Consultee
Stamford Property Company Ltd

Agent

Consultee Agent

CommentID: SAPSA1

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 6: Stamford STAM15, 16 and 17

Nature of Response: Objecting

Reasons for this response:
Object to the summary of the site assessment and to the evidence which purports to underpin it, from which the council has determined that the site is unsuitable for consideration for development. This is flawed and appears to be driven by an objection by English Heritage expressed to the Examination. It is unclear whether this objection is based on the fact that a part of the sites (specifically STAM17) is visible from Burghley House or whether Burghley House is visible from the site. Stamford Property Co (SPC) do not believe it falls within the remit of English Heritage to prevent development that is merely visible from a listed building or registered park and garden. The proper tests are those prescribed in the Listed Building and Conservation Area Act. It is therefore inappropriate for the LPA to rely upon the view of English Heritage in dismissing the potential of the sites where the objection is unproven and unsound. Also not that the EH objection refers to the impact of development on the conservation area - a comment which is not made about any other sites considered in Stamford and is therefore inconsistent. Section 2 of the Evidence Document summarises the highway comments about the site. It should be noted that it has always been the intention of SPC to provide a connection between the A16 Uffington Road and Ryhall Road. This link is capable of providing a material positive benefit to traffic circulation in the network as well as being an element in a wider traffic solution for the town. The summary conclusion that there are significant constraints on access and connectivity are unsubstantiated and unsound.

Please set out what changes to the revised SA/SEA you consider to be necessary:
Matters that are not substantiated or are based solely on the views of English Heritage should not be accorded overriding weight as the basis of the assessment where they are not robust and supported by evidence.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector Yes

This matter was raised at a previous session of the Examination

SKDC Response: The representation states that the assessment of the likely impact on the setting of Burghley House is driven entirely by the views of English Heritage. This is not the case: officers assessing the site concluded that development would have a significant effect on both the landscape and setting of the town and upon views to and from Burghley House. This opinion was reinforced by the concerns expressed by English Heritage, specifically in respect of the setting of Burghley House. These concerns do not, of themselves, prevent development. They serve to highlight that there are issues which necessitate more detailed investigation, should any firm proposals be made. The SA/SEA process does not, of itself, determine whether sites are selected for allocation. The results of the assessment do not determine whether sites are allocated for development, they are used to inform the decision-making process. The comments reported in the Evidence Document relating to access and connectivity have been obtained from the Highway Authority.
Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to: Chapter 4: Methodology for assessing suitability of sites for allocation

Nature of Response: Objecting

Reasons for this response:
We broadly welcome the SA Framework in Table E in terms of SA Objective 9, although there are few minor amendments needed (following the informal advice we gave by email on 9 and 13 May 2013). With regards to the decision-making criteria, there needs to be reference to the setting of conservation areas and scheduled monuments (e.g. “Is the site within a conservation area or affect the setting of a conservation area” and “Does the site contain a scheduled monument or affect the setting of a scheduled monument?”). Reference to setting is also necessary for the first question on heritage assets. With regards to the effects column, we have no issues with the “no effect” and “uncertain” boxes (although there is no opportunity to highlight where development might result in the enhancement of a heritage asset). For the “minor adverse effect” box, it is not clear why it only refers to conservation areas, as there could be minor adverse effects (or “harm” to use NPPF language) on any heritage asset. For the “significant adverse effect” box, we agree that this includes the loss of a heritage asset, but it should also include reference to substantial harm to a heritage asset. For example, the development of Site HARL06 within the registered park and garden of Harlaxton Manor would not result in the loss of the registered park, but would result in substantial harm to this heritage asset equivalent to a significant adverse effect. Substantial harm could also be caused by development within the setting of a heritage asset.

Please set out what changes to the revised SA/SEA you consider to be necessary:
See above

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

SKDC Response: Development which would result in the loss of a heritage asset is regarded as a "significant adverse effect". Conservation Area Appraisals have identified some open spaces which are considered to be important and where the special character of the area would be eroded if the open space was lost. Development proposed in these areas is likely to have some adverse impact which must be evaluated prior to determination, and hence the "minor adverse effect". It is acknowledged that there are other developments which may result in "minor adverse effects". However, it is likely that because determination of these effects will be a matter of degree, some expert opinion will be required. In such cases, therefore, it is considered that the "uncertain" category would be the most appropriate, when assessing the sites.
Nature of Response: Commenting

Reasons for this response:

We broadly welcome the SA Framework in Table F in terms of SA Objective 9. Our only comment relates to the wording used for the “significant adverse effect” box. As with the SA Framework for site selection, it only refers to loss as a significant adverse effect, when it should also refer to substantial harm. Presumably the wording should also refer to the effect of policies, rather than development, given this is the SA Framework for policies.

Please set out what changes to the revised SA/SEA you consider to be necessary:

See above

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

No

SKDC Response: The Council would have no objection to Table F Objective 9 [impact column] being amended to make reference to Policies rather than Development. It is suggested that, for clarity and for consistency with the assessments of villages and sites, the wording be amended to read "significant adverse effect as the policy would result in the loss of or have a negative impact on ...".

Consultee 777611 Miss Fran Hitchinson Agent

Greater Lincolnshire Nature Partnership

CommentID: SAPSA12

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 2, Baseline Data paragraph Biodiversity

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership for South Kesteven, we also co-ordinate the Lincolnshire Biodiversity Action Plan, co-ordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and co-ordinate the Geodiversity Strategy. Because of our knowledge in this area, it is clear to us that the information described in the 'Biodiversity and Landscape' section of Appendix 2 uses out of date information. If this is the information that has been used to inform the SA/SEA then the whole document is flawed and erroneous. 1) County Wildlife Sites is old terminology it would be helpful to use current terminology of 'Local Sites' 2) 154 sites are listed against the Lincolnshire Environmental Records Centre/LBP as a source. This is erroneous. We did not provide these numbers. We hold the most up-to-date numbers and do not want to be listed as providing inaccurate data. 3) In line with government guidance and other local authorities 'assessment/issues' needs to be altered to include designating other sites that meet the criteria.

Please set out what changes to the revised SA/SEA you consider to be necessary:

1) Change 'County Wildlife Sites' to the term 'Local Sites - Wildlife' 2) Obtain accurate number of SNCIs and selected LWSs from the Lincolnshire Environmental Records Centre. In addition remove the reference to the Lincolnshire Biodiversity Partnership - it has become the Greater Lincolnshire Nature Partnership 3) Amend the 'assessment/issues' section to state: "protect existing, encourage enhancements and designate new sites meeting the criteria" 4) Rerun the village assessments and proposals against the new data as they may be affected. The baseline information may have an impact on decisions affecting the whole of the SA/SEA

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector
SKDC Response: Agree that indicator County Wildlife Sites should be changed to Local Sites - Wildlife to reflect current terminology. Information was obtained from Lincolnshire Wildlife Trust in 2005 which detailed all wildlife sites within the District - categorised into types of site. This provided the baseline data for the SA/SEA of the Council's plans. The baseline data has been updated regularly, using publicly available information from sources such as Natural England and LWT. Where nothing further has been found in respect of specific sites then the original data has been used. Information on the condition of SSSIs has been obtained from Natural England’s website, LWT nature reserves information from LWT website. The SA/SEA baseline data uses the latest information which was available at the time of the revision/updating: late 2012/early 2013. The sources are acknowledged in the report. At the time of the last updating, the latest information available in respect of the local sites management conservation status was the 2011/12 report from the Lincolnshire Biodiversity Partnership report. Lincolnshire Biodiversity Partnership has now become the Greater Lincolnshire Nature Partnership and the 2012/13 report provides updated figures for sites [ie numbers of sites in active management] and future reports can include updated baseline data. New sites are not designated by local authorities directly, therefore it would be inappropriate to include "... designate new sites ...".

Consultee 777611 Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership

CommentID: SAPSA13

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 2, Baseline data

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership for South Kesteven, we also co-ordinate the Lincolnshire Biodiversity Action Plan, co-ordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and co-ordinate the Geodiversity Strategy. This section on baseline data fails to take account of geodiversity - the variety of rocks, minerals and soils. Sites designated for their geological features are mentioned in 'Appendix 2 Biodiversity and Landscape' (RIGS) but are not mentioned here.

Please set out what changes to the revised SA/SEA you consider to be necessary:
We suggest inserting a new section on Geology structured in a similar fashion to the last line of the Biodiversity section [NB see response SAPSA12 on how we believe this line needs re-structuring]. This should refer to: - 'Local Sites - Geological' - 'assessment/issues' section should state: 'protect existing, encourage enhancements and designate new sites meeting the criteria' - data sources can state: 'Lincolnshire Environmental Records Centre' if it is the intention of SKDC to use the Records Centre to gain up-to-date information Finally, the village assessments and proposals against may need to be rerun as up-to-date data means they may be affected. The baseline information may have an impact on decisions affecting the whole of the SA/SEA.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

SKDC Response: The report uses the most up-to-date information at the time it was prepared. It is noted that the GLNP Report for 2012/13 [issued after the SA/SEA] shows 3 additional RIGS sites: Baseline data will, therefore, need to be updated for future reports when information about these sites becomes available. New sites are not designated local authorities, therefore it would be inappropriate to include "... designate new sites ...".

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Consultee: Miss Elizabeth Biott
Lincolnshire Wildlife Trust

CommentID: SAPSA14

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Chapter 3, Table B

Nature of Response: Objecting

Reasons for this response:
The Lincolnshire Wildlife Trust would question the assessment of the majority of the Local Service Centres against Objective 1 as green (++) ie that there would be no effect on known protected species or habitat as there are none present in or on edge of settlement (taken from Table A). Unless ecological surveys have been carried out on all the potential development sites then there is no way to know that there are no protected species or important habitats present that may be affected by development. In addition, we would also question the evidence base used to inform this assessment. Was up to date information obtained from the Lincolnshire Environmental Records Centre at the Greater Lincolnshire Nature Partnership for non-statutory designated sites and species records? If not, then the assessments made in the SA/SEA with regard to biodiversity are not founded on a robust and credible evidence base.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The assessment for all Local Service Centres against Objective 1 should be changed to blue (?) ie unknown effect.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

SKDC Response: SA/SEA baseline data, which is used in the assessment process, uses the latest information available at the time of the revision/updating: late 2012/early 2013. Table B reports the results of the assessment on each Local Service Centre, not on individual sites within the settlements. Where there are 'designated sites' which have been identified in, or near, to the settlement being assessed, it has been acknowledged that any impacts cannot be assessed until actual proposals are known, and the table shows this by '?'. The table notation '++' is reserved for those villages where no 'designated sites' have been identified.

Consultee: Miss Elizabeth Biott
Lincolnshire Wildlife Trust

CommentID: SAPSA15

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Chapter 3, Table C

Nature of Response: Objecting

Reasons for this response:
Following on from the comments made in relation to Table B the Lincolnshire Wildlife Trust has concerns regarding the identification of constraints within each village, as for
many villages it indicates that there are no constraints to site choice from wildlife. Whilst this may be the case there is no way to know this for certain unless ecological surveys have been carried out on all the potential development sites. There may be important habitats or protected species present on some sites which may be a constraint to development.

Please set out what changes to the revised SA/SEA you consider to be necessary:

It should be made clear that whilst there may be no known constraints from designated nature conservation sites or protected species, constraints may come to light following ecological surveys of proposed development sites.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

No

SKDC Response:  This table relates to villages rather than to specific sites within them. The phrase "no wildlife site" or "no wildlife constraints" has been used in the table to reflect those villages where no designated sites have been identified either within, or adjacent, to the village. Information was obtained from Lincolnshire Wildlife Trust in 2005 which detailed all wildlife sites within the District - categorised into types of site. This provided the baseline data for the SA/SEA and was used to identify which villages had wildlife sites either within or nearby. It is not practicable to have a full environmental survey carried out for each village. Where development is proposed for specific sites and planning applications are submitted than more detailed information is required [guided by Natural England Standing Advice] to ensure that development does not damage any protected species and habitats.

Consultee  
607553  Mrs Pamela Steel

CommentID:  SAPSA16

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:  No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to:  Chapter 4, Paragraph 4.6

Nature of Response:  Objecting

Reasons for this response:

The 5 stages of site selection do not include the Town or Parish Council's preferred choices. These councils are representative of the local communities and, in the absence of neighbourhood plans, are the voice of the local people. National Planning Policy Framework states that planning "should be plan-led empowering local people to shape their surroundings." Therefore to comply with the government's localism policy, one of the criteria for selecting sites should be the preferred choice of the Town Council/Local people/neighbourhood plan. NB Following SKDC's meeting on August 1st 2011, a list of sites recommended for allocation was sent to Market Deeping Town Council. SKDC's SCI states that "direct contact with parish councils will be maintained throughout the planning preparation process." However this is not adequately adhering to the localism policy as, although they are kept informed, the views and choices of the town council are frequently ignored or overridden. This I have witnessed in planning meetings and also read in Council minutes.

Please set out what changes to the revised SA/SEA you consider to be necessary:

Town / parish councils'/neighbourhood plan's preferred choice of sites must be one of the crucial criteria for choosing sites for development SKDC's site allocation and development plan must demonstrate the inclusion of the new ideals and policies of localism SKDC should ask all town and parish councils to draw up a neighbourhood plan

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

Yes

I am willing to speak if required.
This representation relates to the process of site selection, which is fully detailed in the Evidence Document and briefly described in the SA/SEA report. The views of Parish and Town Councils are taken into consideration during the final part of this process: Site Decision Making. The SA/SEA is an assessment of the suitability of each site under several headings [environmental, social and economic]. It is used to inform the choice of site for allocation. With particular reference to Market Deeping Town Council: the Town Council was asked for its views on the sites suggested for development. At the time of the initial consultations, 2009, the suggested sites included both the site at Peterborough Road/Towngate and land west of Lynchfield Road and south of Towngate East. The Town Council view was that land west of Lynchfield Road was the “obvious place to develop” and that land in the Peterborough Road/Towngate area was suited to light industry and leisure uses, and that it was important that the town gateways should be “attractive”. During 2010 the Town Council responded to the consultation on the Peterborough Road site [now being promoted as one, consolidated, site]. It reiterated its view that the site should be developed for light commercial units and that the strip of land adjacent to Peterborough Road should be an "Open Gateway to the town". Subsequent to both site consultations, the promoters of the site west of Lynchfield Road stated that the site was no longer available and withdrew it from consideration for allocation. The Peterborough Road site was, therefore, the only site being promoted for housing in the Deepings area which was large enough to accommodate the housing numbers required, and to provide some employment uses. The Town Council subsequently responded [September 2011] that it was unhappy with the allocation, citing the loss of open space. Among matters raised were concerns about highway infrastructure, cycle path provision and sympathetic development of the Peterborough Road entrance to the town. All of these issues have been addressed by conditions in policy DE3 which sets out the requirements of the masterplan which will guide development of this site, and which, it is stressed, should be prepared in consultation with the local community. It is a decision for Parish and Town Councils to decide whether the preparation of a Neighbourhood Development Plan is appropriate for their particular circumstances.

Consultee  
Miss Elizabeth Biott  
Lincolnshire Wildlife Trust  
CommentID: SAPSA17  

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No  

What did the previous representation relate to:  
Which part of the revised SA/SEA does your representation relate to: Appendix 2, Section - Biodiversity and Landscape  

Nature of Response: Objecting  
Reasons for this response:  
The information relating to non-statutory designated nature conservation sites (or Local Sites) given in the Biodiversity and Landscape section appears to be out of date. In addition to Sites of Nature Conservation Importance (SNCI) there are also a number of Local Wildlife Sites (LWS) in South Kesteven. LWSs are sites that have been surveyed and assessed against the LWS criteria for Lincolnshire published by the Lincolnshire Biodiversity Partnership (now the Greater Lincolnshire Nature Partnership (GLNP)). Up-to-date information should have been sought from the Lincolnshire Environmental Records Centre at the GLNP to inform the biodiversity baseline. It should be noted that Protected Roadside Verges are now known as Roadside Nature Reserves.  

Please set out what changes to the revised SA/SEA you consider to be necessary:  
The assessments made in the SA/SEA should be based on up-to-date information for both habitats and species. We would therefore recommend that information on non-statutory designated wildlife and geological sites (Local Sites) and protected or important habitats and species is sought from the Lincolnshire Environmental Records Centre. Some of the assessments made in the report may need to be altered when this additional information is taken into account.  

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No
SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The sources are acknowledged in the report. Baseline data will be updated for future reports when information about these sites becomes available.

Consultee Agent
261229 Welby Estate
The Welby Estate
CommentID: SAPSA18

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: Yes
What did the previous representation relate to: ADD17
Which part of the revised SA/SEA does your representation relate to: Chapter 3
Nature of Response: Objecting
Reasons for this response:
We consider the assessment is flawed in terms of the approach and inaccuracies, and has not been objectively undertaken. see Section 4 of the attached Report, which sets out or comments regarding the Assessment of LSCs contained within the SA/SEA.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The Assessment of LSCs needs to be revised for the reasons we set out in our Report. An Assessment of housing market need and deliverability should be included, in line with NPPF objectives.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector Yes
As a major landowner, we consider our concerns regarding LSCs and growth need to be debated at the Examination.

SKDC Response: comments relate to Section 4 of the attached report, and are itemised: Objective 2: because the distance from Harlaxton to Grantham town centre is approximately 3 miles it has been assessed as "a minor adverse effect" rather than a "significant positive effect" which has been reserved for those settlements where the distance is between 1 and 3 miles. Objective 4: the "minor adverse effect" of the assessment is consistent with information provided by AWS & EA [and detailed in the SAP submission modifications] that it is expected that sufficient capacity for some small-scale new development could be identified. Objective 9: it is proposed to amend the "significant adverse effect" wording to be less severe and to state that "... is likely to result in a negative impact ... ". This acknowledges that, while generally development will have adverse impacts on the setting of Harlaxton Manor, there may be sites within the village which can be developed without harm. Such sites would need to be assessed individually. Objective 12a: the criteria for this objective are clear that to be considered to have a good range of services, a village must have at least 10 of the named criteria. The information provided by this representation identifies only 7. Harlaxton has been identified as a Local Service Centre because it has a number of services and facilities which contribute towards its sustainability. This objective is used to identify which of the LSCs is the most suitable to have housing allocations. Objective 12b: information supplied by LCC Education Authority was used in this assessment. The provision, or lack of, a car park does not go any way to increasing the number of school places available. Objective 13: information from the housing needs survey was used in this assessment Objective 20: information from the village survey shows employment only in the village shop, pub, school and surgery. Only one other employment opportunities has been identified in the village. 4.12: re SA/SEA 3.20 - highlights that the need to protect the setting of Harlaxton Manor is a constraint to development in part, but not necessarily all, of the village. The report is clear that, while this is a "showstopper" to development there may be some areas of the village where development would not adversely impact on the setting of Harlaxton Manor. 4.15: placing Harlaxton in Tier 3: This is based on the overall results of
the assessment. Information regarding the services, facilities and employment opportunities shows that these are not extensive. Therefore, it is considered that placing Harlaxton in Tier 3 is appropriate. 4.25: bullet 1: housing of varying types and tenures on a variety of sites must meet the needs of the whole market; bullet 2: table 1 includes a list of objectives which have been scoped out. These are where the assessment would produce the same result for each village, and therefore no comparisons are possible; bullet 3: the Council believes that the assessment has been undertaken fairly and using all available information in a bid to make objective comparisons between villages; bullet 4 - assessing the likely delivery of specific sites is not part of the SA process. 4.26: The Council believes that the assessment was carried out fairly, using up-to-date information about the various settlements and, therefore, that the conclusions are justified. 4.27: The Council has identified that Harlaxton Manor and its Registered Park and Garden present constraints on development in and around Harlaxton village. The Council is aware that this is a “showstopper” to development in some parts of the village, but is also aware that there are likely to be areas within the village where development could be accommodated without harm to setting of Harlaxton Manor and Park. This is reflected in the overall assessment of Harlaxton.

Consultee
26149 Miss Elizabeth Biott
Lincolnshire Wildlife Trust

CommentID: SAPSA19

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

Nature of Response: Objecting

Reasons for this response:
The information relating to non-statutory designated nature conservation sites (or Local Sites) given in the Biodiversity section appears to be out of date. In addition to Sites of Nature Conservation Importance (SNCI) there are also a number of Local Wildlife Sites (LWS) in South Kesteven. It is not clear if County Wildlife Sites is actually referring to LWSs. LWSs are sites that have been surveyed and assessed against the LWS criteria for Lincolnshire published by the Lincolnshire Biodiversity Partnership (now the Greater Lincolnshire Nature Partnership (GLNP)). Up-to-date information should have been sought from the Lincolnshire Environmental Records Centre at the GLNP to inform the biodiversity baseline. It should be noted that the percentage of SSSIs in favourable condition is monitored by Natural England and that data on the percentage of SSSIs in favourable condition is therefore available from Natural England not the Lincolnshire Wildlife Trust.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The assessments made in the SA/SEA should be based on up-to-date information for both habitats and species. We would therefore recommend that information on non-statutory designated wildlife and geological sites (Local Sites) and protected or important habitats and species is sought from the Lincolnshire Environmental Records Centre. Some of the assessments made in the report may need to be altered when this additional information is taken into account. Lincolnshire Wildlife Trust should be removed from the Data Sources column relating to % SSSI in favourable condition.

SKDC Response: SA/SEA baseline uses the latest information available at the time of the revision/updating: late 2012/early 2013. The sources of the data are acknowledged in the report. Baseline data will be updated for future reports when information about these sites becomes available. Information on the condition of SSSIs was obtained from Natural England [via its website], and this is acknowledged in the report. Lincolnshire Wildlife Trust was included as a data source in error and it is agreed that this acknowledgement should be removed.
Consultee

662667 Larkfleet Limited

c/o Bidwells

Agent

462735 MR DAVID BAINBRIDGE

CommentID: SAPSA2

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: General

Nature of Response: Objecting

Reasons for this response:

Unfortunately the process undertaken in respect of preparation of a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is not considered to be legally compliant. The SA/SEA Addendum Report dated June 2013 seeks to explain the proposals in the DPD including the site selections made by the Council. The SA/SEA Addendum Report does not represent a genuine appraisal of the sustainability of the proposals in the DPD including site options as submitted to the Council prior to submission of the DPD for examination. The absence of a comprehensive SA/SEA report which appraises the sustainability of the proposals including site options as submitted to the Council prior to the submission of the DPD for examination does not comply with the Section 19 (5) (a) of the Planning and Compulsory Purchase Act 2004.

Please set out what changes to the revised SA/SEA you consider to be necessary:

It has been demonstrated that the data sources used to inform the SA/SEA are not sufficiently up to date and in part the assessment work is inaccurate and insufficiently thorough. The assessment is flawed leading to identification of LSC which are not the most sustainable and sites proposed for allocation which are not the most sustainable. Paragraph 3.7 of the SA/SEA Addendum Report states that no responses were received from Baston and Morton Parish Councils and therefore officers completed the facilities survey for these and other villages from previous information, website information and site visits. This considered inadequate and inequitable because all of the Parish Councils covering the LSC should have been contacted to inform the survey work. The facilities survey for the LSC continues to rely upon old data sources including bus timetables in December 2012 and GP survey in January/February 2012. This data should have been updated especially given the discussion at the examination hearings in respect of accuracy and thoroughness of the data and assessment undertaken by the Council. The summary in respect of Baston on page 43 of the SA/SEA Addendum Report has not been updated to reflect the more favourable position of Anglian Water as summarised in proposed modification PHMM21. This wrongly counts against Baston and is inaccurate and needs to be corrected. The summary in respect of Long Bennington on page 45 of the SA/SEA Addendum Report states there are listed buildings within the village. Whilst this is a factual statement which is equally applicable although absent from the summary for other LSC it is not considered that the presence of listed buildings in a LSC is a constraint to new development. This reference should be omitted. The summary in respect of Morton on page 46 of the SA/SEA Addendum Report states that "entrances to the village are sensitive". There is no explanation of this statement and this statement is not supported by evidence. There are no designations of land at the entrances to the village of Morton any different from entrances to other LSC and therefore this statement is inaccurate, it is not supported by evidence and it should be omitted. The conclusion of the village assessment on page 50 of the SA/SEA Addendum Report is not based on evidence and it is not consistent for the reasons given above and stated below. Baston is identified as a tier 3 and yet this is not supported by the evidence. Baston does not have any significant adverse effect on any of the objectives (i.e. red shading) and it only has 1 no. minor adverse effect on the objective (i.e. orange shading) and this is objective 16 which relates to employment opportunities. This orange shading has not been consistently applied based on evidence. There are employment opportunities in the village of Baston including a shop, public houses, agriculture and homeworking and Bourne and Market Deeping are both accessible by public transport. Morton is identified as a tier 2 and yet this is not supported by the evidence. Morton does not have any significant adverse effect on any of the objectives (i.e. red shading) and it only has 1 no. minor adverse effect on the objective (i.e. orange shading) and this is objective 16 which relates to employment opportunities. This orange shading has not been consistently applied based on evidence. There are employment opportunities in the village of Morton including a shop, public houses, school, agriculture and homeworking and Bourne is accessible by public transport. The assessment of Baston at Appendix 6 of the SA/SEA Addendum Report inaccurately retains a superseded reference to a cordon sanitaire. This is inaccurate and it
If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

Yes

It is necessary to participate in the discussion on this matter at an examination led by the Planning Inspector.

SKDC Response: The Council believes it has considered all site options presented to it prior to the commencement of the Examination. The representation implies that this is not the case, however, no specific site(s) has been referenced as not being assessed. The Council considers that the documents it has prepared are transparent and rigorous. The criteria which have been adopted both to eliminate sites regarded as complete non-starters and then to analyse and appraise the potential opportunity sites is clear from the start. Both in the Strategic Environmental Assessment, and also in the additional evidence document which accompanies it, it is very clear to the reader how the choices which the Council have made have been reasoned and justified and from a legal perspective the Council considers these documents to be robust. The assessment has been made using the most up-to-date information available to the Council at the time the assessment was undertaken (March - June 2013). All Parish Councils were contacted (January 2013) to update information held on local services/facilities etc. In those cases where a Parish Council (with a LSC village) response was not received the information was updated following officer site visits (March 2013) and other data sources. Bus timetables used were published in December 2012 (and valid until August 2013). The GP survey was conducted early in 2012 at which time all GPs indicated that they had surplus capacity for a large number of additional patients. House completion data shows that there have not been any significant developments in the LSCs during the intervening period to render this information out of date by the time of the village assessments in 2013. The EA and AWS statement regarding constraints in the water cycle was referenced in the assessment of the capacity of the villages. Whilst the statement indicates that capacity might be available to accommodate the development proposed in the town, the statement does not necessarily resolve their concerns about additional development utilising this capacity (although it should be noted that the site in Baston which is being promoted by Bidwells has now got planning consent - it is thus implied that capacity at the treatment works has been made available for the development). Reference to listed buildings in Long Bennington is under the column headed “constraints which may affect site choices”. This was a mechanism to flag up that there were site specific constraints in each village which might affect the choice of site, but which did not affect the allocation of a village into Tiers 1-4. Equally there are no specific designations at the entrance to Morton but the sensitivity of the entrance in relation to the Conservation Area is a specific issue which may affect site choices. The village conclusions on page 50 clearly reflect the framework established by the methodology. The allocation of each village into a tier reflects the process set out. The objection must therefore be to the process, however, no alternative methodology has been suggested as the means of differentiating one settlement from another. In reference to employment opportunities within the villages of Morton and Baston, it is recognised that these villages have a few local based employers such as shops and pubs (as do all LSCs). However, those villages which were assessed as having a significant positive effect on this objective (using objective 19 [which should read 20] of the framework on page 33 of the SA/SEA report) have an industrial site or area as well as a range of shops, pubs, hairdressers etc. These villages therefore provide a greater range of locally based jobs and, therefore, more opportunity to live and work within the village than those which only include local shops, pubs and work from home type businesses.

Consultee
26149 Miss Elizabeth Biott

Agent
Lincolnshire Wildlife Trust

CommentID: SAPSA20

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 5

Nature of Response: Objecting

Reasons for this response:
The Lincolnshire Wildlife Trust would question the assessment of the majority of the villages against Objective 1 as green (++) i.e. that there would be no effect on known protected species or habitat as there are none present in or on edge of settlement (taken from Table A). Unless ecological surveys have been carried out on all the potential development sites then there is no way to know that there are no protected species or important habitats present that may be affected by development. In addition, we would also question the evidence base used to inform this assessment. Was up to date information obtained from the Lincolnshire Environmental Records Centre at the Greater Lincolnshire Nature Partnership for non-statutory designated sites and species records? If not, then the assessments made in the SA/SEA with regard to biodiversity are not founded on a robust and credible evidence base. As a result of the above the Trust has concerns regarding the identification of constraints within each village. For many villages it indicates that there are no constraints to site choice from wildlife. Whilst this may be the case, there is no way to know this for certain unless ecological surveys have been carried out on all the potential development sites. There may be important habitats or protected species present on some sites which may be a constraint to development.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The assessment for all villages against Objective 1 should be changed to blue (?) i.e. unknown effect. We would suggest that it is made clear that whilst there may be no known constraints from designated nature conservation sites or protected species, constraints may come to light following ecological surveys of proposed development sites.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data, which is used in the assessment process, uses the latest information available at the time of the revision/updating: late 2012/early 2013. Appendix 5 reports the results of the assessment on each Local Service Centre, not on individual sites within the settlements. Where the 'designated sites' have been identified in, or near, to the settlement being assessed, it has been acknowledged that any impacts cannot be assessed until actual proposals are known, and the spreadsheet details the constraint and shows this as 'blue ? uncertain effect'. The spreadsheet designation 'green' is reserved for those villages where no 'designated sites' have been identified either within or on the edge of the village. Where specific proposals are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee
26149 Miss Elizabeth Biott
Lincolnshire Wildlife Trust

CommentID: SAPSA21

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 6
Nature of Response: Objecting

Reasons for this response:

The Lincolnshire Wildlife Trust would question the assessment of the majority of the proposed development sites against Objective 1 as green (++) i.e. that there would be no effect on known protected species or habitat as none are present on the site (taken from Table E). Unless ecological surveys have been carried out on all the potential development sites then there is no way to know that there are no protected species or important habitats present that may be affected by development. In addition, we would also question the evidence base used to inform this assessment. Was up to date information obtained from the Lincolnshire Environmental Records Centre at the Greater Lincolnshire Nature Partnership for non-statutory designated sites and species records? If not, then the assessments made in the SA/SEA with regard to biodiversity are not founded on a robust and credible evidence base.

Please set out what changes to the revised SA/SEA you consider to be necessary:

The assessment for all proposed development sites against Objective 1 should be changed to blue (?) i.e. unknown effect, and the wording should be changed to reflect this uncertainty pending full ecological surveys on each site.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data, which is used in the assessment process, uses the latest information available at the time of the revision/updating: late 2012/early 2013. Appendix 6 reports the results of the assessment on sites within each Local Service Centre. Where the 'designated sites' have been identified in, or near, to the settlement being assessed, it has been acknowledged that any impacts cannot be assessed until actual proposals are known. The spreadsheet designation 'green ++' is reserved for those sites where no 'designated sites' have been identified. Where specific proposals are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee 26149 Miss Elizabeth Biott
Lincolnshire Wildlife Trust

CommentID: SAPSA22

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 7

Nature of Response: Objecting

Reasons for this response:

The Lincolnshire Wildlife Trust has serious concerns regarding the majority of the summaries against Objective 1 (Biodiversity) which state that there are no known protected species or habitats for the majority of the sites. Of even more concern is that for two of the villages, Billingborough and Harlaxton, it states that there are no protected species or habitats on any of the sites. Unless ecological surveys have been carried out on all the potential development sites then there is no way to know that there are no protected species or important habitats present that may be affected by development. In addition, we would also question the evidence base used to inform this assessment. Was up to date information obtained from the Lincolnshire Environmental Records Centre (LERC) at the Greater Lincolnshire Nature Partnership for non-statutory designated sites and species records? If not, then the assessments made in the SA/SEA with regard to biodiversity are not founded on a robust and credible evidence base.

Please set out what changes to the revised SA/SEA you consider to be necessary:
If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data, which is used in the assessment process, uses the latest information available at the time of the revision/updating: late 2012/early 2013. Appendix 7 reports the results of the assessment on sites within each Local Service Centre, and highlights any identified areas of concern. The representation expresses concern about the conclusion “no known protected species or habitats on any of the sites” for Billingborough and Harlaxton. This statement has been made in respect of several villages, and reflects that there is no record of any protected species or habitats on any of the site under consideration. Where specific proposals are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee 26149 Miss Elizabeth Biott Agent Lincolnshire Wildlife Trust CommentID: SAPSA23

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to: Appendix 8

Which part of the revised SA/SEA does your representation relate to: Appendix 8

Nature of Response: Objecting

Reasons for this response:
STM1, STM2, STM3, B1, DE1, DE2, DE3, LSC1, SAP6, SAP7, SAP8, SAP9 The Lincolnshire Wildlife Trust would question the assessment of the above policies against Objective 1 as green (++) i.e. that there would be no effect on known protected species or habitat (taken from Table F) and the assertions that none of the allocated sites contain protected species or habitats. Unless ecological surveys have been carried out on all the potential development sites then there is no way to know that there are no protected species or important habitats present that may be affected by development. In addition, we would also question the evidence base used to inform this assessment. Was up to date information obtained from the Lincolnshire Environmental Records Centre at the Greater Lincolnshire Nature Partnership for non-statutory designated sites and species records? If not, then the assessments made in the SA/SEA with regard to biodiversity are not founded on a robust and credible evidence base.

Please set out what changes to the revised SA/SEA you consider to be necessary:
STM1, STM2, STM3, B1, DE1, DE2, DE3, LSC1, SAP6, SAP7, SAP8, SAP9 The assessment for all of the above policies against Objective 1 should be changed to blue (?) i.e. unknown effect, as the impacts on protected or important habitats and species will only become clear once full ecological surveys have been carried out on each development site.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: Appendix 8 reports the results of the assessment on the policies contained within the SA, and highlights any identified areas of concern. SA/SEA baseline data, which is used in the assessment process, uses the latest information available at the time of the revision/updating. This representation is concerned with the results of the assessment of the site-specific policies, and reflects that there is no record of any protected species or habitats on the specific sites under
consideration. Where specific proposals are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership

Agent

CommentID:  SAPSA24

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to: 

Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Ancaster

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site, in this case that no protected species or habitats have been identified. It is not practicable to have a full environmental survey carried out for each site. However, where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership

Agent

CommentID:  SAPSA25

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No
What did the previous representation relate to:
Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Barkston
Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "There are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats" NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site, in this case that no protected species or habitats have been identified. It is not practicable to have a full environmental survey carried out for each site. However, where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee Agent
777611 Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership

CommentID: SAPSA26

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:
Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Barrowby
Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.
Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site, in this case that no protected species or habitats have been identified. It is not practicable to have a full environmental survey carried out for each site. However, where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee
777611 Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership

CommentID: SAPSA27

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Baston

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then
more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership

Agent

CommentID:  SAPSA28

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:  No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to:  Appendix 6 - Billingborough

Nature of Response:  Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats" NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

SKDC Response:
SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership

Agent

CommentID:  SAPSA29

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:  No
What did the previous representation relate to:  
Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Castle Bytham

Nature of Response: Objecting

Reasons for this response: 
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:  
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

SKDC Response: 
SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee:  
777611 Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership

CommentID: SAPSA3

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:  
Which part of the revised SA/SEA does your representation relate to: Chapter 1, paragraph 1.22

Nature of Response: Commenting

Reasons for this response: 
The Greater Lincolnshire Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan. If contributing to the BAP is a key issue as mentioned in paragraph 1.22 why is South Kesteven not signed up to contribute to the BAP? Indeed it is one of the only local authorities in our area that is not contributing to the BAP, yet throughout the SA/SEA the writing implies that it does.

Please set out what changes to the revised SA/SEA you consider to be necessary:  
The tone of the document needs to be altered to: 1) say that SKDC will (future tense) contribute to the BAP, if that is their intention Or 2) if SKDC do not intend to contribute to
the BAP then reference should state they encourage developers and others to contribute to it (please note that we believe not contributing to the BAP has impacts on SKDC's ability to fulfil the NERC duty).

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

SKDC Response:  Although the Council is not a contributor to the BAP, it does, nevertheless support its aims and objectives. Policy EN1 of the adopted Core Strategy is concerned to protect and enhance the character of the District. To this end, all proposals and allocations must be assessed in relation to its criteria. These include statutory, national and local designations [both natural and historic], landscape condition, and biodiversity and ecological networks. The SA/SEA report reflects the Council's commitment to the aims and objectives of the BAP by acknowledging that projects should contribute towards BAP objectives. The report does not imply that SKDC is a contributor towards BAP preparation. Paragraph 1.22 [which is the subject of this representation] merely identifies that BAP objectives are among issues which are of relevance to the DPD production.

Consultee  Miss Fran Hitchinson  Greater Lincolnshire Nature Partnership

CommentID:  SAPSA30

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:  No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to:  Appendix 6 - Caythorpe

Nature of Response:  Objecting

Reasons for this response:

The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are “There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations ‘f’ and ‘g’ show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:

The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: “there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats”NB. please see our responses ‘f’ and ‘g’ as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of ‘no designated sites’ may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

SKDC Response:  SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and
habitats.

Consultee

Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership

Agent

Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership

CommentID: SAPSA31

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Colsterworth

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.
What did the previous representation relate to:
Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Corby Glen
Nature of Response: Objecting
Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee
777611 Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership

CommentID: SAPSA33

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:
Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Great Gonerby
Nature of Response: Objecting
Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.
Please set out what changes to the revised SA/SEA you consider to be necessary:

The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: “there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats” NB, please see our responses ‘f’ and ‘g’ as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of ‘no designated sites’ may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

SKDC Response:  SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership

Agent

CommentID:  SAPSA34

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:  No

What did the previous representation relate to:  
Which part of the revised SA/SEA does your representation relate to:  Appendix 6 - Harlaxton

Nature of Response:  Objecting

Reasons for this response:

The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are “There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations ‘f’ and ‘g’ show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:

The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: “there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats” NB, please see our responses ‘f’ and ‘g’ as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of ‘no designated sites’ may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

SKDC Response:  SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then...
more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership  
CommentID:  SAPSA35

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:  No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to:  Appendix 6 - Langtoft

Nature of Response:  Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

SKDC Response:  SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership  
CommentID:  SAPSA36

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:  No
What did the previous representation relate to:
Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Long Bennington
Nature of Response: Objecting
Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are “There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations ‘f’ and ‘g’ show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: “there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats”NB. please see our responses ‘f’ and ‘g’ as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of ‘no designated sites’ may need to change.

Reasons for this response:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: “there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats”NB. please see our responses ‘f’ and ‘g’ as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of ‘no designated sites’ may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee Agent
777611 Miss Fran Hitchinson Greater Lincolnshire Nature Partnership
CommentID: SAPSA37

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

Consultee Agent

CommentID: SAPSA37

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:
Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Morton
Nature of Response: Objecting
Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are “There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations ‘f’ and ‘g’ show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.
Please set out what changes to the revised SA/SEA you consider to be necessary:

The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats" NB, please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee
777611 Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership

CommentID: SAPSA38

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to: Appendix 6 - South Witham

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats" NB, please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then
more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership

Agent

CommentID: SAPSA39

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:  No

Which part of the revised SA/SEA does your representation relate to:  Appendix 6 - Thurlby

Nature of Response:  Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

SKDC Response:  SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership

Agent

CommentID: SAPSA4

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:  No
What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Chapter 3, Table A Paragraph 1

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership for South Kesteven, we also co-ordinate the Lincolnshire Biodiversity Action Plan. The wording states that: "SKDC will continue to deliver the objectives and associated actions set out in the Lincolnshire Biodiversity Action Plan". However, South Kesteven is not signed up to contribute to the BAP. Indeed it is one of the only local authorities in our area that is not contributing to the BAP, yet throughout the SA/SEA the writing implies that it does.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The tone of the document needs to be altered to: 1) say that SKDC will (future tense) contribute to the BAP, if that is their intention Or 2) if SKDC do not intend to contribute to the BAP then reference should state they encourage developers and others to contribute to it (please note that we believe not contributing to the BAP has impacts on SKDC's ability to fulfil the NERC duty).

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: The SA/SEA report acknowledges that projects should contribute towards the objectives of the BAP. The report does not imply that SKDC is a contributor towards the preparation of the BAP. Table A clearly identifies the BAP as a document which will be taken account of when assessing Local Service Centres.

Consultee
Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership

CommentID: SAPSA40

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Stamford

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.
If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector? No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee
777611  Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership

CommentID: SAPSA41

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD? No

What did the previous representation relate to: Appendix 6 - Bourne

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector? No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee
777611  Miss Fran Hitchinson

Agent
Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Deepings

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership is the Local Nature Partnership for South Kesteven, we also coordinate the Lincolnshire Biodiversity Action Plan, coordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and coordinate the Geodiversity Strategy. Row 1 states that there are "There are no known protected species or habitats on site. This is erroneous. The baseline information presented only goes as far as designated sites, and as our representations 'f' and 'g' show this information is out of date and inadequate. This SA/SEA cannot know if there are protected species or protected habitats on these sites. Only a full survey can ascertain this. In the meantime information from the Lincolnshire Environmental Records Centre would provide an indication yet this information has not been sought either.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The wording of the assessment needs to be changed to reflect the information included within the SA/SEA and the further information required for certainty. Our suggestion is: "there are no designated sites, further investigation is required to determine the presence/absence of protected species and habitats"NB. please see our responses 'f' and 'g' as these state that the biodiversity baseline information presented is out of date and requires revising. As such these assessments of 'no designated sites' may need to change.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: SA/SEA baseline data uses the latest information available at the time of the revision/updating: late 2012/early 2013. The assessment wording reflects the information held about each site. It is not practicable to have a full environmental survey carried out for each site. Where planning applications are submitted then more detailed information is required (guided by Natural England Standing Advice) to ensure that development does not damage any protected species and habitats.

Consultee Agent

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Chapter 4 Site Assessment methodology

Nature of Response: Objecting

Reasons for this response:
Compliance with the National Planning Policy Framework ('NPPF') The revised selection methodology and the resulting site selections do not comply with the principles and requirements of Paragraph 17 and 111 of the NPPF. Thus they are deficient. Compliance with adopted Core Strategy The revised selection process has not ensured that the SAP proposed allocations comply with Core Strategy SP1 (Spatial Strategy), Spatial Objective 3 (Sustainable Settlements) and Spatial Objective 4 (Accessibility and Travel).
SKDC Response: The site selection process was designed to reflect the principles of sustainable development set out in NPPF and the objectives of the Core Strategy. In relation to objective 3 (make effective use of land ...) this issue is covered by two separate SA/SEA objectives (objective 2 and 3); the SA/SEA assessment framework provides the opportunity to identify this as a significant positive effect for those sites which are brownfield. As a result the brownfield land to the east of Stamford (as depicted on plan A5 of the SCOT representation (SASub100) to the submission plan) has been allocated as STM1c and STM2d. The Council is not aware of any additional brownfield land being available for development to the east of the town and the representation does not identify any further areas specifically.

Objective 4 seeks to improve accessibility to jobs, houses and services. SA/SEA objectives 5b, 12a and b, 15, 16 and 20 all consider the proximity of sites to the town centre, schools, shops and GPs. The objectives also consider the proximity of sites to bus stops on regular or frequent bus routes, and assess the effect of each site against these objectives accordingly.

Consultee 778031 Voice of Stamford

CommentID: SAPSA44

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:

What did the previous representation relate to: Chapter 4 - Site Assessment Process

Nature of Response: Objecting

Reasons for this response:

Where the Council has carried out re-assessments of sites, it has failed to ensure consistency of approach. Out of date/inaccurate information has been used to inform assessments. Assessments have not been undertaken fairly. Little weight can be attributed to the role played by the SKDC Internal Challenge Group ('ICG') in the revised methodology and assessment process. The failure of the ICG to challenge the basis upon which consideration of the relevant Stamford planning applications had been undertaken destroys all credibility in the ICG and the role it was created to play in the revised methodology and assessment process.

Please set out what changes to the revised SA/SEA you consider to be necessary:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector Yes

SKDC Response: The Council considers that the documents it has prepared are transparent and rigorous. The criteria which have been adopted both to eliminate sites regarded as complete non-starters and then to analyse and appraise the potential opportunity sites is clear from the start. Both in the Strategic Environmental Assessment, and also in the additional evidence document which accompanies it, it is very clear to the reader how the choices which the Council have made have been reasoned and justified and from a legal perspective the Council considers these documents to be robust. The information used to prepared the site assessments has been updated wherever possible - this includes an update of the RAG assessment from Anglian Water, using the joint update statement from Anglian Water and the Environment Agency prepared in November 2012, information from up-to-date bus timetables, a re-assessment of all sites by highways and updated school...
capacity information. The role of the ICG is clearly set out in the evidence document. The site assessment process is separate from the planning application process, however the ICG had to have regard to decisions which had been made by the Council on planning applications.

Consultee
260968  Mr Tim Lee
Stamford Chamber of Trade and Commerce
CommentID:  SAPSA45

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to:  PHMM14

Nature of Response:  Objecting

Reasons for this response:
Where the Council has carried out re-assessments of sites, it has failed to ensure consistency of approach. In relation to its re-assessment of Site ADD43, the site is shown in Table 4 on Page 19 of the SED as being one of the Stamford sites "which have the most positive (or least adverse) effect on objectives" notwithstanding the Stage 3 criticisms made of the site set at Page 16 of Table 3 of the SED. Out of date/inaccurate information has been used to inform assessments. The re-assessment of site STAM14 asserts that "Central part of the site falls within identified flood zones 2 and 3". During the November 2012 Examination Hearings, the environment Agency confirmed that this was not the case. The 1995 Local Plan Inspector in supporting the allocation of the eastern Portion of site STAM14 confirmed that development would not have a significant impact on the local landscape. Assessments have not been undertaken dispassionately. Notwithstanding the NPPF's requirement for local planning authorities to encourage the re-use of previously developed (brownfield) land, and the intention so to do as stated in Spatial Objective 3 of the Council's adopted Core Strategy, the assessments utilise the known difficulties which will be encountered in the re-development of brownfield lands as barriers to possible allocation, e.g. the possible presence of contamination from previous uses.

Please set out what changes to the revised SA/SEA you consider to be necessary:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

SKDC Response:  The inclusion of ADD43 within Table 4 [of the Evidence Document - also Figure 7 of the SA/SEA] reflects the conclusion from the SA/SEA process that the site is not likely to have a significant adverse effect on objectives which cannot be mitigated against. As this is the conclusion of Stage 3 only it does not mean that the site will be assessed in subsequent stages of the process as being suitable for development. Perhaps on closer examination of the SA/SEA assessment, site ADD43 should not have been included within Table 4. Contrary to the claim in this representation the Environment Agency confirmed that the central part of site STAM14 were still identified as Flood Zones 2 and 3. They also confirmed at the hearing sessions that changes to flood zones would only be made AFTER any mitigation work such as that suggested by the objector were implemented. They would not change flood zones unless work had been completed and it was demonstrated that the changes did in fact reduce the area at risk of flooding. The re-assessment work has therefore used the appropriate and up-to-date information in respect of this site. Objective 3 of the Core Strategy does encourage the re-use of brownfield sites. This issues is covered by two separate SA/SEA objectives (Objective 2 and 3) the SA/SEA assessment framework provides the opportunity to identify this as a significant positive effect for those sites which are brownfield. As a result the brownfield land to the east of Stamford (as depicted on plan A5 of the SCOT representation (SASub100) to the submission plan) has been allocated as STM1c and STM2d. The Council is not aware of any additional brownfield land being available for development to the east of the town and the representation does not identify any further areas specifically.
Consultee
260968  Mr Tim Lee
Stamford Chamber of Trade and Commerce

CommentID:  SAPSA46

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:
What did the previous representation relate to:
Which part of the revised SA/SEA does your representation relate to:  Chapter 4
Nature of Response:  Objecting

Reasons for this response:
Having studied the above Report and the Supplementary Evidence Document ('SED'), and the resulting proposed modifications to the Submission SAP, SCOT remains of the view that the 'revised' site selection methodology is just as deficient as the original. It, like the Council's Site Allocations and Policies DPD - Selection Process for Sites and Villages 2012 background paper, has also been produced under duress and with the benefit of hindsight. The modifications made are not a true reflection of the processes and methodologies actually utilised by the Council in its selection of sites for allocation. The outcomes have long been pre-determined. The revisions introduced to the site selection process have been engineered to provide support for those outcomes. On the face of it, the work carried out by the Council appears comprehensive; undertaken in an 'arms length' manner, and subject to both internal and external support, criticism and challenge at key stages. Closer examination reveals otherwise.

Please set out what changes to the revised SA/SEA you consider to be necessary:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

SKDC Response:  The Council considers that the documents it has prepared are transparent and rigorous. The criteria which have been adopted both to eliminate sites regarded as complete non-starters and then to analyse and appraise the potential opportunity sites is clear from the start. Both in the Strategic Environmental Assessment, and also in the additional evidence document which accompanies it, it is very clear to the reader how the choices which the Council have made have been reasoned and justified and from a legal perspective the Council considers these documents to be robust. In the note of the Exploratory Meeting the Inspector drew attention to a commentary on the case of Cogent Land LLP v Rochford DC [2013] 1 P.C.R. 2 prepared by Richard Harwood QC, in which he noted that, notwithstanding the opportunity to provide the Strategic Environmental Assessment at a later stage of the process, that it should not be a paper exercise of ex post facto justification. It is clear that the application of the site selection process and the review which has been undertaken has led to real differences between the document has originally prepared and as modified. It is not therefore possible to say that the process upon which the Council has engaged has been an arid ex post facto justification of the decisions already reached. It has been an exercise undertaken with an open mind as to the outcomes, which are fully explained in the material. The re-assessment work has also been the subject of advice and scrutiny from the Planning Advisory Service (PAS) and the Planning Officer Society (POSe). The representation states that the modifications are not a true reflection of the process or methodologies used. It is unclear how or why the objector believes this to be the case, particularly as the documentation prepared clearly sets out the methodology and processes which have been followed and the conclusions arising from applying the revised methodology.

Consultee
260968  Mr Tim Lee
Stamford Chamber of Trade and Commerce
Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD:

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 6 - Stamford

Nature of Response: Objecting

Reasons for this response:

Once again the Council has failed to consider 'all sites', i.e. irrespective of whether or not a site has been promoted by or on behalf of the landowner. Paragraph 4.1 of its SA/SEA Addendum Report and paragraph 3.1 of its SED makes clear that the Council has considered only "All sites submitted to the Council for consideration for housing development in the towns and the 16 LSCs, and which have been subject to public consultation in either 2009 or 2010 ...", together with "A number of additional sites proposed through representation to the submission plan and which were considered at the examination hearing sessions ...". The failure is confirmed in paragraph 1.1.2 of the Council's Submission (Incorporation Modifications) July 2013. By way of example, the Council has still not undertaken as assessment of the area of land lying to the North of Stamford between Little Casterton Road and Ryhall Road. This area of land, which includes the area identified by the Council as Site ADD43, was assessed by David Tyldesley and Associates in their 2011 Landscape Sensitivity and Capacity Study as Site S4. They found it to be suitable for development in landscape terms; a conclusion with which SCOT's landscape consultations, Munro + Whitten, concurred. Site S4 was not further assessed, e.g. in the transport assessment undertaken on the Council's behalf by Jacobs. This remains the case. Thus the Council's actions are contrary to the decision in Manydown Co Ltd -v- Basingstoke and Deane BC.

Please set out what changes to the revised SA/SEA you consider to be necessary:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

SKDC Response: The whole area of land (referred to as S4 in the SCOT representation) has been considered in the SA/SEA and site assessment as site ADD43 described as West of Ryhall Road / east of Little Casterton Road. The reassessment work has therefore considered this site. This is apparent from the table shown at Appendix 2 [of the Evidence Document] which identifies the site to be over 55ha and refers to potential constraints accessing an extension of the site westwards resulting in traffic accessing the town centre via narrow roads and streets. This table also shows that there has been no confirmation from the land owner about the availability of the site for development. This final point makes the site unsuitable for consideration for allocation at this time. Unfortunately the site name, size and map on page 218 of Section 2 of the Evidence Report have not been updated to reflect the larger site assessed although the SA/SEA summary and the conclusion on this page have been updated (they are the same as the table at Appendix 2). An errata has been published to correct this error (ref: SAP25 in the examination library). None of the site re-assessments have used information from the Jacob's Traffic Modelling. It is, therefore, irrelevant that this site has was not included in that modelling report.
Reasons for this response:
The Greater Lincolnshire Nature Partnership for South Kesteven, we also co-ordinate the Lincolnshire Biodiversity Action Plan. The wording states that: "SKDC will continue to deliver the objectives and associated actions set out in the Lincolnshire Biodiversity Action Plan". However, South Kesteven is not signed up to contribute to the BAP. Indeed it is one of the only local authorities in our area that is not contributing to the BAP, yet throughout the SA/SEA the writing implies that it does.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The tone of the document needs to be altered to: 1) say that SKDC will (future tense) contribute to the BAP, if that is their intention Or 2) if SKDC do not intend to contribute to the BAP then reference should state they encourage developers and others to contribute to it (please note that we believe not contributing to the BAP has impacts on SKDC’s ability to fulfil the NERC duty).

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

SKDC Response: The SA/SEA report acknowledges that projects should contribute towards the objectives of the BAP. The report does not imply that SKDC is a contributor towards the preparation of the BAP. Table E clearly identifies that the BAP is a document to be taken into consideration when assessing sites.

Consultee Agent
777611 Miss Fran Hitchinson
Greater Lincolnshire Nature Partnership
CommentID: SAPSA6

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:
Which part of the revised SA/SEA does your representation relate to: Chapter 5, Table F paragraph 1

Nature of Response: Objecting

Reasons for this response:
The Greater Lincolnshire Nature Partnership for South Kesteven, we also co-ordinate the Lincolnshire Biodiversity Action Plan. The wording states that: "SKDC will continue to deliver the objectives and associated actions set out in the Lincolnshire Biodiversity Action Plan". However, South Kesteven is not signed up to contribute to the BAP. Indeed it is one of the only local authorities in our area that is not contributing to the BAP, yet throughout the SA/SEA the writing implies that it does.

Please set out what changes to the revised SA/SEA you consider to be necessary:
The tone of the document needs to be altered to: 1) say that SKDC will (future tense) contribute to the BAP, if that is their intention Or 2) if SKDC do not intend to contribute to the BAP then reference should state they encourage developers and others to contribute to it (please note that we believe not contributing to the BAP has impacts on SKDC’s ability to fulfil the NERC duty).

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

SKDC Response: The SA/SEA report acknowledges that projects should contribute towards the objectives of the BAP. The report does not imply that SKDC is a contributor towards the preparation of the BAP. Table E clearly identifies the BAP as a document to be taken into account when assessing policies.
Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership

CommentID: SAPSA7

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 1

Nature of Response: Commenting

Reasons for this response:

The Greater Lincolnshire Nature Partnership for South Kesteven, we also co-ordinate the Lincolnshire Biodiversity Action Plan. If contributing to the BAP is a key issue as mentioned in paragraph 1.22 why is South Kesteven not signed up to contribute to the BAP? Indeed it is one of the only local authorities in our area that is not contributing to the BAP, yet throughout the SA/SEA the writing implies that it does.

Please set out what changes to the revised SA/SEA you consider to be necessary:

The tone of the document needs to be altered to: 1) say that SKDC will (future tense) contribute to the BAP, if that is their intention Or 2) if SKDC do not intend to contribute to the BAP then reference should state they encourage developers and others to contribute to it (please note that we believe not contributing to the BAP has impacts on SKDC’s ability to fulfil the NERC duty).

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

SKDC Response: Appendix 1 comprises outlines of key plans and programmes which are relevant when preparing Sustainability Appraisals. Inclusion of the Lincolnshire Biodiversity Action Plan among the local plans and programmes does not imply that the Council is contributor towards its preparation; it acknowledges Council supports for its objectives and identifies its relevance when assessing sites for allocation for development.

Consultee  
777611  Miss Fran Hitchinson  
Greater Lincolnshire Nature Partnership

CommentID: SAPSA8

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: No

What did the previous representation relate to:

Which part of the revised SA/SEA does your representation relate to: Appendix 2

Nature of Response: Objecting

Reasons for this response:

The Greater Lincolnshire Nature Partnership for South Kesteven, we also co-ordinate the Lincolnshire Biodiversity Action Plan, co-ordinate the Local Sites system, operate the Lincolnshire Environmental Records Centre and co-ordinate the Geodiversity Strategy. Because of our knowledge in this area, it is clear to us that the information described in the 'Biodiversity and Landscape' section of Appendix 2 uses out of date information. If this is the information that has been used to inform the SA/SEA then the whole
document is flawed and erroneous. Under Section 13 of the Planning and Compulsory Purchase Act planning authorities should be aware of the environmental characteristics of their area which may affect development or the planning of development. This plan is clearly not aware of the up-to-date environmental characteristics. Under the Strategic Environmental Assessment Directive all Environmental Impact Assessments must contain a description of the environment including flora and fauna, this Assessment does not comply as the data is out-of-date.

Please set out what changes to the revised SA/SEA you consider to be necessary:

The SA/SEA needs to include up-to-date information on the biodiversity of the area, including information on habitats and species from the Lincolnshire Environmental Records Centre and information on Local Sites (including Local Wildlife Sites, Local Geological Sites - the modern counterparts of SNCIs and RIGSs). This may require all the village assessments, and proposals to be rerun as there are a number of new sites and more information on habitats and species.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

No

SKDC Response: Information was obtained from Lincolnshire Wildlife Trust in 2005 which detailed all wildlife sites within the District - categorised into types of site. This provided the baseline data for the SA/SEA of the Council’s plans. The baseline data has been updated regularly, using publicly available information from sources such as Natural England and LWT. Where nothing further has been found in respect of specific sites then the original data has been used. Information on the condition of SSSIs has been obtained from Natural England’s website, LWT nature reserves information from LWT website. The SA/SEA baseline data uses the latest information which was available at the time of the revision/updating: late 2012/early 2013. The sources are acknowledged in the report.

Consultee

372928 Mr Tom Gilbert-Wooldridge

English Heritage

CommentID: SAPSA9

Does the revised SA/SEA affect or alter a previously made representation to the SAP DPD: Yes

What did the previous representation relate to: Site allocation in Harlaxton

Which part of the revised SA/SEA does your representation relate to: Chapter 3: Methodology for assessing suitability of 16 LSCs for allocation

Nature of Response: Objecting

Reasons for this response:

We welcome the revised methodology for assessing the suitability of the 16 Local Service Centres (LSCs) as set out in Chapter 3, which follows a more rigorous approach and takes heritage impacts into full consideration. This has helped to reveal that Harlaxton is less suitable for development than other LSCs and that the heritage issues for the village act as a considerable constraint. However, with regards to the SA Framework in Table A, the wording for SA Objective 9 relating to the historic environment is inadequate and not consistent with the wording used in the other two SA Frameworks later in the document. The decision-making criteria ask “is there an important cultural or heritage asset within or near the village [etc]” without defining what is meant by an “important” asset. Furthermore, the criteria refers to a settlement being “within the Belton House Setting Zone”, when it is clear from the Statement of Common Ground signed between the Council, English Heritage and the National Trust that such a definition is misleading (and has resulted in three post-hearing main modifications PHMM41 to PHMM43). Therefore, the wording should be altered to: “Is the settlement within the setting of a registered park and garden (using the Belton House & Park Setting Study where appropriate)?” This would be consistent with the SA Framework for site selection (Table E). The wording used for the “significant adverse effect” for SA Objective 9 is perhaps slightly too severe. Even in a village like Harlaxton, it would be wrong to say that “any development... would result in a negative impact...”, as there may be some (small) sites that could be developed without harm, and it would depend on design issues in some cases (although for clarity, development of HARLO6 would result in a negative impact regardless). It might be better to say “significant adverse effect as development in
the village is likely to result in a negative impact on [etc]...”

Please set out what changes to the revised SA/SEA you consider to be necessary:

Suggests two minor amendments to wording of Objective 9 in Table A: decision-making criteria to read “Is the settlement within the setting of a registered park and garden (using the Belton House & Park Setting Study where appropriate)?” and “significant adverse effect” to read “significant adverse effect as development in the village is likely to result in a negative impact on [etc]...” These will make Table A consistent with site assessment Table E.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

SKDC Response: Agree the wording suggested would provide consistency and clarity of the assessment process. If amended the wording change would not, however, result in an amended assessment for either Harlaxton or Castle Bytham, which are the only two villages where a "significant adverse effect" has been noted for this Objective.