

B7 Consultation Report

Consultation with stakeholders (i.e. Client Steering Group, Elected Members, Key Stakeholders and other stakeholders) has occurred throughout the development of the Medway Estuary and Swale Shoreline Management Plan (SMP). Stakeholder membership lists and the full programme of stakeholder engagement can be found in **Sections B1** and **B2** of this present Appendix.

This Consultation Report describes the public consultation process, undertaken to inform the public of the SMP and to give the public an opportunity to comment on the SMP policies. **Section B7.1** describes the public consultation methodology employed and **Section B7.2** details the comments received and the Client Steering Group response to these comments.

Public Consultation took place between the 14th May 2007 and the 7th September 2007.

B7.1 PUBLIC CONSULTATION METHODOLOGY

The public consultation methodology was agreed at the sixth Client Steering Group Meeting (CSG6) held on 28th February 2007 in Canterbury. After discussing the various approaches that could be adopted at each stage, the Client Steering Group (CSG) agreed the appropriate consultation approach and agreed dates. The CSG agreed the format and content of all consultation materials.

Approaches adopted are discussed below and include:

- the use of the South East Coastal Group website;
- PowerPoint presentations;
- press notices;
- press briefings;
- letters to the extended stakeholder group;
- briefing packs;
- summary leaflets;
- posters;
- hard copies of the SMP documents;
- CD-ROMs of the SMP documents;
- consultation response forms; and,
- public and stakeholder meetings.

At the outset of the consultation, the CSG agreed that the following items/activities were not required to be undertaken:

- letter drops to individual households (expensive and unnecessary if other methods are employed);
- a central hot line for stakeholders to call (resource intensive);
- static display boards in local libraries or local authority offices (use of a PowerPoint presentation would be more cost effective); and,

- pre-arranged public meetings (decision on public meetings to be taken once consultation is underway to gauge where and when they would be most useful i.e. with those communities / individuals most affected).

B7.1.1 Websites

A page on the website of the South East Coastal Group Website (<http://www.se-coastalgroup.org.uk/>) was devoted to the public consultation of both the Medway Estuary and Swale Shoreline Management Plan (SMP) and the Isle of Grain to South Foreland SMP2. Canterbury City Council (CCC) acted as administrators for this. The full consultation document, including all appendices and maps, was available in electronic format on the website. Halcrow produced a consultation response form which was available to download or complete online. The CSG agreed that the consultation form should be similar to that used in previous SMPs with sections for name, contact details etc. A copy of the consultation response form is included in **Annex B1**.

A webpage was also set up on the Tonbridge and Malling Borough Council website (<http://www.tmbc.gov.uk>) to explain the Medway Estuary and Swale Shoreline Management Plan and public consultation. In addition, each Local Authority website included reference to the SMP public consultation and a link to the South East Coastal Group website.

B7.1.2 PowerPoint Presentation for Public Meetings/ Displays

A PowerPoint presentation was produced electronically by Halcrow for the Medway Estuary and Swale SMP and circulated to the CSG. The presentation had two parts:

(i) A standard introduction to explain the purpose of/ need for SMPs, SMP background, what the policies mean, and the problems that could occur to our coasts over 100 years under existing policies such as hold the line.

(ii) A second section that could be run separately and which explained the policies for each management unit consecutively. This second section highlighted the policy, key drivers for the policy and key impacts. For exhibitions, local officers edited the second part of the presentation to focus on relevant areas. The second section was run automatically in lieu of display boards.

B7.1.3 Press Notices / Press Briefings

The Environment Agency and Canterbury City Council were responsible for drafting and placing the press notices in local newspapers and council magazines. A copy of a press notice is included in **Annex B1**. County/ National press briefings were organised by the Lead Authority and Kent County Council. Local press briefings were also organised by the Maritime Authorities and the Environment Agency.

Articles explaining the SMP and consultation appeared in the August / September 2007 edition of the Tonbridge and Malling Borough Council newspaper 'Here and Now', which was issued to all residents in the Borough and the summer 2007 edition of the Swale Borough Council publication 'Inside Swale'. The Tonbridge and Malling Borough Council article can be viewed at:

http://www.tmbc.gov.uk/assets/HereAndNow/aug07/pp_5.pdf

B7.1.4 Letters to the Extended Stakeholder Group

A standard letter was drafted by Halcrow and sent out to the stakeholders group (350 stakeholders), along with consultation response forms, to promote the shoreline management plans, highlight the start of consultation, deliver consultation information and invite affected parties to prompt meetings. A copy of the stakeholder letter is included in **Annex B1**.

A letter was sent out to all the Parish councils with a Medway frontage, between Medway Bridge and Allington Lock, informing them of the consultation and issuing them with consultation leaflets.

B7.1.5 Briefing Packs

Briefing packs were produced for the press and for Local Authorities. Copies of each are included in Annex B1.

Press Briefing Pack

Two levels of press briefing pack were produced and issued to the CSG, who circulated the material to the Local Authority Teams and Environment Agency Project Teams responsible for each SMP. One level was focussed at the county press, while the other was focussed at the local press. Each briefing pack had three parts:

- (i) an introduction to explain the background of climate change, sea level rise and coastal change, the purpose of SMPs and the problems that could occur along our coasts over the next 100 years under existing policies such as hold the line;
- (ii) a section that explains the policies proposed for each policy unit; and,
- (iii) a section that explains how to get involved, comment, on the SMP and where to access the full SMP public consultation material.

Local Authority Briefing Pack

Local Authority Briefing Packs had three parts:

- (i) an introduction to explain the background of climate change, sea level rise and coastal change, the purpose of SMPs, and the changes that could occur along our coasts over the next 100 years under existing policies such as hold the line;
- (ii) a section that explains the main contentious issues/ policies/ policy units; and,
- (iii) a section that explains the policies per policy unit.

B7.1.6 Summary leaflets

Two summary A3 folded leaflets were produced in colour to cover the Medway Estuary and Swale SMP and the Isle of Grain to South Foreland SMP2. These leaflets were checked by the Environment Agency communications team for Plain English compliance. The CSG and EMF reviewed and agreed the draft text before the leaflets were finalised. The CSG agreed that these summary leaflets should follow the format of the South Foreland to Beachy Head SMP. Rather than each leaflet dealing with exclusively open coast and estuary frontages, the leaflets were organised to reflect stakeholder interests and local authorities:

- Leaflet 1 – Medway Estuary and Swale, plus the northern coast of the Isle of Sheppey. This covered the Medway, Tonbridge and Malling and the Swale; and,
- Leaflet 2 – The entire open coast frontage from the Isle of Grain to South Foreland.

Approximately 1000 copies of each leaflet were distributed to each Local Authority and the Environment Agency. Leaflets were placed in Local Authority offices, Environment Agency offices and local libraries. Kent County Council sent leaflets to a number of stakeholders (which included members of the Kent Coastal Network and coastal local boards / neighbourhood forums), listed in **Annex B1**. Consultation leaflets were also mailed directly to affected residents along the Swale frontage and hand delivered to affected parties in Wouldham.

B7.1.7 Posters

A poster was drafted by Halcrow, agreed with the CSG and a read-only version made available on the South East Coastal Group website. These posters were made available for any party to post in suitable locations to engage with their peers and the public. A copy of the poster is included in Annex B1.

Laminated posters were put up in locations where managed realignment is recommended between the Medway Bridge and Allington Lock:

- Wouldham Marshes;
- Burham Marshes; and,
- West of Aylesford.

B7.1.7 Hard Copies of the Draft SMP Document

Printed versions of the consultation document and supporting appendices were available for inspection at the following locations:

- Medway District Council offices at Strood;
- Tonbridge and Malling Borough Council offices at West Malling;
- Swale Borough Council offices at Sittingbourne;
- Kent County Council offices at Maidstone; and,
- Environment Agency office in Addington.

B7.1.8 CD-ROMs of the Draft SMP Document

Copies of the consultation document and supporting appendices were also produced on CD-ROM and were available to view in a number of libraries, as well as the following Local Authority offices and Environment Agency offices:

- Medway District Council offices at Strood;
- Tonbridge and Malling Borough Council offices at West Malling;
- Swale Borough Council offices at Sittingbourne;
- Kent County Council offices at Maidstone; and,
- Environment Agency office in Addington.

B7.1.9 Public / Stakeholder Meetings

Focussed face to face meetings were proposed for affected parties only e.g. residents with properties affected, farmers with land affected, environmental, heritage and recreation interest groups. The CSG agreed that these meetings would only be undertaken if stakeholder response indicated that they were required. If deemed necessary, meetings would then be set up with those communities or individuals most affected.

In response to the publication of the draft plan and at the request of stakeholders, meetings were also organised with the National Farmer's Union (NFU) and the Royal Society for the Protection of Birds (RSPB). Meeting minutes from the NFU meeting in August 2007 are included in **Annex B1**.

| Date | Venue | Main area covered |
|----------------------------|--------------|--------------------------|
| 21 st June 2007 | NFU Swale | Swale |

| | | |
|------------------------------|---|---|
| 9 th July 2007 | Council Chamber, Swale House, Sittingbourne | Medway Estuary / Swale Estuary |
| 12 th July 2007 | Leysdown Parish Hall, Leysdown | Isle of Sheppey |
| 19 th July 2007 | Queen Elizabeth School, Faversham | Swale Estuary |
| 22 nd August 2007 | Canterbury City Council, Military Road Office | Agricultural Impacts and the assessment of Agricultural impacts throughout both the Medway Estuary and Swale SMP and Isle of Grain to South Foreland SMP2 |

A personal visit was made to a residential property affected by managed realignment in Ferry Lane, Wouldham.

B7.1.11 Co-ordination of Responses

E-mails, consultation response forms and written responses were directed to Canterbury City Council (CCC) for both the Medway Estuary and Swale SMP and the Isle of Grain to South Foreland SMP2. A designated email address was set up solely for consultation responses for both SMPs (smp@canterbury.gov.uk).

CCC forwarded the Medway Estuary and Swale consultation responses to Halcrow. Stakeholder responses received a standard reply acknowledging the response and informing them that a formal consultation response would be issued at the end of the consultation period. This reply was sent in e-mail or letter format with consistent format and text. Where necessary the responder received a more detailed response from the Environment Agency.

B7.2 CONSULTATION RESPONSES

B7.2.1 Form of Responses

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

- letters;
- consultation response forms (hand written and electronic);
- e-mails; and,
- comments from meetings (noted in meeting minutes).

B7.2.2 Method of Analysis

All comments and responses received were recorded as detailed below:

- upon receipt from Canterbury City Council, each response was given a unique reference number;
- details of each response were entered into a Consultation Response Register (e.g. date, name, contact details, area of interest, comment and if any revision may be required);
- each response was considered in turn and an acknowledgement of receipt of the response or if necessary, a detailed reply was sent to the responder; and,
- responses were categorised into the following themes – support for policies proposed; objections; environmental issues; economic issues; compensation issues; defences;

consultation process; relationship with other plans / policy; policy unit specific issues and other issues.

B7.2.3 Responses

The comments made in each response were recorded against the response themes referred to in **Section B7.2.2**. Chart 1 and Table 1 summarise the number of comments received, in terms of each theme.

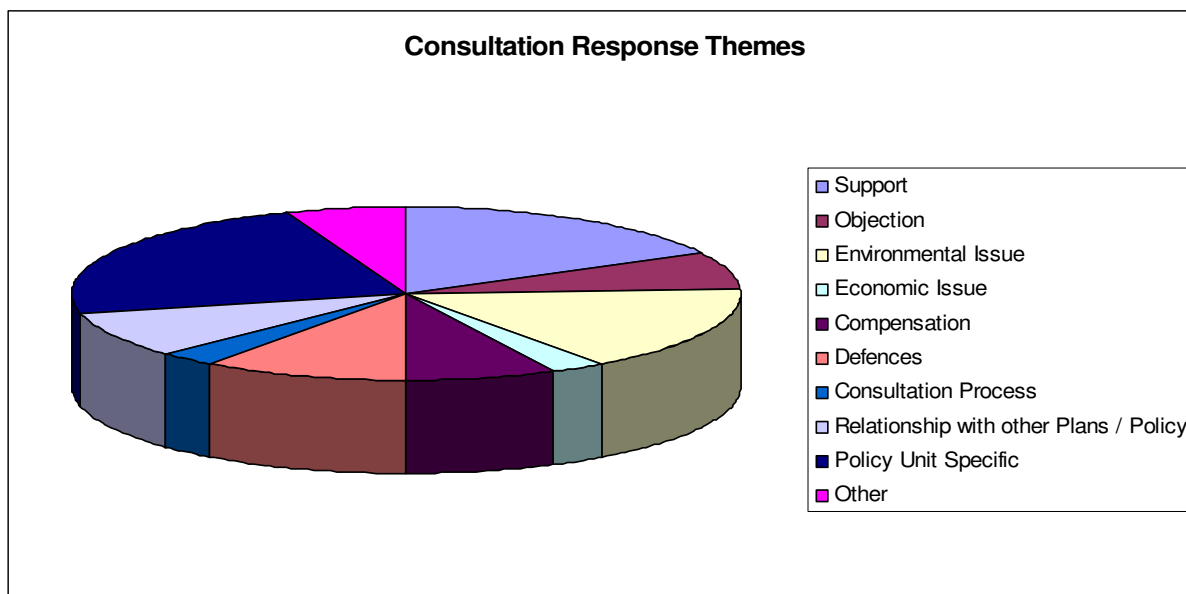


Chart 1: Share of comments received within consultation response themes.

Table 1: Number and percentage of comments received within consultation response themes.

| Theme | Number of comments | % of comments |
|--|--------------------|---------------|
| Support | 12 | 17 |
| Objection | 5 | 7 |
| Environmental issues | 11 | 16 |
| Economic issues | 2 | 3 |
| Compensation issues | 5 | 7 |
| Defences | 7 | 10 |
| Consultation process | 2 | 3 |
| Relationship with other plans / policy | 6 | 9 |
| Policy Unit specific issues | 16 | 23 |
| Other issues | 4 | 6 |

B7.2.4 Support

Comments were received expressing support for individual policies and / or the SMP as a whole:

'Actual policies themselves are, in their own right and independent of issues of funding and responsibility, sensible.' **Aylesford Parish Council**

'The South East England Regional Assembly broadly welcomes the proposed preferred policies in the North and East Kent SMPs. The documents represent a clear framework to address the management of coastal flood risk for the next 100 years through the application of four distinct policy options.' **South East England Regional Assembly**

'We would like to express our support for the proposed SMP, in particular for management section E4 21, which recommends a long term Hold the Line stance on existing sea defences.' **RPS Burksgreen on behalf of Gazeley UK Ltd / Standard Life Investments**

'The North Kent Rivers CFMP is currently undergoing policy appraisal. We will be taking the proposed SMP policies into account when deriving policies for the CFMP to ensure the policies are complementary. We will continue to liaise closely with the SMP teams.' **North Kent Rivers CFMP Project Manager, Environment Agency**

'All looks eminently sensible.' **Medway Valley Countryside Partnership**

'The Members of Faversham Town council welcomed the information that was contained in the Consultation Plan Summary andnotify that they fully support the policies as identified therein.' **Faversham Town Council**

'The changes proposed in the management plan should not seriously affect the navigation or enjoyment for the cruising yachtsman.' **Medway and Swale Area, The Cruising Association**

'The plan provides a good basis from which to develop the more detailed assessment and decision-making processes that lie ahead.' **Swale Borough Council**

Client Steering Group Response

The CSG would like to acknowledge and welcome the support given for the Medway Estuary and Swale SMP.

B7.2.5 Objection

Comments were received relating to objections to policies along specific frontages:

'Under the planned management changes it is anticipated that in the course of time salt water will invade the marshland currently surrounding Sandbanks Farm (Faversham), polluting the watercourses with saline water and thus destroying our fruit production business which is entirely dependent on the supply of fresh water. This supposition is based upon the water levels following the 1953 floods when the area in question was invaded with salt water. The current value at today's prices of crops grown by this company at Sandbanks Farm amounts to 4.5 million pounds, this figure is anticipated to increase in the future without taking inflation into account. This Company objects strongly to the proposals.' **Edward Vinson Limited.**

'Policy Units (E4 25 and E4 26) have the potential to result in major losses of agricultural land, which would directly effect our business and we would object to the proposals for each of these units.' **F D Attwood and Partners**

'We strongly disagree with and have very grave concerns with the scale of the managed realignment proposed in these SMP's.' **Friends of the North Kent Marshes**

'The Board express their objection to the majority of the proposals that involve Managed Realignment, whether it is now or in the future. The seawall may be financially unviable to continue to spend millions of pounds increasing its standard, but surely some protection to National and International Sites of Conservation or high quality farmland is better than losing these areas to the sea.' **Lower Medway Internal Drainage Board**

Client Steering Group Response

To react to stakeholder feedback and to ensure that the consultation of the SMP was effective, indicative managed realignment extents were identified and mapped for consideration. These indicative realignment extents were chosen after considering a number of factors. Theoretically the maximum extent of any realignment is limited by the extent of the floodplain. However, in reality there are a number of other constraints which mean the actual extent of any realignment is likely to be less than this. Within the present SMP, indicative realignment extents have been identified using the available information. The example extents identified have been chosen after considering:

- The provision of a more sustainable estuary alignment;
- The avoidance of built assets, infrastructure and internationally designated habitats where practicable;
- The provision of more economic, shorter and sheltered defences, incorporating high land where possible;
- The creation of intertidal habitat; and,
- The potential effects on estuary dynamics.

However, we would like to reassure people that the indicative realignment extents along any frontage where Managed Realignment has been proposed are not fixed and will be revised following further more detailed studies at Strategy Study level, before any realignment scheme is undertaken. Details relating to groundwater and saline intrusion will also be taken into consideration at this time. A timetable of further studies to assess managed realignment extents will be included in the SMP Action Plan.

Words will be added to the implications table for policy unit 4a 07A (Faversham Creek to the Sportsman Pub), in the Isle of Grain to South Foreland SMP, relating to the issue of saline intrusion of the watercourse in this area, as a result of the managed realignment policy.

In response to comments regarding losses of agricultural land within the SMP area with managed realignment policies, please refer to the minutes of a meeting held with the National Farmers Union on the 22nd August 2007, included in Annex B1 of this report.

With regard to the financial viability of defences, a more detailed economic appraisal, incorporating an in depth cost benefit analysis, will be undertaken at the Strategy Study level.

B7.2.6 Environmental Issues

Comments concerning environmental issues reflected heavily in responses and ranged from environmental issues connected with managed realignment policies, the perceived relative value of environmental assets, coastal squeeze and how the SMP complies with habitats regulations:

'We welcome the approach which has been taken in the two Shoreline Management Plans, and would support the adoption of managed realignment as the preferred option in those locations where there are not clear and immediate reasons to hold the current defensive line. You should note that we have no objection in principle to managed retreat being the preferred option where this would affect our nature reserves, nor where it would affect Local Wildlife Sites or other areas or habitats of importance for nature conservation. However, it is critically important to ensure that the process of realignment is managed in a way which: Maintains and enhances biodiversity and maintains and enhances opportunities for people to have contact with the natural environment.' **Kent Wildlife Trust**

'I believe that managed realignment should be applied in all suitable areas to expand marshland wildlife and act as a sponge to reduce future flooding'. **Wildlife Sailing**

'From Lafarge's point of view, investment in wildlife is in many respects similar to investment in any other property: it is all money paid out to secure and enhance a valuable asset. To destroy a wildlife asset by allowing or encouraging flooding (Managed Realignment), while maintaining flood defences to protect a conventional built asset, may accord with a public perception of commonsense, but is by no means an axiomatic choice. It may, indeed, be the best choice, but the SMP fails to justify it. It is therefore recommended that the SMP should not merely presume that built assets (houses, shops, factories etc) should be protected via Hold the Line or Advance the Line – i.e. protection strategies, but should justify such a choice in the light of the fact that many wildlife assets represent at least as large monetary investments as many houses, and arguably can represent equal or greater public benefit. As such, there could be instances where the balance favours continued protection of a wildlife site, but sacrifice of some built development.' **Lafarge**

'Where Coastal squeeze is identified as being an issue for international sites, information should be included as to how big losses will be over what time period – does accretion elsewhere mean that there will be no net loss within the SPA, or is compensatory habitat required?' **RSPB**

'The RSPB is seriously concerned that the Shoreline Management Plans (SMPs) as currently drafted could not be fully implemented and comply with the provisions of the Habitats Regulations due to damage to both intertidal and freshwater habitats as a result of policies. If damaging policies are to be pursued, the tests in the Habitats Regulations for there to be no less damaging alternatives and the damage to be in the overriding public interest must be met. The RSPB is concerned that these tests are not met for all damaging policy units, and that sufficient compensatory habitat will be difficult to provide. Whilst the RSPB would not wish to see freshwater habitat protected at all costs, but opportunities for realignment over non-designated land should be taken first, and losses to European sites fully justified. The SMPs should treat internationally designated and non-designated land differently. Opportunities to realign over non-designated land should be taken first, as this will result as a genuine increase in biodiversity resource, rather than converting one important habitat to another. The RSPB is concerned that the loss of so much internationally designated freshwater habitat, particularly in the Medway where there is very little opportunity to create compensatory habitat, will mean that the SPA will no longer function in the same way as it does now. This is not to say that freshwater habitat should be retained at all costs, but that the impact on the SPA should be

recognised, assessed and justified fully in terms of the tests in the Habitats Regulations. The SMP would be less damaging if fewer policy units proposed realignment, or if a different realignment line were chosen to avoid damaging effects, or if managed realignment were delayed until the later epochs when sea level rise and coastal squeeze issues would become more pressing.' **RSPB**

The Friends of the North Kent Marshes are gravely concerned that the damage to both intertidal and freshwater habitats contained within these draft proposals would mean that the SMP's could not be implemented **and** comply with the Habitats Directive - Conservation (Natural Habitats &c.) Regulations 1994. If these damaging proposals are to be implemented then the tests in the Habitats Regulations for there to be no less damaging alternatives and the damage to be in the overriding public interest **must** be met. Friends of the North Kent Marshes are gravely concerned that these tests are not met for all damaging draft proposals, and that sufficient compensatory habitat will be difficult to provide. Therefore opportunities for realignment over non-designated land should be taken first, and any losses to European sites fully justified..... Realignment over non designated land will provide an ideal opportunity to create **more**, not less, room for wildlife, a **genuine** increase in biodiversity resource, rather than converting one important habitat to another and upsetting the delicate, intricate balance of the ecological function of the estuary..... We are alarmed that the importance of the freshwater habitat within these draft documents has **NOT** been valued highly enough.... We strongly disagree with and have very grave concerns with the scale of the managed realignment proposed in these SMP's.' **Friends of the North Kent Marshes**

'How far inland does the SMP extend – as for wetland / wading birds in particular, the hinterland is very important.' **Medway Valley Countryside Partnership**

'Natural England welcomes and supports the managed realignment opportunities, which have been identified in this plan. Managed realignment is a positive step towards creating more naturally functioning and sustainable coastlines, whilst providing targeted flood risk management, climate change resilience and biodiversity creation opportunities.....we recognise that some of the proposed realignments will be across internationally designated freshwater sites. Natural England advises that when managed realignment proposals reach the strategy level, there should be a detailed study and prioritisation of the location of any realignment. This process is to ensure that particularly valuable freshwater habitats aren't lost and those that are lost are adequately compensated for, in terms of their botanical, bird and invertebrate interest.' **Natural England**

'The board has witnessed the natural creation of (intertidal) habitat over the last 30 years....proving that the natural tidal processes are creating a new habitat. The majority of the North Kent Marshes are / have an established habitat already; therefore (with managed realignment) we will be losing one type of habitat and replacing it with another. Who are we to say which type of habitat is more preferential? There are concerns especially among residents of the Isle of Sheppey that encouraging more marshy areas onto and around the island could be encouraging the proliferation of the mosquito, especially increasing the risk of the malaria mosquito because of the slightly warmer climate.' **Lower Medway Internal Drainage Board**

Client Steering Group Response

The SMP is a high-level policy setting document only. Policies have been chosen on the basis of the number of objectives achieved across a number of social, technical and environmental themes, including property, recreation, infrastructure, heritage, nature conservation etc. In this way, the

selection of policy endeavours to take equal account of all relevant features in identifying the best solutions.

The SMP does not determine the exact nature (scale) of how policies would be implemented. However, to react to stakeholder feedback and to ensure that the consultation of the SMP was effective, indicative managed realignment extents were identified and mapped for consideration (see CSG comment in section B7.2.5). We would reassure people that the indicative realignment extents along any frontage where Managed Realignment has been proposed are not fixed and will be reviewed following further studies at Strategy Study level, before any realignment scheme is undertaken. A timetable of further studies to assess managed realignment extents will be included in the SMP Action Plan.

These indicative extents were used to develop the draft Appropriate Assessment (AA) by the Environment Agency and Natural England on behalf of the coastal group. A final version of this AA will be developed taking these comments into consideration where the extent of the freshwater impact of Managed Realignment policies will be reassessed and may be refined. The final AA will then be issued to the Secretary of State (Defra) who will decide if any more work is required and give their agreement to the AA before the SMP is finalised. The Secretary of State will have the final decision as to the methodology and content of the AA.

The SMP recognises that compensatory freshwater habitat needs to be secured before it is lost and therefore makes recommendations in the Action Plan that further studies will be required to investigate mitigation measures for loss of designated freshwater habitat. The Regional Habitat Creation Programme (RHCP) for the South East will identify areas for habitat creation. The Catchment Flood Management Plan (CFMP) another high level strategic planning document similar to SMPs will identify policies for sustainable flood risk management within the river catchments and will aid identification of areas for habitat creation. The Greater Thames Coastal Habitat Management Plan (CHaMP), will investigate gains and losses of habitat and inform the next revision of the SMP and any strategies produced subsequently.

It should be noted, that devolvement of the SMP has involved input from a number of interested bodies, including the RSPB, Kent Wildlife Trust, and the Friends of the North Kent Marshes and others, and has the support of Natural England. Additionally, during the public consultation period, a meeting was held with the RSPB to discuss their concerns relating to these environmental issues. The CSG would like to reassure and reiterate to people that all consultees will again be invited to be involved in any subsequent studies.

The boundaries of the SMP cover both the Medway Estuary, from its mouth between the Isle of Grain and Sheerness in the north to its tidal limit at Allington Lock in the south; and the Swale Estuary, between the western mouth at Queenborough and the eastern mouth between Shell Ness and Faversham Creek, extending to the tidal limits of Milton, Conyer, Oare and Faversham Creeks. The SMP extent either side of each estuary is based on the topography and limit of the indicative floodplain (1 in 200 flood extent). Within these areas the inland SMP extent is governed by the choice of policy in that area (e.g. hold the line defence line, managed realignment defence line).

B7.2.7 Economic Issues

Comments concerning the economic assessment process:

'Further work should be undertaken on the economic comparisons between creating new freshwater marsh to replace land lost to brackish marsh by reason of facilitating tidal flooding, and between either solution and the economic value of retaining minor groups of built development.' **Lafarge**

'Out of date figures for land values based on 2004 statistics have been used....more current figures are available...and should be used. A further issue is the arbitrary 35% discount in value to allow for subsidies. In 2005 all EU subsidies were decoupled and play no part in current land values...Clearly no correction factor should be applied and the full current land values used for assessing economic viability. At this stage it is difficult on economic grounds to justify the policies being put forward because the economic detail is not supplied.' **F D Attwood and Partners**

Client Steering Group Response

Further, more detailed, economic assessments will be undertaken at Strategy level. The economic assessment carried out within the SMP has been undertaken in full accordance with the procedures set out in Defra's SMP Guidance (Defra, 2006) and Defra's economic appraisal guidance (Flood and Coastal Defence project Appraisal guidance 3, FCDPAG3). This follows the Treasury 'Green Book', which provides the Government's guidance on economic appraisals. Defra has advised that FCDPAG3 Guidance on economic appraisal is planned for review in the future but the revised document will not be available for sometime yet.

With regard to land values, in both the Medway Estuary and Swale SMP and the Isle of Grain to South Foreland SMP2, we have used up to date figures issued by Defra in December 2006. The SMP team have identified that the Savills information referred to in the SMP guidance is not available and will recommend the guidance is revised to include another Defra approved source that is continually up to date.

Correspondence between Defra and the Chair of the South East Coastal Group has concluded that due to changes in the approach to UK agricultural subsidies, the use of the multiplier factor specified in FCDPAG3 guidance, for calculating land values, may now mean that the appropriate value of agricultural land for project appraisal purposes is being underestimated. The more recent publication of the Flood Hazard Research Centre FHRC (Middlesex University) 'The benefits of flood and coastal risk management: A handbook of assessment techniques (2005)' has reviewed this area considering the evaluation of land lost to agriculture on a similar basis to FCDPAG3. This recommends that for all agricultural land use values from 2005, 'land loss should be assumed to be equivalent to 65% of prevailing land values'. A multiplier of 65% has, therefore, been used in both SMPs.

A sensitivity analysis has been undertaken with regards to increasing land values, where land values were doubled. This analysis has been incorporated into Appendix H. Separate meetings have also taken place with the NFU concerning this matter. See minutes included in Annex B1 in the Consultation report.

The CSG would like to restate that policies have not been derived based solely on the economics. Policies have been chosen on the basis of the number of objectives achieved across a number of social, technical and environmental themes. A socio-economic analysis is carried out after the policy has been identified to assess economic viability. Defra reiterate that the selection of an SMP policy should not be hindered by any economic evaluation. It should be recognised, therefore, that the

justification for a particular policy is not necessarily dependant on economic viability as impacts on other benefits may be considered more important.

B7.2.8 Compensation Issues

Comments concerning the lack of compensation to land and property owners, through potential loss of assets under the proposed policies:

*'Policy E4 16 - We would like to seek clarification about the rights of the owners of isolated properties e.g. compensation. We would like to seek clarification about the rights of houseboat owners affected by the SMP proposals'. **Upchurch Parish Council***

*'In the documents reviewed, little or no mention has been found on how impacted communities will be compensated and relocated. We believe that no policies on managed realignment should be recommended or finalised until Defra has provided definitive guidance on:(a) compensation rights for private home and land owners; (b) what support (financial or non-financial) will provided to those who want to relocate but cannot because of property blight; and(c) the continued investment and provision of services and infrastructure in those areas that may eventually be lost to sea.' **CPRE Kent***

*'The idea of identifying possible areas for substantial MR or NAI and then building the economic case after causing great public and private concern is deeply flawed as a process. Underpinning the SMP process should be a clear commitment by the EA and Government that if the public purse is served by changing coastal defences than part of the saving should go to recompense property owners.' **F D Attwood and Partners***

*'A large amount of land (at Halling) will be lost across the marsh (under a managed realignment policy), some of which generates a revenue for the Parish council. Also the benefit of the land will be lost to Parishioners and the Parish Council would like to know if there are any plans to offer financial compensation for this loss of use?' **Halling Parish council***

*'The process for compensating landowners and property owners is not clear. While it is understood that this is a national issue that will be the subject of future guidance from Defra, it would be helpful for the SMP to clearly identify as best it can the availability and process for seeking such compensation.' **Swale Borough Council***

Client Steering Group Response

The SMP (Main document - Section 4.3.1) explains that where policies may result in an increased risk to property and assets, whether due to coastal erosion or flooding, the effect on property owners should be managed through exit strategies. These will need to address the removal of buildings and other facilities well in advance of any loss. The plans for relocation of people also need to be established, as does the basis on which mitigation should be funded. However, mitigation measures do not fall solely upon national and local government, and should not be read as such within this plan. Business and commercial enterprises will need to establish the measures that they need to take to address the changes that will take place in the future. This includes providers of services and utilities, which will need to make provision for this long-term change when upgrading or replacing existing facilities in the shorter term. They should also consider how they will relocate facilities that will be lost to erosion or flooding, and the need to provide for relocated communities. Other parties needing to consider mitigation measures will be the local highways authorities and bodies responsible for local amenities (including churches, golf clubs etc).

Private land and property owners will need to consider how they will deal with changes to the shoreline that affects their property. Since flood and coastal defence legislation in England and Wales is permissive, it does not mean a right to protection against coastal flooding or erosion. Similarly, there

is no provision for compensation from central funds to offset any loss suffered by property and landowners.

As the SMP is a non-statutory policy document for coastal defence planning, it is unable to provide solutions to issues such as compensation. The suggestions that compensation should be paid to those who lose assets due to flooding or erosion may appear to provide a solution, but the costs of such a measure would be high (financial and lost opportunities) and must therefore be properly evaluated against other demands upon taxpayer's money. The budget allocated for flood and coastal defence management in England and Wales is a proportion of the full national budget. As such, if compensation were introduced, decisions would have to be made regarding whether it should be provided at the expense of defence scheme implementation elsewhere (if taken from the existing flood/erosion budget), or if it should be funded from a different area of the national budget (e.g. education, health, police, etc).

Defra, however, recognise that the compensation issue has a direct major affect on the landowners and are investigating the best ways to help people adapt to situations where property is exposed to greater flooding and erosion. This work is underway and will clarify the way forward in this situation. Please see: <http://www.defra.gov.uk/environment/flooding/manage/index.htm>

The current position on compensation is stated in Section 4 of the Defra Guidance Note on Managed Realignment: Land Purchase, Compensation and Payment for Alternative Beneficial Land Use. This can be viewed at: <http://www.defra.gov.uk/environment/flooding/policy/guidance/realign.htm>

B7.2.9 Defences

Comments concerning the funding of defences, defence ownership and responsibilities and defence options:

'The SMP is silent on two issues that are important to the council (Aylesford Parish Council - APC) (1) funding for flood protection and coastal defence measures; and (2) split of responsibilities between riparian landowners, Environment agency and councils. So there is a risk of APC, as a riparian landowner, supporting policies which it would have to pay for but which would also benefit other landowners and the wider public. Nothing wrong with that in principle but there is a need for the APC to ensure that its contribution to costs is equitable and proportionate and also that other bodies with the appropriate expertise are involved.' **Aylesford Parish Council**

'We propose that the expenditure would be far better used in the construction of a dam from the North Kent coast right across the estuary to Essex in order to enclose all this area.....the Thames, Medway and Swale would become a huge freshwater lake...and could be made available to the whole of the South Eastern Counties.' **Teynham Parish Council**

'The overriding principle in these SMPs appears to be that urban areas are to be protected at all costs and rural areas should have a presumption of expendability regardless of social, economic or environmental value.' **CPRE Kent**

'Minster-on-Sea Parish council has grave concern that only the urban developments appear to be given priority for protection. If this plan is allowed in this form, the true identity of the Isle of Sheppey will be lost forever.' **Minster-on-Sea Parish Council**

'I favour the maximum protection of the coastline. A laid-back attitude to losing land to the sea may not look so wise to future generations.' **J Coulter**

'An issue that has been raised through our public meetings is how could landowners progress their own coastal protection works....Details of how to undertake this work should be included within the text of the SMP.' **Swale Borough Council**

'The requirement for maintenance of existing defences also needs to be examined as a part of the SMP. A lack of maintenance, while making savings in the short term, would be offset by the potential of much greater costs in the future. The integrity of existing defences must therefore be maintained, which in turn requires a programme of maintenance that has sufficient funding to meet the requirements of the SMP.' **Swale Borough Council**

'What is the point of promoting a new realignment policy that will probably have no funding in the future? What is the cost of maintaining the existing flood defences compared to building new ones? New structures would need maintaining in a similar fashion to the existing ones, therefore, will financial funding be provided, or is there a risk in the future this would be removed? Would the Environment Agency consider letting the landowners repair or improve their own sections of sea wall?' **Lower Medway Internal Drainage Board**

Client Steering Group Response

The SMP is a non-statutory policy document for coastal defence management planning. It takes account of other existing planning initiatives and legislative requirements, and is intended to inform wider strategic planning. It does not set policy for anything other than coastal defence management. The SMP does not comment on funding for flood protection and coastal defence measures. Whilst the

selection of the preferred plan considers the affordability of each policy, its adoption by the authorities does not represent a commitment to fund its implementation (see Section 1.1.1 in the main SMP document).

The second round of SMPs now look at flood and erosion risk management over the next 100 years rather than 50 years, to develop more sustainable long-term policies, rather than short-term reactive policies. The SMP therefore, promotes management policies for a coastline into the 22nd century, which achieve long-term objectives without committing to unsustainable defence practices. It is, however, recognised that due to present-day objectives and acceptance, wholesale changes to existing defence management may not be appropriate in the very short-term. Consequently, the SMP essentially provides a 'route map' for decision makers to move from the present situation towards the future. It is recognised that there will always be uncertainty associated with considering the long-term, both in terms of extrapolating information and making predictions regarding coastal risks, future legislative requirements, opportunities and constraints. The main guiding principle therefore, is that the SMP needs to define a long-term sustainable plan, even though that may change with time.

Maximum protection of the coastline will be unsustainable and uneconomic in the future, as sea levels rise:

- hard defended areas will become headlands;
- intertidal areas (e.g. beaches, mudflats, saltmarshes) in front of defences will be lost to increased erosion;
- flooding and erosion risks will increase; and,
- there will be a need for more substantial and expensive defences.

Adoption of Managed Realignment policies instead of Hold the Line will therefore, provide more sustainable and cost effective coastal flood and erosion management in the future by:

- reducing flood risk to the hinterland by absorbing tidal and wave energy;
- improving the natural functioning of the coast / estuary;
- increasing the natural flood and storm buffering capacity;
- reducing the effects of coastal squeeze;
- managing the effects of sea level rise; and,
- creating intertidal habitat.

As stated previously (Section B7.2.7), the SMP is not purely economically driven; policies have been selected on the basis of the number of objectives achieved across a number of social, technical and environmental themes, including property, recreation, infrastructure, heritage, landscape, nature conservation etc. In this way, the selection of policy takes equal account of all relevant features in identifying the best solutions. Further, more detailed, economic assessments, incorporating cost benefit analysis of defence options, however, will be undertaken at Strategy level.

Details on how landowners can progress their own coastal protection works is beyond the scope of the SMP. However, Defra's position on the maintenance of uneconomic sea flood defences can be viewed at: <http://www.defra.gov.uk/environment/flooding/documents/policy/guidance/seadefence.pdf>

Information from the Environment Agency on the rights and responsibilities of riverside occupation can be viewed at:

[http://publications.environment-agency.gov.uk/pdf/GEHO0407BMFL-e-e.pdf?lang= e](http://publications.environment-agency.gov.uk/pdf/GEHO0407BMFL-e-e.pdf?lang=e)

B7.2.10 Consultation Process

Comments were raised concerning the consultation process with stakeholders:

'CPRE Kent would like to know what efforts the elected members made to contact and consult with their most vulnerable constituents (who are mainly in rural semi-rural areas) early on the SMP process before the consultation document was released.' **CPRE Kent**

'This company only came across the consultation plan summary by accident. What action are you taking to see that all land owners are properly consulted?' **Port Werburg**

Client Steering Group Response

Development of the SMP has been led by the Client Steering Group (CSG) comprising members of the South East Coastal Group which include technical officers and representatives from councils and other organisations. In addition, stakeholders have been involved throughout the development of the plan. Initial contact was made with over 190 stakeholder organisations at the Initial Stakeholder Engagement stage. From these, 60 Key Stakeholder organisations have been involved in Key Stakeholder Forums at key decision points throughout the SMP development. Elected Members representing each of the operating authorities throughout the SMP area have also been regularly involved in assisting with the development of the SMP. A full list of stakeholders can be found in Section B2 and the programme of stakeholder engagement, undertaken throughout the development of the SMP, is included in Section B1 of this Appendix.

A strategy for the public consultation was extensively discussed with and agreed to by the Project Steering Group, Council Elected Members and Key Stakeholders, in order to reach as many stakeholders and members of the public as possible (see Section B7.1).

The public consultation ran from 14th May 2007 to 7th September 2007 and the approach adopted included:

- issuing press notices in local papers and council magazines;
- issuing press releases for local parish magazines and newsletters;
- writing to the 190 stakeholder groups representing parties across North and East Kent to notify them of the public consultation;
- use of the South East Coastal Group website. The full SMP documentation and consultation response form was available to review and download at www.se-coastalgroup.org.uk;
- the production of a leaflet summarising the SMP process and proposed policies. This was issued to all identified consultees and was also available at Local Authority offices, at the Environment Agency office at Addington and libraries throughout the study area;
- hard copies of the Draft SMP Document (both the Main Document and the Supporting Appendices) were on deposit in Local Authority offices, the Environment Agency office at Addington and libraries throughout the study area; and,
- public meetings that have been held when requested.

The SMP public consultation took place over a 3 month period between 14th May 2007 and 7th September 2007, which followed the recommendations included in Defra SMP Guidance. The consultation period chosen was from May to September to allow for holidays and to reach people with

holiday homes. A degree of flexibility has been provided with regards to the deadline for responses, to allow those responses received after the deadline to be considered.

The CSG would like to reiterate that all comments made are very important and will be taken into consideration. The CSG would also like to reassure people that further consultation will also take place at Strategy Study levels, where more detailed appraisal of how policies will be implemented will be undertaken.

B7.2.11 Relationship with other Plans / Policy

Comments concerning where the relationship of the SMP and other plans / policy:

'We would like to see a clear statement of how coastal flood management policy decisions in the SMP relates to Human Rights legislation.' **CPRE Kent**

'It is not clear why the SMP options are limited to four options and the CFMP has six and how are they linked'? **CPRE Kent**

'The SMP documents do not clearly show the hierarchy and interaction of flood management and spatial planning documents..... If SMP policies represent a coarse resolution that will be examined in more detail during the CFMP, this needs to be communicated more clearly to avoid undue public anxiety.' **CPRE Kent**

'The relationship between the SMPs and Development Plan Documents is not entirely clear, and it is not explained how the SMPs may be used as a tool to target funding for required measures, although this is crucial for the delivery of Development Plan Documents.' **South East Regional Assembly.**

'The senior regional partners of the South East Coastal Group be requested to set out a clear action plan detailing the level of financial commitment from central government in delivering the Shoreline Management Plan and the agencies responsible for the implementation of policies identified.' **Tonbridge and Malling Borough Council.**

'What, if any, measures have/are been considered in relation to the long-term Thames Gateway development proposals, which we understand will have a long-term impact on tidal patterns and levels along the entire North Kent coastline. We suggest that the SMP should make due consideration for this event, and provision be made to review the policy accordingly as and when the likely knock on effects become known.' **Faversham Creek Consortium management group (FCC).**

'The North Kent Rivers CFMP is currently undergoing policy appraisal. We will be taking the proposed SMP policies into account when deriving policies for the CFMP to ensure the policies are complementary. We will continue to liaise closely with the SMP teams.' **North Kent Rivers CFMP Project Manager, Environment Agency**

'Natural England advises that any future revisions of the SMP or even detailed further studies carried out at either the Strategy or Scheme level, take into consideration the findings of the finalised Greater Thames CHaMP.' **Natural England**

Client Steering Group Response

The policy decisions presented in the SMP have been thoroughly appraised and are based upon best scientific knowledge and adhere to Defra policy guidance. Defra's position with regards to the maintenance of uneconomic defences and Human Rights legislation can be viewed at: <http://www.defra.gov.uk/environment/flooding/documents/policy/guidance/seadefence.pdf>

Catchment Flood Management Plans (CFMPs) provide a similar level of strategic planning as SMP's. Both plans are non-statutory, however, SMPs identify broad policies for sustainable coastal flooding and erosion risk management, while CFMPs identify broad policies for sustainable flood risk management within river catchments. Links between SMPs and CFMPs are important where there needs to be integrated management of river and coastal flooding and, for example, where a CFMP could identify potential areas for habitat creation as mitigation for habitat lost at the coast.

As identified in the comment by CPRE Kent, the SMP is limited to only four potential management options, while CFMPs have six:

SMP Policy Options

- No Active Intervention;
- Hold the line;
- Advance the Line; and,
- Managed Realignment.

CFMP Policy Options

- No Active Intervention;
- Reduce the existing flood risk management actions;
- Continue with the existing or alternate actions to manage flood risk at the current level;
- Take further action to sustain the current level of flood risk into the future;
- Take further action to reduce flood risk; and,
- Take action to increase the frequency of flooding to deliver benefits locally or elsewhere.

SMP policy options are tailored to shoreline flood and erosion risk management, where policies focus on the defence line, i.e. policy options are chosen to either hold, advance or realign the position of the defence line or do nothing. CFMP policy options are relevant to fluvial flood risk management only, where policies concentrate on determining whether flood risk should increase, decrease or remain the same.

Shoreline Management Plans and Catchment Flood Management Plans (CFMPs) are both high level documents that provide large-scale assessments of the risks associated with coastal processes for a specified length of coastline, and flood risks for a specified river catchment, and present policy frameworks to reduce these risks. As such, they sit at the top of a hierarchy of plans that proceeds from SMPs to Strategy Plans to specific scheme designs:

- **Shoreline Management Plans** – aim to identify policies to manage coastal flood and erosion risks, deliver a wide ranging assessment of risks, opportunities, limits and areas of uncertainty.
- **Strategies** – aim to identify appropriate schemes to put the policies into practice, identify the preferred approach, including economic and environmental decisions.
- **Schemes** – aim to identify the type of work to put the preferred scheme into practice, compares different options for putting the preferred scheme into practice.

The policies set out in the SMP can not be implemented through coastal defence management alone. There is a need for spatial planning to adopt the policies, and understand their consequences, such that risk areas are avoided by development, and future changes in policy are facilitated. The SMP is accompanied by an Action Plan which aims to:

- facilitate implementation of the SMP policies;
- identify and/or promote studies to further/improve understanding where this is required;
- to resolve policy and/or implementation;

- set out sources of funding for achieving the plan, where appropriate;
- promote use of the SMP recommendations in spatial planning by informing and supporting the planning system;
- identify procedures for the management of the SMP until its next review; and,
- establish a framework to monitor progress against the action plan and initiate future SMP review.

The Action Plan is the responsibility of the operating authorities and the South East Coastal Group. Each Local Authority is accountable for ensuring that the SMP policies are appropriately reflected in the relevant planning documents (e.g. Regional Plans, Local Development Frameworks) and that they are communicated across the council directorates.

Text will be added to the Main SMP document to clearly explain where the SMP sits in relation to Strategies and Schemes and how the SMP is used to inform spatial planning.

The SMP has taken into consideration policies from other relevant plans and strategies and has liaised closely with these studies throughout the production of the SMP to ensure consistency, share information and make certain that proposed policies are complimentary with policies in adjacent plans. Team members delivering these plans and strategies have been part of the SMP stakeholder process throughout the production of the SMP and members of the Client Steering Group are also familiar with these other plans.

The SMP is a document subject to regular reviews to take account of developments in both process understanding and policies as well as developments in ongoing work such as TE2100. Reviews of the SMP are anticipated to be carried out on a 5 – 10 year basis, although this timescale will be driven by the availability of new information and advances in the understanding of the estuaries. In addition to further studies identified in the Action Plan, other studies, such as the Greater Thames CHaMP and the Medway and Swale CFMP, will be used to inform the next SMP revision.

B7.2.12 Other Comments

'There seems to be no consideration of the effect of any such policies upon current or future commercial traffic below Allington Lock.' **Lefarge**

'Dealing with more extreme sea-level rise projections may be the subject of a higher level policy review by Defra to influence future reviews of both SMPs. However, we urge members of the South East Coastal Partnership to bear in mind the increasing likelihood of major sea level rise when considering coastal development projects with an expected lifespan greater than 50 years and the likely costs and environmental implications for protecting them. Based on the current consensus on sea-level rise, CPRE Kent supports the use of figures that broadly equate to the pessimistic 'High Emissions' scenario than the 'Low Emissions'. However, we would welcome debate on adaptation options for more severe sea level rise scenarios.' **CPRE Kent**

'When considering a preferred policy for a given reach, how are the knock-on effects on other reaches assessed?' **CPRE Kent**

'The Borough Council considers that the document should carry much more weight and have future funding allocated directly to the delivery of the SMP.' **Swale Borough Council**

'The SMP should provide a clearer definition of risks, and the probability of those risks, along the coastline.' **Swale Borough Council**

'There is a Government Policy of providing mitigation sites for the new developments within the floodplain, but these areas may be lost to the sea with the EAs new policy of managed realignment. So was this considered? Creating new mitigation sites would also mean losing more agricultural land...It seems that growing food is again one of the Government's priorities, therefore, what is the point of losing some of Kent's best farmland to the sea?...The Government's targets for increasing the number of houses in the Thames Gateway area and having the area of seawall reduced means new houses would be closer to the risk of flooding.' **Lower Medway Internal Drainage Board**

Client Steering Group Response

The CSG agree that policies proposed along the upper reaches of the Medway Estuary, up to Allington Lock, may impact upon current or future commercial traffic and therefore text to this effect will be added to the impact tables of the relevant Policy Unit Statements. The effect of these policies upon current or future commercial traffic below Allington Lock will also be assessed in more detail at Strategy Study level in an Impact Assessment. An action plan will be included with the final document which will include a prioritised programme of these future strategies and an outline of future schemes, coastal monitoring and other studies. The CSG would also like to highlight that Medway Ports, the statutory authority for a 44 km stretch of The River Medway and The Swale, has been involved in the stakeholder process during the development of the SMP.

Natural changes in the coast, together with the expected implications of climate change and a rise in sea levels, are a significant challenge to managing the shoreline in the future. Defra (2006) SMP Guidance therefore, highlights one of the main objectives of an SMP as ensuring that shoreline management policies take account of current Government climate change guidelines associated with flood and coastal defence. Therefore, the Defra (2006) interim policy guidance of updated sea level rise predictions and indicative sensitivity range estimates has been used in the Sensitivity Testing (Appendix H) in this SMP.

Defra SMP policy appraisal guidance has been followed which includes the identification and appraisal of policy scenarios along the shoreline as a whole, as well as for individual units. Policy appraisal has taken into consideration the sediment linkages and interdependencies along both shorelines of the Medway and Swale estuaries using information provided in the Baseline Process Understanding report (Appendix C). Policies have also been appraised on the basis of the number of objectives achieved across a number of social, technical and environmental themes, including property, areas identified for development, agriculture, recreation, infrastructure, heritage, landscape, nature conservation etc. In this way, the selection of policy takes equal account of all relevant features in identifying the best solutions.

In studies of a dynamic coastline there are always going to be uncertainties, particularly when predicting future change. Policy setting therefore has been based on the best knowledge at the time of policy development. Risks such as sea level rise and increased storminess have been acknowledged in the Sensitivity Analysis report (Appendix H). A baseline assessment of risks from coastal erosion or flooding to feature was undertaken during development the SMP. The predicted shoreline change for No Active Intervention, using available / estimated erosion rates and 1 in 200 year flood mapping from the Environment Agency, was used as the baseline against which features were identified as being at 'risk' from flooding or erosion. In the case of flooding risks, it was assumed that should flood defences be breached, the whole floodplain would be at 'risk'. Erosion risks were quantified over three defined future points in time: year 20, year 50 and year 100. Where there are existing defences, their residual life was used to inform the timing of possible flood or erosion risk.

However, further studies will revisit and examine these risks in more detail. For example, as part of the Government's Making Space for Water programme, a National Coastal Erosion Risk Mapping project is being undertaken to map predicted erosion risk around England and Wales. This is due to be completed by the end of 2008 and any impacts on the SMP will be taken into account at the next SMP review.

The SMP and other shoreline management plans around England and Wales have to work within Treasury Guidance and therefore are unable to affect the apportioning of Government funds. The CSG will however, forward the comment from Swale Borough Council, regarding funds being allocated to implement the SMP policies, to Defra.

B7.2.13 Policy Unit Specific Issues

The following responses are related to the individual Shoreline Management Plan Policy Units:

E4 01 – Grain Tower to Colemouth Creek

‘Coastal squeeze is identified as being an issue for the Medway Estuary and Marshes SPA in this unit. Information should be included as to how big losses will be over what time period – does accretion elsewhere mean that there will be no net loss within the SPA, or is compensatory habitat required?’

RSPB

Client Steering Group Response

Please refer to the CSG response given in Section B7.2.6 – Environmental Issues.

E4 02 – Colemouth Creek to Bee Ness Jetty

‘The statement for this policy unit asserts that the growth of intertidal habitat at Stoke Saltings is very important in maintaining the internationally designated habitat. However, whilst saltmarsh may be accreting, the growth of Spartina dominated swards result in loss of mudflat and may be responsible in part for declines in SPA bird species in the Medway. Therefore, although saltmarsh is important for maintaining the SPA, growth of Spartina monocultures at the expense of mudflat, might not be. It is disappointing that the statement for this policy unit does not recognise the importance of the SPA/Ramsar habitat landward of sea defences in this unit. The area proposed for realignment adjacent to Colemouth Creek has been identified in Wetland Bird Survey Low Tide Counts as important brent goose feeding habitat. The turbine closest to this area in the proposed Grain wind farm was removed to avoid disturbance to brent geese using this area. Natural England and the RSPB negotiated hard for the removal of this turbine to protect the brent goose feeding area, therefore it would be disappointing if it were then lost to realignment.’ **RSPB**

‘Lower Stoke and Middle Stoke are not all on higher ground, and are liable to flooding, in particular the seawall at Middle Stoke is very low, 1 in 100 years only defence.’ **Stoke Parish Council**

‘The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.’ **Natural England**

Client Steering Group Response

Please refer to the CSG response given in Section B7.2.6 – Environmental Issues. The freshwater habitats behind defences in this unit are recognised as being internationally designated for their ecological importance in the E4 02 policy unit statement.

Words will be added to the policy unit statement to reflect the fact that the villages of Lower Stoke and Middle Stoke are not all on higher land. Text will also be added to the associated policy unit implications table indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies necessary to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 04 – Kingsnorth Power Station to Cockham Wood

'The RSPB supports the policy for managed realignment on the area immediately to the east of Hoo Marina Park because this would not impact internationally designated freshwater interests. The area proposed for managed realignment immediately to the west of Kingsnorth Power Station is designated as SPA/Ramsar. Compensatory habitat will need to be provided for the loss of this habitat. The EIA for the current proposals at Kingsnorth Power Station may provide detail on how the indicative realignment extent is used by SPA birds, and therefore, its importance in the context of the whole SPA. The indicative realignment line seems sensible in that some freshwater habitat is maintained, so that birds will still be able to use both types of habitat in this area. There appears to be space inland for the lost freshwater habitat to be re-created adjacent to the retained freshwater portion.' **RSPB**

'The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.'
Natural England

Client Steering Group Response

Text will be added to the policy unit implications table indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 05 – Hoo Marina to Lower Upnor

'Part of this frontage includes intertidal habitat designated as SPA/Ramsar, but there is no consideration of impacts on this habitats in the table of implications of the plan for this location.' **RSPB**

'The company is the owner of part of the shoreline designated E5 Hoo Marina to Lower Upnor. This part of the shoreline has several developments and is certainly not 'undeveloped'. It is not inevitable that the sea level rise will threaten the Saxon Shore Way. This footpath is already impassable at spring tides as the route runs below sea level. We are not aware of an alternative route to the Saxon Shore Way. It is a matter of opinion that it is 'unsustainable and uneconomic' to protect the heritage feature. It is not an opinion shared by this company.' **Port Werburg**

Client Steering Group Response

There is a small section of intertidal habitat which is internationally designated, along the eastern section of the frontage. A no active intervention policy is already being implemented along the frontage. There is predicted to be no adverse impacts on the habitat as a result of the policy and therefore text to this effect will be added to the E4 05 Implications Table and Policy Unit Statement.

The section of shoreline which includes Hoo Marina is actually Policy Unit E4 04 Kingsnorth Power Station to Cockham Wood. The title E4 05 'Hoo Marina to Lower Upnor' may be misleading and therefore will be changed to E4 05 'Cockham Wood', for clarity, in the final document.

We propose to change the text in the policy unit statement for E4 05 to read that the Saxon Shore Way will become inundated more often as sea levels rise. The Ordnance Survey map for Policy Unit E4 05 shows an alternative route of the Saxon Shore Way inland, between Cockham Farm and Hoo Lodge. English Heritage has been closely consulted with throughout the SMP process and they concur that it would be unsustainable to install defences along this natural coastline solely to defend this feature in the future.

E4 06 – Lower Upnor to Medway Bridge

'The Temple Marsh 'Hold the Line' strategy is supported'. Lefarge

E4 07 – Medway Bridge to North Halling

'The Halling and Holborough marshes 'Managed Realignment' strategies require further work, including at the more detailed level, before they can be endorsed.' Lefarge

'The table recording the implications of the plan for this location states that there will be no loss of designated habitat. However, the only designated habitat in the area is SSSI woodland on the top of the hill, so whatever the policy the SSSI will not be affected. Therefore, the RSPB cannot see why it is mentioned in the table.' RSPB

Client Steering Group Response

The policy unit statement for E4 07 identifies that "further studies will be required to investigate and define the exact standard and realignment of any defences for this frontage", and the main document highlights that "further studies will be required to investigate managed realignment i.e. the viability of the policy; future morphology of the estuary; the combined effect of multiple realignments between Medway Bridge and Allington Lock and to define the standard and alignment of defences".

The CSG agree that there is no designated habitat along the frontage and therefore, to be consistent, the text in the implications table, under 'Nature Conservation', will be amended to read 'No nature conservation issues identified'.

E4 08 – North Halling to Snodland

'The RSPB supports managed realignment at Halling because no statutorily designated habitat would be adversely affected. As identified in the statement for this policy unit, Holborough Marshes is designated as SSSI. This means that there is no statutory requirement to compensate for losses to the freshwater habitat. However, as a 'Section 28G' body under the Countryside and Rights of Way Act 2001, the EA has a duty to conserve and enhance SSSIs, and therefore the RSPB view is that SSSI losses should be compensated as a matter of policy.' RSPB

'Are there any defined plans available to replace and/or re-site the Public Rights of Way which would become unusable (under managed realignment in E4 08)? If so, is there a set time-scale already available? If not, could the Parish Council be involved in the planning detail of the re-siting of the Public Rights of Way? Halling Parish Council

Client Steering Group Response

The Policy Unit Statement for E4 08 notes that footpaths, including Public Rights of Way (PRW), will need to be re-routed where managed realignment is implemented. The detail regarding relocation of paths and PRW is beyond the scope of the SMP. However, information from Defra regarding making changes to Public Rights of Way can be viewed at:

<http://www.defra.gov.uk/rural/countryside/prow/index.htm>

E4 09 – Snodland to Allington Lock

'Hold the line would be right for the section within Aylesford parish as this shoreline protects valuable residential, commercial, industrial, recreational and historic assets, including the south side of the Old Bridge.....However managed realignment could be appropriate for the more rural areas beyond the parish up to Snodland if justified on both environmental and / or economic grounds.....some loss of agricultural land....could be appropriate given the lower value of what is currently agricultural land compared to other land uses.' **Aylesford Parish Council**

'It is not clear why further studies on the viability of managed realignment are needed here but not elsewhere, for example where SPA/Ramsar habitats are impacted. The RSPB supports the indicative realignment extent downstream of Aylesford as statutorily designated sites would not be impacted. The other proposed realignment in this unit would impact SSSI freshwater habitat. Therefore, as for unit E4 08, the RSPB advocates the provision of compensatory habitat as a matter of policy.' **RSPB**

Client Steering Group Response

Further more detailed studies will be required to investigate the implementation, extent and location of a managed realignment policy (in this unit and all other units where managed realignment policies are proposed) i.e. the best technical, environmental and economic option that best manages flood risk, as well as to investigate the standard of protection and alignment of defences and any mitigation measures required for loss of designated habitats. This will be added to each policy unit statement, where appropriate, and considered in the Action Plan.

E4 10 – Allington Lock to North Wouldham

'Hold the line would be right for the shoreline within Aylesford parish as this section protects valuable, residential, commercial, industrial, recreational and historical assets, including the north side of the Old Bridge.....Managed Realignment could be appropriate to the more rural areas beyond the parish.' **Aylesford Parish Council**

'It is not clear why further studies on the viability of managed realignment are needed here but not elsewhere, for example where SPA/Ramsar habitats are impacted. The RSPB supports managed realignment at Aylesford and Wouldham as no statutorily designated sites would be impacted. The other indicative realignment in this unit affects a SSSI, so habitat loss should be compensated as a matter of policy.' **RSPB**

Client Steering Group Response

Please refer to the CSG response for E4 09.

E4 11 – Wouldham Marshes

*'The preferred policy from present day and medium to long terms are for **Managed Realignment** but in the table showing the management activities **Hold the Line** seems to be the policy, therefore my question is which policy is correct?'* **Lower Medway Internal Drainage Board**

'The RSPB supports managed realignment in this unit because although grazing marsh would be affected, it is not statutorily designated.' **RSPB**

Client Steering Group Response

The policies shown on the map are incorrect. The correct policies should read Managed Realignment in all three epochs and will be corrected in the final document.

E4 13 – St Mary’s Island to The Strand

*‘The statement for this policy unit asserts that coastal squeeze in the later epochs, due to the policy of hold the line, will be countered by habitat growth in the middle reaches. It would be helpful if the gains and losses of intertidal habitat were calculated.’ **RSPB***

*‘Proposals to allow managed realignment in policy units E4 08, E4 09, E4 10 and E4 11 could create problems along our frontage (E4 13). The result could be more rapid deterioration of the historic masonry revetment around St Mary’s Island. This could increase the maintenance required and shorten the life expectancy of the revetment. Please include reference to the possibility of mitigating measures being necessary around St Mary’s Island as a result of any managed realignment upstream.’ **Chatham Maritime Trust***

Client Steering Group Response

Please refer to the CSG response given in Section B7.2.6 – Environmental Issues.

Further studies (identified in the Action Plan), concerning managed realignment upstream of St Mary’s Island, will involve an impact assessment which will assess these potential impacts. Words will be added to the implication table – Historic Environment (E4 13) highlighting potential impacts on the historic revetments with policies of managed realignment upstream.

E4 14 – The Strand to West Motney Hill

*‘The indicative line for managed realignment at Walnut Tree Farm includes land outside the indicative floodplain that is higher ground. The realignment could be to the higher ground which would mean a shorter flood defence line and less impact on the Country Park. It is surely not economic to maintain the long defence line around Horrid Hill. Why is the preferred policy in the first epoch hold the line for this stretch, when realignment is proposed in the first epoch for more important parts of the SPA? The habitat on Horrid Hill does not support SPA species so there would be no freshwater habitat compensation needs arising from realignment.’ **RSPB***

Client Steering Group Response

The SMP only shows indicative Managed Realignment extents, further studies (at Strategy Level) will be required to investigate and define the alignment of any defences along this frontage. With regard to Horrid Hill, it is agreed that it is not economic to maintain the defence line around Horrid Hill and therefore it is identified as a potential area for realignment. However, hold the line is proposed for the first epoch to allow further studies to investigate managed realignment with regards to infrastructure constraints and potential contamination issues at Horrid Hill.

E4 15 – Motney Hill to Ham Green

'Support is given for "Hold the Line" at the head of Otterham Creek....Support is given for the re-routing of shoreline Paths. We have concerns at the potential loss of parts of designated ecologically important habitats and agricultural land. We understand that where such losses occur, the Environment Agency and others are required to provide compensatory habitats – however it is noted with some disappointment that the islands of the Medway Estuary are not to be protected, which would have formed, potentially, these compensatory areas.' **Upchurch Parish Council**

'The RSPB supports the policy of managed realignment with localised hold the line, provided that the tests in Regulation 49 of the Habitats Regulations are met. The RSPB supports managed realignment here, because the indicative realignment line retains a significant proportion of the freshwater grazing marsh at Horsham Marsh. There would also seem to be potential for the lost freshwater grazing marsh to be recreated adjacent to the existing SPA within this policy unit. This would ensure that the coherence of the SPA is maintained and the requirements of Regulation 53 of the Habitats Regulations are met.' **RSPB**

'The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.' **Natural England**

Client Steering Group Response

The long term policy for the Medway Islands is no active intervention, which will allow the continuation of natural erosion and periodic inundation of the islands. The islands would not be suitable as compensatory habitat for loss of internationally designated habitat as they are already designated themselves and it would be unsustainable and uneconomic to protect the islands under a scenario of increasing sea level rise.

Text will be added to the implications table for this unit indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 16 – Ham Green to East of Upchurch

'We would like to seek clarification about the rights of the owners of isolated properties e.g. compensation. We would like to seek clarification about the rights of houseboat owners affected by the SMP proposals. We regret that no mention is made of the need to re-route footpaths, this case The Saxon Shoreway. We have concerns at the potential loss of parts of designated ecologically important habitats and agricultural land.' **Upchurch Parish Council**

'The RSPB supports the policy of no active intervention. However, the table detailing the implications of the plan for this location states that coastal squeeze will start to act in 50-100 years. This loss should be included in a balance sheet of gains and losses of habitat in the Appropriate Assessment required under the Habitats Regulations.' **RSPB**

Client Steering Group Response

Please refer to the CSG responses given in Section B7.2.8 – Compensation Issues, and Section B7.2.6 – Environmental Issues.

Text will be added to the implications table to reflect the requirement to re-route the Saxon Shore Way footpath.

E4 17 – East of Upchurch to East Lower Halstow

'The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.'

Natural England

Client Steering Group Response

Text will be added to the policy unit implications table indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 18 – Barksore Marshes

'The RSPB is concerned about the scale of loss of grazing marsh resulting from the policy of managed realignment in this unit. The tests in Regulation 49 of the Habitats Regulations must be met before the policy can be approved, and compensatory habitat must be provided. It is not clear where or whether compensatory habitat could be provided to maintain the coherence of the SPA.' **RSPB**

'The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.'

Natural England

Client Steering Group Response

Please refer to the CSG response given in Section B7.2.6 – Environmental Issues.

Text will be added to the implications table for this unit indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 19 – Funton to Raspberry Hill

'The RSPB supports the policy of no active intervention. However, the table detailing the implications of the plan for this location states that coastal squeeze will start to act in later epochs. This loss should be included in a balance sheet of gains and losses of habitat in the Appropriate Assessment required under the Habitats Regulations.' **RSPB**

Client Steering Group Response

Please refer to the CSG response given in Section B7.2.6 – Environmental Issues.

E4 20 - Chetney Marshes

'The RSPB supports managed realignment at Tailness Marshes as no grazing marsh SPA habitat would be impacted and the need for compensatory habitat is avoided. The RSPB also agrees that it is more sustainable not to manage the defences around the island in this unit. However, managed realignment on the west side of the Chetney Peninsula impacts both the SPA and the freshwater compensatory habitat created as a result of the A249 Sheppey Crossing. If this realignment happens, both the SPA and the A249 compensatory habitat must be compensated to maintain the coherence of the SPA.' **RSPB**

'The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.'

Natural England

Client Steering Group Response

Text will be added to the implications table for this unit indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 21 – Kingsferry Bridge to Milton Creek

'There is a section of privately owned and maintained sea defence to the Ridham Dock property, which forms part of the overall coastal defence in this area. It is our understanding that this wall extends some 650m around the property boundary, and has a top of wall height in the region of 4.90m AOD, which offers a much reduced level of flood protection as compared to the adjacent local authority sea defences (which are generally 1 in 200 year standard at 2060). It is our understanding that the EA do not currently undertake any maintenance of this section of sea defence, as it is under private ownership. We also understand that there are other sections of EA maintained defences in this zone that currently do not meet the 1 in 200 year protection level for 2060. We feel that this situation, if not addressed, will compromise the ability to effectively implement the SMP strategy proposals being put forward in the long-term, and is something we would like to see developed in more detail once the SMP is adopted.' **RPS Burksgreen on behalf of Gazeley UK Ltd / Standard Life Investments**

'The table detailing the implications of the plan for this location states that coastal squeeze will start to act in later epochs. This loss should be included in a balance sheet of gains and losses of habitat in the Appropriate Assessment required under the Habitats Regulations.' **RSPB**

Client Steering Group Response

The SMP defines the recommended policy and suggests how policies could broadly be implemented. The level of defence is not however discussed within this high-level document, but will be considered in the subsequent and more detailed strategy and scheme studies.

Please refer to the CSG response on Environmental Issues given in Section B7.2.6.

E4 22 – Milton Creek

'The RSPB does not object to the policy of hold the line. Nevertheless, we would make the comment that the tables setting out the implications of the plan for this location states that there would be no loss of coastal grazing marsh. However, the habitat in this section is saline lagoon not grazing marsh.' **RSPB**

'In the event that further (ground water) abstractions are reduced in the area (E4 22) the risks of groundwater flooding are enhanced. This may have an impact on our ability to "Hold the Line to continue protecting the urban developments and low-lying floodplain" as it is quite possible that groundwater flooding may occur in the area 'behind the line' under certain groundwater level conditions.' **Environment Agency – Groundwater and Contaminated Land**

Client Steering Group Response

Text will be changed in the implications table to reflect the loss of 'saline lagoon' instead of 'grazing marsh'.

Text will be added to the policy unit statement to reflect that as a result of groundwater extraction, the ability to hold the line may be compromised by groundwater flooding behind the line under certain groundwater level conditions. This will also be considered at Strategy level, when determining the appropriate implementation of options.

E4 23 – Murston Pits to Faversham Creek

'The RSPB agrees that further investigations into managed realignment are appropriate, whilst holding the line in the first epoch. The indicative managed realignment extent at Teynham and Luddenham Marshes would retain significant SPA habitat landward of the new defence line. Therefore, the interaction between the intertidal and freshwater habitat use by birds would be maintained. Investigation would be needed into the requirement for compensatory habitat. For example, into whether it is possible to provide compensatory habitat that would perform the same functions for the SPA as the high quality habitat of the Kent Wildlife Trust Oare Marshes reserve that would be lost.'

RSPB

'The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.'

Natural England

Client Steering Group Response

Text will be added to the implications table for this unit indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 24 – Faversham to Nagden

'The FCC was pleased to note that the plan would protect the creekside and town of Faversham but would like further thought given to the implications for the quaysides and moorings and to the plans for the surrounding marshes.' **Faversham Creek Consortium management group (FCC).**

Client Steering Group Response

Implications for the quaysides and moorings and to surrounding marshes will be assessed at strategy level in an Impact Assessment. An Action Plan will be included with the final document which will include a prioritised programme of these future strategies and an outline of future schemes, coastal monitoring and other studies.

E4 25 – Shell Ness to Sayes Court

'The RSPB is seriously concerned about the proposal for realignment over the Swale National Nature Reserve (NNR), which would mean the loss of a very high quality part of the Swale SPA. The RSPB does not agree that this is the best place for managed realignment, particularly in the earlier epochs. The tests in the Habitats Regulations for there to be no alternatives and the policy to be in the overriding public interest will need to be met before managed realignment can be implemented. Compensatory habitat will also need to be provided. This will need to be created and ecologically

functioning before any losses occur. Given the quality of the habitat that would be lost, it would take longer for the compensatory habitat to reach the same quality.' **RSPB**

'Policy Units (E4 25) has the potential to result in major losses of agricultural land, which would directly affect our business and we would object to the proposals.' **F D Attwood and Partners**

'The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.' **Natural England**

Client Steering Group Response

Please refer to the CSG response given in Section B7.2.6 – Environmental Issues.

Following discussion regarding the concerns and objections received for the policy units along the south of the Isle of Sheppey, the CSG has agreed that the policies proposed met the most objectives and will be the most sustainable in the long-term. Therefore the CSG has agreed to keep the policies the same, but wish to reassure those people who may be affected by these policies that they will be kept informed and consulted fully at the next stage. The CSG would also like to reiterate that the extents shown are only indicative and the details of any realignment will therefore be assessed in further studies. These studies will also need to look at the implications of Managed Realignment throughout the Swale, to inform people and feed into Flood Risk Management Strategies.

Text will be added to the implications table for this unit indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 26 – Sayes Court to North Elmley Island

'Realignment on land immediately to the west of the Isle of Harty: The RSPB would support managed realignment in this section of the policy unit because it would not impact designated habitat. Therefore, realignment should happen here first, before any losses to the SPA are considered. Although the indicative realignment line does not appear to be significantly shorter than the current defence line, the cost of purchasing and managing compensatory freshwater habitat is avoided.'

RSPB

'RSPB Elmley Marshes: The RSPB strongly opposes managed realignment, at least in the short- to medium-term, at the RSPB Elmley Marshes nature reserve. This is one of the most important pieces of coastal grazing marsh in Kent and its loss would severely compromise efforts to rehabilitate breeding wader populations in the south east. It may be that with climate change and sea level rise, it becomes inappropriate to maintain this sea wall in the later epochs. However, given its quality this area should not be one of the first to be lost. Any realignment over the SPA would have to comply with the tests in the Habitats Regulations for there to be no alternatives and the policy to be in the overriding public interest. Compensatory habitat would have to be created, but it would be difficult and time consuming to replace this habitat, which has benefited from 32 years of high quality RSPB management. Realignment at RSPB Elmley Marshes is not needed on ecological grounds, at least currently. The intertidal part of the SPA is judged by Natural England as being in favourable condition and not suffering from the effects of coastal squeeze. The intertidal habitat at the western end of the Swale is being eroded but the eastern end is accreting, therefore there is no net loss to the intertidal habitat. All the while this is the case, there is no ecological justification for realignment over the landward part of the SPA. The RSPB questions the justification of realignment in this area on economic grounds. We understand that the realignment line shown on the maps is indicative only,

however, this new line is about 2.35km and the current sea wall 4.61km. Therefore, if the indicative realignment line is used, only 2.26 km of sea wall management would be saved, but around 88 ha of high quality grazing marsh would have to be bought and managed in perpetuity. The cost of land on Sheppey is currently around £5000 an acre. The economic appraisal in Appendix H shows that managed realignment is not economically preferable to Hold the Line in this unit, although the sensitivity testing appears to contradict this by saying that Hold the Line is more expensive than realignment. Either way, the economic case for realignment is marginal. The Appendix H assessment does not take into account the value of the freshwater habitat that would be lost or the cost of buying and managing compensatory habitat. If these were factored in, the economic case for realignment would be even more doubtful. Realignment at RSPB Elmley Marshes would have the greatest impact on breeding birds for which the Swale SSSI is designated.' **RSPB**

'Elmley Conservation Trust land: The proposed realignment immediately to the west of RSPB Elmley Marshes does not appear to make economic sense. The current sea wall is around 1.27 km and the indicative realignment line is around 1.03 km. Therefore, there would be only 0.24 km less sea wall to maintain, but 17 ha of high quality grazing marsh would need to be created. The proposed realignment at Elmley Hills at the far west of unit E4 26, however, does make economic sense, as the realignment would be to higher ground. This also offers a rare opportunity for a natural defence line rather than a new wall. As this part of the SPA was more recently created from arable land, it makes sense that it should be reverted back to intertidal before other parts of the SPA. However, the loss of wintering SPA wildfowl habitat needs to be justified in terms of the Habitats Regulations and compensatory habitat provided. Impacts on breeding wader SSSI habitat and Ramsar features need also to be considered.' **RSPB**

'Policy Unit (E4 26) has the potential to result in major losses of agricultural land, which would directly effect our business and we would object to the proposals.' **F D Attwood and Partners**

'Minster-on-Sea Parish council queries the policy being Managed Realignment. The costs involved in realigning the sea defences can be better spent on raising the existing walls.' **Minster-on-Sea Parish Council**

'The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.'
Natural England

Client Steering Group Response

Please refer to the CSG responses given in Section B7.2.6 – Environmental Issues and Section B7.2.7 – Economic Issues.

Following discussion regarding the concerns and objections received for the policy units along the south of the Isle of Sheppey, the CSG has agreed that the policies proposed met the most objectives and will be the most sustainable in the long-term. Therefore the CSG has agreed to keep the policies the same, but wish to reassure those people who may be affected by these policies that they will be kept informed and consulted fully at the next stage. The CSG would like to reiterate that the extents shown are only indicative and the details of any realignment will therefore be assessed in further studies. These studies will also need to look at the implications of Managed Realignment throughout the Swale, to inform people and feed into Flood Risk Management Strategies.

Text will be added to the implications table for this unit indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 27 – North Elmley Island to Kingsferry Bridge

'It is not clear why a policy of hold the line is proposed in the first epoch for this policy unit, when other parts of the SPA would be realigned over. The policy of managed realignment in the medium and long term would need to be tested for compliance with the Habitats Regulations and compensatory habitat provided. The Summary of the Plan and Justification (p.137) for this unit states that the southern section of the hinterland forms part of the Swale National Nature Reserve and the RSPB reserve. The National Nature Reserve is in fact the Elmley NNR, and the RSPB is further east, it is Elmley Conservation Trust land that would be impacted.' **RSPB**

'The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.'
Natural England

Client Steering Group Response

The Hold the Line policy is proposed in the first epoch in this unit to allow for further studies to be carried out regarding implications of Managed Realignment in relation to the essential infrastructure in the area (i.e. the A249 road and bridge and the railway line).

The text will be amended in the policy unit statement to reflect that the NNR is Elmley NNR and not the RSPB reserve. Text will also be added to the implications table for this unit indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 28 – Kingsferry Bridge to Rushenden

'It is not clear why a policy of hold the line is proposed in the first epoch for this policy unit, when other parts of the SPA would be realigned over. The policy of managed realignment in the medium and long term would need to be tested for compliance with the Habitats Regulations and compensatory habitat provided.' **RSPB**

'The need for compensatory freshwater habitat to be secured before it is lost needs to be highlighted.'
Natural England

Client Steering Group Response

The Hold the Line policy is proposed in the first epoch in this unit to allow for further studies to be conducted at strategy level, regarding the viability of Managed Realignment with regards to implications in relation to the essential infrastructure in the area (i.e. the A249 road and bridge, the railway line and sewage works) and potential contamination of land at the disposal site.

Text will be added to the implications table for this unit indicating that compensatory freshwater habitat will need to be secured before any designated habitat is lost. Further studies to investigate mitigation measures for loss of designated freshwater habitat will be identified in the Action Plan.

E4 30 – Medway Islands

'The RSPB agrees with a policy of no active intervention for the Medway Islands. It would be unsustainable and potentially ecologically damaging to build or raise sea walls around them. However,

the islands are important nationally and internationally for their breeding seabird populations. Burntwick Island is particularly important for Sandwich terns, black-headed gulls and Mediterranean gulls; Deadmans Island is important for little terns. Therefore, the RSPB supports the ongoing monitoring of the islands, which will aid the assessment of future management of the SPA to maintain its breeding sea bird populations.' **RSPB**

Client Steering Group Response

Monitoring requirements will be identified in the Action Plan.

B7.2.13 Implementation of the SMP

All comments received through the public consultation process have been thoroughly reviewed and considered by the CSG. The CSG has endeavoured to answer the issues raised in this document, however answers to some issues lie outside of the remit of the SMP. Where this is the case, the CSG have provided links to information and / or forwarded these concerns to the appropriate bodies for consideration.

Defra require an SMP to be in place to inform future decisions on shoreline management and the requirement for the SMP at this stage is to present policies in accordance with current legislation and policy. Following consideration of comments, in no instance has a case been identified to justify a change in any of the SMP policies presented in the original consultation draft. Alterations and additions to other sections of the SMP have been made, where necessary, in response to comments received.

An Action Plan will be included with the final document which will outline the steps required to ensure the SMP recommendations are taken forward in the intermediate term, both in planning and coastal defence, and identifies the need to initiate further studies, actions and monitoring to facilitate the implementation of the longer-term plan. Some actions may require decisions to be made at government level.

The final document will be made publicly available and will also inform planning committees.

Annex B1

Annex B1.1 Consultation Response Form

| |
|---------------------------------------|
| SMP CONSULTATION RESPONSE FORM |
|---------------------------------------|

Please indicate which Shoreline Management Plan you wish to comment on (tick box):

| | |
|---|--|
| Medway Estuary and Swale Shoreline Management Plan (SMP) | |
| Isle of Grain to South foreland Shoreline Management Plan Review (SMP) | |



Your views and comments will play an important part in the development of the SMP for both the north Kent coastline and estuaries.

If you have any comments on the Medway Estuary and Swale SMP or the Isle of Grain to South Foreland SMP Review, please complete this form and return it to: **South East Coastal Group, C/o Military Road, Canterbury, Kent. CT1 1YW** or email: smp@canterbury.gov.uk by the **7th September 2007**. An electronic version of the form can also be found at www.se-coastalgroup.org.uk which can be submitted direct via email.

Contact details – Comments received may be incorporated into the SMPs although personal details will not be published but may be kept on file.

| |
|-----------------------------------|
| 1. Name (and organisation) |
|-----------------------------------|

| |
|--|
| 2. Contact details (address, telephone number, email) |
|--|

| |
|--|
| 3. Comments (If necessary, please continue on a separate sheet and feel free to attach any supporting information to this form) |
|--|

Annex B1.2 Press Notice**ANNOUNCEMENT OF PUBLICATION OF DRAFT PLAN (Incl. ENVIRONMENTAL REPORT)****ENVIRONMENTAL ASSESSMENT OF PLANS AND PROGRAMMES REGULATIONS 2004****(SI 2004 1633 Regulation 13 2)**

The South East Coastal Group gives notice that the Consultation Drafts of the following Shoreline Management Plans covering North and East Kent have been prepared and are available for consultation:

Medway Estuary and Swale Shoreline Management Plan**Isle of Grain to South Foreland Shoreline Management Plan 1st Review**

The Shoreline Management Plan gives an overview of the coastal flood and erosion risk around the North and East Kent Coasts and sets out our preferred plan for sustainable management of coastal defence over the next 100 years.

An Environmental Report is included in each plan.

The Coastal Group invites the public and the consultees to express their opinion on the relevant documents. Members of the public may inspect (**inspection is free**) the relevant documents online at www.se-coastalgroup.org.uk or at the following Offices:

Medway Estuary and Swale SMP

| | |
|-------------------------------------|---|
| Environment Agency (Lead) | Endeavour Park, London Road, Addington |
| Medway District Council | Civic Centre, Strood, Rochester |
| Swale Borough Council | Swale House East Street, Sittingbourne |
| Tonbridge & Malling Borough Council | Gibson Building, Gibson Drive, Kings Hill, West Malling |
| Kent County Council | Invicta House, County Hall, Maidstone |

Isle of Grain to South Foreland SMP Review

| | |
|--------------------------------|--|
| Canterbury City Council (Lead) | Military Road, Canterbury |
| Dover District Council | White Cliffs Business Park, Dover |
| Thanet District Council | Cecil Street, Margate |
| Kent County Council | Invicta House, County Hall, Maidstone |
| Medway District Council | Civic Centre, Strood, Rochester |
| Swale Borough Council | Swale House East Street, Sittingbourne |
| Environment Agency | Endeavour Park, London Road, Addington |

Consultation commences on 14th May 2007. Forms are available online at the website above or via the organisations listed above for providing formal feedback on the draft plans. Opinions on the relevant documents must be sent to the following address by 7th September 2007:

South East Coastal Group, c/o Canterbury City Council, Military Road, Canterbury. CT1 1YW

Annex B1.3 Stakeholder Letter**Date XXXX**

Dear

Draft Plan Consultation for the:**Medway Estuary and Swale Shoreline Management Plan (SMP)
Isle of Grain to South Foreland Shoreline Management Plan (SMP) Review**

The Medway Estuary and Swale SMP and Isle of Grain to South Foreland SMP Review are currently undergoing a public consultation, and as you have been previously involved in their stakeholder engagement process, we would welcome your views and comments.

Please find enclosed copies of the Draft Plan Summary Leaflets and Consultation Response Forms for your information and use. Please feel free to distribute the materials to colleagues, members or other parties who you believe may be interested in the plans. Additional Consultation Response Forms, leaflets and SMP Posters are available to download at www.se-coastalgroup.org.uk for your use. The full plans are also accessible to review online at this address. In addition, hard copies of the full plans are available to view at the following locations:

Medway Estuary and Swale SMP

| | |
|---------------------------------------|---|
| Environment Agency | Endeavour Park, London Road, Addington, West Malling |
| Medway District Council | Civic Centre, Strood, Rochester |
| Swale Borough Council | Swale House, East Street, Sittingbourne |
| Tonbridge and Malling Borough Council | Gibson Building, Gibson Drive, Kings Hill, West Malling |
| Kent County Council | Invicta House, County Hall, Maidstone |

Isle of Grain to South Foreland SMP

| | |
|-------------------------|---|
| Canterbury City Council | Military Road, Canterbury |
| Dover District Council | White Cliffs Business Park, Dover |
| Thanet District Council | Cecil Street, Margate |
| Kent County Council | Invicta House, County Hall, Maidstone |
| Medway District Council | Civic Centre, Strood, Rochester |
| Swale Borough Council | Swale House, East Street, Sittingbourne |

If you have any comments on the above plans, please complete a Consultation Response Form (enclosed) and return it to: **South East Coastal Group, C/o Military Road, Canterbury, Kent. CT1 1YW** or email: smp@canterbury.gov.uk by the **7th September 2007**. An electronic version of the form can also be found at www.se-coastalgroup.org.uk which can be submitted direct via email.

Thank you in anticipation of your response.

Yours sincerely

Annex B1.4 Press Briefing Pack**Medway Estuary & Swale Shoreline Management Plan****Isle of Grain to south Foreland Shoreline Management Plan Review****BRIEFING PACK (Press)*****What is a Shoreline Management Plan?***

A Shoreline Management Plan (SMP) is a high-level, non-statutory, policy document planning the future management of the coastline and coastal defences. It promotes management policies into the 22nd century that achieve long-term objectives without committing future generations to unsustainable practices.

The South East Coastal Group have been developing two Shoreline Management Plans (SMPs) that cover the shorelines and estuaries of North and East Kent **(1) The Medway Estuary and Swale SMP; (2) The Isle of Grain to South Foreland SMP Review.**

Why do we need Shoreline Management Plans?**The Changing Coastline**

The coastline is undergoing constant change from the natural processes of waves, tides and winds. The amount of change depends on the driving forces, such as storms and sea level rise, and constraints imposed by geology and degree of human intervention.

Whilst these changes continue, social, economic and environmental pressures are increasing in coastal areas. Development on the coast and within estuaries drives a need for protection against coastal flooding and erosion. Building coastal defences is increasingly expensive and places stress on coastal recreation features and natural habitats that are often nationally or internationally important.

Climate Change and Sea Level Rise

Much of the present shoreline of the English Channel has been shaped by sea level rise following the last ice age. New studies show that sea level rise is rapidly increasing again due to climate change. This will result in significant changes to the coast, such as:

Greater frequency of storms;

Increased wave heights;

Increased erosion;

Increasing rainfall; and,

Increasing fluvial flows.

Increasing sea levels mean that coastal defences have to be larger, costing more money to maintain and making the consequence of a failure of defences more catastrophic to the people and places they protect. These defences frequently prevent the movement of coastal habitats which can cause a problem caused 'Coastal Squeeze' where important wildlife habitat is lost under rising water.

What does this mean?

The coastline is changing and it will not stay as it is. If we continue to defend into the future as we have done in the past, the result will be:

Hard defended areas becoming headlands;

Loss of intertidal areas and beaches in front of defences;

Increased stress on the shoreline, where beaches are lost and the coastline is more exposed to storms;

Increased flooding and erosion hazards; and,

The need for more substantial and expensive defences.

This means we need a 100 year plan to co-ordinate how the coast is managed and take the opportunity to get the best out of it.

North Kent Shoreline Management Plans

The two north Kent SMPs will set the policy for managing the coast. The Plans will identify how the estuary and coastal shorelines would be best managed over time to avoid negative effects (increased erosion and flooding affecting people, property and the coastal environment) and maximise the beneficial affects (better beaches, better habitats, flood and coastal protection) of coastal management.

We will be consulting on the draft Shoreline Management Plans for North Kent between the 14th May and 7th September 2007.

How to Get Involved

If you live near to, or have an interest in, the Medway Estuary, Swale or northeast Kent coast, we invite you to review the policies and would welcome your views.

Hard copies of the full Consultation Shoreline Management Plans and Supporting Appendices are available for review at the following locations:

Medway Estuary and Swale SMP

Environment Agency

Endeavour Park, London Road, Addington

Medway District Council

Civic Centre, Strood, Rochester

Swale Borough Council

Swale House East Street, Sittingbourne

Tonbridge & Malling Borough Council

Gibson Building, Gibson Drive, Kings Hill, West Malling

Kent County Council

Invicta House, County Hall, Maidstone

Isle of Grain to South Foreland SMP Review

| | |
|-------------------------|--|
| Canterbury City Council | Military Road, Canterbury |
| Dover District Council | White Cliffs Business Park, Dover |
| Thanet District Council | Cecil Street, Margate |
| Kent County Council | Invicta House, County Hall, Maidstone |
| Medway District Council | Civic Centre, Strood, Rochester |
| Swale Borough Council | Swale House East Street, Sittingbourne |
| Environment Agency | Endeavour Park, London Road, Addington |

The full SMP Document and Consultation Response Forms are also available to view and download on the South East Coastal Group's website: www.se-coastalgroup.org.uk

Summary leaflets of the plan and Consultation Response Forms will be available in council offices and main libraries in the two SMP areas.

You may post your comments to: South East Coastal group. c/o Military Road, Canterbury, Kent. CT1 1YW. or email: smp@canterbury.gov.uk

Please submit all feedback by the **7th September 2007**.

Annex B1.5 Local Authority Briefing Pack**Medway Estuary & Swale Shoreline Management Plan****BRIEFING PACK (Local Authority)****Part 1*****What is a Shoreline Management Plan?***

A Shoreline Management Plan (SMP) is a high-level, non-statutory, policy document planning the future management of the coastline and coastal defences. It promotes management policies into the 22nd century that achieve long-term objectives without committing future generations to unsustainable practices.

The South East Coastal Group have been developing two Shoreline Management Plans (SMPs) that cover the shorelines and estuaries of North and East Kent:

- 1. Medway Estuary and Swale SMP; and**
- 2. Isle of Grain to South Foreland SMP Review.**

The objectives of the SMP are:

- to define, in general terms, the risks to people and the developed, natural and historic environment within the SMP area over the next century;
- to identify the preferred policies for managing those risks;
- to identify the consequences of implementing the preferred policies;
- to set out procedures for monitoring the effectiveness of the SMP policies;
- to inform planners developers and others of the risks identified within the SMP and preferred SMP policies when considering future land use change and development of the shoreline;
- to comply with international and national nature conservation legislation and biodiversity obligations; and,
- to highlight areas where knowledge gaps exist.

Why do we need a Shoreline Management Plan?

The Changing Coastline

The coastline is undergoing constant change from the natural processes of waves, tides and winds. The amount of change depends on the driving forces, such as storms and sea level rise, and constraints imposed by geology and degree of human intervention.

Whilst these changes continue, social, economic and environmental pressures are increasing in coastal areas. Development on the coast and within estuaries drives a need for protection against coastal flooding and erosion. Building coastal defences is increasingly expensive and places stress on coastal recreation features and natural habitats that are often nationally or internationally important.

Climate Change and Sea Level Rise

Much of the present shoreline of the English Channel has been shaped by sea level rise following the last ice age. Approximately c.10,000 years ago flooding of the English Channel started as sea levels rose. At that time the channel was only a river but, within 2000 years, the entire English Channel had become a sea. For the last 8000 years sea level rise has continued, but at a much slower pace.

Recent studies show that sea level rise is rapidly increasing again due to climate change. This will result in significant changes to the coast, such as:

Greater frequency of storms;

Increased wave heights;

Increased erosion;

Increasing rainfall; and

Increasing fluvial flows.

Increasing sea levels mean that coastal defences have to be larger, costing more money to maintain and making the consequence of a failure of defences more catastrophic to the people and places they protect.

These defences frequently prevent the movement of coastal habitats which can cause a problem caused 'Coastal Squeeze' where important wildlife habitat is lost under rising water.

The SMP aims to provide a plan for addressing these changes in the best way possible for all interests.

What does this mean?

The coastline is changing and it will not stay as it is. If we continue to defend into the future as we have done in the past, the result will be:

Hard defended areas becoming headlands;

Loss of intertidal areas and beaches in front of defences;

Increased stress on the shoreline, where beaches are lost and the coastline is more exposed to storms;

Increased flooding and erosion hazards; and,

The need for more substantial and expensive defences.

This means we need a 100 year plan to co-ordinate how the coast is managed and take the opportunity to get the best out of it. The Plan will identify how the coastline would be best managed over time in order to prevent the loss of beaches and to best protect the people in coastal communities.

Medway Estuary & Swale Shoreline Management Plan

BRIEFING PACK (Local Authority)

Part 2

Local Authority Involvement

Development of the SMP has been led by a Client Steering Group comprising relevant members of the South East Coastal Group, technical officers and representatives from Local Authorities, the Environment Agency, Natural England and English Heritage.

SMP development has also been assisted by regular involvement of members representing each of the operating authorities (the councils and the Environment Agency), through an Elected Members Forum (EMF). This group comprised elected members from each of the councils (generally the relevant Cabinet Portfolio holder) and a representative from the Regional Flood Defence Committee. The EMF members have attended meetings with a remit to 'inform and comment on' the developing stages of the SMP thereby providing some degree of input into policy development, by those who will ultimately be adopting the policies. The EMF has met at key stages, providing a review and informal approval of development and outputs.

The SMP process has also involved approximately 60 stakeholder organisations at key decision points, through the formation of a Key Stakeholder Forum (KSF). Meetings with the KSF have been held to help identify and understand the issues, to review the objectives and set direction for appropriate management scenarios.

Shoreline Management Policies

The Plan will set the policy for managing the coast. There are four main policies available:

Hold the Line – Maintain the existing defence line;

Advance the Line – Build new defences seaward of the existing defence line;

Managed Realignment – Allow the shoreline to change with management to control or limit movement (*NOTE: only indicative extents are indicated in the SMP, exact extents will be the subject of future further study*); and,

No Active Intervention – A decision not to invest in providing or maintaining defences

The coastline of the SMP has been broken up into geographical areas, called 'Policy Units,' based on assessments of coastal processes and socio-economic issues.

The plan works over three different time periods 0-20 years, 20-50 years and 50-100 years and assesses the best policies for each unit for each time period. The Plan makes sure that the policies are coordinated and complementary over the whole coastline to avoid negative effects (increased erosion and flooding affecting people, property and the coastal environment) and maximise the beneficial affects (better beaches, better habitats, flood and coastal protection) of coastal management.

Possible contentious issues within the Medway Estuary and Swale SMP

Where Managed Realignment or No Active Intervention will potentially result in the **loss of property**:

E4 16: Ham Green to East of Upchurch – potential loss of 1 property and greenhouses in the long term (50-100 years) under a policy of **No Active Intervention**;

E4 05: Hoo Marina to Lower Upnor – loss of Scheduled Monument in the long term under a policy of **No Active Intervention**;

E4 25: Shell Ness to Sayes Court - loss of approximately 26 properties at Shell Ness under a policy of **Managed Realignment**; and,

E4 30: Medway Islands – loss of 2 Scheduled Monuments under a policy of **No Active Intervention**.

Where Managed Realignment / No Active Intervention will potentially result in the **loss of agricultural land**:

E4 04: Kingsnorth Power Station to Cockham Wood;

E4 08: North Halling to Snodland;

E4 09: Snodland to Allington Lock;

E4 10: Allington Lock to North Wouldham;

E4 11: Wouldham Marshes;

E4 15: Motney Hill to Ham Green;

E4 16: Ham Green to East of Upchurch;

E4 17: East of Upchurch to Lower Halstow;

E4 18: Barksore Marshes;

E4 20: Chetney Marshes;

E4 23: Murston Pits to Faversham;

E4 25: Shell Ness to Sayes Court;

E4 26: Sayes Court to North Elmley Island;

E4 27: North Elmley island to Kingsferry Bridge; and,

E4 28: Kingsferry Bridge to Rushenden.

Summary of Policy Units (Medway Estuary and Swale)

The following sections summarise the justification and impacts of the management plan.

E4 01 Grain Tower to Colemouth Creek

Grain Tower marks the eastern limit of the Medway Estuary and Swale SMP frontage and the boundary with the Isle of Grain to South Foreland SMP. The majority of the shoreline is dominated by nationally important industry (e.g. Grain Power Station and Thamesport Container Terminal) and is fronted by internationally designated intertidal habitat. The long term policy is to **Hold the Line** in order to protect the commercial and industrial assets as well as the associated infrastructure. Under this policy some localised coastal squeeze impacts will be experienced in later epochs. However, these will be countered by habitat growth within the middle reaches of the Medway estuary.

E4 02 Colemouth Creek to Bee Ness Jetty

Nationally important infrastructure (road, railway, pipelines and electricity cables), associated with industry on the Isle of Grain, runs close to the shoreline. The residential communities of Lower Stoke and Middle Stoke lie on higher land. A large area of saltmarsh (Stoke Saltings) has developed between Colemouth Creek and the Bee Ness Jetty and the intertidal area and some sections of freshwater habitat are internationally designated for their ecological importance. In this policy unit, the area of estuary habitats is increasing and this is important for the international designations. The long-term policy is **Managed Realignment with Localised Hold the Line**. This will allow the shoreline to realign to a more natural system where possible, but will continue to provide appropriate flood and erosion defence to most of the hinterland. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented.

E4 03 Kingsnorth Power Station

The Power Station and associated infrastructure dominating this unit is protected by flood embankments along the majority of the frontage. Jetties from the power station stretch out into the estuary and extend over a number of small islands. The mudflats and saltmarsh along the frontage, including Oakham Marsh Island, are internationally designated. The plan in the long term is to **Hold the Line** to protect the power station and reduce flood risk to other low lying areas. Although, habitats will be affected by coastal squeeze in later years this will be balanced by habitat growth in other parts of the estuary.

E4 04 Power Station to Cockham Wood

The hinterland contains low-lying agricultural land. The coastal grazing marsh, mudflats and saltmarsh are internationally designated. A marina and small residential community are located to the far west of the frontage south of Hoo St Werburg. The long-term plan is **Managed Realignment with Localised Hold the Line**. This will allow the shoreline to realign to a more natural system where possible, benefiting coastal habitats in some locations. This policy will continue to provide coastal defence to the Kingsnorth Power Station, Hoo Marina, residential communities and some areas of backing low-lying land. Shoreline footpaths (including the Saxon Shore Way) may need to be re-routed where Managed Realignment is implemented.

E4 05 Hoo Marina to Lower Upnor

This undeveloped coastline runs in front of the ecologically important Cockham Wood, geologically important cliffs and archaeologically important Cockham Wood Fort Scheduled Monument. The coastline in this unit is not currently managed. The long-term plan is to continue with **No Active Intervention** to maintain landscape value of the frontage by allowing continued natural erosion and rollback of the shoreline. It is considered unsustainable and uneconomic to protect the heritage feature

in the long term. Sea level rise will eventually threaten the Saxon Shore coastal footpath; however, there is an alternative route to the Saxon Shore Way that extends inland along this frontage.

E4 06 Lower Upnor to Medway Bridge

This coastline includes a dense urban area extending onto the shore, comprising of the residential areas of Lower Upnor, Frindsbury and Strood, the commercial and industrial area of the Medway City Estate and regionally important strategic links. The eastern section of frontage is less densely urbanised and is made up of smaller residential areas interspersed with recreational and nationally important heritage features. The long term plan is to **Hold the Line** to ensure continued protection to property and infrastructure from flooding and erosion. Under this policy some coastal habitats will be affected by coastal squeeze in later years. However, these will be balanced by habitat growth within other parts of the estuary.

E4 07 Medway Bridge to North Halling

The railway track follows the shoreline all along this frontage. The railway line separates the residential communities of Cuxton and North Halling from the narrow Medway channel and restricts the size of the floodplain. The long term plan is to **Hold the Line** to continue protecting the property and infrastructure from flooding and erosion. Under this policy the channel may deepen and erosion may become more prevalent as sea levels rise and fluvial flows increase over time. Larger more expensive defences may be required in the long term.

E4 08 North Halling to Snodland

The meandering narrow Medway channel is bordered by the residential communities of Halling and Snodland and pockets of freshwater habitat. The railway line, which is set-back from the river bank, crosses the floodplain. The long term plan is **Managed Realignment with Localised Hold the Line**. This will allow the shoreline to realign to a more natural system where possible, but will continue to provide flood defence to the residential communities of Halling and Snodland and some of the hinterland. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented.

E4 09 Snodland to Allington Lock

This coastline contains designated freshwater lakes (Leybourne Lakes) south of Snodland and urban communities along the remaining frontage towards Allington Lock. The railway line runs across the floodplain and along the shoreline near the historic village of Aylesford. The estuary channel narrows considerably towards Allington Lock. The short term policy (0-20 years) is to **Hold the Line** to continue protecting the freshwater habitats, built assets and flood risk areas. The long-term plan (20-100 years) is **Managed Realignment with Localised Hold the Line**. This will allow the shoreline to realign to a more natural system where possible, but will continue to provide flood defence to the urban communities and highly important assets. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented.

E4 10 Allington Lock to North Wouldham

This shoreline contains the historic settlement of Aylesford to the south and areas of agricultural land and freshwater habitats interspersed with small settlements to the north. The estuary channel is narrow along the whole frontage. Outline planning consent has been granted for a housing and community development (Peters Village) and a new Medway River crossing west of Peters Pit. The short term plan (0-20 years) is to **Hold the Line** by continuing to protect the environmental habitats,

agricultural land, property and flood risk areas. The long-term plan (20-100 years) is **Managed Realignment with localised Hold the Line**. This will allow the shoreline to realign to a more natural system where possible, but will continue to provide flood defence to the urban communities and highly important assets. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented.

E4 11 Wouldham Marshes

Wouldham Marshes is a low-lying area of agricultural land that rises to higher land and is located between the village of Wouldham and the Medway Bridge. A small number of properties are located on the higher ground. The whole frontage is designated as an Area of Outstanding Natural Beauty. In the long term a policy of **Managed Realignment** is recommended to allow the coastline to realign to a more natural system, whilst continuing to provide defence to the Medway Bridge, the village of Wouldham and isolated properties. Overall, the landscape value will be maintained. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented.

E4 12 Medway Bridge to West St Mary's Island

This shoreline is dominated by the dense urban areas of Rochester and Chatham that extend onto the shore. The residential and commercial frontages are interspersed with a number of river crossings and strategic links between the Medway Towns, Frindsbury and Strood, reflecting that these historic towns have been important major crossing points across the Medway since Iron Age and Roman times. The frontage is of considerable commercial importance (e.g. Medway Port and the potential Thames Gateway regeneration area at Rochester Riverside) and is of significant international heritage importance attracting large visitor numbers (e.g. Chatham Historic Dockyard). The long term plan is to **Hold the Line**. This will continue to protect urban communities and heritage assets from flooding and erosion. Under this policy some habitats will be affected by coastal squeeze, however, these will be balanced by habitat growth in other parts of the estuary.

E4 13 St Mary's Island to The Strand

The shoreline is dominated by the expanding residential area of St Mary's Island and the residential, commercial and recreational areas at Gillingham. The narrow intertidal mudflats along the eastern shoreline of St Mary's Island are nationally designated, whilst the intertidal mudflat and saltmarshes along The Strand are internationally designated. The long term plan is **Hold the Line** to continue protection of these developments from flooding and erosion. Habitats will be affected by coastal squeeze in later years, however, these will be balanced by habitat growth in other parts of the estuary.

E4 14 The Strand to West Motney Hill

The important recreation area incorporating Riverside Country Park, Motney Hill and Berengrave Local Nature Reserve, is backed by rising land along the majority of this shoreline. Intertidal mudflat and saltmarshes are internationally designated for their ecological importance. The short term plan (0-20 years) is to **Hold the Line** to continue protecting these recreational areas from flooding and erosion. The long term plan (20-100 years) is to implement a policy of **Managed Realignment** to allow the shoreline to realign to a more natural system. Shoreline footpaths (including the Saxon Shore Way) may need to be re-routed where Managed Realignment is implemented.

E4 15 Motney Hill to Ham Green

This shoreline includes Motney Hill, Otterham and the western and northern edge of the Upchurch peninsular. Part of the shoreline is an RSPB Reserve. Small residential communities at Otterham,

Upchurch and Ham Green are interspersed with agricultural land and freshwater marsh. Intertidal areas adjacent to the shoreline and freshwater habitat at Motney Hill and Horsham Marsh are nationally and internationally designated for their ecological importance. The long term plan is **Managed Realignment with Localised Hold the Line**. This will allow the coastline to realign to a more natural system where possible, but will continue to provide flood defence to assets and low-lying land. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented.

E4 16 Ham Green to East of Upchurch

The high land between Ham Green and east of Upchurch contains Grade 1 agricultural land and isolated properties. Intertidal saltmarsh and mudflat habitats are nationally and internationally designated for their ecological importance. The long term policy for this unit is **No Active Intervention** to allow natural erosion of the frontage. It is considered unsustainable and uneconomic to continue to protect the shoreline in the long term. Reactivation of soft cliffs will provide an additional supply of sediment to the estuary system. Erosion will eventually affect the Saxon Shore Way Coastal Path and reduce the integrity of one property along this frontage.

E4 17 East of Upchurch to East Lower Halstow

The shoreline comprises agricultural land, locally important nature conservation sites and the historically important village of Lower Halstow. Intertidal habitats are nationally and internationally designated for their ecological importance. The recommended long term plan is **Managed Realignment with Localised Hold the Line**. This will allow the coastline to realign to a more natural system where possible, but will continue to provide flood defence to assets and low-lying land. Shoreline footpaths (including the Saxon Shore Way) may need to be re-routed where Managed Realignment is implemented.

E4 18 Barksore Marshes

Barksore Marshes is a peninsular of agricultural land and freshwater grazing marsh with no property. The majority of marshes and intertidal habitats are nationally and internationally designated for their ecological value. Most of the frontage is low-lying with the exception of an area of higher land located to the south. The area is important for its landscape value. In the short term (0-20 years) the plan is to implement a policy of **Managed Realignment**. This will ensure that freshwater habitat is appropriately managed before a **No Active Intervention** policy is implemented in the long term (20-100 years). This policy will allow the shoreline to realign to a more natural system. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented.

E4 19 Funton to Raspberry Hill

The shoreline includes a small local road, backed by orchards. Intertidal habitats are nationally and internationally designated for their ecological importance. The long term policy is **No Active Intervention** to allow natural erosion of the frontage. The road will be increasingly affected by flooding and erosion.

E4 20 Chetney Marshes

Chetney Marshes is a large peninsular of low lying agricultural marsh that extends into the Medway estuary. The Swale runs along its eastern shoreline. The marshes are considered to be one of the most important wildfowl breeding areas in Kent. Intertidal habitat and some coastal grazing marsh are nationally and internationally designated for their ecological importance. The area is locally important

for attracting bird watchers and walkers. The whole area is important for its landscape. The long-term plan is **Managed Realignment** to allow the coastline to realign to a more natural system, but will continue to provide flood defence to the low-lying areas. Shoreline footpaths (including the Saxon Shore Way) may need to be re-routed where Managed Realignment is implemented.

E4 21 Kingsferry Bridge to Milton Creek

The Kingsferry Bridge and rail link to the Isle of Sheppey mark the northern limit of the frontage. Industrial and commercial assets are on the low-lying floodplain. Substantial developments have been proposed at Ridham Dock and Kemsley Fields. Coastal grazing marsh and intertidal habitats are of national and international ecological importance. The Saxon Shore Way follows the shoreline along most of this frontage. The long term plan is to minimise flood risk and protect developments, low-lying hinterland and ecological assets, by implementing a policy of **Hold the Line**. Although intertidal habitats may be affected by coastal squeeze in later years. This will be balanced by habitat growth in other parts of the estuary.

E4 22 Milton Creek

Milton Creek runs from Sittingbourne towards the Swale. A number of regionally important commercial and industrial assets are located close to the shoreline. The Saxon Shore Way and the Sittingbourne and Kemsley Light Railway run along parts of the Creek. Large residential and commercial areas are also located on the floodplain. Milton Creek is a local Site of Nature Conservation Interest and parts are internationally designated. The long term plan is **Hold the Line** to continue protecting the urban developments and low-lying floodplain.

E4 23 Murston Pits to Faversham

This long frontage runs along the southern shore of the Swale, and incorporates Conyer and Oare Creeks and the north-west section of Faversham Creek. The large expanse of floodplain, made up of agricultural land and grazing marsh, rises to high land in the south. A small number of properties are located on higher land and in the communities of Conyer and Oare. The intertidal and freshwater habitats are nationally and internationally designated. The area is locally important for attracting visitors to the Saxon Shore Way, which runs along the shoreline; and to a number of nature reserves and bird watching sites. Areas along the frontage are also important for their heritage and landscape value. In the short term (0-20 years) the plan is **Hold the Line** to protect the environmental and property and the low-lying floodplain. The long-term plan (20-100 years) is **Managed Realignment with Localised Hold the Line**. This will allow the coastline to realign to a more natural system where possible, but will continue to provide flood defence to residential communities and the remaining floodplain. Shoreline footpaths (including the Saxon Shore Way) may need to be re-routed where Managed Realignment is implemented.

E4 24 Faversham to Nagden

Nagden marks the eastern landward limit of the Medway Estuary and Swale Shoreline Management Plan, and the boundary with the Isle of Grain to South Foreland SMP. The shoreline runs along the southern and eastern sections of Faversham Creek. A large number of industrial, commercial, residential and heritage assets are located along Faversham Creek. Between Faversham and Nagden the character of the shoreline changes from urban to rural. The area is locally important for attracting visitors to the Conservation Area and historic town of Faversham. Intertidal habitats are internationally designated for their ecological importance. The long term plan is to **Hold the Line** to continue protecting the urban developments, historic assets and agricultural land.

E4 25 Shell Ness to Sayes Court

Shell Ness marks the boundary with the Isle of Grain to South Foreland SMP. The shoreline includes a sand and shell beach and spit, backed by nationally and internationally designated saltmarsh and low-lying coastal grazing marsh. The long term plan is to implement a policy of **Managed Realignment** to achieve a more natural system. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented. The spit will naturally roll back over time and the shoreline may slowly move landward, widening the estuary mouth.

E4 26 Sayes Court to North Elmley Island

The shoreline runs along the south of the Isle of Sheppey and forms part of the northern bank of the Swale. The large floodplain is made up of agricultural land and coastal grazing marsh. The intertidal habitats and freshwater marsh are internationally designated. The area is locally important for attracting visitors to the National Nature Reserve, the RSPB Reserve and Sayes Court Scheduled Monument. The long term plan is to implement a policy of **Managed Realignment** to allow the coastline to realign to a more natural system, whilst continuing to provide flood defence to the remaining floodplain. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented.

E4 27 North Elmley Island to Kingsferry Bridge

The shoreline runs along the north eastern bank of the Swale, and the south-west of the Isle of Sheppey. The Kingsferry Bridge and rail link to the Isle of Sheppey mark the northern limit of the frontage. The low-lying floodplain is formed of agricultural land and coastal grazing marsh. The intertidal habitats and marshes are internationally designated. A small number of properties at Minster Marshes and two local roads are set back from the shoreline. Part of the frontage also forms part of the Swale National Nature Reserve and the RSPB Reserve. In the short term (0-20 years) the recommended plan is **Hold the Line** to protect the ecological assets, infrastructure and low-lying floodplain. The long-term plan (20-100 years) is **Managed Realignment** to allow the shoreline to realign to a more natural system and provide flood defence to infrastructure and the low-lying floodplain. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented.

E4 28 Kingsferry Bridge to Rushenden

The Kingsferry Bridge and rail link to the Isle of Sheppey mark the southern limit of the frontage. An area of low-lying marsh leads to high land at Rushenden Dredging Disposal Site. Intertidal habitat and some marshland are internationally designated for their ecological importance. In the short term (0-20 years) the plan is to **Hold the Line** to continue protecting the low lying ecological assets and infrastructure. The recommended long-term (20-100 years) plan is to implement a policy of **Managed Realignment** to allow the shoreline to realign to a more natural system. This policy will also continue to provide flood defence to the low-lying floodplain, infrastructure and properties. Shoreline footpaths may need to be re-routed where Managed Realignment is implemented.

E4 29 Rushenden to Sheerness

Sheerness marks the western limit of the Isle of Sheppey and marks the border with the Isle of Grain to South Foreland SMP. This section of the shoreline comprises the urban areas of Rushenden, Queenborough and Sheerness. Intertidal habitats between Rushenden and north of Queenborough are internationally designated. The long term plan is **Hold the Line** to continue protecting the urban

developments. Habitats will be affected by coastal squeeze in later years however, this will be balanced by habitat growth in other parts of the estuary.

E4 30 Medway Islands

A number of saltmarsh islands are located in the middle estuary of the Medway. Hoo Saltmarsh Island is a dredging disposal site. Nationally significant Scheduled Monuments are located on Hoo Saltmarsh Island (Hoo Fort SM) and Darnet Ness (Darnet Fort SM). Nor Marsh Island forms part of Nor Marsh and Motney Hill RSPB Reserve. Island habitats are nationally and internationally designated for their ecological value. The long term policy is **No Active Intervention** to maintain the environmental and landscape value of the frontage by allowing natural erosion to continue and periodic inundation of the islands. It is considered unsustainable and uneconomic to protect the individual heritage features in the long term. An ongoing monitoring programme will be required to assess the future management needs of the islands. Habitats will be affected by coastal squeeze in later years, however, this will be balanced by habitat growth in other parts of the estuary.

Summary of Policy Units

(Isle of Grain to South Foreland SMP Policy units – Medway & Swale areas)

4b 01 Allhallows-on-Sea to Grain

This is a largely undeveloped low-lying area of international nature conservation importance. The recommended policy in the short term is to **Hold the Line**. In the medium and long term a policy of **Managed Realignment** is recommended. This will generate a naturally functioning coastline, reduce the impact of coastal squeeze and enhance the nature conservation value of the frontage.

4b 02 Garrison Point to Minster

A dense urban area dominated by the port and associated developments. The long term policy is to **Hold the Line**. This will protect the developments that extend to the shoreline edge throughout the frontage. However, in light of ongoing sea level rise the inter-tidal area will narrow and beaches will reduce unless they are artificially maintained.

4b 03 Minster Town

A dense urban area, developed to the edge of the low coastal slope, fronted by a shingle beach of amenity and tourism importance. A long term policy of **Hold the Line** is recommended. The policy will protect the frontage and prevent erosion of the seafront and its associated assets. However, in light of ongoing sea level rise the inter-tidal area will narrow and beaches will reduce unless they are artificially maintained.

4b 04 Minster Slopes to Warden Bay

An area of unprotected cliffs that are of national environmental and geological importance. The long term policy here is to allow natural cliff retreat under **No Active Intervention**. This policy will maintain the landscape and environmental quality of the frontage. However, there will be some loss of agricultural land and caravan parks and sections of the coastal footpath may need to be re-routed.

4b 05 Warden Bay to Leysdown-on-Sea

This unit covers the village of Warden Bay, and the low-lying areas of 'The Bay' and Leysdown-on-Sea. The short term plan is to recommend a combined policy of **Hold the Line** and **Managed Realignment**. In the medium and long term, the combined policy of **Hold the Line** and **Managed Realignment** will continue. Some inundation of the hinterland is anticipated at the Bay as the effectiveness of the toe defence at Warden reduces. This will allow the shoreline to respond naturally, reduce coastal squeeze and prevent uncontrolled flooding.

4b 06 Leysdown-on-Sea to Shell Ness

The frontage comprises a largely unmanaged sand and shell beach, which is backed by low-lying coastal grazing marsh. A policy of **Managed Realignment** is recommended. Although property and land losses are associated with this policy, this policy is considered to be sustainable in the long-term, on the basis that environmental and engineering benefits will be realised and that the flood risk will be managed.

4b 07 Faversham Creek to Seasalter

This is a largely undeveloped low-lying area of international nature conservation importance. The recommended policy in the short term is to **Hold the Line**. In the medium and long term (20-50 and 50-100 years), a policy of **Managed Realignment** is recommended. This will generate a naturally functioning coastline, reduce the impact of coastal squeeze and enhance the nature conservation value of the frontage.

Further Information

The draft SMP is to be consulted on for a three month period from 14th May 2007 to 7th September 2007.

Hard copies of the full Shoreline Management Plan and Supporting Appendices are available at the following locations:

Medway Estuary and Swale SMP

| | |
|-------------------------------------|---|
| Environment Agency | Endeavour Park, London Road, Addington |
| Medway District Council | Civic Centre, Strood, Rochester |
| Swale Borough Council | Swale House East Street, Sittingbourne |
| Tonbridge & Malling Borough Council | Gibson Building, Gibson Drive, Kings Hill, West Malling |
| Kent County Council | Invicta House, County Hall, Maidstone |

Isle of Grain to South Foreland SMP Review

| | |
|-------------------------|--|
| Canterbury City Council | Military Road, Canterbury |
| Dover District Council | White Cliffs Business Park, Dover |
| Thanet District Council | Cecil Street, Margate |
| Kent County Council | Invicta House, County Hall, Maidstone |
| Medway District Council | Civic Centre, Strood, Rochester |
| Swale Borough Council | Swale House East Street, Sittingbourne |
| Environment Agency | Endeavour Park, London Road, Addington |

Documents are also available to view and download on the South East Coastal Group's website:
www.se-coastalgroup.org.uk

Annex B1.6 SMP Poster

Medway Estuary and Swale

Shoreline Management Plan

Our shorelines are undergoing constant change from the natural processes of waves, tides and winds. Recent studies have indicated that there are significant changes occurring within our climate. These include: greater frequency of storms; increasing wave heights; increasing rainfall; and rising sea levels.

This means we need a long-term plan to co-ordinate how our coast is managed.

The Shoreline Management Plan (SMP) recommends policies which will determine how the shoreline of the Medway Estuary and Swale will be managed for the next 100 years.

The SMP covers the shoreline of the Medway Estuary and the Swale. The plan extends up the Medway to Allington Lock in Maidstone and along the Swale, from the eastern mouth at Shell Ness to Queenborough, as highlighted in the map below. We are now consulting the public on the recommendations of the plan.

If you live near to, or have an interest in, the Medway and Swale estuaries or north Kent coast, we invite you to review the policies and would welcome your views. The closing date for feedback is 7th September 2007.

Documents are available to view and download on the South East Coastal Group's website: www.se-coastalgroup.org.uk

Feedback on the plan can be provided via the website or on feedback forms available from the authorities listed below.

| | |
|---------------------------------|---|
| Environment Agency | Orchard House, Endeavour Park, London Road, Addington |
| Medway DC | Civic Centre, Strood, Rochester |
| Swale BC | Swale House, East Street, Sittingbourne |
| Tonbridge and Malling BC | Gibson Building, Gibson Drive, Kings Hill, West Malling |
| Kent CC | Invicta House, County Hall, Maidstone |

Leaflets summarising the plan's recommendations are available at the locations above and in local libraries throughout the Medway and Swale areas.

Annex B1.7 NFU Meeting (22nd August 2007) Minutes

| | | | |
|----------------|---|-------------|----------------|
| Project | Medway Estuary and Swale SMP, Isle of Grain to South Foreland SMP | Date | 23 August 2007 |
| | | Ref | |
| Subject | NFU consultation meeting | Page | 193 of 70 |

Venue Canterbury City Council, Military Road Office

Date held 22 August 2007

Present MS - Mark Smith – Environment Agency
 KM - Katharine Mathews – Environment Agency
 SM - Steve McFarland – Canterbury City Council
 NP - Nigel Pontee – Halcrow

JA - John Archer – NFU SE Regional Officer

KA - Kevin Atwood – NFU County Vice Chairman and farmer Seasalter – Faversham

RD - Richard Daw – Farmer in Sandwich Bay

JH - Jeff Holroyd – NFU Group Secretary for Swale

PD - Paul Dunn – Farmer in Lower Stour

MW - Mike Wellam – NFU Group Secretary for Isle of Thanet and Hythe

SM gave an overview of the work that had been undertaken so far to develop the SMPs. **Action**
 During consultation stage most comments had related to the losses of houses or agricultural land. The SMPs had been developed in line with Defra guidance for their production. The SMP had to respect certain constraints such as legally protected environments and coastal process sustainability etc. Another key aspect was ensuring that policies were robust in the light of uncertainties such as predictions about climate change and sea level rise.

MS stressed that the project team was keen to use the meeting to present information to the NFU so that they could make as full as possible contribution to the consultation process and make their views known.

JA said that the NFU recognised that balanced solutions were needed achieve sustainable flood risk management.

JA outlined general concerns of NFU:

1. Wanted to highlight importance of agricultural land – this was felt to be poorly recognised in the SMP process. Globally the amount of agricultural land in temperate climates was reducing. Agricultural land represents people's livelihoods. Loss of agricultural land was therefore a very emotive subject for
-

landowners.

2. That managed realignment for flood defence purposes used to 'get habitat creation by the backdoor'.
3. Compensation for loss of farmers land was critical – 'pay for what you take'
4. Concern that economic analysis was inaccurate using out of date land values and not accounting for the decoupling of subsidies. On the Pagham-East Head SMP, the NFU had been unable to get detailed calculations of cost benefit analysis used to justify 1500 ha managed realignment site.

KA said that the NFU believed that the value of agriculture was undervalued in the SMP because their had not been large numbers of farmers at the stakeholder meetings

MS outlined the approaches that had been adopted with regard to the above points:

1. Importance of Agricultural land

The stakeholder meetings had captured people's concerns about agricultural land and these had fed into the objectives that were used to choose the preferred SMP policy.

RD asked how agricultural land had been ranked.

NP explained the objective setting and appraisal work and said the NFU should look at this part of the SMP to see (i) that they were happy with the number of objectives relating to farming (ii) that the ranking accorded to each agricultural objective was reasonable. In terms of ranking, there were 4 levels from locally important features up to internationally important features. Policies were chosen on basis of achieving the highest number of high ranking objectives, not on basis of achieving particular objectives.

NFU

NP would send summary table of ranks for different objectives to NFU.

NP

PD said that it was unfair that flood plain which was originally farmland but had been built on, now was protected from managed realignment, whilst remaining farmland was earmarked for managed realignment for flood relief and habitat compensation to protect urban areas.

NP explained that Defra guidance required that certain legislative and market approaches were assumed to remain constant over the lifetime of the SMP. This was dealt with in the sensitively analysis appendix of the SMP. NP advised the NFU to look at this and if they felt that the value of agricultural land should be acknowledged as increasing in the future they should make this point in their consultation response to the MSP and also to Defra.

NFU

Ultimately Defra would have to approve any revised consideration of agricultural land.

2. Habitat creation

MS advised that certain habitats were protected under international law and therefore the protection of these sites into the future (100yrs) is a big driver for the SMP. Habitat Creation is one of the many issues and objectives of the SMP and is not given extra weighting. The issues & objectives tables are available for review in the SMP appendices on the website (CD issued to some attendees also).

KA asked how many areas of different habitat types will be lost across the SMP area?

MS said that the Swale was currently accreting and the work that had been done suggested that this would be likely to continue for the next 50 years (although this was subject to high levels of uncertainty). Coastal squeeze was therefore not an issue in the Swale.

KA clarified that the creation of habitat was not a key driver in the Swale.

MS said that the appropriate assessment that had been completed in draft in partnership with Natural England. To date the assessment has showed that the policies are viable although the scale of the indicative realignment extents may not be. The primary purpose of the SMP is to set Coastal policy and not to scale the effect of the policy although we have made efforts to do this to benefit interpretation. The schemes as defined at present were our best estimates based on knowledge at the present time. Further studies would be needed to refine their extent before any changes were made on the ground.

RD said that managed realignment was proposed in Sandwich Bay. What was the driver, for this if coastal squeeze and habitat loss were not important?

SM confirmed that in most open coast areas coastal squeeze was an issue.

KM clarified that the creation of habitats was not the only driver for choosing policies

KA clarified that if fresh water habitat was lost it would need to be compensated for?

MS said that in some cases a change to intertidal habitat might be viewed by English Nature as beneficial to the overall integrity of the site.

KA understood that this might be the case in some instances and that it would clearly depend on the exact proportions of habitats being effected. However, other land owners e.g. the RSPB and Kent Marshes Association may take a different view on the loss of freshwater habitat. KA stated that there the NFU were concerned that the proposed managed realignment extents were just the starting point, signalling the way for more and larger schemes in the future. KA clarified that if fresh water habitat were needed to be created on agricultural land then it would offer an opportunity to provide compensation to

landowners. KA felt that most landowners would accept a loss of land if they were paid for its loss, although there were likely to be some landowners who would not contemplate any changes to their estates.

3. Compensation

MS and NP explained that there was no automatic right to provide compensation to landowners were managed realignment or no active intervention were undertaken. However, if the land was required to undertake a habitat creation scheme then land may be purchased either by a flood defence operating authority or by a third party (e.g. a port). Agri-environment schemes were also possible where inter tidal habitat was created on farm land – although from landowners perspectives such payments were not felt to deliver enough benefits. There was general agreement that if compensation were clearly payable it would make the development of the SMP much more straightforward.

JA confirmed that NFU were lobbying nationally on the issue of compensation.

MS provide the NFU with the Environment Agency and Defra policy statements relating to managed realignment.

4. Economics

MS clarified the NFU concerns that the SMP had followed Defra guidance and had:

- (i) used latest Defra values on agricultural land (2005 uplifted for inflation @3%).
- (ii) discounted the land based on subsidies.

KA estimated that land values had increased by 40% over the last 3 years rather than the 9% due to inflation. KA accepted that the newer values for land could be used at the strategy level studies. RICS website had information of the latest land values.

NP will check the land valuation information used and check that the Savills source recommended by the SMP guidance is the same as the Defra source. If not then the Savills source will be used to comply with the Defra SMP guidance.

NFU will feed back the concerns over use of inflation and discounts for subsidies to Defra

The SMP project team led by SM on behalf of the SE coastal group will also feed these concerns back to Defra and will investigate the use of more up to date land valuations as required.

NFU

SM

NIP clarified that the role of the SMP was to highlight where flood and coastal erosion risk management policies needed to change in the future, before these things were looked at in more detail at strategy and scheme level. The level of economic studies done in the SMP

was necessarily high level.

JH stressed that to farmers a loss of land was a loss of livelihood. JH thought that farmers would be happy if they were paid for their loss of land. JH said that where sea defences had always been provided, then people expected this to continue.

PD asked for clarification of the final sign off by the Elected Members Forum (EMF).

MS and SM said that the EMF sign off the SMP when they have fully considered all technical information and consultation feedback. They consider the acceptability of the SMP and any further work required based on comments received during the consultation period.

PD asked for clarification of the Sandwich Bay strategy. A previous study had been considering option of raising the flood embankments or building a barrier across the River Stour – what was the progress on this?

KM clarified that the previous study had been merged with the coastal study to form the Pegwell bay to Kingsdown Strategy.

KA said there were a number of specific issues relating to managed realignment on Sheppey but most of these were related to the issue of compensation. KA commented that the SMP process tended to highlight the uncertainties rather than the certainties. This was alarming to landowners. The issue of the exact extent of managed realignment was a case in point.

NP said that the SMP team had worked hard to define sensible extents for the managed realignment areas given the available information at this stage. NP accepted that in areas such as Sheppey the potential for managed realignment on low lying land was very large.

KA said the proposed managed realignment extents near Shellness were still very large and caused concern to the landowners in that area.

Author Nigel Pontee

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Annex B1.8 Kent County Council: List of stakeholders who were sent public consultation leaflets.

Icklesham Parish Council/Rye Harbour Boat Owners Association
MYA
Access to Marine Conservation for All International (AMCAI)
Allhallows Yacht Club
Bayblast
Birchington Waterski and Wakeboarding Club
Bramley Associates
Britannia Aggregates Ltd/BMAPA
BTCV
Buglife - The Invertebrate Conservation Trust
Canterbury and Coastal Kent
Canterbury Christ Church University College
Canterbury Information Centre
CARES Ltd
CEFAS
Centre for Enterprise and Business Development (Canterbury Christ Church University)
Chatham Maritime Trust
Christ Church University College, Fisheries GIS Unit
City of Rochester Society
CMS
Conyer Cruising Club
Country Land and Business Association (CLA)
Natural England
CPRE MCA
Crown Estate Manager, Cluttons
Cruising Association
dialogue matters
Dover Harbour Board
Dover Port
Dyas Farms 1988 Ltd
East Farleigh Cruising Club
East Kent Maritime Trust & Goodwins Joint Action Group
East Kent Yachting Association
Ecology Research group, Canterbury Christ Church University College
English Heritage
Eurotunnel
Faversham Creek Wardens
Folkestone & Dover Water Services Ltd
Friends of North Kent Marshes
Gillingham Marina
Greenwich Peninsular Ecology Park
Greenwich Wildlife Advisory Group

Groundwork
GroundWork Kent Thames-side
Groundwork Medway Swale
Guardian Marine Training Services
Herne Bay & Whitstable Water Safety Committee
Herne Bay Sailing Club
HM Coastguard
HM Coastguard, MCA
Hoo Marina
Hoo Marina Berth Holders Assoc.
Hoo Ness Yacht Club
Hundred Of Hoo Sailing Club
Icom (UK) Ltd
JAWS
JAWS jet ski club
Jet Ski World
Jet Works
Kent & Essex Sea Fisheries Committee
Kent & Medway Biological Records Centre
Kent and Sussex FWAG
Kent Downs AONB
Kent Federation of Amenity Societies
Kent Field Club
Kent Fisheries Consultative Association
Kent Ornithological Society
Kent Police
Kent Wildfowling & Conservation Association
Kent Wildlife Trust
Kentish Stour Countryside Project
Kingfisher Angling Preservation Society
Kingsferry Boat Club
Lewis Ecology
London Port Health Authority
London Rivers Association
London Thames Gateway Forum
Lower Halstow Yacht Club
Lydden Valley Project
Margate Civic Society
MCA
Medway Cruising Club
Medway Motor Yacht Club
Medway Ports
Medway River Users Association
Medway Valley Countryside Partnership
Medway Yacht Club
Medway Yachting Association

MOD
MSEP Chair
National Farmers Union - South East Region
National Trust
Natural History Museum
Network Rail
NFU
North Kent Yachting Association
North West Kent College
North West Kent Countryside Partnership
North West Kent Countryside Project
North West Kent CVS
Northfleet North Ward, Gravesham BC
Offshore Environmental Solutions Ltd (OESL)
Old Gaffers Association
Pegwell & District Association
Personal Watercraft Partnership
Pfizer Ltd
Port of London Authority
Queenborough Fishermen's Association
Queenborough Yacht Club
Railtrack Southern
Ramsgate Port
Ramsgate Society
River Stour (Kent) Internal Drainage Board
River Stour Internal Drainage Board
RNLI - Gravesend
Rochester Cruising Club
Royal Engineer Yacht Club
Royal National Lifeboat Institution
Royal Yachting Association
RSPB
RSPB North Kent Marshes
RYA
RYA Southeast
Rye Harbour
Sandwich Bay Bird Observatory
Sandwich Bay Bird Observatory Trust
Sandwich Port & Haven Commissioners
Sandwich Port and Haven Council
Sandwich Town Council
SEE Regional Assembly
Sheppey Coastguard
Sheppey Yacht Club
Shoregate Wharf Sailing Club
South East England Development Agency

South East England Regional Assembly
Southern Water Services Ltd
Sport England
Sport England, South East Region
Strood Yacht Club
Sustainability Actions
Thames Angling Preservation Society
Thames Estuary Partnership
Thames Explorer Trust
Thames Gateway Kent
Thames Gateway London Partnership
Thames Landscape Strategy
Thames21
Thamesport
Thanet Coast Project
Thanet Nature Conservation Umbrella Group
The Churches Conservation Trust
Natural England
The National Trust
The River Stour Drainage Board
The Sandwich Project
The Varne Boat Club
Tourism South East
Tribal Voice Communications Ltd
University of Greenwich
University of Kent
Upnor Sailing Club
Upper & Lower Medway IDB
W.H. Moulard & Son / NFU
Warwick Energy Ltd
Kent Downs AONB Officer
White Cliffs Country Tourism Association
White Cliffs Countryside Project
Whitstable Fish Market
Whitstable Fishermen's Association
Whitstable Harbour
Whitstable Museum
Whitstable Society
Wilsonian Sailing Club
Kent Thameside Delivery Board
Port of London Authority
British Divers Marine Life Rescue
Environment Agency
Canterbury City Council
Kent County Council
University of Greenwich

Environment Agency

Swale BC

Medway Council

Kent Wildlife Trust

KCC Neighbourhood Forum (Thanet and Dover Districts)
