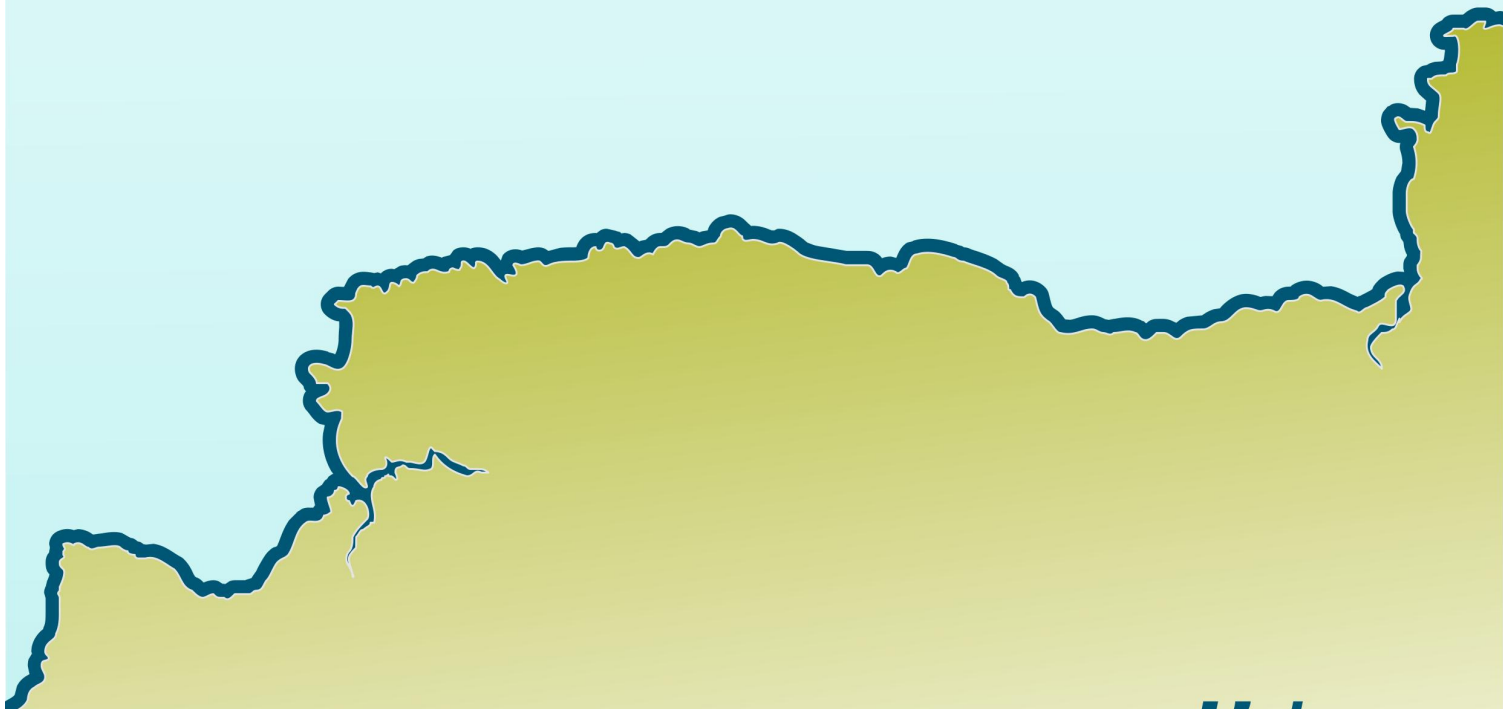


North Devon and Somerset Coastal Advisory Group (NDASCAG)

Shoreline Management Plan Review (SMP2) Hartland Point to Anchor Head

Appendix B – Stakeholder Engagement



The Supporting Appendices

These appendices and the accompanying documents provide all of the information required to support the Shoreline Management Plan. This is to ensure that there is clarity in the decision-making process and that the rationale behind the policies being promoted is both transparent and auditable. The appendices are:

A: SMP Development	This reports the history of development of the SMP, describing more fully the plan and policy decision-making process.
B: Stakeholder Engagement	All communications from the stakeholder process are provided here, together with information arising from the consultation process.
C: Baseline Process Understanding	Includes baseline process report, defence assessment, NAI and WPM assessments and summarises data used in assessments.
D: SEA Environmental Baseline Report (Theme Review)	This report identifies and evaluates the environmental features (human, natural, historical and landscape).
E: Issues & Objectives Evaluation	Provides information on the issues and objectives identified as part of the Plan development, including appraisal of their importance.
F: Initial Policy Appraisal & Scenario Development	Presents the consideration of generic policy options for each frontage, identifying possible acceptable policies, and their combination into 'scenarios' for testing. Also presents the appraisal of impacts upon shoreline evolution and the appraisal of objective achievement.
G: Preferred Policy Scenario Testing	Presents the policy assessment and appraisal of objective achievement towards definition of the Preferred Plan (as presented in the Shoreline Management Plan document).
H: Economic Appraisal and Sensitivity Testing	Presents the economic analysis undertaken in support of the Preferred Plan.
I: Strategic Environmental Assessment (SEA) Report	Presents the various items undertaken in developing the Plan that specifically relate to the requirements of the EU Council Directive 2001/42/EC (the Strategic Environmental Assessment Directive), such that all of this information is readily accessible in one document.
J: Appropriate Assessment Report	Presents the Appropriate Assessment of SMP policies upon European designated sites (SPAs and SACs) as well as Ramsar sites, where policies might have a likely significant effect upon these sites. This is carried out in accordance with the Conservation (Natural Habitats, &c.) Regulations 1994 (the Habitats Regulations).
K: Water Framework Development Report	Presents assessment of potential impacts of SMP policies upon coastal and estuarine water bodies, in accordance with the requirements of EU Council Directive 2000/60/EC (the Water Framework Directive).
L: Metadatabase and Bibliographic database	All supporting information used to develop the SMP is referenced for future examination and retrieval.
M: Action Plan Summary Table	Presents the Action Plan items included in Section 6 of the main SMP document (The Plan) in tabular format for ease of monitoring and reporting action plan progress.

Within each appendix cross-referencing highlights the documents where related appraisals are presented. The broad relationships between the appendices are illustrated below.

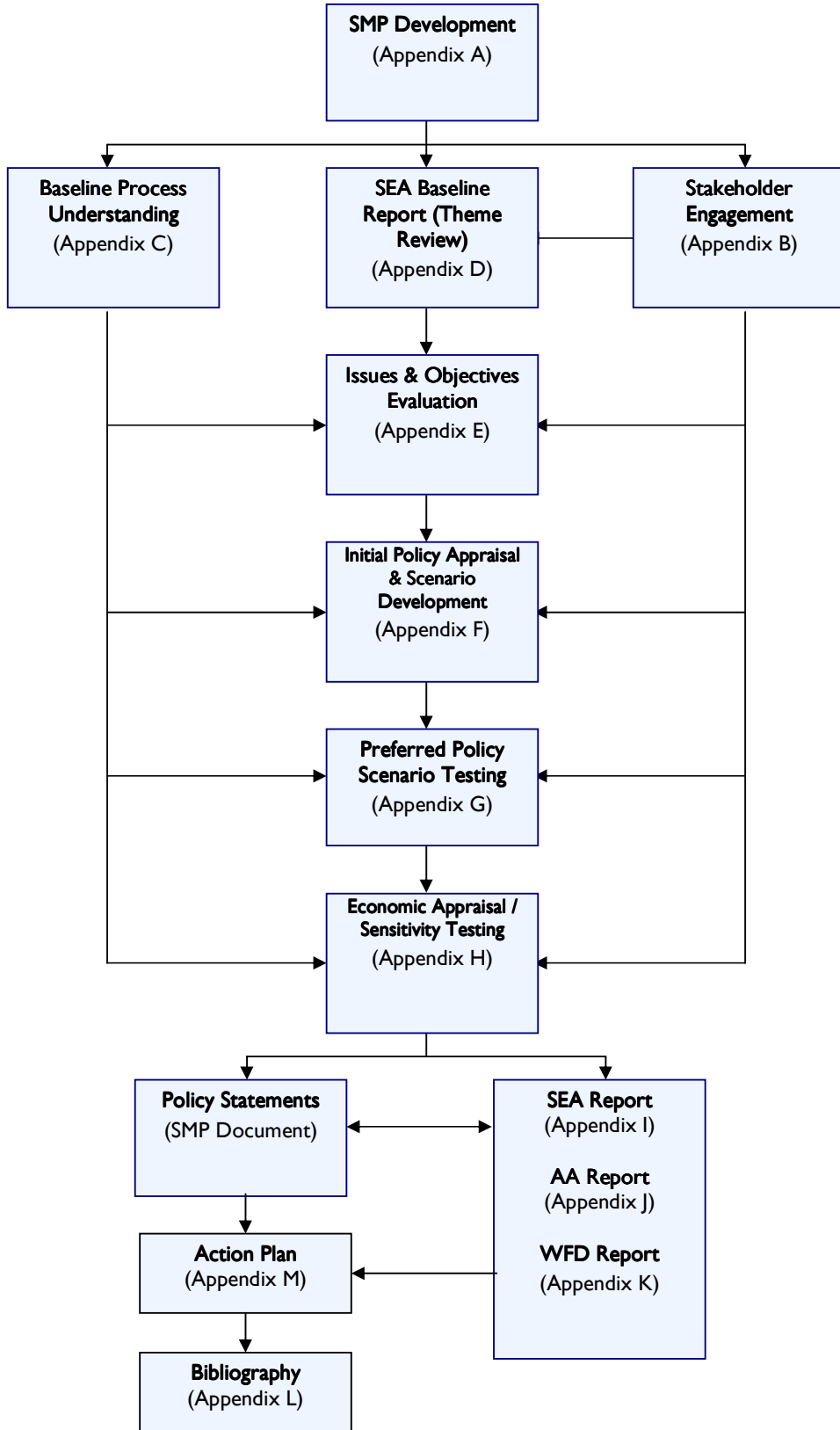


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ANNEXES

B.1 – LIST OF INVITED STAKEHOLDERS

B.2 – STAKEHOLDER COMMENTS DURING INITIAL STAKEHOLDER ENGAGEMENT

B.3 – STAKEHOLDER COMMENTS DURING SMP DEVELOPMENT

B.4 – STAKHOLDER COMMENTS RELATING TO POLICY OPTIONS

B.5 – RESPONSES FROM PUBLIC CONSULTATION AND ACTIONS TAKEN

B.1 Introduction

B.1.1 Stakeholder Engagement Strategy

The stakeholder engagement process is intended to build trust and understanding between all parties involved in the formation of an SMP with the aim of being inclusive, transparent and appropriate in its methods and application.

Three main groups were involved in development of the Hartland Point to Anchor Head Shoreline Management Plan (SMP):

1. Client Steering Group (CSG);
2. Elected Members Forum (EMF); and
3. Key Stakeholders Forum (KSF).
 1. See **Appendix A** for details relating to the **Client Steering Group**, who have taken the lead on the Stakeholder Engagement for this SMP.
 2. The involvement of **Elected Members** in the process of proposal development reflects the "Cabinet" style approach to decision making operating in many local authorities. Politicians are involved from the beginning, thereby reducing the likelihood that the policies will not be approved by the coastal planning authorities. They were involved through a Forum, building trust and understanding between Elected Members, the Client Steering Group and Key Stakeholders. **Regional Flood Defence Committee** members were also invited to attend Elected Member Forums.
 3. The **Key Stakeholder Forum** (KSF) acts as a focal point for discussion and consultation throughout development of the project. The membership of the group provides representation of the primary interests within the study area and includes individuals and organisations who are likely to be affected by the decisions of the project. In the spirit of engaging as fully as possible with stakeholders, all those who registered an interest during the Initial Stakeholder Engagement stage (refer to Section B.2.2) were invited to attend meetings and workshops. These were held at key stages during the review, in order to discuss elements of the SMP as it developed.

The KSF provides direct feedback and information to the Consultant and acts as a focal point for the consultation process. This participation ensures consideration of all issues and objectives during the review. This encourages a partnership approach, whereby responsibilities normally held by the Client Steering Group (CSG) may be shared in order to increase the level of stakeholder ownership of the final decisions.

B.1.2 Summary Table of the Stakeholder Strategy at each stage of SMP Development

Stage of Plan Preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders involved	Method of involvement
Stage 1: SMP Scope	Initial Stakeholder contact	April 2008 to August 2008	<ul style="list-style-type: none"> • Inform interested parties that an SMP is being prepared (on behalf of Defra and coastal operating authorities). • Segregate interested parties into appropriate stakeholder groups. • Request information, e.g. technical reports and photos. • Gather views on issues and objectives relating to the SMP coast. 	<ul style="list-style-type: none"> • Elected Members • Regional Flood Defence Committee • Key stakeholders • Other stakeholders • General public 	Letter, questionnaire and information leaflet (different letters sent to different groups).
Stage 2: Assessments to support policy	Elected Members Forum and Key Stakeholders Forum	October 2008 and January 2009 respectively	<ul style="list-style-type: none"> • Introduce the SMP process. • Request information. • Draft issues and objectives table presented for discussion. • Draft management options presented for discussion. 	<ul style="list-style-type: none"> • Elected Members • Regional Flood Defence Committee • Local MPs • Key Stakeholders • Other stakeholders • General public 	One Elected Members Forum was held and a series of 3 stakeholder events along the SMP coastline. A press release was produced to advertise the stakeholder events. Events included presentations and open discussions.
Stage 3: Policy Development	Key Stakeholders Forum	July 2009	<ul style="list-style-type: none"> • Update on SMP Review to date. • Presentation of flood and erosion risk maps. • Examination of draft policy options in advance of producing policy statements. 	<ul style="list-style-type: none"> • Elected Members • Regional Flood Defence Committee • Key Stakeholders • Other stakeholders 	An Elected Members Forum, planned for June 2009, was cancelled and integrated with the Key Stakeholder Forum to ensure consistency of message provided. Event included presentations, work shops and open discussions.

**Hartland Point to Anchor Head SMP2
Appendix B – Stakeholder Engagement**

Stage of Plan Preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders involved	Method of involvement
	Planning Officers meeting	July 2009	<ul style="list-style-type: none"> • Introduce the SMP process and outline progress to date. • Details provided of how SMPs fit into the wider planning framework. • Examination of draft policy options in advance of producing policy statements. 	<ul style="list-style-type: none"> • Planning Officers 	<p>Environment Agency and Local Authority planners invited to attend meeting as their decision making will be influenced by SMP policies.</p> <p>Event included presentations and open discussions.</p>
Stage 4: Public Examination	Elected Members Forum	October 2009	<ul style="list-style-type: none"> • Launch of draft SMP2. • Elected Members made aware of the draft plan and the public consultation process. • To provide the opportunity for support and objection of the Plan, moving to resolve differences. 	<ul style="list-style-type: none"> • Elected Members • Regional Flood Defence Committee • Local MPs 	<p>Event included presentations, open discussion and exhibition.</p> <p>Distribution of consultation summary leaflet. Draft SMP2 document made available for viewing via www.ndascag.org.</p>
	Public Consultation	October 2009 to January 2010	<ul style="list-style-type: none"> • Stakeholders made aware of the draft plan and the public consultation process. • To provide the opportunity for support and objection of the Plan, moving to resolve differences. 	<ul style="list-style-type: none"> • Key stakeholders • Other stakeholders • General public 	<p>A series of 3 events were held along the SMP coast.</p> <p>Events included presentations, work shops, open discussion and exhibition.</p> <p>Distribution of consultation summary leaflet. Draft SMP2 document made available for viewing via www.ndascag.org.</p>
Stage 5: Finalise SMP		<i>To follow Public Consultation (Target completion: by December 2010)</i>	<ul style="list-style-type: none"> • <i>Review output from public examination and theme the responses.</i> • <i>Produce a Consultation Report on findings.</i> • <i>Meet with CSG to discuss the nature of feedback and amend the plan / policies if necessary.</i> • <i>Meet with EMF to discuss and agree the Final Plan and amend the plan / policies if necessary.</i> • <i>Draft and agree Action Plan.</i> 	<ul style="list-style-type: none"> • <i>Client Steering Group</i> • <i>Elected Members</i> • <i>Regional Flood Defence Committee</i> 	<p><i>Proposed changes to draft plan, Consultation Report and Action Plan reviewed by CSG.</i></p> <p><i>Outcomes relayed to the EMF.</i></p>

Stage of Plan Preparation	Activity	Dates	Purpose of stakeholder involvement	Stakeholders involved	Method of involvement
			<ul style="list-style-type: none"> • Meet with CSG to discuss EMF, the Action Plan and finalisation of the plan. • Update the Main Document and Appendices. • Present Members with the final plan. 		
Stage 6: SMP Dissemination		Target completion: by December 2010	<ul style="list-style-type: none"> • Disseminate to Local Authorities, Natural England, the Environment Agency, Defra and other Coastal Group members. • Update the SMP website: www.ndascag.org • Inform stakeholders of the final plan. 	<ul style="list-style-type: none"> • Elected Members • Regional Flood Defence Committee • Local MPs • Key stakeholders • Other stakeholders • General public 	<p>Hard copies and CD s.</p> <p>Information available to download in PDF format at www.ndascag.org.</p> <p>Summary leaflets disseminated at discretion of Coastal Group members.</p>

B.2 Membership Lists

B.2.1 Elected Members Forum (EMF)

Two meetings were held specifically for Elected Members and Flood Defence Committee members on 20th October 2008 and 9th October 2009. An Elected Members Forum (EMF) planned for 23rd June 2009 was subsequently cancelled and combined with a Key Stakeholder Forum. This allowed us to present the same message to all stakeholders at the same time. The two EMFs were held in Taunton, Somerset – a central location to encourage attendance.

The purpose of these events was to update on the SMP progress and discuss key stages of the SMP development, in advance of engaging with other stakeholders via the Key Stakeholder Forums (KSF). The purpose of the meeting in October 2009 was to officially launch and present the draft SMP2 for public consultation. Details of the engagement with Elected Members are included in Section B.4.

Elected Members and Flood Defence Committee members were also invited to attend KSF events (refer to Section B.2.2).

The Table below shows all attendees at the EMF events. This included Elected Members, Flood Defence Committee members, representatives from the North Devon and Somerset Coastal Advisory Group and representatives from the SMP consultant.

Elected Members and Flood Defence Committee members were also kept informed of progress and key developments throughout the SMP review process via regular Briefing Papers. These are also presented in Section B.4.

Title	First name	Surname	Council	Attended EMF1 (20 th Oct 2008)	Attended EMF2 (9 th Oct 2009)	Attended EMF3 (1 st July 2010)
Cllr	Peter	Bowden	South West RFDC			
Cllr	Ann	Bown	Sedgemoor District Council		Y	
Cllr		Bradford	Sedgemoor District Council			
	Tony	Brown	South West RFDC	Y		
	John	Edwards	South West RFDC	Y		
Cllr	Anne	Fraser	Sedgemoor District Council	Y	Y	
Cllr	Andrew	Gilling	Sedgemoor District Council		Y	
	Clive	Gronow	South West RFDC	Y		
Cllr	Alan	Ham	Somerset County Council	Y		
Cllr		Herbert	Sedgemoor District Council			
Cllr	Neville	Jones	Burnham Town Council		Y	
Cllr	Ken	Maddock	Somerset County Council	Y		
Cllr	Brenda	Maitland-Walker	Somerset County Council		Y	
Cllr	Jim	Mochnac	Somerset County Council	Y		
Cllr	Chris	Morgan	West Somerset District Council	Y		
Cllr	Frances	Nicholson	Somerset County Council		Y	
	Hazel	Prior-Sankey	Wessex RFDC	Y		
Cllr	Margaret	Rogers	Devon County Council	Y		
Cllr	Paul	Tipney	West Somerset District Council	Y		
Cllr	Anthony	Trollope-Bellew	Somerset County Council	Y		
Cllr	Derek	Yeomans	Somerset County Council	Y	Y	
	Andrew	Bell	North Devon's Biosphere Reserve	Y		
	John	Buttivant	Environment Agency	Y	Y	
	Shawn	Corin	Torrige District Council	Y		
	Steve	Dury	Somerset County Council		Y	

Title	First name	Surname	Council	Attended EMF1 (20 th Oct 2008)	Attended EMF2 (9 th Oct 2009)	Attended EMF3 (1 st July 2010)
	Alan	Frampton	Halcrow	Y	Y	
	Adrian	Gardner	Sedgemoor District Council	Y		
	Chris	Hayes	Environment Agency	Y		
	Lyn	Jenkins	Environment Agency	Y		
	Barry	Phillips	Natural England, Somerset	Y	Y	
	Angela	Proctor	Environment Agency	Y	Y	
	Alan	Rafelt	Environment Agency	Y		
	Nick	Reed	Environment Agency		Y	
	Jonathan	Rogers	Halcrow	Y	Y	
	John	Rowlands	Environment Agency	Y		
	Rebecca	Seaman	Somerset County Council	Y		
	Rob	Shuttleworth	Sedgemoor District Council	Y	Y	
	Steve	Stanbridge	Environment Agency	Y		
	Nathan	Sykes	Plymouth Coastal Observatory	Y		
	Ken	Tatem	Environment Agency	Y	Y	
	John	Taylor	Sedgemoor District Council		Y	
	Humphrey	Temperley	Environment Agency	Y	Y	
	Steve	Watts	West Somerset District Council	Y		
	Aidan	Winder	Devon County Council	Y		
	Sarah	Winfield	Somerset County Council	Y		
	David	Wyborn	Exmoor National Park Authority	Y		
	Graham	Wills	Exmoor National Park Authority	Y		

B.2.2 Key Stakeholder Forum (KSF)

The KSF involved individuals who had registered an interest in the preparation of the SMP during the Initial Stakeholder Engagement (refer to Section B.3), including those likely to be affected by the SMP policies. These individuals were invited to participate at key stages in the development of the SMP through attendance at KSFs held in January and July 2009 (refer also to Section B.5).

The table below provides a summary of those stakeholders who attended the various KSF meetings during the development of the SMP. For completeness, it includes members of the North Devon and Somerset Coastal Advisory Group, as well as the SMP consultant. Please note that names of individuals are not published in this public consultation draft and members of the public, for example, local residents affected by the SMP policies, have not been listed. For a full list of stakeholders consulted, refer to Annex B.1.

Organisation	Attended KSF1 Meeting (Jan 2009)	Attended KSF2 Meeting (July 2009)	Attended KSF3 Meeting (Oct 2009)
Barnstaple Town Council			Y
Berrow Parish Council			Y
Blue Anchor Hotel			Y
Bossington Farm		Y	
Braunton Marsh Inspectors			Y
Braunton Marsh Internal Drainage Board	Y		
Brean Parish Council			Y
Burnham and Berrow Golf Club		Y	
Burnham and Highbridge Town Council	Y		Y
Burnham and Somerset Levels Sea Flood Study Group	Y	Y	
Burnham on Sea Community Centre			Y
Burnham Without Parish Council			Y
Cannington Parish Council	Y		

Organisation	Attended KSF1 Meeting (Jan 2009)	Attended KSF2 Meeting (July 2009)	Attended KSF3 Meeting (Oct 2009)
Capture Somerset			Y
Clovelly Estate Company	Y	Y	Y
Colin Brown Environmental Ltd	Y		
Chamber of Trade and Commerce	Y		
Coastal Concern Action Group	Y		
Coastwise	Y	Y	
Coastwise North Devon		Y	Y
Conservation Society			Y
Country Land and Business Association	Y		
Croyde Bay Cottages	Y		
Devon Conservation Forum	Y		
Devon County Council		Y	Y
Devon Sea Fisheries Committee	Y	Y	
Dunster Beach Holidays	Y		Y
EDF Energy	Y		
English Heritage	Y	Y	Y
Environment Agency	Y	Y	Y
Environmental Limited		Y	
Exmoor National Park Authority	Y	Y	Y
Fisherman	Y		
Fremington Army Training Camp	Y		Y
Fremington Parish Council			Y
Green Party			Y
Green World Trust			Y
Halcrow	Y	Y	Y
Heanton Punchardon Parish Council		Y	
Ilfracombe Harbour Master		Y	
Infomap Surveys Ltd	Y		
Landcross Civil Parish			Y
Lyn and Exmoor vision	Y		
Minehead and West Somerset Golf Club	Y		Y
Minehead Conservation Society			Y
National Grid		Y	Y
National Trust	Y	Y	
Natural England	Y	Y	
North Devon AONB			Y
North Devon's Biosphere Reserve		Y	
North Devon Council	Y	Y	Y
North Devon Fishermen's Association	Y		
North Somerset District Council	Y		Y
Northam Burrows 1716 Committee			Y
Northam Town Council	Y		Y
Otter Hampton Parish Council		Y	Y
Parents Concerned About Hinkley			Y
Porlock manor Estate			Y
Porlock Parish Council			Y
Portledge Estate		Y	
Retreat Caravan Park	Y		
Rolle Canal	Y		Y
Royal North Devon Golf Club		Y	Y
Sedgemoor District Council	Y	Y	Y
Sedgemoor Tourism Association	Y		
Somerset County Council	Y		Y
Somerset Drainage Boards Consortium			Y
Somerset Local Authorities Civil Contingencies Unit			Y
Somerset Wildlife Trust (West Somerset Area Group)			Y
South West Coast Path Association	Y		
South West Coastal Groups Chair	Y		
South West RFDC			
South West Tourism			Y
Taw Torridge Estuary Forum	Y	Y	

Organisation	Attended KSF1 Meeting (Jan 2009)	Attended KSF2 Meeting (July 2009)	Attended KSF3 Meeting (Oct 2009)
Taw Torridge Nets	Y		
Torridge CPRE	Y	Y	
Torridge District Council	Y	Y	
Watchet Harbour Advisory Committee			Y
Watchet Harbour Marina	Y	Y	
Watchet Harbour Master	Y		
Wessex RFDC	Y	Y	Y
Wessex Water		Y	Y
West Down Parish Council			Y
West Somerset Council		Y	Y
West Somerset Strategic Partnership			Y
Western Power Distribution	Y		
Williton Parish Council			Y

B.2.3 Planning Officers Meeting

As part of the second round of stakeholder events in July 2009, Planning Officers from Coastal Operating Authorities were invited to attend a meeting tailored to their interests. This included presentations on SMPs within the wider planning framework and an examination of draft policy options in advance of producing policy statements. It is the Planning Officers who's decision making will be influenced by the SMP policies.

Planning Officers were invited to provide comments on the draft SMP2 and their comments have been incorporated into **Annexes B.2 to B.4**.

The list below provides a summary of those Coastal Operating Authorities who were represented at the meeting:

- Devon County Council;
- Environment Agency;
- Exmoor National Park Authority;
- North Devon Council;
- Sedgemoor District Council;
- The National Trust;
- Wessex Water; and
- West Somerset Council.

B.3 Initial Stakeholder Engagement Materials

B.3.1 Introduction

The Initial Stakeholder Engagement ‘pack’, sent out in April 2008, included:

1. **Invitation letter.** Three variations of the invitation letter were produced and sent to the following categories of stakeholders:
 - Key Stakeholders – those that are required to be involved in the SMP process, for example, statutory organisations and those organisations/companies directly affected by coastal defence changes.
 - Other stakeholders – individuals and organisations to whom a formal approach should be made. They are considered to be aware but not be familiar with the SMP process and may be affected by its decisions. This could include individual landowners and small businesses.
 - General public – individuals, for example local residents, that are likely to be affected by the SMP policies.
2. **Information leaflet.** This provided a background to SMPs, detailed the process being undertaken to review the North Devon and Somerset SMP and the importance of stakeholder engagement.
3. **Questionnaire.** This requested basic contact details, interests and concerns with the coastline and the review of the SMP and made a request for any data or information that could be made available.

This ‘pack’ was sent to a large number of organisations, all of whom are listed in **Annex B.1**.

Comments received as part of this Initial Stakeholder Engagement are presented in **Annex B.2**.

B.3.1.1 Key Stakeholders Invitation Letter (Sample)

EXAMPLE LETTER TO GO TO KEY STAKEHOLDERS
(large organisations that are familiar with the SMP process and were probably involved in the first generation of plans)

Recipients Name
Address Line 1
Address Line 2
Address Line 3
Address Line 4

Date:

Stakeholder ref:



North Devon and Somerset
Coastal Authorities Group

www.ndascag.org

Dear.....

Shoreline Management Plan Review – North Devon and Somerset Coastline

The Shoreline Management Plan (SMP) for the North Devon and Somerset coastline is now due for review. This is being led by North Devon Council and the Environment Agency, on behalf of the North Devon and Somerset Coastal Authorities Group (NDASCAG) and will cover the coastline between Hartland Point, Devon and Anchor Head (Weston-super-Mare), Somerset.

The enclosed leaflet provides an overview of what an SMP is and how the review will be undertaken.

The purpose of the Plan, which will cover the next 100 years, will be to assign one of the policies defined by the Department for Environment, Food and Rural Affairs (Defra) to each section of the coast within the plan area. These policies are:

- Hold the existing defence line
- Advance the existing defence line
- Managed realignment – identifying a new line of defence
- No active intervention – a decision not to invest in providing or maintaining defences.

It is essential that the revised plan adequately deals with the issues and concerns of the communities, businesses and organisations having an interest in this part of the coast and that the consultants base their work on the best information available to them. For these reasons it is important that consultation takes place with identifiable stakeholders at the earliest stage of plan preparation.

Cont...

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If you have not already registered as a stakeholder for the review process, I would like to invite you to do so. You can do this by completing the enclosed questionnaire, through which you can indicate your areas of interest, the form and type of information you may hold appropriate to the study of the coastline and what future contact arrangements I should make with your organisation. Alternatively, you can complete this questionnaire quickly and easily online at www.ndascag.org. Additional information regarding the SMP and NDASCAG can also be found on this website. Please note that using your unique stakeholder reference number, quoted at the beginning of this letter, will make it easier to manage your correspondence online and via the post.

I look forward to hearing from you.

Yours sincerely,



Angela Proctor
NDASCAG Technical secretary

Strategic and Development Planning Team
Flood Risk Management
Environment Agency
South West Regional Office
Manley House
Kestrel Way
Exeter
EX2 7LQ

B.3.1.2 Other Stakeholder Invitation Letter (Sample)

EXAMPLE LETTER TO GO TO OTHER STAKEHOLDERS
(other organisations or businesses who may not be familiar with SMPs but to whom a more formal approach should be made)

Recipients Name
Address Line 1
Address Line 2
Address Line 3
Address Line 4

Date:

Stakeholder ref:



North Devon and Somerset
Coastal Authorities Group
www.ndascag.org

Dear

Shoreline Management Plan – North Devon and Somerset Coastline

I am writing to invite you/your organisation to participate in preparing the revised Shoreline Management Plan (SMP) for the coastline between Hartland Point, Devon and Anchor Head (Weston-super-Mare), Somerset.

The South West coastline is heavily influenced by natural and human factors. The enclosed leaflet explains what an SMP is and why they are so important to our coastline.

A key output of SMPs is to identify the main issues of concern relating to erosion, flood risk and management of natural coastal processes. This information will be sought from those with an interest in the coast, be it as residents, businesses or those with a concern for the natural and built heritage. The issues will then be brought together to determine the policies which should be applied to allow society's objectives to be achieved in full acknowledgement of the potential impact on the natural environment and the likely environmental, financial and social cost involved.

The policies to be considered are those defined by the Department for Environment, Food and Rural Affairs (Defra). These are:

- **Hold the existing defence line** - maintain or upgrade the level of protection provided by defences.
- **Advance the existing defence line** - build new defences seaward of the existing line.
- **Managed realignment** - allow retreat of the shoreline, with management to control or limit movement.
- **No active intervention** - a decision not to invest in providing or maintaining defences.

Management of the coastline rests with a number of organisations, principally Local Authorities and the Environment Agency - occasionally principal landowners and coastal industries also have management responsibilities. The North Devon and Somerset Coastal Authorities Group (NDASCAG) is undertaking the review of the SMP that will guide the management of the coast for the next 100 years. In carrying out this work it is important that the needs, concerns and aspirations of those with an interest in the coast, the stakeholders, are taken into account.

Cont...

1

Because of your interest in this coastline, I would appreciate your help in providing any appropriate information which you may hold in order to improve the data on which the plan is prepared. I would like to learn about those issues that you would want to see being addressed in the plan and any other comments which you feel the Coastal Group should be aware of during the preparation of the plan. If you have not already registered as a stakeholder for the review process, I would like to invite you to do so. You can do this by completing and returning the enclosed questionnaire, indicating your area of interest, the form and type of appropriate information you may hold and what future contact arrangement I should make with you. Alternatively, you can complete this questionnaire quickly and easily online at www.ndascag.org. Please note that using your unique stakeholder reference number, quoted at the beginning of this letter, will make it easier to manage your correspondence online and via the post.

I look forward to hearing from you.

Yours sincerely,



Angela Proctor
NDASCAG Technical Secretary

Strategic and Development Planning Team
Flood Risk Management
Environment Agency
South West Regional Office
Manley House
Kestrel Way
Exeter
EX2 7LQ

B.3.1.3 General Public Invitation Letter (Sample)

**EXAMPLE LETTER TO GO TO GENERAL PUBLIC
(individual landowners and small businesses that need to have the SMP
process explained to them)**

Recipients Name
Address Line 1
Address Line 2
Address Line 3
Address Line 4

Date:

Stakeholder ref:



North Devon and Somerset
Coastal Authorities Group

www.ndascag.org

Dear.....

Shoreline Management Plan – North Devon and Somerset Coastline

The Shoreline Management Plan (SMP) for the coast between Hartland Point, Devon and Anchor Head (Weston-super-Mare), Somerset is being reviewed and your participation in the consultation process would be much appreciated.

The responsibility for management of coastal defences against erosion and flooding is shared between the Environment Agency and Coastal Operating Authorities. An SMP is the means by which these organisations determine the best way to look after the coast in a sustainable way for the next 100 years. It is prepared using guidelines set down by the Department for the Environment, Food and Rural Affairs (Defra) which is the Government department having responsibility for setting national policy for defence of the coastline.

The enclosed leaflet outlines what an SMP is and why they are so important for our coastline. Through consultation, the review of the SMP for the North Devon and Somerset coastline will assess the risk from erosion or flooding and how this will affect local communities.

These issues will be compared with what is known about the coastal processes, the economics of maintaining or providing new defences and the need to seek sustainable methods of managing the coast in the future. From this assessment a number of objectives for the coast will be prepared.

Based on these objectives, a preferred management policy for each length of coast will be proposed. The policies, defined by Defra, are:

- **Hold the existing defence line** - maintain or upgrade the level of protection provided by defences.
- **Advance the existing defence line** - build new defences seaward of the existing line.
- **Managed realignment** - allow retreat of the shoreline, with management to control or limit movement.
- **No active intervention** - a decision not to invest in providing or maintaining defences.

Cont...

1

It is important to gauge the response from the community through the review process. It is likely that you will have an interest in the future management of the coast and it is for that reason that I would like to invite you to be a consultee for the plan. I would be grateful if you could complete the enclosed questionnaire, to provide background information and any comments you may have, on issues to be considered by the project team. Alternatively, you can complete the questionnaire quickly and easily online at www.ndascag.org. Please note that using your unique stakeholder reference number, quoted at the beginning of this letter, will make it easier to manage your correspondence online and via the post.

I look forward to hearing from you.


Yours sincerely,



Angela Proctor
NDASCAG Technical Secretary

Strategic and Development Planning Team
Flood Risk Management
Environment Agency
South West Regional Office
Manley House
Kestrel Way
Exeter
EX2 7LQ

B.3.1.4 Background of SMPs: Stakeholder Information Leaflet



Coast Path, Tr Altons Point
County of North Devon, Somerset

THE SOUTH WEST COASTLINE

The coastline of the South West undergoes constant change due to the effects of waves, tidal currents and climate change. Coastal processes such as erosion and flooding are hazards to people, property and infrastructure. Attempts to stop them at a particular location have, in many cases, occurred without acknowledging effects on other locations up and down the coast.

Balancing the desire to protect property and livelihoods and prevent the actual creation of new problems, whilst maintaining the integrity of the natural coast, requires creative management solutions. Difficult decisions have to be made about where and how to protect.


What is a Shoreline Management Plan?

Shoreline Management Plans (SMPs) are a large-scale assessment of the risks associated with coastal processes and help to reduce these risks to people and the developed, historic and natural environment. They form an important element of the Department for Environment, Food and Rural Affairs' (Defra) strategy for flood and coastal erosion risk management and are intended to inform long-term strategic planning.

The objectives of SMPs are to:

- set out risks and identify opportunities and preferred management policies
- set out procedures for monitoring how effective policies are and identify their consequences
- inform others of the risks and associated policies in order to discourage inappropriate development
- meet nature conservation legislation.

The SMP boundaries are based on natural coastal processes relating to the movement of sand and shingle along the coast. Different lengths of coastline will have different management policies, reflecting the natural and built environment.



Hilscombe

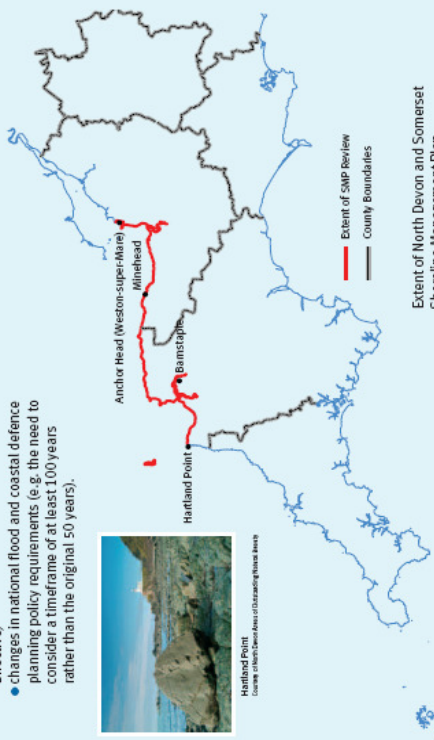
SMPs allow decisions to be taken with confidence, using the best available evidence and effective engagement with local communities to provide a sustainable vision for the coast. They are now due for a review (SMP2), following updated guidance from Defra, to take account of:

- the latest coastal studies and monitoring information
- issues identified by defence planning (i.e. coastal defence strategy plans)
- changes in legislation (e.g. European Habitats Directive)
- changes in national flood and coastal defence planning policy requirements (e.g. the need to consider a timeframe of at least 100 years rather than the original 50 years).


The North Devon and Somerset SMP2

The original SMP for the North Devon and Somerset coastline was completed in June 1998 and stretched from Hartland Point in Devon to Blean Down in Somerset. In accordance with the latest SMP guidance, the eastern boundary of this SMP2 will be extended eastwards from Blean Down to Anchor Head (Weston-super-Mare).

The review will be undertaken by the North Devon and Somerset Coastal Authorities Group (NDAS-CAG), with project management by the Environment Agency. It will be completed in 2010.



Extent of North Devon and Somerset Shoreline Management Plan



Blandford Bay, Dorset. Courtesy of North Devon and Somerset Coastal Authorities Group


How can you help?

In order to produce a plan which meets the needs of the area, we have to ensure the following are achieved:

- full stakeholder and public engagement on issues within the SMP area
- all opinions and views are registered at an early stage
- the plan is based on both current and predicted data
- all parties have the necessary information they require about the SMP review.

For more information or to register as a stakeholder in the consultation process please visit the NDASCAG website at:
www.ndascag.org

Alternatively,
contact the Project Manager Angela Proctor.
Tel: 01392 352409
e-mail: angela.proctor@environment-agency.gov.uk




North Devon and Somerset Coastal Authorities Group

North Devon and Somerset Coastal Authorities Group

Coastal Groups are made up of Operating Authorities, such as District Councils, and other bodies with coastal defence responsibilities. They provide forums for discussion and co-operation and play an important role in the development of SMPs for their area.


The North Devon and Somerset Coastal Authorities Group (NDASCAG) consists of representatives from the following:

- Devon County Council
- Environment Agency
- Environment Agency Regional Flood Defence Committees
- English Heritage
- Exmoor National Park Authority
- National Trust
- Natural England
- North Devon District Council
- North Somerset District Council
- Royal Society for the Protection of Birds
- Sedgemoor District Council
- Somerset County Council
- Torridge District Council
- West Somerset District Council



Blandford Bay, Dorset. Courtesy of North Devon and Somerset Coastal Authorities Group

Managing our coastline for the future



North Devon and Somerset Coastal Authorities Group
www.ndascag.org

This summary leaflet was also made available electronically via the North Devon and Somerset Coastal Advisory Group website: www.ndascag.org.

B.3.1.5 Stakeholders Sample Questionnaire

EXAMPLE STAKEHOLDER QUESTIONNAIRE

Please answer the following questions online at www.ndascag.org, or on this sheet and return to Angela Proctor in the pre-paid SAE, by **Monday 30th June**. Completion of the questionnaire, even if you do not wish to comment on the Shoreline Management Plan, would be appreciated.

- Yes, please keep me informed of Shoreline Management Plan progress No, I do not want to be kept informed of Shoreline Management Plan progress

We would encourage you to complete this form online, entering your stakeholder reference number where prompted – this will assist us with your details and any future correspondence.

Stakeholder reference number: «ID»

PLEASE NOTE: The information that you provide will NOT be available to third parties or used for any other purpose than correspondence on the North Devon and Somerset SMP review.

CONTACT DETAILS *(please amend where necessary)*

1. Name of contact	«Title» «First_Name» «Surname»
2. Name of business or organisation	«Organisation»
3. Position in organisation	«Position»
4. Address	«address_1» «address_2» «address_3» «town» «county» «Postcode»
5. Telephone	«telephone»
6. Fax no.	«fax»
7. Email address	«email»

COMMENTS

8.	Is your business or organisation affected by the risk of coastal flooding or erosion? If so, please give brief details including any significant historic events.
9.	What are the main issues relating to the way in which the coastline is managed and which do you want to see being dealt with in the plan?

Cont...

10. What objectives do you have for the future management of the coastline?
11. Do you have any views on the way in which the existing defences have had an impact on the way in which the coastline has developed?
12. Do you have any views on changes that should be made to the existing coastal defences? What effect do you think this would have?

INFORMATION

Please let me know if you hold information on any of the following aspects. If so, in what format is it held and are you willing to make it available to the Project Team?

Information	Format	Available Y/N
13. A map of your premises, site(s) or showing your area of interest		
14. Local coastal processes		
15. Flooding and erosion events		
16. Design and construction of existing coastal defences		
17. The natural environment and ecology		
18. The built environment, coastal industries and land use		
19. Ports and harbours		
20. Agriculture		
21. Tourism and amenity usage of the coast		
22. Inshore fisheries		

Thank you for your time

B.4 Elected Members Materials

B.4.1 Introduction

Below are a series of documents that were sent to Elected Members and the Wessex and South West Regional Flood Defence Committees (RFDC). Briefing papers were produced when necessary to keep members informed of key developments throughout the SMP review process.

Documents were distributed to Elected Members via Coastal Group members and to RFDCs via the committees secretary.

B.4.1.1 Briefing Papers

North Devon and Somerset Shoreline Management Plan

BRIEFING PAPER – OCTOBER 2007

This briefing paper is intended to inform the North Devon and Somerset Coastal Authorities Group (NDASCAG), elected members, flood defence committee members, etc of progress with the SMP review. It will be updated and distributed as and when necessary.

Background

Shoreline Management Plans (SMPs) are a means for providing a large-scale assessment of the risks associated with coastal processes and presenting a long term policy framework to manage those risks and further sustainable development.

During the preparation of many first round SMPs it became apparent that the quality and extent of information available was considered to be deficient in certain aspects, particularly informing how the coast would evolve. There is now significant new information resulting from strategic studies, coastal monitoring, coastal defence schemes, changes in environmental designations, etc.

Future investment decisions and forward plans need to be based on robust policies for the coast. With the recent updating of climate change scenarios, current SMP policies may no longer be practical or acceptable in the future.

The first generation Bridgwater Bay to Bideford Bay SMP, covering the North Devon and Somerset coastline, was completed in June 1998. In accordance with Defra High Level Targets the SMP is now due for review.

Delivery of the Review

The SMP review is to be undertaken by the NDASCAG. The group consists of the following coastal operating authorities and organisations:

- Torridge District Council
- North Devon District Council
- West Somerset District Council
- Sedgemoor District Council
- North Somerset District Council
- Devon County Council
- Somerset County Council
- Environment Agency
- Defra
- English Heritage
- Exmoor National Park
- National Trust
- Natural England
- RSPB

The SMP will be fully funded through Defra coast protection grant, for which North Devon District Council have made a successful application (approved August 2007). The Environment Agency will project manage the review, with support services from partnering teams. A SMP consultant will be procured to consider the technical aspects of the study and to put forward policy options for consideration.

Review Timescales

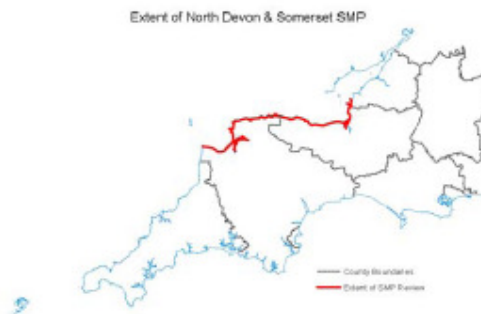
The Defra deadline for SMP reviews is March 2010. The following timescales are anticipated by the NDASCAG:

- **Stage 1:** Scope the SMP, Oct 07 – Feb 08
- **Stage 2:** Detailed Assessments, Mar 08 – Nov 08
- **Stage 3:** Policy Development, Dec 08 – Apr 09
- **Stage 4:** Public Examination, May 09 – June 09
- **Stage 5:** Finalise Plan, July 09 – Aug 09
- **Stage 6:** Plan Dissemination, Sept 09

SMP Boundaries

The first generation SMP extended from **Hartland Point**, Devon to Brean Down, Somerset. The review will include a boundary extension eastward to **Anchor Head**, just north of Brean Down, due to breach potential into Weston Bay.

In accordance with Defra guidelines, the SMP boundaries within estuaries will ensure that there are no gaps with Catchment Flood Management Plans (CFMPs) and in some locations there may be an overlap as, generally, they will extend up to the tidal limit.



How can you help?

You can help the review process by providing us with the following information:

- **List of stakeholders who have an interest in the SMP coastline**
- **List of schemes/studies along the SMP coastline that have been carried out since the first generation SMP, completed 1998**

If you would like to be kept informed of progress by receiving future briefing papers contact Angela Proctor on the details below.

For more information about the NDASCAG and the SMP review visit
www.ndascag.org

Angela Proctor
NDASCAG Technical Secretary
Environment Agency
01392 352409
Angela.Proctor@environment-agency.gov.uk

October 2007

North Devon and Somerset Shoreline Management Plan

BRIEFING PAPER – DECEMBER 2007

This briefing paper has been produced to inform the North Devon and Somerset Coastal Authorities Group (NDASCAG), elected members, flood defence committee members, etc of progress with the SMP2 review and what we intend to do in the near future.

Restructuring of Coastal Groups

It is a DEFRA intention to reduce the number of Coastal Groups in England and Wales from 19 to approximately 6 or 7 by 1st April 2008. It has been suggested that Coastal Groups in the South West should be amalgamated into one. South West Coastal Group chairs met in November and agreed that one large group would be inappropriate, resulting in less engagement. The following two groups have therefore been proposed:

1. Portland Bill, Dorset – Hartland Point, Devon (combine South Devon and Dorset and Cornwall and Isles of Scilly Coastal Groups)
2. Hartland Point, Devon – St Govan's Head (combine North Devon and Somerset, Severn Estuary and Swansea and Carmarthen Bay Coastal Groups)

A formal consultation process will soon be undertaken and a joint NDASCAG response will be submitted. This process will not affect the current round of SMP reviews.

SMP2 Stakeholder engagement

The list of stakeholders who wish to be involved in the North Devon and Somerset SMP2 Review is currently being compiled. This is an ongoing process and we need to continue to encourage potential stakeholders, including organisations and members of the public, to register their interest.

In order to encourage registration of more stakeholders we will run a media campaign in the new year. This may include press releases, newspaper articles and adverts.

We aim to have a thorough list of stakeholders compiled by the end of January 2008, at which point we will send out letters and leaflets to inform them of the SMP2 review process and how they can get involved.

SMP2 consultant

The NDASCAG will procure the main SMP2 consultant through the Environment Agency Strategic Flood Risk Mapping Framework. We intended to start the procurement process in the new year and hope to have a consultant appointed by the end of March 2008.

How can you help?

You can help the SMP2 review process by undertaking the following:

- Register your interest online at the website below
- Encourage others to register their interest
- Inform us of relevant local publications that may be able to run an article about the SMP2 review

For more information about the NDASCAG and the SMP review visit
www.ndascag.org

Angela Proctor
NDASCAG Technical Secretary
Environment Agency
01392 352409
Angela.Proctor@environment-agency.gov.uk

North Devon and Somerset Shoreline Management Plan

BRIEFING PAPER – APRIL 2008

This briefing paper has been produced to inform the North Devon and Somerset Coastal Authorities Group (NDASCAG), Elected Members and Regional Flood Defence Committee Members of progress with the Shoreline Management Plan review (SMP2) and what we intend to do in the near future.

SMP2 Stakeholder Engagement

Accompanying this Briefing Paper you will find an example stakeholder engagement pack, which will be distributed to potential stakeholders identified for the SMP review week commencing 28th April. The pack contains the following:

- SMP leaflet
- 3 example letters (aimed at key stakeholders, other stakeholders and general public)
- Example stakeholder questionnaire
- Example list of stakeholders

To coincide with this mailing, a press release will be arranged to target potential stakeholders that may have been missed.

SMP2 Consultant

We have begun the tendering process to appoint a consultant for the development of the plan. Appointment will be through an Environment Agency consultancy framework. Scoping and tender documents are currently being compiled and we aim to issue these on 9th May. The deadline for tender submission is 6th June and we will have a final decision on which consultant will be appointed, endorsed by the SMP Steering Group, by the end of June.

Restructuring of Coastal Groups

A consultation period for the restructuring of Coastal Groups was run early this year. Within the South West, Coastal Groups will be reduced from 5 to 2, with boundaries as follows:

1. **Portland Bill, Dorset – Hartland Point, Devon** (combines South Devon and Dorset and Cornwall and Isles of Scilly Coastal Groups)
2. **Hartland Point, Devon – St Govan's Head, Wales** (combines North Devon and Somerset, Severn Estuary and Swansea and Carmarthen Bay Coastal Groups)

Implementation of these strategic Coastal Groups commenced from 1st April 2008 and will be effective from October 2008.

For more information about the restructured Coastal Groups visit the Defra website: <http://www.defra.gov.uk/environ/fcd/policy/CoastalGroups.htm>

How can you help?

You can help the SMP2 review process by undertaking the following:

- Requesting additional copies of the SMP leaflet if you are able to distribute them to interested parties

For more information about the NDASCAG and the SMP review visit
www.ndascag.org

Angela Proctor
NDASCAG Technical Secretary
Environment Agency
01392 352409
Angela.Proctor@environment-agency.gov.uk

North Devon and Somerset Shoreline Management Plan

BRIEFING PAPER 4 – AUGUST 2008

This briefing paper has been produced to inform the North Devon and Somerset Coastal Authorities Group (NDASCAG), Elected Members and Regional Flood Defence Committee Members of progress with the Shoreline Management Plan Review (SMP2) and what we intend to do in the near future.

SMP2 Consultant

Halcrow Group Ltd have successfully won the bid for the North Devon and Somerset SMP Review. The contract start date was 1st August 2008, allowing approximately 19 months to deliver the completed SMP by March 2010.

Halcrow are well placed to undertake the SMP Review for numerous reasons, including:

- Their coastal specialists have been at the cutting edge of development of shoreline management planning since the late 1980s.
- They were involved in the production of eleven of the first generation SMPs, including the North Devon and Somerset SMP.
- They were the lead consultant in developing Defra's Guidance for the production of second round SMPs and undertook three pilots to develop and test the draft Guidance.
- They are the appointed consultant for approximately half of the second round SMPs, including the South Devon and Dorset SMP.
- They undertook the Futurecoast project and are currently involved with the National Flood Risk Assessment and National Coastal Erosion Risk Mapping projects, all of which will be used to inform second round SMPs.

Elected Members Forum

Engagement with stakeholders throughout the SMP review process is essential and by now you will have received correspondence introducing you to the concept of SMPs.

We are organising an Elected Members Forum meeting in order to raise awareness of the SMP2 process, which will ultimately lead to the selection of management policies which you will be asked to adopt. This initial meeting will allow the appointed consultant to explain how they intend to deliver the review programme and will provide you with an opportunity to ask questions and feed in any relevant information relating to your stretch of coastline.

Invites for the meeting will be distributed in due course, however, in the mean time please put the following date in your diary:

North Devon & Somerset SMP2 Review – Elected Members Forum Meeting
Monday 20th October 2008
Taunton Rugby Club

For more information about the NDASCAG and the SMP2 review visit
www.ndascag.org

Angela Proctor
NDASCAG Technical Secretary
Environment Agency
01392 352409
Angela.Proctor@environment-agency.gov.uk



North Devon and Somerset Shoreline Management Plan

BRIEFING PAPER 5 – DECEMBER 2008

This briefing paper has been produced to inform the North Devon and Somerset Coastal Advisory Group (NDASCAG), Elected Members and Regional Flood Defence Committee Members of progress with the Shoreline Management Plan Review (SMP2) and what we intend to do in the near future.

SMP2 Stakeholder Events

Engagement with stakeholders throughout the SMP review process is essential, ensuring that the SMP makes informed and sustainable proposals.

Three stakeholder events are being held throughout the SMP area, in order to engage as many stakeholders as possible. The events will provide information on the following:

- An introduction to SMPs.
- Issues and objectives for the North Devon and Somerset coastline.
- Draft management options for discussion.

The following dates and venues have been confirmed:

- **Monday 19th January, 4pm - 6pm, Bideford Town Hall, Devon.**
- **Wednesday 21st January, 4pm - 6pm, Minehead Rugby Club, Somerset.**
- **Thursday 22nd January, 4pm - 6pm, Laburnum House Hotel, Somerset.**

The attached invitation will be sent to all stakeholders that have confirmed they would like to be kept informed of progress with the SMP review. A press release will be organised before the events, in order to target those that have not yet registered as stakeholders.

If you would like to attend one of the events please let me know.

SMP2 Public Consultation

The draft SMP2 will be available for public consultation from September to December 2009. At this time a draft copy will be made available to the Environment Agency Regional Director and the National Review Panel, in preparation for sign-off in March 2010.

Restructuring of Coastal Groups

Defra require the number of Coastal Groups in England and Wales to be reduced and as a consequence the new Bristol Channel Strategic Coastal Group has been formed. This group will have a 'light touch' strategic approach, enabling the existing Coastal Groups to continue their role and maintain their strength during the SMP reviews.

Terms of Reference for the new Strategic Coastal Group have been drafted and will be endorsed by all existing Coastal Groups in the Bristol Channel area. The North Devon and Somerset Coastal Authorities Group has been re-named the North Devon and Somerset Coastal Advisory Group, in order to reflect these changes.

For more information about NDASCAG and the SMP review visit
www.ndascag.org

Angela Proctor
NDASCAG Technical Secretary
Environment Agency
01392 352409
angela.proctor@environment-agency.gov.uk



North Devon and Somerset Shoreline Management Plan

BRIEFING PAPER 6 – JANUARY 2009

This briefing paper has been produced to inform the North Devon and Somerset Coastal Advisory Group (NDASCAG), Elected Members and Regional Flood Defence Committee Members of progress with the Shoreline Management Plan Review (SMP2) and what we intend to do in the near future.

Documents for Consultation

Shoreline Management Plan (SMP) stakeholder meetings held this month were very successful, with a large number of people attending each one.

If you were unable to attend one of these events, the following documents were presented:

1. **Draft Issues and Objectives** – provides details of the features along the coast that we need to consider the potential impacts upon for different possible management options;
2. **Draft Management Options** – identifies possible management options and scenarios for individual sections of coast over the next 100 years. The possible options are defined by Defra and are (1) Hold the Line, (2) No Active Intervention, (3) Managed Realignment and (4) Advance the Line.

We would like feedback on these documents, which are available on the North Devon and Somerset Coastal Advisory Group website at www.ndascag.org.

It would be useful for you to consider the following questions when responding to us:

- Have we missed any issues or objectives along your stretch of coastline?
- Have we made any mistakes with the issues and objectives identified in the draft document?
- Do you agree with the proposed management options for the policy units that have been suggested and if not, why not?
- Do you think we should be looking at alternative policy unit divisions along your stretch of coastline that have not been identified in the draft document?

Feedback forms, also available on the website, should be returned by **Friday 13th February**.

Elected Members Forum

Following the successful Elected Members Forum meeting held in October 2008, a further event will be held in June 2009 to discuss preferred scenario identification for each proposed management unit. Details of this event will be provided nearer the time.

For more information about NDASCAG and the SMP review visit
www.ndascag.org

Angela Proctor
NDASCAG Technical Secretary
Environment Agency
01392 352409
angela.proctor@environment-agency.gov.uk



North Devon and Somerset Shoreline Management Plan

BRIEFING PAPER 7 – APRIL 2009

This briefing paper has been produced to inform the North Devon and Somerset Coastal Advisory Group (NDASCAG), Elected Members and Regional Flood Defence Committee Members of progress with the Shoreline Management Plan Review (SMP2) and what we intend to do in the near future.

Elected Members Forum

Considerable progress is being made with the North Devon and Somerset SMP2. In order to keep you up to date with progress we have planned two events, as detailed below. Official invites will be distributed, however, in the mean time please put these dates in your diary.

Tuesday 23rd June 2009, 2:30pm to 4:30pm
Taunton Racecourse
Examination of proposed policy options to aid refinement of policies

Tuesday 15th September 2009, 2:30pm to 4:30pm
Taunton Rugby Club
Presentation of draft SMP2 prior to release for public consultation (in Autumn 2009)

Key Stakeholder Events

Continued engagement with stakeholders throughout the SMP review process is essential, ensuring that the SMP makes informed and sustainable proposals.

Following the very successful stakeholder events held in January this year, we are now planning a further series of events for key stakeholders. These will cover the following topics:

- Update on SMP Review to date.
- Presentation of flood and erosion risk maps.
- Examination of proposed policy options, in advance of producing policy statements that will be included in the draft SMP for public consultation (Autumn 2009).

The following dates and venues have been confirmed:

- Monday 13th July, 4pm – 6pm, The Oak Tree, Highbridge, Somerset.
- Wednesday 15th July, 4pm – 6pm, Minehead Rugby Club, Somerset.
- Thursday 16th July, 4pm – 6pm, Cedars Lodge Inn, Barnstaple, Devon.

You are welcome to attend any of these events and a copy of the invite, to be sent to stakeholders in due course, will be forwarded to you.

Local Authority Planning Officers meeting

A meeting for Planning Officers has also been organised for **Wednesday 15th July**, prior to the stakeholder event in Minehead. This meeting will be held 1:00pm – 3:30pm to present:

- An introduction to SMPs and an update on progress.
- SMPs within the wider planning framework.
- Proposed policy options in advance of public consultation (Autumn 2009).

For more information about NDASCAG and the SMP review visit
www.ndascag.org

Angela Proctor
NDASCAG Technical Secretary
Environment Agency
01392 352409
angela.proctor@environment-agency.gov.uk



North Devon and Somerset Shoreline Management Plan

BRIEFING PAPER 8 – AUGUST 2009

This briefing paper has been produced to inform the North Devon and Somerset Coastal Advisory Group (NDASCAG), Elected Members and Regional Flood Defence Committee Members of progress with the Shoreline Management Plan Review (SMP2) and what we intend to do in the near future.

Launch of North Devon & Somerset SMP2

The North Devon and Somerset SMP Review is close to reaching the Public Consultation stage and you are invited to attend one or more of the events detailed below. During these events the draft document will be presented and details provided regarding the consultation process.

The three month consultation period will run throughout October, November and December 2009. The draft document will be made available at www.ndascag.org from Friday 9th October.

Elected Members Forum

The draft North Devon and Somerset SMP2 will be launched at this event. Please note the change of meeting date below. The aim of the event is to present the document to you prior to presenting it to all stakeholders, including members of the public, at later dates.

The draft SMP2 document will be available at www.ndascag.org from the launch date. Copies of the document will be available for viewing at this event.

CANCELLED MEETING

Tuesday 15th September 2009
Taunton Rugby Club

RESCHEDULED MEETING

Launch of draft North Devon & Somerset SMP2
Friday 9th October 2009
Taunton Racecourse, Somerset

10:00 – 10:30	Exhibition and refreshments
10:30 – 11:15	Presentation of draft SMP2 and explanation of public consultation
11:15 – 12:30	Open discussion
12:30 – 13:30	Exhibition and lunch

Please contact the project manager, Angela Proctor, if you would like to attend this event, thank you.

Stakeholder Events

A series of events for all stakeholders, including members of the public, are being held during October, as detailed below. These events will be advertised in the press.

Tuesday 13th October
Princess Hall Theatre, Burnham-on-Sea, Somerset
Event focus on coast between Weston-super-Mare and Hinkley Point

Wednesday 14th October
Northfield Hotel, Minehead, Somerset
Event focus on coast between Hinkley Point and Foreland Point

Thursday 15th October
The Cedars Inn, Barnstaple, Devon
Event focus on coast between Foreland Point and Hartland Point

- 15:00 – 15:30 Exhibition and refreshments
- 15:30 – 16:00 Presentation of draft SMP2 and explanation of public consultation
- 16:00 – 17:00 Open discussion and workshops
- 17:00 – 19:30 Drop-in exhibition and refreshments

Please contact the project manager, Angela Proctor, if you would like to attend one of the above events, thank you.

Stearr Peninsula consultation

A further event is being held in conjunction with the Environment Agency Stearr project consultation. This will cover issues specific to the Stearr Peninsula.

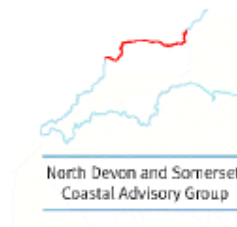
Tuesday 27th October
Otterhampton Village Hall, Somerset

- 14:00 – 19:00 Drop-in exhibition, open to the public

For more information about NDASCAG and the SMP review visit
www.ndascag.org

Angela Proctor
NDASCAG Technical Secretary
Environment Agency
Manley House
Kestrel Way
Exeter
Devon EX2 7LQ

01392 352409
angela.proctor@environment-agency.gov.uk



North Devon and Somerset Shoreline Management Plan

BRIEFING PAPER 9 – NOVEMBER 2009

This briefing paper has been produced to inform the North Devon and Somerset Coastal Advisory Group (NDASCAG), Elected Members and Regional Flood Defence Committee Members of progress with the Shoreline Management Plan Review (SMP2) and what we intend to do in the near future.

Launch of North Devon & Somerset SMP2

The Shoreline Management Plan (SMP) for the coast between Hartland Point, Devon and Anchor Head (Weston-super-Mare), Somerset is now out for public consultation. The SMP was launched at an Elected Members Forum on Friday 9 October 2009 and the consultation will run until Friday 8 January 2010.

The draft document will be available to comment on during this three month consultation period at www.ndascag.org.

If you would like to view a full copy of the draft Plan these are available at the following locations:

- www.ndascag.org
- Environment Agency offices
- Local Authority offices
- Local libraries

We need to ensure that the SMP is making informed and sustainable decisions and input from stakeholders is vital to the process. We held three very successful stakeholder events in October, which members of the public were invited to attend. During these events the draft document was presented and details provided regarding the consultation process.

The proposed management policies are draft and will be finalised at the end of the consultation period, once all stakeholder feedback has been received and considered.

For more information about NDASCAG and the SMP review visit
www.ndascag.org

Angela Proctor
NDASCAG Technical Secretary
Environment Agency
Manley House
Kestrel Way
Exeter
Devon EX2 7LQ

01392 352409
angela.proctor@environment-agency.gov.uk



North Devon and Somerset Shoreline Management Plan

BRIEFING PAPER 10 – MARCH 2010

This briefing paper has been produced to inform the North Devon and Somerset Coastal Advisory Group (NDASCAG), Elected Members and Regional Flood Defence Committee Members of progress with the Shoreline Management Plan Review (SMP2) and what we intend to do in the near future.

Consultation Feedback Report

The three month consultation period for the North Devon and Somerset SMP review ended on 8th January 2010. We had a really good response, receiving feedback from approximately 100 stakeholders.

The consultant, Halcrow Ltd, are currently working through all comments. These will be documented in a Consultation Feedback Report, which will include a response to each comment. Proposed SMP policies, management unit boundaries, etc will be amended where appropriate to reflect comments received.

Proposed changes to the SMP will be agreed by the Client Steering Group, prior to it being presented at an Elected Members Forum. At this point, stakeholders will be informed that the Consultation Feedback Report is available and it will be emphasised that all comments have been considered in finalising the SMP.

Action Plan

Halcrow Ltd are also producing an Action Plan, which will summarise the actions required between now and the next review of the SMP. Actions will include the following:

- o Those required to resolve uncertainties.
- o Those required to deal with the consequences of the plan.
- o Identification of where and when works are expected.
- o Development of a programme of strategies and schemes.

SMP2 adoption and sign-off

The following timescales for adoption and sign-off of the final SMP are proposed:

- o Presentation to Elected Members – late May/early June
- o Endorsement by South West and Wessex RFDCs – mid July
- o Adoption by Coastal Operating Authorities – mid July
- o Sign-off by Environment Agency South West Regional Director and Welsh Assembly Government – Autumn

Specific dates and details of the adoption/sign-off process will be provided in due course.

For more information about NDASCAG and the SMP review visit
www.ndascag.org

Angela Proctor
NDASCAG Technical Secretary
Environment Agency
Manley House
Kestrel Way
Exeter
Devon EX2 7LQ

01392 352409
angela.proctor@environment-agency.gov.uk



B.4.1.2 Elected Members Forum I

The purpose of this event was to introduce the SMP process and put it into context. Information was also provided on the South West Regional Coastal Monitoring Programme, the National Coastal Erosion Risk Mapping project and the National Flood and Coastal Defence Database.

See section B.2.1 for a list of attendees.

Elected Members Forum

Monday 20 October 2008

Taunton Rugby Club



AGENDA

- | | |
|-------|---|
| 09:30 | Arrival and refreshments |
| 10:00 | Welcome
Humphrey Temperley – NDASCAG Chair |
| 10:10 | Shoreline Management Plans - introduction
Angela Proctor – Environment Agency |
| 10:20 | Shoreline Management Plans – Local Authority aspects
Aidan Winder – Devon County Council |
| 10:30 | Shoreline Management Plans – the role of the consultant
Alan Frampton – Halcrow |
| 10:50 | Questions and answers |
| 11:00 | Break |
| 11:20 | South West Regional Coastal Monitoring Programme
Nathan Sykes – Plymouth Coastal Observatory |
| 11:30 | National Coastal Erosion Risk Mapping and the National Flood and Coastal Defence Database (NFCDD)
Jonathan Rogers – Halcrow |
| 11:45 | The North Devon coastline
Andy Bell – Devon County Council |
| 11:55 | The Somerset coastline
Lyn Jenkins – Environment Agency |
| 12:05 | Questions and answers |
| 12:15 | Closing remarks
Humphrey Temperley – NDASCAG Chair |
| 12:20 | Lunch |

B.4.1.3 Elected Members Forum 2

The purpose of this event was to present and launch the draft SMP2 and provide an explanation of the public consultation process.

See section B.2.1 for a list of attendees.



Elected Members Forum

Friday 9 October 2009

Taunton Race Course

AGENDA

10:00	Arrival and refreshments
10:30	Welcome Humphrey Temperley – NDASCAG Chair
10:35	Shoreline Management Plans - introduction Angela Proctor – Environment Agency
10:50	What the SMP means for our coast John Buttivant – Environment Agency
11:05	Open discussion
12:20	Summary Humphrey Temperley – NDASCAG Chair
12:30	Lunch and exhibition
13:30	Close

B.5 Key Stakeholders Materials

B.5.1 Introduction

Below are a series of documents that relate to the Key Stakeholder Forums that were held during the course of developing the SMP2.

See section B.2.2 for a list of attendees at each event.

B.5.1.1 Key Stakeholders Forum I: Invitation Letter

Address



10 December 2008

Stakeholder reference number:

Dear *name*

North Devon and Somerset Shoreline Management Plan – Stakeholder Events

The Shoreline Management Plan (SMP) for the coast between Hartland Point, Devon and Anchor Head (Weston-super-Mare), Somerset is being reviewed and your participation in the consultation process would be much appreciated.

In August 2008 Halcrow Ltd were appointed as the consultant to provide technical advice to the review process, on behalf of the North Devon and Somerset Coastal Advisory Group. During January 2009 we are holding a series of three stakeholder events along the SMP coastline, in order to present their work to date. These events are taking place to provide the following information along the SMP coastline:

- **An introduction to SMPs.**
- **Issues and objectives.**
- **Draft management options for discussion.**

It is vital that we engage as many stakeholders as possible during these events, in order to ensure that the SMP is making informed and sustainable decisions. Your input to the process is important to us and we would like you to attend one of the following events:

- **Monday 19th January, 4pm - 6pm, Bideford Town Hall, Devon.**
- **Wednesday 21st January, 4pm - 6pm, Minehead Rugby Club, Somerset.**
- **Thursday 22nd January, 4pm - 6pm, Laburnum House Hotel, West Huntspill, near Burnham, Somerset.**

These events are open to all stakeholders and we will be encouraging your input – the more information we have the better proposals we can make.

Cont...

1

Events are free for any stakeholder to attend, however, I would be grateful if you could let me know which event you hope to attend, so that I can plan accordingly. Please contact me on the details below.

For further information on the SMP, including venue maps, please visit www.ndascag.org.

I look forward to meeting you at one of our events.

Yours sincerely,



Angela Proctor
On behalf of NDASCAG

01392 352409
angela.proctor@environment-agency.gov.uk

Strategic and Development Planning Team
Flood (& Coastal) Risk Management
Environment Agency
Manley House
Kestrel Way
Exeter
Devon
EX2 7LQ

B.5.1.2 Key Stakeholders Forum 1: Feedback Form

Attendees at these KSF1 events were invited to provide feedback via the following form. Responses are recorded in **Annex B.3**, along with all other comments received from stakeholders during the development of the SMP.

**North Devon and Somerset
Shoreline Management Plan**



Feedback Form

Name:	
Organisation:	
Stakeholder reference:	
Contact details (if not a registered stakeholder):	

Draft Issues & Objectives

Give us your thoughts. Have we covered all issues and objectives in you area of interest?

Draft Management Options

Give us your thoughts. Do you agree in principle with the draft management options in your area or can you make alternative suggestions? Please provide reasons.

Please return completed forms by Friday 13th February to:

Angela Proctor
Environment Agency
Manley House
Kestrel Way
Exeter
Devon EX1 3SL

Alternatively, email your thoughts to angela.proctor@environment-agency.gov.uk

Thank you for your help and involvement.

B.5.1.3 Key Stakeholders Forum 1: Press Release

Press release distributed to relevant local papers prior to events, in order to target potential stakeholders and members of the public missed from initial stakeholder engagement exercise.



news release

January 13, 2009 Ref: 007/09

Your chance to contribute to shoreline management in North Devon and Somerset

People living between Hartland Point in Devon and Anchor Head, near Weston-super-Mare in Somerset, are being asked for their views on how the coastline should be managed over the next 100 years.

A review of the original Shoreline Management Plan, completed in 1998, is being undertaken and this is your chance to get involved in an ongoing consultation process.

During January 2009, the Environment Agency is holding three stakeholder events along the coastline, to show the work that has already been completed as well as consult on future issues and objectives.

In August 2008 Halcrow were appointed as the consultant to provide technical advice to the review process on behalf of the North Devon and Somerset Coastal Advisory Group.

'The group takes the view that it must not commit to 'unsustainable' defence options. In other words, it must be realistic about what kind of defence will be possible in decades to come and not promise what cannot be delivered,' said Coastal Group chairman Humphrey Temperley

'Equally, the plan must be flexible enough to cope with changing circumstances over the next century.'

The SMP considers the Government's latest guidance on local strategic planning, the latest data available, nature conservation legislation, and the implications for property and land use, landscape, historic environment, amenity and recreation.

The consultation events are your chance to help inform the development of the Shoreline Management Plan. They will introduce the background to Shoreline Management Plans, talk through issues and objectives and discuss draft management options. The events will take place on the following dates:

- Monday 19 January, 4pm-6pm at Bideford Town Hall, in Devon.
- Wednesday, 21 January, 4pm-6pm, Minehead Rugby Club, Somerset.
- Thursday, 22 January, 4pm-6pm, Laburnum House Hotel, West Huntspill, near Burnham, Somerset.

'It is vital that we engage as many people as possible who have an interest in this issue during these consultation events, to ensure we are making informed and sustainable decisions,' said Project Manager from the Environment Agency, Angela Proctor.

The events are open to all stakeholders and are free to attend. However, the Environment Agency would like to be informed of anyone who would like to come. For further information on the SMP, including venue maps, please visit www.ndascag.org.

press office 01392 442 008

www.environment-agency.gov.uk

B.5.1.4 Key Stakeholders Forum 2: Invitation Letter

Address



Date

Stakeholder reference number: *number*

Dear *name*

North Devon and Somerset Shoreline Management Plan – Stakeholder Events

The Shoreline Management Plan (SMP) for the coast between Hartland Point, Devon and Anchor Head (Weston-super-Mare), Somerset is being reviewed and your participation in the consultation process is required.

Following the successful stakeholder events held in January this year, we are now planning a further series of events along the SMP coastline. It is vital that we engage with as many stakeholders as possible during these events, in order to ensure that the SMP is making informed and sustainable decisions. Your input to the process is important to us and you are invited to attend one of the following events in July:

- **Monday 13th July – The Oak Tree, Highbridge, Somerset, TA9 4HA**
- **Wednesday 15th July – Minehead Rugby Club, Somerset, TA24 6TR**
- **Thursday 16th July – Cedars Lodge Inn, Barnstaple, Devon, EX31 2HP**

The events are designed to provide information and obtain your views. It should be noted that the SMP will go out to full public consultation in Autumn 2009. The format of each event is as follows:

4:00pm – 5:00pm	Drop-in session and open discussion
5:00pm – 5:30pm	Presentations <ul style="list-style-type: none">• Update on SMP Review to date• Presentation of flood and erosion risk maps• Examination of draft policy options in advance of producing policy statements
5:30pm – 6:00pm	Question and answer session
6:00pm – 7:00pm	Drop-in session and open discussion

Cont...

1

Events are free for stakeholders to attend and you are welcome to join us for the duration or part of an event. I would be grateful if you could contact me on the details below to let me know which one you hope to attend.

For further information on the SMP review please visit www.ndascag.org.

We look forward to seeing you at one of the events.

Yours sincerely,



Angela Proctor
On behalf of NDASCAG

01392 352409
angela.proctor@environment-agency.gov.uk

Strategic and Development Planning Team
Flood (& Coastal) Risk Management
Environment Agency
Manley House
Kestrel Way
Exeter
Devon
EX2 7LQ

B.5.1.5 Key Stakeholders Forum 2: Feedback Form

Attendees at these KSF2 events were invited to provide feedback via the following form. Responses specific to Policy Options are recorded in **Annex B.4**.

North Devon and Somerset SMP2: Feedback Form



In order to set appropriate policy the knowledge & opinions of Stakeholders is essential.

Your views and comments on the proposed preferred policy options will play an important part in the development of the SMP for the North Devon and Somerset coastline and estuaries.

1. Name (and organisation if relevant)
Stakeholder reference (if known):
2. Contact details (address, telephone number, email) <small>(Comments received may be incorporated into the SMP although personal details will not be published but may be kept on file)</small>
3. What is the main reason for your interest in the North Devon and Somerset Shoreline Management Plan? (Please Tick) <input type="checkbox"/> Resident within the Shoreline Management Plan area – postcode:
<input type="checkbox"/> Landowner within the Shoreline Management Plan area – postcode:
<input type="checkbox"/> Represent groups or organisations that are involved (please specify):
<input type="checkbox"/> Other (please specify):
4. Which Policy Unit are you commenting on? (e.g. 7c01- Lundy Landing Beach) (Please complete a separate form for each policy unit.)
5. Do you agree or disagree with the proposed policies presented for this Unit? (See Proposed Policy doc.) In the Short Term period (to 2025) <input type="checkbox"/> Agree <input type="checkbox"/> Disagree In the Medium Term period (to 2055) <input type="checkbox"/> Agree <input type="checkbox"/> Disagree In the Long Term period (to 2105) <input type="checkbox"/> Agree <input type="checkbox"/> Disagree

6. Please tell us your reasons behind the answers to Q5.
(If necessary, please continue on a separate sheet and feel free to attach any supporting information to this form)

If you have any comments on the proposed policy options for the North Devon and Somerset SMP, please complete this form and either return it during one of the stakeholder events, or by post to: Angela Proctor FRM, Environment Agency, South West Region, Manley House, Kestrel Way Exeter Devon EX2 7ZY
Or by email to: angela.proctor@environment-agency.gov.uk by the 31st July 2009.
An electronic version of the form can also be found at www.ndascaq.org which can be submitted direct via email.

Thank you for taking the time to participate in the SMP process. Your comments will be used to refine the draft policy options in developing the Draft SMP documents, which will be subject to full public consultation Autumn 2009.

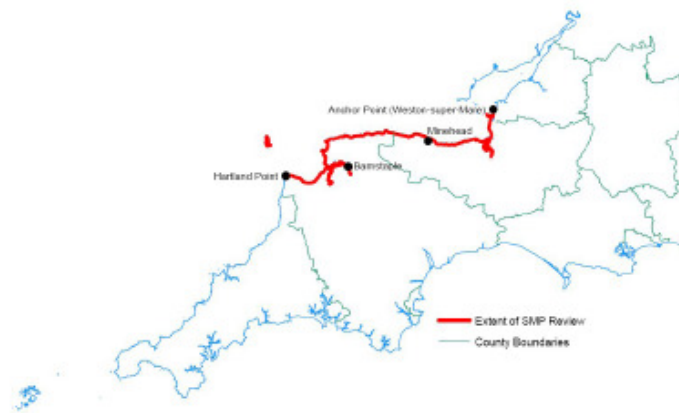
B.5.1.6 Key Stakeholders Forum 2: Planning Officers meeting

As part of the second round of stakeholder events, Planning Officers from Coastal Operating Authorities were invited to attend a meeting tailored to their interests. Comments received from planning officers following this meeting are included in **Annex B.4**.

North Devon and Somerset Shoreline Management Plan

Planning Officers Meeting
Wednesday 15th July 2009
1:00pm – 3:00pm
Minehead Rugby Club, Somerset

The Shoreline Management Plan (SMP) for the coast between Hartland Point, Devon and Anchor Head (Weston-super-Mare), Somerset is currently being reviewed. The review process is being led by the North Devon and Somerset Coastal Advisory Group (NDASCAG).



This meeting is being organised for Planning Officers who's decision making will be influenced by SMP policies. It is vital that we engage as many Planning Officers as possible in the SMP review process, ensuring that it makes informed and sustainable decisions.

The format of the afternoon will be as follows:

- 1:00pm – 2:00pm Presentations and question and answer session
- Introduction to SMPs and update on review progress
 - SMPs within the wider planning framework
 - Examination of draft policy options in advance of producing policy statements
- 2:00pm – 3:00pm Open discussion on specific area issues

Cont...

1

This event is designed to provide information and obtain your views. It should be noted that the draft SMP will go out to full public consultation in Autumn 2009.



Minehead Rugby Club, Somerset, TA24 6TR

Please contact Angela Proctor on the details below to confirm your attendance at the event.

For additional information regarding the SMP review and the NDASCAG visit www.ndascag.org.

Angela Proctor
NDASCAG Technical secretary
Strategic and Development Planning Team
Flood & Coastal Risk Management
Environment Agency
Manley House
Kestrel Way
Exeter
Devon EX2 7LQ

Angela.Proctor@environment-agency.gov.uk
01392 352409



North Devon and Somerset
Coastal Advisory Group

B.5.1.7 Key Stakeholders Forum 3: Invitation Letter



16 September 2009

Dear Stakeholder

North Devon and Somerset Shoreline Management Plan – Consultation Events

The Shoreline Management Plan (SMP) for the coast between Hartland Point, Devon and Anchor Head (Weston-super-Mare), Somerset will be out for a three month public consultation between 9 October 2009 and 8 January 2010.

A series of stakeholder events along the SMP coastline are being held, in order to present the draft SMP. Your input to the consultation process is important to us to ensure the success of the Plan. You are invited to attend one of the following events:

Tuesday 13 October
Princess Hall Theatre, Burnham-on-Sea, Somerset, TA8 1EH
Event focus on coast between Hinkley Point and Weston-super-Mare

Wednesday 14 October
Northfield Hotel, Minehead, Somerset, TA24 5PU
Event focus on coast between Foreland Point and Hinkley Point

Thursday 15 October
The Cedars Inn, Barnstaple, Devon, EX31 2HE
Event focus on coast between Hartland Point and Foreland Point

It is vital that we engage with as many stakeholders as possible during these events, to ensure that the SMP is making informed and sustainable decisions. The format of each event is as follows:

15:00 – 15:30	Exhibition and refreshments
15:30 – 16:00	Presentation of draft SMP2 and explanation of public consultation
16:00 – 17:00	Open discussion and workshops
17:00 – 19:30	Drop-in exhibition and refreshments.

In addition, a consultation event specific to the Steart Peninsula is being run in conjunction with the Environment Agency Steart Coastal Management Project public consultation. Details of this event are as follows:

Tuesday 27 October
Otterhampton Village Hall, Comwich, Somerset TA5 2QZ
Drop-in exhibition between 14:30 and 19:30

Cont...

1

All events are free to attend and you are welcome to join us for the duration or part of an event. I would be grateful if you could contact me on the details below to let me know which event you hope to attend.

Copies of the draft SMP will be made available for viewing at all consultation events. Due to the size of the document copies will not be available to take away. However, a consultation summary leaflet will be available. The draft SMP will be available to download from 9 October 2009 at www.ndascag.org. Alternatively, copies will be available for viewing at your local council office, Environment Agency office or library. Please contact me on the details below to find out where your nearest copy can be viewed.

For further information on the SMP review, including location maps for the consultation events, please visit www.ndascag.org.

We look forward to seeing.

Yours sincerely,



Angela Proctor
On behalf of NDASCAG

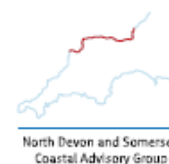
01392 352409
angela.proctor@environment-agency.gov.uk

Flood (& Coastal) Risk Management
Environment Agency
Manley House
Kestrel Way
Exeter
Devon
EX2 7LQ

B.5.1.8 Key Stakeholder Forum 3: Feedback Form

Attendees at these KSF3 events were invited to provide feedback via the following form. Responses are to be recorded in a consultation report that will be produced following the 3 month public consultation period that ends on Friday 8th January 2010.

North Devon and Somerset SMP Consultation Response Form



Your views and comments will play an important part in the development of the Shoreline Management Plan (SMP) for the North Devon and Somerset coastline and estuaries.

A copy of the draft SMP can be viewed online at www.ndascag.org, or at your local library, council office or Environment Agency office.

The deadline for comments is Friday 8th January 2010.

1. Name (and organisation if relevant)

2. Stakeholder reference (if known)

3. Contact details (address, telephone number, email)

(Your comments will be kept on file and may be incorporated into the SMP, however, personal details will not be published)

4. What is the main reason for your interest in the North Devon and Somerset Shoreline Management Plan? (Please tick)

Resident within the Shoreline Management Plan area – postcode:

Landowner within the Shoreline Management Plan area – postcode:

Represent groups or organisations that are involved (please specify):

Other (please specify):

5. Which Policy Unit are you commenting on? (e.g. 7c01- Lundy Landing Beach) (Please complete a separate form for each policy unit.)

6. Do you agree or disagree with the proposed policies presented for this Unit? (See Proposed Policy doc.)

In the Short Term (to 2025) Agree Disagree

In the Medium Term (to 2055) Agree Disagree

In the Long Term (to 2105) Agree Disagree

7. Please tell us your reasons behind the answers to Q6. (If necessary, please continue on a separate sheet and attach any supporting information that you think may help)

8. How useful have you found the draft SMP, supporting documents and materials presented as part of this consultation?

	Public Exhibition	SDADCAG website
5 (very helpful)	<input type="checkbox"/>	<input type="checkbox"/>
4	<input type="checkbox"/>	<input type="checkbox"/>
3	<input type="checkbox"/>	<input type="checkbox"/>
2	<input type="checkbox"/>	<input type="checkbox"/>
1 (not helpful at all)	<input type="checkbox"/>	<input type="checkbox"/>

Any other comments:

9. Are you happy for your contact details to be used to keep you informed of further progress on this SMP and for future similar coastal management initiatives?

Yes No

Please return this form during one of the stakeholder events, or by post to:
Angela Proctor, FCRM, Environment Agency, Manley House, Kestrel Way, Exeter, Devon, EX2 7LQ.

An electronic version of the form can also be completed online at www.ndascag.org, or downloaded and returned via email to angela.proctor@environment-agency.gov.uk.

Deadline for comments – Friday 8th January 2010

Thank you for taking the time to participate in the SMP consultation process

B.5.1.9 Key Stakeholders Forum 3: Press Release

Press release distributed to relevant local papers prior to events, in order to target potential stakeholders and members of the public missed from previous rounds of consultation.



news release

8th October 2009

Your chance to help with coastal planning in North Devon and Somerset

People living between Hartland Point in Devon and Anchor Head, near Weston-super-Mare in Somerset, are being asked for their views on how this stretch of coastline and its estuaries should be managed.

A series of events are being held to present the draft North Devon and Somerset Shoreline Management Plan (SMP), which considers flood and erosion risk management. If you live on or near this stretch of coastline, or have a keen interest in it, then your views are important to us. You are invited to attend one of the events below, which will explain the SMP and how you can help.

- Tuesday 13 October, Princess Hall Theatre, Burnham-on-Sea, Somerset, for the coast and estuaries between Hinkley Point and Weston-super-Mare.
- Wednesday 14 October, Northfield Hotel, Minehead, Somerset, for the coast between Foreland Point and Hinkley Point.
- Thursday 15 October, The Cedars Inn, Barnstaple, Devon, for the coast and estuaries between Hartland Point and Foreland Point.

Each event will include formal presentations and discussions between 3pm and 5pm and an open exhibition, which anyone is welcome to visit, between 5pm and 7:30pm.

A further event is being held in conjunction with the Environment Agency Steart project on Tuesday 27 October, at Otterhampton Village Hall, Somerset. This is an open exhibition, between 2:30pm and 7:30pm, which will cover issues specific to the Steart Peninsula.

'A Shoreline Management Plan provides an assessment of the risks to people and the developed, historic and natural environment, resulting from the evolution of the coast and estuaries,' explained Project Manager Angela Proctor from the Environment Agency.

'It is vital that we engage as many people as possible who have an interest in this issue during these consultation events, to ensure we are making informed and sustainable decisions.'

'Coastal erosion is nothing new - communities have suffered its effects throughout history and it will go on happening. We need to look now at how we can cope with it over the next hundred years, given what we know about the resources that will be available and how the coast will change,' said Coastal Group chairman Humphrey Temperley.

The events are open to all stakeholders and are free to attend. For further information on the SMP, including a copy of the draft document, please visit www.ndasqa.org. Copies of the document will also be available for viewing at your local library, council office or Environment Agency office.

The three month public consultation for North Devon and Somerset SMP, launched on 9 October 2009, will run through until 8 January 2010.

Ends

press office 01392 442 008

www.environment-agency.gov.uk

B.6 Consultation Report

B.6.1 Introduction

Consultation with stakeholders (i.e. Client Steering Group, Elected Members, and other Stakeholders) has occurred throughout the development of the North Devon and Somerset Shoreline Management Plan (SMP). Stakeholder membership lists and the full programme of stakeholder engagement can be found in Sections B.2 to B.5 of this Appendix.

The Consultation Report describes the consultation process undertaken to inform the public of the SMP and to give them an opportunity to comment on the SMP policies. The report outlines the approach to public consultation and feedback from this process.

Public Consultation took place between 9th October 2009 and 8th January 2010.

B.6.2 Public Consultation Methodology

The public consultation methodology, materials and dates were agreed at the CSG meeting held on 18th June 2009.

Approaches adopted are discussed below and include:

- use of the North Devon and Somerset Coastal Advisory Group website;
- news release;
- letters to all those registered on the stakeholder database;
- summary leaflets;
- posters in libraries and on Parish Council notice boards;
- exhibition boards;
- hard copies of the SMP documents;
- CD-ROMs of the SMP documents;
- consultation response forms; and
- public exhibitions and stakeholder meetings.

B.6.2.1 Website

A page on the website of the North Devon and Somerset Coastal Advisory Group (www.ndascag.org) was devoted to the public consultation of the Shoreline Management Plan. Coast and Countryside Projects Ltd acted as administrators for this. The full consultation document, including all appendices and maps, was available in electronic format on the website. The Environment Agency produced a consultation response form which was available to download or complete online.

B.6.2.2 News Release

The Environment Agency External Relations Team produced and distributed a News Release on behalf of the Client Steering Group. This release was taken up by the following publications:

- Bridgwater Mercury
- Bridgwater Times
- Burnham and Highbridge Weekly News
- Clevedon Mercury
- Express and Echo
- Somerset Country Gazette
- West Somerset Free Press

- Western Daily Press
- Western Gazette
- Weston Mercury

A copy of the news release is provided below.



news release

8th October 2009

Your chance to help with coastal planning in North Devon and Somerset

People living between Hartland Point in Devon and Anchor Head, near Weston-super-Mare in Somerset, are being asked for their views on how this stretch of coastline and its estuaries should be managed.

A series of events are being held to present the draft North Devon and Somerset Shoreline Management Plan (SMP), which considers flood and erosion risk management. If you live on or near this stretch of coastline, or have a keen interest in it, then your views are important to us. You are invited to attend one of the events below, which will explain the SMP and how you can help.

- Tuesday 13 October, Princess Hall Theatre, Burnham-on-Sea, Somerset, for the coast and estuaries between Hinkley Point and Weston-super-Mare.
- Wednesday 14 October, Northfield Hotel, Minehead, Somerset, for the coast between Foreland Point and Hinkley Point.
- Thursday 15 October, The Cedars Inn, Barnstaple, Devon, for the coast and estuaries between Hartland Point and Foreland Point.

Each event will include formal presentations and discussions between 3pm and 5pm and an open exhibition, which anyone is welcome to visit, between 5pm and 7:30pm.

A further event is being held in conjunction with the Environment Agency Steart project on Tuesday 27 October, at Otterhampton Village Hall, Somerset. This is an open exhibition, between 2.30pm and 7:30pm, which will cover issues specific to the Steart Peninsula.

'A Shoreline Management Plan provides an assessment of the risks to people and the developed, historic and natural environment, resulting from the evolution of the coast and estuaries,' explained Project Manager Angela Proctor from the Environment Agency.

'It is vital that we engage as many people as possible who have an interest in this issue during these consultation events, to ensure we are making informed and sustainable decisions.'

'Coastal erosion is nothing new - communities have suffered its effects throughout history and it will go on happening. We need to look now at how we can cope with it over the next hundred years, given what we know about the resources that will be available and how the coast will change,' said Coastal Group chairman Humphrey Temperley.

The events are open to all stakeholders and are free to attend. For further information on the SMP, including a copy of the draft document, please visit www.ndascaq.org. Copies of the document will also be available for viewing at your local library, council office or Environment Agency office.

The three month public consultation for North Devon and Somerset SMP, launched on 9 October 2009, will run through until 8 January 2010.

Ends

press office 01392 442 008

www.environment-agency.gov.uk

B.6.2.3 Letters to all registered stakeholders

A standard letter was drafted by the Environment Agency and sent out to all stakeholders who had registered with the SMP over the course of its development. Consultation response forms and consultation summary leaflets were included with the letter. This material promoted the shoreline management plan, highlighted the start of consultation, provided key management option information and invited stakeholders to meetings.

A copy of the stakeholder letter is provided below.

A Briefing Paper was also sent to Elected Members and Regional Flood Defence Committee members. This can be viewed, along with previous Briefing Papers, in section B.4.1.1.



16 September 2009

Dear Stakeholder

North Devon and Somerset Shoreline Management Plan – Consultation Events

The Shoreline Management Plan (SMP) for the coast between Hartland Point, Devon and Anchor Head (Weston-super-Mare), Somerset will be out for a three month public consultation between 9 October 2009 and 8 January 2010.

A series of stakeholder events along the SMP coastline are being held, in order to present the draft SMP. Your input to the consultation process is important to us to ensure the success of the Plan. You are invited to attend one of the following events:

Tuesday 13 October
Princess Hall Theatre, Burnham-on-Sea, Somerset, TA8 1EH
Event focus on coast between Hinkley Point and Weston-super-Mare

Wednesday 14 October
Northfield Hotel, Minehead, Somerset, TA24 5PU
Event focus on coast between Foreland Point and Hinkley Point

Thursday 15 October
The Cedars Inn, Barnstaple, Devon, EX31 2HE
Event focus on coast between Hartland Point and Foreland Point

It is vital that we engage with as many stakeholders as possible during these events, to ensure that the SMP is making informed and sustainable decisions. The format of each event is as follows:

15:00 – 15:30	Exhibition and refreshments
15:30 – 16:00	Presentation of draft SMP2 and explanation of public consultation
16:00 – 17:00	Open discussion and workshops
17:00 – 19:30	Drop-in exhibition and refreshments.

In addition, a consultation event specific to the Steart Peninsula is being run in conjunction with the Environment Agency Steart Coastal Management Project public consultation. Details of this event are as follows:

Tuesday 27 October
Otterhampton Village Hall, Combech, Somerset TA5 2QZ
Drop-in exhibition between 14:30 and 19:30

Cont...

1

All events are free to attend and you are welcome to join us for the duration or part of an event. I would be grateful if you could contact me on the details below to let me know which event you hope to attend.

Copies of the draft SMP will be made available for viewing at all consultation events. Due to the size of the document copies will not be available to take away. However, a consultation summary leaflet will be available. The draft SMP will be available to download from 9 October 2009 at www.ndascag.org. Alternatively, copies will be available for viewing at your local council office, Environment Agency office or library. Please contact me on the details below to find out where your nearest copy can be viewed.

For further information on the SMP review, including location maps for the consultation events, please visit www.ndascag.org.

We look forward to seeing.

Yours sincerely,



Angela Proctor
On behalf of NDASCAG

01392 352409
angela.proctor@environment-agency.gov.uk

Flood (& Coastal) Risk Management
Environment Agency
Manley House
Kestrel Way
Exeter
Devon
EX2 7LQ

B.6.2.4 Summary leaflets

A folded summary leaflet was produced in colour to cover the North Devon and Somerset SMP. The leaflet was developed by Halcrow and the Environment Agency. The CSG reviewed and agreed the draft text and format before the leaflet was finalised. Rather than dealing with specific policies for each section of coast, the leaflet outlined broad aims for large sections of coast and the key implications and challenges that these could bring to local communities and the environment.

Approximately 5000 copies of the leaflet were distributed to the CSG and posted to stakeholders. Leaflets were placed in Local Authority offices, Environment Agency offices and local libraries.

A copy of the leaflet is provided below.

North Devon & Somerset
Shoreline Management Plan Review



Our Charitable Constituents
The committee is undergoing constant change from the effects of waves, tidal currents and the changing nature of the coastline. The degree of exposure of coast and the underlying geology. These changes usually take the form of erosion, which is a natural process. The ongoing commitment of the public to help the coastline is a key factor in the success of the Hartland Point to Anchor Head SMP.

Another reference to the development of the coastline has been human intervention, particularly in the form of sea walls and other coastal defences. With limited understanding of the consequences of the coast and the pressure for more housing in very limited coastal areas, the impact of human intervention has been a constant factor in the development of the coastline.



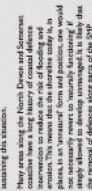
Hartland Point to Anchor Head, including Lundy
This stretch of coastline has a rich diversity in its geology, topography and landscape. The coastline includes the wide open flood plain of the Somerset Levels, large urban areas such as Barnstaple and Exmouth, and the rugged and scenic coastline between Exmouth and Barnstaple. The coastline is also a mix of natural and built-up areas, and the presence of the coast has a great diversity and a certain economy of its own importance.

What is a Shoreline Management Plan?
A Shoreline Management Plan (SMP) provides an objective, long-term assessment of the risks to the coastline and the environment, resulting from the erosion of the coast and the impact of sea level rise. It provides a framework for the development of coastal defences and other measures to manage the risks to the coastline and the environment. The SMP also provides a framework for the development of coastal defences and other measures to manage the risks to the coastline and the environment.



The SMP is a non-statutory policy document for the coastline. It provides a framework for the development of coastal defences and other measures to manage the risks to the coastline and the environment. The SMP also provides a framework for the development of coastal defences and other measures to manage the risks to the coastline and the environment.

Sustainable Management
One of the main objectives of the SMP is to develop a sustainable management plan for the coastline. This involves identifying the risks to the coastline and the environment, and developing a plan to manage these risks. The plan should take account of the needs of the community, the environment, and the economy. The plan should also take account of the need to protect the coastline and the environment for future generations.



The consequences of the coast, the erosion of the coastline, and the impact of sea level rise, are a major concern for the community. The SMP provides a framework for the development of coastal defences and other measures to manage the risks to the coastline and the environment. The SMP also provides a framework for the development of coastal defences and other measures to manage the risks to the coastline and the environment.

Background to the North Devon and Somerset SMP
In 1998 and 2000, the original Shoreline Management Plan (SMP) was developed for the coastline. This was a joint effort by the North Devon and Somerset Councils, the Environment Agency, and the local community. The SMP provided a framework for the development of coastal defences and other measures to manage the risks to the coastline and the environment. The SMP also provided a framework for the development of coastal defences and other measures to manage the risks to the coastline and the environment.



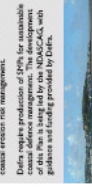
The SMP Review
Recognising the need for review of the original SMP, the North Devon and Somerset Councils, the Environment Agency, and the local community have undertaken a comprehensive review of the SMP. This review has identified a number of key issues that need to be addressed in the new SMP. These issues include the need to take account of the latest scientific research, the need to take account of the needs of the community, the environment, and the economy, and the need to take account of the need to protect the coastline and the environment for future generations.

The Policy Appraisal Process
The 100 year appraisal time frame allows us to look beyond the immediate life time of coastal defence. It allows us to consider the long term implications of the different options. This is an important aspect of coastal management. The appraisal process involves a number of steps, including the identification of the risks to the coastline and the environment, the identification of the different options, and the appraisal of these options. The appraisal process also involves the identification of the key issues that need to be addressed in the new SMP.



An overview of the recommended policies for each of the different sections of the coast is provided in the SMP. The policies are based on the results of the appraisal process. The policies are designed to manage the risks to the coastline and the environment, and to protect the coastline and the environment for future generations. The policies also take account of the needs of the community, the environment, and the economy.

The North Devon and Somerset Coastal Advisory Group
The North Devon and Somerset Coastal Advisory Group (NDSCAG) is a joint effort by the North Devon and Somerset Councils, the Environment Agency, and the local community. The NDSCAG provides a framework for the development of coastal defences and other measures to manage the risks to the coastline and the environment. The NDSCAG also provides a framework for the development of coastal defences and other measures to manage the risks to the coastline and the environment.



Stakeholder Engagement
Greater involvement of stakeholders in the appraisal process is one of the key changes from the first SMP. This involves the identification of the key stakeholders, the identification of the key issues that need to be addressed, and the development of a plan to manage these issues. The plan should take account of the needs of the community, the environment, and the economy, and the need to protect the coastline and the environment for future generations.

What Happens Next?
The NDSCAG will be asked to review the response to the consultation. The NDSCAG will also be asked to develop a plan to manage the risks to the coastline and the environment. The plan should take account of the needs of the community, the environment, and the economy, and the need to protect the coastline and the environment for future generations.



Comments will be considered before formal adoption of the SMP must be received by the North Devon and Somerset Councils. The SMP will be adopted by the North Devon and Somerset Councils in early 2015. The SMP will be implemented by the North Devon and Somerset Councils in early 2015. The SMP will be implemented by the North Devon and Somerset Councils in early 2015.



B.6.2.5 Posters

Bespoke posters were produced and distributed to local Parish Councils and libraries, to be put on notice boards. The aim of the posters was to try and encourage a wider audience to attend each consultation event.

An example poster is provided below.



Shoreline Management Plan for North Devon and Somerset

**Come and find out about the future
of your coastline and estuaries
between Foreland Point and Hinkley Point**

Wednesday 14 October

**3pm - 5pm Formal presentations
5pm - 7.30pm Drop in exhibition**

Northfield Hotel, Minehead



**All welcome to attend
Free of charge**

B.6.2.6 Exhibition boards

A series of 14 exhibition boards were prepared by Halcrow and the Environment Agency. These were reviewed and agreed by the CSG. The boards contained information outlining what an SMP is and why it is needed, how the SMP has been developed, the 4 policy options available, maps showing where individual policy units are located along the SMP frontage, where further information can be found and how feedback can be given.

B.6.2.7 Hard and CD-ROM copies of the Draft SMP Document

40 printed versions of the consultation document were produced. These were distributed among the members of the North Devon and Somerset Coastal Advisory Group and made available to other stakeholders and members of the public at Local Authority offices, Environment Agency offices and local libraries.

Due to the size of the main consultation document (about 245 pages) it was decided that the most appropriate way of providing the supporting information in the various appendices was to include a CD-ROM with the draft document. The CD-ROM also included an electronic version of the main document, which was similar in format to the version made available via the North Devon and Somerset Coastal Advisory Group website.

B.6.2.8 Public exhibitions and stakeholder meetings

A series of 3 public exhibitions were held in October 2009 to publicise the SMP consultation. These events allowed stakeholders and members of the public to ask questions and find out more information about the SMP and the draft policies. Public exhibitions were held at the following locations:

- 13th October 2009 in Burnham-on-Sea
- 14th October 2009 in Minehead
- 15th October 2009 in Barnstaple

In addition to the public exhibitions, a number of site specific meetings were held to discuss issues at particular locations. The following table summarises these meetings and the areas of focus.

Date	Venue / organisation	Main area covered
1 st October 2009	Exmoor National Park Authority	Porlock Weir
22 nd October 2009	Wessex Water	Possible assets at risk
27 th October 2009	Stearr Peninsula	Exhibition combined with Stearr project consultation
2 nd December 2009	Porlock	Exhibition combined with Porlock flood awareness event
7 th December 2009	Minehead Golf Club	Minehead defences and Dunster beach
14 th December 2009	Fremington Parish Council	Fremington

B.6.3 Co-ordination of responses

E-mails, consultation response forms and written responses were directed to [the](#) Environment Agency and forwarded to Halcrow, for collation and review. A copy of the response form can be viewed in section B.5.1.8.

Stakeholder responses received a standard reply from the Environment Agency acknowledging the response. This reply was sent in e-mail or letter format with consistent format and text.

B.7 Consultation Responses

B.7.1 Form of Responses

Responses were received from over 90 residents, businesses, Parish Councils and other organisations. Responses were received in a variety of forms:

- letters;
- consultation response forms (hand written and electronic); and
- e-mails.

B.7.2 Method of Analysis

All comments and responses received were recorded as detailed below:

- upon receipt by the Environment Agency, each response was given a reference number;
- details of each response were entered into a Consultation Response Register by Halcrow (e.g. date, name, contact details, area of interest, comment and if any revision may be required);
- responses were categorised into the following themes – general comments about the SMP; comments about the mapping contained in the SMP; comments about the main document; comments about specific Appendices; and comments relating to specific areas/policy statements; and
- each comment was considered and actions required noted against each.

B.7.3 Responses

The comments made in each response were recorded against the response themes referred to in section B7.2. Annex B.5 summarises the key/pertinent points of each of the responses received and how each comment has been dealt with to produce the final SMP document.

Annex B.I – List of all Invited Stakeholders

The following lists all those stakeholders invited to participate in the SMP process as part of the Initial Stakeholder Engagement and those that have registered their interest throughout the review. Those stakeholders highlighted in blue responded positively and requested that they be kept informed of progress with the SMP review.

- Abbotsham Civil Parish
- AboutMyArea
- Adventure Schools (Skern Lodge)
- Alwington Civil Parish
- Amphibious Trials and Training Unit - Royal Marines at Instow
- Archaeology Service Gloucestershire County Council
- Ashford Parish Council
- Aspen Enterprises Limited
- Association of Drainage Authorities (SW Branch)
- Atcol Limited
- Atlantis Lodge
- Avon Wildlife Trust
- Barnstaple Civil Parish
- Barnstaple Town Council
- Berrow Parish Council
- Berrynarbor Civil Parish
- Bideford Amateur Rowing Club
- Bideford Canoe Club
- Bideford Harbourmaster
- Bideford Town Council
- Bishops Tawton Parish Council
- Bleadon Parish Council
- Blue Anchor Bay Caravan Park
- BoS Sailing Club
- Bossington Farm
- Braddicks Holiday Centre
- Braunton Civil Parish
- Braunton Marsh Inspectors
- Braunton Marsh Internal Drainage Board
- Brean Leisure Park
- Brean Parish Council
- Brent Knoll Parish Council
- Bridgwater Town Council
- Brightholme Caravan Park
- Bristol Channel Federation of Sea Anglers
- Bristol Port Company
- Bristol Queen, Cruise Ferry Services
- British Association for Shooting and Conservation
- British Energy
- British Marine Aggregate Producers Association
- Brue Yachts
- Burnham Parish Council
- Burnham and Berrow Golf Club
- Burnham and Highbridge Town Council
- Burnham and Somerset Levels Sea Flood Study Group
- Burnham Area Rescue Boat
- Burnham on Sea Holiday Park
- Burnham On Sea Motor Boat and Sailing Club
- Burnham Water Ski Club
- Burnham Water Users' Forum
- Burnham-on-Sea and Highbridge Town Council
- Campaign to Protect Rural England
- Cannington Parish Council
- Carefree Exclusive Holiday Homes
- Carhampton Parish Council
- Carver Knowles
- Chamber of Trade and Commerce
- Chilton Trinity Civil Parish
- Christies
- Clovelly Civil Parish
- Clovelly Estate Company
- Coastal Concern Action Group
- Coastwise North Devon
- Colin Brown Environmental Ltd
- Combe Martin Museum
- Combe Martin Parish Council
- Combe Martin Silver Mines Research Group
- Countisbury Civil Parish
- Country Land and Business Association
- Country View Holiday Park
- Crowcombe
- Crown Estate Commissioners (Marine Estates)
- Croyde Bay Cottages
- Defence Estates
- Defra
- Devon Birdwatching and Preservation Society
- Devon Conservation Forum
- Devon County Council
- Devon Sea Fisheries Committee
- Devon Wildlife Trust
- Dome Propco Limited
- Doniford Bay Holiday Park
- Doniford Farm
- Dunster Beach Holidays Ltd
- Dunster Parish Council
- East Brent Parish Council
- East Huntspill Parish Council
- East Quantoxhead Estate

- East Quantoxhead Parish Council
- Eden Resource Management
- EDF Energy
- Elms Caravan Site
- English Heritage
- Environment Agency
- Exmoor National Park Authority
- Fairfield Estate
- Farming and Wildlife Advisory Group
- Finding Sanctuary
- Forestry Commission
- Free Enterprises Group
- Fremington Army Training Camp
- Fremington Civil Parish
- Friends of the Earth
- Georgeham Civil Parish
- Government Office for the South West
- Green World Trust
- Hartland Parish Council
- Heanton Punchardon Civil Parish
- Hele Valley Holiday Park
- Helwell Bay Holiday Campsite
- Hewitts Hotel
- Hinkley Point Sailing Club
- HM Coastguard
- Hoburne Holiday Parks
- Holford Parish Council
- Home Farm Holiday Centre
- Horner Farm Riding Stables
- Hurnham Boat Owners SAA
- Hutton Parish Council
- Ilfracombe Civil Parish
- Individual interests, e.g. residents x 55
- Individual interests, e.g. residents x 75
- Infomap
- Instow Civil Parish
- Isted Equestrian
- John Fowler Holidays Limited
- Joint Nature Conservation Committee
- Kenneth Allsop Memorial Trust
- Kewstoke Parish Council
- Kilve Parish Council
- Knightstone Harbour Association
- Landcross Civil Parish
- Leaderflush and Shapland Holdings Ltd
- Lillycombe Estate
- Littleham Civil Parish
- London and Western Developments
- Luttrell Estate
- Lymsham Parish Council
- Lyn and Exmoor Museum
- Lyn and Exmoor Vision
- Lynton and Lynmouth Civil Parish
- M and R Hicks Leisure Ltd
- Marine Conservation Society
- Mariners Marine Consultants
- Maritime and Coastguard Agency
- Maritime Volunteer Service
- Martinhoe Civil Parish
- Mendip Area Highways Office
- Merlins Amusements
- MHJ Limited
- Midland Caravan Park Limited
- Minehead and West Somerset Golf Club
- Minehead Harbour Master
- Minehead Harbour Users
- Minehead Sailing Club
- Minehead Town Council
- Mitchells and Butchers Retail Limited
- Morteheo Civil Parish
- National Farmers Union
- National Federation of Sea Anglers
- National Grid
- Natural England
- Neatwelcome Limited
- Nickel-electro Ltd
- North Devon Archaeological Society
- North Devon Areas of Outstanding Natural Beauty
- North Devon Council
- North Devon Fishermen's Association
- North Devon Yacht Club
- North Devon's Biosphere Reserve
- North Morte Farm Caravan Park
- North Somerset Council
- North Somerset Internal Drainage Board
- Northam Burrows 1716 Committee
- Northam Town Council
- Northern Devon Healthcare Trust
- Notts Contractors Limited
- Oare Parish Meeting
- Old Cleeve Parish Council
- Otterhampton Parish Council
- Parents Concerned About Hinkley
- Parkdean Holiday Parks Ltd
- Parkham Civil Parish
- Parkin Estates Limited
- Pawlett Parish Council
- Pearce Construction (Barnstaple) Limited
- Percy R Brend and Sons (Hoteliers) Ltd
- Pilton West Civil Parish
- Plymouth Coastal Observatory
- Plymouth Marine Sciences Partnership
- Porlock Parish Council
- Portledge Estate Ltd
- Puriton Parish Council
- Putsborough Sands Limited
- Retreat Caravan Park
- RNLI Minehead
- Rolle Canal Society
- Royal National Lifeboat Institution
- Royal North Devon Golf Club

- Royal Society for the Protection of Birds
- Royal Yachting Association
- Salzen Holdings Ltd
- Sandyglade Caravan Park Limited
- Saunton Golf Club Limited
- SeaQuarium
- Sedgemoor and West Somerset Green Party
- Sedgemoor District Council
- Sedgemoor Tourism Association
- Selworthy and Minehead Without Parish Council
- Severn Tidal Power Group
- Somerset Archaeological and Natural History Society
- Somerset Branch British Holiday and Home Park Association
- Somerset County Council
- Somerset Drainage Boards Consortium
- Somerset Local Authorities' Civil Contingencies Unit
- Somerset Wildlife Trust
- South West Coast Path Association
- South West Coast Path Team
- South West Regional Flood Defence Committee
- South West Tourism Ltd
- South West Water
- South West Way Association
- Sports Council SW Region
- St Audries Bay Holiday Club
- Stockland Bristol Parish Meeting
- Stogursey Parish Council
- Strington Parish Council
- Sunnybank Caravan Park
- Taunton and Minehead Rail Link Co
- Taw Torridge Estuary Forum
- Taw Torridge Nets
- The 3 B's
- The Beeches Holiday Park
- The Blue Anchor Hotel
- The Crown Estate
- The Devon Archaeological Society
- The Exmoor Society
- The Gaia Trust for Cornwall
- The Grand Pier Ltd
- The Museum of Barnstaple and North Devon
- The National Trust
- The Otter Conservancy
- Torridge CPRE
- Torridge District Council
- Trentishoe Civil Parish
- Tyco Networks (UK) Ltd
- University of Exeter
- Upper Axe Internal Drainage Board
- Valecord Ltd of Sandy Cove Hotel
- Wales and West Utilities Limited
- Warren Bay Holiday Village
- Warren Farm Touring Park
- Watchet Association of Commerce, Enterprise and Tourism
- Watchet Boat Owners Association
- Watchet Harbour Advisory Committee
- Watchet Harbour Marina Limited
- Watchet Harbour Master
- Watchet Market House Museum
- Watchet Town Council
- Water Ski Club
- Water Ski Racing
- Watermouth Harbour Limited
- Watermouth Valley Camping Park
- Wembdon Civil Parish
- Wessex Fisherman's Association
- Wessex Regional Flood Defence Committee
- Wessex Water
- West End Farm Caravan Park
- West Huntspill Parish Council
- West Mendip Internal Drainage Board
- West Quantoxhead Parish Council
- West Somerset Council
- West Somerset Railway Plc
- West Somerset Strategic Partnership
- Western Power Distribution (South West) Plc
- Westleigh Civil Parish
- Weston Bay Watersports Club
- Weston Bay Yacht Club
- Weston Small Boat Club
- Weston Tourism Blue Skies Action Group
- Weston-super-Mare Civic Society
- Weston-super-Mare Golf Club
- Weston-super-Mare Hotels and Restaurants Association
- Weston-Super-Mare Town Council
- Westward Ho! and District Residents Association
- Westward Ho! Residents Association
- Wildfowl and Wetlands Trust
- Willhays Corporation
- Williton Chamber of Commerce
- Williton Parish Council
- Woolacombe Bay Holiday Parcs
- Woolfardisworthy Civil Parish
- Wyndham Estate
- Yelland Quay Ltd

Annex B.2 – Stakeholder Comments during Initial Stakeholder Engagement

The following presents the comments provided by stakeholders as part of the Initial Stakeholder Engagement. This information was used to inform the identification of features, issues and objectives (refer to **Appendix E**).

Name/Position (NB: individual contributors names & positions not published for consultation draft)				Organisation	Affected by erosion	Main Issues	Future Management	Defences Impact?	Defences Changes?
				<i>Non-affiliated individual</i>	Yes. It is extremely difficult to A). Obtain funding; B) Obtain information, C) Communicate - with people and especially 'Government' "organisations" (because they are NOT organised) for morphodynamic investigations/information. 2ND SUBMISSION - Yes. Can't get useful data - no other organisation has survey instruments available to measure flood detail. Yes I have historical work but can't get funding to vectorise data.	Coast is not adequately managed - ad hoc and miss-guided. poor people control on sensitive dune fields. over reliance on seawall concrete structures. Traditional responses too many artificial boundary. 2ND SUBMISSION - New ways to gather data. Specific rules - policy and measurable outcome. More holistic. Sewage and storm water discharges. Inlets and drainage basins. The coast is being actively degraded!	Rational - objective - reality. 2ND SUBMISSION - A clear set of research/investigations over a long period of time - selecting innovative and novel data collecting instrumentation - and giving public free access to data and information. Make sure the d...?? 3RD SUBMISSION - There are baseline problems, e.g. the EA benchmarks are in silly places and inaccurate. 100yr projection is hopeful. At present the way the coast is perceived is dismal and reflects a culture.	Yes. The "defences" can be shown to have lead directly to the degradation of the coastal environment - however, much is a result of human aspiration based upon subjective, and to frequently irrational notions, of what an environment 'should' look l...?? 2ND SUBMISSION - Yes - if the present "engineer" approach is continued there will be increasing conflict. Aspiration 'v' rationality. Still ad hoc and the design work is not good. Think in a box.	yes. serve the great number of people and the environment in a sustainable future 2ND SUBMISSION yes. A massive improvement, but this would mean a change in the present climate, and change of direction of policy. 3RD SUBMISSION - Get rid of them, you are at best buying time. "Defences" are put in the risk box because there's insufficient data and experience but the machine grinds on.
				CPRE, Torridge District Council	Not directly	SEE SEPARATE LETTER. Consideration given to the users - especially tourists and farmers - of Northam Burrows. Much of the prosperity of the area depends on the income indirectly attributable to the Burrows. 2ND SUBMISSION - breaching of the Northam Burrows pebble ridge would affect the covered refuse tip, houses in Westward Ho!, the widely used recreational area of Northam Burrows and hence local tourism. The greatest danger comes from the north-west corner, where current erosion is most prevalent and where the refuse tip is located.	To try to ensure that this part of the coastline is dealt with sensitively and sensibly. 2ND SUBMISSION - secure the Northam Burrows old refuse tip to prevent damaging and widespread pollution. Secure Northam Burrows itself as a widely used recreational area, even allowing for some temporary sea flooding.	Defences impact? Plenty! Especial the natural defences i.e. the Pebble Ridge! 2ND SUBMISSION - building the sea wall many years ago to protect Westward Ho! Village may have had an impact on the pebble ridge and northward movement of pebbles.	There are very few natural coastal defences for the discontinued refuse tip on Northam Burrows. We consider that some protection is needed sooner rather than later - i.e. too late!! 2ND SUBMISSION - no question about the man-made and natural defences of the houses at Westward Ho! Being maintained. Occasional sea incursions into the Burrows have occurred in the past and will continue but the greatest erosion is on the north west tip and this should be defended. Erosion of the refuse tip and general loss of the golf course and Burrows MAY be unavoidable if sea levels rise and violent storms increase in the next, say 30 years.
				<i>Non-affiliated individual</i>	We live on the Golf course at Minehead where erosion is rapidly depleting the dunes/coastal path. The property listed above as well as two other properties I own are at risk of flooding if the sea defences are not maintained at their current level.	As far as I am aware it is not being managed in the area that I am talking about. I would like to see a continued management of the sea defences in order for my properties (which includes all my assets) to be worth something.	I would like to be assured that our home, which has stood here for the last 400 years is going to remain here.	There are no defences on this stretch of coast line.	Not without further research.
				Devon Conservation Forum	The Forum represents a wide spread of Devon interests including the Minerals and Fishing Industries as well as schools and local councils. Some of our organisations are affected.	The predicted effects of Global warming. The increasing human impact on biodiversity. The use of offshore energy capture schemes including tidal barrages.	To maintain the acknowledged beauty of our coastline.	The loss of Crow Point in the Taw Torridge estuary indicates a deficiency in the management of the fragile coastline from Westward Ho! to Saunton.	A better understanding of coastal sediment drift might lead to a change in existing coastal defences.
				Aspen Enterprises Limited	Not been affected so far but loss of power or other facilities due to flooding would have a significant effect.	Businesses close to the coast are not actively informed of the plans.	The risk of flooding should be kept low.		Land should not be abandoned without first considering not only the direct consequences but indirect consequences.
				<i>Non-affiliated individual</i>	Private dwelling.	I am concerned about the erosion of our beach due to the sand	To protect the existing coastline.	Under consideration.	

Name/Position <i>(NB: individual contributors names & positions not published for consultation draft)</i>				Organisation	Affected by erosion	Main Issues	Future Management	Defences Impact?	Defences Changes?
						dredging and the effect it will have on the flooding risk.			
				<i>Non-affiliated individual</i>	Private resident	Concerned regarding proposed location for tidal barrages. Brean Down to Lavernock Point will do nothing but harm to Somerset. Much better would be Minehead to West Aberthaw.	The management must dedicate time to the best option regarding the location for any tidal barrage to enable it to benefit and protect the whole of Somerset and perhaps as most of north Devon as practical.	So much excavated material is going to inland landfill sites that should now be co-ordinated to protect our coast.	Due to population and coastal living communities it is not practical to give back to the sea any or part of our coast, therefore a uniform defence is required that should be supported by all.
				The Blue Anchor Hotel	Our business is under serious threat from coastal erosion. Natural England visited us and made an estimate that our public house will need to be closed due to the risk by the end of 2008.	As far as we can gather, there are millions of pounds sitting waiting to be allocated but it's not being done quick enough. People are losing their homes and businesses.	-	-	-
				<i>Non-affiliated individual</i>	Only insofar as the rest of the Village of Berrow is at risk. At times of particularly high tides, it is quite usual to see flotsam deposited ON TOP of the Foredues of Berrow Beach. 2ND SUBMISSION: Whilst Julians Acres is shown on the EA's 'Flood Risk' map as being outside of potential flood risk area, the fact remains that Berrow Dunes suffer occasional erosion, which if left unchecked, puts the whole of the Village at risk.	Having contacted, resulting in a site visit, Sedgemoor DC after substantial erosion of the Foredues last year, I understand that any 'management' of the Foredues can only be carried out with the permission of Natural England. Given that Natural England & their predecessor, English Nature, do little if anything in the way of active management of the SSSI (of which the Foredues are a part) but maintain that, despite the transient nature of the Dunes - being constantly eroded then rebuilt by the prevailing wind - the Foredues are sacrosanct. It seems to me that, protecting the Village is equally - if not more - important than a not particularly ecologically interesting foreshore and that, if and where necessary, modest engineering solutions to protect the Foredues (which are, in effect the first line of Sea Defence) should be put in place. In particular, I would respectfully suggest that the use of seed mats protected by modest barriers formed with piled natural wood (waste from small woodland management elsewhere within the County / driftwood) would be entirely appropriate. 2ND SUBMISSION: The management should be solely in the hands of water management experts - preferably Water Engineers and	Given all the siren calls about rising tide levels due to so-called 'Global Warming', to ensure that the Dune system that acts as the primary Flood Defence system for the village of Berrow, is actively managed so as to ensure against long term degradation. 2ND SUBMISSION: That where serious erosion is known to occur, steps are immediately taken to ameliorate the potential damage that subsequent events may cause.	It would appear - and I am led to understand - that with little or no discernable Littoral Drift along this part of the coastline, the Dune system is more or less self-perpetuating with build-up following erosion on a regular basis.	As stated elsewhere, I am firmly of the belief that, if the doom-mongers are to be believed (report by SCCAS published February 2007, in part, refers) more active & positive management of the Dunes along the length of Berrow Beach is a MINIMUM requirement and that where necessary Engineering solutions should be implemented, despite objections by Natural England. (N.B. it is perhaps worth remembering that the SSSI boundary along part of the Foredues was, like many other SSSIs, drawn with a particularly thick pen / pencil). 2ND SUBMISSION: I think that there should not be any reluctance on the part of the Authorities to combine engineering solutions with those occurring naturally and that the protection of people and property should take precedence over nature conservation when necessary.

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						NOT as in the case of Berrow Dunes in the hands of a Conservation Body, currently Natural England, whose objectives are not necessarily the prevent.			
				Sedgemoor & West Somerset Green Party	We are particularly concerned about the probable, economic, social and ecological impacts of rising sea levels. We wish to see a comprehensive long term plan to tackle the challenges associated with rising sea levels. Given the possible rapid and sign.. ..??	-	We wish to see full community involvement, particularly in areas subject to managed coastal realignment, especially where local, regional and national authorities have an input into residential and commercial development. We wish to see defences, where.. ..??	We think there has been unsustainable (in that it may not be defensible) development, behind coastal defences in very low lying areas (like building developments on flood plains).	-
				Burnham & Somerset Levels Sea Flood Study Group	SEE SEPARATE LETTERS. The Levels have NO defence.	There are no defences from Brean Down to Minehead. The probable Weston/Lavernock barrage.	The proposed Weston Barrage is in the wrong place. It should be in the Minehead area. The safety of the Somerset Levels and the maximum production of power.	We had a taste of this when the sea came in 1981, resulting in the building of the sea wall at Burnham. When you look at the big picture it is a waste of money. Defences are nowhere near adequate and no thought on the effects of the Barrage.	Most of the Somerset Levels are below present high tide levels and there is no defence against rising tides. If you put your finger into a running stream water is displaced to the left and the right. The proposed Weston Barrage will displace water to? The building of a barrage at Minehead.
				<i>Non-affiliated individual</i>	Marine Court flats were surrounded by seawater in 1989. A wave return wall was built half a metre higher than the original. OK now, but for how many years?	The Taw/Torridge estuary has an 8 meter tide and is liable to flooding.	Build a tidal barrage across the estuary, providing access for the shipping. An enormous amount of electrical power could be generated for free. Install wind turbines on the intermediate towers to provide more free energy. Install a wave generator station on the Bideford bar to generate even more free energy all using the common cabling. If a road was laid over the barrage, the Braunton congestion would be eliminated.	TOTALLY BENEFICIAL	See above
				<i>Non-affiliated individual</i>	We are in the flood plain of Yeo/Taw Estuary area and have noticed significant amounts of water in our cellar this season. We are concerned about the general effects of rising sea/river water in the future. we would like to support the case for a tidal.. ..??	Dealing with current flood water in Yeo Vale before it gets any worse.	Any thing with good long term objectives and if it includes an energy plan, so much the better.	I was a little concerned when the work on the new bridge seemed to cause more water in the Yeo confluence than previously.	As mentioned above, I/we fully support this plan.
				Avon Wildlife Trust	Yes, we own or manage nature reserves which may be affected. Own Walborough Nature Reserve, south of W-s-M.	-	-	-	-
				Berrynarbor Civil Parish	Yes, diversion of roads and loss to parishioners property.	Give good public access, i.e. repair eroded paths.	Access.	-	-
				Bideford Harbourmaster	Yes - some harbour areas flood.	More flood protection would be advisable.	To keep wharfage available to shipping - rather than to turn to residential use. Shipping is a greener more efficient way of transporting many materials and	Defence construction has increased land availability, sometimes to the detriment of river cross section.	-

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							people.		
				Braunton Civil Parish	Yes, the parish of Braunton has long coastal and estuary boundary from down end to RMB Chivenor. Also have responsibility to all our residents.	Protection of flood defences for the parish, village centre and residents.	Protection of community and properties both private and commercial.	Existing defences protect village (app 8000 inhabitants) which are below sea level.	Maintain existing defences - this is essential.
				Braunton Marsh IDB	The drainage area exists due to the reclamation of Braunton Marsh through the Act of Parliament 1815. The inner bank along the toll road was constructed from Marstage Farm to Broadsands. At the second reclamation the Great Seawall at Horsey was constructed from Velator to the White House. December 22nd 1911 - SW gales and high tides breached the seawall destroying Linhays and livestock.	Responsibility of the Great Seawall and the flapped outlet at Horsey being taken away from the landowner. The outlet stops seawater coming into the drains and lets freshwater from the marsh.	Drainage board responsibilities do not incorporate the coastline.	Existing sea defences have enhanced and enriched lands for agriculture and stock grazing improving farmers livelihood.	No changes should be made to existing coastal defences but upkeep needs to be under the powers of the EA instead of a private landowner.
				Bridgwater Town Council	Significant parts of town identified as Flood Zone 3 by EA.	Flood defence - opening up for residents/visitors recreational purposes.	Flood defence - opening up for residents/visitors recreational purposes.	Not at this stage.	Not at this stage.
				Bristol Queen, Cruise Ferry Services	We are very exposed when westerly gales accompany very high spring tides.	Primarily, I think we now have a golden opportunity to bring into being a Severn Barrage, more than at any time before.	I think that the ideal place for a Barrage would be Hurlstone point to Nash point other than Breaan down/Lavernock. This would generate more electricity and protect far more land Somerset levels and all upward.	The Victorians and their forefathers did a wonderful job given the technology and resources available to them, had they had our means available to them we would not have these problems now because they would have just got on with it.	As above, I think the time for the Barrage has finally come, as a Nation we cannot afford to be without it both from a power generation and sea defence point of view, as for all the panic about the birds and wild-life, it will just adapt as it always does, just look at the smaller Cardiff enclosure, benefits all round!
				Burnham Water Users' Forum	Yes, large tidal rise/fall and strong tidal currents. The port is on the coastal edge of the Somerset Levels.	-	-	-	-
				Cannington Parish Council	No	-	None	-	-
				Carhampton Parish Council	The seafront tourist amenity at Blue Anchor.	-	To prevent loss of roads and dwellings.	-	-
				Chamber of Trade and Commerce	I could send you aerial photos of floods in the 1960's when what is now our only enterprise park with over 100 businesses on it, was under water!	Too much interference and too little in a stretch of only 6 miles on our coastline, shows inconsistency.	Some positive long term strategy which we can rely on. We currently have a slither of sand and pebbles to the east of Minehead eroding at 25% pa and no plans to save the hinterland on the table.	Yes but there isn't enough paper to list them all!	Ditto above, but it's all about money!
				Chilton Trinity Civil Parish	The tidal river Parrett poses a risk of flooding which affects new development in the parish but does not prevent development.	Adequate protection of domestic and commercial property and farmland from loss through erosion or flooding.	The existing defences for the Parish should be maintained to provide a level of safeguard at least equivalent to that they presently provide.	-	-
				Clovelly Estate Company	Yes, Clovelly Estate owns 4 miles of coast from Hobby Drive to	Protection of settlements through maintenance of defences. In our	Do all we can to minimise erosion and mitigate any flooding as a	-	-

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					Mouth Mill including the village of Clovelly. We are vulnerable to flooding from major storms in the Atlantic, which affect our properties on the seafront. Our cliffs suffer continuous, minor erosion.	case the harbour wall.	result of storms. Maintain a watch brief on rising sea levels.		
				Combe Martin Parish Council	There is a potential risk to properties and businesses around the beach, harbour and seaside area. These have been flooded in the past and the problem will worsen if sea levels rise. The cliffs on both sides of the bay are of shillet and erode naturally.	Maintenance of the large sea wall between Combe Martin and Newberry beaches and behind Newberry beach. This supports the SW coastal path as well as the A399 road.	To maintain the status quo of the defence line.	Existing defences have reduced erosion of the rock formation between Newberry and Combe Martin beaches, which is important owing to the closeness of the A399 main road (especially as this is the only road through this long village).	The existing coastal defences should be strengthened. This would ensure the protection of the main road, the A399.
				Country Land & Business Association	Our members own/manage coastal land at risk of flooding.	Increase in Government commitment/funding for coastal defences. Recognition of the impact of flooding on rural areas, houses and businesses.	Protect houses, agricultural land (which is productive) and businesses.	Businesses have been developed inline with protection. To reduce commitment could have serious impact on businesses/houses.	Think carefully about wetlands/managed retreat. Ok where appropriate but not the solution in every case.
				Devon Sea Fisheries Committee	Not directly but fisherman's livelihoods could be affected.	Minimum interference with natural coastline.	-	-	-
				Dunster Beach Holidays Ltd	SEE SEPARATE LETTER. Yes whenever we encounter 12mtr tides they tend to top over our recreational /car park area. Over the years we have been flooded on a number of occasions and during high winds and high tides we get excessive flooding. We have installed groynes and bolstered the sea front which has helped but not solved the problem. We also paid £7k for a future plan with ground levels on our site etc which indicates problems in the future. We have 230 Chalets immediately on the sea front that are also in danger in the future plus main buildings, a shop, etc.	At present we have nothing in the plan and would like to be considered for help and assistance in the future. All the work carried out has been in house at great cost.	To protect the site and Chalets with a value of over £25.000.000, which is currently unprotected.	The work at Minehead has had an effect on our site, especially the removal of stone from Warren point a few years ago. This has made us more vulnerable to the sea, again on the bigger tides.	No as all the defences carried out here have been self administered and financed. Something we need help with.
				Dunster Parish Council	Coastal erosion within our parish boundaries.	-	-	-	-
				Forestry Commission	Unlikely to be woodland/forestry issues which would justify extra physical protection against erosion.	-	-	-	-
				Fremington Civil Parish	Fremington parish has a significant stretch of estuary shoreline along its northern boundary and is home to 11000 people.	We believe the coastline should be managed to hold the existing defence line.	The existing defence lines need urgent repair in several areas, e.g. Penhill to Isley Marsh and Anchor Wood to Shapland & Peter development site. That North Devon Council should renew its	Not really but we have concerns about how the new MOD defences at Chivenor will effect us.	The existing defence lines need urgent repair in several areas, e.g. Penhill to Isley Marsh and Anchor Wood to Shapland & Peter development site. That North Devon Council should renew its

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							lease on the foreshore and allow the people of North Devon to be in control once more.		lease on the foreshore and allow the people of North Devon to be in control once more.
				Grand Pier Ltd	Our business is on a pier.	We would like to see solutions that keep tourism firmly in mind, so there is commercial assessment as well as the prevention of flooding to sustain coastal towns.	We would like to see our own marina to control rising water levels and to enhance our coastal town for the tourists who choose to stay in the UK for their holidays.	-	-
				Heanton Punchardon Civil Parish	No - but a tidal river stretches into the parish.	Coastal erosion caused receding sand hills at Saunton. Heavy tourism use of Saunton in the summer.	Maintenance and improving the line against the sea at Saunton. Re-introduction of planting of marram grass to retain sand hills at Saunton.	URGENT - the line of the beach front has receded over the years due to lack of maintenance.	1. Piling fences erected to stop winter erosion. 2. A planned programme of winter planting of marram (community service use?). 3. Control of use of military vehicles on sand hills.
				Home Farm Holiday Centre	Loss of St Audries little harbour and break waters, gentle cliff erosion which will eventually make it difficult to reach the beach.	Totally against opening up coastal paths to general public - what happened to "An Englishman's home is his castle"?	Conservation of SSSI.	-	-
				Kenneth Allsop Memorial Trust	Minimal flooding with easterly storms. Old Inn building too damp for use. Boat house and access path above beach occasionally under water.	Not to destroy the present environment, built or otherwise, unless really necessary. No panic measures leading nowhere.	Not to destroy natural beauty. To protect genuinely vulnerable properties.	Some coastal defences have obstructed views unnecessarily.	Non-obstructive where possible. Some schemes seem over-reactive.
				Landcross Civil Parish	SEE SEPARATE NOTES.	1) The main issue is possible loss to landowners, resulting from rising sea levels, with consequent landward movement of the MHW line. In nearby Bideford, the possible inundation of large parts of the town might cause serious inconveniences. 2) Research solutions to coastal erosion problems at Northam Burrows and secure Northam Burrows. 3) Ensure that footpaths are maintained, including Tarka Trail.	1) The overriding objective should be the maintenance of North Devon's beautiful coastline for not only ourselves, but also for future generations. 2) To maximise the wildlife potential of the salt marshes while maximising grant aid for that purpose.	In Landcross, breaching the defences has enabled saltmarsh habitat to develop through receipt of habitat scheme payments by landowners.	-
				Littleham Civil Parish	SEE SEPARATE NOTES.	1) The main issue is possible loss to landowners, resulting from rising sea levels, with consequent landward movement of the MHW line. In nearby Bideford, the possible inundation of large parts of the town might cause serious inconveniences. 2) Research solutions to coastal erosion problems at Northam Burrows and secure Northam Burrows. 3) Ensure that footpaths are maintained, including Tarka Trail.	1) The overriding objective should be the maintenance of North Devon's beautiful coastline for not only ourselves, but also for future generations. 2) To maximise the wildlife potential of the salt marshes while maximising grant aid for that purpose.	In Littleham the existing defences have enabled grazing of the marsh meadows to continue.	-
				Lynton and Lynmouth Civil	Yes - constant caution needed to monitor high tides or Lynmouth is	Protection of existing shoreline. Reinstatement of breakwaters etc	-	-	-

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				Parish	in danger of building damage through flooding.	to reduce wave damage.			
				Mariners Marine Consultants	Only in so far as the port of Ilfracombe might be affected.	To include the interests of commercial shipping where appropriate.	I share the goals of the SMP.	-	-
				Minehead & West Somerset Golf Club	SEE SEPARATE LETTER. Significant floods and damage by pebbles/boulders/sand and seawater in 1954, mid 80's, February 1990 and 1996 which led to the sea defences being built at Minehead. Significant erosion since with risk of breachment and flooding at very high tides coupled with severe weather conditions.	We do not believe it is being managed. Sand may be moved around the beach but no evidence of maintenance to the shoreline of the golf course has ever taken place. Observation and recording may have taken place but there has been no action.	Repair it, enhance it, protect it.	1) More erosion immediately past last groyne because of changed tidal flow. 2) More sand and higher dune. More sand blown onto the course causing problems. More sand in club house and in car parks. 3) Erosion to shingle bank along the course. Now beginning to encroach onto public footpath.	Complete the Minehead defence scheme as proposed. Suggestion that the deposit of the 'right type of shingle' along the shoreline did not take place because of finance shortfall. Anecdotal evidence shows that the right type of shingle used to diffuse the waves is an excellent method of preventing erosion. Do the job right and it will protect the coast for decades to come.
				Minehead Town Council	No	Emergency planning at a town parish level.	Would like the town council to be included in any planning.	Should have a public meeting to address residents concerns.	Should have a public meeting to address residents concerns.
				Mortehoe Civil Parish	No	Dredging in Bristol Channel leading to possible changes in sand levels. Erosion of dunes.	Safeguard the coastline and coastal environment.	No	No
				North Devon District Council	Coastal flooding at Ilfracombe harbour has long been a problem. Rising sea levels give cause for concern for the future. The inner harbour quay becomes awash today when there is a high spring tide or a sea running. Even a small rise in sea levels will cause personal danger to those living around the harbour as well as damage to property.	Coastal defence for coastal communities. Some areas will need to be sacrificed to stabilise and protect the working communities of ports and harbours.	Identification of a realistic long term defence line and harbour development to protect that line.	No	Yes, new quays should be built to the required height at the defence line. This should include a lock gate/sill gate to protect against extreme events.
				North Devon Yacht Club	Yes. Spring tides and storm surge come over.	Help to improve our sea defences to combat anticipated sea level rises.	Protection of premises.	-	-
				North Somerset Council	Zone 3 flood risk, including Weston-super-Mare affected by tidal flooding.	Sustain regeneration at Weston.. Also maintain habitats and protection to rural hinterland.	-	-	-
				North Somerset Council	Known risk at Weston-super-Mare but plans in hand for mitigation.	Covered by council policy - happy to discuss further if appropriate.	Covered by council policy - happy to discuss further if appropriate.	Covered by council policy - happy to discuss further if appropriate.	Covered by council policy - happy to discuss further if appropriate.
				Northam Town Council	Local authority with responsibility for the grazing on Northam Burrows.	Protection of Northam Burrows and the waste disposal site. Protection of Westward Ho! and the residential properties.	As far as possible to hold the line.	With respect to Northam Burrows the defences are, in the main, natural.	With regard to Northam Burrows the Halcrow report recommendations with regard to re-charging and the need for survey work should be continued.
				Otterhampton Parish Council	Yes. Serious flooding of Steart peninsular in 1981. Concerned about lack of action since that date.	Hold existing line - protection of community and business at Steart.	Hold existing line - threat to conservation area and SSSI.	-	Continued repair and upkeep of Clyce's. River bank maintenance to protect Combwich Common which is a SSSI and RAMSAR site.
				Parkham Civil Parish	Some dairy farms supplying milk to Parkham cheese factory on the coast have cliff erosion. Many golfers in the parish worry that	Pebble ridge must be recharged by Torrridge District Council to prevent loss of golf course and release of toxic waste from old	Pebble ridge must be recharged at Westward Ho! to protect Northam Burrows.	-	Please give permission to District Council to recharge pebble ridge. Both marines, Royal North Devon, Northam Council and

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					the loss of Royal North Devon Golf Course will lose business for local tourist businesses.	dump.			Torridge Council will meet the cost.
				Porlock Civil Parish	1) 100 ha of low lying low-grade pasture regularly flooded following flood event in 1990 and withdrawal of maintenance of shingle ridge. 2) Up to 20 properties occasionally flooded.	We would like a plan to deal with further coastal erosion in the event of sea level rise.	To hold the line at Porlock Weir and plan for possible sea level rise in future.	-	-
				Retreat Caravan Park	Yes. Storms of the 80's eroded the sand dunes but since then the dunes have increased westward.	Flooding defences for Bridgewater Bay, Burnham-on-Sea and Somerset Levels.	To continue to naturally protect our sand dunes and their vegetation.	-	-
				RNLI Minehead	Yes. Have to launch lifeboat over shingle ridge and across beach.	Access to sea at all times. No added danger to mariners and leisure users.	Allow operation of lifeboats. Encourage tourism.	Pleased how the Minehead sea defences have worked. Seems satisfactory to leave Porlock salt meadows flooded.	Not locally.
				Royal National Lifeboat Institution	Both erosion and flooding can interfere with lifeboat operations although our facilities are generally designed to cope with extreme weather conditions.	1) Preservation of access to beaches and coastal margins for the purpose of SAR operations.2) Protection of lifeboat launching facilities and preservation of access through any coastal works.	-	-	-
				Sedgemoor District Council	Yes, large tidal rise/fall and strong tidal currents. The port is on the coastal edge of the Somerset Levels.	-	-	-	-
				Somerset County Council	Somerset CC is a service provider to residents who live and work in areas at risk of coastal flooding.	Coastal biodiversity to be considered when developing the management plan.	To raise awareness of coastal biodiversity.	-	-
				Somerset County Council	Somerset CC is a service provider to residents who live and working areas at risk of coastal flooding.	Lack of communication, funding/resources for coastal management in Somerset. Plan needs to take a long term sustainable approach.	-	-	-
				Somerset County Council	Yes, Somerset County Council is a service provider to residents who live and work in areas at risk of flooding.	Personally, biodiversity issues.	Enhance biodiversity.	-	-
				Somerset County Council	Yes SCC is a service provider to residents who live and work in areas on the coast and at risk of flooding.	Clear lines of communication are required between all stakeholders, operating authorities, businesses and members of the public. Sustainable long term solutions in relation to climate change and sea level rise. Innovation in financial products and mechanisms, e.g. compensatory measures and insurance, that help manage these significant risks.	To maintain statutory duties within environmental management and regeneration on the coast. To assist with spreading reliable information to the general public.	-	-
				Somerset County Council	-	The interest of Somerset Council's Highways Group is in relation to Civil Contingencies	-	-	-

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						such as oil pollution and coastal flooding.			
				Somerset County Council	Yes SCC is a service provider to residents who live and work in areas on the coast and at risk of flooding.	Sustainable defences/management must be incorporated with a long term approach. Clear communication between coastal managers and information delivered to members of the public.	To be part of pro-active coastal management partnerships. For the coastal and catchment team to develop a coastal management strategy for SCC.	-	-
				Somerset County Council	Many heritage sites are threatened by erosion and coastal flooding. The SCC Heritage Section is also proposing the Somerset Levels and Moors as a World Heritage Site - this will require a management plan for such threats.	Archaeological value of the flood defences themselves. Ongoing erosion of heritage sites on the coast and inter-tidal area. Affect of changing sea levels and climate. Detrimental effects of managed realignment (and Severn Barrage).	1) Preventing erosion of heritage assets wherever possible and ensuring sufficient mitigation where not possible. 2) Improving our knowledge of the historic flood banks along the coast and tidal rivers. 3) Improving our knowledge of past sea level and coastal change.	Hard defences are leading to erosion of intertidal areas and the archaeology within them. Some of existing defences are significant archaeological features with origins in the medieval period and are essential to understanding the reclaimed marshland behind them, i.e. the present coastal landscape.	Managed realignment brings up a host of heritage issues as it may threaten a large number of significant sites. Evaluation is required as a first step to understanding the threat. Modification of the defences can affect their historic case - mitigation needed.
				Somerset County Council	Yes - see comments from other SCC officers	In relation to my role, the main issues are affects on Natura 2000 sites and European Protected Species.	-	-	No but would be concerned with potential effects on Natura 2000 sites brought about by proposed changes.
				Somerset County Council	-	From a strategic planning perspective, major concerns relate to flooding and the potential impacts on homes, businesses, infrastructure, etc.	To be clear about the impacts of rising sea levels, as a result of climate change and options for increasing flood defences or possible adaptation measures.	-	-
				St Audries Bay Holiday Club	No - possible erosion of cliffs but no recent evidence.	Beach access, because coastal path not easily negotiated in places. We are also concerned as to public liability cover for members of the general public who pass through our property (cliff top location), as opposed to Club Members under our insurers.	-	Your plans would seem sensible and appropriate.	Your plans would seem sensible and appropriate.
				Stockland Bristol Parish Meeting	Yes. Part of the village is below sea level and is prone to flooding.	Managed retreat.	Managed retreat.	No development on green sites.	Managed retreat.
				Taw Torridge Estuary Forum/Instow Parish Council	Yes - see Professor Pethick's Study:	Northam Burrows - Pebble Ridge and Disused Landfill site. Flooding. Erosion. Managed Realignment.	Protection of the Disused Landfill Site at Northam Burrows. Flood protection of sensitive areas. Minimisation of erosion.	In recent times we have had three flood defence schemes and two car parks extended out into the estuary. This has reduced the ability of the Taw Torridge Estuary to cope with flooding and sea-level rise.	The Disused landfill site at Northam Burrows must be defended or removed. No active intervention will result in an environmental disaster of enormous proportions for the North Devon coast and for the Taw Torridge Estuary. Recharging of the Westward Ho! Pebble Ridge has not occurred for at least four years due to Natural England's objections. This is putting the landfill site at risk.
				Warren Farm Touring Park	-	-	-	-	Ok as it is.
				Watchet Museum	The museum is at the head of the	Holding the existing defence line	Where the coastline is near sea	Most of these rock armour "just	A review of tidal currents and the

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					marina slipway into Watchet Harbour. Photographic records of erosion and flooding in the area are held by the museum.	is the only possible way for Watchet and the surrounding area. Road and rail communications are vital. The railway is of special use as a carrier of rock armour to the coastline.	level, keeping flooding to the minimum, i.e. Blue Anchor Bay and caravan park, Butlins at Minehead and Dunster beach.	in time defences" have redirected wave power to attack and demolish other cliff areas. A wider view of the effects is required, very urgent for Blue Anchor Point and Lovers Point at Helwell Bay, Watchet.	effect of surface/rain water giving the wider picture is required, not piece meal dumps of rocks. The way in which the coastline has receded should be very well catalogued in aerial photography and geological survey by now but it requires joined up thinking and doing.
				Watchet Town Council	Yes. Storms of 1901 (new harbour wall built), 1950's and the 1990's. there is everyday slippage and erosion along this coastline.	Closer monitoring and future erosion projections must be put in place particularly in the West Bay cliffs area of the highway above.	Believe this to be in the hands of SCC, West Somerset Council and the EA.	It is believed that the near defences at Blue Anchor Bay have exacerbated and existing problem and also that they didn't go far enough along. Not enough defences along by Hellwell Bay.	There do not appear to be any existing defences. Much more maintenance is needed in the areas of West Bay, Daws Castle/Cleeve Hill, the harbour and Hellwell Bay (known locally as Splash Point).
				West Mendip Internal Drainage Board	The whole of the Boards area is well below high tide level with a high risk of both tidal and fluvial flooding.	Sea Defences are VITAL for the protection of this very valuable and highly developed area with large developed areas such as Weston-super-Mare lying within the Boards area.	For the Board to continue to carry out its VITAL on going land drainage works so this valuable area can be used for the many uses it currently has - these in turn are totally dependant on the Sea Defences.	As above - sea defences are VITAL for the area - and without whole area would have been a saltmarsh area !!!!	As above.
				<i>Non-affiliated individual</i>	My interest is heightened by the fact that any tidal flooding into Weston town could leave my house under several feet of water.	I am uneasy by the failure to check the genuine historical precedents of past flooding but rely on computer based diagrams, some of which contradict each other.	The safety of the people who live here.	That is a philosophical question. Stone walls allow urban development but sand banks prohibit growth. It is, for instance, fascinating that an OS map of 'Brent Levels' (south of Weston) still shows signs of being scoured by the great 1606 flood.	If global warming is to raise sea levels '3ft by 2100' I suspect that the only genuine safety for us lies in the barrage, but I believe it would ruin local ecology and threaten the Somerset Levels. I am grateful this is your problem and not mine!
				<i>Non-affiliated individual</i>	I live approx. 200 meters from the beach at Uphill, an area that was extensively flooded in 1981 before the existing sea defences were built.	I think there should be a long term plan in which the local communities are fully consulted and involved. (for example there is a thriving Village Society in Uphill). There is obviously a need to strengthen and develop sea defences over time but in a w...??	Much depends in the long term in this particular area on whether a tidal barrage is built from Breaan Down across the Channel. Whether or not this happens, as a local resident I would like to think that my local community will be protected from the aff...??	I believe that recent work (e.g.. changes made to the sea walls when the sewage treatment plant was constructed at Breaan a few years ago) have enhanced the environment for walkers and extended the flood plane of the River Axe which is obviously importa...??	I support the current measures which are currently under construction/or planned for the Northern end of the W-s-M seafront. However there needs to be more protection of the sand dunes at the southern end and regular maintenance of the defences at the...??
				Nickel-electro ltd	We are currently working on a disaster plan for our business [post Gloucester floods] as we sit at or below sea level here, in Weston-s-Mare [Oldmixon area] - employing 40 people. We are a single site and manufacture equipment for shipment around the world.	Concern about sand dunes between Uphill and end of Weston seafront, natural defence, inundation from high tides, poorly managed. Sand removed from bass dunes, e.g. beach races etc, loss of vegetation stabilising sand. This barrier provides only sea defence for large swathes of W-s-M. Coastal defences at Weston seafront are being improved - splash wall, etc. Nothing considered for	Low lying areas with no reasonable housing/business use should be allowed to flood naturally. Concentrate on defending those areas with economic activity. Regular reviews and contingency measures.	-	Please be sympathetic to surroundings/views.

Name/Position (NB: individual contributors names & positions not published for consultation draft)				Organisation	Affected by erosion	Main Issues	Future Management	Defences Impact?	Defences Changes?
						sand dunes managing this defence.			
				Non-affiliated individual	-	Threat of Severn barrage being built to Minehead instead of W-s-M leading to overdevelopment of W. Somerset.	Minimal management consistent with prevention of inundation of Somerset Levels.	-	Concentrate on the most low-lying area between Brean and Hinckley with possible locking of Parrett river mouth.
				Bossington Farm	Part of the farm is flooded on spring tides.	-	Should allow more managed retreat.	Existing defences may have worsened erosion in other stretches of the coastline.	Abandon defences were the cost benefit analysis does not warrant continuing maintenance.
				Eden Resource Management	Our business is involved in construction management and therefore we deal with development feasibility appraisals, the formal aspects of securing planning and building control consents, etc and ensuring the subsequent completion of development on the ground.	1) Holistic approach to landscape character, ecological importance and flood 'management' - stepping away from ethos of flood 'defence'. 2) Greater recognition of realistic (as opposed to theoretical) risks/implications of flood events. Clarity in identification of no-build zones and specific standing advice on design for construction in those areas subject to different levels of assessed risk.	1) Recognition of need to allow flooding to happen but in a managed fashion - allowing the environment to breathe and not be controlled. 2) Formal adoption of standing advice in design codes for areas at risk.	Undue focus on engineered defence against any incursion, instead of managing impact of events and easing speed of recovery, has damaged environmental quality of our coastline and pushed more extreme flood effect elsewhere along the coastline.	Opening up of areas to use for flood capacity. This would have impact on the eco-system but may bring great benefit to areas of relatively sterile and poor quality farmland by recreating more natural habitats, particularly for marine birds.
				South West Way Association	The breach in the shingle bank at Porlock caused a major realignment of the official route of the SW coast path national trail.	Management of the SW coast path to maintain an excellent coastal experience for walkers.	Management of the SW coast path to maintain an excellent coastal experience for walkers.	To allow nature to take its course was a good decision for the Porlock breach.	-
				Somerset Drainage Boards Consortium	We are a Consortium of Drainage Boards and are a Statutory Public Body with Responsibility for flood Protection, Land Drainage and the Environment.	Flood Risk Management and Environmental.	As above	As above	As above
				The National Trust	Land owner along the North Devon & Somerset coast. Owner of built property which will be affected by sea level rise. Currently working with natural processes on managed retreat. 2ND SUBMISSION: Yes - coastal erosion has had an impact on our property in Porlock Bay where we are working with natural processes following a breach of the shingle ridge in the mid 90's. Other areas under NT ownership are hard coast and erosion or flooding are not a real issue.	Working with natural processes and the how we adapt to sea level rise. 2ND SUBMISSION: We would like to see and encourage, where appropriate that natural processes of managed retreat are considered as a way of managing our coastline over the next 100 years due to sea level rise.	Work with natural processes to accommodate sea level rise where appropriate. 2ND SUBMISSION: Work with natural processes where possible and encourage the positive management benefits of managed retreat.	Hard defences do impact on natural coastal processes, they impact on landscape and historic features and prevent natural establishment of wildlife ecosystems. 2ND SUBMISSION: There is evidence to suggest that hard sea defences do impact on natural coastal change, very often moving a problem along the coast line to another area. They also compound the problem of erosion where they meet soft and natural coastline. Sediment flow can be displaced by hard fences. Visually hard defences produce a physical barrier to natural change and produce a harsh and artificial line around our coast.	We would support working with natural processes of sea level rise where possible and identify land appropriate for future flood relief. We would suggest looking at which hard defences could be removed now and natural habitats being re-established. 2ND SUBMISSION: Where the impact of working with natural processes does not threaten life or significant populated areas then managed retreat is a real option to increase biodiversity, improve coastal habitats, enrich our environment for those living or visiting it.
				Non-affiliated individual	-	Preservation of land (an increasingly valuable asset).	Preservation of land (an increasingly valuable asset).	Depends on each situation.	A more realistic attitude to the preservation of land.
				Somerset Drainage Boards Consortium	Any coastal flooding would place debris and rubbish into watercourses that would require removal by the Internal Drainage	Management of soft and mobile defences, e.g. Steart and Dunster Marsh shingle ridges. Management of earth embankments.	Adequate crest levels and ability to remain stable in over topping events.	Parrett estuary mouth at Steart Point and Burnham. Processes need to be better understood. Beach lowering at Burnham is an	Prohibit any and all development in area behind defences where set back could be an option.

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					Boards. 1981 and 1990 events.			issue.	
				Adventure Schools (Skern Lodge)	Not at present but if the prediction of a 1m+ rise in sea level then yes. Constant attention needed to monitor high tides.	Protection of existing shoreline. Management very good at present. Would opt for the 'hold existing line' option.	Protection of existing shoreline. Management very good at present. Would opt for the 'hold existing line' option.	In this area (Taw Torridge estuary) defences have had a good impact on the towns/villages previously affected. No change to most of rest of the coast.	Keep an eye on/make plans for the 'gap' between Appledore Quay and the pebble ridge - an obvious weak area.
				Bideford Amateur Rowing Club	Before the Bideford Quay flood defences were completed our boat house was flooded on high spring tides.	If the Northam Burrows are allowed to flood over the waves running into the Taw Torridge would increase the height of the rivers on spring tides which would flood low lying areas of the two rivers.	Northern Burrows needs to be protected against flooding, or the sand dunes will be washed away on the Braunton Burrows in no time. That area is only sand.	-	-
				Fremington Army Training Camp	Probably not, but MOD do have a shoreline adjacent to Fremington Quay. Braunton Burrows training area, which is the southern two thirds of Braunton Burrows is leased from Christie Estates.	Retention of the MOD land at the west of Fremington Quay. Retention of this land owned by the Christie Estate over which MOD has training rights.	Maintenance of the status quo.	-	-
				Rolle Canal Society	Our major project is the restoration of the Sea Lock where the Rolle Canal joins the River Torridge at Landcross, Bideford (SS 458 233). This is in the upper tidal reaches of the Torridge Estuary and when restored the lock will prevent high tides entering the canal basin and retain fresh water in the basin at low tides. Exceptional spring tides (not every year) can inundate the whole site and adjacent riverside meadows and salt marshes. At present this is predictable and can be accommodated. Rising sea levels could present further problems.	Our main concerns are that coastline management should not have any detrimental effect on the tidal regimes in the upper estuary, the navigation channels in the estuary or flood levels due to inland precipitation. Suggestions of a tidal barrage across the estuary mouth would need wide consultation. There are serious ecological concerns, but there could be navigational/recreational/economic advantages for the Rolle Canal.	-	Major flood prevention works to protect Weare Giffard parish, comprising the building of earth flood banks alongside the river at about 1993, destroyed much early C19 industrial archaeological heritage associated with Annery Kilns, docks and shipyard adjacent to the Rolle Canal Sea Lock. The village street still floods to considerable depth when the river is in spate.	See notes above on proposed tidal barrage.
				Taw Torridge Nets	No	All, but to hold the existing defence line as much as possible for all concerned.	-	-	-
				<i>Non-affiliated individual</i>	Being a water and environment systems and flooding engineer/analyst and now consultant am interested in all events.	Sustainability of environment and economic management WITHOUT EXCESS housing or industrial exploitation.	Flood management. Either protection or managed retreat. Environment protection. Economic and social regeneration. Coastal renewable energy generation. Sustainable tourism.	-	Defences should be sustainable and justifiable, individually and collectively, i.e.. protection 'v' managed retreat.
				Lyn & Exmoor Vision	Lynmouth was historically devastated by a flood in 1952. However, presently the threat comes from the sea. Sea-front premises are regularly flooded or threatened with flooding when spring tides coincide with strong Westerly winds.	Lynmouth's historic built environment needs to be protected from damage by the sea.	The inadequate sea defences in Lynmouth need to be improved.	There was at one time more sand on Blacklands Beach to the East of the river mouth. Probably the amount of shingle and debris deposited during and after the 1952 flood accounts for this.	A well planned and effective sea wall at Lynmouth could measurably enhance the sea front, as well as providing protection for the community.
				National Farmers	Cover farmer members across	Erosion, flooding, damaged re-	Evidence based, voluntary	-	-

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				Union	the whole management plan area that have been effected by coastal issues.	alignment, upstream effects of coastal actions.	approaches.		
				Westward Ho! & District Residents Association	Yes. The pebble ridge was recently breached in 2 separate areas and Northam Burrows was partially flooded. Residents homes and local businesses are at risk of flooding as a result (correspondence sent to this effect). Photographic evidence available.	Residents would like to see the pebble ridge properly maintained and improved flood defences put in place to protect homes and businesses. We have never received any information as an Association informing us of what action is being taken and by whom.	A proper plan should be put into place if it has not already been done, with all appropriate agencies involved and all communities and community groups advised.	The pebble ridge has effectively protected our village and Northam Burrows for approximately the past 300 years.	Something needs to be done to continue to provide adequate protection and to have a plan that EVERYONE is aware of with info to every home in affected communities.
				Somerset Archaeological and Natural History Society	-	-	To avoid widespread flooding of central Somerset due to global warming and rise in sea levels. To consolidate existing defences but not necessarily build new as this just transfers the problem. Enhance the existing inland waterways to avoid flooding behind defences.	Many of the coastal defences (particularly to east of river Parrett) are Roman in origin and consolidated in middle ages in order to reclaim much of the levels and moors. SANHS would expect due respect to and recording of features should there be widespread changes.	Do not feel qualified to comment. SANHS is involved in natural history as well as archaeological and would be concerned at any plans that affected the unique, rich and diverse flora and fauna of the Somerset coastline.
				The North Devon Archaeological Society	Yes, in that 'no intervention' will erode and destroy existing and revealed archaeological sites. A prehistoric surface was recently revealed at the northern end of Northam Burrows.	If the pebble ridge is not maintained, scouring and erosion will reveal and disturb known and unknown sites. A number of Mesolithic finds have been made in the Burrows for instance.	Preferably the maintenance of the status quo.	-	Hold the existing line by maintaining the pebble ridge is a relatively easy process compared to defying the considerable erosion on the SE coasts etc.
				Exmoor National Park Authority	-	-	See National Park Management Plan.	-	-
				Northam Burrows 1716 Committee	Yes. Preservation of Northam Burrows and Grazing Common.	Yes. Torridge District Council are responsible for Coastal Management and protection. In the last two winters there has been increasing damage to the Pebble Ridge and sand dunes, with overtopping by the sea.	Maintain Grazing and future protection. Representation as inheritors of the original Commons Committee (1716).	-	-
				Parkin Estates Limited	Company owns part of Woolacombe beach and adjacent car parks.	We are concerned regarding dredging and its impact on the beach.	-	-	-
				<i>Non-affiliated individual</i>	-	In Combe Martin the coastline is not managed. The owners of the beach and surrounding area, the Combe Martin Parish Council, have no money.	Repair of sea shore, repair of Victorian pathways, paint all pre painted surfaces, tidy all areas and cut all shrubs down. A long term plan is required and costings and finance need to be available. Repair of sea shore, repair of Victorian buildings, paint all pre painted surfaces, tidy all areas. A long term plan is required and costings and finance need to be available.	Used to be very attractive but is in disrepair now. An asset that must not be lost.	Maintaining existing defences, weir, sand cannot be in the hands of a near banking organisation, the Combe Martin Parish Council.

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				Lillycombe Estate	Yes. 1) Potential loss of garden land of estate cottage. 2) Instability of steep wooded area over which estate holds sporting rights. 3) Indirectly if public rights of way or coastal access are displaced.	An absence of a coastal erosion plan or management; poor understanding of land management implications of coastal erosion.	1) Ability of land managers to adjust their activities or to carry out defensive work as a matter of right. 2) That where there is an overriding public interest issue (e.g. rights of way) the public purse meets a due proportion of any costs and does not simply get put on to private land owners/managers.	-	A joined up policy as a holistic approach to sea defences across all relevant government agencies and local authorities would be helpful.
				Western Power Distribution (South West) Plc	Yes, critically in some locations. We have a number of high voltage substations located in coastal proximity (and are in discussion with EA over flood depth level information). Some are major nodes and loss due to coastal inundation would have a very severe impact on community and have a wider geographic impact than just flood area.	Ongoing maintenance at least and improvement in some locations where critical infrastructure is at 1/1000 year risk. To be subject to a much improved cost benefit assessment regime than currently employed by EA (Pitt review may eventually clarify this issue).	No increased risk to critical infrastructure and preferably reduced risk, taking into account climate change.	-	As a minimum maintenance to avoid increased risk to critical infrastructure and preferably improvement to reduce risk.
				Christies	Yes	Dredge the Torridge estuary.	Conserve it.	Silting up of estuary and loss of moorings.	Create a marina at Instow to replace lost moorings and to enhance the ugly appearance of the sea defences. Very little effort was made in terms of aesthetics compared to other locations.
				The Crown Estate	-	-	Sustainable approach taking into account plans of neighbouring regions and the research of the Intergovernmental Panel on Climate Change.	-	-
				<i>Non-affiliated individual</i>	-	-	We have been aware of the erosion of the headland and cliffs bordering the Holdstone Common for many years and hope that the SMP could control and limit any further movement in order to preserve the natural beauty if this unique area.	-	-
				<i>Non-affiliated individual</i>					
				<i>Non-affiliated individual</i>					
				<i>Non-affiliated individual</i>	No - high level land.	No man made structures. Use natural materials (subject to cost).	To maintain the natural look.	Where defences are required, try to install imported rock to form natural breakwaters and to slow down erosion rate. This is expensive but would not have any impact on the natural environment.	Where defences are required, try to install imported rock to form natural breakwaters and to slow down erosion rate. This is expensive but would not have any impact on the natural environment.
				<i>Non-affiliated individual</i>	SEE SEPARATE LETTER. Yes - agricultural land subject to	Sensible protection of both agricultural land and property in	Monitoring at this stage changes in both flood water and tidal	The tidal defences for both Barnstaple and Bideford Bay have	-

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					flooding and tidal defences.	coastal areas.	levels.	been a success.	
				Croyde Bay Cottages	Could be if there was further serious and significant land erosion.	Erosion of the cliff face.	Safeguarding of further erosion of cliff face which impacts on the South West Coast Path	There is little evidence of a management plan.	There are no coastal defences as such. As landowners of the land (inclusive of the coastal path) we would not be happy to continue to provide further land on a regular basis to help provide a safety buffer at our expense.
				Marsh Inspectors	Yes - if breaching of banks occurs. This has occurred in 1900 and 1910.	Full maintenance of coastline defences.	-	-	-
				<i>Non-affiliated individual</i>	Yes - I've got land at Barunton Marshes.	The up keeping of all river banks.	No objections.	Some defences are deteriorating.	-
				Saunton Golf Club Limited	Yes. Being a golf club the threat of flooding would seriously affect business though this has not happened for many years.	Prevention of erosion of the Saunton dune system.	No objectives.	Some defences are deteriorating.	-
				British Energy	We own and operate the eight more modern civil nuclear power stations in the UK. All are on the coast. One of these is Hinkley Point B. We also have a declared interest in developing further plant locally as Hinkley Point C.	Resolving the potential conflicts between development interests and conservation interests and other local pressures.	Long term sustainable development at and around the Hinkley Power Station site.	Although the Hinkley sites coastal protection measures have intruded onto the upper shore historically their influence on neighbouring interests would appear to have been neutral.	A Hinkley C operation would require coastal defence measures fronting the existing soft cliff line - current studies are investigating the degree of need required.
				M & R Hicks Leisure Ltd	Risk of flooding to both farm and holiday business. No record of coastal flooding in 100 years.	Do not believe coastline is managed.	Protection of business. Sedgemoor planning/EA to understand likelihood of flooding.	Existing defences appear to have made winners and losers due to sand dune movement.	Understanding impact on sand dunes. Understanding impact due to dredging. Understanding impact due to possible barrage.
				M & R Hicks Leisure Ltd	Risk of flooding to both farm and holiday business. No record of coastal flooding.	Do not believe coastline is managed.	Protection of business, Sedgemoor planning/EA to understand likelihood of flooding.	Existing defences appear to have made winners and losers due to sand dune movement.	Understanding impact on sand dunes/dredging and possible barrage.
				Coastal Concern Action Group	Coastal erosion leading to loss of property now and in the future.	-	The question of 'Social Justice'/Adaptive Toolkit be fully addressed.	-	-
				Devon County Council	Stakeholder network - stakeholders have and will be affected.	Presentation of options at stakeholder events that keeps the process open, clear and inclusive.	That it is managed!	-	Greater acceptance of natural processes.
				Environment Agency	Hope to ensure better links with this and the SW Observatory	Over to you on this.	Improved awareness.	-	-
				Somerset Local Authorities' Civil Contingencies Unit	SLACCU maintains the multi-agency flood warning and response plans for Somerset as part of the Avon & Somerset Local Resilience Multi-Agency Flood Plan.	How the maintenance or otherwise of existing coastal sea defences will be undertaken in future years as this will have a direct bearing on the response to coastal flooding events.	None	Only as it affects the provision of future flood defences around Hinkley Point Nuclear Sites.	None
				Northern Devon Healthcare Trust	Not really - hospital and my home well above sea level.	Inland flooding is caused by failure to regularly clear out rivers and waterways - debris stayed above Barnstaple bridge for years. Prisoner work parties from Exeter could be used to clear rivers of those on unemployment	Clear the rivers and waterways. Dredge out Taw and Torridge to maintain navigation and allow ferry to Ilfracombe/Bideford and even South Wales.	-	-

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						benefit.			
				Free Enterprises Group	No previous flooding but have premises on harbour front. Also have interest as officer of two local and regional Chambers of Trade.	Erosion. Nothing really being done.	-	Very little defence here.	-
				Somerset County Council	The work of the tourism team would be affected in that the tourism 'offering' could be adversely affected.	Joined-up communications - there is confusion (or even complete ignorance) amongst the businesses potentially affected by flooding/erosion, partly because there seems to be so many different public bodies involved.	To assist with spreading reliable information, both to the tourism businesses and to the general public.	-	-
				Burnham & Highbridge Town Council	The proximity of the town to the coastal shoreline gives the risk of coastal flooding and erosion. The floods in 1983 resulted in improved sea wall defences being built.	1) Intensive development in the area. 2) The Severn Barrage and its effects. Most of Burnham is mostly above the... ??	Leisure and Open Air activities. Conservation of Wild-life habitat. Control and maintain at the lowest level any possible coast line development & building.	The Sea Wall is an integral part of the sea front and the Town Council have invested in enhancing and maintaining the Esplanade.	Better warning system when bad weather coincides with high tide.
				Torrige District Council	Yes, the Northam Burrows is under serious threat of flooding due to the erosion of the Pebble ridge.	I would like the SMP to continue in the same way that TDC have been doing for easily the past 2 to 3 decades with the repair plan thus complying with the Coastal defence plan.	To work in conjunction with this important project that everything that can be done with regards to Coastal Defence is done and the SMP is assisted through the DEFRA Coast Protection Scheme.	We all know that Mother Nature will always win, but by continuing with what we can do with regards to Coastal Protection as depicted in the DEFRA Coast protection scheme we are at least trying to conduct some defence to the constant erosion that we are never going to prevent.	I could quote all that Professor Pethick said in his address at Edgehill College followed by his presentation at the Torrige Council, after all he is the academic best qualified to give serious views that are well founded for coastal defence.
				West Somerset District Council / Taunton & Minehead Rail Link Co.	SEE SEPARATE LETTER.	I believe that the government paid for Minehead's sea wall. Otherwise only the brushwood groynes at the Hut/homes have been provided.	-	-	-
				Berrow Parish Council	Yes. The last large flood was in 1981 when much damage was done to properties.	The maintenance of the dune system. This is Berrow's only sea defence and extremely important. The existing defence line must be maintained.	-	-	The dunes are constantly changing and must be monitored to ensure that they are adequate for the job which they must do. The existing defence line must be maintained.
				West Somerset Railway Plc	Yes - the Railway runs from Bishops Lydeard near Taunton to Minehead on the West Somerset coast. It runs close to the coastline between Minehead, Dunster and Blue Anchor, and again between Watchet and Doniford. Ground level at the station and along the railway formation at Minehead is below the level that local development sites are now filled to so that in the event of over topping or bypassing of the existing sea defences flooding would be inevitable. Between Watchet and Doniford the line is	Regular review of the likely effects of the increase in sea level on the area between Minehead and Doniford, and additional cliff foot protection at Doniford to reduce the risk of future cliff erosion.	-	-	-

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					<p>very close to</p> <p>the cliff top where erosion has occurred in the past. The Railway worked with the Environment Agency to transport stone for cliff foot protection for part of this area, but further cliff erosion is now occurring near to Doniford Road Bridge and movement of the cliff top was observed last year. Significant further erosion here would lead to the risk of having to reroute or close both the line and the adjacent public road. Rerouting would be very difficult and expensive.</p>				
				Wessex Water	Yes	Water company.	Understanding implications of coastal change on company assets.	Yes	
				Colin Brown Environmental Ltd	No	-	-	-	No

Annex B.3 – Stakeholder Comments during SMP Development

The following presents the comments provided by stakeholders during the development of the SMP, largely made following the first Elected Members Forum (October 2008) and the first round of Key Stakeholder Forums (January 2009). These events sought views on the features, issues and objectives to be considered by the SMP and the possible policy options to be appraised.

Organisation/Address	Comment(s)	Response/Action
Natural England (Devon)	<p>Under Scenario A comments column. Reference is made to MR and involve action to repair breaches in Pebble Ridge. Suggest change of language here as repair could imply importing of material to build defences etc. Suggest emphasise managing change (e.g. breaches) so as to work with coastal processes rather than repair.</p> <p>What is meant by Scenario A comment regarding Crow Point that states 'MR at Crow Point controls movement of feature into the estuary'?</p> <p>What is the rationale for difference between SMPI policy and suggested policy under Scenario A where there is a move from for example from 'Retreat' to HTL or 'Do nothing' to HTL. I assume it is the CFMP that is setting these suggested changes from SMPI in Scenario A - but I would be interested to know on what basis this decision has been made. Some general comments:-</p> <p>What is the rationale for deciding on a change of policy when moving through the 3 specified time frames? For example, going from 0-20 year MR to 20-50 year NAI.</p> <p>In developing these Scenarios has any consideration been given to energy generation projects that are currently being developed in the Severn Estuary and potential impact on this section of coast?</p>	<p>Comment noted - the detail of how policies would be implemented is yet to be thought through. At this stage we are just seeking views on what policies to appraise.</p> <p>Rather than letting it just be pushed back continuously, intervention could occur to ensure that as it does roll back, it maintains its form and so continues to provide a defence function to inner parts of the estuary.</p> <p>This is just Scenario A, where we took the CFMP policy as a start point. We are still proposing to appraise the SMPI policies as MR/NAI under policy scenarios B and C.</p> <p>MR in short term to control risk whilst assets relocated, then allowing nature to take over entirely.</p> <p>No - have been advised that SMP is not to consider the Severn Barrage (or any other options), but to consider the existing coastline only.</p>
Sedgemoor DC	<p>We are somewhat surprised to be asked to comment on this in advance of “Baseline Process Understanding”, but doing so will perhaps also help focus review of that material. Please consider comments below very carefully prior to stakeholder engagement.</p> <p>In particular we have concern about the proposals for managed realignment affecting the Brean area through Units 11.11 / 11.12 / 12.2.</p> <p>We must assume from the options presented that the dunes at Brean are regarded as likely to erode within the next 20 years if left to natural processes (scenario B). If that really is the case then we and the public (particularly property owners and businesses) need to be carefully introduced to this rather surprising threat.</p> <p>We suspect that there is an error in the chart at Scenario C and that it is Unit 11.11 (Brean village) that should be showing as “HTL” rather than Unit 11.12 – if this is an error then it must be corrected before going public. If it is not an error then standby for a lot of concern from residents and businesses.</p> <p>Why would Scenario A for unit 12.2 involve HTL in all epochs if Unit 11.12 is facing MR in the medium and long term? [These units affect broadly the same area of land south of Brean Down].</p> <p>Why is Scenario C blank for Unit 12?</p> <p>Given that Unit 11.8 (Dunball to River Brue) is primarily farmland, why is MR so readily anticipated at Brean in all scenarios when Unit 11.8 has HTL in through to the long term in Scenarios A and C? [Residents and tourism businesses at Brean would rightly query why farmland is given apparent priority over their territory].</p> <p>If dunes at Brean are considered likely to erode how can you be sure that at Berrow Dunes (Unit 11.10) NAI is the appropriate policy through all 3 epochs in all 3 scenarios? – if there is no equivalent to the previous “observe and monitor” does text at least need to recognise a need for the line to be monitored at Berrow Dunes.</p> <p>In the blue line of text in the key at the top of the table “best” should presumably be “based”.</p>	<p>We have brought this forward in the SMP process at the request of the CDG in order to provide additional time later on to meet the March 2010 deadline.</p> <p>We fully intend to present these initial thoughts in the terms of very initial thinking in advance of the Stage 2 studies being completed, but allowing stakeholders to give their thoughts at this stage such that we capture their views on the future of the shoreline.</p> <p>We will develop these options to test further based on this engagement process and the continued development of the understanding from the Stage 2 studies.</p> <p>It is a possibility, but this will be guided by the processes appraisal once it is completed (which at this stage it is not).</p> <p>Yes, this is a typo - have corrected Scenario C to show HTL here as well. This is because A at 12.2 is based on direct translation of CFMP policy. Scenario B recognises this conflict hence MR for Scenario B which is also assessed as MR for 11.12.</p> <p>We have not identified alternative for C that would alter from A.</p> <p>We have developed them based on current (and still improving understanding) to guide the policy appraisal process. These are not set in stone but provide a start point for the appraisals rather than testing all 4 policy options at every bit of coast. HTL at 11.8 is from the CFMP.</p> <p>Requirements for monitoring will be considered during the later stages of the SMP when more detailed consideration as to 'how' policy options could be implemented is provided >> this will be better informed once the Stage 2 assessments are completed.</p>

Organisation/Address	Comment(s)	Response/Action
Environment Agency	<p>It would be really useful to see maps illustrating exactly where each unit is, with the policy options on them. Will these be made available and when?</p> <p>Description of Scenario a - change 'best' to 'based'?</p> <p>Policy units 6-1 and 6-3 - would it best to split this up, so that there are separate units for the hold and do nothing sections?</p> <p>Policy units 12-2 to 12-5 - would it best to split this up, so that there are separate units for the hold and locally retreat sections?</p> <p>If the Scenario B and C options are not changing it may be clearer to leave all these boxes blank, rather than having some blank and some filled in. What is the reason for this difference?</p>	<p>Maps not planned to be produced yet, as Policy Units likely to change repeatedly and are not officially defined until the end of the Policy Appraisal process.</p> <p>Noted</p> <p>Agreed - split units.</p> <p>No, the policy would be to retreat in local areas within this unit. These would need to be identified through more detailed study.</p> <p>Have included in full as they need to be assessed in full as scenarios for the whole coast. Have highlighted where options are changed from A in both B and C to make it clearer.</p>
National Trust (Somerset)	<p>at Porlock (Bossington) the NT have a policy of working with natural processes which in our minds means no active intervention and not Managed retreat. We understand managed retreat to be the control over sea level rise in a phased manner which is what happens in the other half of Porlock Bay using earth bunds to prevent the sea from entering certain fields. The sea on NT land just comes in and finds it's own level.</p>	<p>Amended understanding in Issues & Objectives and policy options summary to reflect comment.</p>
Member of Royal North Devon Golf Club	<p>estimated in 2008 to be around £400,000 mainly in hotels and B&Bs etc.</p> <p>Surely a temporary solution is needed to give us time to re-design two new holes (i.e. recharging the ridge). If we lost the 7th and 8th which is possible, we no longer have a viable golf course. Torridge Council have yearly rent of £38,000, so as our landlords should be addressing this with yourselves.</p>	<p>Comments noted and to be considered in policy appraisals.</p> <p>Options to test consider HTL and MR in this area.</p>
Lyn and Exmoor Vision	<p>I must point out that improving sea defences (Holding the Line) at Lynmouth is a priority. For years, properties in Lynmouth have been subjected to flooding on a regular basis at high tides.</p> <p>With the prospect of sea level change, the present sea defences will rapidly become completely inadequate.</p>	<p>Comments noted and to be considered in policy appraisals. Only HTL is considered to test at Lynmouth.</p>
The Clovelly Estate Company Ltd	<p>We are reassured to note the policy for Clovelly is 'Hold the Line'</p> <p>We believe the harbour wall is vital to the protection of the nationally important village. We are concerned that if sea levels rise significantly, and weather patterns become stormier, the existing sea wall will neither be high nor strong enough to withstand the battering from waves.</p> <p>We look forward to discussing with you what steps may be planned for to mitigate the effect of this through action to the seawall defence.</p>	<p>Comments noted and to be considered in policy appraisals.</p>
Somerset County Council (Highways)	<p>Area around Blue Anchor Seawall is subject to landslip from geological fault and also erosion. This threatens the existence of the public highway in this area.</p> <p>Note option is 'No Active Intervention'</p>	<p>Comments noted. HTL is considered in Scenario C, along with consideration of where the boundary between the HTL section at Blue Anchor and NAI section between Blue Anchor and Watchet should be located.</p>

Organisation/Address	Comment(s)	Response/Action
<i>Non-affiliated Individual</i>	<p>At Burnham-on-Sea, there appears to be some weakness in the height of tidal defences (against tidal surges and predicted sea level rise), at the northern end of the esplanade defence wall at the flood gates, which is lower than adjacent defences.</p> <p>Also, at southern end of this wall, the defence level lowers compared to the main wall, and also has a break in it.</p> <p>Dunes north of Burnham through Berrow and Brean have been strengthened in places by planting of buckthorn. To improve the situation here would surely be the cheapest form of defence possible (i.e. more widespread dune planting). This has been done by volunteers in the past, but perhaps local authorities could provide funds as way of supporting tourism industry.</p> <p>If land is given up to the sea between Burnham and Bridgwater, need to consider impacts on Railway and M5 (major transport links) as well as considering emergency evacuation routes.</p> <p>If land is to be allowed to return to the sea in a managed way, there needs to be compensation to those who will be made homeless.</p>	<p>Comments noted and to be considered in policy appraisals.</p> <p>Have included HTL for 'Berrow Dunes' in the options to test.</p>
Environment Agency	<p><i>relaying comments from discussion with EDF Energy (owners of Hinkley Point):</i></p> <p>One of the issues faced by EDF is looking at the need for a new highway link between the motorway (Dunball) and Cannington. This could form the line of a set-back flood defence for Bridgwater. Somerset CC have no objection in principle to a proposed highway embankment also acting as a flood defence. Route options should be known by April 2009</p>	<p>Comments noted, although Environment Agency's Parrett Estuary Strategy states that the best option in this area is HTL.</p>
Environment Agency	<p>11.1 Hinkley Point Currently EDF have taken over British Energy. They anticipate constructing 2 new units over a 7 year construction period. May require upgrade to Comwich Wharf, or new Roll on - roll Off facility at Hinkley Point for construction traffic/ material. Possible alternative may be a new east west link road from Dunball to Cannington.</p> <p>11.2 Hinkley Point to Stolford Managed realignment, but need to consider National Grid infrastructure that runs through this site. (Pylons - may be upgraded with new stations)</p> <p>11.4 - 11.8 Fenning Island to River Brue Tidal Barrier proposed at Bridgwater to be delivered via LDF (Development). This, in conjunction with a possible new east - west raised highway link between Dunball and Cannington could be tested as a possible MR.</p> <p>11.12 Brean Village to Brean Down Current proposal by caravan site owners to improve their tourism offer - possible 'Centre Parks' type units. Possible option to test is provision of counter bank around tourism offer to cater for climate change impacts, managed and operated by landowners.</p> <p>12.3 Axe Estuary East Bank Same comments as 11.12</p> <p>12.6 Weston Current upgrade to existing tidal defences. Significant planned regeneration to sea front, including Tropicana site, Weston pier, Birnbeck Island - see Weston Vision All these sites extend into estuary.</p>	<p>Comments noted and to be considered in policy appraisals.</p>

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<p>Minehead and District Chamber of Trade and Commerce</p>	<p>I am most concerned with the Policy Area 9:2 and 9:3. To me the two should not be seen in isolation, otherwise you adopt the school boys strategy on a beach where he tries to build a wall in front of his castle on the beach. The sea actually comes round the back.</p> <p>We are talking about a high tide together with a surge. These rarely happen at the same time, but I have personally witnessed big surges when the high tides have been low during winter months. I have the infra red satellite photos and I am aware that the Environment Agency are pinning their hopes at the Warren end of Minehead, that old beach heads from ancient times, now part of the golf course, are being considered able to keep the surges of the future from encroaching very far if the Warren to Dunster area is breached. My concerns and those raised by the Golf Club and Dunster Beach are consistent and right.</p> <p>In the bigger scheme of things it is easy to airbrush through an area of national insignificance, but you asked our opinion and this is mine.</p> <p>If any consideration is made to manage retreat to the east of Minehead it will be expensive. It will have to be tackled as a whole. The land at risk behind the beach head through the present dyke system will be able to contain to degree, the flood risk from rain run off, but will be under severe threat from "back door" encroachment from the sea. The cumulative affects of recent building developments to the West and South of Butlins on the floodplain will result in a reduction of available land to accommodate the water. Butlins, The Station and the Mart Road Industrial Estate will become the most vulnerable, followed by Station Terrace and Glenmore Road behind Minehead's seafront. The speed of ingress will be helped by the current dyke system behind Butlins.</p> <p>It is imperative that the school boy tactics currently being used to push round boulders and sand up the beach just beyond the 18th tee, are seen as merely cosmetic. That sort of defence would go in one night as you know from the Porlock experience.</p> <p>Am I making some sense? We are about to receive another multi million pound application for land development on another flood risk area behind the Station. I will be interested in what the Environment Dept have to say.</p>	<p>Comment noted - though have kept as separate units as may wish to manage in different ways. Appraisal of options considers the combined impacts of policy in one area upon other adjacent areas.</p> <p>Comments about how to MR east of Minehead noted and form part of the consideration of policy options appraisals.</p>
<p>Environment Agency</p>	<p>A range of comments provided marked up on the 'draft policy options to test' tables.</p>	<p>NB: Reviewed these comments directly from table provided.</p> <p>Comments re ATL instead of HTL not considered to be correct.</p> <p>Comments re. Scenario A where have directly interpreted CFMP policy seem to have been made without reference to scenarios B and C in the main, which already considers testing alternative policy options suggested by consultee. Have added additional B and C scenarios in some areas where consultee suggests consideration of alternatives should be made.</p>
<p>Braunton Marsh IDB</p>	<p>Flapped gate at Horsey Island at Braunton Pill is in need of repair. It continually ?ceases? To exclude the tidal waters into the marsh. This threatens erosion of the Great Seawall from ?? And poses a threat to seawater entering the Great Sluice into the Freshwater Drain of the ??? (as happened in 2007). Cattle rely on the drains for drinking.</p>	<p>Comments noted and considered in policy appraisal. Have also split Horsey Island out as its own unit to consider.</p>

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Dunster Beach Holidays Ltd	<p>As far as Dunster Beach Holidays is concerned, we do not feel that our site along with the Golf Course was covered in enough detail. Dunster Beach butts immediately onto the Golf Course, and runs to the end of Sea Lane, in all over a mile long.</p> <p>It seems that the management plan indicated that our stretch of coast was not to be held or protected, it was to be observed and monitored. In essence left off any future plans, which means that as the sea levels rise, would lose either part or the whole of the site which would be catastrophic. Not only for the beach hut owners but also for low-lying land that stretches out to Lower Marsh immediately behind our stretch of coastline.</p> <p>If our sea defences were breached the water would easily flood across the Golf Course and into Minehead from the backdoor, as well as filtering onto the marshes behind us, which include the West Somerset Railway Line and Lower Marsh itself. Therefore we think it is imperative that the Dunster Beach Coastline is Hold The Line in this section of the coastal plan.</p> <p>DBH Ltd have over the past 22 years installed groynes at it own expense (thousands of pounds) such that about 80% of the site is protected and has raised beach levels.</p>	<p>Comments noted and considered in policy appraisal. Have also split into a number of smaller units (rather than 'Warren Point to Ker Moor) to allow consideration of impacts on golf course and Dunster beach to be considered in more detail.</p>
<i>Non-affiliated Individual</i>	<p>Whilst I am not altogether surprised, I am a little disappointed with the negative tone of the Draft Policy Scenarios (January 2009) with the preponderance of 'HTL' 'Do Nothing' and 'Observe and Monitor' - all easy options that do not coincidentally? Or otherwise, cost very much money!</p> <p>I am alarmed, I have to say, at the number of 'Managed Realignment' indicated in Scenario B, the source of which is, I suspect, the malign influence of Natural England promoting their extreme and potentially dangerous hobby horse of 'Managed Retreat'. It is very sad that they appear to have exerted such influence.</p> <p>I note that Berrow Dunes (my particular concern) is shown as 'Observe & Monitor'. Given that this area of coast has, I understand' been 'observed & monitored' for a number of years, one is bound to ask for how much longer and what results are expected that aren't already showing at least a trend?</p> <p>This would be the 'least worse' option but I do wonder if any sort of contingency - or funding - has been allocated to this, or indeed any part, of the coastline should short term measures be required before it is all subjected to tidal flooding by 2060, as determined by Somerset County Council.</p> <p>I note that in Scenarios A B and C, as well as 'observing and monitoring' Berrow Dunes are to be subject to No Active Intervention, and I wonder if this should not read 'NAI unless circumstances change from the baseline position in 2009' otherwise it does look a lot like Natural England's #Managed Retreat' by the backdoor.</p>	<p>Managed Realignment is one of the four policy options we are obliged to consider where we believe it is realistic to do so.</p> <p>Other comments are noted and will be considered in the policy appraisal process.</p>
Berrow Parish Council	<p>My Council is disappointed that the plan shows that there is no active intervention intended for the Berrow Dunes in the next 100 years. It is felt that the current policy of observing and monitoring must be continued into the future with intervention to hold the defence line undertaken as and when required. It is also felt that Berrow Parish Council should receive the results of any observation/monitoring which is undertaken. As a Council, we are already concerned with the amount of coastal erosion which has occurred.</p>	<p>Comments noted and have added HTL as a policy option to appraise for this area.</p> <p>Monitoring is now undertaken as part of the South-West Regional Coastal Monitoring Programme, the information from which is freely available.</p>
Torrige District Council	<p>Westward Ho! to Saunton Down comments for Scenario A state 'Take action to increase the frequency of flooding'.</p>	<p>Yes, this is direct wording from the CMFP.</p>

Organisation/Address	Comment(s)	Response/Action
Devon Conservation Forum	<p>The Devon Conservation Forum has a countywide remit and tends not to concern itself with detailed issues affecting local communities unless there are countywide implications. In this context it is noted that the long-term scenarios all accept the UK generally accepted Met Office prediction of global warming. However prudent planning should envisage that long-term prediction is seldom correct when viewed in hindsight. There is a growing body of world scientific opinion that is positing global cooling in the northern hemisphere and citing factual evidence to support this thesis. This opinion does not come particularly from Western based scientific endeavour (excepting Denmark). The DCF, having insufficient knowledge, does not hold to any view but cautions that prudent planning should always consider alternatives. Sustainable planning means that options should be open to re-consideration if actual events start moving away from predicted events. The matter will become clearer by 2015 if Russian scientists are wrong in stating that the global temperature maximum has been reached on Earth.</p> <p>Upon this basis, the DCF note that little in the Draft Management Options will be aborted if global temperatures cool and sea levels do not rise as predicted.</p> <p>The Draft Management Options do not appear to have considered unusual situations to see if there is merit in any adjustment in those Options for events that have happened but cannot be predicted to happen. A case in point would be the 1607 flooding of the Bristol Channel. The most recent theory is that the flood was the result of a tsunami wave, which had a devastating effect up the Bristol Channel and Severn Estuary. The inundation wave at Barnstaple “reached a maximum run up of 7.53 m OD, equivalent to a wave height of 1.83m.” “A field survey and published building surveys of the area affected by the wave suggest that no contemporary buildings remain, with oldest surviving buildings in those areas dating to 1627 and 1635 in Barnstaple, c. 1640 in Instow and c. 1750 in Appledore”. See Haslett and Bryant – 1607 coastal flood in Devon and Cornwall. Archaeology in the Severn Estuary 15 (2004) 81-89.</p> <p>Upon individual instances it is felt that the manner in which sediments build up and degrade in the complex marine and fresh water environment about the confluence of the Rivers Taw and Torridge and within Bideford Bay is still inadequately understood. Dredging in that area may well have caused the disappearance of Crow Point. A University of Exeter geologist predicted this against the accepted opinion of the 1970s. However the predicted long-term effects of inundation potential in the Taw and navigational hazards have not happened. Despite the extensive sea protection measures over the latter part of the 20th century, the recent loss of land at Westward Ho is indicative of how little the offshore drift and sediments movements are understood.</p> <p>Overall the DCF compliments the Advisory Group on the outcomes being achieved and does not feel any significant or material interests have been overlooked.</p>	<p>We are obliged to follow the current Defra climate change guidance from October 2006, although this is subject to change following publication of the latest UKCP report in spring 2009.</p> <p>The SMP policies will be reviewed periodically (likely about every 5 to 10 years) so policies may be amended at a later time in lieu of better information being available.</p> <p>Consideration of unusual situations as stated is made in the SMP, however it is not possible or realistic to provide long term policy based only on such infrequent events. Responses to such situations should also be made in the emergency plans for local authorities and are not to responsibility of the SMP.</p>
Taw Torridge Estuary Forum	<p>KEY CONSIDERATIONS These must include</p> <ul style="list-style-type: none"> a) how the various land uses of Northam Burrows, especially the landfill site are affected by the decisions made on the future management or otherwise of the pebble ridge, b) how and where the loss of saltmarsh habitat resulting from coastal squeeze can be compensated for, c) how other key facilities such as Ashford sewage works can be protected. d) the implications of developments proposed on the Taw flood plain in Barnstaple as outlined above, e) the effects of shoreline management on the deepwater channel to Appledore shipyard, the Port of Bideford and the oil terminal jetty at Yelland which may be reopened. f) the potential dangers of erosion at the old Yelland power station site. <p>In built up areas such as Barnstaple, Bideford and the smaller coastal/estuarine settlements there is no option but to hold the line. However, one must question the wisdom of developing further flood plain sites such as Seven Brethren in Barnstaple.</p> <p>Equally obviously key installations such as the Ashford sewage works need ongoing protection. Sources of potential pollution such as the Northam Burrows landfill site and the Yelland power station site also need protection unless the risk is removed by other means.</p> <p>Where conservation bodies such as RSPB (Islay Marsh) and Gaia Trust (Home Farm Marsh) are involved detailed consultation with them is essential. Similarly the Braunton Marsh Commissioners.</p>	<p>Comments noted and considered in policy appraisal.</p>

Organisation/Address	Comment(s)	Response/Action
<p><i>Non-affiliated Individual</i></p>	<p>Pebble Ridge:</p> <p>The dwellings at the Westward Ho! end of the Pebble Ridge must be protected</p> <p>There are only two options for the Disused Landfill Site – either to defend it or to remove it.</p> <p>Whilst this Disused Landfill Site remains at the Northern end of Northam Burrows, it MUST be defended.</p> <p>Failure to defend this site would result in enormous quantities of uncompacted household waste and contaminants polluting our beaches, coast and estuary, with all of the consequent impact on North Devon’s economy, tourism, environment, nature conservation, health, etc.</p> <p>Northam Burrows is a significant tourism, amenity and recreation resource</p> <p>The shelter afforded to Instow by the existence of Northam Burrows is of enormous significance in minimising flooding and erosion in a sizeable village.</p> <p>Please note: Professor John Pethick’s Study: Taw-Torridge Estuaries – Geomorphology and Management: DCC Report – Northam Burrows Disused Landfill Site: Skern Saltmarsh:</p> <p>Whilst the Disused Landfill Site remains, the access road defining the boundary of The Skern with Northam Burrows must also remain</p> <p>Instow:</p> <p>It is very important for Instow that Northam Burrows and Crow Point are protected. Without their protection, Instow would be open to considerable flooding and erosion</p> <p>Instow Beach was identified in Professor Pethick’s report on the Estuary as the tidal delta for the circulation of sediment within the Estuary.</p> <p>Please note: Professor John Pethick’s Study: Taw-Torridge Estuaries – Geomorphology and Management: River Caen to the White House :</p> <p>Braunton Marsh is a unique feature of North Devon, and requires particular attention. It has conservation, amenity, agricultural and conservation values and, together with Braunton Great Field, is being considered for inclusion in the North Devon Areas of Outstanding Natural Beauty designation.</p> <p>Braunton Marsh is protected by the original embankment (completed in 1815), which is now part of the Tarka Trail. The regulation of water levels on Braunton Marsh is overseen by the Braunton Marsh Inspectors and by the Braunton Marsh Internal Drainage Board.</p> <p>The enclosure of Horsey Island was the second stage of the reclamation of Braunton Marshes, which was completed in 1857. The protecting embankment is now part of the South West Coast Path</p> <p>Please Note: The Horsey Island section of this unit was the subject of considerable debate in the original version of the Shoreline Management Plan, and the Plan was eventually revised to the position of ‘Hold the Line’. This section is of such significance to the Estuary, that it should be considered under a section in its own right.</p> <p>Crow Point:</p> <p>Whatever the future of Crow Neck, the shelter given to Instow by the existence of Crow Point is of great importance.</p> <p>Instow is a significant village, and without the shelter afforded by Northam Burrows and Braunton Burrows, it would be subject to flooding and erosion.</p>	<p>Comments noted and considered in policy appraisal.</p> <p>Have split the 'Pebble Ridge' unit into smaller parts to reflect differences in northern and southern parts.</p> <p>Have split out Horsey Island as its own unit.</p> <p>Have added HTL as option to consider for Crow Point.</p>

Organisation/Address	Comment(s)	Response/Action
Environment Agency (NCPMS)	<p>Policy for Steart Village could be different to that for the land around it. Could have HTL at the village but MR for low-lying area behind.</p> <p>Why is MR for Stolford to Fenning Island shown in the initial starting point scenarios for year 50? How was the timing of the suggested change in policy chosen?</p> <p>Typo in scenario C comments for 'Hinkley Point to Brean Down' section - "Regulated tidal exchange in this area to create more intertidal habitat"</p>	<p>Have split out Steart Village as its own unit.</p> <p>Timing of policy options subject to change as go through the policy appraisal process. MR shown in initial table to indicate thinking that a move to wards MR in the medium to long term should be considered and appraised.</p> <p>Typo corrected.</p>
Rolle Canal & Northern Devon Waterways Society	<p>The RCNDWS does not take a view on the fate of Horsey Island and Braunton Marshes but supports the protection of Velator Quay as a heritage site and recreational facility.</p> <p>If the embankments of Horsey Island and Braunton Marshes were to be breached as part of a scheme of managed realignment and/or mitigation for saltmarsh loss through coastal squeeze, the embankments themselves and the historic Great Sluice (1811) and the Horsey Island Sluice (1853) should be safeguarded as long as possible as heritage features.</p> <p>Breaching at Horsey Island as part of MR would expose the historic (1810) inner embankment to wave erosion and it is claimed that the 1810 embankment no longer has its original stone protective facing. Breaching of the 1810 embankment would expose the whole of Braunton Marshes to inundation.</p>	<p>Horsey Island split out as own unit to consider.</p> <p>Comments noted and considered in policy appraisal.</p>
Minehead and West Somerset Golf Club	<p>We are just viable [as a business] at the moment. If we lost part of the course to the sea it would most likely mean the end of the golf course. It would not be attractive to members or visitors as a shortened golf course and would not be viable financially to remain in existence.</p> <p>We do our very best to protect what we have, and I would ask you to do the same by 'Holding the Line' from the Warren to Ker Moor. I have read and would endorse everything that Steve Pillbrow of Dunster Beach Holidays Ltd has said in his letter to you.</p>	<p>Have split out golf course and Dunster Beach holidays as separate units so can consider options for this whole section in more detail.</p>
Northam Burrows 1716 Committee	<p>We can see no actual management proposals in these plans. Our burning question is what is to be done about the landfill site? If the local authorities have no solutions will they consider proposals by local people? We believe that a local engineer has put forward his suggestions. Will he or anyone else be listened to?</p> <p>There is a growing feeling of frustration and despair that despite 'public consultation' the voice of the people is not being heard and that despite all the talking nothing is being done.</p> <p>We would remind you that in 1944 the American Army proposed building a 'levee' with a road from Westward Ho! slipway to Appledore Lifeboat Slip and that this was rejected.</p> <p>We would be interested to know what Natural England's proposals are and what help they are prepared to provide.</p>	<p>The issue of the landfill site is a key consideration for the development of SMP policy and will be considered in detail as part of this process. A specific meeting to discuss this is to be held in March 2009 with all parties to seek an agreed way forward.</p> <p>A 'levee' such as suggested could possibly form part of a Managed Realignment solution.</p>
Blue Anchor Hotel	<p>Concerned about 'Blue Anchor' being Hold the Line and 'Blue Anchor to Watchet' being 'No Active Intervention'.</p> <p>Need to consider extending the HTL boundary a little to the east to allow protection of the hotel.</p>	<p>The boundary between the area of HTL and NAI needs to be considered. Extension of the area of HTL a little to the east needs to be considered to protect the road that runs behind the property which would be at risk of erosion and need protecting even if the property was not there.</p> <p>Have combined the policy scenario areas from initial options to test tables to facilitate this.</p>
Environment Agency	<p>New Parrett Estuary Strategy has determined that HTL Policy on Parrett West to Combech is best option. This is partly on a cost-benefit grounds and also because set backs here increase flood levels in Bridgwater (modelled).</p>	<p>Comments noted and reflected in options to appraise tables.</p>
Retreat Caravan Park (NB: Berrow)	<p>Yes to HTL. But also consider landowners to undertake management protection of their dunes etc. You will note our management of the dunes from attached aerial photograph of mid 1950s to their current condition.</p>	<p>Added HTL as option to consider at Berrow Dunes.</p>

Organisation/Address	Comment(s)	Response/Action
EDF Development Company Ltd	<p>Provided various information to the SMP; points relevant to policy options to test are as follows:</p> <p>Proposed Foreshore Structures Foreshore structure design is at an early stage and 2 proposals being considered are (a) concrete walls that adopt the HTL approach; and (b) armoured structures that will involve some reclamation of the immediate area of foreshore from the toe of the cliffs. EDF are in discussion with Natural England about these.</p> <p>Sediment Dynamics EDF believe there is some uncertainty regarding sediment dynamic characteristics of the area and are not certain about the linkages around Hinkley Point</p> <p>Intake/Outfall Structures Arrangements need to be made for intake and outfall structures for cooling water.</p>	<p>Options for foreshore structures considered to both be HTL for the purpose of the SMP, although need further input from EDF regarding extent.</p> <p>Sediment transport around Hinkley Point relates to fine sediment only.</p> <p>Intake/outfalls, as noted in EDF comments, outside of remit of SMP, but note is made that some consideration of them is needed in terms of adjacent policy option.</p>
Porlock Parish Council	<p>Porlock Weir As the flooding here already appears to be getting worse and with die warnings of increasing sea level, little attention seems to be being paid to sea defences between Gore Point and Porlock Weir. It seems difficult to justify a policy of 'no action intended' for this part of the coast.</p> <p>Ridge & Saltmarsh The policy of managed retreat seems to have reverted to a policy of 'do nothing' as far as protection of agricultural land is concerned. The 'managed' appellation would appear more credible to the people of the Parish if this were apparent on the ground. It is obvious that as the sea level rises, more and more land will be flooded. It would be helpful to the local population if they could be given more information on the expected extent of future flooding and erosion and of any intended action to accommodate this. It is also important to be informed of intentions towards public rights of way particularly in respect of the financially very important SW Coast Path.</p>	<p>Added intervention option to test as part of the option appraisal between Gore Point and Porlock Weir.</p> <p>Added NAI to test alongside MR along the ridge and saltmarsh to determine which is more preferable.</p> <p>The South West Coast Path policy is to work with natural processes and seek to realign landwards as necessary, therefore it can not be used to justify defending an area.</p>

Annex B.4 – Stakeholder Comments relating to Policy Options

The table below presents the responses from all stakeholders to the initial draft preferred policies, which were presented at a series of three KSF events in July 2009 (refer to **Appendix F**). It provides the comments received from stakeholders and a summary of the actions taken to address the comments. This information was utilised to refine and confirm the preferred policy options presented in the consultation draft of the SMP (refer to **Appendix G** and the **main SMP document**).

Please note, individual contributors names and positions are not published in this consultation draft.

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
Ilfracombe Harbour Master					<p><i>(NB: following comments were sent (3rd Feb 09), but not received, in relation to January 2009 KSF - hence issues not yet factored into SMP process):</i></p> <p>I have significant concerns with the draft management options for Ilfracombe. Possible Policy Units 6.1, 6.2 and 6.3 refer.</p> <p>There is a clear and significant risk of flooding at the Harbour as on a high spring tide the sea level is only 18 inches below the main quay wall. Any waves or swell easily breach this today. With predicted sea level rises and changing weather patterns, businesses and property at Ilfracombe are at significant risk. I feel management options of HTL and NAI are inappropriate in this area.</p> <p>NDDC are currently working on plans to build a new commercial quay at Ilfracombe Harbour and the positioning of that quay is critical to the future of managing flood risk at Ilfracombe. This new construction itself is contrary to the NAI and HTL policies.</p> <p>I have been attempting to set up a meeting at the Harbour with EA officers for a little while now, to discuss our plans and the effect they will have on reducing the future risk of flooding at the Harbour. I am aware that your deadline is fast approaching and wish to raise this issue in anticipation of that meeting.</p> <p>My suggestion is to 'Managed Realignment' at Ilfracombe Harbour thereby protecting the Harbour and it's surrounds for future generations.</p>	Appraised localised ATL in part of Ilfracombe Harbour >> amended text to reflect this as being a way to achieve long term plan and should be supported by SMP if goes ahead.

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
Western Power Distribution					<p>Western Power Distribution (WPD) is the licensed electricity distribution company serving some 1.5 million customers across South West England and a further 1 million customers in South Wales.</p> <p>Following the SMP stakeholder meeting on 22nd January this year, I contacted you in respect of Halcrow's Draft Issues and Objectives Report dated January 2009, and expressed grave concern that although that document purported to have included electricity substations under an objective of "to ensure critical services remain operational" / "features covered", the only installation mentioned was Hinkley Point power station. We exchanged e-mails on 23, 30th January and on 3rd and 16th February. At that time I provided a detailed listing of major WPD substations that had been identified at risk of flooding by your "flood risk" colleagues at Exminster and Bridgwater.</p> <p>I attended the latest stakeholder event at Barnstaple last Thursday, when Halcrow's made available paper copies of Draft Policy Options Summaries for individual sections of coastline between Hartland Point and Anchor Head. Whilst these did contain some reference to some substations, there were a number of omissions; -</p> <ul style="list-style-type: none"> • notably to a major 132,000 volt substation at East Yelland serving over 40,000 homes and businesses across North Devon (there is an erroneous reference to an old Power Station site) • no reference to the numbers of homes, businesses or population served by the substations • no reference to instances where there were multiple substations affected in one section of the SMP study <p>Turning to specific comments –</p> <p>7c17 – Home Farm Marsh (Yelland to Fremington) Subject to safeguarding the major 132,000 / 33,000 volt substation at East Yelland WPD agree with the stated proposed policy of hold the line to 2025, managed realignment from 2025 and hold the line to 2015. WPD request that the Draft Options Summary wording be amended to remove reference to "the old Yelland Power Station", and include "Protection of the major 132,000/33,000 volt substation serving more than 40,000 homes and businesses in North Devon" (This is needed, even in the summary document, to communicate the scale of the infrastructure).</p> <p>7c21 – A39 Road Bridge to West Ashford (Barnstaple)</p> <p>WPD agree with the short, medium and long term proposed policy of hold the line. WPD request that the Draft Options Summary wording be amended to - "protection of three major electricity substations serving the following numbers of homes and businesses – Barnstaple 132,000/33,000 volt substation (28,000), Rock Park 33,000/11,000 volt substation (7,600) and Barnstaple Quay 33,000/11,000 volt substation (6,000)"</p>	<p>Ensure implications tables in full draft SMP pick up all of WPDs assets from information provided previously, and as per the comments here.</p> <p>Issue here likely due to only a summary of implications being issued for July 2009 KSFs, which did not contain every single implication that has been appraised (as this would have required a much larger document).</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
					<p>7d41 Bridgwater to Dunball</p> <p>WPD agree with the short, medium and long term proposed policy of hold the line. WPD request that the Draft Options Summary wording be amended to – “protection of multiple major electricity substations serving the following numbers of homes and businesses – Bridgwater 275,000/132,000 volt substation (89,000), Bridgwater 132,000/33,000 volt substation (62,000) and 33,000/11,000 volts substations at Colley Lane (12,500) Bath Road (9,000)</p> <p>7d43 Burnham on Sea, Highbridge and Berrow</p> <p>WPD agree with the short, medium and long term proposed policy of hold the line. WPD request that the Draft Options Summary wording be amended to – “protection of a 33,000/11,000 volt electricity substation at Burnham serving over 10,500 homes and businesses.</p> <p>7e06 Weston-Super-Mare</p> <p>WPD agree with the short, medium and long term proposed policy of hold the line. At present there is no mention of electricity substations at risk. “Protection of multiple major electricity substations serving the following numbers of homes and businesses - Weston 132,000/33,000 volt substation (47,000) and 33,000/11,000 volts substations at Lypstone Farm (17,000), Weston Locking Road (13,500) Bournville (6,300)</p> <p>(Government census returns for the councils served by WPD in the South West indicate a ratio of approximately 2 between population and numbers of homes and so the above numbers should be doubled if population impact is needed).</p> <p>In closing, I would like to express my appreciation to EA’s John Buttivant, who made time available for one to one discussion with me at last Thursday afternoon’s stakeholder meeting at Barnstaple.</p>	
Dunster Beach Holidays Ltd	Minehead to Blue Anchor (Dunster)	Yes	No	No	<p>In principal we agree with the general plan however we are very concerned at the suggestion of realignment proposals, as explained a the meeting I believe that the current line/coastline should be held not move the problem back i.e. realignment. This will cause us a real problem as we would lose our chalet site completely considering we are situated only 30 metres from the sea. Our concerns are not only for Dunster Beach but also for the golf course and Blue Anchor Hotel both of which need immediate attention to the sea front in front of their sections.</p> <p>My suggestion is to use rock armouring and lots of it then build up the beaches with smaller materials to form a defence. Also to consider the installation of groyne especially to Warren Point in front of the golf course and to shorten the long groyne at the east end of Minehead sea front. In addition all the material hauled from the Gables off Warren Point a few years ago should be replaced to build up the natural defence seaward of Warren Point.</p> <p>As far as Dunster Beach is concerned we will need to start a new long term project of groyne to build our frontage even more the cost of which should be supported by the council, Environment Agency and Defra, along with contribution from Dunster Beach, as we need to Hold our current line for the maximum time possible.</p>	<p>Reflect more strongly need for immediate action in short term at Warren Point and Blue Anchor.</p> <p>At Warren Point, refer to B&V Feb 2009 report on what to do in short term here >> “ <i>We recommend that to continue to maintain the defences to ensure that the defence standards are retained through a programme of upgrading works, probably enhanced by erosion control measures (to be further investigated at project level). The programme of work will seek to maintain an acceptable minimum standard of protection to be defined by sequential testing at project level and will follow a cycle reflecting the design life of the upgraded bank of approximately 20 years.</i>”</p> <p>Do not believe FCD budget would be approved for this purpose; consider mentioning that detailed study and consideration of offshore breakwaters here may be needed (undertake in short term).</p> <p>Need to resolve issue over what public purse would likely fund, and what private funds should cover; consider renaming short term policy MR, but supporting Dunster Beach Ltds ongoing efforts if they wish to continue them and so long as it is demonstrated that they continue to have a minimal effect down-drift.</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
Retreat Caravan Park	7d43	Yes	Yes	Yes	Barrage or no barrage it is extremely important to at least hold the line to protect property in this area.	Noted. Section will be included in Draft SMP explaining the situation regarding the barrage.
<i>Non-affiliated Individual</i>	7d25	Yes	Yes	Yes	Of particular concern is the threat to the West Somerset Railway at Doniford where several small and varied sections of cliff have been protected but not completely, i.e. erosion is occurring around installed protection. The railway is the most important tourist amenity in the district. The area at Watchet known as the Recreation Ground (Helwell) is eroding very fast with threat to the railway.	Reflect this comment in policy statement text (and appendix G)
<i>Non-affiliated Individual</i>	7e06	Yes	Yes	Yes	I agree with the plan given what we know now. However, whilst attending the "open day" on Mon 13th at Oak Tree, there was much mention of the Severn Barrage and similar schemes (which has no bearing on our references) but was a topic which would not go away, but in the minds of many within the audience needed to be addressed so that it would not impinge on your plans and thereby affect them/us. Putting this to one side, I agree with your plan to Hold the Line.	Noted. Section will be included in Draft SMP explaining the situation regarding the barrage.

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
<i>Non-affiliated Individual</i>	7d19 to 7e06	Yes and No	Yes and No	Yes and No	<p>In you presentation, you requested an increased stakeholder engagement, and went on to state that the role of stakeholders included greater data collection and ultimate ownership of the Shoreline Management Plan</p> <p>The attempt at stakeholder engagement at the Edithmead, Highbridge venue (involving the public and other interested parties) left a lot to be desired. Flood defence at Burnham and the surrounding area is a hot topic but neither the media nor prominent campaign groups were informed until very late, if at all. There was no overall general introduction leaflet (a labelled draft is better than none) and it was very difficult to find one's way through the many different, over large sheets produced, and the under- labelled maps and 'risk areas'.</p> <p>Committees and administrations have a habit of generating artificial divisions of thought. The separation of the coastline into small segments for comment is channelling stakeholders away from expressing their real concerns, which is for the future of the estuary as a whole.</p> <p>The artificial separation of flood defence from energy harvesting is an expensive mistake that is repeated by the committees dealing with energy who will not deal with questions of flooding, and the Shoreline Management committees who similarly will not deal with matters of energy production.</p> <p>It is not our intention to discuss your individual shoreline management segments, since we are concerned with the future problems of the estuary as a whole.</p> <p>It is our contention that a suitable energy harvesting scheme will ameliorate future flood conditions, and in the long run, will be the less expensive option. With this in mind, the discussion of flood prevention measures within individual segments becomes academic. It has been postulated that the overall rise in sea levels, particularly when coupled with storm surge, could, in the not too far distant future, threaten as much as 30% of the land area of Somerset.</p> <p>In our opinion, this can only be offset by the construction of a tidal damping mechanism between Minehead and Aberthaw. The ideal damping mechanism would be an energy harvesting scheme such as a Reef, similar to that which has been proposed by Rupert Armstrong-Evans. The cost of building such a reef would be offset by the energy production in the future, and by the removal of the need to improve individual coastal defences. It would also satisfy European directives on the conservation of habitats in the estuary, since the rise and fall of the tide would still occur in much the same pattern as at present.</p> <p>cc local media, yacht club, Severn Estuary Partnership etc.</p>	<p>Comments noted but SMP has been instructed not to consider a barrage or any other scheme at this time.</p> <p>Section will be included in Draft SMP explaining the situation regarding the barrage.</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
Devon County Council	Northam Burrows				<p>A couple of things need clarifying here</p> <p>1. Allowing incursion on the Eastern side of Northam Burrows. Is this suggesting allowing the sea into the low lying area to the South of the landfill i.e. through the access road? This does not sound like a sensible idea to me as it would bring the sea directly to the edge of the landfill.</p> <p>2. protection of the landfill using embankments. This could be seen by the public as decision both to protect the landfill and what method to use. We accept that we cannot allow the landfill to wash away but we need to be careful about raising expectations about what we will do. We need some good science firstly to predict where the sea will attack the site and over what time scale and what to do about it. We would probably use a variety of techniques ranging from removal of areas where waste is in thin layers through rock armour, sheet pile, embankments etc.</p> <p>It could be better to say the we will need to take steps to prevent erosion of the site without being specific about techniques.</p>	<p>Mention this concern and need for detailed study.</p> <p>Make clear that is one possible option for more detailed study; include mention of other possibilities in text as suggested here.</p> <p>Modify text to this effect</p>
Sedgemoor DC	7d44, 7d45, 7e02				<p>SDC Officer comments sent by John Taylor on 6th July appear to have resulted in some changes (notably the position of the d44 / d45 Policy Unit boundary) but there is more that could have been taken on board / warrants further consideration. Therefore please ensure that those earlier comments are considered alongside stakeholder feedback.</p> <p>Other points that have been made verbally in / outside recent stakeholder / planner meetings but are worth putting in writing (and relate particularly to the Brean and Berrow area – Policy Units 7d44, 7d45, 7e02) are:</p> <ul style="list-style-type: none"> • Many people are understandably concerned about potential loss of property. There needs to be clarity on the question of compensation (particularly in the context of proposals to remove properties in the dunes or a NAI scenario). [There were clearly differences of expert opinion at the Highbridge event]. This could perhaps be part of a “Frequently Asked Questions” text. This information should include residents, businesses and local councils as its target audience. • If compensation is payable we need to understand the procedure – if there is any suggestion that the local authorities would be implicated in this process we will need to know – and you should anticipate this being a “show-stopper”. • Unless the property removal proposals at Brean and alignment of new set-back defences are indicated with greater precision it is inevitable that many local residents and businesses must “fear the worst” – providing more detail would potentially reduce the scale of the objection / concern at the consultation stage and allow a focus on those who are likely to be adversely affected – can something be done to illustrate what is envisaged? 	<p>Refer back to previous comments and ensure address in draft SMP.</p> <p>Possibly include a section on compensation in Draft SMP?? Or possibly include in an FAQs section that could be developed for public consultation period.</p> <p>This would need to be discussed with the Environment Agency.</p> <p>Modify text to clarify that SMP can only give an indication of where line may go; emphasise need for more detailed study to investigate this further.</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
National Grid	7d34 7d35 7d36 7d37 7d39 7d42	No Yes Yes Yes Yes Yes	No No No No Yes No	No No No No No No	While National Grid accepts the need to create and ensure the continued development of wildlife habitat we believe not enough investigation has been carried out to understand what impact managed realignment would have on the area to agree to an implementation of this strategy. The power lines running through the proposed area form a vital part in satisfying the UK's energy requirements for the short to medium term. Any potential impact to access or operation of these routes would be unacceptable as this would affect the potential long term strategy of no active intervention which causes great concern for us. National Grid would seek assurances that our assets and the UK's infrastructure were secure. Any relocation or movement of the routes would require significant investment and cause extreme logistical problems. The building of defences around the towers and/or causeways would need thorough investigation in order to establish the long term security of the route. At the moment not enough information is available to understand the potential impacts but National Grid are willing to work with the Environment Agency in better understanding this.	Mention in text + consider mentioning possible need for localised realignment >> include in draft SMP policy statement.
Planning Policy team, North Devon Council	7c13 to 7d13				<p>7c13 (East-The-Water to Torridge Bridge (A39))</p> <ul style="list-style-type: none"> Support a hold-the-line policy option for all time periods <p>7c14 (Torridge Bridge (A39) to Instow)</p> <ul style="list-style-type: none"> Support a hold-the-line policy option for all time periods The Tarka Trail, which is also the South West Coast Path, should be protected alongside the B3233 (maybe mention possible railway line re-establishment?) <p>7c15 (Instow)</p> <ul style="list-style-type: none"> Support a hold-the-line policy option for all time periods There are numerous listed buildings within the conservation area along Instow's seafront which should be highlighted for protection <p>7c16 (Instow to Yelland)</p> <ul style="list-style-type: none"> Support the proposed policy options in principle, although the managed realignment should protect the Estuary business park as a whole for all time periods. This area provides an important location for particular types of employment uses, including a strategic location for potential on-shore connections for the proposed Atlantic Array Any managed realignment should continue to protect the Tarka Trail, which is also the South West Coast Path, and all land behind the Tarka Trail (define all land behind? Is this north or south of the Tarka Trail?) 	<p>Ensure that the various features included in these comments are included in implications tables.</p> <p>Reflect this in discussion of potential MR positions as needing to be considered in detailed study.</p> <p>South West Coast Path policy is to MR as necessary; path would need to be realigned if realignment of defences was to be found to be appropriate as part of detailed study.</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
					<p>7c17 (Home Farm Marsh (Yelland to Fremington))</p> <ul style="list-style-type: none"> Support the proposed policy options in principle, although the managed realignment must continue to protect the former Power Station site and the adjoining ash beds (between the Estuary business park and East Yelland Marsh) with a hold-the-line policy option. Buried ash beds include asbestos deposits would be eroded by tidal inundation and could leach into the estuary Realignment over Home Farm Marsh may be appropriate The built up / Brownfield parts of the Army Camp at Fremington should be protected for all time periods with a hold-the-line policy option Any managed realignment should continue to protect the Tarka Trail, which is also the South West Coast Path, and all land behind the Tarka Trail (again, define) <p>7c18 (Fremington to Penhill Point)</p> <ul style="list-style-type: none"> Whilst the proposed policy options are supported in principle for part of this zone, the Fremington Quay area east of Fremington Pill should be protected for all time periods There is a conservation area covering Fremington Pill including several dwellings and a popular visitor centre. The reference to 'no assets at risk of flooding' is incorrect The Tarka Trail, which is also the South West Coast Path, should also be protected Fremington Pill is a Local Nature Reserve that should be identified as a relevant asset – implications of the proposed policy option are unknown <p>7c19 (Penhill Point to A39 Road Bridge (Bickington))</p> <ul style="list-style-type: none"> This policy unit is confusing – there is no road bridge at Bickington and the A39 is to the south of Barnstaple It must be subdivided into 2 smaller policy units – Penhill Point to Western Bypass and Western Bypass to A39 The stretch from Penhill Point to the new Western Bypass road bridge does not need to be protected by a hold-the-line policy option, although NDC does not object if that option is selected. A managed realignment or no active intervention policy option may be appropriate here provided that the Tarka Trail, which is also the South West Coast Path, continues to be protected or realigned. Most existing development at Bickington is well above sea level The stretch from the new Western Bypass southwards to the A39 road bridge includes Sticklepath and Seven Brethren where the proposed hold-the-line policy approach is supported There are major assets in this part of Barnstaple to the west of the Taw including numerous business and residential properties, the Leisure Centre, Tarka Tennis centre, waste recycling centre and proposed North Devon College at Seven Brethren, Barnstaple railway station and listed building including Halfords There is a conservation area at the village of Lake <p>7c20 (Upper Taw Estuary (east and west banks between A39 to tidal limit near Bishops Tawton))</p> <ul style="list-style-type: none"> Support the proposed policy options for all time periods, including protection of the railway line Bishops Tawton has numerous residential properties, a conservation area, community facilities and listed buildings <p>7c21 (A39 Road Bridge to West Ashford (Barnstaple))</p> <ul style="list-style-type: none"> Support a hold-the-line policy option for all time periods This policy unit is to the east of the Taw so references to the railway line and Sticklepath are inappropriate. These occur within policy zone 7c19 	<p>Reflect this in discussion of potential MR positions as needing to be considered in detailed study.</p> <p>Clearly state intention for Fremington is to HTL (in line with long-term plan) as above in response to 7c16.</p> <p>Make clear in text where Fremington sits (i.e. in 7c17)</p> <p>as above in response to 7c16.</p> <p>Renamed to be Penhill Point to A39; do not feel that MR is a viable policy here and NAI along the part towards Penhill Point may lead to long-term increased flood risk to developed areas.</p> <p>Amend text</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
					<ul style="list-style-type: none"> • This policy zone contains the town centre and large parts of the town including hundreds of listed buildings, so a holding-the-line policy option here is of paramount importance • The Tarka Trail from the Longbridge to Ashford, which also forms part of the South West Coast Path, should be protected • The hold-the-line policy option must also consider how Barnstaple will be defended along the River Yeo, Bradiford Water and Coney Gut tributaries <p>7c22 (West Ashford to Braunton (east bank of River Caen))</p> <ul style="list-style-type: none"> • Support the proposed policy options for all time periods • Reference should be made to the settlement of Wrafton, which must be defended under any managed realignment policy option • All references to RAF Chivenor should be amended to RMB Chivenor • The Tarka Trail, which also forms part of the South West Coast Path, should be protected <p>7c23 (Braunton to Horsey Island (west bank of River Caen))</p> <ul style="list-style-type: none"> • Support the proposed policy options in principle, although there doesn't appear to be much scope for managed realignment here. • The managed realignment should protect the existing properties along Velator Quay and the Braunton Great Field, which is one of only such saxon field systems remaining in this country • All references to RAF Chivenor should be amended to RMB Chivenor • The Tarka Trail, which also forms part of the South West Coast Path, should be protected • This policy unit is to the west of the Caen so references to Wrafton and Chivenor are inappropriate. These occur to the east of the Caen within policy zone 7c22. However, if the implication is that flooding along this policy unit would affect Wrafton, e.g. by flooding along Knowl Water, then it may be appropriate to retain the reference • Reference to freshwater habitats in Greenaways and Freshways Marshes SSSI and Braunton Swanpool SSSI are required here as well as policy units 7c24 and 7c25, since potential flooding across the Great Field and Braunton Marsh would also harm these important habitats 	<p>Double-check SMP defined tidal limits; ensure appraisal covers these (refer also to the CFMP) and this is reflected in text as appropriate.</p> <p>Reflect this in discussion of potential MR positions as needing to be considered in detailed study. Amend text to change to 'RMB'</p> <p>We cannot justify not having an MR policy here as it would preclude it from being investigated as part of the Taw/Torridge Estuary Strategy Study; that study will determine the appropriateness of MR in this area.</p> <p>As above, amend to be 'RMB'</p> <p>Check >> amend text as appropriate.</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
					<p>7c24 (Horsey Island)</p> <ul style="list-style-type: none"> Support the proposed policy options in principle, but depending on the details and extent for the managed realignment The Tarka Trail, which also forms part of the South West Coast Path, should be protected <p>7c25 (Horsey Island to Crow Point)</p> <ul style="list-style-type: none"> Support the proposed policy options in principle <p>7c26 (Crow Point and Crow Neck)</p> <ul style="list-style-type: none"> Support a managed realignment policy option for all time periods Delete references to Nature Reserve as the National Nature Reserve status was withdrawn over ten years ago, notwithstanding the great ecological importance of this area <p>7c27 (Braunton Burrows)</p> <ul style="list-style-type: none"> Support a no active intervention policy options for all time periods Delete references to Nature Reserve as the National Nature Reserve status was withdrawn over ten years ago, notwithstanding the great ecological importance of this area <p>7c28 (Saunton Down)</p> <ul style="list-style-type: none"> Support a no active intervention policy options for all time periods, provided that erosion of the cliffs would not threaten existing business and residential properties on Saunton Down <p>7c29 (Croyde Sands)</p> <ul style="list-style-type: none"> Support a no active intervention policy options for all time periods <p>7c30 (Middleborough Hill (Croyde Bay north))</p> <ul style="list-style-type: none"> Support a no active intervention policy options for all time periods <p>7c31 (Middleborough Hill (Croyde Bay north) to Baggy Point)</p> <ul style="list-style-type: none"> Support a no active intervention policy options for all time periods <p>7c32 (Baggy Point to Napps Cliffs (Putsborough))</p> <ul style="list-style-type: none"> Support a no active intervention policy options for all time periods <p>7c33 (Putsborough Sands and Vention)</p> <ul style="list-style-type: none"> Support a no active intervention policy options for all time periods <p>7c34 (Vention to Woolacombe Beach (Woolacombe Sands))</p> <ul style="list-style-type: none"> Support a no active intervention policy options for all time periods <p>7c35 (Woolacombe Beach)</p> <ul style="list-style-type: none"> Support a no active intervention policy options for all time periods <p>7c36 (Woolacombe to Morte Point)</p> <ul style="list-style-type: none"> Support a no active intervention policy options for all time periods 	<p>amend text</p> <p>amend text</p> <p>Erosion of cliffs may cause loss of properties; although SMP states that if funds available (from non-FCD budget) then defences could be maintained.</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
					<p>7d01 (Morte Point to Lee (west)) • Support a no active intervention policy options for all time periods</p> <p>7d02 (Lee) • Support a hold-the-line policy option for all time periods • Most of Lee is covered by a Conservation Area with several important listed buildings, which should be identified as a policy implication</p> <p>7d03 (Lee (east) to Ilfracombe (west)) • Support a no active intervention policy options for all time periods</p> <p>7d04 (Ilfracombe) • Whilst a hold-the-line policy option for all time periods is supporting in principle for parts of Ilfracombe, an advance-the-line policy option is proposed for Ilfracombe harbour, possibly as part of an outer breakwater • The harbour is already being overtopped on high spring tides • The height of walls at Wildersmouth Beach will need to be raised</p> <p>7d05 (Ilfracombe (east – Larkstone Beach) to Hele Beach (west)) • Support a no active intervention policy options for all time periods</p> <p>7d06 (Hele Beach) • Support a hold-the-line policy option for all time periods</p> <p>7d07 (Hele Beach (east) to Watermouth Slipway) • Support a no active intervention policy options for all time periods</p> <p>7d08 (Watermouth Slipway) • Support a hold-the-line policy option for all time periods</p> <p>7d09 (Watermouth Slipway to Combe Martin) • Support a no active intervention policy options for all time periods</p> <p>7d10 (Combe Martin) • Support a hold-the-line policy option for all time periods • There are several important listed buildings around Combe Martin beach, which should be identified as a policy implication</p> <p>7d11 (Combe Martin to Lynmouth) • Support a no active intervention policy options for all time periods</p> <p>7d12 (Lynmouth) • Support a hold-the-line policy option for all time periods • There are numerous important listed buildings which should be identified as a policy implication</p> <p>7d13 (Lynmouth to Foreland Point) • Support a no active intervention policy options for all time periods</p>	<p>refer to response above to Ilfracombe Harbour Masters comments.</p> <p>Mention in text.</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
Natural England	various				<p>7d25 (policy implications column) - remove <i>This policy will limit natural processes which are key to the integrity of Blue Anchor to Lilstock SSSI's geological features thereby limiting the visible exposures. However, in very long term, the move towards NAI would reduce this impact.</i> as NAI is not policy here.</p> <p>7d27 (policy implications column) - amend <i>This policy will limit natural processes which are key to the integrity of Blue Anchor to Lilstock SSSI's geological features thereby limiting the visible exposures. However, in very long term, the move towards NAI would reduce this impact.</i>to reflect NAI is policy for all periods</p> <p>7d29 (policy implications column) - amend <i>This policy will limit natural processes which are key to the integrity of Blue Anchor to Lilstock SSSI's geological features thereby limiting the visible exposures. However, in very long term, the move towards NAI would reduce this impact.</i>to be clear that the first bit relates to the short term HTL policy, and the second bit to the NAI policy in medium/long term</p> <p>7d33 - need more detail on this proposal [<i>about how MR would be implemented</i>]</p> <p>7d37 (policy implications column) - amend/remove to reflect policy being advocated >> <i>Potential benefits to the Bridgwater SSSI and National Nature Reserve, Severn Estuary SAC, SPA and Ramsar Site through the creation of intertidal habitat in areas of managed realignment in the medium term. A hold the line policy in the long term will cause coastal squeeze and loss of intertidal habitat.</i></p> <p>7d43 - Evidence? [<i>of dunes at Berrow being robust natural defence for 100 years</i>]</p> <p>7d44 - need to mention impact/implications for Berrow Dunes SSSI</p> <p>7d45 - <i>This could have implications for sediment circulation in Bridgwater Bay, and further study is required to understand the effects that this could cause - When will this be available??</i></p> <p>7e05- provide evidence for stating that the dunes here provide a naturally robust defence.</p>	<p>amend text</p> <p>amend text</p> <p>amend text</p> <p>Clarify in text that this would need to be determined by more detailed study; SMP can only give an indication.</p> <p>amend text as appropriate</p> <p>B&V (2008) study states this based upon detailed investigation.</p> <p>ensure included in implications table</p> <p>Clarify in text that this would need to be investigated as part of a more detailed study.</p> <p>based on assessments in processes report.</p>
Wessex Water	n/a				As part of the consultation exercise WW will need to identify any critical infrastructure assets that may be affected by SMP proposals. I would like to agree any requirements for future appraisal work that may be necessary to understand the risk and impact upon existing asset. I will arrange to forward plans of these to Alan Frampton, Halcrow. If any further information is required at this stage please contact myself to discuss.	Need to appraise assets at risk using data provided and include in implications tables.
Countryside Landowners Association					Wide ranging comment - refer to separate document provided.	<p>Comments provided are very broad level and more aimed at central government; therefore can not be dealt with by the SMP alone. Will pass comments to relevant persons/organisations.</p> <p>Consideration of farmland is already included in our appraisals; ensure that this is clear in the draft SMP.</p>
Environment Agency	Various (comments made at PMG meeting on 3rd August)				Watchet - check where boundary on west of town is in relation to the road; need to ensure address critical issue of the road and its proximity to the cliff edge (refer to aerial photo provided by JB/VD).	Check >> amend as appropriate

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Heanton Punchardon Parish Council	7c27	No	No	No	<p>We feel strongly that there should be active steps to control the erosion of the dunes (active replanting of marram grass). At the meeting on 16th July Andy Bell stated there were less covered dunes in an aerial photograph taken in 1947 than at present. This was a bad date to choose after prolonged use by the American forces preparing for D-Day. Also power hoses using water from the River Caen in Braunton has washed away huge areas to clear explosives from the dunes. It took years for the dunes to recover. They were actively encouraged to recover by splitting and replanting marram grass. Locals still alive took part in this.</p> <p>No one knows what will happen if the dunes are allowed to drastically reduce. Is it worth the risk?</p>	SMP policy would not prevent such actions to manage the dunes, but would not come from FCD budget.
(Member) 1716 Northam Burrows Committee	Westward Ho!, Northam Burrows, Pebble Ridge	Yes			<p>Torrige DC, Natural England and other interested groups use the term 'Managed Retreat' with reference to the pebble ridge heading northwards from Westward Ho!. There is in fact NO managed retreat taking place, in fact NO ACTION at all. Meanwhile the pebble ridge, especially towards the northern end is suffering continuous serious erosion. I ask why is NOTHING being done? I see daily differences along the ridge.</p> <p>May I add there is report completed by Mr G.D. Slade, Kenton, Exeter, retired and highly qualified civil engineer of which little notice appears to have been taken by Torrige DC, NDASCAG, Northam Local Council and Natural England.</p> <p>I would also add little notice appears to be taken by NDASCAG of local anecdotal knowledge and opinion.</p>	<p>Policy in the SMP is to provide more management.</p> <p>This report has been reviewed and information included to aid understanding of baseline processes; the recommended solution from this report was also appraised in the option appraisal but found to be inappropriate.</p>
(Chairman) Northam Burrows 1716 committee	7c07	Yes	Yes	Yes	<p>First a question for you to answer: Why is there no mention in your report that Northam Burrows is an ancient grazing common, hence the 1716 committee? Far more important than an SSSI, AONB and part of the biosphere.</p> <p>The Burrows must be protected to DELAY the prospect of severe flooding in many areas for many years to come. Also to allow the ancient right of grazing to continue.</p>	Mention in 'context' statement in text to take forward to draft SMP and ensure included in implications table.
(Secretary) Northam Burrows 1716 committee	Westward Ho! to Saunton Down				<p>Northam Burrows is a common with grazing rights. This should be recognised and stated within the policy context.</p>	as above
<i>Non-affiliated Individual</i>					<p>Introduction</p> <p>Two themes, Stolford to Wall Common - as an example of 'management' and practice. Some general comments about 'options' for determining 'policy'. Shoreline Management Plan (SMP2). Indeed the SMP should not be called a 'shoreline' management plan. The shoreline could be the highest astronomical tide strand. What the plan should be is a coastal environment plan - making definition clearer, and including and encompass the coastal hinterland, and marine influence sections of the physical environment, for example distal reaches of rivers, where these could be determined by natural indicators.</p> <p>Stolford to Wall Common</p> <p>It is difficult to envisage where 'to create habitat here are currently under detailed investigation and consultation as part of the Steart Managed Realignment Project' is justified. People I chat with - as recently as 25 July 2009 - when topographically surveying - have no idea of what is proposed. Further, I can not get funding to further my own investigations. These investigations are published. Therefore, 'detailed investigation' could be a doubtful claim.</p>	<p>Title is defined by central government; not SMP role to change this.</p> <p>MR is currently being investigated in detail as part of a separate study.</p>

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					<p>If this is an example of how 'management' is to proceed then life will become more difficult for the 'authorities' as greater numbers of people realise that the management is pre-ordained. There is evidence of this in the proposed plan. The proposed actions for 'defence' to the west of Hinkley (HALCROW, 2007) is written into the plan, where as other ideas are not. An idea put forward is the armouring of Steart Island (Per. comm., Neville Jones, Councillor for Burnham on Sea). Armouring of Steart is not included in the proposed SMP, and reason(s) not presented. Mitigation of adverse effects is not detailed. For example, 'defences' to the west of Hinkley could impact both the near, and distant coast. What measures are proposed to mitigate these effects/impacts?</p> <p>It is also problematic when to create a habitat, another is destroyed. For example, two species that are near extinct in Britain - and you should be ashamed. At present Wall Common "probably has more hares than the rest of Somerset put together" (per. comm., Hinkley Power station security person, 25 July 2009). There are also numerous skylarks. These are under threat as people take their dogs to Wall Common - and let them loose. This ignores the dog fouling, and litter. If, Wall Common is made into wet land then the present habitat would be lost - and the displaced flora/fauna would go where? Further, if the bird life is considered, would a salt marsh meet requirements? At present the inter-tidal feeding birds do not feed on the salt marsh. Those birds that do feed on inter-tidal mud flats are fussy about where they feed, where this likely depends on the relative percentages of mud/sand. Would a man made inter-tidal flat replicate the relative percentages of mud/sand? A proposed, funded, PhD study to investigate a Thames estuary man made inter-tidal flat sedimentation collapsed because no-one applied to undertake the study.</p> <p>General Comments A section detailing funding for investigations is not present. A section on what research is needed, is not present. A section on the research/investigation program is not present. A statement of what the policies are designed to achieve is not present.</p> <p>The options for the objectives, hold the line, advance the line, managed realignment and no active intervention are limited. Artificial reefs, and managed retreat are not included.</p> <p>It is assumed that construction of new more robust defences is a solution (SMP2, Draft Policy Options Summary - Parrett Estuary, 2009). Some appear to think continuing to build concrete bunkers to defend the coastal environment is the solution. In the same paragraph it is admitted that beaches fronting seawalls can share similar fates - namely sediment depletion. The current practice - where this appears to be last resort - of defending a seawall with groynes, sediment renourishment, and rock armour should prove that these engineered solutions are untenable, and especially in the long term. So why is there a persistence with these as a method?</p>	<p>Do not believe that defence of steart island is feasible on technical, environmental or economic grounds.</p> <p>The document presented at the July KSFs was a summary of proposed preferred policies; was not intended to contain detail on the level suggested here. Research/investigation programme is part of the Action Plan developed once SMP is being finalised (post public consultation) Policy statement in Draft SMP should clarify this more.</p> <p>These are the 4 policies we have to use; we can consider reefs as part of HTL or ATL; Managed retreat is now Managed Realignment.</p> <p>Method persisted with because in some areas it is not possible to realign to allow beach to adjust therefore need hard structures and accept beach loss; SMP does in a number of areas propose to move away from hard structures at the coast to allow more beach adaptation where it is likely to be viable to do so.</p>

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					<p>Given the local commitment to understand the coast is not high, for example, from the local 'authorities' (Sedgemoor no longer fund their own beach profiling), Somerset County Council, and West Somerset District Council know it all, and local authority resources (people ability) are dismal (DEFRA, 2006) there is no allowances made for this shortfall. This is exacerbated as the EA has few data for non-manmade ('defended') lengths of coast.</p> <p>The public knowledge of coastal dynamics is not good - vis., parking, and driving on beaches is OK.</p> <p>No recognition of the present man induced problems. For example, near shoreline (Mean High Water Springs) runnels result from land drains, namely golf course, caravan parks. No statement of what is intended for these, not only the morphological impact, but also the nutrient run off.</p> <p>DEFRA - Future Coast. Shoreline Management Plans, 6 January 2009. Appendices, Section D. Sediment budgets, coastal response to events?</p> <p>Lack in Somerset. No ground truthing, lack of instrumentation. DEFRA make assumptions, especially numerical modelling since many applications, seawall constructions, for example Weston super Mare, are not verified models. Plus a 50 year prediction by a model is likely error magnified. These 'solutions' to coastal 'issues' are funded?</p> <p>Projects written into the SMP. Coastal wetlands, surge barriers. Projects appear to be considered in isolation. Parrett River surge barrier. This appears to be a fixed response to a moving problem (sea level, surges, tide, sediment). Tidal harmonics along the river may change, and would require a further refinement of a barrier. If tidal harmonics change, the residual current(s) and sediment transport could change. If dredging is resorted to - then the present sediments in the Parrett are heavily polluted, for example phenol (Water for Life and Livelihood).</p> <p>Vanishing hazard lines. The proposed SMP has maps with set back hazard lines? In places these lines vanish along shore, namely about Brean Down. As a developer - this is a gift.</p> <p>Options are being announced, by the SMP, when the data, and information to justify these do not exist. For example, re-alignment along the North Devon coast. If the lower river valleys become wetlands/saltmarsh, in anticipation that these can accommodate rising sea level by entrapping sediment - then the sediment has to come from some-where to be entrapped. If this sediment is via littoral drift, then the sediment passing into the saltmarsh is removed from the littoral drift, and could induce sediment starvation down-drift from the entrapment. This could have similar consequences to a groyne effect. Indeed the Wall Common re-alignment could impact the downdrift coastal environment, since the assumption is we know the present littoral drift, and supply to the Burnham on Sea beach.</p> <p>A need for maps, for example, information on projected relative sea level, land level changes (see attached - FLATHER et al., 2001)</p>	<p>Amended lines to 'close gaps'.</p> <p>This is why SMP proposed HTL in short term in these areas to allow the necessary investigations to be carried out to determine the appropriateness of implementing MR in these areas. But SMP has to have MR as a policy to allow these studies to be carried out.</p> <p>Consider for public consultation exhibitions.</p>

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					<p>Literature Cited DEFRA. 2006. Review of local authority skills and capacity for coastal defence functions [project HA I]. Coast and Country Projects Limited, pp.49.</p> <p>DEFRA - Future Coast. Shoreline Management Plans, 6 January 2009.</p> <p>Draft Policy Options Summary - Parrett Estuary, 2009. Halcrow. pp. 12.</p> <p>FLATHER, R; BAKER, T; WOODWORTH, P; VASSIE, I and BLACKMAN, d. 2001. Integrated effects of climate change on coastal extreme sea levels. Internal Document No 140. Proudman Oceanographic Laboratory. pp. 20.</p> <p>HALCROW, 2007. British Energy Generation Ltd, Review of medium to long-term coastal geohazard risks at British Energy sites. pp. 18.</p> <p>Water for Life and Livelihood. Annex B: Objectives for waters in the south west river basin district. Environment Agency, pp. 1782.}</p>	
The Clovelly Estate Co. Ltd	7c04 Clovelly	Yes	Yes	Yes	<p>We were pleased to note that 'hold the line' at Clovelly includes in the short term maintaining the seawall and breakwater to protect the village. You refer to eventually replacing them with larger structures.</p> <p>We recommend consideration be given to a breakwater/pier on the west side of Clovelly harbour. This would give protection to the existing, historic harbour (which dates back to the C.14th) which as you imply would be vulnerable to rising sea levels coinciding with storms in the Atlantic. I enclose a proposed plan for this additional breakwater and letter dated 28/7/09 from Mr Remo Rossi.</p>	<p>The scale of the proposals shown on drawings provided are not thought to be appropriate and would have much greater impact on processes drift and would be unlikely to be viable economically or environmentally.</p> <p>Consider modifying SMP text to reflect the intent of the proposals though, but on a smaller scale (i.e. build new breakwater around the outside of the historic one).</p>
Westward Ho! Residents Associate	7c06 and 7c07	Yes	Yes	Yes	<p>7c06 Westward Ho! itself appears to be fairly robust and proposals for the short and medium term seem to cover the key issue.</p> <p>7c07 This is the most contentious area for the review group I sat with. Key issues facing interested parties are same. The existing issues of flooding and pebble ridge breach that are in evidence today. Concern was expressed over the timescales to ratify these policies/create projects/seek funding and complete the necessary work. Some of these 'immediate' concerns should be raised with Torridge DC as a matter of urgency. As a resident and user of the Burrows for recreational purposes, it is ??? that we protect this very important tourist attraction for Westward Ho! if we are to maintain the viability of the town for future tourist use.</p>	Comments noted. No action required

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CPRE Torridge District Group, Devon Branch	7c03 (Hartland Point to Clovelly) to 7c14 (Torridge Bridge to Instow).				<p>We are most pleased to confirm that we have no concerns whatsoever in all these proposed Policies and it seems to us that Halcrow have investigated and understood the detailed complexities of the individual sectors extremely well.</p> <p>Whilst we are most happy to endorse these proposals for the "Short Term - to 2025", we are only too much aware that the coastline is subject to the forces of nature (as well as man!). We consider that, as time passes, some of these proposed policies may need to change for the Medium (to 2055) and Long terms (to 2105). This could well be the case if, for instance, sea level rise predictions, which must, at best, be very speculative, turn out to be far from accurate. In that case, or other similar cases, we would hope that there is enough flexibility in the system for changes to be made to the mid and long term policy (and even, possibly, the short term) proposals.</p> <p>We thank you for the work that you and your team have put into this Draft, and we consider that, at this stage, it is "a job well done".</p>	SMP will be reviewed periodically for this purpose.
The Taw Torridge Estuary Forum	Various				<p>7c07 Does the managed re-alignment cover the whole distance from the Pebble Ridge to the old landfill site? Along What line? Is the proposed re-location of the golf course a realistic proposition?</p> <p>7c12 There is a reference to "the developing Taw Torridge Estuary strategy study". Is this the Taw Torridge Estuary Flood Risk Strategy Study? Please advise as to the state of development of this study and provide a contact.</p> <p>7c17 There is concern over a variety of potential problems that the Medium Term policy of managed realignment will give rise to. Given that the old ash beds and other parts of the old power station must be protected, will this not result in isolated areas requiring long, encircling protective walls or banks? Hold the line would be more appropriate.</p> <p>7c18 In which Policy Unit (17 or 18) does Fremington Quay lie? The policy for the quay area needs to be stated.</p> <p>7c19 We cannot see the homes, businesses, community, recreation and tourism amenities that would be threatened if there was no active intervention here. Managed retreat would seem a more appropriate policy.</p> <p>7c20 Surely this Policy Unit should include reference to Barnstaple and the significant issues rising sea levels will present to the town. This is particularly relevant given the proposed developments on 7 Brethren Bank.</p> <p>7c21 The references to Barnstaple in this Unit should appear in 7c20.</p> <p>7c22 The Supporting Information statement concerning the completed realignment works at RM Chivenor answers a major part of the first query under Specific Policy Implications.</p> <p>7c23 Given the existing defences and topography, we cannot see how the Medium Term Policy of Managed Realignment could be implemented. The existing line should be held.</p> <p>7c26 We cannot see how a policy of managed realignment could be implemented here as there is no space to fall back into. This area should be a priority for study to investigate the importance of the spit for the protection of the inner estuary. On completion of that work an informed decision can be made to either hold the line or take no action.</p>	<p>MR policy covers the open coast of Northam Burrows; 'lines' would be determined by detailed study - SMP can only give indication but thought unlikely that would involve a single long set back line rather a combination of localised measures whilst allowing the ridge to evolve largely naturally.</p> <p>Contact provided.</p> <p>Refer to comments above from planning policy team (North Devon Council);</p> <p>Mention these as being a key consideration for detailed studies that would determine the appropriateness or otherwise of MR in the estuary.</p> <p>Fremington Quay is in 7c17 and would be HTL - clarify in text.</p> <p>Check >> likely confusion due to inaccurate naming of policy unit (refer to planning policy team (North Devon Council) comments)</p> <p>Check >> amend text as appropriate</p> <p>Refer to response to planning policy team (North Devon Council) comments. MR reflects potential for a set back defence; policy provides most flexibility until detailed study can investigate.</p>

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Environment Agency	7d16. Porlock Weir	Yes	No	Yes	<p>The community at Porlock Weir includes several homes, businesses and historic buildings. I believe there would be a cost benefit for protecting these into at least the medium term- hence disagreeing with the NAI policy from 2025.</p> <p>I am concerned about the continuity of policy- why would the community at Porlock become NAI when in the medium to long term Blue Anchor MU is HTL for the benefit of the road (which could be diverted) and a single property.</p>	<p>From our assessments, we believe that there is sufficient cost:benefit to justify maintenance of defences in the short term to prolong their life as long as possible, but when this becomes technically unsustainable (expected to be during the medium term), there is likely to be insufficient cost:benefit to justify replacing defences with the type of structures that would be needed to provide long term reduction in flood and erosion risk.</p> <p>We believe that replacement of defences would be needed in the medium term >> modify policy to say HTL for as long as is viable in the medium term, but accept will move towards NAI during this period.</p> <p>Blue Anchor is a different situation where defences have only recently been constructed and, with ongoing maintenance these defences can be maintained into the long term; ultimately the SMP is saying the same as at Porlock Weir, but on different time-scales.</p>
	7d23 Blue Anchor	Yes	No	Yes	<p>This policy does not compare in thought process with that of Porlock Weir. A single property and road are to be protected into the med to long term but the community at Porlock Weir would not? I was under the impression that the road could be moved in the med to long term and that the management of an area would not be dictated by something like this.</p> <p>There are few assets to protect in comparison with Porlock Weir.</p> <p>Understanding of all policies would be better improved if we could have detailed policy boundary maps- does the policy boundary lie at the end of the shorter coastal defence wall...or has it been moved to incorporate the potential to extend the defences to prevent outflanking in the future (suggested rock armour).</p>	<p>(refer to comment above re. Blue Anchor)</p> <p>Policy unit maps will be included in the Draft SMP for this purpose; boundary at Blue Anchor has been moved eastwards to allow for defences to be extended.</p>
	7d44 Berrow (north) Brean (north)	No	No	Yes	<p>There is no scientific evidence to support suggesting the removal of properties on the sand dune belt at Brean. If the properties were to be removed what is the likelihood that the sand would regenerate the existing dune system?</p> <p>Again consistency is an issue- why should these people remove their homes but residents on other parts of this coastline where there are issues of erosion not have to remove their properties?</p> <p>Do the coastal erosion maps show high levels of erosion at this location? B&V noted that there is generally a low/med risk due to the stability/height of the existing sand dunes. Removing the properties from the dune system may risk destabilising the dune system leading to a reduction in flood protection. (Burnham to Brean Coastal Study B&V- 2008).</p>	<p>Based on B&V report (which says to HTL of the back line of dunes here) we have looked at the potential erosion risk under NAI - this could cause loss of dunes if no action is taken (we are not convinced by B that the rear line of dunes will be unaffected in the long term if policy is 'Do Nothing' and that the fronting dunes will remain).</p> <p>We feel that freeing up more sediment from the dunes currently developed upon is the most realistic way of trying to encourage the dunes to re-establish to achieve the aim of holding the rear line of dunes; however given the state of degradation of the dunes we are uncertain about how viable even this will be in the long term, hence consideration of set back defence in that period.</p> <p>Will, however, modify text to say that dune management is required here but to achieve this, it may become necessary to remove some properties - to be determined by more detailed study. We do not feel that what is proposed falls within a HTL policy, but rather a MR policy.</p>
<i>Non-affiliated Individual</i>	7c07	Yes	Yes	Yes	<p>We agree with the said proposed policy, but we believe something needs to be done in the short term.</p>	<p>Comments noted. No action required</p>
The Town Hall Lynton	7d12	Yes			<p>Hold the line should recognise the need to restore traditional defences that have been allowed to degrade through lack of funding, viz: groynes and breakwaters to deflect and reduce the height of waves during storm surges, which are quite common and the inevitable spring tides. The occurrence of the two together has serious implications for the harbour and bay environments. The Rhenish Tower (?) itself is now occasionally deluged by wind driven waves.</p> <p>More considered remarks would have been possible if the predicted changes of sea level used in your assessments had been provided. Similarly, attempts to obtain predicted sea levels upto 2025 from the Exeter based Met Office for climate change have still not been answered. Why is this?</p>	<p>Exact implementation of HTL policy would be subject to more detailed study. The SMP policy of HTL would however, allow continued defence.</p> <p>The Met Office is not part of the NDASCAG therefore can not answer on its behalf. However, predictions of sea level rise are provided with the draft SMP.</p>

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Wessex Regional Flood Defence Committee					<p>I generally support the draft policy options. However there are 2 issues I would like to emphasise in the area I know particularly well.</p> <p>1) Does research confirm there is sufficient sand in the Bristol Channel, in the right location to achieve the degree of dune evolution needed North of Burnham on Sea?</p> <p>2) Whether the eventual defence line in the Brean area should be published now is a moot point. What does seem essential to me is that the Group should have a clear idea of where this should be given the past problems in the River Axe area and the important transport infrastructure close to the coast.</p> <p>I hope these comments are helpful.</p>	<p>B&V 2008 report for Burnham to Brean suggests that there is a long term trend of advance of the MHW and MLW marks; but that the dunes themselves are eroding. This also identifies a clockwise sediment circulation cell between the Parrett and Brean Down. Therefore of more importance here is likely to be the availability of sediment within this cell, rather than the wider Bristol Channel, which is more likely to provide finer sediment in this area.</p> <p>The uncertainty over availability of sediment is why the proposed policy suggests removing some development from the dunes at Brean so as to provide more sediment to the system. This uncertainty is also why a secondary defence line is proposed to manage the flood risk to the wider area, rather than hard defences along the front of the dunes which would exacerbate beach loss and potentially impact on sediment circulation to the detriment of other parts of this frontage.</p> <p>re. (2), the SMP only suggest possible realignments; further detailed studies are needed to identify confirmed alignments.</p>
National Trust					<p>Having read the SMP2 Proposed Preferred Policy Options paper, I have some serious reservations about the proposal for Unit 7d17 (Porlock Weir to Hurlstone Point). The preferred policy of managed realignment is not consistent with National Trust policy for a number of reasons:</p> <ol style="list-style-type: none"> 1. The National Trust, the landowner of the eastern half of the bay, has promoted a policy of working with natural processes since 1990 when proposals were put forward for a beach replenishment programme to strengthen a weak section at Porlockford cliffs. 2. We worked closely with other landowners, statutory bodies and other interested parties throughout the 1990's to develop a coherent strategy for the whole of Porlock Bay, based on minimal interference. 3. Following the breach in 1996 the land behind the shingle ridge has developed into an important saltmarsh that has been recognised as a very valuable resource for the National Trust, the local area and Exmoor National Park. 4. The site has become nationally recognised as an exemplar of positive coastal management based on natural processes. 	
					<ol style="list-style-type: none"> 5. The developing saltmarsh has become one of the best examples of such sites in the Bristol Channel. According to Natural England It supports approximately 80% of the Sea Purslane population in the Severn Estuary. 6. The National Trust, EA and NE are keen to allow the natural development of the existing saltmarsh to increase this valuable habitat and landscape and to maximise its potential in absorbing wave energy in the likelihood of increased storm activity. 7. The preferred policy of the construction and maintenance of embankment defences would stop the natural development of further saltmarsh to the detriment of coastal defence and biological value of the habitat. 8. The 10m contour lies well to the north and west of Porlock and Bossington and, even with the predicted sea level rise by 2080, it is very unlikely that this level will be exceeded by marine incursion and thus the risk to inhabited areas is absolutely minimal. 	<p>6. The policy states NAI for the open coast, in recognition of this fact.</p> <p>7, 8, 9 and 10 - have revisited the flood zone mapping and it is in the fluvial not tidal flood zone.</p> <p>Therefore agree to amend the text to remove the secondary defence banks mentioned, and instead reference the ongoing studies (which we were not previously aware of the details of).</p>

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					<p>9. We recognise, however, that the villages of Bossington, Allerford and Porlock are at risk from flooding from fluvial flooding. DEFRA has recently awarded the National Trust a grant of £473,000 to develop a 3-year programme of land use change to mitigate against future flooding. We are working closely with EA on this project and part of work will be to create a bypass channel at Bossington Beach to allow the Horner River to empty naturally into the sea without backing up into Bossington during major weather events. The proposed construction of an embankment would not be compatible with the flood mitigation project.</p> <p>10. We are also working closely with EA in a habitat creation programme at the mouth of the Hawkcombe Stream, which would potentially increase the current area of saltmarsh and allow a natural channel to develop for the river mouth. Similarly, the creation of an embankment would not be compatible with this programme.</p> <p>With these points in mind, I would recommend that no active intervention would be the preferred option for this section of coastline.</p>	
Natural England					<p>7c07 Northam Burrows (a) Reduction in spatial extent of the Northam Burrows SSSI (does this anticipated reduction factor in accretion at places such as Skern?) as the pebble ridge rolls back to the retreat line (medium to long term)</p> <p>(b) amend sentence to read >> This rotation and roll back could be allowed to occur largely naturally, though beach recycling could occur where it is judged to help manage this process, e.g. by aiding progradation at the northern end of the spit and it is not deemed to interfere significantly with 'longshore sediment transport'.</p> <p>7c08 Skern Salt marsh to Appledore comment on the HTL policy to consider >></p> <p>A hold the line policy here will need to have some flexibility to allow sediment and water to pass beneath the Skern road. Such processes will be important and a hold the line policy that prevents this may impact adversely on how the rest of Northam Burrows evolves. A managed realignment policy would provide greater flexibility here if coastal change elsewhere ends up being different to what is anticipated.</p>	<p>(a) no - this is purely the implication of the policies from the open coast side. Skern side is dealt with in adjacent unit.</p> <p>(b) Have amended text in draft policy options document to this effect.</p> <p>Will amend to mention this as an option to consider in any HTL scheme; this could be termed MR or HTL, but feel that HTL more accurately reflects the intention of the policy - see also similar comments from Braunton Burrows UNESCO Biosphere site.</p>
RSPB					<p>Main comment is that we should try to define actions for units where we propose to do minimum, and what contingency looks like on these stretches if changing circumstances force a change of action.</p> <p>Otherwise, looks pretty good.</p>	<p>Comment noted; possible actions will be picked up more in the Draft SMP, and even further in the Action Plan that gets produced near the end of the process.</p>

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Braunton UNESCO					<p>comments about long term visions</p> <p>(a) amend text >> Retention of defences at Clovelly is likely to be economically viable, and unlikely to have any wider coastal processes implications, provided the current practice of annual transfer of pebbles from the west to east continues.</p> <p>(b) amend text (Westward to Saunton) >> The Skern frontage will be held in place in order to ensure Northam Burrows continues to protect the inner estuary, whilst also retaining as much land area as possible to adapt land-use in this area as more seaward land is lost. The proposals will allow for tidal incursion to help warp up the land to help it to adjust to sea level rise.</p> <p>(c) question (Westward to Saunton) >> Whilst the retention of defences that currently exist at Saunton (do you mean Crow Point?)</p> <p>(d) amend text (Taw Torridge) >> Although the geomorphological modelling by Pethick suggests there is little significance; implementation of 'Managed Realignment' at any site within the outer Taw Estuary has the potential to alter flow regimes and thus coastal features at the mouth of the estuary</p> <p>7c02 - to implications add >>Unlikely to have implications for UNESCO Biosphere Reserve.</p> <p>7c03 - to implications add >> Policies to allow the landward movement of the SAC habitats should be developed. Unlikely to have implications for UNESCO Biosphere Reserve.</p> <p>7c04 - to policy epochs add >> Continue practice of pebble transfer across harbour from west to east</p> <p>- to implications add >> Unlikely to have implications for UNESCO Biosphere Reserve.</p> <p>7c05 - to implications add >> Unlikely to have implications for UNESCO Biosphere Reserve.</p> <p>+ suggests changing name to be 'Clovelly to Seafield House'</p> <p>7c06 - suggests adding to unit title 'Seafield House to Sea Front Car Park'</p> <p>- suggests might need to explain more the impacts upon SSSI/SAC</p> <p>- amend 'coastal' in 'south west coastal foot path'</p> <p>7c07 - amend short term policy text with >> Continue to reduce the risk of flooding to developed areas along the southern part of Northam Burrows, where it abuts to Westward Ho!, and to the former landfill site, by constructing embankment defences along these areas, whilst allowing the pebble ridge to roll back and rotate to a more swash aligned position to assist longevity through natural processes (possibly aided by beach recycling activities), through managed realignment.</p> <p>- question about all policies >> Is construction of embankments too prescriptive at this stage of the SMP2. Same medium and long term</p> <p>- name caravan park (Surf Bay)</p>	<p>Have amended text to reflect this.</p> <p>Amended text to reflect this - refer also to comments from Natural England.</p> <p>No - does mean the defences at Saunton at the northern end of Saunton Sands.</p> <p>Disagree with this statement; Pethick's work highlights the significant uncertainty with regards sediment sequestration - MR might not work and could adversely affect sediment distribution patterns in other parts of the estuary.</p> <p>Have added text</p> <p>Have added text</p> <p>Have added text to reflect this.</p> <p>Have added text</p> <p>Have added text</p> <p>Have amended policy unit to 'Clovelly to Westward Ho! (Seafield House)'</p> <p>Will not amend unit name as feel Westward Ho! is more obvious.</p> <p>Have amended text to address this.</p> <p>Have amended all instances of this</p> <p>Will amend text along these lines</p> <p>SMP has to make assumptions about what would likely be constructed in areas, so no, not too prescriptive.</p> <p>Have amended</p>

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					<p>amendments to implications >> Loss of section of a minor road (medium term), providing vehicular access to the northern sections of Northam Burrows, the information centre and the car park (long term) due to erosion and flooding. Minor changes in landscape. (Description can be confusing.)</p> <p>Minor road behind the ridge will need to move back as ridge rotates. Ultimately access via the Pebble Ridge Road access will be lost. Road access to the Visitor centre will be compromised in medium term.</p> <p>Loss of parts of the Golf Course due to erosion. Golf Course may be able to restructure within other parts of Northam Burrows,.</p> <p>Loss of large sections of the South West Coastal Path due to erosion (medium to long term) and flooding. These sections will need to be relocated inland inline with their current policy.</p> <p>Any construction of defences would need to be sympathetic to the Area of Outstanding Natural Beauty designation and support biodiversity and sustainable development policies of the Biosphere Reserve.</p> <p>7c08 - suggests splitting into 2 units (1) Greys sands Hill to Appledore Bridge & (2) Appledore Bridge to Appledore west. Policies for each then suggested to be >></p> <p>(1) add text to policy descriptions in all epochs - to continue to provide access to the landfill site and the distil part of the ridge. Whilst still allowing the options to allow tidal incursion to increase sediment deposition on Northam Burrows to provide resilience for sea level change, through hold the line.</p> <p>(2) Allow natural processes to continue. Public benefit unlikely to be realised through funding defence works. no active intervention</p> <p>7c10 - suggests amending unit name to Appledore to Cleave Moorings, Northam</p> <p>7c11 - suggests amending unit name to Cleave Moorings, Northam and Bideford</p> <p>7c12 - implications add >> Although outside the Taw Torridge SSSI, creation of intertidal habitat will benefit the SSSI by offsetting the losses occurring within in line with the UNESCO Biosphere Reserve policy to date</p> <p>- to context add >> The policy of no active intervention in much of this upper part of the estuary would eventually see the estuary able to adapt to rising sea levels and other climate change impacts, by transgressing into these low-lying areas as defences fail over time. The Biosphere Reserve has been implementing small to medium scale managed re-alignment over the last 10 years in support of this type of action.</p> <p>7c13 - to implications add >> A hold the line policy has the potential to cause coastal squeeze with loss of intertidal habitat from the Taw Torridge SSSI. In which case controlled tidal exchange on land to the east of the main road might be an option for parts of this stretch.</p>	<p>Amended text</p> <p>added</p> <p>have added text to this effect</p> <p>added</p> <p>added</p> <p>Disagree - splitting this and having NAI in (2) is counter-productive to achieving the aims of the SMP in this area, in that there is a potential flood route from the area marked as (2) into Northam Burrows.</p> <p>added text to this effect.</p> <p>Disagree (see comments above)</p> <p>amended</p> <p>amended</p> <p>added</p> <p>emended text to this effect</p> <p>amended text to this effect</p>

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					<p>7c14 - to implications amend>> Protection of the B3233 and Tapeley House? Tapely House is about 62 m above sea level; how bad is it going to get? from flooding.</p> <p>To context add >> Because of Coastal Squeeze habitat creation policies will be needed to offset this or consider regulated tidal exchange on low lying land in these areas.</p> <p>7c15 - to implications add >> A beach management plan needs to be developed to assist the hold the line policy, these might involve the southerly extension of the dunes along Instow Beach and alteration of highway drainage structures.</p> <p>7c17 - to implications add >> Potential benefits to the Taw Torridge SSSI in the short to medium term through creation of intertidal habitat; with a hold the line policy in the long term there will be coastal squeeze and loss of intertidal habitat from the SSSI especially in Home Farm Marsh.</p> <p>7c19 - suggests splitting in to 2 units (1) Penhill Point to Barnstaple Western Bypass Road Bridge (Bickington); (2) Western Bypass to A39 Bridge.</p> <p>For (1) suggests in ST considering There are opportunities between Penhill Point and the Western Bypass Bridge for intertidal habitat creation in which case Managed retreat is an appropriate policy provided certain properties can be defended.</p> <p>in MT suggests considering Managed retreat should be considered as an option from Penhill Point to the Bypass crossing</p> <p>for (2) suggests from all 3 epochs Undertake maintenance and improvement of the defences to continue to provide protection against the risk of flooding to property and infrastructure, through hold the line.</p> <p>7c21 - in implications add >> Habitat gains may be made through water level management of the fields between the flood defence line and the A361 road</p> <p>7c22 - LT policy add at the newly established defence line in Chivenor.</p> <p>- in implications add >> The MOD has already taken a decision and implemented it to retreat the line to the landward side of the main runway at Chivenor. Parts of the airfield at Chivenor and areas of agricultural land, would be lost as a result of realignment in the medium term,</p> <p>7c23 - in LT add with re-enforced protection to the Great Bank</p> <p>- in implications remove ref to AONB as this area is not in the AONB</p> <p>7c24 - in implications >> remove ref to AONB as not in AONB; add >> Interim preparatory measures may include regulated tidal exchange over Horsey Island.</p> <p>Supports policy approaches of the UNESCO Biosphere Reserve.</p> <p>7c27, 7c29, 7c30, 7c31 - in implications amend text to be >> Support of Biosphere Reserve natural processes and Protection of North Devon AONB from development of defences</p> <p>7c33 - in context amend >> (seawalls and revetments) and acceptable in landscape and biodiversity terms, as groynes</p>	<p>Amended to say Tapeley Park</p> <p>amended text to reflect this.</p> <p>Added text to this effect in 'context' section.</p> <p>Added</p> <p>Disagree about splitting into two units as feel there is little benefit of implementing MR - likely to be more costly to implement than HTL given that will need to re-route the Tarka Trail as a result.</p> <p>Have reflected these comments in discussion of why not chosen MR in draft policy document.</p> <p>This is the existing text, and, based on the above, will not amend it.</p> <p>amended text to reflect this.</p> <p>Amended text to reflect new information at Chivenor, based on this information.</p> <p>Can not add this text about the Great Sea Bank, as potential realignment could impact upon it; a statement such as this would likely prevent realignment policy being implemented.</p> <p>removed ref to AONB.</p> <p>added text to this effect.</p> <p>amended text to this effect.</p> <p>added text to this effect.</p>

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West Somerset DC					I support the findings to date and have no additional comments to make.	no response needed
Environment Agency					<p>Key comments from meeting to discuss Parrett Estuary area>></p> <p>Comwich side, banks about to be replaced and will have a 40 year life; move MR policy to LT from MT to show MR should be considered once these replacement banks need to be replaced again. - Strategy economics showed MR slightly more than HTL to do at present time.</p> <p>Strategy economics/assessment shows Huntspill Sluice will cost about £10m to relocate + has a long residual life. Suggest moving MR from MT to LT.</p> <p>Pawlett Ham, agree with strategy that MR in MT as existing defences need replacing - at that time introduce the surge barrier.</p> <p>Stear - MR option involving RTE in ST could still work; put in context of 'buffering' the transition to NAI in MT/LT. Possible consider mentioning 'localised realignment' at Stockland if needed.</p> <p>- concern over channel breaking through at Steart and increasing flood risk upstream- asked to consider MR on the estuary side of Steart to manage this risk</p>	<p>Agreed - will move MR to LT from MT</p> <p>Agreed - will move MR from MT to LT</p> <p>Agreed</p> <p>After further consideration, not convinced about this, as any intervention at Steart would be contrary to the aims for the area; any flood risk increase to upstream areas would need to be investigated and allowed for in the design of the surge barrier to be introduced in any case.</p>
Environment Agency					<p>i) you have created a new place - it should be Pawlett Hams, not Pawlett Ham, so please can you make sure this is corrected for the final version.</p> <p>ii) It is still rather wordy and I think that there is still a degree of duplication/lack of clarity as to what fits where between the supporting information and the specific policy implications section (could this not also just be policy implications?).</p> <p>iii) I am not sure that all of the issues discussed when we met with you and Graham Quarrier and discussed the Parrett area have been taken on board. We must ensure this area is right before we go out to consultation - and consistent with the more detailed analysis that Graham has been involved in, and I think the issues about economics and power cables etc at Steart have not been fully considered either. Although I do note that you have included the concept of the proposed realignment work at Steart acting as a Buffer to the future no active intervention scenario, I think that the wording does not necessarily reflect the conversation we had.</p> <p>iv) While many of the justifications for and against things describe the economic context, there are not so many that describe the coastal process context - there are some e.g. 7d44 which state ' This would also be likely to have an adverse impact upon adjacent sections by interrupting shoreline sediment transport' but I can't help thinking that there may be more sections where this applies - or that this would be an impact of doing or not doing something. For example, can we prove that the trapping of sediment at Dunster Beach is not having a detrimental effect on Blue Anchor - or if it is what should be done to mitigate it?</p>	<p>i) amended</p> <p>ii) have aimed to make clearer in the introduction this distinction.</p> <p>iii) Have amended the 'buffer' text to explain more clearly; have moved MR from medium to long term as discussed with GQ; except at Pawlett Hams, which is medium term MR in keeping with the strategy.</p> <p>Have added more about the power cables to the implications. But as discussed with GQ, this is already accepted in the strategy policy of MR at Pawlett Hams.</p> <p>iv) that's because in most cases it comes down to the economics; we have identified where defences could be retained from a processes point of view, but are unlikely to attract public funds.</p> <p>Re. Blue Anchor example, it needs further study to investigate this in more detail, and we have stated that.</p>
North Somerset Council					just one minor comment - reference to the A38 in the Weston-super-Mare section is inaccurate. The railway is the closest of the transport assets listed, the A370 is the closest main road. However mire importantly between the M5 and the sea are the homes and businesses of 90,000 people!	amended text

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Strategic Planning and Transport Group (Somerset County Council)					<p>1) Para 2.9 assumes that a surge barrier (for the river Parrett) is acceptable under the Habitats Regulations, but we are uncertain whether anyone one has carried out an assessment of the ecological impacts. (See 7d40 and 7d41 in tables, page 34)</p> <p>2) It is unclear what the options will be if a footpath is lost due to natural causes (what are the legal obligations?)</p>	<p>have added text to mention that surge barrier implementation would be subject to more detailed appraisal, including environmental.</p> <p>Outside scope of SMP.</p>
North Devon DC					<p>1. There is no mention of Fremington Quay or Muddlebridge Defences grid. 51617 33392</p> <p>2. There is no mention of the coastal path in 7c22 & 7c21, there are also transatlantic cables in the path (should not publicise that fact)</p> <p>3. 7d11 There are defences at Lee Bay Grid. 69416 49253</p>	<p>added mention of these specific points.</p> <p>added</p> <p>Have re-visited this section and agree that small length of defence here was missed. Have now considered this but does not change policy; though have added that defence could be maintained if non-public funds available as would have minimal impact on processes.</p>
Countryside & Coast Team (Somerset County Council)					<p>2.9 We are supportive of Steart managed retreat</p> <p>2.10 We are supportive of protection and strengthening of the dunes at Brean but have concerns about how to treat residents on the dunes there.</p> <p>2.10 We have concerns about the migration of the Axe to the South of Brean Down. Are there alternatives, what is the timescale for this? How would access arrangements to Brean Down continue?</p>	<p>Noted</p> <p>Noted - similar concerns as Sedgemoor.</p> <p>This would potentially occur during the latter half of the 50-100 year epoch as defences deteriorate and fail. Access to Brean would need to be considered based on whether or not assets would remain there.</p>
Sedgemoor DC					<p>General comments</p> <p>Some of the managed realignment / no active intervention options affect significant numbers of people – this will inevitably raise concerns, and whilst we may have to recognise that not every stretch of coastline can / should be protected, those directly affected (and their communities and politicians) do need to receive this message with due sensitivity.</p> <p>The Brean area is a particular example where there might currently be some hope that the area can be defended and it will be rather a shock to see proposals biting in the “short-term”.</p> <p>Where policy options are going to involve loss of property, documentation should present sufficient information to allow readers to:-</p> <ul style="list-style-type: none"> • have a clear indication of those areas/properties that are affected • understand the financial implications and liability for property loss • understand why you think there is no sustainable alternative, and/or • set out an alternative if there is one and explain the technical / economic implications. 	<p>We are not actually changing current policy; if anything we are doing more than current policy. SMP1 policy was observe & monitor (possibly Hold) >> was mis-stated in previous version of SMP2 summary document.</p> <p>B&V 2008 Brean to Burnham Coastal Study recommends Do Nothing, though should try to hold the rear line of dunes.</p> <p>We will endeavour to make the specific meaning of the policy very clear in the main SMP document</p> <p>These aspects are all detailed and included in the SMP documents that are published for public consultation; both in the main SMP and/or supporting appendices. Economics will be discussed in Appendix H.</p>

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					<p>As this exercise is supposed to have contained baseline scenarios based on “no active intervention” / “with present management” it would probably be useful to share this for vulnerable sections of coast so that readers can see the extent to which the SMP does endeavour to make a difference in the face of rising sea levels.</p> <p>As pointed out by NDASCAG Chairman Humphrey Temperley at the meeting on 19th June, it is important to ensure that Local Authority elected members are able to support the SMP proposals. At an officer level we are unclear on the basis for some of the “proposed preferred policy options” being preferred and therefore it is unreasonable to look to us to argue for them without better information.</p> <p>Page 6, section 2.10 (Long-Term Vision: Burnham-on-Sea to Anchor Head)</p> <ul style="list-style-type: none"> • 1st para – agree / support • 2nd – agree, but the text should also mention the embankments and sea wall that defend Burnham and Highbridge. • 3rd para – 1st 2 sentences infer a cause: effect relationship for which no evidence has been presented and leads to a property relocation proposal which is likely to be contentious, costly (assuming there are compensation implications) and with apparently uncertain prospects of success (3rd para). Reference is made to “adaptation measures”, without any indication of what such measures may involve. • 4th para – given the stated aim of avoiding widespread flooding on the Somerset Levels why would set-back defences be more sustainable than holding the existing line? <p>Page 42, 7d37 – Fenning Island to Combwich Text in column 7 (Supporting Information) appears to require specific additional text elsewhere:</p> <ul style="list-style-type: none"> • Column 3 (Short Term), add “Investigate implications of moving to a NAI policy” • Column 6 (Specific Policy Implications), add “Possible movement of low-water channel” <p>Page 43, 7d39 – Combwich to Bridgwater (Parrett West)</p> <ul style="list-style-type: none"> • Column 4 (Medium Term), amend 2nd sentence to “Implement any previously identified managed realignment opportunities and investigate further managed realignment opportunities to implement in the long term.” • Column 6 (Specific Policy Implications), 3rd sentence – “many properties” presumably could include Chilton Trinity and the north side of Bridgwater – might be helpful to be more specific about the scale of benefit. • column 7 (Supporting Information), 4th sentence – In respect of the surge barrier being a “key factor”, should the word “prior” be inserted before “construction”? 	<p>We have done both the NAI and WPM assessments - these will be included in the main SMP summary and appendices.</p> <p>We have included much of the NAI information in summary form in the latest version of this policy document.</p> <p>Reasoning has been included in the revised version of the document that was re-issued on 1st July 2009 - comments suggest this revised version may not have been seen??</p> <p>amended</p> <p>This is intended to be a 'long term vision' that sets the broader context to the detail in the policy summary tables (section 4). We recognise the social/economic implications and therefore preferred policy in short term is to try to minimise impact of coastal change, through the recommended implementation of dune management, thereby allowing time for measures to be investigated.</p> <p>There is no mention of 'adaptation measures' in this section.</p> <p>To HTL effectively here would require hard defences, which would be costly and detrimental to environment (and potentially adjacent sections of coast) - this is explained in latest version of policy summary.</p> <p>added similar text to adjacent section.</p> <p>Added</p> <p>This has been superseded by the revised version of the policy options issued on 1/7/09, following discussions with Parrett Estuary FRMS project manager.</p> <p>Amended</p> <p>amended</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
					<p>Page 43, 7d40 – Bridgwater (upper Parrett Estuary)</p> <ul style="list-style-type: none"> • Column 3 (Short Term) – reference to “eventually replacing these with larger structures” is surely mistaken – the surge barrier is intended to avoid this. • Column 6 (Specific Policy Implications), 3rd sentence – the river at Bridgwater is not within the designated sites. • Column 7 (Supporting Information), 1st sentence - might be helpful to be more specific about the scale of benefit (thousands of properties at risk in Bridgwater). • Column 7 (Supporting Information), – is it not the case that the barrier is vital because of sea level rise, irrespective of which SMP policy is proposed for the outer estuary? <p>Page 44, 7d41 – Bridgwater to Dunball</p> <ul style="list-style-type: none"> • Column 4 (Medium Term) – reference to “eventually replacing these with larger structures” is surely mistaken – the surge barrier is intended to avoid this. <p>Page 44, 7d42 – Dunball to River Brue</p> <ul style="list-style-type: none"> • Column 3 (Short Term) – given what is said in the final para of column 7, surely there needs to be reference to those more detailed studies. • Columns 4 and 5 (Medium and Long Term) – proposed MR locations appear to pre-judge the findings from the Short Term studies. • Column 6 (Specific Policy Implications), 5th sentence – given the scale of the existing tidal sluice and the location of the Huntspill STW (serving Burnham Highbridge and surrounding area) surely “hold the line” in that vicinity is more likely – suggest text needs to be revised. • Column 7 (Supporting Information), 5th para – surely rather than “existing defence line” it’s the “Parrett Estuary low-water channel” that could be affected. <p><u>How will proposed policy options for Units 7d36 to 7d42 affect the navigable channel of the River Parrett and access for commercial shipping to berthing facilities at Comwich and Dunball ?</u></p> <p>Page 45, 7d43 – Burnham-on-Sea and Berrow</p> <ul style="list-style-type: none"> • Column 1 (Proposed Policy Unit) – add Highbridge (unit starts here) • Columns 3 & 4 (Short and Medium Term) – need reference to existing embankment defences on the north side of the Brue Estuary at Highbridge and the need for improved defences in the vicinity of Highbridge boatyard. • Column 7 (Supporting Information), 1st sentence – add Highbridge. <p>Page 45, 7d44 – Berrow (north) to Brean (north)</p> <p>Context, proposed policy and policy implications all raise issues</p> <ul style="list-style-type: none"> • Northern boundary of Policy Unit is shown as being approximately opposite Weston Road. Reference in all 3 epochs to “removal of some of the seaward properties” would therefore appear to refer to property south of the Weston Road junction. But as there is no equivalent text in the adjoining Policy Unit (7d45) we suspect that the Policy Unit boundary was intended to be about 1km further north at the end of the present built-up area – if this was an error please move the line. • The position of the boundary probably has significant effects on the extent of residential and commercial property affected – the further south it is the greater impact. 	<p>no its correct - Parrett FRMS states that 're-engineering and improving banks' in this area will be required in short term before any surge barrier would be constructed in order to retain required levels of protection.</p> <p>Amended following revisiting data to remove mention of these features.</p> <p>amended text</p> <p>Yes, barrier implementation needed for sea level rise; SMP policy is stating that changes to the outer estuary make the need for a barrier even more important.</p> <p>depends on location of barrier - amended text to reflect this.</p> <p>Already added to revised policy summary document issued on 1/7/09</p> <p>only 'potential' sites identified. Agree that these are subject to further study - text to this effect included in column 7.</p> <p>Have moved MR from medium to long-term in this area following discussion with EA - included in revised version of document issued on 1/7/09. Realignment would likely occur once the Huntspill Sluice reaches end of effective life; regarding STW, then long-term policy should inform future land-use planning, once the STW reaches the end of its life and needs upgrading/replacing.</p> <p>text amended to mention about low water channel.</p> <p>Text about this included.</p> <p>added</p> <p>amended</p> <p>added</p> <p>Have adjusted boundary northwards to be at boundary between hard defences an soft (dune) defences - as per B&V 2008 study.</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
					<ul style="list-style-type: none"> • Wherever the line is drawn, this unit is currently predominantly backed by dunes. The dune belt narrows progressively northwards. At the northern end of Brean village (currently depicted as lying in unit 7d45) where the dune belt is very narrow, a number of properties have private defences (gabions and other structures). At the southern end of Policy Unit 7d44, the adjacent Berrow dunes section was described in 7d43 as “not predicted to be compromised over the next 100 years”. With this as the context for the opposite ends of this unit, it seems reasonable to postulate that the 2nd para under Column 7 (Supporting Information) is overstated – and that far from requiring “construction of very large, hard defences” and resulting in “little or no beach left” (3rd para) there is a potential alternative scenario of installing a limited amount of new defences as far south as is necessary in each epoch. • We are concerned that there may be insufficient understanding of the past and future evolution of the dunes and that, as for some other units, a “further study required” approach might also have been appropriate in the short term. [The current text appears to consider that the narrow dunes can be “restored” if property is “removed”, but with a low level of confidence that this will be sustainable in the long term • Reference to a “secondary defence inland” in the long term (Columns 5 and 7) begs the question: “how far inland?” – can we have an indication please. <p>What is the justification for the position of the boundary between Policy Units 7d43 and 7d44 given that there are different policies proposed for similar sections of coast.</p> <p>Page 47, 7d45 – Brean (north) to Brean Down Comments below assume that the unit boundary is further north than depicted on plan – if the boundary does not move then text will need to change substantially in respect of affected properties.</p> <ul style="list-style-type: none"> • Column 5 (Long Term) – given that this is proposed in association with a set-back defence at Brean, is this not “managed realignment” (rather than NAI)? – this comment is also applicable at Columns 6 and 7. • Column 6 (Specific Policy Implications) – need to add an extra point covering loss of road access to Brean Down (National Trust property, popular walk, panoramic views). • Column 7 (Supporting Information), 3rd para – given the width of the existing inter-tidal area, is the loss of beach in the long term (if hard defences were replaced) actually likely or is this overstated? <ul style="list-style-type: none"> • Column 7 (Supporting Information), final para – reference to a need for further study of the sediment circulation in Bridgwater Bay is surely a matter which should be undertaken in the short-term and then inform the long-term strategy for the whole of this coastal area (not just unit 7d45). <p>Page 48, 7e02 – Axe Estuary west bank</p> <ul style="list-style-type: none"> • Column 5 (Long Term) – given that this is proposed in association with a set-back defence at Brean, is this not “managed realignment” (rather than NAI)? – this comment is also applicable at Columns 6 and 7. • Column 6 (Specific Policy Implications) – need to add an extra point covering loss of road access to Brean Down (National Trust property, popular walk, panoramic views). • Column 7 (Supporting Information), final para – reference to a need for further study of the sediment circulation in Bridgwater Bay is surely a matter which should be undertaken in the short-term and then inform the long-term strategy for the whole of this coastal area (not just unit 7d45 / 7e02). 	<p>Text amended to reflect that not all of the frontage would require defences. Hard defences would still have implications on natural functioning of the system and have potential impacts on adjacent frontages.</p> <p>Agree - this builds on the B&V 2008 report that recommends that Do Nothing should be the policy for 100 years for this area, but that for protecting Somerset Levels (not necessarily Brean), need to hold the rear line of dunes. To achieve this would best be one by having the dunes as natural as possible to allow them to adapt, but ultimately they may not be able to provide a robust natural defence, in which case a set back defence would be needed. Text has been changed to make this clear that set back defence is to protect the levels. How far inland requires further study - mentioned in text.</p> <p>based on social and economic considerations.</p> <p>No, the realignment and maintenance relevant to here will be covered by the realignment policy in 7d44. This will be made clear in the draft SMP policy statement, which will deal with these 2 sections together.</p> <p>Amended text</p> <p>It's the upper sandy beach that is considered. Under SLR, the low slope of the foreshore would mean upper beach being covered at most states of the tide. Presence of hard defences would accelerate this as shore position is fixed, as well as causing issues of scour and lack of dune interaction during storms.</p> <p>Agreed. This is noted in the text, and would be included in the Action Plan produced at the end of the SMP process.</p> <p>No it is not MR here >> that would imply spending money in this unit - refer to comment above where realigned defences would be dealt with under unit 7d44</p> <p>amended text in 7d45 to deal with this. Specific access from this unit is not an issue.</p> <p>See comment above about this.</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
Exmoor National Park					<p>We make our comments below in the context of the statutory purposes of National Park designation which are:</p> <ul style="list-style-type: none"> • To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and • To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public; <p>In pursuing these purposes, the National Park Authority should foster the economic and social well-being of local communities within the National Park. Given the above we consider that we will require further information and discussions to ascertain the implications of the Plan proposals on the National Park. At this stage, however, we must object to the plan. We would, therefore welcome discussions on the various points we raise below.</p> <p>In particular we object to:</p> <ul style="list-style-type: none"> • proposed preferred policy 7d16 (Porlock Weir) that post-2025 to allow natural coastal evolution to occur by moving towards a policy of no active intervention. This would allow a settlement in the National Park to go undefended. <p>Such an approach would have a number of implications which will require discussion and consultation. We would, therefore, want as well as having discussions with you to be sure that detailed consideration has been given to all options through local public engagement. There will be potential opportunities for the Environment Agency to present the facts and implications and to engage in a wider public discussion on the issues and options for the stretch of coast at Porlock Weir through our Local Development Framework consultation due to run from November 2009 and/or the Porlock Bay Management Plan being led by the National Trust. These opportunities would enable a debate to take place and for views to be fully considered before taking any future coastal management position.</p> <p>Given that the proposals are likely to impact on several Sites of Special Scientific Interest (SSSI) and the Exmoor Heaths Special Area of Conservation (SAC) we will require more details before being able to offer an informed opinion on the possible impact on the sites in question. It will, of course, be essential that Natural England is consulted over the proposals.</p> <p>We particular draw your attention to the following points:</p> <ul style="list-style-type: none"> • Section 7d11 (Combe Martin to Lynmouth) states that there will be “no implications to development, historical, conservation or land areas”. It fails to mention the presence of the West Exmoor Coast and Woods SSSI, Exmoor Coastal Heaths SSSI and Exmoor Heaths SAC. • Section 7d13 (Lynmouth to Foreland Point) states that there will be “no implications to development, historical, conservation or land areas”. It then goes on to say that there will be a potential loss of terrestrial habitat due to natural processes from Exmoor Coastal Heaths SSSI and Exmoor Heaths SAC. This seems contradictory. 	<p>Any defences here would be unlikely to attract public funding, but also, any defence improvements here would have significant impacts on coastal processes and the natural functioning of the system which is the aim of ongoing management in the rest of Porlock Bay. Any new defences would also need to be much larger and so have more significant landscape impacts</p> <p>This is all part of the SMP process.</p> <p>EA and NT already consulted and continue to be so through SMP development.</p> <p>NE are being consulted as part of the SMP development process, as they have been since the start of the SMP. SSSIs/SAC and all other designations thoroughly considered in the appraisal process. This info will be included in the Draft SMP documents, but can be made available if required.</p> <p>amended</p> <p>amended</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
					<ul style="list-style-type: none"> • Section 7d14 (Foreland Point to Gore Point) states that there will be “no implications to development, historical, conservation or land areas”. It fails to mention the presence of Exmoor Coastal Heaths SSSI or Glenthorne SSSI. A small amount of the SAC also comes under this area. Culbone Woods are not mentioned as they are a County Wildlife Site rather than SSSI (i.e. a non-statutory designation). However they are considered to be of SSSI quality. • Sections 7d15 (Gore Point to Porlock Weir), 7d16 (Porlock Weir) and 7d17 (Porlock Weir to Hurlstone Point) run through Porlock Ridge and Saltmarsh SSSI. However section 7d15 states that there will be “no implications to development, historical, conservation or land areas”. It, however fails to mention the presence of the SSSI. Section 7d16 does mention the presence of the SSSI and states that the natural processes may impact positively or negatively on Porlock Ridge and Saltmarsh SSSI. Clearly research is needed to determine whether the impact will be positive or negative. The same would be true for section 7d17. • 7d18 (Hurlstone Point to Minehead west) states that there will be “no implications to development, historical, conservation or land areas”. It then goes on to say that there will be a potential loss of terrestrial habitat due to natural processes from Exmoor Coastal Heaths SSSI and Exmoor Heaths SAC. This again seems contradictory. 	<p>Amended</p> <p>Amended</p> <p>Agreed. Mentioned in text that further study needed.</p>
Devon CC					<p>Here are comments from our Historic Environment team on the current draft...</p> <p>"As indicated on the attached list, the report does not appear recognise that there is a significant amount of non-designated but nationally or regionally important archaeology that may potentially be affected by the 'no active intervention' and 'managed realignment' options. Therefore, how this will be dealt with by stakeholders - national agencies, local authorities, landowners, local communities - has not been addressed by the report"</p> <p>7c02 – Lundy Omits potential impact on non-Scheduled prehistoric features</p> <p>7c03 – Hartland Point to Clovelly Omits potential impact on Mesolithic artefact scatters at East Titchberry and Brownham Cliff, and Listed Buildings near Blackchurch Rock and north + north-east of Clovelly Court.</p> <p>7c05 – Clovelly to Rock Nose Omits potential impact on Peppercombe Castle promontory fort and Portledge Mouth Fishpond. Omits potential impact on Listed Buildings if Bucks Mills is threatened</p> <p>7c07 – Northam Burrows Omits potential impact on submerged forest, palaeoenvironmental deposits and Mesolithic artefacts on Westward Ho! beach, and on palaeoenvironmental deposits (hoof prints) at Pebble Ridge. Omits potential impact on at least two wrecks known to be intermittently buried on the beach. Omits potential impact on WWII defensive features.</p> <p>7c10 – Appledore to Northam Omits potential impact on known (and possible unknown) hulks, and potential for surviving features related to fishery activities.</p> <p>7c14 – Torridge Bridge to Instow (Hold the line) Omits 'Protection of (Registered) Tapeley Park'.</p> <p>7c16 – Instow to Yelland Omits potential impact on (Scheduled) Yelland Stone Row, and on fish weirs and extensive prehistoric artefact scatter.</p>	<p>Have added in mention of non-designated archaeology to implications tables where appropriate. Some of the comments talk about the foreshore/inter-tidal areas which are not subject of management under the SMP.</p> <p>This may not be the full detail in all cases for this summary document, but that would be included in the draft SMP documents.</p>

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
					<p>7c17 – Home Farm Marsh Omits potential impact on (Scheduled) Yelland Stone Row, and on fish weirs and extensive prehistoric artefact scatter.</p> <p>7c22 – West Ashford to Braunton Omits potential impact on fish weirs and WWII structures at Chivenor.</p> <p>7c23 – Braunton to Horsey Island Braunton Great Field is one of the few surviving examples of open-field cultivation in the whole of Britain, and as such is of National (not Local) importance.</p> <p>7c25 – Horsey Island to Crow Point Omits potential impact on WWII training area.</p> <p>7c24 – Crow Point & Crow Neck Omits potential impact on WWII training area.</p> <p>7c27 – Braunton Burrows Omits potential impact on WWII training area.</p> <p>7c28 – Saunton Down Omits potential impact on WWII training area and cliff-face burials.</p> <p>7c29 – Croyde Sands Omits potential impact on WWII training area and cliff face burials.</p> <p>7c30 – Middleborough Hill Omits potential impact on prehistoric artefact scatters and knapping site, and WWII structures</p> <p>7c31 – Middleborough Hill to Baggy Point Omits potential impact on prehistoric artefact scatters and knapping site, and WWII structures</p> <p>7c33 – Putsborough Sands and Vention Omits potential impact on WWII training area.</p> <p>7c34 – Vention to Woolacombe Beach Omits potential impact on WWII training area.</p> <p>7c35 – Woolacombe Beach Omits potential impact on WWII training area.</p> <p>7c36 – Woolacombe to Morte Point Omits potential impact on WWII training area.</p> <p>7d01 – Morte Point to Lee Omits potential impact on WWII training area and Bull Point Lighthouse</p> <p>7d05 – Ilfracombe to Hele Beach Omits potential impact on (Scheduled) Hillsborough Promontory Fort</p> <p>7d11 – Combe Martin to Lynmouth Omits potential impact on (Scheduled) Roman fortlet and (Listed) boundary stones NW of Trentishoe Down. Omits potential impact on prehistoric features on Holdstone Down.</p> <p>7d13 – Lynmouth to Foreland Point Omits potential impact on (Scheduled) Countisbury Castle and (Listed) Foreland Lighthouse.</p> <p>7d14 – Foreland Point to Gore Point Omits potential impact on (Listed) Garden Cottage, (Listed) Glenthorne and (Listed) limekiln.</p>	

Organisation/Address	Unit(s) commenting on	Short Term	Medium Term	Long Term	Comment(s)	Response(s)/Action(s)
Torrige DC					<p>7c05 Clovelly to Westward Ho! - Properties would not be at risk of flooding from the sea at Bucks Mill. The properties are set at the top of the cliff, and are only subject to coastal erosion.</p> <p>7c06 Westward Ho! - replacement of sea defences with 'larger structures' presumed to mean higher structures with new defences being constructed westwards to Rock Nose</p> <p>7c07 Northam Burrows - where managed realignment of the Pebble ridge is required, guidance and advice will be necessary to ascertain the correct 'alignment'. - it was felt that the construction of an 'earth embankment' would be impractical in this area, and from experience 'rock revetments' have scoured and we feel would not provide adequate protection without the aid of hard defences. - more rigid timescales for the provision of defences will be required. Defences will need to be constructed before the Pebble ridge realigns.</p> <p>7c08 Skern Salt Marsh to Appledore - proposed policy is for 'maintenance to existing revetment defences', by provision of more rock armour? - paragraph '...hold the line is required to support the adjacent managed realignment in 7c07 which will create a greater area of habitat offsetting this loss.</p> <p>Needs further detailed assessment.' It was felt that this assessment would be crucial before implementing this policy and any recommendations.</p> <p>7c12 Upper Torridge - states 'insufficient information available to determine exactly which area of the Upper Torridge will be subject to which policy.' Again this information is crucial in implementing a more detailed policy for the susceptible areas along the East and West banks of the Torridge. It has been assumed that the reference to the developing strategy is the SFRA2.</p>	<p>amended</p> <p>No, this policy does not envisage extending defences to Rock Nose, merely bolstering the western end to reduce outflanking risk. This has been clarified in the text.</p> <p>Ridge would be allowed to evolve naturally to a natural realigned position. The 'Managed' part of this is addressing the flood risk that this would pose.</p> <p>We feel that hard structure would be highly reflective and cause increased erosion of the pebble ridge. We suggested embankments or revetments as they have a lower reflectivity. This would need to be looked at in more detail and text amended to clarify this. Possibly. SMP only suggests ways of implementation. Implementation itself is dealt with by more detailed local study following setting of SMP policy.</p> <p>See comment above</p> <p>No, strategy is the Taw-Torridge Estuary Strategy being led by the Environment Agency. Have clarified in the text.</p>

Annex B.5 – Responses from Public Consultation and Actions Taken

The table below presents the comments received on the draft SMP2 as a result of the public consultation process. Comments have been grouped by either section of report to which they relate and/or specific policy units. Against each comment is the response and/or action taken by the project team.

Please note, individual contributors names and positions are not published in this consultation draft. Please also note that the policy unit names and numbers shown as section headers relate to the conventions as they were at the time of the consultation draft. These have been amended in some areas and may not directly correlate to the revised policy unit names and numbers included in the final SMP.

General Comments

Comments from?	Comments	Action/Response
Resident of Bideford	As far as the broad principles of the SMP are concerned, I am in general agreement. I accept that the general taxpayer should not be committed to an open-ended policy to defend the line at every point. I also acknowledge that the managed retreat and do nothing options will lead to significant changes in the coastline, if not within my lifetime then within that of my grandchildren.	Noted – no action required.
South West Coast Path	As we do not have the capacity or local knowledge to make specific comments about sections of coast, we have produced on behalf of the SWCP partnership a position statement for submission to each 4 SMPs that cover part of the SW Coast Path National. It aims to demonstrate ways in which the path is affected by coastal change and coastal defence management and to clarify an optimum approach for the management of the South West Coast Path where it coincides with holding or advancing the line scenarios. As it is too big to email, please can you download a copy from: http://www.southwestcoastpathteam.info/key_docs/SMP.doc	SWCP position statement was considered in the development of policy options. There are no policy areas where a defence policy is based solely on protection of a footpath, but where a footpath may be affected (and therefore where mitigation or adaption measures may be required) this has been recognised in the implications table. No further action required.
Unattributed (comments recorded from Consultation Events)	Buck's Mill is spelt incorrectly. The wording for the Instow policy needs to be more thorough and better explained.	We have corrected spelling to be 'Bucks Mills' throughout the documents. We have reviewed and revised text relating to Instow to clarify what is intended in this area.
Green World Trust	We disagree with the SMP policies because we are in complete disagreement with the principle of going forward with piecemeal shoreline management. In your Consultation Summary in the section headed "Sustainable Management" your first paragraph defines sustainable long term management policies as: "Those which take account of the relationships with other defences, developments and processes, and which avoid, as far as possible, committing future generations to inflexible and expensive options for defence" (DEFRA 2006). We are of the opinion that the construction of a barrage between Minehead and Aberthaw would resolve the majority of issues concerned with the shoreline, and that this would be in keeping with the above statement. Whilst the construction of such a barrage would be costly in the short term, the returns generated by the provision of renewable energy would offset these costs and virtually eliminate the need for sea defence. We were very disappointed when we visited the exhibition to find that your representatives refused to discuss the barrage and its potential implications on shoreline management. This is contrary to your stated policy to take account of the relationships with other developments and processes.	We agree that a barrage scheme could also provide a defence role in the future; the extent would, however, depend upon the location and design of the barrage. However, much more work is needed to assess the pros and cons of a Severn tidal power scheme before the government can reach a decision on whether to go ahead with a scheme and if so, which scheme and on what terms. It was not, therefore, considered appropriate for the SMP to pre-guess the outcome of these studies. As part of detailed investigations of potential options of the Severn Estuary, assessment of the implications for flood and erosion risk management of the shoreline would have to be carried out in any case, and that would draw upon information included in the SMP, thereby establishing a link between the two plans. The SMP process also promotes revision of the plan, on a 5 to 10 year basis; therefore, future revisions of the SMP would need to consider Severn Estuary options if they were at more detailed and well developed stage than they are at present. Further information on the Severn Tidal Power Feasibility Study is available at www.decc.gov.uk/severntidalpower or www.wales.gov.uk/severntidal .
Resident of postcode EX32	I am concerned at the premise on which your sea-level predictions are based. Generally 1 degree of Global Warming=7-8 m of sea level rise (SLR). The EU talks of accommodating a 2 degree increase i.e. 16m SLR. Given that all predictions to date have foreshortened (by decades!) aren't you being naïve in talking 1.5m over 100 yrs. Even the IPCC are agreeing current estimates are inadequate. ANY OTHER COMMENTS: A worst case scenario (WCS) should be considered into the thinking. It is difficult to judge the appropriateness of an action if you are unaware of a WCS.	We are uncertain where the figures quotes by Mr Hawes have been derived. The SMP has used the current Defra (2006) guidance which provides advice on climate change allowances and sensitivity ranges, in support of Planning Policy Statement 25 (PPS25) 'Development and Flood Risk', and is based on the maximum of the global sea level range given for the high (SRES A1F1) climate scenario in the IPCC Third Assessment Report, along with vertical land movement estimates based on geological data. It is acknowledged that this data does not take account of 'catastrophic changes', such as the collapse of the Thermohaline Circulation or the collapse of the West Antarctic Ice Sheet. The latest climate change estimates, provided by UKCP09 provides a low probability, high impact range for sea level rise around the UK, known as the High-plus-plus (H++) scenario. This provides some indication of the impact of large-scale ice sheet melting on sea level rise, but even under this scenario, the prediction of sea level rise around the UK coast is between 0.93m and approximately 1.9m by 2100, not 16m suggested by Mr Hawes. UKCP09 also state that the top of this range is very unlikely to occur in the 21st century.
PDRF/Lecturer at	We are a group of researchers that actively study coastal flooding and erosion and the impacts of climate	The SMP policies have been developed considering the long-term processes using the best available information

<p>University of Plymouth - Centre for Coastal and Ocean Science and Engineering</p>	<p>change in increasing flood/erosion risk.</p> <p>We would like to see better 'evidence-based' decision-making and 'science-led policies/regulations that attend to the principles of integrated coastal management as described by EU recommendations.</p> <p>Long-term planning based on management options decided using the best knowledge available to support the sustainable use of coastal areas.</p> <p>Hold the line option might have encouraged occupation of high risk areas that in scenarios of rising sea levels and increased storminess are unlikely to be sustainable.</p> <p>The present options of no intervention, hold the line, advance the line and management realignment do not cover the wide range of coastal situations. It is time that other options, such as planned relocation from risk areas, are considered as well.</p>	<p>and considering a wide range of environmental, technical, social and economic factors. We therefore considered them to be both 'evidence-based' and 'science-led'. It is also essential, however, that policies are realistic and take due consideration of existing legislation and economic guidelines.</p> <p>All SMPs around England and Wales follow guidance produced by Defra, which is available from Defra's website. There are four policy options available to the SMP, but these do not preclude the consideration of adaptation and mitigation and reference has been made in the policy statements where policies will need to be supported by other measures such as relocation of assets or adaptation measures.</p> <p>Whilst the SMP has considered the potential impact of rising sea levels, there is currently very limited evidence to suggest that storminess will increase in the future or that it is associated with man's activities.</p> <p>Whilst we have noted the comments and will ensure that the needs for adaptation and mitigation are recognised by the SMP, these comments question the principles of the Shoreline Management Plan process, which is an issue for the EA to consider, and therefore no further action is required necessary by this SMP.</p>
<p>Chairman, Taw Torridge Estuary Forum</p>	<p>Thank you for including the Taw Torridge Estuary Forum in every stage of consultation on the North Devon and Somerset SMP.</p> <p>We have nothing further to add to our earlier submissions.</p>	<p>No action required.</p>
<p>The British Association for Shooting & Conservation</p>	<p>BASC are grateful for the opportunity to respond to this consultation and look forward to working with North Devon and Somerset Coastal Advisory Group/ Environment Agency as the process moves forward.</p> <p>BASC was founded in 1908 as the Wildfowling Association of Great Britain and Ireland and is the UK's largest shooting association. BASC is constituted as an Industrial and Provident Society and has a membership in excess of 130,000. BASC is the representative body for sporting shooting in the UK and the largest field sports organisation. It aims to promote and protect sporting shooting and the well being of the countryside throughout the UK and overseas. It actively promotes good firearms licensing practice, training, education, scientific research and practical habitat conservation. BASC believes that all who shoot should conduct themselves according to the highest standards of safety, sportsmanship and courtesy, with full respect for their quarry and a practical interest in wildlife conservation.</p> <p>BASC's expertise in shooting matters is widely recognised and it is routinely consulted by a variety of government departments and agencies (including the Home Office, Defra, LANTRA & The Health and Safety Commission) and other statutory and non-statutory bodies.</p> <p>BASC represents approximately 165 affiliated wildfowling clubs in the UK with a total membership of around 15,000 individuals. Wildfowling clubs manage more than a quarter of a million acres of land (104,000 hectares) in the UK, 90% of which is designated as sites of special scientific interest (SSSI). In England, Wales and Northern Ireland BASC affiliated wildfowling clubs lease some 700km of foreshore from the Crown Estate. Increasingly, wildfowling clubs are buying farmland that had previously been drained to allow farming. These areas are now being returned to wetland for the benefit of wildlife and quarry species. This complements Environment Agency managed realignment schemes and flood risk management.</p> <p>Wildfowling is the pursuit of quarry species of ducks, geese and waders with a smoothbore gun, principally on estuaries and coastal marshes but also on large wetlands further inland. Wildfowling is usually a solitary activity and in England and Wales takes place from 1st September to 20th February on the foreshore and ending 31st January inland. Wildfowling is a recreational benefit for local communities and wildfowling clubs provide a focus for wardening of land, monitoring of wildfowl and habitat protection and improvement. The Birds Directive (1979) fully recognises the legitimacy of hunting of wild birds as a form of sustainable use. Wildfowling is an activity that provides significant social, cultural, economic and environmental benefits in the UK.</p> <p>Management of the wildfowl resource by local communities is integral to the management of wildlife on our coasts and an important aspect of our coastal heritage. Land managed for wildfowling often plays an important role in local flood management risk strategies and wildfowling clubs are well placed to deliver continued benefits to such strategies, especially in the management of land involved in managed realignment projects. Wildfowling clubs manage land involved in Environmental Stewardship and Higher Level Stewardship schemes. BASC encourages more clubs and members to participate in such projects. We recommend greater empowerment of local communities in the management of land as a long-term strategic benefit to flood risk management.</p>	<p>Development of policy options for SMP considers a wide range of factors including social and environmental ones and we thank BASC for their input.</p> <p>These comments require no further action.</p>

	<p>As stated, many clubs undertake conservation work on the land on which they shoot, actively participating in Environmental Stewardship schemes for example, and undertake regular litter removal and clean-up work on the coast. Natural England (NE), which is the statutory conservation agency for England, recognises the value of shooting to conservation.</p> <p>BASC recognises the importance of the coastal environment and the need to balance different user needs. The North Devon and Somerset Shoreline Management Plan Review should recognise the long standing and culturally important activity of wildfowling and the sensitive nature of the habitats over which wildfowlingers shoot.</p> <p>In 2004, an estimated 2.6 million work days were undertaken on habitat and wildlife management as a result of sporting shooting in the UK. This is the equivalent of 12,000 Full Time Equivalent jobs.</p> <p>As a result of sporting shooting, £250 million was spent on conservation activities and that shooters themselves contributed 2.7 million work days, the equivalent of 12,000 full time jobs. £8 million alone was spent on tree planting. The total value of sporting shooting to the UK economy in the same year was £1.6 billion. (Source 2006. PACEC. Economic and Environmental Impact of Sporting Shooting in the UK. Available online at www.shootingfacts.co.uk) , Given this level of involvement, we hope that developing policy will recognise the important contribution shooting makes to the environment, and that the activities of those involved will not be inadvertently restricted.</p> <p>BASC acknowledges the visions outlined in the consultation document for North Devon and Somerset Shoreline Management Plan Review. BASC believes this process complements existing government coastal initiatives which BASC and its members are actively involved in at national and local levels e.g. Marine Bill, Coastal Change Policy, Natural England and Environment Agency programmes.</p>	
Resident of Weston-super-Mare	<p>I am emailing after reading in the local paper, that you would like peoples views.</p> <p>My own view concerns the proposed Severn Barrage.</p> <p>I do not think this should be built because:-</p> <ol style="list-style-type: none"> 1) It may ruin W-s-M's lovely sandy beach because of silting up 2) Water may get stagnant in the bay. 3) It would look ugly, as would the pylons leading to it. 4) Any road/rail link on top would look unsightly and cause air/noise pollution. 5) It may cause flooding in low lying Somerset coastal areas. 	<p>The SMP is not dealing with the issue of the Severn Barrage and so these comments are not relevant to the development of policy for the SMP at this time.</p> <p>Further information on the Severn Tidal Power Feasibility Study is available at www.decc.gov.uk/severntidalpower or www.wales.gov.uk/severntidal and there will be a consultation process associated with the scheme in due course.</p> <p>No further action required.</p>
Parents Concerned About Hinkley	<p>I'm on pay-as-you-go and it would have been helpful if these forms would print out for completion by hand. Also the forms aren't brilliant e.g. the tab key doesn't move from one cell to the next.</p>	<p>The CSG will consider improving how forms/information can be accessed in the future.</p> <p>A printable .pdf version of the form was added to the website when this comment was received.</p>
Coastwise North Devon	<p>The policy for areas in which Coastwise North Devon has an interest (7c03 to 7d10) is a combination of managed change, natural evolution and near term monitoring to allow longer-term plans to be made.</p> <p>We support this approach for the Hartland Point to Combe Martin coast because any other policy would be both impractical and intrusive, although existing sea defences at Lee, Ilfracombe and Combe Martin need to be maintained, and their effectiveness monitored.</p>	<p>Comments noted but require no action.</p>
RSPB	<p>We have some general comments, below, on the approach taken in the SMP Review, in particular relating to the consequences of SMP policies on wildlife habitats, notably those protected as Natura 2000 and Ramsar sites.</p> <p>In general, the RSPB supports SMP policies for no active intervention and managed realignment, where they offer the prospect creating new priority wildlife habitats. The SMP must ensure the coherence of the Natura 2000 network is maintained, but also offers opportunities to contribute to the delivery of UK Biodiversity Action Plan (BAP) habitat and species targets.</p>	<p>Comments from RSPB are addressed in the relevant sections of this feedback report and not specifically here. Please refer to other parts of this document for full responses to specific comments.</p>

Somerset County Council	<p>Heritage</p> <ul style="list-style-type: none"> In the Somerset section it severely underestimates the potential impact upon significant archaeological remains in virtually every coastal section, even in the Steart area where the EA have recognised the very significant potential impact of the realignment scheme upon the historic environment The SMP does not take account of the fact that the present sea defences along part of the Somerset coastline are of Medieval and early post-medieval date and are therefore significant archaeological sites in their own right. Thankfully this is usually recognised at a scheme level. By holding the line in the face of sea level rise the EA is directly contributing to the erosion of the inter-tidal area in front of the defences and the significant archaeological remains which exist there, eg. in Blue Anchor bay, Minehead Bay and Bridgwater bay. This has not been recognised as an issue in the SMP. <p>Coastal Access</p> <p>Coastal access to be introduced through the Marine and Coastal Access Act 2009 will comprise of:</p> <ul style="list-style-type: none"> the route of a 'trail'; land which qualifies as spreading room-seaward and landward; land categories automatically excepted from coastal access rights land management considerations which will include the need for any restrictions, exclusions or diversions. <p>As the lead authority for the south west, we are already involved in meetings with Natural England and the other pilot authorities to work up a methodology for the above so we can proceed with implementation as soon as the relevant section of the bill is enacted.</p> <p>Within the 'scheme' there is provision for managed coastal realignment and non intervention which gives examples of how the trail and any spreading room will be dealt with if necessary. Coastal Access provisions will not be a factor in determining shoreline management policies or the strategies that implement them, though individual schemes may make special provision for coastal access where these can be accommodated within the overall objectives for flood or coastal erosion risk management.</p> <p>Section 55b of the 1949 National Parks and Access to the Countryside Act provides powers for the route of the trail to move inland as the coast changes, this is known as 'roll back'. The distinction between roll back and future variation of the trail to accommodate coastal change in certain areas without approval by the Secretary of State.</p>	<p>Heritage – we recognise that there have been issues with the data presented and therefore we have reviewed data received and re-obtained and re-plotted data. The implications tables have been reviewed on the basis of re-obtained data received, to address the issues raised. In many locations, the policy has not changed as a result of this review, but in locations where assets are likely to be lost or damaged, either by coastal erosion, flooding or intertidal narrowing, we have ensured that the need to consider mitigation measures, such as photographic mapping, is duly noted. As recognised in the comments, full consideration of mitigation measures is usually undertaken as part of strategies or schemes.</p> <p>Bullet point 3 has been reflected as an impact in the SEA Tables.</p> <p>A very significant potential impact would be classified in SEA terms as the loss of a Scheduled Monument. Therefore if it has not been listed as such by the Authority we have no way of knowing the sites importance. Somerset County Council has to go through the SMP site by site to infer the sites importance where not designated to be able to reflect this concern in the SEA. Refer to EA Historic Approach to SEA. We have added a generic statement within the SEA to say these will be dealt with at Project Level.</p> <p>Coastal Access – we have considered the implications of the Marine and Coastal Access Act 2009 and have also consulted with representatives from South West Coast Path. We have tried to ensure that where coastal paths or access are likely to be affected by the policy that this impact is identified and the potential need for mitigation recognised. As recognised in the comments, local level detail will be dealt with at strategy or scheme level.</p>
North Devon AONB	<p>In general the North Devon AONB welcomes the revised North Devon and Somerset Management Plan and supports the approach in open coastal areas of “no active intervention” continuing to let the coastline evolve naturally. It is our belief that such an approach will benefit the management of the habitats and landscapes of the North Devon AONB and the UNESCO Biosphere Reserve.</p> <p>The AONB Partnership in general also supports the opportunities for habitat creation and the more sensitive and responsive approach that the “managed realignment policy” presents. This policy not only provides a new low cost approach to coastal defence planning by utilising beaches, sand dunes and salt marsh, but also has a marked benefit in re-creating scarce habitats which have been lost over the past few centuries.</p> <p>Whilst allowing the natural coastal processes to continue may present opportunity for habitat creation, there is no doubt that a policy of non-intervention will result in the loss of many heritage features along the coast. Whilst the Plan acknowledges Scheduled features, the AONB would wish to see consideration within the plan of non-designated, but nonetheless important historic sites both in the text and on the enclosed policy maps. In addition, the Plan needs to state the importance of recording the historic environment before it becomes lost.</p> <p>Finally, we believe that it is important to clearly state that policy development and further refinement to the plan will be based on good science and full consultation.</p>	<p>Only a few key layers are shown on policy unit maps to avoid them becoming overly cluttered and unreadable; non-designated sites are therefore not shown on policy unit maps.</p> <p>Appendix A addresses how the plan has been developed, whilst Appendix B explains the consultation process and also records how comments (such as those included in this document) have been actioned.</p> <p>In areas where there is a change to existing policy, then non-designated features need to be recorded. This is not relevant unless there is a change in management policy.</p> <p>A generic statement has been within the SEA that impact to non-designated sites will be dealt with a scheme level.</p>
Local Resident	<p>Although the EA should be applauded for providing public exhibitions, I have to say staff there appeared to lack local and technical knowledge and interaction with possible new major developments (i.e. Hinkley 'C').</p>	<p>Where possible technical staff were invited to events, however, their attendance could not be guaranteed. Non-technical staff were present to aid the smooth running of events, rather than to provide advice on a technical level.</p>
Local Resident	<p>It is a pity that the exhibition was not A) properly publicised and B) only available in Barnstaple.</p>	<p>Stakeholder events throughout the SMP review process have been held at times and locations following guidance from Defra and advice from the SMP Client Steering Group. Events were held at geographically</p>

		<p>diverse locations. For example, the public consultation events were held at Barnstaple, Minehead and Burnham-on-Sea.</p> <p>Events were publicised through letters to stakeholders, press releases, the North Devon and Somerset Coastal Advisory Group website and posters sent to relevant Parish Councils and libraries.</p>
<p>English Heritage – South West Region</p>	<p>Terminology. We would like to see the use of the term Historic Environment used throughout the document and Appendices. Various terms are used (Historic Environment, Cultural Heritage, Architectural and Archaeological heritage etc) which is inconsistent and confusing to the reader. For the purposes of the SEA the use of the term 'Historic Environment (Cultural Heritage)' would be acceptable.</p>	<p>Comment noted - All documents have been amended using suggested terminology.</p>
<p>NFU</p>	<p>Overall comment on the Shoreline Management Plan Process The NFU and its members recognise the importance of Shoreline Management Planning and that taking a long term view is essential given the timeframes within which coastal processes occur and the potential impact of Climate Change. We also feel that a long-term plan will help to ensure coordination between different plans including Catchment Flood Management Plans. Our main concerns are:</p> <ol style="list-style-type: none"> 1. Climate change and food supply are global phenomena. Food production must at least double by 2050 while climate change will curtail production in many parts of the world. The South coast must prepare for increased reliance on locally sourced food and energy. 2. Landowners that are to be affected by any changes in management or potential loss of land due to policy decisions MUST be consulted and listened to. Landowners have an understanding of the recent history of the land and also close links with the community. Therefore they can help to frame solutions for all. 3. Where land is lost then landowners must be compensated appropriately. <p>In addition to our main concerns there are a number of key issues for farming and land management:</p> <ul style="list-style-type: none"> • The SMP must be sufficiently flexible to allow individual land managers to manage their land and assets irrespective of broad-brush policies. • There must be a streamlined and efficient authorisation process to enable land managers to maintain their own seawalls when necessary. • There must be a mechanism to facilitate long term co-operation among land managers to find local solutions to local issues • Managed retreat and habitat creation projects should only be approved when they are justified in terms of flood risk management as well as environmental enhancement. • The full impact of sediment deprivation resulting from long term dredging must be evaluated. • Whenever possible coastal land should be managed by riparian owners, not institutions. • The tax regime should be revised to aid the use of 'inert waste materials' in seawall construction and maintenance • The UK interpretation of the EU Habitats Directive should be reviewed so that practical solutions can be delivered (where imposition of the regulations might thwart progress) • Longer-term payments for habitat creation under Higher Level Environmental Stewardship (HLS) should be available in cases of permanent land use change. • The cultural and historical importance of man's (farmers) management of the coast over many centuries should be recognised • There should be a challenge mechanism in place to allow individuals, local authorities or organisations authorities to appeal against nationally driven EA decisions in exceptional cases where local circumstances dictate that another approach would achieve more effective FCERM (following consultation with and approval by the EA). This would prevent a nationally driven policy creating too rigid a framework for the locality to work within. <p>Comments on the Content of the North Devon and Somerset Shoreline Management Plan The plan is well structured and takes a rational approach to the examination of the issues. Given the complexity of the task and the depth of technical information that is required the plan is excellent for providing an overview and the strategic level of detail as to the policy objectives to be taken.</p> <p>It is crucial that in the next stage that each individual policy unit is explained directly to those that are to be effected. Our members are not all able to access the internet and will therefore need to be given paper copies of the preferred policies to implement the plan especially where they will be directly affected. We have always found that where farmers and landowners are shown the evidence backed up by robust science and linked to appropriate mechanisms for delivery then there is likely to be support for any proposals.</p>	<p>Overall comment on the Shoreline Management Plan Process Although we acknowledge many of the points made, development of this SMP has been undertaken using the guidance produced by Defra and with consideration of existing Treasury Rules.</p> <p>Issues of compensation and food security are beyond the scope of this SMP to address alone but should rather be directed to the Environment Agency and Defra for consideration in future coastal management guidance. It should also be noted that, in recognition of future social and economic change, the SMP will be subject to a 5 to 10 year review process.</p> <p>Comments on the Content of the North Devon and Somerset Shoreline Management Plan We have noted your concerns regarding accessibility to documents and will aim to address these.</p> <p>Agriculture has been considered in the appraisal of policy options and this is dealt with in Appendices E and F in particular, as well as in the implications tables. We note the concerns raised and will review the implications tables and text in the main SMP to ensure that farm business and their important role are properly represented within the tables and main document.</p> <p>Agricultural land values have also been included in the economic appraisal using the May 2008 guidance from Defra. Therefore its economic value in this area is recognised in full, given existing rules and information. Following your comments, we will, however, look to add some text to the main Plan document similar to that presented in the Severn Estuary SMP.</p> <p>As stated above, the SMP has to consider existing Treasury Rules, which means that defence funding will be concentrated in areas where there is greatest economic benefit. However, in setting policy has tried to balance the needs of the various interest groups. Whilst it is recognised that hold the line policies tend to be concentrated on areas of higher population, along this coastline there are also significant environmental and landscape concerns which promote no active intervention and managed realignment policies, therefore justification of policies is not purely based on economics.</p> <p>It is not within the remit of the SMP to comment on compensation issues. However, the Government, in its response to the 1998 Agriculture Select Committee report into flood and coastal defence, stated the current approach to compensation:</p> <p>'Except in limited circumstances, no compensation is payable to those affected by flooding or erosion, including cases where it is decided not to defend a particular area, or to undertake managed realignment. This approach, adopted by successive Governments, is justified by current legislation, which provides operating authorities with permissive powers to undertake flood and coastal defence works. Save for the specific requirements of the Habitats Directive, there is no general obligation to build or maintain defences either at all, or to a particular standard. Consonant with this approach, the legislation also makes no provision for compensation from public funds to persons whose property or land is affected by erosion or flooding'</p> <p>Where managed realignment is proposed, there may, however, be opportunity for financial compensation for landowners and this is discussed in a separate note prepared by Defra and available from the Defra website: http://www.defra.gov.uk/environment/flooding/policy/guidance/realign.htm#3.4%20Financial.</p> <p>We note the comment of increasing future food demands and decreasing agricultural land and will inc into SEA. However, there is currently no guidance on how this should be addressed in the SMP.</p> <p>We note the comment regarding potential impacts of Managed Realignment schemes on land drainage and salt-water intrusion and would recommend that these issues should be fully investigated prior to any MR scheme being implemented. The need for such studies will be addressed in the Action Plan.</p>

We are concerned at the lack of reference to agriculture in the document. The only times we could find agriculture mentioned were in the SEA Objectives on Page 18 and in a short paragraph on Page 38. Given the importance of the food security agenda, as presented by Hilary Benn with the launch of the UK Food Strategy in August 2009, we believe agricultural should be given a higher profile. We accept that land use is a balance of competing demands which includes flood storage, development, biodiversity and food and believe that the only way to have an informed choice is through ensuring each demand (or public benefit) is adequately evidenced and analysed. This is not the case with the SMP as it currently stands. A good example of text used for agriculture is in the Draft Severn Estuary SMP. This is given in the box below:

Agricultural Land

A large part of the SMP2 area is used for agriculture. The Agricultural Land Classification (ALC) system grades agricultural land based on its quality and the range of different types of agriculture it can be used for. The grade is based on a number of factors including soil depth, risk of flooding and drought risk. Grade 1 land is the most valuable because it is high quality and can be used to grow a wide range of crops. Grade 5 land is the least valuable because it is only generally suitable for grazing.

Approximately half the agricultural land in England and Wales is Grade 3 and this is subdivided into Grade 3a and Grade 3b. Most of the agricultural land in the SMP2 is of Grade 3. Grade 3 land is considered 'good to moderate' and is generally used for cereals, oilseed rape, potatoes, sugar beet or for grazing / grass.

English, Welsh and UK policies recognise the importance of agricultural land for producing food and the challenges facing farming, including those from climate change, globalisation and rising fuel prices and competition for land. The issues of food security and how self-sufficient the UK is in food production are becoming more important. The UK is currently 60% self-sufficient in all foods (i.e. producing 60% of all the food consumed in the UK) and could produce more than enough food to make the UK completely self-sufficient (Defra, 2008).

Land use planning guidance in England and Wales (WAG 2002, ODPM 2006) advises that significant development of agricultural land is avoided and that lower grade land (Grades 3b, 4 and 5) should be used in preference to higher grade land (Grades 1, 2 and 3a) if there is a need to develop agricultural land. Currently, there is no national guidance on the relative priority of agricultural land when making decisions about the management of flood and erosion risks.

Defra has published a supplementary guidance note *Valuation of Agricultural Land and Output for Appraisal Purposes May 2008*.

This provides an update on the value of agricultural land for use in assessing flood and coastal defence projects in England only

In the absence of specific guidance, the SMP2 has used existing agricultural land values to assess the importance of agricultural land (see **Section 2**).

Taken from Severn Estuary Shoreline Management Plan Review (SMP2). This report was produced by Atkins Ltd for the Severn Estuary Coastal Group (SECG) for the specific purpose of Severn Estuary Shoreline Management Plan Review.

The SMP process to date seems to ignore the potential impact on land based enterprises, particularly farm businesses. These are businesses like any other, except that their primary production asset is the land itself. This is potentially under threat from policies of 'No Active Intervention' which appears to be the 'preferred option' along a large number of stretches of rural coast. From the policy documents a 'Hold the Line' policy appears only worthy of further appraisal along stretches of coast characterised by more urban land uses. Whilst no-one would argue that urban residents and businesses should not be properly defended from coastal flooding, it should not be at the same time acceptable for rural residents and businesses to not be defended from the same flood risk – particularly those businesses such as farms whose essential production asset is the land itself. If future coastal flooding is to be diverted to farmland to protect other areas then a system needs to be put in place to adequately compensate the farm businesses affected for the losses in productive capacity incurred.

There is also the issue of loss of irreplaceable productive agricultural land, which does not appear to be recognised in the SMP objectives or proposals. Land, particularly that used to grow food (and increasingly fuels

We need to read and reference in SEA and add into Issues and Objectives as conflict and detail as potential impact in SEA – re: food supply in South west.

The SMP looked at the grade of agricultural land that would be affected over the three epochs. Range of land was included in the dataset and was therefore covered.

	<p>too), is a national asset and need to be conserved particularly as the UK will play a growing role in producing food for the rising world population over the 100 year timeframe of the SMP.</p> <p>The predicted implications of the plan do cover agriculture but in a way that seems to make light of the implications. The loss of potentially 14,800 ha is serious for a number of very evident reasons. Firstly, the impact on the landowners businesses but perhaps more importantly the impact on food security. Whilst we can understand that where land values for food are compared with those of settlements or where the protection of settlements is compared with those of agricultural land then agriculture will likely be a low priority we believe this is at best misguided. Using rough estimates it is possible to extrapolate that one hectare of land in the UK could feed approximately 4 people (based on FAO 2003 figures). This is based on the assumption that the UK is populous and has a mixed diet including meat. This would then imply that the loss of 14,800ha represents the loss of food for 59,200 people or approximately the population of both Minehead and Barnstaple. The quote below gives a reference to the figures.</p> <p><i>“The minimum amount of agricultural land necessary for sustainable food security, with a diversified diet similar to those of North America and Western Europe (hence including meat), is 0.5 of a hectare per person. This does not allow for any land degradation such as soil erosion, and it assumes adequate water supplies. Very few populous countries have more than an average of 0.25 of a hectare. It is realistic to suppose that the absolute minimum of arable land to support one person is a mere 0.07 of a hectare—and this assumes a largely vegetarian diet, no land degradation or water shortages, virtually no post-harvest waste, and farmers who know precisely when and how to plant, fertilize, irrigate, etc. [FAO, 1993]”</i></p> <p>Where agricultural land is to be lost then this must be done in consultation with the landowner and adequate compensation is made to ensure that they are able to get the full value of the asset and to acquire more land if this is deemed appropriate.</p> <p>In the context of the above, we propose that the following objective is added:</p> <ul style="list-style-type: none"> To maintain the productive and environmental capacity of farmland and the wider countryside <p>Economic viability is essential for land-based businesses, especially farming businesses, to play their positive role in managing the countryside. Unnecessary and unplanned flooding of agricultural land – and roads and other property - benefits neither business nor environment, and if land is prematurely flooded at times when further heavy rainfall is expected it may not be able to absorb excess water just when its capacity to do so may be most needed.</p> <p>Unseasonable flooding aggravated by lack of maintenance also prevents adequate grazing in valley bottoms and the consequent loss of biodiversity. A planned approach to using agricultural land as a “wash land”, for managed flooding, in agreement with the land owners and managers concerned, to protect built up settlements, is a far more effective way to utilise the capacity of land to absorb excess water. Land managers need to be properly recompensed for economic losses sustained as a result of providing this wider public benefit.</p> <p>Rural communities, as well as towns and cities, have social needs and entitlements, and it should not be assumed that the loss of quality or value of their property – which may include significant investments in agricultural buildings and equipment - arising from reduced flood defences, is an acceptable price for them or the economy of these areas to be required to pay.</p> <p>If, as now seems inevitable, managed realignment occurs along the coastline, we are adamant that affected landowners should receive adequate financial recompense for the loss of their assets and livelihoods.</p> <p>While understanding that the strategy at this stage is not taking into account finer levels of detail, we remain deeply concerned about the possible effects of the proposals on the drainage of the areas inland of the new defence banks and of salt-water intrusion into fresh water abstractions. The initial drainage study has done little to alleviate these concerns and we believe that the final costs of the project could have a substantial impact on the validity of the earlier benefit/cost decision.</p>	<p>We have added further detail to supporting appendices to make it clearer why certain policies have been appraised in each area but others have not.</p> <p>As per proposed response above.</p>
Sedgemoor District Council	<p>Given that the draft SMP2 proposals refer to the potential removal of, and or, relocation of properties in the dunes at Brean, we consider that the SMP2, and the subsequent detailed study, should include an explanation of what the acquisition and compensation process and liabilities are in the circumstances where property removal, and or relocation, is necessary as part of a coastal defence project, as distinct from circumstances where property is lost to erosion. In this respect it should be noted that this council would probably be unwilling to</p>	<p>It is not the role of the SMP to discuss compensation measures. This would be something that would need to be investigated and discussed at a more detailed level of study.</p> <p>As discussed in Defra’s Guidance note (see http://www.defra.gov.uk/environment/flooding/policy/guidance/realign.htm#3.4%20Financial), there is no obligation, except in limited circumstances discussed in the note, for compensation to be payable to those</p>

	<p>adopt an SMP which holds the prospect of the local authority being responsible for meeting costs associated with the removal or relocation of property.</p>	<p>affected by flooding or erosion, including cases where it is decided not to defend a particular area, or to undertake managed realignment. The policy statement sets out the assumptions used in developing the policy. It also highlights the uncertainty that remains. Based on the assessments that have been made, it is thought that to achieve this policy using the approach assumptions stated may well require removal of property from the dunes as part of any implementation. However there is uncertainty as to when and where this may be required, hence it is recommended in the text to be considered as part of further detailed studies. The text has been revised to make this clearer and also to add mention that any detailed study needs to look at measures that may be needed to facilitate any possible future requirement to relocate property.</p> <p>The SMP Action Plan will prioritise what work is needed to manage coastal processes into the future, and where it will happen and this will also advise where further research on how we can best adapt to change is needed.</p>
<p>North Devon Council</p>	<p>The SMP2 does not go into much detail regarding policy for existing private sea defences.</p> <p>For example, Policy Unit 7c30 Croyde Bay North. The general Policy is for No Active Intervention. There are lengths of private sea defences in front of the existing properties, continued protection of these locations is unlikely to be detrimental to the long term plan for this coastline. If these defences are retained or even uprated as part of new development would this be against the general policy? Do we need to state that in areas of existing defences, development will be decided locally, as situations will vary around the coast? It may be more economical for a developer to improve a defence rather than let it fall into repair, possibly putting other properties at risk. It may be more useful to provide a form of Managed Realignment rather than No Active Intervention.</p> <p>Erosion/Flood Risk should be re-assessed by a developer in all locations as part of any proposed development. The data is only indicative and local conditions will vary.</p>	<p>The policy statements do refer to private defences and provides advice on whether or not they should be allowed to be retained (subject to private funds being available) and the likely impact of defences remaining in terms of coastal processes. Any additional works would remain subject to the landowner applying for permission from the local planning authority to undertake works at their own cost. They would have to demonstrate that such work would not have an adverse affect on adjacent lengths of estuary or coast.</p> <p>We have reviewed text in the main document and sought to clarify this further in text at the start of Section 5.</p>
<p>Resident Burnham-on-Sea</p>	<p>Key points from this submission are as follows:</p> <p>(1) It is lamentable that assumptions are being made, and these are largely unsubstantiated. This reflects the lack of investigations, the bias within the few investigations that have taken place, and the ad hoc nature of the strategies. The main problem is the SMP is a step towards setting in concrete a flawed policy.</p> <p>(2) At the public meet, Burnham on Sea - many people - mostly EA. Do EA staff get 'points' for attending meets? Certainly, the Burnham meet did not a good public attendance. The statement that public meets were well attended is stretching the facts.</p> <p>(3) As an example of unsubstantiated statements, in the Highbirdge and Burnham Times 31 December 2009, page 6. Article headed "Agency dismisses underwater claim". An EA spokesperson is reported to have said "Nothing is set in stone but to say Burnham will be underwater in 100 years is slightly alarmist." A Sedgemoor Council spokesperson is reported to have said "I can confidently say Burnham will not be underwater within the next 100 years".</p> <p>(4) This section is to emphasis that data and information is useful. Presently the authorities have a drive to obtain selected data without regard to what other data is available, and whether or not the selected data obtained is informative. For example, LIDAR can give an impression of topography, but provides no information on the state of the surface being measured.</p> <p>(5) Mention made, at Burnham on Sea, of tidal gauges to be installed along the Parrett. This is partial to any requirement. What would be useful are water current velocities - a velocity profiler is perhaps an instrument to use. Water current velocities could provide much more useful information. The chances are, because the Parrett is tidal, the water column could be stratified, or is it well mixed? Stratification could have bearing on sedimentation - geomorphology - morphodynamics and water elevation/tidal elevations.</p> <p>(6) The question of tidal water level data. I have limited tidal water level data for Wall Common. With funding - data for waves and water currents could be obtained. Obtaining funding continues to be extremely difficult, making science difficult.</p> <p>(7) NEED FOR WELL DEFINED OUTCOMES. Well defined outcomes, objectives, and how to attain these are not clearly identified nor well defined.</p>	<p>(1) The SMP process is based upon review of available information at the time and necessarily makes some assumptions based on this information. It also however, recognises uncertainties within the information and the Action Plan will advise where further monitoring and investigation needs to take place.</p> <p>(2) We are not aware of the statement being referred to. However, based on experience of holding similar events in other parts of the country, the number of stakeholders attending each event was good. No further action.</p> <p>(3) We are not sure on where these comments have come, and they do not appear to relate to any text within the SMP document - therefore it is not appropriate to comment on them here. No further action.</p> <p>(4), (6), (10), (11), (12) It is agreed that good data is vital and that it needs to be specific to the needs of a particular stretch of coast. The comment regarding the limitation of numerical models is noted and it is agreed that any model needs to be backed up by good data and scientific understanding. As stated above, the SMP Action Plan will advise if/where further monitoring and investigation is required and the appropriate source of funding. It cannot, however, guarantee funding. These comments will be considered when developing the Action Plan.</p> <p>(5) There is currently no mention of tide gauges in the SMP document, but the comments are noted. No further action.</p> <p>(7) We disagree with this comment, but acknowledge that these objectives were not set out in the main document, but are included within the Appendices, as per the Guidance. The key issues and objectives were identified at the start of the process and consulted on with stakeholders during the development of policies. The policy statements set out if/how these objectives will be met and potential implications if they can not be met.</p> <p>(8) The SMP is unable to address changes in public perception, although the aim of the SMP is to form part of the education process to increase awareness of risk and the increasing need for resilience and adaptation measures. No further action</p> <p>(9) The SMP feeds into the planning process and the latest planning guidance will assist planners in making decisions regarding building (and rebuilding) within risk zones. No further action.</p>

	<p>(8) TOOLS TO ACHIEVE OUTCOMES. What tools are available to alter the human perception? If building is to be allowed, are the buildings able to be easily relocated?</p> <p>(9) Insurance industry, a limited number of claims can be made when damaged by flood/erosion events. Similar to east coast USA, buildings can either remain, or relocated, or demolished depending on the extent of the structural damage. Or, will people be allowed to completely rebuild brick houses at ground level in the same location after event damage?</p> <p>(10) TOOLS TO ACHIEVE A RATIONAL PERSPECTIVE It is apparent the EA do not have a long term perspective, more correctly has little to no real data to establish rules to attain a desired outcome. The recent need to obtain data is reflected in the plethora of consultant reports. It can be demonstrated that these reports contain errors of observation - people do not know what it is they are looking at. There is also an element of regulation, dominating practicality. It could also be desirable that real data gathering be supported, rather than blocked, in favour of supporting derived perceptions.</p> <p>(12) Perhaps reflecting the quality of the reports. Universities have decreased the field work requirement to qualify. The lack of suitably field trained personal, and the lack of field experience is increasing. Is this a reason to justify the use of numerical, and other models to find a solution. Numerical models are a useful tool, for example to site instrumentation for field work set up. To suggest that numerical models are a definitive tool for prediction is perhaps not a smart choice. For example, the Sedgemoor Council flood maps.</p>	
<p>Planning and Advocacy Co-ordinator</p>	<p>The Trust supports an environmentally sustainable approach to managing Somerset's shoreline into the future in the face of predicted climatic change and sea level rise. We feel that a programme of managed retreat and no active intervention along uninhabited coastline, as generally detailed in this SMP, provides the most sustainable option. Such an approach could, over time, help to restore natural shoreline processes in areas that have until now been defended, improving the ecological value of such areas.</p> <p>Holding the line in inhabited areas is likely to lead to coastal squeeze and have impact upon the important intertidal features of the Severn Estuary SPA, SAC and Ramsar. Managed realignment, such as that at Steart, offers an opportunity to mitigate these losses through habitat creation, and the Trust strongly supports efforts to achieve the managed realignment policy option along the Somerset coastline wherever practical. It is important that any losses to biodiversity arising from coastal squeeze are mitigated for, and therefore the Trust would advocate and support a programme of monitoring to establish any positive or negative effects to biodiversity arising through implementation of the SMP.</p> <p>The impacts of any new tidal energy scheme within the Severn Estuary will need to be considered in future reviews of the management plan, as any dam infrastructure constructed in the estuary will certainly have an effect on the Somerset shoreline through the disruption of in-channel processes.</p>	<p>The SMP Action Plan (that has now been produced) advises where further monitoring and investigation needs to take place. These comments were considered when developing the Action Plan.</p> <p>It is agreed that any tidal energy scheme would need to be considered in future reviews of the SMP, but it was not considered appropriate for the SMP to pre-guess outcome of the ongoing feasibility studies.</p>
<p>Devon County Council</p>	<p>1. Summary (1.1) The County Council welcomes the revised North Devon and Somerset Shoreline Management Plan (SMP) and looks forward to working with the Environment Agency and District Councils and other partners to deliver a sustainable approach to coastal defence, given the increasing challenges from climate change. Given the SMP's four generic policy options, the County Council supports the general approach in open coast areas of 'no active intervention' and the continued policy of defending coastal settlements under the 'hold the line' policy. It also supports the opportunities for habitat creation and a more natural, responsive and cost effective approach that the 'managed realignment' policy enables.</p> <p>(1.2) However, there are areas of concern in relation to the long-term management of the former landfill site at Northam Burrows and in relation to some 'managed realignment' policies, particularly in the vicinity of cycleways and the South West Coast Path. In relation to the cycleway the County Council objects to the proposed course of action as expressed currently.</p> <p>2. General Comments Set out below are a number of general comments in relation to the overall strategic and policy approach set out within the SMP. These are supplemented by the attached table in Section 3 [NB: these 'Table 3 comments are presented in the relevant sections of this Feedback Report'] below setting out specific points on the key areas of concern for the County Council.</p> <p>(2.1) The Council supports the continued investment in coastal defences to prevent flooding and erosion of the coastline at our coastal towns and resorts. The safety of residents and the functioning and prosperity of</p>	<p>(1.2) see response to (2.5).</p> <p>(2.1) Comment noted – there is a recommended 5 to 10 year review period for SMPs. No Action Required.</p> <p>(2.2) Non-designated archaeological sites and landscapes have been considered in the development of policy and are referred to in the supporting information (Appendices D, E and F especially). We will review how these are referred to in main document and consider need to update policy statements and/or implications tables. We will also ensure that the need to consider mitigation measures, such as photographic mapping, is duly noted.</p> <p>(2.3) Where MR has been proposed the SMP has highlighted the need for further more detailed studies to be undertaken and this will be further emphasised in the action plan to be developed as part of the final SMP.</p> <p>(2.4) The SMP recognises that in certain location further studies will be necessary and these are discussed in the Action Plan.</p> <p>(2.5) The policies in units 7c16 to 7c26 promote that investigation of realignment opportunities should be investigated in detail but that if not found to be appropriate then defences would be held. The retention of footpaths would be considered in these detailed studies, but for the purpose of the SMP it is not an overriding factor in policy selection, which is in line with the Position Statement for the South West Coast Path.</p>

	<p>seaside businesses are vital. It is recognised that there is a need to prioritise spending and deploy cost effective schemes, so the need to undertake more detailed investigation before investment is made is very important. There will be a need in the future, under these temporally far reaching plans, to continue to review priorities and to relate pressures from climate change, coastal defence activity and spending to broader strategic planning across the region.</p> <p>(2.2) The Council, in its support for environmentally protected coastlines, acknowledges the appropriateness of a policy of ‘no active intervention’ in those areas where there is an open and undeveloped coast. Such an approach will benefit the management of the UNESCO Biosphere Reserve in northern Devon and the North Devon Area of Outstanding Natural Beauty (AONB). It will more generally favour the evolution of a natural, beautiful and dynamic coastline, one which the County is renowned for. The Council considers that there should be mention in the report of the issue of the quantity of significant, but non-designated, historic environment interests within the SMP area. As it stands, the report does not refer to non-designated, but important, historic and archaeological sites and landscapes.</p> <p>(2.3) The Council views the intermediate policy of ‘managed realignment’ as providing opportunity to bring a new approach to coastal defence planning. It enables a less interventionist and, therefore, less costly approach to managing the coastline. Its reliance on the inherent energy absorbing nature of beaches, sand dunes and salt marsh provides a useful tool to manage the coastline. It also has the marked benefit of permitting re-creation of scarce habitats, which have been lost in significant amounts over the last two centuries. However, by its very nature, it involves the repositioning of a line of defence so occasionally comes into conflict with developments on land. The County Council is mindful of the need to make proper provision to protect life and property, where this is feasible, cost effective and environmental damage can be mitigated. Of particular concern are any real risks to life and property and highway, access and transportation infrastructure.</p> <p>(2.4) The SMP is accepted as a strategic policy document under which detailed studies and strategies may be developed. However, the level of information that the SMP contains suggests strongly that further studies and strategies will be essential to resolve certain issues. The County Council recommends that more discussion and analysis is included to explain the policies in the Plan where information exists.</p> <p>(2.5) It is on the basis of potential impacts of certain of the proposed policies that the County Council has chosen to object to certain proposals. These include the policy units 7c16 Instow - Yelland to 7c26 Crow Point and Crow Neck inclusive through which runs the Tarka Trail, a nationally significant recreational route, which coincides here with the South West Coast Path and the National Cycle Network. In addition the County Council believes that a more flexible approach in the long-term at Northam Burrows is appropriate.</p>	
<p>Wessex Water</p>	<p>Wessex Water operates as a regional water and sewerage undertaker, however it should be noted that some areas of North Devon and Somerset may overlap with South West Water and Bristol Water. We have been able to complete a review of the plan and the potential impact upon our assets within the coastal zone. A preliminary risk assessment has been carried out to establish if any of these assets might be highlighted as being vulnerable to rising sea levels or coastal erosion over the time periods outlined in the SMP. <i>[NB: details of this risk assessment have been provided to the SMP].</i></p> <p>A total of 86 Wessex Water assets were identified in the SMP area, and 22 were identified as being at some risk from coastal flooding or erosion over the next 100 years. We understand the methodology behind the policy decisions set out in the draft SMP, and we can generally accept these proposals for most areas. However there are some concerns regarding a number of critical assets. These are 3 sewage treatment works that we have identified to be at risk within the North Devon and Somerset area. In particular there is one site at West Huntspill that will be affected by the managed realignment of the shoreline. Details of these sites are:</p> <p>Asset: West Huntspill STW Location: West Huntspill, Highbridge (WW Site ID 13336) Grid Ref: 330038, 146749 Policy Unit: 7d42 Provisional SMP Policy: ST = HTL, MT = MR, LT = MR.</p> <p>Asset: Sparkhayes Lane STW Location: Sparkhayes Lane, Porlock (WW Site ID 13515) Grid Ref: 288552, 147400 Policy Unit: 7d17 Provisional SMP Policy: ST = NAI, MT = NAI, LT = NAI.</p>	<p>We thank Wessex Water for undertaking the analysis and have reviewed the main plan to ensure the three critical assets at potential risk are highlighted sufficiently.</p> <p>A meeting was also held with Wessex Water on 9th March 2010 to discuss further as requested at which policies were clarified and implications discussed.</p>

	<p>Asset: Weston-super-Mare STW Location: Accommodation Road, Beadon (WW Site ID 19155) Grid Ref: 331010, 156710 Policy Unit: 7d45 Provisional SMP Policy: ST = HTL, MT = MR, LT = MR.</p> <p>In the circumstances we would welcome further discussions on the West Huntspill STW and the relevant section of shoreline to understand the full implications of the policy and what future actions we may need to undertake. If managed realignment cannot accommodate this asset we will need to consider options to relocate or abandon the works. The option to relocate may require provisions to reserve or safeguard alternative sites and require investment of around £30-40 million. It appears that no immediate actions are necessary in the short term for existing outfalls, and these can be adapted with the retreating shoreline where appropriate.</p> <p>I would request that we arrange a future meeting to review the above information and agree any necessary measures that should be contained in the SMP.</p>	
The Crown Estate	<p>Whilst we do not have specific comments we have prepared the enclosed briefing note which we would be grateful if you would take into account when collating information and making decisions on policy and forward to anyone that might be connected with the decision making process.</p> <p><i>[NB: briefing note sets out the role and responsibilities of The Crown Estate]</i></p>	Briefing note was circulated to all NDASCAG members and reviewed in respect to the SMP.
Natural England	<p>Natural England's purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our aim in addressing coastal change is to influence policies and decisions associated with managing a changing coastline to ensure the sustainable management of the natural environment and maximise benefits to both the environment and society.</p> <p>Natural England is actively involved in the management of coastal change. We are a statutory consultee and adviser in relation to most flood and erosion risk management schemes undertaken by the Environment Agency and local authorities; we are responsible for designation and management of coastal wildlife and landscape assets; we are responsible for developing Government's approach to coastal access; we directly manage several coastal National Nature Reserves, are responsible for agri-environment schemes in the coastal zone and we engage in the development of strategies that determine the long-term management of the coast.</p> <p>Natural England believes that:</p> <ul style="list-style-type: none"> • Management of the English coastline should focus upon the development of a dynamic environment resilient to the action of coastal processes and sea level rise. • There is a need to conserve, manage and sustain sediment supplies that feed coastal systems and the landscapes and habitats they support. • The challenge of coastal change and rising sea levels requires new adaptation mechanisms to deliver sustainable coastal management. • Planning for critical coastal infrastructure and access routes needs to embrace the way the coast will respond to the action of coastal processes and sea level rise. • There is a need to facilitate migration and adaptation of key natural environment assets as the coast evolves, by appropriate use of regulation, advice and incentives. • Local communities should be involved in determining sustainable approaches to the management of the coast. Natural England will participate in this process when the natural environment is a major consideration in decision-making. <p>Natural England will work with national and local government, operating authorities responsible for shoreline management and other key partners involved in coastal issues to develop more sustainable approaches. In particular we will:</p>	Comments here are supportive of the SMP and are noted. No further action required.

	<ul style="list-style-type: none"> • Seek to sustain rich, diverse and functional coastal ecosystems and landscapes. Adapting to coastal change means that, in many cases, it will not be possible to conserve the current mosaic of habitats and species and that landscape character will evolve. We will work to maximise sustainable opportunities for wildlife, geodiversity, the landscape and people as the coast changes and adapts. • Encourage solutions that maintain and enhance the functionality and dynamics of coastal systems. We believe that management solutions at the coast need to work with coastal processes. Natural England welcomes coastal change where this is part of the natural dynamics and functioning of the coastal system. We welcome recommendations for a No Active Intervention policy along most of the North Devon and Somerset coastline, in that this approach will allow coastal processes to shape landscapes and habitats naturally. Changes in sediment supply and accelerated sea level rise will inevitably lead to the loss of presently valued environmental assets in some locations, but maintaining a dynamic environment will create time and space for adaptation to changing circumstances enabling different combinations of habitats and species to take their place. • Encourage coastal managers and planners to take a long term and strategic view of coastal change. Our objective is the creation of coasts and estuaries (through active management where appropriate) that are naturally more resilient and therefore able to adapt to future changes. • Encourage greater recognition of the value of coastal habitats as natural coastal defences, and for the wider use of “soft” engineering techniques as a coastal management tool. We welcome the increase in recommendations (cf. SMP1) for Managed Realignment where this will create new habitat to expand the resource and replacement habitat for sites elsewhere reduced through environmental impacts or lost completely. We will work actively with partner organisations to manage coastal change sustainably to benefit the natural environment and society. <p>We have contributed to the development of the Plan through NDASCAG and SMP2 Steering Group discussions and have already commented on the following key documents released during the development of the Plan:</p> <ul style="list-style-type: none"> • Draft Theme Review (December 2008). • Draft Issues and Objectives Report (January 2009). • Draft Policy Options Summary (July 2009). <p>We agree, in general, that the policies selected for the Policy Units are appropriate given the high-level strategic purpose of the SMP2.</p>	
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<p>Environment Agency</p>	<p>We acknowledge the large amount of work put into this Plan by the consultant, the Steering Group and the Project Management Group. Consultation has provided the opportunity for local issues to be addressed in detail.</p> <p>Consultation will have revealed areas where it is required to work on the policy statements to ensure that the position adopted can be explained succinctly and how the decision was arrived at. Generally we support the proposed policies in this Plan, although we raise queries at some locations, as outlined in section 4.5. We are pleased that the Plan recognises the need for more detailed investigations in some locations, for example, the Taw-Torridge Estuary.</p> <p>It is important that we align policies in this Plan with those of other plans, such as the Parrett Estuary Strategy and Steart Project, ensuring that we show any linkages and compatibility of the objectives.</p> <p>We would like to see a more detailed statement on the Plan after adoption, how it will be taken forward and what the outcomes will be. The Action Plan will be key to this and will need to identify strategies and projects. These need to be clearly identified within the text of the Plan to ensure that they find their way on to the action list and ultimately on to future business plans.</p> <p>Projects/studies for Managed Realignment will need to be identified, along with plans for the maintenance/upgrading of defences.</p> <p>The Regional Coastal Monitoring Programme and the Regional Habitat Creation Programme will both be important to the future success of this Plan.</p> <p>Presentation style The final document needs to be thoroughly proof read and checked for spelling errors, consistency in terminology and plain English. It is quite clear that the draft document has not been thoroughly checked, for example, there is an error on page one in the second paragraph, where a ')' needs to be removed.</p>	<p>Agree and we have worked closely with those developing the Steart Managed Realignment Project to refine policy in this area such that SMP and project are aligned. We have already discussed SMP with the Parrett Estuary Strategy EA project manager and aligned policies with that, although some modification of the long term policy is necessitated by developments of the Steart project not picked up by the strategy.</p> <p>The SMP recognises that in certain location further studies will be necessary and are discussed in the Action Plan.</p> <p>The final document has been reviewed and checked further as part of producing the final document.</p>
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Comments Relating to Mapping

Comments from?	Comments	Action/Response
Environment Agency	<p>The coastal erosion map for the above policy unit at Blue Anchor looks to be wrong and unrepresentative of the actual rate of erosion. The 0-20 year line is shown as seaward of the existing cliff line, no 20-50 yr line is visible and the 50-100 year line is not far enough inland. This line still shows the majority of the Blue Anchor Hotel garden in tact- which we know will not be the case if present rates continue.</p> <p>Could Halcrow look into revising this map please.</p>	<p>This is a mapping error, due to the different map scales used. The erosion mapping has therefore been rechecked and updated.</p>
Resident of Dunster Marsh	<p>Concerned that her property (Old Manor at Dunster Marsh) is not shown as Grade 2* listed by the symbols on the maps in the document - she thinks that this might be important in the context of any managed realignment scheme proposals encroaching towards her house. She wonders whether the listed buildings layer data in the report is therefore accurate.</p>	<p>We recognise that there have been issues with the heritage data presented and therefore we reviewed data previously received and re-obtained and re-plotted data. The implications tables have been reviewed on the basis of re-obtained data received, to address the issue raised.</p>
English Heritage – South West Region	<p>(1) Map symbols. There is a major problem with the depiction of Historic Environment data, which is noted below under Appendix L (point 9).</p> <p>(2) Apart from that, we find the use of the colours and symbols confusing. The red circles purport to show Grade II listed buildings, however, the Grade I and II* buildings (higher graded listed buildings) are not so clearly visible, at least on the smaller scale maps.</p> <p>(3) It would be useful to state here what Flood Risk Zone 2 means, as otherwise the information is only accessible in an Appendix.</p> <p>(4) L2.1 (g) Policy maps. The text states that only Scheduled Monuments and Listed Buildings were shown for clarity. This is not adequate; the maps should also have included Conservation areas, Protected wrecks, and Registered Parks and Gardens.</p> <p>(5) Having said this, there appears to be a major problem with what has been shown on the Policy maps. For example, there are no un-Scheduled Monuments shown on Exmoor, whereas in other areas there appear to be Scheduled Monuments where none exist and in others, they are missing (e.g. Kilve Chantry). The plotting of listed buildings looks incorrect for some areas and some (see point above for 7d19-7d23) are clearly missing. There appear to be some Scheduled Monuments and Listed Buildings shown in the sea (the SM on Minehead beach is the only one that should be in the intertidal zone). Some of this may be due to 4 figure grid references, but probably not all of it. We recommend that the datasets are re-examined and replotted, having been checked with the Historic Environment Record Officers for Devon, Somerset, Exmoor and North Somerset.</p> <p>(6) As it stands, we are not confident that the implications of the preferred policies have been correctly identified, as the maps show problems with the datasets.</p> <p>(7) L2.3 (c) Theme maps. The Theme maps look less muddled than the Policy maps, but they also require careful checking to ensure that the data is correctly portrayed.</p>	<p>(1), (5), (6) and (7). We recognise that there have been issues with the heritage data presented and therefore we reviewed data previously received and re-obtained and re-plotted data. The implications tables/assessments made (Main document and Appendix F/G/I) have been reviewed on the basis of newer-obtained data received, to address the issues raised.</p> <p>(2), (4) The policy maps are intended to provide a summary of key information only. To include every data item on them would make them confusing. This information is already available to review in Appendix D also. We therefore disagree about adding more data to the policy maps.</p> <p>(3) Flood Zone 2 is defined in the start of Section 5. We considered adding text to the maps but space constraints on maps meant this could not be done in a consistent/readable way.</p>
North Devon Council	<p>The Coastal Path/Tarka Trail should be marked on the maps</p>	<p>The policy maps are intended to provide a summary of key information only. To include every data item on them would make them confusing. We do not therefore intend to add this layer to the maps explicitly.</p>
Environment Agency	<p>It is not clear which section of coast some policy unit maps refer to, for example, policy unit 7e02 where several units are shown on one map.</p> <p>The coastal erosion lines on some maps do not correspond with the maps and are unrepresentative of the actual rates of erosion. For example, in unit 7d23, the 0-20 year line is shown as seaward of the existing cliff line, no 20-50 year line is visible and the 50-100 year line is not far enough inland. This line still shows the majority of the Blue Anchor Hotel garden intact, which we know will not be the case if present rates continue. Is this an issues with the scale of map used?</p> <p>The indicative potential managed realignment lines on maps have the potential to mislead and cause undue concern. Although the legend states that the actual lines are subject to more detailed study, in some cases they are being interpreted as definitive realignment projects by the public. Regional consistency should be adopted between the Plans.</p> <p>Although the coasts of the five Plans around the South West are of differing characteristics, we should consider</p>	<p>We considered the possibility of adding policy unit markers to the policy unit maps, however when this was looked at in developing the draft maps it was found to make the maps even more complicated. We have however amended the maps so that only the policy unit boundaries for the unit in question are shown plotted on individual policy unit maps.</p> <p>We have reviewed the erosion lines shown on the maps to make sure they are accurate. The problem appears to be an issue of scaling between the mapping used between development of the NAI maps and the policy unit maps.</p> <p>The use of indicative potential MR lines has been included on policy unit maps in many other SMP2s including the South Devon and Dorset SMP2, by way of visually representing what a policy of MR might mean in spatial terms. Following discussion with the Project Management Group it was decided to keep these lines but rationalise them so only one indicative line is shown and only for the unit being presented on the map.</p>

Comments from?	Comments	Action/Response
	the overall presentation of all our Plans such that an individual who is interested in areas in more than one Plan can smoothly move between the documents.	

Comments Relating to Documentation

Main SMP Report

Comments from?	Comments	Action/Response
Resident of Bideford	On page 30 (in section 4.1.3) it is stated that the geology of Hartland Point is Old Red Sandstone of Devonian age. The Point is formed of sandstones and some shales of the Bude Formation and are of Upper Carboniferous Age. Errors like this offer hostages to fortune to those who would seek to discredit the science behind the SMP.	Thank you for this comment – we will check text in both the main document and Appendix C and amend as appropriate. We have revisited the source stated for this and realise that it was mis-represented. We have corrected this detail using information from Devon County Council's Guide to the Geology of Devon.
West Somerset Railway	<p>Following summarise key points from letter submitted:</p> <p>It is entirely conceivable that over the timescale of the SMP the line will function increasingly as an important transport link. If protection of the line is not maintained future reinstatement or realignment of the track bed following storm or flood damage would be prohibitively expensive.</p> <p>We would urge that the historic significance of the railway and probable increased importance to the local population of the line as a transport link is highlighted in the Plan. This would ensure that due regard is taken when the relevant authorities make use of its recommendations in determining what, when and where future protection works are carried out.</p> <p>In the main SMP document, a statement should be introduced outlining the importance of preserving the railway infrastructure. <i>Page 33 section 4.1.8 para 3</i> – “realignment of the coast... <u>possibly</u> seaward of the West Somerset Railway” – suggest that ‘possibly’ be omitted.</p>	Section 4.1.8 paragraph 3 has been amended to reflect this comment. The SMP does, however, also need to acknowledge where policy decision are fully dependent on the future strategy for the railway infrastructure.
English Heritage – South West Region	<p>(1) Section 2 Table 2.2 SEA objectives, Page 18 - A single objective is given for the Historic Environment (Cultural Heritage). This states the following:</p> <p>“To avoid loss of scheduled and other internationally and nationally important heritage assets and features”. It was discussed and agreed at a Historic Environment workshop that this wording was unsuitable. I did point out, before the draft was sent out for consultation that the revised wording had not been used, and was advised that because of time constraints it should be flagged up during this consultation. There is also inconsistency, as in other sections of the draft (for example Appendices E and I) the wording is better, though not ideal, stating “ To avoid adverse impacts on scheduled and other nationally, regionally and locally important cultural heritage sites”.</p> <p>We recommend that the following text replaces all the wording in the various sections of the document, including the Appendices, where the Objective is written: “To avoid adverse impacts on Designated, Registered and other nationally, regionally and locally important Historic Environment Assets”.</p> <p>Features covered by the Objective should also include the Historic Landscape.</p> <p>We would like to see the inclusion of the following additional objective:</p> <ul style="list-style-type: none"> To take, where practical, opportunities for improving the condition of Historic Environment Assets. <p>(2) Section 3. Basis for Development of the Plan</p> <p>3.1 Historical perspective.</p> <p>The position of the shoreline has a complex history and is not solely one of retreat. Substantial reclamation which started in the Roman period, took place along much of the Severn Estuary Levels including between the Parrett and Anchor Head.</p> <p>3.2.3 Page 28. Suggest replacing ‘areas’ with ‘assets’ to read ‘designated assets’.</p> <p>(3.1) Section 4. The preferred plan</p> <p><i>There is inconsistency in the subsections of 4.1.</i></p> <p>Some quantify (briefly) the number of the different types of Designated or Registered Historic Environment Assets, which is useful and some do not. We recommend that these assets are quantified in each sub-section.</p> <p>(3.2) 4.1.4 Westward Ho! to Saunton Down. We note the proposal to extend the defences at Westward Ho!. There is a nationally important monument (Mesolithic midden, peat and forest beds) on the beach and we</p>	<p>(1) The objectives, including the one cited, were consulted on and agreed with all prior to option appraisal. Indeed, the objective cited was amended from its initial wording as is reflected in Appendix E and I (which was the wording agreed at the time). The corrected wording in Appendix E (and so used in the assessment of options for the SMP) is “To avoid adverse impacts on scheduled and other nationally, regionally and locally important cultural heritage sites.”</p> <p>The wording cited in the comment was mistakenly not corrected with this wording and has been for the final plan.</p> <p>We do not agree that we should amend further this heritage objective or add in a new objective at this time. At this stage in the SMP process it will be difficult to incorporate a new objective.</p> <p>Historic landscape was not referred to in the scoping study.</p> <p>(2) We have reviewed and amended text as advised.</p> <p>(3.1) We note the comment re. inconsistency and have reviewed the text and amend Section 4 as appropriate.</p> <p>(3.2) The comment for 4.1.4 has been noted and the implications tables have been checked and amended as necessary.</p> <p>(3.3) 4.1.7 – the text here refers to adaptation and resilience measures not defence measures. The text has been amended to clarify this. Additional text will also be added to address the need for consideration of mitigation measures, should historic environment assets be at risk from damage or loss.</p> <p>(3.4) 4.1.9 - Text throughout documents has been amended to ‘Daw’s Castle’. The policy boundary unit has been moved westwards to cover more of the B3191 road should it be necessary to intervene here. As a result this, also further encompass the castle in the zone of potential HTL instead of NAI.</p> <p>(3.5) 4.1.10 – the text will be amended to include the fish weirs. The text regarding realignment in the Steart will be reviewed and edited to improve clarity. NB we have not mentioned other historic environment asset in this document</p> <p>(4) Agreed - the 2nd sentence has been deleted. The text has been amended to also mention II* buildings.</p> <p>(5) The text has been amended.</p> <p>(6) The additional bullet point has been added as advised.</p>

Comments from?	Comments	Action/Response
	<p>would wish to ensure that work on the defences does not cause any adverse impact on the survival of this site.</p> <p>(3.3) 4.1.7 The text is somewhat contradictory, stating in one paragraph that retention of defences would impact on a wider coastal area, and in the next that measures should be put in place to manage the risk and reduce the impact on people and infrastructure. Text in other parts of the document suggests that Listed Buildings may be at risk from the proposed policy options for Porlock Weir. If this is the case, this should be clearly stated and the Action plan should reflect the need for further investigation of options and mitigation.</p> <p>(3.4) 4.1.9 Blue Anchor to Hinkley Point. Daw Castle should read Daw's Castle. As well as being a Scheduled Monument, this site is also a Guardianship site, which means that it is owned by the Government. Has consideration been given to a policy option which would allow works to slow up cliff recession, in order to prolong the survival of this important monument for the public?</p> <p>(3.5) 4.1.10 Parrett Estuary. There are also many fish weirs in Bridgwater Bay which date from at least the early Medieval period.</p> <p>This section assumes the reader is familiar with the proposals currently being discussed for realignment in the Steart area. Some rewriting would be useful.</p> <p>(4) 4.2 Predicted implications of the preferred policies.</p> <p>4.2.4 Implications for the Historic Environment. The second sentence is not needed as it largely repeats the first. It would be helpful to give more details about what would be protected through the preferred policies compared with a no active intervention policy, or make the relevant cross reference to the data. Grade II* buildings (higher grade than Grade II) are also at risk.</p> <p>(5) Section 5 Policy statements 5.2.2. Replace 'Heritage features' with 'Historic Environment Assets'</p> <p>(6) Managed Realignment policies (p. 44-45) - Please add an additional bullet point as follows: <ul style="list-style-type: none"> Assess potential impacts on Designated or Registered Historic Environment assets and their settings. </p> <p>(7) Page 46 - Mariscon Castle should read Marisco Castle.</p> <p>(8) Policy unit reference tables: please see point above about terminology and re-name heading to read Historic Environment, rather than Architectural and Archaeological Heritage.</p>	<p>(7) Text has been amended to 'Marisco Castle' in all documents.</p> <p>(8) We have amended the text as suggested (current title is an official SEA receptor heading though)</p> <p>We have reviewed the text and sought, where possible, to refer to specifics in SEA that are to be picked up at scheme level.</p>
North Devon AONB	<p>(1) Page 18 - The CRoW Act 2000 raised the status and importance of AONB's and in landscape terms they are to be seen on a par with National Parks. We therefore would suggest that their importance is highlighted in bold and moved further up the list of environmental assets.</p> <p>(2) Section 85 of the CRoW places a duty on all relevant authorities and any public body to have regard for the purpose of conserving and enhancing the natural beauty of the AONB and this should be acknowledged in the Plan.</p> <p>(3) Page 25- Under Natural Environment: Section 85 of the CRoW Act should be quoted under the paragraph relating to the AONB. There should also be a paragraph on the importance of Exmoor National Park and Section 61 of the Environment Act 1995, which is the National Park equivalent of Section 85.</p> <p>(4) Officially there are four defined Heritage Coasts within the SMP area, they are Lundy; Hartland; North Devon and Exmoor.</p> <p>(5) Page 38 - When looking at the implications for nature conservation sites whilst both habitat loss and creation are considered, only example of habitat gain have been cited. (e.g. Porlock Weir) We would ask that examples of habitat loss should also be mentioned and we would suggest the native coastal woodlands of Bideford Bay or the sand dunes at Woolacombe Down as examples of this.</p> <p>(6) In addition, we would wish to see the SMP recommending the development of strategies to replace and compensate habitat loss where this should occur for example the loss of native coastal woodlands as mentioned above. Some of these woodlands could be lost to coastal erosion and they are one of the important habitats that make up the Special Area of Conservation (SAC) along this coastline.</p>	<p>(1) Agreed Section 85 of the CROW Act 2000 is relevant to AONBs so has been bolded. The order in which objectives appears does not indicate relative importance so disagree about moving it up the list.</p> <p>(2), (3) Text has been amended to reflect advised additions.</p> <p>(4) Text has been amended to mention 4 Heritage Coasts.</p> <p>(5) Consider mentioning as appropriate.</p> <p>(6) Replacement habitat would only have to be provided if intervention occurs, not if no active intervention occurs as it would result from natural processes. We have considered a mitigation measure referring to mitigatory habitat in the context of non-designated sites.</p> <p>(7) Consider including an example as suggested.</p> <p>(8) It is not within the remit of the SMP to consider where redevelopment may occur as a result of loss of properties. No action to be taken.</p>

Comments from?	Comments	Action/Response
	<p>(7) Page 39 - Paragraph 4.2.3 states “However, it is recognised that the loss of some coastal properties, to which the AONB designation refers, may affect the quality of the landscape should they be of a special character” It would be useful to cite and example here, we would argue that the loss of coastal properties and existing harbour walls at Buck Mills would be a good example of this.</p> <p>(8) Page 40 - It should be noted that there are implications on the AONB landscape in terms of loss of coastal properties due to non intervention. This may present both opportunity and conflict, especially if there is pressure to re-develop within the AONB to compensate for the loss of coastal properties and infrastructure.</p>	
<p>North Devon’s Biosphere Reserve</p>	<p>Introduction. Page 1 (1) Given the constant demand from the public about more detail the introduction should set out exactly what level the SMP operates and that follow on reports/studies will refine each policy. Perhaps a flow diagram of how the SMP fits with the flood and coastal risk management strategy would be useful. The diagram on page 2 shows the structure of the SMP document itself but not how it fits with the wider world in a very simplistic form. (as shown in the box in 2.2.1.</p> <p>(2) The role of the SMP needs to be updated with reference to the Marine and Coastal Access act.</p> <p>Section 2 SEA (3) Section 2.2.1 as in the introduction above, a simpler explanation on its fit with flood and coastal risk management.</p> <p>(4) Table 2.2 - The SEA objectives frequently use the word “avoid” when avoidance is not going to be possible. I suggest using the term “minimise” as a more realistic object when referring to:</p> <ul style="list-style-type: none"> • Loss of property • Key recreation and amenity • Industrial assets • Farmland • Cultural heritage assets <p>(5) Generally there will be losses of archaeological features which should be acknowledged and it will be up to the various authorities to ensure that there is adequate resources for recording them.</p> <p>Section 3 (6) 3.2.3 - Natural environment: Second paragraph; please add reference to the North Devon’s UNESCO Biosphere Reserve. “Large parts of the North Devon and Somerset Coast are designated as Area of Outstanding Natural Beauty, National Park and or UNESCO Biosphere Reserve.”</p> <p>(7) In this section it is worth noting the obligations under Section 85 of the CROW Act 2000 for due regard to the functions of the AONBs.</p> <p>(8) Page 27, 31; Please refer to the Biosphere Reserve in its proper name “North Devon’s UNESCO Biosphere Reserve”</p> <p>Section 4.3 (9) Managing the change - Given the wealth of environmental assets along the coast line. I would suggest adding the recommendation to produce a Coastal Habitat Management Plan (CHaMP) as good practice. This will help the area to cope with the change of habitats and to strategically replace or re-locate habitats as the coast changes.</p>	<p>(1), (3) we have included text and a figure explaining where the SMP sits in hierarchy of coastal management in UK in introduction (page 1 of main document).</p> <p>(2) Reference has been added to the Marine and Coastal Access Act within the main document text.</p> <p>(4) The objectives were agreed following consultation with stakeholders prior to policy appraisal. Therefore, although we note your point, we do not agree with changing the wording at this stage. No Action.</p> <p>(5) Agreed – the need to consider mitigation measures needs to be addressed in the document and Action Plan.</p> <p>(6), (7), (8) Text to be amended to reflect advised additions/ edits.</p> <p>(9) Comment has been considered when developing the Action Plan.</p> <p>Text amended</p> <p>See comment above re: legislation and AONBs</p> <p>Searched and changed</p> <p>Severn Estuary Strategy is replacing CHaMP</p>
<p>Environment Agency</p>	<p>Section 1 Section 1.1, page 1 – maps are referred to as Figure 1.1 in text but Figure 1 on the maps themselves.</p> <p>Section 1.1, page 1 – SMP document structure flow chart is located on page 2, not page 4. The chart should have a title and figure number.</p> <p>Section 1.1.3, page 7 – ‘Further details of these policies are provided in Section 2.5’, should be Section 2.3.</p> <p>Section 1.3.2, page 11 – the SMP process has involved nearly 400 registered stakeholders.</p>	<p>We have amended these figure numbers. Note, that due to other changes, these are now Figures 1.3.</p> <p>We have added text and added/referred to figure number.</p> <p>We have corrected the text as suggested.</p>

Comments from?	Comments	Action/Response
	<p>Section 2 Page 13 – better quality table needs to be used as the resolution is poor.</p> <p>Table 2.2, page 17 – key recreational facilities are mentioned under social but should also be included under economic. Table not split in appropriate place at bottom of page.</p> <p>A non-technical summary is required as part of the SEA. Has this been produced?</p> <p>Regionally Important Geological Sites (RIGS) have not been fully considered in the SEA environmental baseline and SEA objectives. We accept in most cases that coastal RIGS will be maintained or possibly enhanced by continued natural erosion processes, where the Plan policies are No Active Intervention. Examples of where RIGS may be affected include:</p> <ul style="list-style-type: none"> • 7c04, Clovelly – Hold The Line, with possible work in front of the breakwater, could affect a small part of the RIGS. • 7c08, Appledore Tidal flats – Hold The Line may result in coastal squeeze, affecting the RIGS. • 7d12, Lynmouth – Hold The Line may affect Lynmouth seafront RIGS, depending on the preferred defence option. <p>County Wildlife Sites have also not been fully considered. These ‘Local’ sites are not statutory but they are recognised by Government planning policy and have an important biodiversity network function. The Plan refers to Defra’s higher level targets for flood and coastal defence, which include requirements:</p> <ul style="list-style-type: none"> • to ensure no net loss of BAP habitats. • to seek opportunities for environmental enhancements. <p>Without consideration of County Wildlife Sites the Plan cannot demonstrate that it has met this fully.</p> <p>Section 3 Section 3.1, page 22, line 1 – replace ‘retreating’ with ‘naturally eroding’.</p> <p>Section 3.2, page 28 – consider adding an additional section to cover the proposed development at Hinkley.</p> <p>Section 4 Section 4.1, page 29 – add ‘(50 – 100 years)’ after ‘long term’ in the second paragraph.</p> <p>Section 4.1.4, page 31 – the beach at Westward Ho!, in front of the defence and ridge, is being lost. There is a lack of room for large defences if the beach is not recharged. Wave action along the coastline needs to be considered.</p> <p>Section 4.1.5, page 32 – extra flood storage is unlikely to provide benefits to others, unless it is undertaken on a large percentage of the estuary.</p> <p>Section 4.2.1 – a section talking about starting to relocate now (not just in the long term), following PPS25 advice, should be included. Opportunity may present themselves now or as part of the Local Development Framework process. In the long term towns will have to start moving if sea levels rise as predicted, as it will be unsustainable to maintain their location.</p> <p>Section 4.3.1 – it would be useful to list key points in this section, to make them more clear.</p> <p>Section 5 Section 5.2, Location reference – change ‘east to west’ to ‘west to east’.</p> <p>Section 5.2 – it needs to be stated that Environment Agency flood maps do not include climate change, raised defences, etc.</p> <p>Section 5.2.2, Land use within defended areas – the first approach is to develop in low risk areas. If this is not possible then mitigation should be considered (PPS25).</p>	<p>We have reviewed the stakeholder database and corrected the number of stakeholders.</p> <p>We have replaced this table with an improved version.</p> <p>We have reviewed text and table formatting and amended as appropriate.</p> <p>A non-technical summary has been produced as part of the final SMP. It was not produced as part of the consultation draft and it has never been programmed to be produced until Task 6.1 of the SMP process in line with the Defra guidance.</p> <p>The RIGS dataset was re-examined to ensure full coverage.</p> <p>We have acknowledged effects and have amended the text as appropriate.</p> <p>Covered at local level. We have included comments on the need for the consideration of these sites at a scheme level</p> <p>We have reviewed and amended this text as suggested.</p> <p>We have added mention of Hinkley Point Nuclear Power Station to Sections 3.2.3 and 4.1.9 to address this comment.</p> <p>We have amended the text along the lines suggested.</p> <p>We have modified the text to explain more about the overall vision for this area. More detail also added to the policy statement.</p> <p>The text reflects uncertainty about how much managed realignment would be possible, highlighting the need for more detailed study. Whilst this comment is noted, no further action is required.</p> <p>Having reviewed section 4.2.1 we consider if it to be more appropriate to add this discussion in 3.2.3 Human (socio-economic) environment (i) Land use, infrastructure and material assets, alongside discussion of PPG20. Text has been added to 3.2.3 to address this comment.</p> <p>Rather than bulleting, we have highlighted key points in bold so as to not break up the flow of the text.</p> <p>We have amended the text as suggested.</p> <p>We have amended the text along the lines suggested.</p> <p>We have modified the text to mention both PPS25 and PPG20.</p>

Comments from?	Comments	Action/Response
	<p>Section 5.2.2, Private defences – it may be worth stating that development should take place on the owners land only, i.e. not on the seaward side of defences.</p> <p>In some cases, the preferred policies in the tables and on the maps do not match, for example, units 7d44 and 7e02.</p> <p>Bank naming conventions are incorrect and should use left and right, not compass points. For example, change Axe Estuary west bank to Axe Estuary left bank in unit 7e02.</p>	<p>Having reviewed this text it already states that private defences would need to go through the statutory planning process. As such it is not felt that revision of the text is required. No action.</p> <p>We have reviewed the text and maps and made amendments as appropriate to address this comment.</p> <p>We have reviewed the text and amended to seek to address this comment, although we are not certain if changing naming convention will aid clarity for non-technical readers of the SMP.</p>

Appendix A

Comments from?	Comments	Action/Response
Environment Agency	Section A.5.5, page A-8 what is meant by potential flood	Having reviewed the text we have determined that use of 'potential' in this context is not required and so have removed this.
Environment Agency	Section A.5.7, page A-8 there is no mention of PPS25 and SFRA	The text here is fairly generic to encapsulate the need to work with all guidance, statutes, legislation etc. If we were to list some we should list all. We do not feel this needs to be added to this section.

Appendix B

Comments from?	Comments	Action/Response

Appendix C

Comments from?	Comments	Action/Response
Resident Burnham-on-Sea	<p>Page C-37, 38. Local Scale: Hinkley Point to River Parrett.</p> <p>(1) There is a fundamental flaw in the rational.</p> <p>(2) If sea level rises it could be expected that 'erosion' of source material could increase. This erosion could increase the quantity of sediment available within the coastal environment. If the sediment available increases the sediment supply could increase. The statement of insufficient sediment supply, for example to self-seal breaches is unsubstantiated, and contrary to expectation.</p> <p>(3) The statement "The continued maintenance of the gravel ridge would also prevent natural roll back of the ridges and fronting salt marsh, resulting in the steepening and narrowing of the foreshore and coastal squeeze of the salt marsh." The recent evolution of the barrier is one of salt marsh increase, sediment accumulation and sediment storage (gravels and finer sediment textures). If, this is occurring with present sea level rise, storms and human impacts - then it could be expected to continue. Most certainly, this small length of coast is one of the few about the Parrett inlet that clearly demonstrates a sediment accumulation system.</p> <p>(4) IN IT'S OWN RIGHT THE WALL COMMON BARRIER IS MOST UNUSUAL. THE BARRIER IS PROGRADING AND HAS A SERIES OF DISTINCTIVE RECURVE SPIT TERMINALS. MOST GRAVEL BEACHES ARE FIXED BETWEEN HEADLANDS, FOR EXAMPLE, CHESIL. At present this barrier is self maintaining - it is sustainable. Gravel barriers represent the best known natural energy absorbing morphophology.</p> <p>(7) I am informed that Wall Common is artificial, and is therefore sacrificial for wetland 'development'. Wall Common is certainly not artificial, since evidence points clearly to successive gravel barriers in this area over the Holocene. The successive Holocene gravel barriers indicate Wall Common is self-sustaining.</p>	<p>(1), (2) Consideration of this has been made in the development of policies, including sediment linkages from Hinkley Point to the west and the frontage referred to. From the information available, we are not convinced that there would be sufficient sediment supplied from west of Hinkley Point, nor indeed that even if there would it would reach the area referred to due to the headland at Hinkley Point forming a barrier to transport of shoreline sediment.</p> <p>(3) This statement refers to intervening in the system and artificially controlling it. The aim of the plan is to allow this area to evolve much more naturally and, given the rate of future sea level rise currently predicted, we expect this to result in the shoreline eventually rolling back landwards.</p> <p>(4) Although there is evidence of gravel recurve features at the eastern end of this frontage, the barrier to the west, towards Stolford is becoming denuded of shingle, as material moved eastwards is not being replaced from the west. The fact that little new sediment is entering the system is why the barrier as a whole, between Hinkley Point to River Parrett is not considered sustainable. Unless further evidence is forthcoming, no change in text is proposed.</p> <p>(8) The location of a seawall will affect how sustainable a solution it is. No further action required.</p> <p>(9) It is not within the remit of the SMP to investigate the availability or suitability of recharge material. This is an aspect that would be considered at Strategy and scheme stages.</p> <p>(10) Comment noted. No action required.</p> <p>(11) We have sought to obtain all available information and used this to develop our understanding. We have sought and reviewed the additional data advised by this respondent to ensure that we have not made any omissions. Reference to this is included in Appendix C as appropriate.</p>

Comments from?	Comments	Action/Response
	<p>(8) Can "sustainable" be used in conjunction with sea walls? Seawalls ARE NOT SUSTAINABLE. Seawalls invariably require further protection, e.g., groynes, rip-rap, renourishment. Sustainable means a balance by avoiding depletion of natural resources.</p> <p>(9) The Dutch have run out of sand to recharge sandy beaches. The quantities of sand available for recharge along the West to North Somerset coast are not accurately known. Competing recharge schemes may preclude availability, and certainly increase the costs.</p> <p>(10) Seawalls and associated beaches usually have little to no biodiversity, or any indication of 'life'. Indeed, parking and driving vehicles on sandy beaches is not conducive to sustainability, or the enhancement of life.</p> <p>Page C-40. LOCAL SCALE: River Parrett to Brean Down.</p> <p>(11) It is lamentable the study has not taken into consideration available scientific research. There are two studies known that are not referenced. An incomplete literature review, has lead to some possible erroneous conclusions. For example, the sediment supply and transport directions does not take into account the sediment supply across the Parrett inlet.</p> <p>(12) Circulation patterns, gyres, are identified, but do not mention sediments crossing the Parrett from the west. Several bathymetric survey results have not been included as evidential when making conjecture on the migration of the lower Parrett, or net sediment transport paths.</p> <p>(13) BLACK and VEACH (2008) suggest Berrow flats sediment transport is north to south. The direction of transport could be wind driven. With increased NW wind frequency sands could be expected to be found upstream of the 'ramp' at Burnham, and sailing club members have reported sand for the first time within the Yacht club berthing area.</p> <p>(14) Reports contradict each other. BLACK and VEACH is contrary to HALCROW. One says the Burnham on Sea beach is stable, the other it is eroding. Within the last 18 months the Burnham beach has become erosional.</p> <p>(15) Historical maps, namely OS 1800's, show the dunes closer to the wood light house at Burnham. To suggest the Burnham beach is stable is misleading. It is also misleading to suggest that the beach fronting the seawall can be stabilised, and sustainable.</p> <p>(16) TYPO ERROR 4th paragraph up, line 4.</p> <p>C.3 Climate Change and Sea Level Rise Page 63.</p> <p>(17) This section avoids possibilitie. Note the sea level amplification induced by the Severn geology/morphology. With increased coastal erosion, and subsequent sedimentation, changes to bathymetry, greater local amplification is possible.</p>	<p>(12) The SMP has not undertaken any additional analysis of data but has reviewed the conclusions of various studies. We have sought and reviewed and included, as appropriate, additional information provided by the respondent.</p> <p>(13) Wind processes are likely to be a contributing factor to sediment transport along the upper sandy foreshore, when the flats are sufficiently dry. The latest climate change research (UKCP09) has not, however, provided probabilistic projections for future changes in wind speed or direction. No action proposed.</p> <p>(14) The report notes that historical data for Burnham suggests little change in shoreline position, whilst recent data suggests there has been a recent drop in beach levels. Further data would be required to investigate this trend and recommendations has been included in the SMP Action Plan.</p> <p>(15) Historical maps have been rechecked to appraise this comment.</p> <p>(16) Text has been edited as advised.</p> <p>(17) It is unclear exactly what this comment is getting at. However, as part of UKCP09, changes in storm surge levels for return periods of 2, 10, 20 and 50 years (the level predicted to be exceeded on average once during the return period) were examined. The trends found were physically small everywhere around the UK, with projections suggesting that the surge level expected to be exceeded on average once every 2, 10, 20 or 50 years would not increase by more than 9cm by 2100 anywhere around the UK coast (not including mean sea level rise), but the largest trends were found in the Bristol Channel and Severn Estuary. Also sea level rise is also likely to affect tidal propagation up the estuary, although the main effect of this would be felt in the inner not outer estuary covered by this SMP.</p>
Environment Agency	<p>Section C.1.4, Westward Ho! – consider mentioning Potwalloping and at Horsey Island the storm of 1910, which breached the defences in several places, some over 100 feet wide.</p> <p>Section C.3 – a paragraph explaining that for planning purposes, defence design, etc the figures in PPS25 are too be used, or the latest guidance from Defra. Results should not be interpreted from UKCIP.</p> <p>Page C-92 – the Plan states that no beach management would take place in the first epoch, however, material is building up behind the terminal groyne, suggesting eastward longshore transport. There is already a requirement for bi-annual reprofiling of the sands and even a further recharge may be needed in the future.</p> <p>Section C.4.4.2, page C-106 – reference to UKCIP08 should be 09.</p>	<p>We have researched 'Potwalloping' and included mention of this in text, although it is unknown what the impacts of this custom are, and this has also been noted in the text. Text has also been added to Section C.1.4 on the 1910 floods at Braunton and Horsley Island.</p> <p>A paragraph has been added to Section C.3 to address this comment.</p> <p>Review of this comment against the text indicates that the question has been raised with regard to the NAI scenario. For this scenario, it is assumed that management practices cease and therefore the inclusion of bi-annual reprofiling and future recharge would not apply. No changes to the text have been made, and no further action is required.</p> <p>We have revised the text along the lines suggested.</p>

Appendix D

Comments from?	Comments	Action/Response
English Heritage – South West Region	<p>Appendix D.7 Theme Review</p> <p>(1) D.7 Please change the title to Historic Environment (as it is shown on p.14, Table 2.1).</p> <p>(2) The text does not give a useful summary of the Historic Environment of the area covered by the SMP. The lack of use of the information provided by the Rapid Coastal Zone Assessment, which covers the area from Porlock Weir to Anchor Head, is disappointing.</p> <p>(3) D7.1.1 gives the number of Scheduled Monuments but not any other asset types. As this information has been collected it should be possible to include it.</p> <p>(4) The statement on page 18 that “archaeological sites and finds (and listed buildings) have not been identified individually since these are mostly anticipated to have local rather than strategic importance” needs reconsideration. It should be recognised that all Listed Buildings are of national importance.</p> <p>(5) It is important to note that the Historic Landscape is also affected by changes to the coastline.</p> <p>(6) D7.2 Marine. This section should also mention that there are many other known shipwrecks not afforded statutory protection, but which may also be of national importance. The data should have been collected from the National Monuments Record and county Historic Environment Records.</p> <p>(7) The depiction only of Scheduled Monuments in Annex D6 is not adequate as it gives a misleading view of the Historic Environment. All the data should have been collected, so it is possible to present all the Designated and Registered assets for the study area.</p>	<p>(1) Text to be amended as suggested.</p> <p>(2) We have reviewed the rapid coastal zone assessment and updated text.</p> <p>(3) Further details in this section on numbers of other asset types at risk have been included. Although tabulation of Listed Building has been excluded due to the large number.</p> <p>(4) This statement is in reflection of the fact that such features, whilst important, do not drive the selection of policy in their own right.</p> <p>(5) May be but not considered in the SMP</p> <p>(6) The information held for non designated shipwrecks, where provided, will be reviewed and included in the text. The impact of SMP policy does not extend far enough offshore it impact any designated wrecks.</p> <p>(7) We will consider also tabulating other assets in this Annex; however, it is not intended that the SMP will form the primary reference source for this data. There are over 1000 Listed Buildings within 500m of the coast. Although this could be rationalised to area that might be affected by change this is a long list that would bulk out Appendix D unnecessary. In addition, I (NC) have been through the data and it seems the it does not include Grade I structures,</p> <p>We have included a note in Appendix D to this effect.</p>
Environment Agency	<p>Section D.5, page D-13</p> <p>Change 2009 to 2010.</p>	We have revised the text as suggested.

Appendix E

Comments from?	Comments	Action/Response
English Heritage – South West Region	<p>(1) There is useful information in this section which could be made better use of elsewhere in the document. Please note the points made in Section 2 of the main document on SEA objectives.</p> <p>(2) Features covered by the Objective should also include the Historic Landscape.</p>	<p>(1) Refer to previous response in ‘main SMP document section’ about this.</p> <p>(2) Historic landscape has not been included in the SMP.</p>

Appendix F

Comments from?	Comments	Action/Response

Appendix G

Comments from?	Comments	Action/Response

Appendix H

Comments from?	Comments	Action/Response
Environment Agency	Annex H.3, page H-83 Reference made to South Devon and Dorset SMP. MHWS values do not look as expected. Are these correct?	We have reviewed and revised the text to address these comments.

Appendix I

Comments from?	Comments	Action/Response
English Heritage – South West Region	Please note the points made in Section 2 of the main document on SEA objectives.	Refer to English Heritage comments in Section 4.1 and make amendments to text as necessary.

Appendix J

Comments from?	Comments	Action/Response
RSPB	<p>We consider that the Appropriate Assessment (<i>the AA</i>) (Appendix J) is flawed in that it concludes that the SMP will not have an adverse effect on the integrity of the Severn Estuary Special Protection Area, Ramsar site and Special Area of Conservation (<i>the N2K sites</i>) because ‘<i>Habitat loss due to coastal squeeze can be mitigated by the creation of new estuarine/intertidal habitat through the Southern Regional Habitat Creation Programme</i>’ (p.J-5). Under Regulation 48(6) of the Conservation (Natural Habitats, &c.) Regulations 1994 (<i>the Habitats Regulations</i>), in considering whether the plan will have an adverse effect on the integrity of the site, the competent authority should <i>have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions (commonly referred to as mitigation)</i>. The AA recognises that some of the SMP’s <i>hold the line</i> policies would lead to a progressive loss of intertidal habitat as a result of coastal squeeze, constituting an adverse effect on some N2K site qualifying features (eg. page J-5). Creating new habitats outside of the designated site boundary cannot be considered as Regulation 48(6) <i>mitigation</i>. The plan must therefore be considered to adversely affect the integrity of the N2K sites. Consequently, to be approved, it must meet the tests of Regulation 49 (there being no alternative solutions and imperative reasons of overriding public interest). If these tests are met, the provision of new intertidal habitat outside the boundary of the N2K sites would in our view be required as <i>compensatory measures</i> to meet the Regulation 53 requirement <i>to ensure that the overall coherence of Natura 2000 is protected</i>.</p> <p>The AA is ambiguous in that it also states (in Section 1.5 (page J-5) and page 13 of Form HR02) that <i>such adverse effects can be avoided through the implementation of compensatory measures</i>. However, in as much as the AA does not consider the Regulation 49 tests, and the matrices in Form HR02 conclude No adverse effect on integrity in relation to the N2K sites, we understand that by compensatory measures the AA is misguidedly referring to measured under Regulation 48(6).</p> <p>Furthermore, Regulation 53 would not be satisfied by the SMP simply referring to estimated figures for habitat loss to sea level rise being less than the estimated figures for potential gain to managed realignment, to demonstrate that the compensatory measures can be achieved. The RSPB welcomes, fully supports and is keen to assist in the implementation of schemes within the EA’s Regional Habitat Creation Programme to identify and facilitate delivery of new habitat creation to <i>inter alia</i> compensate for losses to habitats to coastal squeeze. We also support the ongoing Severn Estuary Flood Risk Management Strategy as a vehicle to identify habitat losses and potential opportunities for habitat gains across the estuary. However, it is in our view essential that the SMP policies affecting the intertidal habitats of the Severn Estuary are more clearly aligned with those processes. For instance, notwithstanding the reasons for uncertainty of extent of land implicated by managed realignment policies listed at p.44 of the SMP (indeed, this only goes to emphasise the uncertainty over the timely deliverability of compensatory habitats (see below)), the SMP should in our view attempt to quantify the areas of wildlife habitat (in particular that within N2K sites) estimated to be lost as a consequence of its policies, and that estimated to be gained.</p> <p>We welcome the intent expressed in the AA (Page j-5) that <i>implementation will aim to keep pace with habitat loss on a 1 to 1 basis in the long term, ensuring the integrity of the interest feature of the European sites are</i></p>	Updated HRA issued to EA 7/5/10, addressing all issues identified in these comments. Further amendments may be required following further consultation with NE / CCW.

Comments from?	Comments	Action/Response
	<p><i>not significantly affected as a result of SMP policy.</i> However, expressed as an aspiration in the AA rather than firm commitment in the SMP it fails to give the necessary high level of confidence that the integrity of the N2K sites will not be adversely affected by plan policies. The SMP itself includes limited consideration of Habitats Regulations requirements, and certainly Section 4.2.2 <i>Implications for nature conservation</i>, fails to give the commitments that would be necessary to satisfy the Habitats Regulations. Compensatory measures should be secured before a plan that would adversely affect the integrity of a N2K site can be adopted. To give the necessary level of assurance, we believe that the SMP must commit to the following:</p> <ul style="list-style-type: none"> • Predicting, identifying and monitoring habitat losses resulting from SMP policies for specific N2K habitats. • Replacing habitat losses in a functionally like for like manner, at least on a 1 to 1 basis. • Maintaining an audit, or balance sheet, for each habitat type, of (i) N2K Site habitat losses resulting from SMP policies and (ii) N2K site habitat gains. • Habitat gains at any time exceeding habitat losses. <p>The RSPB has also responded to the Severn Estuary SMP review. The Appropriate Assessment of that plan has not yet concluded but proposes to await the outcomes of the Severn Estuary Flood Risk Management Strategy before reaching any conclusions regarding potential adverse impacts on the Severn Estuary SPA. Although we consider that the information to inform the appropriate assessment of an SMP should be available alongside the SMP consultation, the approach taken seems to us consistent with the requirements of the Habitats Regulations and should in our view also be applied to the Hartland Point to Anchor Head SMP Review to ensure consistency in approach.</p>	
<p>Environment Agency</p>	<p>Initial comments regarding the Appropriate Assessment are provided below. Please note that discussions between the Environment Agency, Natural England and the Countryside Council for Wales are ongoing and any additional comments will be provided as soon as possible.</p> <p>The structure and format for the HRA are generally very good, however, there are a few points which need revision.</p> <p>Section 1.3, page J-3 – the features of interest for the Severn Estuary RAMSAR site should include the fish interests and the overall estuary morphology.</p> <p>Section 1.3, page J-4 – in the paragraph starting ‘No likely significant in-combination effects...’ it is unclear whether the two recent new proposals for the Severn Estuary, i.e. the new container terminal at Avonmouth and the development at Hinkley, have been considered.</p> <p>Section 1.5, page J-5 – the Severn Estuary SAC, SPAS and RAMSAR site makes a number of assumptions with little or no supporting evidence:</p> <ul style="list-style-type: none"> • It states that for most of the Severn Estuary a policy of Managed Realignment or No Active Intervention applies, however, this is not the case. Currently there are 146km of defences, many of which will be retained in the long term. The HRA must consider the possible impacts of both the North Devon and Somerset SMP and the Severn Estuary SMP on the designated site. • It mentions the role of the <i>South West</i> (not Southern) Regional Habitat Creation Programme in mitigating anticipated impacts from coastal squeeze and uses figures based on the overall impact on the Severn Estuary from recent work carried out by Atkins. From this the HRA concludes that any potential impacts can be mitigated for effectively. This does not provide sufficient detail on the likely impacts of the policies contained within this Plan on the site. There is no quantification of the likely habitat losses, or potential gains, arising out of the different policies in each epoch, so for example does the Hold The Line policy widely adopted in the first epoch result in coastal squeeze? How much? And do the Managed Realignment sites balance the books in terms of potential habitat gain? The best estimate of the likely habitat that • could be created in the first 20 years is 500ha across the Estuary (including Steart, Sliimbridge and Congressbury Yeo). This falls short of the 639ha losses due to coastal squeeze estimated by Atkins in the FCRM strategy. We cannot therefore assume adverse effect based on inadequate analysis. <p>Form HR01 – the table identifies that a combination of coastal squeeze, sea level rise and managed realignment could result in significant impacts on the Sandbanks and Reefs which are designated features of the Severn</p>	<p>Updated HRA issued to EA 7/5/10, addressing all issues identified in these comments. Further amendments may be required following further consultation with NE / CCW.</p> <p>Fish and morphology now included in list of interest features.</p> <p>These are now included in consideration of in-combination effects (Section 10 of HR01).</p> <p>Updated</p> <p>Further detail included in HR02, identifying significant adverse effect that will be addressed through IROPI. More detail also provided on achievable compensatory habitat, as provided by the EA RHCP lead.</p>

Comments from?	Comments	Action/Response
	<p>Estuary. It then goes on to conclude (Table 3, Appendix 12, page 11 -12) that these impacts could be mitigated for through the Regional Habitat Creation Programme . This is not the case, as the programme is confined to the creation of new saltmarsh, mudflats and freshwater habitats. The table should be revised and conclude that any impacts on sandbanks and reefs 'are likely to be localised and unlikely to be significant'.</p> <p>The Plan needs editing to ensure it is clear and consistent in its approach. The cumulative effects of policies on adjoining sections of coast should be feasible in planning terms. The HRA will require further specific work to support the conclusion that any likely impact can be mitigated effectively.</p>	<p>Updated to state no longer significant.</p>
<p>Countryside Council for Wales</p>	<p>Thank you for informing the Countryside Council for Wales about the impending completion of the North Devon and Somerset (Hartland Point To Anchor Head) SMP2. We note that the above Plan affects the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar which are all cross-border sites between England and Wales. Therefore, CCW should have been involved in the Plan development in our capacity as a consultant body under the Conservation (Natural Habitats &c) Regulations 1994 and advisers to the Welsh Assembly Government on the natural heritage of Wales and its coastal waters. While we understand that this was a genuine oversight, we are disappointed not to have been consulted and feel that this raises a number of issues which may leave the Plan itself open to challenge.</p> <p>We understand that there is now limited capacity to input or alter this assessment or the Plan itself, therefore, the following comments do not constitute the detailed advice we would normally provide on the HRA content and methodology, but are intended to assist you in developing a consistent approach for this Plan in line with other SMP2s which potentially affect European and international sites around the Welsh Coast.</p> <p>CCW welcomes and supports the efforts made by the Environment Agency, The North Devon and Somerset Coastal Group and your consultants, in respect of this HRA process. Please note that our comments are limited to those sites which lie wholly or partly within Wales and do not cover those sites which lie entirely within England. However, they should be read in conjunction with comments from Natural England as the issues raised may be relevant to the assessment as a whole.</p> <p>We note that this report is described as the “appropriate assessment” rather than a Habitats Regulations Appraisal (HRA). The Appropriate assessment only forms part of the HRA along with the “screening” and “test for likely significant effects”. It should be noted that while the Environment Agency may act as the lead competent authority for the SMP2 process for plans that are “cross border” between England and Wales, the Welsh Assembly Government (WAG) are the Competent Authority with respect to those elements of the SMP2 that lie within Wales at the current time. While the coastal policy units of this Plan lie entirely within England, given the impacts on the Severn Estuary suite of international and European cross-border sites you should clarify if this plan will, therefore, also need to be agreed with the WAG.</p> <p>We understand and appreciate that this HRA has concentrated on the impacts of the proposed SMP2 policies on the European and international sites identified rather than project level impacts that may occur as a result of implementing those policies. We also appreciate that the level of detail that can be considered as part of a plan level assessment is not the same as would be the case for a project level appraisal. However, we must emphasise that this assessment must still address the potential adverse effects as far as is practicable before deferring assessment down to the project level. It should also show that the three prerequisites for deferment are met before adopting this approach; these are that it is not possible for the plan to determine the effects at this level, that the lower tier plan or project is subject to HRA through legislation or policy and that the Plan is capable of being amended subject to the findings of the more detailed assessment.</p> <p>We welcome, therefore, the firm recommendation that there will be a need to carry out more detailed, project level, HRAs on the coastal flood risk strategies and scheme proposals and specific SMP2 policies will only be implemented subsequent to the findings of those assessments.</p> <p>There appears to be some confusion in the Assessment over the difference between mitigation measures and compensation measures. Mitigation and avoidance measures will prevent the identified likely significant effects from manifesting themselves as adverse effects, thus enabling site integrity to</p>	<p>Updated HRA produced which now identifies significant adverse effect on Severn Estuary, to be addressed through IROPI and habitat compensation measures. Further updates may be required following meetings with CCW / NE.</p>

Comments from?	Comments	Action/Response
	<p>be maintained (as defined by the Sites' conservation objectives). Compensation implies that an adverse effect will occur and site integrity will be compromised (for example, the loss of inter-tidal habitat as result of coastal squeeze and its replacement outside the site boundary). Mitigation should be considered as part of the appropriate assessment process and included with the outcomes and recommendations.</p> <p>Compensation forms part of the consideration for any case for Imperative Reasons of Over-riding Public Interest (IROPI) which is put forward and must not be considered as part of the appropriate assessment. There are numerous points within this Assessment where "compensation" is referred to and the implication is that features within the sites are likely to be compromised by the implementation of a certain policy (subject to more detailed assessment) and that alternative habitat will need to be created.</p> <p>We aware that the Severn Estuary Risk Management Study Habitat Delivery Plan sets out a system for addressing the issues of potential habitat loss due to "coastal squeeze" around the Estuary but we understand that this is predominantly outside the boundary of the European and international sites and therefore should be only considered, in the context of losses resulting from the implementation of this plan, as "compensation measures". This may be simply confusion of terminology and the references to "compensation" actually should read "mitigation", but this needs to be clarified as a matter of some urgency.</p> <p>Given these concerns, CCW feel that the assessment should be further clarified before we could fully concur with an assessment finding of "no adverse effects". These particularly relate to issues of mitigation and compensation outlined above, but there are also a number of potential effects in combination with other plans, policies and programmes that need to be further considered or, if already considered, then a more comprehensive rationale for their exclusion should be included.</p> <p>It may be possible to resolve many of the points raised by clarifying the methodology or text but as it currently stands we feel that this HRA appropriate assessment is not completely consistent with other SMP2s being developed and contains some significant discrepancies that may leave it open to challenge.</p> <p>We have copied this letter to Peter Jones at the Welsh Assembly Government (WAG) because of our understanding that WAG is the competent authority for this plan in Wales.</p> <p>I trust these comments are of assistance to you. Should you have any queries please contact Kerry Rogers in our Swansea office or Alison Brown in our Bangor office.</p>	

Appendix K

Comments from?	Comments	Action/Response

Appendix L

Comments from?	Comments	Action/Response
English Heritage – South West Region	<p>(1) L2.1 (g) Policy maps. The text states that only Scheduled Monuments and Listed Buildings were shown for clarity. This is not adequate; the maps should also have included Conservation areas, Protected wrecks, and Registered Parks and Gardens. Having said this, there appears to be a major problem with what has been shown on the Policy maps. For example, there are no un-Scheduled Monuments shown on Exmoor, whereas in other areas there appear to be Scheduled Monuments where none exist and in others, they are missing (e.g. Kilve Chantry).</p> <p>The plotting of listed buildings looks incorrect for some areas and some (see point above for 7d19-7d23) are clearly missing. There appear to be some Scheduled Monuments and Listed Buildings shown in the sea (the SM on Minehead beach is the only one that should be in the intertidal zone). Some of this may be due to 4 figure grid references, but probably not all of it. We recommend that the datasets are re-examined and</p>	<p>(1) See response to this comment in Section 3 above. <i>(NB: refer also to action/response in Section 3 in relation to these comments from English Heritage).</i></p> <p>(2) Text has been amended to clarify data sources and add in what data was supplied by Exmoor National Park.</p> <p>(3) Text has been amended as advised.</p> <p>(4) Text has been amended to clarify and remove reference to Jurassic Coast.</p>

Comments from?	Comments	Action/Response
	<p>replotted, having been checked with the Historic Environment Record Officers for Devon, Somerset, Exmoor and North Somerset. As it stands, we are not confident that the implications of the preferred policies have been correctly identified, as the maps show problems with the datasets.</p> <p>(2) L2.3 (c) Theme maps. The title 'Data obtained from English Heritage' is misleading as the text then states that data from County Archaeologists was supplemented with national datasets. There is no indication that data was collected from the Exmoor National Park Historic Environment Record. The list of what was collected is a little confusing.</p> <p>(3) The classes of Historic Environment assets available from the data sources were / should have been: Scheduled Monuments, Grade I, II* and II Listed Buildings, Protected Wrecks, un-designated wrecks, Conservation Areas, Registered Parks and Gardens, Historic Battlefields and non-designated archaeological sites.</p> <p>(4) The reference to the Jurassic coast WHS may refer to the South Devon and Dorset SMP?</p>	

Comments Relating to Specific Locations

Lundy – 7c01 and 7c02

Comments from?	Comments	Action/Response
North Devon's Biosphere Reserve	We support the policies proposed for Lundy.	Noted. No action required.

Hartland Point to Westward Ho! – 7c03 to 7c05

Comments from?	Comments	Action/Response
Clovelly Estate Co. LTD	(1) We support "Hold the Line" for Clovelly. We fear that existing structure will be in jeopardy before 2025 if protective structures are not already in place by 2025. We recommend serious consideration is given to a new harbour wall, identified in our previous submission in 2009. (2) Your anxiety about the pebble transfer is noted, but we believe a more rigorous scientific appraisal is necessary to identify destination of the pebble movement.	(1) We have reviewed that data already held and added mention of possible need to not only maintain but also possibly improve defences at Clovelly in the first epoch. (2) Comment has been considered when developing Action Plan.
Resident of Bideford	Bucks Mills is about a kilometer from my home and somewhere I visit frequently and have a great attachment to. It would be lovely to think that it could be protected for ever, but the case made out in the SMP is compelling. The cultural history of the village is rich but well documented and, while it is hard for me to see the eastern lime kiln deteriorating each winter, I could not justify the spending of public monies to protect it	Comments noted – no action required. Should be noted that the plan does not prohibit continued defence at Bucks Mills if other funds are available for this.
English Heritage – South West Region	7c03-7c05 - We are very concerned at the potential loss of the Bucks Mills Conservation area, which includes 14 Grade II Listed Buildings, in the medium term. We would appreciate further clarification on why the continued defence of Bucks Mills would be unlikely to attract public funding, particularly as the summary acknowledges that defences along this short length of coast would be unlikely to have a significant impact on coastal processes.	The erosion risk to Bucks Mills is considered insufficient to justify any public funds (in terms of flood and coastal defence budget). However, recognising that defences here may be desirable, the policy does allow defence here if a case can be made and alternative funding sought. Appendix H has been revised to make such issues clearer and this revision includes highlighting this point.
North Devon AONB	We agree with the policy proposals in this section although we remain concerned about the potential loss of heritage features associated with the small coastal settlement at Bucks Mills (7c05). The harbour wall, lime kilns and coastal properties are all an integral part of the North Devon AONB and a loss of access to the beach would have an effect on the recreational assets of this part of the AONB. We note that currently, it is acknowledged that the existing defences do not have a significant impact on coastal processes. However, we would not wish to see larger defences as this location as it could impact on both the coastal processes and the local landscape in the area.	(1) The erosion risk to Bucks Mills is considered insufficient to justify any public funds (in terms of flood and coastal defence budget). However, recognising that defences here may be desirable, the policy does allow defence here if a case can be made and alternative funding sought. The implications table will be amended to ensure the features mentioned are included as part of the AONB. (2) The size of defences would be an issue to consider should funds be available to replace defences here. We have added mention of this in the statement to reflect this concern.
North Devon's Biosphere Reserve	(1) Agree with the policies stated. In the summary the transfer of pebbles across the mouth of Clovelly Harbour is taken out of context. This practice would ensure that the erosion to the east of Clovelly was not exacerbated by sediment starvation. Although a practice in 7c04 it has more relevance for 7c05. Non intervention along these cells will result in unavoidable archaeological loss at Bucks Mills and the Gallantry Bower and Windury head in epochs sooner than stated.	(1) Text has been reviewed and changed from 'This will be supported by' to 'Implementation of this policy would need to consider the continued annual ... to reduce sediment starvation downdrift'. (2) Losses have been reviewed and the timeframe listed in the implications table is correct based in the data available.
Environment Agency	Buck's Mill' should be 'Buck's Mills'.	Text has been amended throughout to be corrected to 'Bucks Mills'.
Environment Agency	7c04 Unsure of the link made between '...annual transfer of pebbles across harbour...' and Hold The Line FRM policy. Our understanding is that pebble transfer is for navigation purposes only. Clarification is needed if pebbles are managed for FRM purposes. Defences will have to be raised, or temporary defences used, over the long term. Individual property defences should be considered.	We have revised the statement text to indicate that any works at Clovelly will need to consider potential impacts on shoreline sediment transport.
Devon County Council	I. Historical The kilns and associated structures have a rich history and are integral to the conservation area and of Bucks Mills. As pointed out (by David Gale in a previous e.mail) the structures are Grade 2 Listed under the Town and Country Planning Act and are therefore Protected by UK Law. This means that whatever the Shoreline Management Plan says or does not say, these structures are culturally worthy enough to be protected and this had been recognised in the Law of the Land. So, the protection of the Lime Kilns and associated coastal structures at Bucks Mills is not in question. Amenity	We have reviewed the implications tables to ensure these points are adequately referred to.

Comments from?	Comments	Action/Response
	<p>The Bucks kilns and associated structures allow access to the beach for local and tourist use. There are public rights of way that should be kept open and for all to enjoy – again this is enshrined in Law. The upkeep of our local and important amenities should be a priority for our Council.</p> <p>The kilns and associated structures are used by local fishermen some of whom undertake commercial fishing/lobster pots – access to and use of the coastal structures is vital.</p> <p>Tourism</p> <p>Clovelly is not the only important venue in this area contrary to what is said in the Shoreline Management Plan.. Bucks Mills plays a significant part in attracting tourism to our area. The public car park and information notice boards and access to the beach enable Bucks Mills to contribute to the economy of the area helping to maintain local employment. This can be seen by the large number of visitors to Bucks Mills throughout the year – spending their money in our local area. Without the kiln and associated structures and access to the beach tourism in the area will be detrimentally affected.</p>	

Westward Ho! and Northam Burrows – 7c06 to 7c08

Comments from?	Comments	Action/Response
Resident of Bideford	<p>I am quite prepared to accept Professor John Pethick's surmise that the current pebble ridge may be only 500 or 600 years old and I recognise that in my own life time, it has migrated inland by at least 5 metres. So a watching brief does seem to be the obvious line to take. However, the short-sightedness that led to the Bideford area's domestic waste tip being located near Greysand Hill and the paucity of records as to what was tipped there pose real dilemmas as to what should be done (and who should bear the costs!) at the far end of the ridge.</p> <p>My wife (a member of the Royal North Devon Golf Club) and I disagree about the fate of the golf course as we would! Perhaps some limited term intervention is appropriate for Northam Burrows whilst the problem of the waste tip is tackled and the golf club given sufficient time to find and develop a new golf course (but as my wife says, it will not be another links course and so 'not the same').</p>	<p>(1) Proposed policy includes the possibility of limited intervention along the pebble ridge so this is already recognised in the statement, along with the need to manage the risk to the tip site. Therefore no action is required to address this comment.</p> <p>(2) We have reviewed the implications table and commented that adaptation of the Golf Course and its infrastructure will be required.</p>
Royal North Devon Golf Club	<p>It is hoped that the new Plan will see some engineering works to stabilize the Pebble ridge at the Estuary and therefore prevent sea inundation. This would protect our course interests and the former refuse tip!</p> <p>ANY OTHER COMMENTS: Action soon please.</p>	<p>The Plan only sets policy and steers where more detailed study and/or intervention is needed in the immediate term. This is something that has been included in the Action Plan. The proposed policy includes the possibility of limited intervention along the pebble ridge so this is already recognised in the statement, along with the need to manage the risk to the tip site. No further action required.</p>
Local Resident	<ol style="list-style-type: none"> During the 'consultation' period the AG have displayed no wish or intention to conserve Northam Burrows by preventing erosion. Arising from the above, the stated policy is "Retreat" i.e. confirmation of the existing policy. The alternative policy of 'Conservation' has never been really considered. The 'Preferred Policy' statement (Oct 09) reveals the underlying shortcomings of the 'Retreat, Managed Realignment' policy in dealing with coastal natural processes. Hopefully, one day, those now peddling the naïve doctrine of 'Retreat with Nature' will wake up to the fact that our Island land is invaluable. In the meantime its gratuitous loss is reprehensible. For supporting information please read my Report of Dec 08. <p>1st Nov 09</p> <p>ANY OTHER COMMENTS: The 'consultation' documents were helpful in illustrating, without doubt, the intention to continue the policy of accepting the process of erosion. The 'consultation' in respect of Northam Burrows was/is merely a formality of providing 'notice of intent.'</p>	<p>(1), (2) In developing policy options for Northam Burrows, the option to hold the line for all three time periods was appraised in full, along with a number of other possible options. These options were consulted upon with the Coastal Group, key stakeholders and elected members. From this process it was found that the most appropriate option is for Managed Realignment involving pro-active measures to be investigated and implemented.</p> <p>(3), (4) The MR option allows a flexible approach to managing this very dynamic frontage and is therefore considered the best option.</p>
Northam Burrows 1716 Committee	<p>Comment on your statement:</p> <p>"Implementation of this policy will need to consider allowing <u>tidal inundation</u> further into the eastern side of Northam Burrows to help the wider Burrows adapt to sea level rise.</p> <p>Again I point out that the road and bund along the Skern on Shell Ridge is made up of Rubbish – about ¾ of a mile in length about 30' wide and about 25' deep of rubbish. God help the estuary if you ever breach this!</p>	<p>It is recognised that implementation of this policy required further investigation and we take due note of the comment. The text has been amended to clarify what is meant by this statement and to identify the need to investigate the extent of landfill under the road prior to any works being undertaken.</p>

Comments from?	Comments	Action/Response
North Devon AONB	<p>(1) In terms of proposed policies for each of the Policy Units along the North Devon Coast we are in broad agreement with the exception of 7c 07 Northam Burrows.</p> <p>(2) Many unanswered questions remain about a policy of managed re-alignment in this section. The two key issues within this section, are likely to be the loss of certain habitat and species associated with the SSSI habitat at Northam Burrows (although it is acknowledged there could be gains as well) and the potential issues associated with protecting the former landfill site at the northern end of the Burrows.</p> <p>(3) We would recommend that further monitoring and investigation continues before deciding on a definite policy and we are confident that this would be the case. However, the text should emphasise the need to reassess options as time progresses so that more feasible strategies may be deployed in the future.</p>	<p>(2) The issues cited regarding the former landfill site are already reflected in the policy statement. We have reviewed the statements regarding the SSSI site, further to your comments.</p> <p>(3) It is agreed that further monitoring and investigation would need to be undertaken in support of this policy: this has been stated further in the Action Plan developed as part of the final SMP. We have also amended the text to ensure that this uncertainty is reflected in the policy statement.</p>
Resident, Northam	<p>(1) Your consultation summary for North Devon and Somerset Shoreline Management Plan Review (Published Oct. 2009) does not seem to cover one of the most important factors which could influence our coast line and the deposition or erosion of sediments along that coast. For the past fifty years or more sand and gravel dredgers have been removing thousands of tons of sand and gravel from the Bristol Channel sand bars between North Devon and South Wales. (Nash and Scarweather Sands etc.). During the same period I have noticed a marked decline in the depth of sand deposited on the beaches at Westward Ho! and Northam Burrows (policy units 7c06 to 7c08). This has been most noticeable in the fact that the wreck of the 18th century ship 'Sally of Bristol', wrecked 15th September 1769 (SS431298) is now usually visible throughout the year when it was previously only visible for short periods in the winter, and then only every five to ten years.</p> <p>The Westward Ho! 'Kitchen Midden', banks of peat and a Neolithic site (SS430295) are also exposed for long periods when they were previously covered by over a meter of sand or more for most of the year.</p> <p>(2) I therefore think that a new survey is required to assess the way in which sand and gravel extraction in the Bristol Channel is changing sediment transport in relation to the whole coastline under review. This will have consequences for the proposed off shore power generation industry and could be financed as part of that project.</p>	<p>(1) The objective of the SMP is to set high-level sustainable policies which will inform future management of this coastline over the next 100 years. Although the implementation of these policies could be affected by offshore dredging activities, derivation of the policies themselves is not. In appraising coastal processes and shoreline evolution along the coast, the SMP has considered any potential link between these offshore banks and the shoreline, based upon existing information; but has not undertaken any new studies to determine any potential impacts from dredging activities. Any information included in the SMP is therefore based upon available information. Therefore, although the concerns raised are noted, no further action is to be undertaken.</p> <p>(2) We do, however, recognise that there is a general need to more fully understand the sediment dynamics within the Bristol Channel and has been recommended within the Action Plan. As suggested this type of study would also assist in appraisal of future offshore schemes.</p>
Devon County Council	<p>7c07 Northam Burrows</p> <p>(1) This policy unit is of considerable concern for the County Council. The principal concern is that climate change effects will, in the long term, have the potential to threaten the former landfill site by increased erosion rates and increases in the occurrence of significant storm events exacerbated by a rising sea level. The short term policy of 'managed realignment,' given the qualifications provided in the text, is seen as feasible. The natural movement of the Pebble Ridge is recognised and it should be noted that this was confirmed by the investigative work undertaken by Dr John Pethick.</p> <p>(2) This policy may be feasible in the medium term but a note of caution might be included in the text to illustrate that it is essential to monitor, closely the actual occurrence of climate change effects. In the long term the possible inability to defend the landfill site should be recognised. There is sufficient uncertainty in the predictions for climate change effects that it is not possible to say, today, whether it will be feasible from technical or regulatory standpoints to 'hold the line' around the former landfill site. The policy might create an island which could lead to excessive costs to defend.</p> <p>(3) The text of the SMP should reflect the need to reassess options as time progresses so that the most feasible option can be deployed in the future. This viewpoint should also be reflected in the options for the Policy Unit for the Skern to Appledore (7c08.) The County Council welcomes the preparation of the Taw Torridge Study and subsequent Strategy. It also wishes to discuss with the Environment Agency the possibility of complementing the Taw Torridge Strategy development with an allied investigation concerning coastal erosion.</p> <p>(4) 7c08 Skern salt marsh to Appledore (west) Agree to hold the line for the reasons stated. However geomorphological advice suggests that the road should be made more permeable to allow warping up of the land to increase its resilience to sea inundation.</p>	<p>(1) No action required.</p> <p>(2) The text has been amended to reflect this uncertainty and that in this dynamic location, the policy approach does need to be flexible.</p> <p>(3) Comments have been noted and have been considered in the preparation of the Action Plan.</p> <p>(4) The text here has been amended to clarify this point, but noting that any such measures should not compromise landfill beneath the road along this frontage.</p>
North Devon's Biosphere Reserve	<p>The policies are broadly correct.</p> <p>(1) 7c07 - The Pebble ridge mapping should reflect the rotation expressed in the text rather than a straight roll back.</p>	<p>(1) The mapping has been reviewed and amended.</p> <p>(2) We have added mention of this to the policy statement.</p> <p>(3) We have reviewed the text and ensured this is included, but have also added comment on concerns</p>

Comments from?	Comments	Action/Response
	<p>(2) There is a protocol agreed with Natural England for the repairs of breaches to pebble ridge should they occur. This should be reflected in the text in the form of minor interventions rather than left to reseal by littoral processes. (This may not always work on its own).</p> <p>(3) 7c08 - We have consistently stated that the 7c08 should be hold the line for coastal erosion but allow the structure to be permeable. This will enable warping up of Northam Burrows to build resilience to greater sea inundation. This policy was a result of the work with Prof. John Pethick and should not be dismissed.</p> <p>(4) In the possible impacts for the SEA; it is questionable about the loss of tourists given almost all come for the beach which will still exist.</p>	<p>expressed by others regarding the landfill under the road.</p> <p>(4) The text has been reviewed, to focus more on the potential loss of facilities and possible access issues.</p>
Natural England	<p>7c07 (Northam Burrows). At Northam Burrows, rock armour protects the tip of a pebble ridge. As the rock armour prevents natural process from occurring, the SSSI unit is classed as in “unfavourable condition”. There are also revetments which defend an access road to the old landfill site alongside the high water mark just inside the estuary (Skern). This unit of the Taw Torridge SSSI is also in “unfavourable condition” because of the revetments. The policy for Northam Burrows (7c07) is managed realignment, but to continue to protect the former landfill site. From this, it is difficult to establish if the intention is to remove the rock armour at the tip or not. The policy for the Skern (7c08) is hold the line. In both cases, maintaining the present inappropriate hard coastal defence will keep the SSSI units affected in unfavourable condition.</p>	<p>We have reviewed the statements regarding the SSSI site, further to your comments.</p> <p>Given all of the considerations we do not feel it would be appropriate to realign along 7c08, due to the risk to the landfill site in particular (as it will likely be prohibitively costly to decontaminate this area) and also with a view to both the whole Northam Burrows area whereby holding this area allows maximum land area to adapt land use from affected seaward parts, as well as retaining a controlling influence for the wider Taw/Torridge Estuary.</p>
Environment Agency	<p>7c06 Long term: consider Managed Realignment.</p> <p>Paragraph included in unit 7c07, ‘Continue to reduce flood and erosion risk...along southern part of Northam Burrows by constructing low embankment...’, needs to be included in this unit.</p> <p>Flooding will increase along the frontage with higher sea level and larger waves. Any new defences in this unit will be difficult and very expensive. New defences will have to raise current beach levels, particularly from the putting green to the slipway. Coastal squeeze is a major issue. In the long term developments will have to be relocated from along the frontage/risk area to higher ground.</p> <p>Development types in the risk area should only be low vulnerability (PPS25) over the medium to long terms, for example, tourism assets with a low consequence when flooded or that could be moveable during the winter. Inland secondary defences would be necessary for existing properties, etc, with a primary defence to ‘protect’ the improved esplanade during minor events.</p> <p>Defences will need to be built north of Golf Links Road, to realign the burrows, however, perhaps future developments should be limited to reduce the defences required.</p> <p>Nassau Court is shown in front of the erosion line. Is this correct?</p>	<p>We do not believe that long-term Managed Realignment of Westward Ho! would be appropriate given that there is little room available to realign to and to do so will also be equally expensive and have significant impacts on tourism and amenity assets which will impact on the wider economy of the area. We do not believe there is significant risk from sea level rise over the next 100 years to warrant such a long term policy.</p> <p>We have revised the text to clarify coastal squeeze as being an issue.</p> <p>Options to reduce flood risk to people and property such as those suggested here for future development at Westward Ho! and along Northam Burrows could be taken forward in discussion with planners following the SMP but we do not feel that a long term change in policy is correct.</p> <p>Having reviewed erosion data on policy maps it has been realised that there is an error in how they lines plotted in the software. All erosion lines have shifted and so are not shown in their correct positions on the draft maps. This has been corrected in the final maps.</p>
Environment Agency	<p>7c07 Need to ensure the Action Plan and future Strategy have Devon County Council action to deal with recovery of landfill material if it becomes exposed as a result of Managed Realignment at the site.</p> <p>To allow these policies, work will have to be done to allow the ‘back burrows’ to flood more easily during a normal tide. At present, the Pimpley Bridge and siltation restricts water flowing in or out of this area. It may be necessary over the long term to start retreating parts of the golf course to higher ground, for example, farmland.</p>	<p>The Action Plan includes an item to address this comment.</p> <p>We have reviewed and amended the policy statement text to clarify this point further, noting also concerns raised by others about implications for landfill along Skern frontage.</p>
Environment Agency	<p>7c08 Opportunities to expand the salt marsh and options to allow controlled flooding of some land should be investigated as part of Hold The Line.</p>	<p>We have revised the text to clarify this point, noting also the concerns of others about landfill under the road along this frontage.</p>

Comments from?	Comments	Action/Response
Resident of Bideford	<p>(1) The Torridge estuary is not as consistently steep as the report implies and there are extensive flats along the eastern side of the estuary, which were reclaimed in the nineteenth century at about the time the railway was built.</p> <p>(2) This is now the very popular Tarka trail and likely to be sustained by some form of protection. Can we have both the Tarka Trail and somewhere for the salt-marsh to migrate and some form of flood surge protection for Bideford?</p>	<p>(1) We have amended the text in section 4.1.5 to address the point made.</p> <p>(2) In setting policy there is always an issue of balancing various objectives. The identification of areas where a policy of managed realignment rather than hold the line is more appropriate, will depend upon additional studies, as being undertaken for the developing Taw-Torridge Estuary Strategy Study (being led by the Environment Agency). This study should consider options to retain the trail either along its existing or in a realigned route.</p>
Local resident	<p>Protection of Barnstaple with its Economic Importance is dependent on A. Tidal flows and height, B. And flood water from the Upper Taw and catchment area.</p> <p>Problems historically occur when the two coincide with a high tide. The suggested “No Active Intervention” on the flood banks of agricultural land above Barnstaple would have serious implications if they were not in place. At the moment, at times of heavy rainfall, the water rises to the banks which act as a funnel allowing limited water down to Barnstaple and forcing the flooding of several hundred acres above them to act as a temporary storage area. If the banks were not in place the water would go to Barnstaple in one surge causing the water level to rise, I would estimate 0.8 m with serious economic implications.</p>	<p>The policy stated above Barnstaple in this area requires more detailed study in the near future as there is insufficient information available to the SMP to state precisely which areas in the upper Taw (and upper Torridge) estuaries should be subject to No Active Intervention, where defences need to be maintained under a Hold the Line policy, or where there are feasible opportunities to undertake Managed Realignment.</p>
Local Resident	<p>I believe that the estuary is an area of natural beauty, and as such should be allowed to evolve naturally. But there is at present an application in with Torridge District to put a huge development on the riverside at Knapp, including a marina, which will ruin the natural outlines of the river.</p>	<p>It is not possible for the SMP to comment on proposed developments, but the recommendations of the SMP will feed into the planning process. The suggested development would also have to demonstrate that it did not adversely affect the natural environment. No further action required.</p>
RSPB	<p>(1) 7c09, 7c11, 7c13, 7c14, 7c15 Hold the line policies in these Policy Units will cause coastal squeeze and loss of inter-tidal habitats, including habitats designated as a Site of Special Scientific Interest. These losses should be quantified within the SMP to determine its ecological impact.</p> <p>(2) 7c12 Whilst we welcome the recognition of opportunities for managed realignment in this Policy Unit, to create new areas of intertidal habitats, we question why the overall policy is one of no active intervention.</p> <p>(3) Whilst we accept that the Taw-Torridge Estuary strategy study will provide the detail needed to determine exact locations and nature of opportunities for managed realignment, we consider that areas that are considered to have potential should be identified in the SMP.</p> <p>(4) 7c16, 7c17, 7c19, 7c20, 7c21, 7c22, 7c23, 7c24, 7c25 Hold the line policies in these Policy Units will cause coastal squeeze and loss of inter-tidal habitats, including habitats designated as a Site of Special Scientific Interest. These losses should be quantified within the SMP to determine its ecological impact.</p> <p>(5) 7c16, 7c17, 7c22, 7c23, 7c24, 7c25 We welcome the policies for managed realignment in these Policy Units, to create new areas of intertidal habitats, however we question the deferral of this policy to the Medium term, with hold the line the short term policy. We accept that the Taw-Torridge Estuary strategy study will provide the detail needed to determine exact locations and nature of opportunities for managed realignment. However, we believe that broad areas that are considered to have potential for realignment should be identified in the SMP and that work to progress them should be undertaken in the short term in order that they can be implemented when this work is complete. The policy would appear to defer the implementation of managed realignment opportunities for at least 20 years, which in our view is an excessive delay.</p> <p>(6) The SMP needs in our view to be more specific about areas of freshwater habitat that would be affected by policies of no active intervention and managed realignment, particularly where those habitats are designated as Sites of Special Scientific Interest. It is essential that the SMP process is aligned with River Basin Management Plans and Catchment Flood Management Plans in order to ensure that designated freshwater interests can be created elsewhere before they are lost as a consequence of coastal defence policies adopted in the SMP. It is not clear that this exercise has been undertaken.</p> <p>(7) 7c20 Whilst we welcome the recognition of opportunities for managed realignment in this Policy Unit, to create new areas of intertidal habitats, we question why the overall policy is one of no active intervention. Whilst we accept that the Taw-Torridge Estuary strategy study will provide the detail needed to determine exact locations and nature of opportunities for managed realignment, we consider that areas that are considered to have potential should be identified in the SMP.</p>	<p>(1), (4) Whilst this impact of the policy is recognised, it is not possible to quantify in any meaningful way the losses that would occur. These would need to be assessed in greater detail as part of a subsequent study such as the planned Taw/Torridge Strategy Study.</p> <p>(2), (7) The policy in 7c12 and 7c20 is one of NAI where no defences are present but with option to defend (HTL) or realign if opportunities arise. Too little data is available to the SMP to be definitive, hence the options are left open for a more detailed study to look at this and decide the most appropriate management options in distinct areas. The policy ‘label’ should be read in conjunction with the supporting text for the whole SMP.</p> <p>(3), (5) It has not been within the remit of this SMP to undertake a detailed study of the estuaries, instead a high level review of the CFMP policies has been undertaken to assess where policies may be inappropriate. Given the timescale of the strategy study it would also seem counter-productive to pre-guess the outcome of more detailed studies and potentially mislead residents and other interested parties. The HTL policy in the short term reflects the significant uncertainty about how realignment in any one part or several parts of the estuary would impact upon the whole system. HTL in the short term therefore allows sufficient time for greater monitoring and investigation. It does not preclude MR occurring earlier in the medium term if found appropriate to do so by more detailed studies. We will consider clarifying this point in the policy statements.</p> <p>(6) Further to the comment, we have reviewed the information and considered it not appropriate to add more detail to the implications tables. However, we have also reviewed the documents to ensure sufficient reference to CFMPs and WFD is made.</p> <p>(8) The MR policy here is not simply for habitat creation. Intent is for NAI but with intervention for flood risk benefits in other parts of the inner estuary if needed to provide defence function. We have reviewed the text and feel this point is clearly made.</p>

Comments from?	Comments	Action/Response
	(8) 7c26 We welcome the policy for managed realignment in this Policy Unit, to create new areas of intertidal habitats.	
North Devon AONB	<p>(1) In terms of proposed policies for each of the Policy Units along the North Devon Coast we are in broad agreement with the exception of 7c 07 Northam Burrows; 7c 26 Crow Point and Crow Neck; 7c25 Horsey Island to Crowe Point.</p> <p>(2) In addition, whilst Policy units 7c23 Braunton to Horsey Island and 7c24 Horsey Island, technically lie outside of the designated AONB, they do form a part of the defined North Devon Heritage Coast and this is considered a part of the AONB Management area.</p> <p>(3) 7c23- Braunton to Horsey Island and 7c24 Horsey Island forms a part of the North Devon Heritage Coast. We would agree with the proposed policy here which is to hold the line in the short term and then investigate managed re-alignment and implement dependent on the outcome of the studies. However, we would advise that the line to be held would follow the existing banks along the west bank of the River Caen and then along the Great Bank (originally created in the 1st reclamation in 1809 . This would conserve the integrity of two key landscape and heritage features namely Braunton Marshes and Braunton Great Field as well as conserving locally important agricultural land. In addition, it would be important to maintain the line of the marsh road, which gives access to the Braunton Marshes, Crow Point and the southern end of Braunton Burrows. It should be noted that the preservation of the second bank, protecting Horsey Island is very much a part of the heritage of Braunton and many residents look upon this as the first line of sea defence for the village. Therefore, any suggestion of managed re-alignment needs to be thoroughly investigated with the benefits fully presented to the local community and a reassurance that this policy would not affect the village of Braunton.</p> <p>(4)7c26 Crow Point and Crow Neck We believe, there is a need to emphasise the need for further investigation here before adopting firm policies for this section. The spit at Crowe Point has been maintained in previous years and the implications of realignment potentially could have a large impact on the on the coastal processes within the Taw and possibly even the Torridge Estuaries. This could have a positive or negative effect on habitat within the Braunton Burrows SAC and Taw & Torridge SSSI. It will undoubtedly affect the built environment and navigation within the estuary. Whilst existing studies would tend to discount the importance of Crow Point, it is nonetheless vital to continue to carry out further investigation to help inform management decisions here.</p>	<p>(2) We have amended the text to reflect this.</p> <p>(3) The points raised have been noted. The SMP only provides indication of possible realigned positions. The final line would be subject to more detailed investigation and no pre-conceptions about where (if any) a realignment would occur should be made that preclude all possibilities at this stage.</p> <p>(4) The concerns raised about Crow Point are reflected in the policy statement already and retain the option to intervene if necessary and appropriate to do so following more detailed investigation.</p>
English Heritage – South West Region	7c16-7c26, P.81 - The plan summary notes that the Yelland Stone Row Scheduled (not Schedule) Monument, Braunton Great Field and Braunton Conservation area could be at risk if managed realignment schemes are implemented. This is not picked up in the table on pages 85-86. We would appreciate clarification as discussion at Stakeholder events suggested that the Braunton sites, particularly Braunton Great Field, would not be at risk.	Yelland Stone Row is not mentioned in the implications tables therefore it has not been amended. Text reviewed as noted and the implications table amended as appropriate.
North Devon Council	<p>7c14 - No comment 7c15 - No comment 7c16 - No comment 7c17 - Mark defences at Fremington Quay and along the Fremington Pill to Muddlebridge House 7c18 - May be worth mentioning why Penhill Point is not being considered for Managed Realignment 7c19 - No comment 7c20 - I would like the SMP2 to consider managed realignment on both sides of the River Taw on the whole of this unit. May assist in reducing the flood risk to Bishops Tawton. 7c21 - No comment 7c22 - No comment 7c23 - No comment 7c24 - No comment 7c25 - Hard to see map detail 7c26 - Hard to see map detail</p> <p>Specifically there are reservations over managed realignment in respect of the Taw and Torridge Estuary. The short term policy is to maintain the existing defences while more detailed investigations are undertaken to support moving towards the long term vision. Medium term is to implement managed realignment. It is important that NDC are consulted regarding all stages of any proposed managed realignment. I assume the EA will lead with any proposals. Do you know if any studies have been carried out yet?</p>	<p>7c17 – we have split Fremington out into its own unit to make it clearer that the intent of the plan here is to HTL.</p> <p>7c18 – having reviewed the text we have added further explanation as to why the policy is NAI.</p> <p>7c20 - The management in this area is very much left open to more detailed investigation as there is insufficient information available to the SMP to determine exact policy for distinct lengths. The SMP policy unit maps merely indicate potential realignment areas. These are not definitive and more detailed study would look at the whole area. MR would only occur following much more detailed investigation and consultation, and only then if appropriate to do so. This is reflected in the text. The proposed Taw/Torridge Strategy Study, being led by the EA, would be a starting point for such investigations.</p> <p>7c25, 7c26 – we have amended the maps and sought to make them clearer.</p>
Devon County Council	(1) 7c12 Upper Torridge Estuary (east and west banks between Bideford and Wear Gifford.) The County Council wishes to be consulted as the Taw Torridge Estuary Study and Strategy are developed to	(1) The SMP only provides indication of possible realigned positions. The final line would be subject to more detailed investigation and no pre-conceptions about where (if any) a realignment would occur should be made

Comments from?	Comments	Action/Response
	<p>determine if there are cumulative implications for County Council investments in the Tarka Trail and South West Coast Path in this area, taking into account the habitat recreation already undertaken by the Biosphere Reserve team. It is unclear where the managed realignment option may be deployed from the maps presented in the document.</p> <p>(2) 7c19 Penhill Point to A39 The land behind this stretch is suitable for re-alignment for habitat gain and should be open for consideration. Such alignment should not compromise the natural life of the Tarka Trail in the short to medium term.</p> <p>(3) 7c16 Instow to Yelland; to 7c26 Crow Point and Crow Neck The County Council objects to the managed realignment policies for these units as worded currently. Whilst the advantages of the managed realignment policy are recognised there are concerns relating to County Council investments in the Tarka Trail in these areas and sufficient reassurance is sought within the text of the SMP.</p> <p>(4) There is also a need to ensure that proposals in Unit 7c26 ensure the long-term viability for safe navigation with regards navigational lights. Given this, realignment of Crow Neck is generally supported.</p>	<p>that preclude all possibilities at this stage. Detailed studies would necessarily consider all potential impacts on features and interests in the area.</p> <p>(2) MR here was appraised but felt to be less viable due to the small amount of potential gain for the cost likely to be incurred in realigning the defence and Tarka Trail in this area. We have split this unit into 2 parts to make it clearer where MR is more feasible. Text in the first part of policy statement has also been amended to mention possible options regarding the Tarka trail throughout the estuary where MR is proposed.</p> <p>(3) We have amended the text to address this comment, although policy can not be justified on the basis of protecting paths and trails alone as to do so is in consistent with position statement of the South West Coast Path.</p> <p>(4) We have amended the text to reflect the comment and ensure navigation issues are addressed in the implications tables.</p>
Braunton Parish Council	<p>(1) 7c22 The proposals state that the impact on archaeological features, the impact on current defences, flood defence measures and the loss of agricultural land would not be known until further study was made. Council would not agree to any proposals until this study had been undertaken and all information made available.</p> <p>(2) 7c23 Council is concerned that any realignment in this area would affect the present defence system which is the first line of defence for the village of Braunton, most of which would otherwise be flooded as it is below sea level. Council is also concerned that the plan focuses more on the benefits to the estuary as a whole and towns that are directly on the estuary, i.e. Barnstaple, at the expense of other areas such as Braunton and the surrounding areas. Not sufficient emphasis is placed on the defences for Braunton and the architectural and agricultural sites surrounding it. Council would wish that any proposals be discussed at the earliest stage with the Parish Council and businesses and residents of Braunton who would be affected.</p>	<p>(1) We acknowledge the concerns raised. Given the need for a more detailed study, it was not thought appropriate for the SMP to pre-guess the outcome of such studies in term of potential realignments and therefore the resultant impacts. The SMP must, however, set out a long term vision for a coast and Defra guidance states that policy decisions can not simply be deferred until data is available. The SMP clearly identifies the need for additional studies and recognises that the implementation of policy will depend on these. Such studies would include full consultation and so parish council would be able to comment at that time.</p> <p>(2) We have added further clarification in text that any realignment would not seek to increase flood risk to people, property and infrastructure at any settlement around the estuary, including Braunton, although recognising that there is a need for more detailed investigation of the whole area to determine the right future management in each area and that some impacts on such assets may be necessary to achieve the aims of the policy.</p>
North Devon's Biosphere Reserve	<p>Torridge Estuary: Broadly in agreement with the policies.</p> <p>(1) 7c12 - Where the Tarka Trail may be compromised by the policy. Consideration should be given for making it a permeable structure, but still usable by the vast numbers of visitors and locals.</p> <p>(2) 7c15 - The definition of unit needs to be re-considered. Part is a length of flood defence, the rest is a beach backed by a wall (with no flood defence function) and by dunes. The hold the line policy may not be consistent for the whole length.</p> <p>Taw Estuary</p> <p>(3) The Tarka Trail is the defence line around much of the Taw estuary. Whilst there are no objections to retreating the flooding line beyond the former railway, any actions should seek to hold it in place if feasible. This has implications for policy units: 7c16, 7c17, 7c19, 21 and 22.</p> <p>(4) In 7c16, the policy unit includes the former power station which is a contaminated site and had economic potential for the renewable energy sector. I suggest this is a separate policy unit with hold the line as the consistent policy.</p> <p>(5) 7c19 holds considerable opportunity for habitat creation and whilst we would encourage the Tarka Trail to persist, modifications can be made for realignment of flood defences to allow habitat creation. This should be reflected in the policy text.</p> <p>(6) 7c22. The new maintained flood defence line is already landward of the proposed line of retreat.</p> <p>(7) 7c23 It seems a great challenge to implement a realignment here due to the road infrastructure and the cultural/archaeological assets here. Accommodation of flood plain and wider tidal sections of the Caen can be done on the Chivenor side. I recommend this section remains hold the line.</p>	<p>(1) This is a valid point and may be appropriate in some locations. We have added mention of this to be considered in detailed study in the short term.</p> <p>(2) We have split the Instow unit into 2 parts to better reflect the different nature of the frontage. However the intent of the policy to continue to protect Instow remains.</p> <p>(3) We have reviewed the text for the relevant sections. No amendments to the implications table were required. However, in general, this is a detail for further investigation at scheme level on how exactly realignment could occur. We have added mention of the possible options in areas where the Tarka Trail occurs with a MR policy to the policy statements.</p> <p>(4) We have amended the text the text in the preferred policy summary table, as well as the policy unit map, to reflect more clearly the likelihood that infrastructure at Yelland would be protected as part of any MR implementation along this longer stretch.</p> <p>(5) MR here was appraised but felt to be less viable due to the small amount of potential gain for the cost likely to be incurred in realigning the defence and Tarka Trail in this area. It should also be noted that the defence of the trail is not a key policy driver for the SMP, taking the South West Coast Path policy to realign and work with nature as much as possible. We have however split this unit into 2 parts to reflect potential for MR along part of the frontage such that it could be considered at a later date.</p> <p>(6) We have reviewed this unit 7c22 and amended wording and MR line shown on map following receipt of new data in this area.</p> <p>(7) We will review information and possibly amend. Policy suggests investigating in detail the possibility for realignment and only to implement if appropriate to do so. Having reviewed the text we have amended the text to make it clear that these issues need to be addressed by more detailed study.</p> <p>(8) Lines shown are purely indicative to give an idea of what the policy could mean and are stated as being indicative and subject to more detailed study. We have amended the lines to ensure that they do indicate the need for 'joining up' realigned positions.</p>

Comments from?	Comments	Action/Response
	<p>(8) 7c25 The mapped options for re-alignment make no sense with the topography. Historic mapping of Braunton Burrows prior to Crow Point developing does not show a regression this far. Whilst realignment should tie into and be mutually dependant on the Horsey Island option, the cartography needs to be improved.</p> <p>(9) 7c26 - This area is part of an SAC and is in unfavourable condition due to the coastal management at the moment. The short term policy is worded more like a hold the line, which is not acceptable under the habitats regulations for this section. I would suggest a wording of carry out further investigations for the restoration of favourable status of this stretch with a view to re-alignment by removal or relocation of the current defence. Any references to secondary defence lines should be removed.</p>	<p>(9) We have revised the text to make it clear what is intended in this area and that future management is dependent on more detailed study in the short term. We have reviewed the text in the implications table to ensure specific reference is made to the policy at 7c26 (and the uncertainty associated with it).</p>
Natural England	<p>(1) 7c09-26. Within the Taw/Torridge estuary itself, the policy of holding the line to protect development will, in combination with sea level rise, result in coastal squeeze and potentially a reduction in the intertidal area. Loss of intertidal habitat will result in the SSSI becoming unfavourable, but we hope this could be offset by managed realignment to create intertidal habitat in other parts of the estuary.</p> <p>(2) 7c26 (Crow Point). On the northern side of the estuary mouth, inappropriate rock armour at Crow Point has caused a unit of Braunton Burrows to be in unfavourable condition. At this location, however, the SMP2 policy is managed realignment (if further studies show that the feature isn't important for protecting the inner estuary). If managed realignment is implemented, then the unit should return to favourable condition status.</p>	<p>(1) We have reviewed the text in implications table to ensure this is clear.</p> <p>(2) We have reviewed the text in the implications table to ensure specific reference is made to the policy at 7c26 (and the uncertainty associated with it).</p>
Environment Agency	<p>7c09 – 15 Check hatching on maps relevant to Unesco Biosphere. There are 3 levels, not 1 area as indicated.</p> <p>All the defences for urban areas will need to be improved, not just Northam and Bideford. Appledore defences are below current required standards for new developments and parts of East-the-Water have a 20 year standard of protection.</p> <p>Along with any improvement of defences, opportunities to move developments at risk or not suitable should be explored. For example, create green spaces in flood risk areas (behind defences) and move development to green fields sites not at flood risk.</p> <p>At some locations there is currently no, or very little, room for new defences.</p>	<p>The 3 levels of the biosphere reserve are shown plotted on the mapping in Appendix D. However, to reduce the number of layers on the policy unit maps, the 3 levels are presented as one single layer representing the overall influence of the biosphere designation.</p> <p>Having reviewed the text, the need for improving the defences at Appledore is already stated in the short term. We have added mention of East-the-Water to this also.</p> <p>We have added mention of possibility of considering land use adaptation to help reduce flood risk.</p>
Environment Agency	<p>7c11 - 14 From the medium term, defences will have to be raised. However, there are existing problems with minor watercourses that run down (behind) to the defences that get tide locked. This will need to be sorted and functional areas (green spaces) will need to be increased.</p>	<p>This is something that would need to be considered at scheme level. We have however added mention of this issue to the policy statement.</p>
Environment Agency	<p>7c16 With the Managed Realignment options the length of defences is increasing and hence maintenance costs. Parts of the Tarka Trail, seaward of the defences, could be used as the defence line but allowing flood water to pass into land behind.</p> <p>The Tarka Trail should also be considered as a future transport link (rail/bus).</p>	<p>We have added mention of possible options for Tarka Trail where policy is MR to the policy statement.</p> <p>We are unaware of any definitive plans of this nature that are likely to be forthcoming so it would be inappropriate to make a policy decision on the basis that a development may occur in the future if there is no firm evidence to support it.</p>
Environment Agency	<p>7c17 The tidal defence in Fremington will also have to be improved.</p>	<p>We have split Fremington out as its own unit to make it clearer what is intended in this area.</p>
Environment Agency	<p>7c19 The proposed policy is Hold The Line, however, the wording and map need to indicate an opportunity for Regulated Tidal Exchange (Managed Realignment) north of Bickington.</p> <p>Opportunities for Managed Realignment do exist, in small pockets (e.g. Lake) and land swaps would also help. This can happen with Hold The Line options.</p> <p>Page 85 – Kenwith valley is mentioned in the 'implications' table.</p>	<p>MR here was appraised but felt to be less viable due to the small amount of potential gain for the cost likely to be incurred in realigning the defence and Tarka Trail in this area. It should also be noted that the defence of the trail is not a key policy driver for the SMP, taking the South West Coast Path policy to realign and work with nature as much as possible. We have, however, split this unit into 2 parts to make it clear where MR may be feasible in the future and where it will not.</p> <p>We have reviewed the implications table and these details have already been picked up. No further action required.</p>
Environment Agency	<p>7c20 This is generally Hold The Line, with perhaps small Managed Realignment to help with fluvial issues. The standard of protection is currently low and needs to be improved.</p> <p>Bishops Tawton needs to be protected, as well as the railway.</p>	<p>Having reviewed the text we feel it is clear that property and infrastructure is to be protected under the plan, recognising in this unit that more detailed study is required.</p>

Comments from?	Comments	Action/Response
Environment Agency	7c23 Text needs to reflect the importance of the 'Great Field' historic field system.	We have clarified in the text that this historic asset would need to be considered in more detailed studies looking at how and where MR may be implemented.
Environment Agency	7c25 Clarification needed as to why Hold The Line, following Managed Realignment, is the preferred policy in the long term.	HTL following MR as MR is more likely to involve construction of a new defence line in a sustainable position with a long defence life, rather than repeatedly building new defences in ever more retreated locations (i.e. realign once to a long term position). We have added comment about realigning to long term sustainable positions that can be maintained to the text.
Environment Agency	7c25 – 26 The maps for these units are very difficult to read. Page 86 – if the private defences are not maintained housing may be affected as well.	We will consider ways to improve the mapping. Refer also to 'mapping' comments in Section 3. We will review the text on page 86 and consider amendments to reflect this comment,
Christie Farms	I write on behalf of my Clients, the Trustees of the Christie Estates in relation to the above matter <i>[Consultation Deadline – Friday 8th January 2010].</i> I would point out that my Clients were at no stage furnished with plans, despite owning an extensive stretch of the North Devon Coastline at Saunton Sands, Braunton Burrows and Yelland/Instow. In view of this, there has been no opportunity to examine the documentation. Following a meeting with representatives of the Environment Agency and Natural England, my Clients wish to express their total opposition to the plans as formulated regarding the southern part of Braunton Burrows. You are hereby notified that the Consultation Deadline and the fact that my Clients were not consulted at any stage, results in any future report being anything but representative of the views of affected parties. The proposal of the Environment Agency with regards to the future loss to the sea of land which has been in the ownership of my Clients for in excess of four hundred years will be resisted and ridiculed in the public domain. It is the total antithesis to the outlook of experts in the past, who whilst being criticised by members of the Environment Agency today have by contrast an outstanding legacy by virtue of the fact that the said area has not been foregone, and wide-scale flooding averted. The Christie Estates will not work in conjunction with the Environment Agency or any other department that is intent on curtailing maintenance that can prevent land of high conservation value being lost irretrievably to the sea.	Christie Farms have been on the stakeholder list from the outset of the SMP and has received all correspondence, including that about the consultation. The initial stakeholder questionnaire was received back from Christie Estates in 2008, confirming that they would like to be kept informed of SMP progress – refer to Appendix B.

Braunton Burrows and Saunton Down – 7c27 and 7c28

Comments from?	Comments	Action/Response
Resident of Bideford	The policy of no active intervention for Braunton Burrows is bound to be controversial. I feel inclined to accept the SMP on this but I note that the Burrows themselves need more active management than they are presently receiving. Grazing and active management of scrub will be important to sustain open sand to allow the dune complex to respond to changes in the fore-dunes along the coastal strip. I appreciate that such management is not a responsibility of the Environment Agency and will need to be worked out in conjunction with the Christie estate and other stakeholders. It just seems wrong to advocate/allow dynamic re-alignment along the coast yet permit vegetation succession which will ossify existing topography inland.	We note the comment, but as stated this type of management is not strictly a coastal defence issue. However, the SMP policy would not prevent proactive management of the dunes if was to be undertaken and funded by others (i.e. not from flood and coastal defence budget). We have clarified the reason for the NAI policy in the text but noted that dune management may need to be considered in the future, to be based on ongoing monitoring.
North Devon AONB	(1) 7c27 Braunton Burrows Whilst we would support the general policy of no active intervention along this stretch of coastline, the potential threat to the tourist facilities here are a major issue that needs to be considered. This is a major tourist attraction in the summer and there could be considerable pressure to relocate if it were lost, which could be a major landscape issue for the designated North Devon AONB (2) 7c28 Saunton Down Whilst we agree in principle to the policy of non-intervention, we would query the predictions for coastal erosion as outlined on the map from Chesil Cliff to Downend. The geology at this location would indicate fairly soft glacial drift deposits on top of older harder rocks. These glacial deposits have been fairly susceptible to erosion and over the past 25 years, and we have witnessed the South West Coast Path being eroded. Sections have cliff have retreated inland by as much as 15 metres in places, over that time period due to the effects of coastal erosion.	(1) The policy allows for continued defence of the facilities here if funds are available, but there is insufficient justification to use public (flood and coastal defence budget for this). If defences are not maintained then adaptation measures will need to be investigated to manage the future risk. This would be undertaken following the SMP and requires no action at this stage in terms of SMP policy. We have, however, amended the implications tables to reflect the importance of this are in terms of tourism and the potential impact of the policy upon this. (2) and (3) In developing the baseline understanding there was very little information available on rates of cliff retreat for much of this coastline. We have sought and considered the additional information mentioned in this comment and it has been determined that the long term policy does not need to be changed, although further detail on implications of the policy for transport infrastructure has been added.

Comments from?	Comments	Action/Response
	(3) A further rise in sea level, and extreme weather conditions associated with climate change could mean further loss of ground here and within the next 100 years. Therefore, consideration may need to be given to protect the main Saunton to Croyde road. We would therefore suggest that the long term policy needs to be re-assessed, if this vital road becomes threatened.	
North Devon Council	7c27 - Only purple erosion line shown?? 7c28 - Only purple erosion line shown?? Difference in line thickness	This is because the lines for each epoch are the same (i.e. the erosion prediction is the same in all three epochs). We have added text to section 5.2 of the main document to explain this.
North Devon's Biosphere Reserve	Broad agreement with the policy. 7c28, the cliff has receded by 15 m in the last 10 years. In 100 years the cliff will not be far from the road. The text should reflect this risk.	In conjunction with the comment from North Devon AONB, we will have reviewed the additional information in this area and determined that no change in policy is needed. We have added details of this to Appendix C also.
Environment Agency	7c27 - 28 There are no properties at risk from flooding in this unit, only erosion. However, beach facilities are at risk of flooding. Any new defences must be funded by developer.	We have reviewed and amended the policy statement to make sure that it is clear and addresses this comment.

Saunton Down to Morte Point – 7c29 to 7c36

Comments from?	Comments	Action/Response
North Devon AONB	(1) 7c30 Middleborough Hill – We note that this policy is a deviation from the original Shoreline Management Plan, but would agree in principle with the policy of non-intervention here as much of the coastline is SSSI. However, we believe the policy in the long term should be re-assessed if the road/public footpath out to Baggy Point becomes threatened.	We have added comment to the implications table about the possible loss of road/footpath if private funds are not available to defend in the future. To set a policy to defend a footpath would also be inconsistent with the policy of the South West Coast Path.
North Devon Council	The SMP2 does not go into much detail regarding policy for existing private sea defences. For example, Policy Unit 7c30 Croyde Bay North. The general Policy is for No Active Intervention. There are lengths of private sea defences in front of the existing properties, continued protection of these locations is unlikely to be detrimental to the long term plan for this coastline. If these defences are retained or even uprated as part of new development would this be against the general policy? Do we need to state that in areas of existing defences, development will be decided locally, as situations will vary around the coast? It may be more economical for a developer to improve a defence rather than let it fall into repair, possibly putting other properties at risk. It may be more useful to provide a form of Managed Realignment rather than No Active Intervention. Erosion/Flood Risk should be re-assessed by a developer in all locations as part of any proposed development. The data is only indicative and local conditions will vary. (1) 7c29 - See comments at beginning of e-mail (2) Policy Unit 7c30 Croyde Bay North. The general Policy is for No Active Intervention. There are lengths of private sea defences in front of the existing properties, continued protection of these locations is unlikely to be detrimental to the long term plan for this coastline. If these defences are retained or even uprated as part of new development would this be against the general policy? Do we need to state that in areas of existing defences, development will be decided locally, as situations will vary around the coast? It may be more economical for a developer to improve a defence rather than let it fall into repair, possibly putting other properties at risk. It may be more useful to provide a form of Managed Realignment rather than No Active Intervention. Erosion/Flood Risk should be re-assessed by a developer in all locations as part of any proposed development. The data is only indicative and local conditions will vary. (3) 7c30 - As above. 50-100yr erosion line not likely. The predicted erosion, without defences, for this length is very low due primarily to the presence of the rock platform, acting as a buffer to wave energies. 7c31 - No comment 7c32 - No comment 7c33 - See comments at beginning of e-mail [NB: refer to 7c29 comment above] 7c34 - No comment (4) 7c35 - I think this would be better as 'Hold the Line' in front of the car park. Losing the car park would put the coastal road at risk.	The policy statements do refer to private defences and provides advice on whether or not they should be allowed to be retained (subject to private funds being available) and the likely impact of defences remaining in terms of coastal processes. Any additional works would remain subject to the landowner applying for permission from the local planning authority to undertake works at their own cost. They would have to demonstrate that such work would not have an adverse affect on adjacent lengths of estuary or coast. We have reviewed text in the main document and sought to clarify this further in text at the start of Section 5. (2) The policy statements do refer to private defences and provides advice on whether or not they should be allowed to be retained (subject to private funds being available) and the likely impact of defences remaining in terms of coastal processes. The policy states that introduction of shoreline control structures such as groynes would not be acceptable. Any additional works would remain subject to the landowner applying for permission from the local planning authority to undertake works at their own cost. They would have to demonstrate that such work would not have an adverse affect on adjacent lengths of estuary or coast. We have clarified in the text that improvements could occur if private funds are available and assuming defences continue to be similar to those currently in place. (3) Having reviewed the mapping this 50-100 year line has been found to be plotted in error. It has been corrected in all revised mapping. Our assessments have not changed based on this revision. (4), (5) We have added mention of the possible need to locally defend infrastructure if it can not be relocated or alternatives provided in land. However, based upon the information available we do not believe it to be sufficient to justify a change in policy to HTL.

Comments from?	Comments	Action/Response
	(5) 7c36 - There are areas of erosion that threaten the road 'The Esplanade'. Works may be required to protect the highway.	
North Devon's Biosphere Reserve	(1) Croyde Bay Agree with the policies. (2) Woolacombe Bay Agree with the policies. (3) In SEA impacts table, short term human health and property: It might be worth adding "The natural life expectancy private coastal defence and Puttsbrough will not be compromised by the policy" (4) In the biodiversity and Fauna section (and the geology section) I suggest acknowledging the (partial) dune loss at Woolacombe with sea level rise.	(3) We will review and amend the implications table as appropriate. Agree, and we have amended the text accordingly (4) Consider adding 'potential frontal dune erosion' to the table.
Environment Agency	7c29 - 31 In the medium term, even with maintenance, the flood/erosion risks will increase.	We have reviewed the policy statement to make sure that it addresses this comment.
Environment Agency	7c30 There is pressure for development in this unit. In the long term erosion will cause the loss of housing and holiday businesses, which will need to retreat into the AONB (but the SSSI will increase). Opportunities for retreat must be explored. If private defences are not all upgraded, gaps/holes will form and weaken the whole system and impact on neighbours.	The local plan does not state this area as being one for development focus. If development is to occur in this area it will have to take account of SMP policy. We have clarified the text in this area as to what would be expected if defence here is continued.
Environment Agency	7c35 Medium term: consider Managed Realignment. Long term: consider Managed Realignment. Risk of erosion will mean the loss of tourist interests in the bay. Managed Realignment may be necessary for these assets, i.e. they move landward and get repositioned with no defences being built.	The relocation of assets landwards with no defences being built would be an adaptation measure and could occur under the policy of NAI. We have amended the policy statement and implications table to ensure this is clear. A policy of MR would indicate an intent to manage the frontage for a defence function and this would not be consistent with what is intended in this area.

Morte Point to Minehead (West) – 7d01 to 7d18

Comments from?	Comments	Action/Response
Resident of Porlock	This is a heritage coast and most of it lies within a National Park. The shore of the vale of Porlock is an SSSI and county geological site, while other areas adjoining the coast are candidate special areas of conservation (Exmoor Heaths and Oakwoods), section 3 woodland, section 3 cliffs and foreshore and county wildlife and geological sites. Natural evolution is therefore the requisite policy. In practice, given the inaccessibility of much of the coast (the highest sea cliffs in England), this is the only sensible policy anyway.	Comments noted. No action required.
Lynnton & Lynmouth Town Council	To 2025: agree in principal. To 2055 (and 2105): Postulating the 'keep the line' will be sufficient in 70 years is dangerous. Lynmouth Harbour and the eastern beach are already threatened by sea level variance of the Bristol Channel. In the presence of SW winds wave height can exceed the height of the Rhenish Tower and the beach has already suffered erosion. The esplanade defences are cracking and show signs of lack of repair and particularly of maintenance. Should climate change impact on the Bristol Estuary levels Hold the Line will fail.	Hold the Line policy states the intent to continue to protect Lynmouth from flood risk. How this is delivered in the face of future sea level rise would be investigated in more detailed studies, but as commented, it is likely to require further investment and larger defences in the future, should sea levels rise as currently expected. Based on our assessments we do not believe the policy of HTL is incorrect. No further action required.
Residents of Porlock Weir	This will affect our business – hotel/holiday lets – loss of our land and grazing and safe access to beach as well as increased risk of flooding due to no intervention.	The appraisal of options has considered these implications, in conjunction with the economic cost to the nation, and impacts on the landscape, natural environment and historic environment. We therefore feel that based on balancing the various interests along this section of coast, that the preferred policy is the most appropriate. We have, however, ensured that the concerns raised are reflected fully in the implications tables.
Landowner, Hele	No active intervention will cause more erosion of our cliff top caravan site. We have already lost three pitches through landslip and need to stop cliff erosion from further encroachment.	Based upon the appraisal of options, and considering all factors, we do not believe there to be sufficient justification to intervene in this area and so the policy has remained as it was in SMP1. We have, however, ensured that the concerns mentioned are reflected fully in the implications tables.
Porlock Manor Estate	I. INTRODUCTION I.1 Porlock Weir forms part of a largely natural coastal system; systems change; this is a very dynamic system.	2.2 - We acknowledge the need for additional study in this area and we have included this recommendation in the Action Plan.

Comments from?	Comments	Action/Response
	<p>1.2 There has been a natural harbour at Porlock Weir for centuries in its present location. In geomorphic and anthropomorphic terms it is not unlikely that there was even an earlier harbour still, dating from near the end of the last ice age 8000-6000 years BC. Archaeologists still may find evidence that may tend to support that, a little out to sea from the present location.</p> <p>2. RECENT HISTORY</p> <p>2.1 Evidence was presented to the House of Commons Agriculture Committee by Mark Blathwayt, Planet Practice, on behalf of the Porlock Manor Estate which was published in 1998.(Sixth Report; Flood and Coastal Defence; Volume 2)</p> <p>2.2 Included in this evidence was the repetition of the call, earlier made by Professor John Pethick, for there to be a proper funded new study into sediment supply from the west; this has still not been made. Instead the literature review simply repeated the earlier omissions in the science.</p> <p>2.3 Following damage caused by a high spring tide in February 1990, increased by coincident low atmospheric pressure, it was necessary, completely, to replace the timber harbour mouth groyne. The Porlock Manor Estate was not content to replace the groyne in the previous 'right angled' form proposed by the Local Authority, which in the view of the Estate, would have perpetuated unwanted interruption of shingle flow and long shore drift.</p> <p>2.4 Instead, to promote a more sustainable easier flow of shingle past the harbour mouth, the Estate itself built a "buzzard's beak" shaped groyne to replace it, much more aligned to the east. It works much better. Shingle is no longer trapped at Porlock Weir as it may have been to some extent before.</p> <p>3. PRESENT ISSUES</p> <p>3.1 When the 1990 groyne is itself replaced, which will be needed within 5 years, the Estate's expert advice is that the "hook" of the buzzard's beak shape should be made more pronounced and the length of the groyne itself be reduced.</p> <p>3.2 It is over a century since the present lock gate arrangements at Porlock Weir were installed, in 1887; following which a new status of equilibrium in coastal processes has become established between shingle movement and shingle deposition; as managed, all shingle reaching the harbour mouth groyne now passes past Porlock Weir towards the storm beach.</p> <p>3.3 To the east, the shingle storm beach is established in a steady state of change; it is the natural pattern of storm beaches to be overtopped; some 'rolling back' is always part of the geomorphology of a storm beach; in other places there is steady seaward accretion.</p> <p>3.4 The "new gap" in the storm beach, to the West of "New Works" in Porlock Bay, is highly dynamic; large volumes of shingle from Porlock Weir reach the gap; are pushed into the gap; and then washed out to sea; before being pushed back again towards the storm beach. Most of the pushed back shingle comes back to the west of the gap again, either as pebble or eroded as sand; only a small proportion works eastwards, meaning that, east of the gap, the shingle ridge is thinning as long shore drift removes material without yet being replaced; eventually a steady state of change will establish and there will be reached an equilibrium where most shingle reaching the gap passes by the gap.(as it already does at the entrance to the harbour at Porlock Weir)</p> <p>3.5 It is a point of agreement, that at some stage in the future, perhaps in several thousand years, the continuity of shingle flow may lead to the gap re closing, re-establishing a storm beach pattern in which the storm beach is regularly overtopped but seldom breached.</p> <p>3.6 Examination of lacustrine deposits on Porlock Marsh confirms that this process of inundation and sea flooding and creation of coastal grazing marsh has been episodic and continuous in pattern.</p> <p>3.7 What was very damaging to local systems was ill advised attempts to tamper with the profile of the ridge to prevent over topping; overtopping is an essential part of the natural geomorphology of a storm beach.</p> <p>4. IMMEDIATE FUTURE</p> <p>4.1 Porlock Weir, as a settlement for fishing and as a base for trade and exploration, has seen many changes in the last 6000years. Natural changes will continue. Man made systems and structures will continue to need to adjust to these changes.</p> <p>4.2 The emergency sewage outfall, that serves all of West Porlock as well as Porlock Weir, still functions as essential maintenance infrastructure and will continue to affect wider management options at Porlock Weir.</p> <p>4.3 Tidal ranges in the Bristol Channel, including Porlock Weir, are the highest in Europe and the second highest in the world. Such conditions make scientific, valid or useful comparisons with the east coast of</p>	<p>2.3, 2.4, 3.1 - We are grateful for this additional information provided on the defences and we will have ensured that this is reflected in the Appendix C of the SMP document.</p> <p>3.4, 3.5 – In Appendix C of the SMP we have considered the latest data on how the shingle ridge is behaving and the uncertainties associated with its future evolution, including whether the breach will close, or will actually remain open due to a tidal inlet forming.</p> <p>4 and 5 – These useful comments are duly noted and we have revisited the policy appraisal, in respect of these comments.</p> <p>4.2 – Wessex Water who are responsible for this sewage outfall are aware of the SMP policies and have been engaged through discussion and consultation to fully understand the implications for their assets.</p> <p>4.5 – see responses to 6.3, 7 below.</p> <p>5.1 – working with natural processes in a sustainable way is very much a principle of the SMP approach.</p> <p>5.4 – the SMP has based sea level rise estimates on the current Defra guidance, which results in an estimated 1m rise in sea levels over 100 years.</p> <p>6.3, 7 – We fully agree that the future approach to managing this shoreline needs to be flexible and promote adaptation. This is currently recognised in the statement, but further recommendations for a study to look into suitable measures have been included in the Action Plan for the SMP.</p> <p>Based on the appraisals made we do not believe it would be appropriate for Porlock Weir to be a focus of further development given the risks to this area from further coastal change and the need, if maintained, for much larger defences here to be required that would have much more significant impacts on processes and landscape character and also be unlikely to be justifiable in terms of a robust economic case for seeking funds from flood and coastal defence budget.</p> <p>We do, however, acknowledge that future defence here will be dependent on provision of private funding as has occurred in the past from Porlock Manor Estate, and following further review, we have reflected these points more clearly in the policy statement. The policy has also been amended to be NAI but allowing defence of Porlock Weir if other (non flood and coastal defence budget) funds are available. This is then consistent with other areas of the SMP where defences are privately owned.</p> <p>6.4 It is not within the remit of the SMP to comment on the location of power stations.</p> <p>8.2 The SMP development for this shoreline started in 2008 and therefore has been running for under 2 years, although it is recognised that studies in the areas predate this. In developing the draft policies, we have consulted with the client group, which includes representatives from the LA, EA, Natural England, key stakeholders and elected members (as representatives of the wider community).</p>

Comments from?	Comments	Action/Response
	<p>England, or even Burnham-on-Sea further up the Bristol Channel, difficult.</p> <p>4.4 Porlock Weir is backed by high ground and adaptive changes to roads buildings and infrastructure are sustainable and feasible.</p> <p>4.5 The reasons put forward in the consultation documentation and elsewhere for discontinuing maintenance at Porlock Weir after 2025 do not stand proper analysis or scrutiny in physical, economic or geographical terms. Indeed, the administrative position seems clearly inconsistent and less than completely rational.</p> <p>5. DATA, PRESENT POLICIES AND PRACTICE.</p> <p>5.1 The Porlock Manor Estate continues to advocate working with natural processes. This sustainable 'local' approach has brought great benefits at low cost.</p> <p>5.2 The Local Authority and the Environment Agency have not had to do much, if any, physical work in the last fourteen years; scientific monitoring and recording by independent scientific specialists continues to be important.</p> <p>5.3 According to credible scientific sources available to all, sea level rise in the next 100 years will be in excess of 1.4 metres. Based on other available evidence, the Porlock Manor Estate is inclined to plan on the basis that this figure of 1.4 metres sea level rise seems likely to be a truer more realistic forecast than other lower estimates; accordingly all Estate planning is made on this basis.</p> <p>5.4 The Government approved DEFRA figure, is lower, at a mere 0.54 metres sea level rise; it has been adopted by the Environment Agency; it may not be so helpful in providing proper "long term" cost effective solutions and answers to problems.</p> <p>5.5 Storm Beaches and natural shingle banks are naturally adaptive; they become higher with sea level rise. Sediment supply from cliff falls and, landslides increase as higher tide levels cut back the protection to the bases of cliffs. Increased frequency of flash flood events increases the measurable amount of river sediment pebbles and boulders input into coastal systems.</p> <p>6. LESSONS THAT INFORM</p> <p>6.1 If it is true to say that Porlock Bay, its Porlock Storm Beaches and Marshes have been used, to the benefit of the United Kingdom as a whole, as a useful "guinea pig" to demonstrate the human and physical interactions involved in such concepts as "managed retreat", then there may be further useful lessons to be learnt.</p> <p>6.2 Re-location of coastal footpaths; impacts of radical change or destruction of breeding habitats for rare birds; changes promoting "replacement" habitat to compensate for the environmental impact of, for example, impounding Cardiff Bay or creating new port facilities at Bristol.</p> <p>6.3 These lessons must include assiduous exploration of how compensating alternative sustainable housing and business premises can be created inland on higher ground. This too is a national priority, with implications across the United Kingdom.</p> <p>6.4 It demands a return to the question whether power stations should, whenever possible, and whatever power source, be located so as to be used as "foci" for development with the huge quantities of very hot cooling water produced being used to provide, in district heating schemes, integrated combined heat and power for universities, hospitals, industrial estates and whole residential areas at very much lower costs, achievable with less waste in transmission losses and greater energy efficiency. Is not this better than adding to the measurable environmental damage caused by injecting huge quantities of very hot water into the sea?</p> <p>6.5 Most leading scientists agree that if rising atmospheric temperature is a problem, the damage done to ecosystems affecting micro plankton fish and birds by higher sea temperatures is many times more severe.</p> <p>7. RECOMMENDATIONS</p> <p>7.1 In Harbour and building terms, there are at Porlock Weir and elsewhere, imminent changes which can be successfully met with existing building technology; architectural skill adapting existing buildings to the new conditions, affording new uses, modifying existing structures, including sewage systems, and harbour structures and roadways to suit new environments sustainably.</p> <p>7.2 Porlock Weir is a sustainable community. The balance of homes and businesses play an important part in the 'industry of regional tourism' in the Exmoor National Park.</p> <p>7.3 All sustainable communities require room to expand to meet local residential and employment needs and those of migrants.</p> <p>7.4 Porlock Weir is very well placed indeed to develop to maintain this sustainability in line with long term</p>	

Comments from?	Comments	Action/Response
	<p>management systems that have evolved to meet need for well over 300years of family ownership, matching visual beauty with economic dynamism.</p> <p>7.5 “New Build” sites for homes and businesses exist already and have been identified; current immediate need can be met successfully in landscape and land use terms in line with a continuous Estate Policy; this is a policy of evolution in harmony with the landscape itself and listening to the needs of all the people who are needed to make a thriving community.</p> <p>7.6 In view of these benefits, the cost to the nation, of continuing to provide some level of funding to conserve and adapt Porlock Weir is small.</p> <p>8. OBSERVATION</p> <p>8.1 If the assumptions and policy decisions proposed in this consultation were applied elsewhere in the European Union, the results would include the virtual disappearance of the Netherlands. Both the Netherlands and Porlock and other coastal Communities will be better served by a grassroots approach informed by the very best accurate science. Local communities can then form a balanced view about what is best and achievable by them and what is unrealistic.</p> <p>8.2 Local Communities should have been involved much earlier in this process, not merely “consulted” some “four or five years down the line; consulted virtually at the end”</p> <p>8.3 Grassroots, “bottom up” looking at the issues would generate, more quickly much more realistic useful, fertile, practical, productive partners for scientific and environmental specialists.</p> <p>9 RECAPITULATION</p> <p>9.1 It is hoped that this response to the consultation on the Draft Shoreline Management Plan may prove useful and relevant to Porlock Weir and helpful, if possible, to the wider community and for the common good of the country.</p> <p>9.2 The response has sought to be focussed, so as:</p> <ul style="list-style-type: none"> • to be placed in a present relevant context (heading 2); • to examine present issues (heading 3); • to view the immediate future (heading 4) • to examine the proper applicability of data, policies and practice (heading 5) • to look at where lessons are there to be learnt (heading 6) • to make recommendations (heading 7) • to make observations that may help future consultation. (heading 8) <p>It is hoped that this response is helpful to the seeking of excellence in science and common sense in making decisions that involve all local people affected.</p>	
Somerset County Council	<p>Porlock Weir, within policy unit 7d16, will clearly be affected by the policy to hold the line during the short term, to maintain the existing defences for as long as technically possible during the short term and into the medium term, and that future replacement of defences is unlikely to attract public funds from the flood and coastal defence budget. It is intended to allow time for ways of adapting to flood risk to be developed and implemented. It is felt this will require further in depth consultation with the community of Porlock Weir and additional resources allocated to helping these communities adapt to the changes predicted. We hope that this work will be led by the Environment Agency in partnership with stakeholders including the National Trust, Exmoor National Park, West Somerset Council, Somerset County Council, Porlock Parish Council and Porlock Manor Estate.</p> <p>The approach adopted by the Slapton Line Partnership http://www.slaptonline.org/ which exists to support the community as it adapts to live and work with the changing coast, including the temporary and eventual permanent loss of the coast road, may be a good model to adopt for this work.</p>	<p>We agree that there needs to be full engagement with the local community and that this should form part of the development of adaptation measures. We have included this recommendation in the policy statement and action plan.</p> <p>NB: Having undertaken further review of the data, and bearing in mind the comments received on the draft policy, the policy for Porlock Weir has been changed as follows. The defences here are privately owned and the owner has indicated intent to maintain (and possibly improve) the existing defences. To be consistent with other areas where defences are privately owned, the policy should be changed to ‘No Active Intervention’ for all three epochs but with the clear statement that maintenance of private defences could continue if desired so long as they are about the same extent and they can be demonstrated to not have an adverse effect on the rest of Porlock Bay. Such a condition would also apply to any plans to construct larger defences over a larger extent in the medium to long term, something that would be required in order to provide adequate defence of this area. However, the SMP should retain the assessment that in the medium to long term construction of larger defences is not thought to be appropriate and so consideration may need to be given to adaptation measures in this area in the long term.</p>
North Devon AONB	<p>(1) In principle we would agree with the policy of no active intervention along the undeveloped coastline here and the policy of hold the line at the key settlements such as Lee, Ilfracombe; Watermouth and Combe Martin. However:</p> <p>(2) 7d03 the Shoreline Management Plan appears to be at odds, in that it is advocating a hold the line policy at Lee Bay but it acknowledges there may be insufficient funds to maintain the existing sea defences. We believe that the policy here should be made clearer as this could have an affect on what public funds were made available for sea defence.</p>	<p>(2) There are two places called Lee Bay along this section of coast. We have amended the text to clarify which one is subject to availability of private funding.</p> <p>(3) Having reviewed further the information for Watermouth Slipway, the policy here is changed to NAI but with a note that if private funds are available, then defence could continue here. There is unlikely to be sufficient justification for use of public (flood and coastal defence budget) funds to achieve this.</p>

Comments from?	Comments	Action/Response
	(3) 7d08 Watermouth Slipway: There would appear to be insufficient detail in the plan to inform clear decision making as to what is to be defended in Watermouth Harbour. It seems clear that the sea defences connected to the harbour facilities and slipway will be defended and even improved. However, there is insufficient detail regarding the mixed structures and river bridge supporting the public footpath (Berryarbor 2a) to the east of the harbour. These structures are in a poor state of repair and have attracted little public funding in the past and little responsibility for maintenance by the local authorities unless linked to the management of the public right of way. Therefore, clarification is sought as to what should be defended within this policy unit.	
North Devon Council	7d01 - No comment 7d02 - No comment 7d03 - No comment 7d04 - No comment 7d05 - No comment 7d06 - No comment 7d07 - No comment 7d08 - No comment 7d09 - No comment 7d10 - No comment 7d11 - No comment 7d12 -No comment 7d13 - No comment 7d14 - No comment	Noted. No action required.
North Devon's Biosphere Reserve	(1) Agree with the policies. (2) 7d08; the policy unit needs to be better defined. The slipway and harbour walls should also include the bridge at the eastern end. This should be reflected on the map.	(2) Having reviewed further the information for Watermouth Slipway, the policy here is changed to NAI but with a note that if private funds are available, then defence could continue here. There is unlikely to be sufficient justification for use of public (flood and coastal defence budget) funds to achieve this.
Natural England	7d16 (Porlock Weir). We ask that a sustainable solution using natural flood defences and attenuation measures is agreed as soon as possible in the Short-term Epoch.	Agreed – the Action Plan highlights the need for detailed study to investigate options and adaptation measures needed. NB: Having undertaken further review of the data, and bearing in mind the comments received on the draft policy, the policy for Porlock Weir has been changed as follows. The defences here are privately owned and the owner has indicated intent to maintain (and possibly improve) the existing defences. To be consistent with other areas where defences are privately owned, the policy should be changed to 'No Active Intervention' for all three epochs but with the clear statement that maintenance of private defences could continue if desired so long as they are about the same extent and they can be demonstrated to not have an adverse effect on the rest of Porlock Bay. Such a condition would also apply to any plans to construct larger defences over a larger extent in the medium to long term, something that would be required in order to provide adequate defence of this area. However, the SMP should retain the assessment that in the medium to long term construction of larger defences is not thought to be appropriate and so consideration may need to be given to adaptation measures in this area in the long term.
Environment Agency	7d01-13 It is not just properties at risk in these units but also a major road link.	We have reviewed the policy statements and implications tables to ensure this comment is adequately reflected.
Environment Agency	7d06 Medium term: consider Managed Realignment. Long term: consider Managed Realignment. It would be cheaper and more sustainable to move the road inland than to Hold The Line.	Due to the steep rising ground and lack of alternative inland routes, we do not believe it would be practical or cost-effective to move the road compared to continuing to protect it along its current route. It should also be noted that Devon County Council have advised that there are no plans to improve the A399 in their long-term plan at the present time. We have therefore not made any changes to the policy in this area.
Environment Agency	7d08 Medium term: consider Managed Realignment. Long term: consider Managed Realignment. What is being protected, as there are no properties? The slipway will need to be redesigned (for sea level rise), however, tourist assets can be moved further from the coast at owners expense, not utilising public	Having reviewed further the information for Watermouth Slipway, the policy here is changed to NAI but with a note that if private funds are available, then defence could continue here. There is unlikely to be sufficient justification for use of public (flood and coastal defence budget) funds to achieve this.

Comments from?	Comments	Action/Response
	<p>funds.</p> <p>Page 124 – there is no residential property at risk at Watermouth Cove, just the yacht club and holiday park.</p>	
Environment Agency	<p>7d14 - 17 Preferred policies to implement Plan: 'Monitoring is recommended to record and observe this change'. Change to 'Continued monitoring...' to reflect work already being undertaken, for example, Regional Coastal Monitoring Programme.</p>	We have amended the text as suggested.
Environment Agency	<p>7d15 SMP1 policy was to observe and monitor. What were the results of monitoring and conclusions drawn from the monitoring to help inform policies eastwards?</p>	<p>SMP1 recommended detailed study of the whole system in Porlock Bay. It is our understanding that this has not been undertaken.</p> <p>However, a Defra/EA R&D report "Porlock Bay: Geomorphological Investigation and Monitoring Gravel Barrier Breaching and Tidal Lagoon Development" was completed in 2005. This included assessment of processes within the whole of Porlock Bay but detailed focus was on the breach formation and development. This work has been used in our baseline processes assessment (Appendix C) and has informed policy development.</p>
Environment Agency	<p>7d16 Medium term: consider Hold The Line.</p> <p>The Porlock defences are stated as being the sea wall and harbour arm, which do not attract public funding and are not maintained by the Environment Agency at present. The SMP1 policy was to Hold The Line and the SMP2 draft policy is to Hold The Line for the first epoch, then No Active Intervention for the remaining epochs. The decision to not allow the structures to be maintained and thus protect Porlock Weir is based on the possibility that the defences would not attract public funding and that the defences 'would impact on the wider coastline of Porlock Bay'.</p> <p>The headland at The Gore and the shingle at Porlock Weir may eventually change shape in the future but maintaining the defences will not affect the sediment transport along this section of coast and No Active Intervention would not release additional sediment into the system. How will maintenance of defences impact on Porlock Bay and are there studies to support this?</p> <p>The No Active Intervention policy does give the opportunity to allow the coastline to revert to a more natural state and reintroduce lost habitats, however, there is limited land behind these defences where habitat gains can be made.</p> <p>If the policy was to continue to hold the key structures the future of the village could be safeguarded for more than the first epoch (continuing to reassess in line with sea level rise rates etc). Any upgrading of the defences would still need to go through the appropriate routes and would need to be assessed for impact prior to consent and planning permission.</p> <p>A policy of No Active Intervention could prevent private funding for the continued protection of Porlock Weir. Sea level rise and deterioration of the defences (if funding cannot be provided) will eventually mean that the village will have to relocate. However, currently it should still be viable, in terms of the tourist economy etc, to maintain the defences into the long term as more is understood about the coastal processes of this area and more accurate sea level rise figures are calculated.</p> <p>Change policy map to better represent preferred policies in text, currently Hold The Line and moving to No Active Intervention in the medium term.</p>	<p>Based on the appraisals made using the latest information available, we do not believe it would be appropriate for Porlock Weir to be a focus of further development given the risks to this area from further coastal change and the need, if maintained, for much larger defences here to be required that would have much more significant impacts on processes and landscape character.</p> <p>We have however reviewed this area further in light of all comments received and consider that continued defence could occur here so long as it continues to have limited impact on sediment transport. We do not, however, believe a robust economic case for flood and coastal defence budget funding could be made to provide adequate levels of protection to Porlock Weir in the long term. Continued defence here will therefore depend on the availability of other funds. As such, and for consistency with other areas, the policy for Porlock Weir has been changed to NAI for all three epochs, but with clear statements that continued defence could occur if (non FCD budget) funds are available.</p> <p>Assessments have been based on information available but further information has been provided by Porlock Manor Estate and we have considered this as part of this review.</p> <p>As part of this review we have also revised the erosion map data that was found to be in error.</p>
Environment Agency	<p>7d17 Has the risk of flooding and erosion to the old landfill site been sufficiently considered, along with the potential impacts?</p>	We have reviewed the assessments made and implications table to ensure that this issue is adequately addressed. The risk to the landfill site is also understood to be being considered as part of an ongoing adaptation study in this area.

Minehead to Blue Anchor – 7d19 to 7d23

Comments from?	Comments	Action/Response
Resident of Minehead	I agree with the policies but would like to comment on recent activity at Warren Point (7d20). These comments are on a short note, attached to this document. I am preparing a publication describing the	We appreciate the additional information provided and as appropriate have incorporated these comments into Appendix C. We also note the concern regarding extraction of aggregate, although the SMP cannot address

Comments from?	Comments	Action/Response
	<p>catastrophic deposits at Minehead.</p> <p>NB: REFER TO GEOLOGICAL SUMMARY PROVIDED, KEY POINTS FROM WHICH ARE:</p> <ul style="list-style-type: none"> • There are two boulder ridges extending from mid-tide to low spring tide from the beach north of Butlins holiday centre. They separate Minehead Bay from Madbrain Sands. The more northerly parts are wet and show up black, the southerly parts have dried along the ridge crests and are light coloured. Similar features occur towards Blue Anchor and possibly near Minehead Harbour. Similar boulder deposits occur also in Porlock Bay and at Lynmouth but these lack the linearity of the Minehead features. • The morphology of the Minehead ridges indicates that they were deposited in two stream channels cut in coastal deposits that have since been removed by erosion and shoreline retreat during the past few thousand years. The distal ends of the ridges seem to split and resemble distributary channels. At the proximal ends, near the beach, the more easterly ridge seems to overly its neighbour to the west, suggesting that it is younger, filling a channel cut by a stream after its original channel had been blacked by the boulders deposited in its original channel to the west. I have found no evidence to show how far the boulder deposits extend onshore beneath the beach and other younger covering deposits. • Several large borrow pits were dug in 2009 on the eastern side of the easternmost Minehead boulder ridge providing aggregate to protect the golf course. This is most unfortunate and should not be allowed to happen again for two reasons; <ul style="list-style-type: none"> 1 The boulder ridges provide significant protection to Warren Point foreshore from long-period westerly swell and storm waves. If they are destroyed by abstraction then the erosion of Warren Point will accelerate. The protection afforded by the boulder ridges almost certainly accounts for the survival of the land that makes up Warren Point and its golf course. 2 The Minehead Boulder ridges and the others nearby are, as far as I am aware, geologically unique and deserve immediate protection as a SSSI. They will provide an invaluable and accessible teaching resource to students interested in catastrophic deposits. <p>ANY OTHER COMMENTS: I am a retired petroleum geologist, formerly with BP Exploration</p>	<p>this issue.</p>
<p>Local Resident</p>	<p>(1) Having recently attended a meeting at the Minehead Golf Club concerning the SMP, we should like to register our total disagreement with the medium to long term proposals, which appear to be an ill-considered and unnecessary expensive answer to a possible sea level rise. Also, on your pamphlet, it mentions that this stretch of coast "would be unlikely to attract public funds", so who will pay for the new and very expensive sea wall?</p> <p>(2) For our own part, as property owners and land owners in the SMP area, we notice that no mention has been given to the fact that we are guardians for a Grade 2* ancient 14th century Manor House clearly marked on the plan but without the necessary listed building circle. We are therefore totally incensed that so little thought is being given to England's Heritage, and we are in close contact with English heritage themselves (at the highest level), which is duty bound to protect such valuable buildings. Although the proposed sea wall re-alignment is between the Manor and the sea, it has been pointed out that a probable rise in water table height, along with river and drainage backups during high tide, could result in large parts of the Dunster Marsh becoming uninhabitable.</p>	<p>(1) In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p> <p>(2) We are aware of data issues regarding the Historic Environment and have amended the maps and tables accordingly. We also have been in consultation with English Heritage throughout the SMP. We also note your concerns with regard to the water table. This is an issue that would be in detailed investigations, but this potential impact will be added to the implication tables.</p>
<p>West Somerset Golf Club</p>	<p>(1) Your plans were short on detail. Lack of even an attempt on costings was crucial.</p> <p>(2) Also lack of any idea where the new defences would be sited.</p> <p>(3) Lack of accurate details on how much the water levels have risen during the past 10 years—are sea levels rising? You should have comparative figures for the Bristol Channel over the past 25 years.</p> <p>(4) It is helpful to you will continue to maintain the shingle ridge in the short term.</p>	<p>(1) The SMP does include broad scale costings in Appendix H, in line with the guidance provided by Defra. Consideration of more detailed costings prepared in 2009 by others has also been made in developing policy options.</p> <p>(2) The SMP does not define exactly where a realigned defence position will go, but does consider possible locations. The precise realigned position would be determined by more detailed investigation prior to any implementation following on from, but guided by the policy of, the SMP.</p> <p>(3) In response to this comment, we have undertaken some research and included text in the Appendix C Section 3 which indicates that SLR is happening, and with that in the Bristol Channel.</p>
<p>Dunster Beach Holidays Ltd</p>	<p>Once again, I have to refer back to our previous feedback forms. We do not feel in any situation, especially after having spent many hundreds of thousands of pounds of our shareholders money on providing coastal protection along the front of Dunster Beach that a managed re-alignment program is at all acceptable or viable. What we have done to date is already protecting, not only ourselves, but the golf course, sewerage works and</p>	<p>In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the</p>

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	<p>ultimately Minehead from the risk of flooding “through the back door.” If the sea were to breach at this point, it would enter the waterways at a point that could not be protected by a “realigned defence.” Therefore, I propose that we hold further discussions on how to implement and fund further sustainable protection to bolster what we have already achieved.</p>	<p>existing line is likely to become unfeasible in the future.</p>
<p>Resident of Minehead</p>	<p>I have already written to you about the need to preserve the boulder ridges that extend northwards from Butlins beach both as an amenity and to help protect the nearby coast from storm damage, and was pleased that the same point was made by Dunster Beach representatives, both at the meeting and in the description of the sea defences they have undertaken.</p> <p>The British Geological Survey's report on the Minehead area, written by R A Edwards and published by the Stationery Office in 1999, describes the 1:50,000 geological sheet 278 and part of sheet 279. The map, updated most recently during the 1970's shows a storm beach extending continuously from the beach off Minehead Railway Station to Dunster Beach. Edwards comments on p.107 that "the distribution of gravel around the old and new groynes in this area indicates active transport of the gravel eastwards." From a coastal protection point of view this is all that needs to be known. I agree with the Somerset CC representative that the £100,000 to be spent on "a consultant" would be far better spent on removing the offending groyne and devising other means of helping Nature maintain the coast.</p> <p>For example, it was drawn to my attention after the meeting that the appearance of storm beach gravel migrating east and forming a spit at the entrance to Minehead harbour may be a fairly recent (<15 years?) phenomenon - presumably because the enormous concrete groyne jutting northwards from the bend in the harbour wall is now being overtopped. The huge reserve of gravel and boulders to the west of it is now full. That material should have been distributed along the entire storm beach from Minehead to Dunster Beach. Much of the post-medieval erosion of the coast may be attributed to the barrier created when the harbour, and subsequently the groyne, was built. The dammed-up gravels are beautifully displayed on the Google Earth image of the harbour. Now that the dam is full and the gravel has started moving again there are two choices.</p> <ol style="list-style-type: none"> 1. Continue the costly fight against natural processes by dredging the gravels and dumping them on the foreshore where they are immobilised and play no further role, as is the case at present. I assume that the dredged gravels are not dumped in the obvious place near high tide beyond the Golf Club groyne because of the cost or difficulty of transportation and not through lack of thought. 2. Let the harbour spit grow eastwards to form a new coastal feature, possibly hastened by removing most of the big concrete groyne mentioned above. This new feature would probably need some reinforcing but might, in a few years, greatly increase the size and usefulness of Minehead harbour. The new gravel spit might eventually close off Minehead Bay (cf. Porlock) and shut the harbour but not for many years. Such growth is possible because there are fortunately no artificial obstructions to the supply of new material from the cliffs of North Hill to the west. Alternatively, when the spit has reached a position far enough east to give room behind it for a large marina and other recreational facilities, the excess gravel could then be trucked at low tide across a managed harbour entrance economically to Warren Point. <p>I recommend that the second possibility be given earnest consideration. It may seem irrelevant to the Dunster Beach issue but I don't think so. Their sea defence works have shown that that coast can be protected and even enhanced without major (i.e. concrete) engineering works. All they need to do now is plant <i>Spartina</i> grass on the sandy parts to reduce wind and people erosion. The Golf Club should take a leaf out of their book - but without damaging the boulder ridge (see Google Earth) any more in doing so!</p> <p>I have a geological map of the foreshore which identifies secondary issues, mostly to do with recent compaction induced subsidence (see for example the "folding" of the peat beds where the submerged forest outcrops) and can supply this if needed.</p>	<p>The SMP is a high level document and options suggested could be considered at strategy and scheme level.</p> <p>These have been considered in the development of the action plan.</p>
<p>Local Resident</p>	<p>I am writing to support the comments made separately by Dunster Beach Holidays Ltd and endorse their suggestions with regard to the possibility of 'back door' flooding of Minehead. They have done Minehead a great service in the short term by defending Dunster Beach from destruction. I believe your final plan should adopt and, when necessary, continue their coastal protection work.</p> <p>Our shoreline continues to be degraded by poorly managed small engineering works, such as the continued dumping of gravel and sand from Minehead harbour in silly places. The gravel is rendered immobile by dumping it at half tide line; it should be moving along the beach to maintain the natural protection afforded by the</p>	<p>(1) The SMP objective is to consider sustainable methods for managing the coast in the future, given our current understanding of sea level rise and the increased pressure this will place on existing shoreline defences. The risk of 'back door' flooding is recognised in the SMP, but there are various options to address this risk.</p> <p>(2) The comment is noted, but maintenance dredging of the harbour is not covered by flood and coastal defences. We do note, the comment regarding the potential use of this material. This would need, however, to be supported by further more detailed study to appraise potential impacts.</p>

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	storm beach. This can happen at little cost if the gravel is taken to high tide line and the useless carboniferous limestone groynes removed. The sand is dumped at the entrance to the harbour where small tidal counter current and local wave refraction ensures that it goes straight back into the harbour. Such repetitive engineering costs could be greatly reduced by effective management.	
Residents, Dunster	<p>It would make sense to us that every effort should be made to protect the current shoreline in the first instance. This of course cannot be left entirely to the Dunster Beach and Golf course authorities, but must receive Government assistance, both for ideas and funding. Both the Dunster Chalets and the golf course provide excellent facilities and bring <u>substantial income to the Town of Minehead and also to Dunster village and the castle</u> and therefore must be protected.</p> <p>We see no problem in thinking about a second line of defence, at which the railway embankment would seem to be the place, should the first line of defence be breached and this could follow at a slightly later date.</p> <p>Holding the first line of defence will save the Golf course, the Holiday chalets with its nature reserve, Lower Manor farm and its farmland, the old Manor house and of course, all the valuable farmland between Dunster Beach and Blue Anchor.</p> <p>Something would have to be done to prevent seawater going back up the river overflow channel to the east of the beach, passing under the railway and into the river and fields beyond eventually reaching the Castle grounds. It is assumed that the present back flow measures for the river which exits near the end of the Chalets will still be suitable.</p>	<p>In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p> <p>The SMP objective is to consider sustainable methods for managing the coast in the future, given our current understanding of sea level rise and the increased pressure this will place on existing shoreline defences.</p> <p>This would be something that needs to be considered in detailed investigations. We have, however, mentioned that issues of land drainage would need to be considered in the policy statement.</p>
Resident, Dunster	<p>(1) the lifeblood of the economy of the region depends on the tourist industry. The chalet complex and adjacent area plays a key role in generating significant tourist numbers to the area.</p> <p>(2) Water ingress from the moors and hills would cause additional hinterland flooding if the coastline is relocated inland.</p> <p>(3) There would be a significant loss of agriculture land by a realignment as proposed in the medium and long term.</p> <p>(4) Dunster beach is a nature reserve and an important environmental asset.</p> <p>(5) The economics of realignment for phases in the medium and long term would mitigate against allowing the sea to take over.</p> <p>(6) Holding the line is the best option.</p>	<p>Many of the points mentioned have been considered in policy development to date.</p> <p>In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p>
Resident, Dunster	I feel it would be a great loss to this area if every effort were not made to protect Blue Anchor and Dunster beaches. The current defences should be improved to ensure their future.	In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.
Local resident	<p>The existing defences from Minehead to Blue Anchor should be strengthened to ensure that this area is permanently protected.</p> <p>With all the new technology, which has been used for the building of an island city at Dubai, surely this should not be impossible.</p> <p>Apart from Brean, Dunster is the only safe beach which people can drive onto and spend great family days. There are excellent facilities i.e. toilets, shop and snack bar. This brings lots of trade and revenue to the area from holiday makers and locals alike.</p> <p>No only would people be affected but also the well-established wildlife.</p>	<p>Based on our appraisals we do not believe that armouring the coast along this entire frontage is the right option and that the long term position should be a realigned one.</p> <p>We note however, the points raised about the importance of the beach as a tourist destination and will ensure this is emphasised within the document. The SMP has to, however, consider the long term sustainability of continuing to defence along this shoreline, both in terms of people, continued investment, and impacts on the natural environment. Whilst engineering solutions are available, the cost of these must be justified and also the long term impacts also need to be considered, including the increased exposure of the coast as sea level rises, which would potentially result in the loss of the beach.</p> <p>In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p>
Residents, Minehead	We are bringing up a young family in what to us was an idyllic situation here on the Warren. Now we are in doubt as to whether we have a future here at all. We are fortunate enough to live in a lovely part of the	No funding was put in place post scheme. All funding is allocated on a cost benefit basis. We do not store money post project.

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	<p>country lets do our best to see that it stays that way.</p> <p>Why wasn't the work done when funding was in place? Surely the experts knew that stopping the defences where they are was going to cause problems in the future, of course they did, that's why the money was there to carry on with the maintenance programme so who made the decision to stop and why?</p>	
Resident, Minehead	<p>I am writing to express my grave concern about the proposed SMP, which affects the West Somerset Golf Course and the four dwellings which abut it, including my bungalow in The Warren.</p> <p>I feel that if the current defences are not managed and maintained and an alternative sea defence is built behind my property there will be sever potential danger of backdoor flooding. I wholeheartedly support the submissions sent to you by Dunster Beach Holidays Ltd and urge you to reconsider your plans and 'hold the line'.</p>	<p>The purpose of the set back defence line will be to reduce risk of backdoor flooding to the wider Minehead area. Exactly where that line will go would be determined by more detailed study and the line shown on the map is only indicative to give an idea of what the policy option here could mean (to aid visualisation/understanding of potential implications).</p> <p>In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p>
Blue Anchor Hotel	<p>I mainly agree with the proposals because of the suggested amount to be spent on Blue Anchor Sea Wall. When we tried to do the work we had funds available, however since then trade has suffered for many reasons; weather, not being able to make full use of our garden and the trend in trade across the country.</p>	<p>Comments note. No action required.</p>
Old Cleeve Parish Council	<p>If the predicted rises to sea level take place it will be very costly, if not impossible to prevent the same processes at Blue Anchor as happened at Porlock Marsh. Therefore we support your plan at paragraph 7 for our parish.</p> <p>NB: (1) The Blue Anchor Road should be protected as the alternative road if the A39 is blocked by road accidents. (2) The established settlements should be protected. (3) The main sewer at Dunster should be protected or moved.</p>	<p>We have reviewed the text to ensure concerns listed here are addressed adequately in policy statement/implications tables.</p>
West Somerset Railway	<p>Following summarises key points from letter submitted:</p> <p>It is entirely conceivable that over the timescale of the SMP the line will function increasingly as an important transport link. If protection of the line is not maintained future reinstatement or realignment of the track bed following storm or flood damage would be prohibitively expensive.</p> <p>We would urge that the historic significance of the railway and probable increased importance to the local population of the line as a transport link is highlighted in the Plan. This would ensure that due regard is taken when the relevant authorities make use of its recommendations in determining what, when and where future protection works are carried out.</p> <p>In the section 7d19 to 7d23, the suggested line for coastal realignment does protect the railway track bed and earthworks and is acceptable to WSR. At the eastern end where the defence line is adjacent to the railway recommendations should state that form and method of construction of any defence works need to ensure that the track bed is not damaged.</p> <p>Presumably where the River Avill flood relief channel passes under the railway and out onto the beach measures would be needed to prevent storm surges penetrating behind the defences.</p> <p>Within the table of implications we propose that the railway is referred to under 'Architectural and Archaeological Heritage'.</p>	<p>We have reviewed and revised the text as appropriate to ensure points made here are reflected in the policy statement and implications tables. We have also clarified the need to work with the railway line and not adversely impact on it. It will be up to more detailed study to establish how this could occur. This has been taken forward as an item in the Action Plan.</p> <p>Review implications and ensure railway is mentioned appropriately.</p>
Residents, Minehead	<p>We are both local with my husband coming from Minehead and myself originally from Dunster.</p> <p>Having seen for ourselves the devastation caused along the seafront by the huge tidal storms back in the late 80s we applauded the renewal work to the seawall and thought a marvellous job had been done. Little did we realise the impact that it was to have a few years down the line.</p> <p>We were told that money was in place at that time to carry out the defence work further along past the Warren but this never happened and the money has long since been used up.</p> <p>The last groyne that was put in place at the end of the Warren is causing much of the problem with the washing out of the shingle ridge, had the work to maintaining the shingle ridge been implemented at that time it is unlikely that the position now would be such as it is.</p>	<p>No funding was put in place post scheme. All funding is allocated on a cost benefit basis. We do not store money post project.</p> <p>The aim of the SMP is to propose solutions that will be sustainable in the future, given the increased pressure on our shorelines that is likely to result from rising sea levels.</p> <p>The realignment positions shown are indicative and subject to much more detailed study, but all aim to protect much of the Minehead area against future flood risk, including Butlins.</p> <p>In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect</p>

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	<p>We live on the Warren and I would say these problems have put us in an untenable position, having invested in the property as our pension fund.</p> <p>Behind us is Somerset World. Whilst I have no idea of the sort of money that they command their value to the town must be immense.</p> <p>Then there is Dunster Beach which may not be much in your eyes, but again brings a lot of revenue in to the area and house a bird and wildlife sanctuary.</p> <p>We certainly must not forget the golf club with its hundreds of members and the not insubstantial monies this brings to the town.</p> <p>The cost of losing all of this must surely by far outweigh the cost of maintaining a shingle ridge and securing the future of generations to come.</p>	<p>Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p>
<p>Minehead and West Somerset Golf Club</p>	<p>We strongly believe that Minehead and West Somerset Golf Club is very much worth preserving and protecting for the future, both for the commercial benefit to the local community as well as the golfing community in general. Our response supports and adopts the thoughts and observations of Dunster Beach Holidays Ltd. This is to adopt the 'Hold the Line' option.</p> <p>The following is a summary of the key points from a very detailed response:</p> <p>The golf course was formed in 1882 and is a links course offering important golfing experience to the local community and golfers from all over the world. It is therefore an important economic asset in West Somerset.</p> <p>It is suggested that there are several important aspects which have either not been considered or not been fully considered for their full impact on the proposals being made that were discussed at the meeting held in our club house. These are:</p> <ol style="list-style-type: none"> 1 The significant impact of water coming from the moors and hills down the River Avill that even now causes significant flooding and that will be exacerbated if the coastline is moved in land. 2 The fact that the Severn has the second highest tide range in the world and therefore any risk of flooding only occurs occasionally, then even if there is an increase in the sea levels, there will only be an increase in overtopping on the very highest of tides and possibly dependent on the direction of the wind at such time. 3 Scientists are suggesting that sea level rise will increase flood risk most on the east coast of England and that effects on the Bristol Channel will be significantly less. In that situation a 'hold the line policy' is most appropriate at this time. 4 The existing problem at Warren Point has arisen as a result of the inappropriate length of the groyne erected at the Golf Course end of Minehead. 5 As a country we cannot afford to lose land not only for commercial or housing use but also for agricultural uses. 6 It is essential that in areas where land can be saved (such as in this area) that should occur. <p>The reports prepared make it clear that there is a major concern regarding the flooding of East Minehead if the golf course and the Dunster Beach chalet land is breached. That will be inevitable unless the hold the line policy in the present coast line position is adopted. Such flooding would have an impact upon the houses at the rear of Dunster Beach, the sewage works, the railway line and quite probably Butlins.</p> <p>It is necessary to consider the various options and in this respect it is noted that the original draft proposal suggested 'holding the line' up to the Avill relief channel. It is also necessary to consider the various options considered in the last Black & Veatch report.</p> <p>It is the opinion of the golf club that the maintenance of the existing defences is the most appropriate and preferable option.</p> <p>If one holds the line as in option 5 of the Black & Veatch report then all land will be protected and there will be no commercial or human loss, certainly not for the next 50 years or more. However adopting the 'realignment' option and doing nothing to protect land in front of the proposed embankment the following consequence will arise:</p>	<p>In light of comments received and further review, the policy here has been modified to be 'Hold the Line' in the immediate term through beach recycling/short timber groynes (at Dunster) and replacement of embankment (at golf course), whilst undertaking a strategy study to look at the bigger picture, including potential issues with the terminal groyne at Minehead. Construction of a secondary defence line (seaward of West Somerset Railway) as back up to the beach will still be required under this policy as it is uncertain that the standard of protection beach management along the Dunster frontage alone will be adequate to reduce risk of backdoor flooding to Minehead. The revised policy statement text also clarifies issues needing to be addressed by detailed study in the short term, such as point 1 in these comments.</p> <p>In the medium term 'Hold the Line' would continue for as long as technically and economically sustainable through continuing beach management, but this may well become unsustainable in this period, at which time the policy would move to 'Managed Realignment'. At this point the secondary defence line constructed in the short term would become the primary defence line. Limited beach management to control roll back/minimise breach risk in this period could also be considered under this policy.</p> <p>The long term policy will be similar to the medium term, reflecting uncertainty on the timing of the change to the realignment policy. Ultimately the long-term vision of the Plan for this area is to provide flood defence in a realigned position. If realignment occurs in the medium term, then the policy in the long term would be to maintain the realigned defence position under Hold the Line. If realignment did not occur in the medium term then it will be likely to occur in the long-term.</p>

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	<ul style="list-style-type: none"> • The golf course will be lost. • The chalets at Dunster Beach will be lost and could not be relocated. • There would therefore be significant loss of revenue from loss of council tax and income tax. • A small business at Dunster Beach will need to be relocated. • Important environmental features, including the freshwater lake known as The Hawn will be lost. • The lower land behind the gold course and chalets will be lost and this includes a farm and valuable agricultural land. • The risk of flooding to the east of Minehead would increase, as this may be caused by flooding behind the embankment then a Grade I manor house, the sewage works and possibly Butlins will be at risk. 	
<p>Minehead & West Somerset Golf Course</p>	<p>Until the last work carried out approximately 12 months ago the undermined material had always been pushed back into place, appropriately as this section is considered to be the backdoor defence to Minehead. This would leave an angle from the beach line up to extend the life of the defences.</p> <p>However, the latest work, with no shoring up, left a vertical drop which is eroding rapidly. I understand it is now the policy of the Environment Agency NOT to retrieve the undermined shingle which means that the existing defence now has an extremely short life expectancy.</p> <p>I understand that monies were set aside as part of the Minehead scheme to pump in correctly sized shingle material along the length of the golf course to address the undermining effect that the engineers knew would be caused beyond the position of the last groyne. It was anticipated that this would dissipate the wave action potentially building the shoreline as was historically the case.</p> <p>I appreciate and understand the need to defend Minehead with an artificial beach and improved defences but I feel that NOT to retain and attempt to recreate a naturally building defence as was planned with the last works in the mid 90s is morally wrong. It is the building of the artificially created defence that is creating the problems with the erosion and this needs to be looked into much further.</p>	<p>No funding was put in place post scheme. All funding is allocated on a cost benefit basis. We do not store money post project.</p>
<p>Dunster Beach Holidays Ltd</p>	<p>The following is a summary of the key points from a very detailed response:</p> <p>DBH recognised the problems caused by overtopping when there were high tides and erosion caused by the strength of the waves and started a process of coast protection some 20 years ago (NB: full details of works has been provided).</p> <p>It is acknowledged in the report from Black & Veatch that the work has been “reasonable effective in maintaining a stable profile along the upper foreshore”. These works have protected the land owned by DBH but also third party land to the rear.</p> <p>The works were carried out to build up the foreshore, both to stop overtopping and to reduce the strength of the waves. The next phase will be to introduce more groynes and ‘infilling’ in front of the present groynes and this gain more land.</p> <p>With reference to the Black and Veatch report executive summary, “the recommendation is to continue to maintain the defences to ensure that the defence standards are retained through a programme of upgrading works, probably to be enhanced by erosion control measures *to be investigated at project level”).</p> <p>The plan is concerned about the protection of Minehead and the risk of backdoor flooding. It is the opinion of DBH that to provide such protection it is necessary to continue the work they have been carrying out, with an increase in the height of the bank along their property and much of the golf course.</p> <p>The present proposal to realign and create a new defence line approximately along the line of the railway would be very expensive, would result in significant loss of valuable land used for tourism residential and agricultural purposes and land which consists of environmentally important habitats.</p> <p>The proposal seems to have no regard for the assessments carried out in the Minehead to Blue Anchor Technical Review or the comments of the Black and Veatch Report. Of great significance is the fact that the proposal seems to provide no evidence of an assessment or reason why those conclusions are incorrect or misinformed. Thus for this reason in addition to the other matters the proposal plan is fundamentally flawed.</p>	<p>In light of comments received and further review, the policy here has been modified to be ‘Hold the Line’ in the immediate term through beach recycling/short timber groynes (at Dunster) and replacement of embankment (at golf course), whilst undertaking a strategy study to look at the bigger picture, including potential issues with the terminal groyne at Minehead. Construction of a secondary defence line (seaward of West Somerset Railway) as back up to the beach will still be required under this policy as it is uncertain that the standard of protection beach management along the Dunster frontage alone will be adequate to reduce risk of backdoor flooding to Minehead.</p> <p>In the medium term ‘Hold the Line’ would continue for as long as technically and economically sustainable through continuing beach management, but this may well become unsustainable in this period, at which time the policy would move to ‘Managed Realignment’. At this point the secondary defence line constructed in the short term would become the primary defence line. Limited beach management to control roll back/minimise breach risk in this period could also be considered under this policy.</p> <p>The long term policy will be similar to the medium term, reflecting uncertainty on the timing of the change to the realignment policy. Ultimately the long-term vision of the Plan for this area is to provide flood defence in a realigned position. If realignment occurs in the medium term, then the policy in the long term would be to maintain the realigned defence position under Hold the Line. If realignment did not occur in the medium term then it will be likely to occur in the long-term.</p> <p>Refer also to response to the Environment Agency’s comments below.</p>

Comments from?	Comments	Action/Response
	<p>Option 5 of the Black and Veatch report can be phased in as and when needed.</p> <p>DBH therefore would wish the proposal to be amended to Hold the Line from Minehead to the Avill Relief Channel, with appropriate coast protection work.</p> <p>It is suggested that there are several important aspects which have either not been considered or not been fully considered for their full impact on the proposals being made that were discussed at the meeting held in our club house. These are:</p> <ol style="list-style-type: none"> 1 The significant impact of water coming from the moors and hills down the River Avill that even now causes significant flooding and that will be exacerbated if the coastline is moved in land. 2 The fact that the Severn has the second highest tide range in the world and therefore any risk of flooding only occurs occasionally, then even if there is an increase in the sea levels, there will only be an increase in overtopping on the very highest of tides and possibly dependent on the direction of the wind at such time. 3 Scientists are suggesting that sea level rise will increase flood risk most on the east coast of England and that effects on the Bristol Channel will be significantly less. In that situation a 'hold the line policy' is most appropriate at this time. 4 The existing problem at Warren Point has arisen as a result of the inappropriate length of the groyne erected at the Golf Course end of Minehead. 5 As a country we cannot afford to lose land not only for commercial or housing use but also for agricultural uses. 6 It is essential that in areas where land can be saved (such as in this area) that should occur. <p>The reports prepared make it clear that there is a major concern regarding the flooding of East Minehead if the golf course and the Dunster Beach chalet land is breached. That will be inevitable unless the hold the line policy in the present coast line position is adopted. Such flooding would have an impact upon the houses at the rear of Dunster Beach, the sewage works, the railway line and quite probably Butlins.</p> <p>It is necessary to consider the various options and in this respect it is noted that the original draft proposal suggested 'holding the line' up to the Avill relief channel. It is also necessary to consider the various options considered in the last Black & Veatch report.</p> <p>It is the opinion of the golf club that the maintenance of the existing defences is the most appropriate and preferable option.</p> <p>If one holds the line as in option 5 of the Black & Veatch report then all land will be protected and there will be no commercial or human loss, certainly not for the next 50 years or more. However adopting the 'realignment' option and doing nothing to protect land in front of the proposed embankment the following consequence will arise:</p> <ul style="list-style-type: none"> • The golf course will be lost. • The chalets at Dunster Beach will be lost and could not be relocated. • There would therefore be significant loss of revenue from loss of council tax and income tax. • A small business at Dunster Beach will need to be relocated. • Important environmental features, including the freshwater lake known as The Hawn will be lost. • The lower land behind the golf course and chalets will be lost and this includes a farm and valuable agricultural land. • The risk of flooding to the east of Minehead would increase, as this may be caused by flooding behind the embankment then a Grade I manor house, the sewage works and possibly Butlins will be at risk. 	
Somerset County Council	<p>Following the public meeting hosted by Minehead Golf Club and Chaired by Dunster Beach Holidays Ltd on 7th December 2009, to discuss the policy options affecting Dunster Beach and Minehead Golf Club, there appears to be merit in further exploring the possibility of changing the policy for units 7d21 and 7d22, from Managed Realignment in the short and medium term to Hold the line. There is a strong case to be made for this change, given the large number of properties, businesses and individuals which are dependant on the coastal</p>	<p>In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p>

Comments from?	Comments	Action/Response
	<p>defences along this section of coast. Information provided by Dunster Beach Holidays Ltd. at the above meeting indicates that continuing to extend the work of groyne installation, is likely to be favourable in terms of the cost-benefit analysis of the businesses, properties and individuals this will be helping to protect.</p>	
<p>Resident, Minehead</p>	<p>I attended the meeting on 7th December at Minehead, Golf Club and as a Shareholder Chalet Owner and Director of Dunster Beach, wish to put forward my views on your considered re-alignment of Dunster Beach Coastal Defences.</p> <p>My Chalet 166 is sited 5th from the end of the beach at the Golf Course end and apart from the great loss to me and others of this County Wildlife Site, there is the financial loss to me of a chalet valued at £105,000 and as there are 230 chalets on a site valued at £24,150,000.</p> <p>What is so distressing is that so much good work has been carried out by us over the last twenty years, when a process of coastal protection was effectively started, this has been so successful that there are now sand dunes being created and the whole area in addition to the resident birds has a wide range of visiting birds, some very rare ones.</p> <p>The loss of such a significant amenity to the large numbers of visitors who stay and also day visitors to the beach will have a substantial effect upon the economic viability of the whole area.</p> <p>Although Minehead is a very popular holiday venue Dunster Beach is well known all over the country and abroad for its unique qualities. The input from us has generated tourism for Minehead and Exmoor and surrounding areas, over the past forty years. We need to continue the Shoreline Scheme so successfully carried out to date at Dunster Beach here and also towards Minehead and Blue Anchor.</p> <p>At the meeting it was stated that the groynes built on the Minehead Seafront have a significant adverse effect upon the bank, which protects the Golf Course. Having been a member of the Archaeology Group of the U3A for some time for which the Convenor was the late Michael Ireland. These groynes were discussed at some length at a recent field meeting and he stated then that they had been wrongly aligned, surely these should be replaced correctly now, not wait until more of the land is lost.</p> <p>I welcome some hope from you that Dunster Beach and the Minehead Golf Course can be saved from this coastal defence re-alignment scheme.</p>	<p>In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p> <p>Point about looking at realigning groynes has been included as a point for further study in Action Plan.</p>
<p>Residents, Dunster</p>	<p>Further to a meeting at the Golf Club in Minehead regarding the above, we oppose the set back defence and support maintaining the existing sea defence for the following reasons:</p> <p>We farm Lower Marsh Farm, Dunster, Minehead, if the set back defence was implemented we would lose a large proportion of our farm, with the possibility of making the farm unviable.</p> <p>We produce approximately 1.3 million litres of milk per annum, along with 200 tonnes of grain, 50 lambs and 50 beef animals.</p> <p>As a business, we employ 2 full time and 4 part time staff.</p> <p>Increasing world population and climate change increases the demand for food and the removal of good agricultural land is detrimental to this food production, especially British food production.</p> <p>The proposed route for the set back sea defence goes over areas of land which are up to 5 metres below the existing sea defence wall. This means that the new wall would have to be over 5 metres high before it even gets to the same height as the existing sea defence. This would be incredibly expensive and would have a large environmental impact due to the large volumes of stone being required to build the wall.</p> <p>Currently where the river enters the sea there is a non return gate, this gate shuts when the tide is high, and this lead to the River Avil backing up and overflowing causing flooding. If the non return gate was moved further back in land, flooding would still occur. However, this flooding would most probably effect the sewage</p>	<p>In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p> <p>Current guidance does not steer policy to defend areas on the basis of food production value alone. This is a point for national debate and beyond the SMP remit at the current time to address. However, we have added this as an item to take forward in the Action Plan.</p>

Comments from?	Comments	Action/Response
	<p>treatment works and other low lying areas of Minehead. Dunster Beach Holidays Ltd have demonstrated how the existing sea defence can be maintained by the works they have carried out, and therefore I feel that maintaining the existing sea defences would be the best possible outcome.</p> <p>I hope you will take our views into consideration and await further correspondence in relation to this matter.</p>	<p>These are points to consider in more detailed study. We have added mention to the policy statement that issues pertaining to the River Avill should form part of a detailed study in the short term.</p>
Trustees of the Luttrell Trust	<p>We disagree with the proposed policies for unit 7d20 and specifically the policies referring to The Warren and Golf Course. The short and medium term policy of managed realignment and the long term policy of holding the line at set back defences are all considered to be unacceptable and we would request that the SMP is changed to offer protection to this part of the coastline. If the SMP was followed and no adequate protection or plan put forward there would be land lost and a severe risk of flooding to the area caused by an unprotected shoreline.</p> <p>We would echo the comments that you have received from Minehead and West Somerset Golf Club and Dunster Beach Ltd. The golf course is highly regarded and rather than undeveloped farmland is an example of developed land which should not be allowed to be lost or flooded. It is an important amenity not only for locals but also attracts visitors to the area and it would not be feasible to relocate such a feature. Not taking in to account the golf course there would be risk to other adjoining and local properties including residential property, wildlife sites and those at Dunster Beach.</p> <p>We understand from the advice you have received for Dunster Beach Ltd that they have (privately) successfully managed the coastline with groynes and that this sort of approach could be applied to protect the land here.</p> <p>We would again request the SMP is changed to offer protection to this important part of the coastline and that the option of Hold the Line is implemented. This is the only way to ensure that a significant and valuable piece of land is not lost forever to the sea.</p>	<p>In light of comments received and further review, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p>
Environment Agency	<p>7d19 The down-drift effect of the Minehead defences needs to be investigated and considered further.</p>	<p>We agree and have added detail to the policy statement in this regard.</p>
Environment Agency	<p>7d20 Medium term: consider Hold The Line.</p> <p>Long term: consider Managed Realignment.</p> <p>The coastal processes are fast acting along this stretch of coastline. Erosion rates are rapid, as can be seen by the shingle ridge. Black & Veatch suggest that, based on these rates, emergency works will be required again within 5 years.</p> <p>It is important that we are consistent in our approach to the whole flood cell (as indicated in the Black & Veatch report 2009, which includes Dunster Beach). Therefore, what we put in policy at one location should be matched at the other.</p> <p>How long does the Black & Veatch report give the current line of defence?</p> <p>Will Managed Realignment result in habitat gain and if so, what type of habitat?</p>	<p>The SMP has considered the Black & Veatch (2009) report in developing the recommended preferred option, including the assessment of erosion pressures, flood risk to Minehead and the economics.</p> <p>We have also considered the broad level principles of SMP2 guidance to ensure that options are sustainable in the long-term, do not commit future generations to unnecessary expenditure and consider the process interactions with adjacent coasts. In appraising possible policy options, we consider technical/economic viability/sustainability, and impacts on a whole range of features including natural environment, historic features, landscape, agricultural land</p> <p>Regarding the Black & Veatch (2009) report economic assessment, we acknowledge that hold the line by increasing the height of embankments is most economically viable, and options to address the ongoing erosion pressure by building larger groynes and introducing beach recharge are also viable. However, the economics also identify managed realignment options as also being economically viable.</p> <p>It should be noted that the Black & Veatch (2009) economics "assumed that the recharge material required can be locally sourced from the shingle beds, accreting close to the low water line slightly eastwards towards Dunster, or from materials accumulating on the shingle beach at Culver Cliff due to coastal undercutting of the cliff. As a result, material costs have been omitted and haulage costs have been kept to a minimum in the total PV costs of the option". Considering the process interactions and ongoing erosion pressure that would occur along the existing alignment with sea level rise and climate change, we are very uncertain that this assumption would be viable to sustain a hold the line policy in the medium to long-term.</p> <p>We therefore believe that a move to a realigned position is the most sustainable option in the long term for the management of flood risk to Minehead. This would allow erosion of the Warren to input sediment into the system, allow the embayment to deepen and become more stable whilst still allowing sediment to move along the shoreline to the east. It would also encourage marsh areas to re-establish in Dunster Marshes, which would provide a natural buffer in front of the set back defence line against the action of the sea.</p>

Comments from?	Comments	Action/Response
		<p>Given that there is a present risk of flooding to Minehead from an event with a greater than 4% annual probability we feel that rather than spending money on measures to hold the line in the short term, public funds would best be spent investigating and implementing a realignment solution.</p> <p>That is not to say that in the immediate term, the coastline could not be managed as effectively hold the line, whilst the necessary studies occur, including the current West Somerset Study and planned future Flood Risk Management Strategy, but overall we believe realignment is the best option in the short term."</p> <p>In light of comments received and further review of the information available (as summarised above), including the Black & Veatch report, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p> <p>Re. habitat creation >> Yes it would create intertidal BAP Habitat including Mudflats and saltmarsh, A Defra Outcome Measures Target is to ensure flood defence in this region creates 300 ha of intertidal habitat. There are also requirements to offset the loss of intertidal habitat through coastal squeeze. Therefore this site would provide valuable and significant habitat creation opportunities in line with national policy.</p>
Environment Agency	<p>7d21 Short term: consider Hold The Line. Medium term: consider Hold The Line. Long term: consider Managed Realignment.</p> <p>Whilst a policy of Managed Realignment makes sense due to the nature of the shoreline and the low lying land behind, which potentially could act as a flood pathway to Minehead in the future, we are concerned that not enough time has been given to develop the proposals. By considering this option in the medium to long term it will allow time to develop the various strategies and detailed projects, in order to ensure that this is indeed the best option.</p> <p>Hold The Line does not place a burden on the public purse, given that Dunster Chalets have managed their own flood and erosion risks in the past through the placement of some 40 wooden groynes. Continuing to Hold The Line, whilst detailed studies are carried out into the feasibility of sustainable options, will allow continued management of the coast. However, works should be complementary to the rest of the coastal cell, particularly down drift. These decisions will need to be investigated prior to consents and approvals being given by the relevant authorities.</p> <p>This area would warrant an investigation into actual sea level rise rates, given that the point at which erosion risk becomes actual flood risk is in a very narrow band.</p> <p>Will Managed Realignment result in habitat gain and if so, what type of habitat?</p>	<p>In light of comments received and further review of the information available, including the Black & Veatch report (refer to response above), we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p> <p>Refer also to response to comment above.</p> <p>Re. habitat creation >> Yes it would create intertidal BAP Habitat including Mudflats and saltmarsh, A Defra Outcome Measures Target is to ensure flood defence in this region creates 300 ha of intertidal habitat. There are also requirements to offset the loss of intertidal habitat through coastal squeeze. Therefore this site would provide valuable and significant habitat creation opportunities in line with national policy.</p>
Environment Agency	<p>7d22 The suggested realignment line is along the West Somerset Railway but we would then be committed to maintaining a new defence of similar length to the existing frontage. The potential for habitat creation is limited as it is not linked to a Natura 2000 site, so we do not see how we would justify the Managed Realignment policy in the first epoch.</p> <p>The suggested policies imply that money will be spent on investigating and realigning the shoreline, then more money will be spent holding the landward boundary. If a realignment scheme is to be sustainable then should it require a Hold The Line policy into the future. If the Hold The Line policy relates to the sustainability of the West Somerset Railway line then thought should be given to how the railway will manage its assets in to the future and the options available to them. Should the railway move its track to a flood proof location then the Managed Realignment options may increase.</p>	<p>The response from West Somerset Railway states that relocation/realignment of the railway is not feasible and if it is not protected then it will be lost with impacts on the economy of the wider area. We have reviewed and revised the text as appropriate to ensure points made here are reflected in the policy statement and implications tables. We have also clarified the need to work with the railway line and not adversely impact on it. It will be up to more detailed study to establish how this could occur. This has been taken forward as an item in the Action Plan.</p> <p>It should be noted, however, that the coastline in this area is already very close the railway line and there are presently no defences along the length of the frontage. MR in the short term is felt to be needed to ensure that the risk to the railway line, for the reason stated above, as to intervene sooner rather than later would increase the risk to this important asset. By doing this in the short term will still allow the coastline to evolve naturally.</p>

Comments from?	Comments	Action/Response
	<p>Will Managed Realignment result in habitat gain and if so, what type of habitat?</p> <p>Flood cell consistency is required.</p>	<p>Re. habitat creation >> Yes it would create intertidal BAP Habitat including Mudflats and saltmarsh, A Defra Outcome Measures Target is to ensure flood defence in this region creates 300 ha of intertidal habitat. There are also requirements to offset the loss of intertidal habitat through coastal squeeze. Therefore this site would provide valuable and significant habitat creation opportunities in line with national policy.</p> <p>We believe the policy in this area is consistent with the approach taken along the frontage to the west which also seeks to preserve the West Somerset Railway line.</p>
Environment Agency	<p>7d23</p> <p>Hold The Line to protect the Blue Anchor Hotel contradicts the approach taken at Porlock Weir, where the community are left to the elements with a No Active Intervention policy and the suggested removal of properties from the sand dunes at Brean.</p> <p>A Hold The Line policy will allow funding to be sought to protect the Blue Anchor Hotel, however, this will be for the private land owner to pay for and cannot be guaranteed through cost benefit assessments. By extending the policy unit boundaries this has incorporated the hotel within the Hold The Line policy but is this really feasible?</p> <p>We do not feel that the road is at risk in the near future. What evidence suggests that this is the case?</p> <p>There is no flood risk at Blue Anchor, the defences being for erosion protection. Any flood risk arises from the Pill River becoming tide locked on the landward side of the B3191.</p> <p>Is the statement that 'replacement defences are unlikely to attract public funds...' consistent with the Black & Veatch report?</p>	<p>We do not believe this is contrary to the Porlock Weir policy. We believe that HTL on the east side of Blue Anchor is needed to preserve the local coast road for consistency in other parts of the SMP where this is an objective of the Plan. The fact that NAI at Blue Anchor is in the long term reflects that defences along most of Blue Anchor are very recent and likely to remain for many years to come, unlike at Porlock Weir where defences are old and need replacing sooner. Note also that the policy at Porlock has been amended to allow continued defence if funds are available but again reflects that this is likely not to be sustainable in the long term.</p> <p>We have reviewed and revised the policy text to make sure it is clear about funding issues and implications if funding is not available.</p> <p>We have reviewed the erosion information and found that it has been plotted incorrectly on the policy unit maps. This has now been corrected. The information available to the SMP suggests that if the currently defended cliffs at the east end of Blue Anchor were allowed to retreat then cliff recession at natural rates could result in up to 50m of recession as a result of a single event. It is common for a period of accelerated erosion post-defence failure and so if defences here failed it would be very likely that recession would occur rapidly in this area, and towards the upper end of the recession potential as the cliff line 'catches up' with the already retreated cliff position in the adjacent undefended section. The top of the cliff is currently less than 50m from the road and therefore there is a need to manage this risk. Having reviewed all the information, we believe the policy here is correct. We have also revised the policy statement to ensure that justification is clear.</p> <p>Flood zone mapping from the Environment Agency has been used to inform the SMP shows there is a small risk of 'tidal' and 'tidal/fluvial' flooding. We do not believe that the area at risk of flooding justifies future defence replacement once the existing defences reach the end of their effective life. We have reviewed again the Black & Veatch report and this is also stated in that report. This report also states that there is likely to be insufficient economic justification to hold the line in this area long term.</p> <p>The policy however, is to maintain the defences for as long as possible as they have only recently been constructed at significant expense. To not maintain them adequately would not make sense.</p>
Dunster Parish Council	<p>The parish council strongly oppose the position of the proposed new flood line and feel the SMP should maintain or upgrade the level of protection provided by existing coastal defences. Protection of Dunster Beach and the Golf Course are of great importance and we could also lose valuable agricultural land. Dunster Parish Council therefore fully support Dunster Beach Holidays and Minehead Golf Club in their objections to the scheme and feel the flood line should stay as it is.</p>	<p>The lines indicated in the draft SMP are only indicative to show what the policy could mean in spatial terms. Any future realigned defence position would be based on much more detailed research and full public consultation.</p> <p>In light of comments received and further review of the information available, including the Black & Veatch report, we have changed the policy along The Warren/Dunster frontage to be short term = HTL; medium term = HTL; long term = MR. This will allow beach management to continue for as long as feasible whilst constructing a secondary defence bank in the short term to protect Minehead against flood risk. The long term policy for MR reflects the likelihood that continuing to defend the existing line is likely to become unfeasible in the future.</p>
Local Residents	<p>My wife and I own a section of beach from the level crossing in a westerly direction for approximately half a mile. About 1984 Somerset County Council in their wisdom and without consultation put about 100 ton or so of rocks on the easterly side of the steps which are opposite the railway station in the hope of protecting the sea wall. In recent years the sea wall has been refurbished.</p> <p>Work has also been carried out at Dunster Beach, groynes have been installed and other work taken place. All this work has been carried out to the detriment of the beach between the level crossing to entry of the river flowing through Dunster.</p> <p>Up until the 1970s there were a row of 50 wooden chalets approximately 20ft by 12ft standing on concrete bases above the high water mark extending some 400 m down the beach, to the boat house owned by Mr</p>	<p>We thank you for your comments. We have been fully informed about the various defences and actions along the Blue Anchor Bay shoreline and assessed implications of these as part of developing SMP policies.</p> <p>It is beyond the remit of the SMP to comment on heritage designation issues. The SMP only sets policy for flood and coastal defence. Heritage assets form one part of the overall considerations made in setting policy. Protection of heritage assets is not necessarily a primary driver for a policy to defend the coast.</p> <p>We are unaware of any recent modelling of tsunami in the Bristol Channel.</p>

Comments from?	Comments	Action/Response
	<p>Greenslade. There are now only some 20 concrete chalets remaining these can be lived in all year round.</p> <p>In recent years a great deal of erosion has taken place, caused in my opinion by interference with the nature of the bay, in any forthcoming strategy, consideration must be given to what is now 'the weakest link' from the level crossing to (groyned fence line) 1000m which have all but eroded adjacent to the river outlet where in the past the tide has broken through to fields.</p> <p>Also ground adjacent to the WW2 gun emplacement opposite the level crossing the sandbank shingle had been cut back and is now closing on what the high tides weather and winds will bring, with DoE and other agencies not giving due consideration to all owners of land along shoreline.</p> <p>The existing chalets and land at Blue Anchor Chalet Park have an approximate value of £3million.</p> <p>The other item that has come on the agenda as far as we are concerned is the WW2 section post. English Heritage in their wisdom at the behest of a unnamed third party have decided it be listed as a historical monument. This has been signed for by the Minister for Culture, Media and Sport without any visual inspection of the site from relevant signatories.</p> <p>At present you have 7 million pounds to protect the Somerset coast line. We will probably require 1 million to protect the section post for posterity, as we cannot afford to let this Grade 2 listed building crumble into the largest cemetery in the world, namely the sea, especially as your senior office the Rt Hon B. Bradshaw MP requires.</p> <p>Some five years ago I was told the DoE Bridgwater had done a model of the Bristol Channel and expected a Tsunami in the next 200 years (any news yet?).</p> <p>I would suggest that a eighty metre seawall be built and rocks straggled in a defensive manner 3 metres above mean high water.</p>	

Blue Anchor to Hinkley Point – 7d24 to 7d30

Comments from?	Comments	Action/Response
Watchet Market House Museum	Section of coast from Watchet to Doniford is eroding rapidly i.e. from area known as the Recreation Ground to Doniford access slip. Sections have been protected with miscellany of methods over the years but they need to be joined up. The railway line is vital to the economy of the area from a tourist perspective but the line will have nowhere to go if erosion continues 'as is'. At the area known as the Queen Bee site between the HW mark and the line is very unstable and vulnerable to extreme storm surges from WNW on a high spring tide. While the line can be cut further in land here this will be very disruptive and costly. Early action to join up the various types of protection would slow the process.	<p>The policy in this area is to provide protection through a hold the line policy. Such a policy would enable the relevant authorities to investigate in more detail options for protecting this coast.</p> <p>The timing of when studies/intervention are needed has been considered when developing the Action Plan</p>
Burnham and Somerset Levels Sea Flood Study Corp.	SEE DIAGRAM ON COMMENT FORM (concerning that "one big further slippage and the road [B3191] would go.") West Somerset Railway at risk at Helwell Bay—Doniford Beach Halt.	Having reviewed the information held further we have moved the policy unit boundary between 7d24 and 7d25 further west to cover more of the B3191 road where it turns inland such that it would be included in the hold the line area of 7d25 rather than the no active intervention area of 7d24. This will ensure that opportunity to defend the road exists should it not be possible to continue to realign the road in the future.
West Somerset Railway	<p>Following summarise key points from letter submitted:</p> <p>It is entirely conceivable that over the timescale of the SMP the line will function increasingly as an important transport link. If protection of the line is not maintained future reinstatement or realignment of the track bed following storm or flood damage would be prohibitively expensive.</p> <p>We would urge that the historic significance of the railway and probable increased importance to the local population of the line as a transport link is highlighted in the Plan. This would ensure that due regard is taken when the relevant authorities make use of its recommendations in determining what, when and where future protection works are carried out.</p> <p>In the section 7d24 to 7d27, the WSR is principally concerned about policies at the east of unit 7d25. The railway runs close to the shoreline on top of low cliffs for around 1.5km to the east of Watchet, heading inland</p>	We have ensured that the points made here are reflected in the policy statement, particularly with regards cost of realigning track being prohibitive and historic nature of the line. We acknowledge the future of the whole line needs to be considered and will review statements to ensure this point is addressed, however the cost of realigning the track needs to be compared to the cost of maintaining and upgrading the existing defences under a scenario of sea level rise.

Comments from?	Comments	Action/Response
	<p>at Doniford. We note that it is proposed to maintain an improve the existing defences here, but are concerned about the dividing line between this and the coastline to the east of this where it is proposed in the medium to long term to allow coastal evolution to occur.</p> <p>Currently at this point some slippage of the cliff has occurred, and further erosion could threaten the track bed, the highway bridge over the line at this point and Doniford Road carried by the bridge. We would urge that the plan recommends that during maintenance of the existing defences protection is extended eastwards to safeguard this area.</p> <p>Within the table of implications we propose that the railway is referred to under ‘Architectural and Archaeological Heritage’.</p>	
English Heritage – South West Region	7d28 -The medium term policy of NAI is likely to have an adverse effect on the early post medieval haven at Lilstock.	We have added this detail to the implications tables.
Member, Geologists Association	<p>With experience of Norfolk-Suffolk coasts as a professional geologist, I am familiar with Natural England and Environment Agency policy of ‘No Active Intervention’ hard though it may be to adopt. This approach applies to the coast of Blue Anchor, through Warren Bay, to Watchet. Our Cliffs are actively receding. What should be considered, however, <u>must</u> be weight restriction on vehicles using the Watchet to Blue Anchor Road. Heavy coaches and lorries exacerbate the probability of cliff collapse, already increased by the building of the Lorna Doone Estate (2008-2009). Diverted groundwater flow has caused slips on West Cliff. 1500 tonnes fell in winter of 2009 along the line of the Watchet fault to Warren Bay.</p> <p>NB. Refer also to notes and diagrams provided describing the geological situation at West Cliff, Watchet.</p>	<p>Whilst we note your concern, weight restrictions are beyond the remit of the SMP. This comment has been directed to the highways authorities.</p> <p>We have reviewed the geological information provided and included details from it in the process understanding report, as appropriate (Appendix C).</p>
Environment Agency	<p>7d24 This policy unit contains the large landslip that poses a risk to the B3191 at Cleve Hill. Future erosion events are likely to render the road impassable and so the sustainability of this road is at risk.</p> <p>The landslip is being monitored. Perhaps a comment outlining the ongoing monitoring and provisions to permit work for the benefit of the road should be made?</p>	We have added text to the policy statement to discuss this area explicitly.
Environment Agency	<p>7d26 Should the policy be written to reflect to potential for the land owner to secure public funds? Doniford Holiday park appear to be funding their own defences and as such place no burden on public funds. The park continues to bring money into the area and provides jobs for local people. The park may prove to be at increased risk in the future and they will need to fully understand these risks, ensuring that their site is safe and sustainable.</p>	Having reviewed the information available, we have changed the policy to be NAI in all three epochs to reflect that it is unlikely that public (flood and coastal defence budget) funds would be justified to defend this area. The revised policy statement does, however, clearly state that if other funds area available, then continued defence could occur here, although noting the uncertainty as to how sustainable this may be long term.
Williton Parish Council	<p>(1) 7d24 – Request to Hold the Line</p> <p>(2) 7d25 – Agree and noted</p> <p>(3) 7d26 – It was considered that holding the line for the medium and long term should be the way forward in order to protect houses, access to the beach and heritage (listed lime kilns). In addition, the existing defences were in need of attention now.</p>	<p>(1) We have appraised options in detail based on technical, environmental, social and economic factors. This offers no new information to justify a HTL policy.</p> <p>(3) HTL in medium and long term was appraised in full as part of option development, including consideration of beach and heritage assets, and found not to be appropriate. Therefore do not believe this comment to provide reason alone for changing the policy here.</p>

Hinkley Point to Burnham-on-Sea (Parrett Estuary) – 7d31 to 7d42

Comments from?	Comments	Action/Response
Resident of West Huntspill	Having the second highest tidal flow in the world means that our area is probably under a greater threat from sea inundation than other areas of the country. 1981—December 13 th will never be forgotten—sea defences breached from Minehead to Sandbay, widespread flooding.	Comment noted. No action required.
English Heritage – South West Region	7d32 - Under the Managed Realignment proposed for the medium term, prehistoric peat and forest beds are likely to be exposed to erosion and loss. 7d34-7d37 Steart Peninsula Page 189 We feel that the wording used to describe the implications for the proposed plan is misleading. The second paragraph starting 'Historic landscape of reclaimed....' should be re-written to reflect the fact that there will be loss of the Historic Landscape if the early medieval reclaimed landscape develops into intertidal saltmarsh and mudflat. There will be similar loss of the early Medieval reclaimed landscape on Pawlett Hams if the proposed managed realignment takes place.	7d32 - This impact has been added to the implications tables. 7d34-7d37 – Text for Steart Peninsula has been revised through working closely with those taking forward the Steart project to ensure that the SMP uses up-to-date information and thinking..
Parents Concerned About Hinkley	Short and long term policies seem to protect the main coastline communities at and around Burnham-on-Sea. A map printed in local papers a few years ago showed all of Burnham, Berrow, Highbridge and Brean underwater. Presumably the SMP overrides these projections?	Unclear what maps are referred to, but may be flood risk maps under a no active intervention scenario. The SMP considers maps such as these when developing policy options in order to identify areas where management is needed to reduce flood and erosion risk.
Environment Agency	7d39 Combrich – Bridgwater West The issue with this unit stems from the SMP vision for the River Parrett which is a more naturally functioning estuary with more managed realignment (MR). Substantial MR in the estuary will have substantial geomorphological effects which are uncertain and high risk. Geomorphologists who have looked at this area suggest that more realignment means an increased tidal prism which will cause increased erosion of Burnham on Sea beach. I can't believe the vision should be to lose Burnham Beach! Studies (Parrett Estuary Strategy) have already been done that shows it is marginally more economic to upgrade the existing defences than realign. Therefore the long term policy should be hold the line unless future studies show there balance has shifted towards MR. This could be the case if we lose more intertidal habitat in the Severn Estuary than can be replaced there. 7d42 Dunball-River Brue >> The issue with this unit stems from the SMP vision for the River Parrett which is a more naturally functioning estuary with more managed realignment (MR). Substantial MR in the estuary will have substantial geomorphological effects which are uncertain and high risk. Geomorphologists who have looked at this area suggest that more realignment means an increased tidal prism which will cause increased erosion of Burnham on Sea beach. I can't believe the vision should be to lose Burnham Beach! This would especially be the case if there was substantial realignment at Huntspill. Also there is no economic benefit in realignment at Huntspill. The cost to rebuild the defences and Huntspill sluice is enormous. The new defences would be just as long as the current ones. It is also possible that southern Burnham on sea would be slightly worse off than the current position because there would be the likelihood of some wave attack from the south in prevailing southwesterly gales. So I believe the policy should be HTL unless future studies show that the Huntspill area is required for replacement habitat for the Severn Estuary (which is unlikely).	Parrett Strategy assumed that Steart Peninsula would remain. The SMP does not agree with that assumption and so has proposed that in the long term managed realignment is more likely to be the appropriate option rather than continuing to defend the whole of the Parrett Estuary. With regards to Burnham-on-Sea beach, it is possible that the beach could be lost in the medium to long-term as a result of sea level rise and continued constraint imposed by the presence of hard defences here. Whilst options that involve retaining a beach here would be more desirable, it is not the prime driver in setting policy given that the policies in other areas nearby aim to retain beach resource for the benefit of the wider area. We have further reviewed the policies for the Parrett with additional new information from the developing Steart Realignment Project is in the process of selecting a preferred option.
Bridgwater Town Council	In the absence of significant additional funding and prospects of marginal increases in foreseeable future appear only way forward. Essential that proposals enlarge and enhance River Parrett Barrage proposals in short/medium term.	The design of a River Parrett Barrage would be undertaken in more detailed studies, the timing of which has already been identified in the Parrett Estuary Strategy. It is not the remit of the SMP to do this, merely indicate the policy under which it would occur. Therefore no action required.
Local Resident	(1) Reasons for answer to number 5: My take is that the draft SMP and Appendix C does not spell out the impact of additional sea defences required for the proposed Hinkley Point 'C' (and likely 'D') Power Stations and which would appear to further restrict the supply of sediment to sites further east. (2) Although I appreciate planning permission has not yet been given, it seems reasonable to conclude that it is 90% certain the developments will go ahead. This consultants report thus appears out of date/with a lack of joined up thinking. Could an addendum be issued to account for this development?	(1) The SMP can not pre-guess future development of the site. However we have revised the text to ensure that it addresses possible future Hinkley Point scenarios as they stand at present but highlight the need for any future development to demonstrate impacts. (2) It is possible that an addendum could be added to the SMP in the future, once developments have been approved and detailed plans put in place, to ensure that the SMP is up to date. It is also agreed that whilst the SMP cannot pre-guess the outcome of planning decisions, it should not ignore that these proposal are in place.
Resident, Watchet	I understand that the plans to build 1 or 2 new nuclear power stations at Hinkley Point are not being put in doubt by the fact that their location will be flooded within this century. Please do consider that besides being harmful and expensive, they will then be useless. Perhaps a slightly higher	The decision on Hinkley Point will be taken by the planning authorities, who will use information provided in the SMP. The developers are also undertaking their own detailed studies to address potential risks.

Comments from?	Comments	Action/Response
Old Cleeve Parish Council	<p>location might be better to create all those jobs.</p> <p>Hinkley Point Power Station is on the lowest point and nuclear waste stored on site would be vulnerable. We do not see this mentioned in the consultation document except as at unit.</p> <p>Mention should have been specifically to the problem of Hinkley Point Power Station – old or proposed.</p>	<p>This has been considered in option development – we have amended the implications table to make specific reference to this risk.</p>
Otterhampton Parish Council	<p>With regard to Steart Village (7d35) we disagree with the preferred policy in the medium and long term where 'no active intervention' is proposed. This policy would inevitably lead to greater flood risks for residents as through time any protection would deteriorate.</p> <p>We hope that the scenario envisaged in the preface to your report of September 2002 by Humphrey Temperley (Babtie Brown and Root – Stolford to Combwich Strategy Study) with regard to Steart could still be possible. Quote: - "There could be an opportunity here to provide new areas for nature conservation to replace some of these losses, whilst investing in new sea defences for domestic property and some of the farmland. We could choose a fresh line inland of the failing defences, which will be sustainable in the long term. This concept is call "managed realignment".</p> <p>Whilst we accept some forms of protection may not be wanted by Steart residents (such as heavy rock armour on the shoreline) the lack of any increased flood protection for Steart village in any of the managed realignment schemes is to be deplored. The huge expenditure of public money may be hard to justify if any flooding tragedy were to take place.</p> <p>Unit 7d36 >> disagree with the proposed medium term policy for no active intervention. A policy here of managed realignment would be more in accord with the objectives of the plan for the Parrett Estuary as outlined in your supporting information in the draft policy options summary (July 2009).</p> <p>Unit 7d37 >> We disagree with the proposed medium and long term policy for no active intervention. A policy of managed realignment would be more effective here. Many of the possible schemes for managed realignment proposed for the Steart Peninsula would involve regulated tidal exchange mechanisms and these would be rendered pointless in any managed scheme should the present defences on this stretch of estuary be allowed to fail through no active intervention.</p> <p>Continued maintenance of defences along the outer west bank of the Parrett Estuary in the short to medium term would support any realignment of the open coast of the Steart Peninsula and also continue to constrain the estuary's low water channel. Therefore the potential for changes that could cause the low water channel to swing anti-clockwise and affect the east bank will be reduced.</p> <p>Unit 7d38 >> Supports hold the line policy for Combwich.</p> <p>The Parish Council are also concerned as to the environmental impacts of the construction of a surge barrier upstream of Combwich on the Parrett.</p>	<p>We have appraised HTL for Steart in the option development, and worked discussed options with the Steart Managed Realignment Project. We do not believe a HTL policy is the right one for this location based on the information available.</p> <p>The purpose of the SMP is to review management practices and, if necessary, introduce changes where it is felt appropriate to do so given a range of criteria.</p> <p>Policies for 7d36 and 7d37 to be reviewed further in discussion with Steart Managed Realignment Project team as they near selection of a preferred option. Any MR proposal would involve consideration of mitigation measures and exit strategies to manage the process.</p> <p>More detailed investigation of a barrage and its implications will be needed in the future. These concerns have been considered when developing the action plan.</p>
RSPB	<p>7d31, 7d32, 7d33, 7d34, 7d35, 7d36, 7d37, 7d38, 7d39, 7d42 >> The Appropriate Assessment (AA) recognises that in these policy units, where the proposed policies include <i>hold the line, sea level rise will result in the progressive loss of intertidal and supratidal habitats</i>. The SMP and AA appears to suggest that since policies for managed realignment will create new intertidal habitat, and that the total potential for new intertidal habitat exceeds predictions for habitat losses to coastal squeeze, the SMP policies will not have an adverse effect on the integrity of the Severn Estuary Special Protection Area, Special Area of Conservation and Ramsar site.</p> <p>However, as set out in our response letter, creating new habitats outside of the designated site boundary cannot be considered as Regulation 48(6) <i>mitigation</i>. The plan must therefore be considered to adversely affect the integrity of the N2K sites. Consequently, to be approved, it must meet the tests of Regulation 49 (there being no alternative solutions and imperative reasons of overriding public interest). If these tests are met, the provision of new intertidal habitat outside the boundary of the N2K sites would in our view be required as <i>compensatory measures</i> to meet the Regulation 53 requirement <i>to ensure that the overall coherence of Natura 2000 is protected</i>.</p> <p>Compensatory measures should be secured before a plan that would adversely affect the integrity of a N2K site can be adopted. To give the necessary level of assurance, we believe that the SMP must commit to the following:</p>	<p>Updated HRA issued to EA 7/5/10, addressing all issues identified in these comments. Further amendments may be required following further consultation with NE / CCW.</p>

Comments from?	Comments	Action/Response
	<ul style="list-style-type: none"> • Predicting, identifying and monitoring habitat losses resulting from SMP policies for specific N2K habitats. • Replacing habitat losses in a functionally like for like manner, at least on a 1 to 1 basis. • Maintaining an audit, or balance sheet, for each habitat type, of (i) N2K Site habitat losses resulting from SMP policies and (ii) N2K site habitat gains. • Habitat gains at any time exceeding habitat losses. <p>7d32, 7d39 >> We welcome the policies for managed realignment in these Policy Units, to create new areas of intertidal habitats, however we question the deferral of this policy to the Medium term, with hold the line the short term policy.</p> <p>We accept that the Severn Estuary Flood Risk Management Strategy will provide the detail needed to determine exact locations and nature of opportunities for managed realignment. However, we believe that broad areas that are considered to have potential for realignment should be identified in the SMP and that work to progress them should be undertaken in the short term in order that they can be implemented when this work is complete. The policy would appear to defer the implementation of managed realignment opportunities for at least 20 years, which in our view is an excessive delay.</p> <p>7d34, 7d35, 7d36, 7d37, 7d42 >> We welcome the policy for managed realignment in this Policy Unit, to create new areas of intertidal habitats.</p>	<p>Timing MR both reflects need for more detailed study and also the findings of the recently completed Parrett Strategy Study. Therefore disagree with moving timing of MR.</p>
National Grid	<p>National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks <i>[NB: details have been provided for information to the SMP].</i></p> <p>Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.</p> <p>National Grid infrastructure within the Shoreline Management Plan area</p> <p><u>Electricity Transmission</u></p> <p>National Grid's high voltage electricity overhead transmission lines / underground cables within the Shoreline Management Plan area that form an essential part of the electricity transmission network in England and Wales include the following:</p> <ul style="list-style-type: none"> ▪ ZG line – 400kV route from Hinckley Point substation in West Somerset to Melksham substation in North Wiltshire <p>The following substations are also located within the Shoreline Management Plan area:</p> <ul style="list-style-type: none"> ▪ Hinkley Point substation – 400kV & 275kV <p>National Grid has provided information in relation to electricity transmission assets via the following internet link:</p> <p>http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW</p> <p><u>Gas Transmission</u></p> <p>National Grid has no gas transmission assets located within the Shoreline Management Plan area.</p> <p>Specific Comments</p> <p>National Grid's 400kV ZG overhead electricity transmission line runs from Hinckley Point substation in West Somerset to Melksham substation in Wiltshire, passing through the potential area of realigned coastline at the Steart Peninsula. I would like to reiterate comments made by National Grid to Sedgemoor District Council in response to the proposed Steart Compensation Scheme.</p> <p>National Grid does not own the land over which the overhead lines cross, and it obtains the rights from</p>	<p>We have reviewed and amended the Steart policy statement working closely with the team carrying out the Steart MR project to reflect possibility/need for protecting power lines (if they can not be relocated).</p>

Comments from?	Comments	Action/Response
	<p>individual landowners to place our equipment on their land. Potential operators of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ because of the strategic nature of our national network. We advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning a development. Because of the scale, bulk and cost of the transmission equipment required to operate at 400 kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central Government.</p> <p>National Grid has no plans, either at present or in the future, to relocate the existing 400 kV line which passes through the Steart Peninsula area. We would therefore request that the potential impact of coastline realignment on the 400kV line is fully considered, in particular the potential for the proposals to compromise the integrity of the associated suspension towers.</p> <p>We therefore wish to be involved from an early stage in the Steart Managed Realignment Project in order to ensure that the safe and secure transportation of electricity is not compromised.</p> <p>The following points should also be taken into consideration:</p> <ul style="list-style-type: none"> ▪ Statutory electrical safety clearances must be maintained at all times. These distances are outlined at the following webpage: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/appendixIII/applIII-part2 ▪ Further guidance is available here: http://www.nationalgrid.com/NR/rdonlyres/C185DC83-F57F-41A6-B4F1-6E28B3510E59/18654/APTElectricityOHLGuidance_2_.pd 	
Natural England	<p>7d34-37. 4th Paragraph in Summary of Preferred Plan:</p> <p>There are emphatic statements on losses and impacts that will be incurred through managed realignment, but these depend on the scale and design of the preferred management realignment design. This section should be re-written to accord with the developing Steart MR Project plans. For example, we're not aware of possible losses of property or major infrastructure that could arise from the outline plans currently under discussion. Also, the prevailing assumption is that the pylons carrying the power lines connecting Hinkley Point power station will be defended from inundation.</p>	We have reviewed and amended Steart text in discussion with the Steart MR project team that is investigating management of this area in greater detail to ensure the SMP policy aligns with the latest findings of the detailed study.
Environment Agency	<p>7d31 This unit is not currently defended along the majority of its length and at least half of the frontage is natural cliff.</p> <p>Whist defences are proposed to defend the new nuclear site (should it go ahead), it has not yet been agreed that defences are required and as such the Plan text should not assume that new defences would need to be constructed.</p>	The SMP can not pre-guess future development of the site. However we have reviewed the text to ensure that it addresses possible future Hinkley Point scenarios as they stand at present but highlight the need for any future development to demonstrate impacts. The information used in the SMP was provided some time ago and may need to be updated.
Environment Agency	<p>7d32 - 33 Capital letters required when writing 'National Nature Reserve'.</p>	This text has been amended as suggested.
Environment Agency	<p>7d34 '...the policy is to adopt a retired line of defence...', is this the correct terminology?</p>	Yes, this is correctly used here.
Environment Agency	<p>7d37 Medium term: consider Hold The Line. Long term: consider Hold The Line.</p> <p>Our understanding is that the Parrett Estuary Strategy proposes the Parrett left bank should be maintained long term, to avoid widening the tidal prism and adversely affecting flood risk at Burnham-on-Sea. The move to No Active Intervention after 20 years does not give this security. Are these two plans properly aligned?</p>	<p>We have reviewed and amended Steart text in discussion with the Steart MR project team that is investigating management of this area in greater detail to ensure the SMP policy aligns with the latest findings of the detailed study.</p> <p>Our understanding of the Parrett Strategy is that it does not cover the bank all the way from Comwich to Fenning Island (only part way) and rather defers management here to the Steart MR project. The outcomes of the Steart MR project are therefore more prescient in terms of informing SMP policy.</p>
Environment Agency	<p>7d39 Long term: consider Hold The Line.</p> <p>Ensure policies are aligned with Parrett Estuary Strategy. The issue with this unit stems from the Plan vision for the River Parrett, which is a more naturally functioning estuary with more Managed Realignment. Substantial Managed Realignment in the estuary will have significant geomorphological effects, which are uncertain and high risk. Geomorphologists suggest that more realignment</p>	We believe the SMP and Parrett Strategy are aligned as far as possible. However the outcomes of the Steart MR project, which have appraised the geomorphological data in some detail, are more prescient in terms of informing SMP policy especially in the long term for the outer estuary.

Comments from?	Comments	Action/Response
	<p>could result in an increased tidal prism, leading to the mouth of the Parrett ‘swinging’ eastwards. This would cause increased erosion of Burnham-on-Sea beach, expose the sea wall foundations and allow larger waves to reach the coast.</p> <p>Studies (Parrett Estuary Strategy) have already been done that show it is marginally more economic to upgrade the existing defences rather than realign. Therefore, the long term policy should be Hold The Line, unless future studies show the balance has shifted towards Managed Realignment. This could be the case if we lose more intertidal habitat in the Severn Estuary than can be replaced.</p>	<p>The Parrett Strategy states that “<i>Realignment at Cannington does not emerge as the preferred option using the current economic, environmental and social measures, but on these measures the options are very close</i>”. Bearing this in mind as well as the outcomes of the Steart MR project, we believe that MR in the long term will be more likely to be the right course of action rather than continuing to HTL.</p>
Environment Agency	<p>7d41 Incorrect spelling of Bridgwater on map.</p>	<p>We have corrected this error.</p>
Environment Agency	<p>7d42 Long term: consider Hold The Line.</p> <p>Ensure policies are aligned with Parrett Estuary Strategy.</p> <p>The issue with this unit stems from the Plan vision for the River Parrett which is a more naturally functioning estuary with more Managed Realignment. Substantial managed realignment in the estuary will have significant geomorphological effects, which are uncertain and high risk. Geomorphologists suggest that more realignment could result in an increased tidal prism, leading to the mouth of the Parrett ‘swinging’ eastwards. This would cause increased erosion of Burnham-on-Sea beach, expose the sea wall foundations and allow larger waves to reach the coast.</p> <p>This would especially be the case if there was substantial realignment at Huntspill, for which there is no economic benefit. The cost to rebuild the defences at Huntspill sluice is enormous and the new defences would be just as long as the current ones. It is also possible that southern Burnham-on-Sea would be slightly worse off than the current position because there would be the likelihood of some wave attack from the south in prevailing south-westerly gales.</p> <p>Realignment of the right and left banks of the Parrett at this location is something that requires a great deal of study.</p> <p>The policy should be Hold The Line, unless future studies show that the Huntspill area is required for replacement habitat for the Severn Estuary (which is unlikely).</p> <p>Pawlett Ham or Pawlett Hams? Inconsistency in document.</p>	<p>We believe the SMP and Parrett Strategy are aligned as far as possible. However the outcomes of the Steart MR project, which have appraised the geomorphological data in some detail, are more prescient in terms of informing SMP policy especially in the long term for the outer estuary.</p> <p>Given the fact that the Steart Peninsula is likely to be allowed to evolve naturally, we do not believe that HTL along the Huntspill side of the estuary will be the most sustainable long term management option and that defences will be more technically sustainable in a realigned position, allowing space for the estuary to evolve more naturally.</p> <p>The reason for leaving this MR policy until the long term reflects information from the EA that the Huntspill Sluice will not need to be replaced until the long term, and it would be at this time MR implementation should be considered. We have amended the text to make sure these points are clear.</p> <p>We acknowledge that this whole area requires more detailed study and this is being carried out as part of the Steart MR project.</p> <p>We have reviewed the document to make sure Pawlett Ham is referred to consistently.</p>

Burnham-on-Sea to Brean Down – 7d43 to 7d46

Comments from?	Comments	Action/Response
Parents Concerned About Hinkley	<p>This seems a reasonable balance between what is economically possible and unjustifiable expense in sparsely populated areas.</p>	<p>The SMP has to work within current Treasury Rules set by the government, which in distributing funds considers where there will be most benefit for the expenditure required. No action required</p>
Resident of Brean	<p>Raise beach entrance at Unity Farm – Build polder (???) along Red Road to protect residents and caravan parks.</p>	<p>The building of a polder is something that could be considered as part of a more detailed study or scheme development for implementing the MR policy (which already states possible need for a secondary defence line). However, the alignment suggested along the road would be to reduce flood risk from the Axe. Whilst this is also a concern that needs addressing, managed realignment along the unit commented on seeks to address flood risk from the open coast should erosion of the dunes increase in the future and a breach occur.</p>
Resident of Berrow	<p>Build polder to protect residents along Red Road and towards Brent Knoll which would safeguard Berrow/Burnham-on-Sea from Axe Flood Plain.</p>	<p>The alignment suggested along the road would be to reduce flood risk from the Axe. Whilst this is also a concern that needs addressing, managed realignment along the unit commented on seeks to address flood risk from the open coast should erosion of the dunes increase in the future and a breach occur. This is something that could be considered as part of a more detailed study or scheme development.</p>
Brean Leisure Park	<p>Need to raise the entrance ramp on the beach access opposite Unity Farm Holiday Centre (44). Long term build polder on west side of Red Road to protect residents and caravan parks.</p>	<p>The alignment suggested along the road would be to reduce flood risk from the Axe. Whilst this is also a concern that needs addressing, managed realignment along the unit commented on seeks to address flood risk from the open coast should erosion of the dunes increase in the future and a breach occur. This is something</p>

Comments from?	Comments	Action/Response
		that could be considered as part of a more detailed study or scheme development.
Farmers inland of Burnham-on-Sea	Our life expectancy does not stretch into medium and long term policy. We were surprised that there was no mention of agricultural land as the potential flooding area covered a huge area of farm land. More surprising as there is now much talk of food security with the reduced value of the pound sterling, climate change and world population rising by approx. 80, 000, 000 per year.	Potential impacts upon agricultural land are included in the assessment of policy options that inform the development of preferred policy. This comment is reflected in the NFU's comment added to the SEA.
M4R Hicks Leisure Ltd	-No short term proposals only long term -No recognition of importance of tourism to county -Believe action can be taken on dunes in Brean area.	The SMP does set both short and long term policies, with short term policies aiming not to be detrimental to the long term policies. Consideration of tourism is given in the assessment of policy options, along with technical, environmental and economic sustainability/viability of providing defence. The policies in this area do advocate pro-active dune management be undertaken in the immediate term.
Retreat Caravan Park	Barrage or no barrage it is extremely important to at least hold the line to protect property and tourism for the economic benefits to the region.	This has been considered in developing policy options, and the preferred policy aims to do this in as sustainable way as possible, also recognising technical and environmental factors.
Local Resident	<ol style="list-style-type: none"> 1. I find it disconcerting, bordering on the sinister, that in the 'Consultation Summary' protecting the Somerset Levels & Moors (AN HISTORIC Flood plain only maintained in its current state by means of pumped underdrainage schemes, pumped farm ditches and pumped Authority ditches) in mentioned twice but there is no mention at all about protecting the Village of Berrow. 2. If it were made clear just what is meant by "active dune management" and the "construction of a set-back defence", it would be a deal easier to comment on whether or not I 'agree' or 'disagree'. Equally, I can find no mention of what would trigger the construction of a 'set-back defence', what its construction would consist and indeed how long it would take to construct. Without such information I cannot for the life of me understand how you expect 'agree' or 'disagree' comments from interested parties. 3. If the work shown on the attached photographs is what might be expected of "active dune management", then I think the sooner the 'set-back defence' is in place the better. Quite how it is that Natural England- who presumably authorised this work – think it is appropriate to delegate such sensitive- and unsupervised work to the Burnham & Berrow Golf Club is beyond understanding. 4. If "active dune management" is to be carried out as an official policy of NDASCAG it would be reassuring were it made clear who would actually carry out the work because with the dead hand of Natural England holding sway over a considerable length of the Berrow Dunes, I for one have no confidence at all that the Dunes would be capable of "holding the line". 	<p>The intention of the plan is to protect Berrow village, it was previously included within unit 7d43 under the hold the line policy for that reason. We have reviewed the available information here and moved the policy unit boundary such that the dunes are under unit 7d44 to reflect the different frontage type here compared to the hard defences to the south. We have reviewed the text to ensure that the intentions of the plan are clearly set out.</p> <p>Details of when, where and how a set-back defence would be constructed would be investigated by more detailed studies in the future. It is not the role of the SMP to do this, only to set the high level policy and provide a direction for future management of flood and coastal erosion risk. We have reviewed the text to make it clearer what is intended and why.</p> <p>It will be up to the various authorities with responsibility in this area to instigate the necessary investigations and works, including the local authority and the Environment Agency. Natural England would also be expected to be involved as a statutory consultee as a minimum. The Action Plan also identifies possible sources of funding needs to be investigated.</p>
Local Resident	<p>All comments as per those contained in my email dated 26/1/09 to Angela and formed my feedback from the stakeholders meeting held on 22/1/09.</p> <p>I note that on the B-o-S forum website that there seems to be more concern that the seawall will be raised and therefore the view of the sea further blocked. How short sighted and stupid that view is. These are the people who will be first in line wanting compensation if (when) the flood comes.</p> <p>ANY OTHER COMMENTS: Until the general population of this area are treading water (sea) in their homes they will continue to show little interest in this subject.</p>	We have re-checked previous comments relating to pro-active dune management, including planting buck thorn, and ensuring consideration is made to the implications of realignment are adequately reflected in the assessments made. These additional comments are noted, but no further action is required.
Resident, Burnham on Sea	<p>SHORE MANAGEMENT PLAN (Areas 7d44 and 7d45).</p> <p>The following summarises key points contained in a written submission.</p> <p>(1) These proposals take no account of the very significant effect tidal power electricity generation would have if it were to go ahead. If any sort of barrage or reef system was constructed it would almost completely negate much of the work done to date [in developing this SMP].</p> <p>(2) Regarding your assertions that the dunes at Brean are eroding can I ask where you obtained that information? My house is in a relatively safe position on what would be an island should the worst scenario ever happen. A WW2 Pillbox approximately 55m from MHWS mark (and approx. 5m below the dunes in front of it in my back garden was, I'm informed, almost at the sea edge when it was constructed – surely evidence of dune building. Does the erosion your report refers to occur only on the dunes in section 7d45?</p> <p>(3) Apparent inconsistency in short term policy. On page 208 there is reference to 'hold the line' without early removal of property and maintenance of the rock revetment, where as on page 38 of the Draft Policy Options Summary it states 'Managed Realignment' and removal of some properties but no mention of revetment maintenance. The difference between the 2 reports continues into the medium term proposals. Are the two</p>	<p>(1) We agree that a barrage scheme could also provide a defence role in the future; the extent would, however, depend upon the location and design of the barrage. However, much more work is needed to assess the pros and cons of a Severn tidal power scheme before the government can reach a decision on whether to go ahead with a scheme and if so, which scheme and on what terms. It was not, therefore, considered appropriate for the SMP to pre-guess outcome of these studies.</p> <p>(2) The net long term trend for the Brean dune system as a whole is one of erosion, however, redistribution of some of this eroded sediment means that at a local scale there are also areas of accretion. We note your comment, however, and have amended the text to clarify this.</p> <p>(3) The Draft Options Summary report was produced to gain stakeholder views on initial proposed preferred policies. These policies were reviewed following feedback from stakeholders and therefore the SMP consultation draft supersedes the previous report. The consultation process is more fully described in Appendix B.</p> <p>(4) the text has been reviewed to ensure it is clear what is meant by set back defences and how these would be more sustainable than continuing to defend along the dune toe.</p>

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	<p>separate reports produced by different teams?</p> <p>(4) There is no explanation of what form 'set-back defences' would take but to be effective they would have to be very substantial structures and they would make worthless all the property in their vicinity. Which are the properties that might require to be 'relocated'? The policy should be Hold the Line utilising additional rock revetment wherever possible to protect the dunes if it is found necessary to do so. The argument that this form of defence would ruin the beach for tourism does not hold because set back defences would be even worse except, possibly, at the north end of 7d45.</p> <p>(5) I can not understand why the River Axe should be allowed to change its course.</p> <p>(6) I have lived here for about 3 and a half years and in that time the sea has only damaged the dunes in 7d44 once, as a result of a southerly storm coinciding with high sea level. The erosion was fully restored in 4 months.</p> <p>(7) Finally, what evidence is there that sea levels are rising?</p>	<p>(5) The possibility of the River Axe changing its course is merely included as a possible long term implication of the policies as set out in the draft plan; it is uncertain if it would actually change its course.</p> <p>(6) The SMP has to set policy for 100 years and therefore has to consider long term trends and impacts. Our understanding of this coastline suggests that there is relatively little new sediment entering the dunes and also along much of this shoreline the dunes have been modified and built up, therefore they are likely to be susceptible to future changes in the climate and in sea level rise. The impact of sea level rise is likely to mean that the toe of dune systems will be exposed to wave action more frequently and therefore erosion will occur. Some of this material may be moved landwards by winds to build dunes further back (if allowed), whilst some material will be moved alongshore or offshore. The dunes are also vulnerable to any change in the wind direction or change in the frequency or intensity of storm events. Although dune system can recover after storms, as noted in the comments, this depends on whether a storm is quickly followed by another storm. The size of the dunes and the restrictions placed upon it means that we need to carefully consider how to best manage them in the future, to ensure both their survival and also protection to the wider hinterland.</p> <p>(7) Evidence from tidal gauges around the UK indicate that sea levels have been rising over, at least the last century. What is less certain is the rate at which sea levels are likely to rise in the future. The latest research suggests an acceleration in the rate of sea level rise and further information can be found from UK Climate Programme (UKCP09) website. In developing the SMP, Defra guidance is followed, and part of this advises which projections of sea level rise to use.</p>
On behalf of Brean Down Farm	<p>As Mr Vowle understands it, the proposed policy in the short, medium and long term is not to reinforce the sea defences and allow the land and property in this area to become flooded. Indeed the SMP for the area of the River Brue to Brean Down states that where appropriate to seek to allow natural processes to continue. We must continue that my client owns the property known as Brean Down Farm, which lies at the foot of Brean Down, comprising a 200 acre dairy farm. The farm was purchased in the late '50s from Wyndham Estate, at that time the Wyndham Estate passed over responsibilities of flood protection to the local authority. If the policy is to let 'natural processes to continue' which result in the flooding of my client's property, then naturally he will require compensation. It should be remembered that this property is my client's home and also his business.</p> <p>Without doubt there are other properties adjoining including caravan owners, who will be very much affected by this policy.</p> <p>My client wishes to make the strongest representation possible against this proposed policy.</p>	<p>The policies that affect Brean Down farm are largely HTL in the short and medium term and into the long term. Any impacts on the farm are likely to be relatively small in the short and medium term in particular.</p> <p>It is not within the remit of the SMP to comment on compensation issues. However, the Government, in its response to the 1998 Agriculture Select Committee report into flood and coastal defence, stated the current approach to compensation:</p> <p style="padding-left: 40px;">'Except in limited circumstances, no compensation is payable to those affected by flooding or erosion, including cases where it is decided not to defend a particular area, or to undertake managed realignment. This approach, adopted by successive Governments, is justified by current legislation, which provides operating authorities with permissive powers to undertake flood and coastal defence works. Save for the specific requirements of the Habitats Directive, there is no general obligation to build or maintain defences either at all, or to a particular standard. Consonant with this approach, the legislation also makes no provision for compensation from public funds to persons whose property or land is affected by erosion or flooding'</p> <p>Where managed realignment is proposed, there may, however, be opportunity for financial compensation for landowners and this is discussed in a separate note prepared by Defra and available from the Defra website: http://www.defra.gov.uk/environment/flooding/policy/guidance/realign.htm#3.4%20Financial.</p> <p>The objection to the proposed policy is noted but does not add any new information to that already considered in option development and so does not in itself justify changing the policy.</p>
Local resident and parish councillor	<p>(1) I am surprised at the statement of 'well established dune system at Berrow' – I believe the dunes to be badly damaged. 2 areas of dune must be distinguished at Brean – from Berrow to the start of Warren Road. The dunes have grown continually for the last 60 years, in places grown 25 yards (2 dunes). From Warren Road north to the Down erosion and coastal building have eroded the dunes.</p> <p>(2) The importance of the economy not only to the village but to Sedgemoor and Somerset must be realised and the effect that set back defences would have.</p> <p>(3) The possibility of a barrage should not be ignored.</p>	<p>(1) The information provided has been noted and has been used to re-check the information already held and to clarify text in the policy statement.</p> <p>(2) This has been considered in the option development. Adaptation measures would be needed as part of any managed realignment.</p> <p>(3) (1) We agree that a barrage scheme could also provide a defence role in the future; the extent would, however, depend upon the location and design of the barrage. However, much more work is needed to assess the pros and cons of a Severn tidal power scheme before the government can reach a decision on whether to go ahead with a scheme and if so, which scheme and on what terms. It was not, therefore, considered appropriate for the SMP to pre-guess outcome of these studies.</p>
RSPB	<p>7d43, 7d45 >> The Appropriate Assessment (AA) recognises that in these policy units, where the proposed policies include <i>hold the line, sea level rise will result in the progressive loss of intertidal and supratidal habitats</i>. The SMP and AA appears to suggest that since policies for managed realignment will create new intertidal habitat, and that the total potential for new intertidal habitat exceeds predictions for habitat losses to coastal squeeze, the SMP policies will not have an adverse effect on the integrity of the Severn Estuary Special</p>	<p>Updated HRA issued to EA 7/5/10, addressing all issues identified in these comments. Further amendments may be required following further consultation with NE / CCW.</p>

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	<p>Protection Area, Special Area of Conservation and Ramsar site.</p> <p>However, as set out in our response letter, creating new habitats outside of the designated site boundary cannot be considered as Regulation 48(6) <i>mitigation</i>. The plan must therefore be considered to adversely affect the integrity of the N2K sites. Consequently, to be approved, it must meet the tests of Regulation 49 (there being no alternative solutions and imperative reasons of overriding public interest). If these tests are met, the provision of new intertidal habitat outside the boundary of the N2K sites would in our view be required as <i>compensatory measures</i> to meet the Regulation 53 requirement <i>to ensure that the overall coherence of Natura 2000 is protected</i>.</p> <p>Compensatory measures should be secured before a plan that would adversely affect the integrity of a N2K site can be adopted. To give the necessary level of assurance, we believe that the SMP must commit to the following:</p> <ul style="list-style-type: none"> • Predicting, identifying and monitoring habitat losses resulting from SMP policies for specific N2K habitats. • Replacing habitat losses in a functionally like for like manner, at least on a 1 to 1 basis. • Maintaining an audit, or balance sheet, for each habitat type, of (i) N2K Site habitat losses resulting from SMP policies and (ii) N2K site habitat gains. • Habitat gains at any time exceeding habitat losses. 	
English Heritage – South West Region	<p>(1) 7d46 Brean Down. The implications of the preferred plan are not known for the Scheduled Monument at Brean Down. It would be more accurate to describe a 'reduction in spatial extent', as described for the 3rd epoch, as loss.</p> <p>(2) P.197 - Alkstone should read Alstone.</p>	<p>(1) The text has been reviewed and amended as appropriate.</p> <p>(2) The text has been amended as suggested.</p>
Sedgemoor District Council	<p>In view of the Council's concerns, we would wish to see the wording of policy units 7d44 and 7d45 amended to include provision for the investigation set-back defences to compare the costs of constructing those defences and associated property loss, with the option of improving the existing defences and adopting a hold the line policy.</p>	<p>Having further reviewed the information available we do not believe a policy to HTL indefinitely along this frontage is correct. We have ensured that the reasoning for this is clearer in the text, although there remains flexibility in approach in the medium to long term in recognition of current uncertainties. It should be noted that the current policy here for 7d44 prior to SMP2 was 'Do Nothing'.</p>
Somerset County Council	<p>We agree there is a need for further detailed study within policy unit 7d44 and 7d45, which includes Berron to Brean Down. In addition we understand that there are many issues which would benefit from exploration and discussion with communities in these areas, including:</p> <ul style="list-style-type: none"> ○ Coastal erosion of the dunes – this currently occurs naturally however it is increased by access routes across the dunes ○ Asset owners backing onto the dunes managing their adjacent land appropriately, in a way that helps support maintenance of the dunes ○ Sustainability of the high number of tourism businesses dependant on the area ○ Sea level rise may mean the beach car park is lost and alternative sites will have to be sought 	<p>We have reviewed the policy statement here and revised wording to be clearer in what more detailed studies should look at to address uncertainty in relation to future flood risk management. We have made mention of the points raised here in the Action Plan. It should be noted that the current policy here for 7d44 prior to SMP2 was 'Do Nothing'.</p>
Environment Agency	<p>7d44 Medium term: consider Hold The Line.</p> <p>The Burnham to Brean Coastal Study (Black & Veatch 2008) draws different conclusions regarding the health of the dune system. Has this report fed into the Plan process?</p> <p>The Black & Veatch report (2009) states that the ancient dune belt behind the smaller frontal dunes will protect to 1:1000 standard, with current sea level rise considered. There are two locations where the standard of protection of the back dune ridge is likely to be reduced in the future:</p> <ul style="list-style-type: none"> • Erosion along a footpath which cuts through the entire dune system. • Caravan site located on top dunes has resulted in lowering of dune ridge. <p>There is no evidence to suggest that removing property from the sand dunes in the medium to long term will allow for the natural evolution of the dune system. Removing potentially stabilising structures from the dune belt may in fact lead to increased erosion at these locations and exacerbate the loss of sand, leading to accelerated breach and overtopping risks.</p>	<p>The SMP has reviewed a range of available information regarding the processes affecting the frontage between Burnham-on-Sea and Brean Down. This includes Futurecoast (Halcrow, 2002), which itself was a large scale review of coastal processes research, the Burnham to Brean Coastal Study by Black & Veatch (2008) and coastal monitoring data from the South-West Regional Coastal Monitoring Programme based at Plymouth Coastal Observatory (PCO).</p> <p>Much of this research has been reviewed and summarised in Appendix C of the SMP documents that were published as part of the consultation draft. However, following comments received the information has been reviewed further and the following summarises the key coastal processes and technical points that have informed selection of preferred policy in this area (note that preferred policy selection was also based on consideration of social, environmental and economic factors).</p> <p>Understanding of Coastal Processes and Flood Risk Management Issues The Burnham to Brean frontage is on the east side of Bridgwater Bay and is comprised largely of sand dunes for much of its length. The sand dunes are comprised of more active fore dunes and older, more stable and higher back dunes. Towards Brean Down there is a large rock revetment and small lengths of privately owned walls and gabions at either end of the revetment. From the point of view of flood risk management, the large</p>

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	<p>In the longer term it is acceptable to provide some set back defences to allow for the adaptation of the coastline but this would still not support the active removal of properties from the dune system. The removal of properties is not an option that has been considered in the past, what evidence has been used to assess the suitability of this approach?</p> <p>The Black & Veatch report (2009) shows that there is no significant change in shoreline position between Brean Down and the Unity Farm area. South from here patterns switch from slight erosion to stable, to accretion and erosion. The Plan suggests a more detailed study is required. Does this mean that the Black & Veatch work needs reviewing, updating or expanding or has it not been taken into account?</p> <p>The realignment options at Berrow And Brean are complicated, particularly when the main risk to the low lying land behind the dunes comes from the left bank of the River Axe. Whilst realignment options will create habitat there is a balance to be made with the needs of the local community and the sustainable future of the area.</p> <p>It is unclear how road access will be maintained to the properties in the next unit to the north (7d45).</p> <p>Text and map policies to not match.</p>	<p>back dunes provide a natural flood defence and are for the most part expansive and unlikely to be compromised as a defence in the next 100 years, even accounting for climate change impacts (Futurecoast, 2002; Black & Veatch, 2008). However, towards the northern end of Brean village, the dune belt is narrower and so the dunes are more likely to be vulnerable to climate change impacts particularly as foreshore narrowing and lowering occurs, which could even result in loss of dune belt in this area in the future. A breach of the dunes along this section could potentially occur in the next 100 years (Futurecoast, 2002) and the effects would be rapid and deep flooding of a large area of hinterland (Black & Veatch, 2008).</p> <p>The long term trends along this frontage have been erosional, with eastwards retreat of dunes. Estimated rates of retreat vary, with Black & Veatch (2008) estimating historical erosion of the shoreline and dune ridge to have been between 0.4 to 0.8m/year whilst the beach area in front of the dunes has been narrowing and lowering at a rate of about 0.6m/year. Analysis of beach profile data from PCO undertaken for the SMP covering the first 2 years of the monitoring programme also shows a net erosion rate along this frontage of between 0.1 and 0.2m/year.</p> <p>Whilst all of the evidence available to the SMP shows a net erosional trend, it is acknowledged that the evolution of the dunes along this frontage is complex and that there have been periods of accretion along parts of this frontage in the near recent past. Black & Veatch (2008) cite the area around Berrow Marshes as an example, where fore dunes formed and accreted between 1967 and 2001 but have since been eroding at a rate of about 2m/year.</p> <p>Erosion along this frontage is thought to be strongly related to periods of westerly wave action (Black & Veatch, 2008). Erosion along the frontage is also controlled by the wide expanse of foreshore and inter-tidal mudflats that currently limit the frequency of storm events that cause recession from reaching the shoreline. This is related to the fact that Bridgwater Bay is a sink for muddy sediments from the Severn Estuary. In the future as sea level rise accelerates it is thought unlikely that the rate of deposition of muds in the inter-tidal area will keep pace with rising sea levels and as such there is predicted to be an increase in the number of storm events that are able to reach the dunes and so cause erosion. Erosion of the dunes has also occurred as a result of human impacts, examples of which are cited in Black & Veatch (2008) where footpath use has caused erosion through an entire dune sequence and construction of a caravan park on top of the dune ridge has resulted in erosion of the dune ridge and lowering of the defence function of the dunes.</p> <p>Analysis of LiDAR data presented in Black & Veatch (2008) of the 0m contour (within the inter-tidal mudflats) and the back of beach line attempts to give an assessment of rates of foreshore change and if there is flattening or steepening of the shoreline. However, having reviewed the data presented we do not believe it is possible to determine how the foreshore area is evolving based on the analysis presented. Therefore, conclusions from this analysis of LiDAR data that suggest little or no change, or even accretion/erosion, of the foreshore, is not considered to be reliable to use to inform understanding of recent coastal changes. Comparison of high water and low water mark changes in the same report are equally unreliable, something acknowledged in the report by Black & Veatch.</p> <p>There is little input of new sand sediment that could be used to build the shoreline naturally as there are few offshore sand resources within the inner Bristol Channel and so there is little material likely to be exchanged with the shoreline (Black & Veatch, 2008; citing Halcrow, 1998 [SMP1]). Rather, patterns of erosion and accretion along the frontage are related to longshore sediment transport and re-working of sediment already on the shoreline, with storm events resulting in re-distribution of sediment along the shoreline. As sea levels rise and the number of storms reaching the shoreline increase, areas where there is a lack of sediment would become especially vulnerable to flooding by overtopping or breaching, particularly if there were a series of successive storm events between which the beach and dunes did not have time to recover. The movement of sediment along the shoreline is driven by short period waves that transport shoreline sediments from north to south and by longer period waves causing north to south (return) transport in the nearshore zone – setting up a clockwise circulation cell between the mouth of the Parrett Estuary and Brean Down (Black & Veatch, 2008). It is unclear exactly what role Gore Sand plays in this circulation system and if sand sediment is stored here before returning north to return to the shoreline towards Brean Down, or if sediment moves from Gore Sand offshore to deeper water and so is removed from the system.</p> <p>To complicate matters in this area, there is also a risk of flooding ‘by the backdoor’ from the west bank of the Axe Estuary. Therefore any future management of the open coast between Burnham and Brean Down needs</p>

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		<p>also to consider this risk.</p> <p>Future Management In order to manage future flood risk along this frontage, Black & Veatch (2008) recommended developing a Dune Management Plan to prolong the life of the dunes as a natural defence by encouraging dune building, including the use of soft engineering techniques. This same Black & Veatch report concluded that use of hard defences, offshore structures, shoreline control structures or beach recharge would not be practical or appropriate management options for the dune frontage. Black & Veatch (2008) concluded that the policy of dune management was effectively one of 'Do Nothing' for 100 years but that the back dunes should be maintained as a defence (effectively 'Hold the Line' of the back dunes).</p> <p>As part of the SMP2 review this has been changed to be a policy of short-term 'Hold the Line' to pro-actively manage the dunes as a natural defence (i.e. effectively hold the line) whilst in the medium to long-term dune management under a policy of 'Managed Realignment' would control the rate of shoreline movement. This change in policy despite the continuation of the same dune management implementation is in recognition that sea level rise will lead to increased pressure for eastwards movement of the dunes and so it will be more sustainable to manage the dunes as a flood defence by allowing them to adapt to a more landward position rather than trying to keep them in their current position.</p> <p>It should be noted that the definition of 'Managed Realignment' is management to control the rate of advance or retreat of the shoreline – this most closely reflects what would happen with dune management. Therefore to suggest that dune management would effectively hold the line in the medium to long term is incorrect.</p> <p>The Black & Veatch (2008) report also determined that the rock revetment towards Brean Down has a long effective life (well into the long-term period considered by the SMP) and that maintenance of this structure to prolong its design life for as long as possible should occur. This report also recognised uncertainties about there being sufficient justification to upgrade the revetment in the long term once it reaches the end of its effective design life. The same report also identified that the short lengths of private walls and gabions have much short effective lives and are likely to become ineffective by the early part of the medium term period (if not sooner).</p> <p>Based upon all of the available information, the SMP2 has recommended the that the policy for the rock revetment section towards Brean Down be one of 'Hold the Line' in the short and medium term, and into the long-term. However, once the structure reaches the end of its effective life (during the long term) that maintenance should cease and that the defence be allowed to deteriorate and fail over time rather than upgrading the defence along its existing line, as to do so will require a much larger structure than at present. This area would also be at risk of outflanking by the landward retreat of the dunes to the south. It is recognised that to facilitate this there will need to be a structure in a set-back (more sustainable) position to reduce flood risk to the wider area of the Somerset Levels once this revetment is allowed to fail in the long term.</p> <p>However, replacement of short lengths of walls and gabions, particularly to the south of the revetment where they impact more upon the dune system should be discouraged as this would be contrary to the long term plan for the area to realign and work more with natural processes. Rather management here should change to be in line with the dune management/soft engineering approach advocated along the dune frontage.</p> <p>Along the dune frontage, pro-active dune management will aim to prolong the life of the dunes as a natural defence for as long as possible. However, it is recognised that human impacts on the dunes, as well as a lack of natural sediment in the wider coastal system to aid dune development, both serve to currently limit the availability of sand to allow dunes to provide as robust a natural defence as they could do. Therefore, as part of the medium to long term 'managed realignment' of the dunes, it has been identified in the SMP that in areas where the dunes are narrow it may be necessary at a point in the future to remove structures, including properties, from the dune ridge in order to maximise the amount of sand available in the system to achieve the aim of the policy. Even then, it remains uncertain as to how sustainable this will be in terms of providing robust levels of defence for the wider hinterland of the Somerset Levels. As sea levels rise and more storms reach the shoreline and cause erosion, the fore dunes will likely erode and expose the back dunes to more erosional pressure; ultimately where the dunes area narrow this could result in a breach.</p>

Comments from?	Comments	Action/Response
		<p>To address this future risk, a set back defence line would likely be required at a point inland behind the dunes. Here the policy would not be to 'hold the back line of the dunes' as suggested by Black & Veatch (2008) as to do that would imply a hard defence structure along the dunes. This would be both inconsistent with the SMP policy in the long-term for the revetment towards Brean Down, as well as be contrary to the Black & Veatch (2008) assessment that construction of hard structures along the dune belt is inappropriate. A set back defence would provide protection to most of the hinterland whilst also allowing the dunes to respond more naturally to sea level rise by adapting and moving eastwards.</p> <p>In addition to the management approach for the open coast between Burnham and Brean Down, the future risk of flooding 'by the backdoor' from the west bank of the Axe Estuary also needs to be considered. In the long term once the revetment defence on the open coast towards Brean Down is allowed to deteriorate and fail, the west bank of the Axe would be exposed to more coastal energy. The options here would therefore be:</p> <ol style="list-style-type: none"> 1. to upgrade the west bank of the Axe to coastal standards in the long term as a set back defence line required to reduce flood risk from the open coast once the maintenance of the revetment towards Brean Down is withdrawn. Any such structure would need to be integrated with a set back defence that is predicted to be required to reduce flood risk behind the dune area where dunes are already narrow and most vulnerable. 2. to maintain the Axe Estuary defences for as long as there are defences along the open coast, but withdraw defences from the west bank of the Axe at the same time as on the open coast and reduce the risk of 'backdoor' flooding from the Axe through a new defence line (though likely to be the same position as the set back defence for the long term to manage risk once the revetment is allowed to fail). 3. to realign along the west bank of the Axe Estuary in the medium term to create inter-tidal habitat in this area in advance of the revetment on the open coast being allowed to fail in the long term. This option would also require a set back defence position and could form a medium term management in advance of the situation set out in (2). <p>The consultation draft of the SMP identified (2) above as being the most appropriate long-term policy for the west bank of the Axe Estuary, although recognising that there is a need for much greater study along the frontage to derive how best to implement the policies in this area.</p> <p>Changes to SMP Policy from Consultation Draft Based upon the further review of all information along this frontage, it is felt that the policies are broadly correct, although the long term policy for the Axe Estuary West Bank and the revetment frontage towards Brean Down is to be changed to 'Managed Realignment' to make it clearer what is intended in terms of requiring a set-back defence position as part of the future management of this area. Suggestion will also be made in the medium term to the possibility of implementing managed realignment along the Axe Estuary west bank in that period.</p> <p>The only other change along the frontage will be to the position of the policy unit boundary towards Burnham-on-Sea (boundary between 7d43 and 7d44) which will be moved south to the boundary of the hard defences at the north end of Burnham sea front and the dunes. This is in line with the Black & Veatch (2008) management units and will better reflect the different nature of the frontages.</p> <p>The policy statements in this area have been reviewed and updated to attempt to make the policies clearer.</p> <p>We have reviewed and revised policy unit maps to ensure the text and maps are consistent.</p>
Environment Agency	<p>7d45 The Burnham to Brean Coastal Study (Black & Veatch 2008) draws different conclusions regarding the health of the dune system. Has this report fed into the Plan process?</p> <p>The Black & Veatch report (2009) states that the ancient dune belt behind the smaller frontal dunes will protect to 1:1000 standard, with current sea level rise considered. There are two locations where the standard of protection of the back dune ridge is likely to be reduced in the future:</p>	Refer to comments above in relation to 7d44.

Comments from?	Comments	Action/Response
	<ul style="list-style-type: none"> Erosion along a footpath which cuts through the entire dune system. Caravan site located on top dunes has resulted in lowering of dune ridge. <p>There is no evidence to suggest that removing property from the sand dunes in the medium to long term will allow for the natural evolution of the dune system. Removing potentially stabilising structures from the dune belt may in fact lead to increased erosion at these locations and exacerbate the loss of sand, leading to accelerated breach and overtopping risks.</p> <p>In the longer term it is acceptable to provide some set back defences to allow for the adaptation of the coastline but this would still not support the active removal of properties from the dune system. The removal of properties is not an option that has been considered in the past, what evidence has been used to assess the suitability of this approach?</p> <p>The Black & Veatch report (2009) shows that there is no significant change in shoreline position between Brean Down and the Unity Farm area. South from here patterns switch from slight erosion to stable, to accretion and erosion. The Plan suggests a more detailed study is required. Does this mean that the Black & Veatch work needs reviewing, updating or expanding or has it not been taken into account?</p> <p>The realignment options at Berrow and Brean are complicated, particularly when the main risk to the low lying land behind the dunes comes from the left bank of the River Axe. Whilst realignment options will create habitat there is a balance to be made with the needs of the local community and the sustainable future of the area.</p>	

Brean Down to Anchor Head – 7e01 to 7e06

Comments from?	Comments	Action/Response
Parents Concerned About Hinkley	The Severn Barrage contract could presumably contribute to containment policies for flooding in Weston-super-Mare.	We agree that a barrage scheme could provide a defence role in the future; the extent would, however, depend upon the location and design of the barrage. However, much more work is needed to assess the pros and cons of a Severn tidal power scheme before the government can reach a decision on whether to go ahead with a scheme and if so, which scheme and on what terms. It was not, therefore, considered appropriate for the SMP to pre-guess outcome of these studies.
Resident of Weston-super-Mare	<p>The present works add obvious protection to this sector but there has been a lack of communication over plans and end product causing disquiet among some residents.</p> <p>The proposed original works have expanded to take in a bigger area than we were told but we presume the grant money remains the same—thereby suggesting some of the original plan might have been cut out to pay for the newer plans.</p> <p>The works seems first class, visually splendid, but raising the esplanade leaves the sea wall dangerously low (beneath knee level for most).</p> <p>I am old enough to know that the only genuine judgement on this must await the next tidal surge.</p> <p>ANY OTHER COMMENTS: The import of Jn Main the artist has made a vast improvement to the impact.</p>	The SMP policy is to maintain the recent works at Weston-super-Mare. These comments relate to the recent scheme here and should be directed to North Somerset Council. No other action is required
Sedgemoor District Council	pg 219, medium term performance policy, policy unit 7E02 refers to Combwich - this is nowhere near the area referred to. I imagine there has been a 'cut & paste' that has gone a bit wrong.	The text has been corrected.

Comments from?	Comments	Action/Response
Avon Wildlife Trust	<p>(1) 7e02 – 7e04 - The Trust supports the policies to hold the line, in the medium to long term from studies which suggested that managed realignment may not be appropriate along the Eastern Bank of the River Axe. We support this approach due to the presence of the Avon Wildlife Trust Reserve at Walborough which is also designated as an SSSI because of its limestone pavements. The policies will also provide benefits to the Severn Estuary SSSI, SAC, SPA and Ramsar site by creating new intertidal habitat areas.</p> <p>(2) 7e05 – 7e06 - The Trust supports the short term proposed management, whilst strongly supporting the ongoing monitoring of the effectiveness of the dunes as a sea defence. Concerns are raised over the potential loss of sand dunes between Uphill and Weston-Super-Mare, as fixed sand dunes are protected under the EC Habitats Directive. The Trust recognises that there may be little or no alternative at this site, so it is recommended that habitat creation is planned elsewhere as compensation.</p> <p>(3) The Trust supports the overall long term plan on the basis that the plan provides sustainable protection to limit the risk of flooding to the North Somerset Levels and Moors.</p>	<p>(1) Noted. No action required.</p> <p>(2) The issue of compensatory habitat needs to be investigated as part of a more detailed in the future. This has been mentioned in the AA</p>
West Mendip Internal Drainage Board	<p>Whilst the board is not directly affected by the SMP, we feel that it is important that neighbouring SMP areas maintain contact and provide opportunities for consultation.</p> <p>In this instance the neighbouring Policy Unit in the Severn Estuary SMP (KIN4) is essentially high ground and hard geology which naturally limits the risk of coastal erosion and there is therefore no significant linkage with the adjacent Policy Units of the North Devon and Somerset SMP (7e01 to 7e06).</p>	No action required.
English Heritage – South West Region	<p>7e02-7e04 Managed realignment in this area (and the Severn Estuary in general) is likely to cause damage to buried deposits of archaeological significance.</p>	This risk has been added to the implications tables.
RSPB	<p>(1) 7e02, 7e03, 7e04, 7e05, 7e06 The Appropriate Assessment (AA) recognises that in these policy units, where the proposed policies include <i>hold the line, sea level rise will result in the progressive loss of intertidal and supratidal habitats</i>. The SMP and AA appears to suggest that since policies for managed realignment will create new intertidal habitat, and that the total potential for new intertidal habitat exceeds predictions for habitat losses to coastal squeeze, the SMP policies will not have an adverse effect on the integrity of the Severn Estuary Special Protection Area, Special Area of Conservation and Ramsar site.</p> <p>However, as set out in our response letter, creating new habitats outside of the designated site boundary cannot be considered as Regulation 48(6) <i>mitigation</i>. The plan must therefore be considered to adversely affect the integrity of the N2K sites. Consequently, to be approved, it must meet the tests of Regulation 49 (there being no alternative solutions and imperative reasons of overriding public interest). If these tests are met, the provision of new intertidal habitat outside the boundary of the N2K sites would in our view be required as <i>compensatory measures</i> to meet the Regulation 53 requirement <i>to ensure that the overall coherence of Natura 2000 is protected</i>.</p> <p>Compensatory measures should be secured before a plan that would adversely affect the integrity of a N2K site can be adopted. To give the necessary level of assurance, we believe that the SMP must commit to the following:</p> <ul style="list-style-type: none"> • Predicting, identifying and monitoring habitat losses resulting from SMP policies for specific N2K habitats. • Replacing habitat losses in a functionally like for like manner, at least on a 1 to 1 basis. • Maintaining an audit, or balance sheet, for each habitat type, of (i) N2K Site habitat losses resulting from SMP policies and (ii) N2K site habitat gains. 	<p>(1) Refer to above response to RSPB comments - Updated HRA issued to EA 7/5/10, addressing all issues identified in these comments. Further amendments may be required following further consultation with NE / CCW..</p> <p>(2) Defra guidance advises that policies should be discussed in the three epochs. It is not the intent that these epochs should constrain actions, should recommended studies be undertaken earlier. The short term policy to HTL is to give time for studies to occur and also reflects the residual life of existing defences. MR could occur earlier if detailed studies show it is appropriate to do so. No further action required.</p> <p>(3) The linkages along this frontage, means that the policy in this unit is in support of the policy on the open coast to the west. This is why MR here was not recommended. No further action required.</p>

Comments from?	Comments	Action/Response
	<ul style="list-style-type: none"> Habitat gains at any time exceeding habitat losses. <p>(2) 7e03, 7e04, 7e05 We welcome the policies for managed realignment in these Policy Units, to create new areas of intertidal habitats, however we question the deferral of this policy to the Medium term, with hold the line the short term policy. We accept that the Severn Estuary Flood Risk Management Strategy will provide the detail needed to determine exact locations and nature of opportunities for managed realignment. However, we believe that broad areas that are considered to have potential for realignment should be identified in the SMP and that work to progress them should be undertaken in the short term in order that they can be implemented when this work is complete. The policy would appear to defer the implementation of managed realignment opportunities for at least 20 years, which in our view is an excessive delay.</p> <p>(3) 7e02 We question why the policy for this unit is not Managed Realignment, to create new areas of intertidal habitats.</p>	
Natural England	<p>7e01-06.</p> <p>(1) Role of sand dunes as primary protection: the dune system is not wide, but is a single line formed over the last century. Given the prediction for sea level rise in the Long-term Epoch, it seems unlikely that the dunes will continue to provide a primary line of defence far into the future. The long-term need for managed realignment should be stated less equivocally.</p> <p>(2) Reference to Comwich under Medium Term in Summary of Specific Policies for 7e02 (page 219)?</p>	<p>(1) Having reviewed the text and supporting information the policy for all three epochs at unit 7e05 has been changed to Managed Realignment. This is to allow more pro-active dune management and earlier implementation of a secondary defence line if monitoring shows it to be required. MR is the policy as it is defined as management to control the rate of advance or retreat of the shoreline. This most closely reflects what dune management would achieve.</p> <p>(2) The text has been corrected.</p>
Environment Agency	<p>7e02 Text for the medium term states 'minimise flood risk to Comwich'.</p>	We have corrected the text.
Environment Agency	<p>7e03 The Severn Estuary FRM Strategy may add more detail to the Axe and its right bank towards Uphill. The River Axe itself is controlled by Brean Cross Sluice and as such does not function as a naturally flushing river. How does the proposed Managed Realignment contribute to flood storage?</p>	We have revised the text following provision of further information from the Severn Estuary FRM Strategy to include mention of a recent small scale regulated exchange scheme to create habitat to the south of Uphill within the Axe Estuary. We have also reviewed and amended the statement about flood storage, recognising that realignment here would mainly be for habitat creation benefit.
Environment Agency	<p>7e04</p> <p>(1) This unit contains a caravan park and golf club. Whilst this area may provide suitable habitat (depending on actual sea level rise rates and the subsequent MLW levels) it results in a loss of leisure and holiday facilities that play a part in the economic sustainability of the area.</p> <p>(2) How does the proposed Managed Realignment contribute to flood storage?</p>	<p>(1) We have revised the text to clarify what that MR potential exists in this area, but where later detailed study shows it not to be practical to implement MR then the policy will be to HTL. We have also revised the implications tables to ensure that the amenity aspects raised here are adequately reflected in the plan.</p> <p>(2) We have revised the text following provision of further information from the Severn Estuary FRM Strategy to include mention of a recent small scale regulated exchange scheme to create habitat to the south of Uphill within the Axe Estuary. We have also reviewed and amended the statement about flood storage, recognising that realignment here would mainly be for habitat creation benefit.</p>