

| Item Number | Submission ID | Date Master raised | Criteria Heading | Criteria sub heading | Document Reference | Comment | Action Required | Timing of Draft | Comment provided by | Date Response Provided | Response | Section Amended (New para nos and Table nos used in this column) |
|-------------|---------------|--------------------|------------------|----------------------|--|---|---|-----------------|--|------------------------|---|--|
| 1 | | 23-Apr-10 | Technical | Boundaries | Main Report Chapter 4 | When considering the POZs at the boundaries of SMP numbers 16 and 18, it is unclear if the choice considers the adjacent units from those neighbouring plans. | Can the team please explain and add further text as required? | Review of Draft | Jim Hutchison | JR 13/08/2010 | 703 Hartland Point to Clowely policy is NAI / NAI / NAI. 18.5 Cawsand to Rame Head is NAI / NAI / NAI. These both fit with our policies at the start of PDZ1 and end of PDZ17 respectively. Have added text to the relevant PDZ sections to clarify this (PDZ1 on page 12 & PDZ17 on page 11). | |
| 2 | | 23-Apr-10 | Technical | Boundaries | Main Report Section 3.4 and Figure 3.2; Ch 5; Appendix C Estuaries Report | There is inclusion of estuaries in some POZs. Some of the estuarine boundaries are further upstream than when SMP1 was prepared. It is unclear if the estuarine boundaries are in line with the SMP Volume 2 Guidance Note, or if the locations have been chosen for other reasons, e.g. to marry up with the boundaries of other high level plans, e.g. Catchment Flood Management Plans? Do (or should) CFMPs cover all of these estuaries, and what does the SMP2 state about a better or more natural boundary for any updates? [JH] The Estuaries Report notes the existence of relevant CFMPs, and that it is important to be aware of policy decisions made as part of the CFMP to avoid conflicts. This is a useful flag but it is not clear a) the status of the CFMPs b) how the CFMP policy decisions are drawn into the decision making process for SMP Policy Units. Also, it would be helpful to see the CFMP locations and boundaries on a map. [SJ] | Can the team please clarify and add additional text as required? Also where future boundaries might best be located in these estuaries? [JH] Could the Project Team please: - add some text to explain the status of CFMPs (eg. whether approved), how any gaps or overlaps are dealt with, the compatibility of policy options and whether there are any issues to resolve that will need to be included in the Action Plan? - add a map to show the location of the CFMPs in relation to the SMP? [SJ] | Review of Draft | Jim Hutchison Steve Jenkinson | JD 09/08/2010 | Text added to Chapter 3 as follows "Catchment Flood Management Plans (CFMPs) are in place for the whole of the SMP2 area (excluding the Isles of Scilly) and consider fluvial, pluvial and still water tidal flood risk now and in the future in order to set policies for managing the risk on a catchment basis. The CFMPs that cover the SMP2 study area are West Cornwall CFMP, East Cornwall CFMP, Tamar CFMP and North Devon CFMP, the boundaries of which are shown on Figure 3.2 below. The CFMPs were adopted by the Environment Agency in 2006. MAP inserted The CFMP policy unit boundaries and the Appendix F Estuaries Assessment (Appendix C) have been considered to some extent in determining the POZ boundaries in relation to the upstream extent on estuaries. The Estuaries Assessment is presented in Appendix C. This was undertaken for the Fal, Fowey and Camel estuary to determine the upstream extent of the estuary for SMP2 consideration in accordance with the Defra Appendix F assessment guidelines. The approach to determining the upstream extent of the POZs has been driven however by the Client Steering Group who requested that each estuary was considered to its normal tidal limit, including the Fowey, Fal and Camel estuaries. This was in order to ensure the SMP2 was able to provide guidance on pressures and management of the Special Areas of Conservation (SAC) present on the Fal and upper reaches of the Camel estuary. Extending the boundary on the Fowey This is beyond the upper boundary determined by the Appendix F assessment and SMP1 coverage in some locations. This means that there are now no areas within the study area which are not covered either by SMP2 or CFMP policy to ensure. Within the study area there is an overlap with SMP2 and CFMP coverage at key communities, because tidal flood risks have been given some consideration within the CFMP. As such there could be conflicts in the intent of management and p Chapter 5 presents a comparison between the SMP2 Preferred Plan and the CFMP policy where a specific action to implement the CFMP Policy option is published in the CFMPs for Tamar Catchment, East and West Cornwall and North Devon. | 3.4.1 |
| 3 | | 23-Apr-10 | Technical | Coastal Processes | Appendix C Coastal Processes | Whilst a significant proportion of the cliffs are resistant and subject to low erosion rates, there are areas where the current erosion risk is described variously as slips, rock fall, debris sliding, erosion of head deposits etc. However, it's not clear if the risk is erosion as defined by the Coast Protection Act (CPA), or whether other external factors such as groundwater are the cause. | Can the Project Team define, in simple terms, which areas of cliffs are impacted by erosion and where the primary drivers are other mechanisms, and where known, what these are? Following on from this, it will be helpful for data to be provided setting out landowners where non CPA mechanisms are active, and what funding sources might be appropriate where actions are required. | Review of Draft | Steve Jenkinson | JR 10/08/2010 | Ok. Have added the following explanation to Appendix C. The great majority of cliff recession around Cornwall and the Isles of Scilly occurs due to a combination of direct coastal erosion from wave impacts and general weathering of the cliff face due to the maritime climate. Slips, falls, debris slides etc are generally mechanisms of failure dictated by the geological make-up of the cliff and position of faulting, with coastal erosion and weathering driving this process. Coastal processes also drive the removal of material from the base of cliffs and subsequent re-distribution on the foreshore. There are no specific known areas where groundwater or surface water run-off is the main driver of erosion. These factors are however thought to be contributory factors at locations such as Downderry, Gunwalloe, Praa Sands and particularly Godevay where softer head deposits are found. We do not have a full database of landowners to cover all of the cliff areas at risk but there are examples such as private home-owners at Downderry, Breage Parish Council at Praa Sands and the National Trust at Gunwalloe and Godevay, W | Appendix C, pp 11 / 12 plus reference to landowners/funding in Action Plan |
| 4 | | 23-Apr-10 | Technical | Coastal Processes | Appendix C, NAI/WPM Assessment | There is no information or indication on the rate of cliff recession potential and how this changes between epochs. Statements such as 'cliff retreat will increase' are very vague and give no indication of the changing nature (or otherwise) of the erosion risk over time. This is important information in these baseline assessments and should be included here to provide the evidence linkages to the erosion information in the POZ reports in Section 4 of the main document, particularly as there are no maps showing erosion risk under NAI scenario to support this assessment. | Add recession data to the NAI/WPM assessments to demonstrate erosion risk and how this changes over time. | Review of Draft | Andy Parsons | MW 09/08/10 | We can see the reasoning behind the suggestion, but believe that, on balance, the suggested change would not improve the document. We have two reasons for this, (1) the recession data is already in the SMP, in several complementary forms and (2) to make the tables more explicit would seem to require a substantial expansion of supporting information. Information on recession distance is already included in the SMP three forms: (1) as explicit distances in the POZ documents, (2) as maps within the document for all key locations, and (3) freely available electronic interactive maps for the whole SMP area (which include a measurement tool). We do not feel that including the data in a fourth form, explicit distances within the Appendix C tables, would be particularly beneficial. The suggestion is that these are needed to provide an 'evidence link to the pdf documents. We feel that this is a key purpose of the mapping. Statements such as 'cliff retreat will increase' are not necessarily vague, they are statements of what can reasonably be expected. More precise statements could be made such as 'cliff retreat will increase by between 10 and 30 %', but these would require a substantial amount of additional supporting information. Each unit in the table is composed of around five different subunits, each of which was the subject of a separate assessment of recession. Consequently much data is the | No change |
| 5 | | 23-Apr-10 | Technical | Coastal Processes | Main Report Ch.4; Appendix H | Sect H.3 notes that numbers of properties at risk have been determined by assessing the maximum flood and erosion extents under No Active Intervention, and that sea level rise has been considered in the production of these extents and therefore is taken into account in the damage assessment. Baseline erosion rates are tabulated in each POZ in Ch.4, but I cannot find any discussion on the methodology adopted for assessing flood risk extents. | Could the Project Team clarify where in the SMP the approach to assessing flood extents is presented, including clarification as to whether EA's indicative flood plain mapping was used? | Review of Draft | Steve Jenkinson | MW 09/08/10 | 3.1.3 Future flooding and shoreline change Two key technical elements of the SMP process are projections of future shoreline position (essentially coastal erosion) and flood boundaries. It is proscribed that these be assessed in three epochs representing, nominally, 2025, 2050 and 2105. Two possible approaches to coastal management must also be accounted for, termed 'No Active Intervention' (NAI) and 'With Present Management' (WPM). These represent situations under which managers do not seek to further influence the natural course of events (NAI) or decide to maintain the current standard of defence (WPM). The descriptions below relate to the coast within the SMP area and also to those estuaries that were deemed to have relatively low dynamics. The more responsive estuaries, the Fal, Camel and Fowey, were studied by ABPmer, as described in Appendix C. Future flood outlines Future flood outlines were required to inform assessment of future flood risk and habitat change. The flood risk assessment was based on estimation of the extent of future floods at the 1:200 year level, whilst habitats assessment utilised mapping of two tidal stages, mean low water spring (MLWS) and mean high water spring (MHW5), and also the 1:1 year extreme water level. These data were provided for primary locations throughout the region by Postford Haskoning (2003). Other locations were obtained through simple linear interpolation, based on coastline distance between the primary locations. It was not nec Before estimating future flood and erosion hazards it was first necessary to predict sea level rise. Defra (2006) describes how this should be done, and their method provides the following results: - 2025 - 0.06 m - 2050 - 0.20 m - 2105 - 0.93 m Flood outlines were obtained at each of the three epochs using the following procedure: - water levels obtained from Postford Haskoning (2003) were increased by the expected sea level rise associated with each epoch, - resulting levels were projected onto the coastal boundary of a three-dimensional model of the land surface, which was provided by the EA, and created through LIDAR surveys, - the resulting contour lines were captured as digital GIS files for subsequent mapping, - these maps were later used to determine where assets would become vulnerable to future flooding, and how intertidal habitats areas might develop. Future recession change | 3.1.3 |
| 6 | | 23-Apr-10 | Technical | Data and Mapping | Main Report Ch.3 p3 first para. | This section notes that coastal monitoring has recently started. I have not seen any further references to coastal monitoring, particularly the Regional Monitoring. | Could the Project Team clarify where the use of regional monitoring programme data in the development of the SMP is referenced? Also, what actions will be included within the Action Plan to ensure that links with the programme will be maintained and developed so that data will be used to inform updates to the SMP, for example? | Review of Draft | Steve Jenkinson | JR 28/07/2010 | Text amended to state "Coastal monitoring within the study area at specific locations as and when required has been ongoing for some time. More recently a Regional South West Coastal Monitoring programme has been established to undertake coastal monitoring on a more consistent and wide-ranging basis. Over time this will build up a valuable picture of change along the coast, however at this stage the data is too limited to draw trends and conclusions from to inform this SMP. Coastal monitoring data for the SMP2 area and all of England is freely available from the Channel Coastal Observatory website at www.channelsea.org". Therefore Regional Coastal Monitoring data has not been used to inform the SMP and therefore no reference required. Draft action plan has now been completed for NGRO review and this states monitoring requirement actions where appropriate. | Chapter 3 |
| 7 | | 23-Apr-10 | Technical | Data Issues | General | It is important that as much as possible of the high level data that has been collected and used to inform the development of the plan is presented clearly, for example in summary tables. This is partly to provide an audit trail and partly to inform high level reporting eg. national summaries. This will include key data and assumptions covering areas such as policy unit data (lengths, co-ordinate data, policy by epoch), process assumptions and economic data. | Could the Project Team consider the addition of data summary tables where these are not already provided, including the provision of any high level data collected but not presented in the plan? This is not a request for additional data collection, but simply ensuring that best use can be made of existing data. | Review of Draft | Steve Jenkinson | JD 04/08/2010 | We accept the need to present and source as much of the data that has been used within the SMP2 - We have now added the bibliographic database in Appendix K (which was not included in the draft sm). Appendix A (section A4.3) lists the data used within the SMP and refers the reader to the bibliographic database provided in Appendix K. | Appendix K |
| 8 | Shoreline | 23-Apr-10 | Technical | Data Issues | Main Report Chapter 4; Appendix C Defences Assessment; Appendix C Estuaries Report | When discussing the various POZs in Chapter 4 it is unclear where the condition of flood and coastal assets are discussed, or cross referenced? Has NFCCO been used, and if so which date base? If not, how has the residual life of these defences been established? [JH] App. C discusses existing defences but I have only seen limited reference to NFCCO data (App.H). Also, the Estuaries Report notes that defence data was not available at the time of report preparation, so the defence assessment could not be undertaken. [SJ] There is no indication on where the information contained in the defence assessment has come from. Also, this is more of a description of defences not an assessment, as there is no information on the condition or residual life of the defences. This information should be in this appendix as it forms a key part of the assessment of NAI. [AJ] | Can the team please clarify and add text or cross referencing as appropriate? [JH] Could the Project Team clarify what defence data is provided in this SMP, and where? Was NFCCO used to assess risks and inform policy option selection, and if so which version date? Has the defence assessment missing from the Estuaries Report been undertaken? [SJ] Add in where defence information has come from (NFCCO Site visits? Etc). Also, add in detail on defence condition and residual life. [AJ] | Review of Draft | Jim Hutchison Steve Jenkinson Andy Parsons | JR 10/08/2010 | NFCCO data were supplied by the EA for the entire coastline. The spreadsheet provided was an updated version for May 2009 and included asset condition inspection entries for survey carried out up to March 2009. These spreadsheet data were used as a basis for creation of the 'Defences Database' which is included as a deliverable with the GIS Viewer. (Therefore the attribute table which sits behind the GIS database provides a tabulated data set listing the defences). A checking exercise was then undertaken against the position of known assets. NFCCO was generally well populated for Cornwall and the Isles of Scilly but there were some structures not listed and in some cases residual life values are missing. Therefore using a combination of local knowledge, site visits and remote inspection using aerial photography enhancements have been made to the originality submitted NFCCO data set to add any missing structures and estimate residual life values. These enhancements are therefore brought into the SMP Review via the GIS Viewer and the defences database but also through the baseline scenario mapping exercise, where this improved dataset provided the basis for the spatial defence location and residual life. Site visits have also provided added value in the form of photographic records which have been used within Appendix C and within the Chapter 4 POZ documents to assist with descriptions of | Appendix C, Defences Assessment, ppt. |
| 9 | | 23-Apr-10 | Technical | Data Issues | Main Report Section 3.1; Appendix C; Appendix H | Within the context of uncertainty I would have thought mention or a cross reference to climate change would be appropriate in Ch. 3. Also, I assume that the Defra October 2006 data was used in the context of this plan, and I assume that this is referenced and perhaps further cross referencing is required? [JH] I am unable to find a full discussion on assumptions and data sources relating to climate change either in the Main Report or Appendix C. There is brief reference in Appendix H. The inclusion of this is important as it provides the framework for future erosion and flood risk. [SJ] | Can the team please consider? [JH] Could the team clarify where climate change assumptions are set out, or if not included add some additional explanation. I suggest this should be in Appendix C with some cross reference in Ch.3. [SJ] | Review of Draft | Jim Hutchison Steve Jenkinson | JD 09/08/2010 | Words added to Chapter 3, 3.1.1 as follows " Sea level rise is a key component of our assessments of change at the coast, about which there is uncertainty, however the use of government adopted allowances allow for consistency in approach across all SMP2s. Sea level rise is the general term for the upward trend in mean sea level resulting from a combination of local or regional geological movements and global climate change. Within the SMP2 we have used the recommended contingency allowances for net sea level rise as adopted for use by the government in 2006 (FCDPAG Economic Appraisal Supplementary Note to Operating Authorities - Climate change impact, October 2006). This approach results in the following contingency allowances for sea level rise for the three SMP2 epochs: 0.06m to the year 2025; 0.34m to 2050; and 1.0m to the year 2105." | 31.1. |
| 10 | | 23-Apr-10 | Technical | Decision Making | Main Report | The document explains the aim of developing policy for individual units within the POZ framework to ensure that the implications of managing one policy unit on another are considered. This is an important facet of policy option selection, but I am not clear where these considerations are explained in the POZ or PU summaries ie. I might expect to see some comments in the POZ/PU summaries which explain how the policy option for one unit has been influenced by those relating to adjacent units? | Could the Project Team provide some clarity on how the approach works and any examples of this? | Review of Draft | Steve Jenkinson | JR 10/08/2010 | Along the majority of the frontage there is no direct linkage between policy units. This is due to the nature of the coastline i.e. long stretches of open cliff intersected by prominent headlands and with small coves present which have developed mainly at the mouths of small river valleys. This leads to a generally disconnected coastline with little in the way of longshore littoral transport. Many policy choices therefore are made independently of adjacent units and are much more dependent on the characteristics of the discrete area itself. However there are PUs & MAs where there are more direct links, e.g. at Marazion-Penzance and St Ives Bay. In these areas we have tried to indicate how policy choice is linked between neighbouring PUs. At Downderry we have adjacent PUs covering a developed frontage but with minimal alongshore links and justifications for policy choice based on links to neighbouring Seaton are provided. | No change |

| Item Number | Shoreline Profile | Date Master revised | Criteria Heading | Criteria sub heading | Document Reference | Comment | Action Required | Timing of Comment | Comment provided by | Date Response Provided | Response | Section Amended (New para nos and Table nos used in this column) |
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| 11 | | 23-Apr-10 | Technical | Linkages | General | The SMP should explain both the spatial relationship and policy/planning links with other high level plans where relevant, such as coastal strategies (including non FCRM). | Could the Project Team clarify where in the SMP these relationships are set out? This should include a commentary on plan status and interface with the SMP, and preferably mapping simply to understand the spatial links. | Review of Draft | Steve Jerkinson | 10/09/2010 | Words added "3.4 Links to other plans 3.4.1 The spatial planning system The Government's national policy for managing development on coastal areas affected by coastal change is set out in Planning Policy Statement 25 Supplement: Development and Coastal Change (March 2010). The aim is that coastal communities should continue to prosper and adapt to coastal change. This means that planning should: - ensure that policies and decisions in coastal areas are based on an understanding of coastal change over time - prevent new development from being put at risk from coastal change - ensure that the risk to development which is, exceptionally, necessary in coastal change areas because it requires a coastal location and provides substantial economic and social benefits to communities, is managed over its planned lifetime, and - ensure that plans are in place to secure the long term sustainability of coastal areas. In order to achieve the above it is essential that planners are informed about the current shoreline and future physical changes to it through erosion, coastal landlip, permanent inundation and coastal accretion. The SMP is therefore a key source of evidence base that planners should consult when determining the material planning considerations set out above (Policy DCC1 from PPS25 Supplement). The SMP2 assists planners by identifying Coastal Change Management Areas (CCMA). These are areas likely to be affected by physical changes at the coast, for which the planning authority should set out the type of development appropriate throughout the development of the Cornwall and Isles of Scilly SMP2. The Client Steering Group has consulted with the Forward Planning team at Cornwall Council about CCMA's within the study area and the SMP2 Preferred Plan for these for 3.4.2 Coastal Strategies. The SMP provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks in a sustainable manner. In doing so, a SMP is a high-level document that forms an important part of the evidence base for the development of the Action Plan. Following the adoption of the SMP, the Action Plan should therefore be used by the operating authorities to direct investment at the coast. Often this requires further study at a Management Area or Policy Unit level to determine the next steps. | 3.4 |
| 12 | | 23-Apr-10 | Technical | Tools | Appendix C, Defence Assessment | The defences appear to have been identified, but the assessment is unclear. Has any prioritisation been carried out? [JH] The report is descriptive of the various defences around the coast but does not state any information about condition or standard of protection. [KT] | Can the team clarify what assessments have been done, including any prioritisation? [JH] Can the team clarify whether this is picked up in the economics report - if not please consider adding more information here? [KT] | Review of Draft | Jim Hutchison Karen Thomas | 13/08/2010 | Additional words and a new table added to this appendix. New table sets out condition etc details of defences. | App C Defences assessment |
| 13 | | 23-Apr-10 | Technical | Tools | Main Report Ch.5 | I note that several of the PU statements include management of risk through the use of flood warning systems and support to community resilience. | Could the Project Team confirm that relevant actions are included in the Action Plan to ensure that these management activities secure an appropriate level of consideration? | Review of Draft | Steve Jerkinson | 10/08/2010 | Yes - the Action Plan has now been produced and there are frequent references to the requirement for such improvements to the flood warning service and reference to support for community adaptation and resilience linked into the land use planning system. | |
| 14 | | 23-Apr-10 | Social | Decision Making | Main Report Ch.1 Introduction Ch.5, various units | It would assist the reader if the changes from SMP1 to SMP2 were known and it appears that Para 1.3.1 could usefully have a cross reference to the location in the plan where this information is set out. Where there is a change in proposed policy option between SMP1 and this plan, I assume the reasons are clear and the stakeholders and public are aware and that there should be no surprises. [JH] There does not appear to be a succinct comparison of SMP1 and currently proposed policy options, which would be a very useful point of reference for stakeholders. [SJ] | Please add cross reference in Ch.1 and highlight where implications are discussed in the plan. Can the team please confirm that they have made the reasons clear in this section where the SMP2 proposes a change from that set out in SMP1? [JH] Could the Project Team please consider the inclusion of a straightforward summary table which compares SMP1 and SMP2 policy options, and includes a brief note on the reason for the change? [SJ] | Review of Draft | Jim Hutchison Steve Jerkinson | 07/08/2010 | 1.3.1 Wording amended - Very much inflated by the findings of the SMP1, a considerable effort has been put in place over the last three years to ensure that we have been in a better position to make judgements with respect to the coast. - removed reference to last 3 years. 1.3.1 Extra words added "The review undertaken by this SMP2 has resulted in some changes to the SMP1 policy options for a number of policy units. Chapter 5 provides a summary and overview of the SMP2 preferred plan and policy option choices. This provides a direct comparison of SMP1 and SMP2 policy so that where the policy option has changed, this can be clearly recognised. The discussion around policy development, including any changes from SMP1 to SMP2 is provided within the discussion and detailed policy development in Chapter 4." The Summary table in Chapter 5 provides the comparison between SMP1 and SMP2, with the discussions in Chapter 4 providing reasoning for the SMP2 policy. | 1.3.1, 1.3.1 |
| 15 | Showstopper | 23-Apr-10 | Social | Engagement | Appendix B | It is important that all the comments that are received during the consultation of this plan are clearly documented with a suitable response so that all can see how their issues have been dealt with by the CSG. [JH] There are two tables of stakeholder responses included in this appendix, but no record of how these have been addressed. [SJ] | Can the team please confirm that Appendix B is suitably populated with clear responses on all issues raised during the consultation exercise? [JH] Could the Project Team confirm that the final SMP will contain a full record of comments and how these have been dealt with, including any changes made to the SMP (particularly policy options) as a result? [SJ] | Review of Draft | Jim Hutchison Steve Jerkinson | 10/08/2010 | HJK has prepared a communications plan which sits within the Appendix B document. This sets out all the comments received during the consultation stage from all sources. Upon finalisation this is where spreadsheets will be added as an annex to provide an audit trail of the consultation comments and the responses and actions (this will include the NGRS spreadsheet). Section B3 does state where stakeholder responses received in earlier engagement were incorporated into the developing SMP. | Appendix B section B4 |
| 16 | | 23-Apr-10 | Social | Engagement | Appendix B | Several comments on this appendix: a) Neither the web page nor the report appendix appear to have a formal stakeholder list but this may be present on the web somewhere - just couldn't locate it perhaps? Are there published minutes of meetings or records of the formal discussions at CSG and EMF? These may be on the web through the password protected portal but should these be made available to all for transparency? Having logged on to the website I found the stakeholder engagement plan online and would question if it needs to be in the appendix as well? b) In addition the engagement plan has not been updated with dates of meetings and events since quite early in the plan which just makes it difficult to see how well the SMP has been disseminated and discussed locally. | Can the team please: a) confirm that the final version of this appendix will include a stakeholder plan, including stakeholder lists and a full record of meetings with CSG and EMF? b) confirm that engagement data will be up-to-date? c) confirm that a communication plan was prepared? d) clarify whether stakeholders had time to provide feedback? How did CSG manage these queries and stakeholders? e) clarify whether any stakeholder analysis undertaken to establish this and also to direct focused engagement with those with the most at risk/stake in the plan? | Review of Draft | Karen Thomas | 12-08-10 | Confirmed that the final version will include a copy of the Stakeholder Engagement Plan (SEP) that we have been working to - which was drawn up and agreed by the CSG during Stages 1 and 2 respectively. The SEP has been (and still is) a full record of meetings with CSG and EMF? Our intention is to include (for publication) only a set of the Agendas used for the CSG and EMF meetings respectively. This is because the full sets of minutes would be exhaustive and some items in the CSG minutes are commercially sensitive. b) confirm that engagement data will be up-to-date? Confirmed that data will be supplied as per the answers given above and below. c) confirm that a communication plan was prepared? Confirmed that the CSG have deemed the relevant part of the SEP to be the communications plan - and this has been followed. The text in Appendix B itself also explains the communication streams used. | Appendix B section B4 and section B2.1. To be completed for final SMP. |
| | | | | | | c) Is there a communications plan and has there been any press or media advertising of the SMP consultation other than the web to ensure maximum public and stakeholder involvement? d) Feedback from the few stakeholders that commented pre-Xmas 2009 (in the appendix report) was for greater clarity on when they could feedback to the process. e) There is an early statement in the appendix that there was no distinction to be made between Key Stakeholders and Other stakeholders. | e) clarify whether any stakeholder analysis undertaken to establish this and also to direct focused engagement with those with the most at risk/stake in the plan? Yes, a Summary Table has been drawn up and will be included in Appendix B which provides (in precise text) the responses received from the Stage 4 public consultation. Once the policies have been confirmed for adoption, a reply will be sent to all stakeholders. | 12-08-10 | | Other changes will be made upon finalisation. | | |
| 17 | | 23-Apr-10 | Social | Engagement | Main Report Ch.3 Appendix B | Effective engagement with spatial planners is important through both the development and implementation of the SMP, but I have not seen any discussion on how they were involved during SMP development nor on how links will be pursued. | Could the Project Team comment on the extent and effectiveness of engagement to date? If this has not been documented in the SMP then further comments should be added, possibly in Chapter 3. Also please confirm that appropriate actions will be included in the Action Plan to ensure effective integration with the statutory planning system will be achieved. | Review of Draft | Steve Jerkinson | 10/08/2010 | Discussion on links to spatial plans added to chapter 3. This discusses identification of CCMA's and that the Cornwall Council forward planning team have been consulted throughout the SMP process which has occurred in tandem and has led into their Local Development Framework Core Issues and Options development. CCMA locations and actions flagged in the action plan. | Chapter 6, Chapter 3.4.1 |
| 18 | | 23-Apr-10 | Social | Resilience/Adaptation | Main Report Ch. 5; eg. PD24, Page 26 | Where there is a need for using the coastal change pathfinder approaches, I assume that this is clearly set out. It would be good to include a summary of locations where this future approach might be appropriate. For example, Unit 7.4 appears to have property that may be at greater risk now over the plan period. Economic assessment indicates that defending will be difficult to justify, so is this an area where the outcomes from Pathfinder trials might help, for example where there may be a need to allow for caravans to move to adjust to an eroding cliff? [JH] In locations where there are small numbers of properties at risk of erosion or flooding there is scope for considering adaptation. I recognise that adaptation is discussed in the SMP in various parts of the reports, but are opportunities for more specific consideration in the first epoch being overlooked? [SJ] | Can the team please clarify whether Unit 7.4 is a location where the Pathfinder studies may help? Are there any other locations where this should be a consideration? Also, can the team clarify how many properties and other major assets are relevant? [JH] Could the Project Team confirm that the preferred policy options throughout the SMP reflect the potential opportunities for adaptation where few properties appear to be at risk, and that appropriate actions will be included in the Action Plan to take these forward? It is important to draw out those areas where adaptation measures may be appropriate. [SJ] | Review of Draft | Jim Hutchison Steve Jerkinson | 10/08/2010 | If the longer term HR and MA policies are to be taken forward for locations such as Dowderry, Praa Sands, Mounts Bay, Coverack and St Mary's, the Coastal Management Plan / Pathfinder approach may provide a good route forward. As with North Norfolk, a Council led and council wide approach seems to be best, so there may only need to be a single plan for the Cornwall area and one for Isles of Scilly. An action that could support this might be along the lines of:- Policy Unit Cornwall wide, and toS wide Action: Prepare a Coastal Management Plan Timescale Short to medium term Objectives: To develop a positive vision and address the consequences of coastal change. To address many of the social and community issues that the SMP was unable to tackle. Indicators: Coastal Management Plan web-site set up. Workshops held at key settlements. Community vision for adaptation produced. Partners: CCHS C, Town and Parish Councils; Delta; EA; English Heritage; NE Priority: High Funding: FODIA We are not sure of the reference to PU7.4 at Duporth and relevance of Pathfinder approach - the description of moving caravans does not seem to fit this PU?? | To be incorporated into action plan following agreement with CSG. |
| 19 | Showstopper | 23-Apr-10 | Environmental | Adoption/Approval | Appendix F, Non-Technical Summary, bottom of page 3. | Natural England involvement: "Due to the intricate and multivariate nature of SMPs, the appraisal took the form of a qualitative assessment based on professional judgement, GIS analysis and.... Were NE a party to the assessment of impacts on Natura 2000 sites?" | Please clarify whether NE were a party to the assessment and whether Appendix I conclusions are being reported in the NTS. | Review of Draft | Liz Galloway | PT 23/08/2010 | Natural England were consulted on the HRA and SEA, and were involved in the assessment process, namely through the local NE contact (Kevan Cook) who was also on the CSG who has agreed with the assessment and reporting. | Letter of agreement to findings and SMP to be obtained to be presented with the final. |
| 20 | | | | | | There are a number of Environment and Nature Conservation sections that do not reference all of the designates sites (SSSI/SAC/SPA/Ramsar) located within each PDZ. For example: - PDZ1, PDZ2 Poluan to Poligero SAC should also reference in policy summary) - PDZ1 p5 - include Cuckoo Rock to Turbot Point SSSI. - PDZ 6 Fal and Helford SAC - PDZ10 Hayle Estuary and Carrack Gladden SSSI & Aine Point to Carrick Du SSSI. p25 SEA summary should reference Oriblan to Mexico Towers SSSI, Godolphin to St Agnes SSSI. | | | | 10/08/2010 | Yes - text amended | PDZ1, PDZ4, PDZ5, PDZ10 |

| Item Number | Issue/Topic | Date | Criteria Heading | Criteria sub heading | Document Reference | Comment | Action Required | Timing of Comment | Comment provided by | Date Response Provided | Response | Section Amended (line para nos and Table nos used in this column) |
|-------------|-------------|-----------|------------------|-----------------------|---|--|---|-------------------|---------------------|------------------------|--|---|
| 20 | | 23-Apr-10 | Environmental | Conservation | Main Document Chapter 4 | PDZ11 Introduction should reference SSSI/SACs present along stretch of coast. Environment and Nature conservation summary should also reference SSSIs and SACs. p23 SEA summary should reference SSSIs in MA30 (Trevouance Cove, Cligga Head & Penhale Dunes SSSIs) - PDZ14 River Camel SAC - PDZ15 p16 Boscastle - should also refer to impacts to the Tintagel-Marshland-Clovelly Coast SAC in 3rd para - PDZ16 Duckpool & Furzey Cove SSSI, Boscastle to Wisemouth SSSI - PDZ17 SSSIs - Sleepy Point to Marshland Mouth and Marshland to Clovelly Coast. p1 Summary should make reference to the fact that the entire stretch of coast is SSSI and SAC - PDZ18 SEA summary should include Big Pool and Browarth Point SSSIs and Isle of Scilly SPA and Ramsar. | Can the team amend the environment and nature conservation sections to list statutory sites within PDZ boundary? | Review of Draft | Nikki Homs | JR 10/08/2010 | Yes - text amended | PDZ11, PDZ14, PDZ15, PDZ16, PDZ17, PDZ18 |
| 21 | | 23-Apr-10 | Environmental | Conservation | Main Report Chapter 4 | There are a number of areas within the PDZs which do not include discussion on the impacts on various designated sites, for example: - PDZ2 p18 - include impacts to SSSI with regard to Gorran Haven. Reference possible impacts to Cuckoo Rock to Turbot Point SSSI in relation to HTL/MR policies at East Portherland. - PDZ2 pp36-38 include area of habitat loss from coastal squeeze identified in HRA at Gweal in discussion text. HRA summary should reflect impacts in the Helford not those in the Fal. - PDZ2 pp14-17 Policy discussion for Coverack and Cadgwith should include implications for adjacent SSSIs - Coverack Cove to Dolor Point SSSI, Kenack to Coverack SSSI. The SEA summary should also make reference to these SSSIs. | Can the team consider including additional text to these PDZs to clarify impacts, and amend HRA summaries as necessary? | Review of Draft | Nikki Homs | JR 10/08/2010 | Yes - text amended | PDZ4, p19, PDZ5, pp36-38, PDZ6, pp14-17 |
| 22 | | 20-Apr-09 | Environmental | Data and Mapping | General | English Heritage has been undertaking Rapid Coastal Zone assessments around the English coastline. | Could the Project Team advise whether any of these assessments cover the MA3 areas, and if so whether they were used to inform development of the plan? | Review of Draft | Steve Jenkinson | PT 23/08/2010 | No RCZA has been carried out for Cornwall and the Isles of Scilly. However, we have obtained and used all the HER data available, as well as the EH data layers, and therefore have incorporated all EH requirements in relation to the historic environment. | No edits or additions necessary. |
| 23 | Showstopper | 23-Apr-10 | Environmental | Decision Making | Appendix J (WFD) | Water Framework Directive and SEA. Section 4 seems to focus on avoidance and mitigation - but are there opportunities which can be identified, to be pursued through later stages? Are impacts from the WFD conclusions being factored into the SEA as impacts and/or opportunities. For example (1) relating to heavily modified waterbodies, "any further" enhancements, such as to increase connectivity between floodplains and the channel, can only be proposed at a scheme level." If not included at SEA level, it likely to be lost at scheme level - opportunities need to cascade through the levels. | Please consider the significance of WFD effects (both positive and negative) and confirm that they are included in the impact assessment. Also incorporate mitigation requirements and define opportunities. | Review of Draft | Liz Galloway | JD 23-08-10 | WFD is a standalone assessment relating to WFD process/requirements. The relevant WFD findings and requirements are implemented in the SMP Action Plan. | Chapter 6 action plan |
| 24 | | 20-Apr-09 | Environmental | Decision Making | Main Report Chapter 4 PDZ 10 p18 | Unclear why HTL policy is required for "split" (7) feature inside the estuary to the north of South Quay - split and HTL policy clearly identified on Chapter 5 Policy Map for Management Area 27 - Heyle Estuary. Appears to be lagoon (7) on landward side of split. | Can the team please clarify what the feature is and the choice of policy option, and amend the document as appropriate? | Review of Draft | Nikki Homs | JR 10/08/2010 | The feature is an area of sand which dries at low tide. The hold the line policy applies to the south quay and Carnaw Pool walls / structures but there is no intent to apply it to the estuary channel features. The mapping mistakenly follows the outline of the feature, so policy mapping has been changed. | PDZ10, policy mapping for MA27 has been changed |
| 25 | | 23-Apr-10 | Environmental | Decision Making | Main Report Chapter 4 PDZ 14 p18 | Amble Marshes SSSI - question sustainability of HTL policy for 1st Epoch. If the SSSI is unfavourable condition due to groundwater levels, may it not be better to look at MR generating a more sustainable complex of habitats? Unless the current issues can be resolved easily. | Can the team comment on the sustainability of the proposed HL policy option, and whether MR may be more appropriate? | Review of Draft | Nikki Homs | JR 10/08/2010 | Amble marsh is currently a freshwater habitat, so HTL in the short term allows for phased in land migration of the freshwater habitat prior to creation of saltwater habitat that MR would produce. In the short term, the Agency is carrying out floodplain channel works to improve wetting on the current freshwater grazing marsh to bring this into favourable condition. | No changes |
| 26 | | 23-Apr-10 | Environmental | Decision Making | Main Report Chapter 4 PDZ 19 Bryher | Justification for HTL at Great Poststones is unclear - what assets are being defended, fresh water source? Suggest policy unit is altered to avoid HTL policy along northern shore of Gweal Hill. | Can the team please clarify reasons for the choice of policy option and whether management area should be amended to remove undefended coast from HLT policy? | Review of Draft | Nikki Homs | JR 10/08/2010 | Policy unit boundaries have been adjusted. Text amended to clarify. | PDZ18, pp44-45 |
| 27 | | 23-Apr-10 | Environmental | Decision Making | Main Report Chapter 4 PDZ 18 St Agnes | Big Pool HTL policy - Alter policy units? Perogis slips to Ginamoney Cam and Ginamoney Cam to Browarth Point, to avoid HTL policies over additional sections of coast including Burnt Island. | Team to consider amending management areas to exclude undefended coast from HTL policy. | Review of Draft | Nikki Homs | JR 10/08/2010 | Have amended policy unit mapping and policy choice mapping. | PDZ18, MA46 policy mapping |
| 28 | | 23-Apr-10 | Environmental | Decision Making | Main Report Chapter 4 PDZ 8 p15-16 p18 HRA Sect 5.3.27 | Hold the line is a valid option to protect the NZK site (management necessary for nature conservation) and so the statement on page 16 is correct. However it may not be sustainable to HTL in situations such as this in the long term. If it is not considered sustainable to HTL here for 100 years, then MR in epoch 2 or 3 may be a valid option. If this approach is taken, then compensatory freshwater SPA habitat will be required and this also needs to be taken through the alternatives and HROP route. If it is considered sustainable to HTL for the next 100 years, then HTL is a valid option. HRA summary should make reference to Marazion Marsh. HRA - likewise discussion on the impacts to the SPA is correct in relation to the proposed policies, but conclusions are dependent on whether HTL is sustainable at the site for the long-term. | Can the team comment on the long term sustainability of the proposed policy options in these situations, and whether MR may be more appropriate in later epochs? | Review of Draft | Nikki Homs | JR 10/08/2010 | Whilst HTL is not the ideal policy, it is technically feasible and ensures that the SPA is not lost to tidal encroachment. It is not clear at the SMP level that appropriate alternative locations are available for the Marsh, and the SMP will need to action in particular a Spatial Planning with support from a Mounts Bay Strategy to further explore if relocation options are deliverable. Therefore the CSO have strongly steered the policy at this location toward HTL through the 3 epochs, whilst accepting that HTL may not be sustainable in the long term and alternative strategies will need to be scoped at strategy level. In addition, EA and NE strongly influenced the policy selection for Marazion Marsh. | No changes |
| 29 | | 23-Apr-10 | Environmental | Resilience/Adaptation | Appendix J Assessment Table 2a | Table 2a sets out the WFD policy objectives that are considered relevant to the water body. In most cases only one objective is referred to and it is difficult to understand how this can be the case, particularly where WFD has been excluded. Are there potential effects on intertidal habitat that are not being considered as a result of this? | Please clarify the reasons why WFD has been considered not to be a relevant consideration to a number of water bodies. | Review of Draft | Karl Fuller | JR 10/08/2010 | WFD objectives 2 and 3 will be reviewed and if relevant will be included, further details will be included in the assessment. | No changes |
| 30 | Showstopper | 23-Apr-10 | Environmental | Risks and Impacts | Appendix F: SEA: Main body of Environmental Report para. 1.8.4. | SEA Methodology: Assessment of Impacts: This explanation seems to be justifying how the SMP2 fulfils the same role as SEA, whereas in reality, the Environmental Report (ER) is not achieving the key objectives of SEA. The ER fails to identify significance of effects, potential risk factors and benefits, or the reporting of likely impacts of the plan. The whole SEA is reduced to a grey area of slightly positive and slightly negative effects which are difficult to reconcile with, for example, the statement that "as a whole, the SMP2 has a likely significant effect on the majority of Natura 2000 sites" in Appendix I. There are potential show-stoppers and of major significance. Instead of reporting this, there are simply reassurances in a number of places that a sustainable balance was achieved across a range of complex issues. The role of SEA is to make this thinking transparent - to learn of the show-stoppers, trade-offs and the decision making process. | Please describe the impacts in a way that reports the range of risks and benefits to the plan in an accurate and representative way. Also, interpret the use of the word "significant" used in the Main SMP2 Report relative to levels of significance in SEA methodology. | Review of Draft | Liz Galloway | PT 23/08/2010 | It is unclear how and where this justification arises within the document. It is clearly stated in Sections 1.6 and 2.2 of the ER that the SEA reports on the assessment of effects of the SMP. The fact that there has been an iterative process whereby the SMP policies have been influenced by the findings of the SEA in order to reduce or avoid significant impacts is a standard process. The significance of the effects has been described in terms of method and definition within Sections 2.2 and Section 4, and throughout Section 4 the assessment at the PDZ level within the Section 4 tables prevents the achievement or not of the objective. Because of the wide range of positive and negative effects throughout, and due to the reduction of significance of the impacts through the PDZ policy intents that were developed, we have attempted to provide more clarity between what the positives and negatives are within the SoEP, however, it is considered that all impacts were assessed and identified (Annex I) and these have been summarised at the PDZ level in Section 4 and also further described in that Section, bearing in mind the strategic nature of the Plan and the SEA. | See SoEP, 4 |
| 31 | Showstopper | 20-Apr-09 | Environmental | Risks and Impacts | Appendix L, para 6.1.2 Table 2.1 | Habitats Regulations Assessment: Its not clear whether the likely effects on Natura 2000 sites have been factored into the SEA. Why are none of these significant, even though HROP is being considered? Overall the SEA has assessed that no major impacts will affect the integrity of the Natura 2000 Sites within or adjacent to the SMP boundary. According to Table 2.1, seven sites will be affected by all of the management options - the remaining four may or may not, depending on the option chosen. How does this sit with the comment that, "as a whole, the SMP2 has a likely significant effect on the majority of Natura 2000 sites" in Appendix I? More information on the timing of future stages of HRA would be helpful here. | There seem to be conflicting statements in relation to the likely impact on Natura 2000 sites (1) please clarify and ensure that the SEA is reporting the full (likely) impacts and (2) please indicate the timescale of AA, i.e. further stages in Table 2.1. | Review of Draft | Liz Galloway | PT 23/08/2010 | The HRA identified that up to 5 and previously 6 possible PDZs could result in an adverse effect on integrity. However, those were prior to the inclusion of mitigation measures that would prevent (or in one case (PDZ2) further assessment and discussion with NE and EA that clarified no impacts) an adverse effect. These have been identified in the Section 6 of the HRA, and also carried forward into the SMP Action Plan. The revised deliberation and assessment AT PDZ2 with NE and EA has resulted in changes to the significance and overall prevention and avoidance of adverse effects remaining after mitigation. The revised HRA reports this particularly in Section 5, 6 and Appendix CS, and the SoEP also contains the updated findings and resulting conclusions in relation to impacts of the policies. | HRA (section 5.6, App C) and SoEP |
| 32 | Showstopper | 23-Apr-10 | Environmental | Risks and Impacts | Ch. 4 PDZ 4 MA08 | Establishing significance: A key task of SEA is to establish the likely significance of effects of the plan in a systematic way; environmental effects are reported in Section 4 of the main report. However, the use of the term "significant" in the SMP2 is unclear and inconsistent if related to SEA Appendix where no effects of the preferred management options are of greater than "low" significance. For example, significance of receptors is described at Penleven (MA08) in Ch. 4 of the Main Report. "A significant flood risk still exists in and around the Penleven inner harbour - village is wholly designated as a conservation area - there is a very significant potential erosion risk along the length of the beach (by Ballod) Mevagissey, is similarly described as having a significant environment vulnerable to flooding, so would not HTL create significant positive effects?" | Please consider: (1) whether effects of change brought about by the proposed plan are being assessed, (2) whether all effects are included, e.g. negative effects on HD sites, positive effects on population and (3) whether significance is being recorded according to SEA methodology. | Review of Draft | Liz Galloway | PT 23/08/2010 | The use of 'significant' is derived from the engineering terms for flood risk, however, the SoEP summaries by MA the impacts and their significance at the regional level providing the concluding clarity. | See SoEP. |
| 33 | | 23-Apr-10 | Environmental | SEA-AA | Annex II Table 1.8 | Omits Duckpool to Furzey Cove SSSI, Amble Marshes SSSI, Marshland to Clovelly Coast SSSI. | Can the team amend the table? | Review of Draft | Nikki Homs | PT 23/08/2010 | Duckpool to Furzey Cove SSSI is identified in Table 1.5. Omission of the other two was an error due to GIS clipping, however, the sites are all presented in the assessment tables in Annex I of the ER. Section 4 of SoEP provides an update to Annex II table 1.8. | Section 4 SoEP |

| Item Number | Showstopper | Date Master revised | Criteria Heading | Criteria sub heading | Document Reference | Comment | Action Required | Timing of Comment | Comment provided by | Date Response Provided | Response | Section Amended (New para nos and Table nos used in this column) |
|-------------|-------------|---------------------|------------------|----------------------|--|--|--|-------------------|----------------------------------|---|--|--|
| 34 | Showstopper | 23-Apr-10 | Environmental | SEA/AA | Appendix F Environmental Report: Non-Technical Summary pp.3 & 4/ Sect 1.8.2 | <p>SEA Procedure: Finality of ER: There is a lack of clarity around the requirements of an ER throughout, for example, however it should be noted that these assessments are only preliminary until consultation and finalisation of this Environmental Report is complete" (p.3, NTS) What does this mean? The Environmental Report should contain an authoritative and accurate assessment of the likely impacts of the plan and is final, once published. Any amendments required due to new information can only be made in the form of Addenda.</p> <p>6.1.1 states "This report is provided for consultation simultaneously with the SMP 'draft'. It is therefore the final ER, and cannot change now. Revisions can be made either in an Addendum or some matters may be addressed by an extended 'Statement of Particulars' that deal with the issues arising out of consultation. The COPM guidance mentioned as a reference provides a clear and detailed description of elements required.</p> <p>The same procedure will need to be applied to all similar comments on the SEA.</p> | Review of Draft | Liz Galloway | PT 23/08/2010 | This statement is purely noting that consultation on the draft SMP and ER could result in changes to the SMP policies and these would be re-assessed. Where such changes have taken place the overall findings and conclusions have been presented in the SoEP. There has been no new information following the production of the ER, the only changes to impacts are based on any changes to policies and more detailed formulation of policy activities or intentions. | See SoEP. | |
| | | | | | Appendix F (SEA) Non-Technical Summary (no para numbers) | <p>Alternative policy options should have been assessed already. Feedback received will shape the finalisation of this report and the evaluation of the environmental effects of the SMP. Again, this remark suggests that the assessment is not final. "As a component of the Environmental Report, monitoring measures will be specified post-assessment" if they are to be included in this report, then it must be pre-published.</p> <p>Section 1.8.2 "The SEA will form a component of the wider assessment mechanisms for the SMP which also includes..." (AA and WFD). This statement is incorrect. The SEA should report all known impacts on the environment, including AA and WFD. Uncertainties should also be described, with parameters of risk.</p> | | | PT 23/08/2010 | All the policy options were assessed (see Section 4), and further detailed assessment of the preferred policy was presented in Annex 1 of the ER. The statement regarding the AA and the WFD was intended to identify that these two assessments are separate to the SEA as it stands, being that they are requirements that result from other legislation. However, the findings of the HRA were carried through into the ER. All final conclusions are presented in the SoEP. | See SoEP. | |
| 35 | Showstopper | 23-Apr-10 | Environmental | SEA/AA | Appendix F Environmental Report: NTS (page 3 last para and para 6.2.2) | <p>Mitigation and Monitoring: "In addition to providing the results of this assessment, the Environmental Report also provides monitoring and mitigation measures to ensure that the effects are minimised as far as possible" Where are they? The approach to, and requirement for, monitoring and mitigation is discussed in Section 7.7. Where is this Section 7.7 (Section 7 is References according to the Index. No section 7 in Main Report)</p> | Please define the requirement for mitigation against impacts in the Environmental Report to ensure that this mitigation is recorded and can be revisited at implementation stages. | Review of Draft | Liz Galloway | PT 23/08/2010 | Mitigation and monitoring is provided in Chapter 5 of the ER, and these have been carried through into the SMP Action Plan. | No edits or additions necessary. |
| 36 | Showstopper | 23-Apr-10 | Environmental | SEA/AA | Appendix F (SEA) Non-Technical Summary (no para numbers) | <p>Non-Technical Summary: The NTS contains baseline description, SEA methodology and the setting of assessment criteria. The last half page explains how complex the task of assessment is and reassures the reader that "The majority of effects here are either minor positive or minor negative". This is inadequate coverage of the likely effects for coastlines which have been described as sensitive and complex due to their natural environment, many international sites, landscape and cultural heritage. There are apparently no effects of moderate or major significance and the reader is bound to ask whether this can really be the case. The reader expects a transparent summary of the key potential impacts here. The NTS also requires information on how the SEA will proceed from this point.</p> | Please revisit the assessment and draw out and summarise in an Addendum to the NTS, the effects of the proposed plan to reflect the assessment in the ER. Indicate the risks, the threats, the opportunities and any showstoppers, covering all receptors and including likely HRA impacts. Please also indicate what happens next in SEA procedure. | Review of Draft | Liz Galloway | PT 23/08/2010 | The SoEP provides further clarified summary for the NTS. However, in relation to significance, as no adverse effect on integrity to European Sites occurs, and given the significant amount of interaction between the SMP development and the SEA, policies have been determined (with additional details of what the measures should or should not entail within the PDZ reports) to minimise impacts and to mitigate for impacts where they are potentially significant. | See SoEP. |
| 37 | | 20-Apr-10 | Environmental | SEA/AA | Habitats Regs Assessment | The assessment reported in this appendix appears to be incomplete. | Can the team please clarify whether more work is required, and if so when this will be undertaken? | Review of Draft | Andy Parsons | MH 100809 | Document should clarify the situation. In particular conclusions are clarified. Also, to assist readers, Appendix 1, the whole scoping report, has been reproduced with blue text, rather than black, to differentiate the two documents. This should clarify and prevent future confusion. | Appendix 1 |
| 38 | Showstopper | 20-Apr-10 | Environmental | SEA/AA | HRA S 5.3.2.2 & Appendix C6 | PDZ 6 - Second sentence is incorrect - MR policy option at Porthallow is adjacent to the Fal and Helford SAC. Appendix C6 identifies the loss of - the heathland from the Lizard SAC as a result of the MR policies at Kenack & Jangye-ryn. The loss of this SAC heathland should be mitigated or compensated. The loss of this habitat could result in an outcome of "can not conclude no adverse effect on integrity". | The team should review the impacts of the proposed policy options on this PDZ and ensure an appropriate response is identified. | Review of Draft | Naki Homs | MH 100809 | Sections restructured wrt NAOI and mitigation measures. Should clarify this point and align the assessment better with the formal HRA assessment procedures. Mitigation measures made more clear, and reflect those identified in the assessment tables Appx C. MH 100811 | Appendix 1 |
| 39 | | 23-Apr-10 | Environmental | SEA/AA | Main Report Ch.2 | This chapter sets out the conclusion that the SMP has been subject to an HRA. | Can the Project Team update this action by summarising the HRA findings, including the need to submit a Statement of Case to Defra SoS and, if applicable, any further actions to be included in the Action Plan? | Review of Draft | Steve Jenkinson | MH 100809 | TO INCLUDE IN FINAL SMP REPORT | Appendix 1 - Chapter 2 |
| 40 | | 23-Apr-10 | Environmental | SEA/AA | Main Report, Chapter 4 PDZ 5 job | HRA summary - states overall there will be no net loss of intertidal, this should be rephrased to indicate losses inside the SAC, and net compensation measures outside the SAC boundary. | Can the team amend the document to indicate loss inside SAC and proposed against outside SAC? | Review of Draft | Naki Homs | PT 23/08/2010 | HRA text in PDZ 5 updated to a) reflect no loss of intertidal within the SEA at Truro upper basin b) additional habitat can be created outside of the current SAC boundary at Truro upper basin. | HRA App C, main report and PDZ5 |
| 41 | Showstopper | 23-Apr-10 | Environmental | SEA/AA | Main Report, Chapter 4 PDZ 5; SEA Sections 4.2.27 & 5.2; HRA Sections 5.3.2, 5.3.12-20 & Appendix C6 | <p>Policies of HTL within or adjacent to the Fal and Helford SAC will result in coastal squeeze and the loss in extent of intertidal habitat from within the SAC. MR policies identified within the estuary system (PDZ 5) will allow for the creation of new intertidal habitats adjacent to the SAC to offset the loss of the habitat. The reasoning for the various policies is clear and justified, however this proposed new habitat is outside the SAC boundaries can not be considered as mitigation for the loss of habitats inside the SAC. Only measures taken inside the SAC boundary can be considered as mitigation.</p> <p>Can the team clarify whether the new habitat proposed is mitigation or compensation under the Habitats Regs? If compensation as outside the boundary of the SAC, then the conclusions of the PDZ, HRA, SEA should be amended to reflect this to "can not conclude no adverse effect on integrity" of Fal and Helford SAC. Further work will be required to support Alternative/ROPII tests, which if successful will allow MR sites to be considered as compensation for coastal squeeze impacts. A mechanism to co-ordinate the delivery of MR sites/habitat compensation should be identified EA RHCP?</p> <p>If appropriate measures can not be identified inside the site boundaries, then it has to be addressed by appropriate compensation measures outside of the SAC. Compensation measures can only be considered once the policies resulting in the impact on the SAC have been subject to the further tests of IROPI/Alternatives under the Habitats Regs. If appropriate mitigation can not be identified within the SAC then the HRA must conclude adverse effect on integrity or "can not conclude no adverse effect on integrity". The mechanism to co-ordinate and deliver the MR habitat compensation sites should be identified, it is unclear whether this will be delivered by the EA RHCP, Cornwall Council or another body. This also impacts on the SEA conclusion that the SMP policies will not result in major impacts to Nature 2000 sites.</p> | Can the team clarify whether the new habitat proposed is mitigation or compensation under the Habitats Regs? If compensation as outside the boundary of the SAC, then the conclusions of the PDZ, HRA, SEA should be amended to reflect this to "can not conclude no adverse effect on integrity" of Fal and Helford SAC. Further work will be required to support Alternative/ROPII tests, which if successful will allow MR sites to be considered as compensation for coastal squeeze impacts. A mechanism to co-ordinate the delivery of MR sites/habitat compensation should be identified EA RHCP? | Review of Draft | Naki Homs | MH 100809 | Section revised wrt impacts on intertidal - subsequent work has considered the impacts of SLR and determined that NAOI can be determined here. | Appendix 1 |
| 42 | | 20-Apr-10 | Environmental | SEA/AA | SEA Section 4.2.24-29 | HTL policies in the Upper and Lower Fal should also reflect impacts to SSSIs present in an estuary including loss due to coastal squeeze. | Team to consider additional text on impacts to SSSI due to HTL policies. | Review of Draft | Naki Homs | PT 23/08/2010 | The locations of NAI provide the greatest influence to the intertidal habitats, and where HTL or MR occur the assessment (combined with HRA assessment) indicates that there will be no adverse impact and likely to be benefits due to even greater area of intertidal habitats that MR creates. | No edits or additions necessary. |
| 43 | | 23-Apr-10 | Environmental | SEA/AA | SEA Section 4.2.8 | Question conclusions for PDZ 10, that the impacts to environmental designations are indeterminate. HTL policies in the Hayle Estuary will result in coastal squeeze to SSSI habitats. | Can the team provide further justification for their conclusions and consider the appropriateness of the policy option choice? | Review of Draft | Naki Homs | PT 23/08/2010 | SoEP para 3.1.7.7 revised to clarify the assessment | SoEP 3.1.7.7 |
| 44 | Showstopper | 23-Apr-10 | Environmental | SEA/AA | Section 2.3 and Appendix 1 | The plan concludes the need for a "Statement of Case" for Defra consideration, but it is not set out in this way. It is within the HRA and the importance of the EA's Regional Habitats Creation Programme to be supplied also to Defra. | Can the team please clarify the "Statement of Case" requirements, its role within the HRA and the importance of the EA's RHCP and ensure that the various chapters that deal with this are sufficiently cross referenced. | Review of Draft | Jim Hutchison | MH 100809 | Additional works have confirmed no need for IROPI and that no Statement of Case will be required. | Appendix 1 |
| 45 | Showstopper | 20-Apr-10 | Environmental | SEA/AA | Throughout | Draft Status of the Environmental Report: Why is this document labelled 'Draft'? If out to consultation, it should be the final and cannot be revised beyond the point of publication. All change or addition must be in the form of Addenda - otherwise, it may be included in the Statement of Particulars but only if it constitutes addition to a sound basic assessment. | Explanation of the 'draft' status of ER and timescale for completing final version and providing it for consultation. | Review of Draft | Liz Galloway | PT 23/08/2010 | Noted. The 'draft status' of the ER is in line with status of the 'draft SMP' until it is adopted as such. | See SoEP. |
| 46 | | 20-Apr-10 | Environmental | Sustainability | Main Report PDZA, Page 16 | There are some sites (including this one) where landfill is an issue. The plan does not explain if the relevant authority (presumably the County Council) has a policy for dealing with landfill. | Can the team please clarify and set out any implications in the document? | Review of Draft | Jim Hutchison | JD 23-08-10 | The presence of landfill as an action at specific locations has been highlighted in the Action Plan. | Chapter 6 action plan |
| 47 | | 20-Apr-10 | Economic | Affordability | Appendix H | Where the economic benefit cost ratio (BCR) is relatively low, say <3:1, or 2:1 for example, can the team please confirm that they have selected a policy option that can be implemented. Also, where BCRs are less than unity, or zero, the plan states that public funding might not be available. Surely the current position on this is clearer than is suggested in this Appendix? | <p>Can the team please explain that, where a low BCR has been selected, the preferred policy can be implemented? (Some clarity on the messages made here is required.)</p> <p>Can the team please clarify the low BCRs with respect to future funding?</p> | Review of Draft | Jim Hutchison | | <p>New section added to Appendix H "6 Affordability and commitment intent"</p> <p>The aim of the economic analysis is to determine through a broad brush approach to what degree the preferred policy may be justified in economic terms relating to coast protection or sea defence. In many cases the benefit/cost ratio generated through the assessment is very low, with only a few MAs showing a robust benefit/cost ratio. Although the presence of a robust benefit/cost ratio does not mean that funding from the public purse will be necessarily be available, clearly a very low ratio makes public funding highly unlikely.</p> <p>Where there are known benefits which are not considered within the analysis but which are clearly factors that would need to be considered in future, more detailed economic analysis, these are stated in the notes presented in Annex H1. These factors include properties at risk of flooding from wave action, road and transport assets and environmental assets such as listed buildings and amenity sites.</p> <p>The Client Steering Group (CSG) has considered the results of the economic assessment of the Preferred Plan. Following this consideration the Preferred Plan has not been altered due to concerns over the benefit/cost ratios generated.</p> | Appendix H, H6 |
| 48 | | 23-Apr-10 | Economic | Affordability | Main Report Ch.4 PDZ, PDZ5, PDZ7; Appendix H | There is a statement that BCR is less than unity, but the note suggests that traffic and other losses will make the unit affordable. What if it didn't or if the BCR remains very low and funding was unlikely as a consequence - what is the plan suggesting under such a scenario? [JH] | <p>Can the team clarify if they are content with the messages set out here [and in other PDZs as well, e.g. PDZ5] and what the plan should say in terms of a no funding scenario? [JH]</p> <p>Could the Project Team consider further whether the messages being conveyed are accurate, and adequately reflect the risks associated with future funding? Should there be clearer direction on then need to consider alternative funding sources given the number of private (commercial) interests in some areas? [SJ]</p> | Review of Draft | Jim Hutchison Steve Jenkinson | JD 10/08/10 | <p>The aim of the economic analysis is to determine through a broad brush approach to what degree the preferred policy may be justified in economic terms relating to coast protection or sea defence. In many cases the benefit/cost ratio generated through the assessment is very low, with only a few MAs showing a robust benefit/cost ratio. Although the presence of a robust benefit/cost ratio does not mean that funding from the public purse will be necessarily be available, clearly a very low ratio makes public funding highly unlikely.</p> <p>Where there are known benefits which are not considered within the analysis but which are clearly factors that would need to be considered in future, more detailed economic analysis, these are stated in the notes presented in Annex H1. These factors include properties at risk of flooding from wave action, road and transport assets and environmental assets such as listed buildings and amenity sites.</p> <p>The Client Steering Group (CSG) has considered the results of the economic assessment of the Preferred Plan. Following this consideration the Preferred Plan has not been altered due to concerns over the benefit/cost ratios generated.</p> <p>The CSG have approved the Action Plan based on the Preferred Plan. The Action Plan lists the identified measures necessary to implement the intent of management identified by the Preferred Plan. It identifies partners and sources of funding.</p> <p>A wide range of sources of funding have been considered in drawing up the Action Plan, which include Environment Agency Flood and Coastal Risk Management funding, Defra Grant in Aid funding, Plymouth Coastal Observatory, Nation Trust Shoreline management planning is a continuous process. The SMP2 recommends that further detailed economic analysis will need to be undertaken in justifying any specific scheme in line with the principles set out in the FCDPAG series of reports.</p> | Appendix H, H6 |
| 49 | | 20-Apr-10 | Economic | Affordability | Main Report Ch.4 PDZ MA22 | The Plan notes that there is a very low B/C ratio, and that alternative funding is likely as the harbour performs more than simply a flood defence function. | Could the Project Team advise whether the harbour owners have indicated support for the proposed policy options, and whether discussions re funding have been held or are planned? | Review of Draft | Steve Jenkinson | JD 10/08/10 | The CSG have not held specific discussions with this potential funding provider. The text added in H6 discusses affordability, commitment intent and wider funding sources. This advises that funding for all actions are investigated further as the Action Plan is implemented. With regards to this particular harbour a SMP wide action has been included in the Action plan to assess the role of breakwaters in providing a sea defence and coast protection role. | No change |

| Item Number | Submission Ref | Date Master revised | Criteria Heading | Criteria sub heading | Document Reference | Comment | Action Required | Timing of Comment | Comment provided by | Date Response Provided | Response | Section Amended (New para nos and Table nos used in this column) |
|-------------|----------------|---------------------|------------------|----------------------|---|--|---|-------------------|----------------------------------|------------------------|---|--|
| 50 | | 20-Apr-10 | Economic | Affordability | Main Report Ch.4 Appendix H | The economics are presented for groups of policy units. This makes it difficult to determine the economic viability of policies for individual policy units. [AP] The economic assessment has been undertaken, or at least presented, at Management Area level. It is not clear how the SMP flags any issues with regard to economic viability and affordability at policy unit level. For example, PDZ1 MA23, PDZ2 MA04 both have a benefit cost ratio well below 1 to 1, but there are several Policy Units with do-something preferred policy options in these MA. [S.J] | Consider adding a summary table to Appendix H giving the economic case by policy unit. [AP] Could the Project Team explain how the SMP communicates any potential funding risks for individual Policy Units? Also, how can we tell if these risks have been translated into actions in the Action Plan? [S.J] | Review of Draft | Andy Parsons Steve Jenkinson | 10/08/10 | The economic analysis has been undertaken on a management area basis, as agreed with the CSG. Damages have been determined on a MA basis which means that the economic case by policy unit is not possible without a re-assessment of the damages. Undertaking the analysis at MA level allows consideration of the preferred plan within the context of management for each management area. Minor text added in H1 to now state "The aim of the current review is to determine to what degree the intent of management proposed through the preferred policy may be justified in economic terms relating to coast protection or sea defence. In addition the review aims to examine the nature of the economic justification; considering whether that justification lies strongly with the defence of clear direct benefits, in terms of direct food or erosion risk to assets, or derives from associated damages such as amenity, recreation, traffic disruption or is driven by the aims of other plans". It would be possible to reassess the economics at PU level, with support from the CSG for spending more time on this exercise. It should be noted that due to the large number of relatively small communities present, this could become a too detailed exercise which is beyond the broad-brush approach within the SMP guidance. | Appendix H, H1 |
| 51 | Showstopper | 23-Apr-10 | Economic | Affordability | Main Report Ch.5, PDZ1 | There are some locations where HL is set out for reasons other than coastal erosion or sea flooding, e.g. heritage reasons, for example in PDZ1 and PDZ2 and 6. | Can the team please clarify how the funding for such policy options will work and that any actions for such will be set out in the Action Plan with funding commitments clearly indicated. If assume if the specific funding organisations cannot commit to such funding then the policy option will need to be reconsidered for the final version of the report? | Review of Draft | Jim Hutchison | 10/08/10 | The text added in H6 and at the start of Chapter 6 explains the intent of commitment from organisations that are on the CSG and have signed up to the action plan. | H6 and Chapter 6 |
| 52 | | 20-Apr-10 | Economic | Data and Mapping | Appendix H | It is important that as much relevant data as possible is presented in a usable form, partly to provide an audit trail for the policy option choices and partly to inform high level reporting eg. national summaries. There is useful cost data and properties at risk data provided in this appendix. The text also notes however that a number of high level assumptions have been made with respect to existing defences and managed realignment. | Could the Project Team please clarify whether the data that supports these assumptions are also available or set out elsewhere in the document? Also, what Optimism Bias rate or rates have been used? | Review of Draft | Steve Jenkinson | 10/08/10 | Information setting out assumptions and methods is provided in Appendix H, which is now enhanced. Properties at risk of flooding and erosion are set out in Annex H1, as are the total costs at the location(s) where investment is planned under the preferred plan. The SMP guideline costs are set out in Appendix H, information on type and length of defence is within the defences shapefile supplied in the GIS Viewer. We have incorporated optimism bias in the economic sensitivity assessment now added to Annex H1. | Appendix H including Annex H1 |
| 53 | | 23-Apr-10 | Economic | Data Issues | Appendix H | There is no apparent use of the MDSF tool? Also, if specific strategies have been used, a summary table of these, together with the approval status would be useful. | Can the team please clarify the use of the MDSF tool. Any data on detailed strategies would be useful, including status. | Review of Draft | Jim Hutchison | 10/08/10 | MDSF has not been used to generate damages. This is due to time constraints on processing MDSF and linking with agreed NPD information. The PMG agreed it was less risk to the programme and budget to use a simple methodology prepared for the SMP by Dr J Chatterton with immediate outputs, rather than use MDSF which was started, but was proving very time consuming with low confidence levels in the outputs. There are no strategies in the study area available from which to draw upon. This is covered in Chapter 1.3.1 and H2. Determination of Damages Damages have been determined based on the risk of flooding and/or erosion to properties over the three epochs required for SMP2 using a 'damage assessment' technique prepared by Dr John Chatterton. Numbers of properties at risk have been determined by comparing the National Property Dataset against the maximum flood and erosion extents assuming No Active Intervention. A number of broad assumptions, drawn from the Multi-Coloured Manual and Land Registry have been made to determine commercial and residential average annual damages in May 2009 as follows: - No Existing Protection - May 2009 Price base unless otherwise stated - Once a property is lost through erosion then Annual Average Damages no longer apply, with £175,549 been used as an average value for residential property loss based on Land Registry information - Depth of flooding is taken into account based upon scale of flood | Appendix H3 |
| 54 | | 23-Apr-10 | Economic | Decision Making | Main Report Ch.4 PDZ1 MA12 PDZ2 MA18 | Two policy units in MA12 include HLMR policy options. Likewise MA18 PU 18.3. Without reading the supporting text it is unclear if this is two possible policy options, to be resolved through further studies, or frontages with part HL and part MR? If so, it would be less ambiguous to use "HL with localised MR" or similar, in line with other SMPs. This approach would need to be applied consistently through the SMP. | Could the Project Team confirm that this represents frontages with part HL and part MR? If so, it would be less ambiguous to use "HL with localised MR" or similar, in line with other SMPs. This approach would need to be applied consistently through the SMP. | Review of Draft | Steve Jenkinson | 11/08/2010 | The use of HLMR can reflect uncertainty in the actual requirements for management and it may be that ultimately we are looking at MR with localised HLT, so it may not be consistent in every case. It may also reflect an intent to be flexible in response to rising sea levels through a particular epoch (i.e. to be able to move to MR before the next epoch begins if rate of rise exceeds anticipated rates). The team acknowledges the intent of any HLMR insertions need to be explained within the detailed discussions (text to be reviewed) | No changes |
| 55 | | 23-Apr-10 | Economic | Risks and Impacts | Main Report p5 | The report notes that funding may not be available from the FCRM budget for HL policy options. This is an important caveat to make, but should not be restricted to HL. | Could the Project Team add a further comment, perhaps in Sect 1.1.1, to note the funding uncertainty relating to all proposed activities which are expected to draw on public funding? | Review of Draft | Steve Jenkinson | 10/08/2010 | Text removed from the HLT policy statement and added and amended below in a policy option funding paragraph as follows "Policy option funding in areas where a management intervention has been recommended, it is possible that funding may not be forthcoming from the Delta Flood and Coastal Erosion Risk Management (FCERM) budget. The SMP has highlighted this and also identified what additional opportunities and benefits may be gained from the policy option. Caveats are made in these circumstances highlighting the need for collaborative funding to achieve the proposed management plan. This is discussed further in Chapter 6 and Appendix H." | Chapter 1 |
| 56 | | 23-Apr-10 | Economic | Sensitivity | Appendix H | The discussion on sensitivity here is in my view very limited and not particularly informative, and the reference to "discussed in the main text" not that helpful. Whilst I think there is a challenge in undertaking meaningful sensitivity analysis as part of a broad-brush economic assessment, I feel that there could have been more here on the range of key variables that might impact on preferred policy options. There are likely to be a number of generic variables (erosion rates, flood areas, residual defence life etc), along with some uncertainties that are specific to individual areas. | Could the Project Team consider re-working this section to explain more clearly what the significant economic uncertainties are, their potential impacts and how they have been or will be dealt with? | Review of Draft | Steve Jenkinson | 10/08/2010 | Text added "Much uncertainty is related to the cost of implementing the preferred plan. While it is generally not within the remit of the SMP to define specific works (rather it sets the general intent and agenda for management), a high level sensitivity assessment has been undertaken on the costs in order to identify the impact on the benefit cost ratio. This sensitivity assessment includes adding a 60 per cent optimism bias on the present value cost, included for completeness and as a requirement to consider the guidance provided by the Treasury's 'Green Book'. It is important to acknowledge however that the greatest uncertainty is often the type of work that would actually be carried out under a given policy scenario. The results of the sensitivity assessment are included within Annex H1." | App H and Annex H1 |
| 57 | Showstopper | 23-Apr-10 | Economic | Sustainability | Main Report Ch. 4 PDZ18 lnd | Would like to see the outcome of the economic review and the teams view on longer term sustainability given possible sea level rise, and increased storminess. [There may be other reasons to maintain defences, but not using public funding? If so, can the team please explain?][AP] The report notes that the high-level intent for Scilly should support the adaptation of communities to changing coastal conditions, and flags the need for long-term strategies for adaptation of the populated areas, particularly at Hugh Town. [S.J] | Can the team please briefly set out its findings here? [AP] Could the Project Team clarify what actions will be included in the Action Plan to promote these strategies? Is there an issue with regard to the general sustainability of the islands, and if so has collaboration with other bodies been considered to deliver a multi-agency strategy? [S.J] | Review of Draft | Jim Hutchison Steve Jenkinson | 10/08/2010 | Idea of Scilly FCRM Strategy discussed in PDZ18 and included within the Action Plan, now supplied in Chapter 6. | PDZ18 and chapter 6 |
| 58 | | 23-Apr-10 | Administrative | Affordability | Main Report Ch.5 | There appears to be a limited number of locations where the preferred approach to HL, in between a majority of NAL. This should allow the CSG to prioritise which location are of key importance over the next 5 years, but it was not easy to find any text on this in the plan. | Can the team please explain which locations are a priority in the next 5 years and where this is summarised in the plan? | Review of Draft | Jim Hutchison | 11/08/2010 | Yes there are some clear priority areas which have emerged from the SMP Review. These are High Town, St Mary's, Mounts Bay (Marazion to Newlyn frontage, incl. Marazion Marsh); Fal Estuary; Praa Sands; Hayle; Perranporth; Downderry to Seaton; Mevagisay; Looe; Penzance; Coverack; Portreath; Looe Bar. A summary of these will be provided in Chapter 5. | Chapter 5, pp7 |
| 59 | | 20-Apr-10 | Administrative | Decision Making | Main Report Ch. 4, PDZ 4, 6D-3 | Portsmouth to St. Anthony's Head - why no policy? | Can the team clarify if there should be an entry in this cell? | Review of Draft | Liz Galloway | 11/08/2010 | Not entirely sure what part of document this comment refers to - Portsmouth to St Anthony Head is all part of policy unit 10.1 which has a NAI policy through all epochs as it is all open undefended coast | No changes |
| 60 | | 23-Apr-10 | Administrative | Decision Making | Main Report Ch.5, MA 16, 19 and 23, as 3 examples only. | In this unit, the SMP1 indicated a HL policy option, but SMP2 suggests NAI but its not clear why, and those affected by this change may need some clarity. [Same is needed where we have a change from a positive option to a NAI policy option.] | Can the team please explain and confirm that all such changes are clearly set out in the plan? | Review of Draft | Jim Hutchison | 11/08/2010 | Whenever change from SMP1 HLT to SMP2 NAI (or MR) has occurred, the reasons for the change are provided as an integral part of the detailed discussion in Chapter 4. The rationale for the policy provided in the comment box in Chapter 5 should also provide indication of why a change from SMP1 policy may have occurred. For the examples given, MA16 is heavily influenced by National Trust Policy on allowing natural processes to occur which has meant necessary change away from HLT. At MA19 (PU12) the change is from HLT/Do nothing to NAI but the requirement to provide transition (and hence the change of policy) is referenced. For MA23 (PU23) the justification is given clearly as to why there is no economic or technical reason for public funding of defence, in itself this provides a reason for the change of policy. | No changes |
| 61 | | 23-Apr-10 | Administrative | Engagement | General | The draft SMP provided on CD included a range of mapping accessed through the associated GIS viewer. [S.J] Will there be separate advice prepared to users of the plan on how to use the "software viewer" system? Who is the intended audience? Will the public be able to use it? [AP] Can we make the intended use of this "tool" clearer? [AP] | Could the Project Team clarify: - whether all mapping provided on GIS is or will be provided in "hard copy" (for example pdf) as well? - if it intends providing the GIS viewer and data on the website or making it available on CD? [S.J] Can we make the intended use of this "tool" clearer? [AP] | Review of Draft | Steve Jenkinson Jim Hutchison | 10/08/2010 | Please see response given in the box below which applies to this comment. In addition, clarification text has been added to Appendix k Section 1.1. Section 1.1.2 of chapter 1 already states that the GIS viewer is provided to the operating authorities on CD. | Appendix K |
| 62 | Showstopper | 23-Apr-10 | Administrative | Risks and Impacts | Policy Unit mapping | The policy mapping does not give any indications of erosion risks in the NAI policy units and does not show flood risk areas. The mapping suggesting the main SMP document needs to have this information so that the broad scale risks associated with erosion and flooding under the preferred plan is readily accessible. [AP] There does not appear to be a consistent and complete presentation of NAI baseline mapping for the complete coastline. Some of the inset maps in the PDZ summaries include NAI lines and 1 in 200 yr flood extents for 2105, but only at selected locations? [S.J] | The team should consider adding flood map overlay to final policy maps and adding info on erosion risks to NAI frontages. [AP] Could the Project Team clarify the approach to NAI Baseline mapping - does this reside in full only in the GIS? [S.J] | Review of Draft | Andy Parsons Steve Jenkinson | 10/08/2010 | Detailed discussions with the CSG have been held throughout the study with regards to the best method to present the erosion and flood mapping produced by the SMP, and following receipt of NQRG comments. Due to the length of coastline (especially with much showing little change) and concerns over volume and clarity of mapping the GIS Viewer is the route for the operating authorities to receive the full dataset of erosion and flood data. It is acknowledged that the GIS Viewer is not available to the public and wider users. It is for this reason that Chapter 4 provides extracts of this mapping on a location by location basis in order to illustrate NAI flood and erosion risks, with the chapter 4 supporting text in order to contextualise and qualify the information shown in the mapping extract. Providing the data to the public via the CISCAG website has also been discussed by the CSG based concerns over the public misunderstanding the data. Operating authorities (EA and Cornwall Council) have reported that they are happy to allow members of the public to view the GIS viewer at their offices, or supply selected extracts of mapping if requested. The sharing of this data with the public therefore follows the approach being adopted by the NCRB project with regards to the public viewing lines of maps with LA officers on hand to explain the data. | no change |
| 63 | | 23-Apr-10 | Action Plan | Coastal Processes | Appendix C | The report highlights that there are gaps in the data and information locations around the coast not covered by detailed scheme specific studies. | Can the team confirm that the Action Plan will make reference to the data needs ahead of any review of the plan or SMP3? | Review of Draft | Karen Thomas | 11/08/2010 | The action plan makes reference to data needs at each policy unit where relevant eg monitoring of erosion rates, and also on a SMP wide basis for wider ranging data needs, an example of this is the need to quantify wave action risks along the coastline and to digitise and orthorectify all the 1947 aerial photography held by Cornwall Council. | |
| 64 | | 20-Apr-10 | Action Plan | Engagement | General | Successful implementation of the Plan is likely to require the support of other bodies. | Could the Project Team comment on any Policy Units where third party support is going to be required, and what level of support has been indicated to date? | Review of Draft | Steve Jenkinson | 11/08/2010 | The action plan presents where support is required for each action within the Partners context. Introductory text to the action plan states that "The CSG have approved the Action Plan based on the Preferred Plan. The Action Plan lists the identified measures necessary to implement the intent of management identified by the Preferred Plan. It identifies partners and sources of funding as well as prioritising the actions into Low, Medium and High priorities. Through signing up to the Action Plan, each CSG partner is demonstrating a commitment of intent to undertaking each action, as priorities allow and funding permits. A wide range of sources of funding have been considered in drawing up the Action Plan, which include Environment Agency Flood and Coastal Risk Management funding, Delta Grant in Aid funding, Plymouth Coastal Observatory, Nation Trust, English Heritage, and landowners such as private developers, the Duchy of Cornwall and Wildlife Trust. While the Action Plan does not commit these organisations to providing funding, it does document the wide range of interests that could be involved with investing in the sustainable management of the coastline. Furthermore the potential sources of funding listed in the Action Plan are not exhaustive. All funding routes should be investigated further as the Action Plan is | |
| 65 | | 23-Apr-10 | Action Plan | Engagement | Main Report Ch.4 PDZ1 p.16 | Notes that Par and Par Docs should be identified as "Coastal Change Management Areas" (CCMA), but does not explain why. | Could the Project Team clarify whether CCMA are explained elsewhere in the documents, or add additional text here, so that readers understand the significance of this? Have similar flags regarding CCMA been added throughout the PDZ discussions for appropriate areas (eg. PDZ1 Mevagisay)? Also, have actions been included in the Action Plan to ensure that this is considered within spatial planning? | Review of Draft | Steve Jenkinson | 10/08/10 | Information on CCMA added to planning links section in Chapter 3. CCMA ref from Par docs removed. CCMA flags added to PDZ discussions and included in Action Plan. | 3.4.1 and chapter 6 |
| 66 | | 23-Apr-10 | Action Plan | Monitor/Review | Main Report Ch.6 | There is no draft Action Plan with the consultation version. [AP] There is no indicative or provisional Action Plan included in this consultation draft. [S.J] | Can the team please clarify when this report might be available for the ORG? [AP] Could the Project Team comment on the proposed process for drafting, agreeing and consulting upon the Action Plan? Also that the Action Plan will include inter alia: - lead responsibilities, timetables for actions, approximate costs and indicative funding sources, links to the MTP? - a process for incorporating revised data, guidance or policies? - a process for monitoring progress with actions and success criteria? - links to CLG National Indicator 189? - ongoing communication activities including web management? [S.J] | Review of Draft | Jim Hutchison Steve Jenkinson | 10/08/2010 | The Action Plan has been produced as part of the Stage 5 tasks according to the CSG approved Action Plan template. This covers Action, timescale, objectives, monitoring indicators, partners, priority and funding. The action plan has been produced with key members of the CSG including the 3 Cornwall Council principal engineers and the EA. Upon drafting, the draft action plan was then circulated to the whole CSG group. Any comments received have been incorporated. It is now supplied for NQRG review in Chapter 6 of the SMP. | |