GLNP
GREATER LINCOLNSHIRE
NATURE PARTNERSHIP

East Lindsey District Council
Tedder Hall
Manby Park
Louth
LN11 8UP

7 April 2017

Dear Ms Shorland

Thank you for your letter dated 8 March explaining the process for the next stage of the Local Plan. We believe that in three areas the modifications made by the Council have ameliorated our concerns, however in two areas it appears that formatting has been lost and the suggested modifications are confusing. We detail these points below.

In addition the GLNP believes that the Council's response to one of our specific objections is factually inaccurate. We would be grateful if you would address this point and included it within the materials sent to the Inspector.

Overall we maintain our objection to the Local Plan. If you would like to discuss any of the areas outlined below in more detail please do not hesitate to contact me.

Yours sincerely

Fran Smith

Nature Partnership Manager

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Resolved specific objection

The GLNP supports the changes proposed for SP24, in that it will now reference Nature Improvement Areas. The GLNP considers this specific objection resolved.

(Page 355 of the Committee report, responses to comments and modifications)

Areas of lost formatting within the modifications

There are two points under this heading.

Paragraph 4 of SP24

We are pleased that the Council agreed to include our amendments to the paragraph to add clarity. However on translating this into the modification text column all the additions and deletions from the response have been transposed, reducing the clarity instead.

Text with additions and deletions suggested by GLNP in response:

4. There are a number of sites recognised at a local level for their nature conservation or geological value. These sites have been identified for features including their rarity, diversity, fragility or their typicalness in the local biodiversity or geodiversity of the District. The Council will seek to protect these sites when assessing development proposals. ~~A set of criteria for selecting Local Geological Sites (LGSs) for their physiographical/geomorphological importance was published in 2009 and a similar exercise is being considered for these sites. Many sites recognised at a local level for their nature conservation or geological value have already been reviewed against the new criteria.~~ The ~~locally~~ important ~~wildlife~~ sites that meet the selection criteria published by the Greater Lincolnshire Nature Partnership are called Local Wildlife Sites (LWSs) or Local Geological Sites (LGSs). There remain sites from the previous regime of designation, Sites of Nature Conservation Importance (SNCI) and Regionally Important Geological Sites (RIGS), which have not yet been tested against the ~~new~~ criteria published by the GLNP. Until such time as these sites have been resurveyed and an assessment made of their current ability to meet the criteria, these sites remain designated and this policy still applies to them.~~"~~

Clean version of text to add into the Local Plan:

4. There are a number of sites recognised at a local level for their nature conservation or geological value. These sites have been identified for features including their rarity, diversity, fragility or their typicalness in the local biodiversity or geodiversity of the District. The Council will seek to protect these sites when assessing development proposals. The important sites that meet the selection criteria published by the Greater Lincolnshire Nature Partnership are called Local Wildlife Sites (LWSs) or Local Geological Sites (LGSs). There remain sites from the previous regime of designation,

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Sites of Nature Conservation Importance (SNCI) and Regionally Important Geological Sites (RIGS), which have not yet been tested against the criteria published by the GLNP. Until such time as these sites have been resurveyed and an assessment made of their current ability to meet the criteria, these sites remain designated and this policy still applies to them.

If this clean version of the text, rather than that shown in the modifications column, is included in the Local Plan the GLNP will consider this specific objection resolved

(Page 355-356 of the Committee report, responses to comments and modifications)

Paragraph 2 of SP24

We are pleased that the Council agreed to include our amendments to the paragraph to add clarity. However on translating this into the modification text column all the additions and deletions from the response have been transposed, reducing the clarity instead.

Text with additions and deletions suggested by GLNP in response:

~~The UK Biodiversity Action Plan~~ Biodiversity 2020 highlights the need to reverse this decline …

Clean version of text to add into the Local Plan:

Biodiversity 2020 highlights the need to reverse this decline

If this clean version of the text, rather than that shown in the modifications column, is included in the Local Plan the GLNP will consider this specific objection resolved

(Page 359 of the Committee report, responses to comments and modifications)

Point of factual inaccuracy

The GLNP is disappointed to note an area of factual inaccuracy and areas where the text may be misleading. We refer to the "VARIETY OF SITES COMMENTS MADE BY GREATER LINCOLNSHIRE NATURE PARTNERSHIP AND LINCS WILDLIFE TRUST" on page 426 of the Committee report, responses to comments and modifications. Council's response here refers back to their response on a similar point made by the Wildlife Trust.

The GLNP appreciates the time taken by the Council to respond and the significant time and budgetary pressures the Council is under. However we believe it is important that points are addressed, corrected and that the Inspector is made aware of them.

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Council's response	GLNP response to the response
The Lincolnshire Wildlife Trust (The Lincolnshire Trust at the time) notified the Council of the sites to be protected as Sites of Nature Conservation Importance in 1993. This notification came in the form of two books of maps showing the sites.	
Although there was reference to other sites that the Trust held information on, these two books of maps were the only sites notified to Council and have formed the Council's list of SNCIs for the last 23 years. None of the sites referred to as SNCIs in this representation are in the books and so have never been considered under the SNCI policy by the Council.	We believe this point is inaccurate. The Council's list of SNCIs has been significantly updated in the last 23 years. It is understood that the Lincolnshire Wildlife Trust sent updated data from 2005 onwards. In addition the Council reviewed many of its SNCIs under new planning policy and re-designated them as LWSs from 2008 onwards. This was a project achieved in partnership with the Lincolnshire Wildlife Trust and the Lincolnshire Biodiversity Partnership (the previous name of the GLNP). Evidence for these updates can be seen in the presence of LWSs within the emerging Local Plan as these have only been designated from 2008 onwards. At this time the Council held a SLA with the Partnership to maintain and update its data on an annual contract basis as this was considered cheaper and more effective than an in-Council solution to data management. As part of this SLA the Council received GIS updates of Local Sites.
Should any of these sites been reassessed against the criteria for a Local Wildlife site, they will be considered accordingly.	We believe this point is misleading. It gives the impression the Council currently has the capacity to undertake this. When the Council cancelled its SLA with the Partnership in 2010 they do not appear to have maintained up to date data, suggesting that the Council do not have the in-Council expertise to consider new sites that meet the criteria.
The respondent has queried a number of sites on the grounds that there is something marked on the plan but it is not clear what. In all cases, these are SNCIs which the Council has retained on the plan as it has not been notified that the site has passed through the panel as a LWS.	Thank you for resolving this point, however ii could be construed as misleading. In the cases where the GLNP queried what was shown on the maps it was specified that there was no appropriate map key for the item.
Stickney Picnic Site was an SNCI resurveyed under a piece of work commissioned and paid for by the Council. It was slightly short of meeting the criteria for a LWS but additional work was required	This statement appears to match our understanding, however we believe it is still a SNCI and should be marked as such on the map – our representation highlighted the lack of an appropriate map key
For Woodhall Spa Meadow the last information the Council had was that the decision was	This statement appears to match our understanding, however we believe it is still a

deferred from the Panel on boundary grounds.	SNCI and should be marked as such on the map – our representation highlighted the lack of an appropriate map key
At Roughton Moor there was an issue with the landowner which remained unresolved	This statement appears to match our understanding, however we believe it is still a SNCI and should be marked as such on the map – our representation highlighted the lack of an appropriate map key
At Saltfleet Warren Road Dunes, the site met the criteria but a final boundary haad not been determined. The fact that this doesn't appear on the key needs addressing in the final document.	This statement appears to match our understanding, however we believe it is still a SNCI and should be marked as such on the map – our representation highlighted the lack of an appropriate map key
In respect of the Local Wildlife Sites the Council has included on its maps any sites it has been notified have been considered successfully by the Wildlife Sites Panel.	
However, the Greater Lincolnshire Nature Partnership, who act as custodians of the data will not disclose the information without the Council either paying an annual subscription to join the Partnership or paying for individual site information as a developer would, and the Council has no budget for this.	We believe this is inaccurate and misleading. The GLNP offer a data management service to local authorities in order to help them achieve their duties. If the Council do not wish to take up this service we would suggest they should ensure they have adequate expertise and staff budget in-Council to meet their duties. All other Councils in Greater Lincolnshire have chosen to enter into an agreement with the GLNP as it is more cost effective than in-Council staff. The Council will have paid for numerous other technical surveys and services during the preparation of the plan and will continue to do so a part of ongoing monitoring and fulfilling its duties. This is no different.
The Council has sought information on the location of sites but this was declined without payment.	We believe this is misleading. Rather the Council refused to pay stating the GLNP should supply the information free of charge. This is despite the previous SLA in which it was understood that this was a service.
The payment would only cover one year, under the terms of any release of data, and the Council would not be allowed to use it beyond that year so it could not be included in the Plan.	We believe this is inaccurate. The data can only be kept on a GIS or other digital system for a year. This is because the data is updated and changing and an annual update is required for the data to remain up to date. If the site boundaries were printed in the Local Plan this would be acceptable, as it is with every other local authority in Greater Lincolnshire and with all the commercial planning enquiries we undertake.

The Council has plotted the sites it is aware of, a significant number of which it paid for the survey work on in 2008/09.	We believe this is misleading. The GLNP has made the Council aware of a number of sites it has not plotted through email, telephone conversations and formal consultation responses. The Council has failed to gain the information.
Hubbard's Hills LWS is shown on the inset map, but the site is also shown as Protected Open Space.	This is somewhat inaccurate as the map on page 78 of the Settlement Proposals does not show a LWS boundary. Small portions of the LWS boundary are visible when they are not overlaid with the Protected Open Space designation. It would be more helpful if all the designations were clear. This includes the RIGS designation that also applies to the site. As there is no map key for RIGS it is unclear how this would be displayed currently.
The Council is proposing a minor modification to the Local Plan in that it will list the sites in the text for each corresponding settlement in the Settlement Proposals part of the Plan so that developers are aware that they should contact the Greater Lincolnshire Nature partnership for more information should they be considering proposals in those locations.	We believe this is inaccurate. The modifications proposed do not mention that anyone should contact the GLNP for information. The modifications simply state the sites missing from the plan.

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