

North West & North Wales Coastal Group

North West England and North Wales Shoreline Management Plan SMP2

Annex B I I

Public Consultation Location Specific Responses and Comments: Sub-cell I I b

Ribble Estuary – 11b 1				
Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
PCR_3 North Meols Parish Council	<p>11b 1.3 Crossens Pumping Station to Hesketh Out Marsh West (Hundred End Gutter)</p> <p>Banks Marsh, seawall</p> <p>At present, because of EA's assessment of Banks as a high flood risk area with main cause of flooding inundation through the sea wall, Banks is suffering from both planning and insurance blight. It would appear that holding the line would maintain this situation, which we cannot allow to continue as the residents of the village want to be able to regenerate the village to ensure 'sustainability'. I think it imperative that the comments made by myself at the meeting be investigated so that the flood risk assessment can be reviewed and changed to lift the blight. I was discussing the meeting with a parish council colleague and he suggested another option, funding permitting, and that is to rebuild the older seawall as a second line of defence.</p>	Y with reserva tions	<p>Support for draft policy is acknowledged.</p> <p>The SMP recommends that studies are undertaken in the medium term to investigate Managed Realignment opportunities in the long term and implement where practicable. The suggestion of improving the old sea wall as a secondary defence, funding permitting, could be taken forward in the short term epoch and would not compromise longer term proposed policy. A new item will be added to the draft action plan.</p> <p>There is an action already recommended in the draft action plan (Action 11.1) to continue with improvements to flood risk maps and inundation modelling to provide improved flood warning service.</p>	Add new item to draft Action Plan for PU 1.3
PCR_75 RSPB	<p>11b 1.3 Crossens to Hesketh Outmarsh West</p> <p>- We are unclear why MR is not proposed earlier than the 50-100 years period, especially as HTL would only protect agriculture land. We would recommend bringing this Preferred Policy forward.</p> <p>11b 1.6 Hesketh Outmarsh East to White Bridge, Rufford</p> <p>- We are unclear why MR is not proposed earlier than the 50-100 years period, especially as HTL would only protect agriculture land. We would recommend bringing this Preferred Policy forward.</p> <p>11b 1.7 White Bridge, Rufford, to Old Railway Embkmt, Much Hoole Marsh (River Douglas right bank)</p> <p>- We are unclear why MR is not proposed earlier than the 50-100 years period, especially as HTL would only protect agriculture land. We would recommend bringing this Preferred Policy forward.</p> <p>11b 1.8 Old Railway Embankment, Much Hoole Marsh House to Hutton Marsh (Pilots Cottage)</p> <p>- We are unclear why MR is not proposed earlier than the 50-100 years period, especially as HTL would only protect agriculture land. We would recommend bringing this Preferred Policy forward.</p> <p>11b 1.13 Freckleton Marsh (West end of sewage works) to Naze Point</p> <p>- We are unclear why MR is not proposed earlier than the 50-100 years period, especially as HTL would only protect agriculture land. We would recommend bringing this Preferred Policy forward.</p>		<p>Due to the large number of MR opportunities in the Ribble identified in the draft SMP, multiple MR undertaken at the same time may have significant implications on estuary processes and therefore we have recommended a staggered MR approach throughout the estuary. In some locations MR is the draft policy for the medium term, while in others studies are recommended to take place in the medium term to look at further MR opportunities in the long term.</p> <p>Draft Action Plan item 11b 1.1 proposes an estuary wide study to further investigate and consult on plans for managed realignment..</p> <p>There are also a number of linked studies being undertaken to support the SMP, including a sediment study which will consider the implications of large scale MR in the Ribble.</p>	No action required
PCR_113 EA NW	<p>11b 1.12</p> <p>This policy unit seems too large to adequately identify managed re-alignment options. The policy of Hold the Line for all three epochs may restrict opportunities to promote wider re-alignment in the vicinity of Lea. Possible options are to split the policy unit or to place further emphasis on localised opportunities for managed realignment at Lea Marsh</p>		<p>MR was not considered appropriate for most of this frontage due to the significant area of development in the flood zone along eastern part of the frontage, and the risk of contamination due to the historic and authorised landfill sites located west of Lea Marsh.</p> <p>It was noted in the Environmental "justification" column of the draft policy statement that there may be localised opportunities for short to medium term MR adjacent to the creek at Lea Marsh an action to investigate / progress this was recommended in the draft Action Plan. This can however be further emphasised by additional text to the short term policy & the mapping can be revised not to include the creek.</p>	<p>Revise mapping not to include creek at Lea marsh.</p> <p>Add text to short term policy approach for 11b 1.2: "Investigate small Managed Realignment / habitat creation opportunity at Lea Marsh and implement if practicable."</p>
	<p>11b 1.13</p> <p>The policy is for managed re-alignment in the third epoch. There may be an economic argument for</p>		<p>The consultation draft policy does already allow for potential implementation in the second epoch as it says "Manage flood risk by</p>	No action required

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	<p>this to be brought forward to the second epoch. This would also promote the potential for Newton Marsh as a site for habitat creation, but we accept that stakeholder engagement would be required if the draft policy is to be changed</p>		<p>maintaining existing defences to an adequate standard. Undertake studies to investigate Managed Realignment opportunities in the long term and implement where practicable.”</p> <p>The SMP action plan recommends that an estuary wide study is undertaken to investigate various Managed Realignment opportunities in the long term and develop plans to implement where practicable to create a more sustainable defence alignment. Include coastal processes and habitats study; stakeholder consultation, more detailed economic appraisal; investigation of options for adapting paths and rights of way to coastal change.</p>	
	<p>11b 1.14</p> <p>It could be argued that the policy here should be no active intervention for the full policy unit. The map allows for re-alignment at Poolstream (Bush Farm Creek in the SMP) but this policy may not be necessary at the time of publication of the plan. Further discussion required.</p>		<p>Following response and follow up discussion with EA NW the policy has been revised to indicate no active intervention for the full policy unit.</p>	<p>Revise to the same NAI policy for the whole PU</p>
<p>PCR_13</p> <p>Individual, Lytham St Annes</p>	<p>11b 1.19, 1.20, 1.21</p> <p>What work / when to reinforce the dunes & access to the beach areas of St Annes? There are cuttings in the defences now to allow this access e.g. bottom of Highbury Rd, St Annes where dunes have been flattened to access beach sport shop. Why are these access(es) allowed without flood gates or other water flow controls?</p> <p>Clear & signed access points through dunes and similar protection to beach? Make these points into weatherproof footpaths with duck boards where required so they are likely to be used.</p> <p>Check by manned patrol at times of high tide / storm that floodgates or similar controls are closed (HM Coastguard?)</p>	<p>Y</p>	<p>Support for draft policy is acknowledged.</p> <p>Local management activities are beyond the scope of the SMP. However, we included two actions in the consultation draft Action Plan to help address these issues:</p> <ul style="list-style-type: none"> Revise flood maps to take account of potential for breach of the dunes. Develop dune management plan to define actions necessary to maintain conservation features of dunes whilst providing natural coastal defence. <p>Propose to add need to manage flood risk related to access cuttings through dunes.</p>	<p>Add “including management of flood risks from cuttings and / or access routes through the dunes” to draft action plan item 2.13</p>
<p>PCR_65</p> <p>Individual, Tarleton</p>	<p>Concerned about land drainage, agricultural land protection.</p> <p>Facilities for the drainage of inland water into the sea must be made available and maintained. Major outfalls are vitally important for land water to discharge from areas behind the embankments.</p> <p>If adequate outfalls are not provided, flooding to the land side of embankments will become a real possibility and a greater threat than inundation by the sea.</p> <p>The continued silting of the Ribble Estuary may prejudice the efficiency of land drainage gullies on the seaward side and a programme of regular inspection, maintenance and dredging of these channels needs to be in place.</p> <p>The importance of providing and ensuring the integrity of the outfall drainage channels for the protection of property, including Grade I agricultural land, must override any ecological or environmental factors. There can be no compromise on this due to the importance of protecting property and prime agricultural land.</p>	<p>Y</p>	<p>Support for draft policy is acknowledged.</p> <p>The issue with siltation of outfall channels has been raised in other areas. While it would appear efficient to agree a strategic approach to managing the issue on the designated sites with Natural England and other stakeholders, this needs to be addressed through an Action Plan item from the SMP.</p>	<p>Adding text to action 1.1 to include ‘Assess needs for intervention to manage land drainage in areas where saltmarsh accretion causes problems at outfalls’ (as already included in other policy areas throughout the SMP)</p>
<p>PCR_70</p> <p>Friends of the Estuary</p>	<p>11b 1.16, 1.17, 1.18, 1.19, 1.20, 1.21</p> <p>The shore defence seawall is breaking up. One reason is that trees (e.g. Sycamore) are now growing there. The prom railings and slope is old and has not been kept in repair and maintained. The footpath is breaking up quite badly and one area in front of Fairhaven Sand Dunes is sinking.</p>	<p>Y</p>	<p>Support for draft policy is acknowledged.</p> <p>Fylde BC is, jointly with Blackpool Council, developing a coastal strategy that will consider the long term management of the defences. The need to maintain the defences was noted in the draft</p>	<p>No action required</p>

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			SMP Action Plan,	
PCR_79 Individual, St Anne's	11b 1.19, 1.20, 1.21 Concerned by the lack of management of sand dunes.		Management activities are beyond the scope of the SMP. However, the draft action plan already included an action to help address this issue: <ul style="list-style-type: none"> Develop dune management plan to define actions necessary to maintain conservation features of dunes whilst providing natural coastal defence. 	No action required
PCR_139 Preston and District Wildfowlers Association	11b 1.9 <p>Preston and District Wildfowlers Association (PDWA) have been in existence since 1953. We have 110 full members plus a small number of junior members and around 20 “waiting list” members mainly from the local area. The Association is affiliated to the British Association for Shooting and Conservation (BASC), which is a national organisation representing sporting shooting and conservation of wildlife/habitats with over 130,000 members.</p> <p>PDWA own the sporting rights on the tidal saltmarsh known as Longton and Hutton Marshes. PDWA also have 81 years remaining of a lease of the sporting rights on the reclaimed land referred to at Location (Policy Unit) 1.9. We understand from the consultation that this land has been identified for possible managed re-alignment within 0-20 years.</p> <p>PDWA have managed part of this reclaimed land as a non-shooting wildfowl sanctuary area since the land was reclaimed. The area managed has a high conservation status and regularly holds significant numbers of both breeding and wintering wildfowl. In winter months there are often well over a thousand wildfowl present.</p> <p>PDWA also manage the adjacent area of previously reclaimed saltmarsh (to the North East) as a non-shooting wildfowl sanctuary area. As stated above we also own and exercise the sporting rights on the saltmarsh on the other two sides of the reclaimed land.</p> <p>Our wildfowling activities are strictly controlled by both legislation and the rules of the association. Our activities are also covered by a Consent from Natural England as the area concerned is within the SSSI.</p> <p>PDWA therefore already successfully manage and control the conservation and habitat of part of the area designated for re-alignment, and on the salt marsh on three of its four sides.</p> <p>We recognise the environmental (and flood prevention) benefits of returning this area to tidal influence and improving its current unfavourable status. PDWA are actively looking to become more involved in land management and habitat improvement projects (particularly development of new wetland areas), for the benefit of the local community, our members and nature conservation.</p> <p>PDWA are therefore willing (and wish to) be involved in any managed re-alignment of this area of land and to help with its future management. We would be happy to, for example, take on Higher Level Stewardship agreements with Natural England as part of our commitment to manage this area effectively. Natural England officially recognises the value of properly managed wildfowling to conservation.</p> <p>PDWA asks that the North West England and North Wales Shoreline Management Plan SMP2 consultation recognises the long standing and culturally important activity of wildfowling and the sensitive nature of the habitats over which wildfowlers shoot and that we have the opportunity to be directly involved with this exciting re-alignment project.</p>	Y	Support for draft policy is acknowledged. Include the Preston and District Wildfowlers Association as a stakeholder in future strategy / schemes and continue the discussions regarding Hutton marsh, PUI 1b 1:9.	EA NW, to note the need for more detailed consultation with PDWA.

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PCR_174 Natural England	With reference to Appendix J6 1.2 Sub Cell 11b section H (Hutton Marsh), it is stated that private upgrading of sea defences has caused some parts of the SPA to be in unfavourable condition and that it should be brought back under tidal influence. It may be necessary to refer to the timing of the upgraded work and the designation, to ensure that any work to bring the area under tidal influence is carried out in line with the conservation objectives of the site.		Response noted	Update Appendix J text accordingly
PCR_171 Sefton MBC	iii) The draft recommendations for Sub –cell 11.b1 and the predicted implications of the draft policies being adopted in this location are noted. While there are some predicted negative implications, on balance the implications are broadly positive. The draft recommendations and draft Action Plan are supported.	Y		No action required
PCR_205 David Borrow MP	I have been approached by my constituent, Mr Bob Foster of the above address. My constituent would like to know why Croston in West Lancashire has not been included in the North West England and North Wales Shoreline Management Plan. I would be grateful for your comments on the question my constituent has asked. I look forward to hearing from you soon.		Response letter has been sent, directly to MP, indicating that: The area at Croston, which Mr Bob Foster queries, is slightly inland of the River Douglas and therefore is not specifically mentioned in the SMP. However, the area is covered by Policy Unit 11b 1.7 and the flood risk to Croston has been considered as part of the evaluation of policies for that unit.	No action required
PCR_214 Individual Hesketh Bank	The draft SMP on the River Douglas or inland. REMADE (Lancashire County Council) has [proposed the] disused Southport to Preston Railway Bridge as a new crossing, could this gate be locked to stop fast flow tides, with a footway on top of the gates.		Details of the proposed new bridge and scope of design are beyond the scope of the SMP. The response will be passed on to EA NW, who would be consulted as land / defence owner / manager.	EA NW to pass comment to Area team.

St Annes to Rossall Point – 11b 2				
Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
PCR_26 Blackpool & Fylde College	Interested in sedimentation and the effects on birds with increased number of residents and tourists attracted to the seawall.	Y	Support for draft policy is acknowledged.	No action required

St Annes to Rossall Point – 11b 2				
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PCR_175 Blackpool Council (Planning)	<p>Concerns: Main Document: Page 24: ‘While the preferred policy for many of these areas is to hold the line in the long term, there may be a detrimental impact on tourism through loss of beaches at places such as along the North Wales Coast and at Blackpool, where it will become increasingly technically difficult to retain beaches as sea level rise causes coastal squeezes pressures’. – The Blackpool Local Development Framework (LDF) places great emphasis on the coast and beach as a recreational, environmental and economic asset, and any loss of beach would have a detrimental effect on the resort. As part of the LDF, the Blackpool Core Strategy emphasises the vital role the coast will play in the sustainable growth and regeneration of Blackpool. To ensure the beach remains a valuable asset, we would support future management options to sustain the beach, including the development of a long term beach management strategy.</p> <p>Main Document: Page 27: ‘promote use of the SMP2 recommendations in spatial planning of land use’ – Reference to the SMP2 will be included in the Blackpool Preferred Option Core Strategy.</p>		<p>Response noted.</p> <p>The SMP has recognised that it is likely to become increasingly technically difficult to retain beaches with sea level rise in the future. Therefore the SMP has recommended the need to develop a long term beach management strategy along the Blackpool frontage to deal with the long term trend in beach erosion in order to maintain the beach as a valuable asset.</p>	No action required