



Leicester Integrated Flood Risk Management Strategy - Strategic Environmental Assessment (SEA) Scoping Report

A Summary of Consultation Responses

Report – ENVIMMI001442

Report Version 3

December 2016

We are the Environment Agency. We protect and improve the environment. Acting to reduce the impacts of a changing climate on people and wildlife is at the heart of everything we do.

We reduce the risks to people, properties and businesses from flooding and coastal erosion.

We protect and improve the quality of water, making sure there is enough for people, businesses, agriculture and the environment. Our work helps to ensure people can enjoy the water environment through angling and navigation.

We look after land quality, promote sustainable land management and help protect and enhance wildlife habitats. And we work closely with businesses to help them comply with environmental regulations.

We can't do this alone. We work with government, local councils, businesses, civil society groups and communities to make our environment a better place for people and wildlife.

Published by:

Environment Agency
Horizon House, Deanery Road,
Bristol BS1 5AH
Email: enquiries@environment-agency.gov.uk
www.gov.uk/environment-agency

Further copies of this report are available from our publications catalogue:
www.gov.uk/government/publications

or our National Customer Contact Centre:
T: 03708 506506

Email: enquiries@environment-agency.gov.uk.

© Environment Agency 2016

All rights reserved. This document may be reproduced with prior permission of the Environment Agency.

Contents

1. Introduction	4
2. How we ran the consultation	4
3. Summary of key findings and actions we will take	4
4. Summary of responses by topic	5
4.1. Overarching Themes	6
4.2. Water and Soil	7
4.3. Biodiversity, Flora and Fauna	8
4.4. Population and Human Health	8
4.5. Climatic Factors.....	9
4.6. Landscape and Cultural Heritage	10
5. Next Steps	11
6. Annexes	12
Annex A: List of consultation questions	12
Annex B: List of organisations	14
References	15

1. Introduction

Flood risk management across Leicester is extremely challenging due to the complex interactions between different sources of flooding, including the River Soar and its tributaries, other smaller watercourses, and surface water flooding. The Environment Agency is working in partnership with Leicester City Council to prepare an Integrated Flood Risk Management Strategy (IFRMS) for the River Soar Catchment. The Leicester IFRMS will ensure the risk of flooding from all sources is properly managed by identifying and appraising at a strategic level a full range of flood risk management measures.

To inform the development of the Leicester IFRMS a Strategic Environmental Assessment (SEA) is being produced to ensure appropriate consideration is given to the potential environmental effects of the flood risk measures included in the IFRMS. The SEA fulfils the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). As part of these requirements a SEA Scoping Report was published for consultation in September 2016. The purpose of the consultation was to seek views on the proposed scope of the SEA, enabling us to ensure the assessment focuses on all relevant environmental issues and potential impacts at an appropriate level of detail.

This document presents a summary of the responses to the consultation.

2. How we ran the consultation

The consultation exercise was published on GOV.UK with a link to the Environment Agency online consultation portal. The consultation ran for 6 weeks from 19 September to 28 October 2016.

Respondents were able to complete an online questionnaire, with the option to send additional comments via email or letter. The questionnaire considered each of the topics set out in the SEA Scoping Report, such as biodiversity, population and climatic factors.

The SEA Scoping Report was produced in accordance with 2004 SEA Regulations. To ensure responses were maximised, we emailed statutory consultation bodies such as Natural England and Historic England, as well as other key partners and external stakeholders, to announce the launch of the consultation. We also promoted the consultation locally to partners and stakeholders during the consultation period.

We asked whether consultees supported our proposals outlined within the SEA Scoping Report. In addition, we asked them to suggest any further information or specialist knowledge that could inform the assessment process and be used to further develop the Leicester IFRMS.

3. Summary of key findings and actions we will take

We received responses from a variety of organisations as well as members of the public. Table 1 shows the number of responses by stakeholder type.

Table 1: Summary of stakeholder responses

Type	Number of Responses
Governmental organisations	4
Non-Governmental organisations	1
Environmental organisations	1
Members of the Public	2

In general, there was broad agreement over the scope and objectives set out in the SEA Scoping Report, with most responses agreeing that the proposed approach was appropriate to the needs of the Leicester IFRMS.

Whilst a review of individual responses was undertaken, general agreement between stakeholders allowed a number of key themes to emerge:

- Plan and policy documents reviewed in the SEA Scoping Report need to be updated in line with the most recent guidance
- Inter-disciplinary linkages were considered to be underdeveloped in places, with stakeholders generally requesting a more holistic approach to the SEA assessment process
- The topic choices covered in each chapter of the SEA Scoping Report were considered suitable.

This document responds to comments by aggregating the responses received into key topics and themes. Overall, we have sought to address individual responses by reviewing and, where relevant, updating the SEA assessment process which will inform the development of the emerging IFRMS.

4. Summary of responses by topic

The consultation contained 27 questions, with the majority split across five topics (chapters) included within the SEA Scoping Report. Most of the questions required a 'yes or no' response, with the option to provide further explanation if required. It should be noted that not all respondents kept to the consultation response format, or answered all the questions. In these instances, we have addressed these comments as appropriately as possible within this document. For a list of the questions asked, please see Annex A.

We have reviewed all of the responses submitted during the consultation. Across the consultation responses, a number of more generalised themes emerged, not specific to a particular topic. These are summarised as overarching themes and are responded to first in Section 4 below.

The summary then reviews in more detail each of the five topic based chapters. Within each topic, a number of sub-themes were also identified and used to group responses. These included:

- Scope and Objectives
- Plan and Policy Updates
- Additional Information and Technical Changes

Where consultees have provided a comment which suggests overall agreement with the SEA Scoping Report, we have not provided a specific response.

4.1. Overarching Themes

4.1.1. SEA Objectives and Assessment Criteria

Comments

In general, respondents were supportive of the SEA objectives and assessment criteria proposed. However, for certain topics, amendments were suggested to allow for a more thorough review of the potential impacts of the IFRMS.

Our Response

The objectives and assessment criteria relating to each of the individual topics have been reviewed in line with the suggestions received. Where appropriate, these have been incorporated into the development of our final SEA methodology. Please refer to individual topics outlined later in this chapter.

4.1.2. Plan and policy updates

Comments

Many respondents identified certain plan and policy updates to the review of national and local policies set out in the SEA Scoping Report. These included giving greater prominence to national policies, such as Biodiversity 2020, as well as updating local plans relating to climate change, surface water management, green infrastructure, green space and Biodiversity Action Plans.

Respondents also commented on the role of the SEA in promoting sustainable development, suggesting the report should further encourage the use of sustainable strategies when planning and appraising the impact of new infrastructure.

Our Response

We have reviewed the additional plans, policies and updates suggested and, where relevant, these will be taken forward in the appraisal of the options and included in the SEA Environmental Report and the associated strategy. The importance of adhering to sustainable visions and plans will also be further reflected within the report.

4.1.3. Comments on the strategy

Comments

In general, respondents were pleased to find that an IFRMS is being developed for Leicester and welcomed measures to reduce flood risk across the City. However some respondents expressed concerns regarding the scope of the high level flood risk management options under consideration for Braunstone Brook and Willow Brook, especially when understanding why options with significant environmental benefits, such as river restoration and re-naturalisation measures, had not been included.

Our Response

We acknowledge that the level of detail regarding river restoration and re-naturalisation measures was not fully reflected in the SEA Scoping Report at this stage. Where appropriate, the ongoing modelling for the options will identify opportunities for an integrated approach for managing flood risk and delivering environmental benefits.

4.1.4. Inter-relationships between disciplines

Comments

A number of respondents expressed concerns about the inter-relationships between the different topics contained within the SEA Scoping Report. These included giving further consideration to

addressing cross-disciplinary impacts, and ensuring that the assessment is mindful of both the natural and cultural environment as a whole.

This was particularly prominent in the Biodiversity, Flora and Fauna chapter (Chapter 3) where it was felt that the assessment overlooked potential linkages with cultural heritage, landscape and climate.

Our Response

We agree with the importance of considering the inter-relationships between disciplines to ensure all potential impacts are identified and evaluated in an appropriate way. We will therefore revise our assessment process, in relation to the comments made and ensure robust consideration of the linkages between the different topics. We will include a section within each discipline on the inter-relationships.

4.2. Water and Soil

4.2.1. Scope and Objectives

Comments

In general, the majority of respondents agreed with the scope and objectives set out in the Water and Soil chapter (Chapter 2). One consultee advised that further objectives could be included, such as the promotion of Sustainable Drainage Systems (SuDS) on brownfield land, the use of sustainable waste management techniques and raising further awareness of flood risk issues.

Our Response

We have reviewed the additional suggestions and will ensure they are adequately captured in the assessment criteria and study objectives.

4.2.2. Plan and Policy Updates

Comments

The respondents made no comments on the plans and policies contained within the Water and Soil chapter.

4.2.3. Additional Information and Technical Changes

Comments

Some consultees suggested additional information and technical changes to enhance the SEA baseline. Specifically, one consultee made reference to a recent study into sediment accumulation and transport on Willow Brook.

Another consultee suggested that the scope of the assessment be updated to consider the potential impact of the IFRMS on fluvial morphology, highlighting the critical link between river channel morphology and ecology.

Our Response

We have reviewed the additions to, and clarifications of, the baseline and the assessment criteria and will ensure that the issues raised are considered to an appropriate level of detail. We will also ensure that the new information provided is included within the strategic appraisal of the options for managing flood risk.

4.3. Biodiversity, Flora and Fauna

4.3.1. Scope and Objectives

Comments

The majority of consultees agreed upon the scope related to biodiversity, flora and fauna and confirmed that it meets the requirements set out in the SEA Regulations. However, there was a consensus that the objectives should also include the promotion of green and blue infrastructure, as well as biodiversity.

Several respondents also queried the scope of the assessment, specifically questioning the extent of the study area and whether it was limited to the administrative boundary of the City of Leicester.

Our Response

We have amended the scope of the SEA assessment criteria to reflect the comments and ensure the appropriate consideration of green and blue infrastructure networks. We have reviewed the baseline information and it will be updated to reflect appropriate coverage of areas outside of the City boundary.

4.3.2. Plan and Policy Updates

Comments

Many respondents suggested updates to the plans and policies reviewed within the biodiversity chapter of the SEA Scoping Report. These included referencing the Strategic Green Infrastructure (GI) Strategy and Leicester's GI strategy. Local plans and targets, such as the Sustainability Action Plan (SAP), were also referred to.

Our Response

We have reviewed the additional plans, policies and updates suggested and, where relevant, these will be taken forward in the appraisal of the options and included in the SEA Environmental Report and the associated strategy.

4.3.3. Additional Information and Technical Changes

Comments

Respondents provided examples of additional documents and surveys that may be considered within the assessment process. Updated information on local wildlife sites and priority habitats were put forward by respondents.

Our Response

We will ensure that additional information and site specific surveys will be reviewed for applicability to the strategic nature of the assessment. Additional and updated information will be taken into account in the assessment process and the emerging strategy.

4.4. Population and Human Health

4.4.1. Scope and Objectives

Comments

Most respondents agreed upon the scope of the population and human health assessments, indicating it was appropriate and proportionate to the requirements of the SEA. One respondent suggested that the IFRMS should promote options which have additional health benefits to the local community.

Our Response

We are pleased with the agreement of the responses to the proposed scope. The assessment criteria for this topic have been reviewed and we feel there is benefit in further expanding the scope of the assessment to include an additional topic called 'infrastructure for communities'. This will provide the opportunity to give greater consideration to flood risk and important community infrastructure such as roads, railways, hospitals, schools etc.

4.4.2. Plan and Policy Updates

Comments

In general, most respondents commented on the need to review and update the plans and policies set out under the Population and Human Health chapter. One consultee suggested including the Leicester City Cycle Action Plan given its relevance to human health.

Reference was also made to national policies, with some respondents recommending the 1990 Environmental Protection Act could be included within this section as it is a fundamental piece of legislation.

Our Response

We have reviewed the additional plans, policies and updates suggested and, where relevant, these will be taken forward in the appraisal of the options and included in the SEA Environmental Report and the associated strategy.

4.4.3. Additional Information and Technical Changes

Comments

The respondents made no suggestions for additional information to be contained within the Population and Human Health chapter.

4.5. Climatic Factors

4.5.1. Scope and Objectives

Comments

The scope and objectives related to climatic factors were generally agreed upon by respondents.

4.5.2. Planning Policy Updates

Comments

Most respondents were in agreement with the plans and policies set out in the Climatic Factors chapter. However, some respondents suggested the Leicester GI Strategy be considered in relation to this topic as climate change is a key priority area for the strategy.

Our Response

We have reviewed the additional plans, policies and updates suggested and, where relevant, these will be taken forward in the appraisal of the options and included in the SEA Environmental Report and the associated strategy.

4.5.3. Additional Information and Technical Changes

Comments

One respondent suggested that more information regarding greenhouse gas emissions from road and transport could be considered within the chapter.

Our Response

We will strengthen the role that road transport and greenhouse gas emissions will be given within the assessment where this is relevant to the IFRMS.

4.6. Landscape and Cultural Heritage

4.6.1. Scope and Objectives

Comments

A number of respondents did not fully agree with some aspects of the scope relating to Landscape and Cultural Heritage. Some consultees suggested that more emphasis should be given to non-designated archaeological assets within the SEA.

It was also suggested that, where feasible, site assessments should be undertaken to inform the options appraisal process.

Our Response

We agree the assessment of heritage assets will consider, at an appropriate level of detail, non-designated archaeological assets and be supported by early liaison with the local authority partners to check for any potential site constraints as well as opportunities.

In addition, we will ensure the assessment gives specific consideration to landscape and cultural heritage to ensure all potential impacts are considered and evaluated in an appropriate way.

4.6.2. Planning Policy Updates

Comments

A number of consultees made suggestions about necessary updates to a range of plans and policies. The majority of consultees raised the need for updating specific policies, including those relating to Leicester's GI strategy.

Our Response

We have reviewed the additional plans, policies and updates suggested and, where relevant, these will be taken forward in the appraisal of the options and included in the SEA Environmental Report and the associated strategy.

4.6.3. Additional Information and Technical Changes

Comments

The respondents made no suggestions for additional information to be contained within the Landscape and Cultural Heritage Chapter

5. Next Steps

The next steps to this process involve the following:

- The consultation responses we received on the SEA Scoping Report are being incorporated into the assessment process and the next set of reporting documents.
- We will be undertaking further stakeholder engagement throughout the process of developing the IFRMS. This will begin with stakeholder and partner meetings in early 2017 and continue throughout spring 2017.
- We will ensure that the ongoing stakeholder engagement will continue to feed into and inform the option development, the SEA assessment process and the development of the IFRMS.
- We have been undertaking extensive work to understand the flood mechanisms in the sub catchments of the City. This work will be completed in early 2017 and will indicate a suite of flood risk measures for each sub-catchment and will support the development of the IFRMS and the options appraisal.
- We will ensure that the SEA process integrates with the development of the IFRMS and helps to inform the option selection. The Environmental Report is the primary output from the SEA process and the method for reporting the SEA.
- We will issue both the draft IFRMS and the supporting SEA Environmental Report for consultation. The Environmental Report will include an outline of how the consultation responses have informed the assessment of the IFRMS.

It is envisaged that the draft IFRMS and SEA Environmental Report will be issued for consultation in summer 2017.

Individuals who wish to follow up their responses, or points made within this document, in more detail are welcome to contact us by emailing:

Amanda McDonnell, Senior Environmental Project Manager at:

amanda.mcdonnell@environment-agency.gov.uk

6. Annexes

Annex A: List of consultation questions

Questions 1-4 addressed general consultee information, including names and contact details.

Chapter 2 Water and Soil

5. Do you agree with the scope on water and soil in Chapter 2?
6. Do you agree in combining water and soil in one chapter as per the SEA guidance headings?
7. Please tell us if you have any additional information you could provide on water and soil.
8. Do you agree with the SEA objectives considered in Chapter 2?
9. Is there an alternative to the plan for water and soil?

Chapter 3 Biodiversity, Flora and Fauna

10. Do you agree with the scope on Biodiversity, Flora and Fauna in Chapter 3?
11. Please tell us if you have any additional information you could provide on biodiversity, flora and fauna
12. Do you agree with the SEA objective as developed in Chapter 3?
13. Is there an alternative to the plan for biodiversity, flora and fauna?

Chapter 4 Population and Human Health

14. Do you agree with the scope on population and human health in Chapter 4?
15. Please tell us if you have any additional information you could provide on population and human health.
16. Do you agree with the SEA objective as developed in Chapter 4?
17. Is there an alternative to the plan for population and human health?

Chapter 5 Climatic factors

18. Do you agree with the scope on climatic factors in Chapter 5?
19. Please tell us if you have any additional information you could provide on climatic factors.
20. Do you agree with the SEA objectives as developed in Chapter 5?
21. Is there an alternative to the plan on climatic factors?

Chapter 6 Landscape and Cultural Heritage

22. Do you agree with the scope on landscape and cultural heritage in Chapter 6?
23. Do you agree in combining landscape and cultural heritage in one Chapter as per the SEA guidance headings?
24. Please tell us if you have any additional information you could provide on landscape and cultural heritage.
25. Do you agree with the SEA objectives as developed in Chapter 6?

26. Is there an alternative to the plan for landscape and cultural heritage?

Further comments

27. Please tell us if you have any further comments on Chapters 2 - 6 of the Strategic Environmental Assessment report.

Annex B: List of organisations

The following table names the organisations that took part in the consultation. Individual respondents are not included in this table.

Organisation
Leicester City Council (various departments)
Natural England
Leicestershire and Rutland Wildlife trust
Historic England
Highways England
Network Rail

References

6Cs Strategic GI Project Board (2010) Green Infrastructure Strategy Volume 1 Sub-Regional Strategic Framework [online]. Available from: <http://www.melton.gov.uk> [Accessed 01 December 2016]

EMGIN (2010) The Green Infrastructure Strategy vol 5: Strategic GI Network for the Leicester Principal Urban Area and Sub-Regional Centres [online]. Available from: <https://www.nwleics.gov.uk> [Accessed 21 November 2016]

European Commission (2011) The EU Biodiversity Strategy to 2020 [online]. Available from: <http://ec.europa.eu> [Accessed 26 November 2016]

Leicester City Council (2015) Climate Change Adaptation Plan [online]. Available from: <http://publications.leicester.gov.uk> [Accessed 03 December 2016]

Leicester City Council (2015-2024) Leicester Cycle City Action Plan [online]. Available from: <https://www.leicester.gov.uk> [Accessed 01 December 2016]

Leicester City Council (2015-2019) Leicester's Sustainability Action Plan [online]. Available from: <https://consultations.leicester.gov.uk> [Accessed 01 December 2016]

Leicester City Council (2007) Open Space Study [online]. Available from: <https://www.leicester.gov.uk> [Accessed 02 December 2016]

URS (2012) Surface Water Management Plan, Part 1 Report [online]. Available from: <http://www.leicester.gov.uk> [Accessed 01 December 2016]

The Environmental Assessment of Plans and Programmes Regulations 2004 (2004) [online]. Available from: <http://www.legislation.gov.uk> [Accessed 03 December 2016]

The Environmental Protection Act (1990) [online]. Available from: <http://www.legislation.gov.uk> [Accessed 01 December 2016]

**Would you like to find out more about us
or about your environment?**

Then call us on

03708 506 506 (Monday to Friday, 8am to 6pm)

email

enquiries@environment-agency.gov.uk

or visit our website

www.gov.uk/environment-agency

incident hotline 0800 807060 (24 hours)

floodline 0345 988 1188 (24 hours)

Find out about call charges (www.gov.uk/call-charges)



Environment first: Are you viewing this on screen? Please consider the environment and only print if absolutely necessary. If you are reading a paper copy, please don't forget to reuse and recycle if possible.