

### B10.2.4.3 CONSULTATION FEEDBACK RESULTING IN CHANGES TO SMP POLICY AND / OR DOCUMENTATION – PORTSMOUTH CITY COUNCIL

Comment relates to	Portsmouth city Council	Consultee	Private Individual	Response No	11
Revisions to SMP	5A20 – Policy changed from HTL, HTL*, MR to HTL, HTL*, HTL* Further studies required now before MR can be considered.				
Comment received			Client Steering Group Response		
<p>I think the proposed MR for epoch 3 at Farlington Marshes is a mistake. Clearly all the right steps have been gone through, but they have still come up with the wrong answer. It is difficult to accept that the economics stack up to allow the destruction of a valuable habitat (e.g. coastal grazing marsh) and a valuable public amenity for the sake of a potential MR. Surely the costs of the management and secondary defences, which must then be maintained, cannot be sensible- you might just as well repair what is there already. Besides, why should inter-tidal habitable more valuable in management terms than freshwater or brackish habitats?</p> <p>The EA answer that when the M27 needs defending (as it will eventually), it will be at the expense of the Highways Agency (rather than the EA) is invalid- it is still public money, so the argument that it can be left to another government agency is not very "joined up".</p> <p>It is also no use saying "it's only for 50-100 years"- these things have a habit of getting confirmed over time and I very much doubt a policy of MR will be ever be revised to NAI or even HTL in the future- these are one way policies, other than in very exceptional circumstances (e.g. government decree such as for the Thames Gateway). The economic case for Farlington needs to have the full amenity and SPA designation fully built in!</p>			<p>Thank you for your response. With regard to the long-term management of Farlington Marshes, which are owned by Portsmouth City Council and managed by Hampshire Wildlife Trust, further studies are required to resolve various uncertainties regarding the complex environmental, technical and social-economic issues. In terms of funding sources, the SMP considers whether funding is viable from flood and coastal defence grant aid; subsequent Coastal Defence Strategy studies detail the specific funding requirements and will consider all other public funding sources to ensure best value and use of public funding. With regard to 5A09, the area of privately owned land at potential risk of tidal flooding has not been identified as a potential inter-tidal habitat creation site from the Solent Dynamic Coast Project. Discussions with the private landowner indicate the intention is to continue to maintain the existing defences to protect agricultural and private landholdings and functioning habitat. During the development of the SMP, correspondence from Defence Estates Operations South stated that the MOD will manage the flood defence assets accordingly in order to maintain the required MOD operational capabilities of these facilities. The draft SMP applied this statement to all MOD sites throughout the study area and therefore included sites in Southampton Water, Portsmouth, Langstone and Chichester</p>		

<p>Policies seem inconsistent, with a small MR section flanked by 2 HTL sections (even for no public funding)- where there is no obvious coastal management need for HTL.</p> <p>MOD appears to have been treated differently from other landowners by the assumption that they will defend and may if they wish. The policies should set the strategic policy which may then be over ridden by landowners at their expense if they wish.</p> <p>Excellent public exhibition. Diagrams very clear and well presented.</p>	<p>Harbours. The draft SMP did however, indicate that there maybe potential opportunities for realigning some of the existing MOD-maintained flood defences on Thorney Island in order to create inter-tidal habitat. The requirement for further studies and discussions with landowners and MOD have been identified in the Action Plan.</p>
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Comment relates to	Portsmouth city Council Havant Borough Council	Consultee	Langstone Harbour Board	Response No	182
Revisions to SMP	<p><b>5A20 – Policy changed form HTL, HTL*, MR to HTL, HTL*, HTL* Further studies required now before MR can be considered.</b></p> <p><b>5AH108 – MR removed from epoch 1, further detailed studies are required which may consider regulated tidal exchange at Stoke and West Northney.</b></p>				
Comment received			Client Steering Group Response		
<p>Policy Unit 5A20 Farlington Marshes – OBJECT.</p> <p>This site is a very popular asset visited by locals and visitors from all over the country. Hampshire and Isle of Wight Wildlife Trust manage the site on behalf of Portsmouth City Council.</p> <p>The long-term future of Farlington Marshes has been debated for some time amongst professionals, with officers agreeing that there is currently insufficient information to make a long-term decision due to the uncertainties associated with the environmental, land drainage and recreational impacts. The council (as landowner) need to understand the complex issues associated with this site and we agree, with the SMP, that further detailed studies are required to highlight and address the immediate and long-term implications of applying any SMP policy. The detailed study would also need to recommend the</p>			<p>Thank you for your comments and your objections are noted. With regard to the long-term management of Farlington Marshes, which are owned by Portsmouth City Council and managed by Hampshire Wildlife Trust, further studies are required to resolve various uncertainties regarding the complex environmental, technical and social-economic issues. The need for a Coastal Defence Strategy Study for Hayling Island which also addresses highways, storm water and land drainage issues has been identified in the SMP Action Plan. The Defence Strategy will explore options for environmental enhancement at West Northney and Stoke through such techniques as regulated tidal exchange (i.e. modifications to tidal sluice gates) and realignment of defences at Southmoor. The final policies will therefore reflect the need for further studies to inform the Defence Strategy study.</p>		

<p>appropriate epoch(s) in which to implement any changes in policy and therefore the Board recommend that a precautionary approach is taken by making the following amendments to the final SMP;</p> <ol style="list-style-type: none"><li>1. Change the policy for epochs 2 and 3 to Hold The Line(*) and;</li><li>2. Replace the existing policy caveat (*) text from “further detailed studies required for management of the site” to: “further detailed studies are required which may bring forward Managed Realignment into this epoch.”</li></ol> <p>We feel that this precautionary approach will enable retention of the site until an informed decision can be made on the long-term future of Farlington Marshes.</p> <p>Policy Unit 5AH108 West Lane (Stoke) to Langstone Bridge – OBJECT.</p> <p>The Board support, in principle the proposed Hold the Line policy with localised Managed Realignment at Stoke. However, the Board do not see the benefit of realigning the coastline at West Northney due to it’s proximity to a residential area and the primary road on and off the Island. Due to the potential impact on Langstone Harbour’s environment, we feel that more information is required to justify managed realignment at this site. In the absence of any detail we recommend the SMP should adopt a precautionary approach until enough information is available to make an informed decision.</p> <p>Policy Unit 5A18 Wade Lane to Southmoor Lane – SUPPORT</p> <p>The Board support the proposed Hold the Line policy but highlight that Managed Realignment at Southmoor is not clearly demonstrated in the draft SMP. If managed realignment is proposed at Southmoor we feel that more information is required to justify this decision. Due to the potential impact on Langstone Harbour’s environment, in the absence</p>	
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of any detail we recommend the SMP should adopt a precautionary approach until enough information is available to make an informed decision.	
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**B10.2.4.4 CONSULTATION FEEDBACK RESULTING IN CHANGES TO SMP POLICY  
AND / OR DOCUMENTATION – GOSPORT BOROUGH COUNCIL**

No comments received during consultation resulted in changes to SMP policy or documentation.