

### **B10.2.4.1 CONSULTATION FEEDBACK RESULTING IN CHANGES TO SMP POLICY AND / OR DOCUMENTATION – *CHICHESTER DISTRICT COUNCIL***

<b>Comment relates to</b>	<b>Chichester District Council</b>	<b>Consultee</b>	<b>Private individual</b>	<b>Response No</b>	<b>57</b>
<b>Revisions to SMP</b>	<b>Definition of AM – Adaptive Management added to the final documents</b>				
<b>Comment received</b>			<b>Client Steering Group Response</b>		
<p>I found the language (written) at the exhibition quite hard to fathom- it rather seemed to be in some sort of something speak that I couldn't really make much sense of although I realize that not knowing business (for want of a better term) phraseology may have contributed to my difficulty . I could have done with it all being simpler and clearer. Having said that I thought visually it was very well presented.</p> <p>I took the SMP brochure home and spent more time with it and found that it was more comprehensible and again beautifully presented.</p> <p>On the proposed policies page there was no explanation of the letters AM for East Head. But I assumed this would be Adaptive Management because of the situation with the 'hinge' there.</p> <p>Elsewhere, where managed realignment is appropriate this seems an excellent situation- not quarrelling with nature. I so feel that environmental concerns are crucial. I have lived in Chichester area for most of 50 years and feel passionately about the harbour and nearby coastal areas and hope that great care will be taken to look after these in a sensitive, natural and non-interfering way as possible. Thank you.</p>			<p>Thank you for your consultation response . We tried to make the information presented as easy to understand as possible without losing too much of the technical detail. In the final documents the definition and abbreviation of Adaptive Management (AM) will be included. The assessments and development of the final coastal flood and erosion risk management policy aim to result in economically, socially and environmentally sustainable management of the shoreline.</p>		

<b>Comment relates to</b>	<b>Chichester District Council</b>	<b>Consultee</b>	<b>Selsey Town Council</b>	<b>Response No</b>	<b>97</b>
<b>Revisions to SMP</b>	<b>Unit 4D27 included in the North Solent SMP</b>				
<b>Comment received</b>			<b>Client Steering Group Response</b>		
<p>Selsey people will be surprised to see that the two frontages that most concern them - Medmerry (5a01) and Selsey (4d27) – though part of the Pagham to East Head Coastal Defence Strategy (PEHCDS), are split between 2 different Shoreline Management Plans (SMP). Whilst understanding that the recommendations of the PEHCDS are likely to be adopted by both SMPs, surely it makes sense to have the Medmerry and the Selsey frontages as part of one SMP. It complicates the matter for local people as they have to keep track of 2 SMPs. Also, surely it leads to unnecessary duplication of work for the operating authorities as they both try to communicate and engage with the same community each time the SMPs come up for review. 5a01: Selsey West Beach to Bracklesham (Medmerry) Selsey Town Council is represented on the Medmerry Stakeholders Advisory Group and has made detailed comments on the progress of the scheme within that forum. However, it is worth restating that the managed realignment at Medmerry is unique in that it is open to the sea and it will be facing some ferocious SW storms. In view of this the scheme as a whole should be completed in one stage so that all the inland bunds are in place before the breach is made. This would increase the confidence of local people in the efficacy of the scheme. As the town of Selsey already has a nature reserve (likely to be operated in the future by the RSPB) to the east with a fairly restrictive access, it is important to maximise the public access to the Medmerry reserve on the west. Having said that, it is understood that a balance has to be struck between the various community needs and those of nesting birds. The recent Medmerry map showing the aspirations and</p>			<p>Thank you for your consultation response. An SMP is a high level strategic document that recommends coastal flood and erosion risk management policy that will result in economically, socially and environmentally sustainable management of the shoreline over a large region. A Coastal Defence Strategy (CDS) is a more detailed study on a much shorter length of coastline that reviews the SMP policies and assesses how the policies will be implemented. The Pagham to East Head CDS is a review of the SMP policies from the first round East Solent and Beachy Head to Selsey Bill SMPs. Due to complexities associated with this frontage it has unfortunately resulted in the completion of the CDS shortly before consultation on the draft North Solent SMP. The outcomes and management policies from the Pagham to East Head CDS have been incorporated into the North Solent SMP. SMP boundaries are based on coastal processes and flood and erosion risks to properties and assets and unfortunately resulted in Selsey community being covered by 2 SMPs. The boundary in the vicinity of Selsey Bill will be reviewed in light of comments received from the coastal community. Once all of the SMP's around the entire coast of the UK are completed, central government will then be able to reassess national funding budgets and prioritise coastal defence expenditure to regions identified as being most at risk. Whilst the SMP recommends a policy of Hold the line or Managed Realignment this does not guarantee or secure central government funding for maintenance or urgent improvement works. Flood and coastal defence legislation in England and Wales is largely permissive i.e. there is no statutory duty to protect people or</p>		

<p>proposals is to be welcomed. Finally the statement contained in the SMP that ‘the new defences will be maintained on the retreated line over the next 100 years’ is most welcome. 4d27: Selsey Bill ( West Street to East Beach) part of the Beachy Head to Selsey Bill SMP- reviewed in 2005 and due to be signed off in 2010 As stated above it would make sense for this unit to become part of the North Solent SMP. Although the policy for this unit is ‘hold the line’ there is still no mention of the PEHCDS. In the PEHCDS the policy is ‘hold the existing defence line – sustain.’ However, it is anticipated that the policy outlined in the CDS will be implemented. Clearly the key issue here is funding and the challenge for the future will be to identify sources of funding to enable the policy to be implemented.</p>	<p>property.</p>
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Comment relates to	Chichester District Council	Consultee	Manhood Peninsula Steering Group	Response No	117
<b>Revisions to SMP</b>	<b>Boundary of SMP revised. Action plan now recommends the planning process refers to and takes account of the SMP and CDS recommendations and the recently published PPS25 guidance, for sustainable spatial planning.</b>				
Comment received			Client Steering Group Response		
<p>Strongly support SMP adopting PEHCDS. Reservations about methodologies used. Final should more robustly endorse PEHCDS, .e.g.. 5A01 uses MR but strategy localised HTL. The final draft NSSMP should give greater prominence to the fact that planners should refer to the PEHCDS for the detailed policies. Suggested comments see individual tabs. Includes changes to 5A01 summary and Appendix E and therefore G. Also H and boundary between SMP and next SMP.</p>			<p>Thank you for your response and suggested amendments. Your comments regarding a review of the existing SMP guidance are also noted. The SMP is a high level strategic document that recommends broad-scale coastal flood and erosion risk management policy that will result in economically, socially and environmentally sustainable management of the shoreline. The recommended policies identified through the Pagham to East Head Coastal Defence Strategy (PEHCDS) have been adopted for this length of shoreline. Whilst the SMP recommends a policy of Hold the line along this frontage it does not guarantee or secure central government funding. Although the North Solent SMP reflected the policy unit boundaries as</p>		

	<p>recommended from the PEHCDS, the boundary between the North Solent and the Beachy Head to Selsey Bill SMP has been revised. The SMP has applied the policy recommended for the length of coastline between Hillfield Road and West Street as identified in the PEHCDS. The PEHCDS details the expected levels of maintenance and improvement work required to defences and sources and likelihood of funding to undertake the necessary works. The SMP Action Plan will be recommending that the planning process be encouraged to refer to and take account of the SMP and CDS recommendations and the recently published PPS25 guidance, for sustainable spatial planning.</p>
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Comment relates to	Chichester District Council	Consultee	Private Individual	Response No	123
Revisions to SMP	Policy changed to reflect landowners intentions – 5A07				
Comment received			Client Steering Group Response		
<p>As the owner of Bosham MR, identified in policy unit 5A07, I wish to formally object to the proposed policy as it stands and see it revert to HTL. It is my intention to maintain/ repair my sea defences on this site for the duration of the Plan.</p>			<p>Many thanks for your response. Your objection to the proposed Managed Realignment policy is noted along with your intention to continue to maintain your defences. Within the North Solent region, landownership and third party funded maintenance of defences are acknowledged as key considerations. As stated during previous consultations, the policy for this frontage will be amended to reflect your comments and will revert to Hold the Line, with a clear statement that no public funding (from Grant Aid for flood defence and coastal protection) is available for the continued maintenance of the existing defences. Further detail on the expected levels of maintenance and improvement work required to defences will be included in subsequent Coastal Defence Strategy Studies and/or Schemes, which will look at how to implement the final SMP policies. This issue has been included within the Action Plan.</p>		

<b>Comment relates to</b>	<b>Chichester District Council</b>	<b>Consultee</b>	<b>West Wittering Estate Plc</b>	<b>Response No</b>	<b>126</b>
<b>Revisions to SMP</b>	<b>Policy changed to reflect landowner’s intentions – West Wittering.</b>				
<b>Comment received</b>			<b>Client Steering Group Response</b>		
Landowner opposed to potential MR at West Wittering			<p>Many thanks for your response. Your objection to the potential opportunity for localised inter-tidal habitat creation through a Managed Realignment policy is noted along with your intention to continue to maintain your defences. Within the North Solent region, landownership and third party funded maintenance of defences are acknowledged as key considerations. As stated during previous consultations, the policy for this frontage will be amended to reflect your comments and will revert to Hold the Line, with a clear statement that no public funding (from Grant Aid for flood defence and coastal protection) is available for the continued maintenance of the existing defences. Further detail on the expected levels of maintenance and improvement work required to defences will be included in subsequent Coastal Defence Strategy Studies and/or Schemes, which will look at how to implement the final SMP policies. This issue has been included within the Action Plan.</p>		

<b>Comment relates to</b>	<b>Chichester District Council</b>	<b>Consultee</b>	<b>Private Individual</b>	<b>Response No</b>	<b>128</b>
<b>Revisions to SMP</b>	<b>Policy changed to reflect landowner's intentions – 5A06</b>				
<b>Comment received</b>			<b>Client Steering Group Response</b>		
Landowner opposed to MR at Leggetts Farm (Fishbourne 5A06). Will be maintaining defences for foreseeable future.			Many thanks for your response. Your objection to the proposed Managed Realignment policy is noted along with your intention to continue to maintain your defences. Within the North Solent region, landownership and third party funded maintenance of defences are acknowledged as key considerations. As stated during previous consultations, the policy for this frontage will be amended to reflect your comments and will revert to Hold the Line, with a clear statement that no public funding (from Grant Aid for flood defence and coastal protection) is available for the continued maintenance of the existing defences. Further detail on the expected levels of maintenance and improvement work required to defences will be included in subsequent Coastal Defence Strategy Studies and/or Schemes, which will look at how to implement the final SMP policies. This issue has been included within the Action Plan.		

<b>Comment relates to</b>	<b>Chichester District Council</b>	<b>Consultee</b>	<b>Private Individual</b>	<b>Response No</b>	<b>131</b>
<b>Revisions to SMP</b>	<b>Policy changed to reflect landowner's intentions – 5A05</b>				
<b>Comment received</b>			<b>Client Steering Group Response</b>		
I am writing to register my objection to this MR plan. I wish existing shoreline to remain. I would be prepared to maintain my own sea defences indefinitely. (Ella Nore- 5A05)			Many thanks for your response. Your objection to the proposed Managed Realignment policy is noted along with your intention to continue to maintain your defences. Within the North Solent region, landownership and third party funded maintenance of defences are		

	acknowledged as key considerations. As stated during previous consultations, the policy for this frontage will be amended to reflect your comments and will revert to Hold the Line, with a clear statement that no public funding (from Grant Aid for flood defence and coastal protection) is available for the continued maintenance of the existing defences. Further detail on the expected levels of maintenance and improvement work required to defences will be included in subsequent Coastal Defence Strategy Studies and/or Schemes, which will look at how to implement the final SMP policies. This issue has been included within the Action Plan.
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<b>Comment relates to</b>	<b>Chichester District Council</b>	<b>Consultee</b>	<b>Private Individual</b>	<b>Response No</b>	<b>134</b>
<b>Revisions to SMP</b>	<b>Policy changed to reflect landowner's intentions – 5A07</b>				
<b>Comment received</b>			<b>Client Steering Group Response</b>		
As the owner of the Bosham MR, identified in policy unit 5A07, I wish to formally object to the proposed policy as it stands and see it revert to HTL. It is my intention to maintain/repair my sea defences on this site for the duration of the Plan.			Many thanks for your response. Your objection to the proposed Managed Realignment policy is noted along with your intention to continue to maintain your defences. Within the North Solent region, landownership and third party funded maintenance of defences are acknowledged as key considerations. As stated during previous consultations, the policy for this frontage will be amended to reflect your comments and will revert to Hold the Line, with a clear statement that no public funding (from Grant Aid for flood defence and coastal protection) is available for the continued maintenance of the existing defences. Further detail on the expected levels of maintenance and improvement work required to defences will be included in subsequent Coastal Defence Strategy Studies and/or Schemes, which will look at how to implement the final SMP policies. This issue has been included within the Action Plan.		

<b>Comment relates to</b>	<b>Chichester District Council</b>	<b>Consultee</b>	<b>A. D. Walter Ltd</b>	<b>Response No</b>	<b>141</b>
<b>Revisions to SMP</b>	<b>Policy changed to reflect landowner's intentions – 5A10</b>				
<b>Comment received</b>			<b>Client Steering Group Response</b>		
<p>5A10 Nutbourne            I will Hold the line. This is something that the farm has traditionally done and the seawall here is mostly that which the farm put in place and maintained anyway. This is good quality land which is increasingly becoming a vital resource as far as maintain food production. As witnessed by food shortages a couple of years ago leading to a doubling of grain prices. Some say our current recession is a direct consequence of this. Next door and to the west of this arable area is the Nutbourne marsh which is an important SSSI. Many rare species both plant and animal have been identified on this marsh. The village of Nutbourne is largely protected from the sea wall around the marsh and the arable fields at Nutbourne with the marsh providing a vital storm water storage at high tide when the sluice gates are shut. Difficult to see how if the arable area is open to the sea in the future how the marsh can be protected. It would be very helpful if someone could allow us to raise the seawall very slightly without the need for planning to reflect what would have been done in the past anyway. Also I believe the whole harbour should be protected and not enough work has been done on the effect of protecting the entire ecosystem in the harbour as a whole. This could be done by reducing the 2 inlets from the Solent to the size to allow the ingress of water similar to what it was in the 1950's say when we had a slightly lower water level at high tide and much more grazing grasses in the harbour. These grazing grasses supported a large bird population but also further protected the sea walls.</p>			<p>Many thanks for your response. Your objection to the proposed Managed Realignment policy is noted along with your intention to continue to maintain your defences. Within the North Solent region, landownership and third party funded maintenance of defences are acknowledged as key considerations. As stated during previous consultations, the policy for this frontage will be amended to reflect your comments and will revert to Hold the Line, with a clear statement that no public funding (from Grant Aid for flood defence and coastal protection) is available for the continued maintenance of the existing defences. Further detail on the expected levels of maintenance and improvement work required to defences will be included in subsequent Coastal Defence Strategy Studies and/or Schemes, which will look at how to implement the final SMP policies. This issue has been included within the Action Plan.</p>		

Comment relates to	Havant Borough Council & Chichester District Council	Consultee	Private Individual	Response No	158
Revisions to SMP	<b>5AH102 – The Policy has been changed here to reflect landowner intentions. From MR, MR (HTRL), MR, (HTRL) to HTL (NPFA), HTL (NPFA), HTL (NPFA)* (* further detailed studies to determine future management of defences and site). Where relevant comments made the document has been amended.</b>				
Comment received			Client Steering Group Response		
<p>SAH102 Northney Farm: I support the principle of MR at Northney Farm but would not wish this to happen until the viability of the farm after MR is ensured. Northney to Mengham: the map shows a small strangely-shaped area of proposed MR west of Verner Common; I wonder if this is economically viable, given the amount of new bunding needed? 5A15: Wickor to Emsworth Yacht Harbour: The first sentence of the summary seems to contradict the ownership map, as the defences north of the security gate near Wickor Point are not owned by the MOD but are private. 5A16 Emsworth Yacht Harbour to Maisemore: Neither this document nor the Portchester/Emsworth Strategy (PEMS) noted the importance of Slipper Pond for protected lagoon fauna. Both say that the walls which act as sea defence/flood protection for properties need to be held, however the integrity of the pond needs to be maintained for the future as well. Therefore the southern bank and penstock must be allowed to be improved, as well as the other surrounding walls. 5A17 Maisemore to Wade: I strongly support carrying out MR at Conigar as soon as possible. Past experience has shown that, when the sea wall has failed, the site develops into a valuable mosaic of brackish and saline habitats, including coastal grazing marsh. This would be an enhancement to the coastal environment, and would also reduce the amount of dog exercising that goes on in the field, to the detriment of waders and wildfowl trying to feed and roost. In front of Nore Barn Woods I would</p>			<p>Many thanks for your consultation feedback. For the proposed MR sites, the defence management intentions of the private landowners have been sought and will determine the final policies for these relevant frontages in Chichester Harbour and Hayling Island. The SMP has collated available information regarding defence and land ownership, which will be reviewed and revised during subsequent defence strategy studies for Hayling Island, Langstone and Chichester Harbours. These studies will investigate various methods for implementing SMP policies and sources of funding. The importance of Emsworth lagoons and ponds has been considered within the environmental appraisal and SEA and AA. With regard to Thorney Island, the SMP team are continuing to work together with the MOD for potential opportunities for environmental enhancement, and will be further investigated through the Defence Strategy studies. The Action Plan has identified the requirements for additional information, further study and/or continued consultation to determine future management of sites.</p>		

not be in favour of adding or repairing hard defences, but would support a scheme to create a protective earth bank designed in such a way that when it eroded it contributed to the intertidal sediment and hence the retention or growth of saltmarsh. 5A20 Farlington Marshes: I support the need for HTL for up to 50 years to allow adequate time for study and alternative habitat. If the study concludes that realignment is the preferred way forward, and consequently that adequate alternative habitat would need to be provided in order to maintain the integrity of the SPA, it would take decades to establish that alternative and ensure that it was functioning properly. Both strategies (SMP and PEMS) should commit to holding the existing line effectively for at least 50 years. 5A04 Cakeham (including East Head) to Ella Nore Lane I welcome the support for the adaptive management system for East Head. 5A06 -08, 10 supports the MR proposals. 5A11 Prinsted: The existing Regulated Tidal Exchange site at Thornham Point should be mentioned and taken into account. 5A12 Prinsted to Stanbury: The outfall from the Wastewater Treatment Works at Thornham is an important element of infrastructure that should be mentioned and considered. The LNR should also be mentioned (as in SA15, which deals with its western side). 5A14 Marker to Wickor: I believe there is scope for realignment at Marker Point itself which would not adversely affect MOD interests, and would like to see this included. This site also has the advantage of not being coastal grazing marsh, so would not reduce the amount of this precious habitat within Chichester Harbour. 5A15: Wickor to Emsworth Yacht Harbour: The first sentence of the summary seems to contradict the ownership map, as the defences north of the security gate near Wickor Point are not owned by the MOD but are private.

Comment relates to	Chichester District Council	Consultee	West Wittering Residents Association	Response No	161
Revisions to SMP	Adaptive Management clarified in final documents. Details added to action plan.				
Comment received			Client Steering Group Response		
<p>5A04 Cakeham (including East Head) to Ella Nore Lane: Please note separate written submission on its way as not enough space for response. We have the following comments on the SMP:</p> <ul style="list-style-type: none"> <li>• The Pagham to East Head CDS should have been accepted at Ministerial level some time ago and thus fully incorporated in the SMP</li> <li>• In the future Localised Defence Strategies should be carried out at the same time as the SMP. Great duplication has resulted in a great cost and time to all parties. This must be avoided in the future.</li> <li>• There is confusion as to what Adaptive Management (5A04) and Management Realignment. No explanation of the differences is given in the SMP guidance notes.</li> <li>• There is much made of Property Owners rights to maintain their defences (4.1 of the guidance notes) and thus protect their land but the resulting compromise of Adaptive Management for 5A04 was entirely due to undue weight being given to the approach of Natural England. The previous agreement to HTL was overturned as a result. Your guidance notes (4.2 -4.6) would suggest that the owners/residents wish to maintain HTL even at their own expense, should be available if landowners/residents so desired. We would support the continuance and therefore of this policy as no Ministerial approval has been given to Adaptive Management.</li> <li>• Policy Unit 5A04 covers the SMP's most sort after recreational area. The ranking for funding is unfairly weighted against such an important asset not only as a commercial are for the Manhood but a protective defence of the village within its boundary.</li> </ul>			<p>Thank you for your comments. The policy recommendations for the frontage between Selsey and East Head have been determined and taken from the approved Pagham to East Head CDS, which is a review of the SMP policies from the first round SMPs for the East Solent and Beachy Head to Selsey Bill SMPs. Due to complexities associated with this frontage it has unfortunately resulted in the completion of the CDS shortly before the development of the North Solent SMP. An SMP is a high level strategic document that recommends coastal flood and erosion risk management policy that will result in economically, socially and environmentally sustainable management of the shoreline over a large region. A Coastal Defence Strategy (CDS) is a more detailed study on a much shorter length of coastline that reviews the SMP policies and assesses how the policies will be implemented. The definition of Adaptive Management will be further clarified in the final plan. The SMP team acknowledge that many of the private landowners in the North Solent SMP area protect their landholding and maintain their defences at their own expense and intend to continue to maintain them over the long-term. The process for the development of the SMP sought this information and we are grateful for the responses received from landowners. Owners of defences have rights to maintain defences and protect property and the SMP policies do not conflict or remove these rights. Improvements or extensions to existing defences will require planning permissions and consents, as is currently the case and is not a new requirement.</p>		

<b>Comment relates to</b>	<b>Chichester District Council</b>	<b>Consultee</b>	<b>West Beach Selsey Residents' Group (WBSRG)</b>	<b>Response No</b>	<b>167</b>
<b>Revisions to SMP</b>	<b>Extra Management unit added to SMP between Hillfield road and West Street</b>				
<b>Comment received</b>			<b>Client Steering Group Response</b>		
<p>We are in full agreement with the consultation response that they have submitted to the North Solent SMP Consultation Draft. We do, however, feel it is important to re-emphasize the point raised by MPSG in their response (item 6) regarding the boundary between NSSMP and the adjoining Beachy Head to Selsey Bill SMP which leaves a section of coast between Hillfield Road and Medmerry Cliffs - Selsey West Beach - not covered by either SMP. It is important that the "missing" section of coastline should be included within the NSSMP, with a clear statement that the policy/strategy recommended for it is the same as the policy stated in the Environment Agency approved "Pagham to East Head Coastal Defence Strategy" of "Hold the Line, sustain". WBSRG have been in contact with Arun District Council, responsible for the Beachy Head to Selsey Bill SMP, and although the EA have already approved the plan they have indicated that reference to PEHCDS, for the Selsey section of their plan, will be included in a "change register" kept by the EA at the next review of the plan. As the NSSMP is still under consultation a positive reference to PEHCDS should/must be included in the final version of the North Solent SMP.</p>			<p>Thank you for your comments. An SMP is a high level strategic document that recommends coastal flood and erosion risk management policy that will result in economically, socially and environmentally sustainable management of the shoreline over a large region. A Coastal Defence Strategy (CDS) is a more detailed study on a much shorter length of coastline that reviews the SMP policies and assesses how the policies will be implemented. The Pagham to East Head Coastal Defence Strategy is a review of the SMP policies from the first round SMPs for the East Solent and Beachy Head to Selsey Bill SMPs. Due to complexities associated with this frontage it has unfortunately resulted in the completion of the CDS shortly before the development of the North Solent SMP. The outcomes, policy unit boundaries and management policies from the Pagham to East Head CDS were incorporated into the North Solent SMP. However, the frontage between Hillfield Road and West Street has been reviewed in light of comments received from the coastal community and will be covered by an additional sub-policy unit.</p>		