

## **Appendix B Stakeholder Engagement**

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## **Part 1 – Stakeholder engagement strategy**

### **B1 Stakeholder engagement strategy**

#### **B1.1 Introduction**

Since the completion of the SMP1 in December 2006, a sub cell group (2d) of ACAG was set up and the first meeting was held on 21 May 1997. The Sub cell group's terms of reference were:

- to co-ordinate and develop the mechanisms to implement the policies adopted for sub cell 2d,
- to prepare for the review of the SMP,
- to promote liaison between the members of the sub cell group,
- to promote external liaison between members of the sub cell group, responsible groups, organisations and other interested parties,
- to identify the need for studies extending across the boundaries of coastal defence authorities,
- to promote awareness of all previous and on-going data collection and analysis in The Wash, to review the adequacy and identify future data needs.

The membership of the group was made up of those Authorities with statutory responsibilities and a major interest in the sub cell.

There were two meetings per year, sometimes three until the review of the SMP was commenced in June 2006. At which point the membership of the sub cell group was reviewed to become the Client Steering Group.

An Annual Members meeting was held in September 2001, where members of local authorities discussed shoreline management planning and involvement in the development of the next phase of SMPs.

In addition to Environment Agency led meetings, The Wash Estuary Strategy Group, a partnership representing a wide range of stakeholders and organisations, some of which are also represented in SMP 2 in their own right, has also been organising an Annual Conference for The Wash since November 2003. Progress on the SMP has been provided and discussed at every conference since its inception.

This appendix therefore outlines the stakeholder engagement strategy for the development of the SMP2 and details how stakeholder involvement was achieved at each stage of the plan, from the preparation to dissemination.

Three main groups of stakeholders were involved in the SMP development:

1. The Client Steering Group (CSG);
2. Elected Members Forum (EMF);
3. Key Stakeholders Group (KSG);

and other Stakeholders.

## **B1.2 What was the aim of this engagement strategy?**

To assist us in planning our engagement approach for the delivery of a publicly acceptable and practicably deliverable SMP for The Wash coast, that considers wherever possible, wider social and environmental issues in the context of flood and coastal erosion risk.

In developing our engagement approach we considered the following:

- 1) What specifically did we need to achieve through the SMP process and how did this link to the objectives of the lead partners?
- 2) Who did we have to consult and engage with? How and why should we engage and involve others?
- 3) What were the boundaries of the work in terms of resources, time and what was or wasn't within the remit of a SMP?
- 4) What were the timescales for decision-making?
- 5) How we will demonstrate that we have met our objective?

## **B1.3 What was our main objective?**

To develop a revised SMP for The Wash coast that is practicably deliverable and considers, wherever possible, wider social and environmental issues in the context of flood and coastal erosion risk.

## **B1.4 Why did we undertake this work?**

We needed to consider the long-term management of our coastline for a variety of reasons. There were already many properties at risk from flooding or erosion in the coastal and estuarine flood plain of The Wash. As well as property, The Wash coast is important for many rural and marine businesses including agriculture, fisheries, tourism, navigation and energy production. Most of The Wash coast is home to important habitats and species and is designated as a Special Protection Area under the European Birds directive and a Special Area of Conservation under the European Habitats directive. Much of this coast is also a Ramsar site – a wetland of international importance.

As a result of climate change and sea level rise, present and future flood and erosion risks are increasing. We must therefore plan ahead to maintain coastal

communities, culture, landscape, economies and habitats and wildlife. We may need to adapt and evolve our management approaches over time and SMPs are the appropriate high level tool for planning coastal management activities. SMPs consider coastal management over a 100 year time scale. They aim to work with natural coastal processes and are used to underpin local planning decisions in the built and natural environment by informing local development frameworks.

Revising the existing Shoreline Management Plans by December 2010 is a Government requirement.

## **B1.5 What other objectives did we have?**

The Environment Agency and its local authority partners needed to work together to agree how we could jointly develop and deliver a SMP for The Wash. The SMP will allow us, as coastal operating authorities, to reduce flooding and erosion risk to people, property and important habitats through coastal management options around The Wash coast whilst seeking wider environmental and social opportunities wherever possible.

The most appropriate level of stakeholder engagement depended on the characteristics of The Wash coastline and the likely risks associated with it, that is, the degree of uncertainty over acceptable policies and contention that might arise. It also depended on the number of interested parties and organisations involved with The Wash coast and how we could engage with them.

An approach recommended by the Environment Agency's 'Making Space for Water' project is set out below. This is now an adopted approach for many of our strategies and projects:

1. Engage early to explain that something new is coming and that this may mean a change, but people will be involved throughout the process.
2. Begin to draw out what local communities' value and allow us to engage with potential partners who can help or take on some of those criteria/issues.
3. Offer an opportunity to start delivering difficult messages in terms of climate change, sea level rise, limited funds and potential land-use change.
4. Offer circumstances to highlight potential opportunities for enhancing the environment and the criteria that people value locally.
5. Establish the types of stakeholder groups that will be key to developing the plan, and others who need to be involved, but perhaps less frequently.

In theory this approach helps to set the framework for this stakeholder engagement strategy as well as the direction of the SMP in terms of the key

issues local communities will want it to consider. Where the SMP cannot deliver a specific issue as part of our approach, we must say so.

## **B1.6 What work did we do with partners, stakeholders, communities and the wider public?**

Through our SMP engagement we:

### ***Informed and raised awareness***

We worked with local communities to raise awareness of flood and erosion risk in The Wash and how we could plan for future uncertainties through the SMP.

### ***Involved others and gathered Information***

We worked with partners and local communities to understand the most acceptable way to manage flood and erosion risk in The Wash.

### ***Developed partnerships***

We actively sought out partners who would be able to assist in developing the Plan.

We worked with these partners to establish where there were wider social and environmental opportunities and how they could be progressed.

We worked with the key maritime local authorities to deliver a publicly acceptable plan that, as operating authorities, we could all support and implement together.

Engaging a broad range of partners was also seen as a foundation for future relationships concerning the strategies and projects that will develop from the SMP. This engagement was also key in the early stages of data gathering and sharing of information.

## **B1.7 What were the benefits and constraints of working with others?**

In developing this engagement plan we considered some of the benefits and difficulties of working with others and also what reasons others may have for engaging with us. In doing this we were mindful of others' agendas and views, and adapted how we involved others accordingly.

We were clear about what others can influence and work with us on. We also explained our constraints, for example what an SMP can and can't do, and strove to be clear and consistent in our messages. We also clarified and agreed with our operating partners what our role was in terms of flood risk management and the environment, and explained that our remit differs from the broader role of our LA partners. This distinction was captured as part of our engagement planning discussions and we made sure everyone understood their role in the SMP. This helped us manage our expectations and those of others.

## **B1.8 How we show that we have met our objectives, and how we measure progress and success**

The engagement strategy was presented as a live document that the Client Steering Group (CSG) and Elected Members Forum (EMF) discussed at each meeting, and updated whenever necessary.

We developed an effective feedback mechanism so that all comments and issues raised by those we engaged with were recorded, considered, and dealt with appropriately (see consultation report for details)

We also took into account how best to feedback to those we engaged with, demonstrating how their views have been considered, and where they have influenced the SMP process (see consultation report for details).

We conducted a stakeholder analysis to make sure we had identified those needing to be involved. We discussed what their involvement should be, and what their issues could be, enabling us to tailor engagement approaches accordingly.

## **B1.9 Who did we have to involve?**

We considered who our stakeholders were by looking at the following 'types' of stakeholder:

Who did we have to talk to? - Statutory partners/consultees

- Environment Agency and local authority partners' staff and officers with coastal remits and interests who are steering the SMP process. These are Norfolk County Council, South Holland District Council, Borough Council of King's Lynn & West Norfolk, Boston Borough Council, East Lindsey District Council and Lincolnshire County Council.

We were mindful of our own Environment Agency and local authority colleagues as much as our wider partners and other external organisations, groups and individuals. We planned who to talk to and when, and made sure there was plenty of early engagement with our own staff so we maximised cross-functional opportunities.

For the Shoreline Management Plan (SMP);

- Local Authority members who have a political remit as democratic representatives of the local population and their organisation. For this SMP, these were members of Norfolk County Council, South Holland District Council, Borough Council of King's Lynn & West Norfolk, Boston

Borough Council, East Lindsey District Council and Lincolnshire County Council.

- Natural England as government representatives for conservation, habitats and species

For the Strategic Environmental Assessment (SEA):

- English Heritage as government representatives for the historic environment, including scheduled monuments, listed buildings, historic battlefields and conservation areas
- Norfolk Landscape Archaeology (NLA) maintains the Historic Environment Record (HER) for Norfolk and advises the local authorities, English Heritage and the Norfolk Coast AONB partnership on historic environment issues in the SMP area.

## **B1.10 Who did we need to involve: key stakeholders**

### *'High level' stakeholders*

Those with the most at stake or with significant influence over those they represent. For example:

- parish councils
- large landowners, either individuals or organisations
- non-governmental organisations
- specific community/interest groups with a lot at stake
- specific interest groups representing a large local membership

These stakeholders required the most involvement and therefore several approaches were needed:

- involving through discussion
- informing through newsletter or websites
- information-gathering through questionnaires and workshops
- joint decisions through dialogue and/or partnership.

### *'Enhanced level' stakeholders*

Those who could be affected by changes in policy and those who could help influence others or help raise awareness. Also perhaps those who were likely to have contentious views and may become (as a result) 'high level' stakeholders who needed to become more involved.

These stakeholders required less involvement through the following approaches:

- involving through discussion
- informing through newsletter or websites
- information gathering through questionnaires and workshops

Examples are ports, navigation interests, fisheries groups, specific communities and affected individuals.



### *'Standard level' stakeholders*

Those who were interested in the work but may be less affected by the policies. These stakeholders required the least involvement through the following approaches:

- informing through newsletter or websites
- information gathering through questionnaires and workshops

Examples are the general public and local authorities and organisations/groups outside the SMP boundary.

## **B1.11 Shoreline Management Plan (SMP) engagement structure**

The SMP pilots trialled several different model approaches for engaging with stakeholders, partners, communities and the public. We selected the preferred model approach from the SMP guidance, (Appendix A, SMP guidance, 2006).

We placed greater emphasis on community involvement when preparing all our plans. We engaged organisations and communities at an early stage in the preparation of The Wash SMP when the Client Steering Group was developing policies, and we continued to involve them throughout the various stages of the SMP process.

To manage our engagement approach we selected the following model of three main groups to be involved in the review of the SMP:

- the Client Steering Group (CSG)
- an Elected Members Forum (EMF)
- other stakeholders

### ***Client Steering Group (CSG)***

The CSG had overall responsibility for the delivery of the SMP. The CSG initiated the SMP development process, undertook the scoping tasks required and managed the development and adoption processes.

The Wash CSG was formed as a sub-group of the East Anglia Coastal Group (EACG). It was made up of the main client local authorities for the SMP, plus representatives from Natural England and other authorities such as Norfolk County Council. As a minimum it was recommended that representatives cover the key disciplines of engineering, planning and conservation. The Environment Agency was the lead authority for this SMP and was responsible for procuring, managing and administration of the consultant, Royal Haskoning.

Roles and responsibilities of the CSG included:

- providing client expertise in deciding the scope and extent of the SMP
- maintaining liaison with EA Head Office
- reporting back to client organisations
- working in partnership with the consultant to develop:
  - the overall scope of the SMP
  - the issues to be dealt with by the SMP
  - the priority of the issues
  - the objectives for the SMP
  - the draft policies for the SMP
  
- directing consultation, including the methods and materials we use
- overseeing the public consultation
- seeking ratification of the SMP policies

Also, the following as appropriate:

- liaising with local members to establish the Elected Members' Forum (EMF) and Key Stakeholder Group (KSG)
- convening meetings of the Elected Members' Forum and Key Stakeholder Group
- supporting the Elected Members' Forum

The membership of the CSG (at 26<sup>th</sup> March 2010) is:

<b>Name</b>	<b>Organisation</b>
Mark Robinson (Chair)	Environment Agency (Northern Area Coastal Advisor)
Onoriode Iboje	Environment Agency (Project Manager)
Mike Dugher	Environment Agency (Northern Area Coastal Manager)
Nigel Woonton	Environment Agency (Central Area)
Duncan Campbell	Environment Agency (Technical Specialist)
Ellie Bendall	Environment Agency (Senior Environmental Assessment Officer)
Marie Coleman	Environment Agency (Project Assistant)
Jaap Flikweert	Royal Haskoning
Victoria Clipsham	Royal Haskoning
Mat Cork	Royal Haskoning (Environmental Specialist)
Steve Williams	South Holland District Council
Peter Udy	Boston Borough Council
John Norton	Borough Council of King's Lynn and West Norfolk
Richard Belfield	Lincolnshire County Council
David Hickman	Lincolnshire County Council
Anne Shoreland	East Lindsey District Council
John Jones	Norfolk County Council
Nick Tribe	Natural England
Rick Keymer	Natural England
Ian Butterfield	Natural England
Hugh Drake	National Farmers Union Also representing Lincolnshire Internal Drainage Boards
Paul Tame	National Farmers Union
Jim Williams	English Heritage
Jon Watson	Wash Estuary Strategy Group
John Sharpe/ Amy Crossley	Royal Society for the Protection of Birds
Peter Rushmer	Wash and North Norfolk Coast (EMS) Advisory Group
Brian Orde	Water Management Alliance (King's Lynn Internal drainage Board)

Previous members of the CSG:

<b>Name</b>	<b>Organisation</b>	<b>Dates</b>
Roy Lobley (Chair)	Environment Agency	to November 2008
Annabelle Foot	Environment Agency	to February 2008
Lynsey Thompson	Environment Agency	to June 2007
Vicky Eade	Environment Agency	to October 2007
Ian Russell	Environment Agency	to June 2009
Neil Pike	Natural England	to January 2008
George Dann	Water Management Alliance	to September 2008
Jon Watson	Lincolnshire County Council	to June 2009
Simon Machen	East Lindsey District Council	to April 2009
Stuart Birkett	Boston Borough Council	to October 2007
Michelle Taylor	Environment Agency	to October 2009
Peter Doktor	Environment Agency (Senior Environmental Assessment Officer)	to October 2009
Tammy Smalley	Wash Estuary Management Plan Officer	to October 2009
Phillip Pearson	Royal Society for the Protection of Birds	to October 2009

CSG meetings have also been attended by Fola Ogunyoye (Royal Haskoning), Geoff Darch (Atkins Consultants, Lincolnshire Coastal Study) and Guy Szomi (Environment Agency)

### ***Elected Members' Forum (EMF)***

Involving elected members in developing the SMP reflects the 'Cabinet' style approach to decision-making operating in many local authorities. The EMF comprised elected member representatives from client local authorities and members of the Environment Agency's Regional Flood Defence Committee. Members were involved from the beginning, thereby minimising the risks of producing a document with policies that are not approved by the operating authorities. The members were involved through a forum, building trust and understanding with the Client Steering Group.

Roles and responsibilities of the elected members included:

- agreeing the activities of the Client Steering Group
- agreeing the overall scope of the SMP
- agreeing the stakeholder engagement strategy, including when and how we involve them at each stage of the SMP process
- agreeing who the key stakeholders are
- agreeing the issues to be dealt with by the SMP
- agreeing the priority of the issues
- agreeing the objectives for the SMP
- reviewing and agreeing the policies to be contained in the draft SMP
- seeking ratification of SMP policies

The membership of the Elected Members' Forum (at 26<sup>th</sup> March 2010) is:

<b>Name</b>	<b>Organisation</b>
Mike Dugher (Chair)	Environment Agency (Northern Area Coastal Manager)
Onoriode Iboje	Environment Agency (Project Manager)
Mark Robinson	Environment Agency (Northern Area Coastal Advisor)
Nigel Woonton	Environment Agency (Central Area)
Peta Denham	Environment Agency (Central Area Flood and Coastal risk Manager)
Andy Baxendale	Environment Agency (Northern Area Manager)
Marie Coleman	Environment Agency (Project Assistant)
Jaap Flikweert	Royal Haskoning
Victoria Clipsham	Royal Haskoning
Mat Cork	Royal Haskoning (Environmental Specialist)
Cllr Brian Long	Borough Council of King's Lynn & West Norfolk
Cllr Rod Payn	Borough Council of King's Lynn & West Norfolk
Cllr Alison Austin	Boston Borough Council
Cllr Richard Leggott	Boston Borough Council
Cllr Tony Wright	Norfolk County Council
Cllr Eddy Poll	Lincolnshire County Council
Cllr Steve F Williams	South Holland District Council
Cllr Paul Espin	South Holland District Council
Steve Williams	South Holland District Council
Cllr Brian Burdett	East Lindsey District Council
Bud Shields	Regional Flood Defence Committee
Steve Wheatley	Regional Flood Defence Committee

Previous members of the EMF:

<b>Name</b>	<b>Organisation</b>	<b>Dates</b>
Colin Lee (Chair)	Environment Agency	to October 2008
Roy Lobley	Environment Agency	to November 2008
Cllr Sheila Roy	Lincolnshire County Council	to May 2008
Ben Hornigold	Regional Flood Defence Committee	to May 2009
Michelle Taylor	Environment Agency	to October 2009

### ***Key Stakeholder Group (KSG)***

A key stakeholder is a person or organisation with a significant interest in the preparation of, and outcomes from, a shoreline management plan. This includes agencies, authorities, organisations and private bodies with responsibilities or ownerships that affect the overall management of the shoreline in a plan.

The KSG acted as a focal point for discussion and consultation through development of the plan. The membership of the group provided representation of the primary interests within the study area, making sure we considered all interests during the review of issues. This group was involved through meetings and workshops, but membership was carefully managed to make sure meetings did not become unmanageable. This group provided direct feedback and information to the CSG and EMF.

Roles and responsibilities of the KSG included:

- amending its membership to suit the issues being considered in the SMP
- suggesting issues and their priorities to be considered in the SMP
- meeting periodically throughout the production of the SMP
- providing comments on proposals being made by the CSG and EMF

The organisations in the KSG are:

Borough Council of Kings Lynn and West Norfolk	Lincolnshire Police and Wildlife Liaison Officer
Boston and District Archaeological Society	Lincolnshire Tourism
Boston Borough Council	Lincolnshire Wildlife Trust
British Association for Shooting and Conservation	Maritime Leisure
Cambridgeshire County and Fenland District Council	Mayor of Hunstanton
Centre for Rural Economy, Newcastle University	National Farmers Union
Chair of the EMS Kings Lynn and West Norfolk Advisory Group	Natural England
East Lindsey District Council	NFU and 4th IDB and WESG
East Rudham Parish Council	Norfolk Association of Parish and Town Councils
Eastern Sea Fisheries Joint Committee	Norfolk Coast Partnership
English Heritage	Norfolk County Council
Environment Agency	Norfolk Resident
Federation of Small Businesses	Norfolk Wildlife Trust
Fenland District Council	North Norfolk County Council
Fenland Wildfowlers Association	Port of Boston Ltd
Fens Tourism Ltd	RAF Wainfleet
Freiston Parish Council	Ramblers' Association
Green Quay	RSPB
Green Quay and Kings Lynn IDB	Scolt Head and District Common Rightholders' Association
Groundwork Lincolnshire	Sneaths Mill Trust
H. Waltham and Co.	Society for Lincolnshire History and Archaeology
Heritage Trust for Lincolnshire	South Holland District Council
HM Coastguard	South Holland Ramblers Association
Holme Parish Council	Stradsett Estate Farms
Hungarian Partner of WESG	Sutton Bridge Resident
Hunstanton Civic Society	Terrington St Clements Parish Council
J. E. Piccaver and Co	The Wash N. Norfolk European Marine Site
Jack Buck farms	The Wash NNR, Natural England
Job Centre Plus Lincolnshire and Rutland	Tydd St Mary Parish Council
Lincolnshire County Council	University of Lincoln
Lincolnshire Wildlife Trust	Vine House Farm
Lincolnshire Badger Group	Wash Estuary Strategy Group
Lincolnshire Biodiversity Partnership	Water Management Alliance (King's Lynn Internal drainage Board)
Lincolnshire County Council	Welland and Deepings IDB
Lincolnshire Internal drainage Boards	Wiggenhall St Germans Parish Council
Lincolnshire Tourism	Wyberton Parish Council and Parker Yachts
Lincolnshire Fenland Leader+	Anglian Water

## B1.12 How have we engaged others?

In addition to the formal groups required to oversee the SMP process, it was recommended that the relevant operating authorities set up individual project teams within their own organisations to make sure that all functions were informed about the SMP. This was organised and managed by the officers on the Client Steering Group.

The CSG also maintained a list of other stakeholders with an interest in the SMP, who were not members of the Key Stakeholder Group. This included their contact details and what their interest was. The CSG updated this list during the SMP process. The list of other stakeholders is:

<b>ORGANISATIONS</b>
Defra Rural Marine & Environment Division
East of England Business Group
East of England Tourist Board
Sandringham Estates
Heacham North Beach Owners Association
Hunstanton Town Council
Snettisham Parish Council
The Crown Estate
Local businesses
Ken Hill Estates
Heacham South Beach
Heacham Parish Council
Caravan Site Owners & Operators

Roles and responsibilities of the other stakeholders in The Wash SMP area included:

- providing information about their areas of interest
- identifying issues of concern to them about the management of the coastline
- responding about the effect of the draft proposed policies on their areas of interest



## **B1.13 Key local staff in SMP partner organisations**

Named key staff within the SMP partner operating authorities that provided support and advice to SMP project (in addition to those who attended CSG/EMF meetings) are:

### Environment Agency

Northern Area Manager – Andy Baxendale  
Central Area Manager – Geoff Brighty  
Northern Area Coastal Manager – Mike Dugher  
Central Area Flood Risk Manager – Peta Denham  
Strategic and Development Planning Team Leader – Neil Pope  
Northern Area Coastal Advisor – Mark Robinson  
Central Area Coastal Project Manager – Nigel Woonton  
SMP Technical Specialist – Duncan Campbell  
Project Manager – Onoriode Iboje  
Project Assistant – Marie Coleman  
Flood Incident Management - David Kemp  
Flood Risk Mapping and Data Management – Graham Verrier  
National Capital Programme Management Service - Chris Allwork  
Habitat Creation Programme - Paul Miller  
National Environmental Assessment Service –Karl Fuller  
National Environmental Assessment Service –Ellie Bendall  
NRG Technical Manager – Jenny Buffrey  
Fisheries, Recreation and Biodiversity - Nikki Loveday  
Development and Flood Risk – Debbie Morris  
Planning Liaison – Annette Hewitson  
Environment Management – Carolyn Penney  
Coastal Communications – Alison Hirst/ Shona O'Donovan/ Gemma Mitchell

### Boston Borough Council

Communications Manager – Sue Lawson  
Forward Planning Officer – Peter Udy

### Kings Lynn & West Norfolk Borough Council

Portfolio holder for the Environment - Cllr Brian Long  
Executive Director Regeneration – John Norton  
Executive Director Development Services – Geoff Hall  
Executive Director Environmental Health and Housing – Andy Piper  
Local Development Framework Manager – Alan Gomm  
Planning Policy Manager – Peter Jermamy  
Environmental Planner – Gemma Cousins  
Tourism Manager – Tim Humphreys  
Emergency Planning Officer – Alison Haines  
Communications Manager- Sharon Clifton

South Holland District Council

Head of Planning and Development – Steve Williams  
Communications Manager- Sharon Dabell

East Lindsey District Council

Planning and Housing Strategy Manager – Anne Shorland  
Communications Officer- James Gilbert

Lincolnshire County Council

Strategic Partnerships Manager – David Hickman  
Communications Manager- Janet Marshall

Norfolk County Council

Portfolio holder for the Environment – Cllr Ian Monson  
Communications Officer – John Birchall

Natural England

Coastal Conservation Adviser - John Jackson  
Senior Communications Specialist - Linzee Kottman  
Senior Planning Specialist - Clive Doarks  
Ian Butterfield

English Heritage

Regional Science Advisor (East Midlands) - Dr Jim Williams  
Inspector of Ancient Monuments - William Fletcher

## **B1.14 Implementing the engagement plan**

We produced feedback forms at different stages of the SMP process to obtain local information from all stakeholders, and to find out their level of interest in the SMP. The three produced so far can be found in subsequent sections. We have used these to obtain comments from stakeholders on the SMP process so far, and to find out from key stakeholders what they think about the draft policies proposed for The Wash coast.

We also produced another version of the feedback form that was used during the public consultation period from 12 October 2009 until 15 January 2010. Copies of this were available to download from the Environment Agency's website. Paper copies of the feedback form were also sent to all stakeholders that we had contact details for.

## **B1.15 How we reviewed the strategy and shared lessons learnt**

Following the public consultation period, we looked at all the comments we received about our proposed policies, and the CSG and EMF agreed on changes to the draft SMP as required. Once complete, we wrote to everyone who sent in

comments during the public consultation period to let them know what changes had been made to the draft SMP, and what will happen next in the process.

Based on the responses received during the consultation period, an Action Plan was developed for the SMP. The Action Plan sets out the recommendations of the SMP. The SMP guidance states that the purpose of the Action Plan is to summarise the actions that are required before the next review of the SMP. A draft of the Action Plan was developed in Stage 3 alongside the draft SMP document for consultation. The Action Plan is a live document, and therefore it contains columns to allow recording of the start and end dates of the specific Action, and the status of the Action (either not yet commenced, ongoing or complete).

## **B1.16 Supporting Information**

### **B1.16.1 What are the benefits and constraints of working with others?**

#### ***What's in it for them? Opportunities:***

##### *Communities and stakeholders:*

An opportunity to influence a process not be part of a tick-box exercise.  
An opportunity to understand their coast and engage over its future.  
An opportunity to see wider social and environmental benefits in their area.  
An opportunity to challenge views and opinions.  
Time to plan.

##### *Partners:*

An opportunity to share in the decision-making process.  
An opportunity to influence the outcomes for their agendas.  
A chance to share resources.  
An opportunity to tap into coastal expertise and learning.  
A chance to identify and share opportunities for wider benefits.  
The opportunity to deliver an acceptable SMP that is practicable.  
An opportunity to build trust with other partners and communities.  
An opportunity to understand their coast and engage over its future.  
Time to plan.

#### **What's in it for them? Constraints:**

##### *Communities and stakeholders:*

The opportunity to lobby for other issues.  
A vehicle for change or a vehicle for status-quo?  
A political tool.  
An opportunity to challenge.

##### *Partners:*

An opportunity to drive for perverse outcomes.  
An opportunity to lobby for other issues.  
A political tool.  
A drain on their resources.  
A consideration that shorter term planning is more relevant than long-term planning.  
Raising their expectations about what the SMP can deliver.

#### **What's in it for us?**

An opportunity to influence long term sustainable coastal vision for North Norfolk.

An opportunity to make our decision-making more open and accountable.

An opportunity to demonstrate that we can take account of community and partnership visions.

An opportunity to decrease reliance on traditional defences.

The chance to implement 'Making Space for Water' approaches by including wider social and environmental benefits and planning engagement thoroughly.

An opportunity to engage with communities and help them to become involved in and to own the issues

An opportunity to demonstrate that our strategic overview role can be carried out practicably and sensitively with partners.

The chance to influence long-term planning issues in the coastal flood plain of The Wash

***Key local issues:***

- We had already engaged with communities, stakeholders and partners to differing degrees in the HECAG (Humber Estuary Coastal Authority Group) SMP that began in 2007, the North Norfolk SMP and the Norfolk SMP pilot. We were mindful of learning lessons from those plans and wished to build on the partnerships and relationships we had already established.
- We were already engaged with landowners over the withdrawal of maintenance policy elsewhere in the Anglian Region. We were mindful that this was a sensitive and contentious issue and treated all stakeholders with due care.
- Communities and stakeholders were aware of the difficulties in agreeing the adjacent North Norfolk SMP. This meant that many were already aware of the issues we faced but some may also have stronger political views.
- Climate change and sea level rise were not considered to be 'fact' by everyone and uncertainty was hard to explain.
- Relationships with some local authorities were believed to be strained given our recent adoption of the coastal strategic overview.
- Birds 'v' people issues.
- Independent groups were forming across the region to lobby for their interests.

***Key local opportunities:***

- We already had a good understanding of The Wash coast from the previous SMP and the Norfolk Coastal Habitat Management Plan. Significant information had been gathered through schemes, such as the managed realignment at Freiston Shore.
- Significant stakeholder engagement to date could form an advanced platform for further engagement if managed well.
- Alternative approaches to managing the coast had already been undertaken by various organisations with great success.
- Opportunities for wider environmental and social benefits had been demonstrated at existing managed re-alignment locations.
- Significant links with landowner and common rights holder groups existed.

- Interest for coastal-themed Interreg opportunities was mounting.
- GO-East was considering coastal matters more seriously.
- Independent groups were forming to take forward coastal activities.
- Good history of partnership working with other non-governmental organisations.
- Local politics were not rampant.

## B1.16.2 Questionnaires

### (i) *Copy of original questionnaire*

We produced a questionnaire in 2007 so that individuals and organisations could inform the CSG about the features and issues in The Wash SMP area that they most value. This questionnaire also asked for information about the person completing it, especially about how they wished to be kept informed of progress with the SMP. A copy of this questionnaire is below.

### **We want your views**

We need you to identify the issues that concern you about the future of the Wash estuary. This questionnaire is the first step in a wide ranging consultation, and by completing it you will help shape a review of the Shoreline Management Plan for The Wash estuary.

The responsibility for management of the coastal defences against erosion and flooding is shared between the Environment Agency, Local Authorities and some private landowners. The plan is the means by which these organisations determine the best way to look after the coast in a sustainable way for the next 100 years. It is prepared using guidelines set down by the Department for the Environment, Food and Rural Affairs (Defra) which is the Government Department having responsibility for setting national policy for defence of the coastline.

The plan identifies the main coastal processes – the tidal currents, wave action and movement of beach and seabed materials – that shape the coastline. Through consultation, the main issues relating to erosion and flood risk, and which affect local communities are set out. These are compared with what is known about the coastal processes, the economics of maintaining or providing new defences and the need to seek sustainable methods of managing the coast in the future.

It is likely that you will have an interest in the future management of the coast and it is for that reason that we would be grateful if you would complete the questionnaire below. This will provide us with background information and an early indication of which issues you would like to see being considered by the project team.

### **1. Tell us which aspects you think are most important for you and The Wash estuary. Pick and rank your top five from the list below or add your own.**

Rank on a scale from 1 to 5 (1 is the most important)

#### θ Access to recreation



**7. How would you like to be kept informed or involved in the future?**

Are you interested in:

**a) Being kept informed** Yes / No If yes, please indicate how:

By email  By letter/newsletter  By looking up on a website

Through local media (please name) \_\_\_\_\_

Another way (please say how) \_\_\_\_\_

**b) Giving views in the future** Yes / No If yes, please indicate how:

By filling in questionnaires/forms (similar to this one)  By writing in (mail or email)

Via the website  By being part of a formal group

By being represented by someone else on a group

Another way (please say how) \_\_\_\_\_

**Your contact details**

**Name** \_\_\_\_\_

**Organisation (if any)** \_\_\_\_\_

If you want to be kept informed in the future, please provide your contact details below and confirm that you are happy for us to hold this information in accordance with the Data Protection Act 1998.

I am happy for my details to be kept on the database by the Environment Agency in accordance with the Data Protection Act 1998, and understand that these will not be passed on to any other organisation

I would like to be kept informed as indicated above

**Address:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Email:** \_\_\_\_\_

**THANK YOU VERY MUCH!**

**Please post your completed form in the envelope provided.**



(ii) Summary of questionnaire responses

This sheet summarises feedback from the Wash SMP questionnaires returned by 1<sup>st</sup> November 2007.

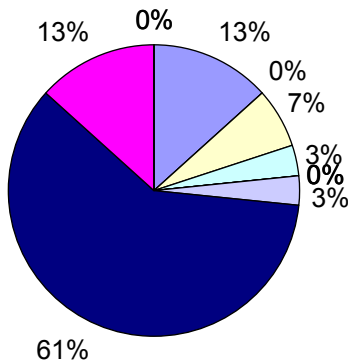
**Overall: The responses were very positive and most people gave extra feedback when invited to do so. People are largely aware of the wide range of issues and impacts that the SMP will consider and were keen to be involved in the process.**

**1. Who responded and what were their interests?**

In the first round we sent questionnaires to around **150 identified stakeholders**.

**47 completed questionnaires** were returned from planners, politicians, engineers, farmers, environmentalists and local residents of the Wash. Most of those who replied were aware of whether or not they live near to a coastal flood defence.

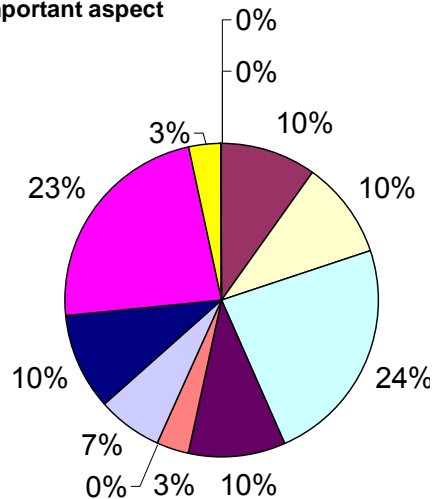
**1st most important aspect**



The vast majority of people (61%) felt that **flooding and erosion** was the most important aspect for themselves and The Wash estuary.

- Access to recreation
- Water quality
- Maritime industries e.g ports and harbours
- Maintaining fish/shellfish stocks
- Tourism and amenity usage
- Safeguarding the scenery
- Wildlife conservation
- Development and new houses
- Flooding and erosion
- Agriculture
- Other
- Blank

**2nd most important aspect**



**Agriculture** was the second most important. 13% chose it as 1<sup>st</sup> most important and 23% as 2<sup>nd</sup> most important

In addition to the aspects we'd suggested, respondents asked us to consider:

- Wildfowling
- maintaining natural sea/land boundaries i.e. no further reclamation
- MoD activities
- the impact of sea level rise, climate change and development on the historic environment

## **2. Views on flood risk**

Of the 93% of people who think sea level rise is an issue for the Wash estuary, **49% are 'very concerned'** about the possible effects of sea level rise and flooding.

## **3. Other issues that respondents were concerned about include:**

- Sediment movement and the ecological impacts of beach recharging. Realignment and coastal squeeze.
- The impact on wildlife and internationally significant sites/habitats/species.
- Flooding due to rivers, high tides, sea level rise and as a result of reduced maintenance of sea defences.
- Development in potential flood areas and insurance availability for domestic dwellings in future years.
- Increasing importance of good quality agricultural land for growing food.

## **4. Stakeholder engagement**

We asked people how they would like to be kept informed or involved in the future.

The responses were evenly split between suggested options of **email and newsletter**.

## **5. Views on the way in which the existing defences have had an impact on how the coastline has developed:**

### **General**

- None - they are necessary. Sea and river banks are essential, so that is the character of our coastline.
- The existing defences i.e. the sea flood banks are the coastline! They are the flood protection, without them the coastline would be very different.
- More money should be put into more defences.
- We've claimed too much land and, as sea levels rise, will need to look at retreating.

### **Natural processes**

- They have interfered with natural process of erosion and accretion. Certain defences have affected the coastline in other areas.

- Saltmarsh is an important part of the defence mechanism providing a "shock absorber" in front of the flood defences. The position of front line sea defences /flood banks is now exacerbating 'coastal squeeze' and has not allowed natural movement of saltmarsh landwards therefore loss of habitat.

### **Wildlife and environment**

- Significant land claim and defences have damaged the estuary's value for wildlife.
- Loss of saltmarsh and grazing marsh over centuries has led to decline in biodiversity. Saltmarsh accretion and loss have a major impact on wildfowling.

### **Development**

- The installation of defences themselves has allowed development.
- The existing defences have provided the protection and confidence required to develop the multi-million pound agricultural, industrial and tourism industries which in turn have necessitated the building of many rural and urban settlements. Maintenance and improvement of these defences is essential to ensure continued economic stability and growth.
- Concrete seawalls with promenade help tourism. The coastline would attract more economic development if the sea defences were improved.
- Developed over time to utilise land for production of crops. Reclamations of Grade 1 farmland has been and will continue to be vital for food production.

## **6. Views on the way forward & changes that should be made to the existing coastal defences:**

### **General**

- Deterioration of sea defences will lead to permanent damage from Skegness to King's Lynn and as far as Bedford, to all infrastructure, economy and livelihoods.
- Maintenance, strengthening & improvements are vital. Need to maintain in line with climate change predications. Second line of defence needed?
- More money should be put into more defences.
- Need to communicate the issues effectively.

### **Natural processes**

- Support natural methods. Improvements should be in line with sea level rise.
- Groynes constructed to prevent sand washing away.
- More ambitious schemes necessary to reverse past losses.
- Support the idea of more managed retreats where suitable.
- Improved river protection.

### **Wildlife and environment**

- Imperative to take account of long-term projection of rising sea-level, resultant erosion of frontal habitat and manage situation to allow space for habitat retreat and realise opportunities for nature conservation, access to tourism, aquaculture.

- Ambitious managed realignment schemes are necessary to maintain extent of habitat in face of sea level rise. Move some defences back to create wildlife habitat.
- Significant historic assets and landscapes should be taken into account.
- Source material for any defences locally. Add value to adjacent land e.g. through creation of saline lagoons in areas where materials sourced to build up defences.
- There is a need for more naturally functioning ecosystems and for a less abrupt transition between land-uses (e.g. buffer zone - perhaps saltmarsh?)
- Develop wildlife conservation & amenity so far as it is concomitant with sea defence. Try to retain some of the natural sandhills, nature areas, but concrete is necessary.

### **Development**

- Raise sea bank by 1m.
- The tidal river banks near the towns should be raised further to protect the increasing population e.g. Welland banks near Spalding.
- Continue sustainable defence activity where economic use of land is being made. Some form of managed retreat imperative in order to preserve large percentage of our most productive lands.

Access roads could be maintained better by Highways Department.

### *(iii) PDZ2 Stakeholder Event 24 August 2009 Feedback Questionnaire*

On 24 August 2009, a key stakeholder meeting was held with those residents and businesses likely to be directly affected with a change in management intent along their stretch of coastline (PDZ2: Snettisham to South Hunstanton) prior to the main public consultation. Further details regarding this meeting are provided in Section B3 Meetings with Stakeholders.

A questionnaire was produced to gauge their understanding of the sensitive issues affecting their coast, and the successfulness of the stakeholder meeting. A copy of this questionnaire is provided below.

## Tell us what you think, your views are important.

### **The Wash SMP Key Stakeholder Meeting Hunstanton Community Centre, 24<sup>th</sup> August 2009**

Thank you for taking the time to come along to today's event. We hope you have found it both informative and helpful.



**Q6.** Today you will have seen a PowerPoint presentation and been given a handout on the Wash SMP. Were these both clear and informative? If not, in what ways could we improve them?

**Q7.** This is the start of the consultation process. What else might be done to help others to take part?

**Q8.** Are there any further comments you would like to make?

Thank you for your feedback.

We may wish to get back in contact with you to discuss your comments further. If you are happy for us to contact you please leave your name and contact details below:

Name:

Contact details:

*(iv) Public Consultation Feedback Questionnaire*

A questionnaire was produced for the drop – in events organised during the public consultation period (12 October 2009 until 15 January, 2010). A copy of this questionnaire is provided below.

## Have a say in your coastline!

Tell us what you think, your views are important.

Thank you for taking the time to come along to today's event. We hope you have found it both informative and helpful.

We would appreciate you taking the time to fill out this short feedback form. Please take this opportunity to convey any further comments you wish to make on The Wash SMP. Thank you.

---

**Q1.** Please circle on the scale below, how much knowledge you had of The Wash SMP, **prior** to today's event?

<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
No knowledge					Very well informed

**Q2.** Please circle on the scale below, how much knowledge you had of The Wash SMP, **after** today's event?

<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
No knowledge					Very well informed

**Q3.** Please circle on the scale below, how much knowledge you had of the potential flood risk to your local area, **prior** to today's event?

<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
No knowledge					Very well informed

**Q4.** Please circle on the scale below, how much knowledge you had of the potential flood risk to your local area, **after** today's event?

<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
No knowledge					Very well informed

**Q5.** Where did you hear about the event?

**ABOUT YOU**

This information is in total confidence and is asked to help us better understand how different people or groups of people see the project. It will also be used to help us inform you of any progress if you have asked us to do this.

**Q6.** What is your main reason for your interest in The Wash SMP plan? Please tick relevant box.

- I represent groups or organisations that are involved (please specify)
- I am a landowner within the Shoreline Management Plan area
- I am a resident within the Shoreline Management Plan area
- I have a business within the Shoreline Management Plan area
- Other (please specify).....

**Q7.** Please tick the relevant boxes describing yourself.

**Age**    Under 16    Under 25    26-45    46-60    60+

**Q8.** Do you see yourself as a member of a specific ethnic group? If so, please state.

.....

**Q9.** What is the best way for us to keep in touch with you?

- Telephone    Tel.....
- Letter        Address:.....
- Email         .....
- Other         .....

**Q10.** Please use this space below to convey any further comments you would like to make on The Wash SMP, or any further questions we were not able to answer at the event?



(v) Summary of questionnaire responses

This sheet summarises feedback from the Wash SMP questionnaires returned by 20<sup>th</sup> November, 2010.

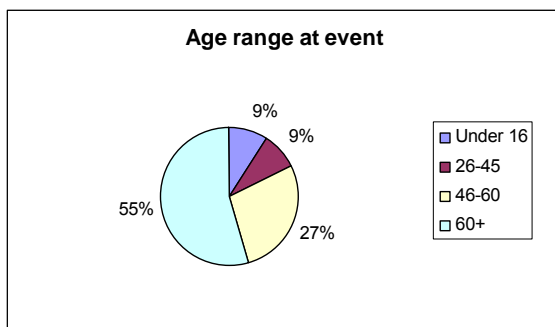
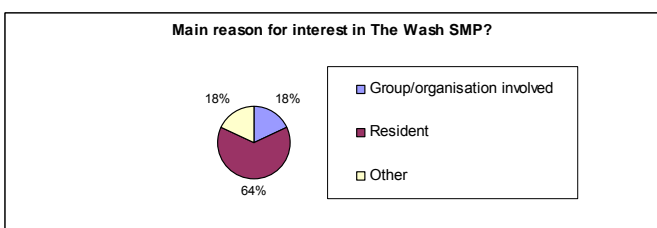
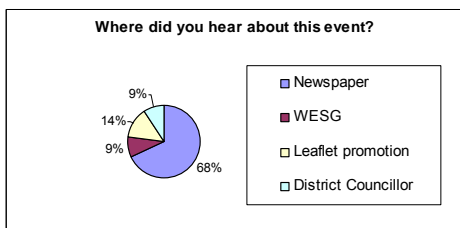
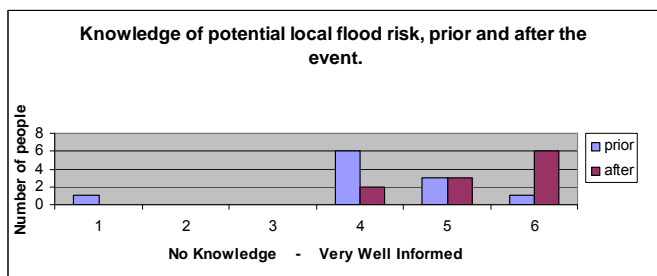
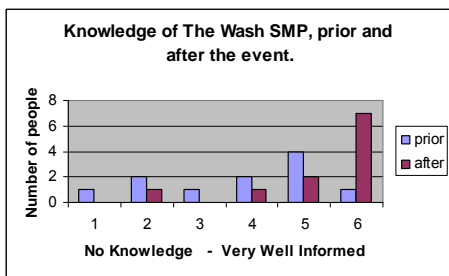
**Overall: The responses were very positive and most people gave extra feedback when invited to do so. People are largely aware of the wide range of issues and impacts that the SMP will consider and were keen to be involved in the process.**

**Who responded and what were their interests?**

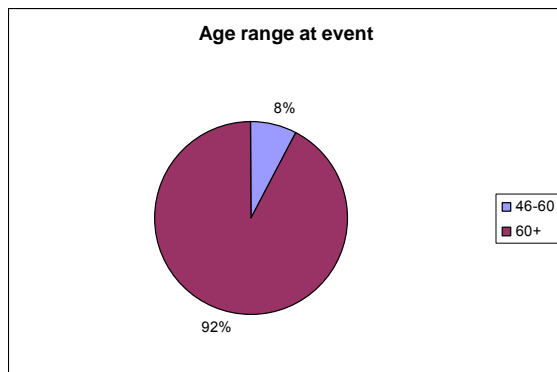
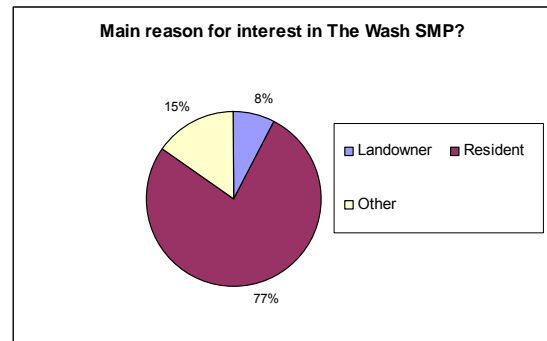
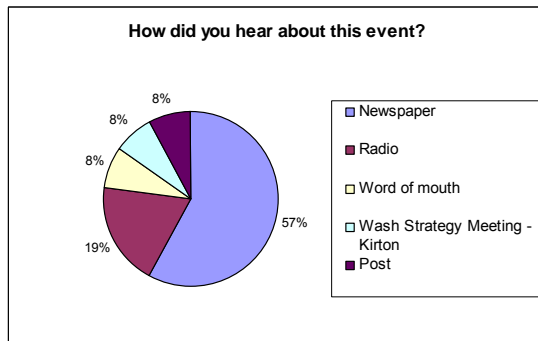
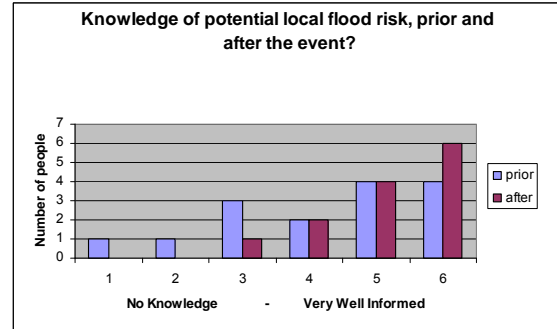
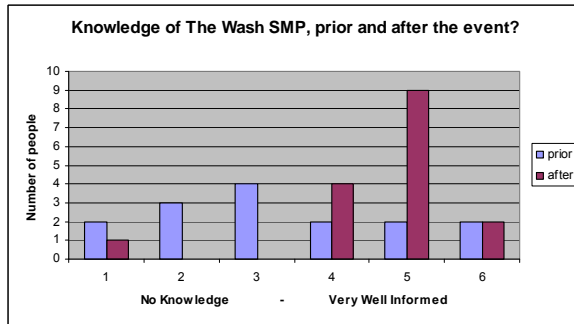
**83 completed questionnaires** were filled and returned from planners, politicians, engineers, farmers, environmentalists and local residents of the Wash during the consultation period. Most of those who replied were aware of The Wash SMP, whether or not they lived near to a coastal flood defence.

Below is the representation of the summary of questionnaire responses from the public consultation for The Wash SMP 2 that held from 12 October, 2009 until 15 January, 2010.

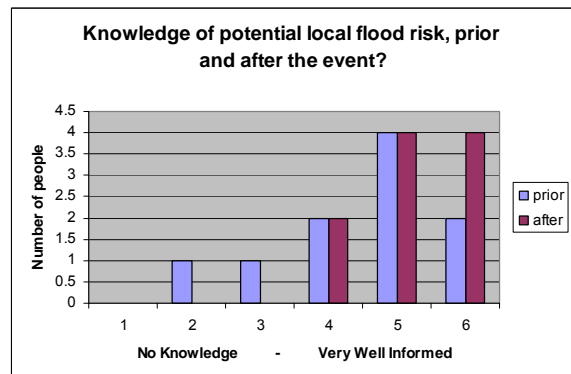
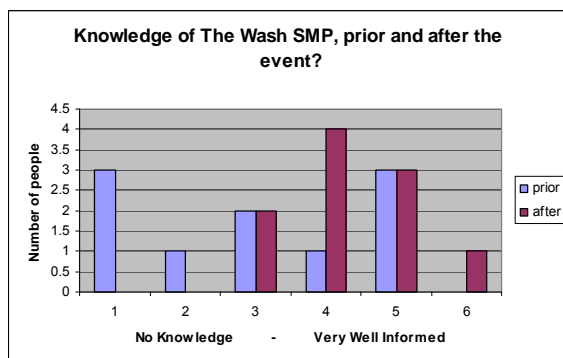
**Long Sutton**

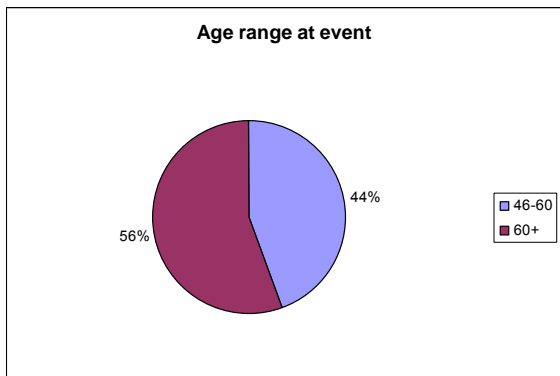
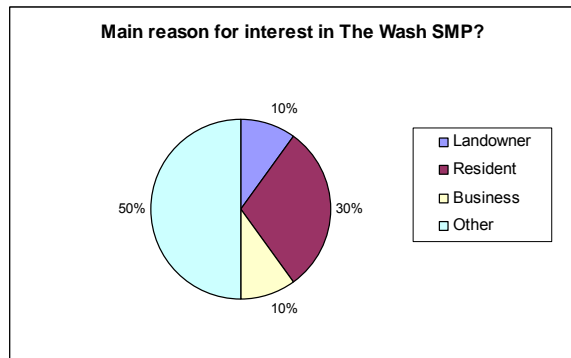
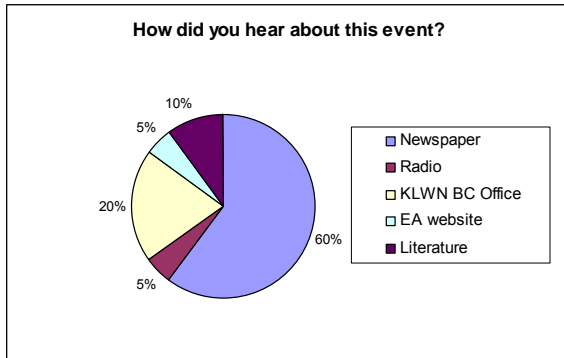


## Boston

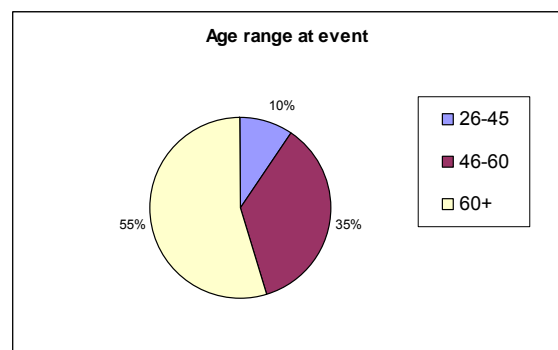
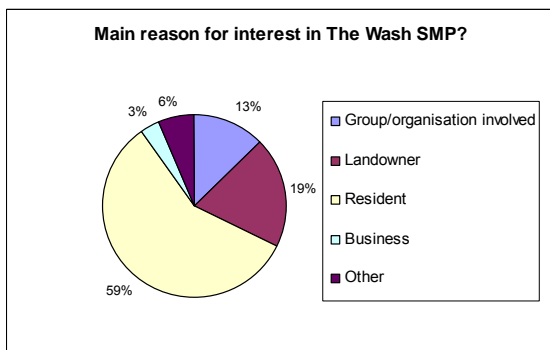
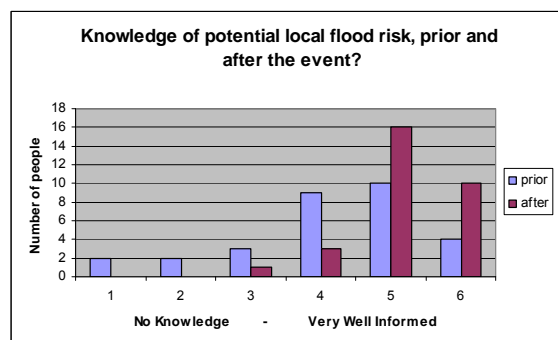
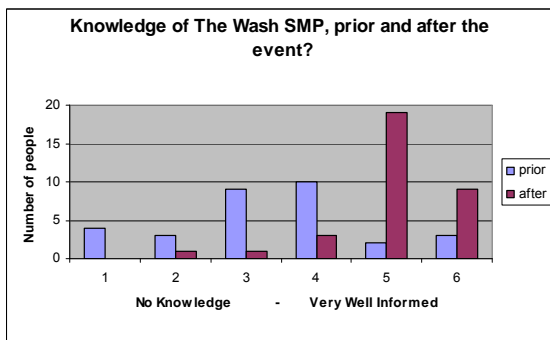


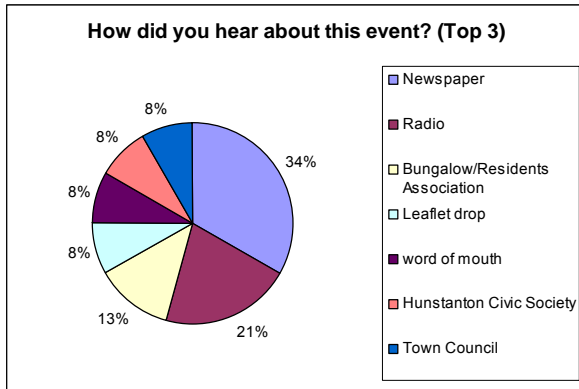
## Kings Lynn



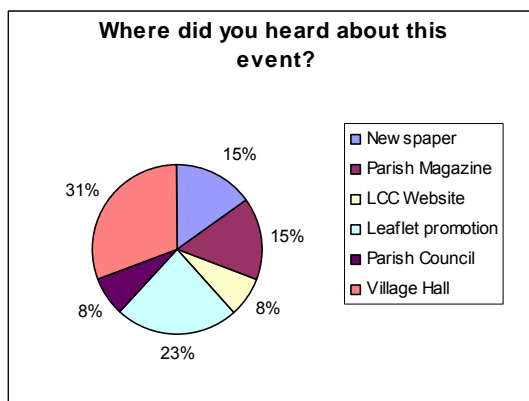
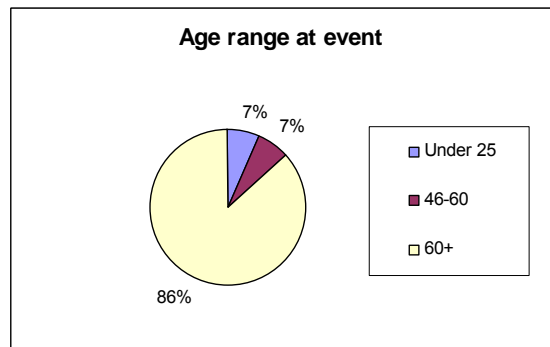
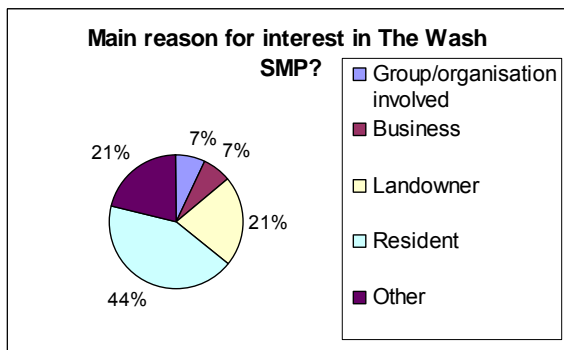
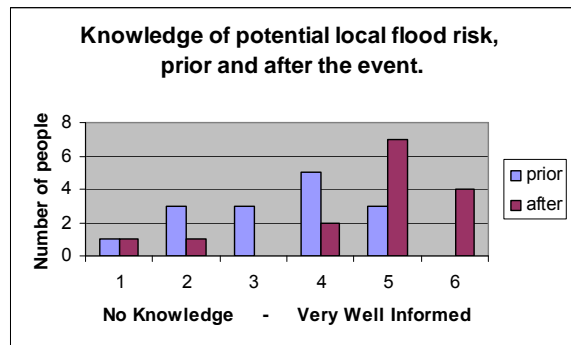
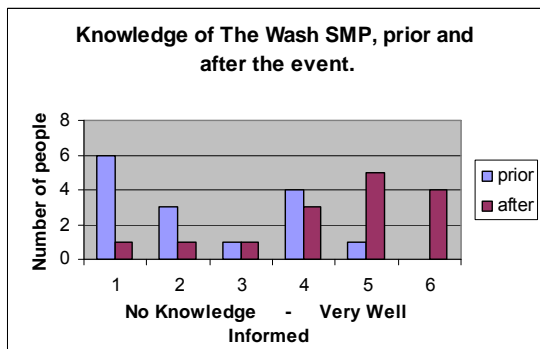


## Hunstanton

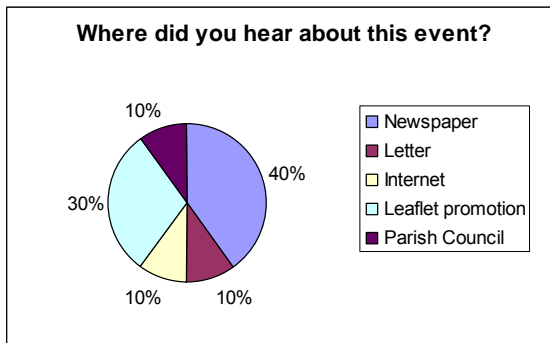
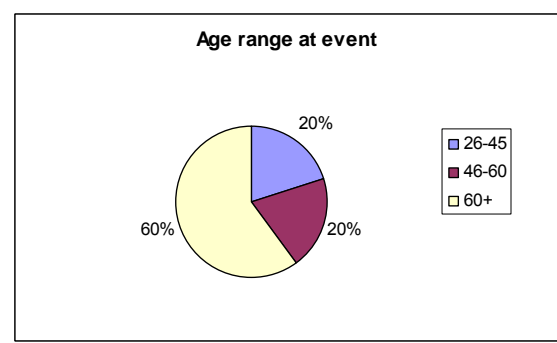
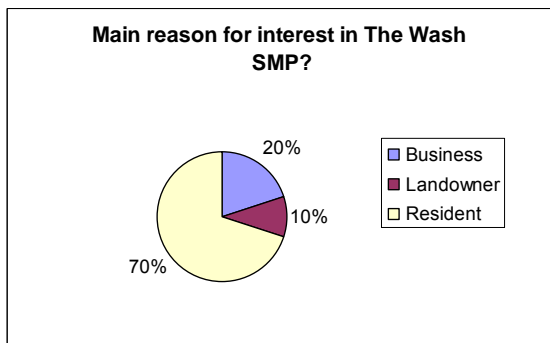
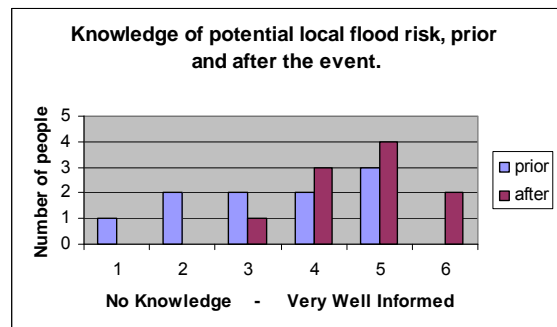
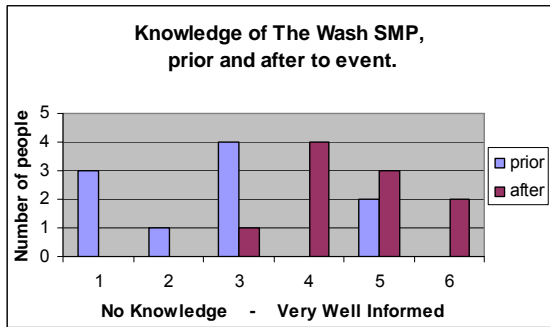




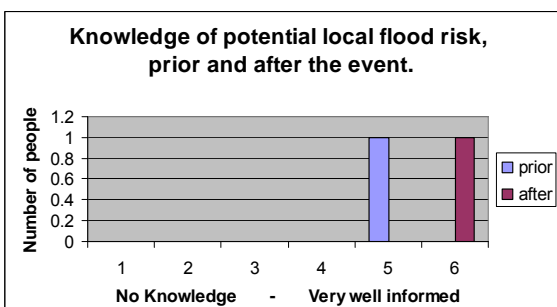
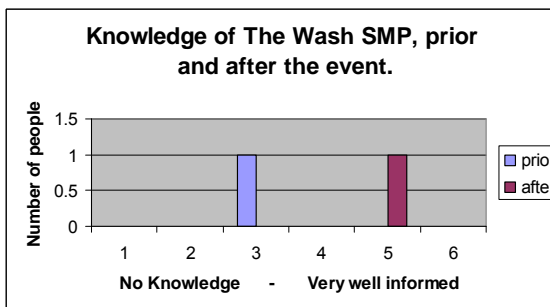
## Friskney

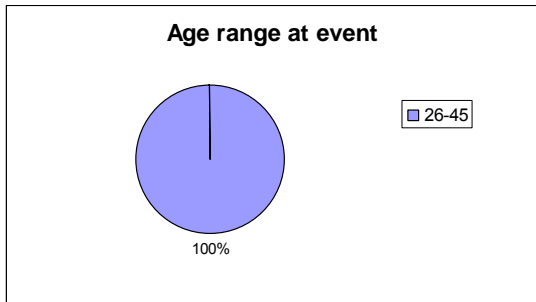
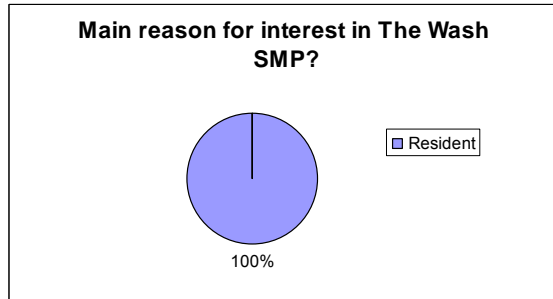
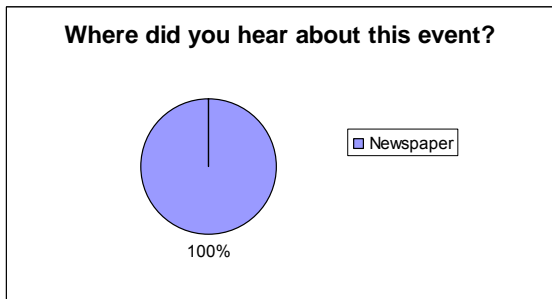


## Spalding

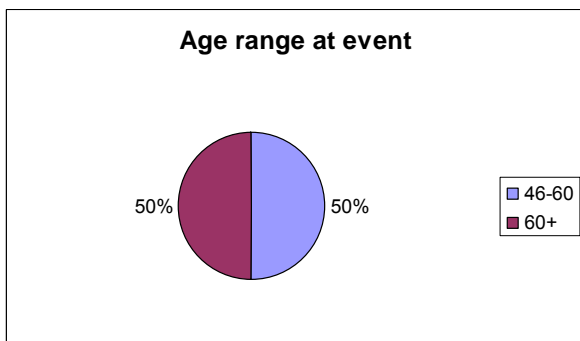
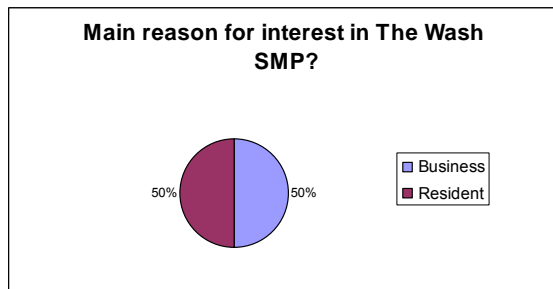
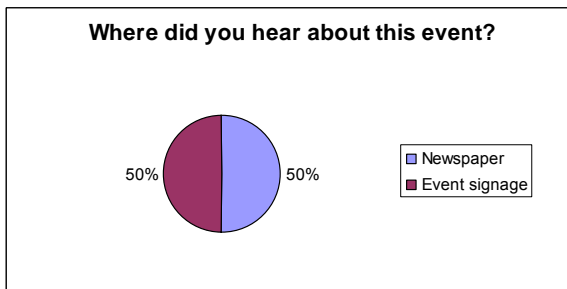
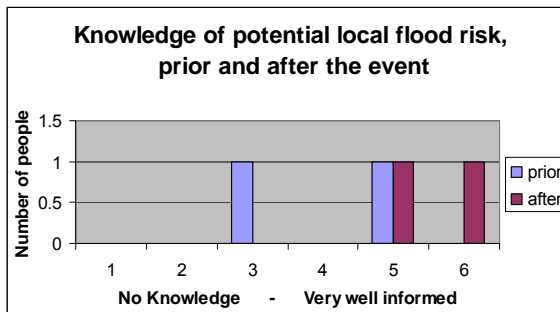
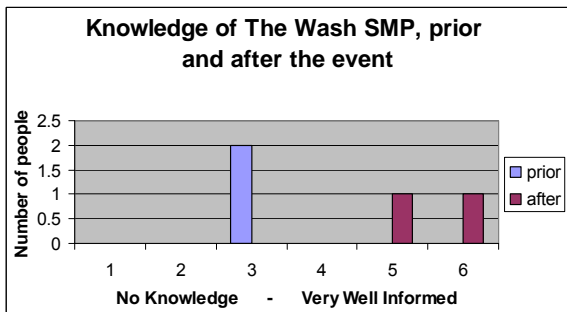


## Old Leake

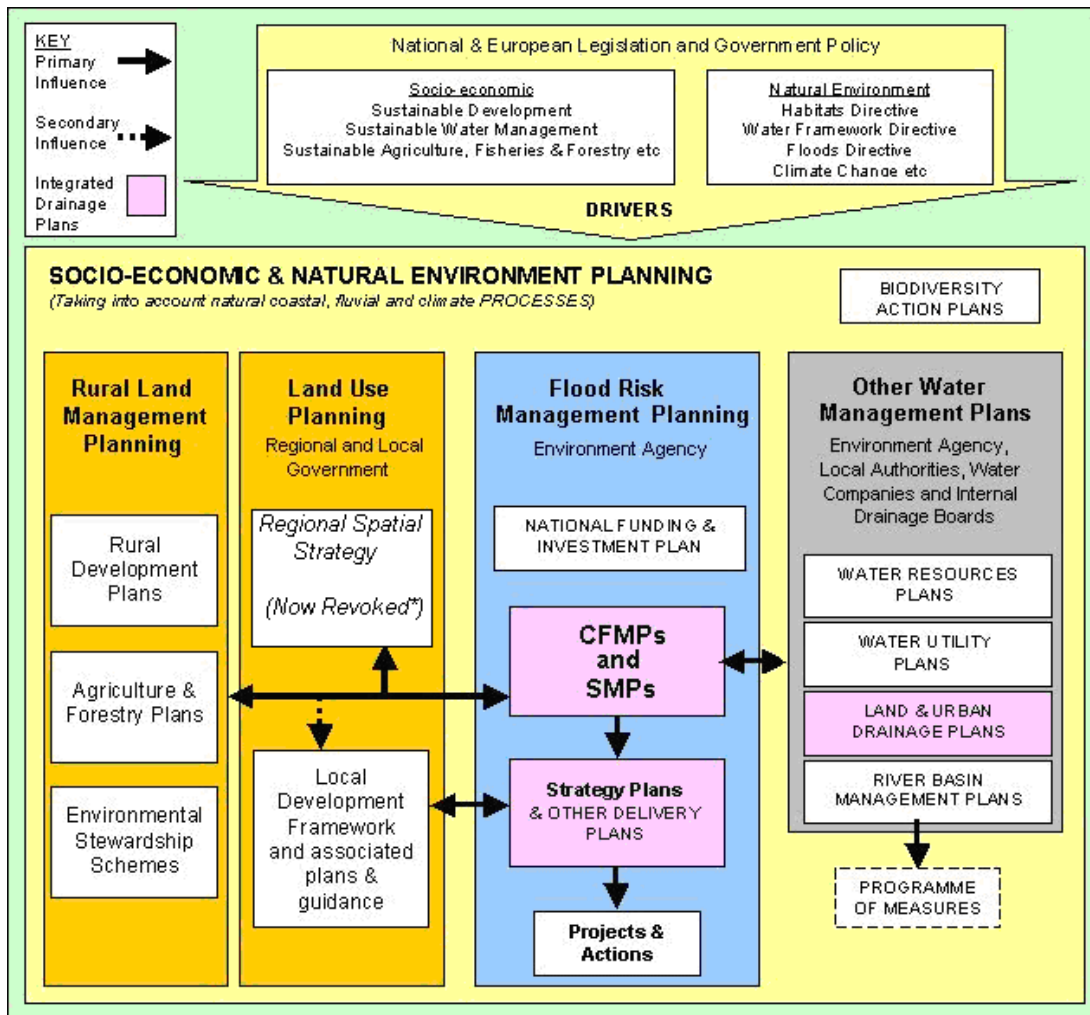




**Wainfleet**



### B1.16.3 The links between Flood and Coastal Risk Management planning and wider planning framework



\* While we developed this SMP within the context of the Regional Spatial Strategy, these have now been revoked. We recognise they are no longer valid and our direction and steer is replaced by local development plans.

Although the relationship between these plans can be complicated, they should influence and reinforce each other and provide frameworks for putting the SMP into practice. SMPs can support other coastal and estuary plans by providing information on the expected coastal changes, risks and the preferred approaches for managing the shoreline.

Working with and sharing information between coastal groups and local planning authorities is important to develop a co-ordinated approach to managing the shoreline.

Throughout the SMP process the CSG and EMF:

Influenced the regional planning process by:

- identifying the issues that need to be considered over an area wider than a single authority area

Kept the local planning authorities updated on shoreline management issues by:

- identifying areas at risk from flooding and coastal erosion
- predicting longer-term coastal change and the implications for planning and development
- working with the local planning authorities to identify suitable development plan policies for dealing with risk and shoreline management issues
- identifying the main shoreline management issues that have implications for planning how land is used in the plan area or in specific policy units.

Before considering planning applications in defined coastal areas:

- encouraged consultation between the relevant operating authority engineers and the local planning authority on individual planning applications.

As we develop River Basin Management Plans under the Water Framework Directive and produce improved flood and coastal erosion maps as part of the European Floods Directive, the key to delivering many of our planning and flood risk management aspirations is land management. This will in turn deliver social and environmental benefits.



#### B1.16.4 Stakeholder engagement programme for The Wash SMP

We have produced a detailed timetable for completing The Wash SMP. This lists all the tasks, who did them and when they were completed. The timetable was updated at regular intervals as tasks changed or moved.

The timetable attached is correct as at 26 March, 2010.

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
<b>Stage 1: SMP Scope</b>	Client Steering Group meeting	16 June 2006	-Explained SMP process  -Discussed management issues along the coastline  -Agreed CSG membership	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme, WLMA,WEMP	Meeting with presentations	Agenda and minutes, plus PAR for SMP production.
	Client Steering Group Meeting	17 August 2006	-Confirmed membership of CSG.  -Confirmed funding for SMP.  -Discussed MSFW project and links with SMP.	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme, WLMA,WEMP	Meeting with presentations	MSFW Strategic Overview on the Coast role.  Agenda plus minutes of previous meeting.

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
	Client Steering Group meeting	18 October 2006	<ul style="list-style-type: none"> <li>-Discussed membership of EMF.</li> <li>-Boundaries of Wash SMP.</li> <li>-Initial issues and features identification</li> <li>-Discussed format of first meeting with EMF</li> </ul>	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme, WLMA, WEMP	Meeting with papers	<p>Paper for use at Committee meetings for nomination of Elected Members.</p> <p>Agenda plus minutes.</p>
	Elected Members Forum	11 January 2007	<ul style="list-style-type: none"> <li>-Informed EMF that SMP is being reviewed and timetable for review.</li> <li>-Explained the role of the Operating Authorities.</li> <li>-Explained the background to the SMP, management policies and the stages of review.</li> <li>-Agreed on the roles and responsibilities for the EMF and the CSG.</li> </ul>	2 Member Representatives from each Operating Authority and also the County Councils.	Meeting with presentations	Handout of roles and responsibilities of CSG and EMF.

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
	Client Steering Group	15 March 2007	-Individual Authority Work Programmes and updates  -Update on progress of SMP. Data collection, coastal characterisation, appropriate assessment.  -Risk Workshop held in pm	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme.	Meeting with presentations  Risk Workshop	Agenda with minutes  Summary of Risk Workshop findings.
	Elected Members Forum	17 April 2007	-Update on progress of SMP: Data collection, coastal characterisation, appropriate assessment, outcomes of Risk Workshop.  -Presentation on Flood and Coastal Defence Powers and Legal issues	2 Member Representatives from each Operating Authority and also the County Councils.	Meeting with presentations	Agenda with minutes
	Client Steering Group	16 July 2007	-Individual Authority Work Programmes and updates  -Update on progress of SMP: Features and issues, appropriate assessment, RCZA work, data management tool and stakeholder involvement	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme.	Meeting with presentations	Agenda and minutes.

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
Stage 2	Elected Members Forum	8 November 2007	Updates on: -Progress of SMP: Flood risk, Theme Review, baseline scenarios, objectives and stakeholder engagement.  -Lincolnshire Coastal study	2 Member Representatives from each Operating Authority and also the County Councils.	Meeting with presentations	Agenda, supporting papers and minutes
	Client Steering Group	31 October 2007	-Individual Authority Work Programmes and updates  -Update on progress of SMP: Flood risk, Theme Review, RCZA outcomes, baseline scenarios, objectives and stakeholder engagement strategy.	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme	Meeting with presentations	Agenda, supporting papers and minutes
	Key Stakeholders Group meeting in collaboration with Wash Wide conference	August 2007	Feedback from questionnaires.	Key Stakeholders	Email / mailing	-Feedback from questionnaires and workshop.  -Invitation to awareness events

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
	Client Steering Group	22 January 2008	<p>Updates on:</p> <ul style="list-style-type: none"> <li>-Progress of SMP: Flood risk, Theme Review, objectives and stakeholder engagement strategy.</li> <li>-Individual Authority Work Programmes and updates</li> <li>-Lincolnshire Coastal Study.</li> </ul>	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme	Meeting with presentations	Agenda, supporting papers and minutes
	Elected Members Forum	7 February 2008	<p>Updates on:</p> <ul style="list-style-type: none"> <li>-Progress of SMP: Flood risk, Theme Review, objectives and stakeholder engagement strategy.</li> <li>-Lincolnshire Coastal Study.</li> </ul>	2 Member Representatives from each Operating Authority and also the County Councils.	Meetings with presentations	Agenda, supporting papers and minutes
	Public awareness event (King's Lynn)	4 March 2008	<ul style="list-style-type: none"> <li>-Raising public awareness of SMP process.</li> <li>-Informing the public of SMP timescale</li> <li>-Promotion and distribution of flood warning information</li> </ul>	EA area staff, officers and members from King's Lynn, Key Stakeholders Group, general public	Public Exhibition	Advertising flyer, targeted invitation to Key Stakeholders Group, SMP factsheet, flood warning information, Wash Estuary Strategy

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
			<p>-Gathering stakeholder opinion on exhibition materials, and contact information of previously unidentified stakeholders (i.e. homeowners)</p>			Group information
	Public awareness event (Boston)	5 March 2008	<p>-Raising public awareness of SMP process.</p> <p>-Informing the public of SMP timescale</p> <p>-Promotion and distribution of flood warning information</p> <p>-Gathering stakeholder opinion on exhibition materials, and contact information of previously unidentified stakeholders (i.e. homeowners)</p>	EA area staff, officers and members from Boston, Key Stakeholders Group, general public	Public Exhibition	Advertising flyer, targeted invitation to Key Stakeholders Group, SMP factsheet, flood warning information, Wash Estuary Strategy Group information

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
	Public awareness event (Wainfleet)	11 March 2008	<ul style="list-style-type: none"> <li>-Raising public awareness of SMP process.</li> <li>-Informing the public of SMP timescale</li> <li>-Promotion and distribution of flood warning information</li> <li>-Gathering stakeholder opinion on exhibition materials, and contact information of previously unidentified stakeholders (i.e. homeowners)</li> </ul>	EA area staff, officers and members from Lincolnshire, Key Stakeholders Group, general public	Public Exhibition	Advertising flyer, targeted invitation to Key Stakeholders Group, SMP factsheet, flood warning information, Wash Estuary Strategy Group information
	Public awareness event (Hunstanton)	12 March 2008	<ul style="list-style-type: none"> <li>-Raising public awareness of SMP process.</li> <li>-Informing the public of SMP timescale</li> <li>-Promotion and distribution of flood warning information</li> <li>-Gathering stakeholder opinion on exhibition materials, and contact information of previously</li> </ul>	EA area staff, officers and members from King's Lynn / Norfolk, Key Stakeholders Group, general public	Public Exhibition	Advertising flyer, targeted invitation to Key Stakeholders Group, SMP factsheet, flood warning information, Wash Estuary Strategy Group information

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
			unidentified stakeholders (i.e. homeowners)			
	Public awareness event (Long Sutton)	14 March 2008	<ul style="list-style-type: none"> <li>-Raising public awareness of SMP process.</li> <li>-Informing the public of SMP timescale</li> <li>-Promotion and distribution of flood warning information</li> <li>-Gathering stakeholder opinion on exhibition materials, and contact information of previously unidentified stakeholders (i.e. homeowners)</li> </ul>	EA area staff, officers and members from South Holland / Lincolnshire, Key Stakeholders Group, general public	Public Exhibition	Advertising flyer, targeted invitation to Key Stakeholders Group, SMP factsheet, flood warning information, Wash Estuary Strategy Group information
<b>Stage 3: Policy development</b>	Client Steering Group	14 May 2008	<ul style="list-style-type: none"> <li>Updates on:</li> <li>-Progress of SMP: Flood risk, Theme Review, baseline scenarios, objectives and defining the playing field.</li> <li>-Individual Authority Work Programmes and updates</li> <li>-Lincolnshire Coastal Study.</li> </ul>	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme	Meeting with presentations	Agenda, supporting papers and minutes



Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
			-Wash public consultation meetings review.			
	Elected Members Forum	4 June 2008	<p>Updates on:</p> <ul style="list-style-type: none"> <li>-Progress of SMP: Flood risk, Theme Review, baseline scenarios, objectives and defining the playing field.</li> <li>-Lincolnshire Coastal Study.</li> <li>-Wash public consultation meetings review.</li> </ul>	2 Member Representatives from each Operating Authority and also the County Councils.	Meeting with presentations	Agenda, supporting papers and minutes
	Client Steering Group	13 June 2008	<ul style="list-style-type: none"> <li>-Update on Progress of SMP</li> <li>-Discussion of the playing field and risk levels.</li> <li>-Presentation on the proposed method for appraisal</li> <li>-Lincolnshire coastal study</li> </ul>	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme	Meeting with presentations	Agenda, supporting papers and minutes

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
	Elected Members Forum	9 July 2008	<ul style="list-style-type: none"> <li>-Update on Progress of SMP</li> <li>-Discussion of the playing field and risk levels.</li> <li>- Presentation on the proposed method for appraisal</li> <li>-Lincolnshire coastal study</li> </ul>	2 Member Representatives from each Operating Authority and also the County Councils.	Meeting with presentations.	Agenda, minutes and presentation for meeting.
	Client Steering Group	17 September 2008	<p>CSG to be presented with findings on policy development and examination to enable:</p> <p>Further discussion on the appropriateness of the proposed draft policies</p> <ul style="list-style-type: none"> <li>-Policy packages' for appraisal agreed by CSG</li> <li>To agree amendments to proposed draft policies</li> <li>To resolve any areas of disagreement and conflict</li> <li>- Lincolnshire coastal study</li> </ul>	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme	Meeting with presentations.	<p>Minutes of meeting and draft policy statements.</p> <p>Briefing note sent out prior to meeting explaining the issues</p> <p>First draft of interim report.</p>

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
	Combined Elected Members Forum and Client Steering Group meeting	13 October 2008	EMF/CSG to be presented with findings on the policy development to enable:  Further discussion on the appropriateness of the proposed draft policies  To agree amendments to proposed draft policies  To resolve any areas of disagreement and conflict	1 representative from each operating authority, County Council, NE, RSPB, Wash and North Norfolk Coast European Marine Site Management Scheme  2 Member Representatives from each Operating Authority and also the County Councils.	Meeting with presentations	Minutes of meeting and draft policy statements.  Briefing note sent out prior to meeting explaining the issues  Interim report sent out prior to the meeting.  Stakeholder engagement strategy sent out prior to the meeting  Summary note sent out following meeting.
	Key Stakeholders Group	24 August 2009 onwards	KSG to be presented with findings on the policy development to enable:  Further discussion on the appropriateness of the proposed draft policies	KSG	Briefing note sent out prior to meeting explaining the issues  Summary note sent out	Minutes of meeting and draft policy statements.

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
			To resolve any areas of disagreement and conflict		following meeting.	
<b>Stage 4: Public Consultation</b>	Public Consultation	12 October 2009 – 15 January 2010	<p>Make stakeholders aware of draft plan.</p> <p>Provide stakeholders with opportunities for support and objection and moving to resolve differences</p>	Wider public	<p>Distribution of Summary pamphlet</p> <p>Drop in sessions</p> <p>Press/Media coverage</p> <p>Questionnaire</p>	<p>Main document</p> <p>Non – technical summary documents</p> <p>Fact sheets</p>
<b>Stage 5: Finalise SMP</b>	Agree revisions to draft SMP	4 February 2010	<p>Decide extent and effect of any changes and agree these.</p> <p>Prepare consultation report.</p> <p>Feedback to consultees.</p> <p>Prepare draft action plan to discuss and agree</p>	Consultant, Client Steering group,	<p>CSG to review draft consultation report.</p> <p>EA to respond to consultees and complete consultation register.</p> <p>CSG to review action plan.</p>	<p>Draft consultation report.</p> <p>Updated consultation register.</p> <p>Draft Action Plan</p>

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
	Agree revisions to draft SMP	26 March 2010	Decide extent and effect of any changes and agree these.	Consultant, Client Steering group, Elected Members' Forum	CSG/ EMF to review draft consultation report.	Draft consultation report.
	Finalise SMP		Review consultation report.		EA to respond to consultees and complete consultation register.	Updated consultation register.
			Review feedback to consultees.			Draft Action Plan
			Review and agree on draft action plan		CSG/EMF to review Action Plan	Draft final SMP report and appendices.
			Finalise documents according to SMP guidance.		CSG/EMF to review draft of final SMP.	

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
		May 2010 – October 2010	Adopt SMP	BCKL&WN, ELDC, NCC, BBC, SHDC, LCC, RFDCs	Adopt final SMP and Action Plans	Final SMP and Action Plan
<b>Stage 6: Dissemination</b>	All Groups	Autumn 2010	Make stakeholders and wider public aware of final plan	Client Steering Group, Elected Members' Forum	<p><b>Publish SMP</b> on website and arrange links from others' websites.</p> <p>Publish agreed publicity materials, including summary document.</p> <p>Organise public drop-ins by 30<sup>th</sup> November 2010 to <b>disseminate</b></p>	<p>SMP website updated with final SMP, appendices and summary document.</p> <p>Publicity materials published when SMP released.</p> <p>Post-adoption statement.</p> <p>Displays and publicity.</p>

Stage of Plan preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders Involved	Method of Involvement	Information Sent
					final SMP to all stakeholders	

## **Part 2 – Details of stakeholder engagement**

### **B2 Summary of Stakeholder Groups**

#### ***Client Steering Group (CSG)***

Had overall responsibility for delivering the SMP. The CSG started the process, undertook any scoping tasks needed, procured the technical expertise needed to complete the SMP, and managed its development and approval. The Environment Agency as lead authority was responsible for administering the project.

The roles and responsibilities of the CSG are shown in Section 1.11 of the stakeholder engagement strategy. The CSG was involved throughout the SMP process. It would also oversee the implementation of the SMP, with regular meetings continuing after completion. Membership of the CSG as at 26 March, 2010 is shown in Section 1.11 of the stakeholder engagement strategy.

#### ***Elected Members' Forum (EMF)***

Involving elected members in the SMP process reflects the “cabinet-style” approach to decision-making that many local authorities operate. Politicians were involved from the start of the project, so we could improve local planning authorities’ understanding of the SMP policies. Elected members were involved in developing the SMP to make it easier to approve and implement the final plan. The elected members came from all the partner organisations and the Environment Agency’s flood defence committee

The roles and responsibilities and membership of the EMF as at March 26, 2010 are listed in Section 1.11 of the stakeholder engagement strategy.

#### ***Key Stakeholder Group (KSG)***

Acted as a focal point for discussion and consultation throughout the development of the SMP. Membership of this group represented the main interests along the plan frontage, making sure that all interests were considered during the review. The KSG provided an extra means of obtaining feedback and information to the consultant and acted as a focal point for the consultation process.

The roles and responsibilities of the KSG are listed in Section 1.11 of the stakeholder engagement strategy. This appendix also contains a list of members of the KSG as at March 26, 2010. This list changed as the SMP process moved forward, as it became clearer which organisations and individuals would be affected by the SMP proposed draft policies.

#### ***Other stakeholders***

There are a number of other organisations and individuals who will be affected by the SMP policies and decisions. These stakeholders were contacted by the CSG



and some attended the drop-ins held in March 2008. They were also asked to comment on the draft SMP during the public consultation.

## **B3 Meetings with Stakeholders**

### ***Client Steering Group (CSG)***

Since the review of The Wash SMP started in 2006, there have been twenty meetings of the Client Steering Group. The following table is a record of who has attended each of these meetings.

**2006 - 2007**

Name	Organisation	2006			2007				
		16 <sup>th</sup> June	17 <sup>th</sup> Aug	18 <sup>th</sup> Oct	11 <sup>th</sup> Jan	15 <sup>th</sup> Mar	29 <sup>th</sup> May	16 <sup>th</sup> Jul	31 <sup>st</sup> Oct
Roy Lobley	Environment Agency (Chair)	-	-	-	√	X	√	√	√
Michelle Taylor	Environment Agency	-	-	-	-	-	-	-	-
Mark Robinson	Environment Agency	-	-	-	-	-	-	-	-
Nigel Woonton	Environment Agency	-	-	-	-	-	X	√	√
Duncan Campbell	Environment Agency (Technical Specialist)	-	-	-	-	-	-	√	√
Vicky Eade	Environment Agency (Technical Specialist)	√	√	√	√	√	√	-	-
Peter Doktor	Environment Agency	-	-	-	-	√	X	√	X
Marie Coleman	Environment Agency	-	-	-	-	-	-	-	-
Jaap Flikweert	Royal Haskoning	-	-	-	-	-	-	√	√
Victoria Clipsham	Royal Haskoning	-	-	-	-	-	-	-	√
Steve Williams	South Holland District Council	√	√	√	√	√	√	√	√
Peter Udy	Boston Borough Council	-	-	-	√	X	√	√	√
John Norton	Borough Council of King's Lynn and West Norfolk	-	-	-	√	√	√	X	√
Richard Belfield	Lincolnshire County Council	-	-	-	-	-	-	X	X
David Hickman	Lincolnshire County Council	-	-	-	-	-	-	-	-
John Jones	Norfolk County Council	-	-	-	-	√	√	X	X
Anne Shorland	East Lindsey District Council	-	-	-	-	-	-	-	-
Nick Tribe	Natural England	-	-	-	-	-	-	-	-
Rick Keymer	Natural England	-	-	-	-	-	-	-	-
Neil Pike	Natural England	X	√	√	√	X	X	X	X
Ian Butterfield	Natural England	-	-	-	-	-	-	-	-
Hugh Drake	National Farmers Union	-	-	-	-	-	-	-	-
Paul Tame	National Farmers Union	-	-	-	-	-	-	-	-
Jim Williams	English Heritage	-	-	-	-	-	-	-	-

**2006 - 2007**

Name	Organisation	2006			2007				
		16 <sup>th</sup> June	17 <sup>th</sup> Aug	18 <sup>th</sup> Oct	11 <sup>th</sup> Jan	15 <sup>th</sup> Mar	29 <sup>th</sup> May	16 <sup>th</sup> Jul	31 <sup>st</sup> Oct
Phillip Pearson	Royal Society for the Protection of Birds	-	-	-	-	-	-	-	-
Sarah Dawkins	Royal Society for the Protection of Birds	-	-	-	-	-	-	-	-
Peter Rushmer	Wash and North Norfolk Coast (EMS) Advisory Group	X	X	√	√	√	X	√	√
Brian Orde	Water Management Alliance	-	-	-	-	-	-	-	-

**2008 - 2010**

Name	Organisation	2008					2009					2010	
		22 <sup>nd</sup> Jan	14 <sup>th</sup> May	13 <sup>th</sup> Jun	17 <sup>th</sup> Sep	13 <sup>th</sup> Oct	6 <sup>th</sup> Feb	20 <sup>th</sup> Apr	25 <sup>th</sup> Jun	31 <sup>st</sup> Jul	13 <sup>th</sup> Nov	4 <sup>th</sup> Feb	26 <sup>th</sup> Mar
Roy Lobley	Environment Agency (Chair)	√	√	X	-	-	-	-	-	-	-	-	-
Michelle Taylor	Environment Agency	-	-	-	-	-	-	-	√	√	-	-	-
Mike Dugher	Environment Agency										√	X	X
Mark Robinson	Environment Agency	-	-	-	-	-	-	√	√	√	X	√	√
Nigel Woonton	Environment Agency	√	√	X	√	X	√	√	√	√	√	√	X
Neil Pope	Environment Agency	-	-	-	-	-	-	-	-	-	√	-	-
Onoriode Iboje	Environment Agency										√	√	√
Duncan Campbell	Environment Agency (Technical Specialist)	√	√	√	√	√	√	√	√	X	X	X	X
Peter Doktor	Environment Agency	X	X	√	X	X	√	√	√	X	-	-	-
Marie Coleman	Environment Agency	-	-	-	√	√	√	√	√	√	√	√	√
Jaap Flikweert	Royal Haskoning	√	√	√	√	√	√	√	√	X	√	√	√
Victoria Clipsham (nee Posey)	Royal Haskoning	X	√	√	√	√	√	X	√	√	√	√	√
Mat Cork	Royal Haskoning	√	√	X	X	X	√	√	X	√	√	√	X
Steve Williams	South Holland District Council	√	√	√	√	X	√	√	√	√	√	√	X
Peter Udy	Boston Borough Council	√	X	√	X	√	√	√	√	X	√	√	√
John Norton	Borough Council of King's Lynn and West Norfolk	√	√	√	√	X	√	X	√	√	X	X	X
Richard Belfield	Lincolnshire County Council	√	√	X	√	X	X	√	X	X	X	X	X

2008 - 2010

Name	Organisation	2008					2009					2010	
		22 <sup>nd</sup> Jan	14 <sup>th</sup> May	13 <sup>th</sup> Jun	17 <sup>th</sup> Sep	13 <sup>th</sup> Oct	6 <sup>th</sup> Feb	20 <sup>th</sup> Apr	25 <sup>th</sup> Jun	31 <sup>st</sup> Jul	13 <sup>th</sup> Nov	4 <sup>th</sup> Feb	26 <sup>th</sup> Mar
David Hickman	Lincolnshire County Council	-	-	-	-	X	X	√	√	√	√	√	√
Anne Shoreland	East Lindsey District Council	-	-	-	-	X	X	√	√	√	√	√	√
John Jones	Norfolk County Council	X	X	X	√	X	X	√	X	X	X	X	√
Nick Tribe	Natural England	-	-	-	-	√	√	√	√	√	X	√	√
Neil Pike	Natural England	√	X	X	√	-	-	-	-	-	-	-	-
Rick Keymer	Natural England	-	-	-	-	-	-	-	√	√	√	X	X
Ian Butterfield	Natural England	-	-	-	-	-	√	√	√	X	√	√	√
Hugh Drake	National Farmers Union	-	√	√	√	√	√	√	X	√	X	√	X
Paul Tame	National Farmers Union	-	√	√	√	√	X	√	X	√	√	√	√
Jim Williams	English Heritage	X	X	X	X	X	X	X	X	X	X	√	X
Tammy Smalley	Wash Estuary Management Plan Officer	√	X	X	√	√	√	X	X	√	-	-	-
Phillip Pearson	Royal Society for the Protection of Birds	-	-	-	-	-	-	-	√	X	-	-	-
Sarah Dawkins	Royal Society for the Protection of Birds	√	√	√	√	√	√	√	-	-	-	-	-
Peter Rushmer	Wash and North Norfolk Coast (EMS) Advisory Group	√	X	X	X	√	X	√	X	X	√	X	√
Brian Orde	Water Management Alliance	-	-	-	-	-	-	-	-	√	√	√	√
John Sharpe	Royal Society for the Protection of Birds	-	-	-	-	-	-	-	-	-	√	-	X
Amy Crossley	Royal Society for the Protection of Birds	-	-	-	-	-	-	-	-	-	√	X	X
Ellie Bendell	Environment Agency (NEAS)	-	-	-	-	-	-	-	-	-	X	X	X
Will Fletcher	English Heritage	-	-	-	-	-	-	-	-	-	X	√	X
Andy Piper	Borough Council of King's Lynn and West Norfolk	-	-	-	-	-	-	-	-	-	X	√	X
Peter Jermany	Borough Council of King's Lynn and West Norfolk	-	-	-	-	-	-	-	-	-	√	√	√
Nick Dunnett	Wash Estuary Strategy Group	-	-	-	-	-	-	-	-	-	-	-	√
Nicky Williams	Atkins Consultant ( Lincolnshire Coastal Study)	-	-	-	-	-	-	-	-	-	-	-	√

In addition to these regular meetings of the CSG, we have held three meetings to discuss communications and engaging with external organisations. The table below is a record of who has attended these meetings:

### **Communications contacts**

<b>Name</b>	<b>Organisation</b>
Sue Lawson	Boston Borough Council
Sharon Clifton	Kings Lynn and West Norfolk
Linzee Kottman	Natural England
Melissa Gill	Natural England
Janet Marshall	Lincolnshire County Council
Rachael Hill	Lincolnshire County Council
James Gilbert	East Lindsey District Council
Peter Rushmer	Wash And North Norfolk Coast (EMS) Advisory Group
Sharon Dabell	South Holland District Council
Jim Williams	English Heritage
Tammy Smalley	Wash Estuary Strategy Group
John Birchall	Norfolk County Council

### ***Elected Members' Forum (EMF)***

Each partner organisation was able to nominate up to two members to sit on the EMF for The Wash SMP, the first meeting of which was held on 11th January 2007.

There have been a total of twelve EMF meetings since 2007. The table below is a record of who has attended each of these meetings.

2007 - 2010

Name	Organisation	2007				2008				2009					2010
		11 <sup>th</sup> Jan	17 <sup>th</sup> April	26 <sup>th</sup> Jun	8 <sup>th</sup> Nov	7 <sup>th</sup> Feb	4 <sup>th</sup> June	9 <sup>th</sup> July	13 <sup>th</sup> Oct	13 <sup>th</sup> Mar	6 <sup>th</sup> May	25 <sup>th</sup> Jun	31 <sup>st</sup> July	13 <sup>th</sup> Nov	26 <sup>th</sup> Mar
Mike Dugher (Chair)	Environment Agency	-	-	-	-	-	-	-	-	√	√	√	X	√	√
Michelle Taylor	Environment Agency	-	-	-	-	-	-	-	-	-	-	√	√	-	-
Mark Robinson	Environment Agency( Coastal Advisor For Lincolnshire)	-	-	-	-	-	-	-	-	-	-	√	√	X	√
Nigel Woonton	Environment Agency	-	-	-	√	√	√	√	-	√	√	√	√	√	X
Peta Denham	Environment Agency( Flood & Coastal Risk Manager)	-	-	-	-	-	-	√	-	X	X	√	X	X	√
Andy Baxendale	Environment Agency ( Northern Area Manager)	-	-	-	-	√	-	√	X	√	√	X	X	X	X
Marie Coleman	Environment Agency	-	-	-	-	-	-	√	√	√	√	√	√	√	√
Jaap Flikweert	Royal Haskoning	-	√	√	√	√	√	√	√	√	√	√	X	√	√
Victoria Clipsham	Royal Haskoning	-	-	-	√	√	√	√	√	-	√	√	√	√	√
Mat Cork	Royal Haskoning ( Environmental Specialist)	-	-	-	√	√	-	-	-	√	√	X	√	√	X
Cllr. Brian Long	Borough Council of King's Lynn & West Norfolk	√	√	√	√	√	√	√	√	√	√	√	X	√	√
Cllr. Rod Payn	Borough Council of King's Lynn & West Norfolk	-	-	-	X	√	√	√	√	√	√	√	√	√	X
Cllr. Alison Austin	Boston Borough Council	-	-	-	√	√	√	√	√	√	√	√	√	√	√
Cllr. Richard Leggott	Boston Borough Council	-	-	-	X	-	X	X	√	√	√	√	√	√	X
Cllr. Tony Wright	Norfolk County Council	√	√	√	√	√	X	√	X	√	√	√	√	√	X
Cllr. Eddy Poll	Lincolnshire County Council	-	-	-	X	-	√	X	√	√	√	√	√	√	√

**2007 - 2010**

Name	Organisation	2007				2008				2009					2010
		11 <sup>th</sup> Jan	17 <sup>th</sup> April	26 <sup>th</sup> Jun	8 <sup>th</sup> Nov	7 <sup>th</sup> Feb	4 <sup>th</sup> June	9 <sup>th</sup> July	13 <sup>th</sup> Oct	13 <sup>th</sup> Mar	6 <sup>th</sup> May	25 <sup>th</sup> Jun	31 <sup>st</sup> July	13 <sup>th</sup> Nov	26 <sup>th</sup> Mar
Cllr Steve F Williams	South Holland District Council	-	-	√	√	√	√	X	X	√	√	√	X	X	X
Cllr. Paul Espin	South Holland District Council	√	√	-	X	√	√	√	√	√	√	√	√	√	√
Steve Williams	South Holland District Council	√	√	√	√	√	√	√	X	√	√	√	√	√	X
Cllr. Brian Burdett	East Lindsey District Council	-	-	-	X	-	√	-	-	-	-	-	-	-	-
Bud Shields	Regional Flood Defence Committee	-	√	√	√	√	√	X	√	√	X	√	√	√	√
Steve Wheatley	Regional Flood Defence Committee	-	-	-	-	-	-	-	-	-	-	-	√	√	√
Ben Hornigold	Regional Flood Defence Committee	X	√	√	-	-	-	-	-	-	-	-	-	-	-
Cllr Colin Davie	Lincolnshire County Council	-	-	-	-	-	-	-	-	-	-	-	√	-	-



## **Key Stakeholder meetings**

During the course of reviewing The Wash SMP, we held several meetings with stakeholders. These meetings were a mixture of collaborative events and also smaller scale meetings with local organisations and businesses. Outlined below are the events that have been held so far.

### **a) Key Stakeholder Event for The Wash SMP (Thursday 29<sup>th</sup> November 2006)**

Wash Wide Annual Conference at Whaplode Manor, near Saracen's Head, Lincolnshire

In collaboration with the Wash Wide conference in 2006, the SMP held a workshop in the afternoon session of the conference. All key stakeholders were invited to this event and the stakeholders were engaged in the form of a workshop. The purpose of this meeting was to introduce the main organisations with an interest in The Wash coast to the SMP review process, and to let them know how they could become involved. We also wanted to make sure that we had invited the right organisations and individuals to this meeting and to check that we had the right contact details.

Objectives for the event were:

- To inform others about our FRM activities around The Wash and the forthcoming review of the SMP.
- To gather views from the participants to inform the SMP process.
- To involve participants, giving them an opportunity for discussion about the issues for FRM in and around The Wash.

There were 150 attendees.

Purpose of the workshop

- Help us to start to prepare for the work to produce The Wash SMP
- To understand who may be interested in this work
- To start to understand what sorts of things we need to think about in The Wash SMP

We asked the KSG to identify people that are relevant to The Wash and then to place them on a scale relative to what they thought:

- a. Their level of interest in The Wash SMP
- b. The level of impact The Wash SMP could have on them
- c. Their level of influence on The Wash SMP

Information gathered at the event was collated and used to target leaflets and questionnaires.

### Organisations involved in Wash Wide conference 2006

Borough Council of Kings Lynn and West Norfolk	Lincolnshire Police and Wildlife Liaison Officer
Boston and District Archaeological Society	Lincolnshire Tourism
Boston Borough Council	Lincolnshire Wildlife Trust
British Association for Shooting and Conservation	Maritime Leisure
Cambridgeshire County and Fenland District Council	Mayor of Hunstanton
Centre for Rural Economy, Newcastle University	National Farmers Union
Chair of the EMS Kings Lynn and West Norfolk Advisory Group	Natural England
East Lindsey District Council	NFU and 4th IDB and WESG
East Rudham Parish Council	Norfolk Association Parish and Town Councils
Eastern Sea Fisheries Joint Committee	Norfolk Coast Partnership
English Heritage	Norfolk County Council
Environment Agency	Norfolk Resident
Federation of Small Businesses	Norfolk Wildlife Trust
Fenland District Council	North Norfolk County Council
Fenland Wildflowers' Association	Port of Boston Ltd
Fens Tourism Ltd	RAF Wainfleet
Freiston Parish Council	Ramblers' Association
Green Quay	RSPB
Green Quay and Kings Lynn IDB	Scolt Head and District Common Rightholders' Association
Groundwork Lincolnshire	Sneaths Mill Trust
H. Waltham and Co.	Society for Lincolnshire History and Archaeology
Heritage Trust for Lincolnshire	South Holland District Council
HM Coastguard	South Holland Ramblers Association
Holme Parish Council	Stradsett Estate Farms
Hungarian Partner of WESG	Sutton Bridge Resident
Hunstanton Civic Society	Terrington St Clements Parish Council
J. E. Piccaver and Co	The Wash N. Norfolk European Marine Site
Jack Buck farms	The Wash NNR, Natural England
Job Centre Plus Lincolnshire and Rutland	Tydd St Mary Parish Council
Lincolnshire County Council	University of Lincoln
Lincolnshire Wildlife Trust	Vine House Farm
Lincolnshire Badger Group	Wash Estuary Strategy Group
Lincolnshire Biodiversity Partnership	Welland and Deepings IDB
Lincolnshire County Council	Wiggenhall St Germans Parish Council
Lincolnshire Tourism	Wyberton Parish Council and Parker Yachts
Lincolnshire Fenland Leader+	

## **b) 24<sup>th</sup> August 2009. Meeting with Stakeholders in PDZ2 (Wolferton Creek to South Hunstanton)**

A letter was sent to the key stakeholders in PDZ2 to invite them to a stakeholder meeting that took place on Monday 24<sup>th</sup> August 2009. A copy of this letter appears below.



**3 August 2009**

### **An invitation to have your say**

#### **Preview of The Wash Shoreline Management Plan (SMP) Wolferton Creek to South Hunstanton: key stakeholder meeting**

We are writing on behalf of The Wash SMP partnership to invite you to attend a preview meeting on Monday 24 August. This will take place at the Borough Council offices, Valentine Road, Hunstanton PE36 5EF. The meeting will commence at 9.30am for a 10am start and finish with lunch at 1pm.

A Shoreline Management Plan is a policy document in which the organisations that manage the shoreline set out their long term plans. The SMP aims to identify the best ways to manage flood and erosion risk to people and the developed, historic and natural environment.

The purpose of this key stakeholder meeting is to provide you, an interested party in the coastline between Wolferton Creek and South Hunstanton, with an opportunity to:

- review the process used to identify possible policy options for the management of this coastline;
- examine the proposed draft policies;
- ask questions of the experts;
- learn how you can get involved in the SMP consultation process.

The meeting also provides the SMP partnership with an opportunity to explain the issues raised in the SMP and to encourage an open discussion to determine the way forward.

The Wash SMP document is expected to go to public consultation for three months this autumn, providing an opportunity for comment on the proposed draft management policies for The Wash coastline.

Your views are important to us and we very much hope that you can join us. As lunch will be provided, we would appreciate confirmation of attendance either by email to [michelle.taylor@environment-agency.gov.uk](mailto:michelle.taylor@environment-agency.gov.uk) or by telephoning 01733 464475 by 12 August please. If you are unable to join us on the day, we would encourage you to send a representative in your place. However, if you are unable to send a representative, you will still have a chance to comment on the SMP, and your feedback will be welcomed during the official consultation period during which a number of local road shows will be held.

We look forward to welcoming you on 24 August 2009. In the meantime, if you have any questions or comments about The Wash Shoreline Management Plan, please e-mail [washsmp@environment-agency.gov.uk](mailto:washsmp@environment-agency.gov.uk)

Yours sincerely



**Cllr Brian Long (Chair)**  
**Borough Council of King's Lynn**  
**& West Norfolk**



**Geoff Brighty (Area Manager)**  
**Environment Agency**

Key Invitees included local businesses such as caravan site owners, amusement arcades, shops and water sport shops / clubs. Representatives from South Beach property owners association and North Beach bungalow owners association were also invited to represent individual residents. Key staff from local parish councils (Hunstanton, Heacham and Snettisham), Borough Council of King's Lynn and West Norfolk, and Norfolk County Council were invited, including environment portfolio holders and emergency planners.

During this meeting, a presentation to the stakeholders on flood risk and its management was given jointly by the Environment Agency and Borough Council of King's Lynn and West Norfolk, followed by a breakout session to discuss the information presented. The questions posed to the breakout groups are recorded below, along with a summary of stakeholder comments.

### Question 1

**Having listened to the presentations this morning; are there any other issues or impacts that we should be aware of for consideration in the SMP? (15 minutes)**

Stakeholder Comments:

- Is there any intention to change the soft defence?
- Wash barrier? Is this being considered?
- Need to be positive and proactive.
- 'PEN' (Preliminary Evacuation Notice) procedures are likely to be needed more often and over greater area
- Cost benefits; work with communities
- Emergency planning – some areas are more vulnerable than others but the impacts affect the whole area
- Tourism is based on 'being beside the sea' – not half a mile inland.
- Holiday makers travel some distance on a regular basis throughout the year to the coast.
- Need to highlight the Importance of the foreshore in protecting hard defences
- The shingle ridge is currently a sub standard defence – it is not as good as new defences, being built elsewhere (1:50 locally)
- Beach recharge is a technically difficult process – only certain sections are recharged.
- Impact of moving sites inland on the community/environment there.
- What would happen to properties and caravan parks that are behind the shingle bank if there was a 'no active intervention' policy? – Would residents be able to fund the defences themselves?
- Will maintaining the defence alter the environment that the local community/holiday makers value? Would it therefore be better to move back?
- What compensation would be available? Such as a land swap scheme.
- There is an issue of flooding coming round the bank from weaknesses elsewhere – would cross walls be a way forward? (Defra adaptation scheme, local pathfinder scheme).
- Shoreline planning, land use planning and community planning need to be better linked.
- The seven month occupancy of the caravans could be reviewed, if the defences were maintained.
- How much modelling has been done on realignment?
- If there is a specific storm then what will happen then? What will happen with regards to repair and maintenance?
- Is this area at serious risk? – We have to plan and prepare
- Residential homes are viewed as more important by the government than holiday homes.

- Public money, therefore cost benefits would have a serious impact and need planning for the way forward.
- Need to work together with communities.
- Moving to second line of defence. This would still have evacuation issues.

### Question 2

**What are your initial thoughts on how we should prepare for 2025 and beyond? (15 minutes)**

- Funding is the main issue
- General view is that contributions' would be forthcoming – no brainier 'not to hold the line'
- Tourist industry would be lost if the line is not held
- Would a shared funding commitment improve the chances of securing government funding?
- Rate freeze and surcharges for defences
- Strong financial case could be made. The figures should be collated as evidence for this
- Hold the line to 2105.
- Make it a political issue? (Henry Bellingham MP)
- Caravan owners would like a clear strong message in the plan.
- Strong economic and well-being argument here.
- Clear policy is needed
- Funding –Some businesses may leave if cost is too high, leaving the remaining businesses with even higher costs.
- Planning for relocation in the long term?
- Planning/occupation consents, a consistent standard is needed
- Social impact – vulnerable individuals and businesses can not afford to leave.
- Planning constraints in the area. Flood risk maps and AONB constraints can makes moving back difficult therefore need to start finding land where this can happen in the next few years. Need to present these options very carefully to existing communities.
- Staged approach needed to moving numbers of caravans/holiday homes.
- PPS20 – local authorities will need to identify where development needs to be constrained due to flood risk.
- Need analysis of different types of homes eg caravans/ fixed, built houses. Is one less sensitive than others to existing communities?
- 'Normal rules do not apply'. A debate between importance of designations and tourism industry needs to happen.
- How much risk will residents accept? The risk will increase in time.
- Planned approach will provide more scope for a financial package.
- AONB includes human element
- Caravan site owners may not get rolling funding due to the level at risk.
- Finance – are we going to be able to find the money?

- Should the money needed be added to business and caravan rates straight away?
- Getting national funding last time was very difficult, this will be very, very difficult and we may not get it.
- Levy a charge per pitch could result in some people leaving so the cost to other caravans/holiday homes will rise.
- 1 in 50 standard of defence is very low and as caravan park/holiday sites are open for more months in the year the risk to life is greater.
- Change at the end of a hard defence to a soft defence could have a negative effect? A weak point?
- Science and modelling that is testing the public hypothesis. Identify what risks are, as perceived by the public.
- Legally you can't make people move during an evacuation.

### Question 3

**How would you like the Environment Agency and the Borough Council to work with you, as key stakeholders, after today, to develop a plan for dealing with the expected changes? (30 minutes)**

- Involve in regeneration plans for the area
- Site owners would use existing group to ensure involvement
- Local businesses/residents wish to be represented in SMP group
- How can be involved in giving positive message – in SMP draft? Message is currently too vague.
- Questionnaire for each property
- Ask people for history of living in the area - Realisation that it is only in recent history that caravans have become permanent.
- Door knocking (summer/weekends)
- Political stance in Norfolk is 'hold the line' – public perception
- Relocation will be needed?
- Need 1 to1 dialogue
- Need more work on economic analysis – tourism of area is important for the economy
- Good to present range of scenarios to get people thinking through public consultation
- Local maintenance issues make a big difference to the local community. This can provide reassurance that the community has not been forgotten.
- Any group needs to have some formality to emphasise its importance.
- Asking simple, direct questions. Experience from elsewhere could help with this.
- Are communities going to turn against each other by defending one part and not the other?

### **c) PDZ2 Stakeholders sub – group (Wolferton Creek to South Hunstanton)**

Following a pre-consultation meeting held with stakeholders in the PDZ 2 area on 24 August 2009, a sub-group was set up to represent the wider stakeholders. The

group was set up with the aim of working together to address the impending issues for the 2<sup>nd</sup> and 3<sup>rd</sup> epoch. The KSG had its first meeting on 18 November 2009, with a good representation of about 15 stakeholder groups. Their response was positive and they indicated their willingness to work with the partnership to achieve the best outcomes possible.

**Attendees:**

<b>Name</b>	<b>Representing</b>
Brian Long (Chairman)	BCKL&WN
Mike McDonnell	Caravan site owners & operators
Alison Haines	BCKL&WN
Mark Robinson	Environment Agency
Alan King	Hunstanton Town Council
John Norton	BCKL&WN
David Dodd	Snettisham Parish Council
Roger Drinkwater	Heacham Parish Council
Peta Denham	Environment Agency
Tom Sparke	Heacham South Beach Owners Assn
Peter Jermany	BCKL&WN
John Dobson	Norfolk County Council
Onoriode Iboje	Environment Agency
Nigel Woonton	Environment Agency
Shona O'Donovan	Environment Agency

Another meeting of the sub-group was held on 11 February, 2010. Highlights from the meeting included, a review of the terms of reference of the group, feedback on the public consultation, a presentation by The Borough Council of Kings Lynn and West Norfolk on Pathfinder funding and other funding mechanisms, a presentation on External Funding Contributions by the Environment Agency and a briefing on the EA/ BCKLWN planning protocol.



**Attendees:**

<b>Name</b>	<b>Representing</b>
Cllr John Dobson (Acting Chairman)	Norfolk County Council
John Holmwood	Heacham North Beach Owners Association
Mark Robinson	Landowners
Rob Lucking	RSPB
Tom Sparke	Heacham South Beach Owners Association
Roger Drinkwater	Heacham Parish Council
Alan King	Hunstanton Town Council
Peter Jermany	BCKL&WN
Onoriode Iboje	Environment Agency
Dale Gagen	BCKL&WN
Kevin Kent	BCKL&WN
Shona O'Donovan	Environment Agency
Jim Anderson	Environment Agency
Mark Robinson	Environment Agency
Nigel Woonton	Environment Agency

**Record of one-to-one meetings**

We have also met with some local organisations on a one to one basis, or in less formal events.

<b>Organisation</b>	<b>Date of meeting</b>
Natural England	2 <sup>nd</sup> April 2009
Gedney Joint Parish Forum	7 September 2009
Royal Society for the Protection of Birds	15th September 2009
English Heritage	3 <sup>rd</sup> February 2010
Norfolk Landscape Archaeology	3 <sup>rd</sup> February 2010

**Engaging other stakeholders**

Since the start of the review of this SMP in March 2007, we have had no formal meetings with other stakeholders.

**Public Drop –in Events**

We held three public drop-in sessions in March 2008 in King's Lynn, Boston, Wainfleet, Hunstanton and Long Sutton. We sent letters out to all key stakeholder organisations to let them know that these sessions were taking place. We also sent them a copy of the poster advertising these drop-ins, so they could inform others about them. We arranged for adverts to be placed in the local press, and sent copies of the posters to local libraries, tourist information centres and other outlets.

The dates and times of these public drop-in events were:

- March 4, 2008  
The Green Quay, Marriott Warehouse, King's Lynn, 1.00 – 7.00 pm
- March 5, 2008  
The Assembly Rooms, Boston, 1.00 – 7.00 pm
- March 11, 2008  
Coronation Hall, Wainfleet, 1.00 – 7.00 pm
- March 12, 2008  
Hunstanton Town Hall, Hunstanton, 1.00 – 7.00 pm
- March 14, 2008  
Market House, Long Sutton, 1.00 – 7.00 pm

Aims of these public drop-in events were:

- To raise awareness about the Wash SMP by disseminating general information about the Wash SMP, explaining how SMPs aim to manage flood risk up to 100 years into the future and what elements we take into consideration
- To deal with queries relating to flood risk and flooding in general
- To deal with questions and queries relating to coastal flooding and erosion
- To deal with any other questions and queries (as far as possible)
- To register interest in the SMP and continue to build a database of contacts/key stakeholders

These sessions also gave us the opportunity to meet the local people and to find out how they wished to become involved in the SMP review process.

We also held further public drop-in events in October and November 2009 to explain the draft proposed policies to all stakeholders and invited comments.

The dates and times of these public drop-in events were:

Tuesday 27 October, 2009

**Kings Lynn**, Borough Council Offices, 10-3pm

Wednesday 28 October, 2009

**Hunstanton**, Town Hall, 1-7pm

Wednesday 4 November, 2009

**Boston**, Assembly Rooms, 10-3pm

Friday 6 November, 2009

**Long Sutton**, Market House, 1-7pm

Monday 9 November, 2009

**Friskney**, Village Hall, 12-6pm

Tuesday 10 November, 2009  
**Spalding**, South Holland Centre, 10-3pm

Wednesday 11 November, 2009  
**Old Leake**, Community Centre, 1-7pm

Friday 20 November 2009  
**Wainfleet**, Coronation Hall, 1pm-7pm

We publicised the three-month public consultation period through press releases, adverts in the local press, posters publicising the drop-ins and articles in local and village newsletters. We also took information about this SMP along to similar events that formed part of the public consultation of the review of the North Norfolk SMP and the HECAG SMP.

The attendance record at each of the drop – in events is outlined below.

<b>S/NO.</b>	<b>LOCATION</b>	<b>ATTENDANCE</b>
1	Kings Lynn	50
2	Hunstanton	120
3	Boston	50
4	Long Sutton	20
5	Friskney	20
6	Spalding	50
7	Old Leake	18
8	Wainfleet (The Wash & HECAG joint event)	15

[Letter to local authorities and libraries regarding the display of the SMP main document and appendices.](#)

## The Wash Shoreline Management Plan



5

November, 2009

XXX  
XXXXX  
XXXX

Dear XXXXX,

### The Wash Shoreline Management Plan 2 – Full draft SMP

Sequel to our previous discussions with you on the above subject major, please find enclosed a copy of the full draft SMP and appendices for display in your office. The full document can also be downloaded from the following web link:

<http://www.environment-agency.gov.uk/research/library/consultations/111545.aspx>

Any comments on the content of the draft SMP can either be emailed to [washsm@environment-agency.gov.uk](mailto:washsm@environment-agency.gov.uk) or you can fill out our online feedback form. You could also send all feedback by post to Onoriode Iboje, The Wash SMP Consultation, Environment Agency, Kingfisher House, Goldhay Way, Orton Goldhay, Peterborough, PE25ZR.

Thank you.

Yours sincerely

**Onoriode Iboje**  
**Project Manager**

Letter to stakeholders notifying them of the public consultation and consultation documents.

## The Wash Shoreline Management Plan



7 December, 2009

XXXXXX  
XXXXXX

Dear XXXXX,

### **The Wash Shoreline Management Plan 2 – Non - technical summary draft document**

We are writing to you as you have previously expressed an interest in flood and erosion issues in The Wash. A partnership of organisations has drafted a document called the Shoreline Management Plan (SMP), which outlines the future of The Wash over the next 100 years.

The public consultation for The Wash SMP commenced on 12 October 2009 and will close on 15 January 2010. During this time, we are inviting members of the public to provide their comments on the draft SMP.

Please find enclosed copies of the **Non - technical summary draft document** and a CD containing the full draft SMP and appendices. The full document can also be downloaded from the following web link:

<http://www.environment-agency.gov.uk/research/library/consultations/111545.aspx>

Your feedback on the draft plan is important. Any comments on the content of the draft SMP can either be emailed to [washsmp@environment-agency.gov.uk](mailto:washsmp@environment-agency.gov.uk) or you can fill out our online feedback form. You could also send your feedback by post to Onoriode Iboje, The Wash SMP Consultation, Environment Agency, Kingfisher House, Goldhay Way, Orton Goldhay, Peterborough, PE25ZR.

Thank you and I look forward to receiving your comments.

Yours sincerely

**Onoriode Iboje**  
**Project Manager, Environment Agency**

### **National Farmers Union Events**

As a partner and key stakeholder, the NFU organised 3 SMP workshops for its members. Representatives from the Environment Agency, Natural England and the NFU gave a joint presentation on the process and implications of the draft policies for The Wash SMP. Although there were concerns about the potential impacts of the policies on agriculture the general feedback was positive as the headline policy is hold the line for the first epoch. Land owners were already aware of the potential impacts of climate change and sea level rise and were comfortable with a conditional policy that allowed for future change.

### **RFDC SMP Workshop**

As a precursor to the RFDC formal sign-off of the SMP, an SMP workshop was organised for the Central Area RFDC by the Central Area Flood Risk Team on the 21 December 2009 at the Brampton office. The workshop highlighted the various policy options for the different PDZs and the rationale behind them. Similarly, a workshop was organised for the Northern Area RFDC by the Northern Area Coastal Team on 15 January 2010 in Kingfisher House. The meeting which was well attended, yielded positive results as the reasons for the policy options were explicitly communicated to and perceived to be well understood by the members. This resulted in a general acknowledgement of the plan by the RFDC.

## B5 Consultation Register

During the review of this SMP, we kept a record of the comments received from all stakeholders and the actions we have taken to consider them in the final SMP. We updated this register as we received comments from stakeholders during the three-month consultation period, from 12 October 2009 until 15 January 2010. All comments that were not relevant to the SMP were passed on to the team or organisation that could deal with them. We acknowledged receipt of all comments within 10 days of receiving them, but sent a full reply detailing how we have considered them in the SMP later on in the review process.

A copy of the generic acknowledgement letter is shown below.

### The Wash Shoreline Management Plan (SMP) 2



23 November 2009

Address

XXXXXX  
XXXXXX  
XXXXXX

Dear,

#### The Wash SMP 2 Public Consultation

I am writing to thank you for taking part in the public consultation for The Wash SMP which commenced on 12 October 2009 and will close on 15 January 2010.

We appreciate your feedback, which is an indication of your interest in coastal flood and erosion issues around The Wash, and its proper management over the next 100 years.

Your feedback on the draft plan is important. As such, your comments have been forwarded to the consultants who are working on the final SMP document.

Please forward any further comments or questions on the content of the draft SMP by email to [washsmp@environment-agency.gov.uk](mailto:washsmp@environment-agency.gov.uk) or you can fill out our online feedback form at <http://www.environment-agency.gov.uk/research/library/consultations/111545.aspx>.

Alternatively you can send your comments by post to Onoriode Iboje, The Wash SMP Consultation, Environment Agency, Kingfisher House, Goldhay Way, Orton Goldhay, Peterborough, PE25ZR.

Thank you.  
Yours sincerely

**Onoriode Iboje**  
**Project Manager**  
Environment Agency



**THE WASH SMP CONSULTATION REGISTER – 12 OCTOBER TO 15 JANUARY 2010**

S/NO	CONSULTEE	DATE RECEIVED	COMMENTS	ACTION/ RESPONSE
1	Ian Simmons	12/11/09	<p>As a retirement project I have been looking at the landscape evolution of the coast-toft-fen zone between Skegness and Wrangle, a region in which I was a wartime evacuee from East London. This is much wider than your zone of interest, but includes some of it. The work is well on but none of it is as yet published. The historical material in C4.1 has a few odd statements that I would disagree with:</p> <p>C4.1 paragraph 1 The Saxon period effectively ended with the Norman Conquest in 1066 and so the period of reclamation you refer to is probably better called the high Middle Ages. In all probability the reclamation along this coast started in Late Saxon times when the great embayment up the Witham and probably inland to Horncastle began to be colonised. The first sea-banks are thought to be pre-Conquest. The great period of reclamation in 1200-1250 was partly of salt-marsh (and in the cause of making salt, where the wastes became the Tofts) but also of fen. The Low Grounds of Wainfleet St M, Friskney and Wrangle may well have been a mixture of tidal creeks and bog, a type of ecosystem not now present in the B Is.</p> <p>The big push of salt-marsh reclamation started exactly where you would expect, in the lee of Gibraltar Point, with an intake ca 1560 of which most was in Croft and Wainfleet St M. The next batch grew out from that and then came 'round the corner' towards Friskney. There is an interesting 1606 map of Wrangle foreshore which is very uncertain about the amount of reclamation to that time. But some of the intakers in Wainfleet St M noted that there was no sea bank there but that the Tofts kept out the sea.</p> <p>Further, I found the Bibliography file very interesting but frustrating since you allude to published work e.g. by David Brew but that document does not give a proper citation, unless I have missed it. So where do we find the references given in the other documents? And if you mention reclamation at all along the stretch from the Norfolk border to Friskney then the benchmark work is H. E. Hallam's book of 1965.</p> <p>I wonder about policies that allow retreat in the effect that there might be on the groundwater in e.g., the East Fen. As I understand it, there are saline 'hot spots' already and the farmers using drains for irrigation water are asked to pump only from the surface water of the drains. If there is managed retreat of the Freiston kind, will this affect the level and salinity of the groundwater inland? (I'm neither an engineer nor geomorphologist so this is a genuine question out of ignorance). And will continued shrinkage of the land surface of e.g. the Fen (I suppose there is still peat to be lost -- look at the SPOT images) affect your judgements at where lines might be held?</p> <p>Obviously, I can supply you with a lot more detail but since it is background to your work, you won't want that. I could re-draft the beginning of C4.1 a bit if that was any help.</p>	<p><b>Points 1 and 2</b></p> <p>The text has been amended based on our discussions with David Brew. Below is an extract from section C4.1 with the amended sections highlighted in italics.</p> <p>"In more recent historic times, the shoreline has moved as much in response to the land claim of fringing salt marsh <i>and fen</i> as to natural processes. This history of land claim really started in the 13th century when farmers were eager to exploit the fertile land formed from siltation of estuary deposits. Consequently, the great Sea Bank (Roman Bank) was built to form a continuous barrier to the tides. It stretched <i>along the majority of the embayment, stopping only at the Tofts ridge, a significant topographical feature located between Wainfleet and Friskney. This embankment and the Tofts ridge formed the landward limit of tidal flooding and defined the new position of the shoreline. The origin of the Tofts ridge is uncertain and has been widely disputed. The majority of the theories agree that the ridge is associated with salt making activities, which began in the Iron Age and were an important industry for the area. Salt making involved extracting salt from sediment collected from the intertidal zone. One theory for the origin of the ridge is that waste sediment from the salt making process was discarded in one location and this artificially elevated the natural topography. This formed the mound now known as the Tofts ridge. Other theories are based on the belief that the ridge feature is too large to have been formed artificially (as a result of salt making) and therefore there must have also been some natural processes at work (and the dumping of waste from the salt making activities simply added to the already raised elevation of the land in the area). (Brew et al 2000, Brew and Williams 2002).</i></p> <p>In the 13th century, serious and repeated fluvial flooding of areas upstream of The Wash forced inhabitants to alter the drainage of the fenland. As a result, most of the freshwater that used to flow to The Wash was diverted along its eastern side, causing increased siltation in the embayment due to the reduction in fluvial flushing. This led to extensive salt marsh development in the western section of the embayment which later spread until an extensive strip of around four kilometres wide had built up in front of the sea bank. The most major phase of land claim in The Wash initially focused on this area of salt marsh. <i>Land claim started in the lee of Gibraltar Point towards the end of the 16<sup>th</sup> century. The most noticeable phase of land claim was in the 17<sup>th</sup> century, when it was extended out from the 16<sup>th</sup> century reclamation and then in a southerly direction towards Friskney.</i> Since that time, some 320km<sup>2</sup> of The Wash has been turned into agricultural land, continually changing the position of the shoreline in the process (<i>Brew et al 2000, Brew and Williams 2002</i>)."</p> <p><b>Point 3:</b></p> <p>Thank you for raising this issue. The citation to Brew and Williams work was incorrectly referenced in Appendix C. The reference should be "Brew and Williams 2002", instead of "Brew and Williams 2004". The required</p>

				<p>amendments have been made in Appendix C (see above text). This now ties in with the references list provided in Appendix I. We have also insert the Brew et al 2000 reference into Appendix C (see above text) as this was also missing.</p> <p><b>Point 4:</b> This level of detail will be dealt with in the next phase when a Strategy is produced to provide further detail on the overarching policies set out by the SMP.</p>
2	June Bell (Mrs) Rep Snettisham Beach Property Owners Association	12/11/09	<p>As a member, I have been asked by the chairman of Snettisham Beach Property Owners Association to look through the Wash Shoreline Management Plan 2. I am puzzled by the fact that in PDZ 2 on page 23, there is a concrete sea defence clearly marked at Hunstanton and no mention of the concrete sea defences at Snettisham Beach or Heacham Point (between Snettisham and Heacham). I cannot see any reference in the text either and would be grateful if you could explain why these two important and heavily engineered areas are not shown or referred to.</p>	<p>In addition to the hard defence which should have been shown between Hunstanton and the ramp at Heacham North beach, there are two isolated lengths of hard defence in PDZ2:</p> <ul style="list-style-type: none"> <li>• Just to the north of Snettisham Scalp (Heacham Dam) which consists of approx. 400m of revetment.</li> <li>• Just south of Snettisham Scalp (protecting the properties) which consists of approx. 550m of sea wall/revetment.</li> </ul> <p>We have taken account of these isolated sections of defence: they are listed in the defence assessment tables provided in Appendix F (see p.F19) and were included (to some extent) on the relevant figures in Appendix F (see pages F26 to F28). They have, therefore been taken into account in policy development. However, not mentioning them specifically in the policy statements and on the policy maps is an omission and this will be corrected. Although these changes need to be made to the documents, there is no overall impact on the draft policy for PDZ2:</p> <ul style="list-style-type: none"> <li>• In the short term we say that the frontline defences will be held, so this will apply to both the shingle ridge and hard defences.</li> <li>• In the long term, there is uncertainty, and this uncertainty would still apply to the hard defences as well as the shingle ridge in PDZ2. There is a possibility that the isolated lengths of hard defence could be used in flood defence strategies, or it may be that they are subject to Managed Realignment or No Active Intervention. This is beyond the scope of the SMP given the uncertainties/issues highlighted in the SMP documentation. A review of the defences is planned to be undertaken between 2010 and 2013.</li> </ul>
3	Sarah J Land le Strange Estate	19/11/09	<p>It is set out in the strategy plan that the town is of importance and should be defended as Hunstanton should continue to be a viable tourist destination and regional commercial centre. In particular we object to the proposals that are set out in relation to the Cliff Top Car Park and pitch and putt course. We would request that active management is undertaken to preserve this area, the car park provides an important facility for visitors to Hunstanton for using the town and the beach. The potential loss of this area will have a huge effect on the town. Hunstanton has pre-historic origins and on the cliffs near the lighthouse stands the ruins of St Edmunds chapel which dates back to 1272. The lighthouse was first built in 1666. We suggest that the chapel and the light house have historic interest and should remain protected and are classed as a feature on historic interest as outlined in page 67 Historic Environment of the Wash SMP2.</p>	<p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years. In order to do this the plan sets out a number of principles. The specific ones that apply to your concerns are listed below.</p> <p><i>"To ensure that localised decisions do not affect the natural balance of the coastline and shoreline management elsewhere."</i></p> <p>Hunstanton cliffs are not defended and are therefore subject to natural erosion. The material eroded from the cliffs is a source of sediment which feeds the beaches along the frontage between Hunstanton and Snettisham Scalp. If the decision to prevent further erosion was taken we would need to look very carefully at the impact this would have on the remainder of the frontage and its importance as a beach holiday attraction.</p>

				<p><i>“To ensure that shoreline management recognises the character of the coastal landscape.”</i></p> <p>The cliffs at Hunstanton are a significant landscape feature associated with the town. They are often used in information about the town to identify its character and interest. Any proposal to defend the cliffs would need to ensure that the visual character and environmental importance of the cliffs are maintained. This requirement would have to be balanced against the other objectives of the plan which include:</p> <p><i>“To ensure that shoreline management has regard to the historic environment” and “.....supports conservation and enhancement of biodiversity”</i></p> <p>Based on current information, it is not clear how significantly the cliff top will be affected during the first and second epochs i.e. up to 2055. The action plan arising from the SMP will include the need for on-going monitoring and review of the cliffs in order to establish the rate and impact of cliff erosion. In the meantime we will need to give consideration of what action, if necessary, could be taken to reduce the rate of erosion that would not impact on the Hunstanton to Snettisham beaches or the visual and environmental importance of these cliffs.</p> <p>As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme and a strategic review of PDZs 2, 3 and 4. This will enable us to understand in more detail how the coastline is reacting to sea level rise.</p> <p>Through development of the Action Plan we will inform key stakeholders of how we can work collaboratively to manage these issues.</p>
4	W G Hawkins Chairman, Residents Clarence Court Management Company, Hunstanton	09/11/09	<p>In the first instance, I would like to welcome your plan to prevent further cliff erosion to sustain the properties and the road once an as yet undefined critical point is reached. It would be reassuring for there to be a greater clarity as what this critical point is - how much distance will be maintained between the cliff edge/sea and the road? The road in question being Cliff Parade, Hunstanton or B1161 as your document described it. May i ask you to address this point in the final plan please? Secondly, I query the desirability of allowing the cliff to erode to such a point that it starts to threaten cliff top properties and the B1161. I have been a visitor to Hunstanton since the mid 1950's and the green grass strip along the cliff top from the town to the lighthouse has always been a valuable amenity for the town and an attraction to visitors and residents alike. It is now already considerably narrower than when i was a boy, but is still a very busy, much loved and enjoyed space that really must not be allowed to shrink any further, as it would then lose its appeal and usefulness as a wide popular multi - function space where people can simultaneously enjoy games, jogging, walking with or without dogs, picnics and other activities such as kite flying in safe harmony with each other. I would therefore urge that the promenade and sea defences be extended from their existing end point to a point beyond the former lighthouse and coast guard lookout with some urgency.</p>	<p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years. In order to do this, the plan sets out a number of principles; the specific ones that apply to your concerns are listed below.</p> <p><i>“To ensure that localised decisions do not affect the natural balance of the coastline and shoreline management elsewhere.”</i></p> <p>The value of the green space on the cliff top is acknowledged, and may need more emphasis in the documents. However, the SMP needs to balance its value, and that of the lighthouse, against the consequences of the prevention of cliff erosion. This could reduce sediment transport to the south, possibly reducing the beach in front of the Hunstanton promenade; it would have a negative effect on the appearance of the cliff face and it's geological and landscape value; it would of course also be costly.</p> <p><i>“To ensure that shoreline management recognises the character of the coastal landscape.”</i></p> <p>The cliffs at Hunstanton are a significant landscape feature associated with the town. They are often used in information about the town to identify its character and interest. Any proposal to defend the cliffs would need to</p>

				<p>ensure that the visual character and environmental importance of the cliffs are maintained. This requirement would have to be balanced against the other objectives of the plan which include:</p> <p><i>“To ensure that shoreline management has regard to the historic environment” and “.....supports conservation and enhancement of biodiversity”</i></p> <p>Based on current information, it is not clear how significantly the cliff top will be affected during the first and second epochs i.e. up to 2055. The action plan arising from the SMP will include the need for on-going monitoring and review of the cliffs in order to establish the rate and impact of cliff erosion. In the meantime we will need to give consideration of what action, if necessary, could be taken to reduce the rate of erosion that would not impact on the Hunstanton to Snettisham beaches or the visual and environmental importance of these cliffs.</p> <p>We are working in partnership with local authorities and other partner organisations to ensure that we strike a balance between our objectives. As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme and a strategic review of PDZs 2, 3 and 4. This will enable us to understand in more detail how the coastline is reacting to sea level rise.</p> <p>Through development of the Action Plan we will inform key stakeholders of how we can work collaboratively to manage these issues.</p>
5	Mr Conin Brown	02/11/09	Our views concerning the coastal defence along The Wash are to build a barrier across The Wash from Skegness to Hunstanton. This could incorporate a Hydro - Electric Scheme. The cost would only be about £200 million.	<p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years.</p> <p>In early 2009, the Environment Agency invited Mr Dawe to give a presentation on The Wash Tidal Barrier to a small audience made up of flood risk professionals and environmentalists. His approach had not fully considered the impacts that a scheme of this magnitude would have on flood risk and the European designated site under the European Habitats Directive.</p> <p>Following his presentation we wrote to Mr Dawe confirming our position which in brief asked for a number of key areas to be addressed. When we receive the necessary information requested we will be able to assess the full implications this scheme may have upon The Wash and its coastline.</p> <p>Given the limited information available, the SMP Client Steering Group made a conscious decision not to include The Wash Tidal Barrier as an option in this SMP. With more information it could be considered in future revisions of the SMP.</p>
6	Chris Edwards Royal Yachting Association	30/11/09	The Eastern Region of the RYA welcomes this opportunity to comment on the Wash SMP. The following comments are addressed against each Policy Development Zone (PDZ): PDZ1 - no direct impact on recreational boating - long term Wash changes as a result may impact but impossible to predict. PDZ2 - major implications for recreational boating depending on the choice of action. Snettisham Beach Sailing Club could be at risk of relocation/closure or have significant changes to	<p>We recognise the importance of The Wash as a leisure facility for sailing and the benefits it provides. The intent of the SMP is to set policy on how we manage our coastline against the threat of erosion and flood risk over a 100 year plan period.</p> <p>It is not the intention of the SMP to impact upon this facility but as you acknowledge in your letter, things may have to change as a result of coastal</p>

			sailing area if accretion continues. What support for club and members will be available if this should happen? PDZ4 - impact of erosion of cliffs etc. will change shore profile and may impact on the sailing of Hunstanton Sailing Club, but again impossible to predict. It would be advantageous to have specific acknowledgement of the need to keep open the beach ramp that is used by the SC to launch and recover their boats. We have concerns that for all aspects of the plan there are question marks over funding and its implications for stakeholders. Please do not hesitate to contact me if you have any questions or queries arising from our response. On behalf of the Eastern Region of the RYA, I would wish to be involved in future consultations or discussions	processes. We are already in discussions with stakeholders who have a particular interest along PDZ 2. As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme and a strategic review of PDZs 2, 3 and 4. This will enable us to understand in more detail how the coastline is reacting to sea level rise. Through development of the Action Plan we will inform key stakeholders of how we can work collaboratively to manage these issues.
7	Steve Lumb Boston Borough Council	14/01/10	I confirm that the Borough Council/s decision on the consultation draft is to hold the line for all three epochs. The Borough Council did not support Managed Realignment in the 2nd and 3rd epochs.	As part of the SMP partnership group, at which your council is represented, your concerns are noted and we will seek to resolve these matters through the partnership process. May I take this opportunity to thank you for your involvement in the development of the plan and for your time in responding to The Wash SMP 2 consultation.
8	Mr Stan Pywell Welland and Deepings Internal Drainage Board	10/12/09	I refer to the document and comment as follows: Page 8: the Water alliance is one of a number of Drainage boards within the plan area. The reference on the bottom page 8 would indicate it is the only board. Page 20: the penultimate paragraph "most significant increase on the south western flank of The Wash, particularly between the rivers Nene and great Ouse" - should this be Nene and Welland? Page 50: the last paragraph. 2Provided secondary banks remain substantially intact" then I would agree they provide additional protection. However, it appears in places they are being removed or their integrity severely affected. This matter needs to be addressed by the Environment Agency. The board's frontage falls within PDZ1.	We have read through your comments and support amending the text in light of your feedback on pages 8 and 20 respectively of the main document.  The point you raise about relic lines of former reclamation (secondary banks) is an important issue. The Environment Agency's investment priority is to maintain the current strategic coastal defence line and therefore we do not invest in any former relic lines. We acknowledge that in an event today, the relic line would serve a benefit but to what degree is debatable due to size, condition, location etc.  The benefits that relic lines may have in the future needs to be further explored and the SMP Action Plan include an item to do this.  Through the development of the SMP Action Plan we will inform key stakeholders like you, of how they can play an important role in the process.
9	Paul Tame NFU East Midlands Region	14/12/09	The NFU organized two meetings for farmers in the Wash SMP area at Boston and Spalding and a number of points were raised in response to the consultation draft. These included the following: - Habitats Regulations. Farmers felt that Defra interprets the Habitats Regulations in an extreme way which maximizes the amount of habitat to be created as a result of the plan. Before extra habitat has been identified on the Wash, Defra or Natural England must review the implementation of the Habitats Regulations in this country to ensure that any compensatory habitat figures are fair, not just to the environment but to the landowners and farmers from whom the land to create the habitat is demanded. We believe other regions are looking for areas of land in the Wash to place compensatory habitat as a result of their SMPs. They should be denied on the basis that habitat must be re-created as near as possible to the area where it is being lost. The statistics for accretion and sea level rise in Appendix C to the Wash SMP in the past and future must be checked and collected with the utmost rigour, for the future habitat requirements depend on this data. Natural England will obviously be involved in the collection of this data, but it needs to be independently verified to prevent accusations of bias towards the agencies collecting the information. The SMP was too depressive about the prospects for the Lincolnshire coast and contributed to blight in the area. The	<b>Conditional policies</b> Through our discussions at the Client Steering Group (CSG) meetings you will be aware that this matter has been covered at length. The CSG agreed to conditional policies on the basis that the evidence for accretion/erosion of the foreshore was inconclusive. This decision was also confirmed following discussions with both Natural England and Defra. <b>Hold the Line</b> The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties mentioned above it was recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability and provide opportunities to replace the loss of habitat under current legislation. <b>PDZ2</b> As you acknowledge, the Environment Agency has already demonstrated its commitment to working with local stakeholders to find a long term sustainable solution for this policy unit. As part of this commitment we have already allocated funding to undertake a complete strategic review of the defences between Wolferton Creek and the northern end of the cliffs at

			<p>SMP should be much more upbeat saying how safe it was to develop here in comparison to other places. We are concerned that the SMP as it is currently worded will encourage people to leave the area and for businesses to go elsewhere. More reassurance was needed for local communities than is currently contained in the plan. Secondary sea defences. The meetings were clear that they existed but very unclear about what the SMP will be doing to ensure they are protected. Should they be protected? If so, how? Their status should be clarified in the finalized SMP.</p>	<p>Hunstanton (PDZs 2 to 4 inclusive).  <b>Habitats Regulations</b>  It is not within the scope of an SMP to review government policy. We would recommend that as a nationally recognised organisation, you may want to make a formal representation to Defra.  <b>Secondary defences</b>  The Environment Agency's investment priority is to maintain the current strategic coastal defence line and therefore we do not invest in any former relic lines. We acknowledge that in an event today, the relic line would serve a benefit but to what degree is debatable due to size, condition, location etc.  The benefits that relic lines may have in the future needs to be further explored and the SMP Action Plan include an item to do this.</p>
10	Jane Ripley Secretary to Gedney Parish Council	15/12/09	<p>Gedney Parish Council has three main points to voice in reply to the SMP2 consultation they are as follows: The council are strongly in favour of maintaining and re-instating 2nd line defences and feel there is no one taking responsibility for this. The security of grade 1 &amp; 2 agricultural land to provide food security is of the utmost importance and clarification on the implementation of this during a "managed retreat" seems to be missing from the policy. Council are concerned that the "creating of natural Habitat" for birds and wild life seems to be of more importance to many agencies than the preservation of good agricultural land.</p>	<p><b>Secondary defences</b>  The Environment Agency's investment priority is to maintain the current strategic coastal defence line and therefore we do not invest in any former relic lines. We acknowledge that in an event today, the relic line would serve a benefit but to what degree is debatable due to size, condition, location etc.  The benefits that relic lines may have in the future needs to be further explored and the SMP Action Plan includes an item to do this.  <b>Hold the Line</b>  The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability and provide opportunities to replace the loss of habitat under current legislation.  The Wash sea defences currently protect in excess of 200,000 Ha of grade 1&amp;2 agricultural land. As part of the continued coastal protection we rely heavily on sediment being transported down the coast which is deposited in The Wash and helps our foreshores to grow. Our foreshores are an important element in flood defence and we rely heavily on their presence to reduce water depth, reducing wave energy and wave height which attack the defences. As a result of climate change and sea level rise we may see our foreshores disappear which will impact on the stability of our sea defences and increase the risk of failure, as they suffer greater attack from the sea.</p>
11	Paul Williamson The British Association for Shooting and Conservation	17/12/09	<p>BASC are grateful for the opportunity to respond to this consultation and look forward to working with the Environment Agency as the process moves forward. BASC was founded in 1908 as the Wildfowling Association of Great Britain and Ireland and is the UK's largest shooting association. BASC is constituted as an Industrial and Provident Society and has a membership in excess of 130,000. BASC is the representative body for sporting shooting in the UK and the largest field sports organisation. It aims to promote and protect sporting shooting and the well being of the countryside throughout the UK and overseas. It actively promotes good firearms licensing practice, training, education, scientific research and practical habitat conservation. BASC believes that all who shoot should conduct themselves according to the highest standards of safety, sportsmanship and courtesy, with full respect for their quarry and a practical interest in wildlife conservation. BASC's</p>	<p>We acknowledge your support for the emerging policies from The Wash SMP 2. We also recognise the long standing and culturally important activity of wildfowling and the sensitive nature of the habitats over which wildfowling shoot.  It is not the intention of the SMP to impact upon your activities, as evident in one of the stated principles of the SMP which is <i>"To ensure that shoreline management supports the sustainable provision of the social and economic values of the area to the wider society"</i>.</p>

			<p>expertise in shooting matters is widely recognised and it is routinely consulted by a variety of government departments and agencies (including the Home Office, Defra, LANTRA &amp; The Health and Safety Commission) and other statutory and non-statutory bodies. BASC represents approximately 165 affiliated wildfowling clubs in the UK with a total membership of around 15,000 individuals. Wildfowling clubs manage more than a quarter of a million acres of land (104,000 hectares) in the UK, 90% of which is designated as sites of special scientific interest (SSSI). In England, Wales and Northern Ireland BASC affiliated wildfowling clubs lease some 700km of foreshore from the Crown Estate. Increasingly, wildfowling clubs are buying farmland that had previously been drained to allow farming. These areas are now being returned to wetland for the benefit of wildlife and quarry species. This complements Environment Agency managed realignment schemes and flood risk management. Wildfowling is the pursuit of quarry species of ducks, geese and waders with a smoothbore gun, principally on estuaries and coastal marshes but also on large wetlands further inland. Wildfowling is usually a solitary activity and in England and Wales takes place from 1st September to 20th February on the foreshore and ending 31st January inland. Wildfowling is a recreational benefit for local communities and wildfowling clubs provide a focus for wardening of land, monitoring of wildfowl and habitat protection and improvement. The Birds Directive (1979) fully recognises the legitimacy of hunting of wild birds as a form of sustainable use. Wildfowling is an activity that provides significant social, cultural, economic and environmental benefits in the UK. Management of the wildfowl resource by local communities is integral to the management of wildlife on our coasts and an important aspect of our coastal heritage. Land managed for wildfowling often plays an important role in local flood management risk strategies and wildfowling clubs are well placed to deliver continued benefits to such strategies, especially in the management of land involved in managed realignment projects. Wildfowling clubs manage land involved in Environmental Stewardship and Higher Level Stewardship schemes. BASC encourages more clubs and members to participate in such projects. We recommend greater empowerment of local communities in the management of land as a long-term strategic benefit to flood risk management. As stated, many clubs undertake conservation work on the land on which they shoot, actively participating in Environmental Stewardship schemes for example, and undertake regular litter removal and clean-up work on the coast. Natural England (NE), which is the statutory conservation agency for England, recognises the value of shooting to conservation. BASC recognises the importance of the coastal environment and the need to balance different user needs. The Wash Shoreline Management Plan draft consultation should recognise the long standing and culturally important activity of wildfowling and the sensitive nature of the habitats over which wildfowlers shoot. In 2004, an estimated 2.6 million work days were undertaken on habitat and wildlife management as a result of sporting shooting in the UK. This is the equivalent of 12,000 Full Time Equivalent jobs. As a result of sporting shooting, £250 million was spent on conservation activities and that shooters themselves contributed 2.7 million work days, the equivalent of 12,000 full time jobs. £8 million alone was spent on tree planting. The total value of sporting shooting to the UK economy in the same year was £1.6 billion. (Source 2006. PACEC. Economic and Environmental Impact of Sporting Shooting in the UK. Available online at <a href="http://www.shootingfacts.co.uk">www.shootingfacts.co.uk</a>), Given this level of involvement, we hope that developing policy will recognise the important contribution shooting makes to the environment, and that the activities of those</p>	
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			involved will not be inadvertently restricted. BASC acknowledges the visions outlined in the consultation document for Wash Shoreline Management Plan draft consultation. BASC believes this process complements existing government coastal initiatives which BASC and its members are actively involved in at national and local levels e.g. Marine Bill, Coastal Change Policy, Natural England and Environment Agency programmes.	
12	Sam Godfrey	27/12/09	<p>I am a farmer based on Holbeach Marsh, South Lincolnshire. This falls in policy development zone 1 of the Wash Shoreline Management Plan. I am concerned that the Wash Shoreline Management Plan has been hijacked to some extent by the conservation lobby, so that in epochs 2 and 3 there will be managed re-alignment to increase the size of the intertidal habitat. As a policy this has many faults: 1. Distortion of the market for buying, selling and renting agricultural land 2. Loss of jobs in the agricultural sector, which is particularly important to this region 3. Social implications of not allowing family farms to continue on the land that they have farmed for generations (and the associated lack of security whilst the threat of managed realignment hangs over these farms). But my main concern is the deliberate misrepresentation of the Habitats Regulations in the appropriate assessment and the main summary document. To say that it is policy to compensate for loss of habitat due to sea level rise (coastal squeeze) is one thing, but to say that it is a requirement of the Habitats Regulations will leave the Shoreline Management Plan open to legal challenge under the Habitats Regulations. I have highlighted my specific concerns with each section of the Shoreline Management Plan below, and added some more general concerns at the end. Non Technical Summary, Page 18; Draft Management Plan Page 66 – 67 &amp; Page 71 “A realignment would...provide compensation for the intertidal habitat loss caused by coastal squeeze, as required under the Habitats Regulations.” This sentiment is often quoted in Environment Agency and Natural England literature. Yet it is not true to say that the Habitat Regulations require compensation for the intertidal habitat loss caused by coastal squeeze. Part IV, paragraph 48 says: “(1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which- (a) is likely to have a significant effect on a European site in Great Britain (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of the site, shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives.” The Environment Agency and Natural England appear to interpret that a plan to maintain/raise the Wash bank is “a plan or project which is likely to have a significant effect on a European site”. It is not the bank which is encroaching on the designated sight. It is the sea. Therefore it is not the bank (and the maintenance/raising of the bank) which is having a significant effect on the site. The sea is rising due to climate change. Climate change is not a plan or project and therefore does not require consent and there is therefore no need to invoke part IV regulation 53 of the regulations to compensate for a loss of habitat. It is not true to say that the plan causes coastal squeeze and that if it were not for the maintained bank under a “hold the line policy”, then the site would migrate inland. The boundary of the site is the toe end of the Wash bank, even if the Wash Estuary migrated landward, the designated part of the estuary would not move. So the bank is not preventing the site moving in land. It would therefore be more appropriate to say “A realignment would...provide compensation for the intertidal habitat loss caused by coastal squeeze, in accordance with Government Policy” rather than invoking the Habitat Regulations.</p>	<p>As part of the continued coastal protection we rely heavily on sediment being transported down the coast which is deposited in The Wash and helps our foreshores to grow. Our foreshores provide an important benefit as a flood defence measure and we rely on their presence to reduce water depth which reduces wave height and energy from attacking the defences. As a result of climate change and sea level rise we may see our foreshores disappear which will impact on the stability of our sea defences and increase the risk of failure, as they suffer greater erosional attack from the sea.</p> <p>It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary. Where it becomes necessary to realign to provide a more sustainable sea defence to protect people and agriculture, opportunities will be taken to provide habitat replacement at the same time. By managing our sea defences in this way we are able to reduce the risk of failure and give confidence by providing a good standard of protection around The Wash.</p> <p>The definition of coastal squeeze, as defined by Defra, which is outlined in the glossary of terms in the SMP is “ <i>the reduction in habitat area that can arise if the natural landward migration of a habitat due to sea level rise is prevented by the fixing of the high water mark, for example a sea wall (sea defences)</i>”. Therefore the existence of The Wash sea defences may by definition contribute to the loss of intertidal habitat through coastal squeeze.</p> <p>The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability and provide opportunities to replace the loss of habitat under current legislation. All SMPs are required to work to current legislation, however, if government priorities change, then future SMPs will review their policies.</p> <p>We acknowledge your point on the “glaring omission” of the potential costs needed for compensation of land owners (in a realignment option) or habitat compensation (in a hold the line option). Based on the uncertainties surrounding epochs 2 and 3, at this time, we are unable to give an estimate and this was made clear in the main document. However, through the development of the SMP Action Plan we will continue with our coastal monitoring, which will provide us with better information. This will enhance our understanding of how the coastline is reacting to sea level rise, which will feed into the next SMPs and enable firmer decisions. This will include more detailed benefit cost comparisons, which will include compensation costs. We have amended the text in text box 2.1 to clarify.</p>



			<p>This would not change the substance of the Wash Shoreline Management Plan, but would remove the risk of legal action against the Wash Shoreline Management Plan. Draft Wash SMP Main Document, Page 52 The shoreline management plan sets out a table of costs of “managed realignment” versus “hold the line” in an erosional versus an accretional future per 10 km of shoreline. This table shows that the cost of holding the line 10 km of shoreline in an erosional future is about £15million, whereas the cost of a managed realignment for a 10 km stretch of shoreline under an erosional future is about £11 million. The estimate does not include the potential costs needed for compensation of land owners (in a realignment option) or habitat compensation (in a hold the line option). This is a glaring omission and needs to be included as it is highly likely that in most cases this would change the economics from a “managed realignment” option being the cheapest, to a “hold the line” option being cheapest. Appropriate Assessment The Appropriate Assessment of the effects of the shoreline management plan accepts that it is sea level rise and NOT maintenance of the sea banks that would cause the loss of intertidal habitat (appendix M, pageM8): “Intertidal sites are located seaward of existing defences along the majority of The Wash frontage. Intertidal habitat (saltmarsh and mudflat) are sensitive to the effects of sea level rise leading to loss of intertidal habitat or shifts in the composition of habitat type.” However, the assessment goes on to say that holding the line would cause affect the integrity of The Wash by coastal squeeze (appendix M, pageM8): “... the SMP has the potential to alter the structure and function of The Wash, through holding the line which may lead to intertidal habitat being lost through coastal squeeze” This is not correct. It is the seal level rise which is leading to intertidal habitat being lost, not the fact that the existing line is being held. The appropriate assessment of the affects of the shoreline management plan emphasizes that in-combination effects (i.e. where the combination of the shoreline management plan and other factors are considered together) are only those where the effects of the shoreline management plan is combined with other plans or projects (Appendix M, page M22): “It should be repeated that in-combination effects relating to SMP policy are only those where an effect of SMP policy, when combined with the effect of another plan or project, will have an adverse effect on the integrity of the site.” Sea level rise is not a plan or a project. So the effects of holding the current defence line should not be considered in combination with sea level rise. This means that coastal squeeze, caused by a combination of sea level rise and holding the existing defence line should not be considered. The Appropriate Assessment goes on to say (Appendix M, page M22): “It is not the intent of the assessment to use SMP policy to alleviate the effects of plans where the selected policy has no effect, but an alternative policy could help to address adverse effects of other plans... the Appropriate Assessment is devised to solely address possible adverse effect, not opportunities for remediation.” But to propose managed realignment to compensate for loss of habitat caused by sea level rise is to use SMP policy to alleviate where the selected policy (i.e. holding the line) has no effect. It is the sea level rise that is having the effect, and the Appropriate Assessment is being used as an opportunity to remediate in direct contravention of the above statement. The whole consideration of the Wash Shoreline Management Plan, policy development zone 1 is based on an assessment of a combination of the Wash Shoreline Management Plan, and sea level rise. This is not in accordance with the definition of an appropriate assessment as set out in the Habitats Regulations. This means that the Appropriate Assessment needs to be re-worked so that it considers the shoreline management</p>	
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13	Trustees of The Henry Smith Charity	31/12/09	We have considered the content of your consultation document with particular reference to PDZ 1. We wish to support your policy 'How to achieve continued defence against flooding' in order to protect the established settlements and the low lying area in this vicinity generally. We consider that it is important that you should	We acknowledge your support for the emerging policies from The Wash SMP 2 and confirm that the intent of the SMP is to set policy on how we manage our coastline against the threat of erosion and flood risk over a 100 year plan period. The current draft policy of 'Hold the Line' for PDZ1

			<p>increase the activity level of flood protection to sustain the existing level of flood risk or preferably, aim to reduce flood risk further. This is considered to be most important due to the protection required by: 1. the existence of the established settlements. 2. the high importance of the top quality agricultural land in the area generally and the employment that is dependent upon it. 3. the high designation of this part of The Wash being included under the Register of European Sites (UK000802a).</p>	<p>recommends keeping pace with climate change which could see defences improved.</p> <p>It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary. Where it becomes necessary to realign to provide a more sustainable sea defence to protect people and agriculture, opportunities will be taken to provide habitat replacement at the same time. By managing our sea defences in this way we are able to reduce the risk of failure and give confidence by providing a good standard of protection around The Wash.</p>
14	Brendan Rooney	01/01/10	<p>I am hoping to comment on the development of the Wash SMP, particularly the PDZ 1 (Gibraltar Point to Wolferton Creek). I agree that hold the line or managed re-alignment must be used to protect all established settlements and infra structure and that this may mean the loss of some isolated dwellings and farm land. However, it is essential that whichever of these strategies is employed, that the current level of protection (e.g. a 1 in 200 year event) be maintained or preferably improved. It is also necessary to amend or adapt planning policy for the vast area of fenland affected. I understand the logic of not developing on flood plains, however, in most areas of the country there are other suitable areas that can be developed instead, this is not the case in the area covered by PDZ1. If significant developments are not allowed or encouraged in this area there are bound to be significant negative effects for the prosperity of the population (approximately 400,000).</p>	<p>The intent of the SMP is to set policy on how we manage our coastline against the threat of erosion and flood risk over a 100 year plan period. The intent of the current draft policy of 'Hold the Line' for PDZ1 recommends keeping pace with climate change which could see defences improved.</p> <p>Land use planning is considered under a different policy. The East Midlands Regional Spatial Strategy (RSS8), for how we manage development within the coastal floodplain, will be informed by the Lincolnshire Coastal Study (LCS). The study looks at balancing socio-economic needs against flood risk. The study is being led by Lincolnshire County Council and involves Regional Government, three local coastal authorities and the Environment Agency. The study will be completed by the end of March 2010 and is subject to public consultation during the summer and ultimately will provide local planning authorities, like Boston, with a framework to deliver appropriate housing needs for their district.</p>
15	Douglas Dickens	11/01/10	<p>We will need all wash land for food production so should hold the line, at the least, or extend it like Holland. Your department has raised no objections to the continuing industrialisation of the most fertile agricultural land in the country, in particular by allowing Power Stations to be built, and expand in this area. I have objected to DECC on Spalding Energy's expansion plan on the grounds of acid rain production. they admit the orange plume from the stacks contain the gases which combine with water vapour to produce acid rain. The recent weather conditions have produced proof of this by showing an almost stationary condensation cloud trapped under an inversion layer producing precipitation within half a mile of the plant, exactly as i predicted to DECC. I trust the implications of this on plants used for shoreline management are known to you. Also, you state that Spalding will not flood, I have seen the Risk Assessment produced for Spalding Energy showing this to be the case yet they are incurring a massive cost by building the new station 8.5 meters above existing ground level, on a 40 year plant life. This does not seem to give credibility to your risk assessment. Would you like to comment? Generally, I view the policy options as a typical defeatist lowest possible cost option. If we can still find money for Trident replacement we have enough money to defend the coast.</p>	<p>The intent of the SMP is to set policy on how we manage our coastline against the threat of erosion and flood risk over a 100 year plan period. The current draft policy of 'Hold the Line' for PDZ1 recommends keeping pace with climate change which could see defences improved.</p> <p>Coastal flood risk from The Wash and tidal River Welland has been mapped for Spalding, and the tidal flood extent only reaches certain parts of the town. In order to assess local flood risk South Holland District Council (SHDC) have produced their Strategic Flood Risk Assessment which maps both tidal and fluvial flood risk from the River Welland. This demonstrates that Spalding is at risk from flooding. Your concerns about local planning matters would need to be addressed by SHDC.</p>
16	M J. O'Lone Sandringham Estate	08/01/10	<p>I am writing on behalf of the Sandringham Estate that owns a significant area of low lying land between Snettisham and the Wooton Marshes including part of the foreshore near Wolferton beach, including part of PDZ1 and PDZ2. The estate welcomes the conclusion that it is not realistic to cease the defence against tidal flooding. The estate assumes that the proposal will include responding to any increased threat of flooding by widening and raising the height of the sea wall and to do so it will be necessary to obtain suitable material to do this. In the past, it is understood that the material has been worked from the built up of silt in the green</p>	<p>The intent of the SMP is to set policy on how we manage our coastline against the threat of erosion and flood risk over a 100 year plan period. The current draft policy of 'Hold the Line' for PDZ1 recommends keeping pace with climate change which could see some defences improved.</p> <p>We acknowledge your comments about the maintenance of the sea banks and we can confirm that we will be shortly undertaking a review of the sea banks around this part of The Wash.</p>

			<p>marsh and would hope that this could be the case for any future work. This would reduce the need to 'import material'. While there could be a short term effect on the SAC and SSI, the excavations would be gradually filled up with silt. While it is noted that maintaining the shingle ridges as a flood line defence could be difficult beyond the short term, we do have grave concerns at the implications of failing to do so. Failure to maintain a sea defence in this area would: 1. Allow the sea to flood much of the low lying land between Kings Lynn and Snettisham, which is production agricultural land. 2.The large scale 'land use adoption' would have a detrimental effect on the landscape, bringing the caravans and chalets further inland into an open landscape. If buildings and caravans are to be moved at such enormous cost, it would only be realistic to move to land that was unlikely to flood in the future and by implication this would mean locating the development on to higher land in the area which will then become highly visible. 3. The RSPB's saline lagoons at Snettisham reserve would also be lost. 4. The water table is controlled by the pumping station at Wolferton, including the outfall of the River Ingol and any proposals to change the sea defences will need to include provision to maintain this facility. The Estate appreciates the opportunity of commenting on the plan and would wish to partake in any future discussion.</p>	<p>It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary. Where it becomes necessary to realign to provide a more sustainable sea defence to protect people and agriculture, opportunities will be taken to provide habitat replacement at the same time. By managing our sea defences in this way we are able to reduce the risk of failure and give confidence by providing a good standard of protection around The Wash.</p> <p>Through the SMP2 Action Plan we will inform key stakeholders of how they can play an important role in the development of future policy. You will be aware that for PDZ 2 we have set up a key stakeholder's sub-group at which you are represented by Mr Mark Robinson (landowner). The aim of the sub-group is to work together to address issues for the 2<sup>nd</sup> and 3<sup>rd</sup> epoch. The group had its first meeting on 18 November 2009, with representation from the Environment Agency, the Borough Council of Kings Lynn and West Norfolk, landowners, caravan park owners, beach bungalows associations, The Chamber of Commerce, parish councils and RSPB.</p>
17	Andrew Murray Hunstanton Civic Society	11/01/10	<p>General Observations: Hunstanton Civic Society is pleased that it has had the opportunity to participate in the consultation on this very important subject that has the potential to severely affect local ecology and livelihoods. The Wash is large (approx 615 sq. km.) and very special – it is the largest estuary system in the United Kingdom with 5 rivers meeting the sea –the Steeping, Witham, Welland, Nene and Great Ouse. These rivers drain some 10% of the land area of England. It has the second largest area of inter-tidal mud flats and sand banks that are nationally and internationally recognised as important habitats for birds and other wildlife. We welcome the honesty in the narrative that in many aspects there is insufficient data to make accurate predictions and therefore careful scientific monitoring will be part of the planned SMP actions. Climate Change: Even though England is gripped by a prolonged cold spell at present, the scientific evidence suggests that for whatever reason, the world is getting warmer and the likelihood of storms is increasing. The warming of the seas leads to expansion whilst the melting of glaciers adds further to the volume of seawater. The Department of the Environment forecasts indicate that the sea level will rise in the near future by about 4 mm per year but that increases to 15 mm per year later in this century producing a total rise of some 1129 mm. by 2105. The fact that England is tilting and East Anglia is sinking adds to this problem. Flood Risk: In 2007, there was sufficient evidence of danger that the Cabinet's Emergency COBRA committee was convened. A flood disaster of the Fens was averted only when the direction of the wind changed and the water came to within 80 mm. of overtopping and perhaps of breaching the defences. This suggests that there is some urgency in finding ways of improving the defences not just maintaining their current levels. An in depth study of the actual flood risk has been done by Fabel and Maunsell but they conclude that: - "That because substantial improvements will be necessary to the Borough's tidal flood defences, both along the shores of the Wash and within the tidal outfall channel of the Great Ouse, to maintain the standard of flood defence throughout the Borough at its present level, the Borough Council makes vigorous and persistent representations to ensure that these improvements are made. These improvements should be implemented in a programme of works that will ensure that tidal defence standards</p>	<p>The current draft policy of 'Hold the Line' for PDZ 1, 2 &amp; 3 recommends keeping pace with climate change which could see defences improved. The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years. In order to do this the plan sets out a number of principles. The specific ones that apply to your concerns are listed below.</p> <p><i>"To ensure that localised decisions do not affect the natural balance of the coastline and shoreline management elsewhere."</i></p> <p>Hunstanton cliffs are not defended and are therefore subject to natural erosion. The material eroded from the cliffs is a source of sediment which feeds the beaches along the frontage between Hunstanton and Snettisham Scalp. If the decision to prevent further erosion was taken we would need to look very carefully at the impact this would have on the remainder of the frontage and its importance as a beach holiday attraction.</p> <p><i>"To ensure that shoreline management recognises the character of the coastal landscape."</i></p> <p>The cliffs at Hunstanton are a significant landscape feature associated with the town. They are often used in information about the town to identify its character and interest. Any proposal to defend the cliffs would need to ensure that the visual character and environmental importance of the cliffs are maintained. This requirement would have to be balanced against the other objectives of the plan which include:</p> <p><i>"To ensure that shoreline management has regard to the historic environment" and ".....supports conservation and enhancement of biodiversity"</i></p>

		<p>are maintained at or above present (2008) levels and are not permitted to fall below present defence standards at any time in the coming hundred year period.”</p> <p>Observations about Policy Development Zone 1 – Gibraltar Point to Wolferton Creek: Flood defences in this area are essential to protect The Fens. This land, some 3855 sq. km is generally at or below the present mean sea level. It is drained by 4 rivers assisted by Internal Drainage Boards who maintain 6115 km. of water courses and 286 pumping stations. There are 96.5 km of coastal sea walls and 154 km. of fluvial embankments. It encompasses 11 districts, 4 counties, and 2 government office and development agency regions. In addition to being home to about half a million people, 88% of land in the fens is cultivated and makes up about 50% of the entire grade 1, most productive, farmland in England. 37% of all vegetables produced in England are grown in the rich fertile soils of the fens. Because of the importance of this area to the food supply of the country, the proposal to hold the existing line may not be good enough and will require significant expenditure to ensure that the line is held.</p> <p>Observations about Policy Development Zone 2 – Wolferton Creek to South Hunstanton: This area is less important for agriculture but more for local tourism. The large number of caravans and holiday homes may require to be relocated out of the severe flood risk zone. This will make it safer but less attractive to the holidaymakers who will have to travel to the beach and shoreline. It has been found that the Heacham shoreline is exposed to the most extreme wind and wave conditions in The Wash (Posford Duvivier 1996a). The sea defence is a shingle ridge (susceptible to being breached in a storm) backed by a grassed sea bank. The shingle ridge needs constant costly maintenance.</p> <p>Observations about Policy Development Zone 3 – New Hunstanton Town: The Borough Council of King’s Lynn and West Norfolk elected to take responsibility for sea defences consisting of the promenade and seawall along the Hunstanton sea front but has done little to meet the amended standards and requirements instituted by DEFRA in areas for which it is responsible. There is concern that some of the southern promenade that was built on landfill material may not be in a good state of repair at present. The levels of sand on the beach are maintained by timber groynes that trap the sand and reduce long-shore drift. Further work will need to be done to ensure that sand levels are such that the promenade cannot be undermined.</p> <p>Observations about Policy Development Zone 4 - Hunstanton Cliffs: This is currently the only area of The Wash that is completely undefended. The sandstone and chalk striped cliffs are very distinctive and are an important geological and landscape feature. Since the promenade was built in 1956, there appears to have been preferential erosion of the cliffs just to the North of the promenade. Because erosion is due to a combination of surface water seeping through the rock and wave action at the base of the cliffs, we do not think that erosion can be completely stopped. It would therefore seem prudent to investigate ways and means by which that rate of erosion may be decreased either by impregnating the rock structure or by protecting the base of the cliffs from the full force of the waves. The grass area along the cliff top linking the esplanade gardens with the lighthouse area is an important feature of the resort. The proposal to allow continuing erosion until the B1161 road is threatened is far from a satisfactory one. We recommend commencing action now whilst there is still some leeway.</p> <p>The Wash Tidal Barrier: Having heard Mr. Peter Dawe (The Wash Tidal Barrier Corporation plc) give a presentation on Tuesday 5th. January 2010, we consider that it is very short-sighted of the team to have dismissed this as one man’s vague idea and not to feature it in developing SMP policies. We consider the idea of a</p>	<p>Based on current information, it is not clear how significantly the cliff top will be affected during the first and second epochs i.e. up to 2055. The action plan arising from the SMP will include the need for on-going monitoring and review of the cliffs in order to establish the rate and impact of cliff erosion. In the meantime we will need to give consideration of what action, if necessary, could be taken to reduce the rate of erosion that would not impact on the Hunstanton to Snettisham beaches or the visual and environmental importance of these cliffs.</p> <p>As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme and a strategic review of PDZs 2, 3 and 4. This will enable us to understand in more detail how the coastline is reacting to sea level rise.</p> <p>Through development of the Action Plan we will inform key stakeholders of how we can work collaboratively to manage these issues.</p> <p>In early 2009 the Environment Agency invited Mr Dawe to give a presentation on The Wash Tidal Barrier to a small audience made up of flood risk professionals and environmentalists. His approach had not fully considered the impacts that a scheme of this magnitude would have on flood risk and the European designated site under the European Habitats Directive.</p> <p>Following his presentation we wrote to Mr Dawe confirming our position which in brief asked for a number of key areas to be addressed. When we receive the necessary information requested we will be able to assess the full implications this scheme may have upon The Wash and its coastline.</p> <p>Given the limited information available, the SMP Client Steering Group made a conscious decision not to include The Wash Tidal Barrier as an option in this SMP. With more information it could be considered in future revisions of the SMP.</p>
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18	Mr D Cooper	14/01/10	<p>The draft proposals mention 'managed re-alignment' as though it was a feasible proposition: however due to the shape of the Wash this will involve building and maintaining a longer line of defence in order to protect a smaller area of land. In fact it would be more sensible to move the defences forward in order to shorten the line (= decrease the maintenance cost) and increase the amount of land defended (= increase the value of the defence). As regards the areas currently used for caravan sites in the area between Hunstanton and Snettisham: these areas are much too low to be satisfactory for this use. It would be sensible to shut these sites on a rolling basis, raise the ground level by using it for landfill and resurface the area at 3 or 4 metres above its current level. This would ensure the safety of caravanners and give the sites a secure future, as well as buttressing the shingle bank frontage. It would probably turn a profit as well!</p>	<p>The intent of the SMP is to set policy on how we manage our coastline against the threat of erosion and flood risk over a 100 year plan period. The current draft policy of 'Hold the Line' for PDZ1, 2 and 3 for the first epoch recommends keeping pace with climate change which could see defences improved.</p> <p>It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary. Where it becomes necessary to realign to provide a more sustainable sea defence to protect people and agriculture, opportunities will be taken to provide habitat replacement at the same time. By managing our sea defences in this way we are able to reduce the risk of failure and give confidence by providing a good standard of protection around The Wash.</p> <p>The Wash sea defences currently protect in excess of 200,000 Ha of grade1&amp;2 agricultural land. As part of the continued coastal protection we rely heavily on sediment being transported down the coast which is deposited in The Wash and helps our foreshores to grow. Our foreshores are an important flood defence measure and we rely heavily on their presence to reduce water depth, reducing wave energy and wave height</p>

				<p>from attacking the defences. As a result of climate change and sea level rise we may see our foreshores disappear, which will impact on the stability of our sea defences and increase the risk of failure as they suffer greater attack from the sea.</p> <p>With regards to your comments about the caravan site; as part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme and a strategic review of PDZs 2, 3 and 4. This will enable us to understand in more detail how the coastline is reacting to sea level rise. Through development of the Action Plan we will inform key stakeholders of how we can work collaboratively to manage these issues.</p>
19	Mr K L J Vines South Holland Internal Drainage Board	05/01/10	<p>As Engineer to the Board, I make this response on behalf of the South Holland Internal Drainage Board, whose districts Wash frontage extends from Fosdyke to Sutton Bridge. This therefore falls entirely within policy development zone 1 (PDZ1), and as such this response is only pertinent for that policy development zone. Firstly, the Board fully support the proposed intent of management for PDZ1 to “sustain flood defence for the communities and their hinterland in the low-lying areas around the Wash. This includes an increase of management as needed to sustain the current level of flood risk in the face of climate change”, although a specific mention of high grade agricultural land would be welcomed here as in recent years the resoluteness for protecting agricultural land has been questionable, and if its importance at both a local and national level is now recognised it would avoid any ambiguity if it were mentioned specifically. Also the Board fully support the intention to hold the existing sea bank alignment in Epoch 1. However there are concerns that this is only relevant for the next 15 years until the beginning of Epoch 2 in 2025, when this could change. I appreciate that changes may occur in the Wash over time that may alter the amount of accretion or erosion that is occurring, but a more long term commitment is necessary if people living or working in the area are to feel secure about their future. This Board are making long term plans for the next 50 to 100 years regarding their infrastructure along the coastal frontage and this will be difficult to justify when there is only a short term commitment in place from the Environment Agency. When will the decision be made regarding Epoch 2 and what evidence will be used to justify the decision? Surely, if managed re-alignment is to be an option then those affected would require considerable notice. The Board currently maintain three pumping stations and two tidal sluices on the first line sea bank and any re-alignment of the defences would have a significant impact on the drainage infrastructure that is currently in place. As the Wash is still currently accreting and there is no reason to suggest that it will not continue to do so in the near future, and any sort of managed retreat will require several years worth of planning and notice to affected individuals and organisations, and as the beginning of Epoch 2 is only 15 years away, surely it is reasonable to state at this time that the existing line will be held in Epoch 2 (2025 to 2055) and that the feasibility of this, due to changing conditions in the Wash, will be researched and considered through Epoch 2 for possible changes in Epoch 3 (2055 to 2105). Thirdly, second line sea banks, or historic defences, are mentioned in the plan but given little importance. Along the South Holland coastal frontage there are reasonably intact lengths of second line bank and the Board currently maintain 15 second line sluices on these banks which can be sealed in the event of a first line breach to prevent the ingress of flood water further inland. Although the presence of these second line banks is</p>	<p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years. In order to do this, the plan sets out a number of principles, the specific one that applies to your concern is listed below.</p> <p><i>“To ensure that shoreline management supports the continuation of sustainable patterns of development and considers possible effects on communities and their welfare”.</i></p> <p>The draft SMP has been developed, taking into account the importance and contribution of the land protected by The Wash defences to UK food production and food security, being a key welfare concern.</p> <p><b>Hold the Line</b></p> <p>The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability and provide opportunities to replace the loss of habitat under current legislation. All SMPs are required to work to current legislation, however, if government priorities change, then future SMPs will review their policies.</p> <p>The Wash sea defences currently protect in excess of 200,000 Ha of grade 1&amp;2 agricultural land. As part of the continued coastal protection we rely heavily on sediment being transported down the coast which is deposited in The Wash and helps our foreshores to grow. Our foreshores are an important element in flood defence and we rely heavily on their presence to reduce water depth, reducing wave energy and wave height which attack the defences. As a result of climate change and sea level rise we may see our foreshores disappear, which will impact on the stability of our sea defences and increase the risk of failure as they suffer greater attack from the sea.</p> <p><b>Secondary defences</b></p> <p>The Environment Agency's investment priority is to maintain the current strategic coastal defence line and therefore we do not invest in any former</p>

			<p>probably localised in terms of the plan as a whole, it is suggested that the location and extent of these banks should be recorded by the Environment Agency and these banks be assigned a purpose, and although not actively maintained more effort should be made by the Environment Agency to ensure they are not degraded any further. With regard to environmental mitigation measures, the Board feel that any loss of environmental feature should be compensated for within the boundary of the management plan in which the loss has occurred and that there should not be any importation or exportation of environmental mitigation measures from or to any other parts of the country, i.e. environmental mitigation measures should only take place within the Wash Shoreline Management Plan area to compensate for losses which have occurred within this area and not to compensate for losses that have occurred elsewhere. In summary then, the Board support the proposed intent of management for PDZ1, although a specific mention of the importance of protecting high grade agricultural land would be welcomed. The Board support the intention of holding the existing sea bank alignment in Epoch 1 but would like to see this level of firm commitment extend in to Epoch 2 due to the comparatively short term commitment displayed in the draft plan and that changes are unlikely to occur in the Wash before the end of Epoch 1. The Board feel that second line sea banks should be investigated in more detail and given more importance where they are still intact, and given better protection by the Environment Agency against future damage and degradation, either under existing powers, or possibly through new powers to designate and protect such structures which may arise from the Floods and Water Management Bill. The Board are opposed to the importation or exportation of environmental mitigation measures from one part of the country to another and feel that environmental mitigation measures should only take place within the Wash SMP area for losses that have occurred within the Wash SMP area, and vice versa.</p>	<p>relic lines. We acknowledge that in an event today, the relic line would serve a benefit but to what degree is debatable due to size, condition, location etc.</p> <p>The benefits that relic lines may have in the future needs to be further explored and the SMP Action Plan includes an item to do this. As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme for PDZs 1, 2, 3 and 4, which will enable us to understand in more detail how the coastline is reacting to sea level rise.</p> <p>We acknowledge your support for the emerging policies from The Wash SMP2 and confirm that through the development of the SMP2 Action Plan we will inform all key stakeholders of how they can play an important role in the process.</p>
20	Mr J Jones Norfolk County Council	13/01/10	<p>This SMP sets out a framework for managing the coastline which aims to identify the best ways to manage coastal flood and erosion risk to achieve the best possible balance in protecting, people, property and wildlife. Officers, in considering the draft Plan, welcome a number of the key principles which guide this approach: The Environment Agency, in drafting the Plan, has recognised that a precautionary approach is needed. Making clear that policy proposals leading, in many cases, to irreversible changes need to be carefully considered with decisions based on agreed evidence, including best science but also the potential wider socio-economic impacts. The Plan recommends a cautious 'no regrets' approach, based on current knowledge and understanding. Aiming to avoid compromising future decisions and properly addressing the need to take informed decisions where changes may lead to irreversible losses. The Plan also acknowledges that the impacts of climate change on sea level rise and natural processes are impossible to predict over the longer term with any degree of accuracy at present; and that the natural processes which help to shape and change the coast are dynamic and very complex. These uncertainties, combined, require a pragmatic and cautious approach, and the underlying principle of taking the right decisions, at the right time through collective agreement is supported. However it is suggested that the phrase "no regrets" is open to different interpretations and should not feature in the final version of the SMP. This cautious approach, reinforced by such terminology, could give the impression that there is time and no sense of urgency. Given the likelihood of flooding around some parts of the county's coastline, this could prove to be a most unfortunate expression if floods leave large residential areas under water. It is helpful that the Plan acknowledges the importance of, and seeks to identify</p>	<p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years.</p> <p>We acknowledge your support for the emerging policies from The Wash SMP 2 and your advice offered on several issues.</p> <p>Referring to your comments in section 2.14 to 2.15 of your response, in a meeting with the Norfolk Landscape Archaeology, English Heritage, Environment Agency and yourselves, held on Wednesday 3 February 2010, these issues were resolved with text changes to the SMP document and actions identified in the Action Plan.</p> <p>Also, as you advised in section 2.16, through the development of The Wash SMP2 Action Plan, we will continue with our coastal monitoring. This will provide us with better information and enhance our understanding of how the coastline is reacting to sea level rise, allowing the appropriate action to be taken in the future.</p> <p>Your concern about the use of term "no regrets" has been fully debated at the Client Steering Group and the agreed position is to continue with the use of the term.</p> <p>With regard to the Coastal Access Bill, we will recommend to the CSG about its inclusion within the SMP Action Plan.</p>



			<p>opportunities for, partnership arrangements and joint working to deliver improvements. But much depends on the outcome of the consultation exercise and the flexibility and willingness shown in adapting the Plan to deliver local solutions in response to local knowledge and opinion. The engagement process needs to build confidence, without which it will be very difficult to build consensus and agreement around a longer term vision for the coast. The SMP provides the means of opening a debate about how best to plan over time for change, rather than react to events. The timescales involved should allow sufficient time to grow understanding and gradually adapt the way we view and manage coastal defences. The cyclical nature of reviewing and updating SMP's before they reach the end of the first epoch also ensures that this Plan will not run on into actions proposed for the medium to long term without subjecting these policies to further scrutiny and public consultation. Overall its suggested that the principles of this measured approach should be cautiously supported. Development of policy in this Plan, through partnership working involving stakeholders in a Client Steering Group and an Elected Members Forum, is the right approach and that this level of engagement leading through to a consultation process that seeks to engage with local interests to help further inform policy and deliver local solutions is also supported. This Plan, covering about 80 kilometres of coastline from the river Steeping at Gibraltar Point in Lincolnshire to the Hunstanton Cliffs in Norfolk, is divided into four units, called Policy Development Zones (PDZ). To aid the consultation exercise a Non Technical Summary provides a very helpful and straightforward overview of the SMP. Describing in clear terms how the four PDZ units play an important part in developing the Plan because the coastal processes within each work differently and have distinctive characteristics, values and land uses. Key messages are also well communicated and importantly the Plan states unambiguously its primary aim of identifying the best ways to manage coastal flood and erosion risk to achieve the best possible balance in protecting people and their interests and the environment. All four Policy Development Zones: PDZ 1, 2, 3, and 4 relate to Norfolk's coastal frontage in the Wash, though a significant proportion of PDZ 1 is within Lincolnshire. In broad terms this Plan includes sea bank defences which, between Gibraltar Point and Kings Lynn, separate internationally important salt marsh and mud flat habitats from extensive areas of low lying regionally and nationally important agricultural land. In contrast the eastern shoreline of the Wash from Kings Lynn to Hunstanton the sea defences protect land uses more focused on tourism and comprise a narrow band of shingle ridge backed by a sea bank giving way as the land rises into cliffs around Hunstanton, with additional protection afforded by promenade and a sea wall in the town itself. The SMP recommends no policy changes for all four PDZs in the short term (now to 2025), and this is welcomed. Holding the line in PDZ 1, 2 and 3 and allowing the cliffs to continue to erode naturally in PDZ 4 will allow time to monitor and evaluate the technical, economic and environmental issues and develop better informed responses for the medium (2026 to 2055) and longer term (up to 2105). However within PDZ 2, Wolferton Creek to South Hunstanton, the hold the line policy does not remove the existing concerns about risk to life. It is a matter of deep concern that because the current defences in this area offer a relatively low level of protection there is already a significant risk of flooding during parts of the year which would affect a large number of people and their property. This is clearly highly undesirable and with the prospect of needing to plan for land use adaptation during the first epoch (short term) the intent of management proposed for this PDZ, is to establish a process of cooperation with local stakeholders. The formation of a</p>	
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21	Mr M. I. Robinson Robinson Farms (Carbrooke) Ltd.	14/01/10	<p>I am writing to you, following our meeting at Hunstanton on the 11th January, to formally express my concerns with regard to the PDZ2, as owner of a significant area of land between the current sea bank and the A149 i.e. the landward edge of the Environment Agency Flood Zone. Whilst accepting that not all can remain as is forever, especially in view of climate change, I am concerned with regard to the effect of failing to hold the shingle ridge as a flood defence. 1. The loss of the defence would result in the relocation of buildings and caravans site at enormous cost. Unless the policy is to then hold the line at the sea bank these sites would have to be moved off the flood plain far back beyond the A149. The movement of them into a completely different area would render them highly visible in conflict with current residential use. 2. The RSPB area at Snettisham will disappear 3. Provision for continuing use of the Wolferton pumping station will have to be made. 4. A large area of good agricultural land will become inundated from Snettisham to beyond Wolferton – and is likely to creep round the back of the areas behind PDZ2.</p>	<p>The intent of the SMP is to set policy on how we manage our coastline against the threat of erosion and flood risk over a 100 year plan period. The current draft policy of 'Hold the Line' for PDZ1 recommends keeping pace with climate change which could see some defences improved.</p> <p>It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary. Where it becomes necessary to realign to provide a more sustainable sea defence to protect people and agriculture, opportunities will be taken to provide habitat replacement at the same time. By managing our sea defences in this way we are able to reduce the risk of failure and give confidence by providing a good standard of protection around The Wash.</p> <p>Through the SMP2 Action Plan we will inform key stakeholders of how they can play an important role in the development of future policy. You will be aware that for PDZ 2 we have set up a key stakeholders sub-group at which you represent the landowners. The aim of the sub-group is to work together to address issues for the 2<sup>nd</sup> and 3<sup>rd</sup> epoch. The group had its first meeting on 18 November, 2009, with representation from the Environment Agency, the Borough Council of Kings Lynn and West Norfolk, landowners, caravan park owners, beach bungalows associations, The Chamber of Commerce, parish councils and RSPB.</p>
22	Nick Tribe Natural England	14/01/10	<p>Thank you for consulting Natural England over the above. We have confined our comments to the certain of the Appendices namely: Main SMP document (Annex A),</p>	<p>You commented on the need to modify the policy wording for PDZ2 Wolferton Creek to South Hunstanton in order to make it compatible with</p>

			<p>H - Economic review (Annex B), K - Water Framework Directive (Annex C), L - Strategic Environmental Assessment (Annex D) M - Appropriate Assessment (Annex E). Natural England supports the Wash SMP as the document is in line with the overriding principle of sustainable development, i.e., the economic, social and environmental aspects have taken into account. The policies contained within the SMP reflect the fact that there is significant uncertainty surrounding the future coastal evolution of the area in the face of sea level rise and the likely changes in weather patterns. Of our comments in the Annexes, we draw attention to: 1. The need to modify the policy wording for PDZ2 Wolferton Creek to South Hunstanton in order to make it compatible with PDZ1 as we believe that the issues affecting both frontages are the same; 2. Our qualified support for the Hold the Line policy for PDZ4 Hunstanton Cliffs as we would be likely to object to any project that led to the features of interest of this geological SSSI falling into unfavourable condition. We note that various of our comments made in September 2009 on the draft Strategic Environmental Statement and Appropriate Assessment do not appear to have been taken into account. <b>See Appendix 1 for details.</b></p>	<p>PDZ1 as you believe that the issues affecting both frontages are the same. You also stated your qualified support for the Hold the Line policy for PDZ4 Hunstanton Cliffs as you would be likely to object to any project that led to the features of interest of this geological SSSI falling into unfavourable condition.</p> <p>At the Client Steering Group meeting of 4 February, 2010, it was agreed that the modification to the policy wording for PDZ2 as you requested would be incorporated. The CSG also noted your comment on PDZ4 and related it to the concerns from the local residents and English Heritage, on the need to protect the cliff top against erosion. However, it has been agreed that the text will be expanded to reflect all issues raised, and the action plan will identify the need to address the issue in the coming years, ideally through an integrated strategy with PDZs 2 and 3. All other comments and proposed amendments as outlined in Annexes A, B and C of your response will be incorporated. We hope to resolve the issues raised in Annex D (Strategic Environmental Assessment) and E (Appropriate Assessment) directly with you, while finalising the documents.</p>
23	Judith Stoutt Eastern Sea Fisheries Joint Committee	13/01/10	<p>Role of Eastern Sea Fisheries Joint Committee: I am responding on behalf of Eastern Sea Fisheries Joint Committee. The Joint Committee is responsible for managing inshore fisheries within six nautical miles of the coast, including estuaries, of Lincolnshire, Norfolk and Suffolk. The Joint Committee's remit includes the management of specific molluscan shellfisheries in The Wash, under The Wash Fishery Order 1992, but excludes management of fisheries in the private Le Strange fishery on the eastern edge of The Wash. Our observations on this draft plan reflect our duties to protect, regulate and develop these fisheries, whilst ensuring they operate in a sustainable manner that accounts for the environmental sensitivities of the area. The Joint Committee endeavours to highlight to potential developers, regulators or policy makers the commercial and recreational fisheries that take place within an area, and the sensitivities of those fisheries. Where proposals have the potential to impact estuarine or coastal waters or seabed habitats, the Joint Committee suggests that the regulators consider the potential impacts of proposed strategies on dependent local or migratory fish and shellfish populations, either directly or via ecological processes that affect them. The Wash Fisheries: The Wash is a particularly important area for fisheries within the ESFJC District, in socio-economic as well as ecological terms. The estuarine habitats are important nursery grounds for many commercial fish species, and intertidal mudflats support huge populations of invertebrates, including the commercially targeted cockles and mussels. The Wash supports a relatively high level of fishing effort (primarily targeting brown shrimp, cockles and mussels) returning high landings values and supporting coastal fishing communities in Lincolnshire and Norfolk. In recognition of the ecological importance of the Wash, the Joint Committee directs a high level of resources towards achieving sustainable fisheries in balance with the area's conservation requirements. For example, the Joint Committee has developed shellfishery management policies in collaboration with Natural England and members of the fishing industry, to ensure compatibility of fisheries management with the conservation objectives for the Wash. The fisheries under the Joint Committee's direct management are routinely assessed in conjunction with Natural England before being allowed to take place. Potential impacts on shellfisheries: There appears to be some ambiguity over the potential for shoreline management processes to affect shellfisheries in The Wash. In many sections of the report and its</p>	<p>We acknowledge that the Joint Committee considers that shellfish farmers (lay holders) should be made aware of the SMP proposals and provided with an opportunity to input to decision-making, specifically where their interests could be affected.</p> <p>Through the development of the SMP2 Action Plan we will inform key stakeholders like yourselves, of how they can play an important role in the process.</p> <p>With reference to your comments in table 1, we have incorporated your suggested changes to the main document and are considering your suggested changes to the Appendices. Any text changes will be agreed with our Client Steering Group.</p>

			<p>appendices, the importance of the Wash shellfisheries is noted, and the need to take these into account is recognised. This is in keeping with SMP principles, e.g. 5 “to ensure that shoreline management supports the continuation of sustainable patterns of development and considers possible effects on communities and their welfare”; and 7 “to ensure that shoreline management supports the sustainable provision of the social and economic values of the area to the wider society”. Shellfisheries are dependent on a number of natural factors including available intertidal habitat, water quality, food availability and so on. The potential for significant changes in intertidal areas as a result of shoreline management activities (and sea level rise) could affect shellfisheries. However, shellfisheries were omitted from consideration in the Strategic Environmental Assessment of the SMP: Annex II of the SEA document outlines the response to Natural England’s suggestion that the SEA should have regard to the existing shellfishery, stating it was later agreed that no pathway had been identified for SMP policy to affect shellfisheries. The Joint Committee would request clarification that the potential for impacts on shellfisheries in the Wash is appropriately considered. Private lay holders: A small proportion of the intertidal mudflats in the Wash is privately leased from The Crown Estate (via the Joint Committee) by shellfish farmers for mussel cultivation. Despite the relatively small area used for mussel cultivation, the mussel fishery in the Wash is hugely dependent on this cultivation capability. Although uncertainty over future scenarios is significant, there is potential for significant changes to intertidal mudflats and offshore banks upon which the shellfish lays (marine allotments) are located. The Joint Committee considers that shellfish farmers (lay holders) should be made aware of the SMP proposals and be provided with an opportunity to input to decision-making, specifically where their interests could be affected. <b>See Appendix 2 for details.</b></p>	
24	Mr P. Bateson Witham Fourth District Internal Drainage Board	13/01/10	<p>The Boards comments are limited to the shoreline stretching from Wainfleet Sand down to the Haven outfall. The Board has a vested interest in the proper management of the shoreline that protects their district which covers over 40,000 hectares north of the River Witham, in and around Boston. The Board maintains a 700km network of drains within this area that drain the fenland, protecting both rural and urban property from the risk of flooding. Much of the Boards district is below sea level and the lowest lying area is at the top of the district, far away from the River Witham. A tidal breach would be catastrophic for this area which would inevitably be a repository for overtopping flood water. The Board is committed to protecting the district from flood risk and is keen to have input into this and future SMPs. The Board strongly supports the policy appraisal objectives on page 13 of the SMP2, in particular, the importance placed on urban communities and agriculture, and the balance to be achieved with the other objectives. The Board are also pleased with the conditional nature of the plan which sensibly allows for future decisions to reflect the circumstances evident when those decisions are taken. Flood protection: The SMP2 does not identify the important difference between the flood protection and habitat consideration in normal tidal conditions and the very different conditions that a high tide and storm surge would bring. Flood protection for a 1:200 event means being able to withstand such an event and flood defences need to be able to withstand the high level water that such a surge would bring. The SMP2 should make it clear for each aspect of the plan, which condition is being referred to. There is also a lack of recognition of the actual current level of the coastal flood defences. Although a 1:200 level is the objective, a 1997 report by Halcrow for the Environment Agency highlights that significant parts of the bank do not have a 1:200</p>	<p>Through the development of the SMP2 Action Plan we will inform key stakeholders of how they can play an important role in the process. It has been confirmed, following the Client Steering Group meeting of the 4<sup>th</sup> February that Hugh Drake will represent the interests of the Lincolnshire IDBs.</p> <p>The figures provided for realignment only looked at construction costs of defence works and did not take account of associated works that may be necessary to deliver a full scheme. Your point about the potential need for adaptation of drainage infrastructure is well made, and we propose to add text to the main document to highlight this and ensure it is taken into account in the next steps in line with the Action Plan.</p> <p>The intent of the SMP is to set policy on how we manage our coastline against the threat of erosion and flood risk over a 100 year plan period. The current draft policy of ‘Hold the Line’ for PDZ1 recommends keeping pace with climate change which could see defences improved.</p> <p>We will consider all other comments and agree text changes with our Client Steering Group.</p> <p>Please be assured that the impacts of neighbouring SMPs, for both North Norfolk and HECAG, have been considered against The Wash SMP.</p>

			<p>year standard. Finally the River Witham CFMP policy for fluvial flood risk in the areas behind the sea defences is to maintain existing levels of protection taking into account climate change. The SMP should do nothing to compromise this position. The role of IDBs in the SMP preparation: There are 4 IDBs in PDZ1 including the Witham Fourth Board. However, there does not appear to have been a proper input from IDB's during the preparation of the SMP2. The Water Management Alliance only covers part of PDZ1 and the views of all IDBs should be taken into account as they have a long history of competent water level management. IDBs are one of the five Risk Management Authorities working with Lincolnshire County Council in their role as lead flood authority under the new Floods and Water Management Bill. They will ultimately have responsibility for flood risk in Lincolnshire and recognise the important role IDBs play. IDBs should be seen as a real partner in the SMP development, particularly as they collect local rates from local ratepayers, which could help to support the SMP2 objectives. This Board would welcome the opportunity to support the development of the SMP2 as it moves to SMP3 over the next decade as our district makes up around the one third of the SMP area. Appropriate Coastline management: The shoreline bordering the Board's district all falls within PDZ1. The Board are pleased that the policy for this zone seeks to maintain the current level of flood risk protection. Recognising the effects of climate change, this will necessitate an improvement of the current defences, particularly where existing defences do not currently meet the 1:200 year level of protection. During Epoch 1, the foreshore is expected to continue to accrete and is not until the medium and long - term time frames where the real decisions will be taken regarding holding the line, managed retreat or realignment. The Board's view is that a cost benefit exercise would show that it is preferable to build on existing front line defences, rather than retrenching inland to do the same realignment. A major gap in the SMP2 is the lack of a holistic view of possible financial consequences of realignment. A realigned shoreline could necessitate a serious re-engineering of the drainage infrastructure, built up in the last 300 years, that sits behind it. This could include the relocating of some or all of the 4 coastal pumping stations in the Board's district, together with channel widening and other fluvial considerations. The costs of such works would be considerable and would impact on local drainage rates. Any relevant subsequent capital costs incurred by W4th IDB in such realignment would, we believe, have to be borne by DEFRA. If a figure of £1m per kilometre has been assumed for realignment, then this would necessitate a capital cost of £70m. I estimate that the capital cost of rebuilding 4 pumping stations would mean an additional £50m to the costs of re-engineering the fluvial model for the reduced district. This reaffirms the Board's view that building on the current frontline of sea defences is the most appropriate policy for SMP2. The SMP2 is understandably focused on The Wash alone. The accretion versus erosion debate cannot be held in isolation of other SMPs where, for example continued erosion may lead to greater accretion of The Wash shoreline. The SMP2 needs to consider the implications of SMPs impacting on The Wash. Other comments: Flood risk has a detrimental impact on Boston's ability to attract investment and therefore, the future prosperity of its people and the business community. The local economy has many sectors and agriculture is just one of them but the significance of the Fens to the local economy and the UK's food security cannot be stressed enough. It was pleasing to see Hilary Benn Mp highlight this at the recent Oxford Farming Conference. The SMP2 should not advocate a policy that puts the economic stability of Boston at risk. <b>See Appendix 3 for further details.</b></p>	
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25	Mr Peter Jermany Borough Council of Kings Lynn and West Norfolk	14/01/10	Thank you for consulting the Borough Council on this document. The Council's Cabinet considered the above document at its meeting on 12 January 2010. The Cabinet resolved: That the Environment Agency be informed that: 1) the approach to the preparation of the draft Wash Shoreline Management Plan and the draft policies therein are supported; 2) the approach to stakeholder engagement with regard to the joint development of a coastal defence solution for the frontage from Snettisham to Hunstanton is welcomed and supported.	No formal response required. Response would be picked up from the consultation report/schedules.
26	Mr S Williams South Holland District Council	14/01/10	<p>Thank you for the opportunity to comment on the Wash SMP. South Holland DC has the following comments to make: The Council reinforces its support for the Draft SMP's policy intention of hold the line for PDZ1 (i.e. from Gibraltar Point to Wolferton Creek, north of King's Lynn) for at least the first epoch to sustain flood defence for the communities and their hinterland in the low-lying areas around the Wash, which includes an increase of management as required to sustain the current level of flood risk in the face of climate change. The SMP should be seen in the context of other plans and studies which deal with flood risk likely to affect South Holland. In particular, our own Strategic Flood Risk Assessment has recently been significantly revised and updated and this should be recognised in the SMP. A lot of work has also been undertaken on the Lincolnshire Coastal Study. This covers the same general area as the Wash SMP together with the Flamborough Head to Gibraltar Point SMP and it is important that co-ordination between the Study and the SMPs continues. The 'Appropriate Assessment' which considers the likely impact of the SMP on the Wash European Marine Site, was completed after the public consultation was commenced. At present, this does not appear to be leading to any significant changes in the SMP but we will continue to monitor this very carefully, together with any reference to the Habitat Regulations to ensure that a proper balance is maintained between wildlife, agriculture and other social and economic factors. It is the view of elected Members that any changes brought about by the Habitats Regulations should not compromise present/existing development. Some comments have been made about the so-called secondary defences. These are the remains of old defences which became redundant when land in front of them was reclaimed. Although they may not carry out any real flood defence function now, they should be reviewed to assess their viability for any future use as soon as possible which is in accordance with the later meetings of the SMP Review Group. The Council generally supports the proposals but we attach significant importance: to ensuring adequate ongoing monitoring and research that will inform sound predictions of intertidal developments and understanding of the impact of foreshore loss and gain on flood defence and habitats and, consequently, enable any important decisions on the need for any landward realignment of defences (and the consequences of such action on local communities) to be made as early as possible; and to the retention of high-quality agricultural land (grades 1 and 2) in South Holland in planning for any necessary landward realignment. The loss of grade 1 and 2 agricultural land should only be considered in exceptional circumstances.</p>	<p>We acknowledge your support for the emerging policies from The Wash SMP 2 and your advice offered on several issues.</p> <p>The Wash SMP recognises the Lincolnshire Coastal Study, which provides the framework for land use planning and has combined the Environment Agency's flood hazard maps and your Strategic Flood Risk Assessment.</p> <p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years. In order to do this, the plan sets out a number of principles, the specific one that applies to your concern on food security is listed below.</p> <p><i>"To ensure that shoreline management supports the continuation of sustainable patterns of development and considers possible effects on communities and their welfare".</i></p> <p>The draft SMP has been developed, taking into account the importance and contribution of the land protected by The Wash defences to UK food production and food security, being a key welfare concern.</p> <p>It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary. Where it becomes necessary to realign to provide a more sustainable sea defence to protect people and agriculture, opportunities will be taken to provide habitat replacement at the same time. By managing our sea defences in this way we are able to reduce the risk of failure and give confidence by providing a good standard of protection around The Wash.</p> <p>The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability and provide opportunities to replace the loss of habitat under current legislation.</p> <p>The Wash sea defences currently protect in excess of 200,000 Ha of grade 1&amp;2 agricultural land. As part of the continued coastal protection we rely heavily on sediment being transported down the coast which is deposited in The Wash and helps our foreshores to grow. Our foreshores are an important element in flood defence and we rely heavily on their presence to reduce water depth, reducing wave energy and wave height which attack the defences. As a result of climate change and sea level rise we may see</p>

				<p>our foreshores disappear, which will impact on the stability of our sea defences and increase the risk of failure as they suffer greater attack from the sea.</p> <p>The intent of the SMP is to set policy on how we manage our coastline against the threat of erosion and flood risk over a 100 year plan period. The current draft policy of 'Hold the Line' for PDZ1 for the first epoch recommends keeping pace with climate change which could see defences improved.</p> <p>The Environment Agency's investment priority is to maintain the current strategic coastal defence line and therefore we do not invest in any former relic lines. We acknowledge that in an event today, the relic line would serve a benefit but to what degree is debatable due to size, condition, location etc.</p> <p>The benefits that relic lines may have in the future needs to be further explored and the SMP Action Plan includes an item to do this.</p> <p>As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme which will enable us to understand in more detail how the coastline is reacting to sea level rise.</p>
27	Mr J Maiden Hunstanton Environmental Landscape Programme	14/01/10	<p>I would like to outline a proposal, which has the potential to save vast areas around The Wash from inundation by the sea, even if climate change causes sea levels to rise at the predicted rate over the next fifty years. Following the floods in 1953 an earth embankment was hastily constructed, running southwards from Hunstanton, to form a second line of defence in the event of another tidal surge. If a similar, but more robust embankment could be erected around The Wash it would have the following advantages: Materials for construction would have extremely low carbon emissions, because soil and subsoil adjacent to the embankment could be used in its construction, thereby reducing the need to transport building material for most of the engineering work from further afield. If this material is scraped from the seaward side of the embankment, the result of extraction could be the formation of lagoons providing habitat for sea birds, whilst on the landward side freshwater ponds could be created, to provide a haven for wildlife, including endangered amphibians as well as birds. In addition to providing a flood defence the embankment would enable the laying of a track, which could restore the Hunstanton to King's Lynn Railway, closed in May 1969, before the consequences of carbon emissions were properly understood. Similarly, the embankment could carry a railway from Lynn heading West towards Sleaford, thereby avoiding the rail journey south as far as Ely before turning towards Peterborough for the north and the midlands. Where the embankment came to roads and rivers, flood gates and sluices could be installed. Similar arrangement could be made to prevent flooding through tunnels in the embankment, which would be required to allow mammals to pass under the railway instead of over it. The Wash embankment might not have the benefit of generating tidal electricity, which is the promise of proponents of a Wash barrier scheme, but it would provide a better defence against the flooding of highly productive farmland, as well as protecting industrial and domestic property. The railway would cut carbon emissions by reducing the need for car journeys by commuters and tourists. I submit this proposal in the hope that it will be given serious consideration as a means of</p>	<p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years.</p> <p>We acknowledge the content of your proposal, ideas like this could be considered beyond the SMP, if it were clear that there is a need for defence improvement and habitat creation. This is not currently the case, but might be if we end up with an erosional scenario in epochs 2 or 3.</p> <p>However, through the development of The Wash SMP2 Action Plan, we will continue with our coastal monitoring. This will provide us with better information and enhance our understanding of how the coastline is reacting to sea level rise, allowing the appropriate action to be taken in the future.</p>



			<p>coping with the effects of climate change. The actual line of the embankment would depend on the number of acres of reclaimed land around The Wash that might have to be surrendered back to the sea as un-drained salt marsh, which in itself provides protection from the worst effects of a tidal surge.</p>	
28	Cllr N Cooper East Lindsey District Council	14/01/10	<p>The policy implications for epoch 1 have been assessed in the document and these show that the “hold the line” option performs well against all of the relevant objectives for PDZ 1 with the obvious exception of the objective to have as little flood and erosion risk management throughout the plan period as possible. In terms of protecting communities, maintaining habitats, landscape and the historic environment, protecting higher quality agricultural land, avoiding interference with drainage functions, and retaining recreational access to the foreshore, the “hold the line” option is the most constructive of all the options and the one the Council supports. The hold the line option is deemed appropriate at least until 2055 because accretive forces continue to marginally outweigh erosive forces in this part of the Wash. For example, the Wash has acted as a sink for coastal sediment washed down from the north that, together with the silting from slow moving river outfalls, has extended the intertidal mud flats, sand flats and salt marsh, which in turn, have reduced the ebb-tide flushing and erosion potential. Whilst the Council fully supports the “hold the line” policy for Epoch 1, it only broadly supports the policy approach proposed in the WASH SMP2 for Epochs 2 and 3. Should landward realignment be chosen in the future then there would be significant effects on the local community, environment and economy. Significant areas of Grade 1 agricultural land would be lost, terrestrial habitats would disappear and agricultural-based communities would be weakened because of the loss of traditional livelihoods. The Council would strongly emphasise that the Lincolnshire Coastal floodplain is vital in importance as a food producer; this goes further with its contribution to the nation's food security. The continued sustainability of East Lindsey's coastal settlements must be taken into account when considered coastal flood defences and agriculture, tourism, investment in skills and jobs are vital to the continued economic prosperity of East Lindsey. The importance of these assets cannot be underestimated and the continuation of East Lindsey as a viable economic place and space should be ensured by continued coastal protection. Any managed realignment must only be considered if monitoring, studies and irrefutable evidence is provided that justifies it and any site selection is considered only in conjunction and consultation with the Council and local stakeholders and the public. In accepting this recommendation the Council would strongly request that an early review of proposals for epochs 2 and 3 be undertaken with a view to creating greater certainty for the local communities, economy and environment. The Council would also like it acknowledged that in some areas around the Wash there are two lines of defence with privately maintained banking being the primary first line of defence and secondary EA maintained banking as the secondary line of defence, this needs to have proper consideration when determining the policies of each unit, particularly as the EA defences are not always maintained to as high a quality of standard as the secondary defences.</p>	<p>We acknowledge your support for the emerging policies from The Wash SMP 2 and your advice offered on several issues.</p> <p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years. In order to do this, the plan sets out a number of principles, the specific one that applies to your concern is listed below.</p> <p><i>“To ensure that shoreline management supports the continuation of sustainable patterns of development and considers possible effects on communities and their welfare”.</i></p> <p>The draft SMP has been developed, taking into account the importance and contribution of the land protected by The Wash defences to UK food production and food security, being a key welfare concern.</p> <p>The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability and provide opportunities to replace the loss of habitat under current legislation.</p> <p>The Wash sea defences currently protect in excess of 200,000 Ha of grade 1&amp;2 agricultural land. As part of the continued coastal protection we rely heavily on sediment being transported down the coast which is deposited in The Wash and helps our foreshores to grow. Our foreshores are an important element in flood defence and we rely heavily on their presence to reduce water depth, reducing wave energy and wave height which attack the defences. As a result of climate change and sea level rise we may see our foreshores disappear which will impact on the stability of our sea defences and increase the risk of failure, as they suffer greater attack from the sea.</p> <p>It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary. Where it becomes necessary to realign to provide a more sustainable sea defence to protect people and agriculture, opportunities will be taken to provide habitat replacement at the same time. By managing our sea defences in this way we are able to reduce the risk of failure and give confidence by providing a good standard of protection around The Wash.</p> <p>The Environment Agency's investment priority is to maintain the current strategic coastal defence line and therefore we do not invest in any former relic lines. We acknowledge that in an event today, the relic line would serve a benefit but to what degree is debatable due to size, condition, location etc.</p> <p>The benefits that relic lines may have in the future needs to be further</p>

				<p>explored and the SMP Action Plan includes an item to do this. As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme which will enable us to understand in more detail how the coastline is reacting to sea level rise.</p>
29	Mr S J Wheatley Central Regional Flood Defence Committee	07/01/10	<p>A workshop was held on 21 December 2009 for the Anglian (Central) Regional Flood Defence Committee to consider the draft Wash Shoreline Management Plan 2. Those Committee Members attending the workshop were taken to be representing the Committee, and they supported the management policies proposed for each of the four Policy Development Zones. Although it is acknowledged that the set of principles on page 1 of the Non-technical summary have been agreed among all the organisations involved in the process, the following amendments were proposed by the Committee Members. 1. The word “balance” should be replaced by “integrate”, to better reflect that it is not just a choice between flood and erosion risk management and the value of the features that it protects. 2. To add another principle that reads “To ensure that Operating Authorities do their utmost to secure the necessary funding and resource to deliver the plan.” 3. On the principles, we comment that the first two read more as overarching outcomes or objectives, and might be better presented as such.</p> <p>4. On the response to increasing risk from sea level rise – especially in the second epoch and beyond, we stressed the need to increase the range of responses to protect life and property beyond simply flood warning or a scheme, given the likely difficulty of generating a cost effective scheme – in particular, how assets might be migrated out of the area of risk. Other points: a. It should be made clear that the SMP does not guarantee future funding, particularly for PDZ2. b. The diagrams given in the Non-technical summary for PDZ1 (pages 12 and 20) are very useful, so it would be helpful if similar diagrams were given for the other PDZs. c. It was acknowledged that we are planning for uncertain scenarios, so that future proofing of management policies is important. d. Although concern was raised about the potential impact of higher tide/sea levels on the discharge of fluvial flows, it was acknowledged that this was unlikely to result in increased flood risk higher in the Great Ouse Catchment. e. It was noted that house insurance for properties at risk of flooding more frequently than 1 in 75 years would be uncertain under the current guidance from the Association of British Insurers. f. The positive response given by caravan site owners and holiday home owners to the situation for PDZ2, in their willingness to try to raise sufficient funding locally to achieve a Hold the Line policy, was welcomed. g. The need to show defences raised in a possible future scenario with accretion for PDZ1 (page 20 of Non-technical summary) is questioned, as accretion should provide a better foreshore buffer zone to protect these defences.</p>	<p>Your committee’s support for the management policies proposed for all four PDZs is welcomed. However, I acknowledge that one of your members subsequently raised an issue which, as you are aware, is being discussed with the RSPB.</p> <p>With regard to your committee’s proposal to amend and add to the <b>set of principles</b> as set out in section 1.4 of the main SMP document, this was discussed at the Client Steering Group (CSG) meeting on 4 February, 2010. The CSG thought it would not be appropriate for the principles to be revised at this stage in the process but on 26 March, 2010, will not recommend amendments.</p> <p>The items detailed in your <b>other points</b> are generally acknowledged. In particular I can comment on the following specific items:</p> <ol style="list-style-type: none"> <li>1. It should be made clear that the SMP does not guarantee future funding, particularly for PDZ2.</li> </ol> <p>The CSG discussed this issue at length and as a result the following statement was included in the introduction to the main document:</p> <p><i>This intent of management is mainly about managing the shoreline and its flood and erosion defences, but there is a strong relationship with social, economic and environmental activities and values around the shoreline. SMP policies are not therefore driven by flood risk management economics. They do, however, have to be realistic. This is especially relevant for the policies for the short term. Implementing SMP policies will require funding, which may be national, local and/or third-party funding.</i></p> <p>However, as a result of consultation feedback such as that of your committee, we intend to review the statement with a view to strengthening the message about funding requirements.</p> <ol style="list-style-type: none"> <li>2. The diagrams given in the Non-technical summary for PDZ1 (pages 12 and 20) are very useful, so it would be helpful if similar diagrams were given for the other PDZs.</li> </ol> <p>Cross sections (page 12) were developed for the whole area and feature in the main document. We will consider adding them to the Non-technical summary. The diagram on page 20 is meant as a replacement for the policy map that would normally be produced (but this is not possible due to the nature of the policy). Producing a similar diagram for PDZ2 would be difficult because the issue is more complex: the policies do not just depend on intertidal development, but on a wide range of issues, to be developed in the coming years.</p> <ol style="list-style-type: none"> <li>3. The need to show defences raised in a possible future scenario</li> </ol>

				<p>with accretion for PDZ1 (page 20 of Non - technical summary) is questioned, as accretion should provide a better foreshore buffer zone to protect these defences.</p> <p>This is true, but a better foreshore only provides protection against waves, it does not reduce water levels. We will change the figure to show more clearly that the required defence is lower with a foreshore than without a foreshore (but it is still likely to be higher than the current sea banks).</p> <p>We are currently developing the draft action plan which will incorporate information received through the consultation responses. This will be reviewed and endorsed by our Client Steering Group (CSG) and Elected Members Forum (EMF).</p>
30	Mr B L Orde King's Lynn Internal Drainage Board	12/01/10	<p>On behalf of King's Lynn Internal Drainage Board, I have been asked to provide comments on the above consultation document. The Board's district boundary is coincident with The Wash shoreline between the River Nene, within PDZ1, to the southern fringes of Hunstanton, where PDZ2 meets PDZ3. The Board has a pumping station at Wolferton, on the boundary between PDZ1 and PDZ2 and a sea outfall, through an EA maintained culvert, under South Promenade at Hunstanton towards the northern end of PDZ2. Other networks exist behind the sea defences north of the River Great Ouse, however these outfall into EA main rivers thence into the sea. Firstly, I should like to point out that I feel that the SMP should be a rolling strategy document, setting out the intentions for a minimum period of 25 years ahead of publication with guidance as to how it may change over the next 25 and following 50 years. The use of an arbitrary epoch ending in 2025, followed by staged guidance, does little to help people working and living behind the sea defences plan for the long-term. Part of the justification for infrastructure improvements is the length of time that these improvements will give the required benefits. If the Board justifies an asset upgrade on the strength that it will provide 40 years (or more) of protection against increasing rainfall and rising sea levels, we need to be reasonably confident that the area we are protecting is not going to be given up to the sea in the foreseeable future. I would also like to draw your attention to the recently published UK Food Security Assessment where concern is raised about Britain's need to improve and increase harvestable quantities to provide sustainability and resilience into the future. Clearly, planning for this need must include long-term aims for the protection of coastal arable (including reclaimed) land, and must give some strength to the argument for not ruling out further reclamation if accretion along the Lincolnshire and Norfolk coastline of The Wash continues. PDZ1: Bearing in mind the above, the intention to 'hold the line' until 2025 is supported but, if future incarnations of the document are going to continue to have a cut-off date in 2025, a decision on the Policy post-2025 must be made sooner rather than later to enable appropriate decision making and commitment of funding and resources. It is also noted that, whilst managed realignment is discussed for the future, there is little of substance with regard to maintenance, management and protection of the existing previous defences which, in some cases, would not currently provide a secondary protection if a breach in the main defence occurred. There is a requirement for a body to be identified with responsibility for recording the location and condition of these second line defences and the power and finances to ensure that they are maintained to a minimum standard. PDZ2: Previous comments, whether General or specific to PDZ1, can be reiterated with regard to PDZ2. However, additionally, strengthening the point made</p>	<p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years. In order to do this, the plan sets out a number of principles, the specific one that applies to your concern is listed below.</p> <p><i>"To ensure that shoreline management supports the continuation of sustainable patterns of development and considers possible effects on communities and their welfare".</i></p> <p>The draft SMP has been developed, taking into account the importance and contribution of the land protected by The Wash defences to UK food production and food security, being a key welfare concern.</p> <p><b>Hold the Line</b></p> <p>The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability and provide opportunities to replace the loss of habitat under current legislation. All SMPs are required to work to current legislation, however, if government priorities change, then future SMPs will review their policies.</p> <p>The Wash sea defences currently protect in excess of 200,000 Ha of grade 1&amp;2 agricultural land. As part of the continued coastal protection we rely heavily on sediment being transported down the coast which is deposited in The Wash and helps our foreshores to grow. Our foreshores are an important element in flood defence and we rely heavily on their presence to reduce water depth, reducing wave energy and wave height which attack the defences. As a result of climate change and sea level rise we may see our foreshores disappear which will impact on the stability of our sea defences and increase the risk of failure, as they suffer greater attack from the sea.</p> <p><b>Secondary defences</b></p> <p>The Environment Agency's investment priority is to maintain the current strategic coastal defence line and therefore we do not invest in any former relic lines. We acknowledge that in an event today, the relic line would serve a benefit but to what degree is debatable due to size, condition,</p>

			<p>above about the timescale of the Policy, the ageing pumping station at Wolferton is likely to require some significant expenditure to maintain the structure of both the building and the inlet &amp; outlet structures within the next few years. Some clearer guidance about post-2025 policies would be useful to gauge the requisite life of the works required. PDZ3 &amp; PDZ4: Whilst both these PDZs are outside the Board's District, the proposed Policies are fully supported.</p>	<p>location etc. The benefits that relic lines may have in the future needs to be further explored and the SMP Action Plan includes an item to do this. As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme for PDZs 1, 2, 3 and 4, which will enable us to understand in more detail how the coastline is reacting to sea level rise.</p> <p>We acknowledge your support for the emerging policies from The Wash SMP2 and confirm that through the development of the SMP2 Action Plan we will inform all key stakeholders of how they can play an important role in the process.</p>
31	Tim Venes Norfolk Coast Partnership	15/01/10	<p>Thank you for the opportunity to comment on the draft SMP. I found the draft plan to be a clear and helpful description of the proposals for the future of this section of coastline and how these have been arrived at. The SMP is clearly very relevant to the Norfolk Coast Area of Outstanding Natural Beauty, covering the western part of its area. I regret that time constraints prevented my involvement in development of the plan, but I hope the following comments will be helpful. I recognise the uncertainties and lack of reliable information to underpin long term decisions for the plan. This has inevitably led to a plan with relatively clear short term policies in general, but less clear medium and long term policies. The action plan is therefore particularly important, as it will need to detail how and to what timetable the understanding is developed to reduce the uncertainties and firm up future options before the next plan review if possible. Will there be public consultation on a draft action plan as it is developed? No Regret policies: The term "no regret policies" is used in the document, with the definition of the term given as "Policies that don't have irreversible negative implications." Discussion on the finalisation of the Kelling to Lowestoft SMP has highlighted the fact that many people find the phrase inappropriate and even provocative, and would be unlikely to recognise the definition for some potential scenarios that may represent the most sustainable option. It may be worth considering a less potentially provocative phrase and definition, for example "retaining options policies". Principles I support the principles used in plan development (1.4, p12). PDZ1: I appreciate the wish to maintain defences in their present position, and uncertainties about how mudflats and saltmarsh will respond over time. However, I think an additional factor has been missed, or at least not given sufficient prominence, in the draft plan. As sea level rises the difference between this and the levels of the land behind defences, and the buildings and settlements on it, will progressively change. In some cases this must already be negative (i.e. land below current sea level, which will become more pronounced). Although it is possible to increase the height of defences, the risk attached to any breach of defences in extreme events will progressively increase, so that defences would have to be constructed to progressively higher 'risk standards' to avoid catastrophic flooding events. The acceptable risk of breaching would become progressively smaller or even nil. If this factor is included, I consider it will not be possible to maintain viable defences in present positions for the long term, probably not for 100 years, although the plan presents this as uncertain. However, I accept that the way policies are currently formulated would allow for adjustment in future, and I support maintenance for at least the first epoch. I hope the policies will also help to ensure that inappropriate development does not occur that might prejudice future realignment that might be necessary. PDZ2: I agree that the</p>	<p><b>Action Plan</b> We acknowledge your concerns over stakeholder involvement and consultation on the Action Plan, because of its important role in The Wash SMP 2. Through the development of the SMP2 Action Plan we will inform all key stakeholders of how they can play an important role in the process. However, the Action Plan is being developed based on the responses we've received through the consultation. This will be reviewed and endorsed by our Client Steering Group (CSG) and Elected Members Forum (EMF).</p> <p><b>"No Regrets"</b> Your concern about the use of term "no regrets" has been fully debated at the Client Steering Group and the agreed position is to continue with the use of the term.</p> <p><b>PDZ1</b> Your comment about the land being increasingly lower than water levels is acknowledged, and we have added text to the document to reflect this.</p> <p><b>PDZ2</b> The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability and provide opportunities to replace the loss of habitat under current legislation. The shingle ridge would indeed become lower and wider in a natural state. This primarily leads to overtopping, but of course if this happens in a concentrated spot, then the erosion of the landward slope could cause a breach (despite the ridge being wider). We have added some text to make this consistent for epochs 2 and 3.</p> <p><b>PDZ3</b> The SMP2 Action Plan will identify the need for an integrated strategy of PDZ2, 3 and 4, which will look at funding and other issues for Hunstanton Town, and at the potential impacts of long-term HtL options for the cliffs. This will feed into the next round of SMPs.</p> <p><b>PDZ4</b> The cliffs at Hunstanton are a significant landscape feature associated with the town. They are often used in information about the town to identify its character and interest. Any proposal to defend the cliffs would need to ensure that the visual character and environmental importance of the cliffs</p>

		<p>situation is complicated and difficult to resolve, and that it is not realistic to achieve this in the timescale of preparation of this plan. I therefore support the proposed policy of maintaining the current defence while investigating future options. Nevertheless, I would expect that some form of realignment is inevitable in the future, and the draft plan seems to present a somewhat unrealistic view of this. I would think that some form of realignment should be the broad intent for epochs 2 and 3. In 2.3.3 the shingle ridge is described as being more susceptible to breaching under NAI. I question whether this is case, although it would be more susceptible to overtopping. The term overtopping is used for epoch 3, so there seems to be some inconsistency. I note that in 3.2 Implications of the plan, Landscape (p67), the plan states that "The plan is unlikely to have a significant effect on the AONB, because it is largely limited to the higher ground in this PDZ." The plan should acknowledge that there could be impacts on the setting of the AONB, which is still an important consideration. I would expect that these could be managed, and the setting potentially enhanced, and would appreciate involvement in discussions on the development of policies for this PDZ in future. PDZ3: I appreciate the desire to protect the coastal town of Hunstanton and its viability as an important aspect of the local tourism economy, but given that the plan acknowledges that there is uncertainty about the viability of maintaining current defences and coastal process effects, the HtL policy for all three epochs may give the wrong signals in terms of input to local planning policy development. If this is based on the policy as it stands, there is a danger that development could take place that gives rise to greater problems in future if some realignment needs to take place. I therefore suggest that a more precautionary approach in later epochs is adopted, at least until better information is available, in order to avoid this possibility. This would be more consistent with the idea of "no regret" policies. PDZ4: I recognise that the policy for epoch 3 is provisional, and that the intention to protect the cliff from further erosion when it threatens houses and the B1161 may be reviewed in future, but there seems to be some inconsistency in how this is presented in policies and diagrams. Given the acknowledged role of sediment from the eroding cliffs and the difficulties encountered in other parts of the Norfolk coast in attempting to prevent cliff erosion, it seems unlikely that this will be viable and sustainable. Although there will be time to understand this more fully before action has to be taken, a provisional policy of NAI or MR, with a proviso to hold if this were clearly demonstrated to be technically, environmentally and economically viable and sustainable in the long term, would be more realistic. Historic environment: I have been contacted by David Robertson of Norfolk Landscape Archaeology regarding his concerns over the treatment of the historic environment in the plan. I appreciate that there may have been problems in achieving the required input from the historic environment perspective during development of the plan, as there has been with the North Norfolk SMP, and I am not familiar with all of the historic environment interest and features, or the Defra and English Heritage guidance on the historic environment that David covers in his response. However, I support his view that the SMP should follow relevant guidance for consideration of the historic environment, and that it should consider the potential impacts of proposed policies on key historic environment assets. Although this might not affect policy options in most cases at this stage, this could set a precedent for other plans and affect subsequent review of the SMP. Minor comments: I note that in 2.2.2 on page 36, the Norfolk Coast Area of Outstanding Natural Beauty is referred to as the "North Norfolk coast Area of Outstanding Natural Beauty". I'm not sure if there are other places in the document where the</p>	<p>are maintained.  The value of the green space on the cliff top is acknowledged, and may need more emphasis in the documents. However, the SMP needs to balance its value, and that of the lighthouse, against the consequences of the prevention of cliff erosion. This could reduce sediment transport to the south, possibly reducing the beach in front of the Hunstanton promenade; it would have a negative effect on the appearance of the cliff face and its geological and landscape value; it would of course also be costly.  Based on current information, it is not clear how significantly the cliff top will be affected during the first and second epochs i.e. up to 2055. The action plan arising from the SMP will include the need for on-going monitoring and review of the cliffs in order to establish the rate and impact of cliff erosion. In the meantime we will need to give consideration of what action, if necessary, could be taken to reduce the rate of erosion that would not impact on the Hunstanton to Snettisham beaches or the visual and environmental importance of these cliffs.  We are working in partnership with local authorities and other partner organisations to ensure that we strike a balance between our objectives.</p> <p><b>Historic Environment</b>  Regarding your comments about the historic environment and David Robertson's concerns, we are currently working with Norfolk Landscape Archaeology and English Heritage to resolve the issues appropriately.  Your comments about the correct name of the Area of Outstanding Natural Beauty and coastal towns have been addressed in the revised document.  We acknowledge your support for the emerging policies from The Wash SMP2 and confirm that through the development of the SMP2 Action Plan we will inform all key stakeholders of how they can play an important role in the process.</p>
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			incorrect name is used, but would wish to see the correct name used throughout. In figures 2.13 (p40) and 2.14 (p43) South Wootton, North Wootton, Sandringham and Dersingham are described as “coastal towns”, which seems inaccurate to me. They don’t have a meaningful relationship with the coast in my view. (This may also apply to several settlements around the Wash, although these are not in the Norfolk Coast AONB and others may be happy with this description).	
32	Mr S Hemmings Black Sluice Internal Drainage Board	15/01/10	<p>The Board have an interest in the plan because the shoreline on the south side of the Haven and the section south of the mouth of the Haven bounding Frampton Fen protects this part of the Board’s District from flooding. The Board covers an area of approximately 43000 acres mainly south of Boston. Much of the land in this area is below the level of the highest tides. The Board is committed to reducing the risk of flooding to any land in the Board’s area. The Board fully supports the policy appraisal objectives on page 13 of the SMP and in particular the importance placed on agriculture. The steering group have carried out an excellent job in achieving a very sensible outcome for the plan. It is unlikely that there will be any alternative solution except “hold the line” on the length of shoreline bordering the Black Sluice area. However the Board supports the view stated in the response by Witham Fourth IDB that “hold the line” would give best value for money for epoch2 and very possibly epoch 3 for the length between Gibraltar Point and Wolferton Creek. Flood risk has a detrimental impact on Boston’s ability to attract investment and therefore, the future prosperity of its people and the business community. The local economy has many sectors and agriculture is just one of them but the significance of the Fens to the local economy and the UK’s food security cannot be stressed enough. It was pleasing to see Hilary Benn MP highlight this at the recent Oxford Farming Conference. The SMP2 should not advocate a policy that puts the economic stability of Boston at risk.</p>	<p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years. In order to do this the plan sets out a number of principles, the specific one that applies to your concern is listed below.</p> <p><i>“To ensure that shoreline management supports the continuation of sustainable patterns of development and considers possible effects on communities and their welfare”.</i></p> <p>The draft SMP has been developed, taking into account the importance and contribution of the land protected by The Wash defences to UK food production and food security, being a key welfare concern.</p> <p>The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability and provide opportunities to replace the loss of habitat under current legislation.</p> <p>The Wash sea defences currently protect in excess of 200,000 Ha of grade 1&amp;2 agricultural land. As part of the continued coastal protection we rely heavily on sediment being transported down the coast which is deposited in The Wash and helps our foreshores to grow. Our foreshores are an important element in flood defence and we rely heavily on their presence to reduce water depth, reducing wave energy and wave height which attack the defences. As a result of climate change and sea level rise we may see our foreshores disappear, which will impact on the stability of our sea defences and increase the risk of failure as they suffer greater attack from the sea.</p> <p>It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary. Where it becomes necessary to realign to provide a more sustainable sea defence to protect people and agriculture opportunities will be taken to provide habitat replacement at the same time. By managing our sea defences in this way we are able to reduce the risk of failure and give confidence by providing a good standard of protection around The Wash.</p> <p>As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme which will enable us to understand in more detail how the coastline is reacting to sea level rise.</p> <p>We acknowledge your support for the emerging policies from The Wash SMP2 and confirm that through the development of the SMP2 Action Plan we will inform all key stakeholders of how they can play an important role in</p>

				the process. However, It has been confirmed, following the Client Steering Group meeting of the 4 <sup>th</sup> February, 2010, that Hugh Drake will represent the interests of the Lincolnshire IDBs.
33	Mr M Robinson Environment Agency	15/01/10	As the lead authority for this Plan, we welcome the opportunity to provide consultation feedback. Through the EMF and CSG, together with our partners we have made significant contributions towards the plan and its current progress and support the management policies proposed for each of the 4 PDZs. Therefore, as part of this consultation, we do not intend to capture the above detail. However, as part of our ongoing internal consultation with colleagues on the plan, we have received the following comments. 1. The general layout of the documents and appendices are well structured with the processes and options clearly explained. 2. A table summarising the draft policy options would be very useful. 3. The action plan should consider how we communicate flood risk messages to the wider audience as the plan progresses.	We acknowledge your support for the emerging policies from The Wash SMP 2 and your advice offered on several issues.  You suggested that a table summarising the draft policy options would be very useful. This has been incorporated into the final main and summary documents. You also commented that the action plan should consider how we communicate flood risk messages to the wider audience as the plan progresses. This has also been incorporated.  Through development of the SMP Action Plan we will continue with our coastal monitoring, which will provide us with better information. This will enhance our understanding of how the coastline is reacting to sea level rise and aid us to communicate to the wider audience about the appropriate actions to be taken in the future.
34	John Watson Wash Estuary Strategy Group	15/01/10	Thank you for seeking the views of the Wash Estuary Strategy Group (WESG). We have been affected by the departure of Tammy Smalley as Project Officer in September. The Project Officer would normally co-ordinate the Group's response. This response is based on a discussion by the WESG Secretariat on 13th January 2010. The Project Officer attended some of the SMP meetings and was kept informed of the SMP's development by project partner representatives. During the preparation of the Plan, it was monitored for general compliance with the Wash Estuary Management Plan, Edition 2 (2004) and issues in relation to that raised at SMP meetings by representatives of this Group. The particular contribution that this Group made to the SMP and that I would like to be recognised is that its partner representatives were initially co-opted en masse to form the bulk of the SMP2 Elected Members' Forum and also, as a smaller proportion, the Client Steering Group. Through that involvement WESG considers that it played an important role in shaping the way in which the Environment Agency, on behalf of Defra, conducted this SMP(2) process! However, because WESG is made up of organisations, in particular local authorities and Natural England, that are also independent, and some at a political level, consultees on the SMP, then we must respect those individual organisations' opinions, while endeavouring also to provide a forum and a context for developing a shared and agreed position. I can therefore conclude that WESG: 1. agrees with and supports the principles on which the SMP2 has been prepared 2. considers the SMP2 to be a work in progress, which is still subject to change as a result of the full consultation responses but also, longer term, in response to the ongoing monitoring of the coastal conditions and possible evolution of policy in particular with respect to the transition from Epochs 1 to 2. 3. looks forward to opportunities to assist, through both its own work and by continuing involvement in the Client Steering Group and Elected Members' Forum, in the consequent engagement and wider visioning processes, in particular how the latter might be reflected in a future review of the WEMP (for Edition 3). 4. looks forward to considering the final Plan incorporating the results of this stage of consultation, as it moves towards adoption.	We acknowledge your support for the emerging policies from The Wash SMP 2 and through the development of the SMP2 Action Plan we will inform all key stakeholders of how they can play an important role in the process. May I take this opportunity to thank you for your involvement in the development of the plan and for your time in responding to The Wash SMP 2 consultation.
35	Mr D Hickman Lincolnshire County Council	14/01/10	Lincolnshire County Council supports the principles set out at the beginning of the Shoreline Management Plan, and recognises the wide range of interests that the draft Shoreline Management Plan for the Wash needs to balance. In particular, the	We acknowledge your support for the emerging policies from The Wash SMP 2 and your advice offered on several issues. The intent of the SMP is to set policy on how we manage our coastline

		<p>Council supports the long-term aim of protecting all existing communities with their economic and social assets, as set out in the policy appraisal objectives, and protecting as much grade 1 and 2 agricultural land as possible within the limits imposed by the need to maintain sustainable sea defences. Given the significant of the interaction between fluvial and coastal management, however, the Council believes that drainage authority pumping facilities should be included alongside the coastal infrastructure and installations that are explicitly recognised as assets for protection. The Council recognises the importance of natural features such as salt marsh and mudflat in reducing wave energy and contributing significantly to the long-term sustainability of 1 in 200 year standard sea defences. The Council also recognises that the present legislative framework includes European legal requirements to replace losses of coastal natural habitat. It is a very important aspect of the draft Shoreline Management Plan that it should provide a means of meeting these requirements through maintaining the existing inter-relationship between natural environment and artificial sea defence. For this reason, the Council supports the policy of Hold the Line for epoch one in policy development zone 1, and welcomes the approach of the draft Shoreline Management Plan in proposing conditional policies for epochs two and three dependant on accumulating hard evidence for the extent and timing of coastal change, while taking into account potential developments in the legal framework and in national priorities in the future. The Council considers it essential that any localised managed realignment of the coast must</p> <ul style="list-style-type: none"> <li>a. Be based on evidence, rather than pre-emptive on the basis of projections</li> <li>b. Deliver long-term improved flood defence to all communities, infrastructure and agricultural land in the locality</li> <li>c. Improve the economic, social and environmental well-being of all communities in the locality</li> <li>d. Be based on a default assumption of Hold the Line in the absence of compelling evidence for an alternative management solution.</li> </ul> <p>The draft Shoreline Management Plan is innovative in adopting this conditional approach, and the Council considers this approach sufficiently flexible to provide the benefits outlined above. The County Council considers the maintenance of current defence standards of 1 in 200 years essential to meet the principles set out at the beginning of the draft Shoreline Management Plan. The Council therefore welcomes the draft SMP's proposal for adopting this approach for policy development zone one throughout all three epochs, regardless of firm or conditional policies. The Council also notes that this approach means ensuring that defence standards keep pace with climate change and rising sea levels. The Council supports the basic principle of the SMP in formulating coastal policy without regard to current or projected cost, but believes that this principle should be adhered to in all policy units of the SMP. While the Council is supportive of developing local arrangements to ensure longer-term funding, such detail belongs in the next phase of the SMP – action planning – and should not be included in the high-level policy document itself. The Council has some concerns that the historic environment is not given consistent weight throughout the document, particularly in later sections, for example Section 2.2 on Land Use and Environment. There are some possible site interpretation issues within Appendix D. On page D49 (Unit 2 – Wrangle to Boston) seven medieval saltern sites are listed with a statement that these sites could potentially be substituted by re-creation elsewhere. This is not a recognised mitigation for impact on historic environment features. Once a historic feature is removed, its setting and character are destroyed and cannot be re-created. This area of the document should be reconsidered and the acceptable impact mitigation be given greater</p>	<p>against the threat of erosion and flood risk over a 100 year plan period. The current draft policy of 'Hold the Line' for PDZ1 for the first epoch recommends keeping pace with climate change which could see defences improved.</p> <p>The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability (to protect people and agriculture) and provide opportunities to replace the loss of habitat under current legislation.</p> <p>As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme which will enable us to understand in more detail how the coastline is reacting to sea level rise.</p> <p>Regarding your concern that the historic environment is not given consistent weight throughout the document, following a meeting between English Heritage and the Environment Agency, held on Wednesday 3 February 2010, the issue has been reviewed and addressed appropriately. It was agreed that more historic environment data would be added to the SMP and that through development of the action plan, all other historic environment issues raised, would be addressed.</p>
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			<p>consideration. The Council notes that the Strategic Environmental Assessment (Annex L) concludes that the draft SMP for the Wash “is considered to provide the most appropriate and prudent approach to management for The Wash” given the uncertainties over potential extent and timing of coastal change in epochs two and three. Pragmatically, the Assessment states that future SMPs will be in a better position to determine firm policies for epochs two and three, when the balance between protection of agricultural land and maintaining coastal habitats will need to be addressed in detail. The Council considers, as outlined above, that this balance must be discussed in terms of providing long-term defence sustainability with sensitivity towards environmental impact. Decisions on location and quantity of habitat replacement should not be driven purely by the requirements of habitat focused legislation.</p>	
36	Helen L Woolley Country Land and Business Association East Midlands	15/01/10	<p>The CLA is the leading national organisation which represents and supports businesses in rural communities, covering all aspects of land use and management, and also including professional, retail and commercial services, tourism and light industry. We represent the breadth of the rural economy and our 36,000 members in England and Wales who between them own around 5 million hectares of rural land. Our members run many different types of businesses in rural areas: agriculture, forestry, fisheries, tourism, recreation and other rural businesses. They lie at the heart of the rural economy, rural society and not least the rural environment. Availability of fresh water, flood and coastal defences are important concerns for them, and are, in turn, influenced by their land management activities. We have an interest and involvement in many Shoreline Management Plans and welcome the opportunity to comment on the Wash SMP. Having had discussions with our members who own land and businesses in the Wash Area we have set out some brief general observations below, leaving members, IDB's and other groups to comment on the plans for their specific area. General Comments on Shoreline Management Plans: We believe SMPs are intended to be a means of managing dynamic physical processes and guiding future decision making on the basis of community decisions about the value of various assets. Once a coastline is lost it is unlikely ever to be recovered and at the pace that sea level is rising practical defensive action taken now may be capable of protecting coastal land beyond the 100 years that the SMP is designed to cover. Cost benefit calculations that determine that Government should put off the task of securing the coastline until the last minute are inefficient and short-sighted. Once coastal defences have been neglected over a long period of time they will inevitably become much more costly to repair/replace – reducing the options available. The attitude should be ‘a stitch in time save nine’. However the effect of the current funding appraisal is to do the opposite, by undervaluing the long-term benefits in relation to the upfront costs. Shoreline Management Plans cannot be credible in rural areas while the cost benefit analysis techniques used to develop the policy options undervalue heritage, agricultural, commercial, infrastructure and community assets, and while the test discount rate declines so slowly that necessary long-term investment is made to appear uneconomic. We do, however, believe that private finance can be part of the equation. In the CLA's view the SMP should seek to value and do all it can to protect the following coastal assets:- Households: If in the long term loss of houses through erosion is unavoidable, homeowners should get proper help for relocation. We are encouraged by Defra's recent pathfinder consultation that this point is now being recognised. However the future budget for this will likely need to be</p>	<p>We acknowledge your support for the emerging policies from The Wash SMP 2 and through the development of the SMP2 Action Plan we will inform all key stakeholders of how they can play an important role in the process.</p> <p><b>Hold the line</b> The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability (to protect people and agriculture) and provide opportunities to replace the loss of habitat under current legislation. The current draft policy of ‘Hold the Line’ for PDZ 1, 2 &amp; 3 epoch 1, recommends keeping pace with climate change which could see defences improved. It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary. Where it becomes necessary to realign to provide a more sustainable sea defence to protect people and agriculture, opportunities will be taken to provide habitat replacement at the same time. By managing our sea defences in this way we are able to reduce the risk of failure and give confidence by providing a good standard of protection around The Wash.</p> <p><b>Food Security</b> The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years. In order to do this the plan sets out a number of principles, the specific one that applies to your concern about food security is listed below.</p> <p><i>“To ensure that shoreline management supports the continuation of sustainable patterns of development and considers possible effects on communities and their welfare”.</i></p> <p>The draft SMP has been developed, taking into account the importance and contribution of the land protected by The Wash defences to UK food production and food security, being a key welfare concern.</p> <p>The Wash sea defences currently protect in excess of 200,000 Ha of grade</p>

		<p>significantly greater than the sums on offer under this initial consultation. In considering houses at risk, there should be emphasis on protecting vulnerable people (the infirm who are at risk of losing lives in the event of serious flooding) and listed buildings. Agricultural land: The government undervalues agricultural land in its appraisal of flood and coastal risk management. Food and grown fuel production in the UK will be vitally important both to the UK economy and in the worldwide fight against climate change. The SMP should seek to protect this land and therefore the policies should have a starting presumption of hold the line. In addition, coastal grazing marshes provide both sustainable meat production and valuable biodiversity benefits, which cannot easily be relocated further inland, without massive investment – far greater than the cost of defending the land using soft engineering techniques. Freshwater supplies: The local agricultural economy is heavily dependant on good supplies of fresh water and the SMP needs to ensure local water sources are kept free from sea-water contamination. For climatic reasons it is impossible to relocate the high-value irrigated vegetable crops from the coastal region to other inland UK areas. Thus if the supply of irrigation water is reduced through sea-water contamination, food-miles/carbon footprint will be increased and the local economy will suffer. Again this favours a universal hold the line approach. Tourism: The value of tourism and recreation to both the economy of the Norfolk coastal area covered by the Wash SMP and the well-being of local residents cannot be underestimated. The SMP should ensure that the excellent beaches are not degraded and areas of public recreation and access are protected. Our historic buildings/sites form an integral part of the tourist economy and are highly valued by the local community – far beyond their monetary value. They should be protected as they can never be recreated once lost. Natural Environments: There is a growing feeling that the SMPs are being used to promote habitat recreation programmes without firm science or openness in the calculations behind habitat creation targets. If communities are to have confidence in the process of deciding between hold the line and managed realignment, greater transparency is needed in explaining how habitat recreation targets are calculated and then applied at a Sub cell level. The CLA's general presumption is that landowners should have the option to hold the line on their defences. In a time of budget constraints on the public purse we recognise that public funding may not always be possible for this and therefore we recognise that landowners may need to cost share in this approach. The practical examples of where this has already occurred suggest that this is a valid approach. If local businesses and communities sufficiently value their assets they may be willing to find ways to 'top up' the public purse. We are encouraged that as part of this SMP process, consultation has taken place with businesses in the PDZ2 area and by the progress that has been made in this regard with schemes in Suffolk at Bawdsey. Comments on the Wash Shoreline Management Plan: Overall we are supportive of the direction for the Wash SMP proposed in this draft plan however there are a number of points we would make for your consideration: Principles for Shoreline management of the Wash (paragraph 1.4): Absolutely key to these principles is the importance of the land protected by the Wash coastal defences to grow food and so make a valuable contribution to UK food production and food security. The current eleven stated principles do not make any reference to this yet paragraph 2.2.2 of the draft plan sets out very clearly the economic significance of the farming and food sectors both in the coastal strip and the hinterland protected by the Wash Coastal Defences between Gibraltar Point and Wolferton Creek. We suggest an additional principle be added to the effect: To ensure that the SMP takes</p>	<p>1&amp;2 agricultural land. As part of the continued coastal protection we rely heavily on sediment being transported down the coast which is deposited in The Wash and helps our foreshores to grow. Our foreshores are an important element in flood defence and we rely heavily on their presence to reduce water depth, reducing wave energy and wave height which attack the defences. As a result of climate change and sea level rise we may see our foreshores disappear, which will impact on the stability of our sea defences and increase the risk of failure as they suffer greater attack from the sea.</p> <p><b>Policy Development Zones</b> Concerning your point on the policy development zones, I wish to refer you to the draft non – technical summary on page 9, <i>“At the medium scale, we have divided the area into four units for which the coastal processes clearly work differently, and which each also have distinctive values and land uses: these are called the Policy Development Zones (PDZs). The PDZs are largely independent of each other in terms of shoreline management, but we have taken account of their interactions. The PDZs have played an important part in developing this draft plan”.</i></p> <p><b>PDZ2 - Stakeholders Engagement</b> Through the SMP2 Action Plan we will inform key stakeholders of how they can play an important role in the development of future policy. You will be aware that for PDZ 2 we have set up a key stakeholders sub-group at which landowners are represented by Mr Mark Robinson (landowner). The aim of the sub-group is to work together to address issues for the 2<sup>nd</sup> and 3<sup>rd</sup> epoch. The group had its first meeting on 18 November 2009, with representation from the Environment Agency, the Borough Council of Kings Lynn and West Norfolk, landowners, caravan park owners, beach bungalows associations, The Chamber of Commerce, parish councils and RSPB.</p>
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			<p>into account the importance and contribution of the land protected by the Wash defences to UK food production and long term food security. Balancing the Environment and Socio-economic priorities: The protection of coastal communities and agricultural land should be seen as key objectives, given equal priority to the protection of designated environmental sites. A sustainable future for the coastline requires economic and social/community assets to be given equal importance as environmental assets. Much of our valuable environment has legal protection which can lead to lack of consideration being given to socio-economic factors. It is worth remembering that environmental protection cannot be achieved without a healthy economy – equally true in both urban and rural locations. There needs to be a debate about the level of funds required and the need to increase the inter-tidal area to compensate for lost biodiversity where the changes to habitats are being brought about by natural processes driven by climate change. We fully support the decision to adopt a no regret approach and given the uncertainty of future developments agree that it is essential that there is a clear programme of monitoring, study and collaboration to support long term decisions. It is essential that the statistics for accretion and sea level rise in Appendix C to the Wash SMP in the past and future are checked and collected with the utmost impartiality and rigour, as future decisions and in particular those relating to habitat requirements depend on this data. To some of our membership Natural England is not seen as unbiased so we seek reassurance that the processes for collection and checking will be independent and transparent. The importance of the Wash area for its' intertidal habitats and biodiversity is well documented and there are concerns that the Wash may become the focus for the re-creation of habitat lost elsewhere. We seek re-assurances that this will not be the case particularly if it impacts on the medium and long term decisions regarding coastal defences and in particular the protection of agricultural land. Current condition of Sea Defences: The plan makes very little reference to the conditions of the sea defences. This contrasts to some of the other plans where much of policy prescription is based around the expected remaining life/cost of repair of the defences. Policy Development Zones: Whilst we understand the logic of sub-dividing the SMP area into 4 zones we do not believe that the current plan adequately covers and accounts for the potential interactions between the four zones. In particular we believe that PDZ 1 and PDZ 2 are inter-dependant and the plan needs to fully recognise this – whilst these interactions are acknowledged we are not sure that they are adequately dealt with in the current draft. Our comments are confined to PDZ1 and PDZ2 as it is the decisions made in these two PDZs that affect the members we represent. PDZ1: We fully support the assessment that the 'no active intervention' policy in PDZ1 is not a realistic option. We welcome the decision to adopt a 'hold the line' policy in the short term and we are reassured by comments made by Natural England at a recent meeting that NE does not have an agenda for managed retreat on the Wash. Our preferred option would be to extend a hold the line policy across all 3 epochs however we recognise that this is difficult when faced with the uncertainty outlined in the plan and at this stage accept the conditional nature of the 'Hold the Line' policy for the longer term together with ongoing monitoring and research. However we re-iterate our earlier comments that landowners should have the option to hold the line on their defences and would add that any loss of land/economic activity resulting from implementation of landward realignment must be adequately compensated for through specific funding. Unless this is done many of our members are likely to oppose its implementation. We would add that landowners view loss of productive land from an emotive as well as an</p>	
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			<p>economic position. Much land has been in the same family ownership for many generations and there is often a reluctance to give it up, no matter what the economic package. Much of the land area is in private ownership and it is vital to properly engage with landowners at an early stage if plans for change in land use are to be considered. As an organisation will we do our best to assist in this matter. We are concerned that the maintenance of some of the existing banks is poor and many parts of the flood defences in PDZ1 do not provide for a 1:200 year flood occurrence – we would request that all flood defences are bought up to and then maintained to offer 1:200 year protection. PDZ2: The focus of the plan in this PDZ is on the protection of people, communities and the local tourism economy. There is however a significant area of low lying agricultural land in this area. The indications are that over the life of this plan there will be some form of land use adaptation which will impact on the grade 3 and grade 4 land in order to offer the necessary protection to communities and the local businesses. We believe that there are two distinct areas within this PDZ and these should be considered separately when deciding on the policy for each of the three epochs. The southern part of PDZ2 is sea banks and shingle ridge where there is currently accretion and salt marsh creation, the presumption would have to be that the defences in this area are unlikely to be under great pressure - either physically or financially compared to the area further North in the more inhabited areas where there are greater pressures on coastal defences. Our view is that there should be a hold the policy across this PDZ, in the Northern more inhabited area where the defences are more costly to maintain we acknowledge that some private funding may be necessary to achieve this policy and we welcome the tourist businesses and others willingness contribute to the costs of achieving a hold the line policy. In the southern part of the PDZ which is largely agricultural and where the defences are under less pressure and are less costly to maintain we feel that there should be a hold the line policy across all epochs and this should be achieved without private landowners having to share the costs. However we re-iterate our previous comments in relation to landowners having the option to hold the line on their defences and that any loss of land/economic activity resulting from land use adaptation must be adequately compensated. Much of the land is in private ownership and in addition to working with caravan owners and other local businesses it is vital to properly engage with landowners at an early stage if plans for change in land use and a proposed joint plan with public and private funding are to be considered. Thank you for the opportunity to comment on the draft SMP and we look forward to working with interested parties as the process of finalisation and implementation moves forward.</p>	
37	Margaret & Edward Davey	15/01/10	<p>We welcome the invitation to comment on the proposals for PDZ4 (Hunstanton Cliffs), an area which includes our property (No 3 Lighthouse Close, part of the old Coastguard Station). The proposal to defer any action to sustain the cliff top properties and B1161 until erosion “starts to threaten” is vague and unsatisfactory. It begs the question as to how much erosion has to take place before anything should be done. Decisions surely cannot be left until erosion has destroyed most of the green cliff top area, which is what the proposal implies. Loss of this unique and justly famous area, with its amenity value and cluster of historic buildings, would be very damaging for the economic viability of Hunstanton as a tourist destination, and indeed totally contrary to the main objective for PDZ3, which is “to sustain the viability of Hunstanton Town as a tourist resort and regional commercial centre”. The town’s viability cannot be sustained if its principal attractions are gradually</p>	<p>The main aim of the SMP is to develop an intent of management for the shoreline that achieves the best possible balance of all the values and features that occur around the shoreline over the next 100 years. In order to do this the plan sets out a number of principles. The specific ones that apply to your concerns are listed below.</p> <p><i>“To ensure that localised decisions do not affect the natural balance of the coastline and shoreline management elsewhere.”</i></p> <p>Hunstanton cliffs are not defended and are therefore subject to natural erosion. The material eroded from the cliffs is a source of sediment which feeds the beaches along the frontage between Hunstanton and Snettisham Scalp. If the decision to prevent further erosion was taken we would need to</p>

		<p>eroded away, beginning with the Lighthouse, an iconic attraction which symbolizes Hunstanton. Indeed, the importance of the area has recently been recognized with its inclusion in the newly-extended Town Conservation Area. The cliff top area is at least as important to Hunstanton as the Town Green, which no-one would think of allowing to erode. But in any event, it would be far too late to leave matters until the B1161 is almost at the cliff edge. It must be doubtful if cliff erosion can ever be halted altogether, and there would be little margin for error if the measures taken failed to halt the erosion. The road, the designated boundary line of last resort, would then be at risk, and the cliff top properties behind it exposed. Indeed, a road running along the cliff-edge, or very close to it, would surely encourage environmental damage and accelerate erosion, especially given the known fractured properties of the higher levels of chalk in the cliffs. Under this scenario, it is difficult to see how the Lighthouse could be saved when the rest of the cliff top would be receding, but at least the option is mentioned as a matter for decision. The report is however silent on the prospective fate of (i) the 13th century St Edmund's Chapel ruins (also listed), which inspired the town's original name; (ii) the historic Coastguard Lookout (originally the Marconi Station), which is about the same distance from the cliff top edge as the Lighthouse and similarly at risk; and (iii) the 1901 Admiralty-built Coastguard Cottages (former Coastguard Station) in Lighthouse Close. It is disturbing that none of these important buildings, which all form part of the historic Lighthouse area, are mentioned. Indeed, the general term "cliff top properties" used in the plan could be taken to refer only those properties on the landward side of Cliff Parade. It can only be inferred from the map that Lighthouse Close would be part of the long-term defence line, and that the Chapel ruins and Coastguard Cottages would be defended in the last resort. The report certainly fails to recognize the "Historic environment" when it comments (p67) that "Most features of historic interest around the Wash...will remain protected...and it is unlikely that any of the listed buildings will be affected". This is wrong. Clearly the Lighthouse will be affected, as the report itself states elsewhere and also possibly St Edmund's Chapel. A more detailed and more accurate analysis of the historic environment is needed before informed decisions can be made on its future. Nor is there any mention of the Norfolk Coast Path, a spur of which runs along the cliff top, which enhances the amenity/recreational value of the area. Already the path has diminished to a largely grassless and often muddy channel between the latest cliff top fencing and the rear of the lighthouse garden wall and soon cliff top walkers will have to circumvent the Lighthouse, so erosion is already beginning to make an impact. A more detailed description of the amenity value of the whole cliff top area, with explicit reference to its buildings and their historic importance, and how they stand to be affected, is essential as a basis for further decisions. It is misleading to suggest that, whilst for the town "the plan supports the amenity and recreation function of Hunstanton", for the cliffs "there is no direct effect on amenity and recreation". There would be substantial indirect impact which cannot be discounted. It is a major amenity and recreation area for visitors and local people to enjoy and its loss would have a huge adverse impact on tourism, with far fewer visitors coming to the town and boosting the local economy. We also note from the map that it is apparently the intention to allow the cliff top car-park and mini golf-course to erode entirely. This proposal does not seem to link up sensibly with the plans for Old Hunstanton northwards for which the line of defence is to be the existing dunes. This line should surely be continuous with the line of the cliffs. It is disappointing that the report is unable to discuss the possible conservation measures for the cliffs, so</p>	<p>look very carefully at the impact this would have on the remainder of the frontage and its importance as a beach holiday attraction.</p> <p><i>"To ensure that shoreline management recognises the character of the coastal landscape."</i></p> <p>The cliffs at Hunstanton are a significant landscape feature associated with the town. They are often used in information about the town to identify its character and interest. Any proposal to defend the cliffs would need to ensure that the visual character and environmental importance of the cliffs are maintained. This requirement would have to be balanced against the other objectives of the plan which include:</p> <p><i>"To ensure that shoreline management has regard to the historic environment" and ".....supports conservation and enhancement of biodiversity"</i></p> <p>Based on current information, it is not clear how significantly the cliff top will be affected during the first and second epochs i.e. up to 2055. The action plan arising from the SMP will include the need for on-going monitoring and review of the cliffs in order to establish the rate and impact of cliff erosion. In the meantime we will need to give consideration of what action, if necessary, could be taken to reduce the rate of erosion that would not impact on the Hunstanton to Snettisham beaches or the visual, historical and environmental importance of these cliffs.</p> <p>As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme and a strategic review of PDZs 2, 3 and 4. This will enable us to understand in more detail how the coastline is reacting to sea level rise.</p> <p>Through development of the Action Plan we will inform key stakeholders of how we can work collaboratively to manage these issues.</p>
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			that consideration could be given to their acceptability and cost. Perhaps the promised studies will tell us more, although there is surely a good deal of information from existing studies on possible options already available. Not all, perhaps, need be unacceptably disfiguring to the cliff-face. We suggest: a. future decisions should be based on a more thorough study and assessment of the economic, amenity, recreational and historical value of the cliff top area, which should be properly related to the assessment of the importance of the town as a whole as recognized in PDZ 3 b. an urgent priority should be attached to a comprehensive plan to save the cliff top area as a whole that can be activated in accordance with the advance of erosion c. the first priority of the plan should be to develop a pilot scheme, the intention of which should be to limit further erosion of the cliffs at the Lighthouse, and adjacent Look-Out, drawing on the less obtrusive technologies available.	
38	Mr S L.Sellers Fenland Wildfowlers Association	14/01/10	I am writing in response to the public consultation on the second (draft) version of the Wash Shoreline Management Plan. The WWJC represent wildfowling and conservation interests from Gibraltar Point to Heacham and work closely with Natural England, Defence Estates and the Crown Estate in the management of this special area. We recognise the use of the four management policies, HtL, AtL, MR and NAI and the use of three epochs to guide short term, medium term and long term planning and policy. We also recognise that there are many complex processes at work in the embayment and that not all of these are fully understood and that further research and analysis is required to achieve a better understanding of the many factors affecting these processes. As organisations we welcome the description of PDZ1 as being, in the main, robust in the short term and welcome the management intent of sustaining the flood defence. It should be recorded that we would be concerned that in the medium to long term, PDZ1 is susceptible to possible loss of intertidal habitats and saltmarsh and its impact on the sea defences. As an important refuge and roost area, particularly on higher spring tides, we welcome the management intent, in the short term, for HtL for PDZ2. We also welcome the information that owners and residents would be willing to contribute to funding a HtL policy. We note that there is no change in policy from SMP1 for the short term, however we would be concerned should MR or NAI be adopted for the mid-term ( 2nd epoch). Were there to be a need for the development of compensatory habitat, the member associations of the WWJC would welcome the opportunity engage in the creation and management of such compensatory habitat.	We acknowledge your support for the emerging policies from The Wash SMP 2. We also recognise the long standing and culturally important activity of wildfowling and the sensitive nature of the habitats over which wildfowlers shoot. The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability (to protect people and agriculture) and provide opportunities to replace the loss of habitat under current legislation. As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme and a strategic review of PDZs 2, 3 and 4. This will enable us to understand in more detail how the coastline is reacting to sea level rise. Through development of the Action Plan we will inform key stakeholders of how we can work collaboratively to manage these issues.
39	Mark Denman	15/01/10	1) Factual errors and omissions concerning PDZ2: A): PDZ2, at least as far north as the southern edge of Heacham, contains a substantial amount of Grade 1 and/or Grade 2 agricultural land, which is farmed by Ken Hill and other local estates. The statements concerning this matter on page 41 are hence incorrect. B): Our local Carstone quarry is located near Snettisham, not Heacham as stated on page 41. C): On page 42 mention is made of the large commercial caravan parks at Heacham and to the south of Hunstanton. However for whatever reason it has been neglected to mention the large caravan parks at Snettisham/Shepherd's Port. D): On page 54 there is no mention as to why future shingle ridge re-profiling is "...unlikely to be sustainable or affordable." No "ballpark costs for these options" has been provided, as you have done on page 52 for PDZ1. E): On page 54 you state that a NAI policy "...could have a large effect on the functioning of Hunstanton as a coastal resort." However you have neglected to mention the obvious fact that a	In addition to the hard defence which should have been shown between Hunstanton and the ramp at Heacham North beach, there are two isolated lengths of hard defence in PDZ2: <ul style="list-style-type: none"> <li>• Just to the north of Snettisham Scalp (Heacham Dam) which consists of approx. 400m of revetment.</li> <li>• Just south of Snettisham Scalp (protecting the properties) which consists of approx. 550m of sea wall/revetment.</li> </ul> We have taken account of these isolated sections of defence: they are listed in the defence assessment tables provided in Appendix F (see p.F19) and were included (to some extent) on the relevant figures in Appendix F (see pages F26 to F28). They have, therefore been taken into account in policy development. However, not mentioning them specifically in the policy statements and on the policy maps is an omission and this will be corrected.

			<p>NAI policy could also have a large effect on Snettisham, Heacham, and Dersingham as viable large settlements, as the "Landward Edge of Environment Agency Flood Zone" (current position shown on your map on page 79) will move presumably move substantially eastwards by the end of Epochs 2 and 3. For whatever reason the projected landward edge the flood zone at the end of each of these epochs has not been shown on your map. F): There is a glaring omission on the map on page 79, in that the two sections of "Concrete Flood Defence" in the Snettisham area (one between Snettisham/Shepherd's Port and Heacham, and the other just south of Snettisham/Shepherd's Port) have for whatever reason not been included! 2) General comments: As a long-term resident of Snettisham, I do not want to see my home and my village threatened by flooding from the sea, either now or at any time in the however distant future. The Landward Edge of the Environment Agency Flood Zone already (at this point in time) extends into parts of the villages of Heacham and Dersingham, and is very close to the villages of Snettisham and Ingoldisthorpe. It also already extends across the A149 Bypass (the main road in our area). Given an accepted total sea level rise of 1.1 metres between now and the end of Epoch 3 (page 28 of the Draft), it seems obvious that the landward edge of the flood zone will move substantially eastwards during this time. Although, as mentioned above, no mapping of this has been included in your Draft, I would assume that the villages of Snettisham and Ingoldisthorpe, and even larger portions of Heacham and Dersingham, will hence be threatened. Therefore, in order to prevent or minimise the possibility of our villages being flooded in the future, it appears obvious that a HtL strategy must be adopted for PDZ2. It would appear to me that it is possible that, in order to facilitate the adoption of cheaper and easier NAI or MR policies, the agricultural, commercial, and residential importance of our PDZ2 area is being downplayed.</p>	<p>Although these changes need to be made to the documents, there is no overall impact on the draft policy for PDZ2:</p> <ul style="list-style-type: none"> <li>• In the short term we say that the frontline defences will be held, so this will apply to both the shingle ridge and hard defences.</li> <li>• In the long term, there is uncertainty, and this uncertainty would still apply to the hard defences as well as the shingle ridge in PDZ2. There is a possibility that the isolated lengths of hard defence could be used in flood defence strategies, or it may be that they are subject to Managed Realignment or No Active Intervention. This is beyond the scope of the SMP given the uncertainties/issues highlighted in the SMP documentation. A review of the defences is planned to be undertaken between 2010 and 2013.</li> </ul> <p>The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability (to protect people and agriculture) and provide opportunities to replace the loss of habitat under current legislation.</p> <p>Through the SMP2 Action Plan we will inform key stakeholders of how they can play an important role in the development of future policy. Please be aware that for PDZ 2 we have set up a key stakeholders sub-group. The aim of the sub-group is to work together to address issues for the 2<sup>nd</sup> and 3<sup>rd</sup> epoch. The group had its first meeting on 18 November 2009, with representation from the Environment Agency, the Borough Council of Kings Lynn and West Norfolk, landowners, caravan park owners, beach bungalows associations, The Chamber of Commerce, parish councils and RSPB.</p> <p>As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme and a strategic review of PDZs 2, 3 and 4. This will enable us to understand in more detail how the coastline is reacting to sea level rise.</p> <p>All other corrections and omissions you identified in your response have been reviewed and any text changes will be agreed with our Client Steering Group.</p>
40	Dr Jim Williams English Heritage, East Midlands Region	15/01/10	<p>Our comments on the Draft SMP for the Wash are divided into three sections, covering general comments on the proposed policy decisions, specific recommendations for changes to improve the Draft SMP and its associated documents, then finally, detailed comments for each of the consultation documents. General comments on the proposed SMP policies: The Draft SMP Main Document sets out proposed policy choices for each of the four Policy Development Zones (PDZ) covered within the area of this SMP. For PDZs 1-3 the proposed policy is to Hold The Line (HTL) within the near future (epoch 1) and to conduct further monitoring and undertake further local consultation to identify the most appropriate course of action for later periods (epochs 2 &amp;3). As this policy would provide continued protection from flooding for historic environment assets located behind the current flood defence structures and represents a continuation of the current regime, English Heritage are happy to support this proposed policy choice. The policy decision for the final Policy Development Zone (PDZ4) is for No Active Management for the first two epochs up to the point that erosion starts to threaten cliff top properties and the B1161. Although for epochs 1 &amp; 2 this is also effectively</p>	<p>As part of the SMP partnership group, at which your organisation is represented, your concerns are noted and as agreed at the meeting of the Environment Agency and yourselves on 3 February 2010, we will seek to resolve these matters through the partnership process.</p> <p>May I take this opportunity to thank you for your involvement in the development of the plan and for your time in responding to The Wash SMP 2 consultation.</p>

			<p>a continuation of the current policy in this area, English Heritage feel that insufficient consideration has been given to the potential impact of this policy on a range of designated and non-designated historic environment assets at risk of loss or damage as a result of erosion of the cliffs at Hunstanton. As will be covered in more detail below, we believe in particular that the national designated status of these assets has been ignored within the policy appraisal process. The Draft SMP recognises that a policy of No Active Intervention could lead to loss of or damage to the lighthouse on the cliffs at Hunstanton (pages 56-7). This 19th Century lighthouse is Grade II listed, as are the nearby remains of St Edmund's Chapel. Both sit within the Conservation Area of Hunstanton. The grass sward on the cliffs at Hunstanton which contains the lighthouse and chapel sites is also integral to the Conservation Area and plays an important role in defining the character of that part of the town. It was included in the Conservation Area extension only last year. The impact of the policy on these historic environment assets has not been fully considered; the text of the Draft SMP even goes as far as to suggest that "it is unlikely that any of the listed buildings will be affected" (Page 67). English Heritage do not therefore agree that this is the most appropriate policy choice for this Policy Development Zone. The policy suggests that in the future a Hold The Line policy may be implemented to stop further erosion to protect the road (B1161) and residential properties to the east of the road. We feel that if it is possible to protect the cliffs from erosion in the future, then there is no reason why this should not also be considered at this point in order to protect the National important historic environment remains that are currently threatened by this current proposed policy decision. As we do not feel the appraisal for this PDZ has been properly carried out (because the appropriate historic environment information was not included) we cannot accept this draft policy for PDZ4 and thus, if published in its current form, could not sign up to the Shoreline Management Plan for the Wash. Specific recommendations for changes to improve the Draft SMP and its associated documents: We feel that there are three major areas where further work is needed to improve the draft SMP, aside for the issue raised above about the actual policy choice for PDZ4. These three points summarise more detailed comments made in the appendix to this letter. A - Insufficient and incomplete data: The first issue relates to missing historic environment data within the Draft Wash SMP and SEA. Specifically this relates to the Norfolk section of the SMP. During the development of the Wash SMP, The Environment Agency provided funds for the production of a Rapid Coastal Zone Assessment Survey (RCZAS) to be completed for the Lincolnshire section of the SMP. This report summarised the known historic environment data within the County Historic Environment Record (HER), and carried out further research to identify further records of known features (for example within records held at the National Monuments Record) as well as ground based visual survey in the foreshore area. The Norfolk RCZAS was completed some time ago and provides a snapshot of the foreshore area. It does not contain known historic environment assets behind the foreshore area, for example those on the Norfolk HER. As such it provides an incomplete picture of the historic environment of that area. In our response to the SEA scoping for the Wash SMP we highlighted the fact that insufficient attention had been paid to all classes of designated historic environment assets, and that non-designated features should also be included. This is noted within the current SEA (see Annex II-2). Our advice, and that set out in both the English Heritage and Defra guidance on Shoreline Management Plans is that all relevant historic environment assets should be included within the SMP, and</p>	
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			<p>that consultation with the local authority Historic Environment Record is vital to ensure that all known features are included in relevant studies. It is clear this has not happened in this case, and this has caused significant problems, not least the failure to identify the lighthouse threatened with loss through erosion in PDZ4 as a Grade II listed building. Furthermore, we also feel that the treatment of the historic environment within the SMP and SEA documentation is fairly limited compared with most other environmental or social issues. Sections summarising the historic environment issues within PDZs are exceptionally short, and fail to draw on the extensive information that is available. This leads to the impression that the historic environment is not treated with the same rigor as other issues. No attempts have been made, for example, to draw on the studies of historic landscape character that have been carried out in the Wash. Historic landscapes and their role in defining coastal character and historic significance (for example in areas of historic reclamation) could and should form part of discussions about the policy units. B - Policy Appraisal Objectives: During initial discussions on the SMP and SEA policy appraisal objectives we raised concern that there was not specific objective for the historic environment, but that it was only covered within the objectives relating to timing. The effect of this is that the SMP does not have the necessary emphasis on the preservation of historic environment assets, nor the appropriate objectives to measure whether historic environment features are impacted by proposed policies. For example, in the assessment of managed realignment in PDZ1 in Appendix E (Policy development and appraisal, page E92) a total of 192 historic environment sites are at risk as a result of realignment and saltmarsh erosion, yet the overall score is 6 (described as partly fulfilled). In this case, there would be sufficient time to record these features before they were lost, which is why the score is more favourable than if the objective focused, as we believe it should, on the preservation of these assets. Equally, the current objective also fails to adequately flag the significant potential impact of a NAI policy for PDZ4 (see Page 31 appendix G), although in this case it is also clear that listed buildings have not been included in the assessment. We feel that this situation is unsatisfactory, and believe we feel that there should be two objectives for the historic environment. One should be a new, specific objective relating to the preservation of historic environment assets, whilst the second would build upon the existing text to ensure that sufficient time was provided to mitigate any potential loss of historic environment features. This would guarantee that where significant sites were going to be impacted that loss could be recognised in the SEA and SMP appraisal process, but that given the long lead in time before these impacts are likely to occur, an objective relating to timing provides an opportunity to demonstrate that appropriate mitigation measures can be put in place to manage (as far as possible) any predicted damage or loss. We are happy to work with the Environment Agency and Royal Haskoning to find appropriate terminology to ensure that potential impacts on the historic environment are adequately appraised. To begin that process we suggest the two following objectives A new, stand alone objective for the historic environment "Preserve historic environment assets in situ where feasible". Alter slightly the existing timing objective for the historic environment to reflect the fact that recording is not the only method of mitigation "Provide sufficient time, if required, for appropriate mitigation of loss or damage to historic environment assets if preservation in situ cannot be achieved" C - Potential for Substitution – Thematic review (Appendix D)We are concerned that the unique and irreplaceable nature of historic environment assets is not fully recognised within certain parts of the Shoreline Management Plan. In</p>	
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			<p>particular, within tables in the thematic review (Appendix D) there are instances where table entries suggest that there is a potential for substitution of historic environment assets. As these sites are all unique and irreplaceable, it is not possible for substitution to take place. Within the same table, it is also not entirely clear how certain features have been selected for having “enough of this benefit”? We do not believe that the appraisal of the historic environment assets in the thematic review has been carried out to an appropriate level. The entries lack consistency and data are missing (i.e. HER data, listed buildings and conservation areas in Norfolk for example). We believe that this document needs considerable revision to provide a much more coherent analysis of all of the historic environment assets within the study area. Further comments on Appendix D are given in the Appendix to this correspondence. Detailed comments: Detailed comments on each of the consultation documents are provided at the end of this correspondence in Appendix 1. Moving forward – Finalising the SMP and Action Plan: Although English Heritage supports the proposed policy choices for PDZs 1-3, we are unwilling to accept the SMP in its current form whilst the policy of No Active Intervention for PDZ4 remains without a further full re-appraisal of policy choices for this PDZ taking into account all relevant historic environment data. However, English Heritage remain committed to working towards the implementation of the Wash SMP and believe that these problems can be addressed in the coming months through our engagement with the Environment Agency and the project consultants Royal Haskoning, as well as the Client Steering Group. Given the constrained timetable for SMP completion over the coming months, we are eager to make every effort to find ways to resolve these difficulties and work with all involved to improve the current SMP so that it provides better protection for all of the historic environment of the Wash SMP area. In the first instance we recommend a meeting between ourselves, the Environment Agency, Royal Haskoning and relevant local authority historic environment staff (where appropriate) to discuss further the issues set out in this consultation response. We feel that this is a matter of some priority, and would be keen to hold a meeting before the Client Steering Group (CSG) meeting on the 4th February so that we do not have to take up so much time at the CSG discussing these issues in detail. <b>See Appendix 4 for further details.</b></p>	
41	Amy Crossley RSPB	15/01/10	<p>We provide comments in relation to the 'Wash SMP AA and IROPI note for CSG/EMF', below. The RSPB's current position is: a. We support the approach outlined under option 1. This complies with legal requirements and national level guidance relating to SMPs, and provides a clear and transparent outline of the action that would be required to be undertaken, in the occurrence of an erosional scenario. b. We do not support the approach outlined in option 2. Whilst we acknowledge the difficulties involved in selecting policies when considerable uncertainties relating to present and likely future hydro-geomorphological and ecological parameters currently exist, we do not support the deferral of decisions on shoreline management policy in anticipation of the possibility of changing societal, legal or economic frameworks/issues. Strategic documents such as SMPs should operate within all existing frameworks, utilising the best available information at the time, to ensure that current obligations and objectives can be met during the implementation period of the Plan. It is not appropriate for SMPs to include speculations relating to possible changes in future societal priorities and issues, or to pre-empt changes in the relevant legislative frameworks, which may or may not have implications for the selection of appropriate shoreline management policy at the present time. Indeed, it is equally likely that the existing set of societal priorities</p>	<p>Thank you for your response to The Wash SMP 2 public consultation received on 15 January 2010. We welcome your support for the overall plan objectives and note your concerns over the wording around Policy Development Zone 1. Given your original concerns and the ongoing dialogue between our organisations and members of the SMP group, it is very reassuring to read from Mr Gwyn Williams' e-mail dated 25 March 2010, that you recognise the journey the SMP has recently travelled to embrace the concerns of RSPB. As part of the e-mail, Mr Williams offered further suggestions for 'editorial tidying up', of page 91 of the main document, which have also been discussed with members of the SMP group. The group felt by altering the position of certain paragraphs the emphasis of the text loses some of its clarity from its original meaning. As the original text was debated at length by the partnership over a number of months and several meetings, these alterations have the potential to open up a new debate within the partnership on a matter where we already have a broad agreement. On this occasion we have decided to run with the original text and trust you will appreciate this compromise in reaching our decision. I would personally like to thank both you and Mr Williams on</p>

			and legal framework will persist throughout the Plan implementation period. The requirement for SMPs to operate within the existing legal framework takes precedence over the possibility that societal priorities may change within the timeframe of the Plan. Unlike uncertainties over future environmental conditions, the question of whether societal conditions will change in the future cannot be addressed empirically by the present SMP process, or with any degree of certainty through other means. The approach presented in option 2 serves to introduce unnecessary uncertainty to the present SMP, and brings its soundness and transparency for all stakeholders into question. It also goes against existing national SMP guidance and is not in accordance with the precautionary principle. We do not support the approach presented in option 3. This approach would fail at the Habitats Regulations alternatives test, as there are clearly other feasible management options that would achieve the objectives of the Plan, which would not result in an adverse effect to a European site/s. <b>See Appendix 5 for further details.</b>	behalf of the partnership for all your suggestions, which have contributed towards this SMP reaching a stronger outcome. Also, we would welcome the opportunity to meet up with you both to discuss the SMP process and to enhance our working relationship on future projects.
42	David Robertson Norfolk Local Archaeology	15/01/10	Norfolk Landscape Archaeology (NLA) is responsible for safeguarding Norfolk's historic environment, including archaeological features and historic landscapes. Our aims are to record, to conserve, to interpret and to provide information and advice on the historic environment. NLA is part of the Norfolk Museums and Archaeology Service, a joint service of Norfolk's district and county councils. NLA does not believe the draft SMP or the accompanying Strategic Environmental Assessment (SEA) adequately cover the historic environment. Unfortunately neither reflects the diversity and significance of the study area's historic environment, nor do they fully assess the impact the proposed policies will have on it. In order for NLA to provide its support for the final version of the North Norfolk SMP, we believe the historic environment elements of the SMP and SEA need to be fully revisited. The attached document outlines NLA's serious concerns. These concerns are explained in general terms, followed by detailed comments on specific elements of the SMP and appendices. NLA formally advises the Borough of King's Lynn and West Norfolk and Norfolk County Council on the historic environment. As these bodies sit on the Wash SMP Steering Group, we have advised them of our serious concerns. We have also discussed the issues with English Heritage, the Norfolk Coast Partnership and Lincolnshire County Council. NLA's concerns are also raised in Norfolk County Council's formal response to the draft SMP. The comments contained in this letter and in the attached document supplement and provide additional information to support Norfolk County Council's formal response. NLA hopes that the Environment Agency finds the comments helpful. We are keen to work closely with the Environment Agency to ensure that the final SMP adequately covers the historic environment in line with English Heritage and DEFRA SMP guidance documents. <b>See Appendix 6 for further details.</b>	As part of the SMP partnership group, at which your organisation is represented, your concerns are noted and as agreed at the meeting of the Environment Agency and yourselves on 3 February 2010, we will seek to resolve these matters through the partnership process. May I take this opportunity to thank you for your involvement in the development of the plan and for your time in responding to The Wash SMP 2 consultation.
43	Caroline Steel Lincolnshire Wildlife Trust	15/01/10	General Points: Thank you for consulting the Lincolnshire Wildlife Trust (LWT, the Trust) on the Wash Shoreline Management Plan (SMP). The majority of our comments relate to the Lincolnshire part of the Wash i.e. PDZ1 - Gibraltar Point to Wolferton Creek. Within this area the Trust manages nature reserves at Gibraltar Point, Frampton Marsh and Moulton Marsh. As there is clear evidence that the extent of saltmarsh within the Wash is continuing to expand, LWT accepts that the proposal to hold the line in PDZ1 for the first epoch (to 2025) should have no adverse effects on biodiversity. However, Lincolnshire and other counties in the East Midlands have suffered a huge decline in wildlife over past years. The East	We acknowledge your support for the emerging policies from The Wash SMP 2 and confirm that the intent of the SMP is to set policy on how we manage our coastline against the threat of erosion and flood risk over a 100 year plan period. The current draft policy of 'Hold the Line' for PDZ1 recommends keeping pace with climate change which could see defences improved.  It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary. Where it becomes necessary to realign to provide a

			<p>Midlands Regional Plan requests a step change increase in biodiversity in the region and the Lincolnshire Sustainable Community Strategy is aiming for 'countryside, coastline and towns much richer in biodiversity' by 2030. LWT is pleased to note that consideration is given in the policy appraisal to 'maintain and if possible increase the area of mud flats, salt marsh, sand dunes and saline/coastal lagoons (where present)'. LWT can support the 'hold the line' policy for PDZ1 only if it does not preclude managed realignment schemes to create new wildlife habitat and increase the resilience of habitats and species to climate change. The socio-economic benefits of accessible managed realignment schemes are well illustrated at Freiston shore. The Skegness area has been identified as one of the most deprived areas within the East Midlands and one that would benefit more than most from provision of Green Infrastructure and accessible natural green space. The Trust notes that the need for ongoing research and monitoring is well recognised in order to detect changes and predict the time when saltmarsh accretion no longer keeps pace with sea level rise. This must include coastal processes at Gibraltar Point and the relationship both to the Wash and to the coastal environment to the north. Experience has shown that it can take a considerable time to plan for managed realignment in the most suitable locations: LWT would like to see identification of potential realignment sites within the first epoch. National funding should be made available for continued research and monitoring throughout the first epoch. LWT supports the proposals for PDZ1 in the second and third epoch. The Trust accepts that the uncertainties regarding continued saltmarsh accretion mean that it is not possible to predict the flood risk. Ongoing research and monitoring is required. Where managed realignment does take place, LWT considers that it should aim to maximise biodiversity benefits. LWT looks forward to contributing to development of the Action Plan which will accompany the SMP.</p>	<p>more sustainable sea defence to protect people and agriculture, opportunities will be taken to provide habitat replacement at the same time.. By managing our sea defences in this way we are able to reduce the risk of failure and give confidence by providing a good standard of protection around The Wash.</p> <p>The headline policies for PDZs 1, 2 and 3 of The Wash are Hold the Line. However due to the uncertainties around coastal erosion and sea level rise it is recognised that with further monitoring we may identify the need to undertake localised realignment (only if required) to maintain defence sustainability (to protect people and agriculture) and provide opportunities to replace the loss of habitat under current legislation.</p> <p>As part of the SMP2 Action Plan we are already in the process of setting up a monitoring programme and a strategic review of PDZs 2, 3 and 4. This will enable us to understand in more detail how the coastline is reacting to sea level rise.</p> <p>Through development of the Action Plan we will inform key stakeholders of how we can work collaboratively to manage these issues.</p> <p>All other corrections and omissions you identified in your response have been reviewed and any text changes will be agreed with our Client Steering Group.</p>
44	Northern Area Regional Flood Defence Committee	15/01/10	<p>A workshop was held on 15 January 2010 for Anglian Northern Area Flood Defence Committee to consider the draft Wash SMP2. Members supported the draft policies and wished to make the following comments:</p> <p>SMP needs to reference the benefits of having military ranges in the area.</p> <p>Clarity required on sediment transport system around The Wash and impact on saltmarsh.</p> <p>Should Hunstanton and Heacham have been included together in one policy zone as the two sites are interdependent on each other. Include greater reference to the history of how the marshes had been formed on the Wash and use of the training walls.</p> <p>Query whether the 75,000 properties affected (as quoted within the presentation) included towns such as Wisbech and Boston which would also be affected by changes on the coast. How are the boundaries of the Wash SMP set, do they include tidal estuaries?</p> <p>Further explanation required on Policy Zone 2 on why there were three different options for epochs 2 and 3.</p> <p>Does the SMP tie in with the Wash Bank Strategy/Fenland Strategy.</p> <p>Confirmation required that what 'hold the line policy' means for the various epochs and are standard of protection maintained.</p> <p>Plan should reference Coastal Change Pathfinder programme, which could provide help for landowners to fund future flood defence protection.</p>	<p>Thank you for your committee's response to The Wash SMP 2 public consultation received on 15 January 2010. We welcome your support for the draft management policies and would like to address each individual point raised, as follows. 1. <b>SMP needs to reference the benefits of having military ranges in the area.</b> This has been acknowledged and the amendments have been made in the light of this comment. 2. <b>Clarity required on sediment transport system around The Wash and impact on saltmarsh.</b> This has been acknowledged and the amendments have been made in the light of this comment. Please refer to appendix F for more details. 3. <b>Should Hunstanton and Heacham have been included together in one policy zone as the two sites are interdependent on each other.</b> A number of factors are considered when agreeing a preferred Policy Development Zone (PDZ) for the Shoreline Management Plan (SMP). Factors include characteristics of foreshore, defence type, values and land use, and how coastal processes work. However, this doesn't mean PDZs have to be independent of each other; the coastal processes relationship between the eastern PDZs is very important, and has been included in policy development in the objective regarding longshore impacts of policies. We recognise the importance, for other reasons, why this frontage is interdependent on each other and SMP has already developed an 'Action Plan' which brings these communities together in working together to manage coastal change. 4. <b>Include greater reference to the history of how the marshes had been formed on the Wash and use of the training walls.</b> This has been acknowledged and the amendments</p>

				<p>have been made in the light of this comment. 5. <b>Query whether the 75,000 properties affected (as quoted within the presentation) included towns such as Wisbech and Boston which would also be affected by changes on the coast.</b> In order to present properties at risk from coastal flooding we have used the flood zone map, which is the scenario without defences. The figure of 75,000 does include parts of Boston but does not include Wisbech. The reason for this is that without defences coastal flooding does not reach Wisbech as it would generally fill the coastal floodplain up to the A17. With defences we already know that Wisbech is at risk from the tidal Nene. 6. <b>How are the boundaries of the Wash SMP set, do they include tidal estuaries?</b> Yes, the boundaries of The Wash SMP do include parts of the tidal estuaries and are linked with the boundaries of the CFMP. 7. <b>Further explanation required on Policy Zone 2 on why there were three different options for epochs 2 and 3.</b> This has been acknowledged and the amendments have been made in the light of this comment. However, the CSG agreed to conditional policies on the basis that the evidence for accretion/erosion of the foreshore was inconclusive. This decision was also confirmed following discussions with both Natural England and Defra. 8. <b>Does the SMP tie in with the Wash Bank Strategy/Fenland Strategy.</b> Yes, The Wash SMP does tie into The Wash Bank and Fenland Strategies. 9. <b>Confirmation required that what 'hold the line policy' means for the various epochs and are standard of protection maintained.</b> Holding the line involves holding the defence on its existing alignment. However, the intent of the SMP, where we have a policy of 'Hold the Line' is to keep pace with climate change. This means we could see defences improved, which maintains the current standard of protection. 10. <b>Plan should reference Coastal Change Pathfinder programme, which could provide help for landowners to fund future flood defence protection.</b> This has been acknowledged and the amendments have been made in the light of this comment. We are currently developing the draft Action Plan which will incorporate information received through the consultation responses. This will be reviewed and endorsed by our Client Steering Group (CSG) and Elected Members Forum (EMF).</p>
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## **CONSULTATION ON THE STRATEGIC ENVIRONMENTAL ASSESSMENT ENVIRONMENTAL REPORT.**

As a result of comments received through the public consultation on the Strategic Environmental Assessment, an addendum was produced. The addendum provided clarifications on issues raised about the environmental impacts of the draft SMP on the environment of Wash.

The addendum was out for a 3 week public consultation, from Thursday 1 April 2010 until Thursday 22 April 2010, giving the public an additional opportunity to have their say. It was viewed and available for download from the Environment Agency website.

At the end of the consultation, three comments were received. These have been acknowledged by the project team.

**CONSULTATION REGISTER FOR THE CONSULTATION ON THE SEA ADDENDUM – 1 APRIL TO 22 APRIL 2010**

<b>S/NO</b>	<b>CONSULTEE</b>	<b>DATE RECEIVED</b>	<b>COMMENTS</b>	<b>ACTION/ RESPONSE</b>
1	<b>Brian L. Orde King's Lynn Internal Drainage Board</b>	<b>22/04/10</b>	<p>On behalf of King's Lynn Internal Drainage Board, I have been asked to provide comments on the above consultation document.</p> <p>The Board's district boundary is coincident with The Wash shoreline between the River Nene, within PDZ1, to the southern fringes of Hunstanton, where PDZ2 meets PDZ3. The Board has a pumping station at Wolferton, on the boundary between PDZ1 and PDZ2 and a sea outfall, through an EA maintained culvert, under South Promenade at Hunstanton towards the northern end of PDZ2. Other networks exist behind the sea defences, however these outfall into EA main rivers thence into the sea.</p> <p>Having reviewed the contents of the SEA and Addendum, there are no adverse comments and it was pleasing to note that, as well as developed and industrial areas and recognised environmental areas, specific consideration had been given to the land drainage networks and agricultural land and their contribution to the environmental diversity around The Wash.</p> <p>Thank you for this opportunity to comment.</p>	<p>I am writing to thank you for taking part in the public consultation on <b>The SEA Addendum for The Wash SMP 2</b>, which commenced on 1 April, 2010 and closed on 22 April, 2010.</p> <p>We appreciate your feedback, which is an indication of your interest in coastal flood and erosion issues around The Wash, and its proper management over the next 100 years.</p>
2	<b>Caroline Steel Lincolnshire Wildlife Trust</b>	<b>22/04/10</b>	<p>Thank you for consulting the Lincolnshire Wildlife Trust (LWT, the Trust) on the Addendum to the Wash Shoreline Management Plan (SMP) Strategic Environmental Assessment.</p> <p>Lincolnshire Wildlife Trust was remiss in not picking up that the wording of the earlier documents allowed for uncertainty. We had assumed that as soon as there was evidence of erosion, managed realignment would be provided: the Habitats Regulations are non-negotiable and require compensation. However, we are very happy to see this clarified. The Trust stands by its January submission ie that Grant in Aid is absolutely essential to enable sufficient monitoring to detect any changes in coastal processes and that potential managed realignment sites should be being identified as soon as possible within the first epoch.</p> <p>The Trust would like to take issue with the response from the Project manager to our original submission which states that <i>'It is not the intention of the SMP to give up land to the sea unless it is absolutely necessary.'</i> This is not in accord with Environment Agency and other public sector policies for conserving and enhancing biodiversity and bringing about benefits wherever possible.</p> <p><b>Specific points on Addendum to SEA</b></p> <ul style="list-style-type: none"> <li>We query why Table 1 starts with reference to agricultural land rather than protection of life, communities or internationally</li> </ul>	<p>Thank you for your response to the consultation on the SEA Environmental Report addendum for The Wash Shoreline Management Plan (SMP) 2, received on the 22 April, 2010;. Please find detailed below responses to your specific queries.</p> <p>1. We query why Table 1 starts with reference to agricultural land rather than protection of life, communities or internationally protected habitats.</p> <p><i>This was identified by the Client Steering Group of the SMP2 as being one of the primary issues with regards to the SMP and the order shown agreed. It is acknowledged that the order shown is not typical.</i></p> <p>2. Page 10 – under 'change to conditions of EU sites or habitats' – the second sentence is unclear.</p> <p><i>A minor negative score would be provided if an indirect adverse effect occurs through coastal processes or sea level rise.</i></p> <p>3. Page 10 – under 'change in priority BAP habitat' – if loss of habitat results in negative scoring, surely gains in habitat should be scored positively as a contribution</p>

			<p>protected habitats</p> <ul style="list-style-type: none"> <li>Page 10 – under 'change to conditions of EU sites or habitats' – the second sentence is unclear.</li> <li>Page 10 – under 'change in priority BAP habitat' – if loss of habitat results in negative scoring, surely gains in habitat should be scored positively as a contribution to UK, regional and/or local BAP targets? This would also be in accord with EA Outcome Measure 5.</li> <li>It would be clearer if there was separate text for SSSI scenario landward and seaward of sea wall (as per historic and archaeological features).</li> </ul>	<p>to UK, regional and/or local BAP targets? This would also be in accordance with EA Outcome Measure 5.</p> <p><i>For the purpose of the SMP, where there is no net loss of the overall area of BAP habitat and/or increases in the overall area of BAP habitat positive scores have been assigned. Gains in habitat are often based on the conversion of one BAP habitat to another type and as such the principle of no net loss is applicable.</i></p> <p>4. It would be clearer if there was separate text for SSSI scenario landward and seaward of sea wall (as per historic and archaeological features).</p> <p><i>The criteria developed were done so in consultation with Natural England and the Client Steering Group. It is important in the SEA process to provide a balance across all of the issues, and to avoid double counting across issues. Habitat is covered by a range of criteria (relating to differing designations).</i></p>
3	Stephen L. Sellers Fenland Wildfowlers' Association	22/04/10	<p><b>We want to hear from you to help us identify anything we may have missed in the preparation of this addendum.</b></p> <p>Whilst accepting that the SMP2 is a higher level document concerned with long term strategic planning, we have noted that in Table ! under "Threat to Biodiversity", Natural Processes combined with Management Measures have assumed that the outcome could be minor negative. It is possible that the outcome could be positive, ie accretion leading to an increase in wave action softening.</p> <p><b>Please tell us what you think about the SEA and it's addendum.</b></p> <p>Section 2</p> <p>Section 2.2 para 5 We note that work in progress with stakeholders may see a change to either wording or policy to define the effects of MR applied to PDZ1 in Epoch 2.</p> <p>Section 2.5.12 We would welcome further clarification of the significance of the effects as the composite of significance becomes apparent.</p> <p>Section 2.7.1 We note that the draft SMP2 did not provide certainty for the assumptions made concerning PDZ1 in Epoch 2 where an erosional scenario develops.</p> <p>Section 2.7.2 para 4 we note that there will be a requirement for re-assessment for Epoch 3, currently assigned as minor negative, as data becomes available. <i>The assumption is that a number of revisions of SMP and SMP Action Plan will have taken place in each Epoch.</i></p> <p>Section 2.8 para 3 We note that the SMP Action Plan is currently being developed and assume that this will provide future opportunities for further assessment of variables and their effect on the designated receptor.</p>	<p>I am writing to thank you for taking part in the public consultation on <b>The SEA Addendum for The Wash SMP 2</b>, which commenced on 1 April, 2010 and closed on 22 April, 2010.</p> <p>We appreciate your feedback, which is an indication of your interest in coastal flood and erosion issues around The Wash, and its proper management over the next 100 years.</p> <p>Your feedback on the SEA is important. As such, your comments have been forwarded to the consultants who are working on the final SMP document.</p>



