

Severn Estuary Strategy Consultation Response Summary

1.0 General Comments

Code	Comment Received	Response	Addressed? Page ref
G1	Catchment based approaches have been adopted to tackle water-related issues on a wider scale. Estuaries are the lower reaches of one or more rivers where freshwater meets coastal environments and therefore adopting a catchment based approach will be beneficial into the Severn Estuary Strategy. The new strategy needs to recognise upstream plans and strategies to avoid overlaps, enhance communication and promote good governance practice amongst wider partners and partnerships.	Agree. See P1.	See P1
G2	The Bristol Avon Catchment Partnership is keen to work with the Severn Estuary Partnership in the future to align priorities and deliver joined-up projects that improve the many beaches, the estuarine environment and coastal waters along the Severn Estuary coastline as a part of our current strategy published in our Bristol Avon Catchment Plan available on our website that can be found at http://www.bristolavoncatchment.co.uk/ The West of England Nature Partnership has identified the Severnside Wetlands Nature Improvement Area (NIA); which includes part of the Severn Estuary and the land running adjacent to it. There are many opportunities to work joined-up with upstream partnerships. We are happy to provide further information about the current projects that are taking place in the Severn Estuary area. Please feel free contact us at info@bristolavoncatchment.co.uk .	We welcome and look forward to working with the Bristol Avon Catchment Partnership in the future.	See P1
G3	It would be interesting to have a brief description of what the Severn Estuary Partnership would like to achieve during the period 2016-2026. Moreover, the environment should be promoted as strength of the Estuary for its special designations more than a limit which shows to more a negative picture of the environment.	This will be addressed within the SEP Strategic Business Plan, which will be published Spring 2017.	Noted, but no action
G4	Overall, the outcomes answer to the objectives.	Noted.	Noted, but no action
G5	Further detail is needed to bring this high level aspirational statements into fruition. Perhaps this will be in the Business Plan?	The Actions outlined in the Strategy will be incorporated into the SEP Strategic Business Plan for the period 2017-2022.	Noted, but no action

G6	Severn Estuary does NOT have the 2nd highest tidal range in the world; I read reference to it 3 times.	Amend text to read: one of the highest tidal ranges in the world.	Page 8 & 11
G7	Will the Business Plan indicate what is meant by 'membership'? Is the paying scheme still running - cant see details on website.	This will be addressed in the revised SEP Strategic Business Plan (2017-2022).	Noted, but no action
G8	Will the Business Plan aspire SEP to formalise its voluntary status further by establishing a Charity/Company?	This will be addressed in the revised Business Plan during 2017/18, or through the JAC/SEP Management Group discussions.	Noted, but no action
G9	Is SEP aspiring for more statutory influence through LSI in MSP? Draft Strategy is good as a high level starting point	This will be discussed at the next JAC/SEP Management Group.	Noted, but no action
G10	We would ask that the Catchment Partnerships established in the region are more fully engaged with by the Severn Estuary Partnership (e.g. as part of Objective 4.1). Wessex Water hosts the Bristol Avon Catchment Partnership, and it would be beneficial if the recently published Bristol Avon Catchment Plan is included in the evidence base for your consideration as this will influence water quality in the Severn Estuary	We welcome and look forward to engagement from Catchment Partnerships in the future. Addition of Action 4.1.5: Promote good practice on a catchment scale by developing links with existing Catchment-based Partnerships.	Action 4.1.5 Page 13
G11	We welcome the inclusion of water quality issues within the scope of the Strategy. I would note that Wessex Water will be investing in significant works to tackle issues identified in the River Basin Management Plans in order to achieve Water Framework Directive Standards. Wessex Water is undertaking in AMP6 (2015 – 2020) or has completed in AMP5 (2010-2015) several projects to improve bathing water or water quality in the Estuary area (or to increase our knowledge of how our assets impact these elements), but in summary: <ul style="list-style-type: none"> We are investing about £38m to improve the Burnham Jetty bathing water. This involves: the upgrade of Cannington and Combwich STWs with ultraviolet (UV) disinfection processes; increasing the storm storage capacity of CSOs in Bridgwater to reduce the number of spills into the rivers at times of high rainfall; improvements at Dunball STW and trials of a disinfection process at Highbridge storm tanks. We will also be investigating whether waste water discharges in the Taunton area affect the bathing water quality at Burnham. We completed a £26m improvement scheme at Weston-super-Mare STW in April 2013 which improved the treatment capabilities at the works (including the UV disinfection) and provided 21,000m3 of storm water storage to reduce the likelihood of spillage into the bathing waters and provide a better disinfected effluent. 	We welcome engagement from Wessex Water with the Partnership and encourage them to regularly promote such work through SEP communications.	Noted, but no action

	<ul style="list-style-type: none"> We are currently investigating the effectiveness of our lagoons at Wick St Lawrence STW and whether final effluent from the site affects the quality of the bathing water at Sand Bay or Clevedon and if alternative, improved treatment might be needed. During AMP6, we will be trialling the catchment permitting approach in the Bristol Avon catchment. Works will target phosphorus removal in the catchment, achieved by optimising existing treatment processes at 13 STWs and installing new phosphorus removal treatment processes at a further 11 STWs. We are happy to provide any further information on the above projects or please refer to our website (https://www.wessexwater.co.uk/About-us/Environment/Environmental-investigations/) which includes downloadable summaries of these works. 		
G12	The initial Severn Estuary Strategy is some 15 years old now so the revision, in light of Brexit, the provisions of the Marine & Coastal Access Act 2009 requiring an ecosystem-based approach to the management of the sea and coast as well as the start of Marine Planning in the South West, is timely and appropriate	Many thanks for supportive comments.	Noted, but no action
G13	The Severn Estuary Strategy provides a strong framework to support integrated and consultative management of such a complex and diverse area. The 'principles' approach of the strategy is supported. We also favour the more concise approach.	Many thanks for supportive comments.	Noted, but no action
G14	The strategy doesn't say that much about the WoE Joint Strategic Planning, the Joint Transport Strategy, the proposals for the new nuclear reactor at Oldbury (Horizon) or the potential for large scale renewables in the area, all of which are likely to have or have the potential to have impacts on this area. Whilst I recognise its impossible to address everything in the strategy itself, I would encourage you to make reference them in the response so there are brought to their attention	It is beyond the scope of the Strategy to mention all strategies/plans and proposals. With regard to nuclear, this is included in Para 2, Page 6: Ports, aggregates, chemical processing companies and power stations, as well as many others, all play a vital role in the economy and social structure of the area.	Noted, but no action
G15	I am surprised that given the presence of nuclear power stations, being decommissioned, generating and 2 proposed nuclear new build power stations (one under construction), that the context does not specifically mention nuclear power stations	See G14.	Noted, but no action
G16	It appears that the document cannot decide whether it has 5 principles or 5 themes. We think the use of the word Theme is confusing – these sections could equally be called "Principle 1 – Achieving a sustainable marine economy" and etc.	The titles of pages 6, 8, 10 and 12 have been amended to read "Principle", instead of theme.	Pages 6, 8, 10, 12 and 14
G17	Objectives should be Specific, Measurable, Assignable, Realistic and Time Related. At this stage, we don't see many of these features yet amongst the declared objectives. Perhaps they exist at a sub level to these "headline" objectives. We are not sure that the order is	The Actions outlined in the Strategy document will be incorporated within the SEP Strategic Business Plan and will be SMART.	Noted, but no action

	correct. Actions should support objectives which should deliver outcomes that support the principles.		
G18	Page 5 suggests that the actions should be SMART but at this level they do not achieve this. What is actually going to happen – and by when – and who is accountable for that delivery? The wording seems imprecise e.g. “Explore the indicators of measuring trends of well being....”	The Actions outlined in the Strategy document will be incorporated within the SEP Strategic Business Plan and will be SMART.	Noted, but no action
G19	There is nothing stated about coastal realignment and managed retreat – a long abandoned strategy. Restatement that this is NOT being considered would be helpful	This is considered beyond the remit of the Severn Estuary Strategy. The Severn Estuary Coastal Group covers these topics.	Noted, but no action
G20	<p>The Welsh Government (WG) and MMO have a wide range of responsibilities and functions in the Severn Estuary. We recognise the importance of collaboration and integration in cross-border areas and welcome the strategy as a helpful and focussed mechanism to support engagement and collaboration. WG and MMO have jointly considered the draft SES in providing this response to the Severn Estuary Partnership (SEP).</p> <p>As the marine planning authority, the WG and MMO are developing the Welsh National Marine Plan and South-west marine plan which will set out Government’s policy for the Welsh and SW marine areas. WG and MMO have recently worked with the SEP to deliver a cross-border workshop exploring common issues and approaches to help inform the development of marine plans. The workshop demonstrates the practical value of SEP to support joint working and we are pleased to see that the SES builds on this theme.</p> <p>This is a worthy strategy that tries to tie in as much public participation in the process as possible. Putting coastal communities at the heart of marine spatial planning is vital. It is helpful that the SES follows the five HLMOs, which should make it easier for people to follow alongside statutory requirements in the MPS. Adopting this framework will also support the work of WG and the MMO to promote cross-border marine planning compatibility and integration. Overall, we welcome the new strategy and the focus on engagement and collaboration.</p>	<p>Many thanks for supportive comments of the practical value of the Strategy for both the WG and the MMO. We look forward to engaging with you throughout the marine planning process.</p>	Noted, but no action
G21	One question not related specifically to the document itself but a more general governance consideration. There are several mentions of the ‘Well-Being of Future Generations (Wales) Act 2015’. The MMO recognises the statutory duty this Act places on Welsh public bodies and, while the Act has no statutory power in English planning regions, we are keen to	Action 2.2.2 amended to: Explore and propose indicators to better encourage the measuring of well-being indicators, ensuring new	Action 2.2.2 Page 9

	support the aim to promote health and well-being of communities in Wales where possible. In return it would be useful to clarify how the SES will be implemented in accordance with the Act while ensuring no adverse impacts on English waters and coast	approaches are shared and discussed across the estuary.	
G22	<ul style="list-style-type: none"> Commercial Fishing – Add to Themes 1, 2 and 3 Seascape – Recommend expanding throughout SES and perhaps adding as an objective in its own right Cultural Heritage - can be split between Themes 2 and 3 Ecosystem Services – This could do with beefing up in Theme 3 	<p>There is relatively little commercial fishing ongoing within the Severn Estuary and it is impossible for the Strategy to reference every type of industry. Added to Principle 3: Is supports commercial fisheries, as well as....</p> <p>Seascape and cultural heritage – Agree, see E9.</p> <p>ES – text amended to: The Severn Estuary is a huge, diverse area with fascinating natural, cultural, geographical and geological features that support many ecosystem services.</p>	<p>Page 10 Para 1</p> <p>See E9</p> <p>Page 10 Para 1</p>
G23	The Severn Estuary Partnership’s role as a facilitator for collaboration across the Estuary and across sectors with an interest in the Estuary is an important one. Therefore a revised Severn Estuary Strategy will have a role to promote a broader understanding of the Estuary and a more integrated and sustainable approach. In this context, the Strategy would have value as a guiding and influencing document to support the role of SEP as a hub organisation, communication channel, facilitator of debate and consultation on key issues, a partnership facilitator and potentially a support for those that wish to engage with stakeholders and communities in and around the Estuary. With this in mind, I congratulate the effort to prepare a short document as a huge step towards making it a more accessible agenda. I would encourage further consideration of how to make such a document accessible to members of the public, especially given the SEP’s important role in bringing people together to discuss a sustainable future for the Severn.	Many thanks for supportive comments.	Noted, but no action
G24	As an Estuary stakeholder, based on the draft Strategy content, areas of interest and potential collaboration across the objectives may include:	Many thanks for supportive comments.	Noted, but no action

	<ul style="list-style-type: none"> Stakeholder and community engagement across the Estuary – transboundary issues, statutory and non-statutory partners (e.g. ASERA), community involvement, platform for debate and discussion; Education and research opportunities – promote the understanding of climate change, adaptation and mitigation measures, coastal defence, flood risk, coastal erosion, archaeology, water quality / pollutants; Partnership building - Citizen Science scheme and environmental stewardship opportunities; CSR development – promotion of sustainable development / community footprint scheme. 		
G25	<p>Although there is reference to a vision in the draft Strategy, it is not included, and it is difficult to comment on the draft Strategy without having a vision that provides direction and context for the principles, objectives, outcomes and actions, and makes them relevant to this geographic area and to the intended period of the Strategy. There is contextual commentary for each theme, but the Strategy need a SEP vision that overarches these themes and provides a consolidated picture/aspiration/direction for the Estuary in 10 years' time (and beyond).</p>	The Vision is outlined on Page 5 of the Strategy.	Noted, but no action
G26	<p>A strategic issue that is not absent, but arguably is subdued in this draft Strategy is climate change. There are challenges and opportunities that arise from a changing climate; there is an urgent need to support mitigation through significant lowering of emissions (enabled by a transition to a low carbon economy - which may bring a new prosperity to the Estuary); the need to adapt to climate impacts including sea level rise (an opportunity for investment in new wetlands and areas for conservation for instance); and the need to consider resilience of people, nature and businesses (an opportunity to bring people together for a common strategic cause). The Estuary is changing because of climate change, vulnerability to climate change is increasing (for people, communities, biodiversity, habitats, infrastructure etc). Could the draft Strategy provide a valuable baseline understanding of the present situation and likely future impacts by way of important context, and promote a common understanding? Rather than being within a theme, climate change is a cross cutting issue across each of the themes in the draft Strategy (note climate change is defined as a cross cutting issue by the National Infrastructure Committee in the work they are undertaking on the National Infrastructure Assessment; it is also a cross cutting issue embedded in each of the Wales Wellbeing Goals). Perhaps the timing of this draft Strategy is an opportunity to</p>	<p>Text amended to: This Strategy will also provide context to inform and support decision-making for a wide range of proposed estuary developments, including those related to maritime uses, minerals and marine renewable energy, alongside other drivers such as climate change.</p>	Page 4

	inform and educate on climate change, promote a common understanding, focus research, facilitate debate, encourage collaboration and focus on potential solutions to put the Estuary on course for a more resilient (and sustainable) future?		
G27	Although there are significant challenges relating to the uncertainties arising from BREXIT and economic resilience around the Severn, I earlier referred to this being a challenging time for SEP to be undertaking a review of the Strategy because of the way that the strategic policy context is rapidly evolving. On the Welsh side, as you have identified, the Wellbeing of Future Generations (Wales) Act is redefining sustainable development in Wales and how public bodies will pull together to achieve Wellbeing Goals. Also, the Environment (Wales) Act shifts Wales towards natural resource management to achieve Wellbeing Goals, including a duty on biodiversity, an ecosystems and adaptive approach, with Area Statement coming soon. In some respects natural resource management is mirrored by the emerging Natural Capital agenda in England. Because of the complicated and evolving policy picture, perhaps there is a need to consider how the final Strategy is able to be resilient (and maintain relevance) in this changing policy environment? Common to both sides of the Estuary is marine planning, as you've identified, and the unarguable principles set in the Marine Policy Statement are perhaps a good way of asserting relevance in the Strategy, in which case the test is whether these principles also work for coastal communities (e.g. is 'sustainable marine economy' broad enough for Estuary interests?).	The Strategy makes the following statement on Page 4: "....this Strategy document will help ensure a more integrated approach for the Severn Estuary, particularly at a time of uncertainty in European governance." Footnote on Page 10 outlines: *The Strategy will be revised in light of significant government or legislative changes, where necessary. Addition of Action 4.1.4: Promote information on and engage with the Brexit debate and its implications for the estuary.	Page 4 Page 10 Footnote Page 13 Action 4.1.4
G28	Although there is a focus on marine planning in the draft, there does not seem to be much reference to the emerging city region and devolution agendas, including the Cardiff Capital Region and the City Deal, Great Western Cities, and West of England devolution. Is there an opportunity for the Strategy to be a reference point for making coastal and marine areas of the Severn Estuary relevant and important to the sustainable development of what could be described at the Great Western Cities and their hinterlands? Could this help focus investment on Estuary priorities (e.g. climate change adaptation, accessibility, green growth business support, biodiversity initiatives etc)?	Text amended to: City regions and devolution agendas are emerging like <u>Great Western Cities</u> , which, launched in 2015, involves Newport, Cardiff and Bristol. The <u>Cardiff Capital Region</u> is a partnership of 10 local authorities in south Wales, with an investment of £1.2billion from 2016-2023, whose vision is to secure sustainable economic growth for future generations.	Page 6 Para 3
G29	I'm always interested in knowing what I'm looking at and I feel that the use of photographs in such a document should not be seen as just adding a bit of colour, they can also add a little information – so seeing untitled shots of ships, docks, landscapes/seascapes etc I think misses a trick. I appreciate that adding titles means juggling the layout, but I think it would add something, albeit comparatively small.	Agree. Captions/information have been added to support pictures where appropriate.	Throughout the Strategy where relevant

G30	Check use of lower case 'e' for estuary throughout: in some cases it should be upper case.	Agree – this has been checked and revised where appropriate.	Throughout the strategy where relevant
G31	<i>(RE Q5 additional actions?)</i> Potentially - need more detail to see whether these aspirational actions can make a difference	The Actions outlined in the Strategy document will be incorporated within the SEP Strategic Business Plan The Actions will be SMART and monitored on an annual basis.	Noted, but no action
G32	I could not see a Habitat Regulations Assessment (HRA) for the Strategy with the consultation documents. One might not be required (it is not if a plan or project is related to the management of the European Site) but it would be best to check with NRW or NE. Whilst the Partners will be familiar with the various national and international designations covering the Severn Estuary, members of the public may not be (other than a general 'awareness').	A Habitat Regulations Assessment (HRA) for the Strategy has been produced and will be available online with publication of the final document.	Noted, but no action
G33	<p>As you know, The Welsh Ministers have a wide range of responsibilities and functions in and relating to the Severn Estuary. We recognise the importance of collaboration and integration in cross-border areas and welcome the strategy as a helpful and focussed mechanism to support engagement and collaboration. WG and MMO have jointly considered the draft strategy in providing our response to the SEP (this response is copied to the MMO).</p> <p>As the Welsh marine planning authority, WG are developing the Welsh National Marine Plan which will set out Governments policy for the Welsh marine area. WG and MMO have recently worked with the SEP to deliver a cross-border workshop exploring common issues and approaches to help inform the development of marine plans. The workshop demonstrates the practical value of SEP to support joint working and we are pleased to see that the SES builds on this theme.</p> <p>It is helpful that the SES applies the five HLMOs, which should make it easier for people to follow the strategy alongside statutory requirements in the MPS and related marine plans. Adopting this common framework will also support the work of Welsh Government and the MMO to promote cross-border marine planning compatibility and integration. Overall, we welcome the new strategy and the focus on engagement and collaboration.</p>	Many thanks for supportive comments of the practical value of the Strategy for both the WG and the MMO. We look forward to engaging with you throughout the marine planning process.	Noted, but no action

2.0 Introduction

Code	Comment Received	Response	Addressed? Page ref
I1	It would be helpful if the introduction could provide some spatial context to the estuary acknowledging that the strategy is not constrained the extent of the estuary but more factors and activities that influence the estuary	Agree, a footnote amended to read: *in order to focus on specific topics/issues the Strategy area may broaden to cover factors/activities that influence the estuary, where appropriate.	Page 4
I2	I was under the impression that the 'estuary' designation extends to Hurlstone Point? A check needs to be made to ensure that designations used are the ones accepted and used elsewhere.. eg. if I recall correctly there was much contention about the designations and boundaries that were part of the EU Waste Water Directive, which ended by being decided in the High Court. ie those are the ones that should therefore be employed here.	The area covered by this Strategy (see map page 16) extends from just above Gloucester to Hurlstone Point near Minehead on the English coast and Nash Point on the Welsh coast. However, in order to focus on specific topics/issues the Strategy area may broaden to cover factors/activities that influence the estuary, where appropriate.	Noted, but no action
I3	In the 'Actions' row, the acronym SMART is missing a word for the 'R' (which we suggest is 'Relevant').	Text amended to include 'Relevant'.	Page 5
I4	Page 4 – typo : 'Hurlstone Point' (capital P).	Typo amended.	Page 4

3.0 Theme 1 – Achieving a Sustainable Marine Economy

Code	Comment Received	Response	Addressed? Page ref
A1	The Theme does not specifically refer to the Enterprise Areas rather to the three LEPs on the English side. The Severnside-Avonmouth Enterprise Area covers the coastal floodplain between the River Avon and Severn Beach and is one of the main economic drivers for the South West Region. As the waterbirds for which the Severn Estuary is designated an SPA use wetlands in the floodplain as high tide roosts, development within it can have a direct impact on the European Site. It is not a 'marine' economy as such – rather a terrestrial one and this needs to be recognised in the Theme.	Agree. Text amended to: Enterprise Areas, such as the Severnside-Avonmouth and Bristol Temple Quarter Enterprise Zone, are key economic drivers for the South West region.	Page 6 Para 3
A2	The Council is working hard to reconcile on-going economic growth with the conservation objectives of the Severn Estuary SPA/Ramsar and in helping free up the full potential of the	Text amended to:	Page 7

	EA we expect the business community to recognise and respect the needs of the European Site. There is a statutory process (Habitat Regulations Assessment) involved which is not reflected in Objectives 1.1 and 1.2 and which implies an almost voluntary approach – backing and supporting businesses which ‘respect environmental limits’. In other words, the internationally important wildlife of the Estuary seems to be subordinate in the first economic theme to development. It seems vague and not firmly worded.	To embed and promote the principles of sustainable development as part of efforts to create and maintain a diverse, thriving and competitive economy, whilst respecting environmental limits.	Outcome 1.1
A3	This first para needs to be more inclusive and reference smaller employment areas that do not have “excellent land & sea communications”. Improving transport infrastructure between coast to town to the wider motorway network is a key issue for smaller towns and at present a barrier to economic growth.	It is not within the scope of the Strategy to improve transport infrastructure.	Noted, but no action
A4	Third para – It would be helpful to mention the LEP’s own Strategic Economic Plans here and the importance of linking the Severn Estuary Strategy to the LEP’s strategic planning work. For the foreseeable future, the Government will continue to channel Growth Funds to the LEP’s and this could present an opportunity for those LEP’s not already looking to enhance the economic potential of their coastal areas.	Agree. Text amended to: There are three Local Enterprise Partnerships (LEPS) on the English side of the estuary, GFirst (Gloucestershire), West of England and Heart of the South West (click for Strategic Economic Plans).	Added links to Strategic Economic Plans Page 6 Para 3
A5	P7 - text refers to 'community footprint' but doesn't offer any explanation of the term.	The term “community footprint” under Action 1.2.3 has been hyperlinked to access: http://www.bitc.org.uk/resources/community-footprint	Page 7 Action 1.2.3
A6	Theme1 – Achieving a Sustainable Marine Economy. No mention of commercial fishing. We feel commercial fishermen are a vital link in the ecosystem of the Severn Estuary and would seek for their inclusion in Theme 1. In marine planning terms commercial fishing has many social benefits and we would urge that fishing is also included as part of Theme 2 (social – see below).	There is relatively little commercial fishing ongoing within the Severn Estuary and due to the spatial constraints of the document, it is impossible for the Strategy to reference every type of industry. The second paragraph on Page 6 reads: Ports, aggregates, chemical processing companies and power stations, as well as many others, all play a vital role in the economy and social structure of the area.	Noted, but no action
Outcomes			
A01	Outcome 1.2 - add ‘and respect’ after ‘a good understanding...’ This will tie the outcome more firmly into HLMO 1 (‘marine businesses...acting in a way which respects environmental limits’).	Text amended as per suggestion.	Page 7 Outcome 1.2
Actions			

AA1	Action 1.1.1, it is not clear which partnerships you are referring to. To LEPs? LNPs? CaBA partnerships?	Text amended to: Engage with all relevant strategic partnerships in the estuary to share best practice and good sustainable development principles.	Page 7 Action 1.1.1
AA2	Action 1.1.2: have the principles of sustainable development already been written? If not, who is going to develop them? Are these principles similar to the principles of the Strategy?	The principles of Sustainable Development can be found here: http://www.sd-commission.org.uk/pages/the_principles.html . This hyperlink has been added to Action 1.1.2. Text amended to read: One of the key roles of the Partnership is to promote the <u>Sustainable Development Principles</u> within the estuary. Also added into P4. Text added: The UN's Sustainable Development Goals explain that "a successful sustainable development agenda requires partnerships between governments, the private sector and civil society."	Page 7 Action 1.1.2 Page 8 Para 4 Page 12 Para 4
AA3	There could be an action to identify a number of new, sustainable, wealth-creating opportunities that are made possible by proximity of the Severn estuary.	This suggested action is beyond the scope and resources of the Partnership.	Noted, but no action
AA4	P7, para 1.2.1 – is there scope to develop business Case Studies as part of this list of SEP actions?	Action amended to read: Recognise and champion businesses and consumers who show they embed sustainable development in practice, developing "Business Case Studies" where appropriate.	Action 1.2.1 Page 7
AA5	Also how about adding a new action here – it would be great if the SEP could support partner bidding activity to help deliver sustainable economic development.	This action is beyond the scope and resources of the Partnership.	Noted, but no action

4.0 Theme 2 – Ensuring a Strong, Healthy & Just Society

Code	Comment Received	Response	Addressed? Page ref
E1	There is no mention of the Marine & Coastal Access Act 2009 which is directly applicable to Outcome 2.1 and the references in the text in regard to the Wales and South West Coast Paths.	Text amended to: Locals and visitors can access the coast through the Wales Coast Path, Severn Way and England Coast Path; provision of the paths is supported under the Marine and Coastal Access Act (2009) .	Page 8 Para 3
E2	Should there be mention of the Severn Way as well as the Wales and South West Coast paths?	Text amended to: Locals and visitors can access the coast through the Wales Coast Path, Severn Way and England Coast Path; provision of the paths is supported under the Marine and Coastal Access Act (2009) .	Page 8 Para 3
E3	In the third paragraph (2nd sentence)it would be helpful to include bird or nature watching as it is a recreational activity that makes a direct link between people, well-being and environmental awareness. Not sure what beach-beach activities are – is this a typo?	Agree. Typo changed and text amended to: There are a wide range of other recreational activities that occur alongside the Severn Estuary, including bird watching, recreational boating, walking, angling and other land and beach-based activities.	Page 8 Para 2
E4	P8 - refers to access via two named coastal paths, but should also refer to the Severn Way, which is the nationally designated path which follows the English side of the Severn from the north side of Avonmouth to the source in the Welsh Hills.	Text amended to: Locals and visitors can access the coast through the Wales Coast Path, Severn Way and England Coast Path; provision of the paths is supported under the Marine and Coastal Access Act (2009) .	Page 8 Para 3
E5	P8 - presumably you have someone proof-reading(I saw a couple) but 'beach-beach' must be an error, or else needs explanation.	Typo changed.	Page 8 Para 2
E6	We think that “Principle 2 – Ensuring a Strong, Healthy and Just Society” is way beyond the scope of the Partnership. This is really what national Government should be concentrating on. The theme of this principle seems to be about the Estuary and the public living in harmony and each “respecting” the other so perhaps this Principle could be titled – “Ensuring a harmonious coexistence between communities and nature”	The Partnership appreciates that many others may have a greater role in helping delivery this Principle. The Strategy applies the five HLMOs, which should assist users in following the Strategy alongside statutory requirements in the Marine Policy Statement. Adopting	Noted, but no action

		this common framework also promotes cross-border marine planning compatibility and integration.	
E7	The maintenance of Sea defences and not setting back any further should be within this principle in order to protect communities. Actions to support this should be defined	This action is beyond the scope and resources of the Partnership.	Noted, but no action
E8	Theme 2 – We feel the commercial fishing sector should be mentioned here as well as Themes 1 and 3 to reflect the social importance and benefits of commercial fishing within the estuary.	There is relatively little commercial fishing ongoing within the Severn Estuary and due to the spatial constraints of the document, it is impossible for the Strategy to reference every type of industry. The second paragraph on Page 6 reads: Ports, aggregates, chemical processing companies and power stations, as well as many others, all play a vital role in the economy and social structure of the area. Amendments on Page 10: It supports commercial fisheries, as well as...	Page 10 Para 1
E9	Theme 2 – We consider it would be beneficial to split cultural heritage between themes 2 and 3. Thus, the ‘historic environment’ (ie heritage assets etc) should be included under Theme 3, but that aspects of ‘cultural heritage’ (ie social benefits and associations derived from the historic environment) be included in Theme 2. This would also better reflect the MPS and HLMOs where cultural heritage is considered under the social HLMO.	Agree that this should be amended to reflect the MPS and HLMOs. Objective 2.1 amended to: To actively promote responsible, equitable and safe access to the diverse natural environment and cultural heritage of the estuary. Action 2.1.1 updated to: Promote the benefits of living and working alongside a sustainable estuary and iconic seascape and landscape, with a rich cultural heritage. Seascape definition (Natural England) text box added to Page 8. Action 3.1.2 amended to: Promote research to achieve a strategic understanding of the estuary’s historic assets and aquatic and natural	Page 9 Objective 2.1 Page 9 Action 2.1.1 Page 8 Page 11 Action 3.1.2

		environment to determine impacts of development and coastal processes, and inform decision-making.	
E10	Theme 2 –The description would benefit from specific mention of the value of seascape. We recommend use of seascape throughout the SES. Would you consider adding as an objective in its own right?	Natural England definition added to Page 8. Text amended: The iconic Severn Estuary shores and seascape affect the quality of lives of all people who live near it, as well as others who visit or gain benefit from the use of its resources. Action 2.1.1 amended: Promote the benefits of living and working alongside a sustainable estuary and iconic seascape and landscape, with a rich cultural heritage.	Page 8 Text box Action 2.1.1
E11	Theme 2, Fourth Paragraph – Apologies for being utter pedants, but we believe the reference to the second highest tidal range in the world, should be amended to the ‘third highest’? [Bay of Fundy 11.7m, Ungava Bay 9.7m, Severn Estuary 9.6m.]	Amended to: The tidal range is the one of the highest in the world	Page 8 Para 4
E12	Theme 2, Second paragraph – ‘Well-being and future generations Act’ is cited as 2016, should be 2015	Amended as per suggestion.	Page 8 Para 2
E13	It would be useful to specifically mention ‘health’ somewhere in the objectives, outcomes or actions. This would more clearly support the relevant HLMO and principle 2 (at the top of page 9).	Amended to: The health, physical and mental well-being of communities is enhanced through better appreciation of the diversity of seascape, natural and cultural heritage of the Severn Estuary. Addition of Action 2.2.3: Support healthier communities through the promotion of recreational activities across the estuary.	Page 9 Outcome 2.2 Action 2.2.3
Outcomes			
EO1	Outcome 2.2 – This is rather vague as written. Would it be better to include more of the HLMO descriptor, something like, ‘The physical and mental well-being of communities is enhanced through better appreciation of the diversity of seascape, natural and cultural heritage within the Severn Estuary’.	Amended to: The health, physical and mental well-being of communities is enhanced through better appreciation of the diversity of seascape, natural and cultural heritage of the Severn Estuary.	Page 9 Outcome 2.2
Actions			

EA1	2.1.4 Promote and support access to the environment for the communities and 2.2.3 Support recreational activities	Agree. Action 2.1.4: Locals and visitors can access the coast through the Wales Coast Path, Severn Way and England Coast Path; provision of the paths is supported under the Marine and Coastal Access Act (2009) . Addition of Action 2.2.3: Support healthier communities through the promotion of recreational activities across the estuary.	Page 9 Action 2.1.4 Action 2.2.3
EA2	As well as sharing information it would be good if this theme could go a bit further to promote the understanding of this shared resource and the implications of plans and activities on environmental, social and cultural services provided by the estuary.	Addition of Action 2.1.5: Promote the understanding of the estuary as a shared resource and the potential implications of plans and activities on environmental, social and cultural services.	Page 9 Action 2.1.5
EA3	Action 2.2.2. Again 'Explore' is vague. We appreciate there's value in having the actions relatively open, but could something be added such as 'Explore and propose the indicators...' to better encourage the measuring of well-being indicators?	Amended as per suggestion.	Page 9 Action 2.2.2

5.0 Theme 3 – Living within Environmental Limits

Code	Comment Received	Response	Addressed? Page ref
L1	The third theme "Living Within Environmental Limits" highlights the great diversity of the Estuary and the special designations but the strategy only focusses on the environmental regulations without offering a forward approach in terms of environment improvements. It doesn't show any ambitious views of the environment in the strategy.	Objective 3.1 is clear that the Strategy will aim to protect conserve and enhance the rich biodiversity and help to achieve health, resilient and adaptable ecosystems. It is considered that although the introductory text states only the regulations it is in the objectives where the Strategy is clear with its ambition.	Noted, but no action
L2	highlights the great diversity of the Estuary and the special designations but the strategy only focusses on the environmental regulations without offering a forward approach in terms of environment improvements. It doesn't show any ambitious views of the environment in the strategy.	Objective 3.1 is clear that the Strategy will aim to protect conserve and enhance the rich biodiversity and help to achieve health, resilient and adaptable ecosystems. It is considered that although the introductory text states only the regulations it is in the objectives where the Strategy is clear with its ambition.	Noted, but no action

L3	the environment should be promoted as strength of the Estuary for its special designations more than a limit which shows to more a negative picture of the environment.	Agree with the comment made that it is important to show the environment as a strength. However it is considered that the text does this.	Noted, but no action
L4	Whilst the Partners will be familiar with the various national and international designations covering the Severn Estuary, members of the public may not be (other than a general 'awareness'). If this is intended for wider public consumption too (page 5 states that it is 'for the whole of the Severn Estuary region')it might be useful to have a description of the designations, the legislation behind them and the various species and habitats for which it is protected as part of the introduction. Otherwise, they are not mentioned until the third Theme and even then it is not entirely clear which designation protects what	The text explains that they are nature conservation designations. Given the spatial constraints of the document, it is impossible to set out such factors in full within this Strategy document.	Noted, but no action
L5	The eNGOs mentioned in question 7, along with CPRE, Salmon and Trout Assoc and Severn Rivers Trust are working together on a Severn Vision project. The Vision for the Severn is one where the estuary o ls restored as a healthy functioning ecosystem, valued for its internationally important wildlife, habitats and landscapes. o Provides more benefits for people, local communities, places, and economies, including greater resilience to climate change. o Becomes a natural powerhouse, where development is planned and managed in a way that sustains and enhances the estuary's resources. I feel that the Severn Vision would add strength to the Severn Estuary Strategy and hope that NGOs can be involved, going forwards.	The Vision is hyperlinked and referenced in the textbox on Page 12. Engagement and involvements from NGOs would be most welcome.	Page 12 Box of estuary-wide plans
L6	Marine litter is also an increasing issue and Wessex Water is funding the Somerset Litter Free Coast and Sea project alongside the Environment Agency and Sedgemoor District Council. Further information on the project can be found at http://www.litterfreecoastandsea.co.uk/	Action 3.1.1 can be updated to include reference to Marine litter. Text amended to: Promote and disseminate existing and emerging information to industry, communities and organisations on the wise use of water, prevention of litter and pollution and improvements to water quality across the estuary.	Page 11 Action 3.1.1
L7	As per the above, this section/theme (page 10) should also refer to the coastal floodplain outside the SPA/Ramsar as it is critically important for wildfowl associated with the Estuary in providing high tide roosts.	Agree, text amended to: The estuary is an important migratory route for salmon and internationally rare fish species such as shad as well as providing high tide roosts for internally important wildfowl.	Page 10 Para 1
L8	The third paragraph on page 10 states: 'The area is well known for its archaeological and historic features interest'. The coastal floodplain to the Estuary is, in fact, nationally	Agree, text amended to:	Page 10 Para 3

	important for archaeology due to the high degree of preservation of materials imparted by the waterlogged ground conditions and this recognition should be reflected in the wording.	The area is well known for the wealth of nationally recognised archaeological and historic features.	
L9	There is also no mention at all of geology/geomorphology: there are nationally important geological sites immediately alongside the Estuary.	Agree. Agree, text amended to: The Severn Estuary is a huge, diverse area with many fascinating natural, cultural, geographical and geological features.	Page 10 Para 1
L10	The top right hand box has a list of designated areas. The last item 'Nature Improvement Area' should be plural not singular as although there is the Severnside Wetlands one in the West of England (which this probably refers to http://www.wenp.org.uk/wp-content/uploads/2015/03/Severnside-Wetlands-NIA.pdf) there is a slightly longer established contiguous one in adjoining Gloucestershire called the 'Severn Vale' (see side box on this webpage http://gloucestershirenature.org.uk/delivery/index.php). So all we need to do is make the last item 'Nature Improvement Areas' especially as other NIAs may be established in the future.	Agree with proposal. Text amended to read 'Nature Improvement Areas'.	Page 10 Text box
L11	In the second paragraph (2 nd sentence) please insert 'has a membership of most of' between '(ASERA)' and 'the' . this is required otherwise the reader may think that all Relevant Authorities are part of ASERA.	Agree with proposal. Text amended to read: ASERA has membership of most of the statutory organisations around the Severn Estuary...	Page 10 Para 2
L12	In the fourth paragraph (2 nd sentence) is it wise to quote the EU Directives in this way given 'Brexit' and the timescale of this new strategy? It might be better to start the sentence with something like – 'International obligations and national legislation such as the Flood and Water Management Act (Wales) set.....'	Until exit negotiations are concluded, the UK remains a full member of the European Union and all the rights and obligations of EU membership remain in force. Any changes to UK legislation/policy will need to be considered in a update to the Strategy. Footnote to page 10 has been added: *The Strategy will be revised in light of significant government or legislative changes, where necessary.	Added footnote Page 10
L13	P10 - reference is made to EU Directives, but given the disastrous vote in June this year there perhaps ought to be a few lines added to say what our position is(and will be) in the event of us leaving EU vis-a-vis the various EU directives and legislation that benefit the estuary. Perhaps this should also be added in the actions.	Until exit negotiations are concluded, the UK remains a full member of the European Union and all the rights and obligations of EU membership remain in force. Any changes to UK legislation/policy will need to be considered in an update to the Strategy.	Added footnote Page 10

L14	The Government has licenced exploration of “fracking” potential on both the English and Welsh sides of the estuary. This needs to be built into the strategy as this activity could destabilise the fragile eco systems of the estuary and a common stance on the practice will be helpful	The Partnership acts as a neutral facilitator across the estuary, sharing information to inform stakeholders of activities of activities ongoing within the estuary. Therefore, it is not within the remit of the Partnership or the Strategy to cover this.	Noted, but no action
L15	Theme 3 – Living within environmental limits. No mention of commercial fishing (mentions recreational fishing only). Again, the MMO believes commercial fishermen are a vital link in the ecosystem of the Severn Estuary and would seek for their inclusion in Theme 3 (in addition to inclusion of economic and social aspects under Themes 1 and 2 respectively). Environmental aspects of commercial fishing are important in Severn Estuary.	Agree. Text amended to: It supports commercial fisheries, as well as....	Page10 Para 1
L16	Theme 3 – Cultural heritage. As outlined above (page 8) we recommend cultural heritage be split between themes 2 and 3. Theme 3 could concentrate on the actual assets of the historic environment, while Theme 2 could be specific to cultural heritage derived from the historic environment. This would also better reflect the MPS and HLMOs.	Agreed – see above comment E9.	See comment E9
L17	Theme 3 – Ecosystem Services. This has been referenced by stakeholders as important to them. Consequently ecosystem services would benefit from being explicitly highlighted as part of Objective 3.1 (p.11) for example, or as an outcome.	The Strategy takes an ecosystem services approach and it is considered that objectives and actions need to be specific at this stage. Text amended to: The Severn Estuary is a huge, diverse area with fascinating natural, cultural, geographical and geological features that support many ecosystem services.	Page 10 Para 1
L18	There is another mention of Severn as second highest tidal range in world (see page 8). May be worthwhile mentioning that Severn Estuary is home to around 110 species of fish, many of which are commercially valuable (bass and rays)?	Whilst we recognise the importance of such species, given the spatial constraints of the document, it is impossible to set out such factors in full. The SEP website includes details: http://www.severnestuarypartnership.org.uk/sep/estuary/physical-natural-environment/	Noted, but no action
L19	Fourth Paragraph. Suggest that the reference be to the ‘Flood and Water Management Act 2010’ as it is UK-wide and not just Wales.	Agree. Text reworded to read: Legislation such as the EU Water framework directive, EU Bathing Water Directive and the Flood and Water Management Act 2010 sets ambitious....	Page 10 Para 4
L20	This page talks about ‘industry and communities’ (e.g. in action 3.1.1). Other organisations/sectors outside of these groups (e.g. universities, regulators) could be added	Agree. Amended text to:	Page 11

	to such instances – for example action 3.2.3. SEP are already doing this, so probably no change to current activities, but it would be good to recognise the diversity of groups working, or have an interest, in the Severn Estuary. We recommend the use of a more inclusive term e.g. ‘people’.	Promote and disseminate existing and emerging information to industry, communities and organisations on the wise use of water, prevention of litter and pollution and improvements to water quality across the estuary.	Action 3.1.1
Outcomes			
LO1	Theme 3, page 10 - Heritage Coasts & AONBs are landscape, rather than nature conservation designations Principle 3 could have a landscape & seascape outcome under 3.1 communities and industry understanding	<p>Textbox amended to: What are the landscape and nature conservation designations protecting the Severn Estuary?</p> <p>Action 3.1.2 amended to: Promote research to achieve a strategic understanding of the estuary’s seascape and historic, aquatic and natural environment to determine impacts of development and coastal processes, and inform decision-making.</p>	Page 10 Text box Page 11 Action 3.1.2
LO2	With regard to Outcome 3.1, the draft plan states that “Improving water quality and ensuring the sustainability of water resource management is essential to avoid negative impacts on the aquatic environment, communities and the economy. Legislation such as the EU Water Framework Directive, EU Bathing Water Directive and the Flood and Water Management Act (Wales) set ambitious targets to help improve and protect the water environment for communities in the UK now and in the face of climate change”. Outcome 3.1 does not reference the aquatic environment specifically, and whilst it is assumed that this outcome covers the requirements outlined within Theme 3 on water quality, it could be made more explicit, (“historic, aquatic and natural environment”?). As the aquatic environment is one of the key elements of the Severn Estuary and with many bodies in and around the Estuary working towards achieving the goals outlined, there should be an explicit reference to water quality in at least one outcome.	<p>Agree. Outcome 3.1 text amended to: Communities and industry have a better understanding of the historic, aquatic and natural environment and the ecosystem services they provide, leading to more sustainable management.</p> <p>Action 3.1.2 amended to: Promote research to achieve a strategic understanding of the estuary’s seascape and historic, aquatic and natural environment to determine impacts of development and coastal processes, and inform decision-making.</p>	Page 11 Outcome 3.1 Action 3.1.2
LO3	Regarding the Outcomes on page 11, surely, one of the Outcomes is to ‘contribute towards maintaining the Severn Estuary European Site in a favourable conservation status to benefit all its ecological interests for future generations to enjoy’?	<p>That is a requirement of the Relevant Authorities and, although supported by the Partnership, is not for the Strategy to achieve.</p> <p>Action 3.2.5 has been added to:</p>	Page 11 Action 3.2.5

		Promote educational materials on the various internationally important species and habitats associated with the Severn Estuary.	
LO4	Outcome 3.2.1. This refers to '...continued protection of the dynamic environment'. We feel the 'the' should be deleted and replaced with an 'a'.	Agree. Amend the text to read: Sustainable use and management of natural resources for the continued protection of a dynamic environment.	Page 11 Outcome 3.2.1
LO5	Outcome 3.2.2. This could be stronger. Whilst it's important that the threats are '...understood and discussed...' it is essential to help ensure communities are able to <u>respond</u> to climate change threats. It is suggested the outcome be tweaked to something like '...understood, discussed and solutions and necessary adaptive behaviour identified...'	The text has been amended to: Implications of climate change are understood and discussed widely by both communities and industry throughout the estuary, to enable more informed responses and action.	Page 11 Outcome 3.2.2
Actions			
LA1	3.1.4 Understand the natural capital of the environment within the Estuary and understand the impact of endangered-habitats/species loss. 3.1.5 Identify opportunity areas of environmental improvements	Such understanding when gained from SEP partners or research would be disseminated by the Partnership.	Noted, but no action
LA2	Is sea level rise included under Outcome 3.2.2? If not the threat from rising sea levels, or vulnerability to the region from extreme events such as storm surge or even tsunami risk, needs to be factored-in. Also 'promote research' under 3.1.2 is good, but funding and political buy-in is required to ensure that resources are made available on both sides of the estuary.	Sea level rise is included under outcome 3.2.2. The funding and political buy-in are beyond the scope of this Strategy it is hoped that by achieving these actions such out puts would be achieved or at least the evidence would be available for this to occur.	Noted, but no action
LA3	Suggest an action relating to landscapes & seascapes at 3.1 - promote research & management	Action 3.1.2 amended to: Promote research to achieve a strategic understanding of the estuary's seascape and historic, aquatic and natural environment to determine impacts of development and coastal processes, and inform decision-making. Action 2.1.1 amended to: Promote the benefits of living and working alongside a sustainable estuary and iconic seascape and landscape.	Page 11 Action 3.1.2 Page 9 Action 2.1.1
LA4	Living within Environmental Limits landscapes & seascapes	As above.	See LA4
LA5	You include enhancing the natural environment in the aims, but this isn't reflected in the actions. It would be great to see a more positive mention about enhancing the natural environment, rather than just protecting what is already there.	Agree that enhancement is an important factor but that it is considered that the actions do not preclude this	Noted, but no action

		and their successful outcomes should result in protection and in some cases enhancement.	
LA6	Action 3.1.1 - This could be expanded to “Promote and disseminate existing and emerging information and projects to industry and communities on the wise use of water, prevention of pollution and improvements to water quality which will benefit the Estuary”. As funding becomes more constrained, it is important that there is maximum opportunity for buy-in to existing or planned projects from multiple sources (both private and public). This will not only increase the prospect of achieving more sustainable funding, but also provides opportunities to deliver multiple outcomes from projects.	Agree. Amend wording to read: Promote and disseminate existing and emerging information to industry, communities and organisations on the wise use of water, prevention of litter and pollution and improvements to water quality across the estuary.	Page 11 Action 3.1.1
LA7	There is also no mention in Actions of promoting and educating the public in the various internationally important species and habitats associated with the Severn Estuary. Action 3.2.2 refers to ‘continuing to disseminate information on energy generation schemes’. Whilst realising what this means in practice, it perhaps needs re-wording slightly: there’s a difference between letting partners know about proposals and promoting the Estuary’s use when we don’t know if the schemes in question will be damaging, either on their own or through in combination effects.	Addition of Action 3.2.5: Promote educational materials on the various internationally important species and habitats associated with the Severn Estuary.	Page 11 Action 3.2.5
LA8	Under living within environmental limits, why is there a positive action to maintain favourable conservation status for biodiversity, but not for the historic environment? Nature conservation has the benefit of statutory protection, but archaeology maybe less protected and therefore in more need of specific action? and given vulnerability to flooding should there also be an action relating to flooding?	Maintaining <i>favourable conservation status</i> is the terminology taken from regulation. It is considered that Action 3.1.2 does what it can towards protecting the historic environment at this time. Archaeology is also protected under law and national policy. Actions 3.2.3 and 3.2.4 are specifically related to flood risk.	Noted, but no action
LA9	Action 3.2.2 – Recommend this section is expanded to specify <u>renewable</u> energy specifically. There is definitely appetite for renewable energy development amongst many of the stakeholders, and it will tie into the environmental section nicely.	The Strategy takes a broad view of energy generation, which includes all types of energy generation, including renewables.	Noted, but no action

6.0 Theme 4 – Promoting Good Governance

Code	Comment Received	Response	Addressed? Page ref
P1	include an objective to promote good practice on a catchment scale by making a link with existing CaBA partnerships	Outcome 4.1.1 amended to: All coastal and marine practitioners and stakeholders have the opportunity to work together, contribute	Page 13 Outcome 4.1.1

		relevant data and influence decision-making processes at a catchment scale. Addition of Action 4.1.5: Promote good practice on a catchment scale by developing links with existing Catchment-based Partnerships.	Action 4.1.5
P2	In the bottom right hand box next to the item 'Severn Vision' we should add whose vision this is to avoid confusion with the vision set out in the Severn strategy itself (page 5). I understand this 'Severn Vision' will be launched shortly by a group of NGOs some of which are SEP members.	Text amended to: <u>Severn Vision</u> – a vision for nature in the estuary produced by NGOs representing wildlife and landscape interests	Page 12 Text box
P3	In the 3 rd paragraph (2 nd sentence) again) is it wise to quote an EU Directive in this way given 'Brexit' and the timescale of this new strategy? It might be better to start the sentence with something like – 'Under international and national obligations such as the Marine and Coastal Access Act, there will be two ...'.	Text amended to: Under national and international obligations such as the <u>Marine and Coastal Access Act (2009)</u> ...	Page 12 Para 4
P4	Cross border/cross water cooperation is vital. The actions listed (once detailed) may be strong enough	Noted	Noted, but no action
P5	4.1.3 – typo: 'projects'. 4.2.3 – typo: 'wider'.	Amended as per suggestion.	Page 12 Actions 4.1.3 and 4.2.3
Objectives			
POb1	The Objective 4.1 could host another outcome or widen the Outcome 4.1.1 to the other CaBA Partnerships and other relevant partners.	Outcome 4.1.1 amended to: All coastal and marine practitioners and stakeholders have the opportunity to work together, contribute relevant data and influence decision-making processes at a catchment scale. Addition of Action 4.1.5: Promote good practice on a catchment scale by developing links with existing Catchment-based Partnerships.	Page 13 Outcome 4.1.1 Action 4.1.5
POb2	Outcome 4.1 should be expanded to include the relevant Catchment Partnerships operating within the area (for further information, please see additional notes included in response to Question 8). The Estuary does not exist in isolation and many issues affecting it originate	As above.	See POB1

	upstream in the river catchments feeding into the Estuary. Involvement with the Catchment Partnerships should be a key requirement in order to link up the rivers and the projects being undertaken on them with the wider Estuary in order to maximise the impact of research, investment and multiple benefit solutions.		
POb3	Objectives 4.1 and 4.2. These are key objectives from the MMO's perspective, so we are keen to see them retained. SEP's role in promoting partnership working and encouraging integration is crucial to the development of effective and complementary marine plans for SW England and Wales.	Many thanks – noted.	Noted, but no action
POb4	Objective 4.2. To tie in with the HLMO it is recommended to amend 'To encourage integration between all estuary-related plans and governance structures, ensuring plan-led regulation and cross-sectoral and cross-boundary consistency whilst taking an ecosystem-based approach to management'.	Agreed. Amended to: To encourage integration between all estuary-related plans and governance structures, ensuring plan-led regulation and cross-sectoral and cross-boundary consistency whilst taking an ecosystem-based approach to management.	Page 13 Objective 4.2
Actions			
PA1	Promoting Good Governance 4.2.2 should include reference to Local Transport Plans (LTPs)	Whilst we recognise the importance of such local plans, given the spatial constraints of the document, it is impossible for the Strategy to refer to all types of plans and strategies. Action 4.2.2 amended to: Actively engage with all relevant strategic plans and developments to promote our principles.	Page 13 Action 4.2.2
PA2	Needs to take into account post-'Brexit' possibilities, resisting any attempts to pull back from taking forward good environmental stewardship.	Addition of Action 4.1.4: Promote information on and engage with the Brexit debate and its implications for the estuary.	Page 13 Action 4.1.4
PA3	This may seem obvious, but I am not sure that the Governance actions currently are specific enough in respect of the role of SEP. Given the potential for fragmentation due to the differing governance arrangements across the estuary, is there a need for SEP actions to specifically 'promote the integrated management of the Severn Estuary as a whole'.	It is considered that the text on Page 12 and Objective 4.2 and Outcome 4.2 support this statement.	Noted, but no action
PA4	The principle 4; promoting good governance could include an objective to promote good practice on a catchment scale by making a link with existing CaBA partnerships.	Addition of Action 4.1.5 Promote good practice on a catchment scale by developing links with existing Catchment-based Partnerships.	Page 13 Action 4.1.5

7.0 Theme 5 – Using Sound Science Responsibly

Code	Comment Received	Response	Addressed? Page ref
U1	It would be useful to have local (environmental) records centres referenced here. At a time when LRCs are increasingly threatened by national databases, they provide a critical conduit between local recorders and the use of that data in environmental research. They would be a major player in Outcome 5.2 and Action 5.2.1 and it seems that there could be an important role for them to play in monitoring climate change in partnership, say, with universities and British Trust for Ornithology (BTO) such as analysing how the distribution of species of wildfowl change year or year in response to changing weather conditions.	Agree. Text amended to read: Local Environmental Record Centres provide a valuable and important source of information on the natural environment.	Page 14 Para 1
U2	Under sound science: concerns are often expressed about a lack of understanding about e.g. renewables projects/ aggregates extraction on other parts of the estuary, in terms of erosion and deposition? Therefore is there a need for the SEP to promote better understanding of the sediment cycle across the wider estuary?	The importance of understanding sediment transport in the estuary is recognised by SEP. Though we have shown climate change impacts as an area to promote, we have chosen not to further rank knowledge areas at this stage. Whilst sediment transport will not feature as a specific aspect to promote, SEP will be mindful of your comments in its future work. This concern will also be passed on to the Severn Estuary Coastal Group.	Noted, but no action
U3	A reminder that the Severn Estuary and Levels Research Committee exists to bring together academic and other archaeologists researching the archaeology and past environment of the Severn Estuary. http://www.selrc.org.uk/contact_get_involved.html	Agree. Text amended to read: In the past, SEP has been involved in facilitating and coordinating science-policy topic groups, such as the Severn Estuary Climate Change Advisory Group and hopes to stimulate further similar initiatives in the future. The existing long-term partnership of the Severn Estuary and Levels Research Committee has brought together academic and other archaeologists researching the archaeology and past environment of the Severn Estuary.	Page 14 Para 1
U4	“The Severn estuary is fragile and has many sensitive habitats.....” (your words). The collection and maintenance of accurate data to support this assertion and to provide early warning of changes is critical.	SEP supports coordinated action on gathering data on common issues, as outlined in Action 4.1.1.	Noted, but no action

U5	Third paragraph: this mentions citizen science growing in popularity around the estuary, but it might be worthwhile mentioning that it is also used nationally to emphasise its importance.	Agreed and text amended to: Citizen science provides key data gathering opportunities to inform a wide range of ecological and environmental research. It is growing in popularity with the public and wider communities around the estuary, as well as nationally.	Page 14 Para 3
Outcomes			
UO1	Outcome 5.2 ‘...better disseminated scientific and socioeconomic research and data.’ Socioeconomics is a science so could rephrase to just ‘...better disseminated scientific research and data.’	Text amended to: Widespread and improved understanding of the estuary acquired through better disseminated scientific research and data.	Page 15 Outcome 5.2
Actions			
UA1	Concerned that the Forum is not the best place to achieve the objectives. Evaluate role of the Forum - I think it has a dual purpose in the draft strategy; for promoting scientific knowledge but also stimulating lively debate. I'm not sure you can achieve both at the same time.	Agree. Text amended to: To identify evidence gaps and improve the quality of data available.	Page 15 Objective 5.2
UA2	I wonder if there is scope to convene a separate scientific/evidence-sharing workshop/group; perhaps that meets on Joint Estuary Days. This may allow the forum to be more lively with more space for discussion and debate.	Agree. Action 5.1.1 updated to: Facilitate an evidence sharing-workshop, which brings together academic institutions and other organisations to identify the latest thinking and evidence for decision-making.	Page 15 Action 5.1.1
UA3	Could an action be added along the lines of ‘showcase effective use of good science in decisions’, to celebrate specific examples of where evidence has been used to inform a decision and brought about real change? This is about celebrating as good practice some of the excellent work around the estuary, and it might also encourage other decision-makers to follow suit by promoting good decision-making.	SEP’s role includes engaging with scientist and encouraging and showcasing co-production between scientists and decision-makers. Addition of Action 5.2.5: Support the engagement of scientists in topical Severn Estuary issues and encourage co-production between scientists and policy-makers.	Page 15 Action 5.2.5
UA4	Action 5.2.2. This focusses very much on climate change, which whilst very important, does not leave room for science on other topics. Suggest rewording to something like ‘Promote the understanding of science relevant to the Severn Estuary and its stakeholders, such as impacts of climate change, adaptation measures and mitigation.’	Agree and amended as per suggestion.	Page 15 Action 5.2.2

UA5	<p>An example of where the draft Strategy aligns with our work is our Ecosystems Enhancement Programme (EEP) and the 'Using Sound Science Responsibly' principle. For example, our research focus includes collaboration with universities and investment in trialling innovative techniques for habitat creation (reef rolls, floating islands, restoration of subtidal habitat), aligns with <i>Objective 5.1 'Signpost relevant data and evidence to improve evidence-based decision-making'</i> and <i>Action 5.1.1</i> which seeks to facilitate bringing together academic organisations and others to identify latest thinking and evidence for decision making. In another example, <i>Objective 5.2</i> and <i>Action 5.2.1</i> of the draft Strategy is aligned with our objective under EEP to <i>restore and create new wetland sites to maximise biodiversity and afford opportunities for climate adaptation, flood risk management, the historic environment, green tourism and education</i>; supported by an action to <i>deliver maximum community amenity through local community involvement in some sites, for example, through the development of citizen science and heritage centred initiatives and/or education materials</i>.</p>	<p>Many thanks for your comments; SEP will acquaint itself of the Ecosystem Enhancement Programme.</p>	<p>Noted, but no action</p>
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