## English Heritage

- Request that designated cultural heritage assets are quantified in paragraph 2.46.
  - Cross reference to Cultural Heritage part of Annex B.
- Request that the scoping report acknowledge the much greater number of heritage assets that are included in the Greater Manchester Historic Environment Record.

- Include reference to Greater Manchester Historic Environment Record in paragraph 2.46.

• Request that certain types of cultural assets that are particularly at risk from flooding receive particular attention in the SEA. These would include weirs, dams, wharfs and jetties, canalside warehouses, and mills.

- Include general reference in paragraph 2.46 that certain types of heritage assets are at risk of flooding due to their historical purpose.

• Request joint assessment of natural and cultural heritage management for wetland sites such as Carrington Moss and Chat Moss, that are known to contain nationally important evidence of human activities, past environments and habitats, and past climate conditions; re-wetting of the land may have environmental benefits but could harm cultural heritage.

- Include reference to joint assessment of natural and cultural heritage management for specific wetland sites in paragraphs 2.13 - 2.16 and include reference to known hidden cultural heritage in specific peatland areas.

## **Canal and River Trust**

- Promotes the CRT website.
  - No action required.
- Request that the Canal Network is included as part of the Infrastructure and Material Assets section, alongside roads, railways etc. Section 2.41 to 2.44 inclusive, omits the Canal Network as part of Infrastructure and Material Assets? Whilst Canals are a source of Flood Risk they are also part of the Infrastructure within the Area and we consider they should be considered alongside the roads/ rail etc...

- Include reference to the Canal Network in paragraph 2.41 and Map 3 in Annex B, dealing with Transport Infrastructure.

- Request that the objective 'Protect and where possible enhance townscapes and cultural heritage' is reworded to 'Protect and where possible enhance townscapes, cultural and industrial heritage' to allow area's around the Canal Network, particularly the Bridgewater Canal, England's First Canal, as an entire body / entity in its historic context to be included alongside listed buildings etc.
  - Industrial Heritage is implicitly addressed by the existing term Cultural Heritage, however, no objection to the request.
  - It is worth noting that the CRT is not the Navigation Authority for the Bridgwater Canal (so no specific wording changes will be undertaken in relation the Bridgwater Canal), but the general point would relate to all historic broad canals.

## Appendix A – SEA Scoping Report consultation summaries

• Request consequent amendments to the draft SEA Objectives in Infrastructure and Material Assets and Cultural Heritage sub-sections and in Section 3.

- This does not seem necessary; the existing draft SEA objectives would also apply to canal network.

## **Natural England**

• Considers that the Strategic Environmental Assessment (SEA) Scoping report of the Flood Risk Management Strategies **complies** with the statutory requirements set out in European Directive 2001/42/EC and The Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

- No action required.

### Habitat Regulations

- Advises that the most up to date regulation, regarding the requirement for an Appropriate Assessment is Regulation 61 of the Habitat and Species Regulations 2010 as opposed to Regulation 48(1) of the Conservation (Natural Habitats, &C) (Amendment) (England and Wales) Regulations 2006.
  - Noted, paragraph 1.8 will be amended accordingly.
- Advises that the UK Government has signed the Ramsar Convention (1971, and with subsequent amendments), which means parties have agreed to establish and protect wetlands of international importance. The UK Government has stated that, as a matter of policy, listed Ramsar sites should be afforded the same level of protection as Special Protection Areas (SPAs) or Special Areas of Conservation (SACs).

- Noted, paragraph 1.8 will be amended accordingly.

 Advises that whilst most Ramsar sites are also SPAs and can often be SACs, it is necessary to consider the specific interest features of Ramsar sites in any consideration of potential effects upon the site, because interest features can differ between the designations.

- Noted.

• Advises that the Scoping Report highlights a number of relevant issues some of which are linked to other areas such as health and well being and economic factors. The resolution to some of these issues may have an effect on the designated sites in which case they will also have to be considered under the Habitats Regulations.

- Noted.

## <u>Methodology</u>

- Advises that the methodology is covered in the scoping report. The key to the process is a systematic analysis of the potential effects of the Plan's objectives and actions. A standard matrix approach as suggested should help to match the Plan to the SEA objectives. The following stages should then be considered as part of Developing and refining alternatives and assessing effects;
  - Developing strategic alternatives
  - Predicting the effects of the strategy including alternatives

## Appendix A – SEA Scoping Report consultation summaries

- Evaluating the effects of the strategy including alternatives
- Mitigating adverse affects
- Proposing measures to monitor the environmental effects

   Noted.
- Advises that it is important to factor in the use of indicators in the Methodology. The use of indicators will monitor the success of the SEA objectives. They will help assess the impacts of the Plan and its actions as well as provide an indication of the level of sustainability achieved by the Plan and will provide an indication of the need for further enhancement or mitigation measures within the Plan. This will be an iterative process to ensure that Plan, if refined to improve performance against sustainability objectives, does not then have an adverse effect on the environment. Below is a suggested indicator which could be of use as the SEA progresses.
  - Protected species Quantified data might include numbers of flood risk related applications where protected species are considered, numbers with conditions imposed to ensure working practices and works to protect/ enhance protected species, and numbers of planning applications which result in need for protected species licence in order to be carried out. This will indicate that protected species are being given appropriate consideration within the planning system and begin to build up information on their occurrence within the plan area.
     Noted.

#### ANNEX A: Review of Plans and Programmes

- Advises that this should include reference to Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000.
  - Noted, Annex will be updated accordingly.

# Peel Holdings / Manchester Ship Canal Company / Bridgewater Canal Company

 Peel Holdings advised that it would be better to contact the Manchester Ship Canal Company, and the Bridgewater Canal Company directly.
 -Noted.