

SMP Title		SMP No 4 - 2d Gibraltar Point to Hunstanton (The Wash)				Lead Contact:	Onos Iboje	Reviewers			1. Steve Jenkinson	Environment Agency				
Flood & Coastal Risk Manager	David Hawley (Northern) Peta Denham (central)	Approval Required by Regional Director		Paul Woodcock	Lead Authority:	Environment Agency	2. Jim Hutchison				Environment Agency					
Website	www.environment-agency.gov.uk/research/planning/105014.aspx	Region:	Anglian	3. Liz Galloway			Environment Agency									
Item Number	Showstopper per	Date Matter raised	Criteria Heading	Criteria sub heading	Document Reference	Comment	Action Required				Comment provided by:	Date Response Provided	Response	Section Amended (New para nos and Table nos used in this column)	Review of Response	Comment provided by:
1.1		21-Dec-09	Technical	Baseline Scenarios & Policy Options	PDZ1 and Epoch 1	There are statements in relation to relic defences and improvements having a limited life. It is not clear where these relic defences are in relation to those maintained today.	Can the LA show on a map where all the various defences are in the Wash area.  Are the relic defences able to be used as a defence without any gaps? Is the use of planning legislation and temporary defences of any value in such cases?	Jim Hutchison	11-Feb-10	Fig. E3.5 shows these, they have played a role in appraisal and were extensively discussed with EMF and CSG. Conclusion: currently not in a state to be used as defences; Action Plan will flag up need to study role and relevance. Will suggest to CSG to add reference in main doc to Fig E3.5.		QRG Review continues on next line in column G				
1.2		26-May-10				Any amendments made? The locations are still not clear and I suspect this is because of the scale of the figure, and suggest that the defences as set out in NFCD is provided in another format. If this can be done, then this will satisfy my concerns. Not satisfied.	indicate defences in another way for clarity.	Jim Hutchison	26-Aug-10	Figure E3.5 has been updated and includes an inset figure to show the area of the Wash with secondary defences in more detail.	Figure E3.5, page E54 of Appendix E has been updated	Satisfied	Jim Hutchison	13-Sep-10		
2		21-Dec-09	Technical	Baseline Scenarios & Policy Options	Main Document, Page 24	How has human intervention enhanced the ongoing large-scale natural process of accretion? Section 2.1.2 and 2.1.4 infers that land reclamation has resulted in narrowing/lowering of the intertidal mudflats/saltmarsh seawards of the embankments.	Please clarify in text.	Andy Parsons	11-Feb-10	Reclamation has of course resulted directly in narrowing of intertidal area, but not lowering (don't see where 2.1.2 and 2.1.4 infer this). The line on page 24 refers to the fact that reclamation is typically followed by enhanced rates of accretion until the large scale dynamic equilibrium intertidal width is restored. See section M6.3.1 in the AA. Suggest to add a few words to main doc to explain and refer to M6.3.1.		Satisfied	Andy Parsons	26-May-10		
3.1	Showstopper	21-Dec-09	Technical	Baseline Scenarios & Policy Options	Page 66 Land Use, page 58 PDZ1	Managed Realignment (MR) in PDZ1 is ruled out due to the need to sustain current agricultural Land Use yet leads to a fall in terms of the Habitats Regulations. However, the plan assesses that MR to mitigate for coastal squeeze of habitats would lose only 3% of Grade 1 and 2 agricultural land. This compares to 38% of Grade 1 land currently used for non-food production - bulbs and flowers. It is not clear if this impact is being taken as a national food security issue or local/regional economic issue.	Ensure that impacts on, in particular, designated and Biodiversity Action Plan (BAP) habitats are not being determined on purely economic grounds as opposed to those of genuine over-riding public interest. Inform and amend (AA) Appropriate Assessment as required. Consider rewording Plan's appraisal objectives for example to "protect as much grade 1 and 2 land used in food production as practical and necessary".	Julian Payne	11-Feb-10	The draft SMP does not rule out MR in PDZ1 (and the EMF agreed change in wording even makes it the 'firm' policy in an erosional future). Issue of food security has been key to policy development in discussion with all partners, and it has been agreed that the importance of the issue plus the uncertainty surrounding future food security warrant the chosen approach.		QRG Review continues on next line in column G				
3.2		26-May-10						A tough problem, and on reflection a policy of HTL/MR to be determined with further review is no doubt the most pragmatic approach at this time. Dealing with this sensitive issue can not have been helped by the interpretation of the Habitat's Regulations whereby a MR policy specifically aimed at allowing the natural evolution and retention of mudflats and saltmarsh is taken as having an adverse impact on their integrity just because future conditions (outside the influence of the plan) will prevent this from being located where today's SAC's line on a map has been drawn. Clearly it was not the intent of the directive for policies that allow the natural evolution of Natura sites to be considered as having a negative impact - but this interpretation is one the Steering Group no doubt has had applied from outside.	Actions relating to resolution of HTL/MR (1.3, 1.5, 1.7 and 1.1.2) need to have clear delivery dates, milestones and target criteria. Also there should be an action (subject to outcomes of 1.3, 1.5, 1.7 and 1.1.2) to deliver MR or to provide compensatory habitat. These are needed as the Habs Regs require compensatory habitat to be in place or MR carried out before impacts occur, which may well require action starting before the next SMP review.	Julian Payne	26-Aug-10	Further detailing of the Action Plan will take place as the Action Plan (intended as a living document) is implemented and developed through continuation (in some way) of the CSG and EMF beyond the SMP.	No changes made	QRG Review continues on next line in column G		
3.3		13-Sep-10						Reliance on a possible living Action Plan to provide, if needed, compensation for Habs Regs seems risky, especially if the need to initiate compensatory works was required prior to SMP3. However, the Natural England letter of agreement indicates that they accept that this issue can be resolved by SMP3.	Can the team please comment, by response on this review sheet, on the possibility of needing to move to MR or initiate compensatory works prior to SMP3 (the timing of which is anyway uncertain), and that there are actions in the Action Plan that would prompt these activities if necessary?	Julian Payne	04-Oct-10	Action 1.7 adequately provides consideration for the possibility of needing to move to MR or initiate compensatory works prior to SMP3.	No changes made	Content that the MR options will be in hand in time. Satisfied.	Julian Payne	06-Oct-10
4.1		21-Dec-09				Appendix F contains a lot of information on coastal processes, but I do not recall seeing much comment on the risk of major episodic events, locations suffering constant or intermittent problems and so forth.	Could the Lead Authority (LA) advise where in the SMP this is discussed? If not, can text be added?	Steve Jenkinson	11-Feb-10	Not mentioned in the guidance, but could see the relevance of this to make clear to the reader that flood defence is not absolute. Don't think this needs stand-alone analysis in appendices, but could add some words in section 2.1.6 on historic events (1953, more regular events at Heacham).		QRG Review continues on next line in column G				

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4.2		26-May-10	Technical	Coastal Processes	Main Document; Appendix F	I agree with the adding text in the main document, certainly no analysis required. Current text is broadly what I was suggesting but I am not sure that the focus on 1953 loss of life is helpful. I had envisaged a brief comment on how different areas are subject to different risks (only major events, constant problems), citing some examples. It could include for example areas that are at risk but which to date have not justified protection works. But not a thorough analysis, only a flavour.	Re-work text.	Steve Jenkinson	26-Aug-10	The team have taken the decision not to reword the document in this instance as it would not provide further clarification regarding this point. There is a different nature of risk between the PDZs. PDZ1 is characterised by large defences and hence a low probability of flooding but a high impact. PDZ has a low and natural defence and hence a medium probability of flooding and a medium economic impact. This is because land is adapted by not having permanent properties, but there is a high risk to life. PDZ3 is likely to experience regular overtopping of the promenade but land use is adapted to this.	No changes made	Accept that the Project Team has considered this and is content with the wording. Satisfied.	Steve Jenkinson	13-Sep-10
5.1		21-Dec-09	Technical	Coastal Processes	Main Document Sect 4	The plan for the cliffs at Hunstanton is to allow erosion to continue in the short and medium term.	Can the LA advise whether the cliffs are at risk only of toe erosion, or whether they are also at risk of landslide due to instability (groundwater issues etc)? If the latter, can the LA advise whether any hold the line (HTL) consideration in epoch 3 should be for external funding consideration?	Steve Jenkinson	11-Feb-10	The major failure mechanism is deemed to be stress induced failure as a result of deep undercutting. The presence of relatively weak rock materials at the toe of the cliff makes them prone to wave attack. Material then erodes by undercutting, which propagates up the cliff face by a series of small slab or block failures. In addition 'minor failures' can be caused by kinematic feasibility of movement along existing discontinuities. The most prevalent of these is thought to be planar sliding failures within the Grey Chalk along the inclined joint. In conclusion: we would suggest it is dominated by toe erosion.		QRG Review continues on next line in column G		
5.2		26-May-10	Technical	Coastal Processes		Thank you for the response, that's fine. I suggest that there is a brief comment added (Main Doc?) to confirm this conclusion.	Add comment to docs.	Steve Jenkinson	26-Aug-10	We have added comments to Appendix C and main doc	Detailed comment added to Appendix C, section C7 p.43 (bullet point 8 under 'Key physical features'). Summary comment also added to Main Document, section 2.1.5, para 4 ("The cliffs are undefended and are therefore experiencing erosion. This is dominated by toe erosion, with the major failure mechanism deemed to be stress induced failure as a result of deep undercutting. ")	Satisfied	Steve Jenkinson	13-Sep-10
6		21-Dec-09	Technical	Coastal Processes	General; PDZ2. Also Page 53 in the main report.	There is a drift [sediment] divide in the centre of PDZ2 in the Hunstanton area. Also, the main report identifies this feature as an issue in the medium term but its not clear why this is the case.	What is the reason for the divide in PDZ2 and what is the likelihood of this changing in the future? Can the LA please clarify the reasons for the increasing importance of this drift divide in this location?	Jim Hutchison	11-Feb-10	Within the Wash embayment the waves originate from two sources: those generated locally within the embayment; and those generated in the North Sea. PDZ2 is relatively exposed to the influence of waves originating in the North Sea. This induces a net movement of sediment in a southerly direction. However for PDZ2, the shoreline is not straight, nor is the wave climate constant, and therefore there are subtle changes of longshore transport. In front of Heacham, for example, there are very low net drift rates and drift is in opposing directions. The sand fraction moves in a northerly direction and the shingle fraction moves in a southerly direction.  This is known as a sediment drift divide and leads to erosion in front of Heacham. In the short term this drift divide will continue to lead to erosion at Heacham. In the medium and long term the drift divide could be intensified due to sea level rise. In addition in the long term sea level rise will outpace accretion of the offshore sandbanks, which could result in PDZ2 becoming more exposed, further intensifying the sediment drift divide and leading to increase erosion.		Not clear if any amendments made. Satisfied.	Jim Hutchison	15-Jun-10
7.1		21-Dec-09	Technical	Coastal Processes	Main Document; Appendix H	PDZ1 has both erosional and accretional futures to accommodate the "envelope of foreshore development".	Please could the LA clarify if this approach is applicable to the assessments of the other PDZs?	Steve Jenkinson	11-Feb-10	It is not relevant for PDZs 3 and 4. For PDZ2, the uncertainty is caused by a wider range of issues which means that using these two futures would not help to clarify.		QRG Review continues on next line in column G		
7.2		26-May-10	Technical	Coastal Processes		Okay, noted. Is this clear in the document – if not please add a line to explain.	Add text.	Steve Jenkinson	26-Aug-10	The SMP documents clearly explain why a different and unusual approach ("envelope of foreshore development") has been applied to PDZ1. There is, however, no explanation of why we have not used this approach for the other PDZs, however it is felt that this would not add anything to the reader's understanding.	No changes made	Accept that the Project Team has considered this and is content with the current wording. Satisfied.	Steve Jenkinson	13-Sep-10
8		21-Dec-09	Technical	Coastal Processes	Main Document Page 23, Section 2.1.5	Gibraltar Point is reportedly fed by sediment from updrift, but also, from the nearshore banks.	Please include this in the text.	Emma Fisher	11-Feb-10	Agree, this is missing from the text. Amendments will be made		Satisfied	Emma Fisher	26-May-10
9.1		21-Dec-09			Main	Natural Shingle ridge around Heacham, on pg 18: it is not mentioned that this shingle ridge is managed, the ridge therefore does not have a tendency to roll back. This comment is misleading as to how the shingle ridge currently behaves.	Suggest revision of text to clarify the management of this ridge.	Siobhan Browne	11-Feb-10	Agree it is better to add words here. The managed state of the shingle ridge is of course amply discussed elsewhere.		QRG Review continues on next line in column G		

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9.2		26-May-10	Technical	Coastal Processes	Document p 18	On page 20, it does state that the Heacham shingle ridge is managed. However, I cannot find 'ample discussion' of the managed state of the ridge elsewhere in the main document, based on a search for the word 'Heacham'.	Addition of text to briefly explain how the Heacham shingle ridge is managed, either on page 20 or elsewhere (but if latter, add cross reference at page 20).	Simon Bates pp Siobhan Browne	26-Aug-10	Management of the shingle ridge is amply discussed in the main SMP documents in section 2.1.6 (Coastal Defences) and section 2.3.3 (PDZ2 With Present Management). Addition of references relating to the shingle ridge would require the addition of text for all defence types and would not add anything further to the document.	No changes made	Satisfied	Simon Bates pp Siobhan Browne	13-Sep-10
10		21-Dec-09	Technical	Coastal Processes	Main Document Page 16, Section 2.1.2 and Page 22, Section 2.1.5, end first paragraph	We would not recommend proposing sea level rise as a cause of accretion in the Wash today or in the future; historically glacial material was transported onshore due to post-glacial sea level rise. Sediment transport into the Wash today tends to take place through reworking of previously deposited seabed sediments by tidal transport, and reportedly, through longshore transport from the north.	Please review the text and separate out historical coastal processes from present day coastal processes. Suggest to avoid discussion of sediment transport into the Wash, the rate of mudflat/saltmarsh accretion, and sea level rise (SLR) together as one process.	Emma Fisher	11-Feb-10	Agree, text to be amended.		Satisfied	Emma Fisher	26-May-10
11.1		21-Dec-09	Technical	Data and Mapping	Appendix C - Figure 2.7 and Page 41 main Report	The reference to 1997 I assume was SMP1, but it is not clear if the trends since then have been assessed. There are also references to the Lincolnshire Coastal Study [Page 41 Main Report] but the reader is left without an understanding of the importance of this work, i.e. is it Statutory and hence leading the SMP, etc? [JH]	Can the LA please explain what has been done since SMP1 on this trend, and what the conclusion is? Which is line 1 and which line 2? Which processes are statutory and which are not? [JH]	Jim Hutchison Steve Jenkinson	11-Feb-10	Re. Posford 1997a, this is not SMP1 but the Wash Extended Shoreline Evolution Analysis undertaken for the Environment Agency (Anglian Region). Line 1 is the most seaward line and Line 2 is the most landward line (this is marked on the figure, but the text is quite small). More recent observed trends are provided in C4.8 and this includes analysis of the EA's Shoreline Management Group monitoring. Re. Lincs Coastal Study: 2.2.2 explains its status, but we could add text to 1.1 to explain in more detail.		QRG Review continues on next line in column G		
11.2		26-May-10				Response and text changes noted. Could you also add a line to explain who commissioned and approved the study please? (SJ)	Add text or reference if already explained. (SJ)	Jim Hutchison Steve Jenkinson	26-Aug-10	Re. SJ comment - The Lincolnshire Coastal Study was commissioned by Lincolnshire County Council, in partnership with other SMP partner organisations (including the Environment Agency). It was carried out to inform the Regional Spatial Strategy.	No changes made	Satisfied	Jim Hutchison Steve Jenkinson	13-Sep-10
						Satisfied. (JH)	Please confirm plans for any amendments in line with response. (JH)			Re. JH comment - no document changes have been made.				
12.1		21-Dec-09	Technical	Data and Mapping	Table 2.1 PDZ3. Also pp 51& 59 in the main report.	Given that such a large part of this area is prone to flooding, it is not clear where a no active intervention (NAI) consideration is set out for both now and with the assessed climate change scenarios considered. Table 2.1 in the main report appears to start this discussion and P51 leaves the reading asking what climate change in epoch 3 might mean for the flood zones. Also, in the main report there are statements about the continuation of defences, but there does not seem to be a clear case to do so. [JH]	Can the LA please explain how the floodable areas might change with climate change, i.e. what additional areas might be subject to flooding and under what scenarios? Also, where the maps are to help explain this? References would assist.	Jim Hutchison Andy Parsons	11-Feb-10	Not clear if this comment refers to PDZ1 or PDZ3. Re. NAI floodmaps: see response to issue 27. Re. reasoning for HTL in PDZ3: see issue 53. Re. policy mapping: it was felt in EMF / CSG that the issues per PDZ are too different to allow one consistent set of maps. The maps for PDZ2, 3 and 4 have been made as consistent as possible.		QRG Review continues on next line in column G		
						Inconsistent mapping of policy & broad scale coastal flood risks are not clear. [AP]	Can the LA please explain the reasoning behind the justification for continued defences in this unit. [A clear argument on the policy appraisal would assist in this context.] [JH]			AP's comment - The conditional nature of the policies for PDZ1 & PDZ2 mean that standard policy maps are not possible. Regarding the floodmap, Fig F4.1 on page F165 (showing the 6.5m +OD contour line) illustrates the likely extent of the NAI floodzone and Fig F4.2 on page F166 shows the Environment Agency floodmap. To include the flood zone map on each policy statement would be confusing as: for PDZs 1 & 2, in the absence of standard policy maps (explained above), you would literally just be showing the floodzone which is not the purpose of this section, and for PDZs 3 & 4, the floodzone map would add no value, instead making the base mapping less clear.	Re, AP comment - no changes made			
12.2		26-May-10	Technical	Data and Mapping	Table 2.1 PDZ3. Also pp 51& 59 in the main report.	Not satisfied. I have looked through the main doc, but can only find policy mapping for PDZ3 - cross-sections shown for PDZ 1 & 2 but no maps. There needs to be policy mapping for the whole SMP and coastal flood risks need to be shown on the policy mapping. (AP)	The provision of policy maps with coastal flood risk zone shown will significantly help understanding. (AP)	Andy Parsons Jim Hutchison	26-Aug-10	Re. JH comment - The NAI floodzone hardly changes due to sea level rise as it is bordered by relatively steep high ground all round. As far as BCR and damages are concerned, the impacts of climate change would be higher probabilities of more significant flooding as time goes on, but not a larger flood extent. Therefore this assessment did not need to be carried out as the outcome was obvious, and the extra time and work required to do so would not provide any real gain.	Re. JH comment 1 - no changes made	Not entirely happy, as needing to refer to the depths of Appendix F hardly makes the document easily accessible or understood. However, provided that the CSG is content that the policy statements make the flood risks clear then satisfied [AP]	Andy Parsons Jim Hutchison	13-Sep-10
						I'm seeking an estimate of the impacts of climate change over the plan duration, i.e. is the flood plain likely to be as is now, or more extensive? Not satisfied on Part 1 of my question. No response to justification part of question. Not satisfied with response to second part of this question. (JH)	Please respond fully, and advise any planned amendments to the documents. (JH)			Re. JH comment 2 - no changes made		Satisfied (JH)		
13.1		21-Dec-09	Technical	Data and Mapping	Main Document;	With respect to some key data sources, National Flood and Coastal Defence Database (NFCDD) data has clearly been referenced. Sea level rise data has been taken from Defra (2006) guidance. There does not appear to be any reference to Futurecoast.	Could the LA advise how UKCP09 outputs will be considered? Also whether Futurecoast was used in the development of the SMP and if so where this is referenced?	Steve Jenkinson	11-Feb-10	Agree to make explicit mention of UKCIP in main text with reference to sensitivity testing. Futurecoast: was used in the SMP as baseline information, but did not have a large input into the development of Baseline Scenarios. This will be re-checked and will be highlighted in relevant sections of the text where appropriate.		QRG Review continues on next line in column G		

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13.2		26-May-10			Appendix F	Re UKCP09, I have found text in Sect 2.1.7 which looks okay. With regard to Futurecoast, I am not clear on your comment – was the data not really applicable for some reason? I am unable to check any changes as no references.	Can the team please respond re Futurecoast and advise where changes have been made?	Steve Jenkinson	26-Aug-10	Futurecoast is referenced in the main document, section 1.1 (page 2) as one of the key pieces of new information since SMP1.	No changes made	Not a full response to my query re the extent of use of Futurecoast, but I accept that it was used and is referenced in the documents. Satisfied.	Steve Jenkinson	13-Sep-10
14.1		21-Dec-09	Technical	Data Issues	Summary document	The document explains the need to understand the information that exists for all 4 PDZs.	Can the LA please explain what studies have been done since SMP1 and which zones these studies apply to?	Jim Hutchison	11-Feb-10	Is the intent of this comment to explain to the public what work has been done? Can see the benefit of that and could add some text to main doc and non-tech summary.		QRG Review continues on next line in column G		
14.2		15-Jun-10				Some text with an appropriate listing of studies/assessments would be sufficient. Can the team add a cross reference to the adjacent amendment box so that this issue can be closed. Not Satisfied [JH]	Can the team please make changes as suggested? (JH)	Jim Hutchison	26-Aug-10	The main document, section 1.1 (top of page 2) lists work undertaken since SMP1.	No changes made	Satisfied	Jim Hutchison	13-Sep-10
15.1		21-Dec-09	Technical	Decision Making	Appendix F - Section F6	The policy appraisal is quite complex.	Can the LA provide a simple summary or direct the reader to where this is summarised and simplified elsewhere in the report?	Jim Hutchison	11-Feb-10	The approach is summarised in section E1; we could choose to add some more text from that to section 2.4 (which now only refers to App E). The resulting policies and their implications are summarised in Section 3 and 4 of the main document, and in Appendix G including appraisal results. This was consciously written to 'describe the policies and their implications', not as a description of options and their appraisal; we believe this is right and in line with the guidance. But we could consider adding a concise description of the content of the appraisal within Appendix F. This does beg the question: should we tell the story of the appraisal as it happened, or should we describe it in an idealised way? Appendix F currently tells the whole (quite complex) story.		QRG Review continues on next line in column G		
15.2		15-Jun-10				Can the team please clearly set out the statement given in this response. It is important that the reader of this plan [which will be held on a public website] can follow the methodology adopted and the guidance states that this needs to be clear and transparent. Perhaps a flow chart could simplify? Not satisfied.	Please clarify methodology used.	Jim Hutchison	26-Aug-10	Further clarification has been provided as a flowchart in the section 2.4.2 of the main document.	New figure has been inserted into section 2.4.2 of the main document (figure 2.25 on page 68)	Satisfied	Jim Hutchison	13-Sep-10
16.1		21-Dec-09	Technical	Decision Making	Main Document, p33 & Sections 3 & 4	It says on p33 that "Each PDZ may have to be subdivided into a number of MUs. This will be discussed in more detail in section 3." However, this is not done and as a result this SMP is inconsistent with other SMP2s that present the results at a Policy Unit (PU) level, as described in the guidance. [AP]	Please review the need to split PDZ1 into smaller Policy Units (PU's). [AP]	Andy Parsons Steve Jenkinson	11-Feb-10	Suggest to reword page 33 to clarify. Section 3 indeed does not explicitly discuss Management Units, but it does explain for PDZs1 and 2 that in firming up the policies, different parts of the PDZs may end up with different policies. On the more fundamental point of having to split up PDZ1 (or PDZ2 for that matter) in order to get smaller PUs: don't agree - the PDZs that we have are uniform for the level of decision making possible within this SMP (even where the existing defence consists of more than one defence type - the big issue is at the scale of the PDZ2). Could rename the units to be called Policy Units, but that begs the question whether national consistency of terms is sufficiently important for that. Possibly worth adding words in the main doc that the policy development zones happen to have ended up as Policy Units in this case.		QRG Review continues on next line in column G		
16.2		26-May-10				It appears that the whole PDZs are being considered as single units. Previously (p 33) it is noted that the subdivision of PDZs into Management Units (MU) or policy would be discussed in Section 3. [SJ]	Could the LA advise where in Sect. 3 this discussion takes place, and confirm that there are no sub sections that would benefit from being dealt with separately? For example, p72 notes that for PDZ2 possible realignments are likely to occur frontage by frontage. Also PDZ2 includes concrete flood defences and shingle ridges. [SJ]				Looking at Figure 2.7, PDZ1 is by far the largest. I agree that the big issue is at PDZ scale, but there may be sections of defence in PDZ1 that could be realigned in future. However, provided that the Action Plan deals with the potential for alternative approaches for sub-sections I consider should be OK. (AP)	Please confirm that the Action Plan will deal with the potential for alternative approaches for sub-sections. (AP)	Andy Parsons Steve Jenkinson	26-Aug-10
			You have confirmed that at the SMP level there is no benefit in splitting the PDZs into smaller units. I think therefore that it is important for the document to be unambiguous with regard to the approach and terminology, and the changes that you have made appear to have largely addressed this. The new text at 3.1 is in my view fine. At 2.21 it looks as if a slightly different point is being made, that it was not originally intended that the PDZs would be equivalent to Policy Units, and that this would be subject to further consideration. If so then I think the text should be re-worked slightly as it does not read well.	Please consider additional text and minor editing. (SJ)	With regard to renaming the units Policy Units I see little benefit given the work involved. But it may be worth reiterating the explanation in 3.1 earlier in the document to make it clear. (SJ)		Re. SJ comment - the text has been reworded in section 2.2.1 of the main document (p.32) to reflect the existing text in section 3.1 (p.69).	Re. SJ comment - text reworded in section 2.2.1 of the main document (p.32)						

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17	Showstopper	21-Dec-09	Technical	Decision Making	Page 41 possible future land use changes and environment, page 71 - 4.2 Recommendations and Justification	The second key future external pressure - potential need for increased area of good quality agricultural land as a result of food security - ignores current UK understanding and policy. UK government's Food Security policy identified that Energy dependency is the headline indicator, and that 'risks to UK food security are more likely to come from sudden disruptions to food chains than lack of food'. The Cabinet Office Food Matters strategy concludes on food self-sufficiency 'Attempting to pursue national food security in isolation from the global context is unlikely to be practicable, sustainable or financially rational'. Concentrating agricultural production in this low-lying coastal area would increase risks of disruption from extreme flood events, and increase energy reliance due to likely pumped drainage needs. Whereas, the justification in section 4.2 confirms that realignment of defences 'would provide a more sustainable flood defence for both the people and the high quality land further inland.'	Future SMP policies should be assessed on best current understanding and current Government Policy. Hypothetical scenarios with no policy or evidence base support should be removed from the plan.  With reference to the appropriate assessment (AA) and the need to ensure that habitat is secured prior to any losses, the policy for PDZ1 should be set for managed realignment (MR) in the medium to long term, but with a note that monitoring of the response of the habitats should inform whether this remains the policy in future SMP revisions and what extent of realignment would be required. This would be a no regrets policy and would satisfy the Habitats Regulations (HR).	Julian Payne	11-Feb-10	See issue 3. Issue of food security has been key to policy development in discussion with all partners, and it has been agreed that the importance of the issue plus the uncertainty surrounding future food security warrant the chosen approach.		Response noted. Please refer to Item 3.	Julian Payne	26-May-10
18.1		21-Dec-09	Technical	Decision Making	General	There is clearly a lot of uncertainty around preferred policy options for the latter epochs. However, there appears to be little attempt to consider the consequences of the preferred policy options. More work on this is required to clarify what the preferred policy option should be.	Can the LA please comment on this and set out preferred policy options for epochs 2 and 3 as appropriate.	Jim Hutchison	11-Feb-10	See response to key issue nr 1		QRG Review continues on next line in column G		
18.2		15-Jun-10				Unclear why issue one about defence locations is stated here? Can the team indicate where the uncertainty in data is discussed [with a cross reference in the adjacent box] and the impacts of this uncertainty on the decisions made in this plan? Not satisfied.	Clarity and transparency required.	Jim Hutchison	26-Aug-10	Apologies; the reference was not to issue 1 from this table but to issue 1 from the 'key issues table' that was used in the initial discussions between QRG and the project team.  Section 2.4.1 sets out the big issues for the SMP in each PDZ. Issue 4 for PDZ is the uncertainty. The policy statement in 4.2 then explains that given the large uncertainty for epoch 2 and 3 and the impacts of either HTL or MR, choosing one of these at this stage would not be a robust way of dealing with uncertainty.	No changes made	Satisfied	Jim Hutchison	13-Sep-10
19.1		21-Dec-09	Technical	Decision Making	Main Doc Sect 4.3 PDZ2	There is no preferred policy option for the second and third epochs, yet the text on p75 suggests that it will be difficult to maintain the existing two percent Annual Exceedance Probability (AEP) standard.	Given this, could the LA explain why the HTL policy option is seen as a feasible option for the second and third epochs? (Also for information you may be aware that Southern Region have recently prepared a strategy for Pagham to East Head. This includes the Medmerry frontage which appears to have similar issues and may help your considerations here)	Steve Jenkinson	11-Feb-10	HTL could be a feasible option for part of PDZ2, and / or if third party funding is secured. Holding the current arrangement with a lower AEP would still be called HTL, and this is certainly realistic for the southern extent that protects the saline lagoons. Interested in info on the Medmerry frontage (and we would be able to get this directly via our contacts in Southern).		QRG Review continues on next line in column G		
19.2		26-May-10				Response noted – seems reasonable. Not sure if any comments along these lines have been added to the document?	Could the team please advise if these comments have been added?	Steve Jenkinson	26-Aug-10	The policy statement for PDZ2 clearly describes that Hold the Line is an option and that 3rd party funding is likely to be required. The text for PDZ2 does not explicitly say that a lower SoP could be an option, although the policy statement does state that an appropriate SoP is one of the criteria for a sustainable solution.	No changes made	Satisfied	Steve Jenkinson	13-Sep-10
20.1		21-Dec-09	Technical	Linkages	Appendix E - Page E41 and Para E4.1 Main Report Sect 4.2	There is a mixture of SMP and Catchment Flood Management Plans (CFMP) approaches used in some of the PDZs. Also, it is not clear how this has been used in the appraisal of the policy options. [JH]  The policies for PDZ1 include reference to policy codes which look as if they are drawn from CFMPs. I think this will lead to confusion as presented. [SJ]	Can the LA please explain why this dual approach to appraisal is needed and which units it applies to. There is some confusion as to what we are trying to do here. Also the policy appraisal section seems short and does not appear to clearly set out all the arguments - is there another part of the plan where this is done? [JH]  The LA should consider the need to introduce the "P" codes, and as a minimum provide further explanation at this part of the report. [SJ]	Jim Hutchison Steve Jenkinson	11-Feb-10	Our initial response would be to refer to section 2.4.1, which sets out the 'big decisions' for this SMP. Issue 2 for PDZ1 explains the approach, developed together with the partners. The use of the P-codes was chosen to ensure consistency with CFMPs. Suggest to clarify wording in Appendix E. Note that the chosen P4 policy is consistent with the CFMP policies for the relevant river sections, and that these CFMPs+ have identified the need for an integrated coastal / fluvial Fens defence strategy (also to be included in the Wash SMP Action Plan).		QRG Review continues on next line in column G		
20.2	Showstopper	26-May-10				I understand that the CSG has chosen to present a more "meaningful" policy eg. not just HTL but HTL with an indication of the degree of risk that will be acceptable (the P4 policy). The flip side is the enhanced delivery risk resulting from this, but I recognise this is a matter of judgement.  Given that this is the approach adopted, I still believe that the presentation could be improved to reduce the chance of confusion. I think it is the list (P1 to P5) in PDZ1 that gives me concern – will readers understand why it is there and why the link to CFMPs for this PDZ and not the others? (SJ)  Happy to accept the combinations of policies in this SMP given the large floodable areas on this part of the coast. However, there are statements in the plan - see E3.3.3 in main report - about P2 not being acceptable but P5 is acceptable. Surely this should be based upon a full consideration of technical, environmental and economics	The team should consider how this will come across to "uninformed" readers. (SJ)  Can the team consider this further, including the need for amendments to the document? (JH)	Steve Jenkinson Jim Hutchison	26-Aug-10	Amendments have been made to the main document and Appendix E to make it more explicit that these are CFMP-like policies.  Amendments made as follows: -Main doc: P.vi and P.xv - CFMP added to Glossary and Abbreviations List P.8 - Status of CFMPs added, and policy definitions worded as they appear in CFMPs P.64 - bullet 2 - inserted "To this end, CFMP-defined flood risk policies have been referenced to provide an indication of future intent. (See Appendix E, section 3 for a full description of their usage in the SMP process)." P.81 - Definitions of CFMP policies amended -Appendix E: P.E42 Section E3.2.1 - text amended P.E46 Section E3.2.2 - text amended P.E48 Section E3.3.3 - text amended P.E56 Section E3.3.3 - text amended	Satisfied	Steve Jenkinson Jim Hutchison	13-Sep-10	

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						in the area? Not satisfied (JH)					P.E57 Section E3.3.3 - text amended P.E58 Section E3.4.2 - text amended P.E84 Section E4.1.4 - text amended			
21.1		21-Dec-09	Technical	Linkages	Main Document p5 Sect 1.2	The plan notes that the study area includes everything (spatially) that can influence shoreline management, which is clearly good. I am also pleased to see confirmation of the tie-in with CFMP boundaries. However, I do not recall any discussion on the compatibility of policy options at the boundaries.	Could the LA please consider also adding a comment on the consistency (or otherwise) with the adjacent CFMP policies? (A section from the CFMP may be helpful to repeat here.) Also a comment on the status of adjacent SMP2s and whether there are likely to be any compatibility issues.	Steve Jenkinson	11-Feb-10	This has been taken into account but not reported explicitly. Suggest to add text in section 1.2.		QRG Review continues on next line in column G		
21.2		26-May-10				I see some text has been added at 1.2 (p8). I think there may be an opportunity to briefly explain the CFMP policy options here instead of at PDZ1, not least because as currently drafted readers may not understand what "Policy Option 4" etc means in the context of the SMP. Further, does the report explain whether the CFMPs are approved, and whether the SMP policy options are compatible with the CFMPs (as opposed to having taken them into account)?	The team should consider some re-wording to ensure this is clear.	Steve Jenkinson	28-Aug-10	Text has been added to further clarify.  Section 4.2 of the main document (last paragraph on p.80) explains that the SMP policy option for PDZ1 is compatible with the CFMP policy options.	The status of the CFMPs and the CFMP policy options have been explained in section 1.2 of the main document (p.8).	Satisfied	Steve Jenkinson	13-Sep-10
22		21-Dec-09	Technical	Risks and Impacts	Page 41 possible future land use changes and environment	Available agricultural land is cited as a potential future driver that conflicts with known habitat/coastal squeeze drivers. However, page 24 confirms that extensive land claim has been the most important factor in the Wash's development. Reclaiming of agricultural land is reviewed in Appendix E, page E61 - local rebalancing policy package to be 'certainly feasible'. As such, even after any shoreline realignment this would not rule out a future Advance the Line (ATL) if world conditions did require a rethink about the need for national food self sufficiency. [JP]  Sect 2.2 notes the potential need for an increased area of good quality agricultural land. [SJ]	Confirm the viability of long term ATL for re-establishing future agricultural land if MR was adopted in the medium term. This would assure communities and politicians that MR could be a no regrets policy. If this proves to be the case, amend text such as sect. 4.2 Recommendation and justification where it states 'these would be difficult to reverse'. [JP]  Given this potential need, could the LA advise whether an ATL option was considered, and if so where this is discussed?	Julian Payne Steve Jenkinson	11-Feb-10	Section 2.1.7 (Page 30) of the main report explains that Atl has not been looked at explicitly in this SMP, but is left open as an option if the situation changes. It is clear that reclamation after realignment is not impossible (see centuries of reclamation), but obviously it is difficult and costly. Reason enough (in the CSG / EMF's opinion) to only choose MR if there is more certainty that it is the right option. No rewording suggested.		Response noted. Please refer to Item 3 (JP)  Satisfied (SJ)	Julian Payne Steve Jenkinson	26-May-10
23.1		21-Dec-09	Technical	Risks and Impacts	General	I do not recall seeing any discussion on flood warning and contingency planning issues. This is particularly important in large flood zones.	Could the LA please advise where in the SMP these issues are discussed, including how they relate to the recommended policy options? Will any relevant actions be included in the Action Plan (AP)?	Steve Jenkinson	11-Feb-10	Risk to life is a key issue for PDZ2; could add words to refer to existing evacuation notice, although not sure if that adds to the story. Flood warning and emergency planning will certainly feature in the action plan (for PDZ2 but also PDZ1 and PDZ3).		QRG Review continues on next line in column G		
23.2		26-May-10				Good that they will feature in the Action Plan.	Could the team consider a couple of lines on this in the main text?	Steve Jenkinson	28-Aug-10	Text has been added to section 2.1.6 (Coastal Defences) on the PDZ2 evacuation procedures in particular. As indicated, flood warning and emergency planning feature in the Action Plan (actions 0.4 and 0.5).	No changes made	Satisfied	Steve Jenkinson	13-Sep-10
24		21-Dec-09	Technical	Risks and Impacts	Appendix C - Page C7	There was a breach of defences in 2002 at Freiston Prison Camp.	Can the LA please explain if this was for economic or environmental reasons? What was the key driver and can it be replicated in others parts of the coast on this SMP if required? If for environmental reasons, how is the Regional Habitats Creation Plan (RHCP) linked with this SMP?	Jim Hutchison	11-Feb-10	Combination of reasons (including sustainability of the defence). It would be an example if we do get to MR schemes, but currently the only frontage mentioned by some as a similar candidate for MR is Jubilee Bank (but this is not accepted by all partners). Re. RHCP: Is currently looking at providing some replacement around the Wash as discussed with Paul Miller and can include linkages within the document.		Satisfied	Jim Hutchison	15-Jun-10
25.1	Showstopper	21-Dec-09	Technical	Risks and Impacts	Main Doc Sect 4.2 PDZ1 p72; Appendix F Table F.2.7	There is a statement to allow private owners to "sustain" existing defences. [JH]  The plan notes that the intent is to allow current private undertakers to sustain the existing defences. [SJ]	Can the LA please explain if or where there may be coastal process reasons where continuing to maintain defences may have significant impacts? And does the LA mean for owners to "maintain" defences, or if "sustain" (which implies improvements) is the intention in this zone? [JH]  I assume the number and length of private defences is as set out in App. F. Could the LA clarify whether all private owners are indicating a willingness to sustain the current defence standards? [SJ]	Jim Hutchison Steve Jenkinson	11-Feb-10	As for the whole of PDZ1, we expect there may be coastal processes impacts of HTL in Epoch 2 and 3, which would then lead to an MR policy. 'Sustain' should be replaced by 'holding the line' in this instance (but note that the intent is for the combination of the two lines to 'sustain' (P4) in this case). Table F2.7 is indeed correct: this concerns Jubilee Bank in the north west corner of The Wash.		QRG Review continues on next line in column G		
25.2		26-May-10				Satisfied. (JH)  Not sure the document comments on the position of private defence owners with regard to the sustain option, but perhaps this is subject to future discussion? [SJ]	A cross reference to the Page number would be helpful. (JH)  Could the team comment please? [SJ]	Jim Hutchison Steve Jenkinson	28-Aug-10	Re. JH comment - text on the private owners is on p.80 (section 4.2) of the main document.  Re. SJ comment - a discussion on the position of private defence owners with regard to the sustain option is provided in the PDZ1 policy statement (section 4.2) on p.80 of the main document.	No changes made	Satisfied	Jim Hutchison Steve Jenkinson	13-Sep-10

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26		21-Dec-09	Technical	Risks and Impacts	Appendix F - Pages F5/6 and Main Report Para 2.1.6	<p>The assumptions that are being made on the integrity of secondary and tertiary defence lines is not clear. [JH]</p> <p>Appendix F notes that following discussions with the Environment Agency (EA) it was decided that only managed defences (which in most cases are the frontline defences) should be considered throughout this assessment. [SJ]</p>	<p>Can the LA please clarify and explain if the secondary and tertiary defences have any continuing defence function or if they are effectively failed defences and with gaps, etc? Is there any form of maintenance investment now made on any of them, and if so where can these be viewed on the maps accompanying this SMP? [JH]</p> <p>Can the LA explain whether excluding secondary and tertiary defences limited the appraisal of policy options eg. MR? [SJ]</p>	Jim Hutchison Steve Jenkinson	11-Feb-10	see issue 1. They have no current formal defence function, and they have been considered in appraisal, as obvious candidates (although not certain) for upgrading if realignment is chosen.		Satisfied	Jim Hutchison Steve Jenkinson	26-May-10
27.1		21-Dec-09				<p>The amount of uncertainty that is set out in this report will make planning decisions on future development and use of land very difficult to take. Would it not be better to set out a best endeavours policy option in the 2nd and 3rd epochs with an envelope of uncertainty accompanying these? [PB]</p> <p>In PDZ 1 and 2 in particular there are repeated statements about uncertainty, but one of the outputs from all SMPs is to offer expert advice on such matters. The uncertainty set out appears to outweigh any positive statements in this plan, leading to a number of possible policy options in a number of different epochs throughout the 4 PDZs. Leaving a choice of 3 of the 4 policy options is unhelpful for a number of reasons, for future erosion mapping and in allowing planners to make informed decisions, to name but two. [JH]</p>	<p>Can the LA please comment on this and explain how this plan will be able to guide future planning decisions? [PB]</p> <p>Can the LA please use their expert judgement to offer some indication as to which policy option is most likely to be realised in all the PDZs and set out where this is ultimately discussed in the reports? For cliff erosion areas this data will be required for a number of other initiatives as noted e.g. erosion mapping and so on. Also, in areas of flooding, it is still unclear if HTL can be sustainable, but perhaps better NAI flood maps indicating the climate change scenarios might help on this?</p> <p>The only unit with any clear conclusion is PDZ3 and this appear to be the one where the economic justification appears weakest - again can the LA please clarify and comment on this? [JH]</p>	Peter Bide Jim Hutchison	11-Feb-10	<p>The draft Plan was developed in full partnership with both CSG and EMF, which includes the Heads of Service for all planning authorities, planning officers and members, and they are fully signed up to this approach. This also includes full involvement from the Lincolnshire Coastal Study, which is developed in parallel to produce recommendations for land use planning in flood risk areas for the RSS. Could consider asking local authority reps to discuss issue with Peter Bide. See also response to 'Summary of key points' - item 1. NAI flood maps were produced and discussed with CSG and EMF and have played a vital role in policy development (see Section 2.3.2), but it was decided to only include the map in Figure F4.1 ((6.5m+OD contour line) to illustrate the issue that the NAI floodzone reaches all the way to Lincoln, Peterborough and Cambridge. No changes suggested for now.</p>	QRG Review continues on next line in column G			
	Showstopper		Technical	Sustainability	Section 3 Main Report					<p>PB's Comment: Within PDZ2 there are a number of multi-million pound investments built around the tourist industry. All these investments rely on the sea defences for their future. The policy options considered for this frontage in the medium to long-term were: Managed Realignment (MR), Hold the Line (HTL) and No Active Intervention (NAI). The SMP acknowledges that the science surrounding climate change and the possible effects it may have on this coastline in the future is currently unreliable. Had it been clear cut the SMP would have recommended a clear policy option.</p> <p>However, given this uncertainty, let us assume the SMP had decided, on a balance of probability, to set a firm policy as suggested. Had a policy of Hold the Line been proposed there would have been an assumption by all those interested in the area that everything is ok and they could carry on their businesses, extend their operations, encourage investment and no need to worry. The reality of course is that this option, as far as we know, is not economically viable if national funding is to be used. We could therefore be accused of misleading the public and causing them extreme financial difficulty.</p> <p>Had the SMP set a Managed Realignment or NAI policy then those with interests and investments in the area would have seriously challenged us about the basis on which we were founding these policy decisions. With their livelihoods and future at stake they would not have accepted us imposing these options upon them and we would have difficulty producing the evidence on climate change, the longshore and environmental impacts of HTL and its unviability to back up our decision. In recognition of these difficulties the CSG and EMF took the decision to present this dilemma directly to the local businesses and communities, before the SMP went out to full public consultation, and ask them for their help with addressing it.</p>				
27.2		26-May-10				<p>There needs to be some clarification of the approach [pas are taking to defining CCMA's, given the degree of uncertainty over epochs 2 and 3. I guess this is work in progress, on the back of the Lincolnshire Coast Study, but it would help to get some clarification. I should like to discuss it with them at some point in the future when the opportunity arises. (PB)</p>	<p>Please provide clarification. (PB)</p> <p>Perhaps the team could split out the 3 different questions in this response please? Also clarify whether any amendments have been made? / HJ</p>	Peter Bide Jim Hutchison	26-Aug-10		All comments - No changes made	Satisfied	Matthew Bigault pp Peter Bide Jim Hutchison	13-Sep-10

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						Unclear how the team has responded to my 2 questions? Not satisfied. (JH)	whether any amendments have been made: (or)			<p>The presentation was well received and we now, through the Key Stakeholders Sub-Group, have the opportunity to involve all the local interests in the decision making process including possible funding contributions. Whatever the outcome, MRA, HTL or NAI, the local community will know why the decision has been reached and will have taken part in arriving at that decision. With regard to the Local Planning Authority, we consulted with them at a similar time. They understood the situation and have worked with our own Development and Flood Risk team to develop a Planning Protocol for the area. This sets out controls over development in the area (where they can be legally enforced) and ensures that anyone seeking to undertake development in the area understands the uncertainties for the future of the area.</p> <p>JH's comment 1: Section 2.4.1 sets out the big issues for the SMP in each PDZ. Issue 4 for PDZ is the uncertainty. The policy statement in 4.2 then explains that given the large uncertainty for epoch 2 and 3 and the impacts of either HTL or MR, choosing one of these at this stage would not be a robust way of dealing with uncertainty. Re. NAI flood maps: there were produced and discussed with CSG and EMF and have played a vital role in policy development (see Section 2.3.2), but it was decided to only include the map in Figure F4.1 ((6.5m+OD contour line) to illustrate the issue that the NAI floodzone reaches all the way to Lincoln, Peterborough and Cambridge.</p> <p>JH's comment 2: the text added to section 3.3 of the SMP is included in the response to issue 53.2.</p>				
28.1		21-Dec-09	Technical	Sustainability	Page 20, recent development	This section confirms that land behind defence embankments is often significantly lower than the intertidal areas. With sea level rise, these areas will be increasingly lower than sea levels, with implications for saline intrusion, tidally driven groundwater flooding, increased drainage pumping requirements and costs, and recovery implications for exceedance floods. It is not clear if this has been considered or how significant this might be, either financially or in terms of impacts on practical future land uses. This could have a bearing on HTL options and rationale.	Please review and confirm if sea level rise implications on areas behind defences have been fully considered in terms of practical future land uses over the 3 epochs. As necessary, reassess suitable future land uses in low lying areas behind defences.	Julian Payne	11-Feb-10	This has been part of considerations (e.g. via testing of the baseline scenarios against the objectives), but may need to be made more explicit in the main document. Suggest to add text to 2.2.2 (under Possible future changes) and under 2.3.3, under With Present Management (this is now primarily about the coastal processes under the two scenarios). It won't change appraisal or policy, but needs to be included in firming up the policies in SMP3.		QRG Review continues on next line in column G		
28.2		26-May-10	Technical	Sustainability		Additional text in 2.2.2 does provide more clarity, but further direction to others may be required.	Consider action on Water Level Management Plan or equivalent to address climate change adaptation/resilience of the freshwater drainage system and its infrastructure.	Julian Payne	26-Aug-10	Action 1.6 indicates the need for a Fenland study (currently being initiated) which will deal with these issues.	No changes made	Provided that this study also gives guidance on water level management and its implications, beyond that of just flood management, this could be sufficient. Satisfied.	Julian Payne	13-Sep-10
29.1	Showstopper	21-Dec-09	Technical	Sustainability	PDZ4	Suggesting a HTL in the longer term [main Report P57] would lead to less sediment from the cliffs and possibly a less sustainable frontage. Is this really helpful given the aims set out at the beginning of the plan in relation to having a long term sustainable frontage?	Can the LA please comment on this and say if having a HTL assists the long term sustainability or if other mechanisms, e.g. the future coastal adaptation fund might be more appropriate here?	Jim Hutchison	11-Feb-10	These issues are indeed essential for policy development in PDZ4, but so are the values on top of the cliffs, and the uncertainty surrounding this. In partnership with the local (maritime and planning) authority the decision was made to use this SMP2 to raise the need for this future decision now by having a dual policy, with the aim to firm it up in the next SMP. Through the Action Plan, we are looking to undertake a study of the whole frontage between PDZ2 to PDZ4, to support long term solutions. No changes suggested for now.		QRG Review continues on next line in column G		
29.2		15-Jun-10	Technical	Sustainability		I cant help feel that not looking more closely at this issue now is a lost opportunity. It is not clear when/if any further funding might be available for a further study/assessment in this area and I say, this was the time to do it given the findings of SMP1 and this further work. Satisfied if the team can confirm that such an assessment with funding is likely, if not, they wish to reconsider now? Satisfied subject to confirmation.	Clarity required.	Jim Hutchison	26-Aug-10	Action 1.6 indicates the need for an integrated strategy study, which is currently ongoing. It is important to note that there is no certainty about the impact of Hunstanton cliff erosion on beaches further south; the strategy study will address this issue.	No changes made	Satisfied	Jim Hutchison	13-Sep-10

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30.1		21-Dec-09	Technical	Sustainability	Appendix E - Page E12	The objective "to have as little flood and erosion risk management throughout the plan period as possible" appears an unusual objective, especially as this area is so low lying.	Can the LA please explain the rationale behind this statement, especially in the light of sea level rise, etc? Also what is the plan for those smaller settlements such as those named in this section?	Jim Hutchison	11-Feb-10	The objective needs to be seen against the background of all other principles and related objectives, and the stated need to find the right balance between all of them. It is relevant in considerations of the role of natural processes (e.g. saltmarsh) in flood defence. The plan for smaller settlements depends on future developments (see Policy statement). We expect that the 'belt of established settlements' will continue to be protected up to 2105 (if only because the 'next threshold' beyond them is the high ground). The hamlets and isolated properties seaward may have to be moved through realignment, in case erosion happens to such an extent that this is needed for reasons of defence sustainability / habitats.		QRG Review continues on next line in column G		
30.2		15-Jun-10				Is there a timescale to consider such difficult decisions?	Generally content with response, but locations that may benefit from the Pathfinder adaptation work should be considered sooner than 2105?	Jim Hutchison	26-Aug-10	Adaptation work would have to start long before 2105. However, location specific efforts would be premature given the need to enhance our understanding of whether an erosional scenario is realistic. What could be realistic on the shorter term is to assess the maximum possible need for realignment (assuming total loss) and see how this could be accommodated. Pathfinder funds are also already being used in PDZ2 to assess adaptation requirements.	No changes made	Satisfied I presume this will be added to Action Plan.	Jim Hutchison	13-Sep-10
31.1		21-Dec-09	Technical	Sustainability	Summary Document P13 and Appendix E, Page E12	There appears to be a contradiction between the summary report that states that all settlements are to be protected and Appendix E which states that as many communities [and individuals] as possible are to be protected. Also, there are suggestions that the coastal adaptation fund might be used to assist with moving isolated properties where necessary.	Can the LA please clarify the intention of fully defending communities in this plan, individual properties, etc and how it will deal with isolated properties that they consider may need relocating, and in which epoch? Also, please clarify the timings for testing out the coastal change funding sought.	Jim Hutchison	11-Feb-10	The sentence in the summary report describes the outcome of the Plan, while App E is the objective formulated at the start of the process. Not sure where the suggestions are re. use of Coastal Adaptation Fund. Re. isolated properties: see policy statements: this depends on future developments, to be monitored.		QRG Review continues on next line in column G		
31.2		15-Jun-10				The response suggests no consideration of resilience/adaptation options will be considered in this plan? I'm not sure this is really the intention? Can the team clarify. Not satisfied.	Clarity required please.	Jim Hutchison	26-Aug-10	Continued defence of established settlements is realistic because there is enough space seaward of the communities to compensate for full loss of the intertidal area. In addition, given that the land is lower to the landward side of the settlements, they are an obvious technical limit for Managed Realignment (as the next natural limit is the high ground approximately 20km away).  If enhanced knowledge indicates the need for Managed Realignment which covers properties, then resilience or adaptation will certainly be required. Given that there is a large area without properties where Managed Realignment could take place, this is unlikely to be required until epoch 3.	No changes made	Satisfied	Jim Hutchison	13-Sep-10
32.1		21-Dec-09	Technical	Thematic Reviews	Appendix D	I am interested in knowing more about the regional strategies and strategic plans, and local plans and policies that will shape this SMP2. A separate concise section in the report would assist. [PB]  This is where the planning system can be usefully discussed, but I can see no section on this. For example the Compulsory Purchase Act 2004 on Regional Spatial Strategies (RSS's) etc. [JH]  A good level of engagement with spatial planners is important through both the development and implementation of the SMP [SJ]	Can the LA please clarify and confirm that such a section is included in the plan? [PB]  Can the LA please explain where the existing planning system and planning policies set by National, Regional and local planning authorities is set out and how these impact on the preferred policy options? [JH]  Could the Client Steering Group (CSG) comment on the extent and effectiveness of engagement to date, and confirm that appropriate actions will be included in the Action Plan to ensure good links are maintained? [SJ]	Peter Bide Jim Hutchison Steve Jenkinson	11-Feb-10	Section 1.1 of the main document indicates the links; this could be expanded. If it is felt there is a need to go into specific detail on the LDFs and RSSs and their status, then I agree App D would be a good place. As described in section 1.3.1, all LAs were represented on CSG and EMF by planners, and they have been fully involved in shaping the plan.		QRG Review continues on next line in column G		
32.2		26-May-10				Section 1.1 isn't adequate, it merely mentions RSS and LDF. It should say which LDFs link to the SMP, what any relevant policy says, and what the plans are to link the SMP into the work lpas are doing on their LDFs. (PB)  Have all 3 questions been answered? Not satisfied. [JH]  Satisfied subject to minor text change. (SJ)	The team should expand on the current text. (PB)  A final decision by the CSG is needed here. (JH)  I suggest 1.3.1 is re-worded to include your response here re the involvement of planners (as opposed to simply planning authorities). (SJ)	Peter Bide Jim Hutchison Steve Jenkinson	26-Aug-10	Re. PB's comment and JH's comment 1: The SMP provides a sound evidence base, which will be taken forward by the local authorities to form part of their LDF Core Strategies, in setting appropriate policies.  At the time of SMP preparation the Lincolnshire LPAs (E. Lindsey, Boston and S. Holland) hadn't produced LDF core strategies as they were waiting for the policies drafted through the Lincolnshire Coastal Study which was due to go to public consultation through the RSS review. On 6 July 2010, the Secretary of State revoked the East Midlands Regional Plan (RSS8), published in March 2009, and following this, we are working with the LPAs to find an interim position.  The BC of King's Lynn & West Norfolk were developing their LDF during the SMP preparation, and this is still (at time of writing) in early draft form, therefore no final policies were available during the development of the SMP.  Re SJ's comment 2 - text has been added to clarify.	Re. PB comment and JH comment 1 - text has been added to page 3 of the main document to clarify. "On 6 July 2010, the Secretary of State revoked the East Midlands Regional Plan (RSS8), published in March 2009.  In the absence of the RSS, Government advice is that local authorities should continue to work with the Environment Agency and across administrative boundaries, to plan development that addresses flooding and coastal change."  Re SJ's comment 2 - Text added into section 1.3.1 on page 9 and 10 of the main document. Now reads "Interaction between the SMP and land use planning is essential, so all planning authorities have been involved as full partners and were represented on both the Client Steering Group and Elected Members Forum by their planners. This involves the following four local authorities and two county councils"	Satisfied	Matthew Bigault pp Peter Bide Jim Hutchison Steve Jenkinson	13-Sep-10

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33.1		21-Dec-09	Technical	Thematic Reviews	Appendix F - Section F6.2.1	Does this latest thinking and assessment make previous data and conclusions redundant?	Can the LA please clarify?	Jim Hutchison	11-Feb-10	The choice was made to include the earlier stages and work and explain clearly via text boxes that section F6 describes the current state of knowledge. We could spend time on updating all the earlier work and turning the Appendix into an idealised version; is that worth it?		QRG Review continues on next line in column G		
33.2		15-Jun-10				Some clarity and a cross reference could suffice depending on the text that is referred to here. Suggest the CSG reconsider worthwhileness. Not satisfied.	Clarity and a cross reference may suffice?	Jim Hutchison	26-Aug-10	Clarity is provided as text box on page F1, Appendix F.	No changes made	Satisfied	Jim Hutchison	13-Sep-10
34		21-Dec-09	Social	Engagement	Appendix B	This appendix sets out in some detail the stakeholder engagement process.	Could the LA confirm that they will be providing not only evidence of consultation with the public, key stakeholders and Elected members, but also an audit trail recording stakeholder comments and how these have been dealt with?	Steve Jenkinson	11-Feb-10	We currently have produced a consultation report which includes details of the feedback received from the SMP partnership and wider stakeholders, with an attached comments log on how we propose to incorporate their feedback. A formal response is being drafted by the group to respond to all consultees.		Satisfied	Steve Jenkinson	26-May-10
35	Showstopper	21-Dec-09	Social	Linkages	Appendix B Page B12	Use of Mr Boggis as a case study.	Use of such cases are not appropriate in an SMP2 and in any case, the decision quoted has now been overturned upon appeal. Please remove all such examples from the SMP2	Jim Hutchison	11-Feb-10	We propose to remove all references to Mr Boggis and this case.		Satisfied	Jim Hutchison	15-Jun-10
36		21-Dec-09	Social	Resilience/Adaptation	Appendix E - Page E56/57/58	There is likely to be some movement of property in epoch 2 and 3 required, but it is not clear what mechanisms will be used, especially as there are statements elsewhere about protecting "all" property. Also, where there are statements about continuing to defend in epoch 1, it is not clear if this is because of residual asset life or other reasons?	Can the LA please explain and clarify in the text? Is there a need for use of the coastal change funding policy here?	Jim Hutchison	11-Feb-10	The appendix describes the impact of policy options which have not been selected. Within these options, the main reason for having HTL in Epoch 1 was to allow time for adaptation.		Satisfied	Jim Hutchison	15-Jun-10
37.1		21-Dec-09	Social	Resilience/Adaptation	PDZ2	A case is being made in this zone to start considering coastal adaptation now, which appears to be a good idea.	What plans are set out in the report for adaptation and where is it planned and for when? As for a continued case for this unit, the SMP is only assessing the coastal processes and planning policies etc, that exist, and a full analysis of all the available evidence is required.	Jim Hutchison	11-Feb-10	The SMP has been the mechanism to start the partnership process on PDZ2, which is now underway. The draft SMP (policy statement) mentions the meeting on 24 August and refers to the Action Plan. Not sure what is meant with the last sentence in the 'action required' column.		QRG Review continues on next line in column G		
37.2		15-Jun-10				Satisfied.	A cross reference to this reference would be helpful.	Jim Hutchison	26-Aug-10	The reference to the meeting on 24 August is in section 4.3, page 84, first (boxed) paragraph.	No changes made	Satisfied	Jim Hutchison	13-Sep-10
38		21-Dec-09	Social	Risks and Impacts	Main Document Page 51	The Summary notes that NAI will require adaptation of society at a local, regional and national scale.	Please could you expand on how NAI policy in the Wash will impact society on a national scale, i.e. how will society in the south-west of England or London, feel the impacts of NAI in Eastern England?	Emma Fisher	11-Feb-10	Area, number of people and extent and quality of agricultural land (about 50% of grade 1 land in England). Could add words to that effect if needed?		Satisfied	Emma Fisher	26-May-10
39.1		21-Dec-09	Social	Sustainability	Appendix E - Page E13	For agriculture, there is an aim to ensure impacts to Grade 1 and 2 land are acceptable.	Can the LA please clarify who will be judging this acceptability, and how it will be done?	Jim Hutchison	11-Feb-10	This is part of balancing all the different principles. It is not possible to give hard figures, because it needs to be balanced against other impacts (e.g. on habitats). The SMP has assessed the impact of the policies on each principle (via the objectives) and presented / visualised the results. The decision (i.e. finding the right balance) is then for the Partner Authorities (CSG and ultimately EMF). The text box of Principles (1.4) explains this; is there a need for further clarification in the document, e.g. in 2.4.2?		QRG Review continues on next line in column G		
39.2		15-Jun-10				This approach is acceptable, however, as stated in the SMP Guidance Note, where local decisions are not in line with Treasury Guidance, either technically, economically or environmentally, these need to be clear in the report, ensuring that all readers are clear of the impacts of such a choice. Not satisfied.	Need to be clear where policy options have been selected on advice of those preparing the plan that are against National Guidance.	Jim Hutchison	26-Aug-10	As stated by national guidance, technical, economic and environmental factors were considered in choosing the policy options for this area. However, due to the extent and predominance of grade 1 and 2 agricultural land in the area, the impact on agriculture was also considered in the assessment and production of the plan	No changes made	Satisfied. Assume this is clarified to all that read the reports	Jim Hutchison	13-Sep-10
40.1		21-Dec-09	Social	Sustainability	Appendix E - Page E61 AND Section 2.4 in the main report	The concept of local rebalancing appears to be unique to this plan. Some clarification on what this is attempting to achieve is required.	Can the LA please explain this concept and why it is appropriate to this plan and no others? Please explain how it impacts on the final decisions when comparing it to a truly sustainable approach.  It seems to me that the high number of entries on timing in Text Box 2.2, Page 61 is because the plan is left with too many uncertainties, and clearly more than when SMP1 was completed. Can the LA comment and clarify the reasons for this?	Jim Hutchison	11-Feb-10	Local Rebalancing was only an option in appraisal (at the scale of PDZ1, which has been agreed by CSG / EMF to be the appropriate scale of decision making in this plan). It captures an alternative to full HTL for the whole PDZ (which was not selected). The entries on timing just reflect the importance of adaptation and the range of sectors that could be affected; not sure there is a clear link here with the uncertainties.		QRG Review continues on next line in column G		
40.2		15-Jun-10				Can the team finish the response by clarifying if/where local rebalancing was used in lieu of the HTL policy option? Not satisfied.	Clarity is required.	Jim Hutchison	26-Aug-10	Local rebalancing was not chosen as the preferred option in any of the PDZs.	No changes made	Satisfied	Jim Hutchison	13-Sep-10

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41.1		21-Dec-09				It is confirmed in with present management (WPM) for PDZ2 that there is a significant risk to life in the semi-permanent dwellings. Regardless of caravan owners wishes to contribute to hold the line options, this appears to be an unsustainable position (unless it can be shown to be feasible and affordable to raise and thereafter retain these defences to a higher standard in the future). Spatial Plans and community strategies are a more suitable arena for resolving these issues than the SMP.	Please include an action for Spatial Planning to deliver climate change adaptation with safe and sustainable development uses in flood risk areas. This might provide roll back exception policies to facilitate relocation of existing high risk sites.	Julian Payne	11-Feb-10	Exactly, which is why the SMP does not provide a firm policy but a process to come to the right solution. Of course emergency planning and potential relocation can be elements of this. But for the SMP to make that decision (instead of a process driven by spatial planning) would be wrong, hence the draft policy.		QRG Review continues on next line in column G		
41.2		26-May-10				Action 0.3 "Ensure that local and regional development planning documents take account of SMP policies and flood and erosion risks" is procedural, only repeats National Planning Guidance, and gives no direction on what Planners need to do. Translating SMPs into Spatial Plans noted "none of the Plans make it sufficiently clear what actions are expected of RPBs and LPAs to implement SMP objectives via development plans", "A particular problem of the SMP2s is the lack of clarity on occasion between what seems to be expected from management policies ... and what this might mean for spatial planning responses", "The Action Plan components of the SMP2s do not always appear to have been written with planning bodies/authorities in mind.	Revise the current procedural action 0.3 with reference to Translating SMPs into Spatial Plans Volume2. Include a new spatially defined action that gives a clear direction to planners to establish a policy to deliver climate change adaptation with safe and sustainable development uses in this flood risk area.	Julian Payne	26-Aug-10	The local authority, whose planners have been fully involved in the SMP and specifically in starting the partnership approach for PDZ2, is already working on a planning protocol for this area. This will then develop in parallel with the development of the long term sustainable solution through the partnership approach. Therefore, we don't think a separate entry in the action plan is needed.	No changes made	QRG Review continues on next line in column G		
41.3		13-Sep-10	Social	Sustainability	Page 54 DPZ2 summary	This approach may work whilst current personnel and priorities remain as they are, but it is not robust in terms of securing planning Policy, delivering long term outcomes, or ensuring appropriate weight is given by any further development plan. Certainly if adaptation is required prior to 2025 (as the SMP indicates on page 65) much stronger planning support than a protocol will be required. Inclusion of a specific action will also support Local Area Agreement (LAA) evidence of climate change adaptation. By comparison, I can't see any negative impacts of inclusion of appropriate action, even if this just ends up supporting the protocol/engagement that is already being worked on. After all this is the key issue the SMP raises for this PDZ.	The team should include an action which promotes consideration of adaptation planning policy. I suggest that the action is for the inclusion of a Climate Change Adaptation policy in the next Local Development Framework, to help manage the risk (including the risk of life) in the Wolferton Creek to South Hunstanton area – high priority, responsibility of Borough Council of Kings Lynn and West Norfolk.	Julian Payne	04-Oct-10	The partnership approach referred to in the last response does not refer to collaborative approach in Actions 2.1 and 2.4. The planning protocol which has now been approved for implementation by the Borough Council of King's Lynn & West Norfolk (BCKLWN) was developed in partnership with the Environment Agency. It is produced as a tool for driving the fulfilment of the requirements of NI188 (Planning to adapt to climate change). The protocol focuses on development of the long term sustainable solutions and adaptation to climate change whilst encouraging development away from the flood plains. Also, BCKLWN have been successful in obtaining Pathfinder funding for a project to: involve local business interests, stakeholders and the Environment Agency in evaluating options for establishing an equitable mechanism for securing contributions towards the long-term cost of coastal defences and to investigate alternative actions such as rollback and other adaptation measures.	No changes made	Satisfied, given the works being carried out under the Pathfinder project and the steer for the planning system that this will result in.  It has been explained that the Pathfinder work is pursuing both privately supported maintenance on the defences (and that this may well need to include upgrading these to address increased sea level rise), but also, should this not provide an acceptable or viable solution, the other work package is exploring possible adaptation options. The second half is intended to have an output case direction to  This approach is supported by the de facto adaptation measure included within the planning protocol - by way of the formalised end date for temporary permissions.  I accept therefore, that whilst the Pathfinder work is progressing the exploration of options in detail, and crucially with significant community buy in, inclusion of a specific adaptation action may not be helpful. As such, providing the	Julian Payne	06-Oct-10
42.1		21-Dec-09	Social	Sustainability	Appendix C - Page C7	A statement is given that "a ban" on planning for land claim has been in place for many years in the Wash Area.	Can the LA please clarify the statements on banning land claim in the Wash area. Please provide references and clarify the impacts of this.	Peter Bide	11-Feb-10	This was a moratorium in Lincolnshire's 1978 Structure Plan. Impacts: no more reclamation... Will add reference in the text.		QRG Review continues on next line in column G		
42.2		26-May-10				The response to my comment on 48 says that the 'ban' was a moratorium in Lincolnshire's 1978 Structure Plan. Surely there is a more recent plan than this? What does it say?		Peter Bide	26-Aug-10	More recent plans do not contain any explicit statements on a ban on reclamation which means that the Moratorium is no longer in place.	No changes made	Satisfied	Matthew Bigault pp Peter Bide	13-Sep-10
43.1		21-Dec-09				Conservation Objectives are not Natural England's "interpretation" of conditions needed to maintain favourable condition. They form our statutory advice to operators and to competent authorities and are used as the baseline against which to evaluate possible damaging operations.	Please revisit text in liaison with local Natural England.	Siobhan Browne	11-Feb-10	All SEA related comments are being attended to in an SEA Addendum (expected to be published next week). The comments of Liz Galloway and Siobhan Brown are all covered within the addendum which provides a more extensive explanation of how the SEA evolved, the issues raised and the manner in which decisions were made.		QRG Review continues on next line in column G		

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43.2		26-May-10	Environmental	Conservation	Appropriate Assessment, para 3.2.	I note the production of an SEA Addendum. However, I recommend that the first sentence in paragraph 3.2 is changed.	Replace first sentence in para 3.2 with following two sentences: "Conservation objectives form Natural England's (NE) statutory advice to operators and to competent authorities and are used as the baseline against which to evaluate possible damaging operations. They set out the detailed habitat and environmental conditions necessary to maintain favourable conservation status and site integrity."	Simon Bates pp Siobhan Browne	26-Aug-10	The Addendum cannot be updated. The additional wording has been added to the Statement of Environmental Particulars under the consultation section.	No changes made	Satisfied	Simon Bates pp Siobhan Browne	13-Sep-10
44.1	Showstopper	21-Dec-09	Environmental	Conservation	Main Document	Hunstanton cliffs, management for Epoch 3. Intent is to prevent erosion when cliff erosion starts to threaten cliff top properties and the road. This site is designated as a Site of Special Scientific Interest (SSSI) for its geological interest. Management techniques at the base of the cliffs are likely to impact on the interest feature.	Please revisit. Further clarification needs to be sought with local Natural England as to what can be carried out at the site.	Siobhan Browne	11-Feb-10	See issue 29. Again, this issue is essential for policy development in PDZ4, but so are the values on top of the cliffs, and the uncertainty surrounding this. In partnership with the local (maritime and planning) authority and Natural England the decision was made to use this SMP2 to raise the need for this future decision now by having a dual policy, with the aim to firm it up in the next SMP. Suggest for local NE reps to discuss with QRP reviewer. No changes suggested for now.		QRG Review continues on next line in column G		
44.2		26-May-10						The policy for Epoch 1 & 2 is NAI. For Epoch 3 NAI/HTL. Having consulted Nick Tribe and Andy Millar of NE, their stance is that this dual policy is acceptable provided monitoring continues, and informs a future "integrated strategy study" as advocated in the plan. At this stage, NE would <u>not</u> support concrete defences at the toe of the cliffs but might support actions such as beach nourishment.	In policy statement PDZ4, it would be helpful to state that: "Natural England would not support concrete defences at the toe of the cliffs".	Siobhan Browne	26-Aug-10	We acknowledge this concern, and the local Natural England team (specifically Nick Tribe) have been engaged following receipt of Siobhan's comment. They have accepted that this statement will be raised in SMP3.	No changes made	Satisfied
45.1		21-Dec-09	Environmental	Linkages	Main Document; Appendix K	The WFD Assessment has been completed but there does not appear to be any discussion in the Main Report on how the outcomes influence the plan, and what actions will need to be taken forward to the Action Plan.	Could the LA please comment on this, and explain how this might be addressed?	Steve Jenkinson	11-Feb-10	This may need adding to the Action Plan and Cons Report before sending to CSG. The WFD assessment for this SMP has not been an explicit driver because the RBMP is relatively vague and the policies are conditional. However, in SMP3 it could become a significant driver for MR (including legal and funding aspects). We need to discuss if this requires clarification within the main report.		QRG Review continues on next line in column G		
45.2		26-May-10						I am not sure if any additions have been made?	The impacts of the WFD Assessment should be briefly commented upon somewhere – PDZ summaries?	Steve Jenkinson	26-Aug-10	This was added in section 3.2 (under the heading of wildlife and geology, page 73)	No changes made	Satisfied
46		21-Dec-09	Environmental	Risks and Impacts	Main Document	It is unclear what will happen to the saline lagoons in PDZ2. If the lagoons are to be lost then replacement habitat needs to be found.	Please provide clarification of what the outcomes of the SMP2 will have on the saline lagoons. (Is this addressed in the AA for example?)	Siobhan Browne	11-Feb-10	It is a key aspect of the AA for PDZ2. Based on NE's consultation response we will suggest rewording of the PDZ2 policy statement to refer to 'legal compliance' as a requirement for PDZ2's long-term solution (stronger than current wording 'environmentally acceptable').		PDZ2 policy statement, page 85, second bullet does include the words: "The environmental impacts of any changes in shoreline management and the associated changes in land use have to be legally compliant. This concerns the...saline lagoons in the southern half of this PDZ."	Simon Bates pp Siobhan Brown	26-May-10
47	Showstopper	21-Dec-09	Environmental	SEA/AA	SEA Report (Appx. L.) L1.6; SMP Consultation, L4.1; Environmental Issues and Assessment Criteria; Annex II Summary of Consultation Response.	Consultation: It is accepted that the main stages of public consultation take place very late in the process. However, there has been an opportunity for feedback from all categories of stakeholders since the inception of the study. It is disappointing therefore that the very slender section on consultation includes comments only from Natural England, English Heritage and the Environment Agency. This is a very narrow sector in terms of influencing such a far reaching plan. What is the nature of the feedback which has produced Strategic Environmental Assessment (SEA) assessment criteria?	Please give more depth to the consultation and/or feedback which has given rise to the assessment criteria.	Liz Galloway	11-Feb-10	All SEA related comments are being attended to in an SEA Addendum (expected to be published next week). The comments of Liz Galloway and Siobhan Brown are all covered within the addendum which provides a more extensive explanation of how the SEA evolved, the issues raised and the manner in which decisions were made.		The response to this item is disappointing in that the Environmental Report should contain a summary of feedback as background to the environmental issues and objectives. Duplication of other documents was not required. However, any further change would require re-consultation and there is not a strong enough procedural (or legal) driver to justify this.	Liz Galloway	26-May-10
48.1	Showstopper	21-Dec-09	Environmental	SEA/AA	Strategic environmental	The success criteria for the SMP2 quality review group states that environmental receptors used in standard methodology include geology and hydrology. However in the SEA for this SMP2 the term "environment" does not include geology and hydrology.	Please ensure that all relevant geological and hydrological issues have been adequately covered within this SMP2.	Siobhan Browne	11-Feb-10	This has been included but needs clearer explanation in the text.		QRG Review continues on next line in column G		

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48.2	Sh	26-May-10			assessment	Agree that inclusion of hydrology and geology as a 'receptor' needs to be explicit.	Amend list of bullet points on page Liii, and in section 1.2 (page 1) of Lii to include "water quality, quantity & hydrological regime" (to replace single word 'water'), and "geology and geomorphology".	Simon Bates pp Siobhan Browne	26-Aug-10	The Addendum cannot be updated. This point has, however, been addressed by the Statement of Environmental Particulars.	No changes made	Satisfied	Simon Bates pp Siobhan Browne	13-Sep-10
49	Showstopper	21-Dec-09	Environmental	SEA/AA	SEA Report: Throughout; tables and text, particularly appraisal tables 5.1 - 5.4 and Appx I, Tables 1 - 5; L 4.1.	The structure of the SEA Report is clearly set out and good to have a separate Report. However, the SEA process requires that a Report evidences the analysis and quantification of impacts in a transparent way so that it leaves the reader with a clear 'balance sheet' to support the decisions taken and an understanding of the feasibility or otherwise of mitigating the negative impacts. Although explaining the SEA process and stages clearly, the text does not deliver to this agenda. It focuses on process and intention but leaves the reader guessing about feedback from consultation so far, relative significance of impacts or the feasibility of mitigation.	Provide an SEA Addendum which gives: (a.) background on the feedback from consultation to date (b.) a transparent and quantified assessment of potential impacts of preferred options (c.) the implications of the environmental input to the decision making process and (d.) the mitigation to which needs to be made in order to implement the plan, its achievability and the commitment which is made to delivering it. (e.) Ensure that appraisal follows through from one set of analysis to another. The Report needs to be moved forward beyond a discursive stage into a clear statement of implication and commitment. See also specific comments on appraisal and mitigation below. (f.) Ensure that colour used on tables (which is potentially useful) is explained as appropriate in the text (g.) Note and correct statement about revisions through addendum.	Liz Galloway	11-Feb-10	All SEA related comments are being attended to in an SEA Addendum (expected to be published next week). The comments of Liz Galloway and Siobhan Brown are all covered within the addendum which provides a more extensive explanation of how the SEA evolved, the issues raised and the manner in which decisions were made.			Liz Galloway	26-May-10
50	Showstopper	21-Dec-09	Environmental	SEA/AA	SEA Report (Appx. L): Annex I, Tables 1 - 5 and L5 Assessment. Main SMP2 Report, Appx. M	<u>Options Appraisal Methodology:</u> A fair attempt is made at a comparison between complex options and sub-options but the main body of environmental assessment is tentative and vague. Alternatives are discussed but no strong positives or negatives emerge. Where are the best and worst case scenarios, the possible trade-offs in relation to these impacts? Example 1. Table 1, PDZ 1, Epoch 1. The appraisal, based on unquantified assumptions renders the outcome bland and implausible to the reader. Example 2. relates to Appropriate Assessment where the integrity of an internationally designated site may be affected. This potentially significant impact is not recorded in the impact assessment tables. An impact assessment must indicate potential effects, even if best and worst case scenarios are used, otherwise the analysis is meaningless. Annex I, SEA Report: (a.) the many values of "minor positive" against an action which merely maintains the status quo is misleading. Surely, this should be recorded as "neutral"? (b.) Where an option, e.g. to HL at Hunstanton has positives and negatives, these don't necessarily cancel out into a neutral unless the values in each are similar.	Re-visit the environmental assessment in Annex 1, making sure that the potential significance of impacts is reported. Ensure that impact appraisal links through receptors, assessment criteria and consideration of alternative options to give a transparent analysis of the potential impacts of carrying out the plan. (1.) (Example 1 illustrates) Develop more depth of analysis in the impact assessment. (2.) (Example 2) Re-consider specifically the impact of the appropriate assessment outcome in PDZ 1.  With respect to Annex I : (a.) Reconsider value of minor positive throughout. (b.) Justify 'neutral' assessment.	Liz Galloway	11-Feb-10	All SEA related comments are being attended to in an SEA Addendum (expected to be published next week). The comments of Liz Galloway and Siobhan Brown are all covered within the addendum which provides a more extensive explanation of how the SEA evolved, the issues raised and the manner in which decisions were made.		The majority of issues have been addressed in the Addendum. The SEA would have provided a better background to the reader had the Scoping stage feedback been summarised, providing a lead into the SEA objectives/assessment criteria. Similarly a clearer series of mitigation measures (as opposed to monitoring) and an indication of their availability/feasibility would have been helpful to the reader. However, the omissions now outstanding are not comprehensive or legally significant enough to justify further change or consultation.	Liz Galloway	26-May-10
51	Showstopper	21-Dec-09	Environmental	SEA/AA	SEA Report (Appx. L): L 2.3 Mitigation and Monitoring L 5.1.1 and L 5.2 Assessment and L6 Mitigation and Monitoring.	<u>Mitigation: feasibility: commitment:</u> The aspiration in L2.3 was that, "any mitigation ... will be clearly specified in this Report". The intention to "consider" mitigation occurs repeatedly but no attempt to quantify or to accept that in order to implement the plan, there will be a need to find x ha of replacement land of a particular type and furthermore, that it either exists or that (in HD terms) we are in the realms of Imperative Reasons for Overriding Public Interest (IROPI).	Building on quantified impact assessment, mitigation requirements need also to be quantified, and their availability (or not) explained. If not, further measures or legal requirements should be stated.	Liz Galloway	11-Feb-10	All SEA related comments are being attended to in an SEA Addendum (expected to be published next week). The comments of Liz Galloway and Siobhan Brown are all covered within the addendum which provides a more extensive explanation of how the SEA evolved, the issues raised and the manner in which decisions were made.		Satisfied	Liz Galloway	26-May-10

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52.1	Showstopper	21-Dec-09	Environmental	SEA/AA	Appendix M	How are the AA and RHCP linked? And is the AA likely to require Secretary of State (SoS) consideration? What is NE advice on this? [JH]  Although the NE Letter of Support (comfort letter) is not currently required, some form of sign up would be reassuring in view of the Habitats Directive issues. [LG]	Can the LA please explain the links, and also NE's views on IROPI? What are the next steps? Will the Action Plan set out any requirements and opportunities? [JH]  Please advise what formal support for the SMP has been provided or will be provided by Natural England. [LG]	Jim Hutchison Liz Galloway	11-Feb-10	All SEA related comments are being attended to in an SEA Addendum (expected to be published next week). The comments of Liz Galloway and Siobhan Brown are all covered within the addendum which provides a more extensive explanation of how the SEA evolved, the issues raised and the manner in which decisions were made.		QRG Review continues on next line in column G		
52.2		26-May-10				Can the team conclude the IROPI requirements, either by explaining the need for the HRA to be considered by the SoS or a letter from NE accepting the HRA and the plan? A cross reference to where the letter is held would be sufficient. Not satisfied. (JH)  The Addendum text is satisfactory for the present but the situation is not yet fully resolved and should be monitored to ascertain whether a further addendum (and consultation) are needed as a result of further change. (LG)	My issue not addressed here, please consider further. (JH)  None. (LG)	Jim Hutchison	26-Aug-10	The letter from NE is now available	No changes made	Satisfied	Jim Hutchison Liz Galloway	13-Sep-10
53.1	Showstopper	21-Dec-09	Economic	Affordability	Appendix H - Table H5	Given the low Benefit Cost Ratio (BCR) set out here is there not any more cost effective method to give a better BCR? If there is no financial support to implement this option, what does this mean for this preferred option?	Can the LA please confirm that there no more cost effective solution and what the LA plan if this solution is not affordable?	Jim Hutchison	11-Feb-10	For the local maritime (and planning) authority, it is obvious that the benefits of Hunstanton Promenade / Seafront outweigh the costs of holding the line, but at this stage this is judgement-based only. Will assess relevant text throughout and ensure this is clear. It will be important to include an Action for the local authority to develop a plan, including appropriate economics.		QRG Review continues on next line in column G		
53.2		15-Jun-10				Can the team please add the appropriate section [in the adjacent box] that confirms the Local Authorities views on this. I also assume that all operators in the plan area is aware of Treasury rules on spending public funds on uneconomic schemes? Not satisfied, but the cross reference could be sufficient if the appropriate text is already in the reports?	Please make additions as suggested.	Jim Hutchison	26-Aug-10	The following text was added to section 3.3 (pg77) in the final SMP main doc:  "The seafront and promenade are fundamental for Hunstanton's resort function, which is essential to the economy of Hunstanton and very important for the surrounding area. Tourism accounts for over half of all employment in Hunstanton, and around 1/6th of all tourism spending in West Norfolk takes place in Hunstanton. The importance of the seafront and promenade is highlighted by the role it plays in the July 2008 Masterplan, which has informed the LDF. A range of developments which depend on the existing sea defence is currently being implemented. Based on this, the Hold the line policy is judged to be viable. Appendix H provides more detailed information. The SMP's action plan includes an action to provide a more quantified assessment to confirm this judgement."	No changes made	Satisfied	Jim Hutchison	13-Sep-10
54.1	Showstopper	21-Dec-09	Economic	Affordability	Appendix B; Appendix E	From an examination of the documents used for public engagement, the topic of affordability does not appear to have been covered. There is also no reference to affordability in Appendix E.	Can the LA please explain how affordability was explained to stakeholders and the public? Where is affordability of the plan discussed?	Jim Hutchison	11-Feb-10	Agree that Policy Statement is very concise, but it was explicitly decided in the EMF not to include statements on economics / affordability in the policy statements, but instead to include a general statement about funding in section 1.1 (last line of first para on page 2).		QRG Review continues on next line in column G		
54.2		15-Jun-10				This is misleading as those in each PDZ needs to know what the CSGs views are on affordability, noting that affordability issues will more likely become more of an issue in the coming period. Not satisfied.	Please add clarifying text.	Jim Hutchison	26-Aug-10	The economic viability for each PDZ is discussed in section 3.3, and we have included more explicit statements about funding there.	No changes made	Satisfied	Jim Hutchison	13-Sep-10
55.1	Showstopper	21-Dec-09	Economic	Baseline Scenarios & Policy Options	Appendix E - Page E100 [although this is also stated in E44 and other pages]. Also, P28 in the Main Report as a typical example	The policy option appears to confuse the terms "sustain" and "maintain" with respect to defence standards. It is not the role of the SMP to consider what standard of defence is required but rather when defence residual life suggests that key decisions will need to be made, for example, to HtL or NAI, etc. Unless an approved Strategy has been used in the plan preparation?  Also, page 28 in the main report is another example of using the term "sustain". Is this because we have an existing Strategy report that has already made an economic case for such an improvement?	Can the LA please confirm that a baseline of ongoing maintenance is assessed in the plan to allow decisions over the 100 year period to be taken? Also to confirm that an existing long term Strategy is not available that may have already assessed future standards of defence? Also clarify the improvement "sustain" option where used, either from an existing Strategy report, or similar?	Jim Hutchison	11-Feb-10	Not clear what the problem is with App E: the draft policy is P4, which seems to us to justify use of the word sustain (see issue 20 for discussion why flood risk policy is vital at SMP level for this PDZ). The word 'sustain' on page 28 of the main report is used in its colloquial sense; agree this is potentially confusing and will change.		QRG Review continues on next line in column G		

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55.2		15-Jun-10			example.	The requirement here is to ensure that maintain and sustain is properly used and all that is required is a cross reference to the definitions used in the plan. Not satisfied	Greater clarity is required.	Jim Hutchison	26-Aug-10	Sustain' has been reworded in 2.1.6 (pg28) ("...keep performing their flood defence function"). Definitions of 'sustain' and 'maintain' are provided in the SMP's Glossary	No changes made	Satisfied	Jim Hutchison	13-Sep-10
56.1		21-Dec-09	Economic	Costs and Benefits	Main Doc Sect 4	The policy discussions in the Main report appear to draw forward only very limited discussion of the assessments of economic viability from Appendix H.	The LA should consider summarising the outcomes and discussing the implications of the economic assessment with the discussions on policy options in the main report.	Steve Jenkinson	11-Feb-10	Section 3.3 discusses economics; it has been a conscious choice from CSG / EMF to leave that out of the policy statements.		QRG Review continues on next line in column G		
56.2		26-May-10				Noted, and I see some text has been added at Sect. 3.3 which is helpful.	Suggest taking the opportunity to clarify the difference between economic viability and likelihood of public funding.	Steve Jenkinson	26-Aug-10	There has been a significant amount of discussion in the EMF about the specific wording of anything related to economics. Raising this again will require EMF involvement and in our view adequate reference has been made elsewhere in the document so we have chosen not to add anything further	No changes made	Response noted. There are some messages in the SMP about funding but I was suggesting more emphasis on this important issue. However, I accept the current text has been agreed with the EMF. Satisfied.	Steve Jenkinson	13-Sep-10
57.1		21-Dec-09	Economic	Costs and Benefits	Appendix H Tables H1 to H8	These tables are a useful reference source.	It would be helpful for any additional standard rates that underpin these tables to be set out for information (eg. rates for capital works, property values). This would provide a useful audit trail and enable the data to be re-used in the future.	Steve Jenkinson	11-Feb-10	Section 2 of App H contains the references. Happy to add table of unit costs; helps readability (doesn't matter much for audit trail as the SMP guidance is widely available). Not sure if property values can be listed, as this would just give a long list, and we refer to the NPD.		QRG Review continues on next line in column G		
57.2		26-May-10				I note addition of defence cost table in App. H. With regard to NPD, I could not see a version or date reference.	If someone was to ask the question "what property values did you use?", would the underlying NPD data be available to the CSG, for example?	Steve Jenkinson	26-Aug-10	Approximate costs and values of residential properties were provided by the National Property Dataset as discussed in Appendix H section H2. The Project Team will be archiving all individual project tasks, which will include the NPD data, and this will be made available upon request.	No changes made	Satisfied	Steve Jenkinson	13-Sep-10
58.1	Showstopper	21-Dec-09	Economic	Costs and Benefits	Appendix H and the main report Section 3. Also, main report P52	There is no mention of Modelling & Decision Support Framework (MDSF). Also limited discussion of affordability in this economic section. It is unclear what sensitivities have been undertaken - refer main report P52 as an example. [JH]	Can the LA please confirm which Strategies were used to provide the economic data rather than using the MDSF tool? Please explain where the issue of affordability and possible impacts on policy options are discussed? What and where are the economic sensitivities assessed? [JH]	Steve Jenkinson Jim Hutchison	11-Feb-10	MDSF was not used: as set out in Appendix H section 2, strategies were used for PDZs 1 and 2, while broad scale analysis was used for PDZ3 and 4. Affordability: see issue 54; the relevance per PDZ is covered in the main document section 3.3; will review if this is sufficient. Sensitivity testing has been done for PDZ1 and 2 based on their particular issues, although not explicitly reported as such. For PDZ1 any option with defences is highly viable; we have done an indicative assessment of the long term economics, see Text box 2.1 and App F. For PDZ2 we have used detailed strategy economics and developed these further (App H3.2), concluding that any option will have a marginal BCR which has driven the chosen approach. For PDZ3 any broad scale quantification would show that HTL is unviable, but it is clear that the benefits of Hunstanton Prom need proper economic assessment beyond the SMP. For PDZ4, the economics are determined by uncertainty of long term HTL, which is fully acknowledged in the policy.		QRG Review continues on next line in column G		
58.2		26-May-10				Comments noted re MDSF and sensitivity. [SJ]	RE MDSF, could you please clarify the difference between this and the broad scale analysis? With regard to sensitivity, it would be helpful to briefly explain in the document (App.H) the approach and confirm the outcome along the lines of your response. [SJ]				Steve Jenkinson	26-Aug-10	Re. SJ's comment - We have not used the actual tool but we have followed the approach suggested in the guidance.  Re. SJ's comment - changes have been made to Appendix H.	Re. SJ's comment - no changes made  Re. JH's comment - additional sentence in H2 and new sections (H4.1 and H4.3) have been added to summarise the methodology used and the sensitivity analysis undertaken.

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59.1	Showstopper	21-Dec-09	Economic	Costs and Benefits	Appendix H - Section H3.2, 3.3 and 3.4. Main Document p.68	<p>PDZ 2, 3 and 4 all appear very marginal yet there is no discussion on what is affordable. For example, PDZ3 has a BCR at 0.3:1 but assumes other damages that will be added to the benefit sums. [Costs at £1.65m against damages of £174k is a big difference.] [JH]</p> <p>In my view it is misleading to present a summary of results which starts with "This broad-scale economic review has concluded..." and includes "marginally economically viable" for PDZ 2, 3 &amp; 4. Likewise the last para. in the Main report on p.68 seems to have gone a step further, concluding marginal viability from the assessment with the promise of further benefits to come. As far as I can see there has not been any attempt to quantify additional benefits and for PDZ3, for example, there is quite a long way to go to secure even a BCR greater than 1 to 1. [SJ]</p>	<p>Can the LA please clarify if these are the most cost effective policy options and what sensitivity calculations have been applied to these cases? Can the LA set out the other benefits and the broad brush sums to show the conclusion that this PD3 is economically worthwhile? [JH]</p> <p>Whilst we all recognise the indicative nature of the economic assessment at this level, can the LA comment on the possible implications of the economic assessment for this PDZ, and the lack of inclusion of the economic viability in the promotion of the HTL options in Sect. 4? [SJ]</p>	Jim Hutchison	11-Feb-10	see issue 53 and 58		QRG Review continues on next line in column G		
59.2		15-Jun-10							Unclear on what the team are expecting here? Not satisfied.	Greater clarity required.	Jim Hutchison	26-Aug-10	As indicated in issue 53 and 58, the Project Team (incl the Local Authority) think there are significant unquantifiable benefits from the value of Hunstanton's defence to its economic role. The Action Plan sets out the need to confirm this in the forthcoming strategy study.	No changes made
60.1		21-Dec-09	Economic	Costs and Benefits	PDZ2	There appears to be more risks highlighted for the winter when tourism is less strong. The Main Report [P43] suggests the continuation of this area is a matter for this SMP.	Is there a case for relocating all the high risk tourism assets to one location which may make it easier to make an economic case for further investment? If there is a commitment through the planning system to continue with recreation in this area that is supported by funding, etc, then there is more chance of such a continuation of defending as now. If no commitment, and in particular, no funding, then the sustainability is less likely. Can the LA please comment on the long term sustainability of this unit? (A clear policy appraisal in the report would assist.)	Jim Hutchison	11-Feb-10	See issue 41: these are indeed potential solutions, but it is beyond the SMP: the partnership approach that the SMP has established (and that is underway) is far better. May need rewording of p43; more accurate to say that land use strongly depends on shoreline management.		QRG Review continues on next line in column G		
60.2	15-Jun-10							It would help if wording was to be considered at the appropriate section for clarity and I would be satisfied if the team can do this please.	Greater clarity required.	Jim Hutchison	26-Aug-10	Section 2.4.1 (beginning on pg 63) sets out the issues, and section 4.3 (pg 84) describes the considerations that have led to the selected policy. The policy statement (4.3) indicates explicitly that land use changes are an option. Note that the caravans are occupied throughout the year.	No changes made	Satisfied
61.1		21-Dec-09	Economic	Sustainability	Main Doc p55 last para; pp75, 76	<p>The section on p55 notes that in the long term erosion rates may lead to the need for a specific nourishment programme in front of Hunstanton. This assumes that the nourishment approach is sustainable. Likewise Sect 4.3 states that the long term solution will have to meet a set of criteria. These are all extremely pertinent issues but what is the justification for committing to protecting Hunstanton? [SJ]</p> <p>The case is made for Hunstanton as a Regional tourist centre. [JH]</p>	<p>I suggest that these sections are re-worded to avoid indicating a commitment to a particular management approach. [SJ]</p> <p>What does the Regional Spatial Strategy state for this statement and what investment is being planned to sustain Hunstanton as such? Or is a case made for owners to fund their own defences? A Strategy Review is planned for 2012 and will contributions be considered as part of that study? [JH]</p>	Steve Jenkinson Jim Hutchison	11-Feb-10	see issue 53. Section 2.3 only explores the baseline scenarios; the actual policy statement doesn't go into those details, so I'm not sure there is a risk of commitments. The strategy review will in principle cover the flood defences south of Hunstanton, not the high ground, but combining them (including the Cliffs) is being explored.		QRG Review continues on next line in column G		
61.2	26-May-10							<p>Comments noted. (SJ)</p> <p>Can see nothing in response to my issue raised here. Not satisfied (JH)</p>	<p>Could the team confirm whether any changes have been made in the document please? (SJ)</p> <p>Please respond to the question. (JH)</p>	Steve Jenkinson Jim Hutchison	26-Aug-10	<p>Re. SJ's comment - section 2.3 has not been reworded because this concerns the baseline scenarios, not the proposed policy.</p> <p>Re. JH's comment - as indicated in issue 53 and 58, the team (incl the Local Authority) think there are significant unquantifiable benefits from the value of Hunstanton's defence to its economic role. The Action Plan sets out the need to confirm this in the forthcoming strategy study. Local contributions are likely to be a key issue there, as highlighted in section 3.3 (beginning pg 76).</p>	No changes made	<p>Response noted. Satisfied. [SJ]</p> <p>Satisfied [JH] Contributions will be important in this location and the CSG should make this clear at every opportunity.</p>
62.1		21-Dec-09	Administrative	Data and Mapping	General	Does the plan summarise the number of properties, (commercial and homes), agricultural land, cultural and heritage losses that may be impacted by a NAI policy, including which epoch?	Could the Client Steering Group (CSG) advise if and where this data is presented please?	Steve Jenkinson	11-Feb-10	For PDZs 1 and 2 we have not carried out full appraisal of NAI because this was not needed to conclude that NAI is not a realistic option. For PDZs 3 and 4 the data for loss of properties, historic assets and agricultural land under NAI is available from option appraisal. However, it was decided not to include the full set of appraisal tables in the documents: Appendix G only contains the data for the draft policy. We could choose to add this information if deemed necessary.		QRG Review continues on next line in column G		
62.2	26-May-10							We are keen that data used to inform the SMP is accessible and supported by adequate metadata. The extent to which this is included within the published SMP is a judgement call for the CSG – for example, how much would it add to the reader's understanding, is it easy to add in? Importantly however the data should be available if required.	Could the team confirm their approach please?	Steve Jenkinson	26-Aug-10	The Project Team will be archiving all individual project tasks to ensure that the background reports are available as a project record	No changes made	Response noted. It will clearly be beneficial for data collected and used to inform the development of the plan to be archived and accessible. Satisfied.

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63.1		#####	Administrative	Monitor/Review	Appendix B - B10	There are no statements about how the public and stakeholders have been involved since SMP1.	Can the LA please set out how the SMP1 Action Plan has been used and how engagement has been maintained?	Jim Hutchison	#####	Need to review further		QRG Review continues on next line in column G		
63.2		15-Jun-10				Awaiting details in response to this issue. I would hope this is all recorded in Appendix B? Not satisfied.	Please provide further details.	Jim Hutchison	26-Aug-10	Please see Appendix B, Page B3. There is no specific Action Plan in SMP1. The dominant theme was one of further research and monitoring to improve the various aspects of future SMPs	No changes made	Satisfied	Jim Hutchison	13-Sep-10
64.1		21-Dec-09	Action Plan	Coastal Processes	Main Doc p20, p41; Sect 4.2 PDZ1 p71 last para; Appendix C Sect C8	Setting medium and long term policy appears to be fundamentally dependent upon further monitoring and research. Appendix C contains a brief discussion on the rate of sediment infilling compared to sea level rise, noting that there will be a point in the future when the current process is reversed leading to potentially large scale erosion. This is a critical factor in the future management of the Wash.	I am interested to know what monitoring and research activities are planned, and will enable more robust decisions over policy option to be made, compared to existing data. Where in the plan is this discussed? Also, could the LA confirm that the Action Plan sets out clear measures to help find the right balance between sustaining the habitat and defending agricultural land?	Steve Jenkinson	11-Feb-10	Action Plan, which will be linked directly to the Coastal Monitoring Programme to which we have contributed. I would see no specific actions on the short term to help find the right balance: it seems to me that SMP3 will have to revisit the issue based on monitoring results and further insights at that point in time.		QRG Review continues on next line in column G		
64.2		26-May-10				Response noted.	Is this the full response – appears to start halfway through a sentence?	Steve Jenkinson	26-Aug-10	Apologies, the response was written for project team use but then left in as the full response. The response should simply start "This will be addressed in the Action Plan..."	No changes made	Given that SMP3 I would guess is likely to be undertaken within the next 10 years or so, this is probably a reasonable point of time to review new data. As far as I can see adequate actions (studies and monitoring) are included in the Action Plan to help provide the	Steve Jenkinson	13-Sep-10
65		21-Dec-09	Action Plan	Decision Making	Main Document	Whilst policy options are not limited to one only for future epochs the plan explains that this is justified due to the uncertainty and future requirements for improved understanding set out.	Please make a clear statement in the action plan as to the actions required to remove the uncertainty, the links to SMP3 and the links to the Regional Monitoring Programme.	Graham Lymbery	11-Feb-10	We would amend accordingly.		Satisfied	Graham Lymbery	26-May-10
66.1		21-Dec-09	Action Plan	Engagement	Main Document Sect 5	Although various references indicate the inclusion of an action plan, no provisional list of actions is included. This might have helped readers understand what will be done to put the SMP into practice and allow stakeholder comment on proposed actions and although optional in the guidance, could have avoided the need for further consultation on the Action Plan. [AP]  As far as I can see there is no indicative or provisional Action Plan included in this consultation draft. [SJ]	Develop Action Plan for inclusion in section 5 in the final version and explain how it has been consulted on. [AP]  Could the LA comment on the proposed process for drafting, agreeing and consulting upon the Action Plan? Also that the Action Plan will include: - lead responsibilities, timetables for actions, approximate costs and indicative funding sources, links to the Medium Term Plan (MTP)? - a process for incorporating revised data, guidance or policies? - a process for monitoring progress with actions and success criteria? web management activities? [SJ]	Andy Parsons Steve Jenkinson	11-Feb-10	Yes, agree in hindsight that that may have been a good idea. We did develop a first draft action plan in the course of Stage 3, but only for CSG use. Consultation on Action Plan is a good point (also raised by consultation response from Norfolk AONB)		QRG Review continues on next line in column G		
66.2		26-May-10				Noted that an action plan has been developed. No comment provided on how this is shared with stakeholders. Actions in the action plan need to be deliverable by members of the coastal group. (AP)  The Action Plan has now been provided, and I have the following comments. - lead responsibilities and timetables identified. Could the CSG comment on any further work planned to assess the affordability of the plan, and how activities will be prioritised not just within this SMP but also perhaps regionally given funding pressures? - the Access database will be a useful tool for managing the Action Plan. Does it break down these actions any further? Will completion of actions (success criteria) be easy to identify and report? - will links be established with the reporting requirements of CLG NI 189? [SJ]	Could the team respond please? Also, what conclusion was reached with regard to consultation on the Action Plan? [SJ]	Andy Parsons Steve Jenkinson	26-Aug-10	Re. AP's issue - The Action Plan was developed in full cooperation with the partner organisations and is going through their full adoption process as part of the SMP. Although consulting on the Action Plan is not a requirement in the SMP guidance, the CSG/EMF which is made up of statutory consultees reviewed the Action Plan several times. Being, a living document, further reviews of the Action Plan can be done as the need arises.  Re. SJ's question re prioritisation - As the Action Plan is set up as a living document, to be managed by a continuation of the CSG / EMF (possibly through coastal sub group), prioritisation will happen when this 'continuous shoreline management process' gets underway.  Action Plan database is currently set up to reflect the tables in the main document. It could easily be expanded to include success criteria.  Re. SJ's question re: CLG. Yes, this needs Environment Agency attention	No changes made	I note the responses to my queries. Regarding prioritisation I understand that some work is now being undertaken in Anglian Region to look across all regional SMP actions to assess funding demands over time and to prioritise as necessary to ensure proposed activities are affordable. With regard to the database, the nature of this is for the CSG to determine taking into account the tools required to assist with implementation, how this will be monitored and reported. Finally on NI 189, I understand that there is some uncertainty over whether this indicator will	Andy Parsons Steve Jenkinson	13-Sep-10
67		21-Dec-09	Action Plan	Linkages	Main Document	PDZ2 - this has clear links to a broader adaptive approach.	Within the action plan the appropriate links should be made to wider adaptation strategy development, to adaptation approaches being developed by the EA/DEFRA and to statutory spatial plans.	Graham Lymbery	11-Feb-10	We would amend accordingly.		Satisfied	Graham Lymbery	26-May-10
68		19-May-10			Main document p15	This only refers to the consultation version of the development and coastal change planning policy. The final policy was published on 9 March 2010 and can be found at the following address. <a href="http://www.communities.gov.uk/publications/planningandbuilding/coastalchange">http://www.communities.gov.uk/publications/planningandbuilding/coastalchange</a> . The final version of the Defra policy has also been published.	Update references to planning policy and to Defra's policy.	Matthew Bigault	26-Aug-10	Section 1.5 of the main document has been updated to include correct details for the Development and Coastal Change Policy and the Defra policy	Section 1.5 (pg 15) of the main document has been updated to include the correct references for the policies.	Satisfied	Matthew Bigault	13-Sep-10

Item Number	Showstopper	Date Matter raised	Criteria Heading	Criteria sub heading	Document Reference	Comment	Action Required	Comment provided by:	Date Response Provided	Response	Section Amended (New para nos and Table nos used in this column)	Review of Response	Comment provided by:	Date comment provided
69		19-May-10			Main document section 3	Having looked at this from the perspective of planning policy I reiterate Peter Bide's comments above (row 33). The amount of uncertainty that is set out in this report will make planning decisions on future development and use of land very difficult to take. PPS25 Supplement: Development and Coastal Change requires local authorities to define Coastal Change Management Areas (CCMAs) in areas affected by coastal change and to use the information in SMPs (alongside other sources of information) to do this. Currently I do not think that the SMP contains enough concrete info to allow the local authority to plan any further than epoch 1 in most of the PDZs.	Has the LA thought about how they would be able to decide whether they would need to define a CCMA and/or how they can consider planning decisions on the coast when it is unclear whether hold the line will continue in the long term and therefore whether coastal change could impact on development?	Matthew Bigault	26-Aug-10	The Local Authority planners have been fully involved in the SMP process and (particularly for Lincolnshire) they have adopted the SMP into their Coastal Study which will inform the LDFs (now that the RSS is unlikely to be finalised). They have particularly supported the conditional approach. We have not discussed the definition of CCMAs with them; we would suggest that this is raised in the first post-SMP EMF meeting.	No changes made	Satisfied	Matthew Bigault	13-Sep-10
		Date Received : 15-Oct-09	Date Collated review circulated: 22-Dec-09	Summary of Review: 22-Dec-09		There are a total of 67 items listed on the Review sheet, of which 19 have been identified as showstoppers. There are a further 75 Quality matters. Please advise Jenny Buffrey if you would like a meeting or teleconference with the QRG to discuss, clarify and agree next steps.			<p>Anglian Central Regional Flood Defence Committee (RFDC)</p> <p>Extract from Minutes of the Anglian Central RFDC held on 22 July 2010, Conference Room, Bromholme Lane, Brampton</p> <p><i>Signing off the Wash Shoreline Management Plan (CFD10/35)</i></p> <p><i>Resolution</i></p> <p><i>A. The Committee approved The Wash SMP 2 (SMP no.4) and recommended its approval to the Environment Agency's Anglian Regional Director.</i></p> <p><i>B. The Committee adopted the policies set out in this SMP.</i></p>					
		Date Received : 4-May-10	Date Collated review circulated: 21-Jun-10	Summary of Review: 21-Jun-10		There are 47 outstanding. Following the review of the resubmitted documents, 2 further items have been added to the review sheet. These are items 68 & 69. Please address all outstanding items by respond in both columns K and L. Please advise Jenny Buffrey of the date that you intend to provide a resubmission for a review of the outstanding items.			<p>Anglian Northern Regional Flood Defence Committee (RFDC)</p> <p>Extract from Minutes of the Anglian Northern RFDC held on 16 July 2010, Boardroom, Kingfisher House, Peterborough</p> <p><i>Signing off the Wash Shoreline Management Plan (NFD10/31)</i></p> <p><i>Recommendation</i></p> <p><i>A. The Committee approved The Wash SMP 2 (SMP no.4) and the proposal to put it forward to the Environment Agency's Anglian Regional Director for sign off.</i></p> <p><i>B. The Committee adopted the policies set out in this SMP.</i></p>					
		Date Received : 26-Aug-10	Date Collated review circulated: 28-Sep-10	Summary of Review: 28-Sep-10		There are 3 items outstanding. This includes 1 Q&P item. Items 17 and 22 are also outstanding but the response to item 3 will cover these. Please advise Jenny Buffrey / Raahil Javaheri of the date that you intend to provide a resubmission for a review of the outstanding items.								
		Date Received : 4-Oct-10	Summary of Review: 5-Nov-10		<p>All QRG matters are now satisfied.</p> <p>The edge of The Wash is characterised by salt marsh and mud flat, and this relatively high foreshore plays an essential role as a natural flood defence. The consequence of this is that future management of the majority of the shoreline is very dependent upon future sedimentary processes and the impacts that sea level rise may have on these. Monitoring has shown generally accretional trends across the salt marsh and mud flat, but there remains significant uncertainty about future foreshore development, and this is reflected in the choice of plan policy options.</p> <p>The majority of the coastline, from Gibraltar Point to South Hunstanton (PDZs 1 &amp; 2), has been assigned a preferred policy option of HtL in Epoch 1, but conditional policy options in the longer term. This policy option uncertainty has been challenged throughout the review process, although it has been widely accepted that the situation in The Wash is particularly difficult to predict. It is disappointing that despite extensive monitoring work, a better understanding of foreshore change has not followed on from completion of the SMP1 in this area (primarily PDZ1). It is clearly imperative that these uncertainties are now reduced through a better informed programme of monitoring and study, and as a high priority. Early start actions have been included in the Action Plan which will inform SMP3.</p> <p>It was also recognised that working through the change and adaptation necessary for coastal communities in PDZ2 will be challenging, and that early and transparent engagement would be essential. This engagement work is already underway.</p> <p>With regard to environmental assessments and reporting, a Strategic Environmental Assessment (SEA) and SEA Addendum have been prepared to a satisfactory standard. Likewise a Water Framework Directive (WFD) Assessment has been undertaken in line with published guidance and found to meet its objectives. Both of these assessments will need to be reviewed as part of the next SMP review (SMP3).</p> <p>The intertidal area of The Wash has a number of international designations (Ramsar, SAC, SPA). Natural England support the conclusion of the Habitats Regulations Assessment that, given the likely timing of the possible impacts and the life-span of the SMP, the plan will have no adverse effect upon the integrity of the site. It was concluded that due to the genuine uncertainties surrounding coastal squeeze and managed realignment issues, further decisions over the detail of Habitats Regulations process are best left until SMP3. However, NE emphasised the importance of undertaking additional studies at an early stage to inform future management, and it will be important to progress the development and delivery of the saltmarsh/mudflat study which is set out in the Action Plan.</p>									

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						A further aspect of the plan that has attracted scrutiny is the use of CFMP type policy descriptors to support the policy options in PDZ1, which reflect the approved CFMP policy for the inland areas. The Client Steering Group considered that the degree of tidal flood risk is an essential element of shoreline management for this PDZ. CFMP-defined flood risk policies have been referenced to provide an indication of future intent regarding the relative level of flood risk to be achieved by flood risk management in the face of climate change. It will be important for the implementing bodies, in line with the action in the Action Plan, to continue to engage with stakeholders to ensure the approach is clear and that expectations are managed.								