

North West & North Wales Coastal Group

North West England and North Wales Shoreline Management Plan SMP2

Annex B13

Public Consultation Location Specific Responses and Comments: Sub-cell 11d

Haverigg to Selker – I Id I				
Response from?	Responses	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
PCR_49 Copeland BC	Implications of nuclear new build and relationship with NPS statements to be completed by 22/02/10. Nuclear new build not included in plan since planning consent not appropriate during your consultation period by Jan 10th 2010.	Y	Support for draft policy is acknowledged. Nuclear new build proposals come under uncertainties such as 'increased development' in the Sensitivity assessment (Appendix H). As you mention, these proposals are in early stages and planning consent has not been given yet, therefore they have not been included in the plan. It should however be recognised that should these proposals go ahead, the SMP2 policy may need to be reassessed at the next SMP3 review.	No action required
PCR_73 Haverigg Residents Association Member	I Id 1.1 Agree with draft policies	Y	Support for draft policy is acknowledged.	
	I Id 1.2 Haverigg to Hartrees Hill - The notion that there is insufficient economic justification for new defences fails to take into account an expanding prison and proposed new wind farm adjacent to the (non-existent) sea defences. This was pointed out at the meeting in Barrow 19 June when corrections were agreed.	N	At the Barrow 19 June meeting it was questioned why the prison did not give an economic viability for defences. Halcrow explained that policy choice is based on risk and at present the dune system is accreting and according to the EA flood risk maps, the prison is at low risk from flooding from the open coast frontage. As the future behaviour and evolution of the dune system is uncertain, the action plan for this area has included an action to 'Undertake beach, dune and coastal defence asset monitoring in conjunction with Cell 11 Regional Monitoring Strategy to inform strategy and future SMP reviews'. It is also acknowledged that the EA flood maps used in the SMP appear to underestimate flood risks landward of dune systems in some cases and therefore there is another action to 'Continue with improvements to flood risk maps and inundation modelling' in this area.	No action required
	Additional info - A new wind farm will probably be constructed by PFR Renewables (a partnership with HMP Haverigg) on the land between the prison and the sea. Close monitoring of the erosion to the sand dunes is now imperative. The wind farm is to generate electricity for the prison and Haverigg village, the excess to be sold to the grid, proceeds come to the village so the project does have considerable economic importance to us.		This wind farm proposal has not been included in the plan as no planning consent is in place. The SMP can only consider schemes where planning permission is already in place.	No action required
	Since the correspondence with David Bechelli the public meetings concerning Kirksanton nuclear power station have been held. Documents produced at that meeting show that the Department for Energy and Climate Change are backing the application for this power station at this stage. The plans include massive sea defences and a dock to be built, which would drastically alter the SMP for the whole of the cell Haverigg to Selker. This has greatly increased the interest in the SMP and a number of organisations wish to be involved.		A number of assessments will have to take place before anything is built, including an EIA to investigate the impacts on the environment. These assessments will probably include much more detailed site specific studies than possible at the SMP scale. The site specific EIA will have to look at the SMP along with other plans and take into consideration the plans findings and recommendations.	No action required
PCR_161 Individual, Carlisle	I Id 1.4 Background: Individual owns the agricultural land at the most southern section of PU 1.4 immediately north of the Silecroft Beach car park. A section approximately 250m long. Type of sea defence: There are currently no defences apart from natural shingle and clay/sand bank. Sea defence relevance: The Section of shoreline immediately to the south has a public car park immediately behind with limited erosion. The shoreline to the north has land, which rapidly rises		Response noted. The individual should speak directly to the Local Authority and / or the Environment Agency. The proposal would probably require Planning Permission and consent from the Environment Agency. Provided the embankment is set well back from the shoreline it could have negligible impact on wider scale coastal processes and setting it back would also reduce the cost involved with maintaining such a 3 rd party defence.	Revise PU boundary to PU1.3/1.4, to include this area in PU 1.3. Revise draft policy for PU 1.3 to HTL (subject to private funding agreement).

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	<p>from the shorefront so that any erosion is limited to a localised area. The section of Shoreline adjacent to the property and part of the field immediately behind the boundary fence/wall is a natural raised bank, which currently protects the farmland and access roads inland. If the natural bank were to be breached it would have a substantial effect not just on my land but also on a substantial area of farmland inland.</p> <p>Sea defence condition: The natural sand/gravel/clay bank is currently not breached but likely to be breached in the 0-20 years period if no action is taken.</p> <p>Proposed option: No active intervention. Proposed action is sensible for the section north of clients land but may have far reaching consequences for clients land and for others inland</p> <p>Suggested option: To permit erection of private defences at southern end of Section I.4 linked to adjacent car park area. There should be no requirement for public expenditure.</p> <p>Summary: A short section, approximately 250m at the southern end of PU I.4 has no defences but if the existing natural bank were to be breached it would have far reaching consequences on agricultural land and access in land. Erection and maintenance of private defences to be permitted at the southern end of section PU I.4 linked to the adjacent car park. There should be no requirement for public expenditure.</p>			
<p>PCR_165</p> <p>Whicham Parish Council</p>	<p>I Id I.3</p> <p>Background: Whicham Parish Council own the public car park at Silecroft beach. The car park is extensively used by locals and visitors to the area being the principle tourist beach within the National Park. The car park is located at the northern end of PU I.3 and is approximately 300m long with access directly from the public highway and public toilet facilities.</p> <p>Type of sea defence: There is no formal sea defence with limited erosion occurring in recent years due to the natural gravel and clay bank forming the front of the car park area.</p> <p>Sea defence relevance: The car park area could potentially be washed away leaving no public parking facilities. The land immediately behind the car park is designated a Site of Special Scientific Interest and, therefore, could not be converted into an alternative car park. At the northern end of the car park there is access to the beach for the launching of small crafts. This facility provides access to the sea which is extremely limited elsewhere in South Cumbria.</p> <p>Sea defence condition: The existing natural bank is generally in good condition showing little signs of erosion apart from at the northern end where access is taken to the beach and this may require some remedial work to hold the line.</p> <p>Proposed option: No active intervention. The consultation proposes that private defences can continue to be maintained.</p> <p>Suggested option: In addition to the private defences the defences relevant to the car parking area should be maintained so that public enjoyment can be continued of the excellent Silecroft beach and the public facilities sustained.</p> <p>Summary: Silecroft beach is the principle beach of the Lake District National Park and access to it relies on the public car park adjacent the shoreline owned by Whicham Parish Council. If the natural defences were allowed to be breached the car park could potentially be destroyed, thereby precluding access to the public because there would be nowhere to park.</p> <p>Maintenance to be permitted to ensure the continued presence of the car park and toilet facilities.</p> <p>Haverigg to Silecroft. Comments upon the Plan.</p>		<p>Response noted. Following consideration of these and other information submitted during the consultation, the SMP2 policy for I Id I.3 is proposed to change to HTL, subject to private funding agreement, and necessary consents in all three epochs. The policy boundary at the northern end of I.3 should be revised to move it north to the area of higher ground. This is considered to have minimal impacts on coastal processes as it is located near a drift divide and the low cliffs would not yield much sediment even if they were allowed to erode.</p>	<p>Revise PU boundary to PU I.3/I.4, to include this area in PU I.3. Revise draft policy for PU I.3 to HTL (subject to private funding agreement).</p>

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	<p>i) The policy of No Active Intervention (N.A.I.) would appear generally to be a correct one since the coastal protection further north (at Bootle) was destroyed in a storm and a similar thing could happen to defences along here. The current defence at the shore properties is private but is only estimated to have a residual life of 20 years. Again, N. A. I. would seem to be the best option for this area could not be protected in isolation.</p> <p>ii) We can never under-estimate the power of the sea and we do agree with the plan, however pertaining to Silecroft car park and toilets we need to re-think perhaps where the toilets should be because at the moment they are vulnerable.</p> <p>iii) The whole of Whicham Parish's coast line in South West Cumbria has been declared an area of 'do nothing' and 'let nature take its course', with the house owners being denied the right of defending their own property at their own expense.</p> <p>This decision has been taken by committee members from afar, advised by faceless accountants and bureaucrats who are only interested in saving money, leaving the losses with the private individuals. The State is, effectively, robbing the owners of their capital, without compensation, which is against British justice.</p> <p>We have another ethical problem in this Parish with the proposed nuclear power station at Kirksanton. Will that be allowed to build sea defences, while private property is denied the right to defend itself?</p> <p>Summary.</p> <p>Following discussion of the Shoreline Management Plan 2, Councillors of Whicham Parish would make the following observations:-</p> <p>a) it is acknowledged that there is a finite sum of money available for coastline protection in the U. K;</p> <p>b) it is understood that protection in one zone may have a detrimental effect to an adjoining one;</p> <p>c) also, it is recognised that piece-meal protection may well be worse in the long term than no protection at all;</p> <p>d) in many, if not most, areas the policy of No Active Intervention (N.A.I.) is probably the best one, letting nature take its course when no immediate damage is likely to occur.</p> <p>The Councillors have concerns, however, regarding various matters.</p> <p>i) If one local area is not to be protected yet is low-lying and, should it be breached, then surrounding areas would be affected would it not be sensible to allow this area to be defended?</p> <p>ii) To the North and outside of this Parish there is the M.O.D. gunnery range. Is this property to be allowed to have sea defences? If so, what will be the likely effect upon the road to North and to South of the range?</p> <p>iii) Should a Nuclear Powered Electricity Generating station be constructed to the South of this Parish, will that be allowed sea defences?</p> <p>iv) At Silecroft beach, to the rear of the car park is a Site of Special Scientific Interest (S.S.S.I.). This may make it impossible to 'roll back' the car park, which is well used in the summer.</p> <p>v) There is a national policy of encouraging tourism and this is a major employer in Cumbria. Tourists need toilets and those facilities at Silecroft are the only ones between Millom / Haverigg and Ravenglass. May these not be defended?</p> <p>vi) To the Councillors it does seem somewhat perverse that, basically, no protection is to be allowed</p>			

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	<p>along this stretch of coast. If individuals / organisations / companies are prepared to pay for, supply material for, erect defences then surely they ought to be encouraged. Assistance in these instances by way of advice, encouragement, sea and wave flow analyses is surely preferable than leaving things 'as is'? They could then be advised as to whether the defences proposed are feasible.</p> <p>vii) As with many parts of the U.K. there is a number of sites of early settlement, field patterns, cairns and so on. Many of these will be at risk if no intervention is the norm. What is the policy with regard to these sites?</p>			

Selker to Eskmeals – I Id 2				
Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
<p>PCR_93</p> <p>Individual, relation of Eskmeals resident</p>	<p>I Id 2.1</p> <p>I am the daughter of XXXXX who jointly owns Well Cottage (with her brother's family), on the coast at Eskmeals, next to Stubb Place. My grandfather 1st bought the cottage before I was born and my family and I have always spent time there every year. It is important to our family heritage and I now take my children there regularly.</p> <p>I understand that there is a consultation exercise in force about the coastal management proposals and I wanted to respond formally to the process. Obviously my family will be considerably affected by the outcome of the plan. I have looked at the proposals on the web site and note that basically no management is proposed although it is accepted that in due course the Eskmeals road will be lost and it seems to suggest re-building the road further inland, presumably through Stubb place, and active farm.</p> <p>I wish to object to this course of action, which I feel totally overlooks the interests of the residents.</p> <p>In the time that I have been staying at Well cottage (40 years), I can recall considerable erosion. 20-30 feet of field in front of our property has been lost to coastal erosion and we have re-situated the fence a number of times. I recall the compulsory purchase of land for a toilet block on the front and the subsequent erosion of this to the point that it had to be removed. It must be realistic to expect that if nothing is done, in due course the cottage will disappear and we will lose this valuable asset and important part of our family history.</p> <p>I am not entirely clear of the criteria that are considered in reaching the plan but these seem to be social economic and environmental criteria. In terms of social criteria I must strongly object to the plan proposed. It will directly negatively affect the people living on this piece of coastline including my family, and I know that residents at Stubb Place are significantly concerned. I note also a plan in due course to rebuild the road inland, presumably through their working farm? This will have a significant negative impact on the people along this coast and socially is a disaster for the area. It must impact on their business.</p> <p>In economic terms I see it is suggested that it is cheaper to do nothing. However council tax is paid to your authority by those families along the coast including my own, and it is reasonable to think that your authority, responsible for coastal issues, will take steps to protect the property and economic and emotional well being of these families. We simply cannot afford to just lose this family asset and I am sure the same will apply to others. I note that at times defences have been applied in a spot way- e.g. baskets of stones on the corner where the toilet block was, but this seems instead to have just pushed the problem further along the coast, so that we lost more land on the other side of our field. I think also that the gun range may use their own defences and again this puts added pressure on our part of the coast.</p> <p>In environmental terms, the dunes at Eskmeals are a valuable nature reserve, which is currently protected. Therefore how can it be appropriate to say it should be left. Have any studies been carried out on the potential loss of habitat? I would be grateful if you would note these objections and feed them into the consultation exercise. I would also be grateful if you could keep me informed of the progress and outcome of the plan.</p>	<p>N</p>	<p>Government policy is to take a risk based approach to managing coastal change and flood risk. It is not possible or sustainable to defend everywhere. As noted in the response the impact of defending one location needs to be considered for adjacent frontages linked by coastal processes.</p> <p>The Environment Agency and Local Authorities have permissive powers to manage coastal and flood risks to communities and assets where it is technically feasible, environmentally sustainable and economically viable to do so. Investment in defences is subject to national prioritisation against outcome measures specified by central government.</p> <p>Prior to the SMP a previous study had identified that this section of coast was unlikely to qualify for national funding for coast protection and in the long term it would be cheaper and more sustainable to realign the road than to install coast protection measures.</p> <p>The draft Action Plan proposed that the Highway Authority and the MoD should consider the justification for and appropriate timing for relocation of the road at Stubb Place.</p> <p>Following review of additional information and consultation responses the draft No Active Intervention Policy is now proposed to change to Managed Realignment, with the policy unit boundary moved to the south of Stubb Place so that coastal risks at Stubb Place, Marshside and Eskmeals Range are considered together.</p>	<p>Clarify Action Plan to make it clear who will take responsibility for Stubb Place road and identify short term works as an urgent action. Add to action plan the need to look at flood / erosion risk issues with highway network</p> <p>Add action for Environment Agency to review beach management practices on adjacent frontage and need for consent for future work.</p> <p>Move boundary to south of Stubb Point and change whole frontage to MR, MR, MR</p>
<p>PCR_94</p> <p>Individual, Bootle</p>	<p>I Id 2.1</p> <p>The bottom line of the Selker to Eskmeals stretch of the report which is of any consequence to residents, workers at the Gunrange and members of the public is maintaining the integrity of the</p>		<p>See above comments.</p> <p>There is a conflict between building a seawall and the desire to retain the beach. The previous study indicated that coastal defences were</p>	<p>As above</p>

Selker to Eskmeals – I Id 2				
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	<p>road which reaches the beach at Stubb Place Farm and turns right to go past the gun range. That's all that matters. In fact the area of concern stretches from Selker to Marshside. From Marshside to Eskmeals the MOD look after their own defences and will continue to do so I'm sure. The area of most concern at the moment is the corner of the road at Stubb Place. This is slowly eroding away under the watchful eye of all the authorities concerned who have over the years done absolutely ZERO except commission Engineering Consultants at great expense to justify their decisions not to spend a penny on this road.</p> <p>The only money spent wisely on this problem was by QinetiQ, who using available plant and transport and brains and their own money, came up with the idea of buttressing the corner with available 2 ton concrete blocks off the MOD site which although not heavy enough to be used as stand alone defence, when laid in a decent brick bond fashion have kept the sea at bay from the corner for a couple of years. But this scheme needed annual (cheap) maintenance, which QinetiQ were prepared to perform but as far as I know, QinetiQ had their knuckles rapped for doing the job in the first place and were told I believe to leave the road alone since it wasn't theirs to tamper with. What sort of practical joined-up thinking is this? Somebody here hasn't got a clue.</p> <p>We are trying to protect the road here and the beach, and the houses at Marshside, and the access to the Gun range and visitors enjoyment of an excellent beach facility for surfers, fishermen, children, swimmers (yes, swimmers), sailors, photographers, picnickers, wormers walkers etc. They all come here. This beach is the ONLY beach in the Lake District National Park served by a road which is on a through route. I have observed hundreds of (welcome) tourists coming to this beach in cars with an open map on the passengers lap seeking out gems like this. This isn't the tourist trap of the Central Lakes but the West coast, where visitors have to be cajoled to visit. They'll not come to this magnificent beach if there is no road. The point I am trying to put across is that with very little effort and expense the road can be kept in one piece. From the corner to Marshside I proposed at the Bootle public meeting on the subject a while back that interlocking sheet steel piling was a viable cheap solution to protect the road and the beach. I provided costings, calculations and drawings. My efforts were poo-pooed by the engineer at the meeting, a Mr Hayward I think.</p> <p>Then last year it was reported in the Whitehaven News by Copeland BC when the 'Eskmeals Gunrange Road Threat' reared it's ugly head again that perhaps some form of sheet steel piling could possibly be used, starting at the corner and progressing North to Marshside as funds allowed. It made me mad reading that I can tell you. I am aware that most of the threat from the sea other than to the road is to farmland but no-one is going to critically suffer as a result of this.</p> <p>So could we forget about spending small fortunes on far away consultants and consider some decisive forthright thinking on preserving a little jewel in the Lake District's crown. Has no-one in Copeland Borough or The County Council got a sign over their desk which says 'A Stitch in Time Saves Nine' It's true you know and it worked for my Gran, always.</p> <p>We are concerned with the lack of basic defending of the shore road from Stubb Place corner to the south end of the MOD gun range approx 200m in length.</p> <p>On our particular section I Id 2 there is a 'spend no money' policy i.e. NAI. Farmland is at risk and is being lost now. Dwellings are at risk but it looks like we will be ok for 20-50 yrs. We can cope with this but what is going to make our quality of life miserable is the loss of our road, not just for residents but for Bootle as a whole. Something has to be done at Stubb Place corner. No road re-routing daft ideas. Save the corner and short stretch of road... please.. any of you.</p> <p>Also included supporting photo and article (PCR_110_111_112 & misc Silloth Workshop.pdf)</p>		<p>not viable in the long term.</p> <p>The draft Action Plan proposed that the Highway Authority and the MoD should consider the justification for and appropriate timing for relocation of the road at Stubb Place.</p> <p>Following review of additional information and consultation responses the draft No Active Intervention Policy is now proposed to change to Managed Realignment, with the policy unit boundary moved to the south of Stubb Place so that coastal risks at Stubb Place, Marshside and Eskmeals Range are considered together. The proposed policy of Managed Realignment will allow for short term works to be undertaken to slow the erosion until a longer term approach of setting back the road can be put in place.</p>	

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Silloth Meeting 26.01.10 Individual, Eskmeals	<p>I Id 2.1</p> <p>There is concern about the road at Stubb Point. It is the only road to the Eskmeals gun range. There are proposals in a report written by Bullens to move the road, however with little expense the road could be maintained. Also the Ministry of Defence bulldoze shingle up the beach in front of the gun range to protect the gun range but this has the effect of reducing shingle in other areas of the coast and exposing them to risk.</p> <p>Until 1905 the river Annas was diverted which made the shingle move to the north and it protected the coast. Now the river is not being diverted and there are no plans to do it because of Natterjack toads.</p> <p>The Bullens report said the road has to be maintained by the Highways Authority unless the sub-base of the road is eroding away. This seems to be a big let off. There was a suggestion that this is in the Highways Act. There was a feeling that the area around Stubb Point should be looked at again.</p> <p>QinetiQ have in the past put some concrete blocks at the point to protect the road which worked well which was done with their own money and machinery. However it is understood that they have now been told by the council to leave it alone.</p> <p>The policy needs to be looked at soon, as with a couple of good tides the road will be significantly under threat.</p>		<p>A healthy beach would be an important form of natural protection to this frontage and therefore beach management practices by QinetiQ need to be assessed alongside the issues at Stubb Place.</p> <p>As noted above, following consultation submissions the SMP policy is proposed to be revised to Managed realignment.</p>	As above
PCR_154 Individual, Eskmeals	<p>We write as house and landowners of the above address, at which Mr Warburton has lived since December 1969. He has been the Hon. Manager of the Eskmeals Dunes Nature Reserve (north of the Eskmeals Gun Range) for the Cumbria Wildlife Trust since 1972, and as a former employee of the MOD on the Range for 24 years – during which he served as their Conservation Officer – he has a long standing interest and knowledge of this area and its shoreline in particular.</p> <p>Our house is situated on the Monk Moors Estate (SD092925) and as such our only access to our home is via the road south, passing Marshside (aka 'Bootle Beach/Stubb Place) or under the Eskmeals Viaduct to the north (impassable during high tides). We have therefore had grave concerns over the past five years or so as repeated storm damage has progressively eroded the beach at Marshside, which was formerly a very attractive amenity much used by local people and tourists alike (hence, until recently, the presence of public toilets there).</p> <p>Over the past few years, severe on-shore winds coinciding with high tides have eroded the former shingle beach to the point where the sea has come over what was once a wide flat green area well above the high water mark, and deposited a large amount of shingle, seaweed, flotsam and rocks, rendering the road impassable until the tide receded and the road could be cleared. Ultimately this has resulted in the almost total disappearance of this grassy area, with the nearest erosion point now being just two metres from the seaward edge of the road. It is patently obvious that it isn't going to last much longer.</p> <p>It was therefore with great interest that we heard (only on the same morning) that a meeting was to take place at Muncaster Castle on Thursday 11 February, to discuss this very problem and others along the West Cumbrian shoreline. We attended with great hopes that something positive was about to be done, but alas, our hopes were soon dashed!</p> <p>We will start by reiterating our disgust (expressed at the meeting) at the lack of publicity for this meeting – an all-important one for many of us. To tell us that you had 'informed Parish Clerks' and that 'the Consultation Documents were available on your website' is both pathetic and insulting to those with such grave concerns as ourselves. Why were there no announcements in the two local papers 'The Whitehaven News' and 'Evening Mail', or on our local radio 'Radio Cumbria' which has a</p>		<p>Response noted.</p> <p>The Environment Agency and Local Authorities have permissive powers to manage coastal and flood risks to communities and assets where it is technically feasible, environmentally sustainable and economically viable to do so. Investment in defences is subject to national prioritisation against outcome measures specified by central government.</p> <p>The policies in the draft SMP, which covers a very large area of coast, took into consideration the local studies that had been undertaken since the last SMP was developed. It is therefore correct to say that previous studies had already indicated that in the long term it would be sensible to consider re-aligning the road rather than constructing large scale coast protection measures.</p> <p>Following review of additional information and consultation responses the draft No Active Intervention Policy is now proposed to change to Managed Realignment, with the policy unit boundary moved to the south of Stubb Place so that coastal risks at Stubb Place, Marshside and Eskmeals Range are considered together. The proposed policy of Managed Realignment will allow for short term works to be undertaken to slow the erosion until a longer term approach of setting back the road can be put in place.</p>	<p>Clarify Action Plan to make it clear who will take responsibility for Stubb Place road and identify short term works as an urgent action. Add to action plan the need to look at flood / erosion risk issues with highway network</p> <p>Add action for Environment Agency to review beach management practices on adjacent frontage and need for consent for future work.</p> <p>Move boundary to south of Stubb Point and change whole frontage to MR, MR, MR</p>

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	<p>notice-board of daily events. And just to remind you, not everyone has a computer, and those of us who do, don't spend all day searching for the latest news from Government Agencies!</p> <p>We were also appalled to be told that you fully realised that the meeting had been called at short notice, but then to be further told that the deadline date for responses was Sunday 14 February (leaving just one working day after the meeting) was both ludicrous and thoughtless. We sincerely hope that your assurances that responses received after this date will still be considered, will hold true.</p> <p>We were equally appalled by some of the statements made by the presenter of the meeting. His total failure to have plausible answers to virtually every question put to him resulted in a most unimpressive performance to say the least! And one which banished whatever confidence we had for the future. Most attendees felt the same.</p> <p>At the end of the day it seems that five main conclusions can be reached: -</p> <ol style="list-style-type: none"> 1. The decision has already been taken (albeit unofficially as yet) to 'let nature take its course' (No Active Intervention in the 'official speak' of your documents – but 'do nothing and save money' in ours!). 2. It has already been decided that this is the only feasible approach to take, since no money or willingness to act is available from any source in order to save the road from disappearing altogether in the very near future, no matter what effect this will have on the residents of Marshside Cottages, Monk Moors, and Falcon Place, not to mention the Gun Range itself, and the job prospects of its work-force. 3. Although this road is ostensibly the responsibility of the Highways Authority/ County Council, all such responsibility is terminated if the road doesn't exist! You must forgive us if we suspect that here we might have the real reason for the past years of inertia! 4. So far as the Government Agencies and County/Borough Councils are concerned, the response to the plight of the local people mentioned in (2) is "Tough. We have no money to help you and it's just an inevitable natural process"! 5. Any talk of 'relocation' of home/landowners is pure 'pie in the sky' official-speak. It means nothing. When pressed, the presenter had to admit that he had no idea who would or could implement such 'relocations', fund it, recompense displaced people for financial losses accrued since they would obviously be unable to sell their properties, or where they would be 'relocated'! It was all vacuous words to hide the truth – there is no money or willingness available to help us – but we are expected to continue paying our Council Taxes! <p>We now wish to make some salient points and ask some pertinent questions</p> <ul style="list-style-type: none"> • We were puzzled by the total silence of the MOD/QinetiQ delegation. Once the road goes, the Gun Range – one of the areas main employers and a defence establishment of national importance – would be totally cut off. Big wagons are unable to negotiate the Viaduct route, and all employees but one (who also lives at Monk Moors) have to travel in to work by car – on the road! So they of all people should surely have had something to say? <p>Two possibilities come to mind. Firstly they are well aware that it is their shoring up of the sea front along the entire length of their shoreline (by bulldozing the shingle into a high barrier) which has caused the trouble at Marshside (and on the Nature Reserve where it abuts the northern limit of the Range). These two points now take the full brunt of the tidal surges which are automatically channelled north and south during times of storms and high on-shore winds. If they were proved to be the reason for the current problems, this would obviously leave them wide open to compensation</p>		<p>Previous more local studies had already indicated that in the long term re-aligning the road would be economically preferred.</p> <p>It should be noted that the Highway Authority has powers to undertake coast protection work to protect highways from erosion if they can justify and afford to do so.</p> <p>Local Authority funding for capital works on coastal defences is funded directly from central government, not through Council Tax, although maintenance is. National expenditure is prioritised and as government targets focus on numbers of properties protected it is considered unlikely that Stubb Place will rank high enough to obtain funding.</p> <p>Defra has recently funded a number of coastal adaptation pathfinder projects and this includes an example of a buy and lease back. There is however no commitment to this as an ongoing policy yet, see http://www.defra.gov.uk/environment/flooding/manage/pathfinder/index.htm</p> <p>We are unable to comment on this. See response from MoD in PCR_186 below.</p>	

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	<p>claims from local people who can no longer sell their houses.</p> <p>The second option could be that a decision has been made to close the Gun Range completely. Whatever, as we say, their silence is puzzling and does little to reassure us. We have long wondered why the Range people themselves have done nothing to save the road, though we understand that when they made an offer to supply concrete blocks and labour to place them in position, this offer to help was actually turned down. Is this true? If so, by who? If something had been done immediately, albeit short term, when the first storm damage occurred, we wouldn't now be in the vulnerable position we now find ourselves in.</p> <ul style="list-style-type: none"> • It is surely obvious that even if a new road could be built behind Stubb Place Farm, this would take months, if not years to be agreed. There would also be nature conservation issues since the area concerned is the breeding ground for protected species such as Natterjack Toad, Badger, Royal Fern and Marsh Fern to name but a few. This winter it has even harboured a herd of Whooper Swans and countless waders. <p>The area is also an important Mesolithic archaeological site, so yes, there would inevitably be people contesting the road, leading to time delays while Public Enquiries are held. In the meantime the Marshside Road will almost certainly have gone – so what are we residents supposed to do if it happens overnight after a storm? Walk across the fields to reach the A595? And another thought for you – what if someone needs an ambulance or a fire engine urgently? Your decision to make 'No Active Intervention' could well result in loss of life. Are you prepared to let that happen in the full knowledge you could prevent it by replacing a short stretch of new gabions?</p> <ul style="list-style-type: none"> • It seems to us that under the banners of 'it's a natural process'; 'it is too expensive to do anything, even as a temporary measure'; 'no-one has any money to do anything; all the agencies supposedly involved in coastal protection and road maintenance, are abdicating their responsibilities because there is apparently no money available. One cannot help but think that things would be different if more homes and families were in danger of being marooned. <p>Just think of the quick money which (rightly) was made available after the Cockermouth/Workington/Keswick floods and for wars in Iraq and Afghanistan. If money could be found on that scale then, it is hard to believe that nothing could be done to save this very short stretch of road and people's homes and livelihoods. What is more, having taken legal advice, it would seem that once a Council has given permission for houses to be built, they are duty-bound to provide the services necessary to make these houses habitable. Evidently this includes road access. It is to provide such services that the Council (Copeland Borough) in our case, charges us Council Tax, and if they refuse to provide these amenities, then we are legally entitled to withhold our payments. Therefore, in this context we were somewhat amazed to hear the Highways Engineer who spoke at Thursday's meeting, say that when he found that he had materials left over which he could use to provide repairs and sea defences at Marshside Beach, he was refused permission to provide this help – in his own words 'by the NW. England & N.Wales Coastal Group'. Could you please confirm via our email address, that this was indeed the case?</p> <p>Finally, it is surely obvious that given last night's inconclusive meeting and the sentiments expressed, we local people who are most involved with this serious problem, are not going to lie down and simply 'let nature takes its course'. If the very Agencies, Councils and Government bodies we fund with our taxes, are unwilling to help, then we will be forced to act ourselves – and make it known to the media. We are in siege mentality and time is in the essence. Two more storms and the road will be gone. Immediate action is needed, and we have no more time for paper exercises, vacuous discussions that have no answers or even possible solutions. 'We have no money' is not an acceptable answer when peoples homes and livelihoods are at stake – so 'No Active Intervention' is</p>		<p>Response noted, Further investigation into the practicality of relocating the road is required, which will take time. The proposed revised policy of Managed Realignment will allow short term measures to be undertaken to keep the road operational while a longer term solution is developed.</p> <p>The thought is partly correct because allocation of funding does take into account the numbers of households at risk.</p> <p>We are unable to comment on this as it is beyond the scope of the SMP</p> <p>Copeland Borough Council's Flood and Coastal Engineer at that time refused Cumbria Highways permission to place waste material along the beach as this would effectively be fly tipping.</p>	

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	<p>simply not an option we are prepared to accept. It would seem that the Bootle Parish Council is also anxious to see the former amenity restored, and would like to see this happen so that they can furnish the Green with seats and picnic tables and ensure that there is a ramp and disabled access to what is a beautiful beach - one of the few in the Lake District National Park.</p>			
<p>PCR_158 Bootle Parish Council</p>	<p>Bootle Parish Council is strongly opposing the decision towards 'no active intervention' with specific regard to the area of coastline know as 'Stubb Place'. As our recently launched Community Plan highlights our beach is important to us and that road is crucial.</p> <p>No active intervention would result in the debris from this tarmac road falling into the sea over many decades, the construction of a new road would substantially increase our Carbon Footprint and waste vast amounts of public money.</p> <p>We have received strong support from our Community to manage this area of coastline with the intention of protecting the road. Bootle Parish Council has already received offers of suitable materials, machinery and labour to instigate a Community led coastal protection and beach improvement plan.</p> <p>Bootle Parish Council would therefore recommend a decision instead to 'Managed Re-alignment' in this 200 metre stretch to protect the road.</p> <p>We welcome the opportunity to discuss this urgent matter further and look forward to meeting with the decision making bodies concerned.</p>	N	<p>Following review of additional information and consultation responses including this one, the draft No Active Intervention Policy is now proposed to change to Managed Realignment, with the policy unit boundary moved to the south of Stubb Place so that coastal risks at Stubb Place, Marshside and Eskmeans Range are considered together. The proposed policy of Managed Realignment will allow for short term works to be undertaken to slow or manage the erosion until a longer term approach of setting back the road can be put in place.</p>	<p>Clarify Action Plan to make it clear who will take responsibility for Stubb Place road and identify as an urgent action. Add to action plan the need to look at flood / erosion risk issues with highway network.</p> <p>Add action for Environment Agency to review beach management practices on adjacent frontage and need for consent for future work.</p> <p>Move boundary to south of Stubb Point and change whole frontage to MR, MR, MR.</p>
<p>PCR_162 Individual, Bootle</p>	<p>I Id 2.1</p> <p>Background: own, live and farm at Stubb Place. The farm is located close to the shore with the public highway forming the boundary between the shoreline and the farm.</p> <p>Type of sea defence: The section relevant to the residents is the section immediately south of Eskmeals where the public highway runs parallel to the shore line. The shoreline has naturally eroded the land west of the highway leaving sections with no more than 2m of land between the tarred carriage way and the eroded edge. To reduce erosion stone filled gabions were installed some years ago but most of these have deteriorated partly due to lack of maintenance. At the southern end of the road a number of concrete blocks have been placed to form a defence. The remainder is natural gravel shingle.</p> <p>Sea defence relevance: The public highway provides access to part of the farm, which if not usable would necessitate a five mile trip by road each way. If the road were to be washed away the sea would begin to erode the farmland requiring a new boundary fence.</p> <p>The public highway provides the only means of access for large vehicles and all vehicles at high tide to Eskmeals Gun Range, a strategic defence facility. Eskmeals is a large employer in the area and if the loss of the road caused the facility to close all the jobs would be lost and the country would lose a vital testing range facility which it is understood not available any where else in the United Kingdom.</p> <p>Sea defence condition Lack of maintenance has allowed the gabions to become dislodged with the sea washing away the gravel behind. Some concrete blocks have been placed at the southern end and these have protected the road. It cannot be over emphasised that the road is potentially one very high tide away from being washed away as a result of the poor state of the defences.</p> <p>Proposed option: Allow defences to fail! No new defences. It is highly likely that the road will be washed away leaving all users with no highway until such time as a new road is constructed.</p> <p>A study to be made into creating a new road on land across Stubb Place farm. A study may well be a</p>		<p>Response noted, see above comments.</p> <p>The revised policy of managed realignment will allow short tem measures to be put in place while a long term solution is developed, as suggested.</p>	<p>See above.</p>

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	<p>prudent plan to resolve the long-term issue. A new road is likely to be extremely costly perhaps several million pounds and take some years from design to completion assuming funds can be found. In addition, dependant on the route selected, likely to sever parts of Stubb Place farm which will cause disruption to the movement of the dairy herd to their pastures.</p> <p>Suggested option: To strengthen the existing defences adjacent the road to maintain the highway for at least the next 20 years, which will allow proper consideration of the long term solutions. The funding of the suggested work could be co-funded by a partnership of Copeland Council and other affected parties with a financial interest in the existing roads retention. The cost of the proposed work is likely to be substantially less than the new road option and will maintain access for users.</p> <p>The proposed defences will be adjacent to the privately maintained defences of the Eskmeals Gun Range and should therefore not materially alter the affects on sediment movement or coastal processes.</p> <p>Summary: The no active intervention is not an option due to the likely imminent loss of the public highway with all the disruption to Eskmeals and other users.</p> <p>If a new road were to be built it may severely sever our farm, cost a substantial amount and leave the users without a road for years.</p> <p>The plan to allow defence of the road for at least the next 20 years.</p>			
PCR_176 Individual	<p>I Id 2.1</p> <p>Further to our telephone conversation regarding the recommendation not to repair any of the sea defences between Selker and Eskmeals I have the following observations:</p> <ol style="list-style-type: none"> 1) Historically there were always measures taken particularly at Stubb Place which were not particularly expensive but certainly slowed the rate of coastal erosion. 2) It would be more cost effective to maintain the gabion baskets than build a new unwanted road on a wet site. 3) Have the authorities considered the legal implications of land ownership? <p>The foreshore or inter tidal zone belongs to the Crown. If coastal erosion is allowed to be unchecked owners of freehold land will find they will lose title to their land without compensation.</p> <ol style="list-style-type: none"> 4) Why was the public participation process so unpublicised with a meeting held so far from the site and invitation letters sent out with some three working days notice? 5) Have the authorities considered using farmers with their enormous resources to participate in making good the sea defences. 6) Would the authors of the recommendations come to same conclusion if it was their land/home that was at risk? 		The observations are noted. As indicated in the above responses the proposed policy for Stubb Place is now proposed to change to Managed realignment, which will allow for short term measures to slow the rate of erosion whilst a longer term solution to adapt to coastal change is developed.	As Above
PCR_186 MOD	<p>I Id 2.1</p> <p>The Policy of NAI will mean the loss of a public highway at Stubbs Farm.</p> <p>As well as serving local residents the highway is the primary access to the MOD site known as Eskmeals Range</p> <p>The policy is based on the justification that realigning the road will be more economically viable. I am not aware that either the option of enhancing the coastal defences or the option of realigning the road have been fully costed. The MOD therefore does not believe that this can be considered</p>	N	Response noted. Following review of this information and other comments and submitted during consultation the consultation draft headline policy of No Active Intervention is proposed to change to Managed realignment. This will allow for short term works to protect the road whilst a long term solution is identified.	As above.

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	<p>suitable justification for this policy. This issue needs to be properly addressed before this policy is confirmed.</p> <p>In the short term the policy only allows basic maintenance of existing defences. It does not allow for any new defences to be constructed when existing defences fail. This can not be supported; it could be that enhancement of the existing defences could protect the public highway without impacting on the long term coastal management and at a cost more appropriate to the location. Intervention should be permitted as long as there are no adverse affects on sediment movement/coastal processes and it is sustainable to do so.</p> <p>Policy Unit I Id 2:1. Eskmeals Range Additional Information:</p> <p>The Ministry of Defence (MOD) Eskmeals range is located at Millom in the Borough of Copeland and is a key establishment for the conduct of the test and evaluation of land systems, including those for urgent deployment to operational theatres. The operation of the site is now at significant risk due to the threat of collapse of the main access road as a result of coastal erosion.</p> <p>The road is used for the transport of personnel, equipment and heavy vehicles on to and off the site and is the main access for the emergency services. The surface of the road is being steadily undermined and it is felt we are fortunate that the road survived last winter. It will not continue to be passable for much longer without protection works being carried out.</p> <p>As the position stands, the most likely outcome is that the road will be washed away, thus preventing access onto the site of heavy equipment and vehicles required for trials. This would have a severe operational impact as many of the activities currently carried out at Eskmeals could not be relocated elsewhere on the Defence estate without significant disruption.</p> <p>In the long term the loss of this highway could be a threat to the future of the site. It is therefore worthwhile pointing out the significant contribution that the establishment makes to the Cumbrian economy. Currently MOD Eskmeals employs more than 100 personnel (excluding local contractors engaged on an ongoing basis), pays more than £80,000 in Business Rates and also makes use of other local businesses to provide a wide range of goods and services. Taken together it is estimated that this expenditure amounts to some £2,400,000, while in addition, visitors to the site book almost 1,000 hotel rooms every year.</p> <p>It should also be noted that the MOD is funded for Defence purposes only and as such the MOD has no funding for work off the MOD estate and which is not solely for the benefit of defence.</p>			
	<p>I Id 2.2</p> <p>The Policy of NAI is not acceptable to the MOD is the area fronting Eskmeals Firing Range.</p> <p>Maintenance of the defences for the Range must be permissible for the future.</p> <p>While there are not any formal defences in this area any loss of real estate will be detrimental to the operation of the range. Hard facilities are maintained adjacent to the shore and the assumption that they can be “rolled back” in response to coastal change is unfounded and has not been tested by the MOD.</p> <p>A policy of NAI would have an adverse effect on maintaining the MOD’s capabilities. Consequently, the policy for this area should be to ‘Hold the Line’.</p> <p>Policy Unit I Id 2:2. Eskmeals Range</p> <p>Additional Information:</p> <p>The Ministry of Defence (MOD) Eskmeals range is located at Millom in the Borough of Copeland and</p>	N	<p>Response and additional information not previously submitted noted.</p> <p>We note that there are no formal defences in the area but responses from other respondents indicate that beach management practices are used to informally manage coastal change. As there are no formal defence is this area and it is adjacent to and integral with the sand dune system of the Internationally designated Drigg Coast Special Area of Conversation, introduction of new hard defences would require full environmental impact assessment and Habitats Regulations Approval for consent.</p> <p>We therefore consider that the most appropriate policy, in line with current practice would be Managed Realignment. This would allow present practices to be continued where necessary but would also allow for future testing of options to “roll back” hard assets or replace further inland when they reach the end of their residual lives in the</p>	<p>Move policy unit boundary to south of Stubb Place and change whole frontage to MR, MR, MR</p>

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	<p>is a key establishment for the conduct of the test and evaluation of land systems, including those for urgent deployment to operational theatres. Eskmeals is classed as a strategic site and any loss in capability will be detrimental in national defence terms. The operation of the site would be at significant risk if a policy of NAI was enforced in this area.</p> <p>If the site were to close the significant contribution that the establishment makes to the Cumbrian economy would be lost. Currently MOD Eskmeals employs more than 100 personnel (excluding local contractors engaged on an ongoing basis), pays more than £80,000 in Business Rates and also makes use of other local businesses to provide a wide range of goods and services. Taken together it is estimated that this expenditure amounts to some £2,400,000, while in addition, visitors to the site book almost 1,000 hotel rooms every year.</p> <p>The economic impact of the suggested policy does not appear to have been considered in reaching the policy recommendation and this should also be addressed.</p>		<p>medium or long term. It would also allow for future installation of localised hard defences at essential locations if necessary.</p>	
PCR_200 Individual Whicham	<p>Thank you for allowing this late submission, following discussions at Muncaster. The following policy should be adopted as it is against British natural justice for any body to have his property devalued by any authority without a system of appeal for compensation. "Where a Coastal Protection Authority decides that no protection will be given to a property, the owner must in principle be allowed to protect his own property on his own land at his own expense, subject to the consent of the authority. Where this consent is refused or unreasonable conditions put on the work so that the expense is too great to bear, the owner should have the right to appeal to the Lands Tribunal for compensation, plus costs, payable by the Coastal protection Authority, based on the value of the property had it been protected, less the cost of the works'. This principle would remove most of the objections to the proposed 'do nothing policy'.</p>		<p>Response noted.</p> <p>SMPs and their policies are Non-Statutory and so they do not override legal statute, such as the Coast Protection Act (1949), Landowners have the right to apply for consent to construct coastal protection works under the Coast Protection Act irrespective of the SMP. In most cases Planning Consents would also need to be applied for. The Coast Protection Authority and the Planning Authority would need to consider statutory requirements and procedure, and take advice from statutory consultees, but would also be expected to refer to the SMP in making their decision.</p>	<p>No changes proposed.</p>
PCR_204 Individual, Eskmeals	<p>We are writing to you concerning the current position of the North West England and North Wales Coastal Group in respect of the coastline at Eskmeals Beach.</p> <p>We understand from speaking with some of our neighbours that you held a public consultation meeting last Thursday night 11 February 2010. We would like it to go on record that this meeting was not publicised in the local media, nor was it directly publicised to any of the local residents. We believe that the Parish Council were only informed of this meeting by second class post on the day of the meeting. This lack of notice invalidates any "consultation" that you may deem to have been carried out in respect of this matter.</p> <p>It would appear that you are intending to do nothing to prevent the coastal erosion at Eskmeals Beach, which immediately threatens at least half a dozen houses and farms, and in the medium term, many more. This would appear to be on the basis of a flawed economic assessment. Your own document "Management Unit No. 7", a copy of which I enclose, states that the Present Value of flood and erosion damage over the next fifty years is £43,080. If one takes the cost as just representing the lost houses, where in the local area do you expect to buy a house for less than £10,000? However, a proper analysis would reveal that this road is also the only goods access to the MOD Firing Range at Eskmeals.</p> <p>The Range is a significant local employer. Its weapons testing work supports the front line British troops in Afghanistan. It is also of strategic importance to the armed forces as a whole, due to it being the only firing range in northern Europe that is permitted to fire out to sea. The relatively shallow nature of the Irish Sea allows for recovery and analysis of fired munitions, further aiding research. If you allow this road to be lost, then you not only damage the economy of the local area, you also</p>		<p>Thank you for the response. We understand that the meeting was publicised in advance, albeit at short notice, note that there was good attendance on the night.</p> <p>This quotation does not seem to be from the SMP2 documents.</p> <p>The SMP2 draft policy proposed was no-active intervention for the coastal defences, but assumed that the highway would be re-aligned as previous studies had shown that this would be the cheaper option. Losses of properties under a No Active Intervention Scenario are not expected to take place before the long term, ie 50 to 100 year epoch. The values used in the SMP economic assessment take into account discount rates to estimate the present value of losing the asset in 75 years time. The cash value of residential properties, based on the National Property database used for the economic assessment was £762,000, as indicated in Appendix H, Annex 1, Table 4.</p> <p>Response noted, see also response submitted directly by the MoD.</p>	<p>Move policy unit boundary to south of Stubb Place and change whole frontage to MR, MR, MR</p>

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	<p>damage the UK's military capability. Regardless of one's own opinions of current military operations overseas, the majority of public opinion is (quite rightly) firmly behind the troops themselves. Weapons and systems tested at Eskmeals are also currently employed by the Royal Navy in policy international shipping lanes such as those off the Somali coast which are currently in the news. However, your current and intended inaction at Eskmeals beach puts this vital work at risk of curtailment.</p> <p>Taking a slightly wider look at the area around Eskmeal's Beach, it becomes apparent that the £43,080 must also be to cover the loss of the coastal railway line. This is the line that allows for safe transit of flasks of nuclear material to Europe's only sizeable reprocessing facility at Sellafield. With the next generation of nuclear power stations about to hit the drawing boards, the National need for this line will become ever greater. It is also heavily used by commuter traffic, especially from Millom, thus playing its part in reducing the production of CO2.</p> <p>Locally, many areas to the north and south of Eskmeals are earmarked by local and borough councils as areas requiring development and improvement. Nationally, the West Coast is recognised as having some very impoverished areas. Three of the new nuclear stations are earmarked for the West Coast. However, your approach seems to be very different, judging the area not worthy of investment. Surely you should reconsider your position so as to be in line with the other agencies and both local and central government?</p> <p>Are you aware that Eskmeals Beach is one of only a handful in the National Park? It is an amenity that should be protected, not neglected. In the past, it has been protected - neglect has led to the current damage. As a civil engineer, it is obvious to XXXX that the long, gentle shelving beach has at its back, glacial moraine and river silt. This material is very susceptible to damage from erosion. However, simple toe protection, such as that provided by well maintained gabion baskets will prevent further erosion for very little expenditure. The precedent for this was present at Eskmeals until relatively recently, and is clearly evident in the well protected beach at Seascale only a few miles up the coast. Your own document backs this up.</p> <p>The area is a haven for wildlife - many species of owls, birds of prey such as Buzzards and Kestrels, bats, deer, badgers etc.</p> <p>The land that is being lost due to the current lack of protection is mostly farmland. We are all meant to be reducing our carbon footprint, and much is made of the impact of flying in fresh produce rather than growing our own. It makes better economic and ecological sense to produce more of our own in the UK. However, you are dismissing farmland as unimportant.</p> <p>As we have stated elsewhere, it would appear that your proposals are based on flawed information, and your consultation has been in name only, and has made no genuine attempt to involve the local communities. Your current proposals also fly in the face of your previous recommendations, which were to maintain the (then) current gabion baskets.</p> <p>We would urge you to reinstate the gabion basket protection as a matter of urgency. Further, we would urge you to undertake a properly advertised (well in advance) consultation with all of the local community in Waberthwaite, Newbiggin, Eskmeals, Monk Moors, Middleton Place, Hycemoor, Bootle Station, and Bootle as a matter of urgency. In addition to a leaflet drop of local residents to inform them of the next meeting, BBC Cumbria, The Whitehaven News, and other local media regularly carry notices of such a nature. We are sure that they would also be interested to carry a story of yet another quango failing to engage with the very people who are impacted by that quango's (in)actions, the potential loss of local jobs and housing, and the loss of natural amenity. Finally, we would suggest that you move away from what is clearly a desktop study, and review the reality of the situation, with engineering input. Please do not claim to have done this already, just because Halcrow have drawn</p>		<p>This is incorrect; the railway is not expected to be lost due to erosion over the 100 year SMP appraisal period. It is possible that the embankment may need reinforcing to cope with the adjacent land being subject to occasional flooding.</p> <p>Both national and local investment in coastal defence has to be prioritised.</p> <p>The construction of hard defences could be detrimental to maintaining a beach and the nature and wild life benefits noted by the respondent. Even if toe protection is constructed, the beach is predicted to continue lowering, and so would eventually be lost. The option of managed realignment would allow future roll-back of the road and assist in the maintenance of a beach.</p> <p>As noted above the expenditure on defence has to be prioritised.</p> <p>Following review of additional information and consultation responses including this one, the draft No Active Intervention Policy is now proposed to change to Managed Realignment, with the policy unit boundary moved to the south of Stubb Place so that coastal risks at Stubb Place, Marshside and Eskmeans Range are considered together. The proposed policy of Managed Realignment will allow for short term works to be undertaken to slow or manage the erosion until a longer term approach of setting back the road can be put in place.</p>	

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Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
	<p>your maps. It is manifestly evident that no engineering assessment has been carried out, and your own documents state as such.</p> <p>We are sending this letter by the "next day guaranteed" service so that we know you will definitely receive it. We would very much appreciate an immediate phonecall to confirm its receipt, a written confirmation of same by return post, and a subsequent written answer, addressing all points raised, within fourteen days. We trust that these timescales are acceptable, given that we understand that you gave those people attending the meeting only one working day to raise their concerns with you in writing. We are also sending a copy of this letter by email to our local MP, Jamie Reed, who takes a very active interest in local matters.</p> <p>We look forward to hearing from you before the week is out to confirm receipt, and subsequently, with your full reply in the next two weeks.</p> <p>Above all, we look forward to the news that the reinstatement of the gabion baskets is to be carried out this year prior to the next season of Autumn storms.</p>			
PCR_224 MP for Copeland	<p>Mr Reed has recently received a copy of the enclosed letter sent to you by Mr and Mrs France (PCR 204), with regard to the recent consultation on the issue of coastal erosion. Mr Reed is very concerned at the apparent lack of knowledge in the community of this consultation, and of the implications of your recommendations for this vulnerable stretch of coast. As you will see from Mr Frances letter there are a number of serious issues which need to be addressed with regard to the long term security of the stretch of coast in question.</p> <p>The road that runs parallel to the beach at Eskmeals is one of the primary concerns that Mr Reed has, apart from servicing the private housing in the area the road is the only means of access to the QinetiQ firing range at Eskmeals. This facility has been in existence for over a century, and plays a strategic role within the nation's defences development strategy, as well as being an important source of jobs locally.</p> <p>Mr Reed is completely mystified as to how you arrive at the figure £43,080 as the likely cost of damage arising from continued coastal erosion over the next fifty years, taking into account the close proximity to the coast of the Cumbrian coastal railway, which is used by both passenger trains and by the Sellafield nuclear plant for the transport of nuclear fuel and waste.</p> <p>It would appear that your deliberations are based on a total lack of knowledge and a great misunderstanding of the situation. The consequences of taking no remedial action to prevent further significant coastal erosion, for the local area would be disastrous. Mr Reed would request that you consider you action plan for this locally and nationally important area of the coast. I am copying this letter to the relevant Minister Huw Irranca Davies, for his comment.</p>		<p>The SMP is a high level document which identifies the most sustainable approaches to managing the risks to the coast over the next 100 years. The SMP outlines how the shoreline should be managed in the future, balancing the scale of risks from coastal erosion and flooding with the social, environmental and financial costs involved, whilst avoiding adverse impacts on adjacent coastal areas.</p> <p>Mr and Mrs France sent a letter in response to the consultation on the draft SMP2, which is the letter that you are in receipt of. Following receipt of Mr and Mrs France's letter on 19th February 2010, I had a long telephone conversation with Mr France, explaining that the attachment to his letter was actually an extract of SMP1 and not from the SMP2 review. SMP1 was written in 1999 and is now out of date. The current Draft SMP2 is the update of this document and therefore the figures quoted in Mr and Mrs France's letter are outdated and have been revised in the draft SMP2 document. From my conversation with Mr France, I ascertained that he has seen the Draft SMP2 document, which we are consulting on, and still has some concerns but he has not submitted a written account of these. I have passed onto the project team the concerns that we spoke about and these will be duly considered as part of the consultation process.</p> <p>In response to the other concerns raised in your letter:</p> <p>The road that runs parallel to the beach at Eskmeals has been an area of much discussion both during plan development and during consultation on the draft SMP2. A previous study, reviewed by the SMP2 project team, undertaken by Bullen Consultants in 2003, suggested in the long term that the most sustainable option would be to relocate the road. The draft SMP2 policy is 'No Active Intervention' for this frontage and in the longer term suggests that it is more sustainable to relocate the road. In the action plan we have suggested that the Highways Authority and MOD need to further consider the viability and timing of realignment of the road as this is not a coastal management issue. This option should therefore not interfere with the</p>	Move policy unit boundary to south of Stubb Place and change whole frontage to MR, MR, MR

Selker to Eskmeals – I Id 2				
Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
			<p>operation of the QinetiQ Firing Range.</p> <p>However I think it is worth noting that as a result of the SMP2 consultation, which has attempted to bring together interested parties, I believe there are now agreements being put in place for works to be undertaken to protect the road at Stubb Place in the short term.</p> <p>As discussed above the figures quoted in the letter from Mr and Mrs France are out of date. The costs of damages arising in this policy area (Selker to Eskmeals) under a No Active Intervention policy, in the current document, are valued at £1,128,000 (including residential and commercial properties and agricultural land) although this does not include the Cumbrian Coastal Railway. At Stubb Place the railway is not at risk of erosion over the 100 year appraisal period of the SMP as it is set back more than a kilometre from the coast, whereas the predicted erosion is up to 50m.</p> <p>It is recognised that the railway is at risk where it crosses the Ravenglass estuaries to the north and to north of Seascale where the railway is immediately adjacent to the coast, but here the protection of the railway is undertaken by Network Rail and it is envisaged that this would continue.</p> <p>Following review of additional information and consultation responses including this one, the draft No Active Intervention Policy is now proposed to change to Managed Realignment, with the policy unit boundary moved to the south of Stubb Place so that coastal risks at Stubb Place, Marshside and Eskmeals Range are considered together. The proposed policy of Managed Realignment will allow for short term works to be undertaken to slow or manage the erosion until a longer term approach of setting back the road can be put in place.</p>	

Ravenglass Estuary Complex – I Id 3				
Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
PCR_112 Individual, Eskmeals	<p>I Id 3.1</p> <p>Why no plan to defend the road around the estuary from Newbiggin to Stubb Place. What are likely risks of flooding?</p> <p>We were on EA flood warning register. I recently received a communication saying the risks had reduced.</p> <p>Is it right to say properties may have to be abandoned. Who will fund relocation. Properties immediately next to viaduct. I live in one.</p>	N	<p>The road is already subject to tidal flooding and the frequency will increase in future due to sea level rise. The draft SMP2 policy was NAI in this location, however, maintenance / additional works to reduce risk to the viaduct and railway as long as it is in operation would be permitted, subject to consent.</p> <p>The NAI policy would allow natural evolution of shoreline and provide space for rollback of the saltmarsh as sea levels rise. Continuation of natural processes is conducive to the international and national designations. In addition, the broad level economic assessment for this section indicates that there is likely to be insufficient economic justification for new defences.</p> <p>At present, there is no provision for compensation from central funds to offset any loss due to flooding or erosion suffered by property and landowners, see next response.</p>	
Silloth Meeting 26.01.10 Individual, Eskmeals	<p>I Id 3.1</p> <p>In the Esk Estuary (Copeland) the plan says that some properties may be abandoned due to flooding or inaccessibility. Who is going to pay for it? Is it local or national?</p>		<p>Government policy is to take a risk based approach to managing coastal change and flood risk. It is not possible or sustainable to defend everywhere.</p> <p>The Environment Agency and Local Authorities have permissive powers to manage coastal and flood risks to communities and assets where it is technically feasible, environmentally sustainable and economically viable to do so. Investment in defences is subject to national prioritisation against outcome measures specified by central government.</p> <p>At present, due to the permissive powers of the local authorities and Environment Agency there is no right to coastal defence and there is no provision for compensation from central or local government funds to offset any loss due to flooding or erosion suffered by property and landowners. However, the government is presently undertaking some pilot projects developing coastal adaptation measures and it is possible that there may be changes in policy in future to promote adaptation where it is not sustainable or affordable to defend.</p>	No changes proposed.
PCR_208 Muncaster Parish Council	<p>At its meeting on 16th February 2010 Muncaster Parish Council considered the Shoreline Management Plan for Ravenglass Estuary Complex (I Id 3). The plan is for either No Active Intervention or to Hold The Line and, in general, the Parish Council understands these philosophies. There are however some detailed points that should be included in the proposals:</p> <p>Overview: Muncaster Castle will never be at risk of flooding being built on a promontory high above the river Esk. It states later in the document, under Historical Environment, that a small area of Muncaster Castle Registered Park and Gardens might be at risk. This is a more accurate statement.</p> <p>Location (Policy Unit) 3.1 Justification Social states – There may be a need to raise the road at Muncaster Bridge in the future. We think there is a need to raise the road or take some other measures NOW. The road is regularly flooded by peak tides. There is an Economic Justification in that the road can be impassable for significant periods of time. There is also the cost of damage to</p>		<p>Response noted.</p> <p>Agreed, we will revise the overview.</p> <p>Response noted, we will add a short term Action Plan item.</p>	<p>Amend overview</p> <p>Add Action Plan item to raise awareness with highway authority and suggest they consider raising road or other measures.</p>

Ravenglass Estuary Complex – I I d 3				
Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
	<p>vehicles, repeat maintenance and, possibly, road traffic accidents.</p> <p>Location (Policy Unit) 3.1 Ravenglass: The policy is to Hold The Line by maintaining/improving seawalls and embankments. The existing sea defences are now in need of maintenance before they become unstable.</p> <p>The only road into and out of Ravenglass goes under a railway bridge. Flooding regularly occurs at this point due to high tides and blockage of drains. Action needs to be taken now and maintenance needs to be kept up in the future.</p> <p>Erosion of the Ravenglass Roman Fort Scheduled Monument is ongoing and appears to be increasing. It appears unlikely that this will be prevented until such time as it reaches or endangers the railway line.</p>		<p>Response noted.</p> <p>This is an action that should the highway authority</p> <p>The SMP action plan recommends that the responsible authorities consider the need for protection mitigation</p>	No change proposed to SMP.
PCR_62 English Heritage	Several curators noted that the treatment of scheduled monuments and historic environment assets generally is inconsistent. For example, there is no mention at all of the scheduled monument of Ravenglass Roman fort (Glannaventa), or that part of it is seaward of the railway line, and subject to threat of erosion.		Ravenglass Roman fort is mentioned in the draft policy statement for I I d 3 summary SEA table, and Action Plan, where a study is recommended. The site is in policy unit 3.1 and is shown on the policy mapping. This is an area where we were uncertain where to put the PU boundary, as the site could alternatively be included with the Ravenglass frontage PU 3.2, where we have recommended a draft HTL policy. According to the draft RCZA report from ARS the site seaward of the railway has been subject to erosion and this is why we recommended a study, which should consider the risks and viability of provision of protection and confirm the policy for the next SMP review.	No change proposed, as further studies for Ravenglass Fort already included in draft SMP Action Plan.

Drigg Point to Seascale – I Id 4

No responses

Seascale to St Bees – I Id 5				
Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
<p>PCR_160</p> <p>Individual, Braystones</p>	<p>I Id 5.5</p> <p>I have been to the meeting held at Muncaster Castle, 11th February, 2010.</p> <p>Which had been hurriedly convened, as residents on this coast, we had not been notified until about the end of January, when it came as a shock surprise, to know that there was a management plan for this coast. However management appears to be nil for the residents of this section of Braystones Beach who number about 40 dwellings, many of whom are full time residents. This seems very odd without any duty of care or understanding. These properties provide a real protection to the British Rail, which runs along the coast, and is vital for the Sellafield Nuclear Site, Also for the new build sites which are in the pipeline (or has this been ignored.)</p> <p>Proof of this protection of the railway is the constant shoring up of the embankment where there are no properties. Many of these are substantial dwellings, and warrant some help in protecting the shore from further erosion. We as a group of residents every year have a pebble bank built in front of our property, and maintain a roadway. The crossing at the railway is the main access to the beach and needs to be maintained, as it is a public right of way.</p> <p>We are not asking for anything elaborate to be built, deep stanchions or rock armour, as is placed at the railway crossing, or even groynes as there are at St. Bees, at various points on the beach. This would be of immense advantage to the protection of properties and railways., and Sellafield Nuclear site.</p> <p>I see on the proposed schedule protection is assured for Seascales and St. Bees, because of the tourist attraction. We are in the middle and have the unique wild beauty and serenity of the beach in our interests too, even though it is not for the tourist. We are also part of the Coastal Way, which many people follow. If something is not done, and the properties left, as said in the Schedule, the sea will create a mess of broken properties and a railway line useless, and ugly in its disintegration.</p> <p>There was a lot of talk about Funding, and where it was to come from, and no real answers were given. There seems to be plenty of funding for bizarre art projects and other schemes from various areas and wastage of money with reviews and planning, which never get off the ground.</p> <p>The Councils should have more input, we all pay taxes, and all the talk of climate change, but no action, waiting as ever until it is too late to do anything. British Rail should have more input in the protection and management of the line. Also give regard to what we, the residents of Braystones beach contribute to the safety of the railway line.</p> <p>Another point on the Schedule for Sellafield, where you say 'to hold the line with defences', this too should include the whole of the line down to Nethertown. To only do small areas, still endangers the railway line, and create inland flooding where it would be dangerous, with the nuclear industry waste plans.</p> <p>Again, I find it hard to credit that you recommend 'no active intervention' 5-6 on your schedule.</p> <p>No further properties is right, granted, but protect what is already there for this unique part of the Cumbria Coast. There is nowhere quite like it in all England, or indeed Great Britain. We have endured many storms and those of us who do care for our properties continually keep them in good</p>		<p>Response noted.</p> <p>The assessments noted that the properties located on the beach seaward of the railways are already very vulnerable to storm damage and unlikely to be sustainable in the long term due to expected rise in sea level. As noted some sections of the railway are already heavily defended with armouring. There is a natural shingle bank where the properties are located that has provided a degree of natural protection to both the railway and the buildings.</p> <p>The proposed approach in the draft SMP allowed for development of an adaptation strategy for properties on beach and beach management to help reduce risks in the short term, but noted that it is not technically viable or economically justified to construct defences in front of the properties in the medium to long term, ie beyond the next 20 years.</p> <p>It is incorrect to say that protection is assured as all expenditure on defences has to be prioritised.</p> <p>Public funding for coastal defences generally comes as direct grant from central government, via the Environment Agency to the local authority in its Coast Protection Authority function. However, there is a limited national budget that has to be prioritised and this takes into account socio-economic and environmental factors. Funding of coastal defences for the railway is dealt with separately and directly by Network Rail, and their works will take into account risk assessments for their infrastructure; the proposed SMP polices allows for Network Rail to undertake improvements to defences when necessary, subject to consent.</p> <p>Defra has recently funded a number of coastal adaptation pathfinder projects that are investigating alternative approaches to managing coastal risks for locations where traditional coastal defence is not considered viable or affordable. Although there is no commitment to this as an ongoing policy yet, see</p>	<p>Revise policy in 1st epoch to Managed realignment and add to action plan adaptation strategy, emergency access, planning, EA flood warning etc & Liaise with residents association</p>

Seascale to St Bees – I Id 5				
Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
	<p>order.</p> <p>It is imperative that the Environment Agency, and businesses, Councils and Tourist industries and Government also wake up to their responsibilities to our coastline.</p> <p>Thank you for the meetings that have been arranged and enabling us to air our views, which sincerely hope will be considered seriously. People's views who have lived on the beaches understand how things are much better than strangers who can only surmise the situation of each particular area. However many instruments are used.</p>		<p>http://www.defra.gov.uk/environment/flooding/manage/pathfinder/index.htm</p> <p>It is considered that some form of assistance with adaptation may be possible for some areas in future. It is therefore proposed to revise the draft SMP Policy for the short term to Managed Realignment, which may better facilitate a number of adaptation tasks such as flood warning system, evacuation plans and medium term relocation strategy to be developed.</p>	
<p>PCR_117</p> <p>Individual, Braystones</p>	<p>As you will see from my address above I live on the beach at Braystones.</p> <p>On 25th January 2010 My neighbours and I received a letter inviting us to a public consultation meeting the following evening at Silloth. The letter was written by David Bechelli, titled "Public Consultation on Plans to manage the Shoreline at Braystones, Nethertown and Couderton" and is referenced as NTL/DB.</p> <p>The letter explains that "the draft of the Shoreline Management Plan is currently out for public consultation and it is important that you understand and have your say on what it suggests for your area" We only received 24hrs notice of this meeting. The venue is at Silloth which is a round trip from Braystones of about 100miles and would take at least an hour and a quarter travelling time in each direction. This is unacceptable I tried to contact David Bechelli on the number provided in his letter. The number was unobtainable and it was only through perseverance that we were eventually able to speak at 1700hrs on the 25th.</p> <p>The inappropriate choice of meeting venue i.e. Silloth, for an issue which affects the residents of the parish of Lowside Quarter in Copeland (as referenced in the title of your letter) and the late issue of the letter of notification effectively exclude us from attending the consultation. The beach communities of Braystones, Couderton and Nethertown must be involved in this process of consultation as we are the most vulnerable and most likely to be affected.</p> <p>We consider this stage of the consultation process is invalid and we shall be making the necessary representations at government level if you are unable to provide a solution.</p> <p>To his credit David Bechelli has since contacted me enquiring if I and my neighbours would be available to attend a meeting at Ravenglass on 8th February 2010. He has yet to confirm these details. I said I would provided that the consultants who have been engaged to conduct the survey on your behalf are also in attendance(as they were at the Silloth meeting)</p>		<p>A further meeting did take place at Muncaster Castle on 11th Feb 2010 and was attended by a number of individuals from the Braystones area.</p>	<p>No further action proposed</p>

St Bees – I Id 6

No responses

St Bees Head – I Id 7				
Response from?	Response	Agree to draft Policies?	SMP2 Team Comments	Proposed Action
PCR_113 EA NW	We agree with the NAI policy for the SSSI	Y	Support for draft policy is acknowledged	No action required