

North West & North Wales Coastal Group

North West England and North Wales Shoreline Management Plan SMP2

Annex B15

General and Draft Document Responses and Comments

I General Response

Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
PCR_1 Individual	<p>I am seeking to confirm the status of the SMP2 reports and appendices? The main report is noted for consultation, some of the appendices are noted for review. Will the consultation consider revisions to all documents, or just focus on the Policy Actions Plans?</p> <p>The webpage only lists the local authorities and statutory organisations involved in the SMP2 process. I assume other local organisations were also involved, is there a list of these?</p>		<p>The consultation is considering the draft SMP2 including all appendices.</p> <p>Stakeholder lists are given in Appendix B, these will be updated further in the final document.</p>	Update stakeholder lists in Appendix B
PCR_9 Individual, West Kirby	<p>Just how much notice and how much publicity has been given to the meeting at King's Gap Hotel, Hoylake, Wirral which is taking place even as I type?</p> <p>I am most certainly interested but have only just picked up news of this on the web sites of a) The Liverpool Echo and b) The Wirral News both of which date from Wednesday 9th so not much time to notice it and arrange to attend!</p>		<p>Public Consultation took place between the start of October 2009 and the 14th February 2010. Documents were available to view on the coastal group website and in libraries. There were a number of stakeholder meetings in December and these were advertised on the website and in the local press. A balance has to be struck between amounts of notice given as it was considered best not to advertise too far in advance. As well as the notices you saw, the meeting was also advertised on local radio. However, the events were primarily to raise awareness and publicise the consultation and it was not necessary to attend the events to participate in the consultation.</p>	No action required
PCR_5 Individual	<p>The coast is changing. It always has and it always will. TRUE Climate change is predicted to bring about a rise in sea levels, stormier seas and more frequent rainfall, all of which will affect the way and the rate that our coast is changing. SAYS WHO? THIS OUTDATED THEORY HAS NOW BEEN THOROUGHLY DISCREDITED BY MOST LEADING SCIENTISTS APART FROM THE FEW WHO HAVE INVESTED THEIR REPUTATIONS IN MANIPULATING THE RESEARCH TO TRY TO PROVE THE UNPROVABLE. SEA LEVELS HAVE NOT RISEN AND ARE NOT RISING. THE IDEA IS UTTER TWADDLE WITH NO BASIS IN FACT The North West England and North Wales Coastal Group was set up to bring together experts from organisations across the region to look at economic, social and environmental issues and suggest the best possible solutions for managing this change in a sustainable way. LEAVE WELL ALONE AND SPEND THE TAXPAYERS MONEY ON OTHER, MORE IMPORTANT THINGS.</p>		<p>The key focus for the SMP2 is not climate change, it is planning for managing existing coastal flood and erosion risks now and into the long term, taking account of current knowledge.</p> <p>The global climate is constantly changing, but it is generally recognised that we are entering a period of change, particularly with respect to rising sea levels, and the anticipated implications of climate change and sea level rise present a significant challenge to future coastal management. The guidance we have to work to requires us to consider future sea level rise allowances, and those considered in the SMP2 are given in Table C4 of Appendix C. This indicates an allowance of 988mm of relative mean sea level rise over the 1990 to 2115 period in North West England. The Defra allowances give average rates of relative sea level rise for 30 year epochs. The allowances increase exponentially between epochs so it is not surprising that evidence for measured sea level rise since 1990 does not yet match the mean rate expected in the first epoch.</p>	No action required
PCR_10 Individual, West Kirby	<p>I am rather concerned at the way the above "consultation" is being conducted. I can see that it will be OK from the point of view of experts and organisations, but for members of the public - whose views you say you want - it leaves a great deal to be desired. Firstly, the only notice of the workshop at Kings Gap was a small paragraph on an inside page of the local freesheets a day or so before the meeting. Many people (myself included) will not have spotted it in time. Secondly, the appendices setting out summaries of what is currently proposed do not open properly in that they are corrupted and in an extra wide format. Thirdly, most of what is written is (perhaps understandably) in rather technical language which many members of the public may find difficult. I feel that if you genuinely want input from the public you should hold a well advertised public meeting based around a summary document designed specifically for the layman.</p>		<p>The SMP2 is a technical document. However, leaflets explaining the SMP were distributed in libraries and town halls and also at the stakeholder workshops.</p> <p>Public Consultation took place between the start of October 2009 and the 14th February 2010. Documents were available to view on the coastal group website and in libraries. There were a number of stakeholder meetings in December and these were advertised on the website and in the local press. A balance has to be struck between amounts of notice given as it was considered best not to advertise too far in advance. As well as the notices you saw, the meeting was also advertised on local radio. However, the events were primarily to raise awareness and publicise the consultation and it was not necessary to attend the events to participate in the consultation.</p>	No action required
PCR_113 EA	<p>We know through recent experience that a significant review period is required between completion of draft documents and the scheduled publication date. This should be factored into the schedule for SMP2 adoption and sign-off.</p>		<p>The Project Management Board is taking this into account and regularly reviewing the programme.</p>	Review programme

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	There needs to be a clear mechanism to feed back high-level policy and guidance issues to Defra / EA National Quality Review Group. We propose that this is done through a generic action in the Action Plan.		SMP team to ensure that this is included in the high level action plan.	Inclusion for Action Plan
	Linked to the above item, we would like to see a generic action for all partners to contribute to a 'lessons learned' report, to be completed after sign-off. This will help steer future revisions of Defra guidance and provide a useful starting point for officers involved in SMP3! It should address all elements of the project including procurement, project management and consultation.		Noted	Coastal group to develop a lessons learned report
PCR_25 Royal Yachting Association (RYA)	With regard to marine activities in the NW, agree to the draft policies.	Y	The SMP2 team would like to acknowledge and welcome the support given for the North West England and North Wales SMP2.	No action required
PCR_60 Morecambe Bay Wildfowlers Association	Agree with draft policies for Morecambe Bay and the Kent Estuary	Y		No action required
PCR_62 English Heritage & Local HERs	<p>Unfortunately, as you will see below, curators in the NW are deeply dissatisfied with the SMP2 process. There are some very significant methodological issues that need addressing in order to enable people to understand the reasoning behind the preferred policies and to have confidence that the judgements have been made in a knowledgeable and thorough way.</p> <p>Further correspondence:</p> <p>Yes, the consultation documents may well have changed since the comments were made but obviously the process takes quite a long time. I think some more general difficulties are (1) that people are unclear about responding to a policy that may mean that sites of World Heritage Site status do not necessarily warrant protection and (2) that curators are already extremely pressed and have ever increasing workloads. I think many people were under the impression that your work would include contracting your own historic environment advisor to provide the level of input that is needed. Perhaps this is something that should be considered in future SMP rounds.</p>		<p>(Comment sent 23rd Nov 2009)</p> <p>Thank you for taking the time to collate the views of the historic environment curators. Like you, we are disappointed that the curators in the NW are finding themselves dissatisfied with the SMP2 process. It is certainly not the case that any information that they have provided has been purposefully ignored. They have had the opportunity to provide material, and comment on its inclusion, at each stage in the process so far.</p> <p>Please note that the stage we are at now is the most critical stage of the SMP2 development. We need their views and detailed comments on the draft policies for their specific frontages, and the draft action plan that has been developed to manage residual risks. If the curators (or anyone else) consider that different policies should be selected, or that policy unit boundaries need to be revised, now is the time to tell us. Now is also the time to suggest additional actions to be included in the SMP action plans.</p> <p>Further response: Following detailed review of responses at the end of consultation a number of draft policies are now proposed to change from NAI to MR, particularly those in the World Heritage site in the Solway. This will allow for further assessment of risks to historical assets and limited intervention to manage risks related to coastal change if justified.</p>	Review NAI policies with potential for significant historic environment impacts.
	<p>I. Absence of historic environment information</p> <p>As you know the historic environment curators in the NW have tried to engage as fully as possible with the SMP2 process and to this end have provided you and your team with much information on significant historic environment assets along the NW coast and have engaged in the various rounds of consultation. Responses from curators strongly suggest that people feel the information they had previously supplied has not been taken into account. The inclusion of historic environment assets in the tables is extremely uneven. It appears that not all nationally and internationally important archaeological sites have been registered despite the fact that curators made full sets of information available to you. How can people have confidence in the process when only some historic environment assets appear to have been included in the</p>		The information provided was initially used as a basis for Appendix D, the SEA Environmental Baseline Report. This was originally known as the "Theme review", and the earlier version of this report was circulated many months ago and we updated and revised it following comments from stakeholders, including additional historic environment information that was added at the time. Following establishment of the baseline information of features near the coast, the next stage of the project looked at coastal erosion and flooding risks that could affect the features. There are several reasons why historic environment features may not be mentioned in the policy tables in the main document: firstly, the tables are a summary of the information in the larger tables in the	

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	assessment?		<p>Issues and objectives tables, appendix E and the SEA appendix I. Secondly, generally only features where there is a risk of loss due to coastal erosion or coastal flooding over the 100 year period under the NAI scenario appear in these tables. There are many HE features that are near the coast that are not at significant risk and so not mentioned in the policy statements.</p> <p>For example in Appendix G, section 3: Objectives assessment for Whitehaven to Workington (pg 376):</p> <p>We have identified that under NAI there would be potential loss or damage to Old Quay and Old Quay Lighthouse Scheduled Monument (SM) at Whitehaven due to tidal flooding. However, there is likely to be no flood and erosion risk to Parton Fort Scheduled Monument or part of the Hadrian's Wall World Heritage Site at Parton.</p> <p>Under the 3 policy scenarios tested the Old Quay and Old Quay lighthouse (SM) at Whitehaven would be protected from tidal flooding. We have therefore not mentioned the Parton Fort SM as there is no risk to this under the 3 policy scenarios tested or under NAI.</p>	
	<p>2. Opaque methodology</p> <p>There are significant concerns about the methodology that has been adopted and the judgements that have been made. There is a lack of transparency about the methodology and process. Curators do not understand what account has been taken of historic environment assets in arriving at the preferred policies. For example, it is unclear why, if historic environment assets are to be included as a consideration in SMP, that coastline with sites of World Heritage Status should have a preferred policy of No Active Intervention. As has been explained in previous rounds of the SMP exercise, World Heritage status is the highest possible international designation for HE assets. If WH sites do not qualify for proactive management, what are the chances for sites of national or local importance and what is the point of engaging in a consultation with the historic environment sector?</p> <p>Trying to balance disparate factors is obviously extremely challenging. Curators feel that, while the tables lists social, environmental and economic justifications, considerably more weight appears to have been given to natural environment than historic environment factors. For example, there are areas like 'Dubmill Point to Silloth', where the entire environmental section relates only to the SSSI site (and advocates allowing natural processes to continue) without mentioning scheduled sites and a Roman cemetery. Undertaking no management is described as necessary to conserve the environmental status of the area – clearly this does not conserve the historic environment! There needs to be an explicit statement of how the various factors and interests are being taking into account and balanced against each other. The whole methodology for balancing costs and benefits used to put forward the tables is unclear.</p>		<p>The methodology is described at some length in the SMP appendices. I am not sure how we can best explain the approach to HE curators other than referring them to the documentation, including the SMP Defra SMP guidance and English Heritage's own SMP guidance. If some of them have not seen English Heritage's guidance, which was launched in parallel with Defra's SMP guidance we should make them aware and this may help them to understand the approach and what they should expect.</p> <p>Turning to your comment on World Heritage sites, the two designated areas near that Cell II coast that I am aware of are the Liverpool Maritime Mercantile City area, and the area around Hadrian's wall. For the former, proposed SMP policy is to HTL for all three epochs. The Hadrian's wall site covers a large area of the southern shore of the Solway. The site includes a variety of different shorelines and some of the designated area is saltmarsh, seaward of the high water shoreline. Although the channels are mobile and it is a high energy environment, the shoreline of the Solway is not predicted to be at significant erosion risk. There are however, significant flood risks.</p> <p>I agree that the Dubmill Point to Silloth (I le 5-1) SEA impacts table, which states "No known impacts on the historic environment" should be more specific and mention the assets of the WHS. The proposed policy in all 3 epochs is NAI, which is believed to reflect current practice. As you say, the whole of the coast is within the Hadrian's Wall WHS, although the specific scheduled monuments are understood to be set back from the shoreline and not at erosion risk over the SMP period.</p> <p>Beckfoot Roman Fort built as part of the northern frontier defences, along the west coast is included in Appendix D (Annex D5, pg 19). Where it is noted that: 'visible as a slight raised platform, its unscheduled associated cemetery is the subject of ongoing coastal erosion. It is part of the Hadrian's Wall World Heritage site and at risk of further erosion'.</p> <p>The cemetery is not designated as part of the SM and therefore has not been included in the objectives assessment. The objectives assessments also does not mention Beckfoot Fort as it is not considered to be at risk under NAI or the policies tested, which is supported by the NWRCZA: 'Little of the fort at Bibra/Beckfoot (NY 08964884; SAM CU255; NMR 9087; HER 625C) survives</p>	<p>Review proposed policies in World Heritage Sites and where appropriate revise NAI policies to MR to allow responsible bodies to manage the risks related to coastal change through recording, adaptation and limited intervention where appropriate.</p>

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	<p>Further communication:</p> <p>On draft Action Plans, I agree with you that it is crucial for the relevant people to be involved in these. As you suggest, assessing the coastal risk to the historic environment features at Beckfoot and developing a strategy for managing that risk would be a useful outcome. As you know, scheduled monuments are not the only significant historic assets along the coast. Also, further discussion on the impacts of the SMP policy on Piel Castle and other at risk areas would be welcome. To that end, please send current versions of the draft Action Plans for Cumbria and Lancashire and I will circulate to those people.</p>		<p>as surface expression but internal details are still clearly visible on aerial photographs and have been mapped (Fig. 9.11), along with the extensive vicus (NMR9087; HER 626 C) which survives to the north and south of the fort, as part of the Hadrian's Wall NMP. The site is situated on a low-lying sloping ground with the highest point on the western edge which overlooks a low till sea cliff. The site is not considered to be at risk of erosion in the near future however (M. Collins, pers. comm.).'</p> <p>In the NWRCZA: 'Beckfoot Cremation cemetery (NY 08654850; HER 591 C) is located 400m south of the Roman fort, adjacent to the location of Milefortlet 15. The site has been known about for over a hundred years and was revealed by coastal erosion. The first excavation revealed a funeral pyre in 1948 (Hogg 1949). Continuing erosion has produced further finds of pottery, wood and metalwork. Whilst the HER states that erosion and shifting dunes have obliterated the site recent geophysical survey and trial trenching suggests otherwise, with finds of coins and other material. British Archaeology magazine for September-October 2009 records that as recently as June 2009 a complete pottery vessel containing cremated human bone was found on the foreshore. Coastal erosion in this location has been recorded at over 0.3m a year by English Heritage and milefortlet 15 (mentioned above), may have already been completely eroded.</p> <p>The site is obviously of enormous importance, particularly given that little is known of the cemeteries associated with the Roman frontier defences and, given the years of erosion, which may have seen over 30m of land lost to the sea, the site is seen as a priority for further work. The SMP 2 draft policy for this section of coastline is NAI so the erosion of the site will continue unabated. Clearly the site at Beckfoot is in need of urgent archaeological intervention. The important Roman cemetery site at Beckfoot, to the south of the fort, is one of the most significant sites identified as part of the NWRCZA which is subject to active erosion by coastal process and therefore requires immediate archaeological fieldwork.' We therefore need to mention the risk to the unscheduled cemetery as well as in the action plan, potential adaptation / mitigation measures such as the need for recording the feature before it is lost.</p> <p>Do you agree that the action plan for this section should be amended to include a more detailed assessment of coastal risks to the historic environment features and a strategy for managing that risk?</p>	
	<p>3. Inconsistency and specific objections</p> <p>Several curators noted that the treatment of scheduled monuments and historic environment assets generally is inconsistent. For example, there is no mention at all of the scheduled monument of Ravenglass Roman fort (Glannaventa), or that part of it is seaward of the railway line, and subject to threat of erosion. In relation to Piel Castle, the 'built environment' lists "ferry slipway and public house" but not the castle. The "Do Nothing" option suggests "beach losses likely on SE corner of Island", without mentioning of the likely damage to the monument. The section 1 e 4, 3 advocates letting the defences put in place to defend the Medieval salt pans at Allonby salt pans (inaccurately described as Roman) decay and then removing them. These defences are thought to have worked well, and were put in place with the full consent of the interested parties. Curators oppose the presumption of their removal and it is suggested that this be reconsidered and the defences maintained and renewed.</p>		<p>Where your colleagues notice specific inconsistencies and omissions, please can they let us know so that the documents can be corrected?</p> <p>Ravenglass Roman fort is mentioned in the draft policy statement for 1 d 3 summary SEA table, and Action Plan, where a study is recommended. The site is in policy unit 3.1 and is shown on the policy mapping. This is an area where we were uncertain where to put the PU boundary, as the site could alternatively be included with the Ravenglass frontage PU 3.2, where we have recommended a draft HTL policy. According to the draft RCZA report from ARS the site seaward of the railway has been subject to erosion and this is why we recommended a study, which should consider the risks and viability of provision of protection and confirm the policy for the next SMP review.</p> <p>The draft policy statement for Piel Island proposes a general no active intervention policy for the island, with the proviso that localised defences, e.g. at Piel Castle would be permitted, subject to consent. The environmental</p>	

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			<p>justification summary given is “Natural sections of coast should remain as such to maintain the character of the island. Defences at Piel Castle would have minimal wider impact.” Under economic justification summary there is a note that “limited defences for the Scheduled Monument may be viable, not valued at this stage”. Also, an item has been included in the action plan to consider in more detail the impacts of the SMP policy on Piel Castle. Your advice on the appropriateness of the proposed action plan item, including responsibility is welcomed – presently shown at EA, but may be more appropriate to be EH as owner of the property?</p> <p>Piel Castle reference relates to SMP1.</p> <p>Section 11e4:3 I suspect you quote is from a pre-consultation draft, because the policy approach in the latest version, as on the website since the start of October, specifically allows for local limited intervention at the heritage assets in the short term (0 to 20 years) and for this to continue over the medium and long term if is sustainable to do so.</p>	
	<p>4. Presentation</p> <p>The layout of the tables gives an unhelpful impression, with the advocated management proposal being given first with the characteristics of the coast second. It would be preferable to identify the factors that need to feed into the policies first and use these as a basis for identifying the preferred management.</p>		<p>We are very disappointed that you consider the layout of the tables unhelpful. The format was discussed and agreed with the PMB and we believe that most people thought that it was an improvement on the approach used in other SMP2s. This was because it gives a simple explanation of policy and potential management approach, a summary of justification, implications to the SEA receptors, and a draft list of actions that need to be undertaken to help put the proposed policies into practice.</p>	
<p>PCR_86</p> <p>Cumbria Local Access Forum (CLA)</p>	<p>Broadly agree with draft policies</p> <p>Complete lack of reference to Marine & Coastal Access Act introducing access along entire coastline.</p>	Y	<p>The SMP2 team would like to acknowledge and welcome the support given for the North West England and North Wales SMP2.</p>	<p>Make reference to the Marine and Coastal Access Act in the main document.</p>
<p>PCR_100</p> <p>The Crown Estate</p>	<p>We are aware your SMP process has been out to consultation, a process we embrace and in which we welcome the chance to participate. Whilst we do not have any specific comments we have prepared the enclosed briefing note which we would be grateful if you would take into account when collating information and making decisions on policy and forward to anyone that might be connected with the decision making process.</p>		<p>The SMP2 team would like to acknowledge and welcome the support given for the North West England and North Wales SMP2 and the helpful clarification of the Crown Estate’s position in the briefing note.</p>	<p>Add to high level action plan the need to have early discussions with the Crown Estate for any proposed managed realignment sites.</p>
<p>PCR_114</p> <p>British Association for Shooting and Conservation (BASC)</p>	<p>BASC are grateful for the opportunity to respond to this consultation and look forward to working with the North West England and North Wales Coastal Group as the process moves forward.</p> <p>BASC was founded in 1908 as the Wildfowling Association of Great Britain and Ireland and is the UK’s largest shooting association. BASC is constituted as an Industrial and Provident Society and has a membership in excess of 130,000. BASC is the representative body for sporting shooting in the UK and the largest fieldsports organisation . It aims to promote and protect sporting shooting and the well being of the countryside throughout the UK and overseas. It actively promotes good firearms licensing practice, training, education, scientific research and practical habitat conservation. BASC believes that all who shoot should conduct themselves according to the highest standards of safety, sportsmanship and courtesy, with full respect for their quarry and a practical interest in wildlife conservation.</p> <p>BASC’s expertise in shooting matters is widely recognised and it is routinely consulted by a variety of government departments and agencies (including the Home Office, Defra, LANTRA & The Health and Safety Commission) and other statutory and non-statutory bodies.</p> <p>BASC represents approximately 165 affiliated wildfowling clubs in the UK with a total</p>		<p>The SMP2 team would like to acknowledge and welcome the support given for the North West England and North Wales SMP2.</p>	<p>No action required</p>

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	<p>membership of around 15,000 individuals. Wildfowling clubs manage more than a quarter of a million acres of land (104,000 hectares) in the UK, 90% of which is designated as Sites of Special Scientific Interest (SSSI). In England, Wales and Northern Ireland BASC affiliated wildfowling clubs lease some 700km of foreshore from the Crown Estate. Increasingly, wildfowling clubs are buying farmland that had previously been drained to allow farming. These areas are now being returned to wetland for the benefit of wildlife and quarry species. This complements Environment Agency managed realignment schemes and flood risk management.</p> <p>Wildfowling is the pursuit of quarry species of ducks, geese and waders with a smoothbore gun, principally on estuaries and coastal marshes, but also on large wetlands further inland. Wildfowling is usually a solitary activity and in England and Wales takes place from 1st September to 20th February on the foreshore and ending 31st January inland. Wildfowling is a recreational benefit for local communities and wildfowling clubs provide a focus for wardening of land, monitoring of wildfowl and habitat protection and improvement. The Birds Directive (1979) fully recognises the legitimacy of hunting of wild birds as a form of sustainable use. Wildfowling is an activity that provides significant social, cultural, economic and environmental benefits in the UK.</p> <p>Management of the wildfowl resource by local communities is integral to the management of wildlife on our coasts and an important aspect of our coastal heritage. Land managed for wildfowling often plays an important role in local flood management risk strategies and wildfowling clubs are well placed to deliver continued benefits to such strategies, especially in the management of land involved in managed realignment projects.</p> <p>Wildfowling clubs manage land involved in Environmental Stewardship and Higher Level Stewardship schemes. BASC encourages more clubs and members to participate in such projects. We recommend greater empowerment of local communities in the management of land as a long-term strategic benefit to flood risk management. As stated, many clubs undertake conservation work on the land on which they shoot, actively participating in Environmental Stewardship schemes for example, and undertake regular litter removal and clean-up work on the coast. Natural England (NE), which is the statutory conservation agency for England, recognises the value of shooting to conservation.</p> <p>BASC recognises the importance of the coastal environment and the need to balance different user needs. The North West England and North Wales Shoreline Management Plan SMP2 consultation should recognise the long standing and culturally important activity of wildfowling and the sensitive nature of the habitats over which wildfowlers shoot.</p> <p>In 2004, an estimated 2.6 million work days were undertaken on habitat and wildlife management as a result of sporting shooting in the UK. This is the equivalent of 12,000 Full Time Equivalent jobs.</p> <p>As a result of sporting shooting, £250 million was spent on conservation activities and that shooters themselves contributed 2.7 million work days, the equivalent of 12,000 full time jobs. £8 million alone was spent on tree planting. The total value of sporting shooting to the UK economy in the same year was £1.6 billion. (Source 2006. PACEC. Economic and Environmental Impact of Sporting Shooting in the UK. Available online at www.shootingfacts.co.uk), Given this level of involvement, we hope that developing policy will recognise the important contribution shooting makes to the environment, and that the activities of those involved will not be inadvertently restricted.</p> <p>BASC acknowledges the visions outlined in the consultation document for North West England and North Wales Shoreline Management Plan SMP2. BASC believes this process complements existing government coastal initiatives which BASC and its members are actively involved in at national and local levels e.g. Marine Bill, Coastal Change Policy, Natural England and Environment Agency programmes.</p>			

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PCR_118 Individual, Flookburgh	<p>I have been a fisherman in Morecambe Bay for most of my 55 years and can trace the same job back through my family for 200 years at least.</p> <p>This is a fact.</p> <p>The sea levels have not risen by one single millimetre and the rivers running into the Bay are less full than they have ever been.</p> <p>Erosion will continue as it has for millions of years but nothing is going to happen in the next hundred that warrants your wasting tax payer's money so get off the case.</p>		<p>The key focus for the SMP2 is not climate change, it is planning for managing existing coastal flood and erosion risks now and into the long term, taking account of current knowledge.</p> <p>Within Morecambe Bay the movement of the channels can represent a more significant short and medium term challenge to coastal defence management and flood defence than sea level rise. We need to plan to manage our coastal defences irrespective of sea level rise.</p> <p>The global climate is constantly changing, but it is generally recognised that we are entering a period of change, particularly with respect to rising sea levels, and the anticipated implications of climate change and sea level rise present a significant challenge to long term coastal management.</p>	No action required
PCR_149 NFU Cymru	<p>NFU Cymru represents a significant number of farms in the shoreline management plan area running from Great Orme to the Dee Estuary.</p> <p>As an organisation representing farmers, NFU Cymru's number one priority is to prevent flood damage to agricultural land farm buildings and farmhouses.</p> <p>We could not accept a situation whereby there is an automatic presumption that agricultural land can be sacrificed to protect new (and existing) urban developments.</p> <p>NFU Cymru believes that the importance of local participation in flood management issues should not be understated. Indeed, local stakeholders and individuals affected by published policies and possible schemes should occupy a prominent position in any decision-making process. Local knowledge of past history and landscape is too often ignored and the experience of local people is a valuable source of information that should be encouraged and indeed relied upon. So whilst we welcome a commitment to consult with ourselves this must extend to our local network and show a real commitment to taking into account those views.</p> <p>It is also appropriate for us to highlight that a sustainable productive agricultural industry is critical. Disappointingly this has often been undervalued here in the UK. However things are changing and it has been quite noticeable how quickly the issue of food security, even its availability has 'climbed' the political ladder in the last 12 months.</p> <p>Clearly as our population increases and our diet evolves together with changes in climatic conditions coupled with other factors, we here in the UK will become increasingly dependent on our agricultural land, not only for our own ability to produce food but for energy resources also.</p> <p>NFU Cymru policies and priorities</p> <p>We firstly outline some general points of principle that NFU Cymru regard as being central to any shoreline management plan.</p> <ul style="list-style-type: none"> - Our number one priority is to prevent flood damage to agricultural land. <p>To this end, we firmly believe that existing defence structures should be maintained, which is often a cheaper option than new capital investment schemes - a fact that is often overlooked.</p> <p>That increased spending will be required to maintain current flood defences and the Government and its agencies must acknowledge, not just the requirement for further resources, but also their responsibility to mitigate the negative effects of flooding and protect both industry and the public.</p> <ul style="list-style-type: none"> - There must not be an automatic presumption that agricultural land can be sacrificed to protect new urban developments. If flood storage areas are sought, or flood mitigation actions are to be reduced then full and proper consultation must be conducted and full and proper 		<p>We note the support given by NFU Cymru to Hold the Line policies.</p> <p>The weight that is given to farmland in flood and erosion risk management appraisals has increased very significantly over the last few years. The approach to assessing the national economic value of farm land has changed to reflect the changes in agricultural subsidies. Previously, the approach was to take the economic value as 45% of market value. This has now changed to market value less £600/ha. Market values have also substantially increased and these land value increases have been included in the SMP economic assessment, which uses land values varying by agricultural land classification, but typically of the order of £13,000/ha.</p> <p>We agree that the importance of food security has changed recently, and there have been a number of comments received reflecting the importance of agricultural land.</p> <p>In the final version of the SMP2, we will propose a high level action plan task for further consideration of the implications of land use change related to SMP2 policies. This could be taken forward with the Environment Agency's developing Regional Habitat Creation Programmes or at national level.</p>	Add further consideration of policies in relation to food security and the importance of agricultural land to the SMP2 action plan.

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	<p>compensation must be paid through good discussion and agreement.</p> <p>Strategies should recognise the importance of agricultural land. Agriculture is a commercial interest but for some reason it is not afforded the same consideration as, for example, industrial and commercial concerns - these are usually within built up areas and are therefore reasonably well protected. Agricultural land, often purchased through a mortgage, is a capital asset of a business. Those outside of agriculture seem unwilling to accept or simply fail to grasp that agricultural land has an economic as well as environmental value, and its future affects individuals, families and livelihoods.</p> <p>The true value of agricultural land is its market price and this is not recognised or taken into full account in scheme appraisals. This view is once again, portrayed in the Shoreline Management Plan 2 - which disappointingly fails to acknowledge agriculture as a key policy driver in setting out future options for the relevant policy units. This must be corrected.</p> <ul style="list-style-type: none"> - Clearly, it is absolutely vital that the SMP acknowledges the true cost to the UK economy of annual flooding of agricultural land. This is even more important as global commodity prices rise and food security and even food availability become a concern. It should be accepted that generally there is a gross underestimate of the true annual costs of flooding to agriculture which we contend is far in excess of current DEFRA and WAG estimations. - Landowners are being asked to contribute to mitigating the effects of flooding on society by accepting floodwaters onto their land to protect people and habitats. Full and proper compensation must be paid in return for this service to society. Land is a farmer's investment in his business and in his and his family's future and any compensation must therefore properly reflect the actual value of the farmland. <p>Agriculture</p> <ul style="list-style-type: none"> - Flooding of farmland is often viewed as a minor problem for those unaffected but we would like to highlight that in the main standing water is not 'good' for productive farmland, it will lead to ongoing crop losses and long term damage to the soil. <p>It is also a common misconception that farmers insure their crops and will therefore be making insurance claims to offset their losses. This is not the case as most insurance companies will not insure standing crops. This of course could be the reason behind the lack of data on actual economic losses arising from the flooding of agricultural land.</p> <p>Questions then arise as to whether land will be eligible for the Single Farm Payment, whether it will conform to requirements of Good Agricultural and Environmental Condition under the cross compliance element of Common Agricultural Policy.</p> <p>Coastal defence budgets should be increased. Maintenance of existing sea walls tends to be neglected at the expense of capital projects. There should be a continuing commitment to existing defences which can be maintained for relatively modest funds.</p> <p>Conclusion</p> <p>A sustainable productive agricultural industry is a critical asset for the UK and will become increasingly so. The 2010 Oxford Farming Conference has heightened this view as Government realise that food security is a major issue at present and has openly stated that farmers will have to produce more from the land that we have in the UK. Therefore, increasing flood activity on land which is highly productive goes against Government policy.</p> <p>As usual, agricultural appears to have been dismissed as unimportant. We would argue that there needs to be an estimate of the acreage at risk in each policy unit and what is produced of this acreage.</p> <p>We do, however, hope that the Hold the Line approach allows for existing defences to be maintained, repaired and improved over time to allow the agricultural land at risk in this Plan</p>		<p>Much of the north Wales coast is low lying and susceptible to tidal flood risk. Due to the inter-connected flood risk the over-arching SMP2 draft policy for north Wales is to hold the line. There are limited areas of proposed managed realignment in the Clwyd and Dee that will be considered further in coastal defence strategies.</p>	

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	<p>to remain as productive land as food and energy demands increase.</p> <p>Farming may be prepared in the light of consultation to be part of a solution but not the solution</p>			
<p>PCR_190 NFU</p>	<p>The NFU in the North West welcomes the opportunity to comment on the draft North West and North Wales Shoreline Management Plan (SMP). We represent 6,500 Farmers and Growers and see our role in this process as critical to its success. In addition it is of the utmost importance that farmers and growers are also directly involved as it is they who will almost certainly see their day to day business affected by any changes to the current management of the shoreline along our coast. The economic, social and environmental contribution made by this land based sector must receive serious consideration when deciding on long term strategies and policy for coastal management.</p> <p>There are similar issues of concern for our members wherever their businesses are located along the coast from Great Orme's Head to the Scottish Border. For this reason we feel it's appropriate to respond generally to the document.</p> <p>General comments</p> <p>The NFU and its members view the Shoreline Management Planning process with a great deal of interest. During this consultation process it is clear that confusion has arisen, amongst the membership, in relation to the role that the SMP will play in management of coastal processes over the next century. We understand that this is a high level, strategic document that will set the policy direction as opposed to outlining specific projects at locations along the North West coast. We will endeavour to make this clear to members in continued communication following the conclusion of this consultation.</p> <p>On that note however it is crucial that when projects are being considered within the next phase of planning that the membership are the first port of call when projects are being developed. Too often public organisations overlook the fact that agricultural land is a business asset which must be treated, now more than ever, as a precious commodity. Farm businesses will move to protect that asset, if it comes under threat.</p> <p>However we welcome the forward look that the long term nature of the SMP affords. This should allow adequate time to adapt and mitigate to the effects of the changing climate as well as the impact which natural coastal processes have.</p> <p>With the publication of 'Food 2030' in January 2010, Defra have for the first time in almost 60 years formally recognised the value of the agricultural and horticultural industry's primary products.</p> <p>Food security, it seems, has finally taken a step up within Defra's estimation. The document sets out the steps the government feel will need to be taken to produce more food without unnecessary damage to natural resources, against the back drop of climate change whilst improving food safety.</p> <p>Given this back drop, the SMP must now recognise the role the North West has to play in the increased demand there will be for locally sourced food and energy. British agriculture is well placed to deliver both these requirements.</p> <p>In order to allow the industry to respond to this challenge we suggest that the objective which suggests the minimisation of coastal flood and erosion risk to agricultural land and horticultural activity is amended to read;</p> <ul style="list-style-type: none"> o To maintain the productive capacity and biodiversity benefits of farmland and the countryside <p>At present the strategy fails to adequately recognise the importance of agricultural land. There is an automatic assumption amongst national and some local stakeholders that a defence on an undeveloped stretch of coast could be realigned or in the worst case scenario abandoned, with</p>		<p>Response noted, also see response to PCR_149 above.</p> <p>This is correct, thank you for assistance in this process.</p> <p>Noted. We will make the coastal group aware of the importance of early involvement of NFU to represent farmers and landowners.</p> <p>We note that in England, the Defra "Food 2030" strategy launched in January 2010 and so was not available to be taken into account when developing the SMP2 consultation draft documents ready for the start of the consultation period which commenced in October 2009. There is a proposed action in "Food 2030" to improve methods for valuing ecosystems through "Applied research looking at how food production and consumption in the UK links to the value of ecosystem services principles for decision-making which help in considering whether to convert land or intensify food production in the UK based on a proper assessment of costs / benefits based on ecosystems services". We will propose in the final version of the SMP2, a high level action plan task for further consideration of the implications of land use change related to SMP2 policies. This could be taken forward with the Environment Agency's developing Regional Habitat Creation Programmes or at national level.</p> <p>Response noted. However, the SMP objectives were set, following consultation with stakeholders in 2008. As we have developed and consulted on the draft plan it is difficult to change objectives now. However, this could be taken into account in setting objectives in the more detailed strategies that will follow on</p>	<p>Add further consideration of policies proposing land use change in relation to food security and the importance of agricultural land to the SMP2 action plan.</p> <p>Action for coastal group to consider this in strategies in future – or produce guidance for strategies?</p>

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	<p>the resulting creation of new wildlife habitat because 'there is nothing there worth protecting'. Agriculture is a commercial interest but is not afforded the same consideration as, for example, industrial commercial concerns which are usually in suburban areas and therefore reasonably well protected.</p> <p>Agricultural land, often purchased through a mortgage, is a capital asset. There seems a general unwillingness to recognise that agricultural land has an economic as well as environmental value, and that its future use affects businesses and livelihoods.</p> <p>The use of flood or coastal plain in order to alleviate flooding in rural areas, in cooperation with land owners, may offer an effective way to utilise the capacity of land to accommodate excess water. If it is to be proposed that landowners contribute to mitigating the effects of flooding by accepting floodwaters onto their land to protect people and habitats, adequate financial compensation must be payable in return for this service to society. This land is a farmer's investment for the future and any compensation must therefore reflect the capital value of the farmland.</p> <p>The NFU accept that in the current economic climate in the UK there is little prospect of improvements to some sea walls, but are keen to see a range of engineering and non-engineering measures used in concert to manage flood and coastal erosion risk. There should be a continued commitment to existing defences which can be maintained for relatively modest sums. Maintenance is currently being pitted against investment in capital projects as a result of government policy; this seems at odds with the priorities outlined within 'Food 2030'. The imbalance needs to be considered urgently.</p> <p>The NFU also accepts that managed realignment will play a part in achieving sustainable flood defence. Where realignment does take place, it needs to be planned and managed; not left to be determined by chance wherever the defences happen to fail.</p> <p>So in summary the key issues of concern to farmers and land managers are as follows;</p> <ul style="list-style-type: none"> o Sufficient flexibility from the SMP is required to allow individual land managers to manage their land and business assets irrespective of over arching policies o There must be a mechanism which facilitates long term, meaningful cooperation between land managers and the agencies to find local solutions to local issues o Meaningful and genuine consultation is critical where, for example, realignment projects are being considered 		<p>from the SMP2, and in revisions to the plan at SMP3.</p> <p>This is not correct as land values are used in flood and coastal erosion risk management planning at all levels – i.e. SMP / Strategy / Scheme. However, it is true to say that the capital / write off value /ha will generally be less for agricultural land than urban, and this reflects the potential for prioritisation of future taxpayers funding for defences.</p> <p>Response noted. There are many examples of such compensation for flood storage areas.</p> <p>We suggest that NFU take this up at a national policy level, as prioritisation of funding cannot be dealt with in this consultation.</p> <p>Response noted. Following this and other comments from other stakeholders a number of proposed policies have been revised from NAI to MR to allow for a more proactive approach to be undertaken by responsible bodies.</p> <p>The SMP is non-statutory and does not over-ride rights, powers or duties in legislation.</p> <p>The Environment Agency is developing Regional Habitat Creation Programmes and so we suggest that the proposed mechanism should be developed through that programme.</p>	<p>Action for RHCP managers to consult with NFU in order to develop local solutions.</p>
<p>PCR_191 Individual</p>	<p>Thank you for the acknowledgement. It reads as if the stakeholder engagement henceforth is to comprise your decision reported on the web - hardly in accordance with conflict resolution guidelines as issued by DEFRA. Where there is controversial policy change proposed in the Plan I would expect the CSG to set-up a meeting with relevant representatives including the Plan consultants to attempt to address the concerns conveyed. The impression to be gained by stakeholders at present is one of 'Big Brother' rules. I should be grateful for your reassurance that this is not the case and on how the CSG intends to deal with objections to policy proposals from the 'Little Guy' in accordance with Government guidelines on conflict resolution.</p>		<p>Comments sent by Blackpool:</p> <p><i>The response I gave is a standard response and, as you point out, is to acknowledge receipt of comments. It states that the consultation report will be written and put on the website as I believe for some of the comments received this is all that will be needed. However as you point out consultation is two way and in many areas this is already going on with local meetings and responses to initial comments.</i></p> <p><i>This is in addition to the wider public meetings that were held in December and January.</i></p> <p><i>We are holding some internal meetings next week to discuss how the comments received to date need to be dealt with and how they will effect the plan. I fully expect that actions coming out of those meetings will include holding specific meetings or giving specific responses to the majority. I have stayed away from putting this in the standard response as it will inevitably be different at different places.</i></p>	

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PCR_228 Lancaster Port Commission	I attended a meeting in Morecambe Town Hall recently, regarding the above plan, after having read about it, by chance, in the local press. As we received no official notification at the start of the consultation, or for any of the subsequent stakeholder meetings, we have not been given the opportunity to study and comment on the plan. On further investigation, I discover that the Lancaster Port Commission, a Competent Harbour Authority who are landowners in the Lune Estuary, and whose harbour area extends along the coast from Knott End to Lancaster and from Lancaster to Sunderland Point, was not included on the list of invited stakeholders for the original consultation, and indeed have still not received any communication on the matter. I find this perplexing, especially as you consulted my predecessor during your original information gathering stage for the plan. I was led to believe at the meeting that the consultation period has been extended until the end of March. Is this indeed the case, as I understand that there were several other prominent omissions from the original consultee list? Perhaps it could call into question the validity of the plan as a whole if it is evident that the required consultation process has not been performed competently and comprehensively?		<p>Public Consultation was originally programmed to take place over a three month period, from the start of October 2009 until the 31st December 2009. However, issues with uploading the draft SMP2 documents onto the Coastal Group website and delay in production of leaflets resulted in a decision by the Project Management Board (PMB) to extend the consultation period by a couple of weeks to the 10th January 2010.</p> <p>An unforeseen fluvial flood event in Workington in December 2009 meant that the consultation event arranged to take place in Whitehaven the same week had to be postponed. To accommodate this, the PMB agreed to extend the public consultation period by a further month, until the 14th February 2010.</p> <p>Concern was expressed at a number of consultation events held in January 2010 that stakeholders would not have sufficient time to respond to the consultation, especially where there were contentious issues which would require further information and / or meetings to be held. A request for a further extension to the consultation period was discussed by the PMB and as a result stakeholders in 'contentious' areas were given until the 31st March 2010 to finalise their responses.</p>	
PCR_75 RSPB	<p>Climate change, coastal squeeze, Natura 2000 sites and the Habitats Regulations.</p> <p>The RSPB supports management of the coastline that allows natural processes to function wherever possible. We believe this will be especially important in light of the latest climate change predictions, and their associated impacts on sea level rise and coastal squeeze.</p> <p>Coastal management polices such as No Active Intervention and Managed Realignment offer significant opportunities to allow natural processes to prevail and to address climate change impacts. RSPB is also supportive of using natural habitats such as dunes and saltmarsh, as natural flood defences. Opportunities for creation or better management of these habitats should be sought.</p> <p>Much of the NW England and North Wales coast is important for wildlife, including internationally important populations of waterfowl such as pintail, oystercatcher and knot. In recognition of this importance, large sections of this coastline are designated under the EU Birds and Habitats Directives as either Special Protection Areas (SPA) or Special Areas of Conservation (SAC). These sites make up the Natura 2000 network, and the UK government is committed to ensuring that the integrity of this network of sites is maintained.</p> <p>Coastal squeeze and resulting habitat loss pose a real threat to these sites, and the SMP process therefore provides an opportunity to identify coastal management solutions that can create new habitat to maintain the coherence of the Natura 2000 network – this would need to be accompanied by studies into the rate of loss of Natura 2000 sites and habitats, and be linked to both BAP habitat targets and compensation requirements within the Regional Habitat Creation Plan.</p> <p>With regards the Regional Habitat Creation Plan, and compensation requirements relating to the SMP2, we believe that the various Action Planning tables, e.g. Tables 3 and 4 (pages 29-31), Actions for spatial planning and Further Actions, and those relating to the Preferred Policies within each Unit, must identify the need for an action to identify habitat compensation opportunities.</p> <p>New coastal management proposals could also constitute a threat to Natura 2000 sites, and therefore need careful consideration. Provision for this is provided under the Habitats Regulations, which require the competent authority to undertake an Appropriate Assessment of any plan or project that is likely to affect a Natura 2000 site.</p> <p>Consultation -</p>		<p>The support of the RSPB as member of the environmental sub-group of the SMP2 Project Management Board in assisting in development of the SMP2 is acknowledged.</p> <p>The UKCP09 projections were not available at the start of the project in 2008 and so the assessments have been based on the Defra 2006 guidance. It is noted that the guidance used, which makes allowances of almost a metre of sea level rise over the 100 years, is almost twice the 50% probability (i.e. most likely) projection increases from UKCP09 of less than 0.5m over 100 years.</p> <p>Support acknowledged. Following detailed review of responses at the end of consultation a number of draft policies are now proposed to change from NAI to MR. This will allow for further assessment of risks to historical assets and limited intervention to manage risks related to coastal change if justified.</p> <p>We propose to add high level items to the SMP2 action plan to take these items forward, although in terms of mitigation or avoidance rather than "Compensation".</p> <p>The draft Appropriate Assessment recommended that the more detailed strategies and schemes will require more detailed HRA, and this is already included in the action plans.</p>	<p>Coastal Group Action to Consider implications of UKCP09 on the SMP2 policies.</p> <p>Add action to high level action plan.</p>

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	<p>The RSPB recognises the need for consultation with all stakeholders, and especially with landowners and communities who will be faced with changes to the management of their coastline. Early and open dialogue will be necessary, with clear strategies in place to help these landowners and communities adapt to the changes that they face.</p> <p>We remain concerned therefore, that in the first time period being considered by the SMP2 (0-20years), an apparent default policy of Hold the Line (HTL) is being suggested, even where future policies are likely to recommend No Active Intervention (NAI), or Managed Realignment (MR). This appears to us to conceal the likelihood of future NAI or MR options being pursued in these areas. It misses the opportunity to use this current SMP review as the start of the consultation process on the NAI or MR options. It will therefore fail to set in place from the outset the right framework for the consideration of the more progressive options that will be necessary in the future – for example, Policy Unit 7.4, Runcorn to Arpley, we believe there are several safe opportunities for MR with no need to wait until the 20-50 year time period.</p> <p>Furthermore, delaying a policy such as NAI on uneconomic defences would run contrary to Defra and the EA's stated policy on such defences (http://www.environment-agency.gov.uk/static/documents/Leisure/maintenance_1830292.pdf) – where, once notice has been served, a delay of around 2 years might be expected, not 20 years.</p> <p>Where the HTL default has been set in the first time period, the text accompanying each Policy Unit does make it clear that during this period early consideration and investigation into NAI or MR will be made – we understand that this may mean opportunities to pursue these policies come forward sooner than the second time period (20-50yrs). The Action Plan for each Policy Unit reflects the need to undertake these investigations, which we welcome.</p> <p>While we are still concerned by the adoption of this default, and we would argue against this for the reasons outlined above, we welcome the inclusion of the explanatory text (about consideration of future NAI or MR policies). We believe this is crucial, to ensure the likelihood of these options being pursued is not concealed from communities and stakeholders.</p> <p>Broadly speaking, we support the adoption of NAI or MR for those Policy Units where these are proposed as the Preferred Option.</p>		<p>MR is recommended in this location in the draft plan in the medium and long term. We have acknowledged that MR could be possible earlier and have therefore added that where practicable implement Managed Realignment within the first epoch.</p> <p>Response noted and support for policies acknowledged. We understand that policies can and will change as new information becomes available, the more detailed strategies will use a more accurate time plan than the 3 epochs used in the SMP2. At SMP3 the more detailed work from strategies can be used to refine timing of proposed changes to approach.</p>	No action required
PCR_113 EA NW	<p>Where opportunities have been identified for managed realignment/ retreat these should be investigated further. It may be possible to feed actions into local wetland creation schemes which are currently being carried out in the Morecambe Bay area</p> <p>It is accepted that managed realignment may only be possible in the longer term due to stakeholder pressures. However, it is important that potential sites are considered and publicised to stakeholders to make sure these options are possible and have support.</p> <p>When further studies and assessments are made for MR the Area Biodiversity teams would welcome the chance to comment on these in terms of potential habitat creation and biodiversity benefits.</p> <p>The Area Biodiversity teams would like to view any Appropriate Assessments for Habitats Regulations carried out for any sites along Morecambe Bay SPA, SAC, RAMSAR (This is one of the purposes of establishing the SMP2 Environmental Sub-Group).</p>		<p>Response noted</p> <p>The SMP team propose to update the draft SMP2 documentation to make stronger links to the EA's Regional Habitat Creation Programme.</p>	Update the draft SMP2 documentation to make stronger links to the EA's Regional Habitat Creation Programme.
PCR_194 CCW	<p>I. The document fails to adequately link the SMP with the CFMPs which have already been produced</p>		<p>The CFMPs were reviewed and have been taken into account. However, We could explain better how SMPs & CFMPs link up in general terms in the main SMP report.</p>	Explain CFMP / SMP links better in the main document

Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
	2. The issue of maintenance of the beaches in relation to the hold the line option chosen for most of the open coastline is not adequately addressed. The beaches are the first line of defence and also of key recreation importance and the raison d'être for the coastal communities. However sea level rise will cause their increased erosion and loss and will also rob some of the areas nearer the Dee estuary of their natural sediment supply. The SMP as a key strategic document should be providing clear advice as to how this should be addressed at a strategic level.		The consultation draft SMP2 proposed a study of sediment transport and beach management for the north Wales coast. We can make this firmer by turning it into an action to develop a beach management strategy for North Wales.	Revise action plan item to show commitment to developing a strategy for beach management
	3. The sustainability of the hold the line option adopted over the longer term should be more clearly addressed particularly as the Welsh Assembly Government has a statutory remit in this area. We have concerns that holding the line in the longer term, even if the same level of protection is given, will be associated with increased consequences of flooding and this is not adequately defined and addressed.		Similar comments have been made by EA Wales, and we propose to include stronger commitment to the "New Approaches" strategy and tackling risk by warnings, resilience and development control.	Revise items in high level action plan.
	General 1. As the document is extremely large it is not surprising that there are many spelling errors and missing words in sentences within the documents. Welsh place names seem to be frequently spelt differently i.e. Rhyll/Rhyl; Foryd/Forydd. There are also factual errors in some sections for instance Traeth Pensarn SSSI has been identified yet in Appendix G 4.1 (G406) it states that there are no conservation designations present. Additionally some described features are still in the wrong policy unit.		We will correct the specific mistakes identified.	Correct mistakes and spelling errors throughout.
PCR_194 CCW	In our opinion there needs to be recognition that certain factors need to be given higher weighting than others because of the importance attached to them. Consequently areas recognised as of being more than national importance need to be given greater weighting than those of more local interest. Additionally certain features are readily recreatable if necessary elsewhere and should not be given as higher weighting therefore - these include golf courses and cyclepath/footpaths. Alternative cyclepaths/footpaths can be designed into new coastal defence schemes so the argument for their retention in situ is not a strong one. Whilst we accept that there would be reluctance to move them it is not essential that they should be retained in situ if other factors such as flooding of homes and risk to people are threatened. It would have been better to have considered the evaluation in a hierarchical fashion taking account of their identified importance.	Yes in part to policies	Response noted. In response to points from the EA's national review team we have proposed to highlight the important factors or potential showstoppers.	
	The information presented should have been more up to date -it seems strange that information on existing flood banks around the Dee and Clwyd estuaries has not been used as these will have been assessed by EAW for the Dee and Clwyd estuaries as part of their flood risk management strategies. Using Google Earth for assessment seems strange and in our opinion undermines the credibility of the document therefore.		The data collection and assessments of defences for the SMP took place at the start of the project in 2008 and used the best available information at the time. The Dee and Clwyd strategies have started much more recently.	No changes proposed.
	Our previous comments on landscape appear to have been heeded but whether this transpires into action on the ground remains to be seen. There are several examples of fairly poor practice around the estuary/open coast particularly where Network Rail have undertaken work such as between Greenfield and Llanerchymor when consideration of the aesthetics of their construction and implications for users of the coastal path appear to have been ignored- you cannot see the sea anymore unless you climb on the boulders.		This needs to be taken up with at strategy / scheme stage.	No action proposed.
PCR_170 Cheshire West and Chester Council	The Shoreline Management Plan should be integrated with the Tidal Dee Flood Risk Management Strategy being prepared by Environment Agency Wales. The table setting out actions and responsibilities in section 4.2 refers in part 2) to the Regional Economic Strategy. This is now being combined with the Regional Spatial Strategy and Regional Housing Strategy to form RS2010. It should refer in 3) to the need for local authority planning officers to be involved in the process and not just informed. The responsibility should also be with local authority planning officers. 4) refers to the need to submit SMP2 to planning committees. As it is not just a development management issue it should also be taken to Local		As previously noted the Strategy programme is developing behind the SMP, taking account of the SMP findings. It is not possible for the information to flow the other way as the strategy is not yet complete and it is not possible to re-work the SMP at this stage. Update Table 4.2 to reflect responses.	Updated Table 4.2 to reflect comments.

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	Development Framework Panels and other similar panels / committees. SMP2 should be fully incorporated into and taken account of in the LDF, not just used as reference material or an annex.			
PCR_199 National Trust	<p>The National Trust is an independent charity founded in 1895, with a statutory purpose and obligation to 'permanently protect places of natural beauty or historic interest for the benefit of the nation'. We have over 100 years' experience of managing land and buildings and take a long term view of environmental management - a key element of a genuinely sustainable approach - because by statute we are 'here to stay'.</p> <p>The Trust is the largest conservation body in the UK. We are responsible for the protection of some of the most beautiful, important and environmentally sensitive places in England, Wales and N Ireland. This includes nearly 250,000 ha of land, including over 700 miles of coastline, and 250 historic buildings. Much of this property has unique legal protection, called 'inalienability', meaning it cannot ever be sold or mortgaged against the Trust's wishes without the permission of Parliament.</p> <p>In 2005 the Trust published 'Shifting Shores, living with a changing coastline' which set out our approach to managing coastlines. This document draws on the National Trust's experience as Britain's largest coastal landowner. The coast is one of our most dynamic environments. Sea level rise and climate change are forecast to increase the scale and pace of coastal change. To help us plan for the future, we commissioned research to assess how our coastline is likely to change over the next 100 years.</p> <p>The results suggest that many of our important sites are at risk from coastal erosion and flooding. We face some difficult choices in managing this change, but we want to make well informed decisions that stand the test of time. Learning from our experience our policy now favours adaptation, giving ourselves time and space to change with the coast and work with the forces of nature.</p> <p>The National Trust has been involved in the consultation process around the preparation of the SMP2 and broadly supports the policy options and proposals which relate to the land in our care in the Merseyside coast.</p>	Y	The SMP2 team would like to acknowledge and welcome the support given for the North West England and North Wales SMP2.	
PCR_227 Sunderland Point Community Association	<p>Whilst we acknowledge that more opportunities for public consultation were arranged and that the consultation period has been extended, we are still of the opinion that there has been inadequate consultation allowed for response to this important document. In the spring and summer months, the area is visited by large numbers of people from outside the area, to say nothing about the many more who have holiday accommodation locally. Because of the timing of the consultation period, these people will not be offered the opportunity to take part in the consultation process. In addition, there have been notable exceptions to the list of invited stakeholders.</p> <p>As there is a proposal for controversial policy change, we ask that the Coastal Study Group, in accordance with the conflict resolution guidelines issued by DEFRA, will now arrange a meeting between the plan consultants and representatives from the Sunderland Point Community Association, in an attempt to address their concerns.</p>		<p>Although the consultation was not during the summer season, we did receive a number of responses from outside the North West England and North Wales coastal area. Hosting the consultation on the Coastal Group's website helped to make the document available to people who were not local.</p> <p>The SMP2 team is discussing with Lancaster City Council about arranging a meeting with the community association in order to go through the proposed changes at Sunderland Point</p>	

2 Responses Relating to Mapping

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_113 EA	The term 'Indicative Floodplain / Map' is sometimes referred to when describing the flood outline. This is now known as the 'Flood Map' and should be described as such throughout the SMP2. We are able to provide updated maps if required.	In most locations we are trying to describe the area at potential coastal flood risk. The assessments were based on the mapping that has been referenced, so without re-working many documents it would be difficult to switch the map layers. We will change references to 'Indicative Floodplain / Map' and refer to either the 'Flood Map' or 'coastal floodplain' as appropriate.	Amend references to "Indicative Floodplain / Map".

3 Responses Relating to Documentation

4.1 Main SMP Report

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_4 Bourne Leisure Limited	Document is not stakeholder friendly, with no cross-referencing.	The SMP team has decided that additional text explaining the contents of and interaction of appendices needs to be added to the main SMP2.	Add text to main SMP2 document explaining appendices better.
PCR_113 EA	<p>Action Plan general comments</p> <p>When all policy scenarios action plans are collated, there are in excess of 800 draft actions in the consultation draft. Although a good starting point, there is a significant amount of work required from all partners to reconcile these actions into a form which is more easily managed, implemented, reported and placed into the Medium Term Planning framework. For example, does the draft Action Plan recommend strategies in the right areas? The National Quality Review Group has stressed that the Action Plan should be affordable and achievable. To this end, the Environment Agency would welcome the opportunity for continued involvement in action plan development, in particular during consideration of action prioritisation, timescales and funding. The large number of actions for completion by 2015 is unrealistic and needs consideration. We have already started this process internally, and we would like to discuss further with partners before the SMP2 is published.</p> <p>The action owner needs consideration during future discussions. To date, the action owners have not been consulted. To be realistic, all owners need to be fully engaged in the process, to accept responsibility for the action and to confirm that sufficient resources are available to complete the action within the stated deadline.</p> <p>An important point raised by the Regional Flood Defence Committee relates to development control. The action to 'ensure flood and erosion risks are accounted for in planning decisions to aim to reduce the need to manage flood risk in future' is allocated to the EA alone. Planning Authorities should take the lead when making decision so they should be the lead for this action.</p> <p>Consistency. For example, the actions relating to improving flood warning vary. Non for St Bees to Whitehaven; Whitehaven must need warnings. Further consultation with EA Flood Incident Management teams is needed during the development of the Action Plan. Unless EA is satisfied that models for some locations do not need improving then all actions should be like those for Walney Island i.e.: "Continue with improvements to flood risk maps and inundation modelling to provide improved flood warning service."</p> <p>There may be merit for a generic action to acknowledge the potential impact of future government policy decisions upon SMP2 policy. For example, to keep abreast of outcome of forthcoming National Policy Statement on Nuclear Sites and to monitor proposals for tidal barrages at estuary sites in Cell 11.</p>	Further discussions on the requirements for the final version of the Action Plan have been undertaken within the project team, but definitive guidance is awaited.	EA to review action plan and propose specific amendments for agreement by the Project Management Board.
PCR_115 EW Wales	General comment - who signs up to the SMP Actions and in large, multifunctional organisations like the EA, do we need individual sections/departments to sign up? For example, there are items in the Action Plans that we may want to include in the FRM Strategy action plan eg Ref 1.3 in 11a 4 Beach recharge plan currently sitting with EAW as lead but may be more appropriate for LA to lead on, as a coastal erosion issue (strategy is FRM only).	This was discussed by the Project Management Board and it has been agreed that All actions in the Action Plan must formulated so that they can be delivered by Coastal Group Members. This means that it is the Local Authority and Environment Agency members that must sign up.	Action Plan items to be reworded to be deliverable by the Coastal Group members.
PCR_113 EA	There are a number of policy units with a headline policy for medium to long term managed realignment. Under current funding rules the economic case for MR may not always be clear. However, the 'intent of management' and potential for MR should be introduced to coastal communities at the plan level – the economic arguments may strengthen over time (due to climate change, compensatory habitat requirements and government policy in relation to habitat creation). This 'intent of management' aim of SMP2 policy could be emphasised further in the main plan document.	The SMP team agree with this because the headline policy of managed realignment does not necessarily imply an expectation of public funding. This policy covers a large number of potential delivery options, which includes adaptation responses to changing risks, rather than constructing large scale defences.	EA to propose / agree specific changes to explanatory text about intent of management.
	There remains some doubt about the role of estuarine authorities in the SMP2 process. Unlike Maritime	Actions to consider the need to change the location of the Schedule IV	Add item to generic action plan for

Response from?	Response	SMP2 Team Comments	Proposed Action
	authorities, estuarine authorities are not required to formally adopt the SMP2, despite having significant lengths of frontage which are subject to SMP2 policy. This is further complicated by their position which is upstream of the Schedule IV boundary. This prevents those authorities from claiming Grant in Aid under the Coast Protection Act. The future role and status of the estuarine authorities needs to be considered before the next SMP review and this should be reflected by a generic action in the SMP2 action plan.	boundary in some estuaries, such as the Mersey, were already included in the draft SMP2. A generic action can be added to the action plan for the coastal group to consider the role of estuarine authorities.	the coastal group to clarify the future role and status of the estuarine authorities needs before the next SMP review.
	The main plan document may benefit from a clearer explanation of how climate change estimates have been, and will be, incorporated into the SMP2 process. In practice, it is intended that the National Coastal Erosion Mapping project will 'UKCP09 proof' the SMP2s through the publication of a SMP / NCERM comparison report between SMP2 adoption and final sign-off. An alternative is to include consideration of the comparison report as a generic action in the SMP2 Action Plan.	As coastal flooding represents a much greater risk than erosion across this SMP2 area, it is suggested that a high level action plan item should be added.	Add action plan item to review the SMP2 policies in the light of new EA guidance on use of UKCP09 scenarios in flood and coastal erosion.
PCR_98 Barrow BC	1.1 Sub-cell description bullet points (pg. 2) - Is the split between sub-cell 11c and d Haverigg or Hodbarrow Point?	Location of the boundary between the sub-cells had been based on the boundaries report developed before the present study started, but there was confusion in the report. Following discussion amongst the SMP team the boundary will now move to Hodbarrow Point.	Amend boundary, and revise policy units, mapping and other documentation to match.
	1.5 How has the work been managed? (pg. 8) & throughout - The coastal group should be referred to as North West England & North Wales Coastal Group (i.e. England added)	The draft SMP used the Coastal Group name in use at the time.	Coastal group to confirm if change required.
	2.2 Baseline Environment (pg. 11) final bullet point - Refers to population bullet point 'below' – should be 'above'.	Specific item to be corrected.	Correct typo.
	2.3 SEA Objectives (pg. 12) 1st bullet point - Acronym BAP is used with no expansion.	BAP is explained in the glossary, but all acronyms should be expanded at first use, or refer to the glossary.	Check all acronyms expanded at first use or directly reference the glossary.
	2.8 WfD (pg. 16) 2nd para. - Uses technical terms with no explanation, i.e. 'hydrological regimes' and 'water body morphology'. The final sentence of the paragraph repeats the point in the first sentence.	Technical terms should be included in glossary and reference made to the glossary where necessary.	Check technical terms such as those mentioned are included in glossary and cross-referenced.
	3.1 Summary of the Plan (pg. 17) 1st para. - Redundant term 'balanced sustainability' i.e. Is there such a thing as 'unbalanced sustainability'? (maybe me being pedantic).	SMP team to review text.	Review specific text.
	Sub-cell 11c (pg. 21) 2nd para. And elsewhere in the document - Final sentence refers to modifying the groyne at Earnse Point – have the conclusions of the ABPmer Appropriate Assessment report for West Shore Park been taken into account?	The text about modifying the groyne will be changed to a more specific generic action.	Modify / improve text regarding Earnse Point / Westshore Park.
PCR_69 Individual	Main SMP2 document - The map on page 37 is wrongly annotated. Sub section 11e and suffixes are labelled sub section 11d and suffixes. Such lack of attention to detail makes one wonder how many more errors exist in the document.	The errors in annotation will be corrected.	Revise map on page 37, including improving background to more suitable mapping.
PCR_121 Wirral Council	Page 3 Section 1.2 Suggest a change in orientation of Table 1 to reflect hierarchy of SMP / Strategy / Scheme. Text refers to them "sitting at the top" – would be beneficial to represent this graphically via the table structure (for clarity) Also; the role of the SMP within Local Authorities – informing planning decisions via their Local Development Frameworks – should be highlighted (accept it is identified as such later in the doc).	Agree – specific changes to be made.	Action suggested changes.
	Page 13 Section 2.5 Appraisal of policy scenarios against objectives should indicate whether this was done objectively or whether a ranking was given to objectives.	Agree – specific changes to be made.	Action suggested changes.
	Page 16 Section 2.8 Para 2 Typo – influences should read influenced	Agree – specific changes to be made.	Action suggested changes.
	Page 18 Para 2 Birkenhead not protected by north Wirral coastline. Towns of Leasowe, Wallasey and New Brighton are	Agree and will update text to mention towns requested. Note that Wallasey embankment provides flood risk management function for the	Amend text in main SMP doc.

Response from?	Response	SMP2 Team Comments	Proposed Action
	protected but not mentioned.	large area that links through to the Mersey.	
	<p>Page 23 Section 3.2</p> <p>Under the heading Property, Land Use and Recreation Objectives the text describes that where economically viable preferred policy is to maintain existing defences into the long term. It may be worthwhile giving an indication of various funding streams for future maintenance (public / private etc) and also indicating that maintaining private defences is permissible even where it is not considered to be economically viable and where it is not environmentally damaging.</p>	Responses noted. Revised text to be drafted and circulated to project management board for consideration.	Update text for PMB review.
	<p>Page 27 Section 4.1 Last para.</p> <p>The sentence beginning “In many areas of the SMP2....” Has text missing from the end – possibly the words “is required”.</p>	Agree – specific change to be made.	Action suggested change.
PCR_175 Blackpool Council (Planning)	<p>concerns: Page 24: ‘While the preferred policy for many of these areas is to hold the line in the long term, there may be a detrimental impact on tourism through loss of beaches at places such as along the North Wales Coast and at Blackpool, where it will become increasingly technically difficult to retain beaches as sea level rise causes coastal squeezes pressures’. – The Blackpool Local Development Framework (LDF) places great emphasis on the coast and beach as a recreational, environmental and economic asset, and any loss of beach would have a detrimental effect on the resort. As part of the LDF, the Blackpool Core Strategy emphasises the vital role the coast will play in the sustainable growth and regeneration of Blackpool. To ensure the beach remains a valuable asset, we would support future management options to sustain the beach, including the development of a long term beach management strategy.</p> <p>Page 27: ‘promote use of the SMP2 recommendations in spatial planning of land use’ – Reference to the SMP2 will be included in the Blackpool Preferred Option Core Strategy.</p>	Responses noted. The importance of the beach was emphasised in the draft SMP2 and an action plan item identified the need to develop a long term beach management strategy. The important economic value of the amenity beach may need to be better highlighted.	Ensure the importance of the amenity value of the beach is mentioned in the Appendix H and in the action to develop a long term beach management strategy.

4.2 Appendix A

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_115	- Tables should have titles and need to indicate chairs/leads where appropriate.	Specific items to be reviewed and amended as appropriate.	Review & amend text.
EA Wales	- Section A2 – there is a subparagraph numbering issue.	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	A2.1 2nd para reword This SMP, SMP2 was developed and produced in accordance with...	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	A2.2 2nd para reword This group includes the 5 sub cell leads as representatives for all the other district authorities as well as SEA statutory consultees...	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	After A2.4 add comms subgroup here?	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	A2.4 reword (SMP study Boundaries) 2nd para The study recommends that 5 separate SMP2s should be produced for Cell 11 but with some minor modifications to the boundaries from SMP1.	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	A3 flow chart reword Stage 4 needs to be amended to reflect new public consultation dates. Stages 5 and 6 will need to be populated with relevant info once public consultation has been completed.	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	A4.1 4th para reword Initially membership for both the EMF and SF was drafted from the SMP1 list. These were then verified and updated by the PMG and CSG members.	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	A5.1 (b) add Defence data has been double-checked by operating authorities in the CSG.	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	A5.2 1st para clarify WPM – does this mean same SOP (ie. an increase in flood defence heights over time to keep up with climate change) or maintenance of existing structures (so SOP will drop over time)?	SMPs do not specifically consider Standard of Protection, so With Present Management refers to generally taking the same approach as in the recent past. This would normally include considering improvements when necessary due to changes in risk, but not specifically climate change.	Review & amend text if necessary.
	A5.3 1st para 2nd sentence reword Therefore the first stage is to identify... relationships between these features and how coastal management can alter coastal processes and impacts on the environment.	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	2nd para reword The SEA Environmental Baseline Report (Theme Review)...	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	A5.4 1st para reword The definition of issues and objectives is a key activity of the.....they inform the development of policy options and secondly, they help....	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	A6.1 2nd para reword The first stage of the SMP2 assessment was therefore to determine the main factors influencing policy decisions along the coast i.e. key policy drivers. A key policy driver can be defined....	Specific items to be reviewed and amended as appropriate.	Review & amend text.

4.3 Appendix B

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_115 EA Wales	I think either a list of members (PMG and CSG at least) or examples of members should be provided for the different stakeholder groups.	Lists of members of the different stakeholder groups could be added to the Appendix quite easily.	Add lists of stakeholder group members to Appendix B
	Further details of the events could be provided – issues, attendance, outcomes, what was expected of them etc.	We are happy to expand on further details of each meeting upfront in the text, for example purpose of the meeting and outcomes etc. The minutes from each, including attendance lists are already included in the supporting annexes to this appendix.	Amend appendix accordingly
PCR_98 Barrow BC	App B2.1 Table of meeting dates EMF/SF3 meeting - The meeting for sub-cell 11c was held in Waterside House on 19/6/09 not Lancaster Hotel and the sub-cell 11d & e meeting was combined. Ditto for next page.	Thank you for highlighting these errors. The Appendix will be revised accordingly.	Amend appendix accordingly

4.4 Appendix C

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_115 EA Wales	Baseline processes statements for each policy unit (page 43 onwards) – really like this, its well laid out and clear. Not sure if we need to go into so much detail at the beginning of the report telling the reader the headings considered – just do it!	Thanks.	None
PCR_113 EA	Appendix C4 - Mersey Estuary (p. C-200) The embankment around Norton Marsh is listed as “unknown” in origin. This is an Environment Agency defence and should be listed in the NFCDD data already available to the project.	Noted, but probably not included in the NFCDD data at the time of the defence assessment.	Correct specific item.
PCR_98 Barrow BC	App C (pg. C602 - 603) 3 boxes in the table - Location should be Walney Island Middle Hill Lane (not Middle Hall).	Noted.	Correct specific item.
	As above (pg. 604) 2 boxes in table - Location is Walney Island Walk Haw Scar not Walk Hill Scar.	Noted.	Correct specific item.
	(pg. c617) 4th para. And final para.- Walk Haw Scar (not Walk Hill) and Mill Scar (not Mill Hall Scar).	Noted.	Correct specific item.
	Same page final para. - Mill Scar (not Mill Hall Scar).	Noted.	Correct specific item.
	(pg. C619) 2nd para. - Mill Scar (not Mill Hall Scar).	Noted.	Correct specific item.

4.5 Appendix D

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_115 EA Wales	Good logical layout. Like the way the tables indicate what coastal section the character area sits in.	Thanks.	None
PCR_98 Barrow BC	App D (pg. D49) - South Vickerstown is in twice.	Specific items to be reviewed and amended as appropriate.	Review & amend text.
PCR_194 CCW	The map showing international designations is out of date - the Dee Estuary is now SAC and the revisions to the SPA and Ramsar Site are now confirmed. All the Dee Estuary sites encompass at least three separately notified SSSIs in England and Wales (SAC includes 3; SPA 4 and the Ramsar Site 5). The Liverpool Bay pSPA is now out to consultation Certain Welsh SSSI now appear to be missing from the tables whilst sites in England are all identified. Shotton Lagoons and Reedbeds SSSI is not now mentioned although identified previously and Gronant Dunes and Talacre Warren SSSI is not specifically identified in policy unit 4. Parts of this SSSI in Denbighshire are also designated as LNR.	At the post consultation meeting with CCW & NE it was confirmed by CCW that the plan should be based on the information available at the time of assessment, and where there have been changes during the SMP2 review it is not necessary to consider them. Review list and amend / add missing sites.	No action proposed. Amend specific items identified.
PCR_212 CCW	Appendix D, Table 6.9, pg D-66 lists the relevant national, regional and sub-regional planning policies for the plan area, referring to both the English and Welsh planning context. However when considering Appendix I, Table 8.2, pg 39, this only quotes English policy. The equivalent Welsh policies need inserting. We look forward to seeing the final version of this document and working closely with you and the NW & N Wales Coastal Group on the implementation of this SMP. If you require clarification on any of these points do not hesitate to contact me.	Agree. Welsh policies to be inserted. Response noted.	Amend specific items identified.

4.6 Appendix E

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_98 Barrow BC	App E (pg. E132) Golf Clubs row - The defences at Earnse were not constructed to protect the golf course. The land falls away from the cliffs at the shoreline towards a housing estate which lies on considerably lower land. Protection of this estate was the primary reason for the replacement of the defences (with the acknowledged benefit to the golf course at the same time). The defences also provide a degree of protection to West Shore Park as the natural recession line with no defences would be some way back into the park at the present time.	This may be true, but was not apparent from the flood risk maps used in the development of the SMP2. We have flagged elsewhere the need for ongoing improvements to flood risk mapping, particularly where it assumes that natural high ground, promenades or dunes cannot breach.	Check specific text and revise as appropriate.
PCR_194 CCW	SMP objective E 1.1.3 Table 1 E-3 Additional categories of site need to be mentioned including wildlife sites/non-statutory sites of nature conservation importance and if RSPB nature reserves are mentioned then all nature reserves managed by wildlife trusts and groups need to be identified. Both the Merseyside Ringing Group and Deeside Naturalist's Society (DNS) have reserves at the head of the Dee Estuary for instance. Part of the DNS's current reserve consists of a series of pools bounded by a bank to retain water adjacent to the river channel. This is filled by ingress of waters over a tidal period and can be overtopped on the biggest tides but is vulnerable to breaching	<p>Any non-statutory wildlife sites designated by local authorities were picked up and included in the planning policy summary sheets which were included as an annex to the theme review. These sheets were summaries of the primary planning policy documents (eg. local plans, minerals and waste planning docs etc) which each LA has produced. There were a couple of reasons why we identified them in this way rather than in the main nature conservation chapter:</p> <ul style="list-style-type: none"> • as locally designated, non-statutory wildlife sites are identified and designated as part of local planning policy, we felt that it would be best to make reference to them in the planning policy summary sheets; • such wildlife sites are arguably the lowest level wildlife site designation and so while we thought it important that they were identified in the theme review, we felt that they wouldn't/shouldn't/couldn't have a bearing on shoreline management policies on an SMP-wide scale and hence we didn't therefore make mention of them in the main nature conservation chapter. <p>It could be argued that LNRs & RSPB reserves would fall into the same category; however, they were included in the nature conservation chapter.</p> <p>We will however, revisit this table, ensuring that we are consistent in our approach to identifying all statutory and non-statutory local sites of nature conservation interest.</p>	Revise table and update SEA.

4.7 Appendix F

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_115	Section F1 1st para reword the appendix outlines the key steps undertaken to identify policies...	Specific items to be reviewed and amended as appropriate.	Review & amend text.
EA Wales	Section 2nd para reword ... the assessment of policy scenarios; a string of policies together rather than considering a series of locations in isolation.	Specific items to be reviewed and amended as appropriate.	Review & amend text.
	Section F4 add definition of Key Policy Drivers (KPD) so acronym makes sense in subsequent tables.	Specific items to be reviewed and amended as appropriate.	Review & amend text.

4.8 Appendix G

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_115 EA Wales	Section G1 2nd para reword the development of the policy scenarios to test here have been previously described in Appendix F. So within this Appendix...	Specific items to be reviewed and amended as appropriate.	Review & amend text.
PCR_113 EA	We appreciate the large amount of work conducted to test the various policy scenarios along the coast. It is important that this objective analysis is applied, and seen to be applied, consistently across the SMP area. The choice of headline policy and associated descriptions must be consistent across the full SMP2 area. As the project team is aware, this consistency has been questioned by some stakeholders and will need to be addressed in the Consultation Report.	Specific items can be reviewed and amended as appropriate. However, although stakeholders have questioned consistency there are good reasons for there to be different descriptions due to differing situations with regard to coastal risk. The parts of Appendix G that document policies discussed with stakeholders cannot be modified where it is a record of what was done.	Consistency review on policy statement wording across whole SMP. Review & amend text as necessary.

4.9 Appendix H

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_115 EA Wales	Document provides good summary but:		No action proposed.
	- Has the economic appraisal (column "Broad-scale SMP review") only been conducted for the preferred policy? Do we know for example if MR Epochs 1-2-3 is cheaper/more expensive than HTL 1, MR 2&3?	Yes, see response to PCR_113 below. Any additional requirement would require further work.	
	- The sums are completed for the 100-yr period but can we have a break down on broad-scale spend profile i.e. frontages where HLT is proposed for Epochs 1-2-3, roughly which year between 0 and 100 is the bulk of the investment required? At Policy Unit but also Wales/sub-cell scale.	To develop additional tables giving policy unit level expenditure would require significant additional work.	No action proposed.
	- Can we (PMG) have a copy of the economic appraisal spreadsheets used for the analysis?	Detailed "PAG 3" type spreadsheets have not been used, so are not available. Much of the information used and results are summarised in appendix H. However, if there is specific further information required by PMG we can provide.	PMG to indicate specific requirements and Halcrow to provide.
	- Can we have a summary table showing total levels of anticipated investment required to deliver SMP2 policies in Wales/England and by sub-cell?	These can be provided.	Add summary tables to Appendix H.
	- Have WAG looked at this appendix and provided comments– prior to adoption, can they give the Welsh LAs and EAW reassurance that the money need to deliver the SMP2 policies in Wales is/will be there or realistic?	All documents have been available for review. WAG comments have been received through the QRG response.	LA & EAW to discuss with WAG prior to adoption.
PCR_113 EA	Appendix H – Economic Analysis presents the high-level economic analysis (B/C) for the preferred policy, but not for other policy scenarios considered. This should be included for transparency. Alternatively, it should be made clear that this information is available on request should stakeholders require further information.	<p>The national SMP guidance only requires us to broadly check the economic viability of the preferred policy:</p> <p>'The socio-economic status of the preferred policies should be appraised. Best available information should be used (e.g. existing coast defence strategies), however by using appropriate broad scale costs for defences and output from MDSF, new assessments for policies can be made (see Appendix C). The socio-economic assessment should address whether or not each policy is clearly economically viable; clearly not economically viable; or of marginal viability.</p> <p>We have not, therefore, looked at the economics for all options, and so do not have this information to make available. However, we could do something as additional work, but national guidance does not require this.</p>	No changes proposed.

4.10 Appendix I

Comments from?	Response	SMP2 Team Comments	Proposed Action
<p>PCR_212 CCW</p>	<p>We welcome the opportunity to comment on the NW England and N Wales SMP2 SEA Report.</p> <p>Our comments in respect of this SEA are made in the context of our role as a consultant body under the Environmental assessment of Plans and Programmes (Wales) Regulations 2004 and as advisors to the Welsh Assembly Government on matters pertaining to the natural heritage of Wales and its coastal waters.</p> <p>These comments should also be read in conjunction with our separate responses to the Shoreline Plan itself, sent by email on 17 Feb 2010, and our response to the Habitats Regulation Assessment component of this consultation contained in our letter dated 21 Jan 2010. We recognise that there has been an actively dialogue involving CCW and Natural England officers during the development of this document.</p> <p>In Appendix I, Table 8.1, the mitigation measures are expressed in fairly vague terms. As this plan could have significant adverse environmental effect on key nature conservation areas, this issue needs further attention.</p> <p>It is unclear from reading Appendix I, Table 8.2, whether the SEA is recommending that the SMP or other plans should resolve the issues which have been identified.</p> <p>In Section I.8.4 'Monitoring' it is unclear how the key identified monitoring activities will monitor the effective implementation of the SMP. We therefore look forward to commenting on the monitoring action plan as it develops.</p>	<p>Noted</p> <p>Comments will be addressed in conjunction.</p> <p>The mitigation measures are identified in Annex I to the SEA. However, greater detail will be provided on the identified mitigation measures (while ensuring that where possible, mitigation is identified for all receptors where adverse impacts are identified) in the tables in Annex I. Information on mitigation will be brought forward into the relevant tables in the SEA. Stronger statements will be made in the SEA ER, particularly where it is essential that mitigation measures are implemented to ensure that the impacts of the plan are environmentally acceptable. Mitigation relating to the provision of replacement, alternative or compensatory habitat cannot be confirmed until the conclusions of the Appropriate Assessment (i.e. the impacts of the policies on the European sites) have been agreed with Natural England and CCW. The Environment Agency has recently clarified that mitigation required by the SMP will be delivered through the developing Regional Habitat Creation Programmes (RHCP). We agree that this information is essential to the viability of the Plan and the text will be updated accordingly upon finalisation of the Appropriate Assessment.</p> <p>Further detail will be provided on monitoring activities to ensure effective implementation of the SEA.</p> <p>Further clarity will be provided on the issues and recommendations described in Table 8.2.</p> <p>SEA Summary of Secondary, Cumulative and Synergistic Issues – This is a way of identifying potential issues which could arise through the implementation of proposed policy, rather than proposing how they will be resolved. Maybe make it clearer that issues will be resolved at a lower strategy/scheme level.</p> <p>This needs to be clarified and monitoring plan will need to be consulted on.</p>	<p>None</p> <p>Read all comments together.</p> <p>Further explanation required.</p> <p>We will make stronger links to the Regional Habitat Creation Programme (RHCP).</p> <p>We will make this clearer and ensure that we consult on the monitoring plan.</p>

4.11 Appendix J

Comments from?	Responses	SMP2 Team Comments	Proposed Action
PCR_113 EA	Appendix J - Appropriate Assessment is hard to read on some computers due to its large file size and lack of a clear index or discernible structure. Area staff have suggested that it is either split into smaller sections or re-written to be more concise.	There could be some changes made to reduce the file size and improve ease of navigation.	Consider benefits of splitting the document into sub-cells, or reporting differently to make easier to read & reduce file sizes.
PCR_75 RSPB	<p>Matrix Tables for each sub-cell.</p> <p>Conservation Objectives – we note that these tables do not use the latest version - those included are the old-style objectives that predate the JNCC Common Standards Monitoring Guidance. This should be corrected.</p> <p>J1.4 Page 5:</p> <p>This sets out 5 bullet points on the application of the AA process, and which policies require AA.</p> <p>Areas for which the proposed policy is NAI and there is a naturally occurring defence are identified as not requiring AA (bullet point 1) – likewise those where the policy is NAI but there are no natural defences providing the previous policy was NAI as there will be no change (bullet point 3).</p> <p>We have raised concerns about this position in our earlier submissions. The continuation or adoption of an NAI policy does not necessarily mean there won't be an adverse affect - a policy of NAI against naturally high ground can still result in a coastal squeeze effect from sea level rise. If modelling carried out for the purposes of the SMP were to show that sea level rise would result in coastal squeeze against natural defences, then this places an Article 6(2) duty on the EA and Defra.</p> <p>We believe that the SMP should provide two outputs:</p> <p>1) Identification of Article 6(3) compensation requirements from policies that go through the AA process</p> <p>2) Where there is a policy of NAI against a natural defence, the SMP process could be used to identify coastal squeeze losses as a result of sea level rise and therefore identify Article 6(2) habitat creation needs.</p> <p>Article 6(2) responsibilities ultimately sit with Defra, and as the SMP2 will require Secretary of State sign-off, these must be addressed.</p>	<p>We requested the latest versions from NE during the development of the doc and have used what we received from them, in addition to web based sources where there were gaps.</p> <p>This is not considered to be a result of SMP implementation. Where there is a change in policy from the original SMP to the new SMP, this is a result of SMP implementation and the impacts have been identified and adequately assessed. This approach has been discussed and agreed with NE and CCW.</p> <p>As no adverse effect is currently concluded, compensation will only be needed if through review with NE and CCW an adverse impact was identified and the need for IROPI and therefore compensation was required.</p> <p>We could do more to outline potential generic impacts, but it's not the job of the SMP to resolve issues such as this when nothing is actively being proposed to change from what is currently occurring. We don't have sufficient info at SMP level to fully identify habitat losses and gains and any calculation would be estimates and info from RHCP will be required to do this.</p>	<p>We will ensure that latest available conservation objectives are used.</p> <p>None</p> <p>Further discussion required with RSPB</p> <p>None</p> <p>Further discussion required with NE/CCW</p>
	J2.1 The scoping matrix rules out likely significant effects from policy units that do not contain International sites, or are not adjacent or in close proximity to them. This fails to consider the wider coastal squeeze impacts on the system as a whole from HTL policies in these cells. (see J4.1 too). We are not convinced that all the policy units that could result in coastal squeeze impacts as a whole have been identified.	<p>It was decided through consultation with NE/CCW that this would be the approach. In consideration of "close proximity" reference needs to be made to the linkages identified in the baseline coastal process assessments. We will provide further clarification on this. We will review the draft assessments when updating for the final plan.</p> <p>Policy Units which do not contain, are not in close proximity or may be affected by proposed policies we deemed not to require HRA</p>	<p>Further discussion required with RSPB to see is we can further explain the reasons for this approach</p> <p>Revisit scoping for final version of plan.</p>
	J4.3 States that SMPs are high level policies and therefore difficult to determine exact effects that any proposal would have on the integrity of International Site and so, considered at this stage, it cannot state any definite adverse affects arising from SMP policies and that the detailed LSE and AA appendices will only be completed at scheme or project level. Whilst we agree that AA at individual scheme level is crucial, effort must be made to ascertain as much detail as possible at this strategic level. Where AA at the scheme level is required the SMP must commit to this, which it does (see page 4, J1.4). However, we are concerned that a default assessment of no adverse affect is being applied to the strategy level (see page 26). mitigation?	We need to discuss this further with statutory consultees as to the level of detail we can go into	Further discussion required

Comments from?	Responses	SMP2 Team Comments	Proposed Action
	<p>For example, it is stated that a HTL policy may result in coastal squeeze, potential 'preventative measures' (i.e. mitigation) such as beach recharge are identified, and it is then stated that other preventative measures relate to the requirement to ensure any potential effects on integrity of site features are fully considered - i.e. assess later at the strategy level. It then goes on to conclude that the strategy will have to demonstrate no adverse affect of the HTL policy and it is considered that such preventative measures as further assessment (which in itself cannot be considered a preventative measure) mean that it can be concluded that no adverse affects on integrity are anticipated at this stage. Where is the evidence that further studies and beach recharge are adequate mitigation?</p>	<p>Further studies and assessment at strategy/scheme level will be used to identify adequate mitigation. At SMP level the approaches to policies have been targeted to avoid adverse impacts, e.g. by proposing preventative measures, indicating that adverse impacts can be avoided.</p>	<p>Make this clearer, rather than the further studies etc are the mitigation – they will be used to develop the mitigation</p>
	<p>J5.1 In combination effects - page 18.</p> <p>This clearly states that only plans or projects that have the same affects as the SMP (i.e. coastal squeeze) have been considered, and that any other plans or projects that have differing effects would be more appropriately considered at the proposal stage. We would strongly disagree with this - the purpose of the in combination assessment is to assess the effects of all plans and projects on the interest features of the sites in question, not just those with 'the same type of effect'.</p> <p>There will be a whole host of other plans and projects that have the potential to interact with the SMP in terms of effects on interest features, eg offshore renewables, dredging, plans or projects resulting in direct habitat loss, etc etc. All plans or projects and their effects that it is possible to identify at this stage, must be considered.</p>	<p>We can look at other kinds of development plans, such as those that have been suggested</p>	<p>Do another review of relevant plans and policies and include those not only associated with activities that will have similar effects. Consult with statutory consultees for their input and knowledge of other plans and policies they may have</p>
<p>PCR_99 CCW</p>	<p>Thank you for giving the Countryside Council for Wales the opportunity to comment on the HRA proposals for the North West England and North Wales Shoreline Management Plan 2 (SMP2). Our comments are made in the context of our role as a consultant body under the Conservation (Natural Habitats &c) Regulations 1994 and as advisers to the Welsh Assembly Government on the natural heritage of Wales and its coastal waters. CCW welcomes and supports the efforts made by the Environment Agency, The NW Coastal Group and your consultants, in respect of this HRA process and looks forward to working closely with you on the implementation of the Shoreline Management Plan in the future. Our general comments follow below and detailed comments are contained in annex 1 attached.</p> <p>Please note that our comments are limited to those sites which lie wholly or partly within Wales and do not cover those sites which lie entirely within England. However, they should be read in conjunction with comments from Natural England as the issues raised may be relevant to the assessment as a whole. These comments should also be read in conjunction with our separate responses on the SEA and on the Plan itself.</p> <p>We note that this report is described as the “appropriate assessment” rather than a Habitats Regulations Appraisal (HRA). The Appropriate assessment only forms part of the HRA along with the “screening” and “test for likely significant effects”. We appreciate that these elements have been completed and consulted on separately but, for completeness, these initial stages of the assessment should also be included in this report.</p> <p>We understand and appreciate that this HRA has concentrated on the impacts of the proposed SMP2 policies on the European and international sites identified rather than project level impacts that may occur as a result of implementing those polices. We also appreciate that the level of detail that can be considered as part of a plan level assessment is not the same as would be the case for a project level appraisal. However, we must emphasise that this assessment must still address the potential adverse effects as far as is practicable before deferring assessment down to the project level. It should also show that the three prerequisites for deferment are met before adopting this approach; these are that it is not possible for the plan to determine the effects at this level, that the lower tier plan or project is subject to HRA through legislation or policy and that the Plan is capable of being amended subject to the findings of the more detailed assessment. We welcome, therefore, the firm recommendation that there will be a need to carry out more detailed, project level, HRAs on the coastal flood risk strategies and scheme proposals and specific SMP2 policies will only be implemented subsequent to the findings of those assessments.</p> <p>There appears to be some confusion in the Report over the difference between mitigation measures and compensation measures. Mitigation and avoidance measures will prevent any likely significant effects from manifesting themselves as adverse effects, thus enabling site integrity to be maintained (as defined by the</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>This could be changed and the additional information incorporated</p> <p>We could go through the report and identify where at all possible any potential adverse effects could be identified. Incorporate the 3 pre-requisites that should be met before adopting the approach.</p> <p>We should make firmer recommendations that more detailed HRA is undertaken for strategies/schemes and policy implementation is only undertaken following the satisfaction of these proposals</p> <p>We agree the terminology is incorrectly used in places, and the assessment should generally have said referred to avoidance or mitigation. We will ensure mitigation/compensation terminology is</p>	<p>None</p> <p>None</p> <p>None</p> <p>We could change the report title to reflect that it covers the HRA, not just AA and additional information will be incorporated</p> <p>Identify potential adverse effects at high level and detail approach more comprehensively</p> <p>Add these recommendations and firm up on policy implementation</p> <p>Review the document to ensure that these terms are correctly used</p>

Comments from?	Responses	SMP2 Team Comments	Proposed Action
	<p>Sites' conservation objectives). Compensation implies that an adverse effect will occur and site integrity will be compromised (for example, the loss of inter-tidal habitat as result of coastal squeeze and its replacement outside the site boundary). Mitigation should be considered as part of the appropriate assessment process and included with the outcomes and recommendations. Compensation forms part of the consideration for any case for Imperative Reasons of Over-riding Public Interest (IROPI) which is put forward and must not be considered as part of the appropriate assessment. There are numerous points within this Assessment where "compensation" is referred to and the implication is that features within the sites are likely to be compromised by the implementation of a certain policy (subject to more detailed assessment) and that alternative habitat will need to be created.</p> <p>This may be simply confusion of terminology and the references to "compensation" actually should read "mitigation", but this needs to be clarified as a matter of some urgency.</p> <p>Given these concerns, CCW feel that the assessment needs further clarification before we can fully concur with an assessment of "no adverse effects". These particularly relate to issues of mitigation and compensation outlined above, but there are also a number of potential effects in combination with other plans, policies and programmes that need to be further considered or, if already considered, then a more comprehensive rationale for their exclusion included.</p> <p>It may be possible to resolve many of the points raised by clarifying the methodology or text but as it currently stands we feel that this HRA appropriate assessment is not completely consistent with other SMP2s being developed and contains some significant discrepancies that may leave it open to challenge. We have copied this letter to Peter Jones at the Welsh Assembly Government (WAG) because of our understanding that WAG is the competent authority for this plan in Wales.</p>	<p>correctly used</p> <p>Need to go through the assessment and address consultees comments where valid and consult with them to determine whether the conclusions are correct</p> <p>We need to work with consultees to clarify points raised Noted & we will revise Section J1.2 as appropriate.</p>	<p>Further liaison and discussion with CCW/NE is required to find out whether determinations are correct and can be agreed upon</p> <p>Further discussion as part of a meeting/workshop required</p> <p>Amend competent authority as appropriate</p>
	<p>Please note, these comments are limited to those sites which lie wholly or partly within Wales and do not cover the sites which lie entirely within England. However, they should be read in conjunction with comments from Natural England as the issues raised may be relevant to the assessment as a whole. These comments should also be read in conjunction with our separate responses on the SEA and on the Plan itself.</p> <p>J1.2 background</p> <p>It should be noted that while the Environment Agency may act as the lead competent authority for the SMP2 process for plans that are "cross border" between England and Wales, the Welsh Assembly Government are the Competent Authority with respect to those elements of the SMP2 that lie within Wales at the current time.</p>	<p>Noted</p> <p>Noted</p>	<p>None</p> <p>Ensure that this is made clear within this section</p>
	<p>J1.3 Requirement for Appropriate Assessment</p> <p>While it is not incorrect to refer to the appropriate assessment of the plan under the Habitats Regulations or specifically to Regulation 48, you should note that the appropriate assessment is just one element of the overall Habitats Regulation Assessment (HRA). The full assessment, as noted in the text, includes a screening stage (identification of sites and test for likely significant effect) which may or may not lead to the need for an appropriate assessment of the plan and there may be additional stages depending on the outcome of the appropriate assessment. Regulation 85 (as amended) relates specifically to land use plans and may be of more relevance in this context. We note and support the rationale for progressing the Plan to the appropriate assessment stage.</p>	<p>Noted</p>	<p>The text will be amended to reflect this</p>
	<p>J1.4 Appropriate Assessment Procedure</p> <p>We note the decision to screen out policy units which do not have a material boundary with an international or European site. While we understand the argument in relation to the requirement for specific projects and schemes to undergo further HRA assessments and that potential effects from actions carried out in such policy units are less likely to have direct effects on spatially distant sites, it is important to remember that the policy applied to any particular cell can have cumulative, indirect and in combination effects some of which could impact on sites a considerable distance away. For example, an "advance the line" policy could affect flow patterns or sediment processes across a much wider coastal process unit than the individual policy unit. It is the function of a high tier plan such as the SMP2 to at least identify the potential for such effects to occur and ensure that any later decisions based on project level assessments are</p>	<p>Agreed</p>	<p>We will look at this in further detail</p>

Comments from?	Responses	SMP2 Team Comments	Proposed Action
	<p>fully informed and not unreasonably constrained by the policy proposals set down within the SMP2.</p> <p>We note the additional clarification given in section J4.2 that efforts were made to ensure that policy units were also “discreet spatial units” and that “impacts [within the unit] would be largely confined to that policy unit” but we feel that further clarification is required of the meaning of “largely” and “adjacent” in the context of the potential impacts of these excluded policy units on the identified sites. As it currently stands, we are uncertain if this is sufficiently robust to provide a “generic” screening but it may be acceptable if individual policy units were evaluated in this way if only in to confirm the lack of potential cumulative and indirect effects.</p> <p>They should also be considered for the potential impacts “in combination” with other plans, policies and programmes and the SMP2 itself should contain suitable policies to deal with this level of uncertainty.</p> <p>We also note that policy units where “no active intervention” (NAI) is being proposed, and this was the case previously, have been screened out in line with Commission rulings relating to Flood Management Plans. While we do not necessarily disagree with this, providing the NAI policy is being consistently applied across the three epochs, but there may be wider implications that should be considered by the assessment, such as the potential for such areas to be used as mitigation or even compensation should there be a case made for Imperative Reasons of Over-riding Public Interest (IROPI) in relation to other policy units.</p>	<p>Further explanation of this is required. This requires cross-referencing to the coastal processes assessments in Appendix C, the policy scenario development in Appendix G and the use of Policy Areas.</p> <p>This need further discussion</p> <p>Agreed</p>	<p>We will provide further information regarding how the units are discreet and how they have been divided in that way</p> <p>Discuss this further with consultees</p> <p>Maybe we could incorporate a clause that where areas had been identified as compensatory areas where NAI was proposed, the Policy could be changed in order to protect these areas?</p>
J2.1	See comments on J1.4 in relation to screening out specific policy units.	Noted	Further clarification will be added into this section too.
J2.3	We welcome the consideration of avoidance and mitigation measures within this assessment.	Noted	None
J2.4	The Regulations clearly set out the process for making a case for IROPI if the Plan authors feel that a policy must be implemented, regardless of the adverse effects that may occur on the site(s). The first element of this process is to confirm there are no alternatives to the proposals followed by a number of other steps which may differ depending on whether a priority habitat or species is present, and often involve a lengthy process to identify the availability of adequate compensation measures. Finally, it should be noted that the ultimate decision on whether there is a case for IROPI does not lie with the competent authorities but with Westminster or the Assembly and ultimately the Commission. The complexity of this process should not be underestimated and this Assessment should make this clear.	Noted	Following discussions with NE and CCW and based on the agreements we come to, we will need to be clearer about the case for IROPI, if at all needed
J2.5	We welcome the additional studies (CETaSS) being carried out to inform lower tier assessments of projects and schemes.	Noted	None
J4.1			
J4.2	See comments on J1.4 in relation to screening out specific policy units.	Noted	Add further clarification
J4.3	We note your conclusion that there is insufficient information, at this stage, to determine whether the NEW and NW SMP2 will have adverse effects on the international and European sites identified and, therefore, the intention to defer detailed assessment to the project and scheme level. This is not an ideal situation, as the guidance is clear that where it can not be ascertained that a plan will not have an adverse effect on site integrity then that plan must not progress to adoption. However, it may be an acceptable approach providing certain conditions can be met. Firstly, it must be clear that this appraisal can not reasonably assess the effects of the SMP2 on the identified sites in a meaningful way. Secondly, the assessment of the lower tier plans/projects (the detailed scheme HRAs) must be able to change the nature,	Noted. In a similar way to the SMP assessment being undertaken now, EA policy is for strategies to also go through HRA.	We will see if these conditions can be met to clarify the approach

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	<p>scale and/or location of the proposals so that adverse effects can be avoided. These assessments, therefore, must not be constrained by location specific policies in the SMP2.</p> <p>Finally, the assessment of the lower-tier plan or project must be either legally required or will be carried out as a matter of policy. It is clear that some of the proposed policies for certain cells clearly have the potential to have adverse effects and, and given the nature of the SMP2 process, strong caveats must be included in the Plan to ensure that projects will not be constrained in how much they can alter the policy at the detailed scheme design/implementation stage. See comments below for discussion of specific policy units.</p>		
	<p>J5.1</p> <p>We welcome the comprehensive list of plans and projects that have been considered in this element of the assessment. However, we are disappointed that a number of significant strategic policy documents relevant to North East Wales do not appear to have been considered, such as the National and Regional Transport Plans, NE Regional Waste strategies, Wales Spatial Plan and detailed NE Wales Spatial Plan Areas and the relevant Environment Agency strategic documents such as Catchment Flood-risk Management Strategies (CFMPs) and the Dee River Basin Management Plan, though we note that the CFMPs have been included in the discussion in section J6.3.</p>	Noted	We should look at these strategic policy documents to see how they could potentially act in combination with the SMP
	<p>J6.1.1 Sub Cell 11a (a) Llandudno</p> <p>We note that “coastal squeeze” has been identified as a potential impact leading to adverse effects on a number of sub-tidal and inter-tidal features in the Menai Strait and Conway Bay SAC. We also note that the terrestrial features of the Great Ormes Head SAC are unlikely to be adversely affected by the policy proposals. While CCW would potentially welcome the use of soft engineering options as alternatives to hard coastal defences in certain areas of this policy cell, these may also have their own impacts on the site features and would require more detailed appraisal before being carried out and, therefore, their use as a potential mitigation measure needs to be qualified. Also, while we welcome and support the clear recommendation that more detailed strategic and project level HRA will be required to “explore the practicality and feasibility of this policy option”, it should be noted that this is not a mitigation or avoidance measure but a requirement of the process due to the level of uncertainty in the assessment.</p> <p>We do welcome the acceptance that the more detailed strategy will need to demonstrate no adverse effect before this policy can be implemented, but have some reservations over the ability of the preventative measures identified to effectively prevent the impacts of coastal squeeze should they be identified as a result of the more detailed assessments. Therefore, we feel the conclusion of “no adverse effects” may be a little premature.</p>	Noted	We need to further discuss this with consultees
	<p>J6.1.1 Sub Cell 11a (b) Point of Ayr to Mostyn, south of Mostyn Dock</p> <p>We note that “coastal squeeze” has been identified as a potential impact leading to adverse effects on a number of sub-tidal and inter-tidal habitats and bird features of the Dee Estuary SPA, Dee Estuary Ramsar Site and Dee Estuary SAC (please note that all these sites are now fully designated or classified). We also note that there are no adverse effects identified for the two lamprey species features. While CCW welcomes and supports the clear recommendation that more detailed strategic and project level HRA will be required to “explore the practicality and feasibility of this policy option”, it should be noted that this is not a mitigation or avoidance measure but a requirement of the process due to the level of uncertainty in the assessment. We also welcome the acceptance that the more detailed strategy will need to demonstrate no adverse effect before this policy can be implemented, and support the recommendation to develop a long term monitoring programme and Estuary wide habitat creation plan.</p> <p>However, we have some reservations over the ability of the preventative measures identified to effectively prevent the impacts of coastal squeeze should they be identified as a result of the more detailed assessments, particularly as the assessment itself identifies the likely need for new habitat creation. Therefore, despite the positive sedimentation environment of the Dee Estuary, we feel the conclusion of “no adverse effects” may still be a little premature.</p>	Noted	We need to further discuss this with consultees
	<p>J6.1.1 Sub Cell 11a (c) Mostyn to Flint Marsh</p>		We need to further discuss this with consultees

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	<p>CCW understand that this policy unit has different policy option proposals for the three epochs with managed retreat proposed for the medium and long term. We note that “coastal squeeze” has been identified as a potential impact leading to adverse effects on a number of sub-tidal and inter-tidal habitats and bird features of the Dee Estuary SPA, Dee Estuary Ramsar Site and Dee Estuary SAC (please note that all these sites are now fully designated or classified). We also note that there are no adverse effects identified for the two lamprey species features. While CCW welcomes and supports the clear recommendation that more detailed strategic and project level HRA will be required to “explore the practicality and feasibility of this policy option”, it should be noted that this is not a mitigation or avoidance measure but a requirement of the process due to the level of uncertainty in the assessment.</p> <p>We also welcome the acceptance that the more detailed strategy will need to demonstrate no adverse effect before this policy can be implemented, and the potential to use the managed retreat option as a potential mechanism to provide compensatory habitat both within this unit and from within the wider estuary. We note that there may also be a number of issues with this option in terms of contaminated land and these should be fully assessed at the strategic and project levels. However, we have some reservations over the ability of the preventative measures identified to effectively mitigate the impacts of coastal squeeze should they be identified as a result of the more detailed assessments, particularly as the assessment itself identifies the likely need for new compensatory habitat creation. Therefore, despite the positive sedimentation environment of the Dee Estuary, we feel the conclusion of “no adverse effects” may still be a little premature.</p>	Noted	
	<p>J6.1.1 Sub Cell 11a (d) Flint Marsh to Chester Weir to Sealand Rifle Range (inner Dee Estuary, both banks)</p> <p>CCW appreciate that this policy unit has a higher degree of uncertainty associated with than some of the others but note that while managed retreat is being considered as a potential option in the medium to long term time period, the recommended policy for the three epochs is hold the line. We note that “coastal squeeze” has been identified as a potential impact leading to adverse effects on a number of sub-tidal and inter-tidal habitats and bird features of the Dee Estuary SPA, Dee Estuary Ramsar Site (please note that these sites are now fully designated or classified), Dee Estuary SAC and river Dee and Bala Lake SAC. We also note that there are no adverse effects identified for the two lamprey or Atlantic salmon species features or River habitat feature. We would welcome further study into the potential for habitat creation in this cell if managed retreat is proposed in future. While CCW welcomes and supports the clear recommendation that more detailed strategic and project level HRA will be required to “explore the practicality and feasibility of this policy option”, it should be noted that this is not a mitigation or avoidance measure but a requirement of the process due to the level of uncertainty in the assessment.</p> <p>We also welcome the acceptance that the more detailed strategy will need to demonstrate no adverse effect before this policy can be implemented, and the potential to use the managed retreat option as a potential mechanism to provide compensatory habitat both within this unit and from within the wider estuary. We note that there may also be a number of issues with this option in terms of contaminated land and implications for the navigable channel of the Dee and these will need to be fully assessed at the strategic and project levels. However, we have some reservations over the ability of the preventative measures identified to effectively mitigate the impacts of coastal squeeze should they be identified as a result of the more detailed assessments. It is possible that if a managed retreat option is adopted then mitigation could be carried out as outlined, but if a hold the line policy is maintained for the three epochs then the assessment itself identifies that new compensatory habitat creation will need to be considered. Therefore, despite the positive sedimentation environment of the Dee Estuary, we feel the conclusion of “no adverse effects” may still be a little premature.</p>	Noted	We need to further discuss this with consultees
	<p>J6.1.1 Sub Cell 11a policy units e – l.</p> <p>These policy units do not lie within Wales but have the potential to impact on cross-border sites (the Dee Estuary SAC, SPA and Ramsar and/or Liverpool bay pSPA). Any mitigation measures proposed as a result of these policy proposals must take into account the impact on the sites as a whole and we welcome the recommendation made to develop and implement a holistic strategy for the Dee Estuary and the wider sub cell. As outlined above, while we welcome and support the intention to carry out additional strategic and policy level HRAs and to make the detailed implementation of the policy dependent on the outcomes of</p>	Noted	We need to further discuss this with consultees and the requirement for IROPI if conclusion needs to be changed

Comments from?	Responses	SMP2 Team Comments	Proposed Action
	<p>these assessments, this should not be regarded as mitigation. In addition, if loss of habitats does occur as a result of the policy proposals and this can not be mitigated or avoided then the alternatives proposed, in terms of replacement habitat creation, would be compensation (ie adverse effects have not been avoided) and would need to be considered as part of any case for IROPI that may be put forward.</p> <p>As the assessment currently stands, with the exception of those units where a NAI option is proposed, we think it is premature to conclude that there will be no adverse effects as a result of these policy options.</p>		
	<p>Table 4 sub cell 11a – Summary of “in combination” impacts on international sites.</p> <p>We are somewhat confused by this table which appears to summarise the cumulative effects of the proposed SMP2 policies on the designated sites and possible mitigation and compensation measures rather than an assessment of any effects in combination with other plans and programmes and projects. We assume that this is a mislabelling of the table and therefore refer to our comments above in relation to the cumulative effects identified.</p>	<p>It is cumulative effects between sites, rather than in combination with other plans and programmes</p>	<p>This table will be re-named</p>
	<p>J6.3 In combination</p> <p>See also our comments on section J5.1. We note that the only plan identified with the potential for “in combination” effects with the NWE and NW SMP2 is the River Dee CFMP. We do not fully understand the arguments made as to why the SMP2 policies will not lead to in combination effects with the CFMP policies. While we appreciate that the SMP2 is concerned with coastal flooding and the CFMP with fluvial flooding, there is a considerable crossover when considering effects, particularly where the tidal sections of rivers are concerned, and this is acknowledged in the narrative itself. There is clear potential for policies and proposals within the CFMP to have “in combination” effects with the SMP2 on the integrity of the European and international sites identified. For example, maintaining or enhancing fluvial defences might only lead to minimal losses of the habitats identified in J6.1 but when combined with losses due to coastal squeeze resulting from similar policies within the SMP2 then an overall adverse effect could manifest itself.</p> <p>We appreciate that the report identifies this uncertainty and recommends further study is required to ascertain what the consequences might be, but we would welcome further clarification on the conclusion that no policies have the potential to lead to an “in combination” effect, particularly given the report then goes on to state that; “there is the potential for some of the proposals of the NWE&NW SMP2 to have in combination effects with the River Dee CFMP” in the next paragraph.</p> <p>We also are somewhat surprised that, given the number of significant infrastructure elements that run along the North Wales coast and Dee Estuary, and identified in this SMP2, that none of the relevant regional policy documents, strategic plans or local development documents have been included, or if included, have been found to have no potential “in combination” effects. We would have anticipated that the regional transport plans and proposals relating to coastal development and ports would have at least some potential effects in combination with the NWE&NW SMP2 and it may be useful to clarify why this was found not to be not the case.</p>	<p>Noted</p> <p>We will need to address this in discussion with NE/CCW</p> <p>Noted</p>	<p>Further explanation and clarification can be added</p> <p>This can be changed if deemed necessary through consultation</p> <p>We can look further into plans and policies</p>
	<p>J7.1 Summary</p> <p>We note that the final paragraph of the summary only mentions that appropriate mitigation and /or improvements leads to an overall conclusion of no adverse effects. This is not consistent with the rest of the report. As stated in our comments above, it is possible that mitigation (and avoidance) measures may enable any adverse effects identified to be avoided. However, this HRA identifies both high levels of uncertainty and the likely requirement to compensate for impacts on features that will be lost as result of coastal squeeze caused by the implementation of the policies. It is accepted that in many cases uncertainty is such that the high tier plan can not ascertain whether there will be an adverse effect and that, given certain provisos, the assessment can be deferred to lower tier assessments.</p> <p>We note that this argument is used extensively in this report and welcome and support the clear recommendations for strategy and project level assessments to be carried out and policies to be implemented only when the findings of such assessments are known. This is not mitigation, however, but an acknowledgement that the assessment has not been able to ascertain “no adverse effects”. It is possible for the plan to proceed in this situation but it must do so with a clear understanding of the implications of</p>	<p>Noted</p> <p>Noted</p>	<p>This needs further discussion with NE and CCW</p> <p>We need to make the implications clear if the plan proceeds in this way</p>

Comments from?	Responses	SMP2 Team Comments	Proposed Action
	<p>deferring the assessment.</p> <p>There also appear to be some confusion over the difference between mitigation measures and compensation measures. Mitigation and avoidance measures will prevent any likely significant effects from manifesting themselves as adverse effects, thus enabling site integrity to be maintained (as defined by the sites' conservation objectives). Compensation implies that an adverse effect will occur and site integrity will be compromised (for example the loss of inter-tidal habitat as result of coastal squeeze and it's replacement outside the site boundary). Mitigation should be considered as part of the appropriate assessment process and included with the outcomes and recommendations. Compensation must not be considered as part of the assessment and should only be considered once the case for IROPI has been made (Regulation 53 or Regulation 85C of the amended Regulations). There are numerous points within this Assessment where "compensation" is referred to and the implication is that features within the sites are likely to be compromised by the implementation of a certain policy (subject to more detailed assessment) and that alternative habitat will need to be created</p> <p>This may be simply be confusion of terminology and all references to "compensation" actually mean to refer to "mitigation" but this should be clarified as a matter of urgency as it currently leaves this assessment, and therefore the SMP2 itself open to challenge.</p>	<p>Need to ensure mitigation/compensation terminology is correctly used</p>	<p>Review the document to ensure that these terms are correctly used</p>
	<p>J7.2 Conclusion</p> <p>See comments above. We understand and appreciate that this HRA has concentrated on the impacts of the proposed SMP2 policies on the European and international sites identified rather than project level impacts that may occur as a result of implementing those polices. We also appreciate that the level of detail that can be considered as part of a plan level assessment is not the same as would be the case for a project level appraisal. However, we must emphasise that this assessment must still address the potential adverse effects as far as is practicable before deferring assessment down to the project level. It should also show that the three conditions for deferment are met before adopting this approach; these are that it is not possible for the plan to determine the effects at this level, that the lower tier plan or project is subject to HRA through legislation or policy and that the Plan is capable of being amended subject to the findings of the more detailed assessment. We welcome, therefore, the firm recommendation that there will be a need to carry out more detailed, project level, HRAs on specific development proposals and specific policies will only be implemented subsequent to the findings of those assessments.</p> <p>We do, however, feel that the assessment needs further clarification before we can fully concur with an assessment of no adverse effects. These particularly relate to issues of mitigation and compensation but there are also a number of effects in combination with other plans, policies and programmes that need to be further considered or, if already considered, then a more comprehensive rationale for their exclusion included. It may be possible to resolve many of the points raised by clarifying the methodology or text but as it currently stands we feel that this HRA appropriate assessment is not completely consistent with other SMP2s being developed and contains some significant discrepancies that may leave it open to challenge.</p>	<p>We could go through the report and identify where at all possible any potential adverse effects could be identified. Incorporate the 3 pre-requisites that should be met before adopting the approach.</p>	<p>Identify potential adverse effects at high level and detail approach more comprehensively</p>
<p>PCR_174 Natural England</p>	<p>North West England and North Wales Shoreline Management Plan 2 (SMP2) – Consultation on Habitats Regulations Assessment (HRA) 'Appropriate Assessment'</p> <p>Thank you for giving Natural England the opportunity to comment on the HRA proposal for the North West England North Wales Shoreline Management Plan (SMP2). Our comments are made in the context of our role as a Competent Authority under Regulation 48 of the Habitats Regulations 1994.</p> <p>Please note that our comments should be read in conjunction with those from the Countryside Council for Wales as the issues raised may be relevant to the assessment for the whole of Cell I I.</p> <p>We note that there is a need in the report to clarify the difference between 'mitigation' and 'compensation', both in terms of their definitions and their relative roles in the process of managing impacts on a site.</p> <p>The EC Guidance Paper on Article 6 (4) identifies Mitigation measures as 'Those that aim to minimise or even cancel, the negative impacts on a site that are likely to arise as a result of the implementation of the plan or project'. Mitigation should be considered part of the Appropriate Assessment process and included with the outcomes and recommendations. Compensatory measures are independent of the plan or project</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Need to ensure mitigation/compensation terminology is correctly used</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p> <p>Review the document to ensure that these terms are correctly used</p>

Comments from?	Responses	SMP2 Team Comments	Proposed Action
	<p>(including any mitigation measures). They are intended to offset the negative impacts of the plan or project so that the overall ecological coherence of the natures 2000 network is maintained.</p> <p>Compensation should only be implemented in the event the proposed plan or project for the site must be undertaken for imperative reasons for overriding public interest; in spite of a negative assessment of the implications for the site.</p> <p>Compensatory measures are independent of the plan or project (including any mitigation measures). They are intended to offset the negative impacts of the plan or project so that the overall ecological coherence of the natures 2000 network is maintained.</p> <p>Compensation should only be implemented in the event the proposed plan or project for the site must be undertaken for imperative reasons for overriding public interest; in spite of a negative assessment of the implications for the site.</p> <p>With reference to J6 1.2 Sub Cell 11b section H (Hutton Marsh), it is stated that private upgrading of sea defences has caused some parts of the SPA to be in unfavourable condition and that it should be brought back under tidal influence. It may be necessary to refer to the timing of the upgraded work and the designation, to ensure that any work to bring the area under tidal influence is carried out in line with the conservation objectives of the site.</p> <p>Natural England feel that due to its proximity to the coast, the Duddon Mosses SAC should be considered for inclusion in the Appropriate Assessment process.</p> <p>It is noted that on several occasions in the Strategic Environmental Assessment document that the impacts of the proposed policies are currently uncertain. Clarification of how these impacts are being identified, an indication of their severity and a proposed timetable of impact and associated management would be beneficial. Natural England would also like to have clarified how these factors have been integrated into the Habitats Regulations Assessment.</p> <p>Regarding the Water Framework Directive assessment, Natural England acknowledge that the majority of Management Areas in North West England and North Wales SMP2 area bodies will not see deterioration in Ecological Status or Potential of the water bodies and therefore there will not fail the WFD Environmental Objectives. Further to this, areas where the preferred policy options have the potential to fail in meeting the WFD policies, justification for policy selection, the necessity for monitoring, and mitigation measures have been identified. Natural England would like to take the opportunity to reinforce the need for any flood risk strategy to account for coastal processes, continued monitoring, and sign up to mitigation measures suggested within the SMP2 process.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>It can be included</p>

4.12 Appendix K

Comments from?	Responses	SMP2 Team Comments	Proposed Action
PCR_115 EA Wales	In general, the assessment is good, covering everything as set out in the guidance. The glossary section at the front is very useful.	Noted.	
	I think a section needs to be included about other Environmental Designations, relating them to the WFD as in the guidance - 'Where there are sites protected under other EU legislation (such as the Birds or Habitats Directive), the Directive aims for compliance with any relevant standards or objectives for these sites. Therefore where a site which is water dependant in some way is protected via designation under another EU Directive and the Good Ecological Status/Potential targets set under the Directive would be insufficient to meet the objectives of the other relevant environmental Directives, the more stringent targets would apply.'	Noted.	Consider adding a section into the appendix
	Is this a retrospective assessment (apologies for my ignorance) - if it is I think this needs to be explained. It may be useful to state when, during the SMP process, it was started.	Yes this assessment has essentially been retrospective.	Add in words to say what stage the WFD was undertaken
	I like the way the rivers have been included (even if they weren't assessed), it was good to provide details of the methodology for this thinking.	Noted.	
	It may be useful to have more maps showing the location of other waterbodies - there is only one showing the Coastal and Transitional waterbodies - I think the colour coding of these waterbodies needs to be translated to the Assessment Tables (or vice versa) as it is slightly confusing as to what they correspond to in the Tables. A Groundwater location map would be useful.	Noted.	Consider revising maps and the need for additional maps
	The management units that fail the WFD should be highlighted more in the tables, maybe just colour in the column where it fails (with the 'x' in) in red to highlight it.	Noted.	Consider making changes to the table
	A map would be good to show the management units that fail, to show this in a more pictorial way.	Noted.	Consider revisions to the appendix
PCR_75 RSPB	<p>We welcome the inclusion of the WFD objectives assessment, however we are concerned that the mitigation measures proposed appear to be restricted to those in the River Basin Management Plans. Monitoring in itself cannot be considered to be a mitigation measure as in itself it makes no provision for what happens if this monitoring shows deterioration is occurring. Article 4.7 of the Water Framework Directive (2000/60/EC) states that environmentally better options must be examined before proposals that could cause waterbody deterioration can be brought forward. The key consideration in the choice of environmentally better options in this instance is the potential impacts on Natura 2000 sites and clearer links must be made between the Appropriate Assessment of this plan for the requirements of the habitats directive and the WFD assessment. It must be made clearer which environmentally better options have been considered and how the conclusions from the WFD report have been taken into account in the main SMP document.</p> <p>We note in the Discussion and Conclusions section that several Units are identified where the SMP2 may impact on WFD objectives for the waterbodies concerned.</p> <p>For Units 11c 2.3/2.4, 11c 7.1/7.3 and 11a 7.4/7.6, we have made comments supporting the proposed preferred policies. Clearly, this support would be subject to the comments made above in relation to Natura 2000 sites and WFD objectives at these locations.</p>	<p>Response is noted.</p> <p>Support has been noted.</p>	<p>Clarify monitoring actions and review mitigation proposals when taking into account all consultation responses.</p> <p>Improve links between the AA and WFD when finalising the appendices and main report.</p>

4.13 Appendix L

Response from?	Response	SMP2 Team Comments	Proposed Action
PCR_115 EA Wales	L2: Would this be more useful as a metadata table – so we know the dates of the datasets (which would be useful for future studies)?	The data collection phase of the SMP2 took place in 2008 and we suggest that by the time further studies take place some of the data will have been superseded. So we are not sure further work to develop this would be worthwhile.	No action required.