

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

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

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

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

Cornwall and IoS SMP2 consultation documents comments form



Document Title:	Cornwall and IoS SMP2 Task 4.1 Approve the draft SMP2 in principle	Project No.:	9T8801	To be returned to:	Julie Davies j.davies@royalhaskoning.com
General Comments:		Reviewer:		Organisation:	

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

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

Cornwall and IoS SMP2 consultation documents comments form							
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General Comments:				Reviewer:	Organisation:		
Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date
Appendix B	There is no reference to St Just in Roseland submission or consultation				Engagement event was listed but with no date. Date now added and their submission acknowledged.	J Dunstan	11-Aug-10
Appendix D	There is scant consideration of UK BAP habitats, notably Coastal Sand Dunes, which are not referred to for instance at Pentewan and Praa Sands. This under sells the Natural Environment features and also misses funding opportunities through UK BAP Outcome Measures.	Review and revise Appendix D to reflect UK BAP habitats.	J Payne	05-May-10	UK BAP Habitats covered in individual PDZs in Chapter 4	J Dunstan	11-Aug-10
Appendix A					Wording in section A7 and A8 updated to reflect the stage we are now at.	J Dunstan	4-Aug-10
Appendix G					Update of Appendix G to reflect changes to policy	J Dunstan	6-Aug-10
Appendix G					Cross check of policy to pick up any errors	J Dunstan	6-Aug-10

Cornwall and IoS SMP2 consultation documents comments form



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

Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date
Page 4	Delivers a moderate balance with mainly minor positive or minor negative impacts. What about in retention and enhancement of UK BAP Sand Dune Habitats (major positive), protection of Marazion Marsh (major positive), allowing Fal and Helford SAC to evolve with sea level rise (major positive), WFD measures of MR at Hayle (major/ moderate positive)?	Revise SEA to reflect UK BAP habitat etc importance	J Payne	05-May-10	Review of assessment following policy changes has provided additional significance of the benefits arising from the SMP. Noted in the SoEP.	P Thornton	16-Jul-10
3.2.2	The River Fowey is not mentioned as a significant south coast estuary whereas the smaller Helford Estuary is included (as is the Ganel on the North Coast).	Check significance and include as necessary (or exclude lesser relevant estuaries that are included)	J Payne	05-May-10	Refers to width of the estuary rather than length of the estuary. However, relevant significance of the estuary has been considered in the assessment.	P Thornton	16-Jul-10
Table 4.1	Benefits of policy are not appropriately scored. For example, PU9.3 Caerhays, NAI and MR will provide protection or enhancement of UK BAP Coastal Sand Dune habitats and as such Objectives G and K should score a Major positive, instead these are given as neutral. Similarly, PU19.6 Marazion Marsh, HTL will maintain the SPA, yet objective G is given as Neutral for HTL when it should be Major Positive. Ironically NAI of Marazion Marsh, which we know would result in the destruction of the Natura 200 site is given a positive score on maintaining natural habitats!	Revise SEA to reflect the importance of UK BAP habitat, Natura 200, SSSI sites, WFD objectives etc	J Payne	05-May-10	Following policy changes, the review of impacts and significance have identified more significant beneficial impacts of the SMP, and these are reported in the SoEP.	P Thornton	16-Jul-10
4.2	Major benefits are not reflected in the text or summaries for each PDZ. For example, UK BAP Coastal Sand Dune creation/enhancement provided by MR at Pentewan Sands is not noted in 4.2.8 despite providing Major Benefits. PDZ 5 is given as minor positive or minor negative, despite protecting the Fal and Helford SAC from impacts of climate change which should give a Major Benefit score. Prevention of the loss of Marazion Marsh SPA is given minor positive minor negative, yet is very definitely delivering a MAJOR Benefit by saving the SPA	Revise SEA to reflect the importance of UK BAP habitat, Natura 200, SSSI sites, WFD objectives etc	J Payne	05-May-10	Following policy changes, the review of impacts and significance have identified more significant beneficial impacts of the SMP, and these are reported in the SoEP.	P Thornton	16-Jul-10
5.2.1	This states "Overall the SEA has assessed that no major impacts will affect the integrity of the Natura 2000 Sites within or adjacent to the SMP boundary, however the SMP has the potential to affect minor changes in the condition of these sites along with SSSIs through changes in habitat and coastal management". Yet the Plan has identified that Marazion Marsh SPA is fundamentally at risk of sea level rise and the SMP policy has been selected purely to prevent this.	The SEA needs to be reviewed and corrected. It is clearly wrong about the impacts on internationally and nationally importance habitats.	J Payne	05-May-10	Following policy changes, the review of impacts and significance have identified more significant beneficial impacts of the SMP, whilst impacts on Natura 2000 sites have been avoided, and these are reported in the SoEP and the updated HRA.	P Thornton	16-Jul-10
Annex 1	The tables do not consistently include the Draft Plan policies, e.g. Page 14 Marazion Marsh SSSI and RSPB reserve are given as HTL, MR, MR; whereas Page 16 Marazion Marsh SPA correctly has HTL, HTL, HTL.	The SEA needs to be reviewed and updated for Draft Plan .	J Payne	05-May-10	Consistency of policy details have been reviewed following policy changes. Consistent policy identification is presented in the SoEP.	P Thornton	16-Jul-10

Cornwall and IoS SMP2 consultation documents comments form



Document Title	Cornwall and IoS SMP2 Task 4.1 Approve the draft SMP2 in principle	Project No.:	9T8801	To be returned to:	Julie Davies j.davies@royalhaskoning.com
General Comments:		Reviewer:		Organisation:	

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

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

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

Paragraph reference	Comment	Suggested Text, or action	Name	Date	RH Response	Name	Date
Fig C5.1	Tressilian map does not consider saltmarsh upstream of SAC boundary only those alongside the boundary. This is not adequate. Mudflats are not shown at all.		J Payne	05-May-10	The issues and policies to these sites have been re-examined based on review of topo data and discussion with Natural England and the Environment Agency. Mudflats have been shown on the figure, and are included where relevant in the revised assessment.	P Thornton	16-Jul-10
Fal SAC - Mudflats and sandflats	It is noted that the loss of mudflats is not known, e.g. at Tressilian. Why not?		J Payne	05-May-10	The overall measurement of mudflat loss across the whole estuary is not known, however, the assessment of policy where HTL in particular occurs and whether that would result in restriction to intertidal habitat movement/development/constraint is examined and assessed.	P Thornton	16-Jul-10
Fal SAC - Mudflats and sandflats	HTL at Penryn is promoted and is concluded not to have an effect on mudflats. This tidal creek is presently mudflats and so HTL WILL result in coastal squeeze on the mudflats. The Agency would also question the justification for HTL to provide NEW Flood defences, especially as this is an area of waterside uses which should either be retained as such with no need for flood defences or for roll back of these properties and MR to provide mudflat habitat. The priorities here are wrong, local commercial interests requiring national flood defence funding are being put above international biodiversity interests, this must be wrong.		J Payne	05-May-10	Policy has been revised to take account of potential issues associated with coastal squeeze on the SAC downstream of the areas.	P Thornton	16-Jul-10
Fal SAC - Mudflats and sandflats	What is the relevance of this to Swanpool, it is a saline lake on the coast.		J Payne	05-May-10	The name Swanpool is of the frontage (PU 13.3) rather than in respect of the lake. The assessment is describing the effects of policy at Swanpool.	P Thornton	16-Jul-10
Table 5.1	What is the point of this table here? It doesn't give any information on HRA issues, and is repeated elsewhere.		J Payne	05-May-10	This table was included so that as a semi-standalone document, the HRA identified what policies it was assessing against. These have been revised following consultation and relevant changes, and where policy change occurs in or near to European Sites assessment has been undertaken or reviewed.	P Thornton	16-Jul-10
5.3.12- 14	This is the first discussion in the report (page 69) directed at marazion marsh, it is in a section concluding no effects but the SPA is not mentioned in the text. Where is the discussion?		J Payne	05-May-10	Marazion Marsh and frontage assessment is described in paragraphs 5.4.8 onwards (para 5.3.31 in the revised version). However, the sites highlighted in the box if not mentioned are not affected.	P Thornton	16-Jul-10
5.4.2 - 5.4.7	HTL is concluded as causing an adverse impact. These policies therefore should be changed. NO consideration for preserving mitigation sites upstream is discussed. This is inadequate consideration of the SAC issues in the policy development.		J Payne	05-May-10	The conclusions of the HRA have been changed subject to alterations to policies, intents, and re-examination of effects following additional data, and discussions with Natural England and the Environment Agency.	P Thornton	16-Jul-10
6.1 where to from here?	Revise the plan with alternative policies that do not have adverse impacts on Fal and Helford and Marazion Marsh.		J Payne	05-May-10	Policy revision and examination of additional data in consultation with Natural England have been undertaken resulting in some revisions to the assessment, which are presented in the revised version, and have avoided resulting in an adverse effect arising. Consequently, alternative policies do not need to be examined.	P Thornton	16-Jul-10
5.4.8	This includes reference to largest community on the western tip of UK Mainland. This is meaningless, it could equally refer to Plymouth or to Sennen depending on whether you fixate on the largest community or the western tip.		J Payne	05-May-10	Altered to "one of", however, it is indicative of the central role to the surrounding communities that this area provides.	P Thornton	16-Jul-10
5.4.10	It is unacceptable to say that at this strategic level it is impossible to assess the effects on Marazion marsh. Strategic does not mean crude, it means focus on the priority issues.		J Payne	05-May-10	Policy has been changed and subsequently affects re-assessed resulting in finding of no adverse affect, in discussion and agreement with Natural England and the Environment Agency.	P Thornton	16-Jul-10
5.4.10	If NAI and MR have the assumed impact, why not adopt HTL and protect the site? This is the other clear policy alternative and it does not appear to have been considered.		J Payne	05-May-10	Policy has been changed and subsequently affects re-assessed resulting in finding of no adverse affect, in discussion and agreement with Natural England and the Environment Agency.	P Thornton	16-Jul-10
Padding	There is a lot of padding in the document, e.g. the Glossary includes a number of terms not used in the document, HMA, LDF, DPD, RSS, LP etc. includes glossary and list of abbreviations, loads of blank pages. This all hides the headline issue of the conclusion that the plan can't be legally adopted.		J Payne	05-May-10	Several lines of glossary have been deleted where appropriate, which has not changed the size of the document. Intentional blank pages have been put into the report to ensure that lead Section pages are on the front right of a printed document when reading for ease of searching, readability, and clarity. If printed double sided this only increases the number of pages printed in total by 2 sheets. In relation to the headline issue, it is not accepted that if there is an adverse effect arising out of the SMP policies the plan cannot be legally adopted. If an adverse effect occurs, the test of Alternative Options then IROP1 would need to be undertaken to ascertain whether the reasons for the impact on site integrity are of national interest. In that event, the SMP would then have to identify and commit to appropriate compensatory habitat creation (i.e. through the RHCP).	P Thornton	16-Jul-10
HRA of 5.3.15 to 5.3.18	I am greatly concerned that the HRA makes bold predictions of potential losses of mudflat and saltmarsh without quantifying the trends of sedimentation. One of the reasons for doing an FRM Strategy is because increased siltation has reduced available storage! We really need to know the quantity of mudflat that was there in the original Natura 2000 citation, or when the Habs Regs started (1994). If the increase has been substantial, then future losses due to SLR may be insignificant or trivial (a term from the Act). The figures quoted for losses are very much worst case scenarios - I know they are caveated as such but it raises expectations! EA policy is to consider the range of potential loss and invest accordingly. We will not be investing on a worst case scenario until its reasonably well proven. To start with we might follow a more middle course. We must make the point that investment in realignment will be limited until trends can clearly be established that the mudflats are disappearing.		G Quarrier	05-May-10	This is outside the requirement of the HRA. The HRA is required to assess the affects of the SMP policies, not to provide detailed sedimentation and flood risk assessment. In line with the precautionary principle as required in HRA and the need to identify what is the possible effect based on best information, the areas provide a conservative quantification of change at this strategic level (and appropriate to this strategic level). Further detailed Strategy or Scheme Level investigations will confirm (reduce or increase) what extent of loss through erosion, accretion, and coastal squeeze.	P Thornton	16-Jul-10
MA12 Truro detailed discussion vs HRA	The HRA and summary tables after the detailed discussion point to a conservative worst case loss of 11.7ha mudflats. But the detailed discussion says "some squeeze of the intertidal will occur, the current bathymetry of the estuary basin and the depth of the central channel actually dictate that any losses of intertidal are likely to be very limited"	HRA and summaries of HRA should be updated to reflect detailed discussion, or vice versa.	J Payne	05-May-10	Policy changes have resulted in the removal of habitat lost to Natura 2000 sites as a result of SMP, following re-assessment and discussion with Natural England and the Environment Agency.	P Thornton	16-Jul-10