

Cornwall and IoS SMP2 consultation documents comments form



Document Title:	Cornwall and IoS SMP2 Task 4.1 Approve the draft SMP2 in principle			Project No.:	9T8801	To be returned to:	Julie Davies j.davies@royalhaskoning.com	
General Comments:				Reviewer:		Organisation:		
Comments								
Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date	
Page 6 top para (1.1.4)	For MR explanation, it is not clear what "A situation where at one unit there is a HTL policy and that in doing this, the coast in an adjacent unit is allowed to function more naturally" means. Need for Plain English (e.g. replace liner defence with sea wall).	Remove last example. Incorporate Defra definition - allowing the shoreline to move backwards or forwards, with management to control or limit movement of the shoreline.	J Payne	05-May-10	Last example removed. Summary words added which used the suggested text. Linear defence replaced with sea wall.	J Davies	28-Jul-10	

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This chapter appears to be a description of process, there is no indication of the SEA results, this could do with being included somewhere in this chapter even if just as a summary.

There is no consideration of UK BAP habitats and the role Cornwall SMP could have in delivering nationally and locally agreed targets. For instance, this section could highlight the scale of sand dune habitats and how Cornwall could significantly contribute to enhancement and protection of the nation's resource of these. This may then support Dune Management as part of a coast protection strategy for Cornwall and the Isles of Scilly. Reference to BAP habitats is important as it is one of the Grant in Aid Outcome Measures and so has implications for scheme and strategy funding and prioritisation.

The section could do with a summary of Appendix F (once it has been revised to reflect impacts and benefits in relation to Natura 2000, UK BAP, SSSI and other designated habitats).

Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date
2.1.1 & 2.1.4	There is no mention of UK BAP habitats, e.g. dunes (which are referred to as particularly important to the SMP in the Coastal Processes report), nor operating authorities requirement to deliver on BAP targets which for coastal and intertidal habitats should be highlighted in the SMP.	Include list of key BAP habitats and relevant targets, include an indication of Cornwall and IoS BAP habitats within the national context in section 2.1.1, and add a note on relevance via GiA Outcome Measures	J Payne	05-May-10	Have included text section and Table identifying UK BAP habitat types relevant to SMP (& Cornwall IoS) - Section 2.1.1 pp.5-6	JR	18-Oct-10
Throughout	MA is used for Management Area. Given the number of acronyms in this chapter, it would be better plain English to say this in full - especially as it is purely a SMP term not one of common usage like SAC and SSSI.	Replace 'MA' with Management Area	J Payne	05-May-10	changed The whole of section 2.2 describes the SEA and the objectives for undertaking SEA as part of the SMP process? Have inserted references to the relevant Appendix for clarity.	JR	18-Oct-10
-	There is no reference to Appendix F the SEA, which is the one thing this Chapter should reference, and summarise.	Include a reference to Appendix F the SEA in sections 2, 2.1 and 2.2. Also include a summary of key impacts.	J Payne	05-May-10		JR	18-Oct-10

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This section needs to include notes on the linkages between the SMP and land use plans and transport plans, especially given the consideration of wider sustainability and community issues and how these affect policy development.

Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date
Table 3.1	Known flood locations does not include:- Truro, Hugh Town , Penryn, Fowey, Golant, Lerryn, Portmellon	Add extra locations to table 3.1, especially Truro and Hugh Town	J Payne	05-May-10	locations suggested added to table 3.1 (note Fowey was already listed)	J Dunstan	28-Jul-10
3.1.3	The Natural Environment section needs to reference BAP habitats and UKBAP objectives. MA is used for Management Area. It would be better for plain english to say this in full. This is especially true in this section where the text rapidly introduces convenient terms of PDZs and MAs, and equally quickly launches into their acronyms.	Add to Natural Environment Section: Not all of the UK's priority species and habitats are found in designated areas, and while management of special sites and the wider countryside are pre-requisites of securing future biodiversity, experience shows that targeted action can deliver sustained improvements to the status of species and habitats. The UK Biodiversity Action Plan partnership is committed to achieving this by identifying priorities and assessing progress at a UK level, setting targets and identifying action at a country level, and implementing action at country, regional or local level as appropriate. Of particular relevance to the Cornwall and Isles of Scilly SMP are Coastal and Floodplain grazing Marsh, Sallmarshes, Sand Dunes, Intertidal mudflats, and Saline Lagoons.	J Payne	05-May-10	Text as suggested added below table 3.2	J Dunstan	28-Jul-10
3.4.3		Replace 'MA' with Management Area	J Payne	05-May-10	Action completed for this chapter. The text states how creation of policy drives the grouping of policy units into Management Areas as so this order of section 3.4.2 and 3.4.3 has not been changed.	J Dunstan	28-Jul-10
3.4.2/3.4.3	It would be more logical to introduce the Management areas before the policy units.	Swap 3.4.2 with 3.4.3	J Payne	05-May-10	Wording in section 3.6 amended to improve signposting of policy option and implications summary, and action plan within the document.	J Dunstan	28-Jul-10

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There is insufficient and unclear direction to the Land Use Planning System. Any area for MR is likely to have Land Use Planning implications that need explaining. Locations for possible Coastal Change Management Areas should be included. Identifying the need for a CCMA and Area Action Plan at Mounds bay is essential. *RH RESPONSE: References to Land Use Planning have now been inserted, as per the suggested text edits, for all appropriate Policy unit discussions JR 18/10/2010*

The Agency highlighted at the outset that details of the flood mechanics at Perranporth was a significant issue that the SMP needed to comment on. The assessment has totally failed to consider or review these concerns and does not reflect the high flood risk threats to the community and significant climate change adaptation challenges that this presents. Significant issues that were raised in the stakeholder engagements and Issues and Features review need to be taken on board. *RH RESPONSE: The first iteration of discussion at Perranporth made explicit reference to flood risk being driven by waves (particularly long-period swell) and the affects of wind set up. This has been reviewed and improved following comments during consultation. HUK made efforts to provide video evidence of the mechanism by which flooding occurs at consultation event to stimulate further discussion. A full assessment of the complex hydrodynamics which lead to flooding are outside the remit of the SMP and need to be tackled by a bespoke study of the risks at Perranporth. JR 18/10/2010.*

Both the analysis of the Loe Bar evolution and implications for future management of flood risks at Helston are not acceptable. The analysis incorrectly assesses the landward edge as static, yet there is clear evidence of significant landward migration. The conclusion that the height of the bar should be allowed to rise will result in increasing flood risks to Helston. This section needs to be revised. *RH RESPONSE: This section has been reviewed and text significantly revised, clarifying the intent of management and the flood risks to Helston and inundation risks to the SSSI. JR 18/10/2010*

There is no mention or mapping of MHWS in the future at any settlements. This is needed both to explain the risks to communities, but also to inform the land use planning system which needs to understand areas that will be at risk of permanent inundation for the identification of Coastal Change Management Areas. Examples needing reference of this are Mevagisey, Looe, Flushing etc. *RH RESPONSE: Projecting MHWS into the future epochs for settlements was not within the remit of the SMP (it was agreed only to map MHW / MLW projections for habitat locations). The 1:200 yr scenario was projected for settlements. Efforts have been made to make reference to the implications of future MHWS at the locations mentioned (and others). JR 18/10/2010.*

Flood warning is highlighted for improvement at a number of locations. However, it is not clear if this is identified as it is the most effective flood management tool for these locations or whether the SMP review has highlighted this as a particular weakness. If it is the latter, the Agency needs to be given clearer direction. *RH RESPONSE: The ongoing EA FIM programme to provide a more community based flood warning service provides the basis for these suggestions. The SMP aims to support this where possible. A section of text has been added within the introduction to Chapter 5 to provide some expansion on this point. JR 18/10/2010.*

Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date
PDZ introduction	Why have the high level objectives repeated at each PDZ?	Include High Level objective only once at the start of Chapter 4, delete all repetitions.					
MA2 detailed discussion - Portwrinkle	Could do with clear direction to transport and land use planners	Add to second paragraph, page 13; "This gives time for Transport Planners to consider alternative access arrangements. The approach may also require Land Use Planning policies to facilitate any necessary roll back of property from out of the risk zone. Whilst the number of properties at risk is not great, the impact on the historic harbour, conservation area and road access through the village constitutes a significant coastal change to this community and consideration should be given to classifying this a Coastal Change Management Area in the Local Development Framework."	J.Payne / C.Dyke (Cornwall Planning)		have added text as suggested.	JR	9-Aug-10
MA2 detailed discussion - Downderry	The discussion at Downderry needs to confirm the effects of HTL on the presence of a beach, there is a significant reduction in foreshore width where the Council defences are, and a much healthier and wider beach where no defences or set back private defences are. Historic photos support the view that the defences are at least partially responsible for this foreshore width. This issue will be important in balancing the future direction for Downderry. If loss of properties is just on cost benefit grounds there may be community wide resistance to the policy. However, if as appear likely, that protection of a few properties will result in the loss of the tourism and amenity beach for the whole community, the verdict may well be different.	Confirm the likely long term effect of HTL on retention of a beach for tourism and amenity Suggested text:- "Under a future managed realignment policy, Downderry will be subject to significant coastal change. As such, the Local Development Framework should consider identifying this as a Coastal Change Management Area, in order to facilitate roll back of property and infrastructure away from the area of erosion risk. Transport Planners should also consider options for re-routing the B3247."	J.Payne / C.Dyke (Cornwall Planning)		Yes this is an important point and for coastal defence as well. Have included text to highlight this issue. Have also made much clearer reference to current monitoring and reported low erosion rates. Have made reference to CC 'Action Line' etc.	JR	9-Aug-10
MA2 detailed discussion - Downderry	Direction on the Land Use Planning system must be given here. Confirm if this is an area of significant coastal change, and as such should be considered a Coastal Change Management Area. Direct that the land use planning system can deliver an effective roll back policy and approach for Downderry.	Replace: "The preferred plan may require either realignment of the road or development of robust resilience to flooding. Any realignment undertaken should not reduce the capacity of the river to discharge" with: "The preferred plan supports realignment of the road. Any realignment scheme should aim to reduce flood risks upstream of the road bridge by improving alignment, capacity and design. This should also provide an increased width for the beach to adjust to rising sea levels."	J.Payne / C.Dyke (Cornwall Planning)		Ok - have added text at end of discussion, pp 20	JR	10-Aug-10
MA2 detailed discussion - Seaton	Positive benefits of MR of the road at Seaton have not been noted, but should be the focus of any MR scheme here. This has been raised by the Agency and the Elected Members as a flooding concern and should not be ignored. See note below for Plan summary and alternative suggestion.	Change policy from HTL, MR, NAI to MR, NAI, NAI			Have replaced text as suggested pp 20	JR	10-Aug-10
MA2 Policy and detailed	We would support MR in the short term to provide flood risk benefits as soon as possible.				Policy changed in line with discussion as indicated	JR	10-Aug-10
MA2 Implications w.r.t built environment - Seaton and Downderry	Short term costs for maintaining existing structures over 20 years is considered twice as expensive as removing the same defences and maintaining the new road for 30 years. Yet text says move to NAI is assumed to cost the same as HTL maintenance. Then there are long term costs given for NAI.	Please check and review costs.			Policy has changed to MR. Text refers to the assumptions made for the benefit / cost given as 1.62	JR	27-Aug-10
MA3 detailed Discussion - Pararaph 4 Looe	Flooding appears fundamental to future of Looe as benefit/costs do not support the Plan. The text includes "To provide flood risk management which sustains the commercial viability of the fishing fleet and quays, the tourism interests of East and West Looe, the conservation area of East and West Looe and the many Listed Buildings and Scheduled Monuments lying within the flood risk area is important." This is an incomplete sentence that doesn't conclude what is needed from flood risk management. Later the text says that technical solutions are likely to be complex, this needs to be expanded on and explained. How is the Plan to be delivered if not through GIA?	Clarify statement on tidal flood risk. Include a direction on management of tidal flooding (explain what is meant by complex solution). Include a direction on likely future frequency and depths of flooding. Justify in text lack of benefit/costs and how this is to be overcome?			Have expanded comment and have added detail from East & West Looe Tidal Defences Options Appraisal report (2001)	JR	27-Aug-10
MA3 detailed Discussion - Looe	The discussion needs to highlight the role required by both flood risk management and the Land Use Planning System. Whilst this area wouldn't count as a Coastal Change Management Area (since HTL), there nonetheless should be a direction on the Land Use Planning system to support sustainable community adaptation in the face of sea level rise from climate change. This probably needs to replace the sentence "Looe is therefore likely to be subject to major studies and works over the period of epoch"	Suggested text:- "The Local Development Framework should include policies to support the adaptation of Looe against rising sea levels due to climate change. This may require changes to land use type as well as improved community resistance and resilience measures, which should also be considered in any Town Strategy. Cornwall Council and the Environment Agency should, in partnership, support the CFMP action to investigate measures for reducing flood risk at Looe from tidal and surface water flooding."	J.Payne / C.Dyke (Cornwall Planning)		Have added suggested text on p27	JR	27-Aug-10
MA3 detailed Discussion - Looe	The discussion fails to mention the role of beach as a coast protection and its relationship with eastern harbour wall. This has been discussed with CSG and EMF as a strategic issue.	Add a note explaining the role of the beach for coast protection. Check this has been included in cost/benefits. Suggest policy change from MR, MR, NAI to HTL, MR, NAI. Suggested text:- "The baseline scenario testing shows that the current defences may be at risk in the medium to longer term. It is proposed that in the short term erosion and sea level rise trends are monitored and the pressure on the defences reviewed in detail as a result. This would determine the scale of any necessary Managed Realignment, which may require either narrowing of the defence structures and Marine Drive, or if more significant pressures are demonstrated, the future need to re-route access to Hannafore by an alternative inland route."			Text expanded to describe strategic CP role of the beach and relationship with E harbour wall	JR	27-Aug-10
MA3 Hannafore	Following feedback from public consultation, review justification for MR in the short term. If the defence structure is considered to be under no short term threat, then only propose move to MR later. This would allow a monitor approach to determine how significant the pressure on the defences will be, this might show MR can be achieved without re-routing Marine Drive but just by narrowing the road and defence arrangement.				Yes the policy has been amended here to reflect consultation discussions. The suggested text has been integrated into discussion to help clarify.	JR	10-Aug-10

MA4 Fowey Polruan	The section says a Flood Alleviation study is planned for Fowey and Polruan. Is this being done by Cornwall Council as the EA is not aware of this. The Agency does have a study planned for the Quay frontage at Fowey in Year 5 of the Medium Term Plan This was originally taken as HTL. When questioned it was conceded that cost benefits did not support this, and NAI was taken to EMF with statement that justification for continued defence is unlikely. Now it returns as HTL with statement that it meets socio-economic objectives. However Chapter 5 gives this as NAI, NAI, NAI. What is correct and where is the evidence (Economic assessment says nothing on this)? Does this justify a policy unit of its own, given the uncertainties on its value? If clear and consistent reasoning can not be applied here, this Policy Unit should be deleted and incorporated into Fowey Policy Unit.	Delete if incorrect, otherwise reference source.		Have referred to CC intention at Fowey (M Clem)	JR	27-Aug-10
MA4 Readymoney Cove	In the long term if the structure is lost there may be the potential for UK BAP habitat creation in the form of coastal saltmarsh (up to 1 ha) What is meant by aim to sustain current flood risk levels?	Ensure Chapter 4 and 5 policies are consistent. Justify HTL if this is now proposed. Alternatively consider removing the policy unit and including within Fowey Policy Unit.		Readymoney Cove now part of Fowey Policy unit	JR	27-Aug-10
MA4 Polridmouth		Suggested Text. "The loss of the Decoy Lake may, however, provide scope for UK BAP habitat creation in the form of Coastal Saltmarsh."		Text added	JR	27-Aug-10
MA5 Gollant		Explain or delete comment.		comment deleted	JR	27-Aug-10
MA5, page 13 PDZ3.	There are references to PDZ 3 MA05 Gribben Head to Par Docks, as well as this being MA 06 as it should be.			Not sure what this refers to.	JR	31-Aug-10
PDZ3 Environment and Nature Conservation	It is noted that there are only BAP habitats here. These should be referred to - Par Dunes at the very least. This states that there is no reason to suspect that the dunes at Par will significantly change over the next century. The following table then concludes that the Dunes will recede up to 100m by 2105. Presumably the first statement refers to the dunes overall robustness, rather than physical location and width. Given the landward constraint of holiday park and haulage road embankment, and BAP habitat designation, the first statement needs to be made clear and consistent.	Suggested text:- Par Sands represents some 10ha of active BAP dune system. This is backed by a nature reserve, area of standing water, reed beds, marshy ground, scrub, woodland, and plantation. The dunes are thought to be under pressure from the Holiday park, car park that back the dunes and from paths through the dunes		text added	JR	31-Aug-10
PDZ3 Unconstrained scenario		Provide a clear statement on the impacts and future pressures on the BAP habitat as a result of the SMP policy and what actions are required to protect or enhance the site.		Have clarified the statement made in the 'Unconstrained Scenario' section. Have identified importance of BAP habitat and that additional area for migration will potentially enhance the site in longer term.	JR	31-Aug-10
MA06 Detailed discussion - Polkerris	This section must include a direction on the Land Use Planning system to support Community Adaption and potential roll back. It may not be significant enough to be identified as a Coastal Change Management Area, but if this is not the case some master planning and community engagement will be required. This is noted in the summary table but would be improved by inclusion in the main discussion text. With the impacts on the sand dunes and holiday park, this may be enough to trigger needing a Coastal Change Management Area to be identified. The last sentence gives the direction but no justification. Failing this being a CCMA, the Land Use Planning system should be directed to address community adaptation in the face of sea level rise from climate change. This should be linked to any Par/St Blazey Flood Strategy by the Agency, which should also support the planning system.	Add as final paragraph suggested text:- As noted, the coastal change impacts are consider significant to the community and as such the Local Development Framework should identify Polkerris as a Coastal Change Management Area to support community adaption against climate change.	J.Payne / C.Dyke (Cornwall Planning)	Have added text	JR	31-Aug-10
MA06 Detailed discussion - Par	The Agency does not support short term HTL at Par Docks. Any regeneration as part of the Eco-town will occur in the short term and then will offer no opportunities for change for at least another 50 years. Therefore if there is to be any MR to allow a future NAI approach this MUST be in the short term.	Suggested text:- With landward migration of the dunes by up to 100m in 2105, that could directly impact on the Caravan Park and hence the economy of Par, the Local Development Framework should consider whether to identify this area as a Coastal Change Management Area. Certainly it should provide direction on the future adaptation of Par and St Blazey from increased flood risks due to climate change. This should include reference to any Par and St Blazey Flood Risk Management Strategy.	J.Payne / C.Dyke (Cornwall Planning)	Have added text	JR	31-Aug-10
MA06 Detailed discussion - Par Docks	Par Docks will not qualify as a CCMA under the definition of PPS25.	Amend policy to MR in Short term, NAI in medium to long term.	J.Payne / C.Dyke (Cornwall Planning)	Policy has been changed	JR	31-Aug-10
MA06 Detailed discussion - Par Docks		Delete reference to Par Docks as a CCMA. There is no significant coastal change, just development change which is not the concern of a CCMA. Suggested text:- "With up to 100m of beach recession predicted in the area of the Caravan Park and Holiday Camp, Pentewan may be appropriate for consideration as a Coastal Change Management Area by the Local Development Framework. If it is not defined as a CCMA, there will nonetheless need to be a development plan lead adaptation strategy for the village and holiday park to respond to rising sea levels from climate change. This should be addressed further in any Village Strategy. These may be supported by the tidal risk management study proposed by the Environment Agency in its Medium Term Plan."	J.Payne / C.Dyke (Cornwall Planning)	Reference deleted	JR	31-Aug-10
MA08 - Discussion - Pentewan	This needs a note to prompt Land Use Planning to consider Pentewan for adaptation against climate change, with potential need for Master Planning of the response to this. Is sand dune creation an option at Pentewan beach? There is 3ha of area in both epoch 2 and epoch 3 erosion extents that might be developed as sand dune, this is a significant Outcome Measure score. The advantage for the holiday park may be reduced loss of usable land, a sand dune feature in front of the site, and possible support on funding; for UK Pic this may gain some sand dune habitat. This option might also support funding for MR at the Harbour, and facilitate a Pentewan wide approach, rather than the two part solution proposed.	Consider amending beach policy to NAI, MR, NAI/HTL. This would require substantial text changes - to be discussed. If change not supported then as a minimum, add a middle sentence to last Pentewan paragraph on page 7: "Consideration should be given to creation of sand dunes to help defend the holiday park. Due to the habitat gains that this may provide, this alternative to no active intervention would be considered a sustainable coastal management approach and hence may offer some Grant in Aid funding contributions."	J.Payne / C.Dyke (Cornwall Planning)	Have added suggested text on p.16	JR	1-Sep-10
MA08 - Discussion - Pentewan	The section needs to note that regardless of Shoreline Management Policy - there is a need for adaptation to sea level rise at Mevagissey. This will need to be considered by the Land Use Planning System in conjunction with any Flood Risk Management Strategy or Scheme. Options will need to consider property level flood resilience, and changes of use to less vulnerable land use types. The section notes a commitment 'to invest further funding into the assessment of both tidal and fluvial flood risks at Mevagissey'. The SMP needs to direct this to consider MR proposals as these are not considered in the current pre-feasibility report. The Pre-feasibility also highlights the need for tidal monitoring, this should be mentioned to support Coastal Monitoring.	Suggested text:- "The Land Use Planning system, and any community strategies, must determine a sustainable long term approach for the adaptation of the whole of Mevagissey to climate change. This should be informed by any further Flood and Coastal Risk Management assessment as well as the current pre-feasibility report. This might consider use of a Community Infrastructure Levy to provide large scale structural changes to the village and harbour."	J.Payne / C.Dyke (Cornwall Planning)	Have changed text / discussion in light of changes to policy	JR	1-Sep-10
MA08 - Discussion - Mevagissey	The Pre-feasibility highlights significant funding issues that need to be resolved. The last sentence says that it is considered that there is economic justification to continue to HTL/MR. What does the economic assessment demonstrate that the pre-feasibility didn't find?	Suggested Text to follow note on commitment for further assessment: "Any such assessment should consider Managed Realignment options, including changes to the harbour structure arrangements, and must link in to the Land Use Planning system. The pre-feasibility study has also confirmed that assessment requires further tidal monitoring support from the Coastal Monitoring Programme to inform options and risks."	J.Payne / C.Dyke (Cornwall Planning)	Have ammended text / added suggested to highlight this priority.	JR	1-Sep-10
MA08 - Discussion - Mevagissey		Revise last sentence, and include evidence from Economic Assessment of affordability of HTL/MR.		Text added	JR	1-Sep-10
MA08 - Discussion - Mevagissey				Have ammended economic statement to reflect problems with affordability.p.17/18	JR	1-Sep-10

MA08 - Discussion - Portmellon	As noted in previous feedback, there are more than the one or two properties quoted as affected by flooding. In October we said "whereas the actual number shown is closer to 9 buildings with one being a set of flats. Erosion maps show the 4 terraced houses, the pub, and one house opposite this at risk. There is currently major wave action at this location that pose a clear threat to the terraced houses."	Replace "The flooding however is not anticipated to affect more than one or two properties due to the steeply rising nature of the topography." with "there are at least six properties at risk of flooding, for which wave action poses a significant risk."		Have amended text to reflect true magnitude of risks and wave action issues.	JR	1-Sep-10
MA08 - Discussion - Portmellon	We also noted in October: The road access between Mevagissey and Portmellon now goes inland following Penware Lane, then Portmellon Park - hence there is no requirement to upgrade Portmellon Park as suggested. The smaller southern side of Portmellon is served by an inland road to Gorran. As such, the loss of the waterfront road to erosion only impacts on the connectivity of the two halves, not a principal access route. Road realignment inland is said to be constrained by the presence of significant development". But the valley bottom inland of the small waterfront terrace is totally undeveloped (although it is a saltmarsh). Connection of Portmellon Park road across this valley appears fairly straightforward, the only issue would be going up the southern side of the valley, but there is an undeveloped field that could connect up to Bosprennis. Realignment here could provide UK BAP habitat benefits if designed sensitively.	Replace "However realignment of the road to a more resilient position would not be an easy option, given the presence of significant development immediately to its rear. The retaining walls of the road also effectively provide defacto defence for the property and development behind it - without it this would also be at risk." with "Realignment of the road from Portmellon Park Road up towards Bosprennis should be explored. Any such realignment scheme should also look for UK BAP coastal habitat creation or enhancement." Make last three sentences a new paragraph. Add to end of second sentence, "by both Cornwall coastal engineers and Transport Planners." Add final sentence; "Land Use Planners should facilitate adaptation to climate change, which given the impacts on the connection to the two halves of the village, and importance of the frontage to the nature of the village, should be considered as significant coastal changes."		Have amended text and added suggested insert.	JR	1-Sep-10
MA08 - Discussion - Portmellon	A note that Land Use Planning should support climate change adaptation and possible roll back of road and properties.	Replace sentence "The road is not seen as a strategic route although locally it obviously has importance." with "The road is not a strategic route and an alternative inland route is available." Put West Portholland in a separate paragraph.	J.Payne / C.Dyke (Cornwall Planning)	Have amended text and paragraph, added suggested text.	JR	1-Sep-10
MA09 - Discussion - Caerhays	AONB see benefits from allowing dune systems to develop and to reduce landscape impacts of the car parks. Support for dune development as a BAP habitat should be included in the discussion as a positive.	Confirm SAC boundary with NE.	J.Payne / C. Holden (AONB)	Text added, MR now referred to as preferred policy through 3 epochs	JR	1-Sep-10
MA09 - Discussion - Portholland	Cornwall Highways have confirmed that they do not see a need to retain the road between the two Portholland's as there are alternative access arrangements. As such monitoring of cliff erosion between the two settlements may not be a priority. Is HTL in epoch 2 therefore the most appropriate, what about NAI but accepting local upkeep if desired with no knock on impacts. Check extent of Fal and Helford SAC from NE records. HRA elements may not be relevant if boundary of SAC is Zone Point. EA shapelfile may be wrongly incorporating Carricknath Point to Porthbean Beach (SSSI)	Replace sentence "The road is not seen as a strategic route although locally it obviously has importance." with "The road is not a strategic route and an alternative inland route is available." Put West Portholland in a separate paragraph.		Text added, paragraphs amended	JR	1-Sep-10
MA09 - Environmental Assessment pages 27, 28	There is no mention of wind set up in Easterly conditions of 200-300mm greater at Penryn than Falmouth. This was flagged up previously. Given low standard of protection at Penryn this is important (is equivalent to the difference between a 1 year level and between a 5 year and 10 year level. This is in direct contradiction to Section 2.4.4 of the ABP Estuaries report that claims the same level in all locations in the estuary.	Confirm SAC boundary with NE.		Need to firm up on this		
PDZ5 - Wave Climate/ Tidal Flow Appendix C ABP Estuaries section 2.4.4		Add text to Wave Climate or tidal flow. "Extreme water levels at Penryn can be elevated significantly above levels at Falmouth when combined with easterly and south easterly winds. This wind set up has been recorded of up to 300mm at Penryn. Any development or scheme proposals should take this into account in any assessment of flood risk." Amend ABP report with equivalent. Suggested text; "Truro is served by an interrelated arrangement of tidal and fluvial flood defences. The Tidal defences include flood walls along Lighterage Quay, raised embankments around Boscowen Park, and a tidal barrier that links between the two. The tidal barrier is operated to close at low tides in order for the tidal basin upstream of this to act as a fluvial storage basin for the duration of the high tide."		Ok description has been added to tidal flow section and detailed discussion.	JR	1-Sep-10
PDZ5 - Existing defences	This doesn't mention the Truro defences.	Replace "More detailed assessment of future risk may be required with appropriate future flood warning services considered and improvements made to the resilience of estuary-side community." with "More detailed assessment of future risk will be required by any scheme. As well as structural responses this, should also consider appropriate future flood warning services and improvements to the resilience of estuary-side community. Community adaptation should be supported by the Land Use Planning system and considered as part of any Community Strategy." Subject to English Heritage position. Add to "Perranarworthal and a number of listed buildings within its Conservation Area (including the Perran Foundry complex) are indicated by the mapping to be increasingly at risk during a 1:200 year tidal flood event (...). Whilst there is a current planning permission for development at Perran Foundry no works have been carried out and the SMP has assumed that this is not being progressed.	J.Payne / C.Dyke (Cornwall Planning)	Text re truro (and calerick) structures added	JR	1-Sep-10
MA11 - discussion - Restronger	There is reference of a detailed assessment (Devoran) can this be part of a MR Scheme, or elsewhere?	Replace "More detailed assessment of future risk may be required with appropriate future flood warning services considered and improvements made to the resilience of estuary-side community." with "More detailed assessment of future risk will be required by any scheme. As well as structural responses this, should also consider appropriate future flood warning services and improvements to the resilience of estuary-side community. Community adaptation should be supported by the Land Use Planning system and considered as part of any Community Strategy." Subject to English Heritage position. Add to "Perranarworthal and a number of listed buildings within its Conservation Area (including the Perran Foundry complex) are indicated by the mapping to be increasingly at risk during a 1:200 year tidal flood event (...). Whilst there is a current planning permission for development at Perran Foundry no works have been carried out and the SMP has assumed that this is not being progressed.	J.Payne / C.Dyke (Cornwall Planning)	Text amended / added for Devoran	JR	1-Sep-10
MA11 - discussion - Perranarworthal	This needs to mention the Perran Wharf WHS. The FRA for this did not show estuary capacity as an issue. The Planning Application has yet to be built out and is close to running out of time (Aug 2010). What is English Heritage's view on this site?	Use stakeholder feedback to guide choice of HTL or MR. Review justification for sustaining flood defence standard to ensure this is justified. Add direction to Land Use Planning system- "Land Use Planning should support the adaptation of Flushing against rising sea levels, including roll back of property to facilitate any future Managed Realignment. This should also be considered in any village strategy."		Text added	JR	1-Sep-10
MA11 - discussion - Mylor Quay	For Mylor Quay, a strategy is noted, but not detailed. A local strategy for Mylor Quay is unlikely, is there enough justification for an overall Fal Estuary Strategy, and if so where else in the SMP is there support for this. The risk here is that there won't be a FCRM strategy, so how else is this issue to be progressed?	Add as last sentence. "Land Use Planning, Transport Planning and any village strategy will need to support this policy through consideration of climate change adaptation. This should include improved resistance and resilience measures as well as potentially supporting roll back of property and infrastructure." Add as last sentence. "Land Use Planning, Transport Planning and any village strategy will need to support this policy through consideration of climate change adaptation. This should include improved resistance and resilience measures as well as potentially supporting roll back of property and infrastructure."	J.Payne / C.Dyke (Cornwall Planning)	Text added as last sentence	JR	1-Sep-10
MA11 - discussion - Mylor Bridge	There is reference to the need for further consideration of issues Mylor. Are these actions, and who is intended to take up these actions?	Add as last sentence. "Land Use Planning, Transport Planning and any village strategy will need to support this policy through consideration of climate change adaptation. This should include improved resistance and resilience measures as well as potentially supporting roll back of property and infrastructure."	J.Payne / C.Dyke (Cornwall Planning)	Text added	JR	1-Sep-10
MA11 - discussion - Flushing	This quotes that significant investment in flood defences has occurred, and further sustaining of defence levels is preferred. However, the minimal defences that were put in place are of limited design standard and even then were reluctantly accepted by the community. Therefore there needs to be a shift in approach here, either acceptance of defences or MR. Any MR will need strong support from the Land Use Planning System.	Use stakeholder feedback to guide choice of HTL or MR. Review justification for sustaining flood defence standard to ensure this is justified. Add direction to Land Use Planning system- "Land Use Planning should support the adaptation of Flushing against rising sea levels, including roll back of property to facilitate any future Managed Realignment. This should also be considered in any village strategy."	J.Payne / C.Dyke (Cornwall Planning)	Whole section re-written and suggested text added	JR	1-Sep-10

MA11 - discussion - Penryn	<p>The direction to sustain (and improve) flood defences needs to be reviewed. Whilst a pre-feasibility has been carried out, this has not considered MR options, nor changes to Land Use. Whilst defences were proposed, the cost benefits were unclear and may be limited to the few residential properties. The road is not, as stated, strategically important as it is no longer the main road between Falmouth and Penryn. The Agency has flagged to the Local Planning Authority the need to reconsider development along Commercial Road, and Government approach does not support regeneration on the back of providing new flood defences. We have proposed to the Planning Authority to change to watercompatible uses only (which were the original uses of these buildings), and the need to consider managed realignment (e.g. creation of a waterfront walk and open space alongside the estuary - not building defences). A PPS25 compliant and long term sustainable position needs to be presented to guide the Area Action Plan, not the defend develop option promoted here. NB this is also an area of mudflat coastal squeeze. It would be useful to give direction to the Land Use Planning system on the need to reduce the vulnerability of development types within the flood risk zones and to increase resilience of buildings as part of any redevelopment.</p>	<p>Revise policies to HTL, MR, MR. Suggested text; "A large number of waterfront properties and the local access road are at currently at risk from tidal flooding. This risk is set to increase with rising sea levels. Currently the northern end of Commercial Road is at risk of flooding from the 10 year return period flood. Historically, development here has been either watercompatible uses or uses that require a waterfront location. Land Use Planners should guide non-watercompatible uses from out of the future high risk floodplain, and ensure appropriate resilience and resistance measures. Any future redevelopments should look to mitigate for coastal squeeze of the mudflat habitats linked to the downstream Fal and Helford SAC. Transport Planners should consider options for improving the resilience of Commercial Road to flooding, which may require localised raising of ground levels over time."</p>		<p>Yes all this section updated to reflect new policies and information re LUP, suggested text has been added.</p>	JR 1-Sep-10
MA11 - Discussion - Falmouth	<p>MR is discounted due to impact on historic assets around the harbour. However, from Customs House Quay through to the Docks, the area within the floodplain is entirely modern development, including large areas of car parking. This note should be corrected.</p>	<p>Suggested text. "Any redevelopment should seek to increase resilience and or resistance to the increasing flood levels."</p>		Text added.	JR 1-Sep-10
MA11 - Discussion - Falmouth	<p>The discussion evasively talks around changes in intertidal area. The closest to a conclusion is "It is likely that a net overall reduction in intertidal area will occur toward the latter part of the SMP timeframe when considering sea level in isolation." Does this mean that this is the conclusion of the assessment of changes in MHWs and MLWS? If so provide numbers. Bearing in mind concerns about integrity of the SAC, clarity is needed as to whether the estuary system is under pressure of coastal squeeze. If the conclusion is that it is being squeezed, this supports NE calls for avoiding HTL at Truro. If there is no change but there is uncertainty due to lack of assessment, this needs to be confirmed so that the Truro strategy gets clear direction to consider this issues in more detail. The report later says "Of course working on a worst case scenario that losses will occur in at least part of the estuary the SMP needs to think about mitigation of those losses" in which case, it is needed to provide the results of the worst case scenario.</p>	<p>Redraft the general discussion to provide more clarity. Provide a clear statement, supported by numbers, of whether the intertidal area is to reduce or stay broadly similar based just on sea level rise. From this baseline, indicate if sedimentation could increase or decrease this area. Use this to discuss significance of impact on the SAC/estuary. Use this to give direction to the Truro Strategy as to whether estuary wide detailed assessment of intertidal losses is needed to be carried out in that strategy. This also needs to include a direction on the Local Development Framework as to whether this should allocate land for the roll back of the SAC and wider estuary.</p>		Yes accepted - text has been amended	JR 1-Sep-10
MA12 - Upper Fal Discussion, Page 20	<p>In addition to above notes, the HRA says that there is 11.1ha intertidal at risk of loss from present management (excluding 11.7ha mudflat in Truro Basin) but with up to 14.05ha being created by MR. Compare this with 17ha of saltmarsh at Ruan Lanihorne that could change to mudflat, and no constraints on saltmarsh creation upstream. These figures do not match the discussion quoted above which suggests likely net loss!</p>			Assumptions based on work to address the IROPI case have been discussed and included to give direction and guidance on net loss / gain based on SLR in isolation. The discussion is necessarily uncertain in regard to increasing / decreasing sedimentation as there are many variables which a re well outside of the SMPs remit to look at in details and it would be counter-productive to provide guidance without certainty. The more detailed Truro study needs to address this issue.	JR 1-Sep-10
MA12 - Upper Fal Discussion, Page 20				HRA has been changed based on the revised assessment and the work done to address the IROPI case.	JR 2-Sep-10
MA12 - Ruan Lanihorne	<p>Even though Appendix C confirms that this is the second largest area of saltmarsh in the estuary, and largest in the SAC, with 17 ha of saltmarsh, this is not mentioned at all in the discussion. This must be redressed. Furthermore, given that the historic sediment source has now ceased, this could be potentially the creation area for mudflats that would mitigate for coastal squeeze elsewhere in the estuary. Areas upstream should be considered for saltmarsh migration and direction to the land Use Planning system to secure these uses needs to be included.</p>	<p>Redraft this section to focus on the SAC intertidal habitats. The MHWs mapping should have confirmed how much of this 17ha saltmarsh is at threat of being drowned and turned to mudflat, this must be quantified even with a caveat to say sedimentation may reduce this rate of change. Confirm also the rates of increase of intertidal area upstream that potentially allow for migration of the saltmarsh. Use this to confirm if SAC is at risk of adverse impacts. If there is scope for inland migration, include a direction on the Land Use Planning system to set aside land for habitat creation (e.g. as an LDF land allocation).</p>		SAC habitat has been referenced and the issues discussed. However the SMP cannot confirm definitive details of likely sedimentation because (as the discussion at the start of the section makes clear) there are many variables, including future fluvial flows, changes in rainfall patterns etc. this puts this type of detail beyond the remit of the SMP.	JR 2-Sep-10
MA12 - Tresillian	<p>Specific guidance for roll back of commercial properties through the Land Use Planning System are required, as well as in supporting MR for habitat creation upstream of the A390.</p>	<p>Suggested text. "Land use planning decisions and policy should support managed realignment as part of community adaptation to sea level rise as well as increased resilience and resistance to flooding of remaining at risk property and infrastructure. Allocations to set land aside for the landward migration of the SAC should also be considered."</p>	J Payne / C.Dyke (Cornwall Planning)	Text added to discussion p.24	JR 2-Sep-10
MA12 Truro	<p>For Truro & Town Quay, it states 'Proposals to impound tide to make area permanently wet must be considered.' At present the impoundment area acts as a crucial fluvial flood storage area which protects central Truro, permanently wetting this would also destroy the intertidal mudflats (SAC habitat). Such a scheme would need consent from the Agency, which both NE and EA would oppose. If this proposal is to be referred to, then it should be in relation to how it can't be achieved and what negative consequences it would create.</p>	<p>Replace "Proposals to impound tide to make area permanently wet must be considered as part of the more detailed Truro Strategy" with "Whilst there may be interest in proposals to permanently impound water behind the tidal barrier, this would lead to a significant adverse impact on the Fal and Helford SAC and would significantly increase fluvial flood risks to the city centre. This proposal would not be likely to obtain necessary permissions to be delivered and is therefore not considered further."</p>	J Payne/ G Quarrier	Have changed statement to reflect this is not a viable option	JR 2-Sep-10
MA12 Truro	<p>The discussion notes MR of Garras Wharf as recognised by Forward planners, key to this is their intent to improve the connectivity of Truro with its waterfront, this is worth mentioning. The Last paragraph notes that further details should be considered in the Truro Strategy, but this should also note these should be considered further in the Truro and Three Milestone Area Action Plan.</p>	<p>Add to last paragraph on page 23: "The Local Development Framework should consider managed realignment options further as part of its aims to protect and enhance the biodiversity of the Truro River basin and to improve the waterfront and links from the water to the city."</p>		Have added statement. Have added detail relating to sea level rise impacts.	JR 2-Sep-10
MA12 Truro - Litterage Quay	<p>If HRA concerns over Litterage Quay remain, consider MR there. These issues have been raised in the past, whilst they are not popular retention of Litterage Quay should in no way be considered of Imperative Overriding Public Interest. The Agency have in the past determined feasible defence arrangements without the protection of Litterage Quay.</p>	<p>Consider MR at Litterage Quay to satisfy national NE concerns.</p>		Policy has been extensively discussed / reviewed and changed accordingly. The discussion text reflects the changes and additional considerations.	JR 2-Sep-10
MA12 Truro detailed discussion vs HRA	<p>The HRA and summary tables after the detailed discussion point to a conservative worst case loss of 11.7ha mudflats. But the detailed discussion says "some squeeze of the intertidal will occur, the current bathymetry of the estuary basin and the depth of the central channel actually dictate that any losses of intertidal are likely to be very limited"</p>	<p>HRA and summaries of HRA should be updated to reflect detailed discussion, or vice versa.</p>		Policy has changed. HRA has reassessed the location and work to address IROPI case has been undertaken and referenced in the discussions.	JR 2-Sep-10

MA12 Truro	<p>Page 22/23 - How does altering the shoreline at Boscawen Park "relieve sea level rise pressure on the current channel and tidal barrier and better manage risks" ? - please clarify.</p> <p>Page 22, end of first paragraph - The case for Boscawen Park realignment by removing a waste tip and losing playing fields is questionable. In other situations waste tips have been sufficient reason not to create habitat, due to costs and risks. Should this be suggested without knowing the likely content of the tip and costs of removal and protection to the remainder?</p> <p>Page 24 4th paragraph - Is there really any evidence that the barrier can be used to make a significant difference to the sedimentation? We must not raise expectations with casual comments if they can not be substantiated.</p>	<p>Clarify what pressure MR at Boscawen Park relieves and how. Confirm if waste removal concerns have been considered. Confirm evidence to suggest use of Tidal Barrier can provide enough sedimentation (eg compare current rates with sea level rise)</p>	G. Quarrier	<p>Have removed reference to barrier control of sediment as no study has been undertaken to prove or disprove this</p>	JR	2-Sep-10
MA12 Truro	<p>Page 24 Last para - The SMP does not set standard of protection into the future. The strategy will decide the future optimum standard of protection which will vary over time due to sea level rise and assumed periodic interventions. There is an expectation that we will work towards maintaining the indicative standard though. Needs to give understanding on influence of sea level rise on current fluvial defence scheme (this presently free flows but is on the verge of being tidally affected). It needs to be made clear who is to be actioned to do the more detailed flood study, how increased community resilience is to be delivered (is this a Land Use Planning Action?). Is the direction on flood warning to include residents on the General Tidal Flood Warning? the culverts provide flow capacity not storage.</p> <p>Whilst there is a policy unit, and the summary says this is to meet wider objectives of SAC, there is no detailed discussion provided. As such, there is no place in the document to give direction to the Land Use Planning System to preserve potential future areas of intertidal land.</p> <p>This needs to identify the assets at risk - erosion of coast road and car park vs. coastal squeeze of beach - loss of coast path (due to obstruction by Meanporth estate).</p>	<p>Replace "Under the preferred plan the barrier would form part of a continued strategy to provide and maintain a 1:200 year standard of protection into the future. Improvements along the Lighterage Quay frontage may be part of wider management of the flood risks within the upper estuary. The forthcoming Truro strategy will consider proposals in more detail." with "The preferred plan intends to support the provision of a high standard of protection to Truro from a combination of a tidal barrier and raised defences. The details of the optimum defence arrangement and the standard of protection that this provides over time will be determined by the Truro Strategy."</p>	G. Quarrier	<p>Suggested text has been added</p>	JR	2-Sep-10
MA12 Calenick	<p>Needs to give understanding on influence of sea level rise on current fluvial defence scheme (this presently free flows but is on the verge of being tidally affected). It needs to be made clear who is to be actioned to do the more detailed flood study, how increased community resilience is to be delivered (is this a Land Use Planning Action?). Is the direction on flood warning to include residents on the General Tidal Flood Warning? the culverts provide flow capacity not storage.</p> <p>Whilst there is a policy unit, and the summary says this is to meet wider objectives of SAC, there is no detailed discussion provided. As such, there is no place in the document to give direction to the Land Use Planning System to preserve potential future areas of intertidal land.</p> <p>This needs to identify the assets at risk - erosion of coast road and car park vs. coastal squeeze of beach - loss of coast path (due to obstruction by Meanporth estate).</p>	<p>Give direction to the Land Use planning system if MR requires roll back of property. Confirm if Calenick FAS will be effective in future if tide-locked, or will have reduced capacity and hence reduced standard of protection, or, should upgrading of the fluvial defence be included as part of any Managed Realignment.</p>	J. Payne / C. Dyke (Cornwall Planning)	<p>Have made reference to this but SMP remit does not really cover such detail in relation to fluvial defences.</p>	JR	2-Sep-10
MA12 undefended coast	<p>Needs to identify the assets at risk - erosion of coast road and car park vs. coastal squeeze of beach - loss of coast path (due to obstruction by Meanporth estate).</p>	<p>Include a discussion section on the undefended estuary, this should give a direction on the Local Development Framework to allocate land for set aside to allow inland migration of the SAC and wider estuary with sea level rise. Unless there is evidence that this is not required.</p>	J. Payne / C. Dyke (Cornwall Planning)	<p>Some discussion is already provided but an additional section of text has been added to cover this and provide direction to the LDF</p>	JR	2-Sep-10
MA13 - Maenporth	<p>The discussion notes that NAI meets the wider scale objectives of the Fal & Helford SAC. It also supports the AONB. This section could be improved by relating this to the unspoilt, peaceful nature of the entire estuary which should be supported by a broad NAI - the other policies become the local exceptions. The section could be improved by referring to the designated habitats of the SAC and their response to sea level rise.</p>	<p>Have identified assets at risk & discussed coast path.</p>	JR	2-Sep-10		
MA14 - undefended estuary banks	<p>Erosion and flooding impacts to the roads and slipways is not discussed - this is the location of the passenger ferry that forms the link of the SW Coastal Path across the estuary. Is there no Land Use Planning guidance on improving property resilience? It is mentioned that flood warnings need to be improved, what is the intent of the action to improve warnings (are there limitations in the existing warning service)?</p>	<p>Paragraph has been added to describe these characteristics and to refer to SAC habitats.</p>	JR	2-Sep-10		
MA14 - Helford Passage	<p>This discussion does not represent reality on the ground. There is a lot of local controversy over Gweek Quay, where a large amount of unconsented infilling occurred in the last few decades. The quay is widely seen as separate from the village (socially and landscape wise) and that this has a negative impact on the intertidal habitats (and AONB). The references to specific elements of quay need more clarity, at present it reads as if this very recent illegal infilling somehow represents a significant historic asset to the village! Where is the MR proposed (in the village)? Do these justify Policy Units given limited coastal issues similar to Port Navas which is included in the undefended estuary banks unit? At very least Gillan and Flushing should be considered together as they merge into each other.</p>	<p>Have added detail to the discussion and better identification of assets at risk.</p>	JR	2-Sep-10		
MA14 - Gweek	<p>This section needs to include a direction on the planning system to deliver adaptation of the settlement, and especially the waterfront properties, against rising sea levels.</p> <p>As raised before, and subject to some review, the landward side of Loe Bar is not static as stated but has been observed to be retreating landward at a rate exceeding 1m per year; photo plates and access chambers also demonstrate the profile to be rising to the order of 1m or more in short timescales. The evolution of the bar, in terms of crest height, is crucial to both the conservation of the Loe Bar SSSI and flood risk management at Helston. Whilst the SMP may not be able to give complete direction, it MUST accurately represent the issues here.</p>	<p>Redraft and ensure there is clarity over which policy applies where, and ensure values of 'quay' are soundly based. IF HTL is intended for the Gweek Quay infill site (subject to recent inquiry), this should be removed as site does not represent values given in discussion and retention of which Natural England has argued cannot be considered to have no impacts on the SAC due to uncertainty of contamination of fill used.</p>	J. Payne / C. Dyke (Cornwall Planning)	<p>Have split discussion for the separate policy units - have clarified re the unconsented section of Quay</p>	JR	2-Sep-10
MA14 - Flushing and Gillan	<p>This section needs to include a direction on the planning system to deliver adaptation of the settlement, and especially the waterfront properties, against rising sea levels.</p>	<p>Suggested text:- Land use planners should consider waterfront properties as at a High Risk of flooding from wave action, and should seek to ensure appropriate flood resistance and resilience measures as part of any redevelopment.</p>	J. Payne / C. Dyke (Cornwall Planning)	<p>Can adjust for final iteration if required</p>	JR	2-Sep-10
MA15 - Cadgwith	<p>As raised before, and subject to some review, the landward side of Loe Bar is not static as stated but has been observed to be retreating landward at a rate exceeding 1m per year; photo plates and access chambers also demonstrate the profile to be rising to the order of 1m or more in short timescales. The evolution of the bar, in terms of crest height, is crucial to both the conservation of the Loe Bar SSSI and flood risk management at Helston. Whilst the SMP may not be able to give complete direction, it MUST accurately represent the issues here.</p>	<p>Revises the guidance/ detailed discussion. Allowing the height of the bar to raise will increase flood risks in Helston. This is not an acceptable response for the Agency, and with the culverts in place the current arrangement can not be considered to support natural process either.</p>	J. Payne / C. Dyke (Cornwall Planning)	<p>Text has been added</p>	JR	2-Sep-10
MA17 - Loe Bar	<p>We still question the stated local importance of the roads at risk of erosion here. The road is single carriageway, and has many alternative access routes. So what is the justification of its importance? This section needs to comment on the effectiveness or otherwise of potential Sand Dune Management as a means to retarding the erosion extent shown under NAI (especially as the site is a focus of the Sand and Beach Management Strategy). If there is any potential to reduce the extent of erosion this would remove the risk to properties at the rear of Praa Green. Dune management should also receive BAP habitat support. If this is effective, change policy to MR along the whole frontage but note need for community/Parish partnership to support this. Compare with Lelant Saltings where proposed management of the dunes is given as MR.</p>	<p>Have revised the discussion as suggested. Ref to EA requirement to manage crest height & impacts on SSSI</p>	JR	2-Sep-10		
MA17 - Porthleven	<p>We still question the stated local importance of the roads at risk of erosion here. The road is single carriageway, and has many alternative access routes. So what is the justification of its importance? This section needs to comment on the effectiveness or otherwise of potential Sand Dune Management as a means to retarding the erosion extent shown under NAI (especially as the site is a focus of the Sand and Beach Management Strategy). If there is any potential to reduce the extent of erosion this would remove the risk to properties at the rear of Praa Green. Dune management should also receive BAP habitat support. If this is effective, change policy to MR along the whole frontage but note need for community/Parish partnership to support this. Compare with Lelant Saltings where proposed management of the dunes is given as MR.</p>	<p>Have revised text to reflect EA concerns and have made reference to positive benefit / cost ratio</p>	JR	2-Sep-10		
MA18 - Praa Sands	<p>There needs to be direction in this section to the roll of Land Use planning to facilitate roll back of the Sydney Cove properties and car parking (may be even Castle Drive). This is essential for delivering the plan.</p>	<p>Confirm effectiveness of dune management. If effective change policy to MR. Suggested text: Over the long term, Praa Sands will be subject to significant coastal change and Land Use Planners should consider identifying the area as a Coastal Change Management Area. This should be accompanied by policies to support any roll back of properties and community assets.</p>	J. Payne / C. Dyke (Cornwall Planning)	<p>Have re-worded section. Policies have been changed to MR</p>	JR	3-Sep-10
MA18 - Praa Sands	<p>There needs to be direction in this section to the roll of Land Use planning to facilitate roll back of the Sydney Cove properties and car parking (may be even Castle Drive). This is essential for delivering the plan.</p>	<p>Have added text</p>	JR	3-Sep-10		

MA18 - Praa Sands	To end up with HTL at Sydney Cove seems a missed opportunity. Given that the properties will need to be rolled back to facilitate MR, what is the point of only rolling them back to a location that then still needs defending? Previous consultation had this as MR followed by NAI, so why the change to a more unsustainable policy?	Return to NAI as long term policy.			Long term aim is now to return to NAI following period of MR. Text has been amended.	JR	3-Sep-10
PDZ8 - introduction	As noted before, the A30 is NOT a trunk road behind Penzance and Newlyn (this is also an issue for MA20 text). It is only Trunk road behind Longrock. Mousehole is also distinct and isolated from Penzance (not part of continuous sprawl but located in the AONB). Environment and nature conservation could be improved by noting the coastal pressures on Marazion Marsh, this would help prepare for justification of policy selection.				Text has been amended	JR	3-Sep-10
PDZ8 - introduction					Have made reference to pressures on marsh in text p.4	JR	3-Sep-10
PDZ8 - introduction	Unconstrained Scenario. As noted before, this needs to include a comment on the impact this would have on the Marazion Marsh SPA - namely that it would destroy its integrity. This is needed to support policy selection justification.				The unconstrained scenario is just setting out the basis for the physical evolution of the coast in the absence of defences. If we talk about the impact of the unconstrained scenario on the Marsh, then really we would need to do so for the rest of the frontage i.e. the impact on the whole settlement, railway line etc. This could have consistency implication. We need to make sure that the issues are covered in the discussion section. I have though added a note to this section.	JR	3-Sep-10
AA summary, page 19, 25, 32/33	The text says The majority of policy locations and HTL/MR policies amongst the units are a sufficient distance or physically unconnected to the Natura 2000 Sites that no direct loss or indirect effects are expected. However, this does not reflect direct impact on Marazion Marsh in MA19. Comment needs to be revised. Should text be the same for each MU?	Suggested text, The Habitats Regulation Assessment has not been able to discount adverse impacts of Managed Realignment on Marazion Marsh due to constraints on the relocation of the site to a more resilient inland location. Hold the Line has therefore been adopted to ensure that the plan does not introduce impacts to the site. However, as the site will remain vulnerable in its present location, Managed Realignment options should nonetheless be considered as part of any future Strategy or Local Development Framework.	J. Payne / C. Dyke (Cornwall Planning)		Have amended text in all HRA summary boxes	JR	3-Sep-10
MA19 - detailed discussion	The first and second paragraphs relate to MA20 not MA19.	Add final paragraph: In order to address these complex management issues a detailed Mounts Bay Flood and Coastal Risk Management Strategy will be required covering the bay from Marazion through to Newlyn. Furthermore, with the significant coastal change predicted, the Local Development Framework should identify Mounts Bay as a Coastal Change Management Area, and support this in the future by an Area Action Plan. In relation to Marazion Marsh both the FCRM Strategy and the Local Development Framework will need to consider in detail options to migrate the site inland and if this is proved feasible to then consider suitable Managed Realignment options. For this reason, the coastal change management area needs to extend inland far enough to include potential relocation sites for the marsh.	J. Payne / C. Dyke (Cornwall Planning)		Have inserted these paragraphs into key values and drivers as they discuss issues a bit wider than any single MA really...	JR	3-Sep-10
MA19 - detailed discussion Marazion Marsh	Include clear guidance on a Mounts Bay strategy and also give clear direction to the Land Use Planning system.				Suggested text added as final paragraph p.16/17	JR	3-Sep-10
MA20 - detailed discussion	The text says "The photos were taken during large SW swell conditions". But there is only swell in photo "Damaged mat revetment, Longrock, (during storms, Nov 2009)" and even that doesn't look that large (a couple of feet), was the photo at the height of the storm or afterwards? Clarity here may help selling how significant the wave action threat is. NB on page 26 this is referred to as October storms. Last paragraph page 22 separate the transport comment and the beach amenity comment to highlight the later. Confirm scale that HTL will reduce/remove (?) the width of beach.				Some photos were taken 13th & 14th November 2009, see graph left, as far as I can tell the largest significant wave heights recorded since the penzance buoy was deployed (up to 5m 15+ft) so was definitely a very substantial swell event. Some photos were taken on earlier occasion. Have clarified this in text. Have inserted the wave graph into PDZ doc as agree it helps to represent the very significant wave dominated risk.	JR	3-Sep-10
MA20 - detailed discussion	Sainsbury are in discussion with the Heliport about redeveloping the site. This may result in a reduced scale heliport located to the eastern end of the current site, which is less affected by erosion risks. The text needs to reflect this.	Add to end of third sentence although we understand that discussions are underway for the redevelopment and reorganisation of the site that may also support this. Add last sentence. Any redevelopment of this site should seek to remediate any contamination risks.			Paragraphs amended. Note on HTL added	JR	3-Sep-10
MA20 - detailed discussion	As noted for MA19 above, this section should highlight the need for a Mounts Bay FCRM Strategy, direction to consider a Coastal Change Management Area, and need for an Area Action Plan for Mounts Bay to address climate change adaptation in the next LDF, and also action the Local Transport plan to consider these issues. This should include direction for these further plans and strategies to cross reference each other.	Add a final paragraph: This frontage, in combination with the adjacent management areas, presents the area of greatest coastal change in Cornwall. A Flood and Coastal Risk Management Strategy will be required to provide detailed investigations for Managed Realignment options for the future. However, it is essential that this strategy is coordinated with both the Local Development Framework and the Local Transport Plan which both need to consider the long term adaptation of this area to sea level rise. The area should be identified as a Coastal Change Management Area, which should extend far enough inland to take account potential alterations to the transport infrastructure, as well as the inland migration of the Marazion Marsh. This scale of change should support development of an Area Action plan in the next round of Local Development Framework. Transport Planners need also consider the long term options for the road and rail network through the area.	J. Payne / C. Dyke (Cornwall Planning)		Have added suggested text	JR	3-Sep-10
MA20 - detailed discussion	There is no supporting text to justify the HTL along the Chyandour frontage. This is particularly needed as the summary table justification is the preservation of the road (not trunk road), of which only 150m is threatened (plus bus station and car park). The other note is protection of Gulval which is not discussed so it is not clear what this is being protected from nor how (erosion and flooding appear only to affect one field and the Tesco store).				Have added text as final paragraph. Have added text to explain the perceived importance as link to harbour frontage route into town centre etc which is why HTL is preferred, but that the MB Strategy may well need to refine the approach here to meet requirements of MR to the east, depending on the approach taken	JR	6-Sep-10



MA21 - detailed discussion	As noted for MA19 & M20 above, this section should highlight the need for a Mounts Bay FCRM Strategy, direction to consider a Coastal Change Management Area, and need for an Area Action Plan for Mounts Bay to address climate change adaptation in the next LDF. This where the detailed study for MR of the promenade that is referred to (last sentence page 32) would need to be carried out. These plans and strategies need to cross reference each other..	Add last sentence to page 29. The scale and options for any managed realignment through this section should be considered in detail by a Mounts Bay Flood and Coastal Risk Management Strategy. The Local Development Framework should include this area in a Coastal Change Management Area, and ideally address the necessary climate change adaptation through an Area Action Plan in the next LDF. It is essential that the strategy and land use plans work together to find the optimum adaptation strategy. Options for the strategy and any future redevelopment of the area should consider as appropriate options from promenade structures supported by offshore structures through to roll back of the most vulnerable development areas and re-establishment of sand dunes (an important BAP habitat) in their place.	J.Payne / C.Dyke (Cornwall Planning)	Ok, text added as suggested.	JR	6-Sep-10		
MA21 - detailed discussion + summary table	Page 31 includes reference to 'well known' flood risk around Jubilee Pool. There is no mention of flood risk in the Wherrytown area. Yet in the Oct 2004 floods, there was significant flooding from overtopping (not represented in EA Flood Map) that was considered by emergency services as a risk to life. This needs to be mentioned as it will only get worse with time and MUST be factored in to any MR scheme. This was raised in the previous feedback the EA gave! (No flood zone is shown in the Wherrytown inset map.) This should recognise the significant role of agriculture in this area. The impression given is that the area depends just on fishing and tourism. The table on page 9 contradicts the text as it says there are zero properties at flood risk over the entire PDZ! But at Larmorna Cove the existing defences notes risk from wave action.	Add middle paragraph to page 29. Whilst still water tidal flooding is mainly concentrated around Wherrytown, there are significant flood risks from wave overtopping along the entire length of the promenade. During the 2004 tidal storm, wave overtopping caused flood flows along the Western Promenade Road of over 300mm, such that the road had to be closed to access by the emergency services. This must be considered in any Flood and Coastal Risk Management strategy, as well as being considered in planning policy and decisions.		Have added additional text and explanation of the nature of the flood risk, have also added additional inset map to show the still water flood outline.	JR	6-Sep-10		
PDZ9 - Key values	The table on page 9 contradicts the text as it says there are zero properties at flood risk over the entire PDZ! But at Larmorna Cove the existing defences notes risk from wave action.	Amend tables to clarify only considering still water flooding, or amend to include numbers at risk of wave action.		Have added note to p.4	JR	6-Sep-10		
PDZ9 - existing defences + table 1	The tables claim there are no properties at flood risk, and only two properties at risk of erosion in the last epoch. This contradicts much of the text and hardly justifies any action anywhere. Erosion maps also show lifeboat station at Sennen at risk of erosion in short/medium term.	Amend tables to clarify. NB note on page 21 should be amended to highlight the fact that wave action damages are not included which reduces the benefit cost ratio.		Have added note to the economic table to highlight this issue	JR	6-Sep-10		
PDZ9 - economic assessment	These need to be in plain English. The first paragraph of MA23 quickly refers to PU23.1, just delete 'on an ongoing basis for the whole of PU 23.1'. Replace 'along the length of the frontage in MA23' with 'along this coast' or equivalent.			Note under table has been ammended	JR	6-Sep-10		
MA23 and MA24 - detailed discussion	What is the driver for more coastal monitoring along this section? The previous two paragraphs say there is minimal erosion, and very little at risk. This is where prioritisation of monitoring should be introduced.	Advice, perhaps in a summary section of Chapter 5, priority locations for monitoring		Text ammended	JR	6-Sep-10		
MA23 - detailed discussion	As raised before, the report states there are a number of cliff edge WHS assets. However, it looks like only the Crown Engine house is located right on the cliff edge. This section needs to give an indication of the distances of these assets from the cliff edge and which are predicted to be lost from erosion. Compare the level of detail given to this internationally important WHS compared to say Lamorna. Rather than general coastal monitoring of the whole area would it not be better to focus attention on the specific areas of risk? Is a detailed assessment needed to be undertaken by English Heritage?			Summary of priority areas etc has been added to chapter 5	JR	6-Sep-10		
MA23 - detailed discussion	As noted before, the text says the main harbour arm protects a number of commercial and residential properties, but not whether this is from erosion or flooding. The risk maps do not reflect any risk to commercial or residential properties. Table 1 says only 2 properties at risk from erosion, one is at Lamorna, so that only leaves the RNLI building. The text, maps and tables need to be consistent and provide clarity on what the risks are (and how determined). Perhaps it needs an explanation of the wave run up and overtopping impacts - size of wave, potential for damage, extent of impact (is this the main risk?). How are future risks from wave action considered?			Have added text to discussion on p.17 and expanded description of relative risk to WHS	JR	6-Sep-10		
MA24 - detailed discussion Sennen	There is no mention of the Agency's tidal defences at Cooperhouse Pool and the issues around this. This is a major Strategic defence. The only mention is that there is a sluicing gate structure as at Carnsew Pool. Similarly there is no mention of the causeway and St Erth defences which will be affected by any managed realignment.	Add sentence. There are a range of flood defence structures operated by the Environment Agency that protect properties from both fluvial and tidal flooding. The Cooperhouse Pool sluice works in combination with the pool to store river flows in times of high tides to prevent fluvial flooding, and with high ground levels either side of the sluice to defend properties from tidal flooding. The Causeway and embankments on either side of the Hayle River act to protect properties in and around St Erth from flooding.		Have added text to highlight that RNLI station also at risk. Risks from wave action have already been indicated and that historic records show wave overtopping is likely mechanism of flooding. Without undertaking specific wave run-up calcs (beyond scope of SMP) it might be difficult to be specific about wave heights in relation to extent of risk etc.	JR	6-Sep-10		
PDZ10 - Existing Defences	There is no mention of the Harbour structures at St Ives and their role in flood and erosion control. Although this is alluded to in the discussion.	Include reference to St Ives harbour structures.		Defence descriptions have been added on p.6	JR	6-Sep-10		
PDZ10 - Existing Defences	The last paragraph notes concerns about extraction leading to erosion of dunes. In discussions Gregg Guthry and Justin have mentioned the correlation of cessation of sediment discharge down the Red River, the location of the main erosion - towards Godrevy, and timing of this erosion. Plus what is sediment loss compared to gain down the River Hayle and Angarrack Stream/Loggans Moor Stream. This is too important an issue to be left hanging just as 'remain uncertain'.			Have added text to p.6, Existing Defences	JR	6-Sep-10		
PDZ10 - Processes	There is no mention of response of Porthmeor Beach to HTL. This needs to confirm if the SMP has assessed that this can respond to sea level rise with no increase in drawdown at the defence structure. The beach is a significant tourism and landscape asset, as well as a contribution to the defence system.			Have clarified last sentence but think there are still uncertainties and the available literature far from provides all the answers. Much sand extraction has occurred at Gwithian and natural exchange between beach and dunes has not operated there for considerable amount of time. This may well have contributed to localised lowering of the beach and erosion of upper foreshore.	JR	6-Sep-10		
MA25 - Detailed discussion				Descriptio nand further clarification on impacts of HTL added	JR	6-Sep-10		

MA25 - Detailed discussion St Ives	Flood risk around the harbour is acknowledged to affect 'very significant assets', but what the assets are, what the risks are (inundation or wave action), how these are affected by climate change, and how this is to be responded to is not discussed. Residential properties at Porthmeor beach are also highlighted as becoming at risk. This section must highlight if the Land Use Planning system needs to respond to these issues, should it continue to permit conversion of waterfront cellars to shops? should increased resilience be introduced. Is wave action an issue the SFRA should consider? The section should discuss direct flood risk management options, are any GIA funded defences likely to be achievable - this seems unlikely especially considering landscape impacts?	Identify assets at risk, and what risks. Give direction to land use planning.	J.Payne / C.Dyke (Cornwall Planning)	Have added text and edited paragraphs to address all the points raised.	JR	6-Sep-10
MA26	Has any consideration been given to moving Porth Kidney Sands policy unit into the Hayle Estuary management area to align the SMP with the WFD's River Basin Management Plan? If there are no reasons against this it should be moved for the Final Plan. Carbis Bay can then be included with MA25 which matches the Land Use Planning's consideration of St Ives and Carbis Bay in combination.	Change policy unit boundary to match WFD.		Yes this has been done	JR	6-Oct-10
MA26 - detailed discussion Carbis Bay	The section notes that there is a car park and facilities at risk under proposed NAI, a direction to the land use planning system is needed here - do they need a roll back policy, if not what will stop a private developer holding the line, or if they do is this not a problem. The Parish Council specifically mentioned the need for planning controls in relation to this location.	Add sentence at end. <u>The coastal change is not considered of sufficient scale for the Local Development Framework to identify Carbis Bay as a Coastal Change Management Area. Land use planners should nonetheless take account of these erosion and wave action risks in their decisions, policies and Strategic Flood Risk Assessment. Any Town Strategy should consider this issues as well.</u>	J.Payne / C.Dyke (Cornwall Planning)	Text added as last paragraph on p.13	JR	6-Sep-10
MA27 - detailed discussion Griggs Causeway	Page 16 - The case for MR in the first epoch is not clear. Why do we need to do anything now? Page 17 - Can the suggestion be substantiated that MR at Grigg's Causeway can reduce "pressure" ie risk, at St Erth. If this is a key reason for the policy at the causeway we need to be sure. In the summary, how can we have MR at Grigg's causeway in all 3 epochs? Potential for habitat creation is noted, but needs to be expanded on to give direction to the Strategy - BAP habitats as a minimum. Will MR impact on the current RSPB reserve? The operation of this reserve is constrained by a need to avoid flooding of the local road to the east - is this relevant to a MR scheme? Does MR need to provide compensation to the Carrack and Gladdan SSSI for coastal squeeze? It is also worth noting that this policy is a key deliverable in terms of complying with the Water Framework Directive as laid out in the River Basin Management Plan (include this in SEA summary).		G Quarrier	Policy has now changed to HTL/MR/MR-HTL. Text has been added for explanation on p.19	JR	6-Sep-10
MA27 - detailed discussion Griggs Causeway	Is there any direction for the Land Use Planning System, or Local Transport Plan?			Have added reference to BAP habitats. Noted also that MR strategy needs to take account of RSPB site and that there may be impacts. WFD comment has been added (and to SEA summary).	JR	6-Sep-10
MA27 - detailed discussion Cooperhouse Pool	Reference should be made on the impact of sea level rise and possible sluice management on the SSSI habitats. Guidance is needed on this strategic issue. There is a lack of mention of the Sand Dune Management Plan and with NAI being adopted this removes any support for the Management Activities that this more detailed study has concluded are necessary. Consider MR to facilitate these management actions.	Consider MR policy to support Dune Management.		Have added direction, p.19	JR	6-Sep-10
MA27 - detailed discussion Harvey's Towan	Reference to the Cornwall Beach and Sand Dune Management Strategy is needed. Without this the pressures on the sand dune system are not reflected and the Strategy's management actions will be unsupported. There also need to be direction to the Land Use Planning system on how to manage this SSSI coastal habitat and important tourism, amenity and landscape resource - without this the predicted roll back of the dunes will lead to overall coastal squeeze. Given that Management Activity is likely to be needed this should be a MR policy not NAI, and a Dune Management Plan should be promoted to deliver this. Note also, SMP1 had a Managed Retreat policy to support dune management roll back, and that with 60m of predicted Sand Dune loss along the entire frontage there is potentially significant Outcome Measure 4 scoring for MR. This should be reflected in the note to Economic Summary.	Change to MR. Amend 2nd para to end: <u>Whilst a noninterventional approach is preferred to accommodate the natural variability of this area and allow natural response to climate change impacts, the dunes are under pressure from existing development and infrastructure and from access through the dunes. The Cornwall Beach and Sand Dune Management Strategy concluded that some management of the dune system is required. A Managed Realignment policy is therefore proposed to support this management, and a specific Dune Management Plan should be produced to direct the delivery of this policy.</u> Suggested text after para 3 page 23. <u>With predicted losses of up to 12 ha of sand dunes this is considered an area of significant coastal change and, combined with the role the dunes play in the local economy, Land Use Planners should consider identifying the entire dune area as a Coastal Change Management Area. This should review the need for, and, as necessary, facilitate any relocation of development from within the dune system.</u>	J.Payne / C.Dyke (Cornwall Planning)	Policy has been changed to MR/MR/MR. Text has been added	JR	6-Sep-10
MA28 - detailed discussion Mexico to Gwithian Towans	There is no consideration of the balance of SSSI and heritage issues versus access to car parks and farm. Have the historic interests and SSSI areas been picked up? Considering these, realignment of the road is not likely to be a viable option as is suggested in the text. This section needs to highlight the implication of losing the car parks on the AONB and tourism. Together they form the most significant vehicle access to this stretch of coast and any replacement for these will require planning permission which will be heavily constrained by the AONB status of the area. This is a thorny issue that appears to have been given insufficient consideration - what is National Trust's guidance?	Review approach with National Trust.		Policy is now MR/MR/MR along the entire dune frontage. Suggested edits to text have been done.	JR	17-Sep-10
MA28 - detailed discussion Godrevy	The built environment says Tevaunance Cove has 'significant development adjacent to the beach'. However this only amounts to a couple of buildings and beach huts. Whereas, Perranporth has pubs, hotels, houses, shops, and car park adjacent to the beach that are not even mentioned - only later in the amenity and recreation section is the key role of Perranporth and scale of development there recognised. Portreath, which again has significant levels of housing next to the harbour, also has no mentioned. This section gives a skewed perspective on this stretch of coast that does not reflect the coastal priorities and pressures.			There are already significant parking areas at Gwithian just to the south - possibly feasible to extend here and find more parking if required and there is no AONB designation to constrain. Have added reference to this. Historic interests were identified in final paragraph. Have added text to highlight constraints to realignment of the access road. Trust contacted to gain their input and they have confirmed NAI is their preferred approach (Phil Dyke).	JR	22-Sep-10
PDZ11 - Built environment		Revise for consistency of significance, include reference to Perranporth built environment, and Portreath.		Yes, I think my local knowledge somewhat biased the original description provided here!! Have fully revised the appropriate text to recognise the greater scale of risk at Portreath and Perranporth and provide a better perspective of the built environment across the whole PDZ.	JR	22-Sep-10

	There is no discussion about the significance of the wave climate on flood risk to Perranporth. We noted how this exceeds the still water inundation risk and requires guidance from the SMP. There is a small reference to this in the Tidal Flow section (why there?) but the significance of this is not then drawn on elsewhere. The Agency is looking to the SMP to support further consideration and monitoring of the wave climate around Cornwall, this is one of the key sites to highlight this issue - ie in 2008 the 1 in 5 storm created waves that ran up and inundated beyond the 200 year extent.				This section is a summary of the physical offshore - nearshore wave climate of the PDZ - the detailed discussion of risks and impacts is (as with the other PDZs), all contained within the detailed discussion, otherwise we are duplicating too much. Have ensured that all the points raised are covered in the discussion text on pp.21-22 Not sure where the properties are that fall into the existing 1:200 still water extent but there are some in the 2025 extent in Perranporth that we don't seem to pick up. Check GIS extractions. Should be acknowledged that we have produced outlines for 2025, 2055, 2105 rather than just rely on FZ3 as with other SMPs but there is not scope to include modelling of wave run-up and overtopping analysis. Have added note below the table to highlight the limitations of the still water projections.	JR	22-Sep-10
PDZ11 - Wave climate							
PDZ11 - Economic Assessment	The tables of numbers of properties at risk of flooding for the whole PDZ are given as 1 in 2025, this doesn't reflect the number of properties even in the present still water floodplain. Let alone the more extensive risk zone that we advised needs to be considered at Perranporth (for example in 2008 X number of properties were affected by flooding), and Portreath. The SMP therefore fails to identify the significance of flooding here - see note above.	there must be a comparison between still water and actual flood risk.			Without study of role of the pier etc its difficult to be specific but the car park would no doubt be central to gaining a little more intertidal width. Use of more attenuating structures, as opposed to vertical walls could also be suggested as part of MR approach. Have edited text.	JR	22-Sep-10
MA29 Portreath	The discussion advises some MR between Battery Hill and the Pier. An indication of the potential extent of this MR needs to be suggested. If this needs support from the Land Use Planning system this needs to be made explicit - e.g. need for masterplanning or exceptions policies. At present there is still some development pressure in this area.	Clarify if this constitutes a significant coastal change as a community scale.		J.Payne / C.Dyke (Cornwall Planning)		JR	22-Sep-10
MA29 Portreath	The discussion says the harbour structure limits flooding, but according to the map (and the Economic Assessment) there are no flood risks to property here. This contradiction is further compounded as the discussion ends with an allusion to the need for a scheme or strategy at Portreath. Wave action is the significant factor, see note above on wave climate. This needs to be discussed.				Action Plan identifies the requirement to better understand the role the pier plays in limiting flood risk - and this refers to wave driven flood risk, not still water flooding. Have reflected this in the discussion text pp.14-15. The need for a scheme relates to possible managed realignment which is supported by EA suggested FCRM action in the Action Plan.	JR	22-Sep-10
MA29 Porthtowan MA29 HRA	If the NAI needs support from the Land Use planning System (as appears necessary by the number of properties at risk) this must be made explicit - is this an area of significant coastal change to which a Coastal Change Management Area should be defined? If as stated in teh summary that dune management important then the policy should be MR? Is relocation of buildings required to retain the Dune System, if so (or likely) this should be made explicit? This refers to sites in MA30 not MA29 The note explaining the low b/c ratio refers to a breakwater. It is the first mention of a breakwater in this PDZ, where is it - is this the Portreath Harbour? As noted about wave climate, there are large flood risks associated with wave action that are not represented here and which therefore underplays the benefits. This must be commented on.	Change policy to MR to allow for Dune Management. Clarify if this is an area of significant coastal change - based on community assets at risk it should be.		J.Payne / C.Dyke (Cornwall Planning)	Yes policies have been changed to MR/MR/MR. Explanation made in text. Potential for area to be CCA explained but not certain it would actually be. Preferred plan may mitigate main impacts. Some losses likely though. Ammended	JR JR	22-Sep-10 22-Sep-10
MA29 Economic Summary	Discussion states there is no options for realignment [it says it would achieve no purpose], but then shows significant wave action against back of beach properties. MR needs to be considered at least from a risk to life basis - which is recognised in the section above on Wave Climate. This should be supported by a direction on the land use planning system to roll back non-water compatible uses from out of wave impact zone (which only applies to the beach huts, RNLI station and slipways). Arguments for cafes in high risk zones runs counter to Government planning Policy. Confirm if this is a flood risk	Add direction: The land use planning system should consider the development area at the back of the beach to be at a high risk of flooding from wave action.		J.Payne / C.Dyke (Cornwall Planning)	Yes have ammended the note on p.19 to explain that overall B/C ratio is misleading for this PDZ.	JR	22-Sep-10
MA30 Trevaunance Cove	The Agency is concerned with the significant local wave run up, wind set up and diffraction issues at Perranporth that results in frequent tidal inundation up to and beyond the present Flood Zones 3 and 2 which are based on still water levels. This issue was highlighted at the Issues and Options stage and must be considered. This concern is exacerbated as the Agency's purely fluvial flood alleviation scheme is affected by this tidal flood risk. Furthermore, there is continued development pressure at the car park and surrounding this in tidal flood risk areas for which the land Use Planning system needs to be given clear direction on. March 2008 flooding exceeded 200 year still water levels by 0.5-0.6m, with five properties protected from flooding.	This section needs to be re-written to reflect the actual wave action driven flood risks. Direction should be given on the land use planning system to consider this in its SFRA. Should this be considered as a Significant Coastal Change Area?			Ok have added suggested text and have also ammended discussion to clarify position on risk to development, potential for roll back etc. I do believe that suitable reference to the wave driven flood risk had been made e.g. "the flood risk which is overwhelmingly driven by wave height, period and direction" etc should not leave the reader in much doubt about the main mechanism of flood risk, However have further reinforced this message within the text. Have provided guidance re development pressures and yes, identified as a potential coastal change area.	JR	22-Sep-10
MA30 Perranporth							
PDZ 12 Environment and nature conservation PDZ12 - recreation and amenity	There is no mention of Fistral sand dunes - SSSI and UK BAP, Gannel estuary saltmarshes - BAP, Crantock sand dunes - BAP. No mention of the golf course which constrains Fistral dune system, nor the back of beach amenity facilities in Newquay Bay. Flood risk issues to the main road at Treverper Bridge are not mentioned, will there be a need to realign this in the future? If it does need realignment should this make provision to allow the saltmarsh (BAP) retreat inland?	As a minimum reference Fistral Dunes and their condition.			Have made significant alteration to Perran Beach and Penhale discussions, have identified findings of the Sand Dune and Beach Management Strategy etc. Holywell Bay is now dealt with as part of Penhale policy unit (30.5) Have made reference to dunes and BAP habitat (but no indication of a SSSI at Fistral?)	JR JR	23-Sep-10 23-Sep-10
MA31 - Gannel					Have ammended text and added details	JR	23-Sep-10

MA31 - Pentire and S Fistral	The discussion says that allowing the natural response of the beach and dunes is essential. The unconstrained scenario says that the Golf course has made the dunes almost fixed and immobile. The detailed discussion suggests some encroachment to dunes into the golf course should be allowed. Clarity is required here in order for the SMP to provide guidance, should land use planning consider this, or should dialogue be with the Golf Course owners (have they been consulted)? Given scale of works proposed by Dune Management Plan, MR may be more appropriate.	Change policy to MR. Give clarity on route forward for the Golf Course.			This text already in? "Any developing flood risk to property along Trenance Lane and Trevemper Road (adjacent to the boating lake) and at Trevemper Bridge, should be managed through flood resilience and adaptation" etc. Historic incidences of flooding are very low so not sure that flood risk alone dictates MR, though saltmarsh roll back may need consideration - unconstrained left bank may allow this to occur naturally though. Perhaps this is allocation to monitor but remain as NAI at least until next review.	JR	23-Sep-10
MA31 - North Fistral	Clear direction on the need for Land Use Planning to deliver roll back of the development here in the future is required, not just to facilitate the future roll back, but also to ensure that the complex is not intensified. With S and N Fistral together, should this be considered a significant coastal change area?	Give clarity on significance of coastal change and role of land use planning. Suggested text: The combination of the scale of predicted erosion of the dune system, the amenity and economic importance of the Golf Course and Fistral Beach facilities, suggest that this is an area of significant coastal change. As such, the Land Use Planning system should identify a Coastal Change Management Area, which should then support policies for the adaptation of the area to sea level rise and the conservation of the SSSI dune system. Any Newquay Town Strategy should also considered these conflicting interests.	J.Payne / C.Dyke (Cornwall Planning)		Policy has been changed to MR/MR/MR for central Fistral & Dunes as agreed. Text has been added to qualify the reasoning. Reference made to the Dune Management Plan. Ref to discussion with golf course owners.	JR	23-Sep-10
MA32 - Towan Beach	Guidance is to break the defend develop cycle. Whereas, the discussion appears to be suggest that redevelopment pressure at the Blue Reef is sufficient justification for HTL. This position is not in line with Government Policy. The SMP needs to be confirming to the Land Use Planning System whether this is a suitable place for redevelopment and possible intensification. Given that the Blue Reef building suffered structural damage in 2008 by wave action, and that this is liable to increase in the future, the SMP should consider risk to life, PPS25 and emerging Coastal Planning Guidance for suitability of land uses at this location. As with Carlyon Bay, the management intent should be to remove any possible future burden to the public purse on protecting this site - which for Carlyon Bay resulted in the conclusion that NAI should be the preferred policy. Consistency with Government guidance and with other locations in the plan is required.	Suggested text to include: Land use planners should consider the site of the Blue Reef Aquarium to be at a high risk of flooding from wave action.	J.Payne / C.Dyke (Cornwall Planning)		Have added suggested text as summary recommendation for entire width of Fistral Bay frontage. Yes movement toward NAI is suggested as preferred. Policy is now HTL(HTL/NAI)/NAI. Have made ref to high flood risk at Aquarium site	JR	23-Sep-10
MA32 - Tolcarne & Lusty Glaze	The discussion accepts long term need for roll back of development, there needs to be a direction on the land use planning system to support delivery of this. Should this area be considered at a high risk of flooding from wave action?	Could do with direction to land use planning on the suitability to the Caravan Park location given increasing sea level rise and flood risk. Why not consider MR of the road, as only resilience and adaptation are mentioned?			Yes agreed direction needed - added. Historic incidence of flood risk is low, but in future? Prob high.	JR	23-Sep-10
MA32 - Porth	The reasoning appears flawed. Erosion lines show erosion back to cliff line, which agrees with the 35-40m erosion. But the dune is less than 40m wide. This combined with HTL for the road will lead to the loss of the dunes (BAP). At present waves already break through the dunes (even with gabions in place) and entirely flood out the area behind the road (in 2008 all properties behind the road, including those shown outside of the flood zone, were flooded - videos are available). This area is subject to development pressure, being resisted on flood risk grounds. We would suggest that MR is proposed in the short to medium term, with the road re-routed inland, and the dunes used as a natural defences. Land use planning should be given direction to relocated development from the future dune area and only to have development types suitable to high risk flood plains.	We suggest MR in the short to medium term, with re-routing of the road and preservation of the dunes. This would be supported by outcome measures, and land use planning policies (or master planning). If MR is adopted, suggested supporting text would be: The coastal changes will be significant to this community, requiring re-routing of the main through road, and possible relocation of the commercial hub of the community. As such Land Use Planners should consider identifying this as a Coastal Change Management Area.	J.Payne/ S Jeffery		Have indicated that Transport plans will ensure transport needs of community are met (this possibly through realignment of the road). Direction provided on caravan site.	JR	23-Sep-10
MA33 - Mawgan Porth	This section needs to reference sand dunes and the need to enhance these. The Beach and Sand Dune Strategy identified the dunes as in recession. AONB raised MR opportunities to reduce impact of car park on landscape and dune system.	Suggested text after note on RNLI. Managed Realignment offers the opportunity to restore the sand dunes, which are currently in recession and have been significantly damaged in the past by the construction of the car park. Relocation of the car park, and restoration of the dune system would not only provide improved coast protection but would also support enhancement of the AONB. This policy will require support from the land use planning system, potentially through master planning work.	J. Payne/ C. Holden (AONB)		Policy has been changed to MR/MR/MR to recognise UK BAP potential and not preclude potential funding	JR	29-Sep-10
MA34 - Harlyn	Need to include direction to Land Use Planning system for roll back of car parking.	Suggested text. Any Village Strategy should make provision for the timely relocation of the car park from out of the erosion risk zones.	J.Payne / C.Dyke (Cornwall Planning)		Text has been amended, additional suggested text added.	JR	29-Sep-10
MA34 - Harlyn and Trevone	If flood defence standard unlikely to be sustained into future with sea level rise, there needs to be a direction for the land use planning system to consider climate change adaptation.	Add to final paragraph. Land use planning has an important role in managing these increasing flood risks which should be included in the Strategic Flood Risk Assessment. This, and any Town Strategy, should help community adaptation through increasing resilience and ensuring appropriate land uses in future high risk zones.	J.Payne / C.Dyke (Cornwall Planning)		Text added as last paragraph on p.13	JR	29-Sep-10
MA35 Padstow	The justification for a new HTL (previously NAI) policy is to "to allow access arrangements to the estuary to be transferred". There are no erosion risk by 2105. What does this justification refer to, does it justify HTL? Why is Padstow South considered but not Little Petherick where there appears to be more property at risk of flooding?	Replace second sentence of last full paragraph on page 16 with: Since the standard of protection from the defences can not be guaranteed into the future, and given the impacts of deep and sudden inundation in the event of overtopping of the defences, development of resistance and resilience to flooding of property and infrastructure behind the defences is needed. This should be addressed by the Local Development Framework, and the Town Strategy, and supported by appropriate emergency planning.	J.Payne / C.Dyke (Cornwall Planning)		Padstow South (Dinas) has proposed policy of NAI/NAI/NAI (changed prior to public consultation period) and text has been amended to reflect this.	JR	4-Oct-10
MA35 Padstow South	Note. CFMP action is to "Review standard of protection and condition of defences at Palmoria and Wadebridge. Undertake work to reduce risk, if justified." As this does not guarantee upgrades of defences, the text needs to give explicit direction to the land use planning system, and this should not be delayed for beyond 20 years. Even with upgrades, there remain residual risks of sudden inundation with risk to life, this should be noted.						
MA35 Wadebridge							

MA35 Egloshayle Right Bank	The text here is unhelpfully ambiguous. It is stated that the policy is Hold The Line, but there is no indication of what that line is. There are two sets of parallel defences, so which does HTL apply to? There are old earth embankments to protect agricultural land alongside the channels - the Agency is progressively setting these back or making them permeable. Landward of these old defences, as part of the Sladesbridge scheme, new defences were provided along the main road and in front of the properties at flood risk at Clapper. In between the two defence lines are scrapes and ponds, and we are in the process of increasing the frequency and amount of flooding to these to provide habitat improvements and support UK BAP. So is the policy in support of UK BAP or in conflict with it? Defences are quoted as having a residual life of less than 20 years. This scheme was only constructed in 2004 and the Agency considers it has a design life of in excess of 20 years. Direction for land use planning is required.			Suggested text has been added	JR	4-Oct-10
MA35 Sladesbridge				Have identified that HTL should apply top the new defensive line established by the 200 defence scheme.	JR	4-Oct-10
MA35 Chapel Amble	The text claims that the barrier provides a 200 year standard of protection. It is only a 10 year standard ! This needs to be changed along with any repercussions on policy choice and guidance. Why should the long term position effect short term improvements being carried out to improve the condition of the SSSI? This has limited cost, is supported by outcome measures, and allows the more gradual transition in land of freshwater habitats before intertidal habitats are created.			Have ammended text accordingly on p.19 to reflect residual life and intent for localised HTL in longer term based on current defensive line.	JR	4-Oct-10
MA35 Chapel Amble		Remove concern about short term SSSI improvements.		Have changed to ref 1:10 yr sop.	JR	4-Oct-10
MA35 Rock	The Dunes SSSI are listed, but there is no comment on the coastal process impacts on the site, nor the linkages with this and the hard defences adjacent at Rock where longer term MFR is proposed - is there a relationship? This needs a clear direction on the land use planning system to support roll back of the community (and not least its car parking). Given vulnerability of caravan sites for risk to life (>1m of still water flood depth + wave action and frequent fluvial flooding) this should be included in the necessary roll back - unless there is evidence that the risks are not this significant or that it is impossible to relocate? References to Bude and Widemouth should be deleted as these are in adjacent PDZ. As fed back on the Coastal Process report, wind set up has been observed as a significant factor in water level at times, notably at Bude on 10 January 1962, when a 7ft of surge was attributed entirely to wind action. There appears to be no consideration given to this but is needed given direction of plan for Agency to take up coastal flood risk management at Bude.			Have removed comment.	JR	4-Oct-10
MA36 Polzeath PDZ15 - unconstrained		Remove reference to the caravan park remaining operational in-situ unless you can demonstrate this is safe. Include suggested text: With the predicted coastal change affecting the commercial centre of the village, the principal tourist car parks, and potentially the camp site, the Land Use Planning sytem should consider identifying a Coastal Change Management Area for Polzeath.	J.Payne / C.Dyke (Cornwall Planning)	Have added suitable text on p.22 Text has been adites ammended as suggested.	JR	4-Oct-10
PDZ16 - Wave climate/ tidal flow				Reference has been removed. Yes this was overlooked in original round of edits. Any wind set up can certainly be significant but of course wind-waves!! Any wind strong enough to generate a 7ft surge at the open coast will be accompanied by very significant wave heights even if they are locally generated and of short fetch so it will always be a wind/wave combination on open coast locations. If the surge mentioned was entirely within the river Neet then this may be more attributable to a funneling action in the river mouth but this is not clear. Have ammended text to reflect.	JR	20-Sep-10
MA39 - Widemouth	Argument for single linear dune system is supported by UK BAP. Add reference.			Have added text: In addition this would have significant environmental benefits and would be likely to improve the habitat value and biodiversity of the coastal strip. In particular, creation of dune habitat would contribute to UK BAP habitat targets for coastal sand dunes. Funding to assist with this management approach would be made more likely through demonstrating that specific Government outcome measures relating to BAP habitats could be achieved.	JR	21-Sep-10
MA39/40 Widemouth - Bude	As noted before, there is a contradiction in the text that needs amending for undefended cliffs between Widemouth and Bude. Widemouth discussion says cliffs up to Bude Haven are very prone to erosion with 40m lost in last 100 years. But the Bude discussion says the same section is unlikely to erode more than 5-10m in next 100 years.			Have clarified that high erosion zone only extends as far as Lower Longbeak and tha t beyond the headland recession rates are in line with those at Bude pp.13-14.	JR	21-Sep-10
MA40 Bude	It would be beneficial to comment on the increasing flood risk and salinity in the floodplain upstream of Bude, what potential for BAP habitat creation is there - e.g. coastal floodplain grazing? AONB highlighted concerns of the impact of car parking at Duckpool and Sandymouth. If erosion is expected at Sandymouth, then direction to resolve these car parking concerns needs to be included as an action, possibly on the National Trust.			Have added text to highlight risks / opportunities pp.21-22	JR	21-Sep-10
MA40 undefended cliffs north of Bude		Suggest adding third paragraph to PDZ Management Intent; based on detailed discussion reviews, e.g. Whilst shoreline management policies can attempt to manage overtopping and erosion risks to freshwater supply areas, they can not control other issues such as exceedance events, percolation through banks or saline intrusion though bedrock. These potential issues need to be considered in more detail as part of an overall strategy into freshwater supply for the entire archipelago. Support with action to Council.		Text added to highlight this issue p.20. Action added to Chapter 6. p.77	JR	21-Sep-10
PDZ 18 Key values and drivers PDZ 18 Recreation and	Potable water is mentioned here, and it is a key issue to the isles' sustainability. It could do with more comment in Unconstrained Scenario This section describes the economy, not recreation and amenity.			Text added on p.6	JR	9-Sep-10
PDZ18 Wave Action	To support coastal monitoring needs, this section should comment on the lack of wave data and give direction on future monitoring needs - e.g. how many wave buoys and where. Does St Mary's need a wave buoy to north (main quay direction), south (Portcressa) and south east (Port Hellick)? The other islands? How vital is this to the understanding future risks and resolving uncertainty? General feeling is this may be more important than cliff erosion monitoring.		J.Payne/ D. Senior (IoS Climate Change Coordinator)	Ammended - text moved to key values, new text added for recreation	JR	9-Sep-10

MA45 Stinking Porth + Great Popplestones	Following storms a few years back, mass stone was placed at the rear of the beach at Stinking Porth to protect Great Pool. There is no mention of this or the increasing wave overtopping threat to Great Pool from either bay. What are relative levels around Great Pool to sea level in the future? See SMP1 for details of flooding in 1989 which should be reflected in SMP2.	Have ammended to provide better description - think there is enough room for some natural burffer to be enhanced but monitoring is quite key at this location - particularly on the impacts on the northerly shoreline defences Have clarified description and highlighted the high erosion potential	JR	9-Sep-10
MA45	>60m of erosion is described as a stable coastline!		JR	9-Sep-10

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General Comments:		Reviewer:		Organisation:	

Chapter 5 should include a summary of the main issues from the plan and generic issues across the plan.
 A very significant issue is to detail the wave action implications, as highlighted in the SEA Annex II, Page 12 and Coastal Processes Report section 2.4. This deserves a section to discuss.
 The ability to enhance current UK BAP Sand Dune habitats should be stressed, with the potential for the area to deliver national targets included.
 Policies given in the summary tables don't match the policies given in chapter 4. For example see Praa Sands. These will all need going for the final plan.
 Policies shown in the display maps don't match the policies given in Chapter 4, see Garras Wharf.

Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date
	Chapter 5 is said in Chapter 1 to "Brings together the overall plan, highlighting important issues in relation to the future management of the coast." However, all it includes is the summary plans and tables. This Chapter should give a high level summary of the plan, and highlight any plan wide issues - especially wave action (see comment below).	Add a summary, with key issues highlighted. For example, Mount's Bay is the most significant area of change which needs to be reviewed by a further study and supported by the Land Use Planning system. Isles of Scilly will be significantly challenged by rising sea levels; this is from a coast protection perspective, but also water resource and community resilience.	J. Payne	06-May-10	A series of sections of text have been produced in response to the key points made. These now form the basis for a more robust summary introduction to Section 5.	JR	9-Aug-10
	Flood risks from wave action, wave run-up etc given enough weight in the main SMP, though the Coastal Processes Report states "consideration and understanding of waves and the energy they deliver to the coast, is essential in undertaking an effective review of the SMP". For exposed locations, esp. on the north coast, tidal inundation is not a significant threat, but wave action is. Eg at St Ives & Newquay waves threaten structures & pose a direct risk to life. Only up estuaries, eg Hayle & Wadebridge, is still water inundation a direct issue. Lack of acknowledgement leads to: Flood risk Summary for Lands End Peninsula shows 0 properties at risk, but the discussion highlights flood risks by wave action to properties at Lamorna and both commercial and residential properties at Sennen; Perranporth shows EA still water floodmap and ignores the 2004 storm (25 yr rfn prd) that exceeds this; risk to life at Trevaunance Cove & Newquay Bay are not referred to; wave action flooding at Wherrytown is not referenced but affects any MR strategy; there is no support for further wave bouys off the north coast. There needs to be a clear direction of where coastal monitoring should be focused, what priorities, what form of information. For instance, MA23 monitoring of undefended cliffs is low priority, whereas, beach monitoring (especially post storm) is essential at Dowderry. Cliffs at Crown Engine WHS may be important, dune recession at Praa Sands ...	A section should be included using the text from Coastal Processes Report section 2.4 or SEA Annex II. However, this also needs to draw on the risks highlighted in chapter 4, and to quantify the scale of the risks. Furthermore, this should include direction to the land use planning system. e.g. Wave Action is a material planning consideration and that development within Xm of the coastline should include a Flood Risk Assessment that determines the risk of wave action and overtopping; also, that the SFRA2 and any FRAs in Perranporth (plus other locations?) should review the wave action, wind set up, wave run up threats. This section would then support generic actions to monitor and study wave action threats along the coastline. This section must include recommendation for additional wave bouys and tide gauges (inc for IoS)?	J. Payne	06-May-10	Agree very important - A section of text plus a summary table has been produced to provide more guidance on this topic. Text added to Appendix H (economics) to highlight that damages caused by wave action are not included in the assessment within the SMP as it is based on flood extents generated from still water tide levels, and that further assessment work would be needed as part of the Action Plan implementation.	JR, JD	9-Aug-10
	The significance of UK BAP habitats and Local Authority targets for their retention, enhancement and reinstatement are needed. States Par Docks statement justifies a CCMA on the ground of significant changes to land use being prosocoed. This is not in line with PPS25 criteria for a CCMA.	Add a section summarising the range of coastal monitoring required, indicate priority monitoring locations and type of monitoring required (plus why). This can then be linked to an actio for future coastal monitoring. A summary of the impacts on UK BAP habitats should be included, i.e. can Cornwall Council deliver its targets on maritime and intertidal BAP habitats? Notably there are opportunities for sand dune creation and enhancement that should be referenced. These add Outcome Meaure scores for possible funding, and also may identify if there is scope for Cornwall to provide national target of 1000ha to be reinstated by 2019. Include a section in Chapter 5 to review this.	J. Payne	06-May-10	Ok text added explaining current situation and discussing improvements, including wave buoy network Have made reference to importance of sand dunes as BAP habitat. Can further ref be taken from SEA?	JR	9-Aug-10
Page 12		delete this reference.			Deleted	JR	9-Aug-10

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Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date
Appendix B	There is no reference to St Just in Roseland submission or consultation				Engagement event was listed but with no date. Date now added and their submission acknowledged.	J Dunstan	11-Aug-10
Appendix D	There is scant consideration of UK BAP habitats, notably Coastal Sand Dunes, which are not referred to for instance at Pentewan and Praa Sands. This under sells the Natural Environment features and also misses funding opportunities through UK BAP Outcome Measures.	Review and revise Appendix D to reflect UK BAP habitats.	J Payne	05-May-10	UK BAP Habitats covered in individual PDZs in Chapter 4	J Dunstan	11-Aug-10
Appendix A					Wording in section A7 and A8 updated to reflect the stage we are now at.	J Dunstan	4-Aug-10
Appendix G					Update of Appendix G to reflect changes to policy	J Dunstan	6-Aug-10
Appendix G					Cross check of policy to pick up any errors	J Dunstan	6-Aug-10

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General Comments:	Reviewer:	Organisation:
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The SEA does not reflect the benefits to Natura 2000, UK BAP or other important habitats. For example benefit of retaining Marazion Marsh SPA is given as neutral but is one of the most significant benefits of the Plan to the natural environment! Whereas letting the site be lost under NAI is given as a positive. The positive of MR at Hayle is also not given any credit in the scores to support the WFD yet this is the only Heavily Modified Waterbody measure that the Plan delivers. None of the UK BAP Dune management or creation is given any appropriate credit. This needs to be amended

Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date
Page 4	Delivers a moderate balance with mainly minor positive or minor negative impacts. What about in retention and enhancement of UK BAP Sand Dune Habitats (major positive), protection of Marazion Marsh (major positive), allowing Fal and Helford SAC to evolve with sea level rise (major positive), WFD measures of MR at Hayle (major/ moderate positive)?	Revise SEA to reflect UK BAP habitat etc importance	J Payne	05-May-10	Review of assessment following policy changes has provided additional significance of the benefits arising from the SMP. Noted in the SoEP.	P Thornton	16-Jul-10
3.2.2	The River Fowey is not mentioned as a significant south coast estuary whereas the smaller Helford Estuary is included (as is the Ganel on the North Coast).	Check significance and include as necessary (or exclude lesser relevant estuaries that are included)	J Payne	05-May-10	Refers to width of the estuary rather than length of the estuary. However, relevant significance of the estuary has been considered in the assessment.	P Thornton	16-Jul-10
Table 4.1	Benefits of policy are not appropriately scored. For example, PU9.3 Caerhays, NAI and MR will provide protection or enhancement of UK BAP Coastal Sand Dune habitats and as such Objectives G and K should score a Major positive, instead these are given as neutral. Similarly, PU19.6 Marazion Marsh, HTL will maintain the SPA, yet objective G is given as Neutral for HTL when it should be Major Positive. Ironically NAI of Marazion Marsh, which we know would result in the destruction of the Natura 200 site is given a positive score on maintaining natural habitats!	Revise SEA to reflect the importance of UK BAP habitat, Natura 200, SSSI sites, WFD objectives etc	J Payne	05-May-10	Following policy changes, the review of impacts and significance have identified more significant beneficial impacts of the SMP, and these are reported in the SoEP.	P Thornton	16-Jul-10
4.2	Major benefits are not reflected in the text or summaries for each PDZ. For example, UK BAP Coastal Sand Dune creation/enhancement provided by MR at Pentewan Sands is not noted in 4.2.8 despite providing Major Benefits. PDZ 5 is given as minor positive or minor negative, despite protecting the Fal and Helford SAC from impacts of climate change which should give a Major Benefit score. Prevention of the loss of Marazion Marsh SPA is given minor positive minor negative, yet is very definitely delivering a MAJOR Benefit by saving the SPA	Revise SEA to reflect the importance of UK BAP habitat, Natura 200, SSSI sites, WFD objectives etc	J Payne	05-May-10	Following policy changes, the review of impacts and significance have identified more significant beneficial impacts of the SMP, and these are reported in the SoEP.	P Thornton	16-Jul-10
5.2.1	This states "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, however the SMP has the potential to affect minor changes in the condition of these sites along with SSSIs through changes in habitat and coastal management". Yet the Plan has identified that Marazion Marsh SPA is fundamentally at risk of sea level rise and the SMP policy has been selected purely to prevent this.	The SEA needs to be reviewed and corrected. It is clearly wrong about the impacts on internationally and nationally importance habitats.	J Payne	05-May-10	Following policy changes, the review of impacts and significance have identified more significant beneficial impacts of the SMP, whilst impacts on Natura 2000 sites have been avoided, and these are reported in the SoEP and the updated HRA.	P Thornton	16-Jul-10
Annex 1	The tables do not consistently include the Draft Plan policies, e.g. Page 14 Marazion Marsh SSSI and RSPB reserve are given as HTL, MR, MR; whereas Page 16 Marazion Marsh SPA correctly has HTL, HTL, HTL.	The SEA needs to be reviewed and updated for Draft Plan .	J Payne	05-May-10	Consistency of policy details have been reviewed following policy changes. Consistent policy identification is presented in the SoEP.	P Thornton	16-Jul-10

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Adverse impacts are concluded by the HRA on the Fal Helford SAC, yet HTL and MR are still promoted. Lack of evidence is noted, yet assessment of extents of Saltmarsh and mudflats were highlighted as an issue for this review to consider - hence the inclusion of the estuaries; upstream locations are not considered at Tresillian and Ruan Lanhome for example.

No alternatives have been considered in the HRA, so this is not a complete assessment. Obvious alternatives would be not having HTL where it results in reduction in designated feature habitats.

No overriding reasons of public interest are considered, this may well have shown that HTL at e.g. Penryn does not have overriding public interest issues.

Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date
Fig C5.1	Tresillian map does not consider saltmarsh upstream of SAC boundary only those alongside the boundary. This is not adequate. Mudflats are not shown at all.		J Payne	05-May-10	The issues and policies to these sites have been re-examined based on review of topo data and discussion with Natural England and the Environment Agency. Mudflats have been shown on the figure, and are included where relevant in the revised assessment.	P Thornton	16-Jul-10
Fal SAC - Mudflats and sandflats	It is noted that the loss of mudflats is not known, e.g. at Tresillian. Why not?		J Payne	05-May-10	The overall measurement of mudflat loss across the whole estuary is not known, however, the assessment of policy where HTL in particular occurs and whether that would result in restriction to intertidal habitat movement/development/constraint is examined and assessed.	P Thornton	16-Jul-10
Fal SAC - Mudflats and sandflats	HTL at Penryn is promoted and is concluded not to have an effect on mudflats. This tidal creek is presently mudflats and so HTL WILL result in coastal squeeze on the mudflats. The Agency would also question the justification for HTL to provide NEW Flood defences, especially as this is an area of waterside uses which should either be retained as such with no need for flood defences or for roll back of these properties and MR to provide mudflat habitat. The priorities here are wrong, local commercial interests requiring national flood defence funding are being put above international biodiversity interests, this must be wrong.		J Payne	05-May-10	Policy has been revised to take account of potential issues associated with coastal squeeze on the SAC downstream of the areas.	P Thornton	16-Jul-10
Fal SAC - Mudflats and sandflats	What is the relevance of this to Swanpool, it is a saline lake on the coast.		J Payne	05-May-10	The name Swanpool is of the frontage (PU 13.3) rather than in respect of the lake. The assessment is describing the effects of policy at Swanpool.	P Thornton	16-Jul-10
Table 5.1	What is the point of this table here? It doesn't give any information on HRA issues, and is repeated elsewhere.		J Payne	05-May-10	This table was included so that as a semi-standalone document, the HRA identified what policies it was assessing against. These have been revised following consultation and relevant changes, and where policy change occurs in or near to European Sites assessment has been undertaken or reviewed.	P Thornton	16-Jul-10
5.3.12- 14	This is the first discussion in the report (page 69) directed at marazion marsh, it is in a section concluding no effects but the SPA is not mentioned in the text. Where is the discussion?		J Payne	05-May-10	Marazion Marsh and frontage assessment is described in paragraphs 5.4.8 onwards (para 5.3.31 in the revised version). However, the sites highlighted in the box if not mentioned are not affected.	P Thornton	16-Jul-10
5.4.2 - 5.4.7	HTL is concluded as causing an adverse impact. These policies therefore should be changed. NO consideration for preserving mitigation sites upstream is discussed. This is inadequate consideration of the SAC issues in the policy development.		J Payne	05-May-10	The conclusions of the HRA have been changed subject to alterations to policies, intents, and re-examination of effects following additional data, and discussions with Natural England and the Environment Agency.	P Thornton	16-Jul-10
6.1 where to from here?	Revise the plan with alternative policies that do not have adverse impacts on Fal and Helford and Marazion Marsh.		J Payne	05-May-10	Policy revision and examination of additional data in consultation with Natural England have been undertaken resulting in some revisions to the assessment, which are presented in the revised version, and have avoided resulting in an adverse effect arising. Consequently, alternative policies do not need to be examined.	P Thornton	16-Jul-10
5.4.8	This includes reference to largest community on the western tip of UK Mainland. This is meaningless, it could equally refer to Plymouth or to Sennen depending on whether you fixate on the largest community or the western tip.		J Payne	05-May-10	Altered to "one of", however, it is indicative of the central role to the surrounding communities that this area provides.	P Thornton	16-Jul-10
5.4.10	It is unacceptable to say that at this strategic level it is impossible to assess the effects on Marazion marsh. Strategic does not mean crude, it means focus on the priority issues.		J Payne	05-May-10	Policy has been changed and subsequently affects re-assessed resulting in finding of no adverse affect, in discussion and agreement with Natural England and the Environment Agency.	P Thornton	16-Jul-10
5.4.10	If NAI and MR have the assumed impact, why not adopt HTL and protect the site? This is the other clear policy alternative and it does not appear to have been considered.		J Payne	05-May-10	Policy has been changed and subsequently affects re-assessed resulting in finding of no adverse affect, in discussion and agreement with Natural England and the Environment Agency.	P Thornton	16-Jul-10
Padding	There is a lot of padding in the document, e.g. the Glossary includes a number of terms not used in the document, HMA, LDF, DPD, RSS, LP etc. includes glossary and list of abbreviations, loads of blank pages. This all hides the headline issue of the conclusion that the plan can't be legally adopted.		J Payne	05-May-10	Several lines of glossary have been deleted where appropriate, which has not changed the size of the document. Intentional blank pages have been put into the report to ensure that lead Section pages are on the front right of a printed document when reading for ease of searching, readability, and clarity. If printed double sided this only increases the number of pages printed in total by 2 sheets. In relation to the headline issue, it is not accepted that if there is an adverse effect arising out of the SMP policies the plan cannot be legally adopted. If an adverse effect occurs, the test of Alternative Options then IROPI would need to be undertaken to ascertain whether the reasons for the impact on site integrity are of national interest. In that event, the SMP would then have to identify and commit to appropriate compensatory habitat creation (i.e. through the RHCP).	P Thornton	16-Jul-10
HRA of 5.3.15 to 5.3.18	I am greatly concerned that the HRA makes bold predictions of potential losses of mudflat and saltmarsh without quantifying the trends of sedimentation. One of the reasons for doing an FRM Strategy is because increased siltation has reduced available storage! We really need to know the quantity of mudflat that was there in the original Natura 2000 citation, or when the Habs Regs started (1994). If the increase has been substantial, then future losses due to SLR may be insignificant or trivial (a term from the Act). The figures quoted for losses are very much worst case scenarios - I know they are caveated as such but it raises expectations! EA policy is to consider the range of potential loss and invest accordingly. We will not be investing on a worst case scenario until its reasonably well proven. To start with we might follow a more middle course. We must make the point that investment in realignment will be limited until trends can clearly be established that the mudflats are disappearing.		G Quarrier	05-May-10	This is outside the requirement of the HRA. The HRA is required to assess the affects of the SMP policies, not to provide detailed sedimentation and flood risk assessment. In line with the precautionary principle as required in HRA and the need to identify what is the possible effect based on best information, the areas provide a conservative quantification of change at this strategic level (and appropriate to this strategic level). Further detailed Strategy or Scheme Level investigations will confirm (reduce or increase) what extent of loss through erosion, accretion, and coastal squeeze.	P Thornton	16-Jul-10
MA12 Truro detailed discussion vs HRA	The HRA and summary tables after the detailed discussion point to a conservative worst case loss of 11.7ha mudflats. But the detailed discussion says "some squeeze of the intertidal will occur, the current bathymetry of the estuary basin and the depth of the central channel actually dictate that any losses of intertidal are likely to be very limited"	HRA and summaries of HRA should be updated to reflect detailed discussion, or vice versa.	J Payne	05-May-10	Policy changes have resulted in the removal of habitat lost to Natura 2000 sites as a result of SMP, following re-assessment and discussion with Natural England and the Environment Agency.	P Thornton	16-Jul-10