The North Norfolk SMP Review - Finalised QRG spreadsheet

SMP Title		**SMP No 05 - Hunstanton to Kelling Hard (North Norfolk)**				**Lead Contact:**	**Ian Bliss**		**Reviewers**	**1. Steve Jenkinson** **2. Phil Perkins**	**Environment Agency** **West Dorset District Council**				
Flood & Coastal Risk Manager		**Richard Houghton**	**Approval Required by Regional Director**		**Paul Woodcock**	**Lead Authority:**	**Environment Agency**			**3. Karl Fuller** **4.Jim Hutchison**	**Environment Agency** **Environment Agency**				
Website		**http://www.eacg.org.uk/smp5.asp**	**Region:**		**Anglian**					**5. Lee Swift** **6. Roger Morris / Joe Green**	**Environment Agency** **Natural England**				
										7. Andy Parsons/Emma Fisher	**Halcrow**				
Item Number	**Shows topper**	**Date Matter raised**	**Criteria Heading**	**Criteria sub heading**	**Document Reference**	**Comment**	**Action Required**	**Timing of Comment**	**Comment provided by:**	**Date Response Provided**	**Response**	**Section Amended (New para nos and Table nos used in this column)**	**Review of Response**	**Comment provided by:**	**Date comment provided**
1		09-Oct-09	Technical	Baseline Scenarios & Policy Options	section 4.3	In management unit PDZ2G.3 the plan states there is a major change in policy option from SMP1. [JH] PDZ 2G discussion notes that there is a significant change from SMP1 policy option for Overy marshes, but no explanation is given here. [SJ]	Can the team please clarify the reasons for the major changes? [JH] Could the Client Steering Group (CSG) explain the difference, and also consider whether the reasons for the proposed policy change has been communicated effectively for stakeholders. [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	14-May-10	1. Most of the major changes no longer appear in the draft final SMP following comments received during the public consultation period. For PDZ2G.3, this remains in the final SMP, but only as a potential change depending on monitoring and studies to confirm that this is the most sustainable way to manage this frontage. 2. Some policies changed from draft SMP. Action plan has action to communicate with local people where there's a change in policy.	1. Fuller explanations about changes from present management given for PDZs 1A, 1C, 1D, 2D, 2G, 2I, 3a and 3D. 2. See CSG response. Action plan has specific action to consult and communicate with local people in epochs 1 and 2.	The summary for PDZ 2G now discusses in some detail the thinking behind the approach, and the action to consult in the early epochs is good. Satisfied [SJ] Satisfied (JH)	Jim Hutchison Steve Jenkinson	03-Jun-10
2		09-Oct-09	Technical	Baseline Scenarios & Policy Options	section 4.4	In management unit PDZ 2I the policy option is Managed Realignment (MR) compared with the Hold the Line (HTL) in SMP1 and yet the statement given is that these are compatible.	Can the team please clarify?	Review of Draft	Jim Hutchison	14-May-10	No change in management involved. Intent is for "minimum intervention" so the dunes behave as naturally as possible, which is the same as present management.	Policy statement for PDZ2I amended, including "changes from present management" sub-section.	Satisfied	Jim Hutchison	03-Jun-10
3		09-Oct-09	Technical	Baseline Scenarios & Policy Options	Main Doc. p.3	The definition of HtL is not entirely consistent with the guidance, as it does not reflect that it is the coastal defence system that is being considered, not a single defence line.	Could the CSG please review this definition?	Review of Draft	Steve Jenkinson	14-May-10	Added 'system' to the definition and amended definition so it's the same as that in the Defra guidance.	Section 1.1, first bullet point on page 4 and first bullet in box on page 72 amended.	Satisfied	Steve Jenkinson	03-Jun-10
4		09-Oct-09	Technical	Baseline Scenarios & Policy Options	sections 4.4, 4.5	In management units PDZ 2L and PDZ 3A.2 there is an apparent need to realign in the first epoch, but it is unclear what the residual lives of these defences are.	Can the team please confirm what the residual lives of these defences are, and that these have been given due consideration in the selection of policy options?	Review of Draft	Jim Hutchison	14-May-10	Residual life 'With present management' now determined, based on condition grade and crest height.	Para added to section 2.1.5. Also added to policy statements for PDZs 1C, 2D, 2G, 2L and 3A. Added new section F 2.10 to app F.	Satisfied	Jim Hutchison	03-Jun-10
5		09-Oct-09	Technical	Baseline Scenarios & Policy Options	Plan document; section 2.1.	There appears to be no attempt to quantify or describe the influence of coastal squeeze effects (in the plan document). There needs to be some high-level statement to inform the reader whether this is a problem or not. This could also link to the Regional Habitat Creation Plan (RHCP). A good example of this is shown in PDZ 2L (p93): 'the realignment comes at the expense of current agricultural land use'. It is hard to gauge the impact of this policy from the draft document alone.	Lead authority to consider adding a high-level statement into the draft plan document (section 2,1) to show how coastal squeeze is expected to affect the intertidal extents and how this can be managed / mitigated (with a signpost to the AA?)	Review of Draft	Lee Swift	14-May-10	Coastline is currently accreting so coastal squeeze not an issue at present.	Explained in section 2.14.	Satisfied	Lee Swift	03-Jun-10
6		09-Oct-09	Technical	Boundaries	Plan doc; section 1.2 (p4)	There is no reference to Coastal Cells and how the study area fits within this national system.	Lead authority to consider placing study area into context of national Coastal Cells.	Review of Draft	Lee Swift	14-May-10	Text amended and maps added to show this SMP in context of all Anglian Region SMPs and CFMPs.	Fig 1.2 shows neighbouring SMPs. Fig 1.3 shows all Anglian Region SMPs and CFMPs and section 1.1 amended.	Satisfied	Lee Swift	03-Jun-10
7		09-Oct-09	Technical	Coastal Processes	Plan document: section 2.3	The plan makes it clear that the future evolution of the barrier islands and spits is critical to future management policies. It is not clear how/if future work will be undertaken to improve understanding of these important control features.	Lead authority to ensure that future measures to improve understanding of barrier island evolution is incorporated into the Action Plan with some reference to this in the main plan document.	Review of Draft	Lee Swift	14-May-10	Action plan deals with this (including links with the regional coastal monitoring programme). Section on current monitoring added.	Coastal monitoring sub-section added to section 2.1.5. Monitoring/studies included in action plan.	Satisfied	Lee Swift	03-Jun-10

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8		09-Oct-09	Technical	Coastal Processes	Plan doc; section 1; section 2.4	There is little reference to the sources of data/information used to summarise coastal processes. Brief mention of previous studies carried out by the EA / partners such as Futurecoast, Regional Coastal Monitoring etc. would help build confidence in following sections (and policy selection). There are many statements in the plan (particularly in section 2.4 - baseline scenarios) where the reader is asking - 'how do you know?'. Accept that further details are in the appendices but high-level description of current level of understanding is needed. [LS] What studies have been carried out as SMP1 that are being used in SMP2? [JH]	Lead authority should consider whether a separate sub-section in section 1 could better explain what evidence the SMP is based upon. [LS] Can the team please explain and indicate where such data is shown in the plan? [JH]	Review of Draft	Lee Swift Jim Hutchison	14-May-10	Added text to make more explicit how we built on SMP1 and to refer to sources of info.	Sections 1.1 and 2.3.1 expanded.	Satisfied (JH, LS)	Lee Swift Jim Hutchison	03-Jun-10
9.1		09-Oct-09	Technical	Coastal Processes	General	Estimates of flood risks underpin the risk assessments, but I am not sure where these assumptions are set out? I did not see any comments, for example, on the risk of major episodic events, locations suffering constant or intermittent problems etc.	Could the CSG please clarify where this is covered?	Review of Draft	Steve Jenkinson	14-May-10	Text and table on historic flood events incorporated into main SMP and appendix G.	Section 2.1.5 expanded to include sub-section on historic tidal flooding. Table 2.3 added.	QRG Review continues on next line in column G		
9.2		02-Jun-10				Additional text noted. I had envisaged a brief comment on how different areas are subject to different risks (eg. only major events, constant problems), citing some examples. It could perhaps include areas that are at risk but which to date have not justified protection works. If particular locations spring to mind these could be discussed briefly after the table.	Consider text addition.	Review of Resubmission	Steve Jenkinson	12-Aug-10	FIM team has confirmed two areas vulnerable to tidal surges. Text amended to include this information - agreed with FIM team. Policy statement for the Cley-Salthouse shingle ridge already highlights potential flood risk in the area behind it. Action plan contains an action to set specific triggers for work to start should a future event require this.	Flood warning and forecasting sub-section of section 2.1.5 revised to include additional information about flood risk at Wells quay and properties in Cley. Also to mention increased number of properties at flood risk up to 2105 and action in AP to deal with this.	Changes noted – this is an improvement. Satisfied.	Steve Jenkinson	27-Aug-10
10		09-Oct-09	Technical	Coastal Processes	General	The PDZ summary statements in the main document do not include much discussion on compatibility with adjacent PDZs, or indeed adjacent SMPs.	Could the CSG please clarify the extent to which this is an issue for this SMP and where this is considered.	Review of Draft	Steve Jenkinson	14-May-10	Added more emphasis in policy statements where relevant.	Section 4.2 and 4.3 expanded (new para 4 for both) and section 4.4 (new para 5)	Satisfied	Steve Jenkinson	03-Jun-10
11		09-Oct-09	Technical	Costs and Benefits	section 4.2	Summary of unit PDZ 1D states that the current policy option is to hold the line but due to no properties this plan suggests No Active Intervention (NAI).	Can the team please confirm that is was SMP1 that indicated HTL and explain if the SMP1 came to this conclusion for other assets and not the housing, i.e. has the team made sure it hasn't missed something before coming to the NAI policy option?	Review of Draft	Jim Hutchison	14-May-10	SMP1 didn't specify a policy for this individual frontage. All of PDZ1 was HTL. Change of policy reflects present management and policy statement revised to make this clear.	Amended section 4.2 and policy statement expanded for PDZ1D.	Satisfied	Jim Hutchison	03-Jun-10
12		09-Oct-09	Technical	Data and Mapping	Plan doc; section 2.1.6.	There is no mention of forthcoming guidance on Sea Level Rise (SLR) based on UKCP09 or to the fact that this will be considered in the Action Plan. [LS] There does not appear to be any reference to UKCP09. [SJ]	UKCP09 will be addressed in the National Coastal Erosion Risk Mapping (NCERM) comparison reports, but this could be signposted in main plan. Lead authority to consider doing this. [LS] Could the CSG add some explanation or reference here regarding the data incorporated in this SMP and reference to UKCP09? [SJ]	Review of Draft	Lee Swift Steve Jenkinson	14-May-10	1. UKCP09 now mentioned in section 2. 2. UKCP09 now mentioned in section 2	Amended section 2.1.6	Satisfied (LS, SJ)	Lee Swift Steve Jenkinson	03-Jun-10
13		09-Oct-09	Technical	Data and Mapping	Main Doc Sect 1.2	It is stated that Catchment Flood Management Plan (CFMP) boundaries are coincident with SMP boundaries. Were the CFMP policies considered during SMP policy development? Are they consistent? [LS] The SMP revision guidance vols 1&2 include for estuaries and tidal areas which is different from SMP1. The CSG, I assume, made the decision to limit the SMP to the CFMP downstream boundary. There would be no problem with an element of plan overlap, as long as the policy options did not conflict. [PP]	Lead authority to clarify whether CFMP policies were considered and whether it is necessary to explain this more clearly in the draft plan. [LS] Can the CSG advise whether this decision was discussed and is recorded within the SMP? [PP]	Review of Draft	Lee Swift Phil Perkins	14-May-10	1. Added text in 1.2 to clarify what policies the SMP and the CFMP provide. There is actually some overlap because the CFMP maps show the whole area, all with a P2 policy. The policies are compatible, but the relationship is limited because of the difference in scale and also in policy definition. 2. No record of this issue being discussed by CSG. Lead authority took the decision about where SMP boundary should be.	Section 1.2 expanded (new para 6). Figure 1.1 shows where CFMP boundary runs and fuller explanation now included in main document.	Satisfied (PP) Given the apparent lack of discussion around the selection of SMP boundary, a review of the boundary locations would be a useful addition to the SMP2 Action Plan. Satisfied subject to this being added to the AP. (LS) CSG - the inland boundary has now been actioned (31 May 11)	Lee Swift Phil Perkins	27-Aug-10

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14	Showstopper	09-Oct-09	Technical	Data and Mapping	Main Document, Section 4	The opening text of 4.1 indicates that mapping is included with the policy statements, but we could not find policy maps. In order to make the SMP more easily accessible to those that need to use it in future, we suggest that it would help to see maps of the PDZ showing the policies and the associated flood and erosion risk areas in the main document. [AP] Maps to illustrate draft policy options are mentioned in section 4.1 but they do not follow. The use of maps in this section to illustrate draft policy options over the three epochs (for each PDZ) would help the reader understand the accompanying text and place this into geographical context. They could also be used show flood and coastal erosion risks. [LS] There do not appear to be any policy maps with the policy statements as suggested by the introduction 4.1. I assume these are the maps in the non-technical summary. It would have been helpful to reference these. [SJ]	Please add maps to the main document showing the SMP policies and the associated erosion and coastal flood risks. [AP] Lead authority to advise why maps were not included in the main document as stated to help explain the draft policies in this consultation draft. [LS] Could the CSG confirm that the maps referred to are those in the NTS, and that they will be included in the main document as stated? [SJ]	Review of Draft	Andy Parsons Lee Swift Steve Jenkinson	14-May-10	1. Maps added for all PDZs. Flood risk only - no erosion along this coast. 2. These were inadvertently omitted from the draft SMP when it was published. 3. Draft SMP should have included the maps that were in the NTS.	Maps added to chapter 4 to show policies for each PDZ and blow-ups for potential realignment sites.	Satisfied (AP, LS, SJ)	Andy Parsons Lee Swift Steve Jenkinson	03-Jun-10
15		09-Oct-09	Technical	Decision Making	section 2.4.2	This sections states that advance the line is not a "realistic" policy option for the "whole frontage". It is unclear if there may be small parts of the coast where this policy option might be a useful way forward, or if there is absolutely nowhere that it would work? [JH] This section draws attention to the big issues regarding coastal management which is useful. However, in doing so the wording may be interpreted as suggesting that the approach has to be the same along the whole coast e.g.. advance the line not a realistic policy option for the whole area. [SJ]	Can the team please explain? [JH] Could the CSG amend the text to address this? [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	14-May-10	1. Many defences unlikely to be sustainable where they are now so ATL not appropriate anywhere in the SMP area. This is the reason for the current realignment at Titchwell reserve. 2. Text amended.	Amended section 2.4.2	Satisfied (JH, SJ)	Jim Hutchison Steve Jenkinson	03-Jun-10
16		09-Oct-09	Technical	Decision Making	Appendix E and G	I am concerned about the clarity of approach to scoring policies and mechanism for averaging to help derive the preferred policy option. This is a methodology that has been grappled with but concluded that it is not possible to weight objectives to compare like for like, or for example in the case on an SMP, the importance of environmental habitat with major infrastructure. It is not clear if this has been done here?	Please explain if and how weighting between objectives has been considered in the SMP.	Review of Draft	Andy Parsons	14-May-10	Objectives considered individually and not weighted against each other.	Para 6 of sub-section 2.4.2 expanded to explain this better.	Satisfied	Andy Parsons	03-Jun-10
17		09-Oct-09	Technical	Decision Making	Main Document, Page 46, First Line	There are other 'potential negative effects'. This is open ended and could raise concern.	Please explain what these could be or end with examples to give the reader an idea of the extent of these potential effects.	Review of Draft	Andy Parsons	14-May-10	Text slightly amended due to changes in policies from draft SMP. Policy statements give more information about potential positive and negative effects of policies.	Section 3.1 amended. Policy statements expand on potential positive and negative benefits of final policies.	Satisfied	Andy Parsons	03-Jun-10
18.1	Showstopper	09-Oct-09	Technical	Linkages	SMP overview document page 4. Appropriate Assessment, para 3.2; Sect 5	The section between Sheringham and Kelling Hard appears to me to be part of the westward drift of shingle towards Cley. Looking at over-view maps it would seem that the drift divide is more likely to be located at Weybourne than at Kelling Hard and it would seem likely that this is the more critical point for controlling sediment movement westwards. This being so, it is important to think about how integration of this area will be achieved. I would be concerned if there were inconsistent policy options or practices between adjacent SMPs that led to the creation of hard points that interrupted sediment supply towards Blakeney.	Can the team please confirm the location of the drift divide, the reasons why its there and consider how to make sure that the linkage between Sheringham and Kelling Hard will be addressed, and to emphasise the relationship to natural change? Is there any future risk of this location changing, and if so, what are the likely impacts?	Review of Draft	Roger Morris	14-May-10	Based on input from Peter Frew, expanded text to mention potential drift divide near Kelling. Added text to discuss impact of policy on neighbouring SMP. Peter Frew has also confirmed that the neighbouring SMP has no longshore impact on this SMP.	Amended section 2.1.4 para 4 and 4.4 (para 5 added).	QRG Review continues on next line in column G		
18.2		02-Jul-10				A statement specifically detailing how the linkage between Sheringham and Kelling Hard will be addressed would be beneficial. The material added in response to the original comments should be complemented with a comment emphasizing the relationship to natural change. The likelihood of the linkage site changing has been flagged although potential impacts have not been outlined - some more detail here, even if it's an acknowledgement that the impacts are unknown, would be beneficial.	Please add further discussion as indicated.		Joe Green pp Roger Morris	12-Aug-10	Sentence added about not knowing what the effects of the changing drift divide are. Also, the policy for the neighbouring frontage (Weybourne cliffs) in SMP6 is NAI. This is consistent with the policy of limited intervention for the Cley to Salthouse frontage.	Section 2.1.4 revised.	QRG Review continues on next line in column G		
18.3		27-Aug-10				Further comment needed on how the linkage between Sheringham and Kelling Hard is to be addressed is still required. Other than that, satisfied with other amendments.	Please provide a comment on where further action is identified.		Joe Green	13-Sep-10	The action plan contains an action to look at the boundaries of the SMP, as the boundaries of the coastal water bodies differ from the boundaries of this and the neighbouring SMPs. This action should help to define more clearly where the drift divide occurs and how this is linked to natural change along this coastline.	Section 5 (action plan for PDZ3) contains relevant action.	Satisfied	Joe Green	17-Sep-10
19	Showstopper	09-Oct-09	Technical	Linkages	General; Chapter 2	This chapter sets out the links with other high level planning documents, CFMPs and CHaMPs, etc.but it is not clear if the outcomes from the SMP2 are consistent with these other plans? [JH] In general, the links between SMP and wider policy framework are not explained in the draft plan. Aside from the study area maps there is little mention of CFMPs and no reference to the Regional Habitat Creation Plans, emerging planning policy, NCERM, UKCP09 etc. [LS]	Can the team please explain and clarify? [JH] Lead authority to explain why greater links have not been made to wider policy framework which might improve confidence in / justification of draft policies. [LS]	Review of Draft	Jim Hutchison Lee Swift	14-May-10	1. CFMP policies taken account of. This is now explained in more detail. 2. More information included about links with RHCP, LDFs and UKCP09.	1. Para 6 added to section 1.2. 2. Para 5 added to section 2.1.8. Para 5 of section 3.2 expanded. Para 4 added to "wildlife and geology" sub-section of section 3.2. New "water quality" sub-section added.	Satisfied	Jim Hutchison Lee Swift	03-Jun-10
20		09-Oct-09	Technical	Risks and Impacts	section 2.2.2	There are statements that future land use will not be an issue in this part of the coast.	Two things: 1. What is it about the Regional Spatial Strategy/Local Development Framework that gives this confidence? 2. It would be good if the plan set out what the key issues really are for this plan in a succinct section.	Review of Draft	Jim Hutchison	14-May-10	LA planners have been involved throughout and have confirmed the SMP's statement that there will be no inappropriate development in the flood zone.	Section 2.4.1 lists key issues for this SMP - slightly amended from draft. Section 3.2, para 3 of "property and infrastructure" sub-section expanded. List of CSG and EMF members in appendix B now includes their roles.	Satisfied	Jim Hutchison	03-Jun-10

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21		09-Oct-09	Technical	Risks and Impacts	Main Doc. p107	PDZ 3C Blakeney has HtL through all 3 epochs and shows a negative effect on defences in epochs 2 & 3. However there is no discussion about this in the text.	Could the CSG comment on this please.	Review of Draft	Steve Jenkinson	14-May-10	Red means we're not reducing reliance on defences. Text now added to all relevant policy statements about not reducing reliance on defences to make this clear.	Amended section 4.1 and App G. Para 2 of section 4.2 expanded.	Satisfied	Steve Jenkinson	03-Jun-10
22		09-Oct-09	Technical	Sensitivity	Thornham	There are statements about defences no longer being required - if left without management, will the coastal processes be adversely affected? And will the landowner feel obliged to continue to maintain the bank?	Can the team be clearer on the impacts of such a proposal at Thornham?	Review of Draft	Jim Hutchison	14-May-10	Added text to explain there are no significant longshore impacts. Re. landowner intervention: the defended area is relatively high, sloping up and small, and in use as grassland, so we don't expect the landowner will want to intervene. Added text in all policy statements with significant (potential) changes with ref to action plan that any changes require stakeholder engagement.	Amended policy statement for PDZ1D.	Satisfied	Jim Hutchison	03-Jun-10
23	Showstopper	09-Oct-09	Technical	Sustainability	section 3.1	Use of term "sustain" - is this deliberate as it is an improvement option and not a maintain option [Para 4.2 has the same issue] Clarity in the difference between the terms sustain and maintain in the plan is required as they appear to be used and interchanged in places. Another example is PDZ 2H where the options are to "maintain".	Can the team please clarify the terms used? There appears to be confusion and use of these two terms for a number of situations?	Review of Draft	Jim Hutchison	14-May-10	Carried out general review of the use of the word sustain, particularly when used for defence management. Often used also for land use, which seems appropriate.	Amended app E, section 3.4.2, 4.4.1 to 4.4.2, app G section G2, app H section H3 and table 1, policy statements for all PDZs except PDZ1D, 2A, 2C, 2M and 3B.	Satisfied	Jim Hutchison	03-Jun-10
24		09-Oct-09	Technical	Sustainability	section 2.3 main report	Impacts on highways could be real and may need to consider realigning the road.	What is the overall outcome for the Highways Agency in the plan and what is their status and commitment on the findings?	Review of Draft	Jim Hutchison	14-May-10	Highways Agency doesn't maintain the A149. Local highways authorities should be aware as both LAs are represented on the CSG/EMF.	Norfolk County Council sits on CSG and EMF. Planning & Transportation team is a key stakeholder - see appendix B. Action plan includes action to communicate with NCC re possible effect of SMP policies on A149.	Satisfied	Jim Hutchison	03-Jun-10
25		09-Oct-09	Technical	Thematic Reviews	chapter 2	The descriptions for the super frontages cover a large frontage so when statements are given about the risks to properties, the locations are not entirely clear.	Can the team please explain where such details can be found in the reports?	Review of Draft	Jim Hutchison	14-May-10	Table now lists number of properties at risk now, including historic assets. Risk to properties discussed in 2.3 - description of no active intervention scenario. Figure 3.1 shows tidal flood zone and properties at risk.	Table 2.1 added to section 2.1.5 and more info in appendix F, section 4.3.5 and table 4.3 added.	Satisfied	Jim Hutchison	03-Jun-10
26.1		09-Oct-09	Technical	Tools	General	Does the SMP comment on any flood warning and contingency planning issues, including how they relate to the recommended policy options at specific locations, and will it include any relevant actions in the Action Plan?	Could the CSG please comment on this?	Review of Draft	Steve Jenkinson	14-May-10	Info added about flood warning areas and emergency planning	New FW and EP paras added to section 2.1.5. Also added actions into action plan.	QRG Review continues on next line in column G		
26.2		02-Jun-10				The new FW text looks a bit like an information note straight off the EA website. Aside from listing the N Norfolk FW areas there is limited link with the SMP itself. I suggest trimming some of the text on this (too much detail in my view) but adding a comment on how the SMP, or more probably subsequent strategies, might consider the benefits of FW in their assessment of options, and noting that actions are included in the AP to follow this up. The EP text is better. Again I suggest that you add a last comment on how the SMP will address EP ie. through the AP.	Suggest text is amended.	Review of Resubmission	Steve Jenkinson	12-Aug-10	Text amended to remove most of the generic information about flood warning and forecasting. Also added in more information about increased risk in this area and actions in action plan. Historic flooding sub-section moved so it appears before flood warning and forecasting sub-section. Agreed changes with FIM team.	Flood warning and forecasting sub-section of section 2.1.5 revised.	Changes noted. Table 2.2 may be more detail than appropriate here but not an issue. Satisfied.	Steve Jenkinson	27-Aug-10
27		09-Oct-09	Social	Affordability	Sect 3.2 p.49	The discussion on communities notes that the plan provides continued defence for all settlements, also that it provides continued protection for some of the tourist features. In my view these are open-ended commitments.	The CSG should consider amending the text to emphasise that the plan establishes policy options based upon current knowledge, but that all activities are subject to funding being secured. This may already be noted elsewhere but in my view this should be re-iterated.	Review of Draft	Steve Jenkinson	14-May-10	Text amended to reduce expectation of funding being available to protect all properties and infrastructure in the future.	Amended section 1.1 para 6, section 3.1 para 1 and 4.4 para 1. Also policy statements for PDZ1C, 2G, 2L and 3A.	Satisfied	Steve Jenkinson	03-Jun-10
28	Showstopper	09-Oct-09	Social	Affordability	section 3.1	This paragraph states firmly that all houses will be defended during the plan period, yet the economics in some areas is not certain and there are numerous statements of uncertainty on coastal processes in epochs 2 and 3. [JH] Sect 3.1 comments that the extent of realignments will ensure that all houses will remain protected. This is a slightly ambiguous but certainly significant commitment which I am surprised the CSG feels able to make. [SJ]	Can the team please explain the statements on protection all properties? [JH] I suggest the CSG reconsiders this statement, which is made twice in quick succession. [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	14-May-10	All statements about 'continuing to defend' now state that this is the intent (not that it 'will happen'). In addition, text added to section 1.1 to make more explicit that SMP policies don't guarantee funding. Finally, changed wording of economic viability conclusions and added text to highlight need for and potential sources of funding.	All policy statements now have caveat that policy will only be implemented if technically possible and economically viable.	Satisfied (JH, SJ)	Jim Hutchison Steve Jenkinson	03-Jun-10
29		09-Oct-09	Social	Affordability	sections 2.4.1 and 3.2	It is not clear whether there is scope for relocating assets to higher ground, or more sustainable locations, rather than making improvements to the defences? In section 3.2 there are suggestions of improvements to accommodate "all properties", and affordability of this is unclear. [JH] Sect 3.2 p.47 states that the plan provides continued flood defence to all houses etc. Firstly, I think the wording should be amended with some caveats about available funding, uncertainties of climate change etc. Secondly, it comes across as if it has succeeded in that as an objective, and raises the question as to whether other wider options, such as adaptation approaches, have been given due consideration. [SJ]	Can the team please clarify and if the CSG agrees, then explain where these properties might be? [Please note that the first mention of sustainability is Chapter 4 of the main report. Also little discussion of use of the emerging coastal change fund and whether such use would actually be more sustainable?] [JH] Could the CSG consider re-wording? Also to confirm that all options have been given adequate consideration. [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	14-May-10	1. There seems to be little scope for re-locating scattered properties and assets at risk. 2. Text amended as detailed above.	1. Amended text in section 1.1 (para 6), section 3.1 (para 1), section 3.2 (para 3), section 4.2 (para 1), PDZ2G, PDZ2L, PDZ3a and appendix E. 2. Action plan includes actions for adaptation and consultation/communication with local communities and landowners.	Satisfied	Jim Hutchison Steve Jenkinson	03-Jun-10

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30		09-Oct-09	Social	Data and Mapping	section 2.3 main report	How many properties are likely to be lost due to erosion or flooding as a result of the 2 baseline management options? Also, which locations are the properties.	Please show and explain where this property loss is likely to occur (which maps refer?).	Review of Draft	Jim Hutchison	14-May-10	Added table listing number of properties at risk, including historic assets. Risk to properties is discussed in 2.3 - description of no active intervention scenario. Figure 3.1 shows tidal flood zone and properties at risk. Given that the issue is flood risk only, there is not much sense in distinguishing WPM and NAI, because the same number is at risk (it's just that they are defended in WPM).	Table 2.1 added to section 2.1.5 and more info in appendix F, section 4.3.5 and table 4.3 added.	Satisfied	Jim Hutchison	03-Jun-10
31.1		09-Oct-09	Social	Engagement	App. B Consultation Register	Two comments on this table. Firstly, is it the case that to date there have only been 18 comments made on the SMP prior to the consultation draft? Secondly, will the table be extended to explain what the actions actually were in response – I am thinking mainly of those notes as "passed to Royal Haskoning". As you will be aware an important part of the audit trail is recording how comments are dealt with and what changes, if any, are made to the plan as a result.	Could the CSG please comment on this?	Review of Draft	Steve Jenkinson	14-May-10	All comments received pre-consultation now added to consultation register. This will be updated when full replies sent to all those who commented (due end May/early June).	Consultation register now shows all comments received before, during and since the consultation period (appendix B)	QRG Review continues on next line in column G		
31.2		02-Jun-10				The table looks very comprehensive.	Could the team please clarify if the latter comments in the table, those received during consultation, will have a response with regard to the SMP recorded in the Actions column eg. "text amended"; "not relevant"; "policy option change" or whatever?		Steve Jenkinson	12-Aug-10	The final column of the consultation register has been updated to show how the policies, text etc have changed in response to the comments. Letters have been sent to everyone who commented, with information sheets for the frontages we received the most comments about. The final column of the consultation register now states the date the letters were sent out and any additional information they contained that wasn't in the standard letters.	Appendix B revised and updated to show latest information about how final SMP has changed in response to comments received and date letters sent out to tell consultees this.	This now looks much more comprehensive. Satisfied.	Steve Jenkinson	27-Aug-10
32		09-Oct-09	Social	Engagement	General	The engagement process is very thorough although it is likely that stakeholder attendance was patchy as in other SMP areas. I was surprised that there was no reference to leaflets being distributed/placed within the coastal communities.	Could the CSG comment on this please?	Review of Draft	Phil Perkins	14-May-10	Information added about publicity etc before and during consultation period	Appendix B amended. Comms plan details actions taken to publicise draft SMP (not public document). Consultation report (published) also includes this information.	Satisfied	Phil Perkins	03-Jun-10
33		09-Oct-09	Social	Engagement	pp 41,42 – Sect 2.4	The 'difficult' decisions made in the plan will require a period of adapting. Where there are changes to the SMP policy options from SMP1 especially in the first two epochs it is important to ensure that maximum stakeholder engagement is achieved. It is difficult to ensure that full landowner engagement unless individual owners are sought and tracked down, but where there are policy option changes this would be prudent.	Can the CSG confirm if there is a strategy for all landowners to be informed where there is a change of policy from SMP1 in these epochs ? Are there any individual / group meetings required to convey these policy option changes ?	Review of Draft	Phil Perkins	14-May-10	Process already started. Area coastal team leads on this.	Action plan includes actions to do this.	Satisfied	Phil Perkins	03-Jun-10
34		09-Oct-09	Social	Risks and Impacts	Main Doc. pp53, 54	I was trying to work out what the adaptation of communities principle actually meant in the context of the green amber red system. As far as I can see the clock is green for all frontages, all epochs.	Could the CSG please explain what this principle actually represents, and whether this would be better covered in a different way such as commentary in the text?	Review of Draft	Steve Jenkinson	14-May-10	The icon refers to principle 4 and the key indicator there is the time available for adaptation. We've reworded the text at the icons to 'Providing time for adaptation…'.	Narrative for this principle re-worded.	Satisfied	Steve Jenkinson	03-Jun-10
35		09-Oct-09	Environmental	Data and Mapping	General	Have English Heritage undertaken any coastal assessments in this area, and if so have they been used in the development of the plan?	Could the CSG please comment on this?	Review of Draft	Steve Jenkinson	14-May-10	Upgraded and used early generation RCZAS as part of this project. Now working with EH and NLA to incorporate additional data in final SMP.	Historic environment information updated throughout plan and appendices. Includes amending section 1.1, para 4. This is also one of the SEA assessment criteria.	Satisfied	Steve Jenkinson	03-Jun-10
36		09-Oct-09	Environmental	SEA/AA	Appropriate Assessment	The conservation targets do not properly reflect the draft Conservation Objectives. I think the proper objectives should be quoted. Also, it is my understanding that the Conservation Objectives are not under revision to make them more numerically orientated. The Objectives have simply not been elevated from draft to formal adoption stage.	Please comment and if appropriate, revise.	Review of Draft	Roger Morris	14-May-10	Text revised	Amendments agreed with NEAS and NE	Satisfied	Joe Green pp Roger Morris	03-Jun-10

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37	Showstopper	09-Oct-09	Environmental	SEA/AA	Appropriate Assessment	The views of Natural England on this Appropriate Assessment (AA) is unclear, i.e. is there significant impact as a result of the proposed policy options or not?	Can the team please clarify?	Review of Draft	Jim Hutchison	14-May-10	AA has been developed in full collaboration with Natural England. NE has fully signed up to conclusions of AA.	Consultation report in appendix B now shows comments received from NE during SMP process, including finalising SEA and AA.	Satisfied. Note: this plan will not be complete without the SoS agreement to the HRA. Note: Agreement to the HRA was obtained on 1 July 2011.	Jim Hutchison	03-Jun-10
38		09-Oct-09	Environmental	SEA/AA	Appropriate Assessment, para 3.2.	Conservation Objectives are not Natural England's "interpretation" of conditions needed to maintain favourable condition. They form statutory advice to operators and to competent authorities and are used as the baseline against which to evaluate possible damaging operations.	Please revisit text, and clarify what changes have been made.	Review of Draft	Roger Morris	14-May-10	Text revised	Amendments agreed with NEAS and NE	Satisfied	Joe Green pp Roger Morris	03-Jun-10
39		09-Oct-09	Environmental	SEA/AA	Sect. 3.2 p.46	Notes that the Strategic Environmental Assessment (SEA) intends to ensure environmental and socio-economic issues are central to policy development. Surely the SMP does this anyway?	Suggest this is re-worded – perhaps noting that the SEA draws out these issues from the plan? This could then lead in to the following sentence.	Review of Draft	Steve Jenkinson	14-May-10	Text revised to reflect comment.	Amended section 3.2	Satisfied	Steve Jenkinson	03-Jun-10
40		09-Oct-09	Environmental	SEA/AA	Appendix 1 of Appendix L	The thresholds that are used to determine the significance of an impact are not clear. As a result the justification for some of the conclusions on the significance of the impact does not appear to be robust. For example, what is the basis for judging the increase in Biodiversity Action Plan (BAP) habitat (p 67) to be a major positive, as opposed to a minor positive impact? Why is the predicted net increase in BAP for assessment unit F3a only considered to be neutral (p 76)? The impact on European sites in F3a is stated, at best, to be only partially offset by habitat evolving elsewhere, so why is the impact assessed to be neutral as opposed to negative?	Please review the assessment of significance of impacts and clarify how the significance of impacts has been determined. Any changes should be incorporated into the proposed SEA addendum.	Review of Draft	Karl Fuller	14-May-10	Issue addressed in the SEA addendum developed in discussion with NEAS.	Section 1.4 of SEA addendum and table 1.1	The addendum provides additional detail on the approach used to assess impacts. The explanation remains somewhat obscure and only becomes a little clearer when examples are provided. The approach is difficult to understand and appears prone to result in some curious conclusions (an adverse effect on the integrity of North Norfolk Coast and Wash SPAs is assessed as a *minor* negative effect). At least the approach is now a little more transparent. Satisfied.	Karl Fuller	03-Jun-10
41.1	Showstopper	09-Oct-09	Environmental	SEA/AA	Appendix 1 of Appendix L	The assessment of changes in BAP habitat are a concern. Consideration only appears to have been given to the net change in total area with no consideration given to the types of habitat lost compared to those being gained with particular reference to their rarity and the extent to which they can be recreated. There appears to be an inconsistency between Appendix K and L. Appendix K indicates the potential for the SMP to contribute to failure of environmental objectives and highlights 3 water bodies. However, these potential effects are not reflected in the assessment in Appendix 1 of the SEA report.	Please consider the impact on BAP habitat in the light of the type of habitat affected and incorporate any changes into the proposed SEA addendum. Please clarify the effects on meeting Water Framework Directive (WFD) objectives, ensuring consistency with Appendix K.	Review of Draft	Karl Fuller	14-May-10	1. Issue addressed in the SEA addendum developed in discussion with NEAS. 2. Issue addressed in the SEA addendum developed in discussion with NEAS.	1. Appendix 1A of SEA addendum. 2. Appendix 1A of SEA addendum.	QRG Review continues on next line in column G		
41.2	Showstopper	03-Jun-10	Environmental	SEA/AA	Appendix 1 of Appendix L	1. The addendum reiterates that only total area of BAP is assessed. I remain concerned that there is no wider recognition of the cumulative effect of losses of freshwater habitat (not assessed as negative as it is replaced by intertidal). Perhaps this issue could be addressed in the Statement of Particulars? 2. It is still difficult to see how the assessment is consistent with Appendix K. F1 concludes a neutral effect, but appendix K, but the area includes 3 PDZs that conflict with objective 2 and 4 that conflict with objective 4. The assessment of F2b recognises the conflict with objective 4, but still assesses the impact as neutral and ignores the conflict with objective 2 in PDZ 2l. Assessment unit F3a also appears inconsistent with the WFD assessment.	1 Please clarify whether the overall loss of freshwater BAP habitat has been considered. 2 Please explain how or whether the apparent inconsistencies between the assessment & Appendix K can be reconciled. If necessary, the resolution to these issues should be picked up in the Statement of Particulars.		Karl Fuller	12-Aug-10	1. The assessment criterion agreed with NEAS is "Will the SMP policy result in a net change in priority BAP habitat extent?" The SEA ER therefore provides a commentary on the net change in UKBAP priority habitats. The criterion doesn't take account of changes in UKBAP composition or provide an assessment about loss of freshwater BAP habitat. Any losses of freshwater UKBAP habitat are generally offset by gains in intertidal which has led to neutral scoring for most PDZs (total area of BAP habitat doesn't change). 2. Haskoning to provide advice about this comment. NEAS to agree how to respond to this comment in the statement of environmental particulars.	1. Statement of environmental particulars will update the SEA where there have been changes in policy since the draft SMP was published. 2. WFD assessment updated since draft SMP published, but SEA is revised by statement of environmental particulars. NEAS to advise how to reconcile differences between levels at which each are assessed or state that these exist.	QRG Review continues on next line in column G		

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41.3		27-Aug-10				1 Assessment criteria provide an indicator of change this doesn't provide a reason to ignore other environmental changes that are not captured by the criteria. 2 This comment remains unanswered.	1 Please confirm that the Statement of Particulars will address the changes in composition of BAP habitat. 2 Please respond.		Karl Fuller	13-Sep-10	NEAS to confirm that SoEP will address changes in composition of BAP habitat.	1. We confirm that the SoEP will address the changes in composition of BAP habitat. 2. WFD assessment updated since draft SMP published, but SEA is revised by statement of environmental particulars. SoEP will update the SEA so it is consistent with appendix K.	Satisfied subject to SoEP addressing changes. CSG response - This has been in the SoEP. (30 June 11)	Karl Fuller	17-Sep-10
42.1	Showstopper	09-Oct-09	Environmental	SEA/AA	Appendix L, 5.4.3 Appendix 1 of Appendix L	The SEA is silent on the impact of the Plan on European Sites. The impacts are recorded as uncertain and the report states that this issue is the subject of ongoing dialogue with Natural England. There are several implications to this approach: a) The potential impacts on European Sites do not appear in the wider consideration of the significant impacts of the plan. As a result, given the approach to the assessment of alternatives, the opportunity for these impacts to drive a deeper consideration of alternative approaches is lost. b) The SEA is potentially subject to challenge given that it has not assessed the potentially significant effects of the plan. It is not sufficient to defer this to the appropriate assessment as this is not subject to the same regulatory requirements as the SEA. The Appropriate Assessment should inform the SEA. c) The significant adverse effects of the plan are potentially under represented.	Please provide an addendum to the SEA that includes an assessment of the impact on European Sites. Where there is uncertainty a reasonable worst case impact should be assumed. The summary of the assessment in the main report should be revised to take into account the reassessment of the environmental effects. This could include the consideration of alternatives, mitigation and monitoring measures as well a the overall summary of the impact of the Plan.	Review of Draft	Karl Fuller	14-May-10	1. Issue addressed in the SEA addendum developed in discussion with NEAS. 2. Issue addressed in the SEA addendum developed in discussion with NEAS.	1. Appendix 1A of SEA addendum. 2. Appendix 1A of SEA addendum.	QRG Review continues on next line in column G		
42.2		03-Jun-10				The assessment of the effects on N2K sites has now been included. However, the overview of the negative effects across the assessment unit and the whole of the SMP area has not been revised. Would the inclusion of the effect on N2K sites result in additional assessment units undergoing a more systematic approach to the consideration of alternatives?	Please provide a revised picture of the overall effects of the plan in the Statement of Particulars.		Karl Fuller	12-Aug-10	Will appear in the statement of environmental particulars.	Will appear in the statement of environmental particulars.	Satisfied	Karl Fuller	27-Aug-10
43.1	Showstopper	09-Oct-09	Environmental	SEA/AA	Appendix L	The SEA report does not include a description of the relationship of the plan to other plans and programmes. This is one of the required elements of an Environmental Report as well as being important to understanding how the plan is likely to 'fit' with other plans and policies relevant to the location.	Please clarify whether an analysis of the relationship to other plans and policies was undertaken and indicate where this has been reported.	Review of Draft	Karl Fuller	14-May-10	Issue addressed in the SEA addendum developed in discussion with NEAS.	Section 1.4.1 of SEA addendum.	QRG Review continues on next line in column G		
43.2		03-Jun-10				Not satisfied. This has not been addressed in the addendum. The section of the report referred to addresses how the assessment method is applied to threats to biodiversity. Neither is the issue addressed elsewhere in the report.	Has a review of plans and policies been undertaken for the SEA? Are we able to demonstrate that this doesn't change anything with the plan?		Karl Fuller	12-Aug-10	NEAS agreed way forward with Karl. RH to do assessment of policies, plans and programmes and produce separate report.	Will appear as a separate report on the EA website when final SMP published.	Please publish the PPP review as soon as possible and do not wait for final SMP. Subject to this being undertaken I am satisfied. CSG response - The East Anglian Coastal Group are launching a new website which will host all of the SMP documents including the PPP. This should be ready for the later part of this year. (31 May 11)	Karl Fuller	27-Aug-10
44.1		09-Oct-09	Economic	Affordability	Main Doc Section 4	Is the private owner [in unit PDZ 2B] intending to maintain or sustain in line with sea level rise? Can this HTL policy option be made clearer that there is no intention to use public funds now or in the future? [JH] The draft policy option for PDZs 2B & 2Eis for HtL subject to private funding. Is there reasonable evidence to suggest that private funding is available and will be committed on time? If not, what are the impacts of withdrawal from maintenance in terms of coastal change and/or requirement for government funding to manage the change? [LS] PDZ 2B and PDZ 2Eboth have HtL policies through all 3 epochs which are dependent upon private sector activities and funding. However there is no discussion on confidence levels that the defences will be maintained over time, nor on the implications of the private sector withdrawing for some reason. [SJ]	Can the team please clarify? And what does the statement "no substantial change" from the existing policy option mean? [JH] Lead authority to consider the level of confidence that private funding is available and the implications if funding is not forthcoming (signpost to NAI / baseline scenarios)? [LS] Could the team please provide further information on this, or point to the relevant part of the SMP if covered elsewhere. I would expect some discussion on opportunities and risks. [SJ]	Review of Draft	Jim Hutchison Lee Swift Steve Jenkinson	14-May-10	Confirmed intent of private owners at Titchwell and in PDZ2E. RSPB and RWNGC intend to keep maintaining the defences. Added text to illustrate impacts of NAI. Intentions of other private owners at Brancaster and Brancaster Staithe not yet understood so action plan includes an action to find this out.	Policy statements for PDZ2B, 2E and 2F amended. Action plan includes actions associated with this.	QRG Review continues on next line in column G		
44.2		02-Jun-10				Text changes noted – these are a definite step in the right direction. [SJ] Satisfied (LS, JH)	The new statement for 2E regarding the risk of the golf club stopping maintenance in the future invites a further question – how would this be dealt with, what's plan B? Are you able to add a comment for example confirming that through monitoring/liaison activities included in Action Plan there would be time to consider further options prior to significant changes taking place? (SJ)		Steve Jenkinson	12-Aug-10	Unlikely that the golf club won't continue to maintain their defences. Should the club decide not to continue maintaining, current coastal monitoring programme would highlight any problems caused. Action plan will be updated with relevant actions should these become necessary in the future.	Although considered unlikely, the SMP-wide coastal monitoring in the action plan should highlight any problems caused by the golf club not maintaining its defences in the future. Remedial actions would then be incorporated into the action plan if necessary.	Satisfied (JH, LS, SJ)	Jim Hutchison Lee Swift Steve Jenkinson	27-Aug-10

The North Norfolk SMP Review - Finalised QRG spreadsheet

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45.1	Showstopper	09-Oct-09	Economic	Affordability	PDZ 1C and PDZ 3C	There is some inconsistency in the economic outputs on some of the assessments, for example the first of these units has a benefit Cost Ratio (BCR) of 2.4 as "clearly" economically worthwhile and the 2nd BCR at 2.0 being "marginally" economically worthwhile! On PDZ2F AND 2G, the BCR is very low, around 1.2 and it will take a lot of other damages to make a difference and indeed may not meet the criteria for future public funding - what is the plan suggesting in such cases? [In unit PDZ 2H this unit has a BCR <1 and HtL is still stated as the preferred policy option?] [JH] In my view we need to be careful about the messages being given in Table 1 in relation to the BCRs. Whilst a BCR of over one to one could be considered to demonstrate economic viability, it is likely that public funding for management activities will only be forthcoming for much higher BCRs. The use of "clearly economically viable" may therefore be raising expectations about the affordability of delivering the proposed policy options. Further, the phrase is used for PDZ 2H which has a BCR less than 1:1 [SJ]	Can the team please set out the criteria on this please? I would suggest a BCR well in excess of both these figures would be required before the word "clearly" could be used? Can this be clarified throughout the reports please? Can the team also please explain the plan for the way forward if public funding is not obtained as suggested, e.g. will this amend the proposed policy option? [JH] Could the CSG review the commentary in Table 1 and ensure the messages are consistent and measured. [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	14-May-10	1. Criteria agreed with EA coastal team for stating viability of certain BCRs. 2. Text now amended following discussion with EA coastal team. 3. Non-availability of funding is unknown at this stage, so should not affect final policy. Caveats added about this possibility should it arise in future. 4. Commentary reviewed.	1. Text amended in section 1.1 and appendix H, section H2.3 and table 1.	QRG Review continues on next line in column G		
45.2		02-Jun-10				Text changes noted. Text at Sect. 1.1 is okay, but isn't there an opportunity to add a line clarifying the difference between viability and likelihood of funding at Sect. H2.3? [SJ] Not satisfied as team has not clarified how large a BCR would achieve "clearly worthwhile" in their view and whether they consider such a BCR is affordable? [JH]	Could the Team consider adding further text to App. H? [SJ]		Jim Hutchison Steve Jenkinson	12-Aug-10	1. Section H2.3 revised to state that the economic viability of a policy does not mean that it will be affordable from the FCRM budget. 2. Section H2.3 sets out which BCRs are considered not viable, marginally viable and clearly viable. This was clarified with MJ, SH and GW. HtL up to the middle of epoch 3 means maintaining existing defences unless there's a specific event that causes damage etc. Capital spend in epoch 1 should be confined to finding and building replacement habitat for Blakeney Freshes. In epoch 2, capital spend will be to realign at Blakeney Freshes, possibly realign at Brancaster west marsh (no inland defence needed, but will need compensatory habitat) and some work at Old Hunstanton dunes. Other than this, there should be little capital spend until epoch 3 (around 2075) and we cannot say now whether this would be affordable.	1. Section H2.3 revised. 2. No action	Additional text is blunt but gets the message across. Satisfied. [SJ] Satisfied (JH)	Jim Hutchison Steve Jenkinson	27-Aug-10
46		09-Oct-09	Economic	Affordability	Main Doc. Sect 4 p93	The discussion notes that the preferred realignment policy option is dependent upon third party funding, but there is no comment on who may wish to fund this policy, what the benefits to them might be etc.	Could the CSG comment on this and should consider adding something on this to the Policy Statement discussion.	Review of Draft	Steve Jenkinson	14-May-10	Policy amended so no longer relevant	Action plan contains action to consult and communicate with local residents and landowners about possible future realignment here.	Satisfied	Steve Jenkinson	03-Jun-10
47.1		09-Oct-09	Economic	Costs and Benefits	Sect. 4.1 p.54	Notes that the economic viability of the draft policy option is reported at the level of superfrontages.	Could the CSG clarify the need to use "superfrontages", and particularly what a superfrontage draft policy option is. Also why is it valid to report on economics at the superfrontage level?	Review of Draft	Steve Jenkinson	14-May-10	This term was introduced with full agreement of CSG and EMF and has not received any negative local feedback. Other SMPs call them Management Units or something similar. The decision to report economic viability at SF level was also taken in close agreement with CSG to reflect the approach that economics should not be the key driver.	CSG/EMF agreed to keep economics at this level with more detail in appendix H, table 1 for each individual PDZ.	QRG Review continues on next line in column G		
47.2		02-Jun-10				Noted.	It would be helpful to simply add your comment re why assessed at SF level (economics not key driver) to the text at (current) page 77.	Review of Resubmissi	Steve Jenkinson	12-Aug-10	Text added to state this.	Text added to page 75	Satisfied	Steve Jenkinson	27-Aug-10
48.1		09-Oct-09	Economic	Costs and Benefits	App. H Table 1	Is it really the case that there will be no damage costs associated with any of the preferred policy options, or am I mis-interpreting the table?	Could the CSG please clarify?	Review of Draft	Steve Jenkinson	14-May-10	Defra guidance, vol 2 page 58 applies. Broad scale analysis usually sufficient at SMP level so not done in more detail. If we now feel we need to do this, that is an option.	No change made.	QRG Review continues on next line in column G		
48.2		02-Jun-10				Noted.	No more assessment required, but I think you need a note (if not already there) ahead of Table H1 to explain that for the purpose of the broad scale assessment the preferred options have been considered to have no damage costs.	Review of Resubmission	Steve Jenkinson	12-Aug-10	Text added to state this.	Para 1 of section H3 amended	Suggest "the do-something policy options are assumed to have...". Note also we are trying to use the term "policy option" instead of "policy". CSG to note for the future. CSG response - Noted (31 May 11)	Steve Jenkinson	27-Aug-10
49.1		09-Oct-09	Economic	Costs and Benefits	App. H Tables 1 to 7	These tables are a very useful reference source. I assume Table 5 uses some standard rates?	It would be helpful for any standard rates to be set out for information (eg. rates for capital works, property values). (NB. Table 5 Cost heading references footnote 5 – is this missing?)	Review of Draft	Steve Jenkinson	14-May-10	Tables added to appendix H	Section H2.2 of appendix H amended. Tables 1a and 1b added.	QRG Review continues on next line in column G		
49.2		02-Jun-10				Additions noted.	Is anything readily available on property values please?		Steve Jenkinson	12-Aug-10	Property values were taken from the National Property Database, 2005 update.	No action	Satisfied	Steve Jenkinson	27-Aug-10

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50		09-Oct-09	Economic	Decision Making	Appendix H	There is no mention of the Modelling and Decision Support Framework (MDSF) tool to assist with the economic analysis? Section HI discusses the economic viability of "preferred policy packages" [PP's] - I am not familiar with such an approach. There is also a suggestion from reading this Appendix that the Elected Members Forum (EMF) decided the policy options prior to the economic evidence being available?	Can the team please explain why this is so, what the "pp's might mean, and the implications of the policy options being made to fit the economics of the area? What if the EMF's preference is not affordable, or unsustainable?	Review of Draft	Jim Hutchison	14-May-10	MDSF was not used to help with the economic analysis. Appendix H explains how we did this. Added policy package to the glossary. This term was used to full satisfaction of the CSG and EMF and has not received negative local feedback. It is similar to 'policy scenarios' as used in the guidance, but without the potential confusion that the word scenario is often used for external factors, not for the policy options to deal with these factors. The PPs are the options that were appraised and then tested. The economic analysis concludes that the preferred options are viable (although of course there can be discussion about thresholds and categories (see issue 45). If that had not been the case, the choice of option would have been reviewed (in line with the approach in the guidance).	Glossary and appendix H amended.	Satisfied [JH] . Note, the approach adopted here needs to be clear when individual projects are considered in the future and I assume that the team will keep a good record of this for the foreseeable future, or at least until the next review of the plan. CSG Response - Having spoken to our ASM team this will be taken on board. (31 May 11)	Jim Hutchison	03-Jun-10
51		09-Oct-09	Economic	Sensitivity	use of agricultural land values	Where are the land values in the report adopted and how sensitive are the preferred policy options to the use of agricultural damages in the decision making? How have the land values fluctuated in this part of the country in recent years and what is the likely future trends?	Can the team please explain and set out which units are sensitive to these? And set out the trends please?	Review of Draft	Jim Hutchison	14-May-10	App H, page 2 explains the values used. See guidance, vol 2 page 58 on appropriateness of broad scale economic analysis. Agriculture is not a key issue in most of this SMP, apart from possibly Thornham / Holme. Added text about agricultural land in sensitivity analysis, but don't think that further analysis is needed.	Appendix H, section 2.1, para 5 added and section H2.3 added.	Satisfied	Jim Hutchison	03-Jun-10
52		09-Oct-09	Economic	Sensitivity	section H2	Where no data at end of assumed residual life [in 2020] what sensitivity has been applied? Also in 2.2 what sensitivities are made for the life of structures/banks, etc? Was the National Flood and Coastal Defence Database (NFCDD) not used? [JH] The text comments that the assessment is conservative because it does not include all assets affected, including properties with no residential property values. This approach is okay for frontages where the policy option is to spend money to defend assets, but not necessarily for other policy options. [SJ]	Can the team please clarify the sensitivity calculations on this? Also whether National Flood and Coastal Defence Database (NFCDD) was used and if so, which version?[JH] Could the CSG comment on whether any sensitivity testing was undertaken to check on the impact of including other assets not picked up directly in the economic assessment? [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	14-May-10	1. NFCDD was fully used and even updated for the SMP. Sensitivity of these issues was not explicitly tested as it's not seen as a key uncertainty. 2. All relevant PDZs have remaining defences (albeit sometimes realigned), which means the conservative approach is actually okay. Added text to appendix H for clarification, but we don't suggest doing additional sensitivity testing.	Appendix H, section 2.1, para 5 added. Section H2.2 amended and tables 1a and 1b added. Section H2.3 added.	Satisfied (JH, SJ)	Jim Hutchison Steve Jenkinson	03-Jun-10
53	Showstopper	09-Oct-09	Economic	Sustainability	section 2.4.2; PDZ summaries, Apps. G & H	In addition to SMPs being sustainable, they also need to be affordable and I couldn't see any parts of the reports that covered this aspect. [JH] App. H summarises the economic assessment and concludes on economic viability, but beyond that I could not see where this was drawn into the decision-making with regard to (with regard to) economic viability and likelihood of funding. I could not see any discussion on funding and affordability in either App. G or the PDZ summaries in the Main Doc. [SJ]	Can the team please explain where in the report affordability is dealt and what the conclusions are? This is especially important where there may be a small financial return to improvements and may still not obtain public finances to implement the planned improvements? [JH] Could the CSG please comment on this? [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	14-May-10	1. Various caveats about affordability now added to main SMP. 2. SMP does not speculate about future funding, other than caveating that this may not be available to implement all policies.	Section 1.1, para 5 amended.	Satisfied (JH, SJ)	Jim Hutchison Steve Jenkinson	03-Jun-10
54		09-Oct-09	Administrative	Consultation Model/Process	various	The role of some on the CSG is not clear, e.g. the Port of Wells Authority.	Can the team please explain the roles on the CSG and say if this role is any different from engaging Highways, for example?	Review of Draft	Jim Hutchison	14-May-10	CSG table in appendix B amended to show roles. Text also amended to show harbour users should be represented on the CSG for this SMP.	Appendix B amended.	Satisfied	Jim Hutchison	03-Jun-10
55		09-Oct-09	Administrative	Data and Mapping	Appendix G	The number of properties, commercial and homes, agricultural land, cultural and heritage losses could perhaps be better summarised in this Appendix as its information that will be required in any case. [JH] Does the plan summarise the number of properties that may be impacted by a NAI policy, including which epoch? [SJ]	Can the team please explain where this data can be found if it is not to be summarised in this Appendix?[JH] Could the CSG advise where this data is presented please? [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	14-May-10	1. Information about properties and assets in the tidal flood zone now added into section 2.1.5. 2. Information about the number of properties and assets in the tidal flood zone by 2105 added to appendix F.	1. Table 2.1 added to section 2.1.5 and extra para added. 2. Table added to appendix F, section F2.10.	New Table F4.3 noted (but this is not at Sect. F2.10). Satisfied.	Steve Jenkinson	03-Jun-10
56		09-Oct-09	Administrative	Data Issues	privately managed areas	At the RSPB reserve at Titchwell and the golf club at Brancaster, these owners have already made decisions for the longer term management of the area. Are the privately managed defences in the plan area known and where are they described in the plan?	Has the team examined the implications of these decisions on the coastal processes in the areas concerned and if so, can the plan confirm suitability? Can the team please clarify the issues of 3rd party defences?	Review of Draft	Jim Hutchison	14-May-10	1. Yes, described in section 2.3.3, 4.3 and policy statements for PDZ2B and 2E. 2. Issue of third party defences now clarified or action in action plan if not.	1. Policy statements for PDZ2B and 2E amended. 2. Appendix F, section 2.6 amended. Revised policy statements for PDZ2B, 2E and 2F. Actions added to action plan.	Satisfied	Jim Hutchison	03-Jun-10

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57		09-Oct-09	Administrative	Decision Making	App. G	Several PDZs do not have preferred policy appraisal tables, generally I think where limited or no intervention is planned. I may have missed an explanation for this, but don't all policy options warrant some level of appraisal?	Could the CSG clarify please?	Review of Draft	Steve Jenkinson	14-May-10	Did not do full appraisal of these because draft policy was chosen before full detailed appraisal ('playing field'). Broad scale assessment against the principles shown in the graphics (both in main doc and Appendix G). Added text in appendix G to clarify.	App G, section G1 para 3 added	Satisfied	Steve Jenkinson	03-Jun-10
58		09-Oct-09	Administrative	Linkages	section 3.2	The plan states how important the findings are used to ensure no future unsuitable planning decisions. [JH] Adequate engagement with spatial planners through the development of the SMP is important. [SJ]	Can the team please explain how this will be ensured? [JH] Could the CSG comment on the extent of engagement and confirm that any actions will be included in the Action Plan? [SJ]	Review of Draft	Jim Hutchison Steve Jenkinson	14-May-10	1. LDFs already reflect this. 2. Local planners sit on CSG.	1. Section 3.2, para 4 amended and action in action plan. 2. Actions added to action plan. Appendix B amended to show roles of CSG and EMF members.	I assume from your response that you are content with the level of engagement with spatial planning through the development of the SMP. With regard to the Action Plan, you have included key broad-scale actions including the need to communicate SMP outcomes to LA planners. This will also need to include possible adaptation measures for which a separate action re funding opportunities has been included. Satisfied. [SJ] Satisfied (JH)	Jim Hutchison Steve Jenkinson	03-Jun-10
59.1		09-Oct-09	Action Plan	Affordability	Main Doc. p110; Sect. 5	The new Action Plan (to be completed) will be a challenge to include the requirement for coastal strategies and studies in advance of possible new works. We need to ensure that the uncertainty relating to future funding is clearly communicated. [PP] There are a number of policies (sect 4) which are dependent upon future studies, subject to confirmation etc. Are we confident that those presented at the moment are the most deliverable given what we know now, taking into account likelihood of funding etc – i.e.. not raising expectations unduly? [SJ]	I suggest that the SMP includes a caveat in this Section, which reiterates that the "do something" policy options contained within the SMP2 ("hold the line" and "managed realignment)" do not guarantee new capital or maintenance works and will be dependent on government and/or private funding. This will help to ensure that the public do not rely entirely on these policies. [PP] Could the CSG comment please? [SJ]	Review of Draft	Phil Perkins Steve Jenkinson	14-May-10	1. Several caveats about future funding now included in main SMP. 2. Coastal monitoring sub-section added shows that much is already being done.	1. Amended text in section 1.1 (para 5), section 2.4.1 (point 3), section 3.1 (para 3), new para added to section 3.1 and amended section 5.2. 2. Added new sub-section to section 2.1.	QRG Review continues on next line in column G		
59.2		02-Jun-10				Satisfied (PP) My query was seeking some reassurance from the CSG, given the uncertainty over funding and the outcomes of future studies, that they considered that the proposed policy options were realistic (deliverable)? [SJ]	Could the team please comment? [SJ]		Steve Jenkinson	12-Aug-10	We are confident that the policies in the final SMP are affordable. CSG and EMF have agreed the policies in the final SMP. Both CSG and EMF have discussed affordability of policies on several occasions and the final policies have been agreed following these discussions.	No action	Clearly funding will continue to be an uncertainty but reassured that CSG and EMF consider policy options are affordable based on what we know at this stage. Satisfied. (PP, SJ)	Phil Perkins Steve Jenkinson	27-Aug-10
60		09-Oct-09	Action Plan	Engagement	Main Doc Section 5	Although the policy statements suggest that there are actions to be included in the 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.	Develop Action Plan for inclusion in section 5 in the final version and explain how the team plans to consult on it when its ready?	Review of Draft	Andy Parsons	14-May-10	Action plan being developed. Will be a living document and part of intended wider stakeholder involvement in the coming years.	Draft action plan added.	Satisfied	Andy Parsons	03-Jun-10
61		09-Oct-09	Action Plan	Linkages	General to draft plan document (e.g. p3 2nd para after table)	The links between the 'intent of management' of the SMP and how this intent will be implemented is not always clear.	Lead Authority to consider placing more emphasis on the importance of the Action Plan throughout the main plan document (accepting that the main AP has not yet been written).	Review of Draft	Lee Swift	14-May-10	More references to action plan added throughout main SMP.	Final para added to section 3.3, para 3 of section 3.1 amended, final para of section 4.1. References added to policy statements for PDZ1A, 1C, 1D, 2D, 2F, 2G, 2L and 3A.	Satisfied	Lee Swift	03-Jun-10
62.1		09-Oct-09	Action Plan	Monitor/Review	section 5; Plan doc: section 1.3.1.	This section states the role of the action plan but does not set out the role of the coastal group to monitor the delivery of the plan. [JH] There is no reference to the role of the Coastal Group in SMP development or subsequent delivery of the plan. [LS]	Can the team please: 1. explain when the action plan might be available to review and 2. please explain the governance arrangements for the preparation and management of the action plan? [JH] Lead authority to clarify role (if any) of the Coastal Group. Did the CSG seek advice from the Coastal Group prior to issue of the Draft plan? [LS]	Review of Draft	Jim Hutchison Lee Swift	14-May-10	1. Now. 2. Still not fully decided. 3. Chairman of EACG sits on CSG.	1. Action plan added into chapter 5. 2. Chapter 5 amended to add information about how action plan will be implemented. 3. Section 1.1 amended to include possible future role of EACG in implementing SMP policies.	QRG Review continues on next line in column G		
62.2		03-Jun-10				Satisfied subject to CSG agreeing to fully consider an appropriate governance arrangement as soon as possible. [JH] Satisfied (LS)	Can the team please confirm? [JH]	Review of Resubmission	Jim Hutchison	12-Aug-10	Text in chapter 5 states that coastal group will monitor progress with action plan and report on this - action already in action plan. Unable to confirm governance for action plan with EACG, so actions added to AP. RH will supply to EA a data management tool containing all the data used in producing the SMP. This will be on a CD to be held by S&DP team and made available to other teams on request.	Action added to action plan (SMP-wide actions) to organise access to AP and who will update it. Separate action for EA to maintain data management tool and make it available to other teams on request.	Satisfied (JH, LS)	Jim Hutchison Lee Swift	27-Aug-10

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Additional Comments on Documents Provided Since Consultation Version															
63		02-May-10	Action Plan	Monitor/Review	Main Report Section 5.	The report notes that the Access database will be used as a living document in coming years.	Could the Project Team clarify who will have access to the database, and what will be available for stakeholders and the public to view and monitor progress with delivery, eg. on the web?	Review of Resubmission	Steve Jenkinson	12-Aug-10	Database will be held on EACG website. EACG to confirm who will have access to it and how it will be updated as actions are completed and others appear. Action added to action plan. Action for coastal group (CSG) to monitor progress with completing actions and report on this is already in action plan.	Action added to action plan (SMP-wide actions) to organise access to AP and who will update it.	I assume that it will not be the full Access database on the website, but some form of Action Plan as included in the SMP documents. Good to see action included to clarify responsibilities. Satisfied.	Steve Jenkinson	27-Aug-10
64		02-May-10	Action Plan	Monitor/Review	Main Report Section 5.	The Action Plan includes a number of proposed studies.	Could the Project Team comment on whether these studies need to be externally commissioned studies, or whether some of these study outputs could perhaps be provided through in-house assessments?	Review of Resubmission	Steve Jenkinson	12-Aug-10	Most of the studies will happen through Shoreline Management Group's coastal monitoring programme. Others will be in-house, such as the RHCP model etc. Consideration will be given to progressing these actions in the most cost-efficient way to achieve the results required.	No action	Satisfied	Steve Jenkinson	27-Aug-10
65		02-May-10	Action Plan	Affordability	Main Report Section 5.	The Action Plan notes that implementation is subject to funding, but there does not appear to be any estimate of costs?	Could the Project Team advise whether they intend producing a broad-brush cost profile for the Action Plan, to get some idea of cost implications? If funding proves to be difficult how will activities be prioritised?	Review of Resubmission	Steve Jenkinson	12-Aug-10	Confirmed with SJ that we're too far down the line to include costs against each action. Enough to say that we will look carefully at affordability and priorities as the actions are considered and brought forward.	Final para of section 5 amended	Satisfied	Steve Jenkinson	27-Aug-10
Date Received : Sep 09		**Date Collated review circulated: 26-Nov-09**		**Summary of Review: 26 Nov 09**		**There are a total of 62 Items listed on the Review sheet, of which 11 have been identified as showstoppers. There are a further 51 Quality matters. Please advise Jenny Buffrey if you would like a meeting or teleconference with the QRG to discuss, clarify and agree next steps.**					**Extract from the minutes of the Anglian Eastern Regional Flood Defence Committee (RFDC) - 9 July 2010, Boardroom, Iceni House, Ipswich** ***Shoreline Management Plans (SMP) Approval (EFD10/38)*** ***Resolution*** ***A. The Committee recommended the North Norfolk (SMP5) and Suffolk (SMP7) Shoreline Management Plans to the Environment Agency's Anglian Regional Director for approval.*** ***B. The Committee adopted the policies set out in these Shoreline Management Plans.***				
Date Responses Received: 18-May-10		**Date Collated review circulated: 1-Jul-10**		**Summary of Review: 1-Jul-10**		**There are 17 items outstanding. This includes 3 items that have been added following a review of the Action Plan.** **Please address all outstanding items and resubmit this review sheet, along with any amended documents on a CD, to Jenny Buffrey.**									
Date Responses Received: 13-Aug-10		**Date Collated review circulated: 10-Sep-10**		**Summary of Review:10-Sep-10**		**There are 2 main items and 3 Q & P items outstanding. Please address all outstanding items and resubmit this review sheet, along with any amended documents on a CD, to Jenny Buffrey.**									
Date Responses Received: 13-Sep-10		**Summary of Review: 27-Sep-10**				**All matters are now satisfied.**									
Summary of Review: 25 July 11						**This Environment Agency led plan has been developed through a partnership approach with a number of bodies including the local authorities, Natural England and English Heritage. The plan covers the area between St Edmunds point at the entrance to the Wash, through to Kelling Hard and the rising cliffs at Weybourne in the east. The coastal area is characterised by a one to three-kilometre wide strip of low-lying land - inland of this the land rises relatively steeply.**									
						The plan is promoting a gradual move towards natural processes to enable more sustainable management approaches. For some of the low-lying areas that are currently defended, the intention is to move the defence line further inland. This has led to some changes to previous SMP1 Hold the Line policy options. However, there remains some uncertainty at this stage regarding the feasibility and benefits of doing this, and this is reflected in several of the policy units which are presented as either Hold the Line or Managed Realignment in the third epoch. It has been recognised that further monitoring and study will be required as a priority to resolve these issues, and actions have been included in the Action Plan accordingly.									
						Linked to the promotion of Managed Realignment or No Active Intervention policy options is the need to engage with stakeholders, particularly landowners. Stakeholder engagement clearly played an important part in the development of the SMP, and the SMP partners succeeded in engaging local communities and landowners in the SMP process. There were public drop-in events from early on in the review process and key stakeholders were involved in confirming proposals made by the SMP partners. Although there was some criticism about the timing of the consultation on the draft SMP, the partners responded to this and made it clear that comments received during this period were fully considered in the development of the final SMP policies.									
						It will be equally important to ensure that stakeholders are involved in the implementation of the plan. This will ensure that stakeholders are clear on the implications of proposed management activities and can discuss what opportunities and constraints there may be for them. This process will also need to include engagement with spatial planners and consideration of funding options particularly where adaptation is being considered. The Action Plan will be key to this as it includes a number of actions to communicate with local communities, businesses and landowners when implementing the policy options in the final SMP									

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						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. The overriding public interest arguments in the WFD assessment will need to be tested for strategies and schemes arising from the SMP, and both assessments will need to be reviewed as part of the next SMP review (SMP3). The outcome of the Habitat Regulations Assessment was that it was not possible to conclude that the preferred SMP would not have an adverse effect on the integrity of the internationally important designated sites in the area. Natural England has confirmed in their letter of 18 November 2010, their support for the proposed policies and agreed that there was a case for Imperative Reasons of Overriding Public Interest (IROPI). Consequently an IROPI statement of case was made to Defra. Confirmation that Defra has no objections to proposed plan approval was received on 1 July 2011.								
						Overall the plan moves this shoreline a step closer towards a more sustainable position and one that is supported by partners and the local communities. It is important that the team continues to liaise with the communities affected and considers the outcomes of the Pathfinder projects when available to test some of the findings in this plan.								