

GENERAL COMMENTS ON DRAFT SHORELINE MANAGEMENT PLANS

The South Foreland to Beachy Head SMP

East Sussex County Council raises no particular strategic policy concerns on the draft proposals except where indicated in the table of detailed responses below.

However, there are textural inaccuracies which need to be corrected, particularly the section on land use (page 16 -17).

- The planning reforms (under the Planning and Compulsory Purchase Act 2004) place a requirement on Regional Spatial Strategies and Local Development Documents (successors to local plans) to contribute to the achievement of sustainable development (section 39 of the Act).
- Local plans will be replaced by Local Development Frameworks (which include Local Development Documents mentioned above).
- The paragraph dealing with the Sussex Coastal Towns sub-regional strategy needs to be brought forward to follow the second paragraph in order for the text to flow.
- Also the advanced state of the draft South East Plan should be mentioned. The draft plan adopts a whole catchment approach to water management and acknowledges the links between biodiversity, water quality, flood and erosion risk management. Specifically policies NRM6 (coastal zone management) and NRM3 (sustainable flood risk management) require local planning authorities to take account of shoreline management plans. Importantly NRM6 advocates an integrated approach to coastal planning and management.
- On the penultimate sentence of the second paragraph it is suggested that there is a *tension* (rather than a *slight conflict* as the text suggests) between the requirements of PPG20 and development pattern in the SMP area.
- Also the reference to the South East Regional Plan should be replaced with Regional Planning Guidance.

The Beachy Head to Selsey Bill SMP

East Sussex County Council raises no particular strategic policy concerns on the draft proposals except where indicated in the table of detailed responses below.

The Land Use section page 17 is inadequate and out of date. It is suggested that the South Foreland paragraphs and the amendments above should be used as a model - particularly reference to the Sussex Coastal Towns Sub-regional strategy.

Landscape - the objective of the national park designation is to protect the landscape and enhance recreational opportunities with in the area. Beachy Head already forms part of the Sussex Downs Area of Outstanding Natural Beauty designation and is already accorded the highest protection.

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18 River Rother to Cliff End

A partially developed low lying area, of international nature conservation value, with Pett Levels in the west and shingle accumulations against Rye Harbour terminal groyne in the east. The recommended policy is to **Hold the Line** throughout the frontage for the life of the defence scheme that is currently being constructed, i.e. 50 years. In the long term a policy of **Managed Realignment** is recommended to realise potential environmental, engineering and coastal process benefits.

Ongoing improvements to the existing defences will reduce flooding risks to properties at Cliff End and Winchelsea Beach, together with important environmental areas and other assets such as the coastal road and the Royal Military Canal. Over the life of these defences the beach between Winchelsea Beach and Cliff End will narrow due to sea level rise and a lack of natural sediment inputs, making defence maintenance increasingly difficult.

The recommendation to realign in the long term will avoid the need to construct substantial hard defences, to compensate for the eventual loss of the beach, as these would have significant cost and environmental implications. No specific realignment position has been defined under the SMP (this will be addressed by separate study), although greatest engineering and environmental benefits will be realised if the coast is allowed to retreat to the raised ground along Wickham Cliff, Friars Cliff, etc., behind Pett Levels.

There is uncertainty regarding how this area will tie in with the set-back defences west of Winchelsea Beach. However, to achieve the benefits of allowing the coast to retreat it is anticipated that there would be a managed loss of developments close to the current coast. To limit the extent of flood

This is an important coastal cell because the future coastal management policies will have a major impact on the economic viability of Rye and Camber. The maintenance of the Rye harbour breakwater is important to the navigation of Rye harbour which has a small fishing fleet. It also helps to maintain Camber as the largest sandy beach on this stretch of coast which is a significant tourist attraction.

Rye Harbour Nature Reserve and Pett Levels are sites of international environmental importance and the Royal Military Canal is a substantial heritage asset.

The recommended policy of **Hold the Line** for the short and medium term horizons is strongly supported. However, whilst there could be significant environmental gains in the long term from a proposal of **Managed Realignment**, the case for this policy approach is not considered to have been made at this stage taking all the social, economic and environmental factors into account. It is suggested that this work cannot be done without better knowledge of the trends of sea level rise and shoreline sedimentation. This is unlikely to be achievable until the medium term horizon.

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propagation secondary defences would be constructed.

Although, long term losses will include houses, tourist facilities, roads, agricultural land, part of the Royal Military Canal and freshwater habitat, the benefits include creating a coast that will not require ever increasing expenditure to maintain in the coming centuries, together with the creation of important brackish and saline habitats. These and coastal process benefits make this the appropriate policy.

A possible variation on the implementation of this policy would be the managed removal of part of the terminal groyne, at the end of the western harbour arm. This would facilitate the movement of accumulated shingle onto the coast to the east providing coastal process and environmental benefits. However the potential to affect Rye Harbour navigation means that this process would need to be carefully investigated and then heavily controlled if it were promoted.

19. Cliff End to Fairlight Cove

A cliffed frontage of geological, biological and landscape importance, with scattered cliff top development. The long term policy here is to continue with No Active Intervention, and allow ongoing natural erosion of the cliffs. This policy will maintain the cliff exposures of geological and geomorphological importance, and the landscape quality of the frontage. It will also maintain an input of beach forming sediment to the foreshore which will benefit this frontage, and the coast to the east. With cliff top retreat anticipated to be up to 100m over the next century there will be some loss of properties at Cliff End, together with areas of agricultural land and the need to re-route part of the Saxon Shore Way coast path.

Fairlight Parish Council raises the issue of the loss of property as a result of this policy approach. The relevance of the Human Rights Act 1998 and the question of compensation need to be addressed by DEFRA.

Notwithstanding this, It is important that the rate of erosion is regularly monitored and reported on to enable the local authorities, utilities and landowners to make timely well-informed decisions.

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20. Fairlight Cove East

This unit covers the section of the cliff top village frontage that has a cliff toe defence structure in place to limit erosion. The cliffs are important for their geology. The long term policy here is to allow **Managed Realignment** of the cliffs, through maintenance of the rock bund defence in its present form. It is anticipated that this approach will retain the rock structure on the foreshore for over 100 years, although its effectiveness will reduce over time with sea level rise. This will result in increased erosion of the backing cliff, which will ensure the geological value of the cliffs is maintained. This approach will involve the loss of some cliff top properties, although the number will be significantly reduced by the rock defences.

Fairlight Parish Council raises the issue of the loss of property as a result of this policy approach. The relevance of the Human Rights Act 1998 and the question of compensation need to be addressed by DEFRA.

Notwithstanding this, It is important that the rate of erosion is regularly monitored and reported on to enable the local authorities, utilities and landowners to make timely well-informed decisions.

21 Fairlight Cove Central

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This unit covers the section of the cliff top village fronted by currently active landsliding cliffs, which are of importance for their geological exposures. Recently there has been rapid retreat of the cliff top adjacent to Rockmead Road due to a landslide event which is now settling, and retreat is projected to return to the slower historic rates in the coming years. The complexity of the landslide on this section would make it difficult to stabilise the cliff in its present position as both toe protection and slope drainage could be required, at considerable expense. It may be that the cost of such works is greater than the value of the assets they would protect and as such may not be economically worthwhile.

The policy here is to undertake **Managed Realignment** in the short term to further reduce the rate of cliff top retreat. The viability and nature of any possible management solutions to reduce the risks to cliff top properties in this unit are being considered by an ongoing detailed study. These may include measures to reduce the rate of slope retreat and erosion at the toe, although any recommendation will need to demonstrate environmental acceptability and may not attract central Government funding. However, it is recognised that there will be ongoing property loss of this frontage under this policy, although at a possibly reduced rate. The longer term policy is for **No Active Intervention**, allowing cliff top retreat to continue, with further long term property losses. Allowing continued erosion will maintain the geological value of the frontage and continue to provide a source of beach material to the shoreline.

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Fairlight Parish Council raises the issue of the loss of property as a result of this policy approach. The relevance of the Human Rights Act 1998 and the question of compensation need to be addressed by DEFRA.

Notwithstanding this, It is important that the rate of erosion is regularly monitored and reported on to enable the local authorities, utilities and landowners to make timely well-informed decisions.

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2 Cuckmere Haven

A low lying estuary valley system with extensive intertidal habitats, Cuckmere haven, is bordered by steep slopes and high cliffs. This area is geologically, geomorphologically and biologically important and forms part of the Seaford to Beachy head SSSI, as well as being of significant amenity value. The long term policy for this frontage is to allow the existing defences to fail and natural process to resume (**No Active Intervention**) to sustain the important environmental assets and restore a free functioning coast. However, it is recommended that **Managed Realignment** be undertaken in the short term to allow necessary management measures, such as maintaining the west training wall and continuing with beach recycling, while further studies are undertaken to manage the transition from a protected to undefended frontage.

This coastal cell covers the Seven Sisters Country Park which is owned by the County Council and managed by the Sussex Downs Conservation Board. The park is an iconic landscape feature set in the South Downs Area of Outstanding Natural Beauty and attracts over 300,000 visitors a year.

The proposed coastal management policies for this cell are also likely to affect the A259 Newhaven to Eastbourne Principal road and a number of well-used public rights of way. Fluvial flooding of East Dean and Alfriston occurs reasonably regularly and land drainage, river and coastal management are all inter-linked.

The potential environmental benefits of a **Managed Realignment** policy followed by **No Active Intervention** are recognised and would accord with the County Council's current aims. However, before such a coastal management strategy for this cell could be supported, the Strategic Environmental Assessment (SEA) currently being undertaken for future management of the estuary needs to be completed. This will include a comprehensive socio-economic and engineering study, flood risk assessment and environmental, landscape and archaeological studies, access and recreation

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	<p>assessments to ensure that all the implications of the proposed SMP policy are understood and able to be fully considered. One particular point is that the savings in management of the sea defences should not be at the cost of major infrastructure investment needs for the A259 causeway, Exceat bridge nor flood defence for the local communities of Alfriston and East Dean.</p> <p>Findings from the SEA and the Cuckmere and Sussex Havens Catchment Flood Management Plan (CFMP) will be incorporated.</p>
<p>5 Seaford (Tide Mills) to Newhaven Harbour</p>	
<p>The largely low-lying frontage of Tide Mills would benefit from the long-term policy of Managed Realignment by allowing the beach to retreat in a free functioning manner, and with that the formation of a wide shingle beach. There are no assets at risk but appropriate flood embankments at specified locations may be considered in the future to limit the extent of any flooding. The exact location of these would be determined through further studies.</p>	<p>Newhaven is an important commercial and manufacturing centre. Considerable public and private investment is being made in the town and port through local, regional and European funding. The maintenance of the port and its coastal defences are crucial for the future. The Managed Realignment proposals for the Tide Mills area do not appear to have considered the effect on the eastern harbour area, its future development and the archaeological sites associated with Tide Mills. Thus the proposals for a Managed Realignment policy are not supported. Further study work needs to be undertaken on this cell taking into account the economic and planning policies for this area.</p> <p>The findings of the River Ouse to Seaford Head Coastal</p>

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Defence Strategy, currently being undertaken, need to be incorporated.

6 Newhaven Harbour and Ouse Valley

This major harbour development, with a wide trained channel and prominent breakwater is heavily urbanised with a large number of residential and commercial properties and infrastructure existing within the flood area. The long term policy for this unit is to **hold the Line** in order to protect and sustain these existing assets.

Hold the Line proposals for Newhaven port are strongly supported. (See above).

7 Newhaven Harbour to Peacehaven Heights

Based on current understanding of climate change and accelerating sea levels, the preferred long term technical policy is to manage the realignment of the coast through **No Active Intervention** along the cliff face in the short to medium term, but maintain a terminal structure at the eastern end to hold the beach in place, which limits cliff toe erosion. The current harbour breakwater acts to do this at present, but should it not be maintained, an alternative may be needed. As a consequence of this policy relation of the Downlands Caravan Park may be required.

Maintenance of the harbour breakwater is essential for the continuation of Newhaven port. It is essential that monitoring of the coastal processes in this area is undertaken in order that a long-term view of the breakwater and its maintenance can be planned.

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8 Peacehaven

Peacehaven is a large residential settlement situated on the cliff top with the A259 running in close proximity to the cliff edge. The cliffs themselves are nationally important geological features that are protected by a number of statutory designations, which place restrictions on the Council as owners.

Considerable property and infrastructure are at risk from cliff erosion. The proposal to maintain the existing sea defences, under **Hold the Line** in the short and medium term is strongly supported. Also the proposal for regular monitoring of the processes is fully supported.

There has been a history of cliff erosion, along this frontage, and for the last century coastal defences have been used to slow the marine erosion of the cliff face. While this has had some success at stopping the cliff base from eroding, records show that the cliff top has still eroded landwards due to weathering of the cliff face. Studies show that this weathering process is likely to increase due to climate change, with cliff falls occurring more frequently. This mechanism of 'cliff retreat', while inherent to the quality of the geological interest, does place significant 'assets' at risk along this frontage: not only lengths of the A259 (the main link to these communities) but also properties and trunk services. Thus difficult long term choices after 2050 will need to be made between, accepting the loss of valuable cliff top property and infrastructure assets and the considerable cost of replacing them elsewhere, or on the other hand, accepting the considerable environmental and financial costs of strengthening coast defences to protect those assets.

The County Council would like to see the long term policy being **Hold the Line** for this built-up stretch of coast, but recognizes the need for closer study and monitoring of the processes to inform the key stakeholders of all the long-term issues which are not fully known at present.

In the long term, the issue of any loss of property as a result of adopting a non-intervention policy and the question of compensation need to be addressed by DEFRA, particularly with regard to the relevance of the Human Rights Act 1998.

In the short to medium term (the first 50 years) the SMP recommends the more appropriate policy **of holding the existing defences** to offer some protection to those cliff top assets at risk by holding the cliff base. This will not stop cliff top recession as the cliff degrades back through natural weathering, but these processes may well be slowed. However risks to properties and infrastructure will remain. Through an appropriately detailed cliff monitoring programme, informed

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decisions on how to manage those risks in the long term can be made.

9 Telscombe Cliffs

This is a length of cliff top that is relatively undeveloped between the settlements of Peacehaven and Rottingdean. Given that there are currently no defences here and that natural processes are allowed to occur, the recommended policy for this section is one of **No Active Intervention**. As a consequence of this policy there are no cliff top assets at risk from loss, however management of the Portobello outfall defences will be required and the coastal footpath would probably need re-routing at some point.

The proposal for **No Active Intervention** is not understood. There are important infrastructure assets at risk and the long term effect on these needs to be fully understood.

10 Saltdean to Rottingdean

As detailed in Units 8 and 11 there has been a history of cliff erosion along this frontage, and for the last century coastal defences have been used to slow the marine erosion of the cliff face. The cliffs themselves are nationally important geological features that are protected by a number of statutory designations, which place restrictions on the Council as owners.

While defences have had some success at stopping the cliff base from eroding, records show that the cliff top has still eroded landwards due to weathering of the cliff face putting properties and infrastructure assets at risk. The defences that exist along the cliff base are expected to last another 50 years if appropriately maintained,

The same comment applies here as to the Peacehaven cell.

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and are expected to limit the marine erosion of the base of the cliffs. Thus the SMP recommends that in the short to medium term (the first 50 years) ***holding the cliff base*** is the more appropriate policy, as managing and sustaining the existing defences will offer some protection to cliff top assets. This policy may lead to the narrowing and loss of beaches in front of the defences.

For the longer term a technically feasible and environmentally acceptable management practice for these cliffs balanced against sustaining the existing infrastructure and communities on the cliff top has to be developed (for 50 to 100 years from now). This can be planned for through an in-depth understanding of the weathering and erosion processes occurring along this frontage and how they are likely to increase due to climate change. Thus the SMP recommends that for the short to medium term, a number of studies, appropriately detailed, be undertaken in order to better understand the cliffs behaviour and reaction to the changing climate. This information can then be used to assist in the future management of the cliffs and how to deal with any assets at risk along the cliff top.

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