

SMP Title		SMP No 17 - Rame Head to Hartland Point and the Isles of Scilly				Lead Contact:	Martin Clemo		Reviewers	1. Jim Hutchison Environment Agency		2. Steve Jenkinson Environment Agency		3. Liz Galloway Environment Agency		
Flood & Coastal Risk Manager	Gordon Trapmore	Approval Required by Regional Director	Richard Cresswell		Lead Authority:	Cornwall County Council		4. Nikki Hiorns / Thomas Schindl Natural England		5. Graeme Smith - Nil Return Teignbridge District Council		6. Andy Parsons Halcrow		7. Karen Thomas Environment Agency		
Website	http://ciscag.org/	Region:	South West			8. Karl Fuller Environment Agency		Section Amended (New paragraphs and Table nos used in this column)		Action Required	Comment provided by:	Date comment provided				
Item Number	Showstopper	Date Matter raised	Criteria Heading	Criteria sub heading	Document Reference	Comment	Action Required	Timing of Comment	Comment provided by:	Date Response Provided	Response	Review of Response	Action Required	Comment provided by:	Date comment provided	
1		23-Apr-10	Technical	Boundaries	Main Report Chapter 4	When considering the PDZs at the boundaries of SMP numbers 16 and 18, it is unclear if the choice considers the adjacent units from those neighbouring plans.	Can the team please explain and add further text as required?	Review of Draft	Jim Hutchison	16-Aug-10	7c03 Hartland Point to Clovelly policy is NAI / NAI / NAI. 18.5 Cawsand to Rame Head is NAI / NAI / NAI. These both fit with our policies at the start of PDZ1 and end of PDZ17 respectively. Have added text to the relevant PDZ sections to clarify this (PDZ1 on page 12 & PDZ17 on page 11) .	Satisfied		Jim Hutchison	08-Sep-10	
2		23-Apr-10	Technical	Boundaries	Main Report Section 3.4 and Figure 3.2; Ch 5; Appendix C Estuaries Report	<p>There is inclusion of estuaries in some PDZs. Some of the estuarine boundaries are further upstream than when SMP1 was prepared. It is unclear if the estuarine boundaries are in line with the SMP Volume 2 Guidance Note, or if the locations have been chosen for other reasons, e.g. to marry up with the boundaries of other high level plans, e.g. Catchment Flood Management Plans? Do (or should) CFMPs cover all of these estuaries, and what does the SMP2 state about a better or more natural boundary for any updates? [JH]</p> <p>The Estuaries Report notes the existence of relevant CFMPs, and that it is important to be aware of policy decisions made as part of the CFMP to avoid conflicts. This is a useful flag but it is not clear</p> <p>a) the status of the CFMPs</p> <p>b) how the CFMP policy decisions are drawn into the decision making process for SMP Policy Units.</p> <p>Also, it would be helpful to see the CFMP locations and boundaries on a map. [SJ]</p>	<p>Can the team please clarify and add additional text as required? Also where future boundaries might best be located in these estuaries? [JH]</p> <p>Could the Project Team please:</p> <ul style="list-style-type: none"> <li>- add some text to explain the status of CFMPs (eg. whether approved), how any gaps or overlaps are dealt with, the compatibility of policy options and whether there are any issues to resolve that will need to be included in the Action Plan?</li> <li>- add a map to show the location of the CFMPs in relation to the SMP? [SJ]</li> </ul>	Review of Draft	Jim Hutchison Steve Jenkinson	16-Aug-10	<p>Text added to Chapter 3 as follows "Catchment Flood Management Plans (CFMPs) are in place for the whole of the SMP2 area (excluding the Isles of Scilly) and consider fluvial, pluvial and still water tidal flood risk now and in the future in order to set policies for managing the risk on a catchment basis. The CFMPs that cover the SMP2 study area are West Cornwall CFMP, East Cornwall CFMP, Tamar CFMP and North Devon CFMP, the boundaries of which are shown on Figure 3.3 below. The CFMPs were adopted by the Environment Agency in 2008.</p> <p>MAP inserted</p> <p>The CFMP policy unit boundaries and the Appendix F Estuaries Assessment (Appendix C) have been considered to some extent in determining the PDZ boundaries in relation to the upstream extent on estuaries.</p> <p>The Estuaries Assessment is presented in Appendix C. This was undertaken for the Fal, Fowey and Camel estuary to determine the upstream extent of the estuary for SMP2 consideration in accordance with the Defra Appendix F assessment guidelines,</p> <p>The approach to determining the upstream extent of the PDZs has been driven however by the Client Steering Group who requested that each estuary was considered to its normal tidal limit, including the Fowey, Fal and Camel estuaries. This was in order to ensure the SMP2 was able to provide guidance on pressures and management of the Special Areas of Conservation (SAC) present on the Fal and upper reaches of the Camel estuary. Extending the boundary on the Fowey was in order that the SMP2 could consider flood risk at communities in the upper estuary.</p> <p>This is beyond the upper boundary determined by the Appendix F assessment and SMP1 coverage in some locations. This means that there are now no areas within the study area which are not covered either by SMP2 or CFMP policy to ensure no gaps exist.</p> <p>Within the study area there is an overlap with SMP2 and CFMP coverage at key communities, because tidal flood risks have been given some consideration within the CFMP. As such there could be conflicts in the intent of management and preferred plan between the two documents. Within the SMP2, while CFMP policy is acknowledged and considered, the general approach has been to use the analysis and assessment undertaken in the SMP2 to inform the Preferred Plan. This is because the CFMPs primary consideration was fluvial and pluvial flood risk, with only a limited consideration of the impacts of tidal flooding at certain locations. It was not within the scope of the CFMPs to cover the range of estuary and coastal assessments required of the SMP2.</p> <p>Chapter 5 presents a comparison between the SMP2 Preferred Plan and the CFMP policy where a specific action to implement the CFMP Policy option is published in the CFMPs for Tamar Catchment, East and West Cornwall and North Devon. "</p>	3.4.1	The additional text and map in Ch.3 are very helpful (although as a minor comment the location of the new text does not seem ideal - better in Sect. 3.47). I also see that the Action Plan includes actions (Table 6.2) specifically related to CFMPs. Satisfied. [SJ]	Satisfied (JH)	Jim Hutchison Steve Jenkinson	08-Sep-10
3		23-Apr-10	Technical	Coastal Processes	Appendix C Coastal Processes	Whilst a significant proportion of the cliffs are resistant and subject to low erosion rates, there are areas where the current erosion risk is described variously as slips, rock fall, debris sliding, erosion of head deposits etc. However, it's not clear if the risk is erosion as defined by the Coast Protection Act (CPA), or whether other external factors such as groundwater are the cause.	<p>Can the Project Team define, in simple terms, which areas of cliffs are impacted by erosion and where the primary drivers are other mechanisms, and where known, what these are?</p> <p>Following on from this, it will be helpful for data to be provided setting out landowners where non CPA mechanisms are active, and what funding sources might be appropriate where actions are required.</p>	Review of Draft	Steve Jenkinson	16-Aug-10	<p>Ok. Have added the following explanation to Appendix C. The great majority of cliff recession around Cornwall and the Isles of Scilly occurs due to a combination of direct coastal erosion from wave impacts and general weathering of the cliff face due to the maritime climate. Slips, falls, debris slides etc are generally mechanisms of failure dictated by the geological make-up of the cliff and position of faulting, with coastal erosion and weathering driving this process. Coastal processes also drive the removal of material from the base of cliffs and subsequent re-distribution on the foreshore. There are no specific known areas where groundwater or surface water run-off is the main driver of erosion.</p> <p>These factors are however thought to be contributory factors at locations such as Downderry, Gunwalloe, Praa Sands and particularly Godrevy where softer head deposits are found. We do not have a full database of landowners to cover all of the cliff areas at risk but there are examples such as private home-owners at Downderry, Breage Parish Council at Praa Sands and the National Trust at Gunwalloe and Godrevy. Where applicable these have been referenced in the Action Plan for the appropriate location. It is unlikely that the National trust, under their Shifting Shores policy will however be looking to fund any engineered works along their frontages.</p>	Appendix C, pp 11 / 12 plus reference to landowners/funding in Action Plan	Satisfied	Steve Jenkinson	08-Sep-10	

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4		23-Apr-10	Technical	Coastal Processes	Appendix C, NAI/WPM Assessment	<p>There is no information or indication on the rate of cliff recession potential and how this changes between epochs. Statements such as 'cliff retreat will increase' are very vague and give no indication of the changing nature (or otherwise) of the erosion risk over time.</p> <p>This is important information in these baseline assessments and should be included here to provide the evidence linkages to the erosion information in the PDZ reports in Section 4 of the main document, particularly as there are no maps showing erosion risk under NAI scenario to support this assessment.</p>	Add recession data to the NAI/WPM assessments to demonstrate erosion risk and how this changes over time.	Review of Draft	Andy Parsons	16-Aug-10	<p>We can see the reasoning behind the suggestion, but believe that, on balance, the suggested change would not improve the document.</p> <p>We have two reasons for this, (1) the recession data is already in the SMP, in several complimentary forms and (2) to make the tables more explicit would seem to require a substantial expansion of supporting information.</p> <p>Information on recession distance is already included in the SMP three forms: (1) as explicit distances in the PDZ documents, (2) as maps within the document for all key locations, and (3) freely available electronic interactive maps for the whole SMP area (which include a measurement tool). We do not feel that including the data in a fourth form, explicit distances within the Appendix C tables, would be particularly beneficial. The suggestion is that these are needed to provide an 'evidence link to the pdz' documents. We feel that this is a key purpose of the mapping.</p> <p>Statements such as 'cliff retreat will increase' are not necessarily vague, they are statements of what can reasonably be expected. More precise statements could be made such as 'cliff retreat will increase by between 10 and 30 %', but these would require a substantial amount of additional supporting information. Each unit in the table is composed of around five different subunits, each of which was the subject of a separate assessment of recession. Consequently much data is there to be added, but would require substantial expansion of the tables presented to make it clear exactly which part of each management unit every assessment is referring to.</p>	No change	Comments noted. Sounds reasonable and at this stage do not wish to extend process. Satisfied.	Andy Parsons	08-Sep-10	
5		23-Apr-10	Technical	Coastal Processes	Main Report Ch.4; Appendix H	<p>Sect H.3 notes that numbers of properties at risk have been determined by assessing the maximum flood and erosion extents under No Active Intervention, and that sea level rise has been considered in the production of these extents and therefore is taken into account in the damage assessment. Baseline erosion rates are tabulated in each PDZ in Ch.4, but I cannot find any discussion on the methodology adopted for assessing flood risk extents.</p>	Could the Project Team clarify where in the SMP the approach to assessing flood extents is presented, including clarification as to whether EA's indicative flood plain mapping was used?	Review of Draft	Steve Jenkinson	16-Aug-10	<p>3.1.3 Future flooding and shoreline change Two key technical elements of the SMP process are projections of future shoreline position (essentially coastal erosion) and flood boundaries. It is proscribed that these be assessed in three epochs representing, nominally, 2025, 2055 and 2105. Two possible approaches to coastal management must also be accounted for, termed 'No Active Intervention' (NAI) and 'With Present Management' (WPM). These represent situations under which managers do not seek to further influence the natural course of events (NAI) or decide to maintain the current standard of defence (WPM).</p> <p>The descriptions below relate to the coast within the SMP area and also to those estuaries that were deemed to have relatively low dynamics. The more responsive estuaries, the Fal, Camel and Fowey, were studied by ABPmer, as described in Appendix C.</p> <p>Future flood outlines Future flood outlines were required to inform assessment of future flood risk and habitat change. The flood risk assessment was based on estimation of the extent of future floods at the 1:200 year level, whilst habitats assessment utilised mapping of two tidal stages, mean low water spring (MLWS) and mean high water spring (MHWS), and also the 1:1 year extreme water level.</p> <p>These data were provided for primary locations throughout the region by Postford Haskoning (2003). Other locations were obtained through simple linear interpolation, based on coastline distance between the primary locations. It was not necessary to map flooding under the WPM scenario, due to its underlying assumption that current flood defence standards would be maintained, i.e. that protection would be provided against 1:200 year floods.</p> <p>Before estimating future flood and erosion hazards it was first necessary to predict sea level rise. Defra (2006) describes how this should be done, and their method provides the following results: - 2025 - 0.06 m - 2055 - 0.30 m - 2105 - 0.93 m</p> <p>Flood outlines were obtained at each of the three epochs using the following procedure: - water levels obtained from Postford Haskoning (2003) were increased by the expected sea level rise associated with each epoch, - resulting levels were projected onto the coastal boundary of a three-dimensional model of the land surface, which was provided by the EA, and created through LIDAR surveys, - the resulting contour lines were captured as digital GIS files for subsequent mapping, - these maps were later used to determine where assets would become vulnerable to future flooding, and how intertidal habitats areas might develop.</p> <p>Future coastline change The process of projecting the future position of the coast and the less responsive estuaries (the Looe, Helford River, Hayle and Gannel) began by mapping a current shore reference line. This line was defined so that it tracked the geomorphic feature of most relevance to the management of that location. For example, the cliff top was chosen if one was present, along beaches and within estuaries the MHWS line was normally tracked, whilst defences were usually followed where they existed.</p> <p>Different types of coast behave differently, and so the reference line was divided wherever the geology or geomorphology changed, or at the end of a coastal structure. This provided 835 individual coastal segments. The shore reference line was also used to generate transects along the coast, to allow subsequent mapping of the predicted changes. These were placed every 25 metres, resulting in a total of more than 28000 transects.</p>	3.1.3	Satisfied	Steve Jenkinson	08-Sep-10	

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											<p>Each of the coastal segments was then examined to identify its type, e.g. beach, dune, cliff, rocky shore and whether it was artificially defended. Certain characteristics of each segment were then recorded, and these depended on its type. Historic recession rates were estimated for all the segments using a number of sources. The level of certainty behind this key information was quite variable, and so these estimates were expressed as uncertain bands, between upper and lower limits.</p> <p>If a structure was present then coastal 'catch up' was also estimated, based on its size, age and setting. This represents recession that would rapidly follow structure failure as the shore profile adapts towards a more natural equilibrium form. Such estimation is naturally uncertain, and this uncertainty was represented by estimating upper and lower limits of the catch-up distance.</p> <p>Simple models were then applied to each segment to account for the acceleration of historic recession due to sea level rise. The simplest model dealt with rocky shores not subject to wave activity. Here shore recession was treated as a simple function of shore slope and the increase in sea level. The sensitivity of beach shores depended on the slope and availability of sediment, which determined the roll-back response to the sea level rise. A simple function was drawn from Walkden and Dickson (2008) to emulate the response of cliff/ platform shores to elevated sea levels.</p> <p>Under the WPM scenario, structures were assumed to be maintained throughout the SMP period. However the NAI scenario required estimation of structure residual life. Data on residual life was drawn from the NFCDD and reviewed. These data were discretized to fit the three epoch approach, i.e. failure was assumed to happen at the end/ start of an epoch, rather than during it. This meant that most of the structures were deemed to have failed at the end of epoch 1 (i.e. in the year 2025), since it would have been unsafe to assume that, without maintenance, they would have been sound until 2055. Once the strong bias towards failure at the end of epoch 1 was established, this was applied to all the remaining structures, except substantial harbour structures.</p> <p>The results of this process were around 5000 estimates of future recession under each of the two management scenarios. These included upper and lower estimates for each of the three epochs, for each coastal segment. The most important of these results, those that revealed a significant hazard, can be found in both the maps and tables of Potential Baseline Erosion Rates in Chapter 4. In addition the entire set of results can be viewed in the interactive software that accompanies this SMP.</p>					
6		23-Apr-10	Technical	Data and Mapping	Main Report Ch.3 p3 first para.	This section notes that coastal monitoring has recently started. I have not seen any further references to coastal monitoring, particularly the Regional Monitoring.	Could the Project Team clarify where the use of regional monitoring programme data in the development of the SMP is referenced? Also, what actions will be included within the Action Plan to ensure that links with the programme will be maintained and developed so that data will be used to inform updates to the SMP, for example?	Review of Draft	Steve Jenkinson	16-Aug-10	Text amended to state "Coastal monitoring within the study area at specific locations as and when required has been ongoing for some time. More recently a Regional South West Coastal Monitoring programme has been established to undertake coastal monitoring on a more consistent and wide-ranging basis. Over time this will build up a valuable picture of change along the coast, however at this stage the data is too limited to draw trends and conclusions from to inform this SMP. Coastal monitoring data for the SMP2 area and all of England is freely available from the Channel Coastal Observatory website at www.channelcoast.org". Therefore Regional Coastal Monitoring data has not been used to inform the SMP and therefore no reference required. Draft action plan has now been completed for NQRG review and this states monitoring requirement actions where appropriate.	chapter 3	Satisfied		Steve Jenkinson	08-Sep-10
7		23-Apr-10	Technical	Data Issues	General	It is important that as much as possible of the high level data that has been collected and used to inform the development of the plan is presented clearly, for example in summary tables. This is partly to provide an audit trail and partly to inform high level reporting eg. national summaries. This will include key data and assumptions covering areas such as policy unit data (lengths, co-ordinate data, policy by epoch), process assumptions and economic data.	Could the Project Team consider the addition of data summary tables where these are not already provided, including the provision of any high level data collected but not presented in the plan? This is not a request for additional data collection, but simply ensuring that best use can be made of existing data.	Review of Draft	Steve Jenkinson	16-Aug-10	We accept the need to present and source as much of the data that have been used within the SMP2 - We have now added the bibliographic database in Appendix K (which was not included in the draft smp). Appendix A (section A4.3) lists the data used within the SMP and refers the reader to the bibliographic database provided in Appendix K.	Appendix K	Text in Appendix K appears to be comprehensive and provide an effective audit trail for the source data. Satisfied.		Steve Jenkinson	08-Sep-10
8	Showstopper	23-Apr-10	Technical	Data Issues	Main Report Chapter 4; Appendix C Defences Assessment; Appendix C Estuaries Report	<p>When discussing the various PDZs in Chapter 4 it is unclear where the condition of flood and coastal assets are discussed, or cross referenced? Has NFCDD been used, and if so which date base? If not, how has the residual life of these defences been established? [JH]</p> <p>App. C discusses existing defences but I have only seen limited reference to NFCDD data (App.H). Also, the Estuaries Report notes that defence data was not available at the time of report preparation, so the defence assessment could not be undertaken. [SJ]</p> <p>There is no indication on where the information contained in the defence assessment has come from. Also, this is more of a description of defences not an assessment, as there is no information on the condition or residual life of the defences. This information should be in this appendix as it forms a key part of the assessment of NAI. [AP]</p>	<p>Can the team please clarify and add text or cross referencing as appropriate? [JH]</p> <p>Could the Project Team clarify what defences data is provided in this SMP, and where? Was NFCDD used to assess risks and inform policy option selection, and if so which version/date? Has the defence assessment missing from the Estuaries Report been undertaken? [SJ]</p> <p>Add in where defence information has come from (NFCDD? Site visits? Etc). Also, add in detail on defence condition and residual life. [AP]</p>	Review of Draft	Jim Hutchison Steve Jenkinson Andy Parsons	16-Aug-10	<p>NFCDD data were supplied by the EA for the entire coastline. The spreadsheet supplied was an updated version for May 2009 and included asset condition inspection entries for survey carried out up to March 2009. These spreadsheet data were used as a basis for creation of the 'Defences Shapefile' which is included as a deliverable with the GIS Viewer. (Therefore the attribute table which sits behind the GIS shapefile provides a tabulised data set listing the defences). A checking exercise was then undertaken against the position of known assets. NFCDD was generally well populated for Cornwall and the Isles of Scilly but there were some structures not listed and in some cases residual life values are missing.</p> <p>Therefore using a combination of local knowledge, site visits and remote inspection using aerial photography enhancements have been made to the originally submitted NFCDD data set to add any missing structures and estimate residual life values. These enhancements are therefore brought into the SMP Review via the GIS Viewer and the defences shapefile but also through the baseline scenario mapping exercise, where this improved dataset provided the basis for the spatial defence location and residual life. Site visits have also provided added value in the form of photographic records which have been used within Appendix C and within the Chapter 4 PDZ documents to assist with descriptions of defences where it was felt useful. The NFCDD defence information for the estuaries was provided for an update of the ABP baseline scenario mapping which was undertaken for the lower estuary areas following preparation of the reports.</p>	Appendix C, Defences Assessment, pp1.	Satisfied		Jim Hutchison Steve Jenkinson Andy Parsons	08-Sep-10

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9		23-Apr-10	Technical	Data Issues	Main Report Section 3.1; Appendix C; Appendix H	<p>Within the context of uncertainty I would have thought mention or a cross reference to climate change would be appropriate in Ch.3. Also, I assume that the Defra October 2006 data was used in the context of this plan, and I assume that this is referenced and perhaps further cross referencing is required? [JH]</p> <p>I am unable to find a full discussion on assumptions and data sources relating to climate change either in the Main Report or Appendix C. There is brief reference in Appendix H. The inclusion of this is important as it provides the framework for future erosion and flood risk. [SJ]</p>	<p>Can the team please consider? [JH]</p> <p>Could the team clarify where climate change assumptions are set out, or if not included add some additional explanation. I suggest this should be in Appendix C with some cross reference in Ch.3. [SJ]</p>	Review of Draft	Jim Hutchison Steve Jenkinson	16-Aug-10	<p>Words added to Chapter 3, 3.1.1 as follows " Sea level rise is a key component of our assessments of change at the coast, about which there is uncertainty, however the use of government adopted allowances allow for consistency in approach across all SMP2s. Sea level rise is the general term for the upward trend in mean sea level resulting from a combination of local or regional geological movements and global climate change. Within the SMP2 we have used the recommended contingency allowances for net sea level rise as adopted for use by the government in 2006 (FCDPAG3 Economic Appraisal Supplementary Note to Operating Authorities – Climate change impacts, October 2006). This approach results in the following contingency allowances for sea level rise for the three SMP2 epochs; 0.06m to the year 2025; 0.34m to 2055; and 1.0m to the year 2105."</p>	31.1.	Satisfied		Jim Hutchison Steve Jenkinson	08-Sep-10
10		23-Apr-10	Technical	Decision Making	Main Report	<p>The document explains the aim of developing policy for individual units within the PDZ framework to ensure that the implications of managing one policy unit on another are considered. This is an important facet of policy option selection, but I am not clear where these considerations are explained in the PDZ or PU summaries ie. I might expect to see some comments in the PDZ/PU summaries which explain how the policy option for one unit has been influenced by those relating to adjacent units?</p>	<p>Could the Project Team provide some clarity on how the approach works and any examples of this?</p>	Review of Draft	Steve Jenkinson	16-Aug-10	<p>Along the majority of the frontage there is no direct linkage between policy units. This is due to the nature of the coastline i.e. long stretches of open cliff intersected by prominent headlands and with small coves present which have developed mainly at the mouths of small river valleys. This leads to a generally disconnected coastline with little in the way of longshore littoral transport. Many policy choices therefore are made independently of adjacent units and are much more dependent on the characteristics of the discrete area itself. However there are PUs &amp; MAs where there are more direct links, e.g. at Marazion-Penzance and St Ives Bay. In these areas we have tried to indicate how policy choice is linked between neighbouring PUs. At Downderry we have adjacent PU's covering a developed frontage but with minimal alongshore links and justifications for policy choice based on links to neighbouring Seaton are provided.</p>	No change	Satisfied		Steve Jenkinson	08-Sep-10
11		23-Apr-10	Technical	Linkages	General	<p>The SMP should explain both the spatial relationship and policy/planning links with other high level plans where relevant, such as coastal strategies (including non FCRM).</p>	<p>Could the Project Team clarify where in the SMP these relationships are set out? This should include a commentary on plan status and interface with the SMP, and preferably mapping simply to understand the spatial links.</p>	Review of Draft	Steve Jenkinson	16-Aug-10	<p>Words added "3.4 Links to other plans 3.4.1 The spatial planning system The Government's national policy for managing development on coastal areas affected by coastal change is set out in Planning Policy Statement 25 Supplement; Development and Coastal Change (March 2010). The aim is that coastal communities should continue to prosper and adapt to coastal change. This means that planning should: - ensure that policies and decisions in coastal areas are based on an understanding of coastal change over time - prevent new development from being put at risk from coastal change - ensure that the risk to development which is, exceptionally, necessary in coastal change areas because it requires a coastal location and provides substantial economic and social benefits to communities, is managed over its planned lifetime, and - ensure that plans are in place to secure the long term sustainability of coastal areas.</p> <p>In order to achieve the above it is essential that planners are informed about the current shoreline and future physical changes to it through erosion, coastal landslip, permanent inundation and coastal accretion. The SMP is therefore a key source of evidence base that planners should consult when determining the material planning considerations set out above (Policy DCC1 from PPS25 Supplement).</p> <p>The SMP2 assists planners by identifying Coastal Change Management Areas (CCMAs). These are areas likely to be affected by physical changes at the coast, for which the planning authority should set out the type of development appropriate for that location, the circumstances in which certain types of development may be permissible and allocations for land for appropriate development (Adapted from PPS25 Supplement March 2010)</p> <p>Throughout the development of the Cornwall and Isles of Scilly SMP2, the Client Steering Group has consulted with the Forward Planning team at Cornwall Council about CCMAs within the study area and the SMP2 Preferred Plan for these locations. This work has fed directly into the Core Strategy Issues and Options documents prepared for the Local Development Framework.</p> <p>3.4.2 Coastal Strategies The SMP provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks in a sustainable manner. In doing so, a SMP is a high-level document that forms an important part of the Defra strategy for flood and coastal defence which provides both a broad scale assessment of these risks but also quite specific advice to operating authorities in their management of defences.</p> <p>Following the adoption of the SMP, the Action Plan should therefore be used by the operating authorities to direct investment at the coast. Often this requires further study at a Management Area or Policy Unit level to determine the next steps in implementing the intent of management. Strategy studies, as set out in the Flood and Coastal Defence Project Appraisal Guidance (FCDPAG) are undertaken to identify and evaluate options for the best approach to implement the intent of management to make the best use of public money and achieve transparent, balanced and good decision making taking account of a wide range of factors. This is the next layer of decision making following the SMP, and because of the more detailed level of study undertaken can find that the SMP policy options are not technically, environmentally, or economically feasible and suggest alternatives. Strategies should then be used in turn to inform future SMP revisions.</p>	3.4	Satisfied		Steve Jenkinson	08-Sep-10
12		23-Apr-10	Technical	Tools	Appendix C, Defence Assessment	<p>The defences appear to have been identified, but the assessment is unclear. Has any prioritisation been carried out? [JH]</p> <p>The report is descriptive of the various defences around the coast but does not state any information about condition or standard of protection. [KT]</p>	<p>Can the team clarify what assessments have been done, including any prioritisation? [JH]</p> <p>Can the team clarify whether this is picked up in the economics report – if not please consider adding more information here? [KT]</p>	Review of Draft	Jim Hutchison Karen Thomas	16-Aug-10	<p>Additional words and a new table added to this appendix. New table sets out condition etc details of defences.</p>	App C Defences assessment	Satisfied		Jim Hutchison Karen Thomas	08-Sep-10
13		23-Apr-10	Technical	Tools	Main Report Ch.5	<p>I note that several of the PU statements include management of risk through the use of flood warning systems and support to community resilience.</p>	<p>Could the Project Team confirm that relevant actions are included in the Action Plan to ensure that these management activities secure an appropriate level of consideration?</p>	Review of Draft	Steve Jenkinson	16-Aug-10	<p>Yes - the Action Plan has now been produced and there are frequent references to the requirement for such improvements to the flood warning service and reference to support for community adaptation and resilience linked into the land use planning system.</p>		Satisfied		Steve Jenkinson	08-Sep-10

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14		23-Apr-10	Social	Decision Making	Main Report Ch.1 Introduction Ch.5, various units	<p>It would assist the reader if the changes from SMP1 to SMP2 were known and it appears that Para 1.3.1 could usefully have a cross reference to the location in the plan where this information is set out.</p> <p>Where there is a change in proposed policy option between SMP1 and this plan, I assume the reasons are clear and the stakeholders and public are aware and that there should be no surprises. [JH]</p> <p>There does not appear to be a succinct comparison of SMP1 and currently proposed policy options, which would be a very useful point of reference for stakeholders. [SJ]</p>	<p>Please add cross reference in Ch.1 and highlight where implications are discussed in the plan.</p> <p>Can the team please confirm that they have made the reasons clear in this section where the SMP2 proposes a change from that set out in SMP1? [JH]</p> <p>Could the Project Team please consider the inclusion of a straightforward summary table which compares SMP1 and SMP2 policy options, and includes a brief note on the reason for the change? [SJ]</p>	Review of Draft	Jim Hutchison Steve Jenkinson	16-Aug-10	<p>1.3.1 Wording amended - Very much initiated by the findings of the SMP1, a considerable effort has been put in place over the last three years to ensure that we have been in a better position to make judgements with respect to the coast. - removed reference to last 3 years. 1.3.1 Extra words added "The review undertaken by this SMP2 has resulted in some changes to the SMP1 policy options for a number of policy units. Chapter 5 provides a summary and overview of the SMP2 preferred plan and policy option choices. This provides a direct comparison of SMP1 and SMP2 policy so that where the policy option has changed, this can be clearly recognised. The discussion around policy development, including any changes from SMP1 to SMP2 is provided within the discussion and detailed policy development in Chapter 4.". The Summary table in Chapter 5 provides the comparison between SMP1 and SMP2, with the discussions in Chapter 4 providing reasoning for the SMP2 policy.</p>	1.3.1, 1.3.1	Satisfied		Jim Hutchison Steve Jenkinson	08-Sep-10
15.1	Showstopper	23-Apr-10	Social	Engagement	Appendix B	<p>It is important that all the comments that are received during the consultation of this plan are clearly documented with a suitable response so that all can see how their issues have been dealt with by the CSG. [JH]</p> <p>There are two tables of stakeholder responses included in this appendix, but no record of how these have been addressed. [SJ]</p>	<p>Can the team please confirm that Appendix B is suitably populated with clear responses on all issues raised during the consultation exercise? [JH]</p> <p>Could the Project Team confirm that the final SMP will contain a full record of comments and how these have been dealt with, including any changes made to the SMP (particularly policy options) as a result? [SJ]</p>	Review of Draft	Jim Hutchison Steve Jenkinson	16-Aug-10	<p>HUK has prepared a communications plan which sits within the Appendix B document. This sets out all the comments received during the consultation stage from all sources. Upon finalisation this is where spreadsheets will be added as an annex to provide an audit trail of the consultation comments and the responses and actions (this will include the NQRG spreadsheet). Section B3 does state where stakeholder responses received in earlier engagement where incorporated into the developing SMP.</p>	Appendix B section B4	QRG Review continues on next line in column G			
15.2						<p>Response and Sect. B4 noted, that's good. [SJ]</p> <p>Satisfied. I assume this QRG Review sheet will be added to Appendix B. (JH)</p>	<p>With reference to Item 16 below, can the CSG please clarify whether CSG responses to stakeholder comments will be presented on the website or App. B or both? (SJ)</p>	Review of Resubmission	Steve Jenkinson	26-Oct-10	<p>The table detailing CSG responses to stakeholder comments will be included within Appendix B, it will also be made available on the website once finalised.</p>	Appendix B. Website.	Satisfied		Jim Hutchison Steve Jenkinson	05-Nov-10
16		23-Apr-10	Social	Engagement	Appendix B	<p>Several comments on this appendix:</p> <p>a) Neither the web page nor the report appendix appear to have a formal stakeholder list but this may be present on the web somewhere - just couldn't locate it perhaps? Are there published minutes of meetings or records of the formal discussions at CSG and EMF? These may be on the web through the password protected portal but should these be made available to all for transparency? Having logged on to the website I found the stakeholder engagement plan online and would question if it needs to be in the appendix as well?</p> <p>b) In addition the engagement plan has not been updated with dates of meetings and events since quite early in the plan which just makes it difficult to see how well the SMP has been disseminated and discussed locally.</p> <p>c) Is there a communications plan and has there been any press or media advertising of the SMP consultation other than the web to ensure maximum public and stakeholder involvement?</p> <p>d) Feedback from the few stakeholders that commented pre-Xmas 2009 (in the appendix report) was for greater clarity on when they could feedback to the process.</p> <p>e) There is an early statement in the appendix that there was no distinction to be made between Key Stakeholders and Other stakeholders.</p>	<p>Can the team please:</p> <p>a) confirm that the final version of this appendix will include a stakeholder plan, including stakeholder lists and a full record of meetings with CSG and EMF?</p> <p>b) confirm that engagement data will be up-to-date?</p> <p>c) confirm that a communication plan was prepared?</p> <p>d) clarify whether stakeholders had time to provide feedback? How did CSG manage these queries and stakeholder?</p> <p>e) clarify whether any stakeholder analysis undertaken to establish this and also to direct focussed engagement with those with the most at risk/stake in the plan?</p>	Review of Draft	Karen Thomas	16-Aug-10	<p>CCPL lead the consultation and engagement process and need to supply the required information for incorporation into Appendix B. point d) is covered in the consultation report with the text "The aim of this report is to provide feed back to all of these consultees, both in acknowledgement of their contribution to the process and to allow them to understand how responses have been taken into consideration in developing the final SMP2 document. This will allow the CSG and EMF to determine whether the comments raised through the consultation have been adequately dealt with before adopting the SMP2. As part of this process the CSG were informed of comments received during the public consultation period from all sources in July 2010 in order to agree where, as a result these comments, a change to the draft preferred plan should occur. " and in Section B2.1 with the text "It was agreed at the outset that the CSG should have a minimum of four weeks to review SMP tasks as required throughout the study. This was built into the programme in order to accommodate this. " CCPL contribution to the remaining points are as follows: a) confirm that the final version of this a</p> <p>Confirmed that the final version will include a copy of the Stakeholder Engagement Plan (SEP) that we have been working to - which was drawn up and agreed by the CSG during Stages 1 and 2 respectively. The SEP has been (and still is) posted in the Stakeholders area of the website www.ciscag.org &lt;http://www.ciscag.org/&gt; for stakeholders to refer to. We need to be aware of the Data Protection Act when considering publishing our Stakeholder List. We may do so but by protecting the names of individuals. We will take advice on the DP Act first.</p> <p>and a full record of meetings with CSG and EMF?</p> <p>Our intention is to include (for publication) only a set of the Agendas used for the CSG and EMF meetings respectively. This is because the full sets of minutes would be exhaustive and some items in the CSG minutes are commercially sensitive. We would respond and supply extract minutes should we receive an individual request to do so. We do have an Actions Log for the CSG (which acts as a good audit trail) and this may be included, if found not to be commercially sensitive. (Julie - I'll have a look through the CSG Actions Log and send an edited copy to you later, if you wish - ple</p> <p>b) confirm that engagement data will be up-to-date?</p> <p>Confirmed that data will be supplied as per the answers given above and below.</p> <p>c) confirm that a communication plan was prepared?</p> <p>Confirmed that the CSG have deemed the relevant part of the SEP to be the communications plan - and this has been followed. The text in Appendix B itself also explains the communication streams used.</p> <p>d) clarify whether stakeholders had time to provide feedback? How did CSG manage these queries and stakeholder?</p> <p>Julie - you said that you were answering this one, but no doubt you are saying that Yes they were given the full 3 months public consultation period plus a further week following the reminder email sent to all stakeholders and ciscag reps. We have also included any late responses etc.</p> <p>e) clarify whether any stakeholder analysis undertaken to establish this and also to direct focused engagement with those with the most at risk/stake in the plan?</p> <p>Yes, a Summary Table has been drawn up and will be included in Appendix B which provides (in precis text) the responses received from the Stage 4 public consultation. Once the policies have been confirmed, the table will be sent to these respondents.</p>	Appendix B section B4 and section B2.1. To be completed for final SMP.	<p>I cannot access the SEP report but am attempting to do so. However, the majority of points have been addressed and generally satisfied.</p> <p>In terms of sharing stakeholder comments on the website, and with reference to item 15 above, the stakeholder tables are a good record of the comments raised but I assume that the tables will be augmented with a column to show how the comments have been taken on board i.e. led to a change in policy, a change in text, will be addressed in the action plan or are simply noted. This will help in ensuring stakeholders know that their comments have been addressed.</p> <p>Some suggestions that may help with the SMP dissemination:</p> <ul style="list-style-type: none"> <li>- names and addresses can be removed and replaced with organisations or generic titles for the public.</li> <li>- with regard to point E if the Comms/Plan or SEP does not currently address the need to engage directly with individuals and communities affected by changing management policies then this could be addressed through a new Comms plan linked to the dissemination of the SMP.</li> </ul>		Karen Thomas	08-Sep-10
17		23-Apr-10	Social	Engagement	Main Report Ch.3 Appendix B	<p>Effective engagement with spatial planners is important through both the development and implementation of the SMP, but I have not seen any discussion on how they were involved during SMP development nor on how links will be pursued.</p>	<p>Could the Project Team comment on the extent and effectiveness of engagement to date? If this has not been documented in the SMP then further comments should be added, possibly in Chapter 3. Also please confirm that appropriate actions will be included in the Action Plan to ensure effective integration with the statutory planning system will be achieved.</p>	Review of Draft	Steve Jenkinson	16-Aug-10	<p>Discussion on links to spatial plans added to chapter 3. This discusses identification of CCMA's and that the Cornwall Council forward planning team have been consulted throughout the SMP process which has occurred in tandem and has fed into their Local Development Framework Core Issues and Options development. CCMA locations and actions flagged in the action plan.</p>	Chapter 6, Chapter 3.4.1	Satisfied		Steve Jenkinson	08-Sep-10

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18.1		23-Apr-10	Social	Resilience/Adaptation	Main Report Ch. 5; eg. PDZ4, Page 26	<p>Where there is a need for using the coastal change pathfinder approaches, I assume that this is clearly set out. It would be good to include a summary of locations where this future approach might be appropriate. For example, Unit 7.4 appears to have property that may be at greater risk now over the plan period. Economic assessment indicates that defending will be difficult to justify, so is this an area where the outcomes from Pathfinder trials might help, for example where there may be a need to allow for caravans to move to adjust to an eroding cliff? [JH]</p> <p>In locations where there are small numbers of properties at risk of erosion or flooding there is scope for considering adaptation. I recognise that adaptation is discussed in the SMP in various parts of the reports, but are opportunities for more specific consideration in the first epoch being overlooked? [SJ]</p>	<p>Can the team please clarify whether Unit 7.4 is a location where the Pathfinder studies may help? Are there any other locations where this should be a consideration? Also, can the team clarify how many properties and other major assets are relevant? [JH]</p> <p>Could the Project Team confirm that the preferred policy options throughout the SMP reflect the potential opportunities for adaptation where few properties appear to be at risk, and that appropriate actions will be included in the Action Plan to take these forward? It is important to draw out those areas where adaptation measures may be appropriate. [SJ]</p>	Review of Draft	Jim Hutchison Steve Jenkinson	16-Aug-10	<p>If the longer term MR and NAI policies are to be taken forward for locations such as Downderry, Praa Sands, Mounts Bay, Coverack and St Mary's, the Coastal Management Plan / Pathfinder approach may provide a good route forward. As with North Norfolk, a Council led and council wide approach seems to be best, so there may only need to be a single plan for the Cornwall sites and one for Isles of Scilly.</p> <p>An action that could support this might be along the lines of:-</p> <p>Policy Unit: Cornwall wide, and loS wide Action: Prepare a Coastal Management Plan Timescale: Short to medium term Objectives: To develop a positive vision and address the consequences of coastal change. To address many of the social and community issues that the SMP was unable to tackle. Indicators: Coastal Management Plan web-site set up. Workshops held at key settlements; Community vision for adaptation produced. Partners: CC/loS C; Town and Parish Councils; Defra; EA; English Heritage, NE Priority: High Funding: FDGIA</p> <p>We are not sure of the reference to PU7.4 at Duporth and relevance of Pathfinder approach – the description of moving caravans does not seem to fit this PU??</p>	To be incorporated into action plan following agreement with CSG.	QRG Review continues on next line in column G			
18.2		08-Sep-10				<p>The Action Plan includes a number of references to community adaption strategies. Understandably at this stage there is no detail on how these will be pursued, although funding bodies have been identified. Satisfied. [SJ]</p> <p>Not Satisfied - no response to property numbers. [JH]</p>	<p>Can the team please ensure a reference to numbers of properties is included where a Pathfinder approach might be appropriate, so this data can be included with collation of data from all plans. If not known, can the team please explain how this data will be assessed? Note, reference to caravans was in respect to a policy for dealing with caravans in this plan area. Is there a "roll back" policy in existence for example? [JH]</p>	Review of Resubmission	Jim Hutchison	26-Oct-10	<p>Keith Cole is checking with NQRG to get clarification on this item on behalf of CSG. N.B. The CSG have attempted to get some clarification on this issue from the NQRG team directly but were unable to as at the time of submission.</p>		Subsequent to response on review sheet CSG have advised (e-mails 04 & 05 Nov) that they will provide in the SMP data on locations where the preferred plan and policies require an adaptation of the frontage to occur (at some level) in order to adapt to the impacts of on-going coastal erosion, sea level rise and climate change in relation to communities and built assets. Satisfied.	Steve Jenkinson pp Jim Hutchison	05-Nov-10	
19	Showstopper	23-Apr-10	Environmental	Adoption/Approval	Appendix F. Non-Technical Summary, bottom of page 3.	<p><b>Natural England involvement:</b> "Due to the intricate and multivariate nature of SMPs, the appraisal took the form of a qualitative assessment based on professional judgement, GIS analysis and..." Were NE a party to the assessment of impacts on Natura 2000 sites?</p>	<p>Please clarify whether NE were a party to the assessment and whether Appendix I conclusions are being reported in the NTS.</p>	Review of Draft	Liz Galloway	25-Aug-10	<p>Natural England were consulted on the HRA and SEA, and were involved in the assessment process, namely through the local NE contact (Kevan Cook) who was also on the CSG who has agreed with the assessment and reporting.</p>	Letter of agreement to findings and SMP to be obtained to be presented with the final.	Satisfied	Karl Fuller pp Liz Galloway	08-Sep-10	
20.1		23-Apr-10				<p>There are a number of Environment and Nature Conservation sections that do not reference all of the designates sites (SSSI/SAC/SPA/Ramsar) located within each PDZ. For example: - PDZ1, PDZ2 Polruan to Polperro SAC should also reference in policy summary) - PDZ4 p5 - Include Cuckoo Rock to Turbot Point SSSI. - PDZ 6 Fal and Helford SAC - PDZ10 Hayle Estuary and Carrack Gladden SSSI &amp; Aire Point to Carrick Du SSSI. p25 SEA summary should reference Gwithian to Mexico Towers SSSI, Godreyhead to St Agnes SSSI.</p> <p>PDZ11 Introduction should reference SSSIs/SACs present along stretch of coast. Environment and Nature conservation summary should also reference SSSIs and SACs. p23 SEA summary should reference SSSIs in MA30 (Trevounance Cove, Cligga Head &amp; Penhale Dues SSSIs) - PDZ14 River Camel SAC - PDZ15 p16 Boscastle - should also refer to impacts to the Tintagel-Marshland-Clovelly Coast SAC in 3rd para - PDZ16 Duckpool &amp; Furzey Cove SSSI, Boscastle to Widemouth SSSI - PDZ17 SSSIs - Steeple Point to Marshland Mouth and Marshland to Clovelly Coast. p1 Summary should make reference to the fact that the entire stretch of coast is SSSI and SAC - PDZ18 SEA summary should include Big Pool and Browarth Point SSSIs and Isle of Scilly SPA and Ramsar.</p>	<p>Can the team amend the environment and nature conservation sections to list statutory sites within PDZ boundary?</p>	Review of Draft	Nikki Hiorns	16-Aug-10	<p>Yes - text amended</p> <p>Yes - text amended</p>	<p>PDZ1, PDZ4, PDZ6, PDZ10</p> <p>PDZ11, PDZ14, PDZ15, PDZ16, PDZ17, PDZ18</p>	QRG Review continues on next line in column G			
20.2		08-Sep-10	Environmental	Conservation	Main Document Chapter 4	<p>PDZ1 Pg 18 – Policy unit table - for 2105 the amendment should read MR not MRI? The comment that there is no impact on the SAC, is that because the boundary of the SAC is at Mean Low Water? If so this should be stated as has been done on PDZ2. PDZ4 Page 5 - correct name is Gerrans Bay to Camels Point. The 's' has been left out. Page 24 - HRA - is reference to the SAC correct? I did not think the SAC was anywhere near this section of the coast? The statement of 130m I don't think is correct. It appears that this text is the same for all MA's and is not tailored specifically to the MA that is being assessed. Please review and amend as appropriate. PDZ5 Pg 3 - All SSSI designations should be mentioned (make it consistent with other PDZs). PDZ5 Pg 35 -SEA - no mention of Malpas Estuary SSSI and associated impacts. For AA – should specify if loss/gain of intertidal is for the SAC or not. Please address. Pg 53 - HRA – please clarify whether the figures given for intertidal loss are for the whole SAC or for this specific MA? PDZ6 Page 3 - maybe an idea to list the SSSIs by name to be consistent with other F</p>	<p>Please respond on this review sheet; make amendments to documents as necessary.</p>	Review of Resubmission	Thomas Schindl pp Nikki Hiorns	28-Oct-10	<p>PDZ1 amended for each MA HRA summary (pp. 16, 23, 30). PDZ4 p.5 text changed to Camels Cove. PDZ4 HRA text amended for each MA. Each HRA summary has been completed / amended for PDZ10. PDZ11, SEA summary p.28 text amended. PDZ18 - all SSSIs across archipelago have been added on p.5</p>	<p>PDZ1, p.16,23,33. PDZ4, p.5, 23,29,33. PDZ10, p.19,22,27,37. PDZ11, p.28 PDZ18. p.5</p>	QRG Review continues on next line in column G			

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20.3		05-Nov-10				<p>PDZ10 -pg 12 &amp;18 - HRA needs to be completed.</p> <p>PDZ11 pg 28 SEA - assessment of impact on SSSI needs to be made, as opposed to a statement that effects 'should' be avoided.</p> <p>PDZ18 - pg 5 - consideration needs to be given for all affected SSSIs, as each SSSI is referred to in later sections of the report for SEA's and HRAs. Currently reads that that there is only the Big Pool and Browarth Point SSSI. Please address.</p>										
						<p>Noted for all except for comments on page 53 HRA – difficulty finding where these concerns are addressed.</p>	<p>Please clarify by response on this review sheet.</p>		Thomas Schindl pp Nikki Hiorns							
21.1		23-Apr-10	Environmental	Conservation	Main Report Chapter 4	<p>There are a number of areas within the PDZs which do not include discussion on the impacts on various designated sites, for example:</p> <ul style="list-style-type: none"> <li>- PDZ4 p19 – include impacts to SSSI with regard to Gorran Haven. Reference possible impacts to Cuckoo Rock to Turbot Point SSSI in relation to HTL/MR/MR policies at East Portholland.</li> <li>- PDZ5 pp36-38 include area of habitat loss from coastal squeeze identified in HRA at Gweek in discussion text. HRA summary should reflect impacts in the Helford not those in the Fal.</li> <li>- PDZ6 pp14-17 Policy discussion for Coverack and Cadgwith should include implications for adjacent SSSIs - Coverack Cove to Dolor Point SSSI, Kennack to Coverack SSSI. The SEA summary should also make reference to these SSSIs.</li> </ul> <p>PDZ8 p35 discussion should make reference to Penless Point SSSI and impacts resulting from HTL policy at Cliff road.</p> <ul style="list-style-type: none"> <li>- PDZ10 p16 discussion should include impacts to the Hayle Estuary SSSI in relation to the HTL and MR policies and the risk to favourable condition of SSSI.</li> <li>- PDZ16 pp20-24 Better reference should be made of the potential impacts of the HTL and MR policies at Bude, Summerleaze and Crooklets with regard to Bude Coast SSSI and Tintagel-Marshland-Clovelly Coast SAC in discussion text and summary tables.</li> <li>- PDZ18 St Marys - Impacts to terrestrial/fresh water SSSIs (Higher and Lower Moors) as a result of MR policies should be referenced in the discussion text and SEA summary.</li> </ul>	<p>Can the team consider including additional text to these PDZs to clarify impacts, and amend HRA summaries as necessary?</p>	Review of Draft	Nikki Hiorns	<p>16-Aug-10</p> <p>Yes - text amended</p>	<p>PDZ4, p19, PDZ5, pp36-38, PDZ6, pp14-17</p>	<p>ORG Review continues on next line in column G</p>				
						<p>PDZ8 p35 discussion should make reference to Penless Point SSSI and impacts resulting from HTL policy at Cliff road.</p> <ul style="list-style-type: none"> <li>- PDZ10 p16 discussion should include impacts to the Hayle Estuary SSSI in relation to the HTL and MR policies and the risk to favourable condition of SSSI.</li> <li>- PDZ16 pp20-24 Better reference should be made of the potential impacts of the HTL and MR policies at Bude, Summerleaze and Crooklets with regard to Bude Coast SSSI and Tintagel-Marshland-Clovelly Coast SAC in discussion text and summary tables.</li> <li>- PDZ18 St Marys - Impacts to terrestrial/fresh water SSSIs (Higher and Lower Moors) as a result of MR policies should be referenced in the discussion text and SEA summary.</li> </ul>					<p>16-Aug-10</p> <p>Yes- text amended</p>	<p>PDZ8 p35, PDZ10, p16PDZ16, pp20-24, PDZ18</p>				
21.2		08-Sep-10	Environmental	Data and Mapping	General	<p>PDZ4 pg 19 - although comments have been incorporated for Gorran Haven, no similar assessment has been made for Pentewan, Mevagissey and Portmellon regarding impacts on designated sites from preferred policy option?</p> <p>PDZ5 - amendments made as result of Nikki's comments could not be identified in the document! Please advise.</p> <p>PDZ 6 - Pg 16 and 18 – some detail regarding the potential implication would be useful regarding impacts on the adjacent designated sites. Also, was any attempt to mention adjacent SSSI sites in the SEA made?</p> <p>PDZ8 - Text not amended?</p> <p>PDZ10 changes noted, but no reference made to SSSI favourable status. However, maybe not a significant issue? CSG to consider.</p> <p>PDZ16 - noted; however is there a contradiction? With regard to the text in the discussion and that in the HRA summary with respect to impact on the SAC. HRA implies no impact, but on page 27 there is comment that the MR policies 'would inevitably have some impact on .. the Tintagel-Marshland-Clovelly Coast SAC'. Please clarify.</p> <p>PDZ 18 – noted. Satisfied.</p>	<p>Please respond on this review sheet; make amendments to documents as necessary.</p>	Review of Resubmission	Thomas Schindl pp Nikki Hiorns	<p>26-Oct-10</p>	<p>PDZ4 - there are no designated sites (SSSIs) adjacent to the policy units at Pentewan, Mevagissey and Portmellon so no reference to impacts was deemed necessary. PDZ5 - some amendments made without track changes - have identified edits with highlighting. PDZ6 - additional explanation made on p.17. PDZ8 - text previously amended on p.38-39 and further added to. PDZ10 - reference to SSSI favourable status added on p.27. PDZ16 - text in PDZ discussion stands, HRA has been re-assessed to provide better reflection of potential impacts.</p>	<p>PDZ5, PDZ6, p.17. PDZ8 p.38-39. PDZ10 p.27.</p>	<p>Explanation from CSG noted. Satisfied.</p>	Thomas Schindl pp Nikki Hiorns	05-Nov-10	
22		23-Apr-10	Environmental	Data and Mapping	General	<p>English Heritage has been undertaking Rapid Coastal Zone assessments around the English coastline.</p>	<p>Could the Project Team advise whether any of these assessments cover the SMP area, and if so whether they were used to inform development of the plan?</p>	Review of Draft	Steve Jenkinson	<p>25-Aug-10</p>	<p>No RCZA has been carried out for Cornwall and the Isles of Scilly. However, we have obtained and used all the HER data available, as well as the EH data layers, and therefore have incorporated all EH requirements in relation to the historic environment.</p>	<p>No edits or additions necessary.</p>	<p>Satisfied</p>	Steve Jenkinson	08-Sep-10	
23.1	Showstopper	23-Apr-10	Environmental	Decision Making	Appendix J (WFD)	<p><u>Water Framework Directive and SEA:</u> Section 4 seems to focus on avoidance and mitigation - but are there opportunities which can be identified, to be pursued through later stages? Are impacts from the WFD conclusions being factored into the SEA as impacts and/or opportunities. For example (1) relating to heavily modified waterbodies, "any further enhancements, such as to increase connectivity between floodplains and the channel, can only be proposed at a scheme level." If not included at SEA level, its likely to be lost at scheme level - opportunities need to cascade through the levels.</p>	<p>Please consider the significance of WFD effects (both positive and negative) and confirm that they are included in the impact assessment. Also incorporate mitigation requirements and define opportunities.</p>	Review of Draft	Liz Galloway	<p>25-Aug-10</p>	<p>WFD is a standalone assessment relating to WFD process/requirements. The relevant WFD findings and requirements are implemented in the SMP Action Plan.</p>	<p>Chapter 6 action plan</p>	<p>ORG Review continues on next line in column G</p>			
23.2		08-Sep-10	Environmental	Decision Making	Appendix J (WFD)	<p>While the WFD is a stand alone report, where there is a conflict with WFD objectives this should be reflected in or consistent with the SEA report. Otherwise the latter will have failed to report significant environmental effects.</p> <p>Satisfied with WFD mitigation to be included in the Action Plan but helpful to explain where included.</p>	<p>Can the team confirm that the SEA is consistent with the WFD assessment so that predicted deterioration is included as a significant adverse effect?</p> <p>Please identify where WFD related measures are included in the Action Plan.</p>	Review of Resubmission	Karl Fuller pp Liz Galloway	<p>26-Oct-10</p>	<p>The revised WFD assessment has been reviewed and the relevant findings and conclusions are summarised in the SoEP (Section 3), along with reference to the final WFD report in Appendix J of the SMP.</p>	<p>SoEP, Section 3</p>	<p>Satisfied</p>	Liz Galloway	05-Nov-10	
24		23-Apr-10	Environmental	Decision Making	Main Report Chapter 4 PDZ 10 p18	<p>Unclear why HTL policy is required for 'split' (?) feature inside the estuary to the north of South Quay - spit and HTL policy clearly identified on Chapter 5 Policy Map for Management Area 27 - Hayle Estuary. Appears to be lagoon (?) on landward side of spit.</p>	<p>Can the team please clarify what the feature is and the choice of policy option, and amend the document as appropriate?</p>	Review of Draft	Nikki Hiorns	<p>16-Aug-10</p>	<p>The feature is an area of sand which dries at low tide. The hold the line policy applies to the south quay and Carnsew Pool walls / structures but there is no intent to apply it to the estuary channel features. The mapping mistakenly follows the outline of the feature, so policy mapping has been changed.</p>	<p>PDZ10, policy mapping for MA27 has been changed</p>	<p>Satisfied</p>	Thomas Schindl pp Nikki Hiorns	08-Sep-10	
25		23-Apr-10	Environmental	Decision Making	Main Report Chapter 4 PDZ 14 p19	<p>Amble Marshes SSSI - question sustainability of HTL policy for 1st Epoch. If the SSSI is unfavourable condition due to groundwater levels, may it not be better to look at MR generating a more sustainable complex of habitats? Unless the current issues can be resolved easily.</p>	<p>Can the team comment on the sustainability of the proposed HTL policy option, and whether MR may be more appropriate?</p>	Review of Draft	Nikki Hiorns	<p>16-Aug-10</p>	<p>Amble marsh is currently a freshwater habitat, so HTL in the short term allows for phased in land migration of the freshwater habitat prior to creation of saltwater habitat that MR would produce. In the short term, the Agency is carrying out floodplain channel works to improve wetting on the current freshwater grazing marsh to bring this into favourable condition.</p>	<p>No changes</p>	<p>Satisfied</p>	Thomas Schindl pp Nikki Hiorns	08-Sep-10	

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26		23-Apr-10	Environmental	Decision Making	Main Report Chapter 4 PDZ 18 Bryher	Justification for HTL at Great Popplestones is unclear - what assets are being defended, fresh water source? Suggest policy unit is altered to avoid HTL policy along northern shore of Gweal Hill.	Can the team please clarify reason for the choice of policy option and whether management area should be amended to remove undefended coast from HLT policy?	Review of Draft	Nikki Horns	16-Aug-10	Policy unit boundaries have been adjusted. Text amended to clarify.	PDZ18, pp44-45	With regards to text, changes have been reviewed and I note from your response unit boundary changes have been made. Satisfied.		Thomas Schindl pp Nikki Horns	08-Sep-10
27		23-Apr-10	Environmental	Decision Making	Main Report Chapter 4 PDZ 18 St Agnes	Big Pool HTL policy - Alter policy units? Peregils slips to Ginamoney Carn and Ginamoney Carn to Browarth Point, to avoid HTL policies over additional sections of coast including Burnt Island.	Team to consider amending management areas to exclude undefended coast from HTL policy.	Review of Draft	Nikki Horns	16-Aug-10	Have amended policy unit mapping and policy choice mapping	PDZ18, MA46 policy mapping	Satisfied		Thomas Schindl pp Nikki Horns	08-Sep-10
28		23-Apr-10	Environmental	Decision Making	Main Report Chapter 4 PDZ p15-16 & p18 HRA Sect 5.3.27	Hold the line is a valid option to protect the N2K site (management necessary for nature conservation) and so the statement on page 16 is correct. However it may not be sustainable to HTL in situations such as this in the long term. If it is not considered sustainable to HTL here for 100 years, then MR in epoch 2 or 3 may be a valid option, if this approach is taken, then compensatory freshwater SPA habitat will be required and this also needs to be taken through the alternatives and IROPI route. If it is considered sustainable to HTL for the next 100 years, then HTL is a valid option. HRA summary should make reference to Marsion Marsh. HRA – likewise discussion on the impacts to the SPA is correct in relation to the proposed policies, but conclusions are dependant on whether HTL is sustainable at the site for the long-term.	Can the team comment on the long term sustainability of the proposed policy options in these situations, and whether MR may be more appropriate in later epochs?	Review of Draft	Nikki Horns	16-Aug-10	Whilst HTL is not the ideal policy, it is technically feasible and ensures that the SPA is not lost to tidal encroachment. It is not clear at the SMP level that appropriate alternative locations are available for the Marsh, and the SMP will need to action in particular a Spatial Planning with support from a Mounts Bay Strategy to further explore if relocation options are deliverable. Therefore the CSG have strongly steered the policy at this location toward HTL through the 3 epochs, whilst accepting that HTL may not be sustainable in the long term and alternative strategies will need to be scoped at strategy level. In addition, EA and NE strongly influenced the policy selection for Marazion Marsh.	No changes	Satisfied		Thomas Schindl pp Nikki Horns	08-Sep-10
29		23-Apr-10	Environmental	Resilience/Adaptation	Appendix J Assessment Table 2a	Table 2a sets out the WFD policy objectives that are considered relevant to the water body. In most cases only one objective is referred to and it is difficult to understand how this can be the case, particularly where WFD2 has been excluded. Are there potential effects on inter-tidal habitat that are not being considered as a result of this?	Please clarify the reasons why WFD2 has been considered not to be a relevant consideration to a number of water bodies.	Review of Draft	Karl Fuller	16-Aug-10	WFD objectives 2 and 3 will be reviewed and if relevant will be included, further details will be included in the assessment.	No changes	The revised WFD report identifies objectives 2 and 3 as being relevant in most cases. Satisfied subject to table being amended to note changes.		Karl Fuller	08-Sep-10
30.1	Showstopper	23-Apr-10	Environmental	Risks and Impacts	Appendix F: SEA: Main body of Environmental Report para. 1.9.4.	SEA Methodology: Assessment of Impacts: This explanation seems to be justifying how the SMP2 fulfils the same role as SEA, whereas in reality, the Environmental Report (ER) is not achieving the key objectives of SEA. The ER fails to identify significance of effects, potential risk factors and benefits, or the reporting of likely impacts of the plan. The whole SEA is reduced to a grey area of slightly positive and slightly negative effects which are difficult to reconcile with, for example, the statement that "as a whole, (the SMP2) has a likely significant effect on the majority of Natura 2000 sites" in Appendix I. These are potential show-stoppers and of major significance. Instead of reporting this, there are simply reassurances in a number of places that a sustainable balance was achieved across a range of complex issues. The role of SEA is to make this thinking transparent - to learn of the show-stoppers, trade-offs and the decision making process.	Please describe the impacts in a way that reports the range of risks and benefits to the plan in an accurate and representative way. Also, interpret the use of the word 'significant' used in the Main SMP2 Report relative to levels of significance in SEA methodology.	Review of Draft	Liz Galloway	25-Aug-10	It is unclear how and where this justification arises within the document. It is clearly stated in Sections 1.6 and 2.2 of the ER that the SEA reports on the assessment of effects of the SMP. The fact that there has been an iterative process whereby the SMP policies have been influenced by the findings of the SEA in order to reduce or avoid significant impacts is a standard process. The significance of the effects has been described in terms of method and definition within Sections 2.2 and Section 4, and throughout Section 4 the assessment at the PDZ level within the Section 4 tables presents the achievement or not of the objective.	See SoEP.	QRG Review continues on next line in column G			
30.2		08-Sep-10				The text in section 4.2 clearly records that there will be impacts on features of national importance, particularly relating to the historic environment (scheduled monuments), but also to biodiversity and landscape. Using the criteria in Table 2.1 these should be assessed as being of major significance. Similarly, impacts on listed buildings should be assessed as moderate. However, these impacts do not appear to feature in the document (either in the main report or Annex 1) where the vast majority of impacts are recorded as minor. The concern is that the lack of a record of any major risks or trade offs is because the assessment criteria have not been correctly applied.	Can the team explain why impacts on features of national interest have not been assessed as being major, and similarly for features of regional interest?	Review of Resubmission	Karl Fuller pp Liz Galloway	26-Oct-10	Policy changes following the public consultation resulted in a number of changes, and as a result a re-assessment of the effects of the policies was undertaken, along with a re-assessment based on the more detailed policy intent details within Chapter 4 PDZ reports. The findings of the reassessment are presented in Appendix 1 and 2 of the SoEP, and the conclusions are summarised within Section 3 of the SoEP on a PDZ by PDZ basis. The initial assessment was based on the achievement or not of the SEA objectives, and less impression was made on moderate or major beneficial impacts, which following policy changes and further policy intent descriptions have been revised in relation to their significance. Furthermore, detailed assessment that provides the 'final' word in relation to the impacts on the European Sites is presented in the Final HRA (Appendix J).	SoEP, Section 3, plus SoEP appendices 1 & 2	QRG Review continues on next line in column G			
30.3		05-Nov-10				1. The SoEP needs to note that the ER which was used for consultation alongside the Plan was in reality the final version and marked 'draft' in error. If further consultation on a final ER took place please include details.	Please indicate the status of the ER/draft ER and SoEP in the SoEP.	Review of Resubmission	Liz Galloway		Included statement to this effect at the end of Section 2 (on page 8) of the final SoEP.	See SoEP.				
31	Showstopper	23-Apr-10	Environmental	Risks and Impacts	Appendix I, para 6.1.2. Table 2.1	Habitats Regulations Assessment: Its not clear whether the likely effects on Natura 2000 sites have been factored into the SEA. Why are none of these significant, even though IROPI is being considered? Overall the SEA has assessed that no major impacts will affect the integrity of the Natura 2000 Sites within or adjacent to the SMP boundary. According to Table 2.1, seven sites will be affected by all of the management options - the remaining four may or may not, depending on the option chosen. How does this sit with the comment that, "as a whole, (the SMP2) has a likely significant effect on the majority of Natura 2000 sites" in Appendix I? More information on the timing of future stages of HRA would be helpful here.	There seem to be conflicting statements in relation to the likely impact on Natura 2000 sites: (1) please clarify and ensure that the SEA is reporting the full (likely) impacts and (2) please indicate the timescale of AA, i.e. further stages in Table 2.1.	Review of Draft	Liz Galloway	25-Aug-10	The HRA identified that up to 5 and previously 6 possible PDZs could result in an adverse affect on integrity. However, those were prior to the inclusion of mitigation measures that would prevent (or in one case (PDZ5) further assessment and discussion with NE and EA that clarified no impact) an adverse effect. These have been identified in the Section 6 of the HRA, and also carried forward into the SMP Action Plan. The revised deliberation and assessment AT PDZ5 (with NE and EA) has resulted in changes to the significance and overall prevention and avoidance of adverse effects remaining after mitigation. The revised HRA reports this particularly in Section 5, 6 and Appendix C5, and the SoEP also contains the updated findings and resulting conclusions in relation to impacts of the policies.	HRA (section 5,6,App C) and SoEP	Given subsequent changes since this question was posed, it is now no longer relevant. Satisfied		Karl Fuller pp Liz Galloway	08-Sep-10
32.1	Showstopper	23-Apr-10	Environmental	Risks and Impacts	Ch 4, PDZ 4 MA08	Establishing significance: A key task of SEA is to establish the likely significance of effects of the plan in a systematic way; environmental effects are reported in Section 4 of the main report. However, the use of the term "significant" in the SMP2 is unclear and inconsistent if related to SEA Appendix where no effects of the preferred management options are of greater than 'low' significance. For example, significance of receptors is described at Pentewan (MA08 in Ch. 4 of the Main Report), "a significant flood risk still exists in and around the Pentewan inner harbour ...village is wholly designated as a conservation area ...there is a very significant potential erosion risk along the length of the beach" (my italics). Mevagissey, is similarly described as having a significant environment vulnerable to flooding, so would not HTL create significant positive effects?	Please consider: (1) whether effects of change brought about by the proposed plan are being assessed, (2) whether all effects are included, e.g. negative effects on HD sites, positive effects on population and (3) whether significance is being recorded according to SEA methodology.	Review of Draft	Liz Galloway	16-Aug-10	The use of 'significant' is derived from the engineering terms for flood risk, however, the SoEP summarises by MA the impacts and their significance at the regional level providing the concluding clarity.	See SoEP.	QRG Review continues on next line in column G			



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32.2		08-Sep-10				Satisfied with explanation of use of the term "significant". Questions posed remain unanswered, but should be covered by item 30.	Please refer to item 30.	Review of Resubmission	Karl Fuller pp Liz Galloway	26-Oct-10	Refer to response to item 30		Satisfied		Karl Fuller pp Liz Galloway	05-Nov-10
33		23-Apr-10	Environmental	SEA/AA	Annex II Table 1.8	Omits Duckpool to Furzey Cove SSSI, Amble Marshes SSSI, Marshland to Clovelly Coast SSSI.	Can the team amend the table?	Review of Draft	Nikki Hiorns	25-Aug-10	Duckpool to Furzey Cove SSSI is identified in Table 1.5. Omission of the other two was an error due to GIS clipping, however, the sites are all presented in the assessment tables in Annex I of the ER. Section 4 of SoEP provides an update to Annex II table 1.8.	Section 4 SoEP	Additional table in SoEP noted – satisfied.		Thomas Schindl pp Nikki Hiorns	08-Sep-10
34.1	Showstopper	23-Apr-10	Environmental	SEA/AA	Appendix F Environmental Report: Non-Technical Summary pp.3 & 4; Sect 1.8.2	<p><b>SEA Procedure: Finality of ER:</b> There is a lack of clarity around the requirements of an ER throughout, for example, "however it should be noted that these assessments are only preliminary until consultation and finalisation of this Environmental Report is complete". (p.3, NTS) What does this mean? The Environmental Report should contain an authoritative and accurate assessment of the likely impacts of the plan and is final, once published. Any amendments required due to new information can only be made in the form of Addenda.</p> <p>6.1.1 states "This report is provided for consultation simultaneously with the SMP itself." It is therefore the final ER, and cannot change now. Revisions can be made either in an Addendum or some matters may be addressed by an extended 'Statement of Particulars' that deal with the issues arising out of consultation. The ODPM guidance mentioned as a reference provides a clear and detailed description of elements required.</p> <p>The same procedure will need to be applied to all similar comments on the SEA.</p> <p><b>Alternative policy options should have been assessed already.</b> "Feedback received will shape the finalisation of this report and the evaluation of the environmental effects of the SMP". Again, this remark suggests that the assessment is not final. "As a component of the Environmental Report, monitoring measures will be specified post-assessment." If they are to be included in this report, then it must be pre-publication.</p> <p><b>Sect 1.8.2 "The SEA will form a component of the wider assessment mechanisms for the SMP which also includes..." (AA and WFD). This statement is incorrect: the SEA should report all known impacts on the environment, including AA and WFD. Uncertainties should also be described, with parameters of risk.</b></p>	<p>Can the CSG clarify if we are to assume that this wasn't the case for WFD assessment? Are the findings of the WFD assessment and the ER consistent?</p> <p>Item 23 also refers.</p>	Review of Draft	Liz Galloway	25-Aug-10	<p>This statement is purely noting that consultation on the draft SMP and ER could result in changes to the SMP policies and these would be re-assessed. Where such changes have taken place the overall findings and conclusions have been presented in the SoEP. There has been no new information following the production of the ER, the only changes to impacts are based on any changes to policies and more detailed formulation of policy activities or intentions.</p> <p>See SoEP.</p> <p>QRG Review continues on next line in column G</p> <p>All the policy options were assessed (see Section 4), and further detailed assessment of the preferred policy was presented in Annex I of the ER. Monitoring measures are recorded in Section 5 of the ER. The statement regarding the AA and the WFD was intended to identify that these two assessments are separate to the SEA as it stands, being that they are requirements that result from other legislation. However, the findings of the HRA were carried through into the ER. All final conclusions are presented in the SoEP.</p> <p>See SoEP.</p>					
34.2		08-Sep-10				<p>1 Satisfied</p> <p>2 Response states that findings of HRA were included in ER.</p>	Can the CSG clarify if we are to assume that this wasn't the case for WFD assessment? Are the findings of the WFD assessment and the ER consistent?	Review of Resubmission	Karl Fuller pp Liz Galloway	26-Oct-10	Please refer to response to item 23		Satisfied		Karl Fuller pp Liz Galloway	05-Nov-10
35	Showstopper	23-Apr-10	Environmental	SEA/AA	Appendix F Environmental Report: NTS (page 3 last para) and para 6.2.2.	<b>Mitigation and Monitoring:</b> "In addition to providing the results of this assessment, the Environmental Report also provides monitoring and mitigation measures to ensure that the effects ..... are minimised as far as possible" Where are they? "The approach to, and requirement for, monitoring and mitigation is discussed in Section 7." Where is this Section 7? (Section 7 is References according to the index. No section 7 in Main Report)	Please define the requirement for mitigation against impacts in the Environmental Report to ensure that this mitigation is recorded and can be re-visited at implementation stages.	Review of Draft	Liz Galloway	25-Aug-10	Mitigation and monitoring is provided in Chapter 5 of the ER, and these have been carried through into the SMP Action Plan.	No edits or additions necessary.	Satisfied		Karl Fuller pp Liz Galloway	08-Sep-10
36.1	Showstopper	23-Apr-10	Environmental	SEA/AA	Appendix F (SEA) Non-Technical Summary p.4 (no para numbers)	<b>Non-Technical Summary:</b> The NTS contains baseline description, SEA methodology and the setting of assessment criteria. The last half page explains how complex the task of assessment is and reassures the reader that "the majority of effects were either minor positive or minor negative". This is inadequate coverage of the likely effects for coastlines which have been described as sensitive and complex due to their natural environment, many international sites, landscape and cultural heritage. There are apparently no effects of moderate or major significance and the reader is bound to ask whether this can really be the case. The reader expects a transparent summary of the key potential impacts here. The NTS also requires information on how the SEA will proceed from this point.	Please revisit the assessment and draw out and summarise in an Addendum to the NTS, the effects of the proposed plan to reflect the assessment in the ER. Indicate the risks, the threats, the opportunities and any showstoppers, covering all receptors and including likely HRA impacts. Please also indicate what happens next in SEA procedure.	Review of Draft	Liz Galloway	25-Aug-10	The SoEP provides further clarified summary for the NTS. However, in relation to significance, as no adverse effect on integrity to European Sites occurs, and given the significant amount of interaction between the SMP development and the SEA, policies have been determined (with additional details of what the measures should or should not entail within the PDZ reports) to minimise impacts and to mitigate for impacts where they are potentially significant.	See SoEP.	QRG Review continues on next line in column G			
36.2		08-Sep-10				The key to this item is the extent to which there are significant effects and whether the assessment criteria have been appropriately applied. The response to item 30 will determine whether an addendum is required.	Please address through item 30.	Review of Resubmission	Karl Fuller pp Liz Galloway	26-Oct-10	Refer to response to item 30		Satisfied		Karl Fuller pp Liz Galloway	05-Nov-10
37		23-Apr-10	Environmental	SEA/AA	Habitats Regs Assessment	The assessment reported in this appendix appears to be incomplete.	Can the team please clarify whether more work is required, and if so when this will be undertaken?	Review of Draft	Andy Parsons	16-Aug-10	Document should clarify the situation. In particular conclusions are clarified. Also, to assist readers, Appendix 1, the whole scoping report, has been reproduced with blue text, rather than black, to differentiate the two documents. This should clarify and also prevent future confusion.	Appendix I	Satisfied		Andy Parsons	08-Sep-10
38.1	Showstopper	23-Apr-10	Environmental	SEA/AA	HRA S 5.3.22 & Appendix C6	PDZ 6 - Second sentence is incorrect - MR policy option at Porthallow is adjacent to the Fal and Helford SAC. Appendix C6 identifies the loss of ~1ha heathland from the Lizard SAC as a result of the MR policies at Kennack & Jangye-ryn. The loss of this SAC heathland should be mitigated or compensated. The loss of this habitat could result in an outcome of 'can not conclude no adverse effect on integrity'.	The team should review the impacts of the proposed policy options on this PDZ and ensure an appropriate response is identified.	Review of Draft	Nikki Hiorns	16-Aug-10	Sections restructured wrt NAEOL and mitigation measures. Should clarify this point and align the assessment better with the formal HRA assessment procedures. Mitigation measures made more clear, and reflect those identified in the assessment tables Appx C. MH 100811	Appendix I	QRG Review continues on next line in column G			
38.2	Showstopper	08-Sep-10	Environmental	SEA/AA	HRA S 5.3.22 & Appendix C6	With regards to Appendix C - note that mitigation is proposed. However, need to confirm that this is mitigation and not compensation! If it is compensation then this has implications regarding assessment of NAEOL. Also question the assessment that 1.2 Ha loss of habitat can be termed as being 'negligible'. With regards to comments made re: PDZ 6, cannot determine if changes have been made?	Can the CSG please comment on the issues raised and clarify changes to PDZ 6?	Review of Resubmission	Thomas Schindl pp Nikki Hiorns	26-Oct-10	The re-assessment of policy following changes and clarification, along with meeting and discussion with Natural England and the Environment Agency resulted in removal of some impact due to additional information from Natural England about site features, and clarification within Appendix C of the HRA has been included identifying that mitigation is mitigation/avoidance, not an adverse effect that requires compensation. At no point is mitigation described an action after the fact (i.e. compensation). See Appendix J revised.		Explanation from CSG noted. Content to go with local adviser's site knowledge and expertise. Satisfied.		Thomas Schindl pp Nikki Hiorns	05-Nov-10

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39		23-Apr-10	Environmental	SEA/AA	Main Report Ch.2	This chapter sets out the conclusion that the SMP has been subject to an HRA.	Can the Project Team update this section by summarising the HRA findings, including the need to submit a Statement of Case to Defra SoS and, if applicable, any further actions to be included in the Action Plan?	Review of Draft	Steve Jenkinson	16-Aug-10	TO INCLUDE IN FINAL SMP REPORT	Appendix I	Appendix I appears to have been updated and confirms the conclusion of the HRA. Subject to similar conclusions being added to the Main Report then satisfied.		Steve Jenkinson	08-Sep-10
40.1		23-Apr-10				HRA summary - states overall there will be no net loss of intertidal, this should be rephrased to indicate losses inside the SAC, and MR compensation measures outside the SAC boundary.	Can the team amend the document to indicate loss inside SAC and proposed against outside SAC?	Review of Draft	Nikki Horns	25-Aug-10	HRA and text in PDZ 5 updated to a) reflect no loss of intertidal within the SEA at Truro upper basin b) additional habitat can be created outside of the current SAC boundary at Truro upper basin.	HRA App C, main report and PDZ5	QRG Review continues on next line in column G			
40.2		08-Sep-10	Environmental	SEA/AA	Main Report, Chapter 4 PDZ 5 p28	Query - it appears that Truro Upper basin is a name change from Truro Town Quay etc (12.5) of policy summaries. Has this been reflected in the discussion and detailed policy development section? I have not been able to identify the track changes/updates that have been made in Chapter 4. In the HRA summary (pg 35) no track changes to indicate change in text with respect to intertidal loss and the SAC as per Nikki's comments?!	Can the CSG clarify please?	Review of Resubmission	Thomas Schindl pp Nikki Horns	26-Oct-10	Changes were made without track changes being switched on in the document during editing. We have attempted to identify those changed sections with reference to an earlier version and highlight these so that they can be identified. Some additional edits have been made to this section of PDZ5 anyway, with track changes showing for these.	PDZ5, Truro upper basin	Noted - satisfied.		Thomas Schindl pp Nikki Horns	05-Nov-10
41.1	Showstopper	23-Apr-10	Environmental	SEA/AA	Main Report, Chapter 4 PDZ 5; SEA Sections 4.2.27 & 5.2; HRA Sections 5.3.2, 5.3.12-20 7 Appendix C5	Policies of HTL within or adjacent to the Fal and Helford SAC will result in coastal squeeze and the loss in extent of intertidal habitat from within the SAC. MR policies identified within the estuary system (PDZ 5) will allow for the creation of new intertidal habitats adjacent to the SAC to offset the loss of this habitat. The reasoning for the various policies is clear and justified, however this proposed new habitat is outside the SAC boundaries can not be considered as mitigation for the loss of habitats inside the SAC. Only measures taken inside the SAC boundary can be considered as mitigation.  If appropriate measures can not be identified inside the site boundaries, then it has to be addressed by appropriate compensation measures outside of the SAC. Compensation measures can only be considered once the policies resulting in the impact on the SAC have been subject to the further tests of IROPI/Alternatives under the Habs Regs.  If appropriate mitigation can not be identified within the SAC then the HRA must conclude adverse effect on integrity or 'can not conclude no adverse effect on integrity' The mechanism to co-ordinate and deliver the MR habitat compensation sites should be identified, it is unclear whether this will be delivered by the EA RHCP, Cornwall Council or another body. This also impacts on the SEA conclusion that the SMP policies will not result in major impacts to Natura 2000 sites.	Can the team clarify whether the new habitat proposed is mitigation or compensation under the Habs Regs? If compensation as outside the boundary of the SAC, then the conclusions of the PDZ, HRA, SEA should be amended to reflect this to 'can not conclude no adverse effect on integrity' of Fal and Helford SAC. Further work will be required to support Alternative/IROPI tests, which if successful will allow MR sites to be considered as compensation for coastal squeeze impacts. A mechanism to co-ordinate the deliver of MR sites/habitat compensation should be identified - EA RHCP?	Review of Draft	Nikki Horns	16-Aug-10	Section revised with regard to impacts on intertidal - subsequent work has considered the impacts of SLR and determined that NAEOL can be determined here.	Appendix I	QRG Review continues on next line in column G			
41.2		08-Sep-10				Still concerned that the issue of mitigation vs compensation is not adequately addressed. For instance in the PDZ page 35 for the AA summary, there is a claim that overall the MR actions will provide 14.05 ha for intertidal habitat to migrate to. That is fine, however, as per Nikki's comments, is this compensation or mitigation? Is the area where the intertidal habitat is to be created also designated SAC? If so, what is the habitat type that will be replaced? Has consideration been given to the loss of this habitat, and the need to potentially compensate for its loss? How is this being assessed/taken into account by the AA?  However, if the area where the intertidal is to be created is not SAC, then this is compensation and not mitigation as per Nikki's email. Maybe this can be clarified in section 6.2.1 of the HRA report, as currently it is unclear to me if the intertidal habitat created is in SAC or outside of the SAC boundary? This would apply for the other PDZs as well.	Please respond to the comments raised by response on this review sheet, and consider what changes may be required to the documents as a result.	Review of Resubmission	Thomas Schindl pp Nikki Horns	26-Oct-10	MR realignment takes place prior to any impact occurring on the Natura 2000 sites (particularly for the Fal and Helford). The MR provides space for intertidal habitat expansion, but it is necessary to examine in detail any specific location of MR to discuss the findings. MR may be required to prevent impacts on European Sites (for example by removal of landfill material prior to natural coastal erosion/procession). However, at Truro the detailed findings (and discussion with numerous parties including EA and Natural England) concluded that the policies within the PDZ did not adversely affect the integrity of the SAC, this included the very rare number of locations where HTL occurred, as well as the locations where MR occurred. MR was not presented as providing mitigation or compensation, the MR locations within the estuary are intended to provide additional space for intertidal habitat creation, which may or may not be constrained by natural topography elsewhere, and the intent of MR is to provide the habitat before such habitat is lost. The revised HRA will have clarified this in Annex I (Appendix C and Section 5.3). Consequently, it is confirmed that MR is not co	HRA Annex I (Appendix C and Section 5.3).	Noted. Thank you very much for the clarification/explanation. Satisfied.		Thomas Schindl pp Nikki Horns	05-Nov-10
42		23-Apr-10	Environmental	SEA/AA	SEA Section 4.2.24-29	HTL policies in the Upper and Lower Fal should also reflect impacts to SSSIs present in estuary including loss due to coastal squeeze.	Team to consider additional text on impacts to SSSI due to HTL policies.	Review of Draft	Nikki Horns	25-Aug-10	The locations of NAI provide the greatest influence to the intertidal habitats, and where HTL or MR occur the assessment (combined with HRA assessment) indicates that there will be no adverse impact and likely to be benefits due to even greater area of intertidal habitats that MR creates.	No edits or additions necessary.	Satisfied		Thomas Schindl pp Nikki Horns	08-Sep-10
43		23-Apr-10	Environmental	SEA/AA	SEA Section 4.2.58	Question conclusions for PDZ 10, that the impacts to environmental designations are indeterminable. HTL policies in the Hayle Estuary will result in coastal squeeze to SSSI habitats.	Can the team provide further justification for their conclusions and consider the appropriateness of the policy option choice?	Review of Draft	Nikki Horns	25-Aug-10	SoEP para 3.1.77 revised to clarify the assessment	SoEP 3.1.77	Satisfied		Thomas Schindl pp Nikki Horns	08-Sep-10
44	Showstopper	23-Apr-10	Environmental	SEA/AA	Section 2.3 and Appendix I	The plan concludes the need for a "Statement of Case" for Defra consideration, but it is not set out in this way. It is important that the plan is sufficiently robust on this matter, and on the links with the EA's Regional Habitats Creation Programme to be supplied also to Defra.	Can the team please clarify the "Statement of Case" requirements, its role within the HRA and the importance of the EA's RHCP and ensure that the various chapters that deal with this are sufficiently cross referenced.	Review of Draft	Jim Hutchison	16-Aug-10	Additional works have confirmed no need for IROPI and that no Statement of Case will be required.	Appendix I	Satisfied		Jim Hutchison	08-Sep-10
45.1		23-Apr-10				<u>Draft Status of the Environmental Report:</u> Why is this document labelled 'Draft'? If out to consultation, it should be the final and cannot be revised beyond the point of publication. All change or addition must be in the form of Addenda - otherwise, it may be included in the Statement of Particulars but only if it constitutes addition to a sound basic assessment.	Explanation of the 'draft' status of ER and timescale for completing final version and providing it for consultation.	Review of Draft	Liz Galloway	25-Aug-10	Noted. The 'draft status' of the ER is line with status of the 'draft SMP' until it is adopted as such.	See SoEP.	QRG Review continues on next line in column G			

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45.2	Showstopper	08-Sep-10	Environmental	SEA/AA	Throughout	<p>The answer does not convince me that the process is understood. ER published with draft plan should have been final.</p> <p>Furthermore, the draft statement of environmental particulars refers to itself as an addendum to the ER (para. 1.3) and reports the reasons for producing it as relating to changes since the ER was published. The statement of particulars is a separate requirement under the regulations and this should also be cited as one of the key reasons for producing it.</p> <p>One of the functions of the SoEP is to clarify how they have responded to consultee comments and concerns. Currently, the document doesn't do this - only generally states that changes are partly in response to consultees comments. A more transparent approach would be helpful.</p>	<p>Please revise the text of section 1.3 in the statement of environmental particulars.</p> <p>Please provide a more transparent approach to addressing issues raised by consultees.</p>	Review of Resubmission	Karl Fuller pp Liz Galloway	26-Oct-10	<p>Section 1 of the SoEP has been revised to ensure greater clarity in respect of the consultation process, along with responses examined in Section 6 and Appendix 3. The section describes and presents the SMP process (and the resulting link with consultation) whilst Section 6 summarises the responses received and how they have been taken into account, and Appendix 3 presents the responses received and the amendments or changes to the documents that have resulted.</p>	SoEP - Section 1 & 6, plus Appendix 3	QRG Review continues on next line in column G			
45.3		05-Nov-10				<p>There is no section 6 in the copy of the SoEP supplied. As a result there is still no commentary on how the consultee responses have been taken into account.</p>	<p>Please provide a copy of the SoEP with section 6 included.</p>	Review of Resubmission	Karl Fuller pp Liz Galloway		<p>Section 6 has been included, though previously consultation responses were referred to (and their location referred to), summary of the responses received and actions implemented have been added to the SoEP.</p>	SoEP Section 6.				
46		23-Apr-10	Environmental	Sustainability	Main Report PDZ4, Page 16	<p>There are some sites [including this one] where landfill is an issue. The plan does not explain if the relevant authority [presumably the County Council] has a policy for dealing with landfill.</p>	<p>Can the team please clarify and set out any implications in the document?</p>	Review of Draft	Jim Hutchison	25-Aug-10	<p>The presence of landfill as an action at specific locations has been highlighted in the Action Plan.</p>	Chapter 6 action plan	<p>I note the inclusion of the need to investigate landfill risks in the PU summaries and investigations in the Action Plan. The implications for the plan would appear to be that the policy options will be subject to the outcomes of these investigations. Satisfied.</p>	Steve Jenkinson pp. Jim Hutchison	08-Sep-10	
47		23-Apr-10	Economic	Affordability	Appendix H	<p>Where the economic benefit cost ratio (BCR) is relatively low, say &lt;3:1, or 2:1 for example, can the team please confirm that they have selected a policy option that can be implemented.</p> <p>Also, where BCRs are less than unity, or zero, the plan states that public funding might not be available. Surely the current position on this is clearer than is suggested in this Appendix?</p>	<p>Can the team please explain that, where a low BCR has been selected, the preferred policy can be implemented? [Some clarity on the messages made here is required.]</p> <p>Can the team please clarify the low BCRs with respect to future funding?</p>	Review of Draft	Jim Hutchison	16-Aug-10	<p>New section added to Appendix H "H6 Affordability and commitment intent</p> <p>The aim of the economic analysis is to determine through a broad brush approach to what degree the preferred policy may be justified in economic terms relating to coast protection or sea defence. In many cases the benefit/cost ratio generated through the assessment is very low, with only a few MAs showing a robust benefit/cost ratio. Although the presence of a robust benefit/cost ratio does not mean that funding from the public purse will be necessarily be available, clearly a very low ratio makes public funding highly unlikely.</p> <p>Where there are known benefits which are not considered within the analysis but which are clearly factors that would need to be considered in future, more detailed economic analysis, these are stated in the notes presented in Annex H1. These factors include properties at risk of flooding from wave action, road and transport assets and environmental assets such as listed buildings and amenity sites.</p> <p>The Client Steering Group (CSG) has considered the results of the economic assessment of the Preferred Plan. Following this consideration the Preferred Plan has not been altered due to concerns over the benefit/cost ratios generated.</p> <p>The CSG have approved the Action Plan based on the Preferred Plan. The Action Plan lists the identified measures necessary to implement the intent of management identified by the Preferred Plan. It identifies partners and sources of funding as well as prioritising the actions into Low, Medium and High priorities. Through signing up to the Action Plan, each partner is demonstrating a commitment of intent to undertaking each action, as priorities allow and funding permits.</p> <p>Shoreline management planning is a continuous process. The SMP2 recommends that further detailed economic analysis will need to be undertaken in justifying any specific scheme in line with the principles set out in the FCDPAG series of guidance. "</p>	Appendix H, H6	<p>Satisfied. It is noted that the CSG consider that the public and other stakeholders will sufficiently understand the conclusions of the plan on affordability. It is hoped that these messages are regularly reported when opportunities arise.</p>	Jim Hutchison	08-Sep-10	
					<p>There is a statement that BCR is less than unity, but the note suggests that traffic and other losses will make the unit affordable. What if it didn't or if the BCR</p>						<p>Text added "H6 Affordability and commitment intent</p> <p>The aim of the economic analysis is to determine through a broad brush approach to what degree the preferred policy may be justified in economic terms relating to coast protection or sea defence. In many cases the benefit/cost ratio generated through the assessment is very low, with only a few MAs showing a robust benefit/cost ratio. Although the presence of a robust benefit/cost ratio does not mean that funding from the public purse will be necessarily be available, clearly a very low ratio makes public funding highly unlikely.</p> <p>Where there are known benefits which are not considered within the analysis but which are clearly factors that would need to be considered in future, more detailed economic analysis, these are stated in the notes presented in Annex H1. These factors include properties at risk of flooding from wave action, road and transport assets and environmental assets such as listed buildings and amenity sites.</p>	Appendix H, H6				

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48.1		23-Apr-10	Economic	Affordability	Main Report Ch.4 PDZ2, PDZ3, PDZ7; Appendix H	remains very low and funding was unlikely as a consequence - what is the plan suggesting under such a scenario? [JH]  I am concerned at the messages which are implied by some of the commentary in the PDZ summaries. For example, PDZ7 p.17 PU 17.4 notes economic justification likely. The overall B/C ratio drawn from App. H is 1.16 to 1, and there is no footnote to explain that economic justification does not translate into likelihood of funding. Further, App.H PDZ3 (MA7) includes a note that public funding is unlikely, but I cannot see this note drawn forward to the PDZ summary. Finally, PDZ2 PUs 4.2 to 4.4 includes the comment "Meet socio-economic and historic objectives", but this does not appear to be supported by the preferred plan B/C ratio of 0.69 to 1. There may well be other similar examples. [SJ]	Can the team clarify if they are content with the messages set out here [and in other PDZs as well, e.g. PDZ5] and what the plan should say in terms of a no funding scenario? [JH]  Could the Project Team consider further whether the messages being conveyed are accurate, and adequately reflect the risks associated with future funding? Should there be clearer direction on then need to consider alternative funding sources given the number of private (commercial) interests in some areas? [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	16-Aug-10	The Client Steering Group (CSG) has considered the results of the economic assessment of the Preferred Plan. Following this consideration the Preferred Plan has not been altered due to concerns over the benefit/cost ratios generated.  The CSG have approved the Action Plan based on the Preferred Plan. The Action Plan lists the identified measures necessary to implement the intent of management identified by the Preferred Plan. It identifies partners and sources of funding as well as prioritising the actions into Low, Medium and High priorities. Through signing up to the Action Plan, each CSG partner is demonstrating a commitment of intent to undertaking each action, as priorities allow and funding permits.		QRG Review continues on next line in column G			
48.2						The additional text at Sect. H6 is helpful as it flags the risk of lack of public funding for PUs with low B/C ratios, and also sets out the CSG response to the economic assessment (although 2nd sentence para. 3 is ambiguous – reword?). The CSG approach appears to be to assume that funding sources will be found to support the proposed policy options in all cases? If so there is a risk that stakeholders will assume delivery of the preferred policy options and not consider the implications of non-delivery (ie. change of policy option). [SJ]  Satisfied (JH)	Can the Project Team confirm that it will keep stakeholders informed of progress with respect to implementation and funding? This will be important to ensure that maximum lead-in time is provided in situations where funding cannot for some reason be secured and a change of policy option is required as a result.	Review of Resubmission	Steve Jenkinson	26-Oct-10	Yes there will be regular yearly updates via CISCAG and reports to the South West Coastal Group. There will also be an SMP wide action to provide updates locally to all stakeholders upon the commencement and the completion of any studies etc which may lead to works so that funding options can be discussed / identified as appropriate. Updates and completed further studies would all be made available to stakeholders / communities via the CISCAG website. N.B. The CSG have also attempted to get some clarification on this issue from the NQRG team directly but were unable to do so at the time of submission.	Action Plan. SMP wide actions.	Your response on this review sheet provides reassurance that ongoing communications with stakeholders will be undertaken – this will be important to help manage expectations. However, I did not see an SMP wide action in the Action Plan that covered this? (see also item 66 below). Subject to the CSG ensuring that appropriate actions are included in the Action Plan then satisfied.	Steve Jenkinson	05-Nov-10	
49		23-Apr-10	Economic	Affordability	Main Report Ch.4 PDZ8 MA22	The Plan notes that there is a very low B/C ratio, and that alternative funding is likely as the harbour performs more than simply a flood defence function.	Could the Project Team advise whether the harbour owners have indicated support for the proposed policy options, and whether discussions re funding have been held or are planned?	Review of Draft	Steve Jenkinson	16-Aug-10	The CSG have not held specific discussions with any potential funding provider. The text added in H6 discusses affordability, commitment intent and wider funding sources. This advises that funding for all actions are investigated further as the Action Plan is implemented. With regards to this particular harbour a SMP wide action has been included in the Action plan to assess the role of breakwaters in providing a sea defence and coast protection role.	No change	Satisfied on this issue, but please see my response to item 48 above	Steve Jenkinson	08-Sep-10	
50		23-Apr-10	Economic	Affordability	Main Report Ch.4; Appendix H	The economics are presented for groups of policy units. This makes it difficult to determine the economic viability of policies for individual policy units. [AP]  The economic assessment has been undertaken, or at least presented, at Management Area level. It is not clear how the SMP flags any issues with regard to economic viability and affordability at policy unit level. For example, PDZ1 MA03, PDZ2 MA04 both have a benefit cost ratio well below 1 to 1, but there are several Policy Units with do-something preferred policy options in these MAs. [SJ]	Consider adding a summary table to Appendix H giving the economic case by policy unit. [AP]  Could the Project Team explain how the SMP communicates any potential funding risks for individual Policy Units? Also, how can we tell if these risks have been translated into actions in the Action Plan? [SJ]	Review of Draft	Andy Parsons Steve Jenkinson	16-Aug-10	The economic analysis has been undertaken on a management area basis, as agreed with the CSG. Damages have been determined on a MA basis which means that the economic case by policy unit is not possible without a re-assessment of the damages. Undertaking the analysis at a MA level allows consideration of the preferred plan within the context of the intent of management for each management area. Minor text added in H1 to now state "The aim of the current review is to determine to what degree the intent of management proposed through the preferred policy may be justified in economic terms relating to coast protection or sea defence."  In addition the review aims to examine the nature of the economic justification; considering whether that justification lies strongly with the defence of clear direct benefits, in terms of direct flood or erosion risk to assets, or derives from associated damages such as amenity, recreation, traffic disruption or is driven by the aims of other plans." It would be possible to reassess the economics at a PU level, with support from the CSG for spending more time on this exercise. It should be noted that due to the large number of relatively small communities present, this could become a too detailed exercise which is beyond the broad-brush approach within the SMP guidance.	Appendix H. H1	Satisfied (SJ)  Comments noted. Economics at MA level have limited links to specific scheme viability, but approach reflects nature of coast. My view is that more detailed analysis is no warranted at this stage. Satisfied [AP]	Andy Parsons Steve Jenkinson	08-Sep-10	
51	Showstopper	23-Apr-10	Economic	Affordability	Main Report Ch.5, PDZ1	There are some locations where H1L is set out for reasons other than coastal erosion or sea flooding, e.g. heritage reasons, for example in PDZ1 and PDZ5 and 6.	Can the team please clarify how the funding for such policy options will work and that any actions for such will be set out in the Action Plan with funding commitments clearly indicated. [I assume if the specific funding organisations cannot commit to such funding then the policy option will need to be reconsidered for the final version of the report?]	Review of Draft	Jim Hutchison	16-Aug-10	The text added in H6 and at the start of Chapter 6 explains the intent of commitment from organisations that are on the CSG and have signed up to the action plan.	H6 and Chapter 6	Satisfied	Jim Hutchison	08-Sep-10	
52		23-Apr-10	Economic	Data and Mapping	Appendix H	It is important that as much relevant data as possible is presented in a usable form, partly to provide an audit trail for the policy option choices and partly to inform high level reporting eg. national summaries. There is useful cost data and properties at risk data provided in this appendix. The text also notes however that a number of high level assumptions have been made with respect to existing defences and managed realignment.	Could the Project Team please clarify whether the data that supports these assumptions are also available or set out elsewhere in the document? Also, what Optimism Bias rate or rates have been used?	Review of Draft	Steve Jenkinson	16-Aug-10	Information setting out assumptions and methods is provided in Appendix H, which is now enhanced. Properties at risk of flooding and erosion are set out in Annex H1, as are the total costs at the location(s) where investment is planned under the preferred plan. The SMP guideline costs are set out in Appendix H. Information on type and length of defence is within the defences shapefile supplied in the GIS Viewer. We have incorporated optimism bias in the economics sensitivity assessment now added to Annex H1.	Appendix H including Annex H1	Satisfied	Steve Jenkinson	08-Sep-10	

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53		23-Apr-10	Economic	Data Issues	Appendix H	There is no apparent use of the MDSF tool? Also, if specific strategies have been used, a summary table of these, together with the approval status would be useful.  Where there are heritage and other assets still to be valued, the plan should set out how this data can be obtained, including which organisation is best placed to do it, and what funding should be targeted. [This data should be transferred to the Action Plan.]	Can the team please clarify the use of the MDSF tool. Any data on detailed strategies would be useful, including status.  Also, please clarify what actions will be included in the Action Plan to gather outstanding data.	Review of Draft	Jim Hutchison	16-Aug-10	MDSF has not been used to generate damages. This is due to time constraints on processing MDSF and linking with agreed NPD information. The PMG agreed it was less risk to the programme and budget to use a simple methodology prepared for the SMP by Dr J Chatterton with immediate outputs, rather than use MDSF which was started, but was proving very time consuming with low confidence levels in the outputs. There are no strategies in the study area available from which to draw upon. This is covered in Chapter 1.3.1 and H2. Text expanded in H3 as follows "H3 Generation of new data Determination of Damages  Damages have been determined based on the risk of flooding and or erosion to properties over the three epochs required for SMP2 using a 'damage assessment' technique prepared by Dr John Chatterton. Numbers of properties at risk have been determined by comparing the National Property Dataset against the maximum flood and erosion extents assuming No Active Intervention. A number of broad assumptions, drawn from the Multi-Coloured Manual and Land Registry have been made to determine commercial and residential average annual damages in May 2009 as follows;  • No Existing Protection • May 2009 Price base unless otherwise stated • Once a property is lost through erosion then Annual Average Damages no longer apply, with £175,549 been used as an average value for residential property loss based on Land Registry information • Depth of flooding is taken into account based upon scale of flood • National Property dataset values used for non-residential property  Sea level rise has been considered in the production of the flood and erosion extents and therefore is taken into account in the damage assessment. The approach for generating the flood and erosion extents is discussed in Chapter 3. "	Appendix H3	Satisfied (see above comment)		Jim Hutchison	08-Sep-10
54.1		23-Apr-10				Two policy units in MA12 include HIL/MR policy options. Likewise MA18 PU 18.3. Without reading the supporting text it is unclear if this is two possible policy options, to be resolved through further studies, or frontages with part HIL and part MR.	Could the Project Team confirm that this represents frontages with part HIL and part MR? If so, it would be less ambiguous to use "HIL with localised MR" or similar, in line with other SMPs. This approach would need to be applied consistently through the SMP.	Review of Draft	Steve Jenkinson	16-Aug-10	The use of HIL/MR can reflect uncertainty in the actual requirements for management and it may be that ultimately we are looking at MR with localised HIL, so it may not be consistent in every case. It may also reflect an intent to be flexible in response to rising sea levels through a particular epoch (i.e to be able to move to MR before the next epoch begins if rate of rise exceeds anticipated rates). The team acknowledges the intent of any HIL/MR insertions need to be explained within the detailed discussions (text to be reviewed)	No changes	QRG Review continues on next line in column G			
54.2		08-Sep-10	Economic	Decision Making	Main Report Ch.4 PDZ5 MA12 PDZ7 MA18	This is a useful clarification.	Could the Project Team advise if this is included in the document? If not it would be helpful to add. Also, the response notes that HIL/MR needs to be explained, text to be reviewed, but then notes "No changes". Please clarify.	Review of Resubmission	Steve Jenkinson	26-Oct-10	Project team agree that use of "HTL with localised managed realignment" should replace HIL/MR (or vice versa) in most instances. This instantly provides a better overview of the management intent and provides reassurance to the community of the main intent. These changes have been made as appropriate throughout the document. There are a few locations where future epoch 2 / 3 policy is very conditional on a particular study or strategy taking place and these are noted in the text, e.g. at Coverack where a geotech study is required to provide guidance on refining the epoch 2 / 3 policy of HIL/MR. However even at this location it is explained that HIL is the default position and MR will only be invoked if the study demonstrates its viability / necessity.	changes throughout PDZ documents and carried through to supporting appendices where necessary	Satisfied		Steve Jenkinson	05-Nov-10
55		23-Apr-10	Economic	Risks and Impacts	Main Report p5	The report notes that funding may not be available from the FCRM budget for HIL policy options. This is an important caveat to make, but should not be restricted to HIL.	Could the Project Team add a further comment, perhaps in Sect 1.1.1, to note the funding uncertainty relating to all proposed activities which are expected to draw on public funding?	Review of Draft	Steve Jenkinson	16-Aug-10	Text removed from the HIL policy statement and added and amended below in a policy option funding paragraph as follows "Policy option funding In areas where a management intervention has been recommended, it is possible that funding may not be forthcoming from the Defra Flood and Coastal Erosion Risk Management (FCERM) budget. The SMP has highlighted this and also identified what additional opportunities and benefits may be gained from the policy option. Caveats are made in these circumstances highlighting the need for collaborative funding to achieve the proposed management plan. This is discussed further in Chapter 6 and Appendix H."	Chapter 1	Satisfied		Steve Jenkinson	08-Sep-10
56		23-Apr-10	Economic	Sensitivity	Appendix H	The discussion on sensitivity here is in my view very limited and not particularly informative, and the reference to "discussed in the main text" not that helpful. Whilst I think there is a challenge in undertaking meaningful sensitivity analysis as part of a broad-brush economic assessment, I feel that there could have been more here on the range of key variables that might impact on preferred policy options. There are likely to be a number of generic variables (erosion rates, flood areas, residual defence life etc), along with some uncertainties that are specific to individual areas.	Could the Project Team consider re-working this section to explain more clearly what the significant economic uncertainties are, their potential impacts and how they have been or will be dealt with?	Review of Draft	Steve Jenkinson	16-Aug-10	Text added "Much uncertainty is related to the cost of implementing the preferred plan. While it is generally not within the remit of the SMP to define specific works (rather it sets the general intent and agenda for management), a high level sensitivity assessment has been undertaken on the costs in order to identify the impact on the benefit cost ratio. This sensitivity assessment includes adding a 60 per cent optimism bias on the present value cost, included for completeness and as a requirement to consider the guidance provided by the Treasury's 'Green Book'. It is important to acknowledge however that the greatest uncertainty is often the type of work that would actually be carried out under a given policy scenario. The results of the sensitivity assessment are included within Annex H1."	App H and Annex H1	Satisfied		Steve Jenkinson	08-Sep-10
57	Showstopper	23-Apr-10	Economic	Sustainability	Main Report Ch. 4 PDZ18 loS	Would like to see the outcome of the economic review and the teams view on longer term sustainability given possible sea level rise, and increased storminess. [There may be other reasons to maintain defences, but not using public funding? If so, can the team please explain?] [JH]  The report notes that the high-level intent for Scilly should support the adaptation of communities to changing coastal conditions, and flags the need for long-term strategies for adaptation of the populated areas, particularly at Hugh Town. [SJ]	Can the team please briefly set out its findings here? [JH]  Could the Project Team clarify what actions will be included in the Action Plan to promote these strategies? Is there an issue with regard to the general sustainability of the islands, and if so has collaboration with other bodies been considered to deliver a multi-agency strategy? [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	16-Aug-10	Isles of Scilly FCRM Strategy discussed in PDZ18 and included within the Action Plan, now supplied in Chapter 6.	PDZ18 and chapter 6	Satisfied		Steve Jenkinson Jim Hutchison	08-Sep-10
58		23-Apr-10	Administrative	Affordability	Main Report Ch.5	There appears to be a limited number of locations where the preferred approach is to HIL, in between a majority of NAI. This should allow the CSG to prioritise which location are of key importance over the next 5 years, but it was not easy to find any text on this in the plan.	Can the team please explain which locations are a priority in the next 5 years and where this is summarised in the plan?	Review of Draft	Jim Hutchison	16-Aug-10	Yes there are some clear priority areas which have emerged from the SMP Review. These are Hugh Town, St Mary's, Mounts Bay (Marazion to Newlyn frontage, incl. Marazion Marsh); Fal Estuary; Praa Sands; Hayle; Perranporth; Downberry to Seaton; Mevagissey; Looe; Pentewan; Coverack; Portreath; Loe Bar. A summary of these will be provided in Chapter 5.	Chapter 5, pp7	Satisfied		Jim Hutchison	08-Sep-10
59		23-Apr-10	Administrative	Decision Making	Main Report Ch. 4. PDZ 4. 6D-3	Portscatho to St. Anthony's Head - why no policy?	Can the team clarify if there should there be an entry in this cell?	Review of Draft	Liz Galloway	16-Aug-10	Not entirely sure what part of document this comment refers to - Portscatho to St Anthony Head is all part of policy unit 10.1 which has a NAI policy through all epochs as it is all open undefended coast	No changes	Satisfied		Karl Fuller pp Liz Galloway	08-Sep-10

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60		23-Apr-10	Administrative	Decision Making	Main Report Ch.5, MA 16, 19 and 23, as 3 examples only.	In this unit, the SMP1 indicated a HIL policy option, but SMP2 suggests NAI but its not clear why, and those affected by this change may need some clarity. [Same is needed where we have a change from a positive option to a NAI policy option.]	Can the team please explain and confirm that all such changes are clearly set out in the plan?	Review of Draft	Jim Hutchison	16-Aug-10	Wherever change from SMP1 HTL toSMP2 NAI (or MR) has occurred, the reasons for the change are provided as an integral part of the detailed discussion in Chapter 4. The rationale for the policy provided in the comment box in Chapter 5 should also provide indication of why a change from SMP1 policy may have occurred. For the examples given, MA16 is heavily influenced by National Trust Policy on allowing natural processes to occur which has meant necessary change away from HTL. At MA19 (PU19.2) the change is from HTL/Do nothing to NAI but the requirement to provide transition (and hence the change of policy) is referenced. For MA23 (PU23.2) the justification is given clearly as to why there is no economic or technical reason for public funding of defence, in itself this provides a reason for the change of policy.	No changes	Satisfied		Jim Hutchison	08-Sep-10
61		23-Apr-10	Administrative	Engagement	General	The draft SMP provided on CD included a range of mapping accessed through the associated GIS viewer. [SJ] Will there be separate advice prepared to users of the plan on how to use the "software viewer" system? Who is the intended audience? Will the public be able to use it? [JH]	Could the Project Team clarify: - whether all mapping provided on GIS is or will be provided in "hard copy" (for example .pdf) as well? - if it intends providing the GIS viewer and data on the website or making it available on CD? [SJ] Can we make the intended use of this "tool" clearer? [JH]	Review of Draft	Steve Jenkinson Jim Hutchison	16-Aug-10	Please see response given in the box below which applies to this comment. In addition, clarification text has been added to Appendix k Section 1.1. Section 1.1.2 of chapter 1 already states that the GIS viewer is provided to the operating authorities on CD.	Appendix K	Satisfied		Steve Jenkinson Jim Hutchison	08-Sep-10
62	Shows topper	23-Apr-10	Administrative	Risks and Impacts	Policy Unit mapping	The policy mapping does not give any indications of erosion risks in the NAI policy units and does not show flood risk areas. The mapping supporting the main SMP document needs to have this information so that the broad scale risks associated with eroding and flooding under the preferred plan is readily accessible. [AP] There does not appear to be a consistent and complete presentation of NAI baseline mapping for the complete coastline. Some of the inset maps in the PDZ summaries include NAI lines and 1 in 200 yr flood extents for 2105, but only at selected locations? [SJ]	The team should consider adding flood map overlay to final policy maps and adding info on erosion risks to NAI frontages. [AP] Could the Project Team clarify the approach to NAI Baseline mapping – does this reside in full only in the GIS? [SJ]	Review of Draft	Andy Parsons Steve Jenkinson	16-Aug-10	Detailed discussions with the CSG have been held throughout the study with regards to the best method to present the erosion and flood mapping produced by the SMP, and following receipt of NQRG comments. Due to the length of coastline (especially with much showing little change) and concerns over volume and clarity of mapping the CSG determined that the GIS Viewer is the route for the operating authorities to receive the full dataset of erosion and flood data. It is acknowledged that the GIS Viewer is not available to the public and wider users. It is for this reason that Chapter 4 provides extracts of this mapping on a location by location basis in order to illustrate NAI flood and erosion risks, with the chapter 4 supporting text in order to contextualise and qualify the information shown in the mapping extract.  Providing the data to the public via the CISCAG website has also been dismissed by the CSG based concerns over the public misunderstanding the data. Operating authorities (EA and Cornwall Council) have reported that they are happy to allow members of the public to view the GIS viewer at their offices, or supply selected extracts of mapping if requested. The sharing of this data with the public therefore follows the approach being adopted by the NCERM project with regards to the public viewing lines of maps with LA officers on hand to explain the data.	no change	Helpful clarification – satisfied. [SJ]  Noted that the flood and erosion risk areas are mapped in Chapter 4. Still feel that the Policy Mapping in Chapter 5 should show the flood and erosion residual risks. However, provided that the CSG are content with approach adopted and they consider they will be able to communicate the residual risks to 3rd parties then satisfied [AP].		Andy Parsons Steve Jenkinson	08-Sep-10
63		23-Apr-10	Action Plan	Coastal Processes	Appendix C	The report highlights that there are gaps in the data and information locations around the coast not covered by detailed scheme specific studies.	Can the team confirm that the Action Plan will make reference to the data needs ahead of any review of the plan or SMP3?	Review of Draft	Karen Thomas	16-Aug-10	The action plan makes reference to data needs at each policy unit where relevant eg monitoring of erosion rates, and also on a SMP wide basis for wider ranging data needs. An example of this is the need to quantify wave action risks along the coastline and to digitise and orthorectify all the 1947 aerial photography held by Cornwall Council.		Satisfied		Karen Thomas	08-Sep-10
64		23-Apr-10	Action Plan	Engagement	General	Successful implementation of the Plan is likely to require the support of other bodies.	Could the Project Team comment on any Policy Units where third party support is going to be required, and what level of support has been indicated to date?	Review of Draft	Steve Jenkinson	16-Aug-10	The action plan presents where support is required for each action within the Partners column. Introductory text to the action plan states that "The CSG have approved the Action Plan based on the Preferred Plan. The Action Plan lists the identified measures necessary to implement the intent of management identified by the Preferred Plan. It identifies partners and sources of funding as well as prioritising the actions into Low, Medium and High priorities. Through signing up to the Action Plan, each CSG partner is demonstrating a commitment of intent to undertaking each action, as priorities allow and funding permits.  A wide range of sources of funding have been considered in drawing up the Action Plan, which include Environment Agency Flood and Coastal Risk Management funding, Defra Grant in Aid funding, Plymouth Coastal Observatory, Nation Trust, English Heritage, and landowners such as private developers, the Duchy of Cornwall and Wildlife Trust. While the Action Plan does not commit these organisations to providing funding, it does document the wide range of interests that could be involved with investing in the sustainable management of the coastline. Furthermore the potential sources of funding listed in the Action Plan are not exhaustive. All funding routes should be investigated further as the Action Plan is implemented. "		Comments noted – satisfied. Presumably not all of the partners identified in the Action Plan will have signed up to the plan as they are not CSG partners? May be worth clarifying.		Steve Jenkinson	08-Sep-10
65		23-Apr-10	Action Plan	Engagement	Main Report Ch.4 PDZ3 p.16	Notes that Par and Par Docs should be identified as "Coastal Change Management Areas" (CCMA), but does not explain why.	Could the Project Team clarify whether CCMA's are explained elsewhere in the documents, or add additional text here, so that readers understand the significance of this? Have similar flags regarding CCMA's been added throughout the PDZ discussions for appropriate areas (eg. PDZ1 Mevagissey)? Also, have actions been included in the Action Plan to ensure that this is considered within spatial planning?	Review of Draft	Steve Jenkinson	16-Aug-10	Information on CCMA's added to planning links section in Chapter 3. CCMA ref from Par docks removed. CCMA flags added to PDZ discussions and included in Action Plan.	3.4.1 and chapter 6	Satisfied		Steve Jenkinson	08-Sep-10

Item Number	Showstopper	Date Matter raised	Criteria Heading	Criteria sub heading	Document Reference	Comment	Action Required	Timing of Comment	Comment provided by:	Date Response Provided	Response	Section Amended (New para nos and Table nos used in this column)	Review of Response	Action Required	Comment provided by:	Date comment provided
66.1		23-Apr-10				<p>There is no draft Action Plan with the consultation version. [JH]</p> <p>There is no indicative or provisional Action Plan included in this consultation draft. [SJ]</p>	<p>Can the team please clarify when this report might be available for the QRG? [JH]</p> <p>Could the Project Team comment on the proposed process for drafting, agreeing and consulting upon the Action Plan? Also that the Action Plan will include inter alia:                      - lead responsibilities, timetables for actions, approximate costs and indicative funding sources, links to the MTP?                      - a process for incorporating revised data, guidance or policies?                      - a process for monitoring progress with actions and success criteria?                      - links to CLG National Indicator 189?                      - ongoing communication activities including web management ? [SJ]</p>	Review of Draft	Jim Hutchison Steve Jenkinson	16-Aug-10	<p>The Action Plan has been produced as part of the Stage 5 tasks according to the CSG approved Action Plan template. This covers Action, timescale, objectives, monitoring indicators, partners, priority and funding. The action plan has been produced with key members of the CSG including the 3 Cornwall Council principal engineers and the EA. Upon drafting, the draft action plan was then circulated to the whole CSG group. Any comments received have been incorporated. It is now supplied for NQRG review in Chapter 6 of the SMP.</p>		QRG Review continues on next line in column G			
66.2		06-Sep-10	Action Plan	Monitor/Review	Main Report Ch.6	<p>Following receipt of the Action Plan could the Project Team comment on the following:                      a) the AP indicates priorities for actions but there are no indicative timescales.                      b) no SMP wide actions dealing with for example ongoing communication (eg. web management), developing links with spatial planning, dealing with new data (change process) and changes to Government policy, supporting contingency planning? [SJ]</p> <p>Satisfied (JH)</p>	<p>Could the Project Team please comment and consider the need for additions to the Action Plan? [SJ]</p>	Review of Resubmission	Steve Jenkinson	26-Oct-10	<p>The action plan does include an indicative timescale column to identify short, medium, long term etc. More specific short term indication (e.g. by 2015, by 2025 etc etc) could be added to this column if required although the CSG have indicated they are uncomfortable with providing specific dates by which to achieve certain actions, particularly given the current uncertainty in funding availability and upcoming spending review. Further SMP wide actions have been added to support the links to planning, although these are given comprehensively through the Action Plan document at the policy unit level (and this is seen to be more useful for actual local delivery)</p>	Action Plan - SMP wide actions.	<p>Re timescales I understand the concern re committing to dates, but short-term, for example, could be anything from next year to 10 years time. It is for the CSG to consider how best to manage delivery of the various activities but I suggest you do need to ensure that any urgent activities do not slip as a result of not being clearly flagged as such.                      With regard to the SMP wide actions that I suggested I have no problem with these being dealt with more locally at PU level as long as they are included where appropriate. Provided that these comments are taken on board then satisfied. [SJ]</p>	Jim Hutchison Steve Jenkinson	05-Nov-10	
Date Received : 22-Mar-10		Date Collated review circulated: 26-May-10	Summary of Review: 26-May-10		<p>There are a total of 66 Items listed on the Review sheet, of which 17 have been identified as showstoppers. There are a further 53 Quality matters. A teleconference has been arranged for Monday 14th June to clarify any items raised and to discuss the next steps.</p>											
Date Received : 16-Aug-10		Date Collated review circulated: 14-Sep-10	Summary of Review: 14-Sep-10		<p>There are 16 main items, and 6 Q &amp; P items outstanding. Please address these and resubmit this review sheet, along with any amended documents to Jenny Buffrey / Raahil Javaheri.</p>											
Date Received : 26-Oct-10		Date Collated review circulated: 10-Nov-10	Summary of Review: 10-Nov-10		<p>There are 3 items outstanding. Please address these and resubmit this review sheet, along with any amended documents to Jenny Buffrey / Raahil Javaheri</p>											