

## **Appendix 2 - Public Examination**



**EAST  
ANGLIA  
COASTAL  
GROUP  
SUB-CELL 3C**

**SHORELINE MANAGEMENT PLAN SUB-CELL 3C  
LOWESTOFT NESS TO FELIXSTOWE LANDGUARD POINT**

**SMP3C PUBLIC EXAMINATION**

**CONSULTATION REPORT**

**v1.2**

**6<sup>th</sup> November 2009**

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## **SMP3C PUBLIC EXAMINATION CONSULTATION REPORT**

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### **1 INTRODUCTION and SUMMARY**

- 1.1 The preparation of a Shoreline Management Plan (SMP) is the responsibility of the operating authorities responsible for managing the coastline. In Suffolk these organisations are Suffolk Coastal District Council (SCDC), Waveney District Council (WDC), British Energy (BE) and the Environment Agency (EA) – in association with Natural England (NE) and Suffolk County Council (SCC):
- 1.2 The first generation Shoreline Management Plan for the Suffolk coastline, between Lowestoft and Felixstowe, was completed in 1998, covering a length of coastline of approximately 72 km. This SMP is now being reviewed by Royal Haskoning UK Ltd for Suffolk Coastal District Council as lead authority for the operating authorities. Terry Oakes Associates Ltd (TOAL) is project managing the development of the new SMP on behalf of SCDC.
- 1.3 One important aspect of the SMP Review is a wide and comprehensive public consultation to obtain their views and to examine proposals during the process of determining the appropriate policies.
- 1.4 The Consultation measures also include the establishment of the Representative Members Forum (RMF) and the Key Stakeholder Forum (KSF) which assist the Officers' Client Steering Group (CSG) in developing the draft SMP in advance of it being made available for the public consultation. The Client Steering Group has prepared an Engagement Plan to steer this aspect of the review.
- 1.5 In late March/early April 2009, a series of workshops for key stakeholders was held at three locations in the area. All key stakeholders were invited to sessions which explained the approach used to review the issues and to seek their comments/feedback on the draft management policies. Comments were analysed and changes made to the Draft SMP in the light of them.
- 1.6 The Public Consultation phase then ran from July 1st to 30th September 2009. Six public exhibitions (or drop-in sessions) were held at six locations along the coast, attended by CSG officers with a view to informing attendees about the plan and seeking their comments. People were also invited to view the Draft SMP and make comments via the website. Copies of the Draft SMP were additionally placed in relevant public libraries for examination.
- 1.7 This report consists of the record of the comments made by participants both during the exhibition sessions and in subsequent written and verbal communications.
- 1.8 This is the final consultation stage of the process.

## **2 THE CONSULTATION PROCESS**

### **2.1 EXHIBITIONS**

2.1.1 A series of six events were held to show the proposed draft management policies for the Suffolk coastline. Each session focussed on one (or two adjoining) Policy Development Zones (PDZs) – although materials for the complete coastline were available for discussion at all sessions. Appendix 1 contains the full exhibition programme.

2.1.2 182 key stakeholders, groups and organisations were invited to send representatives to any or all exhibitions. A programme of posters, media events and media releases publicised the events to the wider public.

2.1.3 Each meeting was attended by Members and officers of the Partner organisations, along with representatives from Terry Oakes Associates Ltd, who are project managing the review, and Royal Haskoning (RH), the Consultants undertaking the review.

### **2.2 PURPOSE OF EXHIBITIONS**

2.2.1 The defined purpose of the exhibitions was to provide the general public with an opportunity to:

- (1) review the process used to identify possible policy options for the management of the Suffolk coastline;
- (2) examine the proposed draft policies for each policy zone;
- (3) ask questions of the experts.

2.2.2 The aim was to explain the approach used to review the issues, identify potential policy options and how the preferred option was selected – taking into account technical and social implications, so that stakeholders felt they know enough about what we have done to be able to question our approach and the outcome. In addition, the project team were aiming to show that they were prepared to listen and to change the draft policies – and not to defend the decisions to date.

2.2.3 Their comments/feedback were requested to help us validate our work so that we can develop the final draft management policy options.

### **2.3 WHAT WAS PRESENTED?**

2.3.1 The project team emphasised that they were presenting how they had identified the preferred options for comment and that they were not presenting the final draft options.

2.3.2 All attendees were advised that the draft SMP policies for the Suffolk coastline were available for downloading from a public area on the website [www.suffolksmp2.org.uk](http://www.suffolksmp2.org.uk) as well as at public libraries along the coast.

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2.3.3 The documents are referred to as Policy Development Zone statements (PDZs). There are seven PDZs covering the Suffolk Coastline:

PDZ1: Lowestoft to Benacre Ness

PDZ2: Benacre Ness to Easton Broad

PDZ3: Easton Broad to Minsmere

PDZ4: Minsmere to Thorpeness

PDZ5: Thorpeness to Orford Ness

PDZ6: Orford Ness to Cobbold's Point

PDZ7: Cobbold's Point to Landguard Point

### **2.4 EXHIBITION ARRANGEMENTS**

2.4.1 Each event was run as an unstructured session, in which attendees were welcome to arrive at any time. A series of display boards was erected, explaining the SMP process and showing the maps for the area in question. All maps for other areas in the SMP, as well as both volumes of the complete Draft SMP, were laid out on tables for examination if required.

2.4.2 On arrival, each attendee was:

- welcomed and given leaflets explaining the SMP process and an explanation of the various display boards, as well as a questionnaire sheet which they were encouraged either to complete on the day or send in later;
- encouraged to ask questions of the experts.

2.4.3 Great attention was paid to ensuring that all attendees who wished to spent some time with one or more of the experts did so.

### **2.5 ATTENDANCE AT EXHIBITIONS**

<b>Venue</b>	<b>PDZs</b>	<b>Date</b>	<b>Time</b>	<b>Attendance</b>
Kessingland	1, 2	7 <sup>th</sup> July	2 – 6 pm	75
Southwold	2, 3	4 <sup>th</sup> July	12 – 5 pm	41
Walberswick	3	8 <sup>th</sup> July	2 – 7 pm	77
Aldeburgh	4, 5	17 <sup>th</sup> July	11 am – 7 pm	106
Hollesley	6	16 <sup>th</sup> July	2 – 7 pm	36
Felixstowe*	7	18 <sup>th</sup> July	10 am – 2 pm	56

\*held jointly with an exhibition about the Felixstowe Town Beach project



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### **3 PRESS and MEDIA EVENTS**

- 3.1 A full programme of media releases and events was arranged to publicise the consultation, both at the start of the consultation period and also as a refresher during the early weeks of September. Appendix 4 includes the full schedule of events.

### **4 REPORTS TO COUNCIL**

- 4.1 Suffolk Coastal District Council Cabinet received a comprehensive report on the preparation of the draft SMP at its meeting on 1 September 2009 when it is supported the policies within the document.

### **5 OTHER EVENTS**

- 5.1 Other publicity about the consultation was presented as and when opportunities arose, as detailed in Appendix 5.

### **6 WEB SITE**

- 6.1 The SMP2 website ([www.suffolksmp2.org.uk](http://www.suffolksmp2.org.uk)) contained full details of the consultation process, including:
- downloadable copies of all sections of the full Draft SMP;
  - the libraries at which copies of the full Draft SMP had been placed for inspection; and
  - The exhibition schedule.
- 6.2 The site also allowed respondents to complete an online form with their comments and send these directly to the consultation team.

### **7 EMAILS TO STAKEHOLDERS**

- 7.1 All stakeholders identified in the Stakeholder Consultation phase were written to or emailed with details of the Public Consultation, including details of the website and the exhibition schedule.

## **8 COMMENTS RECEIVED**

### **8.1 Receipt of Comments**

8.1.1 Comments were received as formal responses after the workshops, either on questionnaire forms or as letters or emails.

8.1.2 82 comments were received in total: 64 as questionnaire responses; 18 as letters or other submissions.

8.1.3 A legal challenge to the SMP process has also been received from Parkinson Wright solicitors and is being dealt with externally to the consultation process.

### **8.2 Questionnaire Responses**

8.2.1 Each comment or set of comments received has been given a unique and sequential reference and entered into a database. All comments are listed in Appendix 8, which has been published as a separate document.

### **8.3 Other Correspondence**

8.3.1 Some correspondents elected to make comments outside the questionnaire framework. These have published separately as Appendix 9.

### **8.4 Analysis of Responses**

8.4.1 Haskoning UK performed an analysis of each comment received and a proposed action for the Final SMP. This analysis has been published separately as Appendix 10, which consists of 9 PDF documents, covering each PDZ plus General comments and comments about the Draft SMP appendices.

8.4.2 Appendix 6 (in this document) also provides a graphical analysis of the responses, showing both the support or otherwise for the proposals and also a demographic analysis of respondees.

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**APPENDIX 1: VENUES, DATES AND TIMETABLE**

<b>Policy Development Zone</b>	<b>Section of Coastline</b>	<b>Venue</b>	<b>Date</b>	<b>Start time</b>	<b>Finish Time</b>
1, 2	Lowestoft to Easton Broad	Kessingland Village Hall	7 <sup>th</sup> July 2009	2 pm	6 pm
2, 3	Benacre Ness to Minsmere	Southwold, Stella Peskett Millennium Hall	4 <sup>th</sup> July 2009	12 am	5 pm
3	Easton Broad to Minsmere	Walberswick, Suffolk Coast & Heaths Centre	8 <sup>th</sup> July 2009	2 pm	7 pm
4, 5	Minsmere to Orford Ness	Aldeburgh Church Hall	17 <sup>th</sup> July 2009	11 am	7 pm
6	Orford Ness to Bawdsey Manor	Hollesley Village Hall	16 <sup>th</sup> July 2009	2 pm	7 pm
7	Felixstowe Ferry to Landguard Point	Felixstowe Town Hall	18 <sup>th</sup> July 2009	10 am	2 pm

## **APPENDIX 2: KEY MESSAGES**

### **Setting the scene**

Suffolk Coastal District Council, Waveney District Council, the Environment Agency and other partners will work together with the community to make sure that everyone is aware of the effects of living and working in our dynamic coast.

We need a plan to help us deal with and manage change. We will involve people in the future of their coast and to increase their understanding of the potential options in terms of maintaining defences in a changing climate.

We have a continually changing low-lying coastline and people living and working here face increasing flood risk. This plan will show us how to manage this risk both in the short and long term.

Over the next 100 years sea level is likely to rise by up to 1 metre. This means the coast will inevitably change.

### **What is the Shoreline Management Plan (SMP)?**

The Suffolk SMP will identify the current situation on our coast and then consider how best to manage coastal flood and erosion risk for the future.

It is a strategic plan about how the Suffolk shoreline will be managed over the next 100 years.

It will show us how we can best manage increasing flood and erosion risk on the coast.

### **Who is involved in shaping the plan?**

Those who have coastal management responsibilities from Lowestoft Ness to Felixstowe Landguard Point are working together in partnership to shape the plan.

Suffolk Coastal District Council, Waveney District Council and the Environment Agency, other partners and communities will work together to make sure that everyone is aware of flood risk and to involve them in the future of their coast. We will take every opportunity to raise their understanding of what their options are in terms of maintaining defences in a changing climate.

Working together we will make sure everyone is aware of both the risks and opportunities arising from a changing coastline.

### **How will it reflect the needs of those who enjoy, live or work on the coastline?**

We will involve those with an interest in the coast and raise awareness of the risks and opportunities that a changing coastline might bring.

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We will work with everyone, sharing local knowledge, to help develop a joint approach to managing change.

We want the plan to support and enhance people's enjoyment of the coast and work with the changing nature of the coast to maximise the social and economic benefits.

We want the plan to support and enhance people's enjoyment of the coast by maintaining and improving access.

### **How will we involve people?**

We will involve the community and stakeholders early on in the process. We will be honest and open and will make every effort to avoid raising false expectations.

### **What happens next?**

We will balance the interests of coastal users and look at approaches to managing flood and coastal erosion risk that allow us to adapt to the changing coast.

We will work together with communities to explore different approaches to managing the impacts of our dynamic coastline and adapting to climate change.

We will look at how we can work together to explore different approaches to managing flood risk and adapting to a changing coastline

We want to support people's ability to live work and enjoy the Suffolk coast.

### **Overarching key messages**

Suffolk has a dynamic, continually changing coast. The low-lying nature means that people living and working in areas which are currently at flood risk will face increasing challenges in the future.

The Suffolk Shoreline Management Plan allows us to consider how best to manage flood and coastal erosion risks from Lowestoft Ness to Felixstowe Landguard Point.

Suffolk Coastal District Council, Waveney District Council and the Environment Agency are working together with a range of partners, organisations and local groups to shape the plan for Suffolk. Working together we will make sure everyone is aware of both the risks and opportunities arising from a changing coastline.

We will work together with local stakeholders to balance the interests of coastal users to ensure we support local people's ability to work on, live near and enjoy the coast.

We will involve those with an interest in the coast and raise awareness of the risks and opportunities that adapting to a changing coastline might bring.

The SMP will be reviewed periodically, enabling the plan to adapt to changing circumstances and improvements in the science.

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### APPENDIX 3: CSG ATTENDANCE AND ROLES AT EXHIBITIONS

NAME	Southwold	Kessingland	Walberswick	Hollesley	Aldeburgh	Felixstowe
	4 Jul	7 Jul	8 Jul	16 Jul	17 Jul	18 Jul
John Jackson	-	√	√	-	-	-
Gary Watson	-	√	-	√	-	-
Stuart Barbrook	√	-	√	-	-	-
Mike Steen	-	-	√	-	pm	√
Sharon Blease	√	-	√	-	pm	-
Mark Johnson	√	-	-	-	-	-
Amy Capon	-	√	-	-	-	-
Sue Brown	-	√	-	-	am	-
Isi Dow	-	-	-	√	am	√
Paul Patterson	√	√	-	-	-	-
Julie Hood	-	√	-	-	-	-
Bill Parker	-	√	√	√	√	-
Bob Chamberlain	-	-	√	√	√	-
Greg Guthrie	√	√	√	√	√	√
Stefan Lombardo	√	√	√	√	√	√
Terry Oakes	√	√	√	√	√	√
Alan Hallett	√	√	√	√	√	√

√      Attending  
 -      Not attending  
 am     11 am to 3 pm  
 pm     3 pm to 7 pm

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### APPENDIX 4: MEDIA EVENTS

Date	Event	Media	Who
1-Jul-09	Press Briefing (Lowestoft)	EDP, Beach Radio	M Johnson/ P Paterson
1-Jul-09	Press Briefing (Felixstowe)	Felixstowe Star, EADT	M Johnson/ Cllr Smith
1 <sup>st</sup> wk July	Radio Interview	Radio Suffolk	Cllr A. Smith
1 <sup>st</sup> wk July	Radio Interview	Radio Suffolk	MJ (EA)
1 <sup>st</sup> wk July	Article	Coastline	V Hotten
7-Sep-09	Radio interview	BBC Radio Suffolk	TO (TOAL)
11-Sep-09	Press Article	Coastal Advertiser, p.3	V Hotten

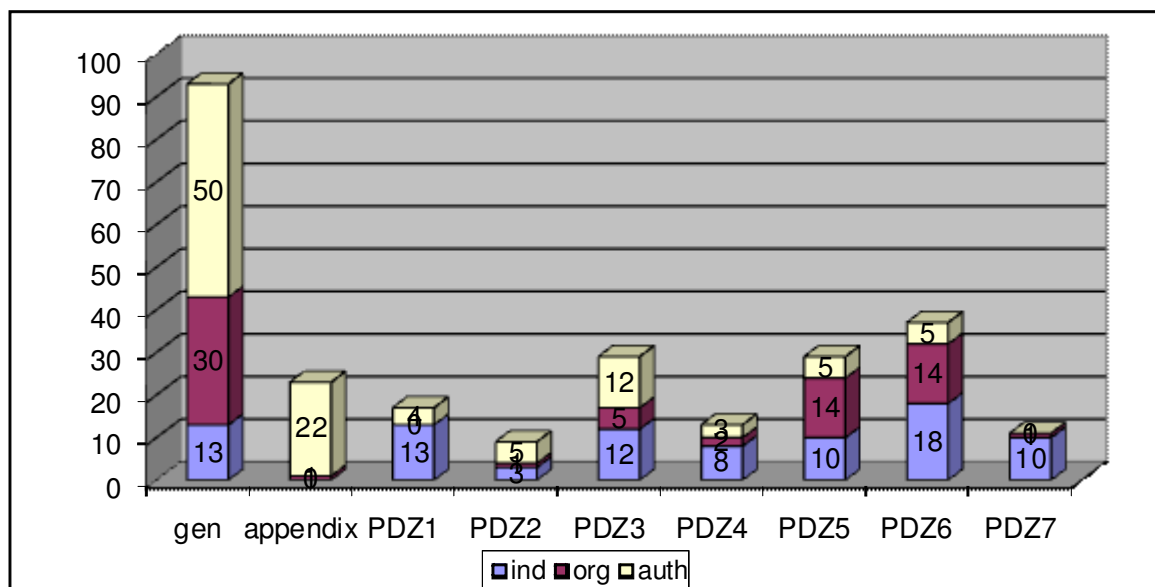
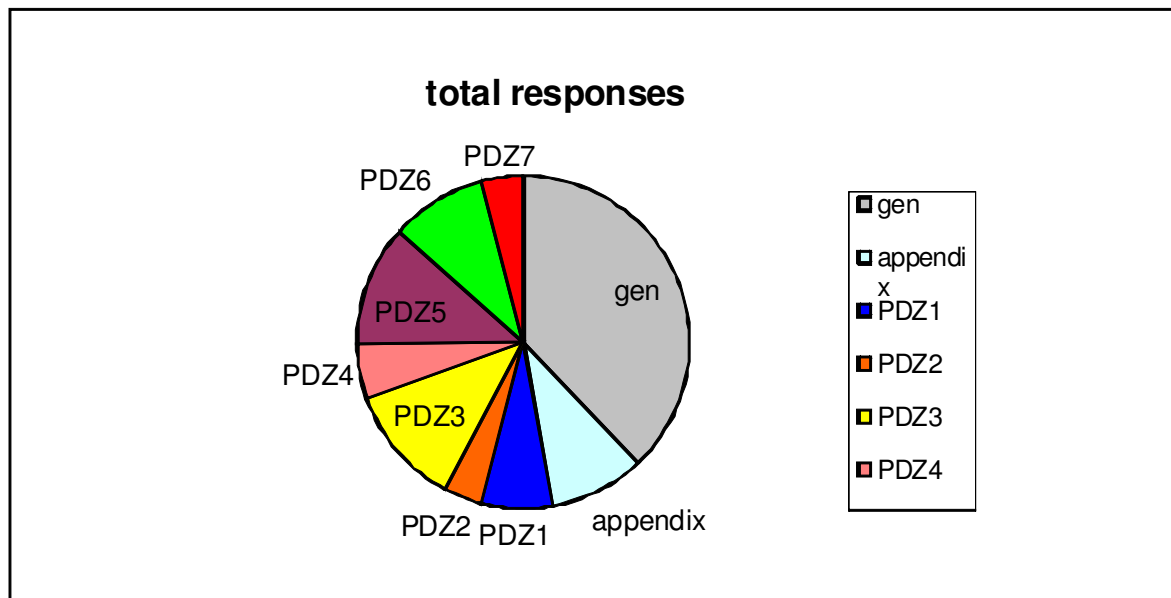
**APPENDIX 5: OTHER EVENTS**

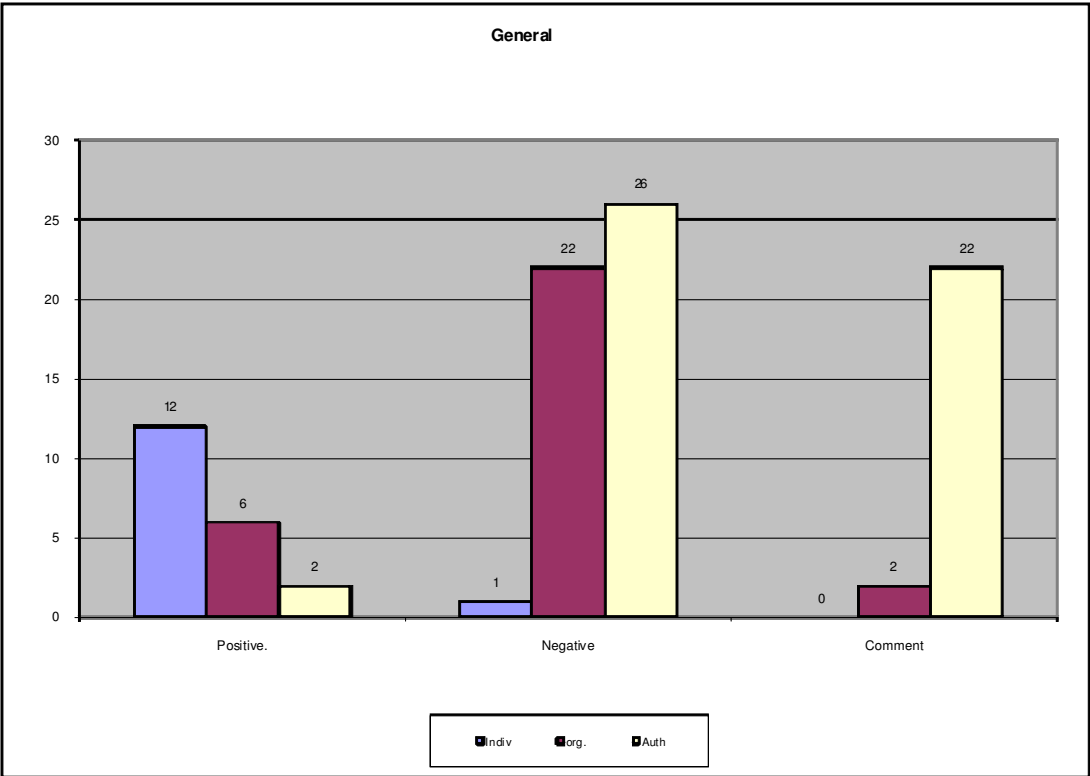
<b>Date</b>	<b>Event</b>	<b>Involvement</b>	<b>Who</b>
4-Sep-09	Alde & Ore Futures Community Conference at Snape Maltings	Display of Alde/Ore maps and other materials; Comment made about SMP review during proceedings by TO.	TO (TOAL)
18-Sep-09	Briefing with Bob Blizzard, MP for Waveney	One-to-one meeting about SMP draft policies for the coastline north of the Hundred River, Kessingland	TO (TOAL)
23-Sep-09	Kessingland Parish Council	Response to a request for discussion on the SMP2 proposals for low lying parts of Kessingland, including the sewage pumping station.	KT (TOAL) GG (HUK) PP (WDC)



## APPENDIX 6: GRAPHICAL ANALYSIS OF QUESTIONNAIRE RETURNS

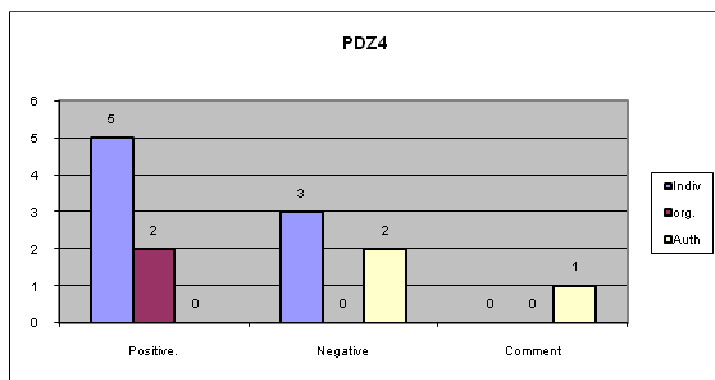
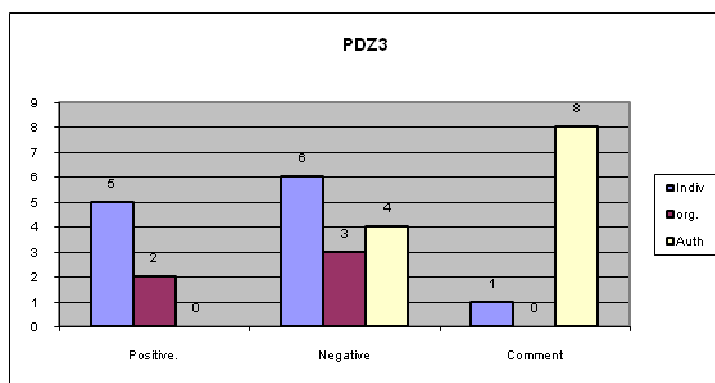
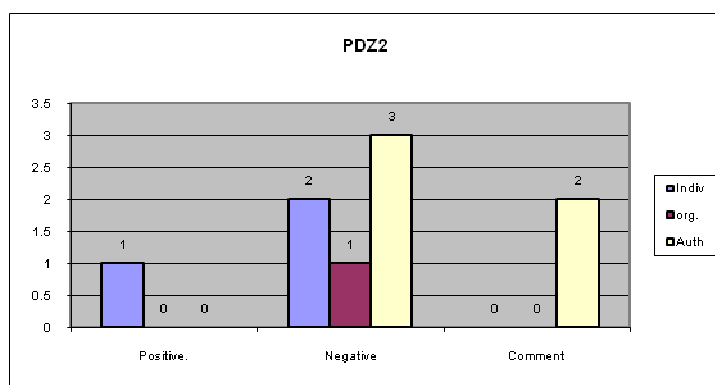
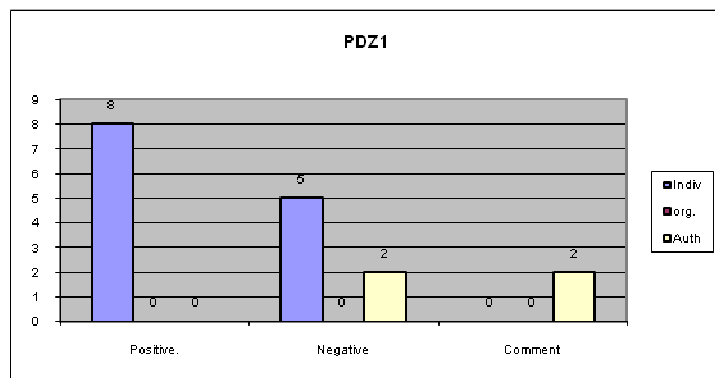
### General Analysis



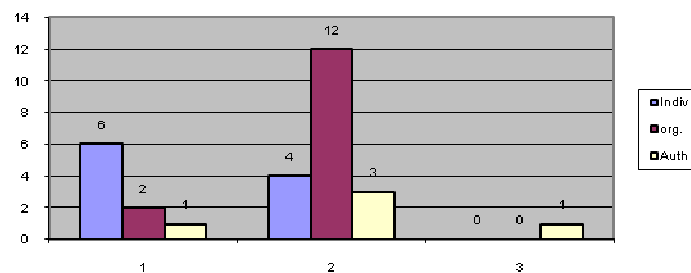


## ***Analysis by PDZ***

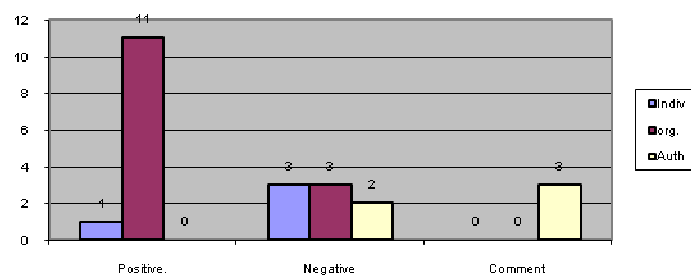
Responses were analysed in three groups (Individuals, Organisations and Authorities) to indicate whether the response was positive or negative and whether comments were also made.



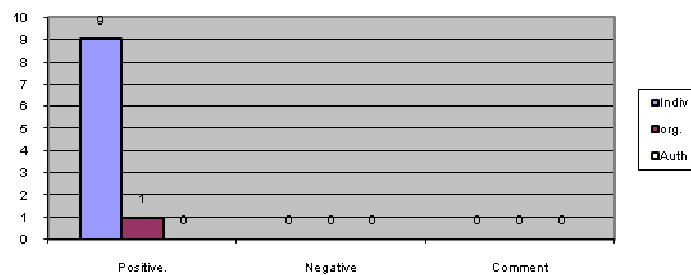
**PDZ5**



**PDZ6**



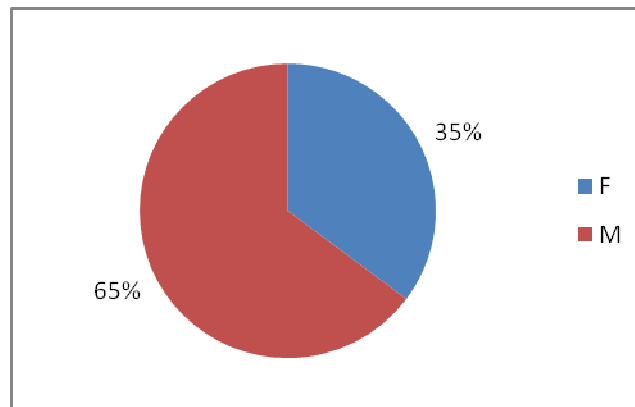
**PDZ7**



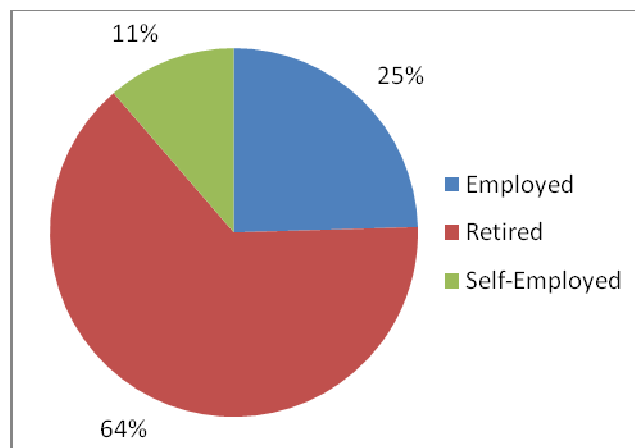
### ***Demographic Analysis***

Respondents who returned questionnaires were also asked to indicate their gender, age group, employment status and ethnicity. The following charts indicate the breakdown of all responses made in each group, excepting 'Rather Not Say' responses.

#### **Gender**



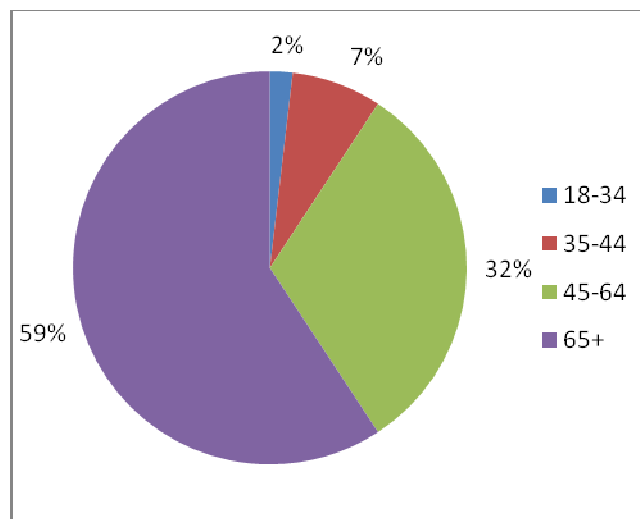
#### **Employment Status**



Other available responses were:

Unemployed  
Student

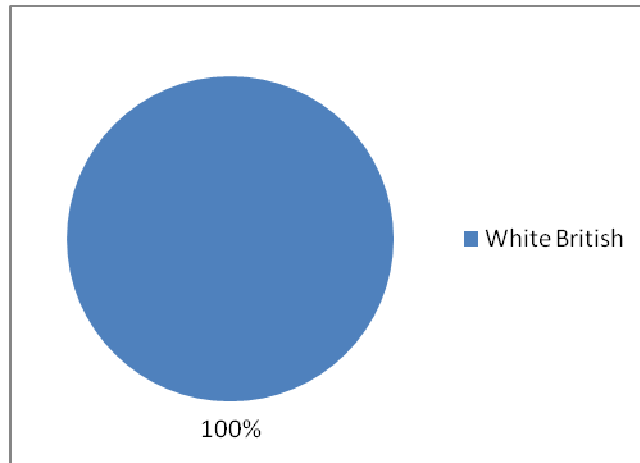
### Age Group



Other available responses were:

Under 18

### Ethnicity

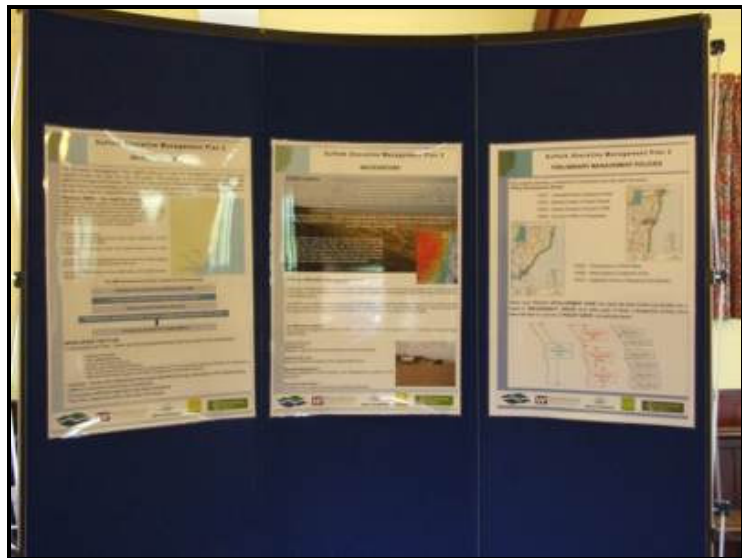


Other available responses were:

White Other	Indian
Black – British	Pakistani
Black – Caribbean	Bangladeshi
Black – Asian	Chinese
Black – Other	Any Other

**APPENDIX 7: PICTURES AT AN EXHIBITION**







00001

PDZs

PDZ6 PDZ7

MA

PU

**General Comments:**

Recent experience with beach promenade and even a building washed away seem to indicate no SMP prior to this exercise and nothing by any other name. This has led to gross errors, listed over, and in some cases waste of money perhaps worthy of audit commission investigation

**Your Comments:**

Why is there no space for specific comments? Eg1 - the 3 attempts to repair the footpath by the golf course are all hopeless. One was too small and too deep, another was too large and angular and the third too large. All 3 were dangerous to many types of users as any simple risk assessment would illustrate. This is money wasted. Please alert the Audit Commission to respond to myself. Eg2 - If public money is being spent on sea defences, the public should have a right of access over them. (See Parliamentary Bill.) What are you doing to negotiate access over the South End defences and those north of Cobbolds Point? Eg3 - The plethora of signs attached to the sea wall towards Landguard are an eyesore. If kids had spray-canned it, there would be an uproar. Remove all but one at each end and change the law! Eg4 - Why has it left the beach north of Cobbolds Point inaccessible except at low tide - why do we still have this gap in the timing of continuous access?

**Do you agree with what the SMP is trying to deliver?**

I agree that it is high time this issue was high on the priorities of all parties concerned. However, a fog of jargon and poor presentation, inconsistencies and other faults make much of your effort meaningless., sadly.

**Do you agree with the proposed policy?**

See above. Eg why has the concrete just north of Cobbolds Point already disintegrated? How long has it been there? Not long enough surely?

**Has the consultation been useful? Yes**

but it is light years away from being either satisfactory or acceptable, for the reasons above

**Have you had the opportunity to discuss your issues? Yes**

**Have the discussions been useful? Yes**

but only as an initial exchange of views and explanation of decisions already made. Therefore it is not a 'consultation', simply an explanation'.

**00002**

**PDZs**            PDZ1   PDZ2   PDZ3   PDZ4   PDZ5   PDZ6   PDZ7

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

Coastal Chart's tidal flows offshore dredging and changes of tidal flows. Any changes off shore line will have effects. Also coast charts should read maritime charts.

**Do you agree with the proposed policy?**

Not enough protection off coast. Time line is too long, work should start now! Floods off 1953 should have taught a lesson.

**Has the consultation been useful?**    Yes

**Have you had the opportunity to discuss your issues?**    Yes

**Have the discussions been useful?**    No

Left me feeling frustrated and scared for future of Kessingland and area.

Appendix 8: Questionnaire Responses

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00003

PDZs PDZ1 PDZ2 PDZ3

MA

PU

**General Comments:**

It would appear that a decision to sacrifice land has been taken without really considering the effect on the area concerned

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?**

Because various dwellings and the magnificent church at Covehithe will be lost to the sea.

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Did not say

**Have the discussions been useful?** Did not say

00004

PDZs PDZ2

MA

PU

**General Comments:**

The SMP Plan of no active intervention have ignored the problem of flooding on the main A12 route, also like PDZ2 is in an area classified by Natural England as a SSI area. It may be helpful to look at the schemes in Norfolk e.g. The rock reefs at Happisburgh which seems to be successful

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

Possible loss of the A12 at Benacre marshes which has already been flooded several times due to Benacre Pumping Station unable to discharge the River Hundred at high water. Same problem Potters Bridge on B1127.

**Do you agree with the proposed policy?**

Cost cutting exercise.

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** No

**Have the discussions been useful?** Did not say

00005

PDZs

PDZ5

PDZ6

MA

PU

**General Comments:**

There are some unknowns in the SMP, one major one is the implications of a breach at Slaughden. This would alter predictions for sediment etc in that zone, also affect the behaviour of the shingle spit at East Lane. The Slaughden question appears to be bringing on a certainty, it is a matter of when and how this is managed.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver? Yes**

Our area in PDZ6/7, this is quite straightforward especially due to the acceptance of East Lane as a fait accompli. It is unclear what is likely to happen to the cliffs immediately south and the effect upon East Lane and Bawdsey Manor.

**Do you agree with the proposed policy? Yes**

This SMP strikes me as a moderate and considered document. It acknowledges control within uncertainty and goes to lengths to accommodate community perception.

**Has the consultation been useful? Did not say**

**Have you had the opportunity to discuss your issues? Yes**

**Have the discussions been useful? Yes**

but there will be some impact from the Estuarine Strategies that could change the short/long term SMP.

Appendix 8: Questionnaire Responses

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00006

PDZs PDZ1

MA

PU

**General Comments:**

A very thorough process which is essential to inform the Action Plan. I visited the Walberswick exhibition and was grateful to be given a CD of the SMP. This enabled me to examine the plan in detail in my own time. (I'm not on broadband.) I intend to lend the CD to others to enable them to respond to the SMP. It appears to have been a thorough process with reports from specialists in all the various areas (geology, estuaries, habitats etc). I await the Action Plan with interest - please would you ensure that this is publicised?

**Your Comments:**

This is an exceptionally varied and beautiful stretch of coastline which is subject to constant change through the various processes examined in the appendices to the SMP. I would like to make three points:

1. This subcell should be managed as a whole entity because of the interaction between the various PDZs (e.g. erosion/deposition)
2. Minimum intervention should be a guiding principle - it would be easy to spoil the coastline by over-zealous intervention which would not be financially sustainable.
3. It is important to manage it as a 'living' entity safeguarding wildlife and human interests.

**Do you agree with what the SMP is trying to deliver?** Yes

Nothing about funding! This may influence its implementation. Presumably will be addressed by the Action Plan.

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

I would like to ensure that I receive a CD or hardcopy of the Action Plan.

**Have you had the opportunity to discuss your issues?** Did not say

The representatives at Walberswick were very helpful. I happened to be working at Walberswick, otherwise I would have missed the consultation.

**Have the discussions been useful?** Did not say

I would like to be notified of any future opportunities (either paper or in person) to discuss the Action Plan when this has been formulated.

Appendix 8: Questionnaire Responses

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00007

PDZs

PDZ6 PDZ7

MA

PU

**General Comments:**

The Town council welcomes the SMP process which is an essential tool for coastal management.

**Your Comments:**

The Town council welcomes the policy for the Felixstowe frontage (PDZ7) and endorses the policy for the mouth of the Deben (PDZ6).

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Did not say

**Have the discussions been useful?** Did not say

**00008**

**PDZs**

**MA**

**PU**

**General Comments:**

I know this is a high-level plan, but at some point we need to know what exactly 'managed realignment' means in particular places.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes



00009

PDZs

PDZ5

MA

PU

**General Comments:**

A brave attempt to prepare for the uncertainties of the future of our coastline. As an amateur in these matters, i can only urge consistency of approach in specific areas.

**Your Comments:**

Section Brackenbury Cliff to Cobbold's Point. To extend the promenade eastward round the point is an excellent, if expensive, proposal. But to stop at Jacob's Ladder is silly: the retaining wall on the remaining section to Brackenbury is only 200 yards but is in very poor state and is exposed. If not done at the time of the proposed works, it will have to be done properly soon after to avoid scour and collapse of the cliff at the bottom of the Golf Rd properties.

**Do you agree with what the SMP is trying to deliver?** Yes

With reservations. I did not have time to examine documentation at the Town Hall exhibition and wonder whether the consultants had considered the effects of constant shipping channel dredging on shoreline material levels.

**Do you agree with the proposed policy?**

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

**00010**

**PDZs**

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

## 00011

<b>PDZs</b>	<b>PDZ3</b>
<b>MA</b>	WALB
<b>PU</b>	WALB

### General Comments:

Robinsons Marsh. I understand that the river wall be maintained for 20 years. I also hear that wall heightening will be the last phase from Tinkers to the ferry. Surely this must be tackled first to protect those at the Lea. And where is tidal protection for Old Vicarage Cottage? Please remember that all these houses were badly flooded in 1953. Loss of human life has to be more important than bird protection.

### Your Comments:

I met Adam Burrows of the Heritage Hut at Walberswick - he did his best to explain the recommendations. Most proposals seem sound. Only serious concern is for the Robinsons Marsh area. There was talk of a wall continuing across the road past Old Vicarage Cottage and across the marsh - tucking into the Old School Fields. I hope tis idea has not been thrown out. Generally yes, but protection of east end of Robinsons Marsh properties is paramount.

Accompanying letter: If the river walls are to be heightened and, we hope, the Robinsons Marshes will remain dry at the highest tide, there remains a problem. The tide will encroach from the quay up the road and surely will rush to fill up the marsh between Marsh View and Old Vicarage Cottage, possible undermining the buildings. The answer to this is to continue the earth wall across the road with a tidal gate and join the wall from the Ferry Hut.

### Do you agree with what the SMP is trying to deliver? Yes

Yes and No. I believe in fully serviced - heightened flood protection banks - apart from the shingle sea bank which I agree is unsustainable.

### Do you agree with the proposed policy?

No. See above.

### Has the consultation been useful? Yes

### Have you had the opportunity to discuss your issues? Yes

### Have the discussions been useful? Yes

00012

**PDZs** PDZ4  
**MA** Sth of Frt Green, Aldeburgh  
**PU**

**General Comments:**

A lot of excellent work has been carried out and I agree with most of the proposed plan. However, I am concerned about the area to the south of Aldeburgh.

**Your Comments:**

I am concerned that the possibility of permitting a breach of the river to the sea at Slaughden could be disastrous with unforeseen side effects which would change the economics of the River Alde at Aldeburgh. I think it essential that the shoreline south of Fort Green be stabilised on an ongoing basis.

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?**

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

## 00013

**PDZs**            PDZ1   PDZ2   PDZ3   PDZ4   PDZ5   PDZ6   PDZ7

**MA**

**PU**

### **General Comments:**

We need a national integrated plan to deal with rising sea levels and fewer consulting quangos that only delay matters beyond reason. Time is of the essence, action is needed to prepare for the effects of global warming.

### **Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

If you mean by agreement, its assessment of flood risk then yes.

**Do you agree with the proposed policy?**

It appears a political fudge. Reference to maintaining current positions are hollow without assured funding. To try (to) save parts of the coastline alone will not be cost effective in the longer term and it is not being very honest.

**Has the consultation been useful?** Yes

Insofar as it highlights danger areas and makes us aware of the longer policy (undeclared), that due to political prevarication funding will not be available for a cohesive long term plan.

**Have you had the opportunity to discuss your issues?** Yes

but only to the extent that the plan covers. The wider issues are 'out of bounds'.

**Have the discussions been useful?** Yes

but the intended proposals are disappointing insofar as the whole truth is not openly discussed.

**00014**

**PDZs** PDZ1

**MA**

**PU**

**General Comments:**

As a resident of Kessingland I was surprised how few of my neighbours knew about the Shoreline Management Plan

**Your Comments:**

The information was OK as far as it went. However, it was not detailed enough and rather vague.

**Do you agree with what the SMP is trying to deliver?** Yes

The situation in Kessingland is not detailed enough.

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

Everyone was most helpful.

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

As far as it goes. We need more information.

00015

PDZs

PDZ6

MA

PU

**General Comments:**

Sub Cell 2C. There is confusion in the defined objectives. Some are not concerned with shoreline management. How do you propose to: to maintain biological and geological features ... To support (a weasel word) the adaption of local communities to maintain the core heritage values of the area (what are they?)

**Your Comments:**

Although it may be politically difficult some attempt should be made to define the key areas of threat and the priorities to be attached to each one. On the entire coast I assume that the Slaughden Beach is the most vulnerable. What about the sea wall and inside wall at Minsmere? How does Walberswick rate against the above two areas?

**Do you agree with what the SMP is trying to deliver? Yes**

The key issue is available funding - if there is no money to be had the entire project becomes an intellectual exercise. It would be helpful if you were able to pay (word unclear) by e.g. 2025

**Do you agree with the proposed policy?**

The following projects will have been completed. The statement of policy does not go far enough.

**Has the consultation been useful? Did not say**

**Have you had the opportunity to discuss your issues? Did not say**

**Have the discussions been useful? Did not say**

**00016**

**PDZs**

**PDZ7**

**MA**

**PU**

**General Comments:**

I would like to have the original geo-physical survey reports of 'Posford' in the 1980s, who rebuilt our cliff i.e. bore-hole analysis for hidden aquifers behind the cliff face. Slip-circle survey for stability coefficients.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes



00017

**PDZs** PDZ1  
**MA** Pakefield to Kessingland  
**PU**

**General Comments:**

The SMP does not make any comments on how the cost of defences is to be funded i.e. From Central Government, Local District or if Parish Councils can help via the rate (word not clear) or key local people whose property is affected.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

The maps are several years out of date. There is no indication of the expected movement north of Benacre Ness.

**Do you agree with the proposed policy?** Yes

The 20-year window to protect southern Kessingland should be used in insure funding is available for its defence.

**Has the consultation been useful?** Yes

The officers were helpful and well-informed with a positive attitude to the defence of Kessingland.

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

Parish Councils and local people whose property is at risk should be informed on an ongoing basis.

**00018**

**PDZs**

**PDZ4**

**MA**

**PU**

**General Comments:**

Overall, the scheme is a well thought-out proposal prepared by competent scientists and engineers, who have considered a wide variety of possible future events.

With particular reference to PDZ4, have the Planners considered the effects of future sea-level rise in the Sizewell area. The new nuclear reactor will be required to operate until 2050+. Earlier replacement of Sizewell 'C' would be particularly expensive.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

00019

PDZs PDZ2 PDZ3

MA

PU

**General Comments:**

Letter to follow

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

No. Accurate analysis of projected erosion rates on this area, as the past projections are far in excess of the in the SMP.

**Do you agree with the proposed policy?**

No. It doesn't fulfill its original objects in relation to human habitat at Easton Bavents. It makes no provision for projected private sea defence at Covehythe. There is no public advantage in encouraging the ness to advance further westwards. It is already in its next protecting position

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Did not say

Further discussions required.

**Have the discussions been useful?** Yes

I appreciate the changes between draft 7 and 8 in relationship to Easton Bavents but do not agree with future policy.

Appendix 8: Questionnaire Responses

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**00020**

<b>PDZs</b>	PDZ1
<b>MA</b>	Kessingland Beach area
<b>PU</b>	KES 2,3,4

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

**00021**

**PDZs**

**PDZ4**

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

Appendix 8: Questionnaire Responses

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**00022**

**PDZs**      PDZ1   PDZ2

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**   Yes

**Do you agree with the proposed policy?**

     Much more hold the line needed

**Has the consultation been useful?**   Yes

     Very

**Have you had the opportunity to discuss your issues?**   Yes

     Very

**Have the discussions been useful?**   Yes

     Very

Appendix 8: Questionnaire Responses

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**00023**

**PDZs** PDZ1  
**MA** Carlton Colville  
**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Yes

Thank you

**Have the discussions been useful?** Yes

**00024**

**PDZs**

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

Very as we live in the area

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes



00025

PDZs PDZ3 PDZ4

MA

PU

**General Comments:**

I found the first review of SMP sub cell 2c to be comprehensive and in several areas authoritative. However, on a 50-year timescale, unless funds are made available in the region of £2 bn+ I do not think defences of Southwold or Aldeburgh are feasible as proposed and there are also long-term implications for the defence of present and future power stations at Sizewell.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

Up to a point but I do not think the funding and political implications have been fully considered.

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

Appendix 8: Questionnaire Responses

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00026

PDZs

PDZ5

MA

PU

**General Comments:**

Dredging should be stopped.

According to this plan Sizewell will become an island which I feel is dangerous.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

No. Maps out of date.

**Do you agree with the proposed policy?**

No. Sizewell will become an island.

**Has the consultation been useful?** No

Not really

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Did not say

**00027**

**PDZs**

**MA**

**PU**

**General Comments:**

(Comments made to Stuart Barbrook)

Drainage through sea wall/promenad of flood water - Brudenell end. Clearance of (word unclear) needed. Wave action overtopping wall should be able to drain back rather than flooding of High Street. Jetting of town drains needed - should not be stopped.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

**Do you agree with the proposed policy?**

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Did not say

**Have the discussions been useful?** Did not say

00028

PDZs PDZ4  
MA Aldeburgh  
PU

**General Comments:**

**Your Comments:**

Interesting but rather complex.

**Do you agree with what the SMP is trying to deliver?** Yes

I think so! Financial consideration not on the display - I have not read the whole plan

**Do you agree with the proposed policy?** Yes

But will it be implemented e.g. Money

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

**00029**

**PDZs**

**MA**

**PU**

**General Comments:**

The proposal for my area (Aldeburgh) is good in principle. BUT: I would need an assurance that local or central government support, practical and financially, is given such that the SMP can be implemented.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?**

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Did not say

**00030**

**PDZs**

**PDZ5**

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

The SMP is correct in defining the range of interests (stakeholders) but it offers no way in which conflicting interests can be resolved.

**Do you agree with the proposed policy?**

Not clear what the proposed policy is. The SMP offers a series of possible actions but does not indicate how the conflicting interests can be lead to an agreed plan.

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

Appendix 8: Questionnaire Responses

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**00031**

**PDZs**

**PDZ5**

**MA** 14

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

Appendix 8: Questionnaire Responses

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00032

**PDZs** PDZ1 PDZ2 PDZ3 PDZ4 PDZ5 PDZ6 PDZ7

**MA**

**PU**

**General Comments:**

I am a teacher at Leiston High School. We study in detail the local coastline from Key Stage 3 up to A level. Any further information about the planes and coastline with any available resources would be greatly appreciated!

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

Vey much so.

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes



**00033**

PDZs	PDZ4	PDZ5	PDZ6
MA			
PU			

**General Comments:**

Teacher at local high school - any information about SMP gratefully received - coastal processes and management taught at GCSE and GCE geography. Students specifically study this coastline.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Did not say

**Have the discussions been useful?** Did not say

Appendix 8: Questionnaire Responses

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**00034**

**PDZs**

**PDZ5**

**MA**

End of Leiston Rd, Aldeburgh

**PU**

**General Comments:**

Helpful and reassuring

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

Appendix 8: Questionnaire Responses

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**00035**

**PDZs**

**PDZ7**

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

As far as I can understand.

**Has the consultation been useful?** Did not say

Interesting but not useful

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

**00036**

**PDZs**

**PDZ7**

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

**00037**

**PDZs** PDZ4 PDZ5

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

00038

PDZs PDZ4  
MA Dunwich cliffs to Sizewell  
PU

**General Comments:**

Even at this stage, there seems inadequate joined-up consultation/thinking between EA; British Energy/EDF ; RSPB ; National Trust; land and property owners to establish the full breadth of the impact of anticipated coastal degradation.

**Your Comments:**

The decision will be driven by financial factors and political sensitivities. For this area with low population (vote) levels the National interest factors need to be considered.

**Do you agree with what the SMP is trying to deliver? Yes**

Indicative cost benefit studies should be included as effect the national economy/politics i.e. Sizewell nuclear site, (waste strategy/'B' power generation/'C' future site), RSPB, Minsmere substitution costs, tourist area (substituting overseas travel/trips etc.)

**Do you agree with the proposed policy?**

No. Until indicative cost/benefits are established which indicate other priorities "hold the line" should be the policy.

**Has the consultation been useful? Did not say**

Helpful to concentrate minds on the present EA thinking.

**Have you had the opportunity to discuss your issues? Yes**

**Have the discussions been useful? Did not say**

Marginally so

Appendix 8: Questionnaire Responses

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00039

PDZs

PDZ7

MA

PU

**General Comments:**

Process appears to be well handled, although seeking funding from national fund sounds uncertain.

**Your Comments:**

<Responder offered comment about Felixstowe beach scheme - not entered here>

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

**00040**

**PDZs** PDZ1

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

Very

**Have you had the opportunity to discuss your issues?** Yes

And it has been very helpful to speak to those who know about these things. I am especially interested in Benacre Ness and its movement north over the past 50 years.

**Have the discussions been useful?** Did not say



Appendix 8: Questionnaire Responses

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**00041**

<b>PDZs</b>	PDZ1
<b>MA</b>	Kessingland beach area
<b>PU</b>	KESS 2,3,4

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

**00042**

**PDZs** PDZ1

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

In part. Would need much longer study time to give fully formed opinion.

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

00043

PDZs

PDZ5

MA

ORF 15

PU

**General Comments:**

The plan seeks to address the risks of (in my area) flooding. The issue is only will the policy increase flood risk (result - neutral); the issue MUST BE how to REDUCE flooding risk. This is not mentioned in the plan, but most certainly should be.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver? Yes**

Whilst I broadly agree with the objectives of the plan, I think more emphasis should be placed on the potential ramifications for the people rather than the natural habitat. The Environmental lobby has been allowed to be too dominant.

**Do you agree with the proposed policy?**

No. It is vital that there is no breach at Slaughden at any time in the future. The Alde/Ore estuary must remain secure as it is at present.

**Has the consultation been useful? Yes**

**Have you had the opportunity to discuss your issues? Did not say**

**Have the discussions been useful? Yes**

00044

PDZs

PDZ4 PDZ5

MA

PU

**General Comments:**

If the Environment Agency/Government are not prepared to save our coastline then permission should be given to local residents to do it themselves. It isn't just the towns that need preserving but the whole habitat along the Suffolk coast.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

**Do you agree with the proposed policy?**

No. I think the coastline should be preserved as much as possible as it is in 2009.

Strengthening the shore by fencing (Dunwich) and placing soft groins (Dunwich) has made a difference and the cost is minimal compared with hard defencing. Also possible would be using old tyres. Forming or strengthening existing sand/shingle banks is effective too.

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Did not say

**Have the discussions been useful?** Did not say

00045

PDZs

PDZ6 PDZ7

MA Deben entrance to Landguard Point  
PU

**General Comments:**

I am very supportive of the proactive approach taken to manage the coastline from the Deben entrance to Landguard Point. It is vital for the economic and social future of Felixstowe that the present shoreline is held and moreover that the present very dilapidated state of the defences and amenities from the war memorial to Landguard Point are tackled in a similar way to the successful South Beach works of 2008. Perhaps the SMP needs to emphasise the absolutely vital need to implement the now proposed Central Felixstowe defences within the next few years if Felixstowe is to remain economically viable.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver? Yes**

Cross reference to present proposals for new Central Defences in Felixstowe would seem to be needed as these appear to supersede comments in the SMP and the SMP therefore appears out of date in not taking these proposals into account.

Also 2003 Halcrow report to SCDC was very critical of the performance of the fishtail groynes - this is not really picked up in the SMP which seems to accept them at face value.

It is very important the Felixstowe Ferry is fully protected as it is an integral part of the tourist attraction of the resort.

**Do you agree with the proposed policy? Yes**

Agree - but would like to see work on fishtail groynes advanced to say 5 - 10 years time (ie to allow time to see effect of now proposed revetment wall).

Also the report focuses a little too much on the blue flag south beach as the principal tourist amenity for Felixstowe - in fact the beaches from the Spa Pavilion to Cobbold's point are far more popular with families and it is vital that proper investment is made to protect them.

**Has the consultation been useful? Yes**

**Have you had the opportunity to discuss your issues? Did not say**

**Have the discussions been useful? Yes**

00046

PDZs PDZ1 PDZ2 PDZ3 PDZ4 PDZ5

MA

PU

**General Comments:**

In general I find these proposals disturbing, defeatist and negative e.g. in no instance is there a proposal to advance the line. I think the general policy should at least be to hold-the-line. I also disagree with the wishful thinking associated with Managed Retreat. For example, No Active Intervention or Managed Retreat at Easton Bavants, the Blyth Estuary, Dunwich, Minsmere will make the area surrounding Southwold and Sizewell (including the nuclear power stations) not viable. Transport links, a unique coastline and the recreational activities will be compromised and destroyed. In summary I think the Precautionary Principle should be adopted pending developments in environmental sciences and the fight against the affects of man-made global warming. We should be positive and not defeatist.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

No. I think the proposed policy of Managed Retreat is not honest or viable. There will be too many unforeseen consequences in letting segments of the coast go, re Southwold, the Blyth Estuary and Sizewell - see my comments above.

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

It has made me think about the coastline and the factors that will affect its future

**Have you had the opportunity to discuss your issues?** Did not say

**Have the discussions been useful?** Did not say

00047

PDZs PDZ1 PDZ2 PDZ3 PDZ4 PDZ5 PDZ6 PDZ7

MA

PU

**General Comments:**

The minimum requirement is to "Hold the Line", we are already an overcrowded Island and it is not acceptable to loose more land. For this some joined up thinking is required and two strategies deployed.

Shoreline erosion would be reduced, probably to manageable levels, if the impact of wave attack were reduced. This could be achieved by having Wave active power generators sited off shore. These are currently only at the development stage but should be available within the next two decades. These will generate electricity by extracting power from the waves. This in turn reduces the effect of the waves on the shore line and so reduces erosion.

The Rivers should be surge protected at their entrance. It is nonsense to try and protect the entire length of all the vulnerable rivers. This could be done by installing tidal flow generators coupled with suitable locking facilities for ships. With surge protection it is only necessary to delay the peak at the entrance to smooth out the effect inside the river.

Both these solutions are engineeringly possible. It only requires the political will to finance them.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

**Do you agree with the proposed policy?**

**Has the consultation been useful?** No

I doubt it. It is not proper consultation and I doubt if my proposals will be taken into account.

**Have you had the opportunity to discuss your issues?** Did not say

**Have the discussions been useful?** Did not say

Appendix 8: Questionnaire Responses

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00048

PDZs	PDZ3
MA	Easton Bavents
PU	Easton Lane

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?**

No. The maintenance of the defenses at Southwold rely on their effectiveness on the erosion of the Easton Bavents cliffs. These cliffs support my home at Four Winds, Easton Lane. I can see why the maintenance of numerous properties in Southwold should take preference over maintenance of a few at Easton Bavents. However, the fact remains that my home will be sacrificed for the benefit of others. If this is to be the case, what rcompense can I expect for this sacrifice? In the end I may become homeless, possibly at an advanced age. Will I be eligible for re-housing under the current procedures? Thank you.

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** No

**Have the discussions been useful?** Did not say

N/a



00049

PDZs

PDZ5

MA

PU ORF 15.1

**General Comments:**

There appears to be fundamental flaw in the manner in which the future of our coasts and estuaries is planned. Either proper estuary plans should be organised to be in place before an SMP is produced (so that it can take account of all the relevant issues) or, in their absence, an SMP should be tasked with itself identifying all the relevant issues necessary to properly determine the policies for the shoreline, no matter how remote from the shoreline the origin of some of the issues may turn out to be. To propose a policy which could have a significant impact on a population living a considerable distance behind a shoreline without first having fully understood the nature of that impact seems slipshod in the extrem (positively 'out of character' with the remainder of the SM). To then entrust or commit the review of that policy to a process (the ICZM), admitted by all and sundry to be experimental (i.e it may not happen), seems to me to be neither tenable or responsible.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

No. The SMP makes reference on PDZ 5:3 to the presence of Snape Maltings at the head of the Alde or Ore Estuary - I am not entirely clear why ... Because thereafter I can find no further mention of Suffolk's premier tourist attraction. "The stakeholder objectives" clearly indicate Snape Maltings has no "stake" in the SMP as its supreme cultural and heritage value is not recognised by the Plan which does not in any way bother itself with the implications for the Maltings of a breach at Slaughden.

**Do you agree with the proposed policy?**

No. Even though the policy is passive - because it is premature. To have a policy at this stage of the consideration for the Alde & Ore is to put the cart before the horse. Frank Duent of Royal Haskoning has said with ref to the ICZM that it is important NOT to start with a plan - but the SMP is starting the process with a plan.

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

But only vaguely.

**Have the discussions been useful?** No

Not really, because none of the so-called experts have properly and fully researched the issue to which I refer.

Appendix 8: Questionnaire Responses

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00050

<b>PDZs</b>	PDZ3
<b>MA</b>	Southwold - North of the pier
<b>PU</b>	

**General Comments:**

I am in favour of "Hold the Line". My view is that the only threat to the Town Farm Marshes (to the north of Southwold Town) would come from a failure to maintain the sea defences between Easton Bavents cliffs and the sea wall to the north of Southwold Pier.

**Your Comments:**

Also see letter.

**Do you agree with what the SMP is trying to deliver?** Yes

However it is important that the beach levels are maintained and that the rock groynes and their effectiveness is regularly monitored. I do not agree that the properties in North Road, Southwold are in a major Flood Risk Area.

**Do you agree with the proposed policy?**

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** No

**Have the discussions been useful?** Did not say

**00051**

**PDZs**

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

00052

PDZs PDZ1 PDZ2 PDZ3 PDZ4 PDZ5 PDZ6 PDZ7

MA

PU

**General Comments:**

While I do not have a house perched on a cliff, I do feel that this matter of coastal protection is most important on this side of the UK and that although at the moment it does not seem economic to protect farming land we may get to the stage when any land will be at a premium.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Yes

At Walberswick

**Have the discussions been useful?** Yes

I am interested as a result of working as a volunteer at the Education dept of the National trust at Dunwich Heath

00053

PDZs

PDZ7

MA

PU Waldringfield

**General Comments:**

It would be helpful if Waldringfield PC had a representative included in the process.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver? Yes**

We would have preferred more detail on the financial costs/benefits which are mentioned. There is no assessment of the area up River Deben from Ramsholt to Woodbridge. This is necessary.

**Do you agree with the proposed policy?**

We are solely concerned with the area from Bawdsey to Felixstowe. We reluctantly support the "hold the line" policy. We cannot comment on the are upriver (Deben) at Waldringfield as this is not shown on the plan.

**Has the consultation been useful? Yes**

**Have you had the opportunity to discuss your issues? Yes**

Via a representative from Woodbridge.

**Have the discussions been useful? Yes**

Yes - prompted discussion of this important issue.

00054

PDZs

PDZ6 PDZ7

MA

PU

**General Comments:**

The SMP was generally accepted by the Committee. However it was commented on that a Plan incorporating Estuaries and Shoreline would be an improvement. It was also noted that no study was made of the effect of the Orwell Estuary on the adjacent Felixstowe Shoreline.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver? Yes**

Investigation of the effect if any of the Orwell Estuary and its dredged deep water channel on the Felixstowe sea front. Felixstowe is a resort and unsightly and dangerous rock groynes do not aid tourism and reduce beach access. Future defence plans should consider this.

**Do you agree with the proposed policy? Yes**

One reservation was the increased probability in the Deben Estuary (p 46, PDZ 6 on pdf document). Another reservation was the treating of Estuaries & Shoreline separately.

**Has the consultation been useful? Did not say**

**Have you had the opportunity to discuss your issues? Did not say**

**Have the discussions been useful? Did not say**

Appendix 8: Questionnaire Responses

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**00055**

**PDZs** PDZ2

**MA**

**PU**

**General Comments:**

**Your Comments:**

Also see letter

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?**

No

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** No

**Have the discussions been useful?** Yes

Not sure - if there is the real possibility that the SMP will be revised in the light of the consultation responses - then yes.

00056

<b>PDZs</b>	PDZ3
<b>MA</b>	BLY09, DUN 11
<b>PU</b>	BLY10.1, DUN11.1, DUN11.2

**General Comments:**

Representing:  
Walberswick Parish Council  
Walberswick Common Lands Charity  
Walberswick Sea Defence Group

**Your Comments:**

**Do you agree with what the SMP is trying to deliver? Yes**

Proposed DIY measures to maintain flood banks in the Blyth Estuary have not been fully taken into account. Also, no mention is made of the proposal from the Walberswick Sea Defence Group that an existing small inner bank between Walberswick and Dunwich should be built up to provide addition protection to the National Nature Reserve.

**Do you agree with the proposed policy?**

No. Overall the SMP2 preferred policies are far more palatable than thos eproduced by the Environment Agency for thew Blyth Estuary and the Walberswick to Dunwich frontage. Nevertheless it is believed that SMP2 needs to be challenged on the policy to withdraw maintenance from Tinkers marsh flood banks from the present day and in the medium term from the bank protecting Robinson Marsh. Should these marshes flood then the affect of the additional water flow on navigation and on the harbour mouth structures will be very damaging.

Given that it is intended to maintain the harbour mouth structures and the line of the south training arm, the maintenance of the dunes on the Walberswick side is very important. The policy for these dunes is "managed retreat" but at present there is no management at all and they are being damaged by too many "vistitors".

**Has the consultation been useful? Did not say**

Although one appreciates what the SMP is trying to deliver, one seriously questions whether views and aspirations of local stakeholders has been properly included. These should been established at the start of the process and consultants charged with providing explanations as to why they were unachievable.

**Have you had the opportunity to discuss your issues? Did not say**

**Have the discussions been useful? Did not say**



**00057**

**PDZs** PDZ3 PDZ4  
**MA**  
**PU** Dunwich

**General Comments:**

Dunwich Parish Meeting welcomes the recognition by the draft Shoreline Management Plan of the need to maintain Dunwich as a viable community, the Plan's appreciation that flood defences at Dunwich are both essential and sustainable, and its acknowledgement that there is scope for replacement of the experimental trial beach defence with similar but slightly more resilient low-lying groynes which could allow Dunwich to form as a slight headland. The Parish Meeting appreciates the positive and constructive approach taken by the Plan both towards the management of Dunwich's various sites of archaeological significance and towards the viability of the community as a whole.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Did not say

00058

PDZs

PDZ6

MA

PU

HOL 16

**General Comments:**

The SMP puts across the issues and objectives well but does not explain how MR will really result in securing the objectives if they were threatened. Would the Plan respond by stepping up to HTL?

**Your Comments:**

**Do you agree with what the SMP is trying to deliver? Yes**

The reference to damages is very concerning for those whose families would be affected. It is not clear what is, when it might be due and how it is calculated. The numbers themselves seem totally inadequate to support any affected family.

**Do you agree with the proposed policy?**

No. I agree with the policy objectives to protect and maintain Shingle Street through management of the complex natural system, however, I fundamentally disagree that the 2025 Policy for Shingle Street should be Managed Retreat. The policy here should continue to be "Hold the Line" as recommended for the 2055 and 2105 periods. The important distinction should be that the line to be held should be in front of the village. This should provide a last point of action to protect the village and the whole outlying area and yet enable adaptable management up to this point. This is vital for those families who live in Shingle Street, who have bought property on the back of the previous SMP policy and have invested all they have in building and maintaining their homes and families in this village. The uncertainty and worry that this proposed new SMP policy presents these families is significant and is highly distressing. The published material talking of the possible loss of the village within our lifetimes brings the full consequences of the need for a very strong SMP and subsequent maintenance action vividly to life. The protection of these homes and the community, the natural environment loved and used by so many, the highly valuable and important agricultural land and the important cultural monuments in the landscape is so important to the county and country that the SMP should fully reflect the clear commitment it makes in its text with a full HTL policy for Shingle Street, East lane and Hollesley Bay (should its failure threaten the wider area). As described in the SMP document, the natural processes continually change, the necessity maybe to Hold a Line for just a few years until the natural processes again protect the land, as such the SMP should make clear provision for such a possibility.

**Has the consultation been useful? Did not say**

It has enabled me to make comment but I do not know yet how this consultation will be used?

**Have you had the opportunity to discuss your issues? Did not say**

Appendix 8: Questionnaire Responses

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**Have the discussions been useful?** Did not say

00059

PDZs

PDZ6

MA

PU

HOL 16

**General Comments:**

: The SMP puts across the issues and objectives well but does not explain how MR will really result in securing the objectives if they were threatened. Would the Plan respond by stepping up to HTL?

**Your Comments:**

**Do you agree with what the SMP is trying to deliver? Yes**

The reference to damages is very concerning for those whose families would be affected. It is not clear what is, when it might be due and how it is calculated. The numbers themselves seem totally inadequate to support any affected family.

**Do you agree with the proposed policy?**

No. I agree with the policy objectives to protect and maintain Shingle Street through management of the complex natural system, however, I fundamentally disagree that the 2025 Policy for Shingle Street should be Managed Retreat. The policy here should continue to be "Hold the Line" as recommended for the 2055 and 2105 periods. The important distinction should be that the line to be held should be in front of the village. This should provide a last point of action to protect the village and the whole outlying area and yet enable adaptable management up to this point. This is vital for those families who live in Shingle Street, who have bought property on the back of the previous SMP policy and have invested all they have in building and maintaining their homes and families in this village. The uncertainty and worry that this proposed new SMP policy presents these families is significant and is highly distressing. The published material talking of the possible loss of the village within our lifetimes brings the full consequences of the need for a very strong SMP and subsequent maintenance action vividly to life. The protection of these homes and the community, the natural environment loved and used by so many, the highly valuable and important agricultural land and the important cultural monuments in the landscape is so important to the county and country that the SMP should fully reflect the clear commitment it makes in its text with a full HTL policy for Shingle Street, East lane and Hollesley Bay (should its failure threaten the wider area). As described in the SMP document, the natural processes continually change, the necessity maybe to Hold a Line for just a few years until the natural processes again protect the land, as such the SMP should make clear provision for such a possibility.

**Has the consultation been useful? Did not say**

It has enabled me to make comment but I do not know yet how this consultation will be used

**Have you had the opportunity to discuss your issues? Did not say**

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**Have the discussions been useful?** Did not say

00060

PDZs

PDZ3

MA

Blythburgh

PU

**General Comments:**

At a meeting held on Monday 14 September 2009, Blythburgh Parish Council considered the First Review of Shoreline Management Plan Sub cell 3c Lowestoft Ness to Landguard Point. Section PDZ3 - Easton Broad to Dunwich Cliffs - is relevant to Blythburgh. The Parish Council approved the Key Principles listed under 1.1.3. The protection of people's homes from flooding and erosion, the avoidance of damage to and enhancement of the natural heritage, the support of the historic environment and cultural heritage, and the maintenance of landscape designation features are of particular importance to this community.

The Parish Council noted the conclusion that management upstream of the A12 had already been shown to have little overall influence of estuary behaviour and hence the Shoreline Strategy (Ref. PDZ3: 11 and 30). The document assumes that there will be an increased probability of flooding in the area of the estuary upstream of the A12. This is a most disappointing assumption. Given that the defence of the A12 has been identified as being essential (PDZ3: 30) the Parish Council believes that the impact on the upstream area of any work to defend the A12 must be considered. There are properties at risk in Blythburgh in Church Lane and on the seaward side of the A12. Key links in the Public Footpath network are already cut or are threatened.

The Parish Council notes that the Shoreline Strategy Document stresses the importance of the relationship between flows within the estuary and the defence of the shoreline. There is therefore conflict between the Environment Agency's policy to stop defending the estuary from flooding and the need to defend the shoreline (PDZ3:31). It is of paramount importance that an integrated approach to estuary and shoreline defence is taken. The Parish Council believes that the Environment Agency's economic criteria and assumptions about funding constraints must be further questioned in this wider context. The Parish Council is pleased to see that the work of the Blyth Estuary Group is recognised, and that the silt deposition study they commissioned has been taken into account. The recent approval of a planning application for an extended programme of work on the river banks must also now be recognised.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

**Do you agree with the proposed policy?**

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**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Did not say

**Have the discussions been useful?** Did not say

## 00061

PDZs

PDZ5 PDZ6

MA

PU

### General Comments:

The opening of the shingle bank near Aldeburgh Martello Tower will be a very silly thing to do!! (I was about for 1953 floods and so know how parts of the town were affected with water twice a day up and down their staircases for 6 weeks until the sandbag wall was built from commencement of riverwall round Slaughden Road, Park Road right round to near Saxmundham Road and the 9 breaches in wall were repaired & water on marshes pumped out & also we got back the sewage system\*. Aldeburgh people will not want that again I am sure - national servicemen; airmen from both twin bases and volunteers built this bag wall. In 2007 river wall nearly gave way due to surge (very lucky!).

\*Electric sub-station; gasometer; waterworks and sewage works were all flooded and took a long while to have services restored.

### Your Comments:

The sea would come in t here and I can see it rushing down towards the estuary cutting through marshlands; orford; Havergate and coming right through Shingle Street at the back to go past the Martello Tower at east Lane - be too much water to cope with especially at spring tides. The water going up the river to Snape will do the same and do as it did in the surge of 1953 - rivers merged together and East Anglian landscape looked like lakes with bits of islands sticking up. Look for report on BBC radio/TV made beginning of 1953 by the late Charles Gardiner. Do not let the sea in there for goodness sake. It would affect Shingle Street, & Bawdsey especially besides Aldeburgh.

**Do you agree with what the SMP is trying to deliver?** Yes

A lot needs ironing out.

**Do you agree with the proposed policy?** Yes

In some ways a long way to go

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

Found Bill Parker and Bob Chamberlain extremely helpful at Hollesley Village Hall.

**Have the discussions been useful?** Yes

It is a pity that many missed it due to late bookings of the event.



**00062**

**PDZs** PDZ2 PDZ3

**MA**

**PU**

**General Comments:**

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

When will Southwold harbour be repaired? The whole scheme depends on it. (Urgent)

**Do you agree with the proposed policy?** Yes

**Has the consultation been useful?** Yes

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

00063

PDZs

PDZ5

PDZ6

MA

PU

**General Comments:**

I think an HTL approach should be adopted both north and south of Aldeburgh. It is critical that there is no breach at Slaughden in the future. Once sea defences are breached habitat behind goes from fresh to salt so all biodiversity is lost.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

**Do you agree with the proposed policy?**

No. HTL should be adopted on all our coastline. This should only ever be changed if a proper compensation package as in Holland was to be adopted.

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** Yes

**Have the discussions been useful?** Yes

00064

PDZs PDZ1 PDZ2 PDZ3

MA

PU

**General Comments:**

I reject the proposal of No Active Intervention on the coastline from Benacre Broad to Easton Broad including the village of Covehithe, on the stated basis that there is need for erosion to feed the long shore drift South. Even if this need is accepted, about which we are not clear, there is no proposal for compensation for those who live in Covehithe village or for the historic ruin, church and properties in the village.

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?**

No.

**Do you agree with the proposed policy?**

No. I reject the proposal of No Active Intervention on the coastline from Benacre Broad to Easton Broad including the village of Covehithe, on the stated basis that there is need for erosion to feed the long shore drift South. Even if this need is accepted, about which we are not clear, there is no proposal for compensation for those who live in Covehithe village or for the historic ruin, church and properties in the village.

The Benacre Estate includes approximately 3 ½ miles of coastline, from the Kessingland Pumping station in the north to the Easton Broad in the south. The topography varies from low lying dunes in the north and around the broads, to high sand cliffs at Covehithe and Easton Wood. The coastline has been receding over many years; however this shoreline re-alignment has greatly accelerated over the last 5 to 7 years.

At the recent SMP3 meeting of landowners and affected parties at Southwold Pier details were given of the Environment Agency's proposal for the future Shoreline Management Plan for the area from Lowestoft Ness to Felixstowe Languard Point. It was stated by the main speaker that 'SMP3 was not written in stone' and that alterations could still be made before the document was formally published for Public Consultation. During the session it was confirmed that the 'Benacre shoreline' would not only be allowed to retreat inland, but that the compilers of SMP3 had concluded that there is no alternative to NAI, as the sediment from the Benacre stretch of coast is useful when allowed to wash south in order to 'protect' other more southerly areas, In other words a sacrifice, the future of the Benacre Shoreline had been decided, without any consultation with affected landowners and occupiers.

It is interesting that there is no proper or little mention in the SMP3 document of the effect of the surrounding community. The Evaluation document which forms part of the Full Draft SMP, refers to the issues at Covehithe, Easton and the Benacre area as 'Kessingland to Easton Barents' and has made little mention of some of the

Appendix 8: Questionnaire Responses

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fundamentally important issues and the effect on the surrounding community. These areas must come under their own headings and must include the following.

- 1) Farm land (commercial interests)
- 2) Agricultural Land Risk of loss / damage to land / livestock from flooding and erosion.
- 3) Water abstraction points
- 4) Mineral rights
- 5) Sand dunes
- 6) Sandy Grassland
- 7) Scrub woodland
- 8) Loss of habitat along the stretch
- 9) Loss of the internationally important Benacre Nature Reserve and surrounding bird breeding areas
- 10) Reed bed loss
- 11) River outfall
- 12) Heaths
- 13) Beach
- 14) Extensive high archaeological potential.
- 15) Human Rights to being forced to becoming a sacrifice.
- 16) Critical transport links
- 17) Benacre Pumping Station
- 18) Hundred River
- 19) Footpaths
- 20) Erosion of bunds
- 21) Cliffs at Covehithe
- 22) Covehithe Village
- 23) Residential property at Benacre, Covehithe and Easton
- 24) St Andrews Church, Covehithe Medieval (and possible early Anglo-Saxon) settlement evidence around Covehithe church. Crop marks and surface finds extend south to Broad. Finds prehistoric onwards from cliff erosion.
- 25) Important landscape features.
- 26) Timbers found in peat, possible site of Saxon boat find, and former harbour; medieval peat cutting; post medieval water meadow management system and duck decoy. High archaeological potential including waterlogged deposits.
- 27) High archaeological finds at Covehithe Cliffs
- 28) The Southwold to Wrentham highway at Potter's Bridge will be exposed to increasing levels of flood risk.
- 29) Tourism

If the Benacre pumping station should be moved inland little account has been made of the effect on the sewage pumping station, residential homes and the Kessingland levels. Similarly to the south if the coastline is allowed to erode the coastal defense of Southwold will be much more costly to maintain when the Easton Bavants shoreline has moved inland which will result in a greater possibility of Southwold becoming an island.

#### Proposal

It is the owner's and their adviser's view that "soft" engineering measures be implemented along the Benacre coast line. An inspection by Andrew Hawes from Stephen Hawes Associates in Aldeburgh, who specialize world-wide in the

Appendix 8: Questionnaire Responses

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management of coastal erosion, has been completed. It is expressly hoped that any suggested solutions will be given proper consideration.

Conclusion.

It is understood that detailed liaising with Natural England in regards to the 'impact of intervention' is of vital importance. The aspect of additional private and other funding has not been mentioned in the SMP 3 report and the Benacre Estate would expect to make a contribution if a suitable way forward can be agreed. At a recent Coastal Communities at Risk meeting in Westminster I was told by a representative from Royal Haskoning that even if we found the funding ourselves to slow down the erosion upon the Benacre Shoreline, we would not be allowed to proceed as it had already been decided that we are to be a sacrifice as 'the sediment from the Benacre stretch of coast was useful when allowed to wash south in order to 'protect' other more southerly areas'. This reflects the comments as reflected in the SMP3 meeting of landowners and affected parties at Southwold Pier and is a fundamental u-turn. When originally discussed the issues were all of a purely financial nature and we were told that the costs would be too great. Benacre has potentially and subject to consultation, overcome this issue and is therefore now being told that it is not a financial issue, more of the cliffs being allowed to erode to allow the shift of sediment to the south. It is fairly obvious that the 'financial' argument was purely used as an excuse to stop the landowner in finding other solutions. This now brings to light the human rights of the landowners affected. It is important the above issues are recognized and are included in the SMP3 document. We would also expect that the authors of future reports include the following paragraph:

'This policy does not preclude landowners in exercising an option to retain or slow coastal erosion by means of private or other funding means.'

Unless large sums of money are spent on 1950s style sea walls, coastal erosion will continue along the Suffolk Coast Line. The owner and the advisers of the Benacre Estate accept coastal erosion will not disappear; however, it does not understand why SMP3 calls for a total capitulation along the Benacre shoreline. The Estate feels that insufficient study has been made on the far cheaper option of 'soft' engineering measures along the coast and has been left with no option but to independently investigate this further.

The Estate intends to share the conclusions from its advisers and experts with the authors of the SMP3 report and looks forward to working in a partnership with all those involved to reduce the annual erosion rate along the Benacre coast line.

**Has the consultation been useful?** No

No body has actually listened at all, you have made up your mind long ago, and it is on a purely fraudulent basis that the document is called a 'draft'.

**Have you had the opportunity to discuss your issues?** Did not say

**Have the discussions been useful?** Did not say

00065

PDZs

PDZ3

MA

PU

**General Comments:**

The language of the document is difficult to decipher. In general the lack of a clear decision about the long-term maintenance of Southwold harbour (south side) creates uncertainty re the historic buildings located in Ferry Road (and their current market value which runs into millions of pounds).

**Your Comments:**

**Do you agree with what the SMP is trying to deliver?** Yes

Partially. Indecision about south side of Southwold harbour walk will endanger valuable amenity land and historic properties.

**Do you agree with the proposed policy?**

On balance, is an improvement apart from the above point

**Has the consultation been useful?** Did not say

**Have you had the opportunity to discuss your issues?** No

**Have the discussions been useful?** Did not say

N/a

## **SMP3C KEY STAKEHOLDER WORKSHOPS CONSULTATION REPORT**

### **Appendix 9: Other Correspondence**

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#### **Response 1**

(transcribed from handwritten letter)

Dear Terry Oakes

With regard to the Suffolk Shoreline Management Plan review Sub-cell 3c Lowestoft Ness to Landguard Point, I should like to make a few comments.

Firstly, only the first two lines of 'Land and Property' make a clear and unambiguous statement in the whole document.

Secondly, there is no explanation of the 'constraints' provide by the SMP for the Deben estuary. The estuary strategy is not explained either.

Thirdly, in 'Nature Conservation', how is it possible to allow cliff erosion while maintaining cliff-top habitats? What 'balance' does the plan try to address?

Fourthly, what is meant by 'basic' control of man-made and natural features? – and the 'potential of low-lying areas'? These phrases are vague.

Re 'Implications for Landscape' how can the landscape character of the area be maintained if the policy is managed retreat or surrender to the sea?

The phrase 'resisting further encroachment of defence' is particularly unfortunate. It's the encroachment of the sea which is at issue.

Re 'Holding the Line' it seems unlikely that piecemeal defence of selected areas is a policy that will succeed in view of the power of coastal waters attacking from two or more sides.

Re 'Implications of the Historic Environment', I claim that it is not possible to assess the plan as it is written and give a verdict/opinion until the Action Plan is published. There simply isn't enough hard evidence but a lot of 'ifs' and 'buts'. I am a retired male British White teacher who is disappointed at the lack of progress & clear direction re coastal protection.

## **SMP3C KEY STAKEHOLDER WORKSHOPS CONSULTATION REPORT**

### **Appendix 9: Other Correspondence**

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#### **Response 2**

**Sent:** 17 September 2009 09:42

**To:** Terry Oakes

**Subject:** Costal defences plan

Dear Mr Oakes,

I have been viewing the plan for defences on line. I live at 58 Pakefield Road opposite the car Park and overlooking the sea. I am heartened by the plans referral to the Pakefield road headland being seen as an important feature in defence plans and also that possible strengthening of this area is being considered. Would you be able to reassure me that I am in fact reading the data correctly for this piece of the plan and also advise what plans if any there might be for work on this area of defences? I have photographs from 1963 when I lived here with my parents and the difference in how things were kept and looked after aesthetically is huge. The area and the sea wall is quiet tired at present. As this is a major tourist area for Lowestoft it seems to me that not only would strengthening defences secure housing but also add value to the area in terms of it being a pleasant outlook. What is also noticeable about the photo from the 60's is that the sea was right up to the wall. Since then the beach has grown steadily and surely so that the addition even of Maram grass now shows a degree of semi permanence to the growth

Yours sincerely



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#### **From Shingle Street Settlement Company**

##### **FORMAL RESPONSE**

FROM Shingle Street Settlement Company  
TO THE SUFFOLK PROPOSALS  
Shoreline Management Plan 2 Sub-cell 3c

September 2009

##### **Introduction**

The following note represents the formal response from the SSSCo to the proposals for SMP2 Sub-cell 3c, currently at the public consultation stage.

SSSCo was formed in May 1997: its members are the freeholders of Shingle Street. The purpose of the company is to maintain the open land around Shingle Street, to ensure public access to it, and to acquire any further such land. The company owns two large parcels of open land and several parts of the verge alongside the road.

##### **General**

1 SSSCo considers that the guidance DEFRA insists should be followed when drawing up Shoreline Management Plans should, but does not, take sufficient account of the social and economic importance of Britain's coast line and the possibility that any breach of our sea defences is likely to be irreversible.

The Suffolk Coast has historically receded and expanded, which has resulted in human intervention to defend it at many points and over long years. While recognising that the impact of Climate Change may result in sea-level rise, we are wholly unconvinced that there is yet any reason to abandon the current "Hold the Line" policy for the Suffolk coastline.

2 Notwithstanding the successful raising of adequate private funds to undertake vital works at East Lane Point, we believe that in principle, national government funds should be deployed in sufficient quantity to protect the coastal lands and people of the United Kingdom. The coastline belongs to all citizens, can be and is visited by all citizens, and should not be abandoned for reasons of cost. While we note the Plan's emphasis on innovation in fund-raising, especially from private sources, we maintain our right to a fair share of taxation for Suffolk's coastal defence, and urge the Environment Agency to maintain its debate with government to this effect.

Furthermore, we believe that money spent on programmed repair to current defences, towards a medium term life, will assist in protecting the coastline over the longer term and minimise the need for massive expenditure at infrequent intervals — or worse, the need to abandon land to the sea.

3 Sizewell 3 should be treated as a major development affecting the entire Suffolk coast, and not only its neighbourhood. Its safety is paramount to the welfare of the county. The business plan for the future development of the site should include provision for present and forward funding of coastal defences for the immediate and extended county coastline for a period well in excess of 100 years.

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4 The importance of Felixstowe Docks to Europe, the UK and East Anglia is incontrovertible, and their protection from sea and river flooding is vital. In return, their owners should be required to contribute to the sea and river defences for Felixstowe and Harwich, and the adjoining Essex and Suffolk coastline areas.

5 We would like to see some discussion of compensation for those likely to suffer from unchecked immediate, medium term or long term coastal erosion.

#### Shingle Street

6 We welcome and agree with the general objective of maintaining "the semi-natural and unique quality and community of Shingle Street" and of the surrounding agricultural value of the area, in a sustainable manner. We are unclear what "adaptation" is envisaged and would welcome further discussion of this.

7 Before any conclusions are reached for any part of the Alde and Ore area, including Shingle Street, we recommend awaiting completion of the work on the Estuary: ie the current Alde and Ore Futures, or Integrated Coastal Zone, Project.

We believe, in general, that Shoreline Management planning should not be divorced from possibly inter-related estuarine strategies and management, and that this is especially appropriate in Suffolk.

In particular, lying at the mouth of the Alde and Ore Rivers as it does, the Shingle Street environment is affected by both the river(s) and the sea. The Shoreline Management Plan should offer the chance for both the Government and the Environment Agency wholeheartedly to commit themselves to ensuring the future of:

Shingle Street's properties (including traditional Coastguard houses; Victorian fishermen's cottages and seaside villas; a Martello Tower; post World War II replacement housing; and a modernist home by the renowned Suffolk architect, John Penn.)

its uniquely wild setting, where visiting walkers, bird watchers, anglers and many others enjoy one of Europe's few vegetated beaches, with RAMSAR, SSSI and AONB status, *inter alia*.

8 We note the intention to continue to ensure warnings for Shingle Street residents of likely flooding, but would observe that the current system of flood warning is patchy, inconsistent, and alarmist in tone and advice, creating worry and confusion rather than action.

9 We desire, support and recommend prompt and continuous attention to the maintenance and increase of defences to Shingle Street. We expect and wish to see a commitment in the Plan to positive action, should tidal flows into and out of the estuary be increased ("managed realignment"); or should the need arise to "manage periodic loss of width to the beach" ("Hold the Line".)

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10 We would be interested to join in any discussion of techniques for strengthening the shingle, especially in front of the houses, such as those which seem to have been used successfully in the Netherlands.

**September 2009**

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**From Graham Henderson, SCAR**

**September 1st 2009**

**To whom it may concern**

#### **FORMAL RESPONSE FROM SCAR TO THE SUFFOLK PROPOSALS SMP2 Sub-cell 3c**

Please find the following formal response from Suffolk Coast Against Retreat (SCAR) to the proposals for SMP2 Sub-cell 3c currently at the public consultation stage.

SCAR consider that the guidance Defra insists should be followed when drawing up these plans is flawed as it does not take into full account of the economic importance of Britain's coast line and the possibility that any breach of our sea defences is likely to be irreversible. We do not accept there is any reason to abandon the current "Hold the Line" policy for the Suffolk coastline and we do not concur with several principles and proposals of SMP2 Sub-cell 3.

1. There is a lack of sensible co-ordination between coastline and estuarine strategies. Suffolk's estuaries are so integrated into the coastline that a shoreline strategy should only be finalized in concurrence with strategies for all four estuaries - the Blyth, Alde/Ore, Deben and Orwell/Stour together with additional relevant locations, such as Minsmere sluice. We note that the Essex SMP2 realistically combines coastal and estuarine strategies. The justification for a combined strategy is fully explained within the document Defra Coastal Change Policy recommendations for SMPs under the sub section 'Integration of estuaries'.
2. SCAR rejects the proposal of No Active Intervention on the coastline from Benacre Broad to Easton Broad including the village of Covehithe, on the stated basis that there is need for erosion to feed the long shore drift South. Even if this need is accepted, about which we are not clear, there is no proposal for compensation for those who live in Covehithe village or for the historic ruin, church and properties in the village.
3. Sizewell B should be treated as a major development affecting the entire Suffolk coast as its safety is paramount to the welfare of the county. There should be no question of creating a nuclear island. The business plan for the future development of the site should include provision for present and forward funding of coastal defences for the immediate and extended county coastline for a period well in excess of 100 years.
4. We consider there are other unsatisfactory issues in the plan as follows:

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- The changing attitude at Easton Bavents as a result of current negotiations between Natural England, The Environment Agency, Waveney DC and Peter Boggis, alongside the human rights history as approved by the Secretary of State with regard to the Charles England appeal, requires more time before completion of the SMP2 decision for this part of the coast. Government policy must take into account the rights of the individual citizen.
- Blyth estuary funding and other outstanding matters of defence
- Slaughden -admitted in SMP2 draft as dependent on the estuarine policy
- Aide and Ore: Completion should be awaited of the current ICZM and ACES projects
- We consider that more time should be allowed for the generation of proposals for public/private funding
- The Government and Defra should clarify how 'food security' policies dovetail with the fact that 60 per cent of Grade 1 agricultural land lies below the five metre contour line.

For these reasons, we conclude that we cannot accept and therefore will not support the current SMP2 Sub-cell 3c in its present state and without the Government fulfilling its obligations under ED law on human rights. We recommend that both County and local District Councils should refuse to approve these proposals until further studies are completed. Where and when appropriate we shall make these facts known publically through meetings and the media.

Yours sincerely

Graham Henderson

Chairman

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#### **From Nick Collinson, Suffolk Coast and Heaths**

**From:** Nick Collinson

**Sent:** 26 August 2009 16:53

**Subject:** RE: SMP natural environment & access stakeholder meeting

Dear all

Notes from the meeting this morning. Up to you obviously, how or if you use them, but I hope you all found it useful to exchange ideas.

Thanks to John for taking us through the SMP so informatively.

Generic concerns/issues:

- There needs to be a proper evaluation of ALL assets (not just economic ones), which there currently doesn't appear to be, whether this is undesignated wildlife habitat (Kessingland Levels), landscape or public access. We made no suggestion of preserving things in aspic, but simply to ensure decisions about change are made with full information to hand
- The biodiversity value of the coast is more than the sum of its parts. Numerous examples of species & people (tourists) that use the landscape rather than simply individual protected sites. The assets need to be considered at a landscape scale
- It isn't clear how Coastal Access is factored into the SMP. This needs to be clearer and we felt that there is probably enough information within the draft NE Coastal Access strategy to inform the SMP at this strategic policy level
- NAI policies on the coast make little sense if private investment and landowner action is to be allowed/encouraged. NAI policies effectively tie everyone's hands and prevents any schemes coming forward. If NAI is a flexible policy and allowing of private investment/action then NAI as a policy is meaningless
- BLY 10.1 is NAI, yet the Blyth Users Group application is effectively a HTL scheme. What is the role of the SMP if local action can fly in the face of SMP policies
- HTL should be used as the default 20 year epoch policy, wherever a sustainable or feasible option, to allow time for social and environmental adaptation. E.g. compensatory wildlife habitats take several years to find, buy and create.
- If the technical advice is that a breach is required somewhere on the Alde/Ore, although it is likely NOT to be at Slaughden, then the SMP should be more transparent about this, rather than being silent and leaving ACES to go public with the issue.
- The link with the forthcoming Deben Estuary Strategy needs to be more closely thought through. Current HTL policies in the mouth of the estuary, DEB 17.3/17.4, and resultant loss of salt marsh through coastal squeeze, will put a lot of pressure on the forthcoming strategy for realignment higher up the estuary. This effectively pre-determines what the strategy will need to say,

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potentially pulling the rug from under the current land-owner based approach. Careful we don't have a Blyth Mk ii !!!

- 100 year epoch- so many things will change over this timescale- our coastal processes knowledge, our opinions, our politics. 100 years is a meaningless timescale over which to have SMP policies, particularly given the PDZs are new for SMP2, and it is therefore difficult to cross reference management units from SMP1 to SMP2
- There seems little review of SMP1, particularly which policies worked well, which didn't and which needed to be done differently.
- General concern that the Appropriate Assessment is not detailed enough
- Concern that SEA does not cover issues in enough depth, particularly landscape and access issues
- Part of the valuation of assets needs to be the value of the landscape to tourism. The total tourism value of the Suffolk Coast and Heaths AONB in 2006 was £166 million (East of England Tourism). The effect of some of the policies on this value of the landscape in economic terms is missing. i.e. Aldeburgh to Thorpeness Road and SMP NAI policy. Again not about preserving this popular tourist route in aspic, but being FULLY aware of the consequences of change, even if over longer term.
- Landscape is not just about natural habitats. Its is about the footprint of man over centuries and millennia and how that has shaped the habitats into what we see today. Its about the cultural aspects of the area and its sense of place. Landscape change is ongoing and again there is no aspiration to preserve it is aspic, it never has been thus. However just like with wildlife habitat change/loss, there is a need to fully understand the value and richness of what is being changed/lost.
- Simple reference to the Countryside Commission document on Suffolk Coast and Heaths Landscape Assessment, would have helped enormously to better understand the landscape assets and the cultural importance of the SMP sub-cell
- Consequential upstream effects are not fully thought-through. E.g. Deben estuary (above). Also the SMP area at Kessingland only covers a fraction of the Levels. What is the plan for the upper Levels and what are the implications on the upper levels of the SMP policies? Freshwater is currently pumped from the Levels, are the upper reaches potential compensatory freshwater habitat?
- Policies need to be consistent. NAI and HTL are both considered beneficial for landscape at Easton Bavents and East Lane (Bawdsey) respectively. SMP can't have it both ways. Certainly concern that rock armour at east lane is considered beneficial for the landscape, in an area designated for its soft and dynamic coast.

Good to see you all, best wishes

**Nick**

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#### **Response 3**

Sent: 24 August 2009 16:56

Subject: Pakefield coastal protection and transport links

Hello

I am a local resident and a few major issues have come up recently on which I would like to know what you and your colleagues on Suffolk and Norfolk County Councils are proposing to do.

The first is the coastal defences. You will be aware of the recent consultation on the technical report which is proposing amendments to the current plan that has been in place for 10 years. There was a local meeting in Kessingland, but there was no meeting in Pakefield. My concern is that the proposals appear to be reducing the protection planned for Pakefield. It is a complex and lengthy document. If it would help I would be happy to send you the relevant extracts.

In short however, they are proposing that we accept that in the longer term (not that long) the loss of the parish Church.

I can see they are looking for savings, but I cannot think this is really a best plan. If we act now, especially as the defense of Pakefield would be a relatively cheap measure. It will be 'a stitch in time'. If we leave it, Pakefield will drop down the list of priorities and when the coastal threat gets worse, it will be too late for us.

Please advise on next steps and on your position on this issue.

Second transport

We really need good connections and an active political representation to achieve this.

Currently the Department of Transport transport strategy (<http://www.dft.gov.uk/about/strategy/transportstrategy/>) shows the whole of E. Anglia as off the strategic network. This is therefore the time to make a case for balancing out the strategic network and supporting economic development in this region.

Are you pressing for this? There are many very low cost improvements to the transport network that could help this area, eg, a rail link to Stansted from the Colchester line, road improvements, dualling the railway line as necessary to Ipswich.

At a time of recession, especially as this area has already been identified as at risk of a very slow recovery, now is the time to ask for useful, small improvements that could really help us here.

The newspapers are also reporting a plan to take away the direct rail service to Lowestoft from London. Is it true that this has been proposed? National Express only recently improved the service but they did it in such an incompetent way it is



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hardly surprising they have not made a success of it. They are already under scrutiny for their failure with the East Coast line.

I would be grateful for your advice on what is happening and what the process for decision-making is going to be and also what role the County Council will take in discussions with the operator and the Department.

Best wishes

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#### **Response 4**

Dear Terry Oakes

Shoreline Management Plan Review (SMP2) : Draft Consultation  
Policy Development Zone 03 - Easton Broad to Dunwich Cliffs  
Management Areas 08, 09 and 10 - Southwold and Southwold North - The Denes to  
Walberswick including The Mouth of The Estuary - Blyth Inner Estuary

We attended the Shoreline Management Plan Review SMP2 exhibition on the 4 July in Southwold. In this submission we have considered document PDZ 03, as the main area of our interest.

In our submission to the Blyth Estuary Draft Strategy consultation we stated our view that the sea and river flood defences, The Denes, harbour structures, marsh drainage and sluices, are a comprehensive and interdependent flood defence infrastructure. These flood defences must be restored and maintained to original conditions and levels, as a complete flood defence system. This remains our view

1) Our primary concern is the SMP2 proposal to apply a 'managed realignment' of the shoreline along the line of the existing seawall frontage north of Southwold Pier. It is understood that the flood defence seawall concrete structure, apparently in a satisfactory condition, would be removed during the 'second epoch, 2025 to 2055', allowing the Easton Marsh area behind the sea wall to flood and become 'salt marsh'. This proposal would necessitate extensive flood defence works and maintenance control around the whole of the perimeter of the new salt marsh. Construction and maintenance of a 'significant structure' to 'heavily defend' the Southwold Town frontage just north of the Pier and the new 'shoreline frontage' will be necessary, together with 'some form of control over the northern section of the frontage' to stop outflanking.

The removal of the sea wall structure and provision and maintenance of the extensive new flood defences to property and roads would represent a considerable cost, far in excess of the retention, maintenance and extension of the existing seawall frontage. To maintain and extend the seawall, as a first line of flood defence, is in our view a preferred way to safeguard Southwold and Reydon. FRG oppose the SMP Review proposal.

2) The Denes sand dune flood defence system has clearly been a success. It should therefore be looked after. The following repair, maintenance and monitoring should be considered ;-

- (i) Repair the seaward face of the sand dunes.
- (ii) Plant Marram grass where necessary, fence off to exclude the public, to aid recovery and sand catching.
- (iii) Provide signs to inform walkers about the importance of the sand dune flood defences and to encourage the use of established paths and steps.
- (iv) Find a method for reducing the damage done by rabbits to the sand dune bank along Ferry Road.

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(v) Monitor the sand dune system annually and ensure that there is an ongoing maintenance programme.

I would be grateful for an acknowledgement of our submission and to know when the results of the consultation are to be published.

Yours sincerely

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**From David Andren, Alde and Ore Association**

#### **ALDE AND ORE ASSOCIATION RESPONSE TO DRAFT PROPOSALS IN SHORLINE MANAGEMENT PLAN (SMP2) SUB-CELL 3c: Thorpeness to Shingle Street**

This note responds to the request for comments on the draft shoreline plan SMP2 (Sub-cell 3c – Policy Units 5 and 6)).

The Alde and Ore Association seeks to preserve for the public benefit the Alde and Ore Estuary, the coast from Thorpeness to Shingle Street and the surrounding land area. The Association is a founder member and active supporter of SCAR (Suffolk Coast Against Retreat) and has already contributed to the response prepared by SCAR dated 1 September 2009. We also support the views expressed by Shingle Street Company in their separate response.

The Association has about 1,800 corporate and individual members equivalent to nearly 20 per cent of the permanent population of this part of the coast and the surrounding 17 parishes. Details of the Association's activities, including copies of our recent newsletters, can be found on the Association's web site at [www.aldeandore.net](http://www.aldeandore.net).

#### **1. Basis on which draft SMP2 proposals have been prepared**

1.1 While welcoming the Department of the Environment, Food and Rural Affairs' (DEFRA's) agreement to look at policy options for periods shorter than 100 years, the Association considers DEFRA guidance on SMPs to be fatally flawed. This guidance assumes that only some £50 million a year will be available to fund coastal and tidal river defences for the whole of England, fails to recognise that failure of the coastal defences can frequently prove irreversible and does not consider the wider economic consequences of abandoning defences for our coastal community.

1.2 The Association does not accept that it is yet necessary to abandon the Hold the Line Policy for the Suffolk Coast and believes that Government funding of coastal and tidal river defences is totally inadequate. We also strongly support the views expressed by Councillor Andy Smith (SCDC) in evidence to the Parliamentary Select Committee (EFRASC) considering the present Government's proposed Flood and Water Management Bill. Like the Local Government Flood Forum we believe local councils and flood defences committees or boards should be given much greater discretion to formulate local flood defence policies and freedom to raise funds through local taxes and contributions such as the regional flood defence levy.

#### **2. ACES and the integration of coastal and estuary management plans**

2.1 When the Environment Agency first proposed the development of an Estuary Development Plan for the Alde and Ore in 1993 our Association argued that, because of the particular configuration of our coast, it was important to look at the management strategy for the coast as well as the estuary itself. This led to agreement that consultants (Halcrow) should prepare a separate study known as the

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Thorpeness to Hollesley Strategy described to us as “a mini-SMP” which would be more detailed than was normally the case with SMPs. With the support of the Alde and Ore Association the Environment Agency re-launched the Estuary Management Strategy earlier this year name under the new title “Aldeburgh and Coast Estuary Strategy” (ACES) and decided that Halcrow, rather than Black & Veatch, should be the lead consultants for this study.

2.2 At no point in the draft SMP dealing with our part of the coast and the Alde and Ore Estuary do Royal Haskoning specifically refer to ACES or the very detailed specification for this study prepared by the Environment Agency. Given that the specification prepared by Royal Haskoning for the Essex Coast, published in August 2009, covers both the Essex coast and estuaries we find this astonishing. We think it is nonsensical to try to prejudge decisions on the coast until the more detailed studies which Halcrow are now preparing are available. We have noted that other estuary groups and SCAR hold the same view.

### **3. Consultation**

Royal Haskoning claim that there has been detailed consultation with the Community. Our Association participated in two discussions before the proposals were put into the public domain. We detect very little change to those proposals in the document now published despite our representations eg in relation to the ACES study. We think it important to note that at these meetings representatives of the local community made it clear that they could not support the draft proposals.

### **4. Alde and Ore Futures**

Since the launch of SMP2 Suffolk Coastal District Council have launched a new initiative known as ‘Alde and Ore Futures’. Representatives of the Association attended the launch meeting on 4 September 2009. The objective is to draw up a preliminary mini-ICZM (Integrated Coastal Zone Management) Plan for the Alde and Ore Estuary, including the coast from Thorpeness and 17 parishes surrounding the Alde and Ore Estuary, by June 2010. Although we have some reservations we welcome this new initiative for the following reasons:

- it concentrates on a time period up to 2030 rather than 100 years while recognising that the risk of sea level rise in the longer term must be taken into account as we develop adaptation plans;
- it recognises the importance of defending the coast and the Alde and Ore estuary to the long term economic viability of the area and adopts a more holistic approach than is possible under current DEFRA guidance;
- it seeks to develop plans in close and genuine consultation with the local community.

### **5. Approval of the Shoreline Management Plan**

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We are advised by the consultants that they hope Suffolk and Waveney Coastal District Councils will be able to approve the proposals in the current SMP by December 2009. We and our members consider it would be totally inappropriate for the two Councils to be asked to approve the SMP until the results of the ACES and Alde and Ore Futures studies are available. Given the agreed need to look at management of the coast and the estuary together we believe it is unreasonable to take decisions relating to the coast in isolation from decisions affecting the estuary.

#### **6. Issues**

6.1 The SMP frequently refers to the “estuary strategy” for the Alde and Ore rivers. While the SMP recognises that nothing can be agreed until the “estuary strategy” is available, it never the less proposes a preferred option of doing nothing south of Slaughden Martello Tower. We consider such a conclusion, however provisional, cannot be sustained or justified until the ACES and Alde and Ore Futures studies have been completed. We also believe the assumptions made about the likely impact of the breach need to be informed by knowledge of the strength of water flows within the estuary as well as along the coast. The SMP should not therefore make any recommendations for change however provisional.

6.2 The SMP focuses on the shore and ignores the fact that the major threat to the town of Aldeburgh is not just the incursion from the sea: it is also the incursion of the sea via the river over the river wall which runs due west from Slaughden, as happened in 1953. The calculations on costs also appear to have overlooked the need to maintain or strengthen this river wall if there is a breach in the coastal defences at or near Slaughden.

6.3 The Alde and Ore Association and the Environment Agency have agreed the basis on which over 1,750 properties at risk of flooding should be valued and we now have estimated values for 90 per cent of those properties. These values, excluding major hotels, publicly owned community assets, farms and agricultural land amount to some £500 million. The number of properties in the SMP said to be at risk of flooding and their value are grossly understated in the Report. We therefore consider it is unacceptable to endorse any of the conclusions in the SMP based on this earlier data.

6.4 As we have stated in previous submissions to the Environment Agency we believe that there is a case for improving sea defences south of Aldeburgh. In particular we think it is necessary to look at the case for increasing the height and looking at possibilities other than shingle recharge for protecting the relatively short section of the coast running from south of the Martello Tower up to the point at which the height of the shingle ridge begins to rise further south.

6.5 The Environment Agency has very recently undertaken a detailed crest level survey of the heights of our sea and river defences. We understand this will shortly be available to the Association and others. Since we have not yet seen this survey we assume that it cannot have been taken into account by the consultants when

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drafting SMP2. We consider this indefensible and that engineering consultants need to be employed to assess its implications.

6.6 The authors of the Report appear to be unaware that the estuary area includes not just agricultural land but that that land is now a major vegetable producing area of the UK. It relies on the clean aquifers for irrigation. Breaching these river defences would allow these water sources to become brackish and subject to saline intrusion. As a result the UK would lose a significant resource to the detriment of its food supplies and work to reduce food transport to assist reducing the trend towards global warming.

6.7. It is not clear from the draft Report that the authors appreciate the fact that there are many miles of river which can be used safely by small sailing and other boats which make a major contribution to the area's economy. Without that safe sailing, which would largely go if a breach occurred, the economic loss would be high as most of the sailing would cease. This points again to the need for a full evaluation of the coast, the estuary and the area as it is a major contributor to the area's economic well being. This could usefully take as its starting point the 2003 economic survey of the Alde and Ore Estuary and the surrounding land area sponsored by the Alde and Ore Association, the East of England Development Agency, Suffolk Coastal District Council, the Suffolk Coast and Heaths Unit and others.

6.8 Further work is also needed to quantify the population numbers at risk of flooding. The Association considers that trying to base figures on just permanent residents is unacceptable and that the estimates which are being used for the SMP, ACES and Alde and Ore futures are too low. Over the last 30 years the towns (including Thorpeness) and countryside surrounding the Alde and Ore Estuary have attracted huge numbers of people with second homes and led to a large increase in the number of rental properties. In Aldeburgh, for example, the permanent population is thought to be about 2,000 but in summer months this can be as high as 7,000. In the case of second home owners there are people who may live most of the week in Suffolk but who have other homes, eg in London, which are formally declared for various reasons as their "main residence".

6.11 The plan makes no reference to innovative developments in coastal management which could affect their efficacy and cost. For example, the National Trust are trialling resin based injections into the shingle along the spit near Lantern Marsh, new artificial shingle banks or mounds are being tested at Dunwich so far with positive results, and there are new approaches and old forgotten, but effective, ideas being resurrected on different heights and angles of groynes. All these could be highly relevant to the estuary. When compared with the cost of losing the economic value of the river they are likely to prove well worth considering and feasible within the first 25 year period.

6.12 We believe that along certain sections of the coast there is a case for examining the benefits of beach and shoreline stabilization plans. Along the coast we think this should be looked at in relation to measures which could help prevent erosion of the cliffs at Thorpeness and the area south of the Slaughden Martello Tower up to and including the Orford Ness lighthouse.

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6.13 In our 2008 position statement entitled “Framework for the Future”, which was welcomed by Lord Chris Smith (chairman of the Environment Agency), we argued for public/private ventures to protect our coast and river defences. The SCAR response to the SMP also stresses the need, particularly in the light of initiative undertaken at East Lane (described in an article in our February 2009 newsletter available on our web site). During a wide ranging discussion with the Environment Agency in December 2008 we were promised a definitive statement on the scope for taking account of the availability of public and private finance from sources other than national Government. We received definitive DEFRA guidance on this subject on 11 September 2009. We will need to seek further clarification of the interpretation of this guidance as proposals develop during the course of the ACES and Alde and Ore Futures studies. Nevertheless, our preliminary assessment is that in the case of an economically prosperous area such as ours this new approach based on joint public/private finance offers considerable scope for imaginative adaptation plans. We consider these need to be fully examined by all key stakeholders before any irrevocable decisions are taken to abandon any of our coast and tidal river defences.

6.14 Although the SMP does recognise the existence of many historic artefacts in the area, including the Orford Ness Lighthouse, we consider a much more detailed study of their importance, eg those constructed on Orford Ness during the Second World War, is needed. Another area at risk of flooding is Snape Maltings – an asset of enormous cultural, educational and historical significance which is of great importance nationally and to the local economy. Large amounts of public, eg from the Arts Council, and private finance have been contributed towards its development. This can now only be carried out as part of the ACES and Alde and Ore Futures studies.

6.15 Finally, there are a number of points in the Report where points are asserted and not backed up either by facts or explanations. These include, in the Summary of Preferred Plan and Implications, paragraph 5.1 asserting that almost 100% of objectives are met in the first period but does not acknowledge the need for regular sound maintenance to avoid involuntary breaches. The same section then states that objectives are met assuming that these objectives are accepted. For example, the objective of supporting agriculture to adapt to changes is highly questionable as there may well be a case for ensuring as far as possible that aquifers are not allowed to become salinated.

## **7. Conclusion and summary**

7.1 The Alde and Ore Association takes the view that until a complete Report involving the whole of the Alde and Ore Estuary and the surrounding land area has been completed as part of the ACES and Alde and Ore Futures studies, it is not acceptable to decide whether or not to hold the line south of Slaughden. We believe that for the next 25 years, where the main risk is not from rising sea levels but a tidal surge, the policy should be to ‘hold the line’.

7.2 We also consider the Report:



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- fails to recognise the environmental importance of protecting and sites designated under the EU habitats directives which attract large numbers of visitors with a diverse range of interests to the area who often then become permanent or semi-permanent residents;
- the value of the estuary to businesses in the area;
- the importance of our rivers to the boating fraternity which brings many visitors from the UK and other countries to an area which has been described as 'A North Sea Gem' unique to the East coast of England;
- the potential loss of nationally important historic and cultural sites such as Snape Maltings;
- new and potential developments in coastal management techniques which are likely to become much more cost effective than the construction of traditional 'hard' (concrete) defences;
- the need to maintain the river walls protecting the Aldeburgh marshes without which huge sums will need to be spent if there is an irreversible breach in the sea wall south of Slaughden in order to save Aldeburgh town from flooding.

7.3 The Association cannot therefore support the Report's draft conclusions and will be recommending our members write to their local councillors urging the Council not to approve this plan until the ACES and Alde and Ore Futures studies have been completed.

September, 2009

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#### **Response 5**

**Sent:** 29 September 2009 22:09:17

**To:** Terry Oakes Associates Ltd

**Subject:** A Ferry Road Submission

Dear Terry Oakes

Shoreline Management Plan Review (SMP2) : Draft Consultation  
Policy Development Zone 03 - Easton Broad to Dunwich Cliffs  
Management Areas 08, 09 and 10 - Southwold and Southwold North - The Denes to  
Walberswick including The Mouth of The Estuary - Blyth Inner Estuary

We have lived on Ferry Road, Southwold for many years and before that my uncle lived there so our connection is very strong. It is a very distinct place, as is the surrounding Southwold, Covehithe, Walberswick and Dunwich area which needs to be maintained as a whole and protected from the sea, which has been done for 400 years. The policy of managed retreat proposed by the EA in 2007 would have had far-reaching consequences and was an unnecessary abandonment policy of this unique area. I consider the recent proposition to not maintain the existing concrete sea defence north of Southwold would make Southwold more vulnerable to the sea and it would be create a weakness to the whole area's sea defenses. It would not be economic either, to allow the sea to come in sooner, north of Southwold, as it would be more costly to remove the sea defence, once it had deteriorated, and then to build a new wall further back. It would be more sensible and cost effective to maintain it and to hold the line as is being done with the majority of the area.

The Denes in front of Ferry Road remains one of the main sea defenses for Ferry Road and although it has benefited from a build up of sand recently, the Denes itself could do with some maintenance to counter damage done by people walking on the very top of the precious bank that is the main defense on the seaward side of Ferry Road. We would like cost effective maintenance: planting and fencing to protect it while it establishes. Also paths established or directed away from the top of the bank to maintain its strength and height.

We are fully in agreement with and support the Ferry Road Group submission and hope you will take these points into consideration.

We look forward to a response.

Yours sincerely

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**From Sue Brown, Environment Agency**

#### **Draft Suffolk SMP Consultation comments**

##### Presentation

We are slightly unhappy about the way in which the draft SMP has been presented to the public. The Royal Haskoning logo appears on every page of the document and appendices and there seem to be many pages in the document that are internal to RH and shouldn't have been included in the consultation documents. We feel this should have been sorted out before publishing the documents.

There was no section at the front of the draft SMP giving people information about the public consultation period, where the documents are available, where to return comments to etc. We shouldn't assume that everyone has access to the internet to be able to look at these documents on-line and obtain this information.

Following on from this, it would have been helpful to people who wished to comment on the draft policies to have produced a summary document that they could use instead of having to read through the main document.

It would also have been good to include a few more photos in the draft SMP to break up the very long pages of text. There are many cases of wrong spellings, incorrect words used, abbreviations etc throughout the documents that we're surprised the plain English editor didn't pick up.

Not sure what SCDC's policy is about size of font for public documents. Ours is that they should be in at least 12 point throughout the document. Section 4 seems to contain a lot of information in a smaller font than this.

Table 3.1 runs over two pages with the footnotes in between. The whole table and footnotes should appear on the same page.

Some of the tables seem inconsistent. For example, the table on page PDZ1.10 shows units in each row of col 2 when these could be shown in the column heading. This table also shows the units in the heading to col 4 and these also appear in the rows. This applies to the same table in each PDZ.

##### Content

There is no list of contents at the front of the printed document. The reader is therefore faced with a lot of numbered sections with no clue as to what they are until they look at each. It would also have been useful to include a list of figures and tables at the start of the draft SMP.

A list of abbreviations would have been useful.

Section 1.1.4 contains detailed explanations of three of the generic SMP policies, but not of advance the line.

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Section 1.2.2 lists the appendices and what they contain. There should be an appendix showing the full policy appraisal, including why we didn't think it necessary to appraise every possible policy for each frontage (playing field).

Section 1.3.2, line 1 gives the wrong title for the East Anglian Coastal Group (EACG). Same section, para 2 on page 1.10 doesn't list Suffolk County Council as a member of the CSG.

On figure 1.1, the SMP for sub-cell 3b is called Kelling to Lowestoft Ness, not Norfolk.

Figure 3.1 says that it's not to scale. Not sure how a map isn't to scale?

Page 3.7, first para below the bullet points – there are a lot of abbreviations here that haven't been written out in full before this. Again, your plain English editor should have picked this up.

Section 3.1.3 – the second sub-head should read “Historic environment”, not “Heritage”. There are several instances throughout the documents where “heritage” has been used instead of “historic” [EH comment several months ago].  
Section 3.2.2 – there are a couple of places in para 1 of this section, and others throughout the documents, where “defence” has been used instead of “risk management” or “management”. We've commented about this before.

Section 3.2.4, penultimate para – might have been useful to mention the current consultation about this subject.

Section 3.4 – it would have been helpful to have listed all the PDZs here indicating where they start and finish along the coast.

Tide and water levels tables in section 4 – can't see where the column headings have been explained. There is no list of abbreviations, so many people won't understand what these tables refer to.

PDZ1, section 4.1.2 refers to a CFMP P5 policy. It would be helpful to explain what this means.

PDZ1, WPM scenario box, para 2, line 8 – a sentence has been repeated here. It would also be useful to know what the CFMP says about flood risk management policies for the areas planned for regeneration. This also applies to some of the other PUs.

Economic assessment tables in all PDZs – the MDSF assessment part of these tables doesn't contain any numbers of properties or area of agricultural land potentially at risk of flooding in the future. We feel that these figures should appear in these tables so it's clear what's at risk over the SMP timescale.

KES05, page 1.53 seems to be a bit inconsistent. The first table says we plan to maintain defences, but the second table says that two of the four policy units are NAI.

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The first table would be better with more explanation about the intent of management for the whole PU.

COV07 – the changes from present management section says “No substantial change...” What does this mean? If there are changes, we should say what they are.

PDZ3, NAI box on page 15 – it’s not necessary to say what the WPM approach would do. This should be obvious in the WPM box.

PDZ06, overview box on page 3, last line – it would be useful to know how many SSSIs there are and what they are designated for.

PDZ07, overview box, heritage and amenity section, line 4 – “leisure” has been omitted from “Felixstowe leisure centre”.

Section 7 doesn’t contain much information about the action plan and how the partners will use it. Also, it would have been helpful to have another section letting people know what will happen next and how the partners will complete the SMP process.

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**From John Jackson, Natural England**

Dear Terry,

#### **Lowestoft Ness to Landguard Point Shoreline Management Plan Review**

As discussed, please see our following comments at the public consultation stage. We look forward to further discussion at the next Client steering group in October.

#### **Appropriate Assessment**

Natural England agrees with the conclusion of the appropriate assessment that there will be an adverse effect on the integrity of a number of Natura 2000 sites.

This is because some areas\* of freshwater habitat are not sustainable *in situ*, and therefore it is necessary to provide compensatory habitat or replacement habitat at sustainable locations inland. We understand, as described in the appropriate assessment, that suitable compensatory or replacement habitat will be provided through the Environment Agency's Regional Habitat Replacement Programme (RHCP), and that where areas of freshwater habitat remain vulnerable to flooding by the sea in the interim, then adaptive measures will be put in place to avoid deterioration of sites. We expect the detail of timings, extent, and location for habitat compensation/replacement to be explored in detail through the RHCP.

( \*In the Blyth and Easton Valleys, at Walberswick, and in the Minsmere Valley.)

#### **Monitoring requirements in the Action Plan**

We support the approach of monitoring the coast to establish how the features are affected in response to SMP policy, for the Hollesley to East Lane management units, and we agree that a detailed study is needed here, to monitor the key elements of the wider area and to feed the results of this into the SMP3 process.

Furthermore, it is our view that a similar monitoring requirement exists for the Blyth Estuary, given the uncertainty about future estuary processes highlighted following the recent Blyth Sediment Study report, and that a further action is required to monitor the key elements of the Blyth Estuary and feed this into SMP 3.

#### **Landscape**

It is our view that the assessment of landscape character and landscape impacts given in the Strategic Environmental Assessment is currently weak. It does not offer a robust baseline of landscape character, with the consequence that any landscape impacts of policies cannot be explored.

A more detailed assessment is needed, which should be based on landscape evaluation criteria developed for the area, i.e.: The Landscape Character Study (Countryside Commission 1993), the Suffolk Coast and Heaths Landscape Character Guidelines (2003), and the Suffolk Landscape Characterisation (Suffolk County Council 2008). Once such an assessment is made, this could be used to identify and inform more detailed work, which might identified as part of the Action Plan.

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#### **Legal Challenge**

Thank you for forwarding the letter concerning a legal challenge to the SMP based on Habitats Regulations considerations. We are currently examining this letter, and will be in a position to report back to the steering group on 19 October.

Please do not hesitate to contact me if you would like to discuss any of these point further.

Yours Sincerely,

John Jackson  
Conservation Adviser

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**From Michael Hayes, Commodore, Aldeburgh Yacht Club**

Dear Sirs,

#### **Suffolk Shoreline Management Plan Review**

We only propose to comment on the Policy Zone 5 of the Review.

We note that for ALB 14 Thorpeness Haven to Aldeburgh the plan is to “hold the line” for policy units 14.3 and 14.4 Aldeburgh and Slaughden respectively and we are encouraged that that this objective is being recommended.

However, we are deeply concerned that the report’s preferred approach for ORF-15.1 Sudbourne Beach is to allow a breach at or just south of Martello Tower. We have noted that the Report recognises the concerns that this policy would have on the estuary itself and therefore is prepared to recommend that the “line is held” only as an interim policy until 2025 but does not address how this done except through recharging. We note also that Natural England’s advice is that this practice is not sustainable. In our view this emphasizes the need to complete the study on the estuary before any irreversible commitment is made concerning the coast.

We do find it interesting that the possible effect of protecting the beach at Aldeburgh using manmade structures has some effect on Sudbourne Bay where the basic principle of minimising reliance on manmade structures is being proposed. If one is going to adopt this principle in one area and not in other adjacent areas, it is important that a suitable transition is developed to minimise the effect of one on the other. This has not been addressed in the report and adopting this approach may delay the occurrence of a natural breach or the need for a managed breach.

While the report discusses a breach in the shoreline, it is not apparent that the authors realise that any breach would result in the loss of some several miles of “safe sailing” which would impact not just on the leisure activities which would largely disappear but also significantly on the economy of the area..To see the practical effect of their preferred option, one only has to look at the Ore south of Dove Point or the mouth of the Blyth to see that neither of these two stretches of water can be classified as providing “safe sailing”, in particular for juniors.

Finally we would obviously prefer the policy to have the objective of defending the coast south of the Martello Tower in order to reduce the likelihood of a breach, which would affect the character of the estuary and would create a new island in place of the Orfordness spit as well as a complete change in the direction of tide flows in the estuary itself south of any breach.

We therefore oppose the preferred option. Changing policy from that of holding the line without taking account of the estuary is not justifiable. It could only be done if a full evaluation of the estuary, the shoreline and its neighbouring sections were



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undertaken and that full evaluation found it to be the only option, because of the river side and sea side of the shoreline are inextricably linked.

Yours faithfully,  
For and on behalf of Aldeburgh Yacht Club,  
Michael Hayles  
Commodore

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#### **Response 6**

##### **Response to New Shoreline Management Plan for Lowestoft-Kessingland sub cells**

##### **Basis for comment:**

1. Currently Head of Geography at 13-18 Suffolk Comprehensive school teaching sea defence as part of A-level Geography.
2. B.Sc. Geography (Hull University) including final year specialism in coastal geomorphology.
3. Worked for the Marine Geology Unit of British Geological Survey (1986)..
4. Local resident of Kessingland, living close to the beach.

##### **Summary of response**

1. There is no justification for any assumption that some areas of the coast need to be allowed to erode in order to provide sediment for other areas. The scientific evidence is clear that most beach sediment does NOT derive from coastal erosion.
2. There is evidence in terms of the geological origin of beach pebbles found at Kessingland of offshore movement of pebbles sized material that is both well beyond the breaker zone and from areas outside of the sediment cell. As such serious consideration should be given as to whether the dredging of aggregates offshore of Pakefield may be adversely affecting rates of coastal erosion.
3. There appears to be an assumption in the shoreline management plan that the retreat of the cliffs to the South of Pakefield is primarily due to coastal erosion, whereas the cliff profiles there suggest that sub aerial (weathering and mass movement processes) are more likely to be dominant with the sea removing collapsed material. As such a range of low cost slope stabilisation strategies may be possible, such as the lowering the slope angle and vegetating the slopes. These adjacent cliffs at Kessingland where similar actions were taken many years ago contrast markedly with those at Pakefield.
4. The position of the proposed new clay bank in South Kessingland will effectively abandon both the village sewage works and 2 streets of permanent residential housing to the sea. At the consultation in Kessingland, the environment agency manager assured me that this clay bank had been drawn on the map 'in the wrong place'. However, it would be appreciated if this could be confirmed in writing and a revised plan put in the final version of the new shoreline management plan.

#### **Response to New Shoreline Management Plan**

##### **1. General comment:**

There appears to be an assumption in some of the thinking behind the new shore line management plan that it is necessary for certain parts of the coast to be allowed to

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erode in order to provide sediment that will form beaches in other areas. In response to this I would make the following comments:

1a) The scientific evidence is indisputable that a wide beach that absorbs wave energy is one the most effective forms of defence against coastal erosion.

b) However, this does NOT mean that in order for beaches to develop other areas of the coastline must be allowed to erode.

c) The scientific evidence in fact indicates very clearly that the overwhelming majority of beach material is NOT derived from erosion of the coast. Rather, it is the result of inland river erosion and sediment transport which is then carried out to sea via estuaries. I would draw your attention in particular to the work of H. Valentin (1954) who despite studying an area of the North Sea that had an erosion rate of 1.5m per year - one of the fastest erosion rates in the world - found that less than 3% of all the eroded material was contributed to adjacent beaches. The overwhelming majority of beach sediment was derived from river transport and erosion. Similarly, D.L Inman calculated that even where wave energy is highest in the world, less than 5% beach sediments result directly from cliff erosion. A similar conclusion is drawn by J. Pethick *An Introduction to Coastal Geomorphology* (London:Edward Arnold,1984):68 As such the assumption that there is value in leaving some areas with low economic importance to erode needs to be challenged.



d) There is also a significant drift along the coast of larger particles that originate at significant distances from the Suffolk Sediment sub cell. At Kessingland Ness (also commonly referred to as Benacre Ness, although it has now moved northwards entirely away from Benacre), the majority of the sediments above sand size are flint and chert, which are found in large quantities both in the nearby cliffs and inland

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across East Anglia. However, there are also small quantities of other rocks that originate from much further afield. These include greensand up to 8cm across (photo 1) whose nearest source is Hunstanton in North West Norfolk; a highly fossiliferous limestone (photo 2), which could have come from a number of locations ranging from Peak District rivers draining into the Trent, to the North Yorkshire coast. There are also large pieces of a ferrous sandstone similar in appearance to the rock known in Norfolk as 'carrstone', which occurs inland in the locality around Downham Market in South West Norfolk, or which alternatively may have come from rivers draining the ferrous sandstone area of Northamptonshire (photo 3). Neither the greensand nor the ferrous sandstone could conceivably be glacial erratics as the location of these geological deposits in the UK is inconsistent with the known direction of travel of ice reaching East Anglia. As such serious consideration should be given as to whether the dredging of aggregates offshore may be adversely affecting rates of coastal erosion.

The presence of the ferrous sandstone (photo 3) also clearly supports the existing published scientific research that the overwhelming majority of beach sediment is derived from river erosion and transport and NOT from coastal erosion.

Photo 1 (above) Greensand pebbles from Kessingland beach (nearest outcrop is Hunstanton in North West Norfolk).



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Photo 2 (above) fossiliferous limestone – most likely sources Peak district or North Yorkshire



Photo 3 ferrous sandstone - most likely source rivers draining into wash – either Downham Market area of NW Norfolk or ferrous sandstones in Northamptonshire) area.

#### **2. Pakefield**

I will make three points in respect of the recommendations made for Pakefield. Whilst it is accepted that some erosion of this stretch of shoreline has happened for many centuries and will continue to happen:

1. The stretch of coastline south of Pakefield church should not be allowed to erode simply on the pretext that it has a low economic value and there is a need to provide sediment for beaches further down the coast. The idea that some areas need to be left to erode to provide sediment for other areas further down the coast has little if any scientific support (see general comments above). Moreover, significant retreat of the cliff line around this part of Pakefield will ultimately threaten the residential area around Pakefield Street and surrounding roads.
2. Commercial dredging to extract aggregates currently operates off the coast of Pakefield. Further investigation of the impact of this on coastal erosion on the wider Suffolk coast is clearly needed. Here I will simply make two brief comments. a) There does appear to be an offshore movement of pebbles (as distinct from longshore drift which happens within the breaker zone). Beach

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material originating well to the North West of the Suffolk sediment sub cell (Greensand and Ferrous Sandstone – both of which originate in the area of the Wash) is found on Kessingland Ness, a mass of shingle which, as the report observes, is moving within the breaker zone from the south to north at the rate of 30m per year. This clearly indicates that there must *also* be an offshore movement of shingle from North to South i.e. from North West Norfolk travelling around to Suffolk. Any offshore dredging to extract aggregate is therefore likely to remove sediment that would otherwise contribute to the formation of beaches on the Suffolk coast. b) There is ample evidence from other locations that offshore dredging can in some circumstances significantly increase the rate of coastal erosion. The classic example of this was the village of Hallsands in South Devon. Offshore dredging nearby began in the late nineteenth century in order to provide aggregates for an extension to Plymouth docks. Within twenty years coastal erosion rates had increased to such an extent that in 1917 the village of Hallsands had completely disappeared into the sea, having previously suffered to a much more limited extent from erosion.

3. a) There appears to be an assumption that the collapse and retreat of the cliffs South of Pakefield church is primarily due to coastal erosion. However, the shape of the cliff profile – a steep or vertical upper section with a less steep debris (talus) slope at the base (photo 4 - below)



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4. (Photo 4 above – steep upper section of Pakefield cliffs and lower debris slope indicates that weathering of the loosely consolidated sandy cliff rather than marine erosion is likely to be the primary cause of cliff collapse)

suggests that the primary cause of cliff retreat is likely to be a combination of sub aerial (weathering) processes and various types of mass movements, with the collapsed material being subsequently removed by the sea. If cliff collapse had been primarily due to coastal erosion one would expect to see a quite different cliff profile – one that would normally be characterised either by a wholly vertical cliff or one with some evidence of undercutting. Such cliff profiles do exist only a few miles down the coast e.g. at Covehithe, where coastal erosion clearly is the primary cause of cliff retreat. However, at Pakefield such vertical cliff profiles are largely absent. Instead, there are cliff profiles more typically characteristic of

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weathering and slumping/rotational slip (i.e. sub aerial) processes being the main agent of cliff retreat.

b) This is extremely significant – as it means that cliff retreat can be controlled by a range of management approaches that have been demonstrated elsewhere to successfully slow and control rates of cliff collapse.

c) Such management approaches include at their most basic levels i) reduction in slope angle to produce a more stable slope ii) planting of vegetation on the slope iii) planting of marram grass at the base of the cliff in order to build up the beach and inhibit removal of collapse material by the sea.

d) The impact of such simple remedial measure can be clearly seen on the short stretch of coast between Kessingland and Pakefield. Towards the Kessingland end the cliff slopes are visibly gentler and vegetated. However, as soon as the vegetation ends part way between Kessingland and Pakefield, the cliffs become markedly steeper and clearly subject to more frequent collapse. (Photo 4 above and photo 5 below)



(Photo 5 Gentler and stabler cliff profiles at Kessingland end of the beach where the cliff slope is vegetated – thereby reducing the impact of sub aerial (weathering) processes on cliff collapse – compared with vertical/steep upper section and debris slope below on unvegetated cliffs at Pakefield end of beach).



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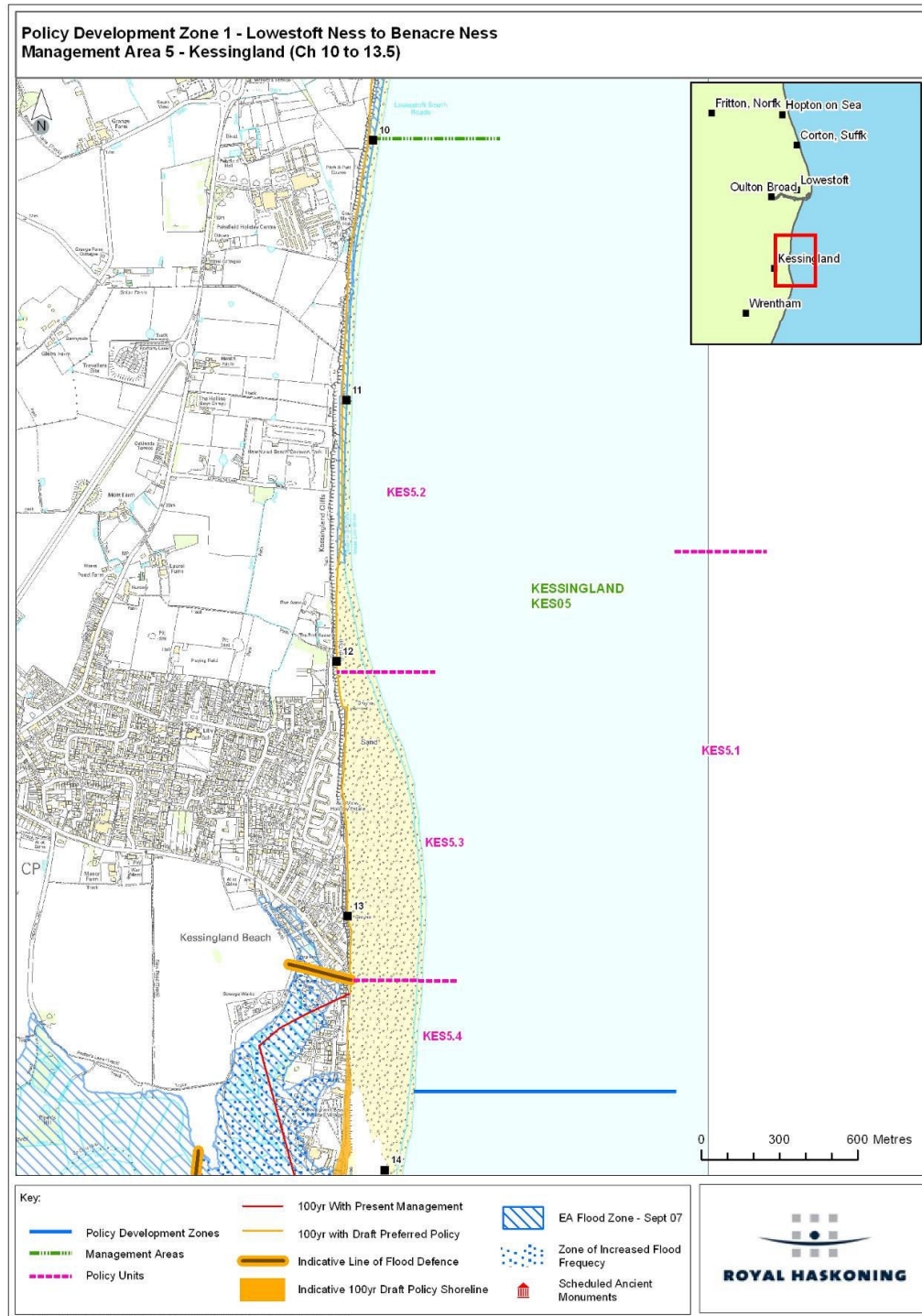
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#### **3. Kessingland**

4. The new shoreline management plan proposes a small amount of managed retreat around Benacre Sluice. The detail in the shoreline management plan suggests that this is little more than a technical realignment due to the gradual movement of 'Benacre Ness' towards Kessingland, thereby bringing the high water slightly more inland. However, there is one aspect related to this that does require careful rethinking. This is the sea defence clay wall that it is proposed will be built at the south east end of Kessingland. At the position on which this has been drawn on the Shore management plan map, this will effectively abandon both the residents of Holly Grange Road and Beach Road and the village sewage works to the sea. At the shoreline management plan consultation and exhibition held at Kessingland church hall on 7<sup>th</sup> July I was assured by the Environment Agency manager that the line had been drawn in the wrong place on the map. Whilst my own house in Kessingland is not one of those directly affected, I know that many residents of Kessingland would feel somewhat more reassured if the line could now be drawn on the right place on the map! It would therefore be appreciated if this could be confirmed in writing and a revised plan put in the final version of the new shoreline management plan which shows both the Kessingland sewage works and the houses on Holly Grange Road and Beach Road behind the proposed new clay bank.

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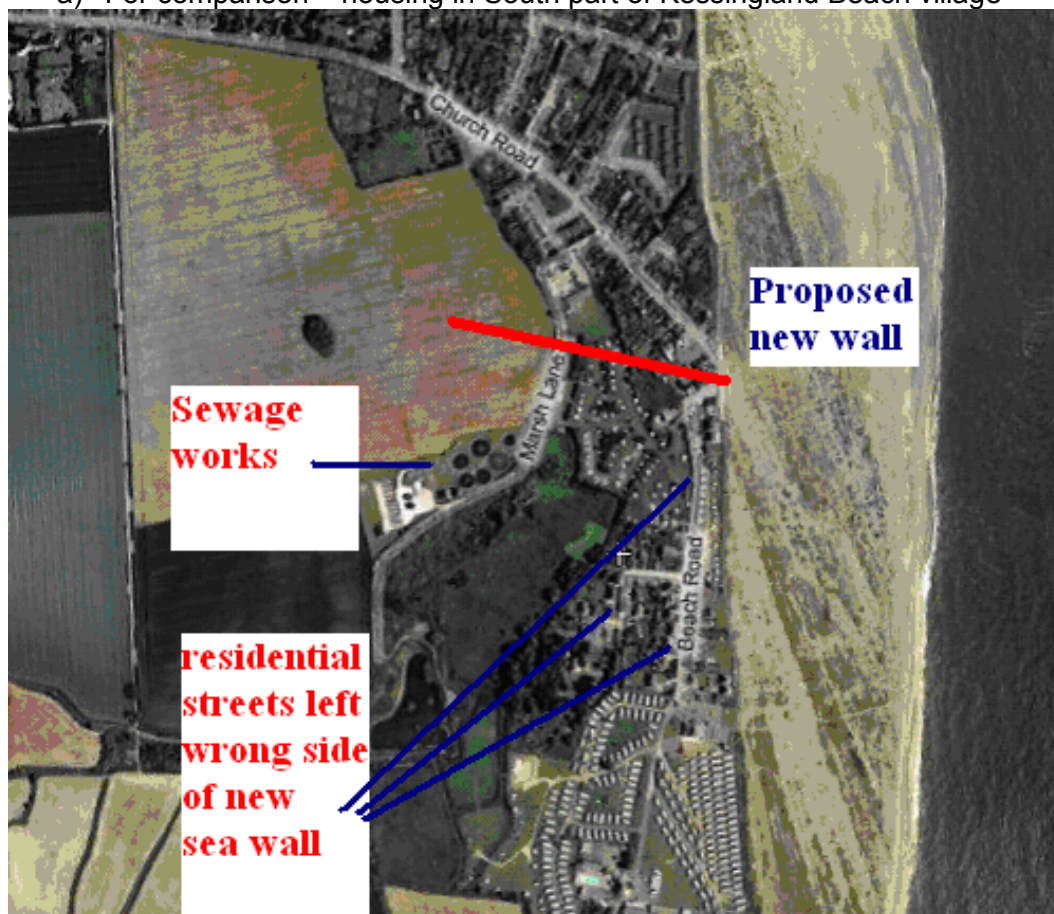


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a) For comparison – housing in South part of Kessingland Beach village

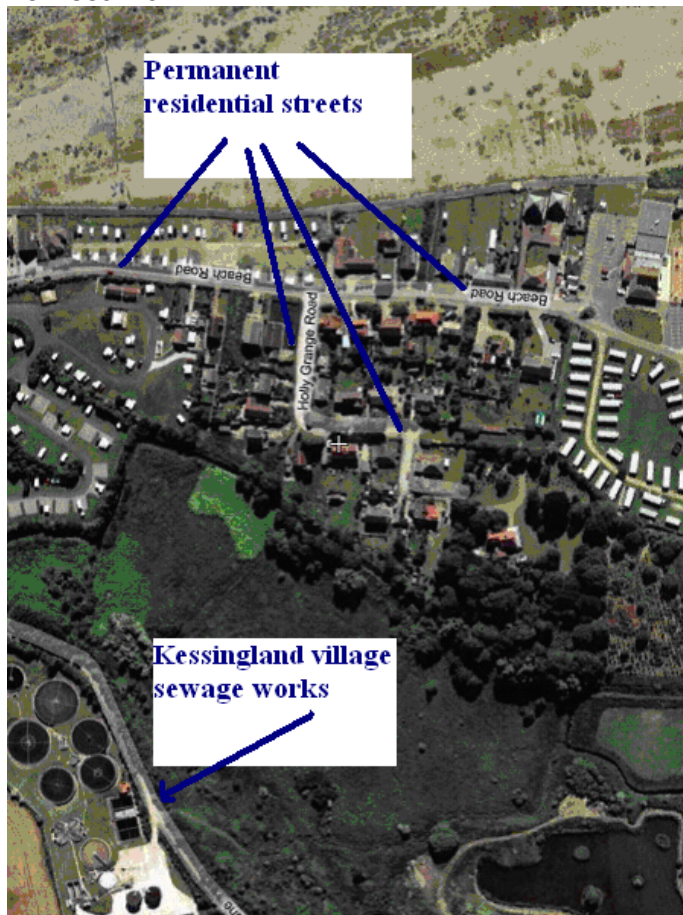


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Close up of Beach Road and Holly Grange Road and village sewage works – which the new shoreline management plan puts on the unprotected side of the proposed new sea wall.



#### References:

- D.L. Inman 'Shore processes' (1960) in Encyclopaedia of Science and Technology, New York:McGraw Hill
- J. Pethick *An Introduction to Coastal Geomorphology* (London:Edward Arnold,1984).
- H. Valentine 'Landloss in Holderness between 1852 and 1952' *Die Erde* 3, (1954) 296-315

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#### **From Suffolk Land Access Forum**

#### **DRAFT SHORELINE MANAGEMENT PLAN REVIEW**

##### 1. Introduction

The current Shoreline Management Plan (SMP) Review updates the original SMP which was produced in 1998. It forms part of Defra's strategy for flood defences. Since then more detailed strategic studies have been undertaken on parts of the Suffolk Coast (e.g. The Blyth Estuary) and more information is also available on the likely effects of climate change on sea level rise etc. together with a stricter economic regime.

The review allows for the development of coherent policies for flood and erosion risk management along the Suffolk Coast which address the risks to people and the developed, historic and natural environment in a sustainable manner and supports the Government aims set out in Defra's 2005 strategy "Making Space for Water"

- To reduce the threat of flooding and coastal erosion to people and their property
- To deliver the greatest environmental, social and economic benefit consistent with the Government's sustainable development principles

The following has been put together from leaflets obtained at one of the public exhibitions held in July.

##### 2. Summary of the Conclusions of the Draft SMP Review for Land and Property

###### a) Lowestoft to Southwold

The main centres of Lowestoft, Kessingland and Southwold will remain defended by maintaining sediment supply to the beaches in front of the main settlements with the SMP also aiming to maintain the use of the harbour and harbour entrance at Southwold. However the SMP proposes that the linear flood defences be moved back from the shoreline. It also indicates some areas where defence is not justified with the most significant area being at Covehithe in the next 40 – 50 years. In the short term properties would be at risk at Easton Bavents and in the long term at Pakefield Cliff. However the plan puts forward an approach to management to establish a more robust defence of much of the Kessingland Levels. The SMP for the Blyth Estuary closely reflects the recently produced strategy.

###### b) Southwold to Aldeburgh

Defences at the main centres of Walberswick and Aldeburgh are maintained, whilst at Thorpeness and Dunwich, although the main areas of property will be defended, those currently undefended may be at risk in the long term. The plan does not however rule out local small scale intervention as long as this doesn't have a negative impact on coastal processes. For the Alde/Ore estuary the SMP recognises



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there are many significant issues but at this stage only identifies the consequence of protection of the coast south of Slaughden leaving the finer detail to a more in-depth estuary strategy.

#### **c) Aldeburgh to Landguard**

Overall, the defence of the main centres of development including Felixstowe and the port are maintained, however in the long term the SMP indicates that there may be a need for adjustment to the approach to defence south of the built up area. The intent is also to protect Shingle Street and Felixstowe Ferry but there is likely to be increased risk of flooding in some areas and the possible loss of individual properties in the medium to long term. The plan also indicates that on this stretch of coast there is a potential loss of land from inundation or an impact on its value for agriculture due to increased risk of occasional flooding within the estuaries. Once again an estuary strategy needs to be undertaken for the Deben.

### **3. Summary of the conclusions of the Draft SMP implications on Nature Conservation, Landscape and the Historic Environment**

Unlike the implications for land and property, these conclusions are less site-specific.

The review highlights the aim for designated nature conservation sites to allow erosion of cliffs whilst maintaining the habitat at the crest or to maintain the balance between the conservation of freshwater and coastal features. There appears to be little scope to create major areas of new inland habitat, but the plan does recommend restricting extending defences into undeveloped areas of the coast and to take advantage of the control imposed by natural or manmade structures to maintain the natural development of shingle banks and the potential low lying areas behind.

In terms of landscape the plan aims to maintain the landscape character of the area by restricting further encroachment of defences over undefended areas and where there are defences to offer less intrusive measures to maintain the hinterland/shoreline interface.

The Plan recognises that there are areas where historic coastal features will be lost as there is no scope for defending these areas. In these circumstances there will be the need to record these features before they disappear.

### **4. Next steps**

Comments on the consultation phase of the Draft SMP Review need to be received by 30 September. Once the SMP has been finalised an Action Plan will be produced providing a focus and programme for future work around strategies, monitoring and works. The full plan can be viewed at [www.suffolksmp2.org.uk](http://www.suffolksmp2.org.uk)

### **5. The Suffolk Local Access Forum's perspective**

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Although the policies in the draft SMP will change see changes to the Suffolk coast over the next 100 years, it is noticeable that the effect of the plan on the current access for walkers, cyclists and horseriders through the rights of way network and particularly the Suffolk Coast Path is not considered. Neither are the likely effects on the local economy or agricultural land use.

As SLAF saw from its involvement in commenting on the Blyth Estuary Strategy and the subsequent site visit, an initial reaction to maintain the status quo may not on balance always be the best option and if a better and more sustainable coastline and coastal access route can be achieved through negotiation with landowners or as part of Natural England's national coast path project this would appear to be a better option than promoting and maintaining paths that may be subject to flooding in the short term or loss through erosion in the medium or long term.

The current approach to tackling coastal issues seems rather piecemeal, with the SMP lead being taken by Waveney and Suffolk Coastal District Councils using Royal Haskoning as consultants with some input from Natural England and the Environment Agency whilst the strategies for the estuaries seem to be led by the Environment Agency using consultants. There is yet another partnership looking at these and other issues via the Suffolk Integrated Coastal Zone Management Initiative (ICZM) which has a wider brief to look at social, economic and environmental interests and includes not only the district councils, Natural England and the Environment Agency but other organisations such as the Suffolk Coast and Heaths Unit, East of England Development Agency and the Government Office for the Eastern Region.

Unfortunately this draft SMP does not cover the whole of the Suffolk shoreline, excluded is the coast north of Lowestoft and significantly the Orwell and Stour estuaries which are included within an Essex based SMP although the Environment Agency has produced a flood protection strategy for Ipswich.

As SLAF, our response can only relate to the need to ensure that whatever the draft SMP proposes for any section of coastline and estuary, due regard is taken to ensure that an adequate rights of way network exists and to ensure that in consultation with Natural England not only a suitable coast path is provided but also adequate opportunity is provided for cyclists and horseriders to also access the Suffolk coast in the future. There is also a need to ensure compatibility between the various coast and estuary related studies and it would seem advisable to start work on strategies for all the Suffolk estuaries as soon as possible in order that this can be achieved.

#### **6. The Suffolk Local Access Forum's response**

The Suffolk Local Access Forum:

- a) welcomes the draft update of the SMP
- b) would request that the effect of the proposals on the rights of way network and other public access within the coastal zone is given further consideration by SCDC within the SMP

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- c) asks for a commitment from SCDC to replace or enhance PRowS threatened by the coastal change process
- d) wish to see the implications of the effect of the proposals on the proposed national Coast Path discussed with Natural England
- e) regrets that the shoreline north of Lowestoft and the Orwell and Stour estuaries are not included within the SMP
- f) would wish to see compatibility between the SMP, estuary strategies and the ICZM study



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#### **From Bawdsey Parish Council**

Dear Mr. Oakes

**Reference     Shoreline Management Plan 2  
                    Draft June 2009 – Sub Cell 3C**

Bawdsey Parish Council (BPC) has monitored this document throughout its preparation, and has attended several review meetings and followed these up with review comments. At a meeting on 22 September Bawdsey Parish council considered the June 2009 final Draft and these are the comments arising from that meeting:

1. Bawdsey Parish Council is broadly in agreement with the SMP2, particularly as it relates to the Bawsdey Coastline. However, there are still a few issues we are concerned about which are made below.
2. The Council has concerns about finalising SMP2 before the conclusion and agreement of the Alde and Ore Estuary Study and the A and O Futures study. The link between these studies and SMP2 is particularly important in the case of Shingle Street where the effect of a breach at Slaughden, whether natural or man-made, on the protection provided by the river to the north end of Shingle Street is, in our view, underplayed. It should also be noted that the breakdown of river defences behind Shingle Street near the river mouth presents a possibly greater risk to the community than flooding from the sea.
3. The Council understands that during the first epoch the intent of the proposed policy of 'managed realignment' is to respond to any changed conditions in the river mouth in order to maintain 'the semi natural and unique quality and community of Shingle Street' as stated in the SMP2 objectives. The workings of this realignment policy should be made clearer. We do not think that this intention is presented strongly enough and that it should be emphasized in the policy summary.
4. The Council thinks that there should be a commitment to review the policy following publication and agreement of the estuary study, and to on-going reviews say every two years during epoch 1. A proposed timetable should be set out in the SMP.
5. The Council would welcome more details about the possible defences which may be put in place at Shingle Street. What are 'breastworks'? Several experiments are in hand for protection of shingle beaches both in Suffolk and Holland which are sympathetic to the environment.
6. Bawdsey Parish Council welcomes the designations of Hold the Line at East Lane and at Shingle Street for epochs 2 and 3 and effectively Holding the Entrance to the River Deben.

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7. The Council believes the document does not adequately stress the value of the agricultural land in this coastal area. The farms along the coastline are now significant producers of potatoes and salad crops. With food shortages likely to accompany global warming and continued population growth, this land could become extremely valuable to the country and yet it is usually dismissed as mere agricultural land.
8. In Section 3.2.2 Economic Sustainability – the document effectively states that the Country just cannot afford to protect coastal people. Coastal communities do not agree with this view, when they see billions spent on say defending the Falkland Islands or invading Iraq. The reality is that Government currently chooses not to protect coastal people, even though in reality they are not asking for miles of sea walls but for just a few key points to be protected. In the next section – 3.2.4 Social Justice – it hints at the unfairness in this position but states that Government powers to build sea defences are merely permissive and therefore they have no responsibility to protect coastal communities. This is clearly not social justice. If a government decides to build a motorway and you lose your house, you are compensated. If a government decides not to maintain an existing sea wall and you lose your home, you are (currently!) not compensated. The SMP as a major document about the Coast and its Communities should more clearly state the lack of natural justice in this current anomaly.

Yours sincerely

Louise Lennard (Mrs)  
Clerk to Bawdsey Parish Council

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#### **From Suffolk County Council**

#### **Suffolk County Council response to the Draft Shoreline Management Plan Sub-Cell 3c (Lowestoft Ness to Languard Point)**

##### **General comments:**

- Suffolk County Council strongly believes that the SMP cannot be regarded in isolation and that an integrated approach to managing the coastline, the estuaries and the hinterland is essential. The current Alde-Ore Futures (Integrated Coastal Zone Management) project is an example of the way forward. The SMP can only be regarded as one aspect of coastal management and must be sufficiently adaptable to take into account other plans and the objectives of local communities. We trust that the public consultation on this SMP will take heed of public concerns and policies will be amended accordingly.
- The County Council believes that a Hold the Line policy should be used as the default policy in the first epoch, wherever a feasible option exists, whether national funding would be available or not. This would allow time to find appropriate local solutions for social and environmental adaptation. Changes such as roll-back of properties/ communities and the creation of compensatory habitat will take many years to achieve.
- The County Council is concerned that whilst the stated SMP policy is Hold the Line or Managed Realignment, there is no guarantee of the funding to enact these policies. Policies must, therefore, be sufficiently flexible to encourage local and private action and investment.
- Where local action could be undertaken without adverse consequence elsewhere, a Hold the Line policy would make more sense (with the proviso that national funding is unlikely) rather than one of No Active Intervention. For example, BLY 10.1 has a No Active Intervention policy, yet current activities by local landowners and the Blyth Estuary Group is effectively a Hold the Line policy - at least in the short to medium term. The policy should be amended accordingly.
- The current SMP is clearly developed using guidance from Defra and linked to the current funding criteria for flood and coastal risk management. The guidance is flawed in that it looks at the coastline in isolation from the hinterland and fails to properly value the coastal assets in a wider context. Government policy and funding are ever-changing and it would be wrong to implement policies that cannot be reversed under different circumstances. As an example, the government is currently developing a new policy on food security in the light of climate change – which could affect the national view on losses of coastal agricultural land.
- The County Council expects the SMP to be reviewed and amended in response to actual changes over the 100 year timescale. There are many

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assumptions underpinning the SMP which could change, and the policies must remain sufficiently flexible to allow amendment in the light of new knowledge of climate change and coastal processes, public or political opinions and associated funding. It is worth remembering that land once lost to the sea will never be recovered.

- The SMP does not appear to effectively identify and evaluate the nature or extent of **all** the assets within the study area. Whilst it shows a clear understanding of the national and internationally designated biodiversity assets, it is weak when considering the landscape and other biodiversity assets, as well as issues of access, the historic environment and the value of community assets. Before it becomes acceptable to the County Council the SMP must re-evaluate all assets on a Suffolk-wide basis and be clearer in the way it links with estuary, spatial and other objectives/plans. Such an overview must include valuation of undesignated habitat/historic assets, landscape impacts, loss of agricultural production capacity, tourism/access and the like, and include those parts of Suffolk being considered under the Essex SMP - in order to assess the countywide impact of the changes/losses resulting from the proposed policies.
- SCC recognises the importance of detailed discussions relating to the action plan and specific schemes related to the delivery of the SMP and will remain fully involved at all levels.

#### **Links to Estuary plans**

- There is a fundamental flaw in the production of the SMP, in that it fails to properly link the management of the shoreline with that of Suffolk's estuaries. SMP 3d (Essex) is being produced covering the coast and estuaries together, which is a much more integrated approach. The adoption of the Suffolk SMP should be delayed until the estuarine plans can be properly integrated with coastal management.
- For example, the Hold the Line policies in the mouth of the Deben (DEB 17.3/17.4), and the resultant loss of salt marsh through coastal squeeze, will put a lot of pressure on the forthcoming estuary strategy for realignment higher up the estuary. This effectively predetermines what the estuary strategy will need to say - which goes against the current landowner based approach being encouraged by all parties involved in the Integrated Coastal Zone Management Project. Conversely, the estuary plan may drastically affect tidal flow and thus the ability to implement a Hold the Line policy at the mouth, thus the two must to be considered as a whole.
- The County Council welcomes the integrated approach being taken on the Alde/Ore in trying to assess the impacts of the SMP, estuary plans and wider community planning as a whole. The SMP recognises that a breach is likely somewhere on the Alde/Ore, and a community based decision to this is preferable to one being dictated by the SMP. It is imperative that nothing is

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written in the SMP that cannot be amended in the light of this community work and the Aldeburgh Coast and Estuaries Strategy (ACES).

- It is not clear if the consequential upstream effects of coastal policies have been fully considered. For example, has there been proper integration of the SMP and catchment flood management plans in relation to the Minsmere and Kessingland levels?

#### **Landscape, Biodiversity and the Area of Outstanding National Beauty (AONB)**

- Landscape is not just about natural habitats. It is about the footprint of man over millennia and how that has shaped the habitats into what we see today. It is about the cultural aspects of the area and its sense of place. Landscape change is ongoing and whilst there is no aspiration to preserve it as such, it never has been thus. The SMP does not appear to fully understand the value and richness of what is being changed and or lost. (Refer to “*The Suffolk Coast and Heaths Landscape*” Countryside Commission 1993 and the *Waveney and Great Yarmouth Landscape Character Assessment 2008* the *Suffolk Landscape Character Assessment 2008* as well as a set of Landscape Guidance produced for the AONB unit in 2001.)
- The County Council recognises the difficult decisions needed in assessing whether policies are beneficial or not to the landscape. It is a subjective judgement whether additional rock armour at East Lane, that will protect the land behind the wider bay, is a positive contribution or not in an area designated for its soft and dynamic coast. Similarly it is hard to judge if allowing erosion at Easton Bavents is positive given the loss of properties, agricultural land and historic assets. The result is that there appears to be contradictions within the SMP. The County Council feel it is imperative that the process to come to these conclusions is open and available to examination and that the SMP should be amended in the light of local views expressed in response to this public consultation.
- The County Council’s view is that it is inaccurate for the SMP to state that the proposed policies will be positive for the environment overall (Strategic Environmental Assessment, page 55). Parts of the designated AONB will be lost or changed forever. Freshwater habitats and agricultural land will be lost (or devalued by saltwater intrusion), small isolated communities will be more at risk and the visual appearance of the coast will change. These are all part of the environment and landscape and the reasons behind the AONB designation.
- For clearly understandable reasons the report has focused attention on the key internationally designated sites. However, this underplays the importance of capturing the contribution of other locally designated sites and non designated habitats to the biodiversity of study area. The close proximity of a wide range of habitats and landscape types means that the designated sites and the surrounding land have a wildlife value enhanced by heterogeneity.

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- Loss of designated freshwater habitats along the Suffolk coast (including areas included in the Essex SMP) is of particular concern for two reasons. Firstly, it is unlikely that these will be recreated in the coastal strip and thus the landscape will be less diverse, and secondly because of the potential impact on other valuable habitats/landscapes elsewhere.

#### **Economy**

- Suffolk's coastal economy is largely based on tourism, agriculture and numerous small local businesses. The County Council believes many assets have been undervalued and that the SMP fails to adequately assess the value of assets in a wider context. The total amount of land lost, through erosion or saline intrusion, may not be vast. However, the resulting impact on the landscape, transport infrastructure, tourism, local businesses, community assets and agricultural production may be significant. For example, a farm losing a proportion of its productive land may be rendered unviable and local production of specialist crops could end up being moved out of Suffolk – maybe overseas.
- The impact of the SMP policies on development of coastal towns and villages is uncertain. The Hold the Line policy around Lowestoft suggests a positive future for the town, but the SMP notes an increased flood risk and urges caution over residential development – which will be difficult for any planning authority to ignore. The changes proposed in the Communities and Local Government's new policy on planning and coastal development (updated PPS25) suggest a greater influence for the SMP and it is therefore necessary to ensure that SMP policies have regard to those within the Regional Spatial Strategy or Local Development Frameworks. The links between the SMP and statutory planning documents are not made clear in the document.
- In a number of places, coastal assets will need to be relocated – e.g. public rights of way and other informal access and car parks. It appears the costs and disruption involved in undertaking a managed realignment policy has not been properly assessed in the SMP development. This is an important part of the cost-benefit analysis needed to develop coastal policies.
- Saline intrusion of underground water sources is of serious concern as this could negatively impact on the ability to irrigate of high-value crops in the coastal strip. The accessibility of alternative sources and impacts of losing the existing ones needs to be factored into the assessment of the SMP.

#### **Tourism and Public Access**

- Part of the re-evaluation of assets needs to be the value of the landscape and access to tourism. The total tourism value of the Suffolk Coast and Heaths Area of Natural Beauty was £166 million (East of England Tourism, 2006). The effect of No Active Intervention or realignment policies on this value of the landscape in economic terms is missing. For example the value of the Aldeburgh to Thorpeness Road. This is not about preserving this popular

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tourist route in aspic, but being fully aware of the costs and consequences of change.

- Public access to the coast and its hinterland is a key asset and part of the coastal infrastructure. Public rights of way and other informal access will be lost by managed realignment and any loss without alternative public access being put in place will have a detrimental effect on both the ability of local communities to enjoy their natural environment and the attraction of the area to tourists, with consequent negative effects on the local economy.
- The County Council expects a higher profile to be given to access within the SMP, and that a policy is established that where Public Rights of Way and other access are lost, measures are put in place to replace and where possible enhance the access, and appropriate compensation provided to land managers as part of the overall mitigation measures.
- The Suffolk Coast Path is an important asset both for the local community and visitors. If the coastline is to change, there will be a need for detailed discussions around re-routing this path and the associated costs.
- There is a need to clarify how Natural England's Coastal Access proposals are linked to the SMP. In many places, the SMP policies will make access more difficult.
- The following are area specific comments relating to public access routes which need to be properly assessed and considered in the SMP and resultant schemes:
  - PDZ2: Potters Bridge area. Access is already restricted at times due to flooding, and there is a need to seek improvements to the coastal path with potential diversion of route. Loss of key access links at Covehithe, a popular tourist route.
  - PDZ3: Loss of part of the network due to increased flooding around Dunwich river paths, Dingle Marshes, Corporation Marshes, Buss Creek and Tinkers Marsh which will need to be addressed.
  - PDZ4: Permanent realignment of path will be needed at Coney Hill cross bank in the future as the existing path is likely to be lost – the route would be as per the temporary diversion.
  - PDZ5: Potential loss of access to Alde and Ore Estuary routes and paths around Sudbourne Marshes, due to increased flooding. Realignment of beach route at Thorpeness maybe required.
  - PDZ6: Potential loss of rights of way network around Hollesley Bay and Deben estuary. Currently there is limited access at Bawdesy due to ongoing erosion issues which will worsen over time.

#### **Archaeology and Historic Assets**

- There is a serious gap in the national strategy for dealing with the loss of historic environment assets on the coast. No funding is available for mitigation – either the relocation of historic assets if feasible and/or their recording before loss.

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- The development of the SMP has severely undervalued the historic environment, failing to take into account the actual cost of relocating or recording the asset, as well as the cost to the local economy of the loss. For example, the recording of Covehithe (upstanding buildings including the medieval church and the below ground archaeology) plus Dunwich (the upstanding medieval Greyfriars Scheduled Ancient Monument and the below ground archaeological deposits) would cost £ millions. It is difficult to understand how the loss of these valuable assets can be reconciled with the fact that causing damage to a Scheduled Ancient Monument is a criminal offence!
- As a high level strategy the SMP identifies and gives some consideration to designated scheduled monuments, but there is no attempt to assess these monuments in their landscape setting or in relation to each other or to other less significant historic assets. Although the coastal grazing marshes are an essentially artificial landscape their significance as such seems not to be considered. For example, the landscape loss of Leiston first abbey is seen in landscape terms as the loss of a single 'small chapel' (SEA, 5.4.4) ignoring the relationship of the abbey site on its island with adjacent early reclaimed marshland.
- The County Council feels the SEA scoring system needs to be challenged with regard to the assessment of the historical environment. Within the document the destruction of regionally important assets has been allocated as a "minor positive" outcome. This is at odds to other similar assessments of our built heritage.
- The following should be noted in relation to historic assets and the SMP re-evaluated accordingly:-
  - PDZ 1: LOW 04 includes reference to the policy of No Active Intervention at Pakefield Cliffs encouraging fresh exposures for study. This should be in KES05, the site of the internationally important Palaeolithic material being south of the management area division. There is significant potential loss of a Roman site on the top of the cliff at the division between the areas LOW04 and KES05. This is a typical example of a site that is undesignated because it has not been archaeologically assessed.
  - PDZ2: This zone has been seriously undervalued in heritage terms, with no mention of heritage/historic environment in the stakeholder objectives and underscoring in the SEA, due largely to over-reliance on designation datasets. The northern part includes at least one archaeological site known only from surface finds. The southern part encompasses the loss of an entire medieval (and potentially earlier) settlement at Covehithe plus its likely harbor area on Covehithe Broad. Assessment is based solely on the upstanding features (church etc) and uncertainty as to whether erosion will reach this far in 100 years, resulting in a comment that the overall effect will be neutral. This fails to recognise the evidence that the settlement was formerly much larger and thus the archaeological deposits will be lost imminently.
  - PDZ3: At the north end there have been substantial medieval and prehistoric finds. PDZ3/PDZ4: At Dunwich there is a major omission in the Strategic Environmental Assessment as the nationally important Greyfriars Monastery



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has been completely omitted, falling as it does just south of the PDZ3/PDZ4 line. The text refers to it (PDZ3:32) but only in terms of the upstanding ruin rather than the site as a whole. The estimated cost for full recording by excavation of this site was estimated at £1million, 10 years ago.

- *PDZ4*: Leiston first abbey is noted but without also noting that the marshland immediately to its south is also of historic importance.
- *PDZ5*: The importance of Slaughden Martello tower as a unique structure is recognised and if a breach is engineered it will be placed to protect this feature; presumably a natural breach might not be so well placed. This issue, and the impact of a breach on the estuarine sites and landscapes, needs further consideration. There appears to be no heritage assessment for the remainder of Orford Ness, despite the historic significance of the 20<sup>th</sup> century installations here.

#### Highways

- The economic impact of increased flooding of local roads, and thus the need to raise or reroute them, does not appear to have been properly considered within the appraisal. This was a fundamental flaw in the development of the Blyth Estuary Strategy and a mistake that should not be repeated elsewhere.
- The following roads appear to be impacted by increased flood risk:–

B1127 at Potters Bridge  
Road into Southwold  
C road between Dunwich and Blythburgh  
Reckford Bridge at Middleton  
B1122 into Sizewell  
C346 at Bawdsey.

- As a rough guide Suffolk County Council Highways Department estimates that raising the B1127 would cost over £2million today, thus the overall impact of policies in the longer term could prove very costly.
- Flooding to highways is not just a local nuisance but can seriously impact economic activity as well as have safety implications. Even where it is not necessary to undertake major road-raising, increased flood risk will almost always result in additional costs of repair and clearing after a flood event.

I am happy to discuss any of these points further as appropriate.

Yours sincerely,

Jane Burch  
on behalf of Councillor Guy McGregor

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#### **Response 7**

##### **With reference to Draft 8. SMP 2.**

We appreciate the South Warren cliffs at Easton Bavents being upgraded to MR, it should be HTL to fulfil your primary stated intentions to protect human habitat at Easton Bavents. Thank you for the change, it helps, gives our homes a chance of a future.

Looking back at our letter of 17/4/09 many of the observations are still relevant and Points 1 to 8 are in no way resolved. The abuse of the HR of the owners of Thursley continues, it even appears that the whims of NE are now being used to nullify the owners right to pursue the matter by Appeal to the Minister. The abuse is sickening.

As some members of your committee know discussions have been taking place between NE, WDC, EA and ourselves. These are in an early stage but should produce a sustainable situation without detriment to adjacent areas.

Referring to point 2, the position of the owners of Benacre Estate has changed over recent times, due too certain sad events, which means a further urgent interest in the future now exists. This Gregor was made aware of prior to Draft 8. I was party to the conversation that took place at Westminster. Frustrating as it may be to yourselves, this should have been, but has not been taken into account. Your present draft deny the Benacre Estate owners, several major basic rights, it is already immoral to assure the destruction of this area and your proposals are unlawful in its present form.

Any destruction of this nation cannot be counted as conservation or sanely as a matter of outstanding public interest, for the love of destruction is the product of fanatical minds. In relationship to the Ness moving Northwards, it is now in the position of Max public benefit protecting Kessingland village, therefore a reduction in feed to it may help stabilize it in its present position. The village cannot be rolled back, caravan sites can, without risk to the built environment of Pakefield which appears to be adequately protected.

If Benacre remains subject to its present state of rapid erosion, without strengthening the protection of the sluice and partial protection of the cliffs damage will happen. The beach North of the sluice will be rapidly eroded, the protection of the low lying areas will be lost. Covehithe village will be lost in an unnecessary short time, let alone the loss to the owners and the nation of agricultural land and major damage and losses to the environment. Please do not block the future by classifying the area NAI.

Referring to point 3, you now have my solicitors letter, which may help to clarify the matter.

Referring to point 7, for some weeks the sheet toe piling has again been excessively exposed this is only September, one of the major intentions of modifying the Sea defence of the area was to safeguard this wall. Regrettably the work in this section has been unfit for purpose. In the early stages eight groynes were proposed for the

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Easton Marsh sea wall, when I enquired I was told that there would be one more than existed at the time, increasing the number from seven to eight. I have been asked to give it three years for the system to settle down and we have been exposed to up to fivefold increase in erosion rates. This is as urgent matter which should be exposed in the SMP and the system faults rectified, it won't just go away as some people hope, without a fight every inch of the way.

A further matter very relevant is the fact past projections of likely erosion rates were considerably greater than those projected in your Draft SMP. If the previous projections were right we are all being misled by your new projections, less may look nice on paper, any loss is a curse on the nation.

*See also comment below, received later:*

#### **SMP an apology.**

Dear Gregor

I accidentally made a mistake in my submission to Terry Oakes re the SMP in the 4th paragraph quoted below.

(Referring to point 2, the position of the owners of Benacre Estate has changed over recent times, due too certain sad events, which means a further urgent interest in the future now exists. This Gregor was made aware of prior to Draft 8. I was party to the conversation that took place at Westminster. Frustrating as it may be to yourselves, this should have been, but has not been taken into account. Your present draft deny the Benacre Estate owners, several major basic rights, it is already immoral to assure the destruction of this area and your proposals will be unlawful in its present form.)

I apologize for the error. You were not to my knowledge aware of the Estates decisions before Draft 8 was released. The meeting at Westminster was 2 days after I had viewed Draft 8.

Other than for this fact, the position is unchanged, the proposed SMP's has a drastic effect. If interested constant contact was maintained with the landowners and those who's future's are closely involved in the outcome of the SMP. It is possible that the urgent interest of all of us would be known earlier.

Sadly all the listening after decisions have been made, rarely help us, our words often fall on barren ground. This is terribly wrong, for unless action is taken in consideration of our rightful needs, our futures are dictated to us without the civilized right of defense

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#### **From the RSPB**

##### **Suffolk Shoreline Management Plan2 – comment on draft policies October 5<sup>th</sup> 2009.**

The Royal Society for the Protection of Birds (the RSPB) is the charity that takes action for wild birds and the environment. We are the largest wildlife conservation organisation in Europe with over one million members and take a keen interest in coastal planning at all levels. We own or manage approximately over 12,000 hectares of land for nature conservation on 22 reserves in the East of England, including many coastal sites. We believe that sustainability should be at the heart of decision-making and is therefore commenting on each of the Shoreline Management Plans covering the East of England coastline.

A common problem with the Appropriate Assessment (AA) is that it does not identify habitat baselines; these should be added so that where a transition is expected this could be measured and reviewed. The AA should include the areas (ha) to be compensated by habitat and qualified in terms of International features. Considering all of the Policy Development Zones (PDZ) in detail, the RSPB has the following comments:

#### **PDZ 2 Benacre to Easton Broad**

The RSPB understands that the following is proposed for this area; Ben 6.1, HTL, MR and MR, 6.2 HTL, MR and MR – 3, MR , MR, MR . Set back defence by year 20, Kessingland levels defence would be moved back habitat creation opportunities on the Kessingland Levels for inter-tidal habitats and shingle. Anticipated loss of some brackish inter-tidal and saline lagoon habitats due to “natural change”.

The RSPB is supportive of MR in this location with inter-tidal habitat creation but considers that habitat restoration of high quality grazing marsh in the western part of this area should also be considered. Where there is unavoidable loss of European sites or interest features and there is no alternative solution, the RSPB expects that compensatory habitat should be provided. It is not sufficient to state that because the habitats are viewed as ephemeral and the policy promotes the natural behaviour of the coast that this is equivalent to no adverse effect on the integrity of the site. If there is no certainty that coastal lagoons will form naturally as part of the dynamic coastal environment, then compensatory measures should be undertaken to ensure that there is no net loss of the overall coastal lagoon resource.

#### **Cov 7.1 and 7.2**

The RSPB understands that the following is proposed for this area; greater increased probability of flooding in these zones with an NAI approach from the beginning. Much greater flood risk, under draft preferred policy. The loss of saline lagoons (SAC

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feature) is part of “natural change” and therefore not an adverse effect on integrity of the site. The vegetated shingle ridge and little terns (part of the SPA and RAMSAR feature) should benefit from the proposed management, key concern is the loss of reedbed and impacts upon the SPA features associated with this namely bittern and marsh harrier. Compensatory habitat to be addressed through RHCP.

It is stated that the Benacre, Covehithe Broad and Easton saline lagoons may move landward, if there is no certainty that coastal lagoons will form naturally as part of the dynamic coastal environment, then compensatory measures should be undertaken to ensure that there is no net loss of the overall coastal lagoon resource.

Regarding the impact upon the freshwater reedbed, the EA should be quantifying how much is to be lost, exactly what features it supports and implementing sufficient compensation on alternative sites. The RSPB would argue the effect is already happening and it is an entirely predictable adverse effect occurring on the freshwater SPA habitats.

#### **PDZ3 Easton Broad to Dunwich Cliffs**

The RSPB understands that for Bly. 9.5 Walberswick dunes, Appropriate Assessment (AA) is proposed at a scheme level, the AA will ensure that MR in this location will not constrain the natural development of the shingle beach to the south. However, the RSPB view is that the assessment should not defer to the scheme level AA. In particular, the effect of the preferred options for the Southwold Harbour training walls should be assessed as we would expect that any change to these would have an adverse impact on the SPA frontage to the south, and consequent impacts upon the fresh and saline habitats behind.

The RSPB understand the following policies are proposed for this area; for Bly. 10.1 MR maintaining northern defences subject to funding; Bly 10.2 HTL improve defences and Bly 10.3 NAI.

The RSPB believes that the shift in habitat composition that has occurred on Tinkers Marsh (10.1) is a direct result of the flood defence decision not to repair river walls and that this should be adequately compensated. The habitat should be compensated from its original form, freshwater habitat with its associated features especially for breeding avocet.

HTL policy at 10.2 will cause a loss of inter-tidal habitat due to coastal squeeze, this will need to be compensated and it has been suggested that inter-tidal habitat is created at Tinkers Marsh. The RSPB is concerned this could be a significant area of

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inter-tidal habitat to be lost and compensated for at Tinkers Marsh, detail is sought from the EA to qualify and quantify the impacts and the compensation proposed.

The RSPB is unclear as to exact proposals for Dunwich 11.2 Walberswick marshes 2025, 2055 and 2105, in the SMP it is stated as MR in accordance with the draft SMP March 09. However, in the Strategic Environmental Assessment an NAI approach is referred to and in the AA for Dun. 11.2, NAI is the proposed management.

The RSPB is supportive of MR in as much as this option allows for intervention to reduce the area impacted by saline incursion. MR is appropriate, as management is proposed for the landward side of the ridge in terms of the other works to the walls and in case there is any emergency work needed e.g. the Dunwich river fills with shingle. The RSPB is not supportive of NAI in this location.

The RSPB does not accept that the "the movement of the shingle ridge would lead to the loss of saline lagoons but this is considered acceptable in regard to enabling the natural evolution of the shingle areas and is considered loss through natural change". The saline lagoons support Annex 1 species of European importance associated with the Minsmere and Walberswick Heaths and Marshes SPA such as breeding avocet, as well as a waterfowl assemblage. The impact upon these interest features should be quantified and the need for appropriate compensatory habitat identified.. Furthermore the active withdrawal of management from the shingle ridge is already having a detrimental impact upon this habitat and may do so further as the ridge expands further. More proactive management of the Dunwich river (re-routing the river as we have previously advocated so that it does not become blocked with shingle, impeding drainage and causing additional inappropriate flooding of the marshes) may allow, at least temporarily, the evolution of the saline lagoons further inland. This would have the dual purpose of preventing unwanted flooding of the other habitats such as grazing marsh that also support birds associated with the SPA.

The plan states that the new defence line seaward of Westwood Marshes (Dunwich rear defences) will protect the freshwater features landward of this throughout epoch 3, but freshwater habitat seaward of this will be lost through epochs 1 and 2. It is the RSPB's understanding that the freshwater habitats of Point, East Hill and Old Town marshes would be maintained for the next 20 years exceeding epoch 1 until compensatory reedbed habitat is functioning. Loss during epoch 2 we have accepted as long as the compensatory habitat is functioning. The area (ha.) requiring compensation and the SPA features associated with this should be quantified in the AA and included within the SMP.

Finally, the protected reedbeds should remain freshwater in character, *Phragmites australis* may become tolerant of brackish conditions but bittern and their prey

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species associated with the reedbeds are not. Therefore allowing any of the reedbeds to become brackish would be an adverse effect on the integrity of the SPA.

#### **PDZ 4 Dunwich Cliffs to Thorpeness**

The RSPB understands that the proposed policies for the Minsmere Policy area are; 12.1 NAI for 2025, 2055 and 2105, for 12.2 MR for 2025, 2055 and NAI for 2105, for 12.3 and 12.4 MR for 2025, 2055 and 2105.

The AA tables (and possibly assessment?) have not been updated with the above proposed management approaches. The RSPBs understanding and acceptance of the preferred option for Minsmere Flood Risk Management Project is that North marsh is likely to remain in situ, with damage to the frontage repaired where practical, for the next 20 years. During this time, compensatory habitat will be sought by the EA and that this should be functioning before any damage is allowed to the freshwater habitat. We do not expect this unit 12.2 to be breached within the next 20 years, as the AA states. Also as part of the preferred option the RSPB expects that improvements will be made to Coney Hill Cross bank to ensure protection against flooding for at least a further 50 years to the rest of the reserve.

The RSPB is concerned that in the AA table, it is stated that “Managed realignment across the Minsmere valley Min 12.2, 12.3 and 12.4 may in epoch 3 lead to increased saline flooding and potential longer term breach throughout the Minsmere Valley leading to the loss of freshwater lagoons (bittern habitat)”. The RSPB would oppose larger scale realignment over Minsmere, unless it was demonstrated to be unavoidable, which it hasn't so far.

For Min13.1 HTL is proposed, the RSPB understands that the protection to the power stations is important but are concerned that indirect adverse effects are not caused to the SPA as a consequence of this policy. This should be considered as part of the AA.

#### **PDZ 5 Ald 14.1 – 14.3 Thorpeness to Aldeburgh**

The proposed policy at Slaughen (14.4) is currently HTL for all three epochs, the RSPB supports until the Alde and Ore Estuary Strategy is further evolved, however the inherent uncertainty of awaiting the outcome of the estuary strategy does not allow a conclusion of no adverse effect to be made.

Orf. 15.1 Sudbourne Beach to Orford Ness

AA and proposed policy section are not consistent, AA recommends no policy currently as to be informed by estuary strategy and concludes it cannot be

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appropriately assessed. The policy section considers HTL until 2025 and NAI for 2055 and 2105. If the latter is correct, the RSPB is concerned about the unsustainable practice of removing shingle further south on Orford Ness to recharge this area of the Ness. This is potentially damaging to the Orford Ness Shingle Street SAC and birds associated with the Alde-Ore Estuary Ramsar and SPA and an adverse effect cannot be dismissed. Suitable compensatory habitat should be sought or an alternative source of shingle identified.

The RSPB views the evolving Alde to Ore strategy as being key in identifying the impacts upon the estuary relevant to this and the next section of coastline.

#### **15.2 Orford Ness**

Both NAI for 15.1 and 15.2 will allow for a greater risk of flooding to this section of the Ness and we accept that the NAI will allow for natural processes to erode and deposit shingle maintaining the site.

#### **PDZ 6 Orford Ness to Cobbolds Point**

The proposed policies for this section are:

- 16.1 Orford Beach, 2025 NAI, 2055 NAI, and 2105 NAI.
- 16.2 North Weir Point 2025 MR, 2055 MR and 2105 NAI
- 16.3 Shingle Street 2025 MR, 2055 HTL and 2105 HTL
- 16.4 Hollesley Bay 2025, MR, 2055 MR and 2105 MR
- 16.5 East Lane 2025 HTL, 2055 HTL and 2105 HTL
- 16.6 Bawdsey Hill 2025 NAI, 2055 NAI and 2105 NAI

16.1 Appears to be a continuation of 15.2 policy and does not reduce/alter the current coastline. However, the RSPB seeks clarity on the approach to Halvergate Island and the potential impacts upon the RSPB reserve.

16.3 Shingle Street proposed policy is linked closely to the management of East Lane 16.5 and specifically the maintenance of a control point at 16.5 which the RSPB would support. The AA does not identify any losses to the Orford Ness Shingle Street SAC (principally shingle and saline lagoon systems) although it acknowledges that this is a risk. The preventative measures to avoid an adverse effect, of a future site-specific study by the EA and NE to monitor the effects of policy 16.3 to 16.6 should be sufficient to respond to any changes. The RSPB would expect this to ensure no adverse effect upon both the shingle and saline lagoon features. No adverse effect cannot be concluded however at this stage by the SMP AA until a definite commitment to undertake and fund this study has been agreed.



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#### **17. 3 Lower Estuary Deben**

The proposed policy for this area (17.3) are; HTL for 2025 and 2055 and MR in 2105.

The AA has identified that an adverse effect upon the integrity of the Deben Estuary Ramsar and SPA, may be caused by the HTL approach in the first two epochs. It also refers to the need to consider the outcomes of the Deben Estuary Strategy, the RSPB's position is that any inter-tidal habitat loss should be compensated for in epoch 1 and 2 in advance of any loss of habitat. The AA currently states that losses in epoch 1 and 2 may be addressed through re-alignment within the upper and middles estuary during epoch 3, such incompatibility of timing would constitute an adverse effect.

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#### **From English Heritage**

Dear Mr Oakes,

Thank you for consulting English Heritage regarding the draft revised Suffolk Shoreline Management Plan (SMP2), dated July 2009.

English Heritage is the Government's principal adviser on all aspects of the historic environment, including historic buildings and areas, archaeology and the historic landscape, with responsibilities that extend to both the urban, rural and marine environments. Alongside our statutory duty to conserve the heritage, we are also required to advance its understanding and enjoyment by the public. As part of this function we manage an estate of over 400 historic properties open to visitors. English Heritage is sponsored by the Department for Culture Media and Sport, but our corporate objectives are now set jointly by DCMS, Communities and Local Government and the Department for Environment Food and Rural Affairs.

English Heritage has been involved in discussions with the consultants during writing of the SMP2 and we are grateful that a number of the points raised have been taken on board in the consultation draft. The policy decisions that entail the preservation of Martello Towers at Slaughden and Shingle Street are to be lauded, Section 3.1.4 is particularly well worded and, whilst containing a number of inconsistencies, there is good detail in Appendix E3.

Despite our earlier engagement in the process, we feel that the draft continues to fundamentally undervalue many key aspects of the historic environment, including its cultural, social and economic contribution to the Suffolk coast. It appears that the special characteristics of the historic environment have not been fully understood, leading to an unsatisfactory and flawed treatment of the rich variety of historic assets within the subject area. Most fundamentally, we feel that not enough importance has been placed on the finite and non-renewable nature of physical historic assets and the wider landscapes in which they sit. The treatment of landscapes as an aspect of the historic environment we feel is particularly weak in this document.

Furthermore, the plan fails to adequately highlight the likely high mitigation costs entailed by a number of the preferred policies. The poor economic assessment of historic assets is most evident in Appendix H which seriously undervalues or omits the monetary value of such sites, despite some costs being previously established following SMP1.

As a result of these failings, we do not consider that the historic environment issues have been adequately addressed, and we shall expect to see significant revisions before English Heritage is able to support the final SMP2 document. We suggest that a historic environment specialist would be best-placed to make these corrections. Please find some detailed comments appended to this letter, but please be advised that we feel the historic environment aspects of the plan need to be fundamentally readdressed in order for English Heritage to be able to give their support to the document.

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I hope you find these comments helpful. I would be pleased to discuss them in more detail, if this would be of assistance.

Yours sincerely,

John Ette

Inspector of Ancient Monuments  
Team Leader Suffolk and Bedfordshire

Our detailed comments are as follows:

#### **Glossary of Terms, p.ii**

We would like to see 'heritage assets', 'historic environment' and 'mitigation' added, as these phrases capture key aspects of the SMP2; we would also like to see increased use of these phrases in the document, where appropriate.

Possible definitions are:

**Heritage Assets** "A building, monument, site or landscape of historic, archaeological, architectural or artistic interest whether designated or not. Designated assets may be World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park or Gardens, Registered Battlefields and Conservation Areas."

**Historic Environment** "All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed flora."

**Mitigation** "Practical measures taken to offset the impact of a policy upon physical assets. For the historic environment, this may be 'preservation by investigation' for archaeological features, or 'preservation by recording' followed by staged abandonment, demolition or re-location for listed buildings. There is no effective mitigation for the loss of historic landscapes."

#### **Key principles, Section 1.1.3**

To bring the statement in line with English Heritage policy, we would appreciate its rephrasing to state "To support the historic environment and cultural heritage where economically, technically and environmentally sustainable"

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#### **Natural and Cultural Heritage, Section 3.1.3**

This subsection is at present inadequate, and we would like to see significant revisions – most notably, much clearer reference to the inter-relatedness of geology, heritage, and natural features along the coastline.

*Geology* It should be noted that a number of key geologic sequences along the Suffolk coastline are also significant for their associated Palaeolithic remains.

*Heritage* This statement is at present extremely weak and does not reflect English Heritage's position on the importance of protecting heritages assets where at all sustainable. There is no listing of nationally designated heritage assets (for example, scheduled monuments and grade I, II\* and II listed buildings along the coast), unlike Table 3.1 for the natural environment.

p.3.12 "Roman Saxon town" does not make sense and ask if the word 'and' needs to be inserted?

p.3.12 "sites or monuments" should be changed to 'designated heritage assets'.

p.3.12 The final paragraph is also extremely weak, since it fails to note that the historic environment is irreplaceable – or that designated heritage assets should be protected wherever this is sustainable. Both these points are key aspects of English Heritage's stance. In addition, we would like reference to be made to 'mitigation', rather than surveying and recording.

p.3.12 "the opportunity to sustain the historic environmental values in an appropriate manner" is a meaningless phrase. We would like greater clarity on this issue.

*Landscape* English Heritage feels strongly that consideration is given in this section to historic landscapes, for example the lengths of Heritage Coast covered by the SMP2. Also consideration should be given to the collective importance of historic patterns of settlement and land use, and their relationship to natural environment designations (notably, freshwater grazing marsh). We would like reference to be made to these aspects of the landscape. The final paragraph on p.3.14 hints at this, but the relationship between landscape value, both urban and rural, and historic environment should be stated more clearly, perhaps by referring to historic landscape characterisation.

#### **Human (Socio-Economic) Environment and Activity, Section 3.1.4**

p.3.15 "...heritage sites" ought to read "heritage assets"

English Heritage feels that it would be beneficial to mention the numerous clusters of listed buildings within coastal settlements, and the role of conservation areas in protecting larger areas of most commonly the historic built environment.

#### **Natural Environment, Section 3.2.3**

This subsection deals with sustainability issues directly affecting the natural environment. There is no equivalent subsection for the historic environment, which is also critical within the SMP2 as it is an irreplaceable asset. A separate subsection at

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this stage would allow brief examination of the threats that the historic environment is subject to and how these may be mitigated (for example, whether by sea defence or loss preceded by survey, recording, demolition or rebuilding elsewhere). It would also be a good opportunity to highlight the often substantial costs entailed by mitigation and that, whilst specific features may be addressed, there is no effective mitigation for historic landscapes.

#### **Benacre Ness to Easton Broad, Section 4.2**

We would like to question why the historic environment has not been included within the stakeholder objectives. The historic qualities of the landscape have been recognised in the preceding 'Heritage and Amenity' overview, and therefore feel strongly that the historic environment should form one of the stakeholder objectives for this section. We feel this is symptomatic of the overall failing to see the historic environment as a key element of the plan.

p.PDZ2:13 The Economic Assessment table provides no indication for loss of historic assets, for which costs extend from mitigation of those assets to loss of tourist and amenity value. The likely cost of mitigation for Covehithe will be extremely high, and it is misleading to omit this from the table. This comment may be extended to the other PDZ sections.

p.PDZ2:14 The General Assessment of Objectives makes no mention to loss of historic assets, as a result of its omission from the stakeholder objectives for this PDZ.

#### **Easton Broad to Dunwich Cliffs, Section 4.3**

p.PDZ3:6 "Greyfriars Monastery" ought to read "Greyfriars Priory" and it is the "Hospital of **the Holy Trinity**"

#### **Plan for balanced sustainability, Section 5.1**

The paragraph regarding Covehithe (p.5.7), whilst acknowledging the historic importance of the village, states that "it is not considered sustainable or desirable to attempt to manage the erosion". Whilst erosion may be inevitable, the lack of any management of its advance would put great pressure on achieving sufficient mitigation, which would need to be extensive.

#### **Predicted implications of the preferred plan, Section 5.2**

There is not sufficient weight attached to the impact upon the historic environment, nor the likely cost of mitigation for some very significant historic assets.

#### **Implications for landscape, Section 5.2.3**

This subsection is vague, and landscape needs to be considered with the historic environment as an integrated whole.

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#### **Implications for historic environment, Section 5.2.4**

At present, this one paragraph is completely inadequate and cannot be supported by English Heritage. A number of proposed policies in the SMP2 will have a significant impact upon historic assets, either through loss or indirectly through substantial changes in their setting. Historic assets are a finite and non-renewable resource. We would like to see complete rewriting, in particular a stronger emphasis upon the irreplaceable nature of historic assets and that they will be protected wherever it is sustainable.

#### **Funding, Section 5.3.2**

There is no discussion of the sizeable costs that will be entailed by mitigating the loss of numerous historic assets; most notably the villages of Covehithe and Dunwich, and Scheduled Monuments of Leiston Abbey and The Hospital of the Holy Trinity. Reference should be made to the continuing lack of agreement as to who is financially responsible for the indirect effects of policies that lead to coastal erosion. Whilst the SMP2 cannot be expected to resolve these serious issues, they should be clearly flagged.

#### **Appendix D, Natural and Built Environment Baselines**

##### **Human and built environment characteristics, Section 6**

This section would benefit from tabulated listings of the statutory designated historic assets found within each geographic subsection (e.g. Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens).

#### **Appendix E, Issues and Objectives Evaluation**

##### **E1 Introduction**

“...between the River Tyne and Flamborough Head,”; this requires correction.

##### **E3 Issues and Objectives Table**

All Listed Buildings across all three tiers of significance are recognised by the Secretary of State to be of national significance. This should be indicated clearly in the table.

“Heritage sites” should be rephrased as ‘heritage assets’.

Entries 244, 378, 9, 445 and 480 have inconsistency between Grade II\* in the ‘Issues’ column, and Grade II in the ‘Benefits’ column.

Entry 488 should be indicated as being of national significance, as it is a Scheduled Monument.

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#### **Appendix F, Strategic Environmental Assessment**

##### **The Historic Environment, Section 3.3**

There ought to be reference that, whilst designated historic assets provide an indication of the significance of historic environment along the coastline, many important archaeological features are not designated in the inter-tidal zone due to the dynamic setting. Similarly there is likely to be unknown and therefore undesignated archaeological sites in the area. The data in the SEA thus provides a guide, but is not comprehensive.

We welcome the reference to the scheduled monuments within the study area (p.20) and would like this to be extended to include historic assets that are protected by the other statutory designations.

##### **Environmental Issues, Section 4.1**

Reference to the "...North Norfolk coast." requires correcting.

##### **Issue – maintenance of the archaeological and historical features of the Suffolk coast, Section 5.4.5**

Whilst the losses of the Hospital of the Holy Trinity and Leiston Abbey are mentioned, there is no discussion of the village of Covehithe. All these losses are of great concern to English Heritage, since mitigation is never as good as preservation.

##### **Investigation of coastal cultural and archaeological sites, Section 6.1.5**

Like Section 5.4.5, this section also over-relies on reference to Scheduled Monuments when identifying likely major losses. We feel it is essential that the loss of Covehithe, and numerous significant but undesignated historic assets (notably, inter-tidal archaeology) is also flagged. It is, however, appreciated that the issue of funding has been raised in this part of the report.

##### **SEA Assessment Tables, Appendix I**

Table A2.6 The gradual/natural approach to realignment should, at best, be regarded as having a neutral impact upon the historic environment – due to provision of adequate time for mitigation. The presence of time does not convert the loss of historic assets into a positive or minor positive, as losses to the historic environment can never be fully overcome by mitigation. Indeed it states in the draft PPS15 in Policy HE13.1 that a documentary record is not as valuable as retaining the asset.

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From Robert Flatman, Anglia Water

***In answer to a question: Does Anglian Water have any comments on the draft proposals for managing the coast south of Kessingland as stated in policies BEN 6.1, 6.2 and 6.3 shown on pages PDZ2:26 and PDZ2:27 in the draft SMP?"***

With reference to your e-mail which has been passed to me for comment.

The proposals as detailed, do, as you state not immediately effect the Sewage Treatment Works (STW) but do risk flooding to some of the sewers and a pumping station that transfers flows to the STW. If the flooding were likely to happen infrequently and for short durations then Anglian Water (AW) would have no specific comments as we would deal with the flooding as part of our normal operations, as we currently do with flooding situations. We would probably look to isolate the flooded sections from the rest of the network, so as to prevent saline inundation of the STW, and use Road Tankers to maintain a service as required.

In the long term if the flooding were to be more frequent and longer lasting then AW would consider undertaking alteration works to secure the operation of our assets. This could include moving the pumping station to outside the flooded area or raising it above the flood level and the sealing of manhole and access covers to prevent water entering the network. To this end it would be useful to be kept informed of proposals. Also if you have any additional information (to that shown on page PDZ2:6) as to the predicted flood level, frequency, duration and the point in the future that this is likely to occur this would be useful as it would enable AW to better plan for any alteration work.

I hope this is sufficient for your needs but if you requires any further information please let me know.



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**From Kessingland Parish Council**

#### **SHORELINE MANAGEMENT PLAN REVIEW - CONSULTATION**

The Parish Council is of the view that

- 1) The total non co-operation stance Anglian Water in refusing to get involved is plainly completely unacceptable. There is an enhanced threat here to the drainage and sewerage here that needs significant forward planning. Burying one's head in the sand is not an option. A way needs to be found to oblige Anglian Water to come to the table and establish how they will respond to their commitments and obligations both for now and in the foreseeable future. The extended development on the Pontin's site will further exacerbate an already unsatisfactory situation, and further add to the calamitous situation we already have to live with.
- 2) We note that these policies are to be incorporated in the L.D.F. (Local Development Framework) for consultation regarding planning development. What will this mean? Whose targets will have priority? It is also noted that Kessingland is a principle feature in the overview of Policy Development Zone 1, for Built Environment, Heritage and Amenity, and Nature Conservation, and a managed realignment policy, or more honestly, a "do nothing" policy, will put all these elements in grave danger and render many hectares of Kessingland and the surrounding area uninhabitable for man or beast.
- 3) With regard to funding – there appears to be none. Potentially and practically there is now no land in Kessingland for future development, so no potential income from Section 106 monies or any other obvious sources. However, we are fully aware that Government, District and County Councils are always readily taking money from residents and businesses by way of direct and indirect taxation, so it is quite reasonable to expect these bodies to support our Communities in their hour of need. Money always seems to be made available to support other countries in their hour of need when suffering from some natural calamity, so it is quite appropriate that Kessingland *et al* should be supported when we are likely to suffer in a similar situation.

We consider that Kessingland is the most vulnerable habituated point on the east coast; we accept that we need both protecting and guidance that will go beyond organisations and bodies shrugging their corporate shoulders and saying "it's not our problem. You will have to sort it out for yourselves." How?

Please ensure commitment to be more actively involved with the Parish Council in future discussion.

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**From Rob Wise, Country Land and Business Association**

#### **Response to the Consultation on the Draft Suffolk SMP - Subcell 3c**

The CLA is the leading national organisation which represents and supports businesses in rural communities, covering all aspects of land use and management. We represent the breadth of the rural economy with 36,000 members in England and Wales. Together they own around 5 million hectares of rural land. Our members run many different types of businesses in rural areas including agriculture, forestry, fisheries, renewable energy, food, tourism, recreation and other rural businesses.

We set out our general comments on this draft SMP having consulted within our local membership some of whom will respond individually with specific local comments.

In our response to the initial consultation on this SMP in 2007 we said we believed that the fundamental approach underlying Shoreline Management Plans was flawed. We believe SMPs are intended to be a means of managing dynamic physical processes and guiding future decision making on the basis of community decisions about the value of various assets. However it appears to have become an exercise in the application of forcing policy to fit current funding conditions. This appears to be even more true today than it was two years ago.

Once a coastline is lost it is unlikely ever to be recovered and at the pace that sea level is rising practical defensive action taken now may be capable of protecting coastal land for up to 100 years to come. Cost benefit calculations that determine that Government should put off the task of securing the coastline until the last minute are inefficient and short-sighted. Once our defences have been neglected over a long period of time they will inevitably become much more costly to repair/replace – reducing the options available. The attitude should be ‘a stitch in time save nine’. However the effect of the current funding appraisal is to do the opposite, by undervaluing the long-term benefits in relation to the upfront costs.

Shoreline Management Plans cannot be credible in rural areas while the cost benefit analysis techniques used to develop the policy options undervalue heritage, commercial, infrastructure and community assets, and while the test discount rate declines so slowly that necessary long-term investment is made to appear uneconomic. We do, however, believe that private finance can be part of the equation. If local businesses and communities sufficiently value their assets they may be willing to find ways to ‘top up’ the public purse. We are encouraged by the progress that has been made in this regard with schemes at Bawdsey and what is planned to occur on the Blyth.

The CLA is conscious of long-term sea-level rise due to climate change which, on the east coast, compounds isostatic adjustment. However, there is a range of potential levels, and rates of sea-level rise, reflecting the range of possible future emissions scenarios and the lesson here is to develop flexible policies. If sea levels rise or erosion occurs faster than predicted a long-term reassessment may be necessary,

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but this will occur over a period of many decades - generally beyond the life of any sea defence structures.

It is impossible to view the SMP in isolation without consideration of what is proposed within the Suffolk estuarine plans, spatial and other plans. The protection of coastal communities and agricultural land should be seen as key objectives, given equal priority to the protection of designated environmental sites. A sustainable future for the coastline requires economic and social/community assets to be given equal importance as environmental assets – something that is difficult to achieve in practice as much of the environment has legislative protection.

We repeat many of the points we made in the 2007 consultation, that in the CLA's view the SMP should seek to value and do all it can to protect the following coastal assets:-

- **Households.** If in the long term loss of houses through erosion is unavoidable, homeowners should get proper help for relocation. We are encouraged by Defra's recent pathfinder consultation that this point is now being recognised. However the future budget for this will likely need to be significantly greater than the sums on offer under this initial consultation. In considering houses at risk, there should be emphasis on protecting vulnerable people (the infirm who are at risk of losing lives in the event of serious flooding) and listed buildings.
- **Agricultural land** The government undervalues agricultural land in its appraisal of flood and coastal risk management. Food and grown fuel production in the UK will be vitally important both to the UK economy and in the worldwide fight against climate change. The SMP should seek to protect this land and therefore the policies should universally favour hold the line. In addition, coastal grazing marshes provide both sustainable meat production and valuable biodiversity benefits, which cannot easily be relocated further inland, without massive investment – far greater than the cost of defending the land using soft engineering techniques.
- **Freshwater supplies** The Environment Agency recognise the Suffolk coastal area as being 'seriously water stressed' (*Water for People and Environments 2007*) with pressure from population growth/development, increasing demand and lack of available water. The local agricultural economy is heavily dependant on good supplies of fresh water and the SMP needs to ensure local water sources are kept free from sea-water contamination. For climatic reasons it is impossible to relocate the high-value irrigated vegetable crops from the coastal region to other inland UK areas. Thus if the supply of irrigation water is reduced through sea-water contamination, food-miles/carbon footprint will be increased and the local economy will suffer. Again this favours a universal hold the line approach.
- **Tourism** The value of tourism and recreation to both the economy of the Suffolk coastal area and the well-being of local residents cannot be underestimated. The SMP should ensure that our excellent Suffolk beaches

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are not degraded and areas of public recreation and access are protected – or re-located inland if no alternative is available. Our historic buildings/sites form an integral part of the tourist economy and are highly valued by the local community – far beyond their monetary value. They should be protected as they can never be recreated once lost.

- **Natural Environments** Much of the local natural environment is designated as SSSI, SAC, etc and are, therefore, given legal protection. However recent decision making in relation to the Blyth estuary strategy suggests that this legal protection is open to interpretation. We need greater clarity in when the statutory authorities are entitled to walk away from protected sites versus being required to protect and maintain them.
- There is a growing feeling that the SMPs are being used to promote habitat recreation programmes without firm science or openness in the calculations behind habitat creation targets. If communities are to have confidence in the process of deciding between hold the line and managed realignment, greater transparency is needed in explaining how habitat recreation targets are calculated and then applied at a Subcell level.

The CLA's general presumption is that landowners should have the option to hold the line on their defences. In a time of budget constraints on the public purse we recognise that public funding may not be possible for this and therefore we recognise that landowners may need to cost share in this approach. The practical examples of where this has already occurred suggest that this is a valid approach for the entire Suffolk coast.

The logical conclusion of this is that we would seek to see the SMP favour a 'hold the line' policy prescription over the 'no active intervention' approach wherever the SMP is identifying interim policies that are dependant on the outcome of the development of estuary strategies.

The CLA has long advocated that the SMP and estuary strategy consultation process should be aligned. In the absence of this we believe the most precautionary approach should be taken in the SMP pending the outcome of the development of estuary management and investment plans. This is particularly pertinent for the Alde and Ore.

Our overall assessment of the proposed policies in this SMP is that they move faster in the direction of managed realignment than the existing evidence base for sea level rise justifies. Therefore we favour a more cautious approach. Managed realignment for the purposes of habitat creation should for the foreseeable future be market driven rather than coastal defences policy driven. Sites are coming forward and will continue to do so at a rate that is likely to keep pace with the real need to meet legislative habitats recreation targets.

In considering the appropriate assessment conducted for the SMP we are concerned about the methodology for assessing saltmarsh loss and the need for habitat

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recreation. This is a concern that the CLA has for the whole of East Anglia and not just for Suffolk.

While coastal squeeze does exist we are unconvinced that it is as significant as the government agencies contend - at least at the moment. There is much anecdotal evidence of saltmarsh gain in areas that have been designated as losing saltmarsh. Additionally the accuracy of the data sources used to calculate saltmarsh loss in the last fifty years is questionable. We therefore question the figures government agencies are working with to establish habitat recreation targets. This is creating an overemphasis in the SMP for managed realignment.

In considering the economic appraisal conducted for the SMP, we are heartened that, following guidelines these are to be taken as guideline values. More detailed appraisal would need to be conducted before any major change in policy was implemented. This will allow for the ever increasing amount of data on owner repair costs to be taken into account. Once these generally lower costs are taken into account the cost benefit analysis will shift in favour of hold the line policies.

It is interesting to note that the increasing evidence base and practical experience coming from owner repairs and maintenance works is helping the Environment Agency improve the cost basis of their own repair works.

Thank you for the opportunity to comment on the draft SMP and we look forward to with interested parties as the process of finalisation and implementation moves forward.

GENERAL						Response						
Res.Ref	Accept SMP	PDZ	Organisation	Correspondence	Issues Raised	Clarify	Info.	Policy	Comment	Action Suggest	Comment/ Action in finalising SMP	Page No.
INDIVIDUALS												
i5	N	1,2,3,4,5		Norman Castleton			•		In general I find these proposals disturbing, defeatist and negative e.g. in no instance is there a proposal to advance the line. I think the general policy should at least be to hold-the-line. I also disagree with the wishful thinking associated with Managed Retreat. For example, No Active Intervention or Managed Retreat at Easton Bavants, the Blyth Estuary, Dunwich, Minsmere will make the area surrounding Southwold and Sizewell (including the nuclear power stations) not viable. Transport links, a unique coastline and the recreational activities will be compromised and destroyed. In summary I think the Precautionary Principle should be adopted pending developments in environmental sciences and the fight against the affects of man-made global warming. We should be positive and not defeatist.		Views noted but the SMP has to be based on a realistic assessment of risks and management of risks. The policies take these into account.	
i19	Y			Mr K Allen			•		Coastal Chart's tidal flows offshore dredging and changes of tidal flows. Any changes off shore line will have effects. Also coast charts should read maritime charts. Not enough protection off coasts. Time line is too long, work should start now. Floods of 1953 should have taught a lesson.		Noted	
i20	Y	1		Janey Blachflower			•		This is an exceptionally varied and beautiful stretch of coastline which is subject to constant change through the various processes examined in the appendices to the SMP. I would like to make three points: 1. This sub cell should be managed as a whole entity because of the interaction between the various PDZs (e.g. erosion/deposition) 2. Minimum intervention should be a guiding principle - it would be easy to spoil the coastline by over-zealous intervention which would not be financially sustainable. 3. It is important to manage it as a 'living' entity safeguarding wildlife and human interests.		Points noted. We do intend to manage the coastline as a whole, hence the production of this SMP.	
i22	Y			Matthew Robertson			•		I know this is a high-level plan, but at some point we need to know what exactly 'management realignment' means in particular places.		Noted. Addressed in Action Plan.	
i23	Y			Lynda Robertson					Agreed with policy.		Noted.	
i24	Y	7		Rev R Moore			•		I would like to have the original geo-physical survey reports of 'Posford' in the 1980s, who rebuilt our cliff i.e. bore-hole analysis for hidden aquifers behind the cliff face. Slip-circle survey for stability coefficients.		Noted. We have looked for more detailed records. If further records are found, these will be passed to the consultees.	
i30	Y			D Persons					Agreed with policy.		Noted.	
i33	Y	1, 2, 3, 4, 5, 6, 7		D Harrod			•		I am a teacher at Leiston High School. We study in detail the local coastline from Key Stage 3 up to A level. Any further information about the planes and coastline with any available resources would be greatly appreciated!		All information is on the project website - <a href="http://www.suffolksmp2.org.uk/">http://www.suffolksmp2.org.uk/</a>	
i34	Y	4,5,6		Martin Higginson			•		Teacher at a local school. Any information about the SMP gratefully received.		All information is on the project website - <a href="http://www.suffolksmp2.org.uk/">http://www.suffolksmp2.org.uk/</a>	
i43	Y			Anon					Agreed with policy.		Noted.	
i44	Y	1, 2, 3, 4, 5, 6, 7		A J Francis			•		While I do not have a house perched on a cliff, I do feel that this matter of coastal protection is most important on this side of the UK and that although at the moment it does not seem economic to protect farming land we may get to the stage when any and will be at a premium.		Noted.	
i52	Y	1, 2, 3, 4, 5, 6, 7		Brian J Brackley			•		It appears a political fudge. Reference to maintaining current positions are hollow without assured funding. To try (to) save parts of the coastline alone will not be cost effective in the longer term and it is not being very honest.		The SMP is tasked with identifying a plan that delivers balanced sustainability. This recognises issues over funding.	
i54	Y			E W Stanford		•			Sub Cell 2C. There is confusion in the defined objectives. Some are not concerned with shoreline management. How do you propose to: to maintain biological and geological features. To support the adaption of local communities to maintain the core heritage values of the area (what are they?)		We will clarify the SMP position on this to explain that the objectives are those identified by stakeholders and how they relate to each other.	
GROUPS												

G1a	N		SCAR	Graham Henderson	No reason to move away from 'hold the line'	•			We do not accept there is any reason to abandon the current "Hold the Line" policy for the Suffolk coastline and we do not concur with several principles and proposals of SMP2 Sub-cell 3.		It is unclear as to what is meant by 'the current hold the line policy for Suffolk'. Under SMP 1 the largest extent of policy was Do Nothing. The SMP 2 sets out policy that in effect maintains protection to all the principal settlements. In other areas the SMP attempts to maintain the extremely important natural coast, while addressing agreed objectives defined by stakeholders where sustainable to do so.	
G1b	N		SCAR	Graham Henderson	lack of sensible co-ordination between coastline and estuarine strategies.		•		Suffolk's estuaries are so integrated into the coastline that a shoreline strategy should only be finalized in concurrence with strategies for all four estuaries -the Blyth, Alde/Ore, Deben and Orwel/Stour together with additional relevant locations, such as Minsmere sluice.		SMP has highlighted the importance of taking an integrated approach and where appropriate provides guidance for integration with emerging estuary initiatives. We will seek to clarify this in the Action Plan.	
G1i	N		SCAR	Graham Henderson	Time required to consider public funding		•		We consider that more time should be allowed for the generation of proposals for public/private funding		This is dependant on specific circumstances along the coast and would be reviewed. We will seek to clarify this position.	
G1j	N		SCAR	Graham Henderson	Clarification of food security policies required.	•			The Government and Defra should clarify how 'food security' policies dovetail with the fact that 60 per cent of Grade 1 agricultural land lies below the five metre contour line.		We are unaware of any Grade 1 agricultural land put at increased risk due to SMP policies. We will confirm.	
G2a	N		Suffolk Coast and Heaths	Nick Collinson	SMP needs to consider all assets not just economic based.	•			There needs to be a proper evaluation of ALL assets (not just economic ones), which there currently doesn't appear to be, whether this is undesignated wildlife habitat (Kessingland Levels), landscape or public access. We made no suggestion of preserving things in aspic, but simply to ensure decisions about change are made with full information to hand		As set out in SMP 2 guidance. The economic assessment is meant to be a check of the viability of the preferred plan. In areas, where economic factors are likely to be critical, this is explained in more detail. This level of detail would be included at a Strategy Level and not in the SMP.	
G2b	N		Suffolk Coast and Heaths	Nick Collinson	SMP needs to consider landscape value of the coast.	•			The biodiversity value of the coast is more than the sum of its parts. Numerous examples of species & people (tourists) that use the landscape rather than simply individual protected sites. The assets need to be considered at a landscape scale		Accepted and we will look to reinforce it in the SMP.	
G2c	N		Suffolk Coast and Heaths	Nick Collinson	The SMP does not consider coastal access	•			It isn't clear how Coastal Access is factored into the SMP. This needs to be clearer and we felt that there is probably enough information within the draft NE Coastal Access strategy to inform the SMP at this strategic policy level		Local access has been considered and discussed. Will be identified in the action plan.	
G2d	N		Suffolk Coast and Heaths	Nick Collinson	How can NAI policy give landowners opportunities to privately defend their land.	•			NAI policies on the coast make little sense if private investment and landowner action is to be allowed/encouraged. NAI policies effectively tie everyone's hands and prevents any schemes coming forward. If NAI is a flexible policy and allowing of private investment/action then NAI as a policy is meaningless		The SMP identifies areas that could be defended without having adverse affects on the coastal process, however would not be economically justified. Therefore privately funded defences would be acceptable. However there are other areas where private works would not be approved due to impact on other features of the coast. This has been highlighted.	
G2f	Y		Suffolk Coast and Heaths	Nick Collinson	A default HTL policy should be adopted for short term to allow for options to develop.		•		HTL should be used as the default 20 year epoch policy, wherever a sustainable or feasible option, to allow time for social and environmental adaptation. E.g. compensatory wildlife habitats take several years to find, buy and create.		Agreed.	
G2i	N		Suffolk Coast and Heaths	Nick Collinson	100 year timescale is too long a period to consider sensible management		•		100 year epoch- so many things will change over this timescale- our coastal processes knowledge, our opinions, our politics. 100 years is a meaningless timescale over which to have SMP policies, particularly given the PDZs are new for SMP2, and it is therefore difficult to cross reference management units from SMP1 to SMP2		The 100 year period is necessary to effectively manage the coast. We will seek to clarify the cross reference between SMP 1 units and SMP 2 units.	
G2j	N		Suffolk Coast and Heaths	Nick Collinson	SMP1 has not been reviewed appropriately	•			There seems little review of SMP1, particularly which policies worked well, which didn't and which needed to be done differently.		This is discussed under the With Present Management scenario and only where there were issues with previous policy, have there been policy changes. We will seek to clarify this position.	
G2k	N		Suffolk Coast and Heaths	Nick Collinson	AA is not detailed enough	•			General concern that the Appropriate Assessment is not detailed enough		AA has been carried out in accordance with guidance up to policy development stage, and has been agreed with EA and NE	
G2l	N		Suffolk Coast and Heaths	Nick Collinson	SEA does not cover issues in depth	•			Concern that SEA does not cover issues in enough depth, particularly landscape and access issues		Same as AA. SEA has been deemed appropriate for this plan.	
G2m	N		Suffolk Coast and Heaths	Nick Collinson	The impacts of NAI and MR on tourism and landscape need to be considered.	•			Part of the valuation of assets needs to be the value of the landscape to tourism. The total tourism value of the Suffolk Coast and Heaths AONB in 2006 was £166 million (East of England Tourism). The effect of some of the policies on this value of the landscape in economic terms is missing. i.e. Aldeburgh to Thorpeness Road and SMP NAI policy. Again not about preserving this popular tourist route in aspic, but being FULLY aware of the consequences of change, even if over longer term		As set out in SMP 2 guidance. The economic assessment is meant to be a check of the viability of the preferred plan. In areas, where economic factors are likely to be critical, this is explained in more detail. This level of detail would be included at a Strategy Level and not in the SMP.	

G2n	N		Suffolk Coast and Heaths	Nick Collinson	The SMP does not emphasise the value of landscape	•			Landscape is not just about natural habitats. Its is about the footprint of man over centuries and millennia and how that has shaped the habitats into what we see today. Its about the cultural aspects of the area and its sense of place. Landscape change is ongoing and again there is no aspiration to preserve it is aspic, it never has been thus. However just like with wildlife habitat change/loss, there is a need to fully understand the value and richness of what is being changed/lost.		In section 3 of the SMP it states in many ways this .landscape quality draws together the many aspects and activities associated with the coastline. The SMP highlights the context within which present human values exist. The SMP also highlights the changing nature of the coast. All these aspects have been taken into account in developing policy.	
G2o	N		Suffolk Coast and Heaths	Nick Collinson	Reference to Countryside Commission document would have help value landscape assets		•		Simple reference to the Countryside Commission document on Suffolk Coast and Heaths Landscape Assessment, would have helped enormously to better understand the landscape assets and the cultural importance of the SMP sub-cell		Noted	
G2q	N		Suffolk Coast and Heaths	Nick Collinson	Policies need to be consistent along the coast.			•	Policies need to be consistent. NAI and HTL are both considered beneficial for landscape at Easton Bavents and East Lane (Bawdsey) respectively. SMP can't have it both ways. Certainly concern that rock armour at east lane is considered beneficial for the landscape, in an area designated for its soft and dynamic coast.		These are totally different areas. In the case of East Lane it has been identified that the sequence of Martello Towers in the context of the landscape are a significant feature. This comment seems to conflict with earlier comment with respect to cultural aspects of the area.	
G3a	N		Alde and Ore Association	David Andren	Considers Defra Guidance to be flawed in terms of funding available for defence.		•		While welcoming the Department of the Environment, Food and Rural Affairs' (DEFRA's) agreement to look at policy options for periods shorter than 100 years, the Association considers DEFRA guidance on SMPs to be fatally flawed. This guidance assumes that only some £50 million a year will be available to fund coastal and tidal river defences for the whole of England, fails to recognise that failure of the coastal defences can frequently prove irreversible and does not consider the wider economic consequences of abandoning defences for our coastal community		The SMP has not been based on an "affordability" approach. The policies are those which will meet the stakeholder objectives in the most sustainable way. As set out in SMP 2 guidance, the economic assessment is meant to be a check of the viability of the preferred plan. In areas, where economic factors are likely to be critical, this is explained in more detail. We would agree that failure of defence can lead to irreversible consequences. However, in addition to the point being made with respect to loss of land, it is also essential that future generations are not committed to ever increasing expenditure on defence where there are appropriate alternatives which we can work towards in the present.	
G3b	N		Alde and Ore Association	David Andren	HTL policy should not be abandoned for the Suffolk Coast			•	The Association does not accept that is yet necessary to abandon the Hold the Line Policy for the Suffolk Coast and believes that Government funding of coastal and tidal river defences is totally inadequate. We also strongly support the views expressed by Councillor Andy Smith (SCDC) in evidence to the Parliamentary Select Committee (EFRASC) considering the present Government's proposed Flood and Water Management Bill. Like the Local Government Flood Forum we believe local councils and flood defences committees or boards should be given much greater discretion to formulate local flood defence policies and freedom to raise funds through local taxes and contributions such as the regional flood defence levy.		The policies are those which will meet the stakeholder objectives in the most sustainable way. The comments ref funding will be passed onto the EA , the Local Government Association and Defra.	
G3m			Alde and Ore Association	David Andren	SMP has not made reference to the innovative methods of defence on the Suffolk Coast.	•			The plan makes no reference to innovative developments in coastal management which could affect their efficacy and cost. For example, the National Trust are trialling resin based injections into the shingle along the spit near Lantern Marsh, new artificial shingle banks or mounds are being tested at Dunwich so far with positive results, and there are new approaches and old forgotten, but effective, ideas being resurrected on different heights and angles of groynes. All these could be highly relevant to the estuary. When compared with the cost of losing the economic value of the river they are likely to prove well worth considering and feasible within the first 25 year period.		Noted. The SMP has made reference to the demonstration project at Dunwich. Where appropriate alternative, innovative methods of providing defence are not prohibited.	
G3n			Alde and Ore Association	David Andren	Beach stabilisation techniques could be explored within the SMP.		•		We believe that along certain sections of the coast there is a case for examining the benefits of beach and shoreline stabilization plans. Along the coast we think this should be looked at in relation to measures which could help prevent erosion of the cliffs at Thorpeness and the area south of the Slaughden Martello Tower up to and including the Orford Ness lighthouse.		Noted. But this does not overcome issues that beach stabilisation has the potential to reduce drift and may therefore have a negative impact on adjacent areas of the coast. Such approach can be considered in scheme development.	



G3o	Y		Alde and Ore Association	David Andren	Believe that there is a greater need for public and privately funded schemes to develop.		•		In our 2008 position statement entitled "Framework for the Future", which was welcomed by Lord Chris Smith (chairman of the Environment Agency), we argued for public/private ventures to protect our coast and river defences. The SCAR response to the SMP also stresses the need, particularly in the light of initiative undertaken at East Lane (described in an article in our February 2009 newsletter available on our web site). During a wide ranging discussion with the Environment Agency in December 2008 we were promised a definitive statement on the scope for taking account of the availability of public and private finance from sources other than national Government. We received definitive DEFRA guidance on this subject on 11 September 2009. We will need to seek further clarification of the interpretation of this guidance as proposals develop during the course of the ACES and Alde and Ore Futures studies. Nevertheless, our preliminary assessment is that in the case of an economically prosperous area such as ours this new approach based on joint public/private finance offers considerable scope for		Noted. Where appropriate the SMP has encouraged this approach.	
G3q	N		Alde and Ore Association	David Andren	SMP does not make reference to facts or explanations behind decisions.	•			Finally, there are a number of points in the Report where points are asserted and not backed up either by facts or explanations. These include, in the Summary of Preferred Plan and Implications, paragraph 5.1 asserting that almost 100% of objectives are met in the first period but does not acknowledge the need for regular sound maintenance to avoid involuntary breaches. The same section then states that objectives are met assuming that these objectives are accepted. For example, the objective of supporting agriculture to adapt to changes is highly questionable as there may well be a case for ensuring as far as possible that aquifers are not allowed to become salinated.		Clarification required on this response. We will ask the Alde and Ore Association for instances where the report is not backed up either by facts or explanations so that the SMP may be clarified.	
G5	N		Suffolk Land Access Forum		SMP does not consider the effect on current access routes	•			Although the policies in the draft SMP will change see changes to the Suffolk coast over the next 100 years, it is noticeable that the effect of the plan on the current access for walkers, cyclists and horse riders through the rights of way network and particularly the Suffolk Coast Path is not considered. Neither are the likely effects on the local economy or agricultural land use.		Local access has been considered and discussed. Will be identified in the action plan.	
G7a	N		Shingle Street Settlement Company		Guidance does not take into account social and economic importance	•			SSSCo considers that the guidance DEFRA insists should be followed when drawing up Shoreline Management Plans should, but does not, take sufficient account of the social and economic importance of Britain's coast line and the possibility that any breach of our sea defences is likely to be irreversible.		The SMP concurs with the point being made with respect to loss of land in socio-economic terms, it is also essential that future generations are not committed to ever increasing expenditure on defence where there are appropriate alternatives which we can work towards in the present.	
G7b	N		Shingle Street Settlement Company		Do not see the need to move away from HTL.		•		The Suffolk Coast has historically receded and expanded, which has resulted in human intervention to defend it at many points and over long years. While recognising that the impact of Climate Change may result in sea-level rise, we are wholly unconvinced that there is yet any reason to abandon the current "Hold the Line" policy for the Suffolk coastline.		It is unclear as to what is meant by 'the current hold the line policy for Suffolk'. Under SMP 1 the largest extent of policy was Do Nothing. The SMP 2 sets out policy that in effect maintains protection to all the principal settlements. In other areas the SMP attempts to maintain the extremely important natural coast, while addressing agreed objectives defined by stakeholders where sustainable to do so.	
G7c	Y		Shingle Street Settlement Company		Public funding should be made available for coastal protection		•		Notwithstanding the successful raising of adequate private funds to undertake vital works at East Lane Point, we believe that in principle, national government funds should be deployed in sufficient quantity to protect the coastal lands and people of the United Kingdom. The coastline belongs to all citizens, can be and is visited by all citizens, and should not be abandoned for reasons of cost. While we note the Plan's emphasis on innovation in fund-raising, especially from private sources, we maintain our right to a fair share of taxation for Suffolk's coastal defence, and urge the Environment Agency to maintain its debate with government to this effect.		Noted. The comments ref funding will be passed onto the EA , the Local Government Association and Defra.	
G7f	Y		Shingle Street Settlement Company		Would welcome discussion on compensation for losses made in medium term.		•		We would like to see some discussion of compensation for those likely to suffer from unchecked immediate, medium term or long term coastal erosion		The comments ref compensation will be passed onto the EA , the Local Government Association and Defra.	
G8d	Y		Bawdsey PC	Louise Lennard	Regular reviews should be incorporated into the plan		•		The Council thinks that there should be a commitment to review the policy following publication and agreement of the estuary study, and to on-going reviews say every two years during epoch 1. A proposed timetable should be set out in the SMP		This will be included in the Action Plan.	

G8i	Y		Bawdsey PC	Louise Lennard	More financial support from public purse is required.		•	In Section 3.2.2 Economic Sustainability – the document effectively states that the Country just cannot afford to protect coastal people. Coastal communities do not agree with this view, when they see billions spent on say defending the Falkland Islands or invading Iraq. The reality is that Government currently chooses not to protect coastal people, even though in reality they are not asking for miles of sea walls but for just a few key points to be protected. In the next section – 3.2.4 Social Justice – it hints at the unfairness in this position but states that Government powers to build sea defences are merely permissive and therefore they have no responsibility to protect coastal communities. This is clearly not social justice. If a government decides to build a motorway and you lose your house, you are compensated. If a government decides not to maintain an existing sea wall and you lose your home, you are (currently!) not compensated. The SMP as a major document about the Coast and its Communities should more clearly state the lack of natural justice in this current anomaly.		While this point is noted, it is not implied that the country cannot afford to protect coastal people. The policies are not based on a "what can we afford" approach, they are based on what is sustainable. Other points which lie outside the remit of the SMP will be passed onto the EA, Defra and the Local Government Association.	
G9a	Y		CLA	Rob Wise			•	In our response to the initial consultation on this SMP in 2007 we said we believed that the fundamental approach underlying Shoreline Management Plans was flawed. We believe SMPs are intended to be a means of managing dynamic physical processes and guiding future decision making on the basis of community decisions about the value of various assets. However it appears to have become an exercise in the application of forcing policy to fit current funding conditions. This appears to be even more true today than it was two years ago.		The fundamental principle of the SMP is to advise on and develop a sustainable plan for the coast. Policy is then defined to deliver that plan. The approach taken, including policies where funding is uncertain reflects the emphasis placed by the SMP on meeting locally derived objectives for management. These take into account consideration of interaction with the hinterland. It is essential that policy put forward by the SMP should be realistic. Where we feel that through collaborative funding the community aspirations can be met without damaging impact on adjacent sections of the coast, then the SMP policy reflects this.	
G9b	Y		CLA	Rob Wise			•	Once a coastline is lost it is unlikely ever to be recovered and at the pace that sea level is rising practical defensive action taken now may be capable of protecting coastal land for up to 100 years to come. Cost benefit calculations that determine that Government should put off the task of securing the coastline until the last minute are inefficient and short-sighted. Once our defences have been neglected over a long period of time they will inevitably become much more costly to repair/replace – reducing the options available. The attitude should be 'a stitch in time save nine'. However the effect of the current funding appraisal is to do the opposite, by undervaluing the long-term benefits in relation to the upfront costs.		The SMP acknowledges the initial point made. However, in addition to the point being made with respect to loss of land, it is also essential that future generations are not committed to ever increasing expenditure on defence where there are appropriate alternatives which we can work towards in the present.	
G9c	Y		CLA	Rob Wise			•	Shoreline Management Plans cannot be credible in rural areas while the cost benefit analysis techniques used to develop the policy options undervalue heritage, commercial, infrastructure and community assets, and while the test discount rate declines so slowly that necessary long-term investment is made to appear uneconomic. We do, however, believe that private finance can be part of the equation. If local businesses and communities sufficiently value their assets they may be willing to find ways to 'top up' the public purse. We are encouraged by the progress that has been made in this regard with schemes at Bawdsey and what is planned to occur on the Blyth.		As set out in the SMP2 guidance, the economic assessment is carried out as a check on the viability of the preferred plan. In areas where economic factors are likely to be critical this is explored in more detail. As such the response on undervaluing assets and discount rates is not strictly relevant to the SMP process. In several areas the SMP is actively promoting the use of collaborative funding, as suggested by the response.	
G9d	Y		CLA	Rob Wise			•	The CLA is conscious of long-term sea-level rise due to climate change which, on the east coast, compounds isostatic adjustment. However, there is a range of potential levels, and rates of sea-level rise, reflecting the range of possible future emissions scenarios and the lesson here is to develop flexible policies. If sea levels rise or erosion occurs faster than predicted a long-term reassessment may be necessary, but this will occur over a period of many decades - generally beyond the life of any sea defence structures.		This uncertainty has been taken into account in developing policy for the SMP.	
G9e			CLA	Rob Wise			•	It is impossible to view the SMP in isolation without consideration of what is proposed within the Suffolk estuarine plans, spatial and other plans. The protection of coastal communities and agricultural land should be seen as key objectives, given equal priority to the protection of designated environmental sites. A sustainable future for the coastline requires economic and social/community assets to be given equal importance as environmental assets – something that is difficult to achieve in practice as much of the environment has legislative protection		Fully agree. SMP is not a statutory document, it is recommended that the planning process takes full regard of the SMP. The interaction between SMP and ICZM initiative is recorded and discussed in the SMP. It is however essential that the SMP gives clear statements from a coastal management perspective as to the consequence of different management scenarios and where appropriate defines sustainable policy.	

G9f			CLA	Rob Wise	The SMP should seek to value and do all it can to protect the following coastal assets:		•		<b>Households.</b> If in the long term loss of houses through erosion is unavoidable, homeowners should get proper help for relocation. We are encouraged by Defra's recent pathfinder consultation that this point is now being recognised. However the future budget for this will likely need to be significantly greater than the sums on offer under this initial consultation. In considering houses at risk, there should be emphasis on protecting vulnerable people (the infirm who are at risk of losing lives in the event of serious flooding) and listed buildings		This is an objective set out in the plan but has to be tempered by the realism of funding and the potential impact intervening on the coast may have on other values and on the ability to maintain appropriate defence elsewhere.	
G9g			CLA	Rob Wise	The SMP should seek to value and do all it can to protect the following coastal assets:		•		<b>Agricultural land</b> The government undervalues agricultural land in its appraisal of flood and coastal risk management. Food and grown fuel production in the UK will be vitally important both to the UK economy and in the worldwide fight against climate change. The SMP should seek to protect this land and therefore the policies should universally favour hold the line. In addition, coastal grazing marshes provide both sustainable meat production and valuable biodiversity benefits, which cannot easily be relocated further inland, without massive investment – far greater than the cost of defending the land using soft engineering techniques.		This is an objective set out in the plan but has to be tempered by the realism of funding and the potential impact intervening on the coast may have on other values and on the ability to maintain appropriate defence elsewhere.	
G9h			CLA	Rob Wise	The SMP should seek to value and do all it can to protect the following coastal assets:		•		<b>Freshwater supplies</b> The Environment Agency recognise the Suffolk coastal area as being 'seriously water stressed' ( <i>Water for People and Environments 2007</i> ) with pressure from population growth/development, increasing demand and lack of available water. The local agricultural economy is heavily dependant on good supplies of fresh water and the SMP needs to ensure local water sources are kept free from sea-water contamination. For climatic reasons it is impossible to relocate the high-value irrigated vegetable crops from the coastal region to other inland UK areas. Thus if the supply of irrigation water is reduced through sea-water contamination, food-miles/carbon footprint will be increased and the local economy will suffer. Again this favours a universal hold the line approach.		This issue is identified in the SMP.	
G9i			CLA	Rob Wise	The SMP should seek to value and do all it can to protect the following coastal assets:		•		<b>Tourism</b> The value of tourism and recreation to both the economy of the Suffolk coastal area and the well-being of local residents cannot be underestimated. The SMP should ensure that our excellent Suffolk beaches are not degraded and areas of public recreation and access are protected – or re-located inland if no alternative is available. Our historic buildings/sites form an integral part of the tourist economy and are highly valued by the local community – far beyond their monetary value. They should be protected as they can never be recreated once lost		The SMP has taken a broad approach to this issue. If specific cases are identified then the conclusions of the SMP would be revisited.	
G9j			CLA	Rob Wise	The SMP should seek to value and do all it can to protect the following coastal assets:		•		<b>Natural Environments</b> Much of the local natural environment is designated as SSSI, SAC, etc and are, therefore, given legal protection. However recent decision making in relation to the Blyth estuary strategy suggests that this legal protection is open to interpretation. We need greater clarity in when the statutory authorities are entitled to walk away from protected sites versus being required to protect and maintain them. - There is a growing feeling that the SMPs are being used to promote habitat recreation programmes without firm science or openness in the calculations behind habitat creation targets. If communities are to have confidence in the process of deciding between hold the line and managed realignment, greater transparency is needed in explaining how habitat recreation targets are calculated and then applied at a Subcell level		The SMP has objectives to conserve important nature conservation interests. The SMP has been guided by the Suffolk Coastal Habitat Management Plan (CHaMP), information from various strategies and through associated processes of undertaking a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). All these documents are in the public domain.	
G9k			CLA	Rob Wise			•		The CLA's general presumption is that landowners should have the option to hold the line on their defences. In a time of budget constraints on the public purse we recognise that public funding may not be possible for this and therefore we recognise that landowners may need to cost share in this approach. The practical examples of where this has already occurred suggest that this is a valid approach for the entire Suffolk coast. The logical conclusion of this is that we would seek to see the SMP favour a 'hold the line' policy prescription over the 'no active intervention' approach wherever the SMP is identifying interim policies that are dependant on the outcome of the development of estuary strategies		The general principle is that private owners may defend their land where this does not have a detrimental impact on adjacent areas of coast or estuary.	
G9l			CLA	Rob Wise			•		The CLA has long advocated that the SMP and estuary strategy consultation process should be aligned. In the absence of this we believe the most precautionary approach should be taken in the SMP pending the outcome of the development of estuary management and investment plans. This is particularly pertinent for the Alde and Ore		SMP is not a statutory document, it is recommended that the planning process takes full regard of the SMP. The interaction between SMP and ICZM initiative is recorded and discussed in the SMP. It is however essential that the SMP gives clear statements from a coastal management perspective as to the consequence of different management scenarios and where appropriate defines sustainable policy.	

G9m			CLA	Rob Wise		•		Our overall assessment of the proposed policies in this SMP is that they move faster in the direction of managed realignment than the existing evidence base for sea level rise justifies. Therefore we favour a more cautious approach. Managed realignment for the purposes of habitat creation should for the foreseeable future be market driven rather than coastal defences policy driven. Sites are coming forward and will continue to do so at a rate that is likely to keep pace with the real need to meet legislative habitats recreation targets		SMP policy is not solely driven by sea level rise. This is just one factor that has to be taken into account in managing this dynamic environment.	
G9q			CLA	Rob Wise		•		It is interesting to note that the increasing evidence base and practical experience coming from owner repairs and maintenance works is helping the Environment Agency improve the cost basis of their own repair works.		Noted.	
AUTHORITIES											
A1a			QRG	Stuart Rowe, Steve Jenkinson	This section sets out statements to represent how four policy options which are different to those in the guidance. Make NAI description clearer. 6.2 Tables require further explanation.	•		This section sets out statements to represent the four policy options which are different to those in the guidance. No Active Intervention (NAI) and Hold the Line (HTL) also include "natural coastline". Further, it would be helpful for the NAI description to make clear that this policy may be selected for technical, economic or environmental reasons. Also 6.2 Tables have Hold the Line on Retreated Alignment (HR), Habitat Replacement (HBR) &, Limited Intervention (LI) from SMP1 – these have not been explained in section 1.1.4 [SR] The statement for HTL includes the phrase "level of protection". This could be mis-interpreted to mean physical level as opposed to standard, as used in the SMP guidance. [SJ]	Can the team explain these statements, including why the references to natural coastline are considered beneficial? Also consider adding an explanation of other policy terms used in this plan. [SR] Could the project team consider amending the HTL definition? [SJ]	Clarification was sought from the Client Steering Group which confirmed that it felt that this is a more appropriate description of the policy option for the Suffolk coastline.	1.1.4
A1b			QRG	Emma Fisher	Further explanation needed in Appendix	•		There is little reporting of the impacts of the various policy scenarios on the coastal processes themselves, and there does not appear to be a Policy Appraisal appendix. Without this documentation, the SMP is without a transparent and auditable decision making process, which is key to having a valid plan.	It would be helpful to the reader to see an audit trail of the decision process behind the final preferred policies, perhaps in simple tabulated format. Also, No Active Intervention - With Present Management (WPM) reporting is included with the PDZ reports. It might be useful to move these to Appendix C for completeness.	As noted the PDZ reports address these issues. Due to the complex interactive nature of the frontage tables in appendices add very little value. The idea of moving the PDZ discussion to the appendix seems to detract from an audit trail. However, additional maps of erosion line under the different scenarios will be included in Appendix C; and a policy appraisal table will be prepared.	
A1c			QRG	Jim Hutchinson, Emma Fisher	Ore/Alde & Deben estuaries to be included? Explanation between the open coast and any sensitivity analyses to be made clear.	•		The separate report prepared by sub consultants on the estuaries gives the conclusion that the main estuaries need to be included with an open coast assessment but I could not see this in the main text of the main reports. It would help if more could be laid out in the report to explain the links with the open coast and what sensitivity analyses have been carried out in coming to the conclusions at these boundaries. [JH]. Why are Ore / Alde & Deben estuaries not included when S5 makes it clear there are important policy implications? [EF]	Can the team please set out how the estuaries have been assessed with the open coast and what sensitivities have been carried out to show that the conclusions are robust? [JH]. Team to review appropriateness of SMP boundaries adopted. Please look into including explanatory text in the front end document, and in the summary policy table in Section 6. [EF]	The issue of how estuaries are included will be discussed within the CSG. This is a difficult issue raised by consultees. Additional explanation to be added on the approach to the treatment and assessment of estuaries.	
A1m			QRG	Steve Jenkinson	Explain the interaction between the CFMP and the SMP.	•		The statement about CFMP (Catchment Flood Management Plan) policy appears to be left hanging with no explanation of its interaction with the SMP.	Could the project team provide some context for the CFMP policies where they are quoted like this, explaining the interaction with the SMP, or if this is included elsewhere in the report, to provide a link.	The CFMP statements are adapted directly from the CFMP documents. As such they are considered a clear statement of CF policy and these have been used in conjunction with SMP policy development. They are evidently compatible and we did not feel that they required further discussion.	4.1.2
A1t			QRG	Jim Hutchinson	Need clarity of any losses over the lifetime.	•		It was not clear where any losses over the lifetime of the plan is set out, e.g. property, businesses, agricultural land and other key environmental and heritage losses and when these may happen.	Can the team please set out what losses may result from a "no active intervention" case and clearly compare this with the preferred policy approach adopted in the plan?	Yes we can include this in section 5. This may assist in demonstrating that the SMP is not destroying the built fabric of the coast as implied by some consultees.	
A1v			QRG	Steve Jenkinson	Need to make stronger connections between spatial planning and the information being used. Section on how the SMP will link with statutory plans?	•		Strong links with spatial planning are important for an effective SMP. [SJ]  There is a lack of connections made between the information being provided and the way that information will be used on the ground by planners. Some way of identifying the implications of the info for local planning officers would be useful. [MB]  The basis for the development of the plan is well set out in Section 3. However, there are other issues that could usefully be explained here, such as a section on how SMP will link with statutory plans, e.g. RSS, LDF (Local Development Framework) and RBMPs (River Basin Management Plans) and other non statutory plans, including other local coastal plans, etc. [JH]	Could the project team comment on the level of integration with the spatial planning system, and whether any specific actions in this regard will be included in the Action Plan? [SJ] Could the project team please consider how this could be achieved? [MB] Can the team please explain what it plans to do on such issues? [JH]	Noted and will include in Action Plan	



A1au			QRG	Steve Jenkinson	Revisit economics and explain the decision making process where the costs of the preferred policy are close to the economic benefits.	•			<p>It is not clear to me how the outcome of the economic assessment influences the decision process regarding policy selection, from both benefit cost and funding aspects. The SMP should explain the decision-making where the economic costs of the preferred policy are close to or greater than the economic benefits.</p> <p>Also for example the reconciliation summary for Management Area. 09 comments briefly on the economic worth and likelihood of FCERM funding. Is the economic viability of the preferred options or the impact this may have on securing public funding discussed elsewhere? If FCERM funding is likely to be in doubt, is the SMP at risk of raising expectations if there is not a reasonable likelihood of other funding streams supporting the preferred option?</p> <p>(Note for team - the correct term that should be used in the plan is FCRM and not FCERM)</p>	Could the project team explain where these issues have been considered in the report please? And to set out the risks if no funding can be obtained and how this will impact on the plan?	As set out in the SMP2 guidance, the economic assessment is carried out as a check on the viability of the preferred plan. In areas where economic factors are likely to be critical this is explored in more detail. We will provide additional comment in Appendix H as suggested. (Note. FCERM is used as an abbreviation as defined in the glossary, it is not an acronym or a term. ) Some policies may not be fundable through FCERM budgets but this is well "caviated" in the text.	
A1av			QRG	Roger Morris	Thought to be given to geomorphological solutions, explain Cost-Benefit analysis of options.	•			<p>Previous studies on the Alde-Ore and Deben have shown that any work to the flood banks were considered largely uneconomic; so what has changed? My impression is that this SMP is developing a "hold the line" policy option for these estuaries that cannot be achieved using CBA (Cost Benefit Analysis). Thought needs to be given to geomorphological solutions, some of which may not be particularly palatable from a political viewpoint but they are when long-term economics is considered.</p>	Explain cost-benefit analysis in relation to these options and justify shift in policy option.	There is no published strategy for the Alde/Ore beyond that provided in 2000. The SMP is not therefore able to make any assumption with respect to this based on available information. Because of this and that even indicative updated results were not available, also given the new initiative for an ICZM approach, the SMP believes that it would be inappropriate to define policy for the flood banks within the estuary; beyond those strictly associated with the shoreline. It is wrong to suggest that the SMP has developed a HTL policy throughout the Alde/Ore. This is a point of contention reported by consultees arguing exactly the opposite position to that presented. Yes, uneconomic in FCERM terms but may be fundable in wider terms e.g. through the ICZM/ACES initiative. The SMP recognises this possibility.	
A1ay			QRG	Jim Hutchinson, Emma Fisher, Steve Jenkinson	State where other or better or more up to date data has been used. Optimism bias and property values have not been stated in this appendix.	•			<p>The report states that it has used MDSF tool throughout, and its not clear where other better, or more up-to-date data where available has been used. [JH] Modelling and Decision Support Framework (MDSF) has been used to determine the costs/benefits for the NAI and WPM scenarios (also shown in the PDZ statements), however, it does not appear that appropriate scenario testing has been undertaken with appropriate sensitivity assessments. [EF] This appendix usefully sets out some key data (eg rates for capital works) but I did not see typical property values or indeed the Optimism Bias value. Also the use of existing strategy/project data is not clearly assigned [SJ]</p>	Can the team please explain where other more up to date data has been used to supplement the MDSF tool and where there are close costs and benefits given, how the team has made its decisions on how best to manage the coast? [JH] MDSF should be run with preferred plan to assess the economic robustness of various options, not just HTL or NAI for the three epochs. Sensitivity testing and uncertainty analysis would add to this. [EF] Could the project team please consider more clarity with regard to data used in the plan? [SJ]	<p>i) This will be clarified in App H.</p> <p>ii) As identified in earlier response, economic assessment is to demonstrate viability of the preferred plan. Not as a primary tools for selection of scenarios. The sensitivity is discussed in the PDZ statements.</p> <p>iii) Optimism Bias is included in the costs as set out in header to table. We will clarify where strategy information is used in assessment.</p>	
A1ba			QRG	Steve Jenkinson, Roger Morris, Jim Hutchinson	The SMP appears to be setting a baseline for option development in the Deben Estuary and not providing strategic direction.	•			<p>Is it really economically viable to effectively "hold the line" throughout the Deben estuary in order to allow the mouth to continue to be pinned? Earlier work showed nearly all units not to be cost-effective, and his may be committing to a policy that is neither technically, economical nor environmentally sound. If private funding is required to achieve the SMP then the SMP has not been developed according to the economics and the geomorphological case. This seems to be a plan that is setting the baseline as accepting that the best option is to do what is sought locally rather than to set a strategic direction. This may lead to further problems in due course where communities find they cannot afford to maintain defences and look to public funds to meet aspirations. [RM]</p>		<p>(2) There is still significant scope for realignment in the estuary and for adaptive approach to where defences are held. Will clarify by adding an explanation on the approach to the treatment and assessment of estuaries. Furthermore, the SMP policy does not prevent estuary strategy proposing other policies. The Estuary Strategy can disagree with the SMP policy which says that there is a need to hold the estuary to manage coastline issues. The SMP is realistic in that it acknowledges that there are ways in which the upper part of the estuary can be managed to deliver/deal with the estuary issues. The SMP not imposing unrealistic policies on estuary strategy. The action plan will include developing a partnership approach to both management and funding in each of these areas.</p>	

A1bb			QRG	Steve Jenkinson, Roger Morris, Jim Hutchinson	More description could be given on funding sources for the long term.	•			Sect 3 could usefully explain how the SMP will be funded in the future given the numerous references to 3rd party funding throughout the report. For example PU 17.2 indicates HTL for all 3 epochs and suggests this decision is dependant upon private finance. Its not clear what the impacts might be with no future funding, within the 1st epoch, but more importantly in epoch 2 and 3. [JH]		(3) In addition to the above the issues with respect to third party funding will be reviewed within Section 3 and further clarification added as required. The action plan will include developing a partnership approach to both management and funding in each of these areas.	
A1bc			QRG	Jim Hutchinson, Steve Jenkinson	List all reports and data in the report which were used to come to the conclusions made.	•			Listings of all the data and reports used to come to the conclusions should be set out in the report. I am aware of Heritage risk assessments that have been prepared and it would offer the reader of this plan some comfort to know that the up-to-date information has been used to make the long-term decisions as set out. [JH]  The Regional Coastal Monitoring Programme managed by the EA provides valuable data. [SJ]	Can the team please explain the proposals for setting out the data/reports used in this SMP? [JH]  Could the project team explain how this data has been used within this Plan? Are appropriate references and links to the Regional Monitoring programme included? [SJ]	This information is held as a database and would be one of the outputs of the SMP. A hard copy summary can be provided as part of the document.	
A1bd			QRG	Jim Hutchinson	Highways are mentioned throughout the report.		•		Highways are mentioned throughout the report, especially the key A12 trunk route, and port authorities, etc.	Can the team please explain the capacity the key agencies, eg Highways, sewerage, ports authorities and so on have been engaged in the development of this plan and whether they are likely to sign up to the conclusions of this plan?	All relevant organisations have been engaged as stakeholders and actions will be defined to develop further discussion in key areas.	
A1be			QRG	Jim Hutchinson	Draft action plan to be presented with this consultation SMP report.	•			The draft Action Plan has not been presented with this consultation SMP report.	Can the team please explain the reason for this and when this report will be available for the SMP Quality Review Group (QRG) to review? Will there be a need for further additional consultation to allow stakeholders and the public view the full set of reports at the same time?	Policy Guidance does not require Action Plan to be published with draft SMP; it is defined as part of Stage 5. Action Plan will be presented to RMF and then Key Stakeholders for comment before inclusion in the SMP. Publishing AP at same time as draft SMP might have given impression that policies already fixed.	
A1bf			QRG	Steve Jenkinson	Draft WFD baseline report will be submitted at the next stage.		•		There is no draft Water Framework Directive (WFD) baseline report submitted with the plan at this stage, so the Quality Review Group (QRG) cannot review it. The SMP notes that this work would be undertaken following from the public consultation.	Could the project team please advise when the WFD assessment will be available to QRG for review? Also, how stakeholders and the public will be given the opportunity to comment on the WFD report – will there be a need for further additional consultation? Is there a presumption here that the WFD assessment will have no real bearing on the outputs of the SMP?	WFD work completed. Gone through internal review. Will be presented to CSG for comment. WFD requirements will not change SMP policy.	
A1bg			QRG	Roger Morris	PPS9 and supporting documents needs to be quoted as the Gov. policy on the protection of Ramsar sites originates from it.		•		The Govt. policy line on the protection of Ramsar sites originates from PPS9 and supporting documentation - this probably ought to be the source quoted as other guidance may be queried by those concerned about protection of sites.	Can the team please check and quote correct source as appropriate?	Noted.	Natural and built environment baseline 2.1. page 6
A2a	N		SCC	Guy McGregor/Jane Burch	SMP cannot be regarded in isolation		•		Suffolk County Council strongly believes that the SMP cannot be regarded in isolation and that an integrated approach to managing the coastline, the estuaries and the hinterland is essential. The current Alde-Ore Futures (Integrated Coastal Zone Management) project is an example of the way forward. The SMP can only be regarded as one aspect of coastal management and must be sufficiently adaptable to take into account other plans and the objectives of local communities. We trust that the public consultation on this SMP will take heed of public concerns and policies will be amended accordingly.		Fully agree. SMP is not a statutory document, it is recommended that the planning process takes full regard of the SMP. The interaction between SMP and ICZM initiative is recorded and discussed in the SMP. It is however essential that the SMP gives clear statements from a coastal management perspective as to the consequence of different management scenarios and where appropriate defines sustainable policy.	
A2b	N		SCC	Guy McGregor/Jane Burch	SCC believe that HTL should be default option for first epoch		•		The County Council believes that a Hold the Line policy should be used as the default policy in the first epoch, wherever a feasible option exists, whether national funding would be available or not. This would allow time to find appropriate local solutions for social and environmental adaptation. Changes such as roll-back of properties/ communities and the creation of compensatory habitat will take many years to achieve.		This would only prolong management decisions and in some areas lead to further problems with regards to sustainability. HTL is not current management policy for all areas of the Suffolk coast.	
A2c	N		SCC	Guy McGregor/Jane Burch	SCC concerned about availability of funding for long term proposed policies.	•			The County Council is concerned that whilst the stated SMP policy is Hold the Line or Managed Realignment, there is no guarantee of the funding to enact these policies. Policies must, therefore, be sufficiently flexible to encourage local and private action and investment.		Caveats have been incorporated into the SMP where local funded schemes would be acceptable.	

A2e	N		SCC	Guy McGregor/Jane Burch	DEFRA guidance does not take into consideration the changing government policy and funding arrangements.	•			The current SMP is clearly developed using guidance from Defra and linked to the current funding criteria for flood and coastal risk management. The guidance is flawed in that it looks at the coastline in isolation from the hinterland and fails to properly value the coastal assets in a wider context. Government policy and funding are ever-changing and it would be wrong to implement policies that cannot be reversed under different circumstances. As an example, the government is currently developing a new policy on food security in the light of climate change – which could affect the national view on losses of coastal agricultural land		The fundamental principle of the SMP is to advise on and develop a sustainable plan for the coast. Policy is then defined to deliver that plan. The approach taken, including policies where funding is uncertain reflects the emphasis placed by the SMP on meeting locally derived objectives for management. These take into account consideration of interaction with the hinterland. It is recognised that further work will be required to fully develop this integrated business case.	
A2f	N		SCC	Guy McGregor/Jane Burch	The SMP policies should be more flexible to change if changes need to be made at next review stage.		•		The County Council expects the SMP to be reviewed and amended in response to actual changes over the 100 year timescale. There are many assumptions underpinning the SMP which could change, and the policies must remain sufficiently flexible to allow amendment in the light of new knowledge of climate change and coastal processes, public or political opinions and associated funding. It is worth remembering that land once lost to the sea will never be recovered.		The SMP concurs with this view and sets out a plan which is considered robust despite uncertainty. However, in addition to the point being made with respect to loss of land, it is also essential that future generations are not committed to ever increasing expenditure on defence where there are appropriate alternatives which we can work towards in the present.	
A2g	N		SCC	Guy McGregor/Jane Burch	SMP needs to consider all assets and designations on the coast.		•		The SMP does not appear to effectively identify and evaluate the nature or extent of <b>all</b> the assets within the study area. Whilst it shows a clear understanding of the national and internationally designated biodiversity assets, it is weak when considering the landscape and other biodiversity assets, as well as issues of access, the historic environment and the value of community assets. Before it becomes acceptable to the County Council the SMP must re-evaluate all assets on a Suffolk-wide basis and be clearer in the way it links with estuary, spatial and other objectives/plans. Such an overview must include valuation of undesignated habitat/historic assets, landscape impacts, loss of agricultural production capacity, tourism/access and the like, and include those parts of Suffolk being considered under the Essex SMP - in order to assess the countywide impact of the changes/losses resulting from the proposed policies		We have received recently additional information on historic assets from English Heritage and the County Archaeologist which is being incorporated into the SMP. The SMP has attempted to contribute to the ICZM approach identified in this response. The plan only sets policy for coastal defence, recognising the need for planning to consider and determine policy with respect to many of the other issues raised. In taking this approach the SMP set high level objectives based on information contained within other plans and based on local features. These high level objectives, which the SMP has very largely met, were developed with the CSG and RMF. SCC were therefore involved with the setting of these objectives.	
A2h	N		SCC	Guy McGregor/Jane Burch	SCC to be involved in development of action plan		•		SCC recognises the importance of detailed discussions relating to the action plan and specific schemes related to the delivery of the SMP and will remain fully involved at all levels.		Action plan will be published in draft after the Members meeting on 16 November 2009. Key stakeholders will be asked to comment before it is incorporated into the Plan. The Action Plan will identify actors for all partners, one of whom is SCC.	
A2i	N		SCC	Guy McGregor/Jane Burch	Lack of integration between coast and estuaries	•			There is a fundamental flaw in the production of the SMP, in that it fails to properly link the management of the shoreline with that of Suffolk's estuaries. SMP 3d (Essex) is being produced covering the coast and estuaries together, which is a much more integrated approach. The adoption of the Suffolk SMP should be delayed until the estuarine plans can be properly integrated with coastal management.		This brief for this SMP was developed over two years ago at the time when the three estuaries had begun already. It was decided to proceed with the SMP on the understanding that the estuary study outputs would be available to the SMP. In the event, a delay in the completion of the estuary strategies meant that this was not possible. Nonetheless, the SMP aims to provide strong advice to the emerging initiatives being developed for the Suffolk estuaries.	
A2l	N		SCC	Guy McGregor/Jane Burch	Has there been appropriate integration between CFMP and SMPs?	•			It is not clear if the consequential upstream effects of coastal policies have been fully considered. For example, has there been proper integration of the SMP and catchment flood management plans in relation to the Minsmere and Kessingland levels?		Yes	
A2m	N		SCC	Guy McGregor/Jane Burch	The SMP does not emphasise the value of landscape		•		Landscape is not just about natural habitats. It is about the footprint of man over millennia and how that has shaped the habitats into what we see today. It is about the cultural aspects of the area and its sense of place. Landscape change is ongoing and whilst there is no aspiration to preserve it is aspic, it never has been thus. The SMP does not appear to fully understand the value and richness of what is being changed and or lost.		In section 3 of the SMP it states in many ways this. Landscape quality draws together the many aspects and activities associated with the coastline. The SMP highlights the context within which present human values exist. The SMP also highlights the changing nature of the coast. All these aspects have been taken into account in developing policy.	



A2n	N		SCC	Guy McGregor/Jane Burch	The SMP process should be consistent in reaching conclusions	•			The County Council recognises the difficult decisions needed in assessing whether policies are beneficial or not to the landscape. It is a subjective judgement whether additional rock armour at East Lane, that will protect the land behind the wider bay, is a positive contribution or not in an area designated for its soft and dynamic coast. Similarly it is hard to judge if allowing erosion at Easton Bavents is positive given the loss of properties, agricultural land and historic assets. The result is that there appears to be contradictions within the SMP. The County Council feel it is imperative that the process to come to these conclusions is open and available to examination and that the SMP should be amended in the light of local views expressed in response to this public consultation.		The CSG have reviewed the coastal policies to ensure that a consistent approach has been adopted. However it is recognised that circumstances differ along the coast as the character of the coast changes. All responses will be considered and appropriate amendments made to the SMP.	
A2p	N		SCC	Guy McGregor/Jane Burch	The SMP has not considered local designations and non-designated habitats.		•		For clearly understandable reasons the report has focused attention on the key internationally designated sites. However, this underplays the importance of capturing the contribution of other locally designated sites and non designated habitats to the biodiversity of study area. The close proximity of a wide range of habitats and landscape types means that the designated sites and the surrounding land have a wildlife value enhanced by heterogeneity.		The SMP recognises that the designated features do indeed sit within a broader mosaic of other habitats. NE's advice has been taken in assessing all impacts.	
A2q	N		SCC	Guy McGregor/Jane Burch	Concern over loss of freshwater habitats.	•			Loss of designated freshwater habitats along the Suffolk coast (including areas included in the Essex SMP) is of particular concern for two reasons. Firstly, it is unlikely that these will be recreated in the coastal strip and thus the landscape will be less diverse, and secondly because of the potential impact on other valuable habitats/landscapes elsewhere.		Response noted. NE's advice has been taken in assessing this.	
A2r	N		SCC	Guy McGregor/Jane Burch	SCC believe that the SMP does not regard the value of the assets on the Suffolk coastline	•			Suffolk's coastal economy is largely based on tourism, agriculture and numerous small local businesses. The County Council believes many assets have been undervalued and that the SMP fails to adequately assess the value of assets in a wider context. The total amount of land lost, through erosion or saline intrusion, may not be vast. However, the resulting impact on the landscape, transport infrastructure, tourism, local businesses, community assets and agricultural production maybe significant. For example, a farm losing a proportion of its productive land maybe rendered unviable and local production of specialist crops could end up being moved out of Suffolk – maybe overseas.		The SMP has taken a broad approach to this issue. If specific cases are identified then the conclusions of the SMP would be revisited.	
A2t	N		SCC	Guy McGregor/Jane Burch	Details and costs of relocating assets have not been included into the SMP.		•		In a number of places, coastal assets will need to be relocated – e.g. public rights of way and other informal access and car parks. It appears the costs and disruption involved in undertaking a managed realignment policy has not been properly assessed in the SMP development. This is an important part of the cost-benefit analysis needed to develop coastal policies.		As set out in SMP 2 guidance. The economic assessment is meant to be a check of the viability of the preferred plan. In areas, where economic factors are likely to be critical, this is explained in more detail. This level of detail would be included at a Strategy Level and not in the SMP.	
A2v	N		SCC	Guy McGregor/Jane Burch	The impacts of NAI and MR on tourism and landscape need to be considered.			•	Part of the re-evaluation of assets needs to be the value of the landscape and access to tourism. The total tourism value of the Suffolk Coast and Heaths Area of Natural Beauty was £166 million (East of England Tourism, 2006). The effect of No Active Intervention or realignment policies on this value of the landscape in economic terms is missing. For example the value of the Aldeburgh to Thorpeness Road. This is not about preserving this popular tourist route in aspic, but being fully aware of the costs and consequences of change.		Noted and will include values within the text. The potential adverse impact on the future of the road will be assessed fully at the strategic and scheme level.	
A2w	N		SCC	Guy McGregor/Jane Burch	Loss of public access and infrastructure will be detrimental to community.			•	Public access to the coast and its hinterland is a key asset and part of the coastal infrastructure. Public rights of way and other informal access will be lost by managed realignment and any loss without alternative public access being put in place will have a detrimental effect on both the ability of local communities to enjoy their natural environment and the attraction of the area to tourists, with consequent negative effects on the local economy.		Local access has been considered and discussed. The SMP text will be strengthened to reflect these comments. Will be identified in the action plan.	
A2x	N		SCC	Guy McGregor/Jane Burch	Higher profile to be given in the SMP to Public Rights of way and compensation measures.	•			The County Council expects a higher profile to be given to access within the SMP, and that a policy is established that where Public Rights of Way and other access are lost, measures are put in place to replace and where possible enhance the access, and appropriate compensation provided to land managers as part of the overall mitigation measures.		Local access has been considered and discussed. The SMP text will be strengthened to reflect these comments. Will be identified in the action plan.	
A2y	N		SCC	Guy McGregor/Jane Burch	Discussions required for re-routing the Suffolk Coast Path	•			The Suffolk Coast Path is an important asset both for the local community and visitors. If the coastline is to change, there will be a need for detailed discussions around re-routing this path and the associated costs.		Local access has been considered and discussed. The SMP text will be strengthened to reflect these comments. Will be identified in the action plan.	
A2z	N		SCC	Guy McGregor/Jane Burch	Concern that policies will make NE access more difficult	•			There is a need to clarify how Natural England's Coastal Access proposals are linked to the SMP. In many places, the SMP policies will make access more difficult.		NE have been closely involved with the SMP process. Will be identified in the action plan.	
A2ag	N		SCC	Guy McGregor/Jane Burch	Lack of national support for loss of historic environment		•		There is a serious gap in the national strategy for dealing with the loss of historic environment assets on the coast. No funding is available for mitigation – either the relocation of historic assets if feasible and/or their recording before loss.		Noted	

A2ah	N		SCC	Guy McGregor/Jane Burch	Relocation or recording of Scheduled Ancient Monuments is extremely costly, which has not been incorporated into SMP.	•			The development of the SMP has severely undervalued the historic environment, failing to take into account the actual cost of relocating or recording the asset, as well as the cost to the local economy of the loss. For example, the recording of Covehithe (the upstanding buildings including the medieval church and the below ground archaeology) plus Dunwich (the upstanding medieval Greyfriars Scheduled Ancient Monument and the below ground archaeological deposits) would cost £ millions. It is difficult to understand how the loss of these valuable assets can be reconciled with the fact that causing damage to a Scheduled Ancient Monument is a criminal offence!		We have received recently additional information on historic assets from English Heritage and the County Archaeologist which is being incorporated into the SMP. Will check that these issues are included. The economic assessment is meant to be a check of the viability of the preferred plan. In areas, where economic factors are likely to be critical, this is explained in more detail. This level of detail would be included at a Strategy Level and not in the SMP. Will be identified in the action plan.	
A2aq	N		SCC	Guy McGregor/Jane Burch	SMP does not consider detailed appraisal of re-routing or raising access routes.			•	The economic impact of increased flooding of local roads, and thus the need to raise or reroute them, does not appear to have been properly considered within the appraisal. This was a fundamental flaw in the development of the Blyth Estuary Strategy and a mistake that should not be repeated elsewhere.		Noted but the policies have been developed as set out in SMP 2 guidance. The economic assessment is meant to be a check of the viability of the preferred plan. In areas, where economic factors are likely to be critical, this is explained in more detail. This level of detail would be included at a Strategy Level and not in the SMP. The SMP has however considered the impact of loss of the roads.	
A2ar	N		SCC	Guy McGregor/Jane Burch	Access routes affected by flooding.	•			The following roads appear to be impacted by increased flood risk: B1127 at Potters Bridge, Road into Southwold, C road between Dunwich and Blythburgh, Reckford Bridge at Middleton, B1122 into Sizewell and C346 at Bawdsey.		All recorded in the SMP.	
A2as	N		SCC	Guy McGregor/Jane Burch	SCC highways estimate cost of raising B1127.	•			As a rough guide Suffolk County Council Highways Department estimates that raising the B1127 would cost over £2million today, thus the overall impact of policies in the longer term could prove very costly.		Noted	
A2at	N		SCC	Guy McGregor/Jane Burch	Flooding of access routes can impact local economy.	•			Flooding to highways is not just a local nuisance but can seriously impact economic activity as well as have safety implications. Even where it is not necessary to undertake major road-raising, increased flood risk will almost always result in additional costs of repair and clearing after a flood event.		Noted	
A3a	Y		EA	Sue Brown	General comments regarding presentation and content	•			General edits need to be made to the text and presentation.		Noted. Will amend text.	
A4a	Y		NE	John Jackson	NE agree with the conclusions of the SMP	•			NE agree the conclusions of the SMP and support the approach to monitor the coast for the Hollesley to East Lane area.		Noted	
A5a	Y		EH	John Ette	Definitions in Glossary.	•			We would like to see 'heritage assets,' 'historic environment' and 'mitigation' added, as these phrases capture key aspects of the SMP2: we would also like to see increased use of these phrases in the document, where appropriate	Heritage Assets "A building, monument, site or landscape of historic, archaeological, architectural or artistic interest whether designated or not. Designated assets may be World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park or Gardens, Registered Battlefields and Conservation Areas." Historic Environment "All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed flora." Mitigation "Practical measures taken to offset the impact of a policy upon physical assets. For the historic environment, this may be 'preservation by investigation' for archaeological features, or 'preservation by recording' followed by staged abandonment, demolition or re-location for listed buildings. There is no effective mitigation for the loss of historic landscapes."	Noted. Will amend glossary.	
A5b	Y		EH	John Ette	Key Principle wording	•			To bring the statement in line with English Heritage policy, we would appreciate its rephrasing to state "To support the historic environment and cultural heritage where economically, technically and environmentally sustainable"		Noted. Text will be amended.	
A5c	Y		EH	John Ette	Natural and Cultural Heritage	•			This subsection is at present inadequate, and we would like to see significant revisions – most notably, much clearer reference to the inter-relatedness of geology, heritage, and natural features along the coastline.	Geology It should be noted that a number of key geologic sequences along the Suffolk coastline are also significant for their associated Palaeolithic remains.	Noted. Text will be amended.	

A5d	Y		EH	John Ette	Natural and Cultural Heritage		•		This subsection is at present inadequate, and we would like to see significant revisions – most notably, much clearer reference to the inter-relatedness of geology, heritage, and natural features along the coastline.	<i>Heritage</i> This statement is at present extremely weak and does not reflect English Heritage's position on the importance of protecting heritages assets where at all sustainable. There is no listing of nationally designated heritage assets (for example, scheduled monuments and grade I, II* and II listed buildings along the coast), unlike Table 3.1 for the natural environment. p.3.12 'Roman Saxon town' does not make sense and ask if the word 'and' needs to be inserted? p.3.12 'sites or monuments' should be changed to 'designated heritage assets'. p.3.12 The final paragraph is also extremely weak, since it fails to note that the historic environment is irreplaceable – or that designated heritage assets should be protected wherever this is sustainable. Both these points are key aspects of English Heritage's stance. In addition, we would like reference to be made to 'mitigation', rather than surveying and recording. p.3.12 "the opportunity to sustain the historic environmental values in an appropriate manner" is a meaningless phrase. We would like greater clarity	Noted. Text will be amended.	
A5e	Y		EH	John Ette	Natural and Cultural Heritage		•		This subsection is at present inadequate, and we would like to see significant revisions – most notably, much clearer reference to the inter-relatedness of geology, heritage, and natural features along the coastline.	<i>Landscape</i> English Heritage feels strongly that consideration is given in this section to historic landscapes, for example the lengths of Heritage Coast covered by the SMP2. Also consideration should be given to the collective importance of historic patterns of settlement and land use, and their relationship to natural environment designations (notably, freshwater grazing marsh). We would like reference to be made to these aspects of the landscape. The final paragraph on p.3.14 hints at this, but the relationship between landscape value, both urban and rural, and historic environment should be stated more clearly, perhaps by referring to historic landscape characterisation.	Noted. Text will be amended.	
A5f	Y		EH	John Ette	Human (Socio-Economic) Environment and Activity, Section 3.1.4		•		p.3.15 "...heritage sites" ought to read "heritage assets". English Heritage feels that it would be beneficial to mention the numerous clusters of listed buildings within coastal settlements, and the role of conservation areas in protecting larger areas of most commonly the historic built environment		Noted. Text will be amended.	
A5g	Y		EH	John Ette	Natural environment 3.2.3		•		This subsection deals with sustainability issues directly affecting the natural environment. There is no equivalent subsection for the historic environment, which is also critical within the SMP2 as it is an irreplaceable asset. A separate subsection at this stage would allow brief examination of the threats that the historic environment is subject to and how these may be mitigated (for example, whether by sea defence or loss preceded by survey, recording, demolition or rebuilding elsewhere). It would also be a good opportunity to highlight the often substantial costs entailed by mitigation and that, whilst specific features may be addressed, there is no effective mitigation for historic landscapes.		Noted. Text will be reviewed in this context.	
A5j	Y		EH	John Ette	Plan for balanced sustainability.		•		The paragraph regarding Covehithe (p.5.7), whilst acknowledging the historic importance of the village, states that "it is not considered sustainable or desirable to attempt to manage the erosion". Whilst erosion may be inevitable, the lack of any management of its advance would put great pressure on achieving sufficient mitigation, which would need to be extensive.		It is estimated that the village could be lost in 40 years time. We note the concern over the timescale of loss.	
A5k	Y		EH	John Ette	Predicted implications of preferred plan.		•		There is not sufficient weight attached to the impact upon the historic environment, nor the likely cost of mitigation for some very significant historic assets.		This can be addressed by elaborating on impacts of policies in sections 5.	
A5l	Y		EH	John Ette	Implications of landscape.		•		This subsection is vague, and landscape needs to be considered with the historic environment as an integrated whole.		Will review and amend as necessary.	
A5m	Y		EH	John Ette	Implications on Historic Environment.		•		At present, this one paragraph is completely inadequate and cannot be supported by English Heritage. A number of proposed policies in the SMP2 will have a significant impact upon historic assets, either through loss or indirectly through substantial changes in their setting. Historic assets are a finite and non-renewable resource. We would like to see complete rewriting, in particular a stronger emphasis upon the irreplaceable nature of historic assets and that they will be protected wherever it is sustainable		Section 5 is intended to provided a very brief summary of impacts. However we will review the text and amend as necessary.	

A5n			EH	John Ette	Funding		•		There is no discussion of the sizeable costs that will be entailed by mitigating the loss of numerous historic assets; most notably the villages of Covehithe and Dunwich, and Scheduled Monuments of Leiston Abbey and The Hospital of the Holy Trinity. Reference should be made to the continuing lack of agreement as to who is financially responsible for the indirect effects of policies that lead to coastal erosion. Whilst the SMP2 cannot be expected to resolve these serious issues, they should be clearly flagged.		Fully agree. We will include a section addressing this.	

**APPENDICES**

Res.Ref	Accept SMP	PDZ	App	Management Area	Policy Unit	Organisation	Correspondence	Issues Raised	Response			Comment	Action Suggest	Comment/ Action in finalising SMP	Page No.
									Clarify	Info.	Policy				
GROUPS															
G10a			Appendix J (AA)			RSPB		AA does not set out habitat baselines	•			A common problem with the Appropriate Assessment (AA) is that it does not identify habitat baselines; these should be added so that where a transition is expected this could be measured and reviewed. The AA should include the areas (ha) to be compensated by habitat and qualified in terms of International features. Considering all of the Policy Development Zones (PDZ) in detail, the RSPB has the following comments:		Noted. AA has been carried out in accordance with guidance up to policy development stage, and has been agreed with EA and NE. Comments provided to be addressed.	
G9n			Appendix J				CLA	Rob Wise		•		In considering the appropriate assessment conducted for the SMP we are concerned about the methodology for assessing saltmarsh loss and the need for habitat recreation. This is a concern that the CLA has for the whole of East Anglia and not just for Suffolk		Noted.	
G9o			Appendix J				CLA	Rob Wise		•		While coastal squeeze does exist we are unconvinced that it is as significant as the government agencies contend - at least at the moment. There is much anecdotal evidence of saltmarsh gain in areas that have been designated as loosing saltmarsh. Additionally the accuracy of the data sources used to calculate saltmarsh loss in the last fifty years is questionable. We therefore question the figures government agencies are working with to establish habitat recreation targets. This is creating an overemphasis in the SMP for managed realignment.		Noted. The SMP acknowledges this uncertainty. If there are specific locations where over emphasis of the need for managed realignment in the Suffolk SMP is identified, then this will be addressed.	
G9p			Appendix H				CLA	Rob Wise		•		In considering the economic appraisal conducted for the SMP, we are heartened that, following guidelines these are to be taken as guideline values. More detailed appraisal would need to be conducted before any major change in policy was implemented. This will allow for the ever increasing amount of data on owner repair costs to be taken into account. Once these generally lower costs are taken into account the cost benefit analysis will shift in favour of hold the line policies.		Noted. In some areas it is sustainability, impact on other areas of the coast and other values of the coast (as noted in CLA response) that has determined the appropriate policy put forward by the SMP. Therefore it is not seen as being likely that there will be a significant shift in favour of additional hold the line policies.	
AUTHORITIES															
A1e			Appendix C			QRG	Steve Jenkinson	Section 4 to be drafted.		•		This appendix discusses coastal processes and geomorphology in some detail leading to predictions of shoreline change, but it appears that Section 4 is yet to be drafted? Presumably this will set out clearly assumptions relating to flood risks and erosion rates.	Could the project team advise when Section 4 will be available for review. Also, it would be helpful to explain where in the report the shoreline change assessments are presented in map form.	Erosion rate maps will be included in Appendix C as section 4. The format is under discussion with GCG.	
A1f			Appendix C			QRG	Jim Hutchinson, Emma Fisher	Further information is needed in Appendix C. It is not clear where futurecoast forms the baseline and where information has changed.		•		The report sets out the other documentation that has been used in the process assessment, including Futurecoast and so on. It is not clear where Futurecoast forms the baseline, and where information has changed since then with new references. [JH]. The SMP Guidance Volume 2 (2006) recommends that a coastal defence assessment is undertaken, but a Coastal Defence Assessment is not included with Appendix C. [EF]	Can the team please confirm what information has been developed since SMP1 has been used, including all the estuary work, etc, and what this indicates? [JH]. Please review the text and add references in where appropriate. Could the team provide some background behind the decision not to include a coastal defence assessment? [EF]	We will provide further explanation of inclusion of information. With the very good information coming from the EA monitoring process, information from Futurecoast added little. All defence data is held within a database, updating NFCDD with LA data. Hard copy summaries can be include if the CSG feel this is worth while.	
A1g			Appendix C			QRG	Steve Jenkinson	Clarification on NFCDD data used to inform policy selection. Will the version used have an impact on the preferred options.	•			Was data from NFCDD used to inform policy selection, and if so which version? If latest version not used, what impact will this have on preferred policy options (eg. estimates of residual life of structures)?	Could the project team please advise? And confirm within the plan what the implications might be?	Most up to date form of NFCDD was used. This gave poor representation of LA defences and local information has been collated in a form suitable for up date to NFCDD. There seems to be uncertainty as to the future format of NFCDD.	

A1u					QRG	Emma Fisher	Need to mention the RMF in introductory text in section B1.		•		<p>Section B.1 outlines that the three main groups involved in Stakeholder Engagement were: (i) Client Steering Group (CSG), (ii) KSF, and (iii) other stakeholders. There is no mention of the RMF in the introductory text in Section B.1.</p> <p>Section 1.1.3 indicates the three main groups were: (i) CSG, (ii) RMF (Representative Members Forum ) and (ii) key stakeholders. [EF]</p> <p>Section B1 lists 3 key groups involved and the Representative Members Forum [RMF] is not listed suggesting that this group are not considered part of the engagement process? [JH]</p>	<p>Consistent terminology is required throughout the SMP to provide clarity and prevent confusion.</p> <p>Provide text on RMF in Section B.1. [EF]</p> <p>Can the team please explain why this is the case? And if the RMF needs to be added to this section to ensure its involvement is fully reflected in the overall process. [JH]</p>	Will clarify.	
A1y					QRG	Roger Morris	Use the correct terminology and clarify certain terms.	•			<p>British Red Data Book - the definition is not correct. There are International Union for Conservation of Nature (IUCN) guidelines that have been followed in some recent revisions of Red Data Books (RDB) statuses but many of the RDB are old and applied earlier definitions. This needs to be explained. Also, including birds of conservation concern under this term is probably confusing Annex 1 with RDB - the two are not the same.</p> <p>It appears that a new term to wrap up unfavourable condition has been introduced for this plan. SSSI not in favourable condition or unfavourable recovering should be cumulatively described as unfavourable condition not adverse condition.</p> <p>Staff member responsible - Natural England or Environment Agency?</p>	<p>Can the team please use correct terminology and clarify as appropriate.</p>	Noted and will modify text.	
A1z					QRG	Roger Morris	Issue of coastal squeeze on N2k.	•			<p>Issue of coastal squeeze on N2k etc - pinning the coast at East Head cannot be interpreted from the Natura viewpoint as positive. There is no national policy to hold habitat in place if it does not want to be there. This tends towards the approach that it is necessary to prevent habitat loss to coastal processes when its unsustainable.</p>	<p>Can the team please revise in the context of NE conservation objectives for the area.</p>	Noted, but East Lane arguably sustains the natural function of the Natura 2000 site. The works are outside the Natura 2000 site. Wording under review to refer to the acknowledged uncertainty around the Hollesley Bay area. The explanation will be expanded in the document to confirm that East Lane point is being held for socio-economic reasons and impacts on adjacent habitats will be monitored through the AA and Action Plan to determine if the	
A1aa					QRG	Roger Morris	Important links with CHaMP in banks being created needs to be clarified.	•			<p>Note - the concept of habitat banking is not a formally adopted concept but is one that is developing in the context of flood risk management policy. The important point about the banks being created for flood risk management is that they are intimately linked to the production of CHaMP (Coastal Habitat Management Plan) and estimation of the need for offsetting habitat.</p>	<p>Can the team please confirm that the CHaMP for the area is fully integrated in the plan?</p>	Confirmed.	
A1ab		3, 4, 5, 6.			QRG	Roger Morris	The conservation target in not correct. Please use Natural England advice on management.	•			<p>The conservation target is not correct. Joint Nature Conservation Committee (JNCC) views on management are not the statutory advice; please use Natural England's (NE) advice only. Such advice from NE takes account of natural change and does not seek to fix systems in one place. Anything that prevents roll-back tends to exacerbate leakage and diminution of shingle supplies and exacerbates ageing and serial change on a dynamic system. Furthermore, the beach is clearly a part of the geomorphological features of the SSSI and this approach would not be compatible with maintaining the geomorphological interest.</p>	<p>Can the team please use correct conservation objectives set by the NE team and not JNCC interpretations and develop policies that are consistent with these. Is there any impact on the finding of the plan by taking NE's conservation objectives? .</p>	Terminology/definitions to be checked and amended.	
A1ac			B		QRG	Steve Jenkinson and Emma Fisher	Address in Appendix B responses to stakeholders comment.	•			<p>This appendix records in good detail feedback from stakeholders at workshops. An equally important part of the consultation process is explaining how comments have been dealt with. [SJ]</p> <p>Appendix B clearly documents responses from the stakeholder meetings, but the responses to these comments have not been addressed in Appendix B. [EF]</p>	<p>Could the project team explain how responses to comments will be recorded and published? [SJ]</p> <p>Include documentation showing how stakeholder comments have been actioned to ensure transparency.[EF]</p>	<p>i) all response to the consultation will be addressed and include in final App B. i) It is incorrect to sat that earlier responses have not been addressed. The SMP was presented in preliminary form to the KSG and all comments were addressed and changes recorded. The response from the formal consultation will be included in App B.</p>	
A1ae			B Table B1.1		QRG	Steve Jenkinson	Change terminology under stakeholders involved, previously misleading.	•			<p>The summary table sets out in some detail the stakeholder engagement strategy. However, the focus prior to the consultation phase appears to have been on the KSF (Key Stakeholder Forum) and RMF.</p> <p>Also, it is a bit miss-leading to include TOAL and RH under the "Stakeholders involved" heading. For example "Invitation letters sent to Key Stakeholders" might be more accurately described as involving Key Stakeholders, not TOAL.</p>	<p>Could the project team clarify what activities were undertaken to inform and engage the public prior to the consultation phase?</p> <p>Also consider amending table to provide more clarity and take out superfluous items</p>	<p>Point noted. The engagement strategy was focussed on KSF and RMF. This was the agreed approach.</p>	

A1ah		PDZ6:34			QRG	Roger Morris	Need to clarify increasing coastal stability as a benefit to the landscape.		•		The case that interpretation of increasing coastal stability as a benefit to the landscape is valid but is not clearly made. The landscape is one that is dominated by the dynamic nature of the coast and consequently the policy as it stands is likely to atrophy the coast.	Can the team please consider and set out a stronger more convincing case?	Noted and will clarify.	
A1aj				App Ass pg 30	QRG	Roger Morris	Use correct concept of coastal squeeze in para 6.3.5.	•			Para 6.3.5. - misinterpretation of coastal squeeze. Where shingle rolls back over adjacent wetland this is not coastal squeeze. Coastal squeeze is a distinct set of circumstances where inter-tidal habitat abuts man-made structures that prevent natural roll-over or roll-back.	Can the team please make sure correct use of the concept of coastal squeeze is applied throughout the plan and confirm that this has been done?	What is being put forward here seems to be a very narrow definition of coastal squeeze. The point highlights the danger of using short phrases to capture complex issues. Will clarify text in paragraph 6.3.5 in Appendix J.	
A1al			App Assessment pg 29		QRG	Roger Morris	Correct the interpretation of shingle vegetation.		•		I am concerned about the interpretation of shingle vegetation para 6.3.2. Perennial vegetation of stony banks varies hugely (e.g. from pioneer species such as Crambe maritime, through to scrub woodlands of Salix or indeed Ilex). Stability leads to a succession of habitats according to deposition of humus and where it is ancient this can lead to highly acidic healthy habitats. Thus, stable shingle habitats cannot be characterised as containing species that do not characterise stony banks. The shingle systems of Suffolk comprise both mobile (AVDL) and more stable (PVSB) and include some of the finest ridge vegetation in the UK - all because of stability.	Can the team please correct this, and provide some reassurance on this aspect of the AA?	Section to be rewritten to clarify approach.	
A1am			F 1.7		6QRG	Karl Fuller	Describe the relationship of the plan to other plans and programmes in the SEA report.		•		The SEA (Strategic Environmental Assessment) report does not include a description of the relationship of the plan to other plans and programmes. This is one of the required elements of an Environmental Report as well as being important to understanding how the plan is likely to 'fit' with other plans and policies relevant to the location.	Can the team please clarify whether an analysis of the relationship to other plans and policies was undertaken and indicate where this has been reported?	Other plans were considered, we will highlight and modify text.	
A1an			F, Table 2.1, Table 5.4		QRG	Karl Fuller		•			There are several concerns regarding the assessment of impacts: a) The separation of impacts into those that are considered minor, positive/negative and significant is welcome, but the criteria that determine whether an impact is significant or not is not clear. How is a significant impact determined? b) On a sample basis the assessment of some of the effects appears to be optimistic/best case. E.g. The first criteria for biodiversity refers to the sustainability of habitat management. For BLY 10.1-10.3 - the sustainability of the system is then used as the basis for claiming a minor positive impact on the condition of international sites and SSSIs (double counting?), despite identifying that the policy will contribute to ongoing decline in condition. The area of Bio-Diversity Action Plan (BAP) habitat is stated to remain the same, but a positive is identified (is neutral more appropriate?). The type of habitat is stated to change - are the habitat types of annual wetland? Appropriate Assessment should refer directly to Conservation Objectives published by Natural England. The conclusions of the assessment therefore need to be revisited and drawn up in the context of the Conservation Objectives. As it stands at the moment it would not be possible to conclude no adverse affect. As indicated elsewhere in this review, maintaining a balance between static and dynamic shingle features for the purposes of the Habitats Directive is an incorrect interpretation of the Directive and of Policy in England. Likewise, assessment of the impact of managed realignment at East Lane as adverse to Natura would be an incorrect interpretation.	a) Please clarify the basis for determining whether an impact is significant. b) Please check assessment tables to ensure double counting is avoided; assessments are appropriate to the criteria; and conclusions on significance are appropriate to the impact.	Clarification to be added.	
A1ao					6QRG	Roger Morris	Conclusions of the assessment need to be drawn up in context with the conservation objectives	•			Appropriate Assessment should refer directly to Conservation Objectives published by Natural England. The conclusions of the assessment therefore need to be revisited and drawn up in the context of the Conservation Objectives. As it stands at the moment it would not be possible to conclude no adverse affect. As indicated elsewhere in this review, maintaining a balance between static and dynamic shingle features for the purposes of the Habitats Directive is an incorrect interpretation of the Directive and of Policy in England. Likewise, assessment of the impact of managed realignment at East Lane as adverse to Natura would be an incorrect interpretation.	Can the team please comment on this statement and correct as required.	Under review, but unlikely to affect policy.	37-43
A1ap			App Assessment. Page 22.		QRG	Roger Morris	Consider points surrounding conservation objectives.		•		Interpretation but do constitute advice on attributes that form the Natura interest and the measures needed to maintain favourable condition. In the case of European marine sites, this advice is statutory under Regulation 33 of The Habitats Regulations. As written, the text suggests that other interpretations could be used (and indeed have been in places). 2). Whilst there is a need to provide a generalised interpretation of conservation objectives, care needs to be taken to highlight the key qualifier that has been used in Reg. 33 packages; namely Subject to Natural Change. In that context it is important to remember that coastal processes are regarded as natural change and interference with them would not be regarded as necessary to maintain or to achieve favourable condition. The exception is where anthropogenic changes mean that change is ongoing but is constrained by structures such as erosion control, bedrock or flood defences.	Can the team please consider the points and amend the reports as required.	Terminology/definitions to be checked and amended.	
A1aq					6QRG	Roger Morris	Changes to terminology	•			It is not correct to say that Appropriate Assessment is a requirement of the Wildlife & Countryside Act (1981) (as amended) (second para). AA is strictly a Habitats Directive issue.	Can the team please correct the issue.	Will correct.	

A1ar					6	QRG	Karl Fuller	Why the SEA only considers alternatives for four or more negative impacts? Mention the SEA in Figure 3.2? Has the SEA influenced the plan?		•		The SEA does not appear to have been used in such a way that it has influenced the plan. Figure 3.2 has no mention of the SEA and the SEA report only assesses alternatives for those areas where there are four or more negative impacts recorded (why four and why does this appear to disregard the significance of the effects?).	a) Please clarify whether and how the SEA has influenced the plan? b) Please explain the basis of the approach to the assessment of alternatives in the context of the requirements of the SEA regulations	The SMP has included the conclusions of the SEA. Will clarify.	21
A2o	N		App F (SEA)			SCC	Guy McGregor/Jane Burch	SCC disagree with the statement that the proposed policies will have a positive affect on the environment.	•			The County Council's view is that it is inaccurate for the SMP to state that the proposed policies will be positive for the environment overall (Strategic Environmental Assessment, page 55). Parts of the designated AONB will be lost or changed forever. Freshwater habitats and agricultural land will be lost (or devalued by saltwater intrusion), small isolated communities will be more at risk and the visual appearance of the coast will change. These are all part of the environment and landscape and the reasons behind the AONB designation.		The SEA has been undertaken in consultation with all appropriate bodies. The SEA, in line with requirements, is set out in a transparent manner so that the rational behind all conclusions is clear and open. This response will be noted and clarification provided as necessary.	
A2ai	N		App F (SEA)			SCC	Guy McGregor/Jane Burch	Landscape value of historic monuments has not been considered.		•		As a high level strategy the SMP identifies and gives some consideration to designated scheduled monuments, but there is no attempt to assess these monuments in their landscape setting or in relation to each other or to other less significant historic assets. Although the coastal grazing marshes are an essentially artificial landscape their significance as such seems not to be considered. For example, the landscape loss of Leiston first abbey is seen in landscape terms as the loss of a single 'small chapel' (SEA, 5.4.4) ignoring the relationship of the abbey site on its island with adjacent early reclaimed marshland.		Noted and will clarify.	
A2aj	N		App F (SEA)			SCC	Guy McGregor/Jane Burch	SEA scoring system of historic environment is not clear.	•			The County Council feels the SEA scoring system needs to be challenged with regard to the assessment of the historical environment. Within the document the destruction of regionally important assets has been allocated as a "minor positive" outcome. This is at odds to other similar assessments of our built heritage.		Noted and will clarify.	
A2an	N		App F (SEA)			SCC	Guy McGregor/Jane Burch	Greyfriars Monastery omitted from SEA.		•		PDZ3/PDZ4: At Dunwich there is a major omission in the Strategic Environmental Assessment as the nationally important Greyfriars Monastery has been completely omitted, falling as it does just south of the PDZ3/PDZ4 line. The text refers to it (PDZ3:32) but only in terms of the upstanding ruin rather than the site as a whole. The estimated cost for full recording by excavation of this site was estimated at £1million, 10 years ago.		Noted	
A5o			Appendix D			EH	John Ette	Natural and built environment. Section 6		•		This section would benefit from tabulated listings of the statutory designated historic assets found within each geographic subsection (e.g. Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens).			
A5p			Appendix E			EH	John Ette	Issues , Features and Objectives.		•		"...between the River Tyne and Flamborough Head,;" this requires correction.		Noted. This will be amended.	
A5q			Appendix E			EH	John Ette	Issues , Features and Objectives.		•		All Listed Buildings across all three tiers of significance are recognised by the Secretary of State to be of national significance. This should be indicated clearly in the table.	"Heritage sites" should be rephrased as 'heritage assets'. Entries 244, 378, 9, 445 and 480 have inconsistency between Grade II" in the 'Issues' column, and Grade II in the 'Benefits' column. Entry 488 should be indicated as being of national significance, as it is a Scheduled	Noted. This will be amended.	
A5r			Appendix F SEA			EH	John Ette	The Historic Env. 3.3		•		There ought to be reference that, whilst designated historic assets provide an indication of the significance of historic environment along the coastline, many important archaeological features are not designated in the inter-tidal zone due to the dynamic setting. Similarly there is likely to be unknown and therefore undesignated archaeological sites in the area. The data in the SEA thus provides a guide, but is not comprehensive.	We welcome the reference to the scheduled monuments within the study area (p.20) and would like this to be extended to include historic assets that are protected by the other statutory designations	Noted. This will be reviewed and clarification provided.	
A5s			Appendix F SEA			EH	John Ette	Environmental issues Sect 4.1		•		Reference to the "...North Norfolk coast." requires correcting		Noted. This will be amended.	
A5t			Appendix F SEA			EH	John Ette	Issue - maintenance of the archaeological and historical features of the Suffolk coast, Section 5.4.5		•		Whilst the losses of the Hospital of the Holy Trinity and Leiston Abbey are mentioned, there is no discussion of the village of Covehithe. All these losses are of great concern to English Heritage, since mitigation is never as good as preservation.			



A5u			Appendix F SEA			EH	John Ette	Investigation of coastal culture and archaeological sites.		•		Like Section 5.4.5, this section also over-relies on reference to Scheduled Monuments when identifying likely major losses. We feel it is essential that the loss of Covehithe, and numerous significant but undesignated historic assets (notably, inter-tidal archaeology) is also flagged. It is, however, appreciated that the issue of funding has been raised in this part of the report.			
A5v			Appendix F SEA			EH	John Ette	SEA assessment table, Appendix 1		•		Table A2.6 The gradual/natural approach to realignment should, at best, be regarded as having a neutral impact upon the historic environment – due to provision of adequate time for mitigation. The presence of time does not convert the loss of historic assets into a positive or minor positive, as losses to the historic environment can never be fully overcome by mitigation. Indeed it states in the draft PPS15 in Policy HE13.1 that a documentary record is not as valuable as retaining the asset.			
A5w			Appendix H			EH	John Ette	Poor economic assessment of Historic Assets		•		The poor economic assessment of historic assets is most evident in Appendix H which seriously undervalues or omits the monetary value of such sites, despite some costs being previously established following SMP1		Noted. This will be reviewed in revision to Appendix H.	

PDZ1									
Res.Ref	PDZ	Management Area	Policy Unit	Organisation	Correspondence	Comment	Action Suggested	Comment/ Action in finalising SMP	Page No.
<b>INDIVIDUAL</b>									
i26	1				K Sweetman	Agreed with policy.		Noted.	
i29	1				Sonia Coleman	Agreed with policy.		Noted.	
i40	1				Linda Clark	Agreed with policy.		Noted.	
i41	1				Mrs P Sweetman	Agreed with policy.		Noted.	
i42	1				Anon	Agreed with policy.		Noted.	
i53	1				Mrs J A llen	The information was OK as far as it went. However, it was not detailed enough and rather vague.		Noted	
i55	1				Bernard Reader	The SMP does not make any comments on how the cost of defences is to be funded i.e. From Central Government, Local District or if Parish Councils can help via the rate (word not clear) or key local people whose property is affected.		We will look to clarify the SMP position on this.	
i65					Mike Betts	I have been viewing the plan for defences on line. I live at 58 Pakefield Road opposite the car Park and overlooking the sea. I am heartened by the plans referral to the Pakefield road headland being seen as an important feature in defence plans and also that possible strengthening of this area is being considered. Would you be able to reassure me that I am in fact reading the data correctly for this piece of the plan and also advise what plans if any there might be for work on this area of defences? I have photographs from 1963 and the difference in how things were kept and looked after aesthetically is huge. The area and the sea wall is quiet tired at present. As this is a major tourist area for Lowestoft it seems to me that not only would strengthening defences secure housing but also add value to the area in terms of it being a pleasant outlook. What is also noticeable about the photo from the 60's is that the sea was right up to the wall, which is different from the long beach and Maram grass now present.		Clarification will be provided,	
i67	1	LOW04	4.3		Dr Jane Boys	You will be aware of the recent consultation on the technical report which is proposing amendments to the current plan that has been in place for 10 years. There was a local meeting in Kessingland, but there was no meeting in Pakefield. My concern is that the proposals appear to be reducing the protection planned for Pakefield. It is a complex and lengthy document. If it would help I would be happy to send you the relevant extracts		SMP policy strengthens the intent to maintain Pakefield.	
i68a					Dr Martin Parsons	There is no justification for any assumption that some areas of the coast need to be allowed to erode in order to provide sediment for other areas. The scientific evidence is clear that most beach sediment does NOT derive from coastal erosion		Clarification will be provided,	
i68b					Dr Martin Parsons	There is evidence in terms of the geological origin of beach pebbles found at Kessingland of offshore movement of pebbles sized material that is both well beyond the breaker zone and from areas outside of the sediment cell. As such serious consideration should be given as to whether the dredging of aggregates offshore of Pakefield may be adversely affecting rates of coastal erosion		Noted. The issue of dredging is discussed.	

i68c	1	LOW04	4.3		Dr Martin Parsons	There appears to be an assumption in the shoreline management plan that the retreat of the cliffs to the South of Pakefield is primarily due to coastal erosion, whereas the cliff profiles there suggest that sub aerial (weathering and mass movement processes) are more likely to be dominant with the sea removing collapsed material. As such a range of low cost slope stabilisation strategies may be possible, such as the lowering the slope angle and vegetating the slopes. These adjacent cliffs at Kessingland where similar actions were taken many years ago contrast markedly with those at Pakefield.		As noted the continued process of weathering is exacerbated by coastal erosion resulting in further recession of the cliff.	
i68d	2	BEN06	6.1		Dr Martin Parsons	The position of the proposed new clay bank in South Kessingland will effectively abandon both the village sewage works and 2 streets of permanent residential housing to the sea. At the consultation in Kessingland, the environment agency manager assured me that this clay bank had been drawn on the map 'in the wrong place'. However, it would be appreciated if this could be confirmed in writing and a revised plan put in the final version of the new shoreline management plan		Clarification will be provided on this issue.	
<b>AUTHORITY</b>									
A1k		BEN2		QRG	Stuart Rowe	Policy was NAI (SMP1) now in 4.2 its HTL, HTL + MR. How does this HTL fit with what was NAI ( isn't this all new policy?)	Can the team please comment on this and explain the consequences of this?	This relates to adjacent policy providing greater protection to Pakefield. However there has to be long term consideration of realigning the frontage, moving away from the linear approach taken at present.	
A1aw	1. pg 33			QRG	Steve Jenkinson	The economic summary table does not include any costs.	In cases such as this where no costs are presented could the project team explain a) why there is no estimate set out in the report and b) how the economic viability of the preferred option has been assessed?	The SMP has clearly stated that risk management within this area needs to be developed within a framework for development. While the SMP concludes that flood risk management in the area is sustainable if this integrated approach is adopted, it is not sensible to attempt to place any costs on such manage. Will explain reasons in PDZ1 Page 33.	PDZ1:p33
A2s				SCC	Guy McGregor/Jane Burch	The impact of the SMP policies on development of coastal towns and villages is uncertain. The Hold the Line policy around Lowestoft suggests a positive future for the town, but the SMP notes an increased flood risk and urges caution over residential development – which will be difficult for any planning authority to ignore. The changes proposed in the Communities and Local Government's new policy on planning and coastal development (updated PPS25) suggest a greater influence for the SMP and it is therefore necessary to ensure that SMP policies have regard to those within the Regional Spatial Strategy or Local Development Frameworks. The links between the SMP and statutory planning documents are not made clear in the document.		Throughout the policy development process, LDF's and RSS were obtained and reviewed. Meetings were also held with WDC and SCDC planners to discuss implications of various policies on planning issues. Planning issues have been included in development of policy. Planning guidance has been provided in management area statements. This will be reviewed and strengthened where necessary.	
A2ak	1	LOW4	4.3	SCC	Guy McGregor/Jane Burch	PDZ 1: LOW 04 includes reference to the policy of No Active Intervention at Pakefield Cliffs encouraging fresh exposures for study. This should be in KES05, the site of the internationally important Palaeolithic material being south of the management area division. There is significant potential loss of a Roman site on the top of the cliff at the division between the areas LOW04 and KES05. This is a typical example of a site that is undesignated because it has not been archaeologically assessed.		RH to change location of this detail.	

## PDZ2

Res.Ref	Accept SMP	PDZ	App	Management Area	Policy Unit	Organisation	Correspondence	Issues Raised	Response			Comment	Action Suggested	Comment/ Action in finalising SMP	Page No.
									Clarify	Info.	Policy				
INDIVIDUALS															
i1	N	2					M W O'Connell				•	The SMP Plan of no active intervention have ignored the problem of flooding on the main A12 route, also like PDZ2 is in an area classified by Natural England as a SSI area. It may be helpful to look at the schemes in Norfolk e.g. The rock reefs at Happisburgh which seems to be successful.		SMP does include comment on A12 as a key objective. Will clarify importance of retaining strategic route.	
i28	Y	1, 2					J Horwood					Agreed with policy.		Noted.	
i15	N						Edward Vere Nicoll				•	I reject the proposal of No Active Intervention on the coastline from Benacre Broad to Easton Broad including the village of Covehithe, on the stated basis that there is need for erosion to feed the long shore drift South. Even if this need is accepted, about which we are not clear, there is no proposal for compensation for those who live in Covehithe village or for the historic ruin, church and properties in the village.		The policy is in line with the Coast Protection Act (1949). Under current Government Policy, payment of compensation is not permissible. No change of policy.	
i18	N	1,2,3					Unknown				•	It would appear that a decision to sacrifice land has been taken without really considering the effect on the area concerned. Do not agree with the policy because various dwellings and the magnificent church at Covehithe will be lost to the sea.		Noted.	
GROUPS															
G1c	N	2		Cov 07	7.1	SCAR	Graham Henderson	Disagree with NAI for Benacre Broad to Easton Broad.			•	SCAR rejects the proposal of No Active Intervention on the coastline from Benacre Broad to Easton Broad including the village of Covehithe, on the stated basis that there is need for erosion to feed the long shore drift South. Even if this need is accepted, about which we are not clear, there is no proposal for compensation for those who live in Covehithe village or for the historic ruin, church and properties in the village.		Sediment feed is essential to maintaining defences at Southwold. Compensation is a national issue that is being discussed at a national level, however at present SCAR is correct in identifying that there are no proposals for compensation.	PDZ2:39
AUTHORITIES															
A1o		2				QRG	Steve Jenkinson	Need to economically justify units BEN 6.1 and 6.2 from current withdrawal to HTL.			•	Units BEN 6.1 and 6.2 appear to be promoting a short-term change from current withdrawal to HTL for the first epoch, with no economic justification to do so.	Could the project team simply clarify the thinking behind this please?	This together with a discussion of the economics is presented in the SMP text. The WPM policy for 6.2 is HTL epoch 1 from EA strategy. This goes into more detail than covered by the SMP.	PDZ2:19,20
A1at						QRG	Roger Morris	Concerns over loss of freshwater environments.	•			Proposals for Kessingland Levels (Hundred River) seem to be both unimaginative and likely to lead to an unsustainable solution, with FW wetland being created behind a defended line that will probably need to go back further or could have gone back further in the first instance. This is an excellent opportunity to restore an estuary and to create a whole system approach to both restoration and to coastal management. I also query proposals to create a hard point to the south that would act against the Conservation Objectives for the SSSI, as well as disrupting sediment supplies to more southerly locations. This seems to be the antithesis of the management needed to secure holistic management of this section of coast.	Can the team please revisit and set out in the plan more sustainable solutions for Kessingland levels.	The comments are made from a single perspective of nature conservation and do not take account of the broader balanced sustainability issues as set out in the agreed objectives for the area. All issues considered and taken into account in the preparation of policies. Some issues will be considered in scheme development. Too detailed for SMP.	

A1az		1, 6				QRG	Steve Jenkinson, Roger Morris, Jim Hutchinson	Clarification on funding requirements.	•			The summary p. 39 notes that the plan might require funding beyond FCERM funding. The summary p. 45 notes that funding may be a significant issue with regard to achieving a robust plan. For PDZ 6 the SMP is clear that future works for some of these units may need to be funded from alternative sources. [SJ]	<p>Could the project team comment on the messages that are being conveyed where it appears that the proposed policy options are unlikely to secure central government funding? Is there a reasonable expectation of alternative funding if it is required or is it purely speculative statements? What actions will be included in the Action Plan to establish the viability of the preferred policies? [SJ]</p> <p>Please explain the economics of holding the line throughout the Deben and how funding will be found for what appears to be uneconomic sea walls. Also, what factors would make navigation within the of the Deben increasingly difficult? This may be so if over time the mouth is not allowed to widen, but were it to do so, surely this may alleviate some navigation problems - at least for recreational craft and the small fishing vessels involved? [RM]</p> <p>Can the team please explain what it would mean for this area if there was no future private funding and if this would lead to a change of policy, perhaps in epoch 2 or 3? Can the team state the robustness of the approach adopted in these cases? [JH]</p>	(1) The SMP does highlight the default policy if funding is not available. This will be reviewed and further clarification provided as necessary. Caveats have been included to this effect at Kessingland, the Blyth, East Lane and mouth of the Deben. The SMP has followed the intent of Making Space For Water, in identifying where there may be opportunity for joint collaborative funding to deliver sustainable risk management.	
A2aa	N	2		COV7	7.2	SCC	Guy McGregor/Jane Burch	Need to seek improvements to access at Potters Bridge	•			PDZ2: Potters Bridge area. Access is already restricted at times due to flooding, and there is a need to seek improvements to the coastal path with potential diversion of route. Loss of key access links at Covehithe, a popular tourist route.		SMP does not preclude local works of Potters Bridge. No action proposed.	
A2al	N	2	App F (SEA)			SCC	Guy McGregor/Jane Burch	Area has been undervalued in terms of historic environment.	•			PDZ2: This zone has been seriously undervalued in heritage terms, with no mention of heritage/historic environment in the stakeholder objectives and underscoring in the SEA, due largely to over-reliance on designation datasets. The northern part includes at least one archaeological site known only from surface finds. The southern part encompasses the loss of an entire medieval (and potentially earlier) settlement at Covehithe plus its likely harbour area on Covehithe Broad. Assessment is based solely on the upstanding features (church etc) and uncertainty as to whether erosion will reach this far in 100 years, resulting in a comment that the overall effect will be neutral. This fails to recognise the evidence that the settlement was formerly much larger and thus the archaeological deposits will be lost imminently.		References made in the SMP document to the loss of former areas of Covehithe and the importance of the area will be strengthened. The further information provided by English Heritage will be incorporated into the SEA.	
A5h	Y	2				EH	John Ette	Benacre Ness to Easton Broad Sect 4.2	•			We would like to question why the historic environment has not been included within the stakeholder objectives. The historic qualities of the landscape have been recognised in the preceding 'Heritage and Amenity' overview, and therefore feel strongly that the historic environment should form one of the stakeholder objectives for this section. We feel this is symptomatic of the overall failing to see the historic environment as a key element of the plan.	p.PDZ2:13 The Economic Assessment table provides no indication for loss of historic assets, for which costs extend from mitigation of those assets to loss of tourist and amenity value. The likely cost of mitigation for Covehithe will be extremely high, and it is misleading to omit this from the table. This comment may be extended to the other PDZ sections. p.PDZ2:14 The General Assessment of Objectives makes no mention to loss of historic assets, as a result of its omission from the stakeholder objectives for this PDZ.		

## PDZ3

FDL3																
Res.Ref	Accept SMP	PDZ	App	Management Area	Policy Unit	Organisation	Correspondence	Issues Raised	Response			Comment	Action Suggested	Comment/ Action in finalising SMP	Page No.	
									Clarify	Info.	Policy					
INDIVIDUALS																
i7	N	3					Laura Martin				•		The maintenance of the defences at Southwold rely on their effectiveness on the erosion of the Easton Bavents cliffs. These cliffs support my home at Four Winds, Easton Lane. I can see why the maintenance of numerous properties in Southwold should take preference over maintenance of a few at Easton Bavents. However, the fact remains that my home will be sacrificed for the benefit of others. If this is to be the case, what recompense can I expect for this sacrifice? In the end I may become homeless, possibly at an advanced age. Will I be eligible for re-housing under the current procedures?		The concerns are noted. The SMP approach recognises the potential loss. The policy is in line with the Coast Protection Act (1949). Under current Government Policy, payment of compensation is not permissible. No change of policy.	
i9	N	2,3					Peter Boggis				•		No. It doesn't fulfil its original objects in relation to human habitat at Easton Bavents. It makes no provision for projected private sea defence at Covehythe. There is no public advantage in encouraging the ness to advance further westwards. It is already in its next protecting position.		Noted. These issues are discussed in the SMP.	
i11	N	3					David C B Webb				•		Do not agree with the policy. Overall the SMP2 preferred policies are far more palatable than those produced by the Environment Agency for the Blyth Estuary and the Walberswick to Dunwich frontage. Nevertheless it is believed that SMP2 needs to be challenged on the policy to withdraw maintenance from Tinkers marsh flood banks from the present day and in the medium term from the bank protecting Robinson Marsh. Should these marshes flood then the affect of the additional water flow on navigation and on the harbour mouth structures will be very damaging. Given that it is intended to maintain the harbour mouth structures and the line of the south training arm, the maintenance of the dunes on the Walberswick side is very important. The policy for these dunes is "managed retreat" but at present there is no management at all and they are being damaged by too many "visitors".		These issues are being addressed through the partnership approach involving the Blyth Estuary Group, EA and Local Authorities. The SMP sets an appropriate framework for these discussions. Will clarify issues relating to Walberswick Dunes and include action to monitor and manage human trampling.	
i17	N						Emily Whalley and Nicholas Pratt				•		We have lived on Ferry Road, Southwold for many years and before that my uncle lived there so our connection is very strong. It is a very distinct place, as is the surrounding Southwold, Covehithe, Walberswick and Dunwich area which needs to be maintained as a whole and protected from the sea, which has been done for 400 years. The policy of managed retreat proposed by the EA in 2007 would have had far-reaching consequences and was an unnecessary abandonment policy of this unique area. I consider the recent proposition to not maintain the existing concrete sea defence north of Southwold would make Southwold more vulnerable to the sea and it would be create a weakness to the whole area's sea defenses. It would not be economic either, to allow the sea to come in sooner, north of Southwold, as it would be more costly to remove the sea defence, once it had deteriorated, and then to build a new wall further back. It would be more sensible and cost effective to maintain it and to hold the line as is being done with the majority of the area.		These issues have been considered in the SMP. The SMP approach allows for a more sustainable means of providing protection.	
i45	Y	3, 4					Dunwich Parish Meeting				•		Dunwich Parish Meeting welcomes the recognition by the draft onshore management plan of the need to maintain Dunwich as a viable community, the Plan's appreciation that flood defences at Dunwich are both essential and sustainable, and its acknowledgement that there is scope for replacement of the experimental trial beach defence with similar but slightly more resilient low-lying groyne which could allow Dunwich to form as a slight headland. The Parish Meeting appreciates the positive and constructive approach taken by the Plan both towards the management of Dunwich's various sites of archaeological significance and towards the viability of the community as a whole.		Noted.	
i46	Y	2, 3					Mrs J M Hall				•		When will Southwold harbour be repaired? The whole scheme depends on it. (Urgent).		Concerns will be passed on to Waveney District Council. Action to be included in the Action Plan.	
i50	Y	3					T V Robinson				•		I met Adam Burrows of the Heritage Hut at Walberswick - he did his best to explain the recommendations. Most proposals seem sound. Only serious concern is for the Robinsons Marsh area. There was talk of a wall continuing across the road past Old Vicarage Cottage and across the marsh - tucking into the Old School Fields. I hope this idea has not been thrown out. Generally yes, but protection of east end of Robinsons Marsh properties is paramount. Accompanying letter: If the river walls are to be heightened and, we hope, the Robinsons Marshes will remain dry at the highest tide, there remains a problem. The tide will encroach from the quay up the road and surely will rush to fill up the marsh between Marsh View and Old Vicarage Cottage, possible undermining the buildings. The answer to this is to continue the earth wall across the road with a tidal gate and join the wall from the Ferry Hut.		Noted. This will be considered at scheme level.	
i61	Y	3					Donald Sewell				•		In favour of "Hold the Line". My view is that the only threat to the Town Farm Marshes (to the north of Southwold Town) would come from a failure to maintain the sea defences between Easton Bavents cliffs and the sea wall to the north of Southwold Pier.		Noted. The SMP is putting forward a more sustainable means of defence in the area.	

i66a	N	3		SWD08	8.2		Peter & Margarita Osgood	Disagree with MR to the north of Southwold			<ul style="list-style-type: none"> <li>Our primary concern is the SMP2 proposal to apply a 'managed realignment' of the shoreline along the line of the existing seawall frontage north of Southwold Pier. It is understood that the flood defence seawall concrete structure, apparently in a satisfactory condition, would be removed during the 'second epoch, 2025 to 2055', allowing the Easton Marsh area behind the sea wall to flood and become 'salt marsh'. This proposal would necessitate extensive flood defence works and maintenance control around the whole of the perimeter of the new salt marsh. Construction and maintenance of a 'significant structure' to 'heavily defend' the Southwold Town frontage just north of the Pier and the new 'shoreline frontage' will be necessary, together with 'some form of control over the northern section of the frontage' to stop outflanking.</li> </ul>		Noted. The SMP is putting forward a more sustainable means of defence in the area.	
											The removal of the sea wall structure and provision and maintenance of the extensive new flood defences to property and roads would represent a considerable cost, far in excess of the retention, maintenance and extension of the existing seawall frontage. To maintain and extend the seawall, as a first line of flood defence, is in our view a preferred way to safeguard Southwold and Reydon. FRG oppose the SMP Review proposal.		Noted. The SMP is putting forward a more sustainable means of defence in the area.	
i66	Y	3		SWD9	9.1		Peter & Margarita Osgood	Maintenance of the Denes is critical		<ul style="list-style-type: none"> <li></li> </ul>	<p>The Denes sand dune flood defence system has clearly been a success. It should therefore be looked after. The following repair, maintenance and monitoring should be considered :</p> <ul style="list-style-type: none"> <li>(i) Repair the seaward face of the sand dunes.</li> <li>(ii) Plant Marram grass where necessary, fence off to exclude the public, to aid recovery and sand catching.</li> <li>(iii) Provide signs to inform walkers about the importance of the sand dune flood defences and to encourage the use of established paths and steps.</li> <li>(iv) Find a method for reducing the damage done by rabbits to the sand dune bank along Ferry Road.</li> <li>(v) Monitor the sand dune system annually and ensure that there is an ongoing maintenance programme</li> </ul>		Noted. Information will be passed on to the Environment Agency. Action included in Action Plan.	
GROUPS														
G1e	N	3		SWD08	8.1	SCAR	Graham Henderson	Time required to consider Easton Bavents Policy	<ul style="list-style-type: none"> <li></li> </ul>		The changing attitude at Easton Bavents as a result of current negotiations between Natural England, The Environment Agency, Waveney DC and Peter Boggis, alongside the human rights history as approved by the Secretary of State with regard to the Charles England appeal, requires more time before completion of the SMP2 decision for this part of the coast. Government policy must take into account the rights of the individual citizen.		This seems in line with the approach put forward in the SMP. Action included in Action Plan.	PDZ3:40
G1f	N	3		BLY 9 and 10		SCAR	Graham Henderson	Issues with Blyth estuary funding	<ul style="list-style-type: none"> <li></li> </ul>		Blyth estuary funding and other outstanding matters of defence		This is being taken forward in partnership with the Blyth Estuary Group, EA and local authorities. Action included in Action Plan.	
G2e	N	3		BLY10		Suffolk Coast and Heaths	Nick Collinson	Why is there a NAI policy for the Blyth whilst the Blyth group have proposed HTL.	<ul style="list-style-type: none"> <li></li> </ul>		<p>BLY 10.1 is NAI, yet the Blyth Users Group application is effectively a HTL scheme. What is the role of the SMP if local action can fly in the face of SMP policies</p>		The SMP identifies areas that could be defended without having adverse affects on the coastal process, however would not be economically justified. Therefore privately funded defences would be acceptable. However there are other areas where private works would not be approved due to impact on other features of the coast. This has been highlighted.	
G6	Y	3		BLY10		Blythburgh with Bulcamp & Hinto		Concern that work carried out in the estuary will impact the A12.	<ul style="list-style-type: none"> <li></li> </ul>		<p>The Parish Council noted the conclusion that management upstream of the A12 had already been shown to have little overall influence of estuary behaviour and hence the Shoreline Strategy (Ref. PDZ3: 11 and 30). The document assumes that there will be an increased probability of flooding in the area of the estuary upstream of the A12. This is a most disappointing assumption. Given that the defence of the A12 has been identified as being essential (PDZ3: 30) the Parish Council believes that the impact on the upstream area of any work to defend the A12 must be considered. There are properties at risk in Blythburgh in Church Lane and on the seaward side of the A12. Key links in the Public Footpath network are already cut or are threatened.</p>		The function of the A12 would be maintained under the SMP policy. County Council funding proposed to reduce flood risk. Action included in Action Plan. Local risk to property is noted.	
AUTHORITIES														

A1h		3			QRG	Roger Morris	Clarification between Pye's description of trends and monitoring over the past 5 years. Reference being a reflection of available data.	•				It is not clear what is meant by the "apparent anomaly" between Pye's description of trends and monitoring over the past 5 years means. The reference to it being a reflection of available data is open-ended. Is the text saying that Pye is right and that the data over the past 5 years are too limited to infer erosion; or that actually Pye is working with limited long-term data and the extrapolation is not confirmed by observations in the past 5 years?	Can the team please clarify this text, and set out any implications of this on the final plan.	Will clarify "apparent anomaly" in text on Blyth Estuary.	3.11
A1i		3			QRG	Alison Baptiste	Further description required for policy unit BLY10.2 and DUN11.1&11.3		•			I couldn't find justification for the policy option HLT for policy unit BLY10.2 other than "the defence of the A12 has been identified as being essential. It is concluded that the policy here would be to 'Hold the Line.'" page 3:30. Similarly for policy unit DUN11.1 & 11.3. "Defences against flooding at Walberswick and Dunwich would need to be considered in detail but are considered essential and sustainable." page 3:32. There is no description of basic assumptions or justification for these statements. I don't disagree with them but the descriptions of the other policies are very thorough so these stand out as inadequate.	Please add a few additional sentences setting out reasons why these policies have been considered 'essential'.	Will add additional justification.	3.32
A1l			Section 5		QRG	Emma Fisher	Walberswick to Dunwich MR scheme to be mentioned in S5,p5.8		•			The SMP policy appears to tie in with the Walberswick to Dunwich MR scheme currently entering delivery phase, but the scheme should be mentioned in S5, p5.8.	Please review text relating to the Walberswick to Dunwich frontage.	Yes, the scheme does conform to SMP policy. Information about the scheme came after writing this section of the SMP documents.	
A1n		3		BEN5	QRG	Roger Morris	Concerns over the SMP allowing private defences which have previously been thought to be uneconomic.	•				The way this SMP has been constructed and phrased is quite different from other plans. It seems to give the green light to proposals for private defences and also accepts previous uneconomic pinning of the system (East Lane). As the SMP is non-statutory it could easily be ignored by planning authorities if people want to pin parts of the coast because they are prepared to pay for it themselves. This structure and approach is therefore likely to undermine the strategic objectives for the coast as a whole.	Can the project team please clarify whether the objective of the plan is to avoid creation of hardpoints and a swash-aligned shoreline or whether the plan is ambivalent about maintaining drift and interruption of processes?	Disagree. The SMP is quite clear on the impacts of defence in different areas. East Lane has in several strategies and appraisals shown to be economically viable, but not fundable and environmentally acceptable in terms of processes. East of England Plan says that development plans should have regard to SMP policies and, consequently SMP policies cannot be ignored. In fact, there is an indication that the planning process will have a greater regard to SMP	
A1p		3		BLY10	QRG	Roger Morris	Planning for the A12 needs to focus on adaptation and raising the roads above tide levels.		•			The technicalities of defending the A12 preclude improving defence in the long-term without some pretty hefty engineering. This and other locations suggest that the planning for the A12 needs to focus on adaptation and upon the need to raise roads above predicted tide levels - ideally on piles, or similar.	Can the team please give further consideration to the long-term strategy for key transport infrastructure in the face of sea level rise. Also state if the highway agency is in agreement.	The HTL policy refers to maintaining the function and position of the A12 as set out in the strategy. However the strategy considers this purely from an EA perspective. The SMP considers this from the national perspective. SCC has funds to either raise defences or provide defence by another means ( eg. a sluice). EA is to contribute local levy funds to complete the works.	3.61
A1q		3			QRG	Steve Jenkinson	BLY 10.1 funding is an issue. Consistency with the policy of HTL from the 3 epochs for unit BLY 9.3 with the Blyth Strategy.	•				I understand that the policy of HTL for the 3 epochs for unit BLY 9.3 is not entirely consistent with the Blyth Strategy, recognised apparently through the comment regarding technical feasibility and economic justification. Also BLY 10.1 where the likelihood of funding appears to be an issue.	Could the project team comment on what actions are to be included in the Action Plan to establish technical feasibility and economic viability? Presumably the SMP will draw on feedback and conclusions from the from the existing strategy development?	This policy was agreed with the representative members, including the EA. The issue will be included in the action plan.	
A1r					QRG	Roger Morris	Uncertainty in the sustainability of the policy and the issues associated with the A12 as a result of widening the Blyth mouth. What if the harbour can't be maintained due to economic/technical reasons.?			•		It is unclear if the policy of maintaining the harbour and mouth of the Blyth is driven by technical or political judgements? How does such a decision impact on the long-term sustainability? What if it is found that the mouth and Harbour cannot be maintained for technical and economic reasons, does this make the plan unsustainable?  It is not clear if coastal squeeze is the issue in the Blyth. There appears to be plenty of accommodation space upstream but in the lower reaches the constrained walls mean that ebb tides are particularly fierce and this in turn may lead to widening of the channel across remaining saltmarshes (if allowed to do so).  Widening the mouth of the Blyth at the moment might	Please explain how this action can be achieved in economic terms and consider the implications on the long-term sustainability if funding for upgrades of the Harbour is not found. In short can the team set out robustness of this position. Consider justification for coastal squeeze in the Blyth and revise if in agreement with this analysis. Could the team please comment on this scenario?	SMP complements EA Estuary Strategy. 1) Blyth Mouth: Holding the mouth is considered essential for maintaining sustainable defence to Southwold, the defence of Walberswick and the operation of the harbour. These are fundamental objectives defined for the area. Will review text ref comments to a commitment to retaining harbour structures for coast protection purpose. 2) No, it is not clear whether coastal squeeze is an issue. This is why the precautionary approach is being taken to policy development, allowing future widening along the harbour reach. 3) The policy for the mouth has been agreed by the CSG as HTL, but text clearly highlights that overall function. The text goes on to highlight that actual management of the structures may need to be realigned (narrowed or widened).	



A1s		3			QRG	Roger Morris	Environmental implications and solutions from sediment build up resulting from the new hard point.		•		Creating a new hard point at the northern end of Southwold appears to disrupt sediment supplies and to have knock-on impacts elsewhere. It is also noted that sediment build up as a consequence is likely to reduce cliff erosion upstream. This in turn must surely reduce sediment input that will have implications for sediment loads within the Blyth estuary. Also, this sediment build-up is likely to obscure the geological Site of Special Scientific Interest (SSSI), so a solution needs to be considered e.g. sediment by-pass. This appears to be discussed further on, but highlights the potential environmental seriousness of this issue.	Can the team please comment on this scenario particularly the potential wider environmental implications?	Evidence suggests that the existing linear flood defence has the potential to cause exactly this problem. The policy sets out to address this, but the precise manner in which this would be achieved goes beyond the level of the SMP. The concept of a hard point however demonstrates the basic principle of management over the length and width of shoreline. The environmental issues have been discussed with NE and conclusions drawn into the SEA and AA.	3.24.3.40
A2d	N	3		10	10.1	SCC	Guy McGregor/Jane Burch	The SMP should be allowing local land owners to carry out works where it will not have an affect on surrounding area.		•	Where local action could be undertaken without adverse consequence elsewhere, a Hold the Line policy would make more sense (with the proviso that national funding is unlikely) rather than one of No Active Intervention. For example, BLY 10.1 has a No Active Intervention policy, yet current activities by local landowners and the Blyth Estuary Group is effectively a Hold the Line policy - at least in the short to medium term. The policy should be amended accordingly.		In the case of this policy unit there is a clear statement from the EA that policy should be MR from their perspective. However support is being provided where local landowners wish to provided private investment in defences.	
A2ab	N	3		BLY10	10.1	SCC	Guy McGregor/Jane Burch	Loss of access around Blyth marshes needs to be clarified.	•		PDZ3: Loss of part of the network due to increased flooding around Dunwich river paths, Dingle Marshes, Corporation Marshes, Buss Creek and Tinkers Marsh which will need to addressed.		Local access has been considered and discussed in the SMP. There is a need to develop an action and management plan for the harbour area. This will be included in the action plan.	
A2am	N	3		SWD08		SCC	Guy McGregor/Jane Burch	Prehistoric finds at the northern end of zone	•		PDZ3: At the north end there have been substantial medieval and prehistoric finds.		The SMP is based on available information. The SEA will be reviewed and revised to take into account recently provided information from English Heritage.	
A5i	Y	3				EH	John Ette	Easton broad to dunwich cliffs - Greyfriars	•		p.PDZ3:6 "Greyfriars Monastery" ought to read "Greyfriars Priory" and it is the "Hospital of the Holy Trinity"			

## PDZ4

PDZ									Response						
Res.Ref	Accept SMP	PDZ	App	Management Area	Policy Unit	Organisation	Correspondence	Issues Raised	Clarify	Info.	Policy	Comment	Action Suggested	Comment/ Action in finalising SMP	Page No.
INDIVIDUALS															
i3	N	4					BE Ralph			•		Even at this stage, there seems inadequate joined-up consultation/thinking between EA; British Energy/EDF ; RSPB ; National Trust; land and property owners to establish the full breadth of the impact of anticipated coastal degradation.		Will be addressed in Action Plan.	
i4	N	4,5					G Smith			•		The coastline should be preserved as much as possible as it is in 2009. Strengthening the shore by fencing (Dunwich) and placing soft groins (Dunwich) has made a difference and the cost is minimal compared with hard defending. Also possible would be using old tyres. Forming or strengthening existing sand/shingle banks is effective too.		Noted. The SMP supports forms of low intervention defence. However any form of defence can result in reduction of drift and interference with coastal processes, which may then have a detrimental impact elsewhere.	
i25	Y	4					Charles Hughes			•		Overall, the scheme is a well thought-out proposal prepared by competent scientists and engineers, who have considered a wide variety of possible future events. With particular reference to PDZ4, have the Planners considered the effects of future sea-level rise in the Sizewell area. The new nuclear reactor will be required to operate until 2050+. Earlier replacement of Sizewell 'C' would be particularly expensive.		Noted. Yes, proposals will take account of potential impact of sea level rise.	
i27	Y	4					A J Francis					Agreed with policy.		Noted.	
i31	Y	4					Mrs Oliver			•		Interesting but rather complex. Financial consideration not on the display. Will the policy be implemented e.g. Money.		Noted.	
i38	Y	4, 5					Mrs J F Flick					Agreed with policy.		Noted.	
i51	N	4					Tony Bone			•		I am concerned that the possibility of permitting a breach of the river to the sea at Slaughden could be disastrous with unforeseen side effects which would change the economics of the River Alde at Aldeburgh. I think it essential that the shoreline south of Fort Green be stabilised on an ongoing basis.		These issues have been considered in the SMP and would be taken up through the estuary initiative. Action to be included in Action Plan.	
i56	Y	3, 4					Andrew Paige			•		I found the first review of SMP sub cell 2c to be comprehensive and in several areas authoritative. However, on a 50-year timescale, unless funds are made available in the region of £2 bn+ I do not think defences of Southwold or Aldeburgh are feasible as proposed and there are also long-term implications for the defence of present and future power stations at Sizewell.		Noted. Action to be included in Action Plan.	
i2	N	5					D R Barrick			•		Dredging should be stopped. According to this plan Sizewell will become an island which I feel is dangerous.		Sizewell will not become an island. Will clarify.	

GROUPS																
G1g	Y	4		ALB 14	14.4	SCAR	Graham Henderson	Concurs with what is stated in SMP	•			Slaughden -admitted in SMP2 draft as dependent on the estuarine policy		Noted.		
G7d	Y					Shingle Street Settlement Company		Plans for Sizewell should be more thorough and clear.	•			Sizewell 3 should be treated as a major development affecting the entire Suffolk coast, and not only its neighbourhood. Its safety is paramount to the welfare of the county. The business plan for the future development of the site should include provision for present and forward funding of coastal defences for the immediate and extended county coastline for a period well in excess of 100 years.		These issues have been considered in the SMP. Action to be included in Action Plan.		
AUTHORITIES																
A2ao	N	4				SCC	Guy McGregor/Jane Burch	Leiston Abby marshland has not been noted within the SMP		•		PDZ4: Leiston first abbey is noted but without also noting that the marshland immediately to its south is also of historic importance.		Noted. Will include comment in text as requested by English Heritage.		
A1j		3,4				QRG	Jim Hutchinson	Change in policy from HTL to NAI for Thorpeness	•			<p>PU 13.3, 14.1 and 14.2 [in the Thorpeness village area] all had an SMP1 and Strategy policy of HTL, and now the plan is concluding NAI over the 3 epochs, and this may raise some local questions. A similar conclusion is made on PU 16.4 at Hollesley Bay.</p> <p>Can the team please explain how they have come to this conclusion given the findings of the earlier plans and strategies?</p>		Will clarify, but generally due to increased pressure, resulting from climate change.		

## PDZ5

Res.Ref	Accept SMP	PDZ	App	Management Area	Policy Unit	Organisation	Correspondence	Issues Raised	Response			Comment	Action Suggested	Comment/ Action in finalising SMP	Page No.
									Clarify	Info.	Policy				
INDIVIDUALS															
i6	N	5					Barrie Skelcher			•		The minimum requirement is to "Hold the Line", we are already an overcrowded Island and it is not acceptable to loose more land. For this some joined up thinking is required and two strategies deployed. Shoreline erosion would be reduced, probably to manageable levels, if the impact of wave attack were reduced. This could be achieved by having Wave acive power generators sited off shore. These are currently only at the development stage but should be available within the next two decades. These will generate electricity by extracting power from the waves. This in turn reduces the effect of the waves on the shore line and so reduces erosion. The Rivers should be surge protected at their entrance. It is nonsense to try and protect the entire length of all the vulnerable rivers. This could be done by installing tidal flow generators coupled with suitable locking facilities for ships. With surge protection it is only necessary to delay the peak at the entrance to smooth out the effect inside the river. Both these solutions are engineering possible. It only requires the political will to finance them.		Any form of defence can result in reduction of drift and interference with coastal processes, which may then have a detrimental impact elsewhere. The SMP has to consider this together with the important aspects of the natural environment which has been highlighted as an essential value to the economy as well as having an inherent value.	
i8	N	5					Lindsay Clubb			•		There appears to be fundamental flaw in the manner in which the future of our coasts and estuaries is planned. Either proper estuary plans should be organised to be in place before an SMP is produced (so that it can take account of all the relevant issues) or, in their absence, an SMP should be tasked with itself identifying all the relevant issues necessary to properly determine the policies for the shoreline, no matter how remote from the shoreline the origin of some of the issues may turn out to be. To propose a policy which could have a significant impact on a population living a considerable distance behind a shoreline without first having fully understood the nature of that impact seems slipshod in the extrem (positively 'out of character' with the remainder of the SM). To then entrust or commit the review of that policy to a process (the ICZM), admitted by all and sundry to be experimental (i.e it may not happen), seems to me to be neither tenable or responsible.		Point noted, however the issues surrounding the estuaries are recognised to go well beyond the remit of the SMP. The SMP makes strong recommendations so that initiatives relating to the estuary have a good evidence base relating to the coast. Action included in Action Plan.	
i14	N	5,6					Richard Mann			•		I think an HTL approach should be adopted both north and south of Aldeburgh. It is critical that there is no breach at Slaughden in the future. Once sea defences are breached habitat behind goes from fresh to salt so all biodiversity is lost.		Noted.	
i32	Y	5					Peter Bell					Agreed with Policy.		Noted.	
i35	Y	5					Dr Anne Walton			•		Helpful and reassuring		Noted.	
i57	Y						S J L Oliver			•		The proposal for my area (Aldeburgh) is good in principle. BUT: I would need an assurance that local or central government support, practical and financially, is given such that the SMP can be implemented.		Noted.	
i58	Y	5					Ian Tait			•		Not clear what the proposed policy is. The SMP offers a series of possible actions but does not indicate how the conflicting interests can be lead to an agreed plan.		Some of these decisions will be addressed through the estuaries initiative. Action included in Action Plan.	
i59	Y	5		Orf 15			Charles Thompson			•		The plan seeks to address the risks of (in my area) flooding. The issue is only will the policy increase flood risk (result - neutral); the issue MUST BE how to REDUCE flooding risk. This is not mentioned in the plan, but most certainly should be.		We will see whether further clarification can be added with respect to flood risk in specific area.	
i64	Y	5, 6					Mrs Liz Mark			•		The opening of the shingle bank near Aldeburgh Martello Tower will be a very silly thing to do!! (I was about for 1953 floods and so know how parts of the town were affected with water twice a day up and down their staircases for 6 weeks until the sandbag wall was built from commencement of river wall round Slaughden Road, Park Road right round to near Saxmundham Road and the 9 breaches in wall were repaired & water on marshes pumped out & also we got back the sewage system". Aldeburgh people will not want that again I am sure - national servicemen; airmen from both twin bases and volunteers built this bag wall. In 2007 river wall nearly gave way due to surge (very lucky!). *Electric sub-station; gasometer; waterworks and sewage works were all flooded and took a long while to have services restored.		These issues would need to be considered in the event of a permanent breach.	
GROUPS															
G1h	Y	4				SCAR	Graham Henderson	Concurs with what is stated in SMP		•		Alde and Ore: Completion should be awaited of the current ICZM and ACES projects		Action included in Action Plan.	
G2g	N	5		ALB14	14.4	Suffolk Coast and Heaths	Nick Collinson	SMP should clarify where the breach at Slaughden may be engineered.		•		If the technical advice is that a breach is required somewhere on the Alde/Ore, although it is likely NOT to be at Slaughden, then the SMP should be more transparent about this, rather than being silent and leaving ACES to go public with the issue.		This point has been made in the SMP that any breach at this location needs to be managed and will need to address issues within the estuary.	
G3c	N					Alde and Ore Association	David Andren			•		When the Environment Agency first proposed the development of an Estuary Development Plan for the Alde and Ore in 1993 our Association argued that, because of the particular configuration of our coast, it was important to look at the management strategy for the coast as well as the estuary itself. This led to agreement that consultants (Halcrow) should prepare a separate study known as the Thorpeness to Hollesley Strategy described to us as "a mini-SMP" which would be more detailed than was normally the case with SMPs. With the support of the Alde and Ore Association the Environment Agency re-launched the Estuary Management Strategy earlier this year name under the new title "Aldeburgh and Coast Estuary Strategy" (ACES) and decided that Halcrow, rather than Black & Veatch, should be the lead consultants for this study.		The SMP has taken evidence from the strategy identified in the response. This has been the basis for the SMP recommendations.	
G3d	N					Alde and Ore Association	David Andren	Incorporation of estuary reports into the SMP.		•		At no point in the draft SMP dealing with our part of the coast and the Alde and Ore Estuary do Royal Haskoning specifically refer to ACES or the very detailed specification for this study prepared by the Environment Agency. Given that the specification prepared by Royal Haskoning for the Essex Coast, published in August 2009, covers both the Essex coast and estuaries we find this astonishing. We think it is nonsensical to try to prejudge decisions on the coast until the more detailed studies which Halcrow are now preparing are available. We have noted that other estuary groups and SCAR hold the same view.		The SMP has taken evidence from the strategy identified in the response. This has been the basis for the SMP recommendations. The SMP also recognises that its recommendations are fed into the emerging ICZM initiative. Action included in Action Plan.	

G3e	N					Alde and Ore Association	David Andren	SMP can not reach agreed policy until the outcomes of the ACES and Alde Ore Futures studies have been completed.		•		The SMP frequently refers to the “estuary strategy” for the Alde and Ore rivers. While the SMP recognises that nothing can be agreed until the “estuary strategy” is available, it never the less proposes a preferred option of doing nothing south of Slaughden Martello Tower. We consider such a conclusion, however provisional, cannot be sustained or justified verified until the ACES and Alde and Ore Futures studies have been completed. We also believe the assumptions made about the likely impact of the breach need to be informed by knowledge of the strength of water flows within the estuary as well as along the coast. The SMP should not therefore make any recommendations for change however provisional.		The SMP has taken evidence from the strategy identified in the response. This has been the basis for the SMP recommendations. The SMP also recognises that its recommendations are fed into the emerging ICZM initiative. We will seek to clarify this position with respect to existing modelling. Action included in Action Plan.	
G3f	N					Alde and Ore Association	David Andren	The SMP should also recognise that Aldeburgh is at risk from coastal inundation via the estuary.		•		The SMP focuses on the shore and ignores the fact that the major threat to the town of Aldeburgh is not just the incursion from the sea: it is also the incursion of the sea via the river over the river wall which runs due west from Slaughden, as happened in 1953. The calculations on costs also appear to have overlooked the need to maintain or strengthen this river wall if there is a breach in the coastal defences at or near Slaughden.		Noted. The issue is discussed in the SMP. Action included in Action Plan.	
G3g	N					Alde and Ore Association	David Andren	Estimation of properties and values at risk are underestimated within the SMP	•			The Alde and Ore Association and the Environment Agency have agreed the basis on which over 1,750 properties at risk of flooding should be valued and we now have estimated values for 90 per cent of those properties. These values, excluding major hotels, publicly owned community assets, farms and agricultural land amount to some £500 million. The number of properties in the SMP said to be at risk of flooding and their value are grossly understated in the Report. We therefore consider it is unacceptable to endorse any of the conclusions in the SMP based on this earlier data.		We will seek further information from the EA. Action included in Action Plan.	
G3h	N					Alde and Ore Association	David Andren	Defences south of Aldeburgh need to be considered.	•			As we have stated in previous submissions to the Environment Agency we believe that there is a case for improving sea defences south of Aldeburgh. In particular we think it is necessary to look at the case for increasing the height and looking at possibilities other than shingle recharge for protecting the relatively short section of the coast running from south of the Martello Tower up to the point at which the height of the shingle ridge begins to rise further south		Noted.	
G3i	N					Alde and Ore Association	David Andren	A detailed crest level of defences was recently carried out, and needs to be considered in SMP.	•			The Environment Agency has very recently undertaken a detailed crest level survey of the heights of our sea and river defences. We understand this will shortly be available to the Association and others. Since we have not yet seen this survey we assume that it cannot have been taken into account by the consultants when drafting SMP2. We consider this indefensible and that engineering consultants need to be employed to assess its implications.		Not relevant at the level of the SMP.	
G3j	N					Alde and Ore Association	David Andren	Breaching of the estuary will have considerable impacts on fresh water supplies and not just agricultural land.	•			The authors of the Report appear to be unaware that the estuary area includes not just agricultural land but that that land is now a major vegetable producing area of the UK. It relies on the clean aquifers for irrigation. Breaching these river defences would allow these water sources to become brackish and subject to saline intrusion. As a result the UK would lose a significant resource to the detriment of its food supplies and work to reduce food transport to assist reducing the trend towards global warming.		These issues have been highlighted in the SMP document on page PDZ5:16.	
G3k	N					Alde and Ore Association	David Andren	The SMP overlooks the recreational and economic benefit of the Alde/Ore south of Aldeburgh	•			It is not clear from the draft Report that the authors appreciate the fact that there are many miles of river which can be used safely by small sailing and other boats which make a major contribution to the area's economy. Without that safe sailing, which would largely go if a breach occurred, the economic loss would be high as most of the sailing would cease. This points again to the need for a full evaluation of the coast, the estuary and the area as it is a major contributor to the area's economic well being. This could usefully take as its starting point the 2003 economic survey of the Alde and Ore Estuary and the surrounding land area sponsored by the Alde and Ore Association, the East of England Development Agency, Suffolk Coastal District Council, the Suffolk Coast and Heaths Unit and others.		These issues have been highlighted in the SMP document on page PDZ5:16.	
G3l	N					Alde and Ore Association	David Andren	An improved assessment to identify flood risk is required.	•			Further work is also need to quantify the population numbers at risk of flooding. The Association considers that trying to base figures on just permanent residents is unacceptable and that the estimates which are being used for the SMP, ACES and Alde and Ore futures are too low. Over the last 30 years the towns (including Thorpeness) and countryside surrounding the Alde and Ore Estuary have attracted huge numbers of people with second homes and led to a large increase in the number of rental properties. In Aldeburgh, for example, the permanent population is thought to be about 2,000 but in summer months this can be as high as 7,000. In the case of second home owners there are people who may live most of the week in Suffolk but who have other homes, e.g. in London, which are formally declared for various reasons as their “main residence”.		Noted. Information passed on to EA.	
G3p	N					Alde and Ore Association	David Andren	SMP does not recognise historic artefacts at risk.	•			Although the SMP does recognise the existence of many historic artefacts in the area, including the Orford Ness Lighthouse, we consider a much more detailed study of their importance, e.g. those constructed on Orford Ness during the Second World War, is needed. Another area at risk of flooding is Snape Maltings – an asset of enormous cultural, educational and historical significance which is of great importance nationally and to the local economy. Large amounts of public, e.g. from the Arts Council, and private finance have been contributed towards its development. This can now only be carried out as part of the ACES and Alde and Ore Futures studies.		The SMP makes reference to the lighthouse within the issues and objectives table and within PDZ 5.	
G4	Y	5		ALB14	14.3, 14.4	Aldeburgh Yacht Club	Michael Hayes	Concerned over a breach at Sudbourne Bay		•		Changing policy from that of holding the line without taking account of the estuary is not justifiable. It could only be done if a full evaluation of the estuary, the shoreline and its neighbouring sections were undertaken and that full evaluation found it to be the only option, because of the river side and sea side of the shoreline are inextricably linked.		This is the approach being taken by the SMP. Action in Action Plan.	
AUTHORITIES															
A1d		5,6				QRG	Roger Morris	The formation of the Alde/Ore Estuary	•			I would disagree with the statement that the Alde-Ore is the only bar-built estuary in the UK with an extending bar - Pagham Harbour is currently extremely active, albeit of smaller extent.	To note and correct if agreed with.	Noted. Will check and amend if necessary.	

A2k	Y					SCC	Guy McGregor/Jane Burch	SCC welcome the integration between the SMP and Alde/Ore estuary plan		•		The County Council welcomes the integrated approach being taken on the Alde/Ore in trying to assess the impacts of the SMP, estuary plans and wider community planning as a whole. The SMP recognises that a breach is likely somewhere on the Alde/Ore, and a community based decision to this is preferable to one being dictated by the SMP. It is imperative that nothing is written in the SMP that cannot be amended in the light of this community work and the Aldeburgh Coast and Estuaries Strategy (ACES).		Other initiatives are recognised within the SMP. The SMP clearly states that before coastal policy is implemented, integrated planning needs to be taken into account. Action in Action Plan.	
A2u	N					SCC	Guy McGregor/Jane Burch	Concerns over loss of freshwater sources.		•		Saline intrusion of underground water sources is of serious concern as this could negatively impact on the ability to irrigate of high-value crops in the coastal strip. The accessibility of alternative sources and impacts of losing the existing ones needs to be factored into the assessment of the SMP.		Noted and is already highlighted in SMP.	
A2ad	N	5		ALB14		SCC	Guy McGregor/Jane Burch	Potential loss of Aldeburgh access routes		•		PDZ5: Potential loss of access to Alde and Ore Estuary routes and paths around Sudbourne Marshes, due to increased flooding. Realignment of beach route at Thorpeness maybe required.		Noted. Will forward information to the Estuary Partnership.	
A2ap	N	5		ALB14	14.4	SCC	Guy McGregor/Jane Burch	Concerns over the loss of beach material protecting Slaughden Martello Tower. Lack of consideration for historical finds on Orford Ness.		•		PDZ5: The importance of Slaughden Martello tower as a unique structure is recognised and if a breach is engineered it will be placed to protect this feature; presumably a natural breach might not be so well placed. This issue, and the impact of a breach on the estuarine sites and landscapes, needs further consideration. There appears to be no heritage assessment for the remainder of Orford Ness, despite the historic significance of the 20th century installations here.		It is agreed that further detailed work is required prior to change in this area. Action in Action Plan.	

## PDZ6

Res.Ref	Accept SMP	PDZ	App	Management Area	Policy Unit	Organisation	Correspondence	Issues Raised	Response				Action Suggested	Comment/ Action in finalising SMP	Page No.
									Clarify	Info.	Policy	Comment			
INDIVIDUALS															
i12	N	6					Tim Green				<ul style="list-style-type: none"><li></li></ul>	No. I agree with the policy objectives to protect and maintain Shingle Street through management of the complex natural system, however, I fundamentally disagree that the 2025 Policy for Shingle Street should be Managed Retreat. The policy here should continue to be "Hold the Line" as recommended for the 2055 and 2105 periods. The important distinction should be that the line to be held should be in front of the village. This should provide a last point of action to protect the village and the whole outlying area and yet enable adaptable management up to this point. This is vital for those families who live in Shingle Street, who have bought property on the back of the previous SMP policy and have invested all they have in building and maintaining their homes and families in this village. The uncertainty and worry that this proposed new SMP policy presents these families is significant and is highly distressing. The published material talking of the possible loss of the village within our lifetimes brings the full consequences of the need for a very strong SMP and subsequent maintenance action vividly to life.		The SMP has a duty to highlight increased risk. The policy of managed realignment reflects the point being made that there needs to be adaptable management in order to sustain the village. Action in Action Plan.	
i13	N	6					Juliet Redding				<ul style="list-style-type: none"><li></li></ul>	See above comment		The SMP has a duty to highlight increased risk. The policy of managed realignment reflects the point being made that there needs to be adaptable management in order to sustain the village. Action in Action Plan.	
i16	N						Michael Laschet				<ul style="list-style-type: none"><li></li></ul>	Firstly, only the first two lines of 'Land and Property' make a clear and unambiguous statement. Secondly, there is no explanation of the 'constraints' provide by the SMP for the Deben estuary. The estuary strategy is not explained. Thirdly, in 'Nature Conservation', how is it possible to allow cliff erosion while maintaining cliff-top habitats? What 'balance' does the plan try to address? Fourthly, what is meant by 'basic' control of man-made and natural features? – and the 'potential of low-lying areas'? Re 'Implications for Landscape' how can the landscape character of the area be maintained if the policy is managed retreat or surrender to the sea? The phrase 'resisting further encroachment of defence' is particularly unfortunate. It's the encroachment of the sea which is at issue. Re 'Holding the Line' it seems unlikely that piecemeal defence of selected areas is a policy that will succeed in view of the power of coastal waters attacking from two or more sides. Re 'Implications of the Historic Environment', I claim that it is not possible to assess the plan as it is written and give a verdict/opinion until the Action Plan is published.		Noted. We will clarify the text in relation to these issues.	
i48	Y	5, 6					Simon Read				<ul style="list-style-type: none"><li></li></ul>	There are some unknowns in the SMP, one major one is the implications of a breach at Slaughden. This would alter predictions for sediment etc in that zone, also affect the behaviour of the shingle spit at East Lane. The Slaughden question appears to be bringing on a certainty, it is a matter of when and how this is managed.		Noted. Action to monitor in Action Plan.	
GROUPS															
G2p	N					Suffolk Coast and Heaths	Nick Collinson	Areas of SMP have not been fully considered, i.e., Deben estuary (upper) and upper Kessingland levels.	<ul style="list-style-type: none"><li></li></ul>			Consequential upstream effects are not fully thought-through. E.g. Deben estuary (above). Also the SMP area at Kessingland only covers a fraction of the Levels. What is the plan for the upper Levels and what are the implications on the upper levels of the SMP policies? Freshwater is currently pumped from the Levels, are the upper reaches potential compensatory freshwater habitat?		We will clarify the SMP position on this.	
G7g	Y					Shingle Street Settlement Company		Further clarification required for adaptation of shingle street,	<ul style="list-style-type: none"><li></li></ul>			We welcome and agree with the general objective of maintaining "the semi-natural and unique quality and community of Shingle Street" and of the surrounding agricultural value of the area, in a sustainable manner. We are unclear what "adaptation" is envisaged and would welcome further discussion of this.		Noted. We will seek to clarify our position.	
G7h	N					Shingle Street Settlement Company		Agreement of estuary strategy before SMP conclusions are made.	<ul style="list-style-type: none"><li></li></ul>			Before any conclusions are reached for any part of the Alde and Ore area, including Shingle Street, we recommend awaiting completion of the work on the Estuary: ie the current Alde and Ore Futures, or Integrated Coastal Zone, Project. We believe, in general, that Shoreline Management planning should not be divorced from possibly inter-related estuarine strategies and management, and that this is especially appropriate in Suffolk.		Fully support this approach,	
G7i	Y					Shingle Street Settlement Company		The Government/EA should be considering funding for protection of the mouth of the Alde/Ore.	<ul style="list-style-type: none"><li></li></ul>			In particular, lying at the mouth of the Alde and Ore Rivers as it does, the Shingle Street environment is affected by both the river's) and the sea. The Shoreline Management Plan should offer the chance for both the Government and the Environment Agency wholeheartedly to commit themselves to ensuring the future of Shingle Street properties, historic environment and ANOB.		This lies outside the remit of the SMP.	
G7j	Y					Shingle Street Settlement Company		Concerns over current flood warning system.	<ul style="list-style-type: none"><li></li></ul>			We note the intention to continue to ensure warnings for Shingle Street residents of likely flooding, but would observe that the current system of flood warning is patchy, inconsistent, and alarmist in tone and advice, creating worry and confusion rather than action.		Noted. This comment will be passed on to the EA.	
G7k	Y					Shingle Street Settlement Company		Require maintenance and support for MR policy.	<ul style="list-style-type: none"><li></li></ul>			We desire, support and recommend prompt and continuous attention to the maintenance and increase of defences to Shingle Street. We expect and wish to see a commitment in the Plan to positive action, should tidal flows into and out of the estuary be increased ("managed realignment"); or should the need arise to "manage periodic loss of width to the beach" ("Hold the Line".)		The policies will be taken forward in the Action Plan.	

G7l	Y					Shingle Street Settlement Company		Interested in joined up discussions with Dutch approach.		•		We would be interested to join in any discussion of techniques for strengthening the shingle, especially in front of the houses, such as those which seem to have been used successfully in the Netherlands		Noted. This will be put into the Action Plan.	
G8a	Y					Bawdsey PC	Louise Lennard	Broadly in Agreement with SMP		•		Bawdsey Parish Council is broadly in agreement with the SMP2, particularly as it relates to the Bawdsey Coastline. However, there are still a few issues we are concerned about which are made below.		Noted.	
G8b	Y					Bawdsey PC	Louise Lennard	Concerns over finalising SMP before Alde Ore strategy is complete	•			The Council has concerns about finalising SMP2 before the conclusion and agreement of the Alde and Ore Estuary Study and the A and O Futures study. The link between these studies and SMP2 is particularly important in the case of Shingle Street where the effect of a breach at Slaughden, whether natural or man-made, on the protection provided by the river to the north end of Shingle Street is, in our view, underplayed. It should also be noted that the breakdown of river defences behind Shingle Street near the river mouth presents a possibly greater risk to the community than flooding from the sea.		Noted. Comments to be passed on to EA. Action to be included in Action Plan.	
G8c	Y					Bawdsey PC	Louise Lennard	Require clarification for MR at shingle street in first epoch.	•			The Council understands that during the first epoch the intent of the proposed policy of 'managed realignment' is to respond to any changed conditions in the river mouth in order to maintain 'the semi natural and unique quality and community of Shingle Street' as stated in the SMP2 objectives. The workings of this realignment policy should be made clearer. We do not think that this intention is presented strongly enough and that it should be emphasized in the policy summary		We will clarify the SMP position on this.	
G8e	Y					Bawdsey PC	Louise Lennard	Require more details about proposed defences at Shingle Street.	•			The Council would welcome more details about the possible defences which may be put in place at Shingle Street. What are 'breastworks'? Several experiments are in hand for protection of shingle beaches both in Suffolk and Holland which are sympathetic to the environment.		We will clarify the SMP position on this.	
G8f	Y					Bawdsey PC	Louise Lennard	Welcome the policies for Shingle street, East Lane and Deben Estuary.		•		Bawdsey Parish Council welcomes the designations of Hold the Line at East Lane and at Shingle Street for epochs 2 and 3 and effectively Holding the Entrance to the River Deben		Noted.	
G8h	Y					Bawdsey PC	Louise Lennard	SMP does not emphasise the importance of agricultural land.	•			The Council believes the document does not adequately stress the value of the agricultural land in this coastal area. The farms along the coastline are now significant producers of potatoes and salad crops. With food shortages likely to accompany global warming and continued population growth, this land could become extremely valuable to the country and yet it is usually dismissed as mere agricultural land.		Noted.	
<b>AUTHORITIES</b>															
A1ad		6	HOL 17			QRG	Roger Morris	Disagreement that hold the line for East Lane is minor positive		•		Considering the overall policy to be neutral because it continues the status quo, and creating stability elsewhere as minor positive seems to be inappropriate given that the underpinning principles of SMP should rely on the way the system as a whole wants to develop rather than trying to hold the line where the economics don't appear to stack up.	Can the team please give further consideration to this issue and set out implications on long term sustainability?	Sustainability is considered in Appendix B and the principles for development of the plan set out and agreed by all parties. These are in line with the procedural guidance for SMP2. The local issue is under review. This question was discussed in detail with the RMF.	52-54
A1ai		6	HOL 17			QRG	Roger Morris	How will the policy will deal with environmental and economic concerns, if the policy is to pin the mouth?		•		How will the completion of the estuary strategy for the Deben resolve adverse affects on the Natura site? If the SMP policy is to pin the mouth then there will be a problem with realignments upstream and in turn this will mean that the estuary strategy is unlikely to be able to reconcile economic and environmental concerns - on the economic front the case is not there for defence of several cells; whilst on the environmental front there is a need for realignment. Yet, if the mouth is pinned the only strategy possible from a morphological viewpoint will be "hold the line".	Can the team please explain how this will resolve the problems I detailed in the plan?	No, disagree. There is still significant scope for realignment in the estuary and for adaptive approach to where defences are held. Additional explanation to be added on the approach to the treatment and assessment of Estuaries. SMP policy does not prevent estuary strategy proposing other policies. Strategy can disagree with SMP policy which says that it is necessary to hold estuary to manage coastline issues. SMP is realistic in that it acknowledges that there are ways in which the upper part of the estuary can be managed to deliver/deal with estuary issues. SMP is not imposing unrealistic policies on estuary strategy.	53-54
A1ax		6				QRG	Roger Morris	Holding the line at East Lane is not economically sustainable.	•			Is it correct to state that the economics of holding East Lane are demonstrated by the private defences already there? My understanding is that these works were funded by the sale of land for housing and previous reports had shown there was no economic justification for Government funding. Assuming that ultimately the national purse may be called upon in future shouldn't the policy be to make clear that such defences will not be maintained in the face of foreshore steepening? Holding this point will cost considerably more as foreshore profiles steepen and these in turn may affect onward sediment transport. This has the makings of a deflection point that would send sediment offshore. Or is there a long-term agreement with the defence owners to continue to pay for future maintenance?	Can the team please revisit and explain the decision in economic terms and clarify what agreements are in place to support future defence costs?	1) Economics: It has been repeatedly shown that holding East Lane is economically justified, just not fundable. The point being made in the SMP is that from a local or regional perspective defence of this area is not only justified, but has support of the local community. The East Lane Trust is in a position to provide additional funds for future maintenance and improvement. Refer to the caveats ref need for private funding. 2) Monitoring programme is in place to confirm that there is no foreshore steepening. Present 20 year period of monitoring shows no steepening. Action in Action Plan to continue monitoring with respect to Natura 2000 site. 3) There is no evidence to suggest that sediment would be deflected offshore at this point in such a manner that it is lost to the coastal system.	22, 29



A2j	N	6		DEB 17	17.3/17.4	SCC	Guy McGregor/Jane Burch	Policies for mouth of Deben will put pressure on upcoming estuary strategy			•	The Hold the Line policies in the mouth of the Deben (DEB 17.3/17.4), and the resultant loss of salt marsh through coastal squeeze, will put a lot of pressure on the forthcoming estuary strategy for realignment higher up the estuary. This effectively predetermines what the estuary strategy will need to say - which goes against the current landowner based approach being encouraged by all parties involved in the Integrated Coastal Zone Management Project. Conversely, the estuary plan may drastically affect tidal flow and thus the ability to implement a Hold the Line policy at the mouth, thus the two must to be considered as a whole.		Holding the line at the mouth of the Deben is essential in meeting the objectives agreed within the SMP. The policy here does impose constraints on the manner in which the estuary is managed. Primarily with a respect to flood compartment within the lower estuary. Regardless of this policy information taken from the initial estuary strategy indicated a need for realignment in the upper estuary. The SMP is identifying the advantage of such an approach so that values in the coastal zone may be sustained.	
A2ae	N	6		HOL16 & 17		SCC	Guy McGregor/Jane Burch	Potential loss of Hollesley Bay and Deben access routes			•	PDZ6: Potential loss of rights of way network around Hollesley Bay and Deben estuary. Currently there is limited access at Bawdesy due to ongoing erosion issues which will worsen over time.		Noted. Action in Action Plan.	

										Response						
Res.Ref	Accept SMP	PDZ	App	Management Area	Policy Unit	Organisation	Correspondence	Issues Raised	Clarify	Info.	Policy	Comment	Action Suggested	Comment/ Action in finalising SMP	Page No.	
INDIVIDUALS																
i21	Y	6, 7					Felixstowe Town Council			•		The Town council welcomes the SMP process which is an essential tool for coastal management.		Noted		
i36	Y	7					Anon					Agreed with policy.		Noted.		
i37	Y	7					Unknown					Agreed with policy.		Noted.		
i39	Y	7					Robert Dix			•		Process appears to be well handled, although seeking funding from national fund sounds uncertain.		Noted.		
i47	Y	6, 7					Peter Robinson				•	Eg1 - the 3 attempts to repair the footpath by the golf course are all hopeless. One was too small and too deep, another was to large and angular and the third too large. All 3 were dangerous to many types of users as any simple risk assessment would illustrate. This is money wasted. Please alert the Audit Commission to respond to myself. Eg2 - If public money is being spent on sea defences, the public should have a right of access over them. (See Parliamentary Bill.) What are you doing to negotiate access over the South End defences and those north of Cobbolds Point? Eg3 - The plethora of signs attached to the sea wall towards Landguard are an eyesore. If kids had spray-canned it, there would be an uproar. Remove all but one at each end and change the law! Eg4 – Why has it left the beach north of Cobbolds Point inaccessible except at low tide - why do we still have this gap in		These actions will be addressed at detailed scheme level.		
i49	Y						Mr K F Tricker			•		Section Brackenbury Cliff to Cobbold's Point. To extend the promenade eastward round the point is an excellent, if expensive, proposal. But to stop at Jacob's Ladder is silly: the retaining wall on the remaining section to Brackenbury is only 200 yards but is in very poor state and is exposed. If not done at the time of the proposed works, it will have to be done properly soon after to avoid scour and collapse of the cliff at the bottom of the Golf Rd properties.		Noted. This will be considered at scheme level.		
i60	Y	6, 7					Paul Marsh			•		Agree with the policy but would like to see work on fishtail groynes advanced to say 5 - 10 years time (ie to allow time to see effect of now proposed revetment wall). Also the report focuses a little too much on the blue flag south beach as the principal tourist amenity for Felixstowe - in fact the beaches from the Spa Pavilion to Cobbold's point are far more popular with families and it is vital that proper		These issues are being addressed through the scheme appraisal.		
i62	Y	7					Jean Potter (Waldringfield PC)			•		We are solely concerned with the area from Bawdsey to Felixstowe. We reluctantly support the "hold the line" policy. We cannot comment on the are upriver (Deben) at Waldringfield as this is not shown on the plan.		Noted.		
i63	Y	6, 7					Geoff Christian (Kirton & Falkenha)			•		The SMP was generally accepted by the Committee. However it was commented on that a Plan incorporating Estuaries and Shoreline would be an improvement. It was also noted that no study was made of the effect of the Orwell Estuary on the adjacent Felixstowe Shoreline.		Noted,		
GROUPS																
G7e	Y					Shingle Street Settlement Company		More co-operation and contribution to coastal and flood risk from Felxstowe Docks and EU.		•		The importance of Felixstowe Docks to Europe, the UK and East Anglia is incontrovertible, and their protection from sea and river flooding is vital. In return, their owners should be required to contribute to the sea and river defences for Felixstowe and Harwich, and the adjoining Essex and Suffolk coastline areas.		Noted		

