

Appendix D - Consultation Responses Received and Implementation in Final HRA Documents



Document Title:		Draft AA Scoping Report		Project No.:	9T2052	To be returned to:		T Eggiman	
General Comments:				Reviewer:		Organisation:		NFDC	
Comments: Further detail on the proposed AA methodology (section 3.3) outlining the level of detail and how impacts will be assessed could be included. Will the draft AA carried out on the proposed policies be circulated to ALL the CSG for consultation? This report states consultation will be with Natural England, Environment Agency, National Trust and RSPB.									
Page No.	Paragraph	Line	Comment	Name	Date	RH Response	Name	Date	
1	1.1.2	3	to determine whether the proposed plan or project will not have an adverse effect'	NFDC	11-Aug-09	Edited.	PT	16-Dec-09	
8	2.1.12		Conservation objectives for Solent Southampton water SPA also include coastal grazing marsh, terrestrial grassland and vegetated shingle which support Annex 1 & migratory species	NFDC	11-Aug-09	Added.	PT	16-Dec-09	
9	2.1.16		Conservation objectives for Solent Maritime SAC also include: Shifting white dunes with <i>Ammophila arenaria</i> Annual vegetation drift lines and Perennial vegetation stony banks .	NFDC	11-Aug-09	Added.	PT	16-Dec-09	
9	2.1.16	2	Reedbeds are not a designated habitat as part of Solent Maritime SAC	NFDC	11-Aug-09	Deleted.	PT	16-Dec-09	
23	3.3.2	6	how will each Policy unit be 'evaluated' will the AA quantify effects e.g. calculate impacts to site features and what data will be used	NFDC	11-Aug-09	Added paragraph 3.3.2 in the final Scoping and 2.3.3 in the HRA to provide indication of information and derivation of assessment.	PT	16-Dec-09	
24	3.3.5	1	typo replace 'will' with 'with'	NFDC	11-Aug-09	Edited.	PT	16-Dec-09	
24	3.35.5	1	supporting analysis'- further detail on what this would involve would be useful	NFDC	11-Aug-09	This refers to a commentary that is provided to indicate the overall reasoning behind a policy decision, as deduced from the SMP PDZ reports. However, where adverse affect arises, alternative solution discussion will provide more detail.	PT	16-Dec-09	
39			Glossary of terms: AA/HRA also determines whether the plan will not have an adverse effect on the integrity of a European site	NFDC	11-Aug-09	Edited.	PT	16-Dec-09	
	Appendix 2		Include shifting white dunes with <i>Ammophila arenaria</i> as Solent Maritime SAC feature in tables	NFDC	11-Aug-09	Included.	PT	16-Dec-09	

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General Comments:				Reviewer:	D Harlow	Organisation:	Bournemouth BC	
Comments - Very crisply written - I know little about the subject, but it was a pleasure to read!								
Page No.	Paragraph	Line	Comment	Name	Date	RH Response	Name	Date
ii	2		2.1 etc numbering wrong	D Harlow	13-Aug-09	Numbering check and edited.	PT	16-Dec-09
ii	6		6.1 numbering wrong	D Harlow	13-Aug-09	Numbering check and edited.	PT	16-Dec-09
1	2	2	First use of SMP2 - probably blindingly obvious, but for consistency, should spell it out in full then introduce acronym.	D Harlow	13-Aug-09	Added.	PT	16-Dec-09
2	1	4	"These two documents" shouldn't that be three ?	D Harlow	13-Aug-09	Edited wording.	PT	16-Dec-09
2	2	4	First use of RSS - should spell it out in full then introduce acronym.	D Harlow	13-Aug-09	Added.	PT	16-Dec-09
2	6	last	is it worth listing PDC, BoP, BBC, CBC and NFDC as the 5 LAs, as someone might assume it was Dorset and Hampshire County Councils.	D Harlow	13-Aug-09	Added.	PT	16-Dec-09
10	1	3	delete "during the breeding the season"	D Harlow	13-Aug-09	Deleted.	PT	16-Dec-09
17	1	3	I haven't come across " annual vegetation of drift lines " before - is this plants growing on seaweed strand lines, or something else??	D Harlow	13-Aug-09	It is basically put, vegetation colonising along the drift line and is fairly rare.	PT	16-Dec-09
18	4	last	delete "also been widely been recorded."	D Harlow	13-Aug-09	Deleted.	PT	16-Dec-09
19	2	2	change "arrange" to " a range "	D Harlow	13-Aug-09	Edited.	PT	16-Dec-09
19	2	2	delete "such as seal level rise"	D Harlow	13-Aug-09	Deleted.	PT	16-Dec-09
19	2	3	not quite sure if " agricultural activities key issues, " is what was meant??	D Harlow	13-Aug-09	Edited.	PT	16-Dec-09
19	3	2	insert "River Avon are important"	D Harlow	13-Aug-09	Edited.	PT	16-Dec-09
21	1	4	I believe first use of "Appropriate Assessment". Introduce the acronym (AA)	D Harlow	13-Aug-09	Added at start of document.	PT	16-Dec-09
21	table 3.1		Uses Appropriate Assessment in full 5 times, could use AA instead.	D Harlow	13-Aug-09	Edited to AA.	PT	16-Dec-09
21	Table 1		Final description- "its policy or allocation " - didn't make sense to me?	D Harlow	13-Aug-09	Edited for clarity.	PT	16-Dec-09
24	4	9	explain acronym ECJ	D Harlow	13-Aug-09	Included full name.	PT	16-Dec-09
24	4	10	insert "as rigorous an assessment"	D Harlow	13-Aug-09	Added.	PT	16-Dec-09
25	1	7	"effects of coastal" -change to on	D Harlow	13-Aug-09	Edited.	PT	16-Dec-09
25	3	2	insert "would not have an adverse effect"	D Harlow	13-Aug-09	Edited.	PT	16-Dec-09
27	1	7	should not BBC be replaced by the SMP Client Steering Group (Lead Authority BBC)	D Harlow	13-Aug-09	Have edited this to SMP2 Client Steering Group only.	PT	16-Dec-09
29	2		should East Dorset District Council be listed here? What part of their land is affected by the SMP?	D Harlow	13-Aug-09	Deleted East Dorset as they are not affected or influence the SMP or Sites.	PT	16-Dec-09
30	2	3	explain acronym IPPC	D Harlow	13-Aug-09	Included explanation.	PT	16-Dec-09
39	4	7	delete "the following"	D Harlow	13-Aug-09	Deleted.	PT	16-Dec-09
40	11	4	explain who " us " is - presumably this was lifted from an EA document, and " us " could be replaced by " the Environment Agency " ?	D Harlow	13-Aug-09	Added EA.	PT	16-Dec-09
47	4	2	(Count et at 1997) should be as at	D Harlow	13-Aug-09	Edited.	PT	16-Dec-09
50	2	7	not quite sure about "" unique in Britain and Europe for their hydrographic regime of four tides per day, " It is certainly true that the area is centred on a decayed amphidromic point, which gives small tidal ranges, and also causes double high tides, double low tides, and tide stands, at different locations.....	D Harlow	13-Aug-09	From JNCC document, will leave as it is.	PT	16-Dec-09
55	3	1	all as comment on Page 17.	D Harlow	13-Aug-09	See response above.	PT	16-Dec-09
55	7	1	Early gentian Gentianella anglica: should not be italicised	D Harlow	13-Aug-09	Edited.	PT	16-Dec-09
57			apologies, I did not read from here on!	D Harlow	13-Aug-09	Noted.	PT	16-Dec-09

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Document Title:			Draft AA Scoping Report	Project No.:	9T2052	To be returned to:	T Eggiman	
General Comments:				Reviewer:	N Horns	Organisation:	Natural England	
Comments : In general the report should reflect the precautionary principle of the Habitats Regulations, the Appropriate Assessment should consider whether the plan will or will not result in a conclusion of can not conclude no adverse effect, in addition to the conclusion of can or can not conclude no adverse affect; as detailed in section 3, table 3.1.								
Page No.	Paragraph	Line	Comment	Name	Date	RH Response	Name	Date
1	1.1.2		Integrity is define in the ODPM Government Circular: Biodiversity and Geological conservation, August 2005 not PPS9.	A Nicholson	11-Aug-09	Have edited in relation to site integrity.	PT	16-Dec-09
1	1.1.5		Favourable conservation status is defined in the Habitats Directive, you should be mindful of this in addition to the conservation objectives in determining favourable conservation status.	A Nicholson	11-Aug-09	Noted.	PT	16-Dec-09
8	2.1.13		Consideration should also be given to impacts such as disturbance and loss of supporting habitat, to SPA interest outside the boundaries of the site.	N Horns	11-Aug-09	We have identified supporting habitats as noted in the site citations. Where data and information exists regarding supporting habitats this has been incorporated into the site interest features.	PT	16-Dec-09
12	2.1.32		Coastal squeeze in its normal usage is not a factor that contributes to unfavourable condition for this site. Does it mean squeeze between development and the shoreline?	A Nicholson	11-Aug-09	Extracted from the SSSI site condition tables.	PT	16-Dec-09
15	2.1.41		Remove ' existing and proposed flood defences and coastal protection works, coastal squeeze of intertidal habitats due to coastal erosion.....and manitenance including dredging' from 'The primary factors..... ' These are not primary factors infuencing Dorset Heaths SAC. There are no intertidal habitats in the Dorest heaths SAC so as with above, coastal squeeze is not appropriate. Existing or proposed flood defence is an issue for only a very small part of the site - unless there are new major flood defence works proposed.	S Burton/A Nicholson	11-Aug-09	These were extracted from the SSSI site condition tables (NE) for the SSSI units within the Dorset Heaths SAC.	PT	16-Dec-09
16	2.1.42		There are no raised bogs	A Nicholson	11-Aug-09	Deleted.	PT	16-Dec-09
16	2.1.45		There are no longer any active mineral permissions affeing the SAC	A Nicholson	11-Aug-09	Deleted.	PT	16-Dec-09
16	2.1.46		Again there are no raised bogs	A Nicholson	11-Aug-09	Deleted.	PT	16-Dec-09
16	2.1.49		The permissions have been reviewed and no longer threaten site integrity	A Nicholson	11-Aug-09	Deleted.	PT	16-Dec-09
24	3.3.6		We advise that the impacts are identified to a reasonable level, including the cumulative impacts of policies across the N2K sites for issues such as coastal squeeze, high tide roosts. That the cumulative impacts are reflected to a reasonable level of confidence to enable a strategic approach to compensation/mitigation measures for the SMP or sections of the SMP such as Poole Harbour, Christchurch Bay. Allowing co-ordinated strategic delivery of compensation/mitigation measures such as realignment sites rather than piecemeal at a scheme level. This will also inform the need to deliver replacement habitats such as freshwater or grazing marsh in advance of a scheme, allowing for the time lag in the habitat achieving a reasonable functional level.	N Horns	11-Aug-09	Cumulative impacts looked at strategically, but with the intent of providing long term indications of compensation/mitigation requirements.	PT	16-Dec-09
25	3.3.8		In-combination also needs to consider the cumulative/in-combination impact of all SMP policies on N2K interest features, and impacts between similar interest features in nearby N2K sites such as bird interests where populations maybe linked.	N Horns	11-Aug-09	In-combination affects between all sites examined will be undertaken.	PT	16-Dec-09
25	3.3.10		The precautionary approach should be applied, of can or can not conclude no adverse effect on integrity. You should not be looking to prove that there is an adverse effect, rather that there is not one.	N Horns	11-Aug-09	Edited wording.	PT	16-Dec-09

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25	3.3.10		There is confusion between mitigation that removes the effect on integrity – which would not be habitat creation – and compensatory measures. If the SMP is determined to have an adverse effect on integrity of any European sites then the first stage is to mitigation measures (not compensation) within the plan can remove the effects. If this is not possible then we move to Regulation 49 and IROPI, alternatives and compensation under regulation 53. As far as mitigation to remove effects on site integrity the SMP should at least show that the mitigation is possible in principle, that there is a reasonable prospect of it being secured and that proposals could not be implemented without the mitigation. Similar principles would apply to compensatory measures and they would certainly need to be identified at the SMP stage.	A Nicholson	11-Aug-09	Have provided more clarity in wording over process flow - impact - prevention/mitigation - alternatives - IROPI - compensation.	PT	16-Dec-09
25	3.3.10		Grey Box - The EA Habitat creation scheme should not be considered as 'banking' rather as a strategic approach to habitat compensation/ coastal realignment for SMP policies rather than adhoc at scheme level.	N Horns	11-Aug-09	Reworded.	PT	16-Dec-09
25	3.3.10		Grey Box, Bold Text - the extent to which mitigation and/or compensation measures need to be secured at SMP2 stage is a developing area of work. Due to the short consultation time for this document and staff changes we are unable to answer this question at present, but it is certainly something we will look to inform you on in due course.	N Horns	11-Aug-09	Noted with thanks.	PT	16-Dec-09
26	3.3.11		There is a need to identify N2K impacts to a reasonable level of detail, if measures are to be proposed to offset impacts. For example if the policy will result in the loss of Xha of saltmarsh, Xha of mudflat and a high tide roost of X number of an SPA bird species; this needs to be identified to a certain level of confidence if sensible mitigation measures are to be proposed by the SMP2.	N Horns	11-Aug-09	The strategic nature of the study and the information available will be based on conservative determination of quantities wherever possible.	PT	16-Dec-09
26	3.3.12		We support this statement.	N Horns	11-Aug-09	Noted.	PT	16-Dec-09
27	3.4.2		4th Bullet Point: Assessment of impacts should include in-combination in addition to cumulative.	N Horns	11-Aug-09	Included.	PT	16-Dec-09
29	4.2		Suggest consideration is also give to existing coastal defense strategies.	N Horns	11-Aug-09	The SMP considers the existing SMP policy but will be the key driver for future policy.	PT	16-Dec-09
29	4.2.5		Question whether SMP policy should consider development allocation where development has not yet occurred.	N Horns	11-Aug-09	Agree, and removed text, as development for housing will not take place if there is an adverse effect on Natura 2000 Sites.	PT	16-Dec-09
30	4.3		Suggest consideration is also given to maintenance dredging baseline documents and port masterplans and similar where existing.	N Horns	11-Aug-09	That level of detail is in excess of the strategic approach to the HRA for SMPs.	PT	16-Dec-09
30	4.3.1		MFA is responsible for FEPA and CPA licences not CEFAS. In addition dredging may require Harbour Authority approval.	N Horns	11-Aug-09	Where relevant to the SMP study area.	PT	16-Dec-09
31	Table 5.1 Para 4		Advance the existing line - remove 'the Dorset Heaths SAC' and remove 'wet heath' and 'fens' from 'Habitats likely to be affected' <i>These habitats will not be affected by coastal squeeze</i>	S Burton	11-Aug-09	Edited.	PT	16-Dec-09
32	Table 5.1 Para 7 and 8		Managed Realignment - Remove 'or future' from 'or future anthropogenic constraints' <i>Cannot consider impacts of constraints that have no way of predicting will be there in assessment</i>	S Burton	11-Aug-09	Edited.	PT	16-Dec-09
33	Table 5.1 Para 9		No active intervention - <i>Need to be clear that effects on Avon Valley SPA and River Avon SAC would only be occurring where there are anthropogenic constraints otherwise it would be considered natural change</i>	S Burton	11-Aug-09	On consideration it is felt that NAI would not affect the two sites as natural processes would not prevent migration of tidal, estuarine and freshwater habitats, and any factors that would be outside the remit of the SMP.	PT	16-Dec-09
57	Appendix 2		It is unclear what the phase in many targets 'no obvious modification to structure features' means. Many of the targets in the table are an over simplification.	A Nicholson	11-Aug-09	This relates to the alteration of physical characteristics, and provides a target of preventing the alteration of the features physical surroundings (physical/chemical) to the extent that it would result in a significant deterioration or alteration to the features interests, outside of natural processes. Rather than an oversimplification, these are very wide ranging objectives and targets that are considered suitable at this strategic level, whilst still being able to clearly identify whether there is any likelihood of a deleterious change.	PT	16-Dec-09

Page No.	Paragraph	Line	Comment	Name	Date	RH Response	Name	Date
62	Under Potential Impacts Para 2		Replace 'in the loss of wet heath and other habitats' replace with 'coastal habitats'	S Burton	11-Aug-09	Edited.	PT	16-Dec-09
62	Under likely significant effect in combination		Replace 'adaption of habitats' with 'adaption of coastal habitats'	S Burton	11-Aug-09	Edited.	PT	16-Dec-09
63	Under Potential Impacts		Remove 'In the long term...other associated habitats' Coastal squeeze does not effect this SAC	S Burton	11-Aug-09	Edited.	PT	16-Dec-09
63	Under likely significant effect in combination		Remove all. Coastal squeeze does not effect this habitat	S Burton	11-Aug-09	Edited.	PT	16-Dec-09
64	Potential impacts		Remove 'In the long term....other associated habitats'	S Burton	11-Aug-09	Edited.	PT	16-Dec-09
71	Under potential impacts		Add 'New coastal defences could prevent cliff erosion and a source of sediment within Poole Harbour to maintain sandbank and mudflat areas'	S Burton	11-Aug-09	Added.	PT	16-Dec-09
72	Under Potential Impacts		Remove 'In the long term, coastal squeeze may occur due to constraining defences.....assocaited habitats' Coastal squeeze will not effect these habitats as they are not intertidal	S Burton	11-Aug-09	Edited.	PT	16-Dec-09
73	Under Potential Impacts		Remove 'In the long term, coastal squeeze may occur due to constraining defences.....assocaited habitats' Coastal squeeze will not effect these habitats as they are not intertidal	S Burton	11-Aug-09	Have reworded as there is a potential for dune habitats to be affected.	PT	16-Dec-09
73	Under likely significant effect in combination		Remove all reference to sea level rise as this is not applicable to this SAC	S Burton	11-Aug-09	Have reworded as there is a potential for dune habitats to be affected.	PT	16-Dec-09
71	Under Potential Impacts		Replace 'wet heath' with 'coastal habitats'	S Burton	11-Aug-09	Have reworded as there is a potential for direct footprint loss from coastal management measures.	PT	16-Dec-09

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General Comments:				Reviewer:		Organisation:	NFDC	
Given the lack of available data on habitat evolution, the approach taken seems sensible. It would be good to detail the adverse effect for each habitat – i.e. whether there is an adverse effect or not on saltmarsh, or reedbed etc etc.								
Page No.	Paragraph	Line	Comment	Name	Date	RH Response	Name	Date
12	2.3.3		"....further assessment would be provided when the actual scheme".....is undertaken.	NFDC	19-Jan-10	Edited.		
12	2.3.1		I think that this should be a reference to Appendix B rather than A.	NFDC	19-Jan-10	Edited.		
13	2.5.1		"...this is likely to relate to other plans or projects which may have effects on rather than of...."	NFDC	19-Jan-10	Edited.		
15	3.1.1		The reference to Section 1.5.1 is wrong- I think this should be 1.2.3?	NFDC	19-Jan-10	Edited.		
16	Fig 3.1		Difficult to see SPA and Ramsar boundaries on map.	NFDC	19-Jan-10	Maps recreated.		
17	Fig 3.2		Difficult to see SPA and Ramsar boundaries on map.	NFDC	19-Jan-10	Maps recreated.		
18	Fig 3.3		Can't see any designated site boundaries.	NFDC	19-Jan-10	Maps recreated.		
19	Fig 3.4		Can't see SAC site boundary.	NFDC	19-Jan-10	Maps recreated.		
32	3.5.6		Is there a reference for "reverse succession (upper saltmarsh being colonised by lower saltmarsh)"? Is this anything to do with SLR or salt pan development? Is there a reference for boat movements resulting in saltmarsh erosion?	NFDC	19-Jan-10	This data is from the Natural England website extracted from the SSSI condition tables. Reference added.		
33	Table 3.1		EA, second bullet point, should say <u>a range</u> rather than <u>arrange</u> and <u>sea level rise</u> rather than <u>seal level rise</u> .	NFDC	19-Jan-10	Corrected.		
40	5.3.1		"....undertaken for all PDZ's within the SMP area".	NFDC	19-Jan-10	Now 5.4.5 and corrected.		
41	5.3.2		Should read ".....is made more complicated by the uncertainties relating to how..." rather than, ".....is made more complicated by the fact that due to the uncertainties relating to how...".	NFDC	19-Jan-10	Now 5.6.2 and reworded.		
44	5.4.19		Would be good to have a summary of the qualifying features adversely affected..	NFDC	19-Jan-10	Included in Final Version Section 7.2.		
	Appendices		The appendices are in reverse order.	NFDC	19-Jan-10	Reorganised.		

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General Comments:				Reviewer:		Organisation:	Natural England	
<p>Comments relate to public consultation document HRA. I appreciate the uncertainties and difficulties in predicting habitat changes and the hard work that has obviously gone into attempting to do this through this exercise. Some parts of this document however are unclear as to how conclusions were made with respect to habitat change eg Table 6.1. Much work has been done to try to attempt to understand how Poole Harbour habitats have changed (saltmarsh and intertidal habitats) but the starting point of the unconstrained scenario although a useful exercise in understanding would seem to be unrealistic (eg that large parts of Poole would be removed and intertidal habitat recreated here) and a more appropriate comparison of the impact of the Shoreline Management Plan Review preferred policies would be the present management scenario. For example it would then be clear that the loss of saltmarsh without any managed realignment to the south of the Harbour and with the existing hold the line policy to the north would be much greater.</p> <p>While there are strings of tables relating to the workings out of the impact on Poole Harbour SPA and Ramsar there is very little information included explaining the workings out of the adverse effect on the Heathland SPA/SAC interests. I understand that this is due to the impact on Poole Harbour being very complex but there needs to have more clarification as to how the figures in Table 6.1 were reached with respect to the heathland losses and transitional habitats (is this referring to grazing marsh?) too.</p> <p>Table 6.1 is a critical table and needs expanding and clarification as to where this data has come from and a summary of the uncertainties. Realise that a lot more detail is given on workings out within appendices J onwards on this but this needs to be clearly referred to here and a summary of the key findings given.</p>								
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18	Fig 3.3 and 3.4		SPA boundary was not in the figure (at least not seen on printed out copy)	S Burton		Alternative figures created to provide clarity.	PT	13-Jan-10
26	3.2.24 and 3.2.25		refers to Poole Harbour conservation objectives should this not come after 3.2.29	S Burton		Correct, paragraph moved.	PT	13-Jan-10
39	PBH.J.4		Subject to legal requirements - needs to be more positive (Legal agreements need to be investigated)	S Burton		This was an area of much debate within the CSG. It is more positive in the main SMP text.	GG	13-Jan-10
42	5.2.15		? Is drainage management a coastal defence or land stabilisation issue? If former wouldn't this be outside of the scope of the SMP?	S Burton		Strictly speaking it is a land drainage issue although it is affected by coastal erosion in that the slope would eventually stabilise if there were no erosion pressure. The SMP sets policy solely for flood and coastal erosion risk management, but is also meant to comment on and, where relevant, discuss issues that go beyond this. In this specific area one of the key issues is land drainage, the SMP would not be fulfilling its overall function without considering this.	GG	13-Jan-10
			Unconstrained scenario (do nothing) - does this mean taking away existing defence or just letting existing defences fall apart - would have been more useful to taken present management as baseline but not sure how complicated this would be.	S Burton		The use of unconstrained has been changed throughout the HRA to NAI, as that is what it refers to. Within the SMP there are only 4 scenarios to consider, NAI, MR, HTL and ATL.	PT	13-Jan-10
44	5.3.6	16	need a figure for where WeBS sectors are in appendix	S Burton		Inserted figure into Section 5 of the HRA showing WeBS count sectors.	PT	13-Jan-10
89	Table 6.1		<i>Unclear where the measurements for compensatory habitat have come from. Heathlands - related to loss at Heng Head and managed realignment policies in Poole Harbour? What are the transitional habitats - are they the grazing marsh that likely to be lost under MR scenario? Saltmarsh habitat loss is this assuming managed realignment has recreated new habitat. This table is a key one that folk will look at and needs to be expanded/refer to other sections of the appendix so that clear where measurements have come from and possible uncertainties. The spring tide intertidal habitat loss is a huge figure - is this mainly linked to loss of mudflat and an assumption that the MR policies will result in saltmarsh recreation rather than mudflat habitat recreation? I realise that a lot more detail is given on workings out within appendices J onwards on this but this needs to be clearly referred to here and a summary of the key findings given.</i>	S Burton		Revisions made through Section 5, 6, and 7 as well as appendices to provide more clarity and transparency of decisions/assessment. Appendix M and N identify the Dorset Heathlands losses. Transitional habitats are those between the MWHS and HAT zone. The saltmarsh habitat loss is based on the implementation of the preferred policies. The uncertainties are identified in Appendices as well as in main text in Section 5, 6, and 7. Heathland affects linked to habitat area, aerial photos, and GIS mapping.	PT	13-Jan-10
						Pessimistically we did base the habitat compensation requirement on the future unconstrained compared to the future preferred policies. We have focussed this on the Sites habitat areas rather than the PH as a whole. Have provided additional text within Section 6 and Section 7, and revised Table 7.1.		
88	6.1.7	6	<i>Should refer to Table 6.1 not table 5.2.4</i>	S Burton		Correct reference edited.	PT	13-Jan-10
	Appendix J onwards		<i>Need to go through and check whether No/Yes conclusion on integrity is correct - appears to be the wrong way around in some places</i>	S Burton		Reviewed and corrected.	PT	13-Jan-10

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General Comments:				Reviewer:		Organisation:	Natural England	
Comments received during public consultation exhibitions.								
Page	Paragraph	Line	Comment	Name	Date	RH Response	Name	Date
	Fig 3.1		Missing SSSI and possibly SPA / Ramsar.	Natural England		Figure recreated, but maps only showing international sites, not SSSIs.	PT	22-Feb-10
	Fig 3.3		Missing Poole Harbour SPA / Ramsar site and SSSI.	Natural England		Figure recreated, but maps only showing international sites, not SSSIs.	PT	22-Feb-10
	Fig 3.4		Missing SSSI's.	Natural England		Figures only showing international sites, not SSSIs.	PT	22-Feb-10
	Fig 3.5		SPA in figure should include Sturt Pond and reed bed.	Natural England		Revised figure shows SPA over part of Sturt Pond, based on NE digital data set.	PT	22-Feb-10
	Fig 3.6		SAC Boundary wrong, should include Sturt Pond.	Natural England		Revised figure shows SAC over part of Sturt Pond, based on NE digital data set.	PT	22-Feb-10
	3.2.5		Bird species listed wrong - looks like those for Poole Harbour, no shelduck or avocet in the Solent.	Natural England		Corrected.	PT	22-Feb-10
	3.5.6		It should be noted that the units identified as unfavourable due to coastal squeeze in Solent SAC and SPA are likely to be remedied before the end of the financial year through the regional habitat creation programme.	Natural England		Noted.	PT	22-Feb-10
	4.2		Should also be minded of the new draft coastal change policy which is likely to be supplement to PPS 25, and is currently out to consultation.	Natural England		Noted.	PT	22-Feb-10
	Table 5.1		Missing policy units between Hordle Cliff and Mudeford e.g. Barton-on-Sea, Highcliffe etc.	Natural England		These are policy units that would not have an adverse effect due to the distances and limited effect on physical processes at the sites. However, all units now included to avoid confusion.	PT	22-Feb-10
	5.2.6		Missing rest of PDZ1, only makes reference to Hurst Spit.	Natural England		This descriptive paragraph only includes the description of the processes and area relevant to the Natura 2000 sites of the Solent SPA, SAC and Ramsar.	PT	22-Feb-10

Page No.	Paragraph	Line	Comment	Name	Date	RH Response	Name	Date
Document Title:			Draft AA Report	Project No.:	9T2052	To be returned to:	T Eggiman	
General Comments:				Reviewer:	R Henderso	Organisation:	RSPB	
Page	Paragraph	Line	Comment	Name	Date	RH Response	Name	Date
	Table 6.1		We are not clear as to how exactly the estimates within Table 6.1 have been calculated, and would be grateful for the opportunity to discuss these and the stages undertaken to arrive at the figures. We imagine the information is present within the SMP but we have had difficulty in piecing together the 'pathway' by which the estimates have been	R Henderso	10-Feb-10	Revisions made through Section 5, 6, and 7 as well as appendices to provide more clarity and transparency of decisions/assessment.	PT	22-Feb-10
	6.1.9		We were pleased to note and strongly support the comments made in paragraph 6.1.9 regarding monitoring, and ensuring a positive balance of Natura 2000 habitats.	R Henderso	10-Feb-10	Noted.	PT	22-Feb-10
	6.1.11 & 6.1.12		We also support the comments made in paragraphs 6.1.11 and 6.1.12 regarding compensation being tied to interest features rather than simply extent and the requirement for specific initiatives for locations such as Brownsea Lagoon and The Moors, locations of particular concern to the RSPB.	R Henderso	10-Feb-10	Noted.	PT	22-Feb-10
	Hurst Spit		Implications for the terrestrial habitats protected by the Spit are not fully considered within the SMP, being deferred to the adjacent North Solent SMP. We consider the absence of this analysis an omission given the direct links to management at Hurst Spit and this should be presented within this SMP.	R Henderso	10-Feb-10	The implication of the loss of the Spit on terrestrial habitats was not clarified, mainly due to the fact that the effects on the coastal habitats would be extreme, and would thus exacerbate any affects of sea level rise, erosion, and therefore increased loss of terrestrial habitats such as coastal grazing marsh, reedbed, etc.	PT	22-Feb-10
	Brownsea Lagoon		We support the preferred policy for Brownsea lagoon.	R Henderso	10-Feb-10	Policy has now changed to NAI.	PT	22-Feb-10
	Northern Poole Harbour		No information is presented in the SMP on the likely spatial consequences of sea level rise.	R Henderso	10-Feb-10	Figures 5.1 to 5.6 in the draft presented the locations of spatial changes in habitats through PDZ 3, and the detailed assessment tables identified at a policy unit (WeBS low count sector) level where habitats were affected. Further figures have been included within the final HRA.	PT	22-Feb-10

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Document Title:			Revised Draft AA Report	Project No.:	9T2052	To be returned to:	T Eggiman	
General Comments:				Reviewer:		Organisation:	Natural England	
For PDZ1, PDZ2 and PDZ 3								
Page No.	Paragraph	Line	Comment	Name	Date	RH Response	Name	Date
	5.3.4		Needs some separation to show now dealing with just Poole Harbour Entitle 'Impacts of the changes within Poole Harbour on SPA and SAC features'?	S Burton	31-Mar-10	Have included sub-heading for clarity.	PT	6-Apr-10
	5.2.10 5.2.11		Change arne peninsula to poole harbour south	S Burton	31-Mar-10	Included wording of Poole Harbour South to link with count sectors and descriptive sections.	PT	6-Apr-10
	figs 5.8- 5.10		Why arne bay 5.8 has no intertidal	S Burton	31-Mar-10	The topo data indicates that this is mainly subtidal and hence it hasn't shown up. This may not be accurate (given the strategic nature of the work undertaken), and could therefore mean the extent of intertidal habitat would be greater in 1993 and 2009 data extractions. However, given that this area is an undefended coastline and NAI remains the policy, it will have no material effect on the quantities of adverse effects or compensatory requirements of the SMP.	PT	6-Apr-10
108	5.5.8		Refers to Table 5.19 showing habitat extent changes but seems to be a missing table? As Table 5.19 shows tide levels used	S Burton	31-Mar-10	The extent changes are in Tables 5.14 to 5.18 the reference to 5.19 is regarding the tide levels used in the measurements.	PT	6-Apr-10
	For table 5.22		Poole Harbour SPA should say 'maybe' rather than 'would be' offset because it is not a certainty rather than saltmarsh or mudflat MR may result in reedbed here	S Burton	31-Mar-10	Changed to could.	PT	6-Apr-10
			Poole Harbour SPA 2 should change to 'a significant loss of extreme high intertidal...' Also what habitat is this – is it reedbed?	S Burton	31-Mar-10	Edited. It is all upper intertidal mudflat, given the locations of the constraints areas (NE1 and NE3), and this would be more than offset by the overall increase in higher intertidal habitat across the SPA as a whole.	PT	6-Apr-10
			Dorset Heath SPA Cladium is not an SPA habitat so should be removed	S Burton	31-Mar-10	Deleted.	PT	6-Apr-10
			Dorset Heath SAC Rhyncosporion should be added as it coincides with where cladium is found and could similarly be protected	S Burton	31-Mar-10	The mitigation measure that provides the protection to Cladium would therefore coincide with protecting Rhyncosporion. Added in 'Rhyncosporion'.	PT	6-Apr-10
	5.7.10	2	line 2 complete erosion of heng head I believe is in the case of the unconstrained (remove all dfences scenario) - much erosion but don't recall complete erosion being the prediction for present management	S Burton	31-Mar-10	WPM erosion is shown in Fig 4.3.7 in Section 4 PDZ 2 Report. No encorachment within the designated sites at Hengistbury Head.	PT	6-Apr-10
	5.7.17		<i>mentions loss due to current wareham tidal banks but MR policy here?</i>	S Burton	31-Mar-10	This sentence is identifying that the Banks are currently defended and it is that intention of defence that prevents adaptation. However, yes, the policy here is to MR the banks and hence provide the adaptation of intertidal habitats that would offset that lost due to coastal squeeze.	PT	6-Apr-10
	6.2.1		<i>Mitigation measures need o be a bit clearer as to what they refer to</i>	S Burton	31-Mar-10	Have edited points 5, 6, and 9 to provide clarity. Remaining points are considered to provide sufficient descriptive information of any specific locations.	PT	6-Apr-10
	7.2.1		<i>Solent & SHW SPA & Solent Maritime JSAC missing?</i>	S Burton	31-Mar-10	Added summary in.	PT	6-Apr-10
	7.4.2		<i>Remove 'required' would not advocate HTL at this site just in order to minimise adverse effect of habitat loss</i>	S Burton	31-Mar-10	Have slightly reworded to remove 'required' and put less onus on this position as solely for protection of habitats, though it is the case that its disruption would result in severe adverse impacts to the SAC and SPA habitats, and would be better (under Article 6(2)) to protect this shingle ridge than to allow it to deteriorate with subsequent effect.	PT	6-Apr-10
	7.5.1	last line	<i>Remove 'easily' (if only!)</i>	S Burton	31-Mar-10	Really, was trying to say that it is straightforward to re-create, rather than easy, but just deleted easy anyway.	PT	6-Apr-10

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			As discussed during our telephone conversation yesterday a summary of the option appraisal of how these policy options have been reached with the SPA and SAC interest in mind should be given at the end of the document to help improve the clarity of the document and serve as an audit trail of how these policies were reached. This would most clearly be achieved by referring to the Figure depicting the preferred options for each epoch.	S Burton	31-Mar-10	Added additional summary text in Section 7.1 and also added summary policy figures at the beginning of Section 5, now Figures 5.1 and 5.2.	PT	6-Apr-10
			Supporting text for poole harbour for example could be 'for Poole Harbour SPA wherever possible the NAI or MR policy has been used to prevent coastal squeeze of intertidal habitats and recreate these habitats. MR/NAI is the preferred policy therefore in the southern undeveloped parts of the Harbour. However in the northern more urbanised parts of the Harbour HTL is the preferred policy in the main in order to protect residential, commercial interest and infrastructure such as railways. Even here where possible NAI and MR have been used eg Holes Bay, Lytchett Bay' Grazing Marsh within the SPA will be lost as a result of MR policies but this is unavoidable if intertidal habitats are to be recreated.etc'	S Burton	31-Mar-10	Added additional summary text in Section 7.1.	PT	6-Apr-10
			Table 5.22 is a key table summarising an estimate of the habitat areas of SPA/SAC interest that will be lost while 6.10 is a key table of where the predicted compensatory requirements will come from. These tables need to stand out and as discussed a better explanation would be given here if Figures were used showing the location of losses of heathland, grazing marsh etc.	S Burton	31-Mar-10	Have added additional text in Table 5.22, which also includes reference to Table 5.20 which lists specific locations and habitat types lost, and refers to figures 5.17 to 5.27. Also included additional figures 5.28 and 5.29 which show grazing marsh areas that could be lost as a result of MR (and compensatory habitat).	PT	6-Apr-10
			As you are aware we have concerns as to how the lagoon will be effected by predicted sea level rise and although a no active intervention policy would not trigger a need for compensation it needs to be clear that 'appropriate steps' need to be taken to ensure that the function that the Lagoon serves to the bird interest of the SPA continues to exist. A paragraph is needed at the end of the HRA highlighting this.	S Burton	31-Mar-10	Paragraph added in Section 6.3 based on the recommended statement, which has been expanded somewhat.	PT	6-Apr-10