

SMP Title		Approval Required by Regional Director		Lead Contact		Lead Authority		Reviewers		Response		Review of Response		Action Required		Comment provided by		Date comment provided	
SMP No 7 - 3c Lowestoft to Felixstowe (Suffolk)		Richard Houghton		Terry Oakes		Suffolk Coastal District Council		Steve Jenkinson		1. Jim Hutchison 2. Steve Jenkinson 3. Alison Baptiste 4. Stewart Rowe 5. Matthew Bigault 6. Karl Fuller 7. Roger Morris / Jon Curson 8. Emma Fisher		Environment Agency Environment Agency Environment Agency Scarborough Borough Council Communities and Local Government Environment Agency Natural England Halcrow							
Item Number	Sho wstopper	Date Raised	Criteria Heading	Criteria sub heading	Document Reference	Comment	Action Required	Item s of Comm ent	Comment provided by	Response	Section Amended (New para nos and Table nos used in this column)	Review of Response	Action Required	Comment provided by	Date comment provided				
5.1		14-Aug-09				This appendix discusses coastal processes and geomorphology in some detail leading to predictions of shoreline change, but it appears that Section 4 is yet to be drafted? Presumably this will set out clearly assumptions relating to flood risks and erosion rates.	Could the project team advise when Section 4 will be available for review. Also, it would be helpful to explain where in the report the shoreline change assessments are presented in map form.	1	Steve Jenkinson	Agree: Erosion rate maps included in Appendix C as section 4.	See Annex 1 to appendix C, which present maps highlighting the changes.	QRG Review continues on next line in column G							
5.2		16-Sep-10				Comprehensive suite of maps now provided at Annex 1.	Please clarify whether this annex is in place of Section 4. Also, please reference where in the documents the assumptions regarding sea level rise (eg. Defra guidance) and changing flood risk through the epochs are explained.	1	Steve Jenkinson	RH Response 19.11.2010: No the additional maps in Appendix C are not a replacement of section 4, but provide further information on erosion rates. Page C-40 Para 5, explains that the erosion lines have incorporated an allowance for sea level rise, with a 20% increased used to determine the higher erosion rates and a 20% decrease used for the lower erosion case. This then relates through to the tables starting on page C-42. This equally applies to flood areas, although flood damages were taken based on existing EA mapping of flood risk.		QRG Review continues on next line in column G							
5.3		03-Dec-10	Technical	Coastal Processes	Appendix C	As far as I can tell from the various drafts of this appendix and the responses to my comments, the earlier planned Section 4 in App. C, which was due to include standard tables of coastal change, will not be produced. Secondly, whilst erosion lines take SLR into account, the flood risk mapping is based on existing EA mapping and does not vary with policy option. It also appears that the extent of inundation has not been assessed for future epochs allowing for SLR.	Please clarify if my assessments are correct, and if so comment on the impact on decision-making of flood risk areas not taking into account future SLR.	1	Steve Jenkinson	Sorry for any confusion. With respect to section 4 in App C. The maps in App. C map erosion under the different scenarios, together with the present day EA flood risk. The main discussion of the scenarios is in the main SMP document. This approach was agreed by CSG. The flood risk mapping does not vary with scenario as it was agreed that this should show the current understanding of flood risk. The note in Appendix C says "The maps also show the Environment Agency Indicative Flood Zones areas together with identification of key environmental data. Reference should be made specifically to the latest Environment Agency Flood risk mapping in assessing flood risk". The CSG agreed that the SMP should refer people to the EA maps as this avoids confusion. This is highlighted in the main document management area statements: "The explanation of these zones is provided on the Environment Agency's web site www.environment-agency.gov.uk. The maps within this Draft SMP document show where SMP policy might influence the management of flood risk." Continues in adjoining cell	Several different approaches were tried at mapping where SMP policy changed flood risk. This is quite difficult and sensitive in this area where there are many natural defences. In assessing policy, SLR was considered and this is commented on in the main document with respect to individual areas. Damage evaluation, using MDSF, however, was based on existing EA flood risk maps. This was accepted as being in line with the procedural guidance, although it is recognised that in some later SMPs, where critical, this has now included new assessment of water levels in determining damages. We are pleased to confirm that SLR, in future epochs, has been considered in assessing the robustness of the preferred plan and that where this was considered important this did influence policy and the intent of management set out in the plan.								
39.1		14-Aug-09				The SEA (Strategic Environmental Assessment) report does not include a description of the relationship of the plan to other plans and programmes. This is one of the required elements of an Environmental Report as well as being important to understanding how the plan is likely to "fit" with other plans and policies relevant to the location.	Can the team please clarify whether an analysis of the relationship to other plans and policies was undertaken and indicate where this has been reported?	1	Karl Fuller	Agree: Other plans were considered, text highlighted and modified.	See separate Environmental issues response sheet provided earlier.	QRG Review continues on next line in column G							
39.2		16-Sep-10	Environmental	SEA/AA	Appendix F 1.7	Good to hear that other plans were considered. The only focus for this seems to have been the with regard to common effects. Has any consideration been given to the extent to which other plans or policies set a context for the SMP? The problem of a non-compliant SEA remains as it appears to be clear that the policy and plan review has not been documented. An addendum to the environmental report will be required to address this.	Please provide an addendum to address this requirements of the SEA regulations.	1	Karl Fuller	RH Response 19.11.2010: As discussed with Karl Fuller, and agreed with SCDC, work is underway to provide a document (which will be made available on the SMP website alongside the other documents) documenting the "PPP" assessment. This will report the process but does not require external consultation. It contributes to ensuring a "compliant" SEA of the SMP. (Matthew Hunt)		QRG Review continues on next line in column G							
39.3		03-Dec-10				Satisfied with response.	When will the document be available?	1	Karl Fuller	First draft submitted to NEAS 6.12.10. Minor comments received from Ellie Bendall and Sue Brown. Being resolved now and will be submitted SCDC wrc 28.12.10	New document "Suffolk Shoreline Management Plan (SMP2): Assessment of plans, policies and programmes"	Satisfied that document has been produced, but could you confirm when this will be published?		Karl Fuller	15-Dec-10				
40.1		14-Aug-09				There are several concerns regarding the assessment of impacts: a) The separation of impacts into those that are considered minor, positive/negative and significant is welcome, but the criteria that determine whether an impact is significant or not is not clear. How is a significant impact determined? b) On a sample basis the assessment of some of the effects appears to be optimistic/best case. E.g. The first criteria for biodiversity refers to the sustainability of habitat management. For BLY 10.1-10.3 - the sustainability of the system is then used as the basis for claiming a minor positive impact on the condition of international sites and SSSIs (double counting?), despite identifying that the policy will contribute to ongoing decline in condition. The area of Bio-Diversity Action Plan (BAP) habitat is stated to remain the same, but a positive is identified (is neutral more appropriate?). The type of habitat is stated to change - are the habitat types of equal value?	a) Please clarify the basis for determining whether an impact is significant. b) Please check assessment tables to ensure double counting is avoided; assessments are appropriate to the criteria; and conclusions on significance are appropriate to the impact.	1	Karl Fuller	Agree: Clarification added.	See separate Environmental issues response sheet provided earlier.	QRG Review continues on next line in column G							
40.2	Showstopper	16-Sep-10	Environmental	SEA/AA	Appendix F: Table 2.1 Table 5.4 Assessment tables	a) The first question remains unanswered. The response outlines the factors taken into consideration when assessing significance, but there is no indication of the basis of the judgement for an impact being considered to be minor, moderate or major. b) Not satisfied with the response on double counting. The only example responded to is not an example of double counting. Simply asserting that double counting has not occurred and that the assessments are correct does not demonstrate that this is the case. The examples cited indicate that the sustainability of the habitat forms the basis of the assessment for more than one of the criteria, when there is a specific criterion to address this.	a) Please clarify the thresholds or criteria that have been used to classify the level of significance, rather than just the factors considered. b) Further clarification and reassurance is required to demonstrate double counting has not occurred. Addressing the examples cited would help.	1	Karl Fuller	RH Response 19.11.2010: Both points will be picked up within the SoEP currently in preparation. This will include a review of the current findings to further ensure the 'double counting' is not materiality affecting the findings of the SEA. (Matthew Hunt)		QRG Review continues on next line in column G							
40.3		03-Dec-10				Satisfied with action to be taken. However, some clarity in this review sheet would be helpful.		1	Karl Fuller	Satisfaction noted. Point a) is addressed in the SoEP, and the relevant section has been forwarded to Karl Fuller. Any comments arising will be picked up in the final SoEP (produced following current NEAS/SEA review) to be submitted to SCDC by 10 Jan 2011. Point b) The final SoEP will address significant issues/challenges raised by QRG and consultees external to the process. As previously addressed the issue of double-counting is not considered to have been a problem in the assessment. The assessment criteria were agreed with CSG and consultees. There is potential for overlap between the biodiversity criteria, and this was raised by RH very early in the process - however the distinctions (multiple criteria) were driven (strongly) by NEAS and have therefore been interpreted by RH very carefully to ensure that there is no double-counting. I am content that there are degrees of freedom between the assessment criteria (ie a score for one criterion does not also determine the score for another - the criteria are independent, if strongly interlinked). I will ensure the specific points raised are used as an example if possible. MHunt 101215	New document "Suffolk Shoreline Management Plan (SMP2): Statement of Environmental Particulars"	Satisfied	Karl Fuller	15-Dec-10					
Comments on Documents Provided After 1 st Review – WFD Assessment / Action Plan																			
58.1		16-Sep-10	Environmental	SEA/AA	Appendix L 3.1 Assessment Table 3, p 36	For those water bodies already at Good Ecological Potential, the document assumes that a continuation of the current policy is consistent with maintaining this. A similar argument is presented for the elements at good status for the Bure and Waveney water body. It isn't clear whether these conclusions have taken into account climate change. Where HTL policies are proposed, isn't it likely that coastal squeeze would result in a deterioration over the long term?	Please clarify how climate change has been taken into account where it is assumed that present policies are consistent with a continuation of good ecological potential.	1	Karl Fuller	The discussion column within Table 3 refers to sea level rise and coastal squeeze when discussing the Bure and Waveney water body. The water body is designated as HMWB due to flood protection, structures and navigation, i.e. it is accepted that its ecological potential is limited by the continued presence of these features. Yes climate change will exacerbate coastal squeeze, but the water bodies classification as heavily modified accepts that the ecological potential is limited by these features.	No change	QRG Review continues on next line in column G							
58.2		03-Dec-10				The question remains unanswered. Taking into account sea level rise, is it reasonable to assume that GEP will be maintained by a continuation of the existing policy, if so why? The discussion in Table 3 only restates the assumption that because it is currently at good status it will remain so.	Please provide a justification for the assumption that GEP will be maintained	1	Karl Fuller	The heavily modified nature of all water bodies within the SMP area (with the exception of Benacre Broad and Covehithe Broad which are undesignated) and where NAI policies are proposed (Cov 7.17.2) means that it is accepted that ecological potential is limited. This is inherent in the classification of those water bodies potential. In areas where HTL is the current policy, the water body's future potential would have assumed an ongoing management approach (and activity where relevant eg Harwich Approaches), as well as future change (resulted from climate change or other known factors). We are therefore confident that the assessments presented account for all appropriate considerations. The text in Table 3.1 reflects the rationale adopted.	The text in Table 3.1 in the document submitted on 24.11 includes sufficient amendment to reflect this rationale.	Satisfied	Karl Fuller	15-Dec-10					
Date Draft SMP Received: 17-Jul-09		Date Collated review circulated: 11-Sep-09		Resubmission Received: 24-Aug-10		Summary of Review: 12-Oct-10		There are 23 items outstanding. These include 5 Q&P items. Following submission and subsequent review of the WFD Assessment and the Action Plan, 7 main items have been added to the review sheet. Please address all outstanding items and resubmit this review sheet, along with any amended documents to Raahil Javaheri / Jenny Burrey.											
Date Draft SMP Received: 22-Nov-10		Date Collated review circulated:		Resubmission Received:		Summary of Review:		J#											

Item Number	Date	Document Reference (click arrow to select)	Table/Appendix and/or Sub Para number	Matters Identified by Members	Action Required	Comment provided by:	Response from team	Section Amended (New para nos and Table nos used in this column)	SMP Review	Action Required	Comment provided by:	Date comment provided
1	14-Aug-09	Whole report	E.g Glossary Section 3.2, 5th Para Section 3-3, 1st para	There are a number of punctuation errors and in places long sentences.	Please review and amend.	E Fisher	Agreed: CSG has viewed and amendments made.	Changes to typos made throughout SMP and Appendices.	Satisfied		E Fisher	16-Sep-10
2	14-Aug-09	Whole report	Some examples below	Several places where acronyms have been used but not previously defined.	Please review main report and all appendices.	E Fisher	Agreed: Addressed. Comments made by CSG too.	Acronyms included in glossary and references made in text.	Satisfied		E Fisher	16-Sep-10
3	14-Aug-09	Main report Sect 1	N/A	It is the fifteenth page before the main text starts in a 26 page document.	Could the prior pages be streamlined in some way?	Steve Jenkinson	Disagree: All necessary pages - glossary, contents etc. deemed to be required.	No change	Satisfied		Steve Jenkinson	16-Sep-10
4	14-Aug-09	Main report Sect 1	p1.1	What is the significance of the first SMP "working north to south"?	Please clarify.	Steve Jenkinson	Disagree: Just making the point that this review is following the same approach as SMP1 (and the predominant direction of the littoral drift).	No change	Satisfied		Steve Jenkinson	16-Sep-10
5	14-Aug-09	Section 1.1	Para 3	Subcells'	Please correct typo.	E Fisher	Disagree: CSG approved sub-cell	No change	Satisfied as not a key issue		E Fisher	16-Sep-10
6	14-Aug-09	Section 1.1.1	Para 4	Perspective that which?	Please review and amend.	E Fisher	Disagree but Noted.	No change	Satisfied as not a key issue		E Fisher	16-Sep-10
7	14-Aug-09	Section 1.1.1	Para 5	Having...has a'	Please review and amend.	E Fisher	Disagree as clarification not provided.	No change	Satisfied as not a key issue		E Fisher	16-Sep-10
8	14-Aug-09	Section 1.1.4	Last para	MR, use of 'however'	Please review and amend.	E Fisher	Disagree but Noted.	No change	Satisfied as not a key issue		E Fisher	16-Sep-10
9	14-Aug-09	Section 1.3.2	Figure 1.1	Figure 1.1 is not referred to in the text. CFMP boundaries are shown on the figure, but again there is no reference to them in the text.	Please review and amend.	E Fisher	Identified in para 1.3.2	Reference has been made in the main report section 1 Para 1.3.2	Satisfied		E Fisher	16-Sep-10
10	14-Aug-09	Section 2	2.1.1, 2.1.2	Ease of identifying how the SMP meets the requirements of the SEA.	Add in a sign-posting table, indenting the locations in the report.	E Fisher	Agreed	A Navigation template/Index has been included behind the front cover of the main report to map out the structure of the document and appendices.	Satisfied		E Fisher	16-Sep-10
11.1	14-Aug-09	Main report Sect 2	Whole	The main document text on the need for the AA is inadequate. It needs to say what the findings of the AA are.	Include a summary of the findings of the AA in Section 2. Team to review the volume of information included in Section 2, consider moving background text to an Appendix.	E Fisher	Disagree: All agreed with EA NEAS. Further detail provided in SEA and AA appendices.	The details of the AA assessment can be found in Appendix J and the SEA report can be found in Appendix F	QRG Review continues on next line in column F			
11.2	16-Sep-10	Main report Sect 2	Whole	Not satisfied.	The conclusion of the assessment should be added, and some of the existing text could be deleted. It may be worth agreeing this with the NEAS QRG rep?	E Fisher	The CSG agreed that section 2 should only really be defining the need for the SEA and HRA. This is in line with sections 1.2 and 2, where the context of the SMP is explained. Introducing a summary of the findings of the work undertaken as part of the development of the SEA and HRA SMP2 would repeat information provided in the main document. This would create confusion. The structure of the SMP document has been formatted in line with SMP Guidance, to which other SMPs have followed, the three Pilots. Furthermore, to discuss the findings in the introductory sections and we do not feel this is critical and would it definitely delay finalising the document.	No change	Note that the HRA conclusions for coastal sections are now added into the PDZ statements. Satisfied.		Emma Fisher	03-Dec-10
12	14-Aug-09	Main report Sect 3	3.3 for example	Some of the text is cumbersome to read and understand, to the extent that the points being made are almost lost.	Could the project team consider using clearer and plainer text?	Steve Jenkinson	Agree: Section 3 revised by CSG	Section 3 of the main report has been revised, with an introductory section to set out the purpose and need for the SMP.	Satisfied		Steve Jenkinson	16-Sep-10
13	14-Aug-09	Section 4	Whole	No clear referencing to Futurecoast or reports used to compile the PDZ statements.	Add in references.	E Fisher	Agree: FutureCoast mentioned throughout and in Executive Summary	Future Coast and other reports have been referenced throughout the main report, App C and Exec Summary	Satisfied		E Fisher	16-Sep-10
14	14-Aug-09	Section 4	PDZ1, 1-13, Para 2	Repeated sentence: This would need to be assessed in detail as part of the planned development of the area.	Please review and amend.	E Fisher	Agree: Corrected.	This has been corrected in PDZ 1-13 para 2	Satisfied		E Fisher	16-Sep-10
15.1	14-Aug-09	Main report Sect 4 PDZ 1	p. PDZ1.8	The Blinks project is referenced.	Is this project described elsewhere? If not can a short description be added?	Steve Jenkinson	Disagree but Noted.	No change	QRG Review continues on next line in column F			
15.2	16-Sep-10	Main report Sect 4 PDZ 1	p. PDZ1.8	Response noted.	Can the Project Team explain this project by response on this review sheet?	Steve Jenkinson	Sorry for any confusion on this. There is a section in Appendix C (section 2.2.1 Appendix C) which does discuss the emerging findings of the BLINKS project. At the time of writing the SMP, the Blinks Project was not completed and reference to it has been made with respect to papers produced as a result of the emerging findings of the whole project. The summary of coastal processes within PDZ1, does reference Appendix C and the reference to the BLINKS research project in PDZ1 was really just recognition that this was a specific piece of work that gave most up to date information. It is hoped that the discussion in Appendix C resolves this issue.	No change	Satisfied		Steve Jenkinson	03-Dec-10
16	14-Aug-09	Main report Sect 4 PDZ 1	Sect 4.1.5 p.PDZ1.31	It does not seem necessary to repeat the full page note and descriptions on shoreline position etc for each Management Area, especially given the plans have their own key.	Project team to consider.	Steve Jenkinson	Disagree: Requirement of CSG who wanted each policy to be independent series of pages as they have been printed and published separately.	No change	Satisfied		Steve Jenkinson	16-Sep-10
17	14-Aug-09	Main report Sect 4 PDZ 1	Plan p. PDZ.32	The clarity of this plan is not good. For example, Leathes Ham is referenced in the subsequent discussion but is very difficult to see where this is on the plan.	The project team should consider re-formatting this plan, possibly a larger scale is required?	Steve Jenkinson	Agree: Quality improved for Exec Summary	Quality of Maps improved in Appendix C but also within the Executive Summary plans	Satisfied		Steve Jenkinson	16-Sep-10
18	14-Aug-09	Main report Sect 4	P. PDZ 2.9 for example	The policy for the CFMP looks to be a direct quotation. It would be very helpful to put this in a box, use different font or otherwise distinguish it from the main SMP text.	Please consider amending.	Steve Jenkinson	Disagree but Noted.	No change	Satisfied		Steve Jenkinson	16-Sep-10
19	14-Aug-09	Section 5	Figures 5.1, 5.2 and 5.3	What are the categories impactor and hard assessment?	Please define themes in the text.	E Fisher	Described in Issues, features and objectives.	A front end to the Issues Features and Objectives is provided within Appendix E	Satisfied		E Fisher	16-Sep-10
20	14-Aug-09	Section 6	Whole; Policy Plans	There is no clear linkage between the PDZ, the MA's and the Policy Units. [EF] At one level these two plans give an overall broad indication of the policies along the coastline, but are difficult to interpret properly. For example, around the Blyth Estuary. Also, where are the 100yr wpm and Management Area lines? [SJ]	Please review and amend. [EF] The project team should consider re-formatting these plans, possibly a larger scale is required? [SJ]	E Fisher Steve Jenkinson	Agree:	Figures in section 6 showing policy changes have been updated following CSG and RUFF comments.	Satisfied		E Fisher	16-Sep-10
21	14-Aug-09	Section 6.2	Summary Table	It is unclear as to what 'Reviewed Policy' under the heading Present and Previous Policy is referring to.	Please review and amend.	E Fisher	Agree: Reviewed policy refers to strategies or studies subsequent to and following SMP1	Section 6 of main report, Table 6.2 updated	Satisfied		E Fisher	16-Sep-10
22	14-Aug-09	Section 6.2	Summary Table	This table currently links to Chapter 4, yet only MA's and Pus are shown in this table.	Please review and amend.	E Fisher	Agree:	Section 6 of main report, Table 6.2 updated	Satisfied		E Fisher	16-Sep-10
23	14-Aug-09	Appendix A	Page A-12	First mention of RMF.	Define RMF.	E Fisher	Agree: included in glossary	Appendix B.1, second para, RMF added to the list, with descriptive role of RMF added to para four of B-1	Satisfied as not a key issue		E Fisher	16-Sep-10
24	14-Aug-09	Appendix A	Page A-13	First mention of IMF.	Define IMF.	E Fisher	Added to glossary	IMF has been added to the Glossary	Satisfied as not a key issue		E Fisher	16-Sep-10
25	14-Aug-09	Appendix B	Page B-6, Table B.1.1	First mention of TOAL.	Define TOAL.	E Fisher	Agree:	TOAL referenced in Glossary but also in Appendix B, B.6	Satisfied		E Fisher	16-Sep-10
26.1	14-Aug-09	Appendix B	Page B-10, Table B.1.2	First mention of CSG Officers - How do these differ from the CSG?	Define in report.	E Fisher	Agree:	The CSG members are defined in Appendix A, A-4 and A-5	QRG Review continues on next line in column F			
26.2	16-Sep-10	Appendix B	Page B-10, Table B.1.2	It remains unclear as to what a CSG officer is - a representative from the CSG?	Please clarify.	E Fisher	Yes, all members of CSG are officers from partner organisations. For completeness, members of RMF are Councillors from local authorities or members of the EA RFDG.	See ref above.	This has still not been done. Pages A-4 & A-5 detail members of the Project Management Group. If this is same as CSG, then amendment should be made on p.A-4 & or A-5. I doubt such corrections will delay the finalisation of the SMP2, but do not need to see this again. Satisfied.		Emma Fisher	03-Dec-10
27	14-Aug-09	Appendix B	Page B-25	Track changes marked in report.	Delete track changes.	E Fisher	Agree:	A track changed document was provided to the CSG but has not been included as an appendices. Responses to all comments made can be found in the tables attached to Appendix B.	Satisfied		E Fisher	16-Sep-10
28	14-Aug-09	Appendix B	Section B.4.2, Page B-74	June 2007?	Please review and amend.	E Fisher	Agree: Corrected.	App B. 4.2 B-79	Satisfied		E Fisher	16-Sep-10
29	14-Aug-09	Appendix B	Section B.2	Member List defines stakeholders, but it is not clear who made up the CSG, the KSF, the RMF and the remaining stakeholders.	Provide lists in Appendix B.	E Fisher	Agree: Further explanation added.	App A. A-4 A-5 for CSG team, Appendix B - B-16 - 17 for stakeholder list.	Satisfied		E Fisher	16-Sep-10
30.1	14-Aug-09	Appendix C	Figures 1.1, 3.5, 3.7, 3.13, 3.14	Table is unreadable. [EF] These figures are largely illegible. [SJ] Fig 1.1 a useful figure to have as a true record of what has happened since monitoring records began on other studies and strategies, etc, but its text is too small to read. [JH]	Please re-draft to improve image quality.	E Fisher Steve Jenkinson Jim Hutchison	Disagree but Noted.	No change	QRG Review continues on next line in column F			
30.2	16-Sep-10	Appendix C	Figures 1.1, 3.5, 3.7, 3.13, 3.14	Not satisfied. Figure 1.1 cannot be read in pdf format. [EF] Would be disappointing to not have all figures to a standard where they can be read. [SJ] Unclear how CSG came to this conclusion? [JH]	Can the Project Team please re-consider? [SJ] Please clarify [JH]	E Fisher Steve Jenkinson Jim Hutchison	CSG to reconvening on 10 Dec to review.	QRG Review continues on next line in column F				
30.3	03-Dec-10	Appendix C	Table 3.1.3 and Table 3.1.4	This item may require action following the CSG meeting on the 10 Dec. (EF) Await CSG decision on this. [SJ / JH]		E Fisher Steve Jenkinson Jim Hutchison						
31	14-Aug-09	Appendix C	Table 3.1.3 and Table 3.1.4	It is not clear from the text how the erosion rates have been calculated for the NAI and WPM. Do they account for sea level rise?	Please could this be clarified in the text.	E Fisher	Agree:	Clarification of methodology is provided within Appendix C - Coastal processes Section 3	Satisfied		E Fisher	16-Sep-10
32	14-Aug-09	Appendix E	Sect E1	Wrong SMP referenced.	Please amend.	Steve Jenkinson	Agree:	Corrected in Appendix E front end	Satisfied		Steve Jenkinson	16-Sep-10
33	14-Aug-09	Appendix G	Whole	The assessment of objectives completed in Appendix G does not match the PG, this should be included with Appendix F. Appendix G - Policy appraisal should be an assessment of various policies on coastal processes and shoreline evolution.	Move contents of Appendix G to Appendix F.	E Fisher	Disagree but Noted.	No Change	Satisfied		E Fisher	16-Sep-10
34	14-Aug-09	Appendix H	Whole	It is not clear how agricultural land benefits been accounted for within the economic calculations.	Please could this be clarified in the text.	E Fisher	Agree:	Text preceding Economics tables have been revisited in Appendix H. Agricultural costs included within damages in tables. In the Main Report Section 3, 3.1 introduction includes revised text on agricultural land, 3.1.4	Satisfied		E Fisher	16-Sep-10
35	14-Aug-09	Appendix H	Assessment Tables	It would be helpful to state the preferred SMP policy next to the "Preferred Policy" heading.	Please consider.	Steve Jenkinson	Disagree but Noted.	No change	Satisfied		Steve Jenkinson	16-Sep-10
36	14-Aug-09	Section 4	PDZ maps	For each PDZ there are two types of map, location maps and policy maps. With respect to the policy mapping, the terminology can be confusing to the reader. [EF] The 100 yr shoreline position lines are difficult to interpret. For example, the S. pier appears to have a draft policy that agrees with wpm on one side but not the other. It would also be very helpful if the WPM policy was noted on the plan, to aid interpretation of the WPM 100yr line. [SJ] Why only show 100 yr shoreline position? For consistency shouldn't 20 and 50 year zones be shown in line with other SMP2s? Have stakeholders been consulted on this approach? Figure PDZ 2.2 if the red line is predicted NAI erosion, what is the red line?	To avoid confusion, it would be helpful to keep all shoreline mapping to one map, i.e. remove the 100 year WPM management line from the location map. Please could the team explain the difference between: 'With WPM where this differs from the draft preferred policy' and 'Draft preferred policy where this differs from WPM'. [SJ] Could the project team clarify these lines and consider better explanations? [SJ] Could the project team consider amending please? [SR]	E Fisher Steve Jenkinson Stewart Rowe	This was reviewed with RMF and CSG extensively over a period of time. The maps have been amended and revised for the final SMP to suit RMF and CSG requirements.	PDZ maps have been revised and amended in Section 4 PDZ. Additional maps have been incorporated into Appendix C for further clarification.	Satisfied		E Fisher Steve Jenkinson Stewart Rowe	16-Sep-10
37	14-Aug-09	Whole SMP	N/A	As the NECAO SMP2 has been finalised and adopted by the EA, the Northumberland SMP2 is almost complete and the Humber SMP2 also a work in progress, wouldn't this be an ideal time to ensure draft SMPs along the east coast are consistent in format, style and content, particularly in regard to the mapping and description of policy etc?	Please consider.	Stewart Rowe	Disagree but Noted.	No change	Satisfied		Stewart Rowe	16-Sep-10
38	14-Aug-09	Sect 6	Policy Summary Tables	Why are policy changes highlighted in red? What is the rationale behind this? Policy will continue to change (in theory) in light of new data adopting this traffic light approach does this not set a precedent for strategy reviews as well?	Please consider.	Stewart Rowe	Disagree: To clearly highlight changes from SMP1 to where new policies are proposed - a requirement of RMF.	No change	Satisfied		Stewart Rowe	16-Sep-10
39.1	14-Aug-09	Section 4	Section 4.33 pages 22 to 37	The lack of numbering of paragraphs and headings within this section makes it difficult to navigate especially when trying to reference the discussion to support the policy decisions at the end.	Please add more referencing.	Alison Baptiste	Agree:	A Navigation template/Index has been included behind the front cover of the main report to map out the structure of the document and appendices.	QRG Review continues on next line in column F			
39.2	16-Sep-10	Section 4	Section 4.33 pages 22 to 37	I am not sure which document you are referring to re the navigation template, though this seems like a good idea in its own right. However, my comment related to the lack of numbering and headings in the PDZ text itself, and I cannot see any changes here.	Please consider adding some sub-headings simply to help readers find their way about this long passage of text.	Steve Jenkinson pp Alison Baptiste	Format agreed by RMF and CSG over 18 months ago. Sorry but it's just too late to make this sort of presentational change.	Accepted that it may now not be possible to justify presentational changes of this nature (though presumably this comment has been with you for some time?). Satisfied.			Steve Jenkinson pp Alison Baptiste	03-Dec-10
40	14-Aug-09	Section 4	PDZs	The PDZs provide an audit trail for the decision making process behind the preferred policy. For a front-end document, Sect 4 contains a lot of information, which could be placed in an appendix to make it more concise. For example, the coastal processes information, the NAI and WPM scenario reporting could be moved to Appendix C.	Consider moving Section 4 to an Appendix/Annex, e.g. merge into Appendix C, or with Section 5.	Emma Fisher	Disagree: RMF, CSG and stakeholders requested explanation of policy decisions to be included in the main document.	No change	Satisfied		E Fisher	16-Sep-10
41	14-Aug-09	Sect 1	Fig 1.1	Very pleased to see this map identifying spatial relationship of the SMP with CFMP.	It would also be helpful to do a similar exercise for strategies. Could the project team consider this please?	Steve Jenkinson	Agreed but outside remit as this an SMP.	No change	Satisfied		Steve Jenkinson	16-Sep-10

SUFFOLK SMP
Specific Response to NRG Environmental Comments
Some of the comments of the NRG require a specific response to the comment, rather than an addition or amendment to the SMP text. These are provided as follows.
Item 39:
Karl Fuller has requested clarification relating to the effect of other plans in combination with the SMP.
The simple answer here is yes, we did an assessment of other plans and projects. SMPs are however, quite unique plans dealing with foreshore management – the only formal plan for coastal management in the country. Accordingly, identifying common effects with other plans is not straightforward. Based on a consideration of the content of existing plans and emerging documents as part of the Local Development Frameworks, no examples were identified in regard to common effects. The plans support the maintenance of coastal settlements, community infrastructure and the wider environment. These principles are entirely consistent with the objectives of the SMP, and no examples could be found where local policy would provide additional environmental effects in addition to those of the SMP.
Additionally other projects, such as measures to support the implementation of the Habitats Directive (for example the Review of Consents process) and the Water Framework Directive, do not contain any measures which provide for additional or in-combination effects.
I think Karl's point reflects the fact that this should have been explained more clearly within the SEA. But, due to the nature of the SMP, which affects coastal features through coastal processes, no examples were found where synergistic effects could be established.
Item 40:
Karl Fuller has request clarification relating to:
1) How significance was established in the assessment; and
2) The suggestion that the assessment is optimistic and may include double counting.
In regard to point 1, the criteria for establishing significance is provided in the report. We looked at whether effects were significant in that context; were effects permanent or temporary, what was the level of importance of a feature etc. The important thing to remember here, and it is critical, is that SMP provide high level strategic policy for a very long timeline. How matters will be implemented and how the coast will change over 100 years is central to establishing impacts. Accordingly, we provided the assessment based on the assumption that implementation of policy (largely by government) will entail agencies fulfilling their roles. This is considered an acceptable and robust approach, given the nature of SMPs.
To understand the scoring provided, the context above needs to be considered. Within the assessment we have assumed that at the scheme level (where policy is actually implemented) organisations will provide measures to proceed in a manner which avoids impacts. Such impacts can't be specified in the SEA, since the SMP simply provides policy direction, it doesn't specify the type of defence structure for example or the specific nature of a realignment.
It could be equally maintained that in the context of the SMP the scoring is actually skewed towards negativity, for example on a frontage where we are (through policy) protecting a historic settlement with hundreds of listed buildings, dozens of Scheduled Monuments and numerous Conservation Areas through a HTL policy, we would still provide a minor negative overall score, if within that frontage a single listed building was lost. Although the overall policy provides for ongoing protection of a large resource, the loss of a small resource tends to lead to a negative score on a precautionary basis. Such examples exist throughout the SEA, where the focus tends to be on loss, rather than resource protected (since this appears to be the status quo).
The issue of double counting was something that was discussed at length with NEAS in the production of SEAs for SMPs generally. Assessment Criteria have been devised to offer criteria for specific aspects of the environment and a primary consideration was removing criteria which address exactly the same feature. Some may have some degree of overlap, but it is considered that criteria have been refined to a level which offers meaningful assessment, with issues of double counting reduced to a minimum. We could have grouped criteria to address the specific issue of double counting, but it was considered that the assessment would have become more generic and less focussed as a result.
Karl's specific examples are useful in understanding his concerns, but having looked at them and the context of the SMP, I'm content that they remain correct. For example, in relation to BAP habitat being of equal value; in regard to intertidal habitat and freshwater habitat, the target is no net loss of habitat. So in this context the values are the same.
Item 44:
The questions raised by Karl here are:
1) How has the SEA influenced the SMP;
2) How were alternatives assessed; and
3) What was the basis for the secondary analysis of the SMP in the SEA.
1) The SEA was provided on a retrospective basis and commenced when the plan was well advanced. Accordingly, due to the nature of the SMP process and timeline, on this SMP, the opportunities for shaping the SMP through the SEA were minimal.
2) The issue of considering alternatives has been the topic of much discussion between the project team and NEAS. It is simply not considered appropriate to consider each of the four SMP policy options for each unit. This would require a massive assessment, especially where permutations of policy apply. Additionally, the level of assessment and the actual available options are defined through the Policy Appraisal process of the SMP. In the Suffolk SMP, this process was not informed by the SEA, and the criteria for assessment are similar, but not the same. In future SMPs, Royal Haskoning have advised NEAS, that it may be prudent to use the Scoping Report of the SEA as a key process in SMP Policy Appraisal. This would ensure that the options are addressed in response to assessment criteria. As it stands, to repeat the appraisal process for this SMP would have been a lengthy process, and a more considered and appropriate approach was to consider actual alternatives to management at an appropriate scale. The background discussions used in other SMPs are relevant here and are provided below:
Text relating to consideration of options from the Essex SMP
The function of a SMP is to consider the coast as a whole from the perspective of managing coastal flood and erosion risk. The behaviour of the Essex and south Suffolk coast is driven by its geological make-up and it is therefore, evident that not one aspect of the coastal environment (in terms of its physical behaviour, natural or built) dominates. There is a complex interdependence between different values along this linear coast, which, put simply means that a decision taken within one SMP PDZ or MU has the potential to affect multiple adjacent units. It should also be remembered that the SMP structure is to provide strategic management at the MU level – the PDZ's simply providing the discreet units to support this.
The pertinent question is therefore, should the assessment be provided at the MU or PDZ level. The most appropriate approach would appear to be at the MU level, so the collective impacts of the SMP could be evaluated within a management context (the management of an estuary or area of open coast etc). Equally, the assessment at an MU level provides for an appropriate depth of assessment. This plan contains 10 MUs and 101 PDZs. As a result, if SMP policy at each PDZ was to be assessed individually and in-combination, then there would be a multiplier effect along the coastline such that each PDZ would need to be assessed not only for the four options detailed above, but for each option in combination with one of four options for the two adjacent management units.
This would result in each policy unit (of which there are 101) being assessed 32 times, resulting in a total of 3232 assessments. With respect to this, it was therefore, considered inappropriate and unmanageable for a simple and rigid procedure of policy appraisal to be applied to each SMP option at the PDZ level. Further rationale for this decision was based upon the fact that in many PDZs, only a limited number of policy options are actually appropriate; for example, a policy of managed realignment would be wholly inappropriate for a heavily populated conurbation, as would a policy of advance the line on a dynamic and natural shoreline. As such, the assessment of each SMP policy option for each PDZ was deemed too unwieldy and therefore unnecessary within the context of a SMP, especially when the "spirit of SEA" was applied throughout policy development.
The key factor here is that the alternative approaches to management, have been considered within the SMP processes, according to SMP guidance. Whilst this process does not use the same terminology as the SEA process, and the manner in which alternatives would be assessed differs from a simple SEA based assessment, the SMP nevertheless provides a rigorous and robust consideration of the feasible options for management. This process, the options appraisal exercise within the SMP, provides a clear account of how options been evaluated and should be sourced for an understanding of how policy has developed.
3) The selection of four negative scores to provide secondary assessment was developed in discussions with NEAS to provide some scope to the assessment and to enable the assessment to focus on issues which were considered of a magnitude requiring assessment in addition to the primary assessment. The primary assessment already picks up on all issues on a frontage basis (so nothing is missed). The secondary analysis simply enables pervasive issues to be addressed in order to cover issues which are repeated throughout the plan area. This was a matter agreed in regards to scoping the assessment. This approach is precautionary, since the impacts of the plan have already been considered for each frontage. This assessment provides an additional step to establish if impacts which are repeated throughout the plan need additional consideration.
Items 41 and 45
Roger Morris here questions the provisions relating to measures at East Lane (and effects on habitat) and sustainable habitat creation in the Alde-Ore and Deben. The provisions relating to East Lane and also locations for habitat creation (within the plan) have been the topic of ongoing discussions with the CSG and Natural England within that group. The plan has progressed on the basis that NE have demonstrated support of these elements of the plan. It would not therefore seem appropriate to revisit matters on which there has been agreement with NE.
13-Jan-10

