authorities.
Table 6.2	51 and 52	SA Objective 6 – this should also include the requirement to increase connectivity between sites.  SA objective 8 – it is not clear what is meant management or improvement of geomorphological processes e.g. what does an improvement of geomorphology look like? This is not clearly set out within the scoping document.	Noted. This will be covered by the wording ‘ecological corridor’.  Noted. See response to Natural England on revising this objective
Table 6.2		The effectiveness of the monitoring needs to be considered further and potentially revised through the plan / SA process. It is important that the effectiveness of the indicators used to monitor the strategy so far are considered when determining future indicators and monitoring approaches. The new DEFRA 25 Year Environment Plan and the Natural Capital approach should be considered.  This comments on the indicators include: <ul style="list-style-type: none"> <li>- SA objective 1 - how is risk to life measured? The standards of protection and the number of proprietries (perhaps including businesses) within the functional floodplain may be a better measure.</li> <li>- SA objective 2 – alteration of the lengths of footpaths might be unrelated to the implementation of the plan but due to other external factors. It also doesn’t consider the value including (importance/ quality / usage) of paths, recreational amenities etc.</li> <li>- SA objective 3 – New Business Formation Rates is potentially difficult to attribute directly to the strategy. Is it intended that</li> </ul>	Noted.  Comments shared for consideration for the appraisal work outside the SA.

			<p>this will focus on new businesses in areas newly protected as a result of measures from direct implementation of the strategy?</p> <ul style="list-style-type: none"> <li>- SA objective 3 and 4 – no. days of agricultural land flooded might need to be reconsidered in light of emerging proposals for replacing the Common Agricultural Policy after Brexit, whereby landowners including farmers are paid for providing public services including Natural Flood Management and reconnecting watercourses to floodplains.</li> </ul>	
	6.7.3	56	<p>It is agreed that there is no conflict between the objective and SA objectives. However, there are some areas where there is a connection which wasn't been identified including:</p> <ul style="list-style-type: none"> <li>- Strategy Objective 1. &amp; SA Objective 5 – the flood risk management and supported operations and maintenance of assets are linked but compatible. This is the same with SA Objective 8</li> <li>- Strategy Objective 5. &amp; SA Objective 6 - conservation and enhancement of biodiversity and the adherence to principles of sustainable development is also linked to economic growth (but compatible)</li> <li>- Strategy Objective 8. &amp; SA Objective 1- reviewing the strategy following significant flooding events is linked to managing risks of flooding / human health. Similarly SA Objective 11 is linked and compatible with climate change.</li> </ul>	Noted. Text added to section 6.7.3.
East Riding of Yorkshire Council	Whole document	Whole document	As this report will be the first of many published documents, and given that branding has been produced and shown at the OG, we suggest badging up the report from the HSCR group. At present this is a generic Environment Agency report.	The branding will be approved in time for formatting the post-consultation version.
	Whole document	Whole document	The document as a whole requires proof-reading for spelling, grammar and formatting. In particular, page numbers restart after Figure 1.	Noted.

	<p>Whole document</p>	<p>Whole document</p>	<p>The NPPF, paragraph 6, states that ‘The purpose of the planning system is to contribute to the achievement of sustainable development’. Paragraph 7 states that ‘There are 3 dimensions to sustainable development: economic, social and environmental.’ Therefore all of the policies in the East Riding Local Plan relate to environmental protection, the economy and/or social objectives, not just those listed. All policies in the East Riding Local Plan that are applicable to the study area should be listed, including allocations. The key policies from the Strategy document that have been omitted include:</p> <ul style="list-style-type: none"> <li>• Policy S1: Presumption in favour of sustainable development</li> <li>• Policy S2: Addressing Climate Change</li> <li>• Policy S3: Focusing Development</li> <li>• Policy S4: Supporting Development in Villages and the Countryside</li> <li>• Policy S5: Delivering Housing Development</li> <li>• Policy S6: Delivering Employment Land (policy is already included but the reasons for inclusion should be expanded. It sets out how the future needs of the economy will be met though the allocation of employment land across the East Riding.)</li> <li>• Policy EC1: Supporting the Growth and Diversification of the East Riding Economy</li> <li>• Policy EC2: Developing and Diversifying the Visitor Economy</li> <li>• Policy EC4: Enhancing Sustainable Transport</li> <li>• Policy C1: Providing Infrastructure and Facilities</li> <li>• Policy C2: Supporting Community Services and Facilities</li> <li>• Policy C3: Providing Public Open Space for Recreation and Leisure</li> <li>• Policy A1: Beverley and Central Sub-area</li> <li>• Policy A4: Goole &amp; Humberhead Levels Sub Area</li> <li>• Policy A5: Holderness &amp; Coastal Sub Area</li> </ul> <p>As mentioned above these are the key missing policies but all Local Plan Policies are relevant to some degree. There seems to be</p>	<p>Noted. New text added in Appendix 1. Note that themes covered under Policy S1 and S2 are integral to the SA and the Strategy’s vision and objectives and are repetitive themes across all partner authorities, they have not been reviewed. Similarly, policies on sustainable transport, provision of infrastructure facilities, supporting community services, provision of public spaces are unlikely to directly impact or be impacted by the Strategy. Therefore, they have not been reviewed but the themes are relevant to the SA and have been included in the SA Framework.</p>
--	-----------------------	-----------------------	---	---

		<p>no consistency between what documents and policies are referred to for each Local Authority. For some local authorities Local Plan policies covering a wide range of topics/ objectives are included. For others, such as East Riding of Yorkshire Council, the list of policies is very narrow. Some consistency should be provided to ensure similar policies from all local authorities are considered.</p> <p>In addition, in the East Riding section none of the Local Plan evidence base has been referred to; the Strategic Flood Risk Assessment, Landscape Character Assessment, Infrastructure Study etc are not considered. These documents are referred to for other areas. It is reasonable that these could be relevant to the preparation of the Humber Strategy. The Local Plan evidence base is available at <a href="http://www2.eastriding.gov.uk/environment/planning-and-building-control/east-riding-local-plan/evidence-base/">http://www2.eastriding.gov.uk/environment/planning-and-building-control/east-riding-local-plan/evidence-base/</a>.</p> <p>The Council has also produced a number of flood risk strategies that are available at <a href="http://www2.eastriding.gov.uk/council/plans-and-policies/other-plans-and-policies-information/flood-risk/flood-risk-strategy/">http://www2.eastriding.gov.uk/council/plans-and-policies/other-plans-and-policies-information/flood-risk/flood-risk-strategy/</a>.</p>	
Glossary	VII	Make clear what the HESMP is and that it has been superseded by the Flamborough Head to Gibraltar Point Shoreline Management Plan (which should also be included in the glossary) and the HFRMS.	Amended.
Glossary	X	These are out of alphabetical order.	Amended.
1.2 Background to the Strategy	1	<p>No mention of the Humber Local Authorities bid to central government and the Defra response which was one of the main drivers for the HSCR. We suggest amending the text used in the Memorandum of Understanding (Section 2) for inclusion in this.</p> <p>The <i>Flood Defences Cost Money, No Flood Defences Cost More: An economic case for the Humber and United Kingdom</i> report should also be referenced in Section 3.</p>	Noted. New text added in Section 3.

			<a href="http://www2.eastriding.gov.uk/council/plans-and-policies/other-plans-and-policies-information/flood-risk/flood-risk-strategy/">http://www2.eastriding.gov.uk/council/plans-and-policies/other-plans-and-policies-information/flood-risk/flood-risk-strategy/</a>	
3.3.1 Flood & Coastal Erosion Risk Management Plans	14		The Humber Estuary SMP and Flamborough Head to Gibraltar Point SMP should be included separately, with a fuller explanation of the impact of the Flamborough Head to Gibraltar Point SMP on the HFRMS.	Noted. Section 3.3.1 edited.
Other Flood Risk Management Plans	15		The River Hull Integrated Catchment Strategy should be reviewed alongside these other documents.	Amended.
3.4 Key Messages	17		5 <sup>th</sup> bullet point: Masterplans can be prepared outside Area Action Plans. The East Riding Local Plan identifies a number of allocations where masterplans will be prepared as supplementary planning documents.  Supplementary planning documents should also be considered when preparing the Strategy/ SA. The Council's SPDs are available at <a href="http://www.eastriding.gov.uk/spd">www.eastriding.gov.uk/spd</a> .	Noted. As there are many SPDs and Neighbourhood plans developed by the Partner Local Authorities, it was considered appropriate to defer reference to these plans till site specific intervention is considered in the Strategy (potentially at the short-listing stage). However, allocations proposed in the Local Plan have been taken into account and represented in Appendix 2-6. No change to text proposed.
Consultation Question 1	18		No mention of ERYC's Local Flood Risk Management Strategy, 2015- 2027. Only Doncaster's included in the Appendix, so other LLFA's will also need to be included. Given that all RMAs must have regard to these statutory documents and their objectives and measures, they must be included. Find at link to ERYC's below:  <a href="http://www2.eastriding.gov.uk/council/plans-and-policies/other-plans-and-policies-information/flood-risk/local-flood-risk-management-strategy/">http://www2.eastriding.gov.uk/council/plans-and-policies/other-plans-and-policies-information/flood-risk/local-flood-risk-management-strategy/</a>  Also consider Local Authority produced surface water and integrated studies. In ERYC's case the <i>Hull and Haltemprice (within the East Riding of Yorkshire) Flood Risk Management Plan (FRMP) 2015-2021</i> is a statutory requirement under the Flood Risk	Noted. Added to Q1 box.

			Regulations 2009. Whilst it is major on surface water ERYC's plan considers wider integrated sources including tidal risk.	
	Consultation Question 1	18	The Humber Management Scheme and Action Plan should be reviewed for environmental protection objectives.	Noted. Added to Q1 box.
	Consultation Question 1	18	The document does not refer to the East Riding of Yorkshire Rural Strategy (2016-2020). This is an East Riding of Yorkshire Council led and adopted Strategy. The Rural Strategy is cross cutting and is jointly developed and delivered with the East Riding of Yorkshire Rural Partnership. The Rural Strategy and Rural partnership present an avenue for this high level Flood Risk Management Strategy to engage with a wide range of rural interests at a catchment/local level.	Noted. Text added to Appendix 1.
	Consultation Question 1	18	Relevant adopted neighbourhood plans in the East Riding include Cottingham Neighbourhood Plan.  There are also a number of Neighbourhood Plans in the East Riding that are under development. Neighbourhood Areas, the first stage in preparing a Neighbourhood Plan, have been set up in Barmby Moor, Allerthorpe, Hayton and Burnby, Howden, Market Weighton, North Cave, Pocklington, Skidby, Sutton Uppon Derwent, Wawne and Woodmansey. The town and parish councils are at various stages of preparing their plans. Some of these may be relevant to the Strategy/SA.	Inclusion of Neighbourhood Plans will be considered when modelling/ intervention details are made available, potentially at short list stage.
	4.4 Economic Growth and Inward Investment	25	The importance of the East/West multi-modal corridor, identified in the East Riding Local Plan, should be acknowledged for the economy and transport.	Noted.  Comments shared for consideration for the appraisal work outside the SA.
	4.4.2 Strategic Economic Partnerships	25	Goole is also a location for regeneration. Please see links to Goole Renaissance partnership, <a href="http://www2.eastriding.gov.uk/council/working-with-our-partners/regeneration-and-renaissance-partnerships/goole/">http://www2.eastriding.gov.uk/council/working-with-our-partners/regeneration-and-renaissance-partnerships/goole/</a> .	Noted. Added text.

<p>4.6.2 Mineral Sites</p>	<p>29</p>	<p>The name of the Joint Minerals Plan For Kingston Upon Hull &amp; East Riding of Yorkshire (2004) should be amended to reflect the correct name, as set out in this sentence.</p> <p>The Plan was prepared by Hull City Council and East Riding of Yorkshire Council. This should also be corrected.</p> <p>The new Joint Mineral Plan is expected to be adopted in late 2018 not 2017. The Council's Local Development Scheme, which sets out the proposed timetable, is available at <a href="http://www2.eastriding.gov.uk/environment/planning-and-building-control/east-riding-local-plan/local-development-scheme/">http://www2.eastriding.gov.uk/environment/planning-and-building-control/east-riding-local-plan/local-development-scheme/</a></p>	<p>Amended.</p>
<p>5.1.1 Statutory designated features</p>	<p>31</p>	<p>The river profile is one of the features of the River Derwent SSSI &amp; SAC. The Lower Derwent Valley is designated as an SAC for its floodplain meadows and as an SPA for its assemblage of breeding and wintering birds.</p>	<p>Additional text added.</p>
<p>5.2.1 Non-statutory designated features</p>	<p>32</p>	<p>The RSPB reserves are all part of the statutory designated features of the Humber SPA/SAC/SSSIs.</p> <p>The managed realignment sites were created under the Habitats Regs to compensate for impacts upon the statutory designations (SAC/SPA). Although they are not currently designated as statutory sites they receive the same level of protection under the Habitats Regs.</p> <p>There is no reference to priority habitats (of principal importance for the conservation of biodiversity)</p> <p>Although community involvement may be high on some non-statutory sites, some non-statutory sites are in private ownership with no community involvement.</p>	<p>Noted.</p> <p>GIS data was requested from partner councils on the habitat creation and managed realignment sites. Datasets received from the respondents (both prior to and after the SA Scoping report consultation) have been used to update Appendix 2 Map 11.</p>
<p>5.4.1 Landscape Character</p>	<p>37</p>	<p>East Riding of Yorkshire Council is in the process of preparing a new Landscape Character Assessment (LCA). It is likely that the new LCA will be published and available to support the development of the new Humber Strategy.</p>	<p>New text added.</p>



5.6 Climate Change	41	There is no mention of the work carried out by the Committee on Climate Change. They have carried out a number of 'Climate Change Risk Assessments' (CCRA) over the years and provided a number of reports to the Government; flooding is identified as a key risk. The CCRA should be included as a relevant document.	Noted. New text added.
5.7 Waste and contaminated land	42	The East Riding of Yorkshire Contaminated Land Inspection Strategy 2013-2018 could be reviewed alongside other documents	Noted. New text added.
4.5 Rural land use and rural economy	42	The future trend of land use and farming policy post Brexit is not fully explored. There could be major opportunities to more closely link future farm support to ecosystem services. The "menu" of stewardship options for farmers needs to be locally tailored to local needs at a landscape/catchment scale. There needs to be a mechanism to enable local stakeholders to influence how these options are developed.	Noted. The Environment Agency's position regarding this Strategy and Brexit is stated in Section 3.1.
6.2 / Table 5.1 Summary of issues scoped in and out...	43-45	The text relating to why some issues have been scoped out needs to be made consistent, where the reason for scoping out the issues are the same.	Noted. Text amended.
6.2 / Table 5.1 Summary of issues scoped in and out...	44	In the biodiversity section protected, rare and notable species are scoped out, but high level commentary on species is included in Priority habitats which are scoped in. This is potentially confusing and it would be clearer for the Priority habitats not to include species.	Noted. Priority habitats will be included but not species in the SA Framework (hence now scoped out). Species description in section 5.1 will remain unchanged as this information helps set the scene and will help the reader appreciate the issues in the study area.
6.6 The SA Framework	47-54	In general, the framework is thorough on environmental factors but limited on economic factors.	Noted.
6.6 The SA Framework	47	Topic 1: It is suggested that future housing developments is defined. Does it mean land allocated for housing use in a Local Plan plus land with extant planning permission?	Noted.

				It is the land allocated for housing as identified in the Local Plan (SA will use GIS layer supplied by the Local Authority).
6.6 The SA Framework	47	Topic 2: The Strategy/SA should consider the impact on the built character of the area, as well as the landscape character and impact on historic environment. Built character could be considered under place and communities.		Noted. No change. Built character will be covered as part of landscape character (which encompasses natural and man-made landscape).
6.6 The SA Framework	47-48	Topic 2: Additional indicators need to be developed to reflect the diversity of criteria within this topic.		Noted. These will be developed as SA and the Strategy progresses. Any suggestions to include indicators are welcome.
6.6 The SA Framework	49	Topic 3: It is suggested that proposed employment land is defined. Is it land allocated in a Local Plan plus land with extant planning permission?		Noted. It is the land allocated for employment as identified in the Local Plan (SA will use GIS layer supplied by the Local Authority).
6.6 The SA Framework	49	Topic 4: This section should include land uses other than agriculture (e.g. Nature tourism, water storage, etc.).		Noted. Urban land-use (and potential effects of options relating to water/ flood storage) will be covered in topics 1, 2 and 3. Topic 4 will cover rural land-use and the biodiversity topics will cover effects on natural features (including wetlands). Nature tourism is an activity, and the land-use that is linked to this activity will be covered by the land-use discussed above, hence no change is proposed.
6.6 / Table 6.2 SA Framework / 6. Biodiversity	51	The second criteria <i>Will the option manage tidal flood risk and/or enhance regional or locally important habitats and species (such as BAP) has potential indicators / monitoring information BAP objectives and targets, Habitats supporting protected species populations, wildlife corridors</i> BAP has not been referenced earlier in the Baseline section 5. The UK BAP and its targets are no longer supported by Government although habitats and species of <i>principal importance for the conservation of biodiversity</i> are listed in section 41 of the NERC		BAP was mentioned under section 5.1.2. However, reference to BAP has been deleted and replaced with reference to specific section of the NERC Act.

		<p>Act. <i>Habitats supporting protected species</i> is open to confusion, how is this defined? Is it the habitats or the species which are being monitored?</p> <p>Protected species have been scoped out in Section 6.2.</p> <p>Wildlife corridors should not be used as Potential Indicators / monitoring information as these have not been spatially defined or evaluated and are not referenced in relevant earlier section e.g. 5.1.2 Non-statutory designated features.</p>	<p>Noted. Reference to 'species' has been removed from the criterion against the biodiversity objective (Topic 6).</p> <p>Noted. Removed reference to wildlife corridors.</p>
Appendix 1	7	The Flamborough Head to Gibraltar Point Shoreline Management Plan should be included as a relevant sub-regional document.	Noted. A brief summary is presented in section 3.3.1 and added in Appendix 1.
Appendix 1 – Draft River Hull Integrated Catchment Strategy	12	<p>Remove 'Draft' from River Hull Integrated Catchment Strategy.</p> <p>Suggest addition to first sentence, "Agreed locally, this study provides..."</p>	Noted. Text amended.
Appendix 1 – Hull City Council Local Planning Documents	17-18	Hull and Humber Ports City Region Development Programme II is not only relevant to Hull.	Noted.
Appendix 1 – East Riding of Yorkshire Council Local Planning Documents	18-20	<p>Please identify the policies from the East Riding Local Plan correctly e.g.</p> <p>East Riding of Yorkshire Council, <i>East Riding Local Plan Strategy Document</i>, Policy S4: Supporting development in Villages and the Countryside (<i>new proposed text</i>)</p>	Noted. Text amended in Appendix 1.
Appendix 1 – East Riding of Yorkshire Council Local	18	A number of the policies in the Allocations Document identify how the risk of flooding should be mitigated on development sites.	Noted.

	Planning Documents - East Riding Local Plan Allocations Document		The Humber Strategy should ensure that it does not increase flood risk or impede the delivery of development on allocated in the Local Plan.	
	Appendix 1 - East Riding of Yorkshire Council Local Planning Documents	19	<p>Draft Joint Minerals Development Plan Document - East Riding of Yorkshire and Kingston upon Hull- Summer 2010 Consultation version is listed under East Riding of Yorkshire Council documents. The Joint Minerals Local Plan should be listed as a joint plan.</p> <p>The most recent consultation took place in summer 2016 not 2010. The consultation document was called East Riding of Yorkshire and Kingston Upon Hull Joint Minerals Local Plan Second Preferred Approach (2016).</p> <p>Please note the publication version will be made available in Spring 2018. Adoption is expected later this year.</p>	Noted. Text amended in Appendix 1.
	Appendix 2 – Figure 6	6	Given the scale of figure 6 it is difficult to tell whether all Local Plan allocations in the East Riding have been included. However, the larger allocations have been included.	Noted. A zoomed in version will be provided to Jeremy Pickles for review (February 2018).
	Appendix 3 – Local Landscape Character	23	East Riding of Yorkshire Council is in the process of preparing a new Landscape Character Assessment (LCA). It is likely that the new LCA will be published and available to support the development of the new Humber Strategy.	Noted.
RSPB	2.4.1	10	<p>Re Table 3 – Criteria to determine significance of identified effects of strategy options against SA objectives: Where the significance is assessed as <i>'minor negative'</i> the table concludes that <i>'This effect would not be considered significant'</i>.</p> <p>This wording used here is of potential concern, as something considered to be of <i>'minor negative'</i> at the strategic level assessment of SEA/SA but which <i>'partly undermines achievement of the SA objective by contributing to a social, economic or</i></p>	<p>Noted.</p> <p>The options will be appraised against each objective and will be viewed in the context of the specific objective that is being considered. Where a cumulative, synergistic or secondary effect is likely to occur (as indicated in the concern raised) this item will be picked up as part of the in-combination effect appraisal. Although the SA is a</p>

		<p><i>environmental problem'</i> may be highly significant in relation to a specific objective or component of the strategy; for example in relation to HRA.</p> <p>This concern could be avoided/addressed by additional wording to clarify this point, for example: <i>"This issue is not considered to be significant in terms of SA/SEA, but may be significant and may need further consideration and assessment at a different stage in the wider strategy assessment process"</i>.</p>	<p>stand-alone document, the information, analysis and allocation of an assessment score is heavily dependent on other evidence studies that will be undertaken as part of the Strategy - for example HRA or economics studies. No change is proposed. The assessment score will be accompanied by an explanatory text for the reader.</p>
2.8.1	12	<p>Please note that the Habitat Regulations have recently been updated and the correct regulations to refer to are now the 'Conservation of Habitats and Species Regulations 2017'. These include changes to various regulation numbers.</p> <p>We note that it is stated that <i>'Information from the HRA will support the SA appraisal of options against biodiversity objectives relating to the Natura 200 sites'</i>. We welcome this, as there will be an overlap of issues common to both the SA/SEA and the Strategy HRA. However, it is not clear from the scoping report or timelines within when the HRA is planned? The alternatives test component of the HRA is of particular relevance to the SA/SEA, and the HRA will need to be undertaken in parallel to the SA/SEA in order for it to be available to support and inform these broader assessments.</p>	<p>Noted.</p> <p>Noted.</p> <p>Reference must be made to the programme for HRA timing; when this is finalised further stage SA reports may include the information sought.</p>
3.4	18	<p>Q1 The Humber Nature Partnership are in the process of producing a Recreational Disturbance Strategy, as SPA birds in some parts of the estuary are known to be particularly vulnerable to and/or are already being affected by disturbance. This is relevant to the Strategy in terms of the potential for additional disturbance during the construction of flood defence and flood alleviation schemes, as well as having some relevance to the design, construction and management of compensation habitat schemes.</p>	<p>Noted.</p> <p>Comments shared for consideration for the appraisal work outside the SA.</p>
5.7	42	<p>Q2 Sections 4 and 5 of the scoping report appear to contain a good overview of relevant topics and issues for the study area in terms of the environmental baseline.</p>	<p>Noted.</p>
6.6	54	<p>Q3 Yes at a strategic/high level which is appropriate for SA/SEA scoping.</p>	<p>Noted.</p>

North Lincolnshire Council	3.2	13 (pdf 29)	The latest Habitats Regulations are dated 2017: <a href="https://www.legislation.gov.uk/ukxi/2017/1012/contents/made">https://www.legislation.gov.uk/ukxi/2017/1012/contents/made</a>	Noted. New text added in Appendix 1 and section 3.2.
	3.4	18 (pdf 34)	Q1: Are there any other policies, plans or programmes (PPPs) that contain environmental protection objectives, economic and social objectives or identify issues that are not covered by this PPP review (see full list of reviewed policies in Appendix 1)? Are there any local plans, such as Neighbourhood Plans, that could fall within the study area?  A: Lincolnshire Biodiversity Action Plan 3rd Edition October 2011 (Revised October 2015)  <a href="http://www.glnp.org.uk/admin/resources/lincs-bap-2011-2020-review-2015final.pdf">http://www.glnp.org.uk/admin/resources/lincs-bap-2011-2020-review-2015final.pdf</a>	Noted. New text added in Appendix 1.
	4.2	22 (pdf 38)	It is worth noting here that access and recreation may conflict with the Humber Estuary Conservation Objectives (though this does get a mention in 4.3.3).	Noted. No change.
	6 Biodiversity	51 (pdf 67)	The biodiversity objectives, criteria and indicators seem OK.	Noted
	Q3	54 (pdf 70)	Q3. Do the SA objectives provide a reasonable framework through which the likely significant social, economic and environmental effects of the strategy are assessed? Are there any other indicators which are relevant to the strategy?  A: The biodiversity objectives, criteria and indicators seem OK.	Noted
	7.2	58 (pdf 74)	Are there any other problems, opportunities or issues that are relevant to the Strategy that have not been covered?  A: Potential impacts on coastal grazing marsh, high tide roosts, and the Barton-New Holland Claypits are implied in the SA	Noted. This information and any other spatially-specific information will be considered at short list options stage.

			Framework, but not covered as explicitly as matters relating to coastal squeeze.	
	Fig. 6	Pdf 132	The area east of Scunthorpe indicated as "Mixed Use / Future Development" includes large areas of Ancient Woodland. This is an irreplaceable habitat which should not be developed unless the needs and benefits of development on that location are over-riding. What is the source of this proposal?	Noted. Source - Local Plan GiS layers supplied by participating local authorities. The Mixed Use area that is being discussed is out of the Strategy study area, although impact of the Strategy on the Ancient woodland will be considered in the SA.  Comments shared for consideration for the appraisal work outside the SA.
	Fig. 11	Pdf 137	In North Lincolnshire, some Local Wildlife Sites and Local Nature Reserves are not shown. However, these are largely outside the study area.	Noted.  Additional GIS layers request, aimed specifically at local sites of biodiversity value was requested on 07.02.2018.
Historic England	Section 5.5.1		<p>In general terms we consider that the Historical Overview (Section 5.5.1) is very good in setting the scene about 'place', but it does not go far enough. It is a shame that the Overview is broken down into individual heritage assets, such that all we have is the historic environment represented or defined as a list of names and places. We do not think that this captures the character of the area. A better approach might be the formulation of area based project plans which consider the historic environment holistically and thereafter identify priority areas.</p> <p>Additionally we think that the approach to the understanding of the historic environment would benefit from the creation of 'a narrative' establishing the story of the area. It may have been the case that the area indicated in the flood strategy can be characterised as a zone that has always experienced fluidity, change and reclamation and inundation. If this is the case what does that tell us about the place, the communities, harm and the opportunities for 'place-making' as well as the opportunities for 'mass observation/recording exercises' with the general public.</p>	Noted.

	Table 5.1		Specifically we think that Table 5.1 should include known 'non-designated heritage assets';	Noted. New text added.
	Table 6.1		Table 6.2 is somewhat confusing	Table will be reviewed.
	Appendix 1		Appendix 1 should include the 1990 Planning (Listed Building and Conservation Areas) Act and the 1979 Ancient Monuments and Archaeological Areas Act.	Noted. New text added in Appendix 1.
Lincolnshire Wildlife Trust	Q1	Page 37	<p>References to the Habitats Regulations should be updated to the most recent version of the legislation: The Conservation of Habitats and Species Regulations 2017.</p> <p>We would suggest that reference should also be made to the Lawton Report, Making Space for Nature. Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.J., Tew, T.E., Varley, J., &amp; Wynne, G.R. (2010) Making Space for Nature: a review of England’s wildlife sites and ecological network. Report to Defra.</p> <p>There should also be reference to Biodiversity 2020: A strategy for England’s wildlife and ecosystem services, Defra, 2011.</p> <p>A new iteration of The Lincolnshire Wolds AONB Management Plan for 2018-2023 is currently being consulted on. We would suggest that references should be amended to the new version once adopted.</p> <p>The Environment Agency and Natural England are partners in the Lincolnshire Biodiversity Action Plan 3rd Edition. We would suggest that this is a relevant document in Lincolnshire, North Lincolnshire and North East Lincolnshire and therefore should be included. Other county or organisational BAPs may also be relevant.</p>	Noted. New text added in Appendix 1.
	Figure 11	App. 2	The mapping seems to suggest that not all non-statutory nature conservation sites seem to have been included. It is difficult to tell at this scale but it appears that Sites of Nature Conservation	Noted.



		<p>Importance (SNClIs) do not seem to be represented. These were the predecessors of Local Wildlife Sites and have not yet been resurveyed using the more rigorous criteria. Until such time as they are re-evaluated, they should receive equal status as LWSs. It also appears that some of the Lincolnshire Wildlife Trust sites such as Barrow Haven Reedbed and Fairfield Pit are not represented. This may be because they are designated under the Humber Estuary SSSI or because 'nature reserves' have not been included as a separate 'designation'.</p>	<p>An additional GIS layers request, aimed specifically at local sites of biodiversity value, was requested on 07.02.2018.</p>
Appendix 3-2		<p>Environmental Factors, we would query why the list of nature conservation designations includes RSPB nature reserves but not Wildlife Trust sites, this should perhaps be amended to include a fully representative list of nature reserve sites in the study area. We would also recommend that this appendix includes reference to non-statutory designations for a more complete picture of nature conservation designations in the area.</p>	<p>Noted. Additional GIS layers request, aimed specifically at local sites of biodiversity value or local wildlife sites has been requested on 07.02.2018. Appendix 2-11 has been revised based on data returned by some of the Local Authorities.</p>
Section 7.2		<p>Are there any other problems, opportunities or issues that are relevant to the Strategy that have not been covered?</p> <p>We are not aware of any.</p>	<p>Noted</p>
Q3		<p>Do the SA objectives provide a reasonable framework through which the likely significant economic, social and environmental effects of the Strategy can be assessed?</p> <p>Yes, the objectives appear to provide a reasonable framework for assessment.</p>	<p>Noted</p>
Section 7.2		<p>Are there any other indicators which are relevant to the Strategy that could be used for assessment or monitoring purposes?</p> <p>We are not aware of any at this time.</p>	<p>Noted</p>
Q4		<p>Are there any other potential conflicts between the proposed SA objectives and the Strategy that have not been identified in the compatibility assessment?</p>	<p>Noted</p>

			We do not foresee any potential conflicts at this time.	
	Section 7.2		<p>Do you believe that the significant impacts of the Strategy can be identified using this approach?</p> <p>We agree that this approach should allow significant impacts to be identified.</p>	Noted
	Section 7.2		<p>Are there other/ additional methodologies that could be used to identify the significant impacts of the Strategy?</p> <p>We are not aware of any.</p>	Noted

2018 Version