

# Appendix D - Consultation Responses

| Authority and Contact                          | Date Received   | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Actions  | Location of change (Section of Report)                                                          |
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| Steve Field<br>Restormel<br>Borough<br>Council | 24 June<br>2008 | Overall I would consider the East Cornwall CFMP draft report to be a very thorough and an excellent document.<br>I have identified a few minor possible discrepancies within the report:                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted    | No action                                                                                       |
|                                                |                 | On page 86, also within Appendix B Annex B page 177, and in the Form 12.6 page 183 of Appendix B Annex B - mention is made of the Newquay to Par branch line as lying within the 1 per cent a.p. flood area. I suspect that the area concerned is at Trenance, Newquay where the line crosses the Trenance Stream. However the line at this location crosses the valley via a high level viaduct and I would not therefore expect the railway track to be affected by flooding at this location. [The branch line might be affected by flooding at Luxulyan but this is outside of the East Cornwall catchment]. | Noted    | Reference to the Par to Newquay branch line at risk removed from the main report and appraisal. |
|                                                |                 | Page 92 of the report mentions a Major Incident Plan as being in place for flooding at Newquay - as far as I am aware there is no MIP dealing with flooding at Newquay.                                                                                                                                                                                                                                                                                                                                                                                                                                          | JD Amend | Reference to MIP at Newquay removed.                                                            |
|                                                |                 | Pages B34 and B40 refer to PPG25, this document has been replaced by the broadly similar document PPS25.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | JD Amend | PPS25 now quoted.                                                                               |

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|                                                                                   |                     | <p>In Appendix B Annex B page 67 the comment is made that 'river flooding from 10 per cent a. p. event is not expected in Lostwithiel'. Although this would be true when considering the River Fowey it would not surprise me if flooding were to occur from other rivers in Lostwithiel during a 10 per cent a.p. event, particularly from the main river that flows through Tanhouse Road and South Street which is prone to overtopping its banks on a fairly regular basis.</p> | <p>JD make clear source of flooding that is being considered.</p> | <p>Clarification added to policy appraisal that flooding would not be expected from the River Fowey in Lostwithiel from a 10 per cent event.</p> |
|                                                                                   |                     | <p>Finally in the Summary of the Draft Plan the black and white photo on page 9 looks to me as if it was taken in Fowey rather than Newquay.</p>                                                                                                                                                                                                                                                                                                                                    | <p>Environment Agency to address</p>                              |                                                                                                                                                  |
| <p>Gordon Trapmore<br/>Flood Risk Manager<br/>Environment Agency<br/>Cornwall</p> | <p>26 June 2008</p> | <p>I am disappointed to say that minor errors still remain within the text of every section of the report I looked at.</p>                                                                                                                                                                                                                                                                                                                                                          | <p>Final version to be proofread by experienced proof reader.</p> | <p>Proof reading completed and amendments made.</p>                                                                                              |
|                                                                                   |                     | <p>I have reviewed and tried to cross-reference the actions between policy units and find to my disappointment that there appear to be many generic actions which should relate to other policy units. Using the eleven actions in Fowey and Seaton I will try to explain what I think is missing under generic headings</p>                                                                                                                                                        | <p>RR to discuss with GT.</p>                                     | <p>Action Plan revised to reflect amendments discussed at meeting and to incorporate comments from Julian Payne.</p>                             |
|                                                                                   |                     | <p>Maintain SoP (item 2.1) – this type of item or similar is include for 3,4or 5 policy units. But it sometimes refers to SoP and sometimes does not? Please also clarify should we be using the term standard of service rather than standard of protection?</p>                                                                                                                                                                                                                   | <p>RR to discuss with GT</p>                                      |                                                                                                                                                  |

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|                       |               | Awareness/self help (item 2.2) – I think this action relates to all units even those which are policy 1 and 6. In fact explaining the need to undertake self help measures is the most important message to give to these residents.                                                                                         | RR to discuss with GT                                                                                  | This action included for all units except for Welcombe and Coombe Valley (P1) |
|                       |               | Surface Water Management Plans (item 2.4) - The generic reference is only mentioned for Fowey and Seaton and Camel Tidal, why not for some of the others.                                                                                                                                                                    | Based on policy choice as to whether this type of action can be carried forward. RR to discuss with GT | Add to camel Valley for Bodmin as policy choice of P4 now allows this.        |
|                       |               | Land Management (item 2.5) – I think this action relates to all policy units                                                                                                                                                                                                                                                 | RR to discuss with GT                                                                                  | Added to all units except for Welcombe and Coombe Valley (P1)                 |
|                       |               | Targeted Maintenance (item 2.8) – I think this action relates to all policy units.                                                                                                                                                                                                                                           | RR to discuss with GT                                                                                  | In action plan where it is essential.                                         |
|                       |               | Improvement of Flood Warnings – Reference to this is variable in the actions and the wording inconsistent. I am also uncomfortable with item 7.4 which relates to loss of life but has a indicative timescale of 2050 which suggests it is unimportant or we do not know what we want perhaps a slight re wording is needed. | RR to discuss with GT                                                                                  | Timescale reduced to 2014 to signify importance of the action.                |

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|                       |               | Invasive Species (item 2.11) – These are present in more the one catchment they are mentioned in.                                                                                                                                                                                                                                                                                                                                                                                                                                                   | RR to discuss with GT                                                             | Removed from action table on advice from Julian Payne– it is more of a general concern which is under control rather than a specific issue. |
|                       |               | Rapid Response Catchments – I see this action only for Boscastle/ North Coast. We should include this action for the policy units for Polperro, Camelford and Polmorla where such events have occurred in the last fifty years.                                                                                                                                                                                                                                                                                                                     | RR to discuss with GT                                                             | Action added for Polperro, Camelford and Polmorla.                                                                                          |
|                       |               | I am uncomfortable with the use of the word maintain instead of the word sustain. I think that if we specify the policy as 4 or 5 it must be sustain, while if we specify policy 3 it could be maintain. However the fact Bodmin TL is in a unit which is policy 3 makes this attempt at use of logic questionable. Please clarify what the regional/national thinking is on this. It maybe that we have to single out specific high risk locations that uncomfortably sit in units with policy of 3 or lower and say we will sustain these assets. | Consider changing Camel Valley to P4 – for Bodmin and Camelford. Logic then fits. | Camel Valley policy choice changed to P4. This means logic fits and sustain is used for policies 4 and 5.                                   |
|                       |               | I think a Surface Water Management Plan SWMP is need for Polperro and hence item 2.4 should relate to Liskeard and Polperro.                                                                                                                                                                                                                                                                                                                                                                                                                        | RR to discuss with GT                                                             | Action removed as only 1 incident of surface water flooding at Liskeard. Surface water issues can be addressed under Actions 2.1 and 2.11.  |

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|                       |               | <p>There is only one reference to a vulnerable emergency service /utility asset and that is at Bodmin. In view of Pitt this seems inadequate when they are others such as the sewage works at Wadebridge. Can we discuss what should be the right level of inclusion of such locations and what should we be saying about these assets.</p> | <p>Reference is specifically made in Action Plan to this because of the p3 choice and impact on critical infrastructure. If changes to p4 then this impact will remain the same as at present. Critical infrastructure is covered in main document and policy appraisal.</p> | <p>No change</p>                                         |
|                       |               | <p>I think the success criteria in 3.6 should cover surface water flooding as well as tidal</p>                                                                                                                                                                                                                                             | <p>RR to discuss with GT</p>                                                                                                                                                                                                                                                 | <p>Surface water included in action.</p>                 |
|                       |               | <p>I think 5.5 should be for Wadebridge and Padstow</p>                                                                                                                                                                                                                                                                                     | <p>RR to discuss with GT</p>                                                                                                                                                                                                                                                 | <p>Padstow included in action.</p>                       |
|                       |               | <p>I think 5.6 should be for Padstow and Sladesbridge as well as Polmorla and Wadebridge.</p>                                                                                                                                                                                                                                               | <p>RR to discuss with GT</p>                                                                                                                                                                                                                                                 | <p>No change (would be covered by SMP).</p>              |
|                       |               | <p>Not sure what item 7.8 refers to and why we are interested in wetland habitat in the upper catchment just in this policy unit.</p>                                                                                                                                                                                                       | <p>RR to discuss with GT</p>                                                                                                                                                                                                                                                 | <p>Action removed on advice from FRB / Julian Payne.</p> |

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| <p>Jim Garland on behalf of Development Control, Environment Agency Cornwall.</p> |               | <p>The introduction states that coastal flooding from the sea is an issue for the SMP, however many of the 'how we plan to manage flood risk' items relate to coastal (or tidal) flooding. Examples include reducing flood risk to Looe, Fowey and Wadebridge. Presumably these should not be in the CFMP and are an item for the SMP?</p>                                                                                                                          | <p>The CFMPs have always covered 'tidal' flooding particularly in estuary locations. The current SMP boundary does not include places like Wadebridge. We could add a sentence to say when the SMP2 is delivered actions relating to the tide will be superseded by those in the SMP.</p> | <p>More information added to section 2.1 and says SMP and CFMP must tie up to avoid duplication.</p> |
|                                                                                   |               | <p>Surface Water Management Plans have been mentioned for a couple of locations, we consider that Bodmin should also be included, especially the Bodmin Town Leat catchment. A management plan would be beneficial to address the capacity limitations in the culvert that flows through Bodmin and existing surface water flooding that impacts several areas in the town. An additional pressure is the amount of new development proposed in this catchment.</p> | <p>No SWMP for Bodmin in the Actions due to the policy choice chosen. If this changes to a P4 then a SWMP action will be included.</p>                                                                                                                                                    | <p>Camel valley policy choice changed to P4 and SWMP added to action plan.</p>                       |
|                                                                                   |               | <p>The issue of campsites in the floodplain could be mentioned as a specific issue, especially in areas such as North Coast Rivers and Bude and Stratton. As campsites are frequently located in the floodplains in Cornwall and raising awareness of flooding is important, especially if the frequency of events are to increase linked to climate change.</p>                                                                                                    | <p>Could add information to recreation section - Environment Agency would need to provide data if specific details required</p>                                                                                                                                                           | <p>Presence of campsites in floodplain acknowledged in Section 2.8.5.</p>                            |

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|                       |               | The very topical issue of surface water flooding impacts all areas covered in this CFMP - does more need to be proposed to address this issue at this stage of the CFMP.  | RR to discuss with GT                                                                                  | Locations of SWMP actions agreed with GT.      |
|                       |               | Could the statement regarding land use management (in the North Cornwall Rivers and Fowey Catchments) be strengthened, from 'investigate' to investigate and then manage? | RR to discuss with GT                                                                                  | Action plan wording agreed with GT. No change. |
|                       |               | Just as an overview has the impact of predicated climate change been fully considered in the CFMP?                                                                        | Section 4 explains how climate change has been considered. This is summarised in the Executive Summary | No change                                      |
|                       |               | Page 4 – main heading “We spend a significant amount each year on .....” Amount of what? Is this time, money?                                                             | Presume this is relating to the Summary leaflet. Action for RR.                                        | No change to CFMP report                       |
|                       |               | Page 4 – 2nd paragraph – Regarding average cost of flood damage - It is not clear where these costs are national / regional                                               | Presume this is relating to the Summary leaflet. Action for RR.                                        | No change to CFMP report                       |
|                       |               | Page 5 – Summary of key future flood risks – This statement does not give an answer to the statement i.e. Why will it increase                                            | Presume this is relating to the Summary leaflet. Action for RR.                                        | No change to CFMP report                       |
|                       |               | Page 9 – The picture is of <b>FOWEY</b> and not Newquay!!                                                                                                                 | Presume this is relating to the Summary leaflet. Action for RR.                                        | No change to CFMP report                       |

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|                                                  |               | <b><u>Summary of Consultation Draft Report</u></b>                                                                                                                                                                                                                                                                  |                                                                                                                  |                                        |
|                                                  |               | Page 11 – 3 <sup>rd</sup> Para, bullet point 3 would be better to say ..... “to avoid inappropriate development in areas at flood risk”<br>▪                                                                                                                                                                        | Presume this is relating to the Summary leaflet. Action for RR.                                                  | No change to CFMP report               |
|                                                  |               | ▪ Page 11 - Future changes, last para ..... Should this also include Newquay?<br>▪                                                                                                                                                                                                                                  | Presume this is relating to the Summary leaflet. Action for RR.                                                  | No change to CFMP report               |
|                                                  |               | ▪ General comment – up to page 113 it seems to repeat itself without saying anything<br>▪                                                                                                                                                                                                                           | We do not understand this comment                                                                                | No change                              |
|                                                  |               | ▪ Page 192 – Glossary – Main River – There should be a statement ..... “Flood Defence Consent should be obtained for any works within 7m of a main river”. (Water Resources Act 1991 (S109))<br>▪                                                                                                                   | RR to advise if additional items can be added to the Glossary.                                                   | No change at present                   |
|                                                  |               | ▪ Page 193 – Glossary –Non Main River – A statement re land drainage Act 1991 (Section 23) should be included<br>▪                                                                                                                                                                                                  | RR to advise if additional items can be added to the Glossary.                                                   | No change at present                   |
|                                                  |               | Throughout the report there is a mixture of the spelling of SuDS. I managed to find at least 3 variations e.g. pages 196 and 198 some parts of the document refer to sustainable drainage systems and some to sustainable urban drainage systems.... There should be consistence and I have flagged this up before. | Final report will be proof read thoroughly. Will be amended to SuDS and sustainable drainage systems throughout. | Action complete – throughout report.   |
| Page B40 - PPG25 referenced and not <b>PPS25</b> | OK            | Action complete – Environmental Report page B40                                                                                                                                                                                                                                                                     |                                                                                                                  |                                        |
| Trevor Renals Ecological Appraisal               | 4 June 2008   | Thanks for the East Cornwall CFMP. I have read it and can find no fault with it. If I had to be super critical, maybe the well-worn Polperro Volvo image on the cover could have been replaced by a slightly less well-worn Boscastle image.                                                                        | Presume this is relating to the Summary leaflet.                                                                 | No change to main report.              |



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| Environment Agency Cornwall.                                                                 |               | In future, it may be worth considering one or two text boxes, giving case histories of the major recent flood schemes in the area and the justification for them                                                                                                                                                                                                                                                                                                                                                                                                                                            | Action for RR.                                                                                               |                                        |
| Nick Russell<br>Assistant Inspector of Ancient Monuments Devon and Cornwall English Heritage |               | I have been passed a copy of your summary draft consultation report for the CFMP (27/5/08). Obviously it is not possible to make any detailed comments on the basis of the summary, however, I would offer the following observations.                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                              |                                        |
|                                                                                              |               | My colleague, Vanessa Straker commented in detail on aspects of your scoping report in her letter of 7 <sup>th</sup> July 2006 and I would confirm that the comments made then would still apply (appended below <A>).                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                              |                                        |
|                                                                                              |               | In addition I would take this opportunity to remind you of the need for advance consultation for all planned works, both with your in-house archaeologist (Ed Wilson), and with the Cornwall County Council Historic Environment Service who will be able to advise you of the likely impact of any proposed works. It is not unusual for apparently innocent flood defence works to present a threat to the Historic Environment, be that in the form of upstanding or buried remains. Early consultation will enable possible issues to be identified and coping strategies to be agreed and implemented. | We are not at this stage yet; when detailed design takes place the relevant consultation will be undertaken. |                                        |

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|                       |               | <p style="text-align: center;">&lt;A&gt;</p> <p><i>Thank you for asking English Heritage to comment on the above report. We welcome the inclusion of Section 2.11 on the Historic Environment and offer the following comments on this and other parts of the document.</i></p>                                                                                                                                                                        |                                                                                                                       |                                                                               |
|                       |               | <p><i>1. Figure 2.19 depicts the locations of scheduled monuments, Historic Parks and Gardens and other areas of historical value. It would be helpful if the text could make it clear that the Figure does not include the location of all the very numerous listed buildings and unscheduled monuments. Details of these can be found in the county's Historic Environment Record in Cornwall County Council's Historic Environment Service.</i></p> | <p>LC to add text under the figure.</p>                                                                               | <p>This figure has been removed from the report now.</p>                      |
|                       |               | <p><i>2. East Cornwall, and Bodmin Moor in particular, hold a unique palaeoenvironmental record of vegetation and climate change for the area, dating back as much as 12,000 years in some locations. This is to be found principally in the peats and organic sediments of the upland and valleys and could therefore be affected by CFMP measures.</i></p>                                                                                           | <p>Will be added to historic section in main report, opps/cons, Table 5.1, policy appraisal and gains and losses.</p> | <p>The main report now refers to this. It has been added to the PA tables</p> |

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|                                                                |                            | <p><i>3. Section 5.21 Consideration of historic environment interests will be important in the development of schemes for wetland recreation (or creation).</i></p>                                                                                                                                                                                                                                                                                                                                                            | As above                                                                                                                                                          | Noted                                  |
|                                                                |                            | <p><i>Section 6 J. Draft catchment objectives and indicators. Please amend the wording to embrace all historic environment assets and not just the designated sites and buildings.</i></p>                                                                                                                                                                                                                                                                                                                                     | Designated sites and buildings are listed as indicators as those are recorded/monitored. LC to check. Environment Agency requested local sites removed from CFMP. | Already included in objectives         |
|                                                                |                            | <p><i>I hope this is useful; please let me know if you would like any further clarification.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                   |                                        |
| Paul Cottington, SW Environment Adviser National Farmers Union | 26 <sup>th</sup> June 2008 | The South West NFU welcomes the opportunity to comment on the draft version of the East Cornwall Catchment Flood Management Plan (CFMP). The South West NFU represents approximately 10,000 Farmers and Growers across the region, with approximately 700 members in the Catchment area. Farmers have and wish to continue to be involved in the development of the CFMP. It is essential that their views are built in to the final plan due to the economic, social and environmental importance of the agricultural sector. | Noted                                                                                                                                                             | No change                              |

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|                       |               | <p>Cornwall is a highly productive agricultural area, benefiting from high grade soils, a favourable climate and an established business infrastructure and water supply. These businesses still make a major contribution to the local economy, through direct agricultural production and employment, trade with ancillary businesses and associated benefits for tourism and the wider community. With the growing importance of food security it is essential that farming and growing aspect of land use is considered when developing any plans that will affect future productivity.</p> | Noted                                                                                            | No change                              |
|                       |               | <p>The response to the draft consultation has been laid out in three parts. Firstly, we have noted key points. Secondly, we have been through the document and made comments directly on content. Thirdly, we have made a number of general comments as they did not fit into the draft plan and are important for the development of a robust CFMP.</p>                                                                                                                                                                                                                                        | Noted                                                                                            | No change                              |
|                       |               | <p><b>Key Issues</b></p> <p>The CFMP must include the effects of surface water from urban areas and developments</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | This is covered in section 3.2.3 and in the policy appraisal and action plan, where appropriate. | No change                              |

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|                       |               | <p>In some areas (typically in policy choice 6 areas but also elsewhere in the catchment) it proposes the withdrawal of maintenance from agricultural defences or their non-replacement at the end of their design life. It does not consider the impact on food production, the rural economy or discuss mechanisms for compensation other than via agri-environment schemes.</p> | <p>There are opportunities identified for the withdrawal of maintenance from agricultural defences or their non-replacement at the end of their design life, however there are no specific actions in the CFMP that relate to this.</p> <p>JD to add text to 2.6 to outline formal and inform use of rural land for flood storage.</p> | <p>No change</p> <p>No change – awaiting response from EA.</p> |
|                       |               | <p>Agri-environment schemes are viewed as a key mechanism for delivering land use change in the catchment. Regional agri-environment budgets are already stretched and it is clear that there would be insufficient funding from this source to meet the requirements of this plan.</p>                                                                                            | <p>RR to discuss with GT / National on how to address. This is reflected in part by the 2/3 funding score in the Action Plan in Table 7.1.</p>                                                                                                                                                                                         | <p>No change – awaiting response from EA.</p>                  |

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|                       |               | <p>The CFMP process does not consider current issues such as food security and while it mentions climate change in terms of increased flood risk it does not consider its global effect upon food production.</p>                                                                           | <p>Add food security to list in 4.2.2 as a pressure/influence on land management. Beyond scope to consider climate change in terms of global food production.</p>                               | <p>No change – awaiting response from EA.</p> |
|                       |               | <p>The heart of the issue for flooding lies not in looking for the provision of greater flood storage but in improving the flow and capacity of the river network within the catchment. Without this any new proposals are likely to fail.</p>                                              | <p>Disagree. A combination of management actions are required to manage flood risk. The Water framework Directive for example aims to encourage reconnection with the river and floodplain.</p> | <p>No change</p>                              |
|                       |               | <p><b><u>Comments related directly to the CFMP</u></b></p> <p><b>P.VI Executive summary</b><br/> On the whole the Executive Summary is very good. It lays out a clear and comprehensible analysis of the catchment and helps to develop a very good picture of the key flooding issues.</p> | <p>Thank you.</p>                                                                                                                                                                               | <p>No change</p>                              |

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|                       |               | <p>On page VIII the second comment references the difficulty of agreeing actions with landowners and the lack of influence over agricultural activities. Whilst the sentiment of this statement is understood it should be noted that farming and agriculture exists as businesses to meet the needs of society. These businesses are influenced by market forces and must exist in a very competitive sector. Any potential for offering other services such as flood storage must be done so within this framework. It is also essential that any initiative is backed up by good and well structured advice. This has been very successful with other initiatives such as the England Catchment Sensitive Farming Delivery Initiative.</p>                                   | <p>Noted. LC to consider re-wording the constraint.</p>                                                | <p>No change – awaiting response from EA.</p> |
|                       |               | <p><b>P.4 Links with other plans</b></p> <p>The way in which this plan looks to integrate with existing plans is excellent. We believe that the only way in which sustainable and appropriate flooding can be managed will be through just such an approach. However, we do think that the analysis should include strategies such as the Strategy for Sustainable Food and Farming and the Regional Implementation Plan for the Rural Development Programme for England. Using the plans that have been identified in this CFMP it is likely that we will have good biodiversity and protected developments and growth but no food to go with it. Any analysis must be about the whole land use and not focused onto specific issues at the expense of the bigger picture.</p> | <p>RR to advise if considered beyond scope of CFMP.</p>                                                | <p>No change – awaiting response from EA.</p> |
|                       |               | <p><b>P.10 Definition and extent of the catchments</b></p> <p>1. It is agreed that it is vital that the catchment is defined however, why does the second paragraph focus on the biodiversity and designated status of the area. This plan is defined as a Catchment “Flood” Management Plan it is not a biodiversity management plan. The environment as a whole defines the limits to the catchment and the biodiversity is a component of this. This is in the same way as the farmed landscape is a component of the whole environment. What is being described is land use and therefore the farmed landscape must be prioritised. This section has to be revised completely if it wishes to remain objective and robust.</p>                                              | <p>LC to review and cross refer to land use to balance the CFMP within the environment as a whole.</p> | <p>No change – awaiting response from EA.</p> |

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|                       |               | <p><b>P. 25 Land Use and Land Management</b></p> <p>2. Overall this is a very well presented and balanced section. It is good to see that broad role of farming is noted. Farming continues to play a crucial role in providing a landscape for residents and tourists and for delivering quality services such as water and biodiversity. Schemes like ELS are important but have to be seen in their deliverability. Farmers are very keen to be part of agri-environment but the current Environmental Stewardship process and options are not incentivising farmers to join. We would like to see this plan lead to focused advice and support for farmers to join ES and to ensure that the options are appropriate to their farming objectives and the wider objectives of the catchment. It should also be noted that opportunities for farmers to create new permissive paths is extremely limited. The current HLS schemes are very restricted in where they can operate. We would like to see other more local solutions to this issue.</p> | <p>JD to review wording of action.</p> <p>We are presenting current systems only.</p> <p>Beyond scope of CFMP</p> | <p>No change – awaiting response from EA.</p> |
|                       |               | <p>Given the economic factors, flood defences and associated maintenance should at least remain constant in order to reduce budget spend in future. The recent and continuing reductions in maintenance in rural areas will come back to haunt us. The NFU strongly believe the need for prioritisation of all the resources currently available toward high and medium risk systems would not be necessary, were the EA able to achieve better value for money from existing funds. We expect, given the additional funds committed by Defra for flood risk management activity following the events of last summer that the work programme for the 2008/09 year will look better. Drainage practices which increase infiltration and impede runoff rates have the potential to significantly reduce the speed of flow through a catchment in a flood event. But these practices are reliant on appropriate ‘main river’ maintenance.</p>                                                                                                            | <p>RR to discuss with GT.</p>                                                                                     | <p>No change – awaiting response from EA.</p> |



| Authority and Contact | Date Received | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Actions                                                                                                                                                                                                                         | Location of change (Section of Report)                         |
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|                       |               | <p>We appreciate that changes in land management can have a bearing on flood risk, and there is evidence for this at a local scale. However, at a larger catchment scale there is currently no evidence. At a larger scale, the impacts of land management change may well not impact flood risk, or have positive or negative effects. This is because impacts will always be catchment specific, based on the nature of the catchment and for example whether the changes mean that tributaries synchronise downstream. Practices that delay and reduce runoff and sediment transport could reduce peak flows but possibly increase the risks of flood peaks coinciding with some tributaries downstream. The impact of future changes in land use management across the CFMP is also uncertain.</p> | <p>The uncertainty of this is documented in the main report and policy appraisal and reflected in the wording of the action related to land management.</p> <p>We will improve wording in Section 2.6 to make this clearer.</p> | <p>No change</p> <p>No change – awaiting response from EA.</p> |
|                       |               | <p>Considerable uncertainties exist surrounding the use of land management change to benefit flood risk. These include:</p> <ul style="list-style-type: none"> <li>- what effect will land management change have on flood risk</li> <li>- how much area needs to be subject to change to have an impact on extreme events?</li> <li>- What changes are needed (and where) to produce a demonstrable benefit?</li> <li>- The impact on flood storage of removing or modifying flood defences around agricultural land (some embanked defences provide considerable storage behind them during extreme floods)</li> </ul>                                                                                                                                                                               | <p>As above</p>                                                                                                                                                                                                                 | <p>No change – awaiting response from EA.</p>                  |
|                       |               | <p>Evidence suggests that at higher flood frequency (lesser flood events) land management can make a difference on a local scale, however even at a local scale there is much less of an impact on less frequent, larger flood events. Therefore land management measures should only be viewed as part of a suite of possible options in terms of flood risk management alongside more traditional forms of 'flood defences'.</p>                                                                                                                                                                                                                                                                                                                                                                     | <p>Indeed. This is reflected in the range of flood risk management actions presented in the action plan.</p>                                                                                                                    | <p>No change</p>                                               |

| Authority and Contact | Date Received | Comments                                                                                                                                                                                                                                                                                                                                                                                                     | Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Location of change (Section of Report) |
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|                       |               | <p><b>P.66 Sources and Probability of Flooding</b></p> <p>The table shows that the vast majority of flooding incidents have been caused by channel capacity being exceeded. This is an issue that we have noted in many of the other catchments it SW. Any plans that are developed with regard to flooding must include improving channel capacity. A baseline should be developed and then maintained.</p> | <p>Flooding is a process in which natural channel capacity will be exceeded regularly. Indeed most flooding incidents are due to exceedence of channel capacity. Improvements to channel capacity could be one of a number of measures to be considered within actions identified for certain high risk locations in Table 7.1, however, this is not something that we would advocate on a blanket basis, particularly in the light of the aims of the Water Framework Directive.</p> | <p>No change</p>                       |

| Authority and Contact | Date Received | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Actions                                                                                                                   | Location of change (Section of Report)        |
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|                       |               | <p>Describes the impact of surface water run off. All of the points made are to some extent valid but need to be put in to context. Farmers are fully aware of the impact of machinery on soils. The management of soils is a crucial part of the development of a good crop. It would be useful to see this plan create opportunities for farmers to develop soil management plans (now not available through ES) and development of minimum tillage techniques.</p>                                                                                                                                                             | <p>Add mention of soil management plans in the land management section where Environmental Stewardship is considered.</p> | <p>No change – awaiting response from EA.</p> |
|                       |               | <p><b>P.102 Future changes</b><br/> The analysis given is excellent. We would include under the land use management the potential impact of food security issues. The UK situation has changed considerably in the past year or so with massive increases in commodity prices and a parallel increase in input costs. The overall industry picture is mixed with some sectors fairing better than others. What is important to note is the increased need for developing UK food security and the need for protecting agricultural land for its productive capacity.</p>                                                          | <p>Noted</p>                                                                                                              |                                               |
|                       |               | <p><b><u>General comments related to the CFMP</u></b><br/> <b>Economics</b><br/> The CFMP correctly (or should?) acknowledges the importance of Best and Most Versatile (BMV) agricultural land within the catchment. A sustainable agricultural industry in the UK is critical. In light of increasing populations, evolving human diets and climate change, we will become increasingly dependent on our agricultural land for food production. The economics of agricultural commodities are changing rapidly and therefore it can be difficult for us to appreciate the importance food security will have in the future.</p> | <p>Add food security to section 4 general future changes.</p>                                                             | <p>No change – awaiting response from EA.</p> |
|                       |               | <p>When flooding occurs on agricultural land there are also knock on effects on the local economy, if agricultural operations cease and crops are destroyed or grazing capability lost the associated and ancillary industries suffer. Given the rural area as a proportion of the catchment in question there is potential for a significant economic impact from flood events.</p>                                                                                                                                                                                                                                              | <p>Agricultural damages are based on current Defra Guidance / Multi -coloured manual.</p>                                 | <p>No change</p>                              |

| Authority and Contact | Date Received | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Actions                                                                                                     | Location of change (Section of Report)                         |
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|                       |               | <p>3. The Flooding Foresight work concluded that there would be much more flooding in future. It made the projection that agricultural land would experience the greatest increase in the level of damage in future. We are in agreement with the scenarios projected within this plan but have reservations about the lifespan of 100 years. There are so many uncertainties about the future of the agricultural industry at present that it's difficult to predict where we'll be even 12 months from now.</p>                                                                                                                                                                                                                                                                                                                          | <p>The CFMP does indicate the uncertainty surrounding future change, particularly with land management.</p> | <p>No change</p>                                               |
|                       |               | <p><b>EA Responsibilities</b></p> <p>a) Under the Environment Act 1995, Section 7, it is the Environment Agency's duty to any proposal relating to any functions of the Agency to have regard to any effect which the proposals would have on the economic and social well-being of local communities in rural areas. It is not clear how the CFMPs proposals fit with this legal duty of the Environment Agency.</p>                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>RR to consider response.</p>                                                                             | <p>No change – awaiting response from EA.</p>                  |
|                       |               | <p><b>Environmental Stewardship</b></p> <p>The suggestion that an opportunity exists to manage the flood alleviation basins (or other such schemes) through Higher Level Stewardship (HLS) shows a complete lack of understanding of Environmental Stewardship and its aims. Whilst the strapline suggests HLS is open to all landowners, it is a competitive scheme driven by targets set with the aim of achieving specific environmental objectives with a finite budget. It would be wrong to view this fund as the principal means via which flooding can be reduced within the East Cornwall catchment. It should also be recognised that flooding is only a secondary objective of Environmental Stewardship and will only be considered as a spin-off benefit from management designed to achieve the five primary objectives.</p> | <p>Land management considered as one of a range of options.</p> <p>Make clearer in section 2.6.1.</p>       | <p>No change</p> <p>No change – awaiting response from EA.</p> |

| Authority and Contact                                                           | Date Received | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Actions  | Location of change (Section of Report) |
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|                                                                                 |               | <p>The East Cornwall CFMP suggests funding for flood storage areas will come from Environmental Stewardship. If storage areas are to be created to give optimum benefit, washlands rather than wetlands are the obvious choice. Given the lesser biodiversity benefits that washlands produce Natural England are unlikely to consider such a scheme appropriate for agri-environment funding unless other primary objectives can be met. In addition Environmental Stewardship compensates for income foregone, flood storage areas will require management which has not been factored into HLS payment rates. Finally, HLS is a 10 year scheme, the CFMP a 100 year plan, can an overarching strategic document be so prescriptive given the potential uncertainty regarding continuous participation in a scheme with a comparatively short term nature?</p> | As above | No change                              |
|                                                                                 |               | <p><b>Conclusion</b></p> <p>b) The NFU welcomes the opportunity to comment on the draft of the East Cornwall CFMP. Of the plans we have reviewed to date this is the most robust and understandable. There are a number of areas mentioned above which must be addressed and we look forward to working with you to achieve this.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |          |                                        |
| David Hazlehurst<br>Land Management and Conservation Advisor<br>Natural England | 16 June 2008  | <p>Thank you for your consultation dated 27 May 2008. Natural England has the following comments.</p> <p>We welcome and support the preparation of this plan which sets out a strategic approach to the management of flood risk in the east Cornwall catchments. The draft plan appears to provide a comprehensive assessment of the context and issues relating to managing flood risk.</p> <p>Natural England supports the principal and proposals identified in the plan for floodplain restoration and habitat or wetland creation through the removal, modification or set back of flood defences where appropriate in order to enhance rivers and deliver biodiversity and amenity benefits.</p>                                                                                                                                                          | Noted    |                                        |
|                                                                                 |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted    |                                        |

| Authority and Contact | Date Received | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Actions                                                                                                                                                                                                                                                    | Location of change (Section of Report)                                                                                                                                                              |
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|                       |               | <p>At present it is not clear how the actions listed in the first column of Table 7.1 Action Plan have been derived. The plan would be improved by establishing a clear linkage between the actions listed in this table and the appraisal of opportunities and constraints as set out in Table 6.4 which can be linked back to the objectives, opportunities and constraints identified in Table 5.1. In order for the plan to be robust it is necessary to establish clear links between the objectives for the catchment and the actions that will deliver those objectives.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>Sign post added to section 7 as agreed with RR</p>                                                                                                                                                                                                      | <p>Text in section 7.1</p>                                                                                                                                                                          |
|                       |               | <p>We have comments on specific points as follows:</p> <p><b>Page 99, 4.2.2 Land Use Management</b><br/>This section should include reference to the Catchment Sensitive Farming (CSF) initiative which is targeting the catchment of the River Camel Valley &amp; Tributaries Site of Special Scientific Interest.</p> <p><b>Pages 132 – 139, Table 6.4 Policy Appraisal Summaries for each Policy Unit</b><br/>Some of the comments on Table 5.1 apply to the list of opportunities and constraints in Table 6.4. A number of actions listed as catchment wide actions in Table 6.4 are actually specific to particular rivers or locations. These actions would be more appropriately included in Table 7.1 Action Plan.</p> <p><b>Pages 144 – 167, Table 7.1 Action Plan</b><br/>No actions have been listed to investigate opportunities for habitat creation and managed realignment particularly in policy unit Camel Tidal where opportunities have already been identified by partner organisations at Amble Marshes and Sladesbridge.</p> | <p>JD add to main report.</p> <p>Don't understand comment – no actions are shown in Table 6.4. LC to seek clarification.</p> <p>Freshwater habitat/realignment is now being investigated at Amble Marshes. Realignment works at Sladesbridge in place.</p> | <p>Text added to Section 2.6.1 to refer to CSF as another initiative seeking to reduce runoff and diffuse pollution.</p> <p>LC asked NE for clarification. NO response to date</p> <p>No action</p> |

| Authority and Contact                                                                                                                   | Date Received | Comments                                                                                                                                                                                                                                                                                                                                                                                                                          | Actions                      | Location of change (Section of Report)                                                                                                    |
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|                                                                                                                                         |               | <p><b>Pages 144, 147, 150, 151, 154 and 163, Table 7.1 Action Plan</b><br/>           The actions to encourage landowners to join Environmental Stewardship (ES) programmes will not necessarily deliver flood risk management benefits. In order to be effective, this action will require the uptake of appropriate ES options on land where flood risk management benefits are likely to be deliverable.</p>                   | Action plan wording amended. | Table 7.1 “where this is likely to have an impact.” Added.                                                                                |
|                                                                                                                                         |               | <p><b>Page 149, Table 7.1 Action Plan</b><br/>           Action to control invasive species particularly on the River Camel should be informed by the County non native invasive plants project.</p>                                                                                                                                                                                                                              | Will add to Action wording   | Action removed from action plan as no specific locations are problematic – the general concern regarding Japanese knotweed is in control. |
|                                                                                                                                         |               | <p>I hope that these points are helpful. Should you have any queries or require clarification about any of the points raised please do not hesitate to get in touch.</p>                                                                                                                                                                                                                                                          |                              |                                                                                                                                           |
| Stephen Bohane<br>Head of Business Development - Cornwall and the Isles of Scilly<br>South West of England Regional Development Agency. | 24 June 2008  | <p>Thank you for sending us a copy of this document via our Exeter office.</p> <p>Our general approach to developing a sustainable economy in the South West is set out on our website: <a href="http://www.southwestrda.org.uk">www.southwestrda.org.uk</a>. This contains a strong commitment to the environment and a corporate objective to reduce the region's contribution of greenhouse gas emissions relative to GVA.</p> | Noted                        | No action                                                                                                                                 |



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|                       |               | <p>Within the area covered by your plan, we own land or buildings at a number of sites especially:</p> <ul style="list-style-type: none"> <li>• Bodmin : Beacon Technology Park</li> <li>• Bude-Stratton : Exelgen (formerly Tripos)</li> <li>• Indian Queens industrial Estate</li> <li>• St. Columb Major Business Park</li> </ul> <p>In developing these sites ourselves, or in grant aiding others to do so, we expect developers to:</p> <ol style="list-style-type: none"> <li>1. achieve at least a BREEAM excellent standard in both pre and post construction stages;</li> <li>2. maximise the opportunities for increasing biodiversity and ecology;</li> <li>3. achieve the highest viable levels of adaptability to meet the demands of climate change;</li> <li>4. include the provision of a private waste reuse/recycling/treatment system. This will often include rainwater or grey water recovery systems;</li> <li>5. use whole life costing to make decisions on materials and design.</li> </ol> | Noted   | No action                              |
|                       |               | I hope this is helpful. Please come back to me if there are specific points you wish to discuss.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |         |                                        |



| Authority and Contact | Date Received | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Actions                    | Location of change (Section of Report)                                                                                                                                                                                          |
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| NEAS                  | 25/07/08      | <p><b>HR01 Form</b></p> <ul style="list-style-type: none"> <li>• Section 9 – Extent to which hazards have been considered is unclear. Generic hazards should be included in the middle column and then confirmed as likely to occur or not in the third column. This has been done for some but not others.</li> <li>• Section 10c – Are there any other plans and projects that should be considered?</li> <li>• Section 11 doesn't read very well and doesn't seem to accurately reflect the judgement made in Section 9. It suggests that the River Carmel SAC and T-M-C Coast SAC have intertidal habitats and these include the oakwood interest features?</li> <li>• Section 12 – List those SACs that are likely to be effected.</li> </ul> | LC to address all comments | <p>Hazards amended to reflect requested structure.</p> <p>Policies and Plans were discussed with Sam Timbrell at time of writing, none to add.</p> <p>Section 11 reworded to make more sense</p> <p>SAC added to Section 12</p> |

| Authority and Contact | Date Received | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Actions | Location of change (Section of Report)                                                                                    |
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|                       |               | <p><b>Table 4a</b></p> <ul style="list-style-type: none"> <li>“Can adverse affects be avoided’ – Some of the justifications provided are not sufficient. We cannot simply state that the impacts will be considered in more detail at the project/strategy stage as this only implies that we will reconsider the effect at a later stage (i.e. Polruan to Polperro – modelling to ensure maintenance of the variety of hydrological and drainage patterns on site – this measure does not avoid the impact but suggests assessment of the impact at a later date). What happens if we get to that stage and find that we cannot avoid/mitigate the impacts? We need to ensure that the policy can be implemented in such a way that it will not have a significant affect on the interest features, i.e., can we include actions in the action plan that will avoid/prevent the impact (PM will need to approve these measures)? If a policy is likely to cause significant effect we need to place constraints on how it will be implemented, these constraints must be detailed here and within the action plan.</li> </ul> <p>For instance in the Polruan to Polperro example, we need to commit that the policy can be implemented in a manner that will not have significant effect on hydrological and drainage patterns on site (as long as this is the case – needs checking). This is the type of commitment that Natural England will be looking for.</p> <p>The need for modelling, etc, will support the decision above, and will be there to highlight the key sources of impact that need to be checked for at the next level of appraisal.</p> <p>Please ensure that avoidance measures have been identified for all of the hazards listed within column 1 of Table 4a, unclear whether this is currently being done. Also you will need Project Managers to agree on whether avoidance measures are achievable.</p> <ul style="list-style-type: none"> <li>“Adverse affect on integrity; long term, short term. Yes, No or uncertain?” – Please check this column for each of the designated site as there are errors in a number of them e.g. River Camel SAC, Semi-natural woodland, the column currently includes “Semi-natural woodland” when it should state whether or not there is an adverse affect, as title suggests.</li> </ul> |         | <p>The wording was written in consultation with Samantha Timbrell, NEAS officer. It has been reworded.</p> <p>Amended</p> |

| Authority and Contact              | Date Received | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Actions                    | Location of change (Section of Report)            |
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| Emma Herrera<br>Environment Agency | 25/07/08      | <p>HR01:</p> <ul style="list-style-type: none"> <li>- Section 9 Generic hazards from the sensitivity matrix in the main guidance (347_07) should be included in the middle column and then confirmed as likely to occur or not (pathway) in the third column. This has been done for some sites but not others.</li> <li>- Section 9 - I'm not convinced that whether or not the SAC/SPA is within the 1 per cent a.p. floodplain is the most useful/clear way to exclude the site from further assessment in Section 9, or at least not without a map that shows where it is. Similarly for some sites a judgement has been made that a P4 option won't affect a site because the site isn't near any watercourses with existing flood defences. But presumably P4 could include changes to drainage/land management in the wider catchment that could affect the site even if it isn't anywhere near existing flood defences? There are some other inconsistencies, e.g. for Polruan to Polperro SAC vegetated sea cliffs are excluded because they 'lie on slopes and are not influenced by flooding' but for Tintagel-Marsland-Clovelly Coast SAC they're excluded because they are 'influenced by maritime proximity and rainfall' and 'The CFMP is not expected to influence these factors. This is a very simplistic statement to make - of course the CFMP doesn't influence rainfall.</li> <li>- Section 11 doesn't read very well and doesn't seem to accurately reflect the judgements made in Section 9. It suggests that the River Camel SAC and T-M-C Coast SAC have intertidal habitats and these include the oakwood interest features??</li> </ul> | LC to address all comments | <p>See above</p> <p>Reworded</p> <p>See above</p> |
|                                    |               | <p>HR02:</p> <ul style="list-style-type: none"> <li>-Table should now only show CFMP components that are assessed as having a likely significant effect.</li> <li>- Overall the structure of the HR02 is fine</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                            |                                                   |