

North West & North Wales Coastal Group

North West England and North Wales Shoreline Management Plan SMP2

Annex B14

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

| St Bees Head to Whitehaven – I1e1 | | | | |
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| 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 and the open ended proposals for Saltom Pit | Y | Support for draft policy is acknowledged. | No action required |

| Whitehaven to Workington – I le 2 | | | | |
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| Response from? | Response | Agree to draft Policies? | SMP2 Team Comments | Proposed Action |
| PCR_50 Copeland BC | <p>I le 2.3</p> <p>I have major concerns concerning the rapid erosion at Parton, where the problem has accelerated further.</p> <p>The area concerned is the section after the rock armour at the south end of Parton beach, the footpath has disappeared and there is major concern now that the next problem will be that the tidal water will go through the tunnel under the railway and flood properties on Foundry Rd Parton. The railway embankment is also in serious danger of tidal erosion as well.</p> <p>With the acceleration of this erosion over the last 12 months or so would raise the question will this breach happen this winter?</p> <p>The residents of Foundry Road Parton already have continuing problems with flooding from surface water drains and occasionally sewage, tidal flooding would be the final straw.</p> | N | <p>The draft policy is HTL to continue to manage risks to assets in the village as well as the railway.</p> <p>Responsibility of maintaining the railway defences lies with Network Rail.</p> <p>JBA, on behalf of Network Rail are looking at this issue and are undertaking an over-topping analysis.</p> <p>Maintenance practices are however, outside the scope of the SMP; however we will forward your concerns onto Network Rail.</p> | No action required |

| Workington to Maryport – I1e 3 | | | | |
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| Response from? | Response | Agree to draft Policies? | SMP2 Team Comments | Proposed Action |
| PCR_113 EA NW | From Siddick to Risehow and Maryport, much of the coast is a County Wildlife Site but this doesn't seem to be referred to at all. Presumably this has been a conscious decision not to consider such sites, but if so this needs to be carefully justified given our general duty to promote conservation. | | As the SMP is a high level document, and covers a large area of coast (between North Wales and the Scottish border) we have only included environmental areas designated for their international and national conservation importance. This is noted in Appendix D. County Wildlife Sites should be taken into consideration at strategy and scheme level. | No action required |
| PCR_216 Individual Maryport | Your plan for Workington to Maryport shows leave alone for nature to take its course – that's fine but there are things to consider here. 1) Part of that shore is a substantial breeding ground for Oystercatchers and Ringed Plovers – over time they will need some protection not from erosion but from people. Next point – For approx ¼ of a mile South of the SSSI site at Maryport the shoreline has stopped eroding away already – grass growing amongst the rocks by the high bank. I believe this stretch should be cleaned up as it is all covered in a thin layer (less than a metre) of slag from the old steel slag bank tipping procedures. Note that where the sewage building outfall pipe was laid and the slag dug away the shore has all but returned to a beautiful natural state. I believe it would be a great return for the investment to dig off all this hard slag and let the shore become sandy and pebbled as it was naturally. I also think there is a good argument for erecting some large groynes South of this stretch – it would hold up the migration of a lot of pebbles and eroded bits of slag – increase the shingle area for the birds nesting site and also reduce the amount of removal of this stuff that is currently done on a 2 monthly basis from the edge of the harbour entrance by Armstrong Contractors – By doing these few things the Flimby to Maryport stretch would be greatly enhanced – become a tourist attraction and help the harbour. | | Response noted. However, the consultation draft SMP2 proposed a combination of Hold the Line, Managed realignment and No Active Intervention between Workington and Maryport. The draft policies were proposed to manage the flooding and erosion risks. The frontage between Risehow and Maryport is, as you say, proposed for No Active Intervention for coastal defence. The removal of shingle from the foreshore, if undertaken on large scale or long term, could increase coastal flood or erosion risk elsewhere, so consideration of this at more detailed level will be added to the SMP Action Plan. The frontage between Siddick and Risehow has a proposed Hold the Line policy, due to the coastal flooding risks to the railway, main road and properties located in the low lying adjacent land. While it is not anticipated in the SMP that large groynes would be required here, detailed consideration of approach is left to scheme and strategy level. | Add consideration of sustainability of removal of shingle to SMP Action Plan. |
| PCR_223 Lord of Seaton | I was surprised to learn that you have developed such a plan and that I have not been informed or involved in such discussions. I am the registered freeholder of the foreshore from the Port of Workington up to Flimby - requested title No CU205410. I would like to attend any meetings which involve my foreshore i.e. North of the Port of Workington, Siddick and Seaton up to Flimby. My attendance would be as landowner of affected land. Please keep me informed. | | Comments noted. | Add action to consult the foreshore landowner regarding any more detailed developments in this area. |

| Maryport to Dubmill Point – I le 4 | | | | |
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| Response from? | Response | Agree to draft Policies? | SMP2 Team Comments | Proposed Action |
| <p>PCR_102</p> <p>David Mossom</p> | <p>I le 4.3</p> <p>Thank you for giving me the opportunity to present you with the letter from Crosscanonby Parish Council written to Capita Symonds in response to their extension of the Hadrians Cycleway proposals. My feeling is that the coastline between Maryport Golf Course and the Eastern end of Swarthy Hill being the boundaries of the coastline in the Parish of Crosscanonby should be protected. The Gabion baskets at the Saltpans have proved to be an unqualified success. The remaining grass between the high water mark and the B5300 is a shrinking but valuable resource. The use of the land to the south of the road for the proposed cycleway, to be funded in the main by Cumbria County Council and grant aid is dodging the erosion issue. The plan suggests a mini roundabout at Crosscanonby Road Ends. At the moment the road at that point is less than 20 meters from the last incursion by the sea. The waste bin placed there by Allerdale is almost an island. There is a Gas main nearby which is in jeopardy.</p> <p>It beggars belief that given the cost incurred due to the policy of non intervention in the river beds to the whole area following the November rains that Cumbria County Council, Allerdale and all the other agencies involved will sit back and wait for the B5300 to be swept away.</p> <p>The erosion is not natural, it is caused by the building of Maryport pier. The Gabions are a proven solution at that particular point. They are cheap. The cost of the brown signs and the other incidentals in the cycleway plan cost more than the Gabions would. The current public access would be assured the road saved, enfilading of the Saltpans would be prevented and the Gas main saved. As I said last night it is high time there was some joined up thinking by the agencies involved rather than one waiting for the other to take responsibility. Millions have been poured into Maryport. It cost, 20 or so years ago, around £60k for Allerdale to search for what was called locally a Roman bait cabin on the top of Swarthy Hill. Nothing was found so they built a fort with a digger and a dumper truck and now it is an ancient monument! Yet sadly that wonderful resource, the strip of land between the road and the sea, is to be allowed to be washed away for the want of about £300k for the clearly proven Gabion baskets.</p> <p>Thank you for your time last tuesday and I do hope my comments may in some small way help to change the Shoreline Management Plan from No Intervention to Hold The Line between Maryport Golf Club and Blue Dial.</p> <p>Also provided copy of letter to David Clare re cycleway. (PCR_110_111_112 & misc Silloth Workshop.pdf)</p> | | <p>Response noted. The draft plan proposed No Active Intervention for this area, which is in Policy Unit I le 4.3. Following concerns raised during consultation, including this one, the proposed policy has now been changed to Managed Realignment in all three epochs. This will allow for the risks to the historic environment assets, the highway and other assets to be managed appropriately through adaptation and minor short term works, such as the previous use of gabion baskets. However, due to the nature and scale of assets at risk it is not expected that coastal defence measures for the whole policy unit would qualify for national funding.</p> | <p>Revise headline policy for I le 4.3 to MR/MR/MR</p> |
| <p>PCR_119</p> <p>Crosscanonby Parish Council</p> | <p>PU4 3(Part) MARYPORT GOLF CLUB TO BLUE DIAL FARM</p> <p>Thank you for the presentation and open discussion at your Public Consultation Workshop at Silloth on 26th January 2010 which I attended with other members of Crosscanonby Parish Council.</p> <p>At the meeting members pointed out that as well as your current consultation on a revised shoreline management plan, Capita Symonds had also recently presented to Cumbria County Council a feasibility study for the construction of a cycleway known as B5300 Hadrians Gateway. This section forms part of the National cycle network which runs from Ravenglass to South Shields.</p> <p>The cycleway will be unique as it follows the length of Hadrians Wall World Heritage Site and part of the Frontiers of the Roman Empire. The Vice Chair of our Council David Mossom presented both your colleagues with our council's response to the Capita proposals which we hoped would be included in your appraisal. Further copies are available if required.</p> <p>There is also the possibility of the future coastline pedestrian way passing along this section of foreshore.</p> | <p>Y</p> <p>(in part)</p> | | |

| Maryport to Dubmill Point – I le 4 | | | | |
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| | <p>In discussions with Capita Symonds members have pointed out that consideration should be given to providing an overall scheme protecting the road, the gas main and the remaining land north of the B5300 from further erosion. This would require your plan to be amended from No Active Intervention to Hold the Line. The Gabion Baskets which currently protect the Salt Pans show that in this location this type of intervention works extremely well with no major costs involved relative that is to the re siting of the road or indeed the building of a cycle path.</p> <p>Surely it would be to the benefit of all interested parties to arrange a meeting with a view to co-ordinating an overall scheme to enhance this section of coastline for the benefit of tourism and the general public.</p> | | | |
| PCR_110 Crosscanonby Parish Council | Maryport Golf Course, Swarthy Hill - Please send hard copy of predicted coastline with NAI for 20, 50 and 100 years. Also Swarthy Hill to Allonby assessments in Appendix G. | | | |
| PCR_113 EA NW | In the Maryport to Allonby section the B5300 is likely to prevent landward migration of sand dunes so it is appropriate to consider its long term position. | | | |
| PCR_148 Crosscanonby Parish Council | <p>I le 4.3</p> <p>Councillors were given an update at last night's council meeting on the above event and the current plan.</p> <p>Individual councillors present did submit their personal views but the council as a whole would like to support those views. Of the two scenarios presented for the coastline within Crosscanonby Parish we would like to see Scenario A go forward that is HTL 'Hold the line', G.2.5.4, on page 187 of the plan. We do not agree or support a 'No active intervention' as outlined in Scenario B.</p> <p>We would be grateful if these opinions be taken into account.</p> | | Response noted. Due to the extent of assets at erosion risk and the need to maintain a naturally functioning coast to avoid impacts elsewhere it is not considered that the Hold the Line Scenario A could be justified or would be affordable. As a compromise the proposed SMP policy is to be revised to Managed Realignment, which will allow for minor local works to be undertaken where necessary and sustainable to do so. | Revise headline policy for I le 4.3 to MR/MR/MR |
| PCR_141 Holme St Cuthbert Parish Council | <p>PU 4.5 Edderside road junctions opposite shingle coast possible loss of road, have to keep B5301 road open major west coast route.</p> <p>PU 4.6 Seacroft Farm/Dubmill policy says HTL with maintenance of sea wall until study done 2015 would like findings from study shared with Parish Council. The cost of new road network has to be considered against the maintenance of the sea wall and the coast. Maintaining the viability of the B5300 for business, tourism and access to the energy coast is a major priority.</p> | | <p>Response noted. The SMP policy unit boundaries will allow for some flexibility, and this road junction would need to be included in consideration of re-routing of the coastal road.</p> <p>Response noted the local authority should continue to liaise with the Parish Council during more detailed level studies.</p> | No changes proposed. |
| PCR_216 Individual Maryport | <p>The harbour and North to Dubmill: There is a multi million pound project in its infancy to enlarge the water impoundment area of Maryport Harbour</p> <p>3 scenarios exist but it is likely the one they will go for is to move the outflow of the river Ellen North of the harbour – this would dramatically reduce the dredging cost for the harbour authority – its main cost in fact. Also it would mean that the shore north of the harbour which is currently unnaturally starved of sediment would receive all the rich deposits from the river and become a very good area for wildlife – again very little intervention needed once this was done but a good result for the area</p> | | The SMP development has taken into account existing development and proposed development that has been approved through planning. As the project mentioned is in its infancy it has not been considered. However, the SMP proposed policy for Maryport is to Hold the Line. If an Advance the Line option is proposed then subject to environmental impact assessments, it could be compatible with the SMP if the new defences are funded by 3 rd parties. | No changes proposed. |
| PCR_62 English Heritage | The section I le 4, 3 advocates letting the defences put in place to defend the Medieval saltpans at Allonby saltpans (inaccurately described as Roman) decay and then removing them. These defences are thought to have worked well, and were put in place with the full consent of the interested parties. Curators oppose the presumption of their removal and it is suggested that this be reconsidered and the defences maintained and renewed. | | Section I le4:3 I suspect your quote is from a pre-consultation draft, because the policy approach in the latest version, as on the website since the start of October, specifically allows for local limited intervention at the heritage assets in the short term (0 to 20 years) and for this to continue over the medium and long term if is sustainable to do so. | Revise headline policy for I le 4.3 to MR/MR/MR |

| Maryport to Dubmill Point – I e 4 | | | | |
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| Response from? | Response | Agree to draft Policies? | SMP2 Team Comments | Proposed Action |
| | | | Following concerns raised during consultation, including this one, the proposed SMP policy headline has now been changed to Managed Realignment in all three epochs. This will allow for the risks to the historic environment assets, the highway and other assets to be managed appropriately through adaptation and minor short term works, such as the previous use of gabion baskets. | |

| Dubmill Point to Silloth – I le 5 | | | | |
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| Response from? | Response | Agree to draft Policies? | SMP2 Team Comments | Proposed Action |
| PCR_105 Individual, Cumbria | <p>After attending the meeting at Silloth on Tuesday I was disappointed not getting direct answers as to why the previous SMP showed to Hold The Line along the Beckfoot shoreline but now No Active Intervention?</p> <p>Myself and many other locals are extremely concerned about a particular piece just south of Beckfoot (Castle Corner) where the B5300 road is very close to a 5 metre drop and is eroding rapidly due to daily attrition, wind, rain, frost, rabbits, birds and people with metal detectors "it is where there used to be a roman burial ground, now gone". Less than 2 metres from the road edge are services such mains gas and water also BT lines-fibre optics which will soon be exposed. Would any of these bodies be responsible / concerned about the problems this erosion is to cause them? I am also unsure about the situation where, because it is the Sub base of the road being eroded, as to where the CCC Highways are responsible for doing something about it ?</p> <p>Currently communicating with M Faulkner and P Marr (CCC Highways) re extensive erosion south of Beckfoot where the B5300 which is 6m above shore level is going to collapse and endanger road users.</p> | | <p><i>Direct response to email:</i></p> <p>The question about why there has been a change in policy from the previous Shoreline Management Plan is not a simple answer, which is why the answer given at the event may not have been adequate. In SMP1 Hold the Line was identified as the preferred scenario but it was only considered to be acceptable if any maintenance of the coastline was undertaken by soft engineering due to the importance of Silloth Dunes and Mawbray Banks, which are designated as Sites of Special Scientific Interest.</p> <p>In SMP2 both Hold the Line and No Active Intervention were looked at. Under the Hold the Line scenario there was concern that hard defences would negatively impact on the designated sites. Also although it was recognised that there are some assets at risk, under the updated guidance this does not make it economically viable (on a national level) to allow this headline policy. It is understood that much of the coastline at present is naturally functioning and relatively stable (although I understand there have been some attempts to stabilise the dunes) and therefore No Active Intervention was found to be the favourable option. It is recognised that there are assets at risk around Beckfoot including the road. As stated in the Action Plan the risk to these should be monitored and the case for local flood defences / individual property defences or resilience should be considered in the medium term or when risk increases.</p> <p>In answer to your question regarding whether the Highways Authority are responsible for doing anything, I am afraid I am unsure. It was mentioned by a member of the audience at the meeting that the Highways Act states that when the sub base is damaged, the Highways Authority do not need to repair it. I am afraid I am not familiar with that act so cannot really comment either way. However the Coast Protection Act only gives Coastal Authorities permissive powers for coastal defence and not a duty for coastal defence so it would be difficult to see how the Local Authority could be responsible. I think this is more of a specific legal issue and so beyond the scope of the SMP I am afraid.</p> <p>I also cannot comment on whether the companies you mention would be concerned or responsible. Certainly the utility companies have been asked to comment on the Shoreline Management Plan but being regional/national companies it can be difficult to get interest in the right areas.</p> | <p>I le 5.1 - Following consideration of this and other responses related to heritage assets the SMP2 policy is proposed to change to Managed Realignment in all three policy epochs. This will allow responsible bodies to take action to manage the risk to assets that they are responsible for, where appropriate and sustainable to do so. Managed realignment will enable limited local works to be undertaken to slow erosion whilst adaptation measures, such as relocating assets further inland or recording of historic environment sites is undertaken.</p> |
| PCR_113 EA NW | <p>I le 5.1</p> <p>In the Dubmill to Silloth section NAI is credited with allowing natural processes in the adjoining SAC/SPA, but the SSSI on that section (Silloth Dunes and Mawbray Bank) isn't referred to, even though it may also be affected in the next 100 years by the B5300. Given the statutory status of SSSIs it is necessary for them to be referred to, even if to make clear that the proposed options have taken them into account.</p> | | <p>The SSSI has been referred to in the SEA (Appendix I), where it is noted that there is potential for some erosion of Silloth Dunes & Mawbray Bank SSSI in the short, medium and long-term as sea levels rise. However, the small area of dune system within this scenario area is currently in favourable condition and is significantly accreting, particularly on the northern side of Dubmill Point. No active intervention is likely to be beneficial to this site, and the</p> | <p>Add beneficial impact on SSSI to policy statement impacts summary.</p> |

| Dubmill Point to Silloth – I le 5 | | | | |
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| | | | strandline through to mobile dunes will continue to be represented, resulting in a neutral impact. | |
| PCR_157 Individual, | I have noticed in the last few years how fast the dunes are eroding on Mawbray banks due to the elements, as part of the banks are a Roman Cemetery a lot of artefacts are been lost to the elements. Me and a colleague have been saving these artefacts and they have been reported to and recorded by the Finds Liaison Office for Lancashire and Cumbria. | | Response noted. The SMP2 Policy is proposed to change to Managed Realignment, which will allow the responsible bodies to take action to manage the impacts of the changing coast on the historic environment. | Revise headline policy for I le 5.1 to MR/MR/MR |
| PCR_141 Holme St Cuthbert Parish Council | <p>PU 5.1 This zone includes AONB and SSSI areas at Mawbray Banks and should be preserved for their wildlife and natural habitat. Isolated properties to the south of this zone (Mawbray Area) insuring that the policy of protecting these areas.</p> <p>The predicted erosion rates at Castles Corner at Beckfoot - this area being a world heritage site (Roman Fort and burial ground) should be protected along with the B5300 at this point south of Beckfoot which will be breached within 3 years. Not only coastal erosion from the sea but other factors have to be considered - the amount of heavy traffic along this fragile area, wildlife (rabbits and birds) are also factors along with winds, frost and metal detectors and normal daily attrition.</p> <p>A full study of Castles Corner is required as soon as possible like the study done at Dubmill, before the situation becomes irretrievable and the road is lost altogether. If a study is done, local councillors would be willing to contribute and we would like to be kept informed. Cumbria CC has been informed many times about our concerns with this section of the B5300.</p> <p>The report recognises the risk to Beckfoot, but the draft has discounted the option to hold the line, but we believe this should not be discounted, and should be actively considered to protect the assets of Beckfoot and the B5300. For the social and economic wellbeing of the area, we consider that the loss of the B5300 would cause major problems for the infrastructure of the parish and surrounding area.</p> <p>We feel that the consultation process itself is very last minute and slapdash with insufficient notice given for the meeting held at the Solway Resources Centre, Silloth. It was not given the gravitas of the subject when this plan is considering shore and coastal management for the next 100 years; we would like to be kept informed of any other proposals or changes to this plan.</p> <p>Discussions with the local community - many strongly disagree with the SMP predictions / forecasts. An oceanic physiologist and a geologist both with local knowledge disagree totally with major findings - their life time of assessing and understanding and working these natural processes in this area. The effect of the channel movements of sediments in the Solway statements in the document are not totally accurate, we can give more details if required.</p> | | Response noted. Due to the limited assets at risk and need to maintain the naturally functioning coast it is unlikely that Coast Protection grant funding will be possible for large scale intervention. However, following consideration of responses and additional information received during consultation the policy is now proposed to change to MR, MR, MR to allow responsible bodies to manage dune system for nature conservation, undertake adaptation measures in for the coastal road; and record, relocate or protect historic environment features in the World Heritage Site. | Revise headline policy for I le 5.1 to MR/MR/MR |
| PCR_62 English Heritage | Trying to balance disparate factors is obviously extremely challenging. Curators feel that, while the tables lists social, environmental and economic justifications, considerably more weight appears to have been given to natural environment than historic environment factors. For example, there are areas like 'Dubmill Point to Silloth', where the entire environmental section relates only to the SSSI site (and advocates allowing natural processes to continue) without mentioning scheduled sites and a Roman cemetery. Undertaking no management is described as necessary to conserve the environmental status of the area – clearly this does not conserve the historic environment! There needs to be an explicit statement of how the various factors and interests are being taking into account and balanced against each other. The whole methodology for balancing costs and benefits used to put forward the tables is unclear. | | <p>I agree that the Dubmill Point to Silloth (I le 5-1) SEA impacts table, which states “No known impacts on the historic environment” should be more specific and mention the assets of the WHS. The proposed policy in all 3 epochs is NAI, which is believed to reflect current practice. As you say, the whole of the coast is within the Hadrian’s Wall WHS, although the specific scheduled monuments are understood to be set back from the shoreline and not at erosion risk over the SMP period.</p> <p>Beckfoot Roman Fort was built as part of the northern frontier defences, along the west coast is included in Appendix D (Annex D5, pg 19). Where it is noted that: ‘visible as a slight raised platform, its unscheduled associated cemetery is the subject of ongoing coastal erosion. It is part of the Hadrian’s Wall World</p> | Revise headline policy for I le 5.1 to MR/MR/MR |

Dubmill Point to Silloth – I I e 5

| Response from? | Response | Agree to draft Policies? | SMP2 Team Comments | Proposed Action |
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| | <p>Further communication:</p> <p>On draft Action Plans, I agree with you that it is crucial for the relevant people to be involved in these. As you suggest, assessing the coastal risk to the historic environment features at Beckfoot and</p> | | <p>Heritage site and at risk of further erosion’.</p> <p>The cemetery is not designated as part of the SM and therefore has not been included in the objectives assessment. The objectives assessments also does not mention Beckfoot Fort as it is not considered to be at risk under NAI or the policies tested, which is supported by the NWRCZA: ‘Little of the fort at Bibra/Beckfoot (NY 08964884; SAM CU255; NMR 9087; HER 625C) survives as surface expression but internal details are still clearly visible on aerial photographs and have been mapped (Fig. 9.11), along with the extensive vicus (NMR9087; HER 626 C) which survives to the north and south of the fort, as part of the Hadrian’s Wall NMP. The site is situated on a low-lying sloping ground with the highest point on the western edge which overlooks a low till sea cliff. The site is not considered to be at risk of erosion in the near future however (M. Collins, pers. comm.)’</p> <p>In the NWRCZA: ‘Beckfoot Cremation cemetery (NY 08654850; HER 591 C) is located 400m south of the Roman fort, adjacent to the location of Milefortlet 15. The site has been known about for over a hundred years and was revealed by coastal erosion. The first excavation revealed a funeral pyre in 1948 (Hogg 1949). Continuing erosion has produced further finds of pottery, wood and metalwork. Whilst the HER states that erosion and shifting dunes have obliterated the site, recent geophysical survey and trial trenching suggests otherwise, with finds of coins and other material. British Archaeology magazine for September-October 2009 records that as recently as June 2009 a complete pottery vessel containing cremated human bone was found on the foreshore. Coastal erosion in this location has been recorded at over 0.3m a year by English Heritage and milefortlet 15 (mentioned above), may have already been completely eroded.</p> <p>The site is obviously of enormous importance, particularly given that little is known of the cemeteries associated with the Roman frontier defences and, given the years of erosion, which may have seen over 30m of land lost to the sea, the site is seen as a priority for further work. The SMP 2 draft policy for this section of coastline is NAI so the erosion of the site will continue unabated. Clearly the site at Beckfoot is in need of urgent archaeological intervention. The important Roman cemetery site at Beckfoot, to the south of the fort, is one of the most significant sites identified as part of the NWRCZA which is subject to active erosion by coastal process and therefore requires immediate archaeological fieldwork.’ We therefore need to mention the risk to the unscheduled cemetery as well as in the action plan, potential adaptation / mitigation measures such as the need for recording the feature before it is lost.</p> <p>Do you agree that the action plan for this section should be amended to include a more detailed assessment of coastal risks to the historic environment features and a strategy for managing that</p> | |

| Dubmill Point to Silloth – I Ie 5 | | | | |
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| | developing a strategy for managing that risk would be a useful outcome. As you know, scheduled monuments are not the only significant historic assets along the coast. Also, further discussion on the impacts of the SMP policy on Piel Castle and other at risk areas would be welcome. To that end, please send current versions of the draft Action Plans for Cumbria and Lancashire and I will circulate to those people. | | <p>risk?</p> <p>Following consideration of responses and additional information received during consultation, the policy is now proposed to change to MR, MR, MR to allow responsible bodies to undertake limited intervention to manage coastal risks and record, relocate or protect historic environment features in the World Heritage Site as appropriate.</p> | |

| Silloth to The Grune – I le 6 | | | | |
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| Response from? | Response | Agree to draft Policies? | SMP2 Team Comments | Proposed Action |
| PCR_111 Allerdale BC | <p>There does not appear to be any cross cutting thematic approach between different agencies involved(SILOS)</p> <p>HTL policy - do you intend replacing the wooden 'groynes' that have been in place for more than 6 decades with rock groynes i.e. Dub Mill Point. Breakwater replacement at position of Silloth Pier to protect Grune Point.</p> | N | <p>The SMP is a high level plan which identifies policies to manage coastal risks.</p> <p>The SMP action plan has recommended that a Strategy and process study should be undertaken which should confirm the policies for Silloth to Moricambe Bay, address the issues of interruption of shoreline sediment transport and investigate future defence options for the frontage. This further study would consider the most appropriate approach to deliver the SMP Policy.</p> | No changes proposed |
| PCR_197 Individuals, Skinburness | <p>Evident lack of communication with other groups, illustrated by recent publication of feasibility study for barrage schemes along the Solway Firth.</p> <p>I le PU 6.3 - Grune. Lack of proposed intervention is, we consider, ill-conceived. During highest tides the sea travels angrily along the Solway. When it enters the marshland (Moricambe Bay) it is dissipated by comparison. Should this piece of land be washed away it would have devastating effects on Cardurnock and Anthorn as these areas would receive the full force of the tide. The Grune headland acts as a natural breakwater.</p> <p>Skinburness - The gap in defences here could be breached. We would hope that the strategic study would be proactive and not reactive and hope that the area will be monitored regularly. We would also suggest the need to speak to landowners and English Heritage about possible actions that may be necessary to stop any breach.</p> | | <p>The SMP study has been based on the best information available at the time, and has to cater for assets already in place or where planning approvals are in place. The proposals for a barrage in the Solway are in their infancy and could only be taken into account in a general way. Thus in the policy statement for I le 8 – it is noted that “The long term flood risk management policy for the Solway Firth, as with other estuaries in the North West may change if proposals for tidal power barrages are progressed.” SMPs are expected to be reviewed on a 5 to 10 year basis.</p> <p>Response noted regarding the potential impacts of a breach of the Grune. The SMP recommends that a more detailed local study and also recommends that monitoring of coastal change continues.</p> | No action required |

| Moricambe Bay – I le 7 | | | | |
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| Response from? | Response | Agree to draft Policies? | SMP2 Team Comments | Proposed Action |
| PCR_75 RSPB | I le 7.3 Wath Farm to Saltcoates including Waver to Brownrigg - MR would be a more proactive policy – we believe locations do exist here where MR could be possible. | | We considered MR at a number of locations, which were rejected due to little economic justification and little need for habitat creation to mitigate losses due to coastal defences elsewhere. Given that there are already some set-back former defences in a number of locations, NAI would allow saltmarsh to roll back naturally with sea level rise, while still providing some protection landward. However, following review of responses and further information put forward during consultation, the draft policy is now proposed to change to Managed Realignment in PU 7.3, 7.4, 7.5 & 7.7. This will allow organisations, local land owners and responsible bodies to put in place measures to proactively adapt to coastal changes. It will also allow opportunities for habitat creation to be included within the Regional Habitat Creation Programme. | PU 7.3, 7.4, 7.5 & 7.7 Change to MR, MR, MR |
| | I le 7.4 Newton Marsh - MR would be a more proactive policy – we believe locations do exist here where MR could be possible. | | | |
| | I le 7.5 Newton Marsh to Anthorn including Wampool to NTL - MR would be a more proactive policy – we believe locations do exist here where MR could be possible. | | | |
| PCR_113 EA NW | Further discussion is needed before confirming the wording to accompany the draft headline policy for NAI. The potential for MR needs to be reflected in some areas. | | | |

| Cardrunk to The Scottish Border – I le 8 | | | | |
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| Response from? | Response | Agree to draft Policies? | SMP2 Team Comments | Proposed Action |
| PCR_75 RSPB | <p>I le 8.3 Bowness-on-Solway to Drumburgh</p> <p>- We are unclear why the earlier proposed policy of MR has now switched to NAI. We previously supported MR as the policy here, and continue to do so, as a more proactive policy.</p> | | <p>MR was considered at a number of locations, but rejected due to limited economic justification and little need for habitat creation to mitigate losses due to coastal defences elsewhere. For consistency, the policy was therefore changed to NAI for all 3 epochs but also allowing maintenance of existing localised private defences.</p> <p>However, following review of responses and further information put forward during consultation the draft policy is now proposed to change from NAI to MR in PU 8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.8, & 8.9.</p> <p>This will allow organisations, local land owners and responsible bodies to put in place measures to proactively adapt to coastal changes. It will also allow opportunities for habitat creation to be included within the Regional Habitat creation Programme.</p> | Revise NAI policies to MR in PU 8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.8, & 8.9. |
| | <p>I le 8.4 Drumburgh to Dykesfield</p> <p>- We are unclear why the earlier proposed policy of MR has now switched to NAI. We previously supported MR as the policy here, and continue to do so, as a more proactive policy.</p> | | | |
| | <p>I le 8.8 Rockliffe to Demesne Farm</p> <p>- We are unclear why the earlier proposed policy of MR has now switched to NAI. We previously supported MR as the policy here, and continue to do so, as a more proactive policy.</p> | | | |
| PCR_113 EA NW | <p>No real issues with the remainder - largely HTL at settlements and NAI / MR around the SAC/SPA Solway salt marshes which is as expected and in keeping with the designated status of that coast.</p> | Y | Support for draft policy is acknowledged. | No action required |
| | <p>Further discussion is needed before confirming the wording to accompany the draft headline policy for NAI. The potential for MR needs to be reflected in some areas.</p> | | <p>The potential for MR is reflected in the draft policies along this section. MR was proposed between Demesne Farm and the Metal Bridge (Esk) and between the Metal Bridge (Esk) and the River Sark. This has now been extended to include the other PU where the headline was NAI, in order to allow a more proactive policy for habitat creation and to allow responsible bodies to undertake any necessary mitigation or adaptation measures to manage risks to the World Heritage Site Features.</p> | Revise NAI policies to MR in PU 8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.8, & 8.9. |
| PCR_62 English heritage | <p>Curators do not understand what account has been taken of historic environment assets in arriving at the preferred policies. For example, it is unclear why, if historic environment assets are to be included as a consideration in SMP, that coastline with sites of World Heritage Status should have a preferred policy of No Active Intervention. As has been explained in previous rounds of the SMP exercise, World Heritage status is the highest possible international designation for HE assets. If WH sites do not qualify for proactive management, what are the chances for sites of national or local importance and what is the point of engaging in a consultation with the historic environment sector?</p> | | <p>Turning to your response regarding World Heritage sites, the two designated areas near the Cell 11 coast that I am aware of are the Liverpool Maritime Mercantile City area, and the area around Hadrian's wall. For the former, proposed SMP policy is to HTL for all three epochs. The Hadrian's wall site covers a large area of the southern shore of the Solway. The site includes a variety of different shorelines and some of the designated area is saltmarsh, seaward of the high water shoreline. Although the channels are mobile and it is a high energy environment, the shoreline of the Solway is not predicted to be at significant erosion risk. There are however, significant flood risks.</p> <p>Following review of responses and further information put forward during consultation the draft policy is now proposed to change from NAI to MR in PU 8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.8, & 8.9.</p> <p>This will allow organisations, local land owners and responsible bodies to put in place measures to proactively adapt to coastal changes. It will allow for limited or local intervention where adaptation is required to protect, delay erosion or reduce flood risk to World Heritage Site features where sustainable to do so, or to provide limited protection until recording has been completed. It will also allow opportunities for habitat creation</p> | |

| Cardurnock to The Scottish Border – I I e 8 | | | | |
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| Response from? | Response | Agree to draft Policies? | SMP2 Team Comments | Proposed Action |
| | | | to be included within the Regional Habitat creation Programme. | |