



Isle of Wight Shoreline Management Plan 2

Appendix M – Statement of Environmental Particulars

Isle of Wight Council

January 2011

Final Report

9V8288 / 01



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M1 INTRODUCTION

M1.1.1 This Statement of Environmental Particulars (SoEP) indicates how environmental considerations and the views of interested parties (consultees) were taken into account during the preparation of the second Shoreline Management Plan (SMP2) for the Isle of Wight. It explains how the Isle of Wight Council and their partners (Environment Agency, Natural England, English Heritage, and other organisations) selected the preferred options within the plan. This statement goes on to describe the proposed mitigation and monitoring procedures that have been set in place in order to successfully manage and monitor the significant environmental effects of implementing the plan.

M1.2 Purpose of this SEA Statement of Environmental Particulars

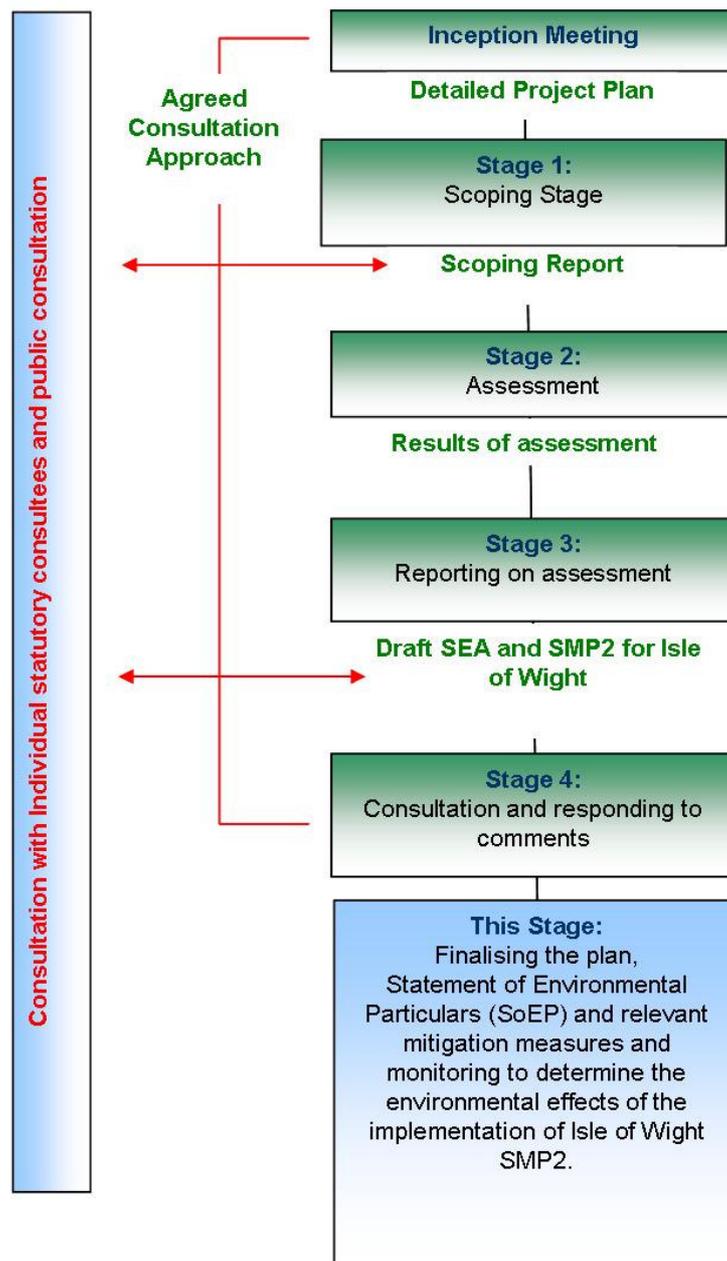
M1.2.1 This SoEP is the final stage of the Strategic Environmental Assessment (SEA; refer to **Figure 1.1**), that is a requirement under the SEA Directive 2001/42/EC, and which is transposed into United Kingdom law by the Environmental Assessment of Plans and Programmes Regulations (SI 1633) 2004. Regulation 16 (4) of the SEA Regulations states that the 'Environmental Particulars' are:

- a. *how environmental considerations have been integrated into the plan or programme;*
- b. *how the environmental report has been taken into account;*
- c. *how opinions expressed in response to -*
 - i. *the invitation referred to in regulation 13(2)(d);*
 - ii. *action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;*
- d. *how the results of any consultations entered into under regulation 14(4) have been taken into account;*
- e. *the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and*
- f. *the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*

M1.2.2 In other words, it sets out how the findings of the SEA have been taken into account and how views expressed during the consultation period have been considered as the Isle of Wight SMP2 has been finalised. In addition, this SoEP re-assesses policies and assessments where necessary, as it has had to take into account the revisions to the updated Habitats Regulations Assessment (HRA) and comments from key stakeholders. The specific points addressed within this SoEP include:

- Reassessment of some policy effects for Policy Development Zones (PDZs) (especially nature conservation features and heritage assets); and
- Clarification of the effects of policies upon features within the PDZs.

Figure 1.1 SEA Approach and Stages Undertaken for this SMP2



M1.2.3 This SoEP comprises eight sections, of which, this introduction forms **Section M1**. The remaining sections include:

- Section M2** Background to the Isle of Wight SMP2;
- Section M3** Alternatives
- Section M4** Integration of Environmental Considerations;
- Section M5** Influence of the Environmental Report and Consultation;
- Section M6** Summary of the Key Consultation Responses and Actions;
- Section M7** Environmental Monitoring Measures for the Implementation of this SMP2; and
- Section M8** References.

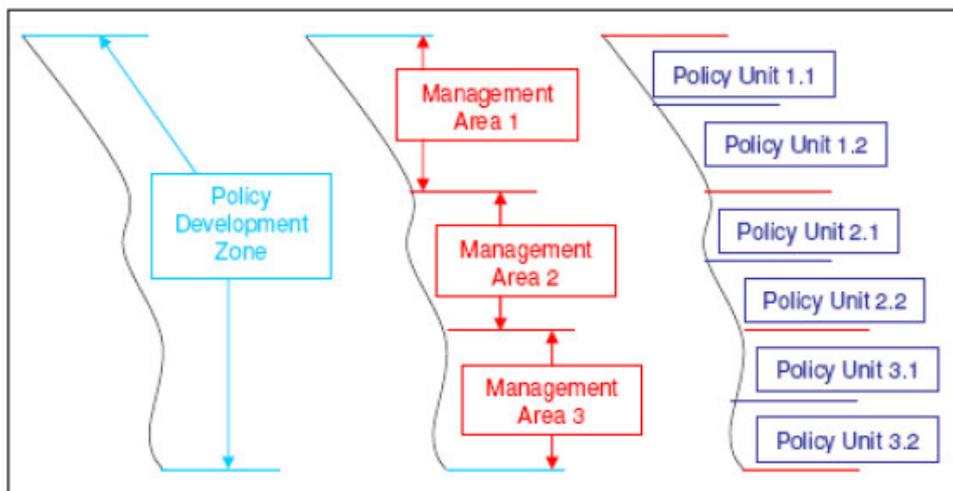
M2 BACKGROUND

M2.1 *The Isle of Wight Shoreline Management Plan 2*

M2.1.1 An SMP is a large-scale assessment of the risks associated with coastal processes and aims to reduce the risks to the social, economic, natural and historical environment through effective and sustainable shoreline management. The SMP for Isle of Wight addressed these issues in the context of its location.

M2.1.2 The Isle of Wight SMP2 is based on a division of the coast into seven PDZs and within each 'PDZ' the coast has been further sub-divided into a series of 'Management Areas' and within each of these management policies have been selected for a coordinated series of 'Policy Units', as schematised in Figure 2.1. The PDZ areas have also been illustrated in Figure 2.2. The aim of developing policy for individual units of the coast within the framework of the PDZ is to ensure a coordinated approach in that the broader implications of managing one Policy Unit with respect to another are considered; hence the scenario approach.

Figure 2.1 Schematic of SMP2 links between PDZ, MA and PU

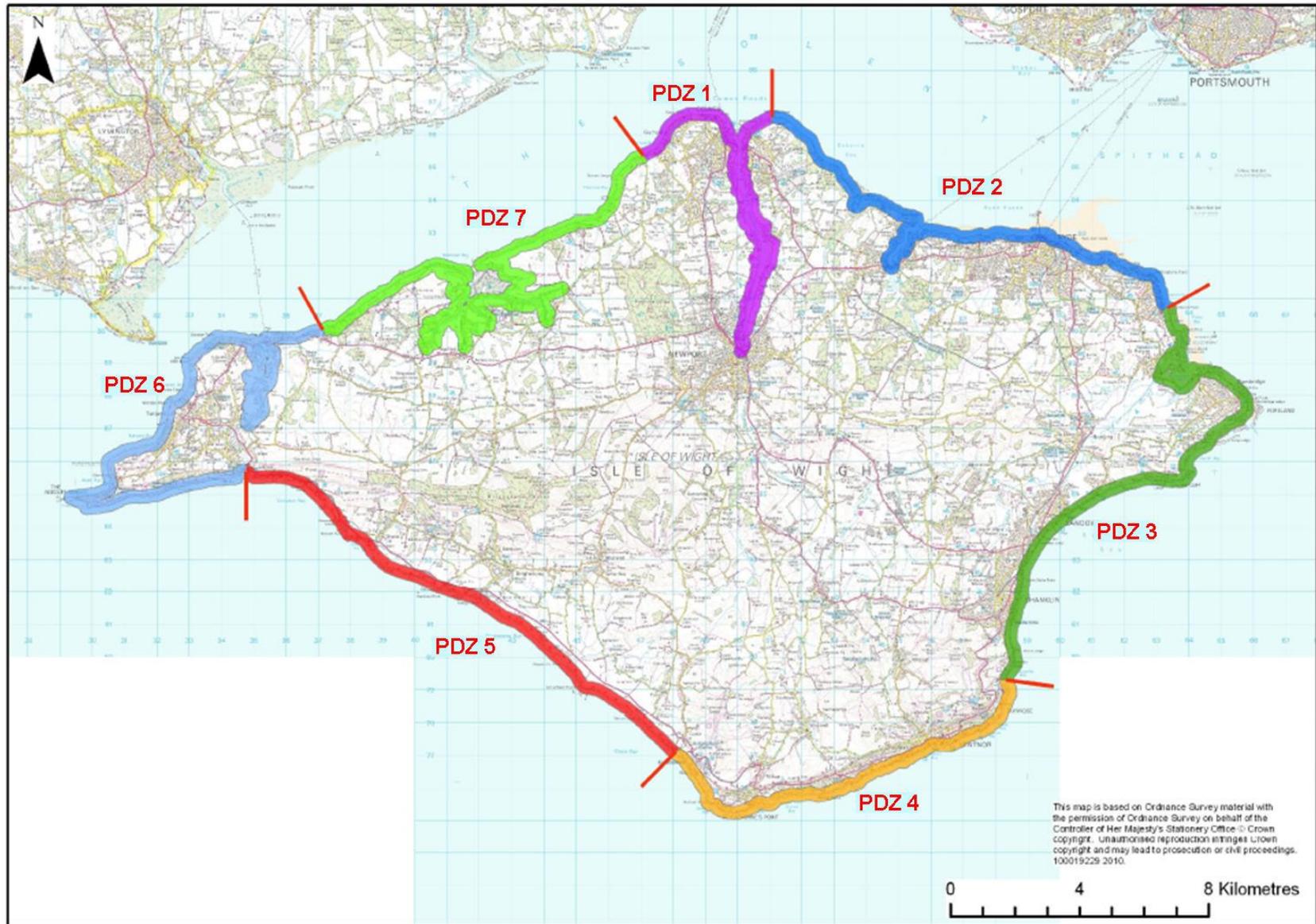


M2.1.3 Within each PDZ different scenarios were considered; always starting with the policy and consequences of 'No Active Intervention' (NAI) for all locations within the PDZ. This provides the baseline for considering the need or the sense in actively managing the coast. The second scenario is based on the policy developed from SMP1 (i.e. present management), taking into account further detail or modification which may have been developed during the following Strategy studies.

M2.1.4 There is appreciation that there may be a need for transition from present management through to the long term policy. This may be a result of a new policy being recommended, the maximum benefit being sought from existing defences, or it may be in recognition of the way in which the coast is likely to evolve. To allow adaptation there is scope within the SMP2 for changes in policy over time. Policy for each unit is therefore defined over three time periods or epochs:

- **Epoch 1** covers the period from the present day to 2025 (0-20 years: *short term*);
- **Epoch 2** from 2025 to 2055 (20-50 years: *medium term*); and
- **Epoch 3** from 2055 to 2105 (50-100 years: *long term*).

Figure 2.2 Boundaries of Isle of Wight SMP2 and PDZs (red lines and text)



M2.2 Strategic Environmental Assessment

M2.2.1 In order to ensure environmental considerations were integrated throughout the development of the SMP, a non-statutory SEA was undertaken following the requirements of the SEA Regulations and the Environment Agency's internal SEA procedure. This assessment seeks to ensure that any potentially significant effects of the SMP on the environment are considered throughout its development.

M2.2.2 Within the SEA process, and in a manner analogous to that used throughout the SMP process, the term 'environment' has been used to cover the following receptors (as defined in Environmental Assessment of Plans and Programmes Regulations, 2004):

- Human population and communities (including human health);
- Land use, infrastructure and material assets;
- Water quality and resources;
- Geology and soils;
- Landscape (refer to **Plate 2.1**);
- Biodiversity, habitats and species;
- Historic Environment (including architectural and archaeological heritage); and
- Air and climatic factors¹.

Plate 2.1 Tennyson Heritage Coast (Ventnor to Totland): A key receptor of the SMP2



M2.2.3 The SEA process for Isle of Wight SMP2 has included a Scoping Report, an Environmental Report (ER) and an Addendum to the SEA ER (**Appendix F** of the SMP).

¹ Air quality and climatic factors were scoped out as they will not be affected by the recommendations of the SMP2 policies. However, the SMP2 policies do take into consideration climate change adaptation through Defra's recommended allowances for sea level rise (refer to Section 4 of the SMP2 Main Report and Appendix D (Theme Review)).

M3 ALTERNATIVES

M3.1.1 The approach adopted in the final SMP2 was considered against a number of reasonable alternatives during its development. The policy options available under the SMP2 are outlined in **Table 3.1**.

Table 3.1 Options used in SMP development

SMP option	Description of Option
Hold the line (HTL)	Hold the existing defence line by maintaining or changing the standard of protection. This policy will cover those situations where work or operations are carried out in front of the existing defences (such as beach recharge, rebuilding the toe of a structure, building offshore breakwaters and so on), to improve or maintain the standard of protection provided by the existing defence line. This policy also includes other policies that involve operations to the back of existing defences (such as building secondary floodwalls) where they form an essential part of maintaining the current coastal defence system.
Advance the line (ATL)	Advance the existing defence line by building new defences on the seaward side of the original defences. Using this policy should be limited to those policy units where significant land reclamation is considered.
Managed realignment (MR)	Managed realignment by allowing the shoreline to move backwards or forwards, with management to control or limit movement (such as reducing erosion or building new defences on the landward side of the original defences).
No active intervention (NAI)	No active intervention, where there is no investment in coastal defences or operations.

M3.1.2 When considered in relation to the PDZs, policy options were ruled out immediately if they were not applicable or if it was obvious that there were no clear drivers but significant constraints (for example *Natura 2000* sites). This was the case for Advance the Line policies, as well as HTL policies. The major reasons for selecting the adopted plan over the reasonable alternatives are shown in the **Table 3.2** below.

M3.1.3 Further details on the selection of the preferred policy options, which was developed into the adopted plan are presented in detail its SEA Environmental Report (**Appendix F**), as well as in Chapter 4 and Appendix G of the SMP2 document. Information on how to access a copy of the environmental report can be found in the post-adoption statement, which can be found at <http://www.coastalwight.gov.uk/smp/contents.htm>

Table 3.2 Reasons for selecting the adopted plan in light of reasonable alternatives

SMP2 Policies				Epoch 1	Epoch 2	Epoch 3	Reasons for selecting the adopted plan in light of reasonable alternatives
PDZ	MAN	PU	Policy Name	0-20 yrs	20-50 yrs	50-100 yrs	
1	MAN1A	PU1A.1	Gurnard Luck	HTL	NAI	NAI	<p>The policy suite is to ensure continued protection around and within the mouth of the Medina Estuary through HTL, whilst allowing natural processes to continue along some of the coast through NAI. The policy plan of HTL is to continue to provide protection to the recreation play area, properties and road around Gurnard (PU1A.1) in the short term, as well as around the community properties, assets, infrastructure and heritage assets of Cowes and East Cowes (PU's 1A.3, 1A.4 and 1A.4).</p> <p>NAI will allow natural erosion and flooding and encourage natural geomorphological evolution, with the potential to maintain the sandy intertidal foreshore (UK BAP habitat), ensure the integrity of the Solent Maritime SAC, maintain and improve the natural environmental features of the Isle of Wight AONB and for the creation of internationally and nationally important intertidal habitat (e.g. saltmarsh and mudflat) in newly inundated areas.</p>
		PU1A.2	Gurnard Cliff	NAI	NAI	NAI	
		PU1A.3	Gurnard to Cowes Parade	HTL	HTL	HTL	
		PU1A.4	West Cowes	HTL	HTL	HTL	
		PU1A.5	East Cowes	HTL	HTL	HTL	
		PU1A.6	East Cowes Outer Esplanade	HTL	NAI	NAI	
	MAN1B	PU1B.1	Central Medina NW	NAI	NAI	NAI	<p>For the central and inner parts of the Medina Estuary, the long-term policy is NAI across the wider estuary with HTL used selectively at West Medina Mills and Newport Harbour to provide continued defence to maintain the important industrial and commercial properties and protect Newport harbour and town (including a large number of Listing Buildings) from tidal flooding. NAI will ensure nature conservation interests associated with mudflat, saltmarsh and club rush BAP habitats (also features of the Solent Maritime SAC and support important bird populations that are features of the Solent and Southampton Water SPA and Ramsar sites) are maintained through promoting natural processes, which enable adaptation to sea level rise.</p>
		PU1B.2	West Medina Mills	HTL	HTL	HTL	
		PU1B.3	Central Medina SW	NAI	NAI	NAI	
		PU1B.4	Newport Harbour	HTL	HTL	HTL	
		PU1B.5	Central Medina East	NAI	NAI	NAI	
2	MAN2A	PU2A.1	Osborne Bay	NAI	NAI	NAI	<p>The policy for Osbourne Bay to Woodside in the long-term is for NAI for the entire length, which will benefit biodiversity interests including nature conservation features of the Solent Maritime SAC (mudflat, sandflat and seagrass), Solent and Southampton Water SPA and Ramsar sites (associated bird populations), King's Quay Shore SSSI, BAP habitats (e.g. ancient woodland, ancient woodland plantation, sandflats, mudflats, saltmarsh, vegetated shingle, coastal scrub and</p>
		PU2A.2	Woodside	NAI	NAI	NAI	

SMP2 Policies				Epoch 1	Epoch 2	Epoch 3	Reasons for selecting the adopted plan in light of reasonable alternatives
PDZ	MAN	PU	Policy Name	0-20 yrs	20-50 yrs	50-100 yrs	
							swamps), as well as the Isle of Wight AONB (including the Osbourne Coast and Traditional Enclosed Pasture Land LCA) by allowing them to respond naturally to erosion and sea level rise without the constraint of defences.
	MAN2B	PU2B.1	Western Wootton Creek	NAI	NAI	NAI	<p>The long-term policy plan for Wootton Creek is to allow the estuary to evolve as naturally as possible through policies of NAI and MR, with HTL policy used selectively around the village of Wootton (particularly properties near Barge Lane, including three Grade II Listed Buildings), the Fishbourne ferry (a key regional ferry link between the Isle of Wight and Portsmouth), and to the east of the ferry terminal in the short to medium term to ensure the continued protection of residential properties, assets and infrastructure are protected. NAI² is the chosen policy in the central estuary which will benefit the internationally and nationally important mudflats (a BAP habitat) of conservation interest for the Solent and Southampton Water SPA and Ramsar sites, and Ryde Sands and Wootton Creek SSSI.</p> <p>The MR policy at Wootton Bridge will allow the gradual return to a more sustainable natural environment within the Old Mill Pond, with significant benefits for nature conservation (i.e. mudflats and saltmarsh) by increasing biodiversity and create a range of habitats of conservation interest. More regular exposure of the mudflats south of Wootton Bridge would attract greater numbers of wetland birds.</p> <p>To the east of Wootton Creek, the coast from Quarr to Binstead will be allowed to continue to erode and adjust naturally to sea level rise with a policy of NAI which will not only benefit the nature conservation interests (SPA, Ramsar and SSSI) and Isle of Wight AONB by allowing the coastline to evolve naturally, but will ensure continued sediment accretion of the shingle spit at Quarr, as well as to Ryde Sands to the east.</p>
		PU2B.2	South-west Wootton Creek	HTL	HTL	HTL	
		PU2B.3	Old Mill Pond	MR	MR	MR	
		PU2B.4	South-east Wootton Creek	HTL	HTL	HTL	
		PU2B.5	Eastern Wootton Creek	NAI	NAI	NAI	
		PU2B.6	Fishbourne Ferry Terminal	HTL	HTL	HTL	
		PU2B.7	Outer Eastern Creek	HTL	HTL	MR	
		PU2B.8	Quarr and Binstead	NAI	NAI	NAI	
	MAN2C	PU2C.1	Ryde	HTL	HTL	HTL	The long-term policy of HTL along the Ryde frontage around to Seagrove Bay is to continue to provide protection for the residential and commercial (in particular tourism) properties and associated infrastructure (ferry, rail and road) and assets
		PU2C.2	Appley and Puckpool	HTL	HTL	HTL	

² NAI does not preclude the right for private defences to protect properties.

SMP2 Policies				Epoch 1	Epoch 2	Epoch 3	Reasons for selecting the adopted plan in light of reasonable alternatives
PDZ	MAN	PU	Policy Name	0-20 yrs	20-50 yrs	50-100 yrs	
		PU2C.3	Springvale to Seaview	HTL	HTL	HTL	(e.g. Appley Park sewage works) from coastal flooding, which in turn maintains the integrity of the water quality along the coast. Furthermore, it will provide protection to a number of designated heritage assets (e.g. Appley Tower Listed Building and Puckpool Mortar Battery Scheduled Monument) and the landward saline lagoons and coastal grazing marsh at Spring Vale (as long as the defences are increased in line with sea level rise). Providing cliff erosion continues along the coast to the west (i.e. Osbourne Bay to Woodside, and Quarr and Binstead), then Ryde Sands will continue to accrete.
		PU2C.4	Seagrove Bay	HTL	HTL	HTL	
3	MAN3A	PU3A.1	Priory Bay	NAI	NAI	NAI	<p>The long-term policy for Priory Bay is to allow the coastline to naturally evolve with a policy of NAI, which will benefit the intertidal and marine nature conservation interests. The limestone rocky ledges and seagrass areas will be able to be move landward, thus maintaining features of the Brading Marshes to St Helen's Ledges SSSI (rocky ledges) and Solent and Southampton Water Ramsar site (sandflats and seagrass beds)), and BAP habitats (coastal scrub, sandflats and rocky shores). The erosion of Priory Woods SSSI would maintain the geological features (Pleistocene gravels).</p> <p>The long-term policy for Bembridge Harbour is to predominantly HTL, with MR in the long term for St. Helen's Duver, and NAI at Bembridge Point to allow the continuation of natural coastal processes along the beach and the sand dunes. During Epoch 1 a new defence alignment will be defined that links Embankment Road (PU 3A.4) with higher ground at the back of Bembridge Point, which will provide a continuous defence to protect the residential and commercial properties that will be held in future epochs. The Duver defences will protect properties and assets from erosion. HTL will sustain the mudflats and saltmarsh on the harbour side, whilst keeping the sand dune stationary. In the long-term the MR of the spit would allow for a more natural system with the creation of further sandflats enable the sand dunes to move landward, thus benefiting Brading Marshes to St Helen's Ledges SSSI, the Solent and Southampton Water SPA and Ramsar sites, and BAP habitats (sandflats, sand dunes, vegetated shingle, mudflats and saltmarsh).</p> <p>The long-term HTL policy along St. Helen's and Embankment Road will ensure the protection of the residential and commercial properties on both the landward sides</p>
		PU3A.2	St Helens Duver	HTL	HTL	MR	
		PU3A.3	St Helens	HTL	HTL	HTL	
		PU3A.4	Embankment Road	HTL	HTL	HTL	
		PU3A.5	Bembridge Point	NAI	NAI	NAI	

SMP2 Policies				Epoch 1	Epoch 2	Epoch 3	Reasons for selecting the adopted plan in light of reasonable alternatives
PDZ	MAN	PU	Policy Name	0-20 yrs	20-50 yrs	50-100 yrs	
	MAN3B	PU3B.1	Bembridge	NAI	NAI	NAI	of the harbour, as well as maintaining access to the Foreland at Bembridge. Raising and maintaining Embankment Road means that the landward designated saline lagoons (Solent and Isle of Wight Lagoons SAC), coastal grazing marsh and freshwater habitats (conservation interests of the Brading Marshes to St Helen's Ledges SSSI, and Solent and Southampton Water SPA and Ramsar sites, and also BAP habitats), will continue to be protected from saline inundation. The NAI policy around Bembridge Point and the MR of St Helen's Duver in the long term will allow the harbour to function more sustainably and continue to evolve and accrete more naturally.
		PU3B.2	Lane End	HTL	HTL	MR	The long-term policy for the majority of the coastline is NAI so that it can evolve naturally (PUs 3B.1 & 3B.5), with selective HTL policies in the short to medium term for Land End and Foreland Fields (PUs 3B.2 & 3B.4) with MR in the long term. Foreland is to have a policy of MR for all three epochs. The NAI policy with benefit various sites designated for either geological or nature conservation interest which are reliant on natural processes, including, South Wight Maritime SAC, Solent and Southampton SPA and Ramsar site, Whitecliff Bay and Bembridge Ledges SSSI, Bembridge School and Cliffs SSSI, Bembridge Down SSSI, BAP habitats (rocky intertidal shores, sandflats and coastal scrub) and the Isle of Wight AONB (Chalk Downs). Where the policy is to HTL in the short to medium term this will ensure that properties and assets are protected, with a policy of MR (potentially using beach recharge) to slow erosion with the aim of maintaining the residential properties and tourism assets where possible in the long-term.
		PU3B.3	Foreland	MR	MR	MR	
		PU3B.4	Foreland Fields	HTL	HTL	MR	
		PU3B.5	Whitecliff Bay	NAI	NAI	NAI	
	MAN3C	PU3C.1	Culver Cliff & Red Cliff	NAI	NAI	NAI	
	PU3C.2	Yaverland and Eastern Yar Valley	HTL	HTL	HTL		
	PU3C.3	Sandown and Shanklin	HTL	HTL	HTL		

SMP2 Policies				Epoch 1	Epoch 2	Epoch 3	Reasons for selecting the adopted plan in light of reasonable alternatives
PDZ	MAN	PU	Policy Name	0-20 yrs	20-50 yrs	50-100 yrs	
		PU3C.4	Luccombe	NAI	NAI	NAI	<p>SAC, Whitecliff Bay and Bembridge Ledges SSSI and Bembridge Down SSSI, as well as maintaining the natural landscape (Isle of Wight AONB) and the source of the sediment supply for Sandown Bay to continue.</p> <p>The HTL policies along the majority of this management unit will ensure that the communities of Shanklin and Sandown are protected from coastal erosion and flooding, along with important infrastructure (e.g. sewage works, railway line and coastal road i.e. Yaverland Road, Culver Parade, Esplanade, Cliff Path) and tourism assets (e.g. Esplanade Gardens Café, Carlton Hotel, Royal Hadleigh Hotel, Lake Cliff Gardens, museum, and the Isle of Wight Zoo). Furthermore, the HTL policies will ensure that historic assets are protected including the Sandown Barrack Battery SM, and the Hot Brine Bath and the Chalet Café (both Grade II Listed Buildings).</p>
4	MAN4A	PU4A.1	Dunnose	NAI	NAI	NAI	<p>The long term policy along the undefended Dunnose frontage is to continue with a policy of NAI, which will allow natural processes to prevail benefiting the Isle of Wight AONB, The Undercliff Landscape Character Area, South Wight Maritime SAC, Bonchurch Landslips SSSI and BAP habitats (e.g. coastal scrub and rocky shores).</p> <p>The long term policy for the majority of this management unit along the Bonchurch and Ventnor frontage is to HTL so as to protect the foot of the cliffs from coastal erosion and aid in preventing any further land slides that are prevalent along this stretch. This will ensure that the residential and commercial properties, infrastructure (roads), community assets (e.g. restaurants along the Esplanade, Bonchurch Pottery, The Beach Café at Bonchurch and The Breakwaters) and one heritage asset (The Beach Hotel Listed Building) are maintained.</p>
		PU4A.2	Ventnor & Bonchurch	HTL	HTL	HTL	
	MAN4B	PU4B.1	St Lawrence Undercliff	NAI	NAI	NAI	<p>Where the coastline is currently undefended, the long-term policy for the majority of this management unit is NAI, which will allow natural processes to continue. Whilst for the short section of coast at Castlehaven, the policy is to HTL in the short to medium-term, and then to minimise cliff retreat through MR in the long-term. The wider NAI policy will allow the continued natural evolution of the maritime cliffs and associated rocky shores beneath, thus maintaining the integrity of the Isle of Wight AONB, Tennyson Heritage Coast, The Undercliff Landscape Character Area, the</p>
		PU4B.2	Castlehaven	HTL	HTL	MR	
		PU4B.3	St Catherines and Blackgang	NAI	NAI	NAI	

SMP2 Policies				Epoch 1	Epoch 2	Epoch 3	Reasons for selecting the adopted plan in light of reasonable alternatives
PDZ	MAN	PU	Policy Name	0-20 yrs	20-50 yrs	50-100 yrs	
							<p>South Wight Maritime SAC (features include maritime cliffs and rocky shores), Compton Chine to Steephill Cove SSSI (geological and biological) and BAP habitats (coastal scrub and rocky intertidal shores).</p> <p>The HTL at Castlehaven will maintain the integrity of this community, its associated infrastructure and designated heritage assets, whilst preparing for adaptation to take place if MR is not a possibility if the slope stability conditions are not stable.</p>
5	MAN5	PU5.1	Central Chale Bay to Compton Bay	NAI	NAI	NAI	<p>The policy for Chale Bay to Afton Down in the long-term is for NAI for the entire length, which will benefit the geological and biodiversity interests including nature conservation features (reefs and cliffs) of the South Wight Maritime SAC, Compton Chine to Steephill Cove SSSI, Compton Down SSSI, BAP habitats (e.g. rocky shores, maritime grassland and coastal scrub above the cliffs), Isle of Wight AONB, and Tennyson Heritage Coast by allowing them to respond naturally to erosion and sea level rise.</p>
6	MAN6A	PU6A.1	Freshwater Bay	HTL	HTL	HTL	<p>The long-term policy for this management area is to HTL at Freshwater Bay, whilst allowing the remaining coast from Freshwater Bay round to Totland to be exposed to natural processes with a policy of NAI. The HTL policy will provide protection for the community and tourism assets (two Hotels e.g. Albion Hotel) of Freshwater Bay from flooding and connecting through to the Western Yar Valley (PU6A.1 connecting with PU6C.3), as well as maintaining the transport infrastructure (Gate Lane and where it links with the coastal road (A3055) of Freshwater Bay) and supporting the landward protective beach. The NAI policy will continue to allow natural change with episodic rock falls along the resistant cliff line followed by periods of inactivity, thus allowing the natural evolution of internationally designated reefs, sea caves and vegetated cliffs of the South Wight Maritime SAC, Headon Warren & West High Down SSSI and BAP habitats (intertidal rocky shores) to continue. This will also benefit the Isle of Wight AONB and Tennyson Heritage Coast.</p>
		PU6A.2	Tennyson Down, Alum Bay and Headon Warren	NAI	NAI	NAI	
	MAN6B	PU6B.1	Totland and Colwell	HTL	HTL	HTL	<p>The long-term plan for this stretch of coastline is eventually for NAI across the majority of the coastline with HTL to protect the settlements of Totland and Colwell. The short to medium-term the policy is HTL to protect Fort Albert (PU6B.3) and the village of Norton (PU6B.5). The HTL policy will protect the majority of properties,</p>
		PU6B.2	Central Colwell Bay	NAI	NAI	NAI	

SMP2 Policies				Epoch 1	Epoch 2	Epoch 3	Reasons for selecting the adopted plan in light of reasonable alternatives
PDZ	MAN	PU	Policy Name	0-20 yrs	20-50 yrs	50-100 yrs	
		PU6B.3	Fort Albert	HTL	HTL	NAI	<p>infrastructure (residential roads and access to the beach), tourism assets, the Yarmouth to Brightstone coastal path and some designated historic assets such as Fort Albert (Grade II* Listed Building). HTL around Sconce Point and Norton ensures that the few properties and assets at risk of loss are protected in the short term.</p> <p>Geological and nature conservation interests that are dependant upon natural processes will benefit from the policies of NAI, particularly since allowing the cliffs to erode and slump naturally ensures a vital source of sediment continues to be supplied for areas further along the coast. The designated sites that will benefit will be Colwell Bay SSSI and the Solent Maritime SAC.</p>
		PU6B.4	Fort Victoria Country Park	NAI	NAI	NAI	
		PU6B.5	Fort Victoria and Norton	HTL	NAI	NAI	
	MAN6C	PU6C.1	Norton Spit	HTL	HTL	HTL	<p>The long-term policy for the Western Yar Estuary is allow the estuary to continue to adapt naturally along undefended stretches through NAI, with HTL used selectively to protect the community properties and assets, heritage assets and infrastructure (including the Lymington ferry) of Yarmouth to Port la Salle and the entrance to the estuary (Norton Spit) from flooding, as well as maintaining the tidal limit at The Causeway (protecting the Freshwater Marshes SSSI, preventing a tidal breach between Yarmouth and Freshwater). A policy of suite of HTL, followed by MR and NAI for Thorley Brook and Barnfields Stream, is to allow the gradual opening up of these two previous tributaries of the estuary, so as to create further mudflat and saltmarsh habitats, and allow adaptation of the estuary as a whole to rising sea levels, benefiting the Solent and Southampton Water SPA and Ramsar site, Yar Estuary SSSI and BAP habitats.</p> <p>The NAI policy will allow natural processes to prevail, benefiting the nature conservation interests of the designated sites of the Solent Maritime SAC, Solent and Southampton Water SPA and Ramsar sites, Yar Estuary SSSI, as well as the Isle of Wight AONB.</p>
		PU6C.2	Western Yar Estuary - west	NAI	NAI	NAI	
		PU6C.3	The Causeway	HTL	HTL	HTL	
		PU6C.4	Western Yar Estuary - east	NAI	NAI	NAI	
		PU6C.5	Thorley Brook and Barnfields Stream	HTL	MR	NAI	
		PU6C.6	Yarmouth to Port la Salle	HTL	HTL	HTL	
7	MAN7	PU7.1	Bouldnor Copse and Hamstead	NAI	NAI	NAI	<p>The policy for Bouldnor Copse, Newtown Estuary and southern Gurnard Bay in the long-term is for NAI for the entire length, which will benefit the biodiversity interests</p>

SMP2 Policies				Epoch 1	Epoch 2	Epoch 3	Reasons for selecting the adopted plan in light of reasonable alternatives
PDZ	MAN	PU	Policy Name	0-20 yrs	20-50 yrs	50-100 yrs	
		PU7.2	Newtown Estuary	NAI	NAI	NAI	including nature conservation designations of the Solent Maritime SAC, Solent and Southampton Water SPA and Ramsar sites, Bouldnor and Hamstead Cliffs SSSI, Newtown Harbour SSSI, Thorness Bay SSSI, BAP habitats (e.g. sandflats, mudflats, saltmarsh, saline lagoons, coastal grazing marsh, vegetated shingle), Isle of Wight AONB, and Hamstead Heritage Coast by allowing them to respond naturally to erosion and sea level rise.
		PU7.3	Thorness Bay and southern Gurnard Bay	NAI	NAI	NAI	

M4 INTEGRATION OF ENVIRONMENTAL CONSIDERATIONS

M4.1 Introduction

M4.1.1 The decision to provide a stand-alone SEA for Isle of Wight SMP2 was taken after the commencement of the SMP2 process in 2006. A detailed account of how environmental issues have shaped the development of policy in Isle of Wight SMP2 is provided in *Appendix G of the SMP – Scenario Testing*. Further to this policy appraisal process within the SMP2, the subsequent assessment of preferred policy options provided in the SEA ER ensured that a balanced approach was taken to selecting policies, which have the most beneficial outcomes for the environment (across the range of receptors specified) (refer to **Section M2**). The SEA process has developed two distinct documents: a Scoping Report in April 2010; and an Environmental Report in July 2010 (including the Addendum published in December 2010). These are described below. Furthermore, a summary of the Habitats Regulations Assessment and Water Framework Directive Assessment are summarised as they are integral to the SEA process.

M4.2 The SEA Scoping Report (April 2010)

M4.2.1 The Scoping Report established an environmental baseline for the coastline of Isle of Wight and in doing so informed the development of a series of SEA objectives, assessment criteria, indicators and targets by which SMP2 policies could be assessed.

M4.3 The SEA Environmental Report (July 2010)

M4.3.1 Following the completion of the Scoping Report (and accompanying consultation period) both the alternative and the preferred policy options for Isle of Wight SMP2 were assessed within the Environmental Report (ER). The detailed assessment of the effects of SMP2 policies was provided in **Annexes F-III and F-IV of the SEA ER**, where each policy option has been assessed for each policy unit (grouped by management area and PDZ) against the scoped in SEA receptors using the SEA assessment criteria. In the main ER, these were summarised into the positive and negative environmental outcomes of policy for each management area (rather than policy unit level) within each PDZ. On the basis of the assessment provided in the SEA ER, the Isle of Wight SMP2 was considered to have been successful in providing an overall balance of considering the range of environmental values. However, it was felt that the resultant policy tables and summary text were not clear enough in the ER with regard to the significance level of negative and positive effects expected. This has been clarified in the Addendum to the SEA ER (**Appendix M**), which was published for public consultation on the 7th December 2010.

M4.3.2 The mitigation actions have been incorporated into the SMP2 Action Plan (*Chapter 6*). Where there are statements regarding monitoring of features at risk, these are all included within the SMP2 Action Plan (*Chapter 6*) and **Section M7** of this SoEP.

M4.4 Summary of the HRA Stage 3: Appropriate Assessment (July 2010)

M4.4.1 The findings of the assessment of the preferred policy report that there was an adverse effect on only one European designated nature conservation site, the Solent and Southampton Water Ramsar site. However, following public consultation and discussions with Natural England it was deemed that in fact the Isle of Wight SMP2 will have an adverse effect on the integrity of two European nature conservation designated sites as a result of the policy at Yarmouth Mill and Thorley (PU6C.5). These sites are the Solent & Southampton Water Special Protection Area (SPA) and Ramsar sites for 31 hectares of coastal grazing marsh in Epoch 2. The loss of this coastal grazing marsh will also result in the potential loss

of seaward feeding and high tide roost sites important for internationally important wader and wildfowl bird species. The preferred policy for Policy Unit 6C.5 (Yarmouth Mill and Thorley) is to Hold The Line in the short term (Epoch 1), followed by Managed Realignment in the medium term (Epoch 2), and No Active Intervention in the long term (Epoch 3).

M4.5 Summary of the Water Framework Directive Assessment (July 2010)

M4.5.1 The WFD assessment (**Appendix J**) of the preferred SMP2 policies identified that four of the seven PDZs have the potential to contribute to the failure to meet Environmental Objective WFD2, with two PDZs having the potential to fail to meet Environmental Objective WFD3. The policies that cause the potential for failure are presented in **Table 4.4**.

Table 4.1 Summary of the policy units that have the potential to fail the WFD Environmental Objectives (HMWB = Heavily Modified Water Body; GEP = Good Ecological Potential)

Water Body	TraC Type	Designation	Current Ecological Status / Potential	Overall Objective	Policy Units against WFD 2	Policy Units against WFD 3
Solent	Coastal	HMWB	Moderate Potential	GEP by 2015	2B.6, 2B.7, 2C.4, 6B.1, 6B.3	
Medina Estuary	Transitional	HMWB	Moderate Potential	GEP by 2027	1A.4, 1A.5, 1B.2, 1B.4	1B.2, 1B.5
Wootton Creek	Transitional	HMWB	Moderate Potential	GEP by 2027	2B.2, 2B.4	
Eastern Yar	Transitional	HMWB	Moderate Potential	GEP by 2027	3A.3, 3A.4	
Western Yar	Transitional	HMWB	Moderate Potential	GEP by 2027	6C.3, 6C.6	6C.5

M4.5.2 It must be noted that this assessment is based upon a precautionary approach where it has been determined that there is potential for SMP2 policies to result in deterioration of Ecological Status or Potential of a water body and hence potential for failure to meet the WFD Environmental Objectives. Therefore, a precautionary check has been made against the conditions outlined in Article 4.7 of the Directive. The Summary Statements in *Section J3* of the WFDA outline the reasons behind selecting the preferred SMP2 policy and any relevant South East River Basin Management Plan mitigation measures that have been incorporated into policies, or that must be included in the SMP2 Action Plan so that all strategy or schemes incorporate these measures to ensure that Good Ecological Potential/Status is achieved or maintained by either 2015 or 2027 at the latest. The WFD assessment for the SMP is provided as **Appendix J**.

M4.6 Summary of the HRA Stage 4: IROPI (October 2010)

M4.6.1 Since the Appropriate Assessment concluded that the plan will lead to an adverse effect on the integrity of two European designated nature conservation sites through the loss of 31 hectares of coastal grazing marsh, then Stage 4 of the Habitats Regulations Assessment is required to be submitted to the Secretary of the State according to Regulations 62 (5) and 64 (2) of the Habitats Regulations 2010. This can be found in **Appendix L** of this SMP2 and was submitted on the 8th November to Defra (the Secretary of State), alongside a support letter of the SMP2 policies from Natural England. This last stage assessed whether there are any alternative solutions or preventative measures to the policy (PU6C.5) that is resulting in the adverse effect, and to determine that the SMP2 should be permitted for Imperative

Reasons of Overriding Public Interest (IROPI). Compensatory habitat measures must therefore be secured to ensure that the overall coherence of the Natura 2000 network is protected. **Appendix L** records that 31 hectares of coastal grazing marsh (with the function of providing high tide roost sites and feeding areas for winter grazing birds) will need to be replaced like for like. Therefore, this amount of compensatory habitat is required to be passed onto the Environment Agency's Southern Regional Habitat Creation Programme for delivery, which is the Government's recommended vehicle for delivering strategic habitat compensation and is funded in advance of policies that cause damage.

M4.7 *Summary of the SEA ER Addendum (December 2010)*

M4.7.1 Following the changes to the HRA and comments from key stakeholders during the public consultation period (July – October 2010), it was necessary to clearly illustrate the assessment of the SMP2 policies against the SEA objectives, as well as to clearly summarise the findings using significance criteria score. This was done by publishing an 'Addendum' to the SEA Environmental Report (**Appendix M**), which was issued, for public consultation, from the 7th to 30th December 2010.

M5 INFLUENCE OF THE ENVIRONMENTAL REPORT AND CONSULTATION

- M5.1.1** The Isle of Wight SMP2 was progressed in advance of the SEA; however, the consideration of environmental factors has played a crucial role in the development of the SMP2, as documented in *Appendix G of the SMP – Scenario Testing* (i.e. Policy Appraisal). The consideration of environmental factors in the development of the SMP was based on adherence to SMP guidance, which has previously been considered sufficient to attend the requirements of the SEA Regulations. The environmental elements of the SMP process (such as the Theme Review and Scenario Testing) had full regard to how the policy may affect the environment. This process informed the development of the SMP. Although the SEA Environmental Report followed this process, it confirms that the intentions of the SMP were achieved.
- M5.1.2** The SEA Environmental Report confirmed that the Isle of Wight SMP2 provides a wide range of positive environmental benefits, through the maintenance of key coastal settlements, tourism assets and infrastructure, defence of designated heritage assets, management of coastal habitat and protection of the outstanding coastal landscape. The consideration of environmental issues can therefore be shown to have influenced SMP2 policy development and the SMP2 Action Plan.
- M5.1.3** The SMP2 Action Plan (*Chapter 6* of the main SMP2 document) summarises all the specific actions that are needed to implement the plan and the policies. This includes actions by the Environment Agency and local authorities to develop flood and erosion risk management strategies and schemes. It also includes actions for the other partner authorities, for example to incorporate the plan into the land use planning system or support adaptation of affected people, businesses and organisations. The key actions have been identified through the influence of the Environmental Report and Habitat Regulation Assessment Report in **Table 5.1** below.

Table 5.1 Influence of the SEA Environmental Report

Agreed Mitigation Activity	Responsibility for Implementation
Water Quality and Resources	
Ensure that any subsequent strategies, schemes and projects consider the mitigation measures listed in the Environment Agency's South East River Basin Management Plan Programme of Measures (refer to Tables 4 and 5 of Appendix J).	Further assessment of effects in RBMP and as part of SEA at strategy, and EIA at scheme level.
Biodiversity, habitats and species	
Support the Environment Agency's Regional Habitat Creation Programme (RHCP) by providing information from the SMP2 and engaging with third parties on the island	HRA as part of SEA at strategy, and EIA at scheme level.
Need to secure compensatory habitat for 31 hectares of coastal grazing marsh (with the function of providing high tide roost sites and feeding areas for winter grazing birds) for the Solent and Southampton Water SPA and Ramsar sites through the Southern RHCP.	
Continue monitoring of saltmarsh and mudflat areas along the Medina Estuary. This needs to inform understanding of the intertidal areas' flood defence function, the sustainability of the earth embankments, and its habitat function. To be integrated with RHCP.	
Research opportunities / implications for habitat creation within Dodnor Creek	

Agreed Mitigation Activity	Responsibility for Implementation
adjoining the Medina Estuary.	
Further studies to investigate MR at the Old Mill Pond: i.e. the viability of the policy; future morphology of the pond; the feasibility of regulated tidal exchange and intertidal habitat creation; exact saline consequences on Briddlesford Cope SAC of undertaking managed realignment; define the standard and prepare a management plan for maintaining the sluices.	
When new defences or maintenance works are required at Nettlestone Point ensure that these are created out of rocky material to provide colonisation opportunities for rocky shore communities with sea level rise.	
Develop plan for short and medium term policies leading to MR at Thorley Brook to allow time for habitat adaptation and to assess/address consequences of tidal inundation for the properties and infrastructure at the margins of the floodplain. (A specific programme of action for monitoring, consultation and studies to improve predictions of intertidal developments and understanding of the impact of loss and gain of intertidal foreshore on flood defence and habitats. The increased knowledge will inform the timing, location and extent of the saline intrusion into the lower reaches of Thorley Brook and Barnfields Stream for the MR in the second epoch and thus optimize defence sustainability and to compensate for the expected loss of freshwater habitats).	
Historic Environment	
A review of all HER data to ensure that it has correctly captured the important issues for consideration during scheme development. Additional information for the Strategies will be assessed, especially for Managed Realignment schemes and areas that will have No Active Intervention.	Further assessment of effects on historic environment as part of SEA at strategy, and EIA at scheme level.
Adapt footpaths around Newtown Estuary (e.g. the footpath landward of the saline lagoons in Newtown Estuary).	

- M5.1.4** All public consultation responses associated with the Environmental Report, HRA Stage 3 Report and WFDA Report have been addressed and are provided in **Section M6** and **Annex M** of this SoEP.
- M5.1.5** Mitigation and monitoring required based on the conclusions of the Environmental Report and policy appraisal is discussed in **Section M7** of this report. It should be noted that further assessment of environmental effects and HRA will be carried out at strategy and scheme level, and the monitoring and mitigation requirements will be reviewed as part of the development of Shoreline Management Plan 3 (SMP3).

M6 SUMMARY OF THE KEY CONSULTATION RESPONSES AND ACTIONS

M6.1 SEA Scoping Report Consultation Responses

M6.1.1 The Scoping Report underwent a five week consultation period with Isle of Wight SMP2 Client Steering Group (CSG) between the 1st March and the 5th April 2010. A summary of the key consultation responses at this stage are set out below, with more details in **Annex M-I** of this SoEP and how these have influenced the SEA assessment and SMP.

Table 6.1 Summary of the key stakeholder comments on the SEA Scoping Report

Stakeholder	Comments	Response
Natural England	Need to focus/identify better the receptors/issues/impacts regarding coastal squeeze, increased erosion and impact on designated habitats - international, national, local?, AONB, as well as species (flora and fauna), habitats, geology and people.	This was dealt with in the final version of the Scoping Report.
Isle of Wight (IoW) County Archaeology and Historic Environment Service	National guidance with regard to the historic environment should include 'Coastal Defence and the Historic Environment: English Heritage Guidance (2003), and 'Shoreline Management Plan Review' and the Historic Environment: English Heritage Guidance' (2006). The main local strategic document dealing with the historic environment is the Isle of Wight Historic Environment Action Plan.	This was referred for the SEA assessment of the SMP2 policies.
	Recommended that the baseline include a paragraph on non-designated heritage assets, including the HEAP, the Isle of Wight Historic Environment Record (HER), the List of Buildings, Structures, Parks and Gardens of Local Importance, and Historic Landscape Characterisation (HLC).	The Scoping Report was amended and was also used within the SEA assessment.
IoW Area of Outstanding Natural Beauty Partnership	Make reference to the Solent Brent Goose and Waders Spatial Analysis that Hampshire and Isle of Wight Wildlife Trust (HIOWT) have undertaken – this information will strengthen the evidence base for the SEA. Also refer to the Solent Disturbance and Mitigation Project.	These were referred to during the SEA Assessment.
RSPB	Advised of the replacement of The Conservation (Natural Habitats &c) Regulations 1994 (as amended) by The Conservation of Habitats and Species Regulations 2010.	These were changed when they came into force on 1 st April 2010.

M6.1.2 The consultation period and the provision of feedback by the statutory consultees on the draft Scoping Report enabled the report to be amended and finalised so that it incorporated the comments and ensured that the SEA ER would address their concerns; this was re-issued to the CSG on the 27th April 2010. The environmental assessment of preferred SMP policy was undertaken using the SEA assessment criteria, indicators and targets agreed through the Scoping Report consultation period.

M6.2 SEA ER Consultation Responses

M6.2.1 The draft SEA ER was then issued to the CSG for review at the end of May, with a summary of the comments provided in **Table 6.2**, and more detailed comments given in **Annex M-II**.

Table 6.2 Summary of the key stakeholder comments on the draft SEA ER

Stakeholder	Comments	Response
Environment Agency	Biggest issues might be the lack of ownership of mitigation measures following identification of adverse for example where coastal squeeze is assessed, need to commit to compensatory habitat through RHCP.	This comment was addressed, for example by explaining the approach to securing compensatory habitat.
	The policy options definitions are in contrast to the definitions used in the main document (section 1 page 6).	These were the Defra definitions, which have now been used in SMP document.
	No mention of cumulative impacts by habitat - should get overall picture of habitat loss /gain (i.e. summarise HRA), then refer to mitigation /compensatory habitat (e.g. through regional habitat creation programme) – Amended.	Summary of the findings of the HRA have been inserted.
IoW County Archaeology and Historic Environment Service	'Erosion of Priory Woods SSSI would maintain the geological features (Pleistocene gravels) and thus the SSSI in favourable condition' - but at the same time, we don't know the extent of the gravels, particularly the deposits containing Palaeolithic artefacts, some of which are in mint condition suggesting an in situ flint-working site, potentially of national or international importance. This site may be lost to coastal erosion.	Added comment into negative effect.
	Specific information was provided on a number of designated sites that were missed from the assessment due to the information being missing from the GIS database provided for the assessment.	This information was incorporated into the SEA assessment.
	Recommend stating that SMP policy could lead to the loss of designated heritage assets' because there are many sites which are equally important which are undesignated.	Amended.

M6.2.2 The key stakeholder comments from the draft SEA ER were incorporated and the final version of the SEA ER underwent a three month public consultation period (23rd July 2010 to 23rd October 2010), as part of the public consultation for the Draft SMP2 for the Isle of Wight. **Annex M-III** summarises the key consultation responses and sets out how these have influenced the SEA assessment and SMP2. The overall SMP's consultation and stakeholder engagement is described in the SMP in Appendix B of the SMP2 – Stakeholder Engagement. The majority of consultation responses related to specific issues with Policy Units, support for the SMP, environmental issues and defences. All comments received were thoroughly reviewed and considered, and answers or links to further information provided where possible.

M6.2.3 Following consideration of comments, in no instances was a case identified to justify a change in any of the SMP2 policies. **Table 6.3** below indicates where consultation responses led to alterations and additions to sections of the SMP.

M6.2.4 QRG also provided comments, which centred on providing more clarification on a number of points for the SEA ER and HRA, which resulted in the publication of an addendum to the SEA ER that was then submitted for public consultation from 7th to 31st December; these comments are provided in **Annex M-IV**.

Table 6.3 Summary of the stakeholder comments on the public consultation published SEA ER

Stakeholder	Comments	Response
English Heritage / IoW Historic Environment Service	Provided important information on Osbourne House, Yarmouth Castle, Quarr Abbey, as well as detailing the required mitigation measures for the damage and loss of designated heritage assets that the SMP2 would need to add to the Action Plan	This information was used to clarify the significance of effects of the SMP2 policy on a few of the assets (as presented in the Addendum to the SEA ER (Appendix M)), as well as to state the necessary mitigation measures.
RSPB / Hampshire and Isle of Wight Wildlife Trust	Concerned with the preferred policies at a number of important sites for nature conservation, including 'Brading Marshes, St Helen's Duver and Niton Undercliff. Furthermore, they questioned whether the SMP2 environmental assessments met statutory obligations, and wanted further clarification on some of the conclusions reached in the HRA on the effect on some of the designated sites (e.g. in the Medina Estuary, Wootton Creek, Western Yar Estuary, Bembridge Harbour).	The main problem was lack of justification in the SMP2 document for some of the policies, as well as within the SEA assessment and HRA, and thus has since been clarified in the SMP2 report and HRA, and further in the Addendum to the SEA ER (Appendix M), so as to clarify what the main issues are collectively in an Island context.
Natural England	Provided advice and a steer on some of the points that the RSPB and Hampshire and Isle of Wight Wildlife Trust were disputing. Further stated that PU6C.5 would indeed have an adverse effect on the Solent and Southampton Water SPA, not just the Ramsar site as had previously been agreed. That the loss of the saline lagoons in PDZ 7 (Newtown Harbour) will be from natural loss and not the SMP2 as the estuary is currently undefended, and that the saline lagoons are presently in the location of historic salt pans, and will in time roll back with rising sea levels.	
Fishbourne Parish Council; Landowners; Wootton Bridge Parish Council; Woodside Residents Association; East Bank Residents, Quarr Abbey	Comments / concerns with regards to the policy suite at Wootton Creek, in particular the No Active Intervention fronting residential gardens.	Clarified why the policy suite was chosen and amended wording in the plan so it was clearer to understand, in particular the case of HTL where there is economic justification to do so, which is not the case in many part of Wootton Creek.
Bembridge Harbour Trust; Chairman of Bembridge and St Helens Harbour Association; St Helens and Bembridge Coastal Harbour Working Group (EYS)	Concerns over allowing the groyne at Bembridge Point to reach the end of its life and not replace it / accretion within Bembridge Harbour / policy along the frontage of the Bembridge Coast Hotel.	The Eastern Yar Strategy found that the groyne does not serve a coastal erosion purpose. The wording in the SMP2 has been clarified so the reason for allowing this defence to fail is clear. Response also gave information that a dredging protocol for the harbour is currently being finalised, as is the Beach Management Plan for Coast Hotel.

Stakeholder	Comments	Response
Residents	Correction to map heading required (Section 1.5.1 of main SMP document). Concerns of the landslide issues along the Ventnor frontage.	Amendment made – map heading changed from ‘northeast coast’ to ‘southwest coast’. Concerns have been passed onto the future work for the Strategy Study for Sandown and the Undercliff.
Yarmouth Town Council Yarmouth Coastal Defence Working Group (consisting of representatives of Yarmouth Town Council, Yarmouth Harbour Commissioners, Freshwater Parish Council, IW Estuaries Project, an Environmentalist / liaison with Shalfleet Parish Council, Isle of Wight Council and liaison with Totland Parish Council) Chairman of Commissioners Yarmouth Harbour Commissioners Vice Chairman of the Yarmouth Harbour Commissioners (& resident) Secretary of the Royal Solent Yacht Club, Yarmouth IOW Yarmouth Sailing Club Resident & Business Solent Protection Society	<p>Would like Yarmouth's Built Heritage and the importance of Yarmouth Harbour to be included in the SMP Objectives asked for a start and finish date for resuming work on the West Wight Coastal Defence Strategy Study.</p> <p>Wanted clarification on the area of south part of Station Road, the old railway station, and The Mount in Yarmouth. Also the importance of the old railway line as a link between Yarmouth & Freshwater should be considered.</p> <p>HTL at Norton Spit may be difficult to achieve unless the harbour breakwater is extended. A second and western harbour entrance could be considered, or the A3054 between the Yar Bridge and Halletts Shute is built on an embankment to protect the estuary and town.</p> <p>Norton Spit is a natural feature and a designated nature reserve. As sea level rises it will become illogical to defend it. It would be more sensible to retreat from about 2055 onwards and to defend the line at the road between Yarmouth Bridge and Halletts Shute. This road and Yarmouth Bridge itself will need to be raised to prevent flooding.</p>	<p>Yarmouth's Built Heritage and the importance of Yarmouth Harbour will be included in the Objectives. The CSG confirmed that the West Wight Strategy is a priority and will be the first Strategy to commence following the completion of the SMP subject to government funding. The target start date is currently 2011 and would be finished approximately two years from start.</p> <p>The recommendation was clarified in the Management Area Statement for area 6C to make this intention clear, with the SMP recognising that the old railway line link is valued and important to the area, and recommends that the link is maintained and adapted where necessary, for example through a bridge or materials which allow for occasional inundation.</p> <p>The SMP proposes that HTL is the preferred policy and would like to see the coast held at the current defence line along the spit where structures are already in place, but the intention behind the policy is to protect the road and infrastructure, allow a functional harbour and shelter for the town. The detail of how this can be delivered will be addressed in the upcoming West Wight Coastal Defence Strategy. The SMP Management Area Statement was strengthened to provide greater clarity on the intention behind the policy for Norton Spit and the Breakwater.</p>
	Concerned that there is no start and completion dates for resuming the West Wight Coastal Defence Strategy Study.	The West Wight Strategy will be the first Strategy to commence following the completion of the SMP subject to government funding. The target start date is currently 2011, as listed in the SMP Action Plan (Chapter 6) and is

Stakeholder	Comments	Response
		estimated to finish approximately two years from start.
	Disagree with the policy at Thorley Brook and Barnfields Stream because the south and east parts of Yarmouth town appear to have been neglected and further north at The Mount. We agree that a bridge could carry the road to Newport and so allowing a tidal link between the Solent and Thorley Brook. Perhaps it should be divided into two smaller Policy Units?	The intention would be to take localised action to address the flood risk where required. The text and policy table of the Management Area Statement for area 6C was supplemented to make this intention clear. If the Strategy is extended to include the Medina Estuary, we can confirm that will not affect the importance and attention required to address future flood and erosion risk in the Yarmouth area.
	Concerned that NAI along the eastern bank (6C.4) of the Western Yar estuary disregards the importance of the old railway line which is a much used link between Yarmouth and Freshwater to both residents and tourists. We would prefer to see MR in order to maintain this important link.	The old railway pathway/cycletrack between Yarmouth & Freshwater has been considered, and while it is an important tourism feature and transport mechanism, it would not alone be a strong enough driver to alter/prevent the natural functionality of the estuary or justify a MR or HTL policy. The SMP recognises that the link is valued and recommends that the link is maintained and adapted where necessary. This recommendation is clarified in the Management Area Statement for 6C.
	Understand the proposal to HTL at the Causeway but are concerned that the proposal is not viable. Believe that the prime defence for the Western Yar estuary to the south should be the sea wall at Freshwater (which needs reinforcing and raising).	The CSG feel that HTL is achievable to prevent tidal flood risk to Freshwater. The delivery of how this is undertaken will be further investigated in the West Wight Strategy and scheme design. The CSG recognises the importance of the seawall at Freshwater and propose a HTL policy at this location as well.
	In the area of Thorley Brook to the south and south east of Yarmouth we believe that insufficient consideration has been given to HTL in the first epoch and protecting property, business and residential, in the other epochs. This area must be HTL throughout the SMP2 otherwise there will be ingress of water into Yarmouth from the south. There appears to be little consideration in SMP2 to protect businesses and residential property that abutt Thorley Brook and Drafhaven etc.	This concern is recognised and addressed in the SMP. The intention would be to take localised action to address the flood risk where required. The text and policy table of the Management Area Statement for area 6C was supplemented to make this intention clear. These suggestions will be forwarded to the team undertaking the West Wight Strategy to help inform the development.
	Agree that the breakwater at Yarmouth Harbour is critical to the defence to	Comments were noted with regards to the preferred policy for how HTL could

Stakeholder	Comments	Response
	<p>Yarmouth Harbour, Yarmouth town and the Western Yar estuary. The steelwork of the breakwater has only about fifteen years life remaining (i.e. to 2025). It makes sense that any replacement breakwater can cope with the predicted sea level rise until at least 2100. Any new breakwater will require more substantial foundations and will have to be at least one metre higher. Consideration should be given to moving it further north (i.e. "ATL" rather than "HTL"). There needs to be an understanding that the breakwater will require to be replaced at an early stage, any strategy and funding plan will need to take this into account. The breakwater is further complicated as it is part of an SSSI. We therefore disagree with SMP2's short term view on the breakwater, as we consider it needs much greater emphasis.</p>	<p>be delivered and will pass this to the West Wight Strategy to help inform the development. However, it is important to note that ATL would not be appropriate policy in this area as this would reflect an intention to physically move the line forward, usually done through land reclamation, whereas the issue in this area is the actual location of the breakwater defence line.</p>
	<p>Concerned about the impact to the Royal Solent Yacht Clubhouse and adjacent property if the predictions for sea level rise through the 21st Century are correct. We are also concerned about the possible cost of protecting against flood.</p>	<p>The SMP supports maintaining the road links to Yarmouth and the West Wight, and the HTL policy is an essential element of achieving this. There will be challenges to achieving Hold the Line for Yarmouth due to the mixture of public and private defences. The detail of how this should be achieved, including the type of defences, will be developed and discussed with the community as part of the West Wight Strategy.</p>
	<p>Totland and Colwell - agree that the sea defences should be maintained as a large number of locals and holiday makers use the sea wall between Totland and Colwell. In order to maintain this sea wall, I think that appropriate authorities should look at replenishing the materials at the base of the wall to stop the sea under-mining the foundations of the wall at Colwell.</p>	<p>Comment and suggestion passed on to the upcoming West Wight Strategy Study.</p>

M6.2.5 The SEA did not identify any significant environmental effects that required transboundary consultation on this plan. Due to this, no consultation responses were received via this consultation route.

M6.3 SEA ER Addendum Consultation Responses

M6.3.1 The SEA ER Addendum was issued for public consultation (7th – 31st December 2010), from which two responses were received and summarised in **Table 6.4** below.

Table 6.4 Summary of the stakeholder comments on the SEA ER Addendum

Consultee	Summary of Comments	Action taken to Finalise Plan
Rosemary Cantwell and Chris Attrill	Concerns about the policy of MR in the third epoch in PU3A.2 (St Helen's Duver), how this will be implemented and how it will affect Bembridge Harbour and its surroundings.	More specific details of how the MR will occur will be carried out as part of future Strategy Studies, which will also detail the economic and environmental effects from the specific plan. No changes to the plan as a result of comments.

M7 ENVIRONMENTAL MONITORING MEASURES FOR THE IMPLEMENTATION OF THIS SMP2

M7.1 Introduction

M7.1.1 The aim of the Isle of Wight SMP2 is to provide a consistent approach to flood and coastal erosion risk management over the whole shoreline/frontage of Island. This consistency has to take account of the physical aspects of coastal management, ensuring that decisions in one area take account of the effect they have in other areas in terms of processes and geomorphology. Ultimately, however, this has to take account of the effect on the interrelationships between the socio-economic and ecological values identified for different areas of the coast as a whole; these being the real drivers behind any intent of management. Thus, monitoring will play an integral part in the successful implementation of the SMP2 and ensuring the key values of Isle of Wight are well managed and safeguarded for future generations.

M7.2 Effects on the Integrity of International Sites

M7.2.1 For the Isle of Wight SMP, there is only one Policy Development Zone (PDZ) where the proposed policies resulting from one policy unit will cause an adverse effect on the integrity of *Natura 2000* sites. This is in PDZ 6 (West Wight), the preferred policy for Policy Unit 6C.5 (Yarmouth Mill and Thorley) is to HTL in the short term (Epoch 1), followed by MR in the medium term (Epoch 2), and NAI in the long term (Epoch 3). The loss of habitats from this policy suite results from the MR policy in Epoch 2:

- **Solent and Southampton Water Special Protection Area:** 31 hectares of coastal grazing marsh supporting high water roosting and feeding of wintering migratory birds (dark-bellied Brent geese, teal and black-tailed godwit); and
- **Solent and Southampton Water Ramsar:** 31 hectares³ of permanent freshwater/brackish marshes (Criterion 1) supporting wintering wildfowl assemblages (Criterion 5) and wintering dark bellied Brent geese, teal and black-tailed godwit (Criterion 6).

M7.3 Effects on the Condition of SSSIs

M7.3.1 The SMP has the potential to affect the condition of SSSIs through changes in habitat and coastal management (due to the number of SSSIs on the coast), with knock-on effects on the high level targets relating to SSSIs in favourable condition. The key SSSI habitats to be affected by the SMP2 for Isle of Wight include:

- Briddlesford Copse SSSI – woodland habitat;
- Yar Estuary SSSI – coastal grazing marsh;
- Ryde Sands and Wootton Creek SSSI – sandflats and rocky intertidal;
- Priory Woods SSSI – geological;
- Brading Marshes to St Helen's Ledges SSSI – saltmarsh and mudflats;
- Compton Chine to Steephill Cove SSSI – geological; and
- Colwell Bay SSSI – geological.

³ The loss of coastal grazing marsh is from one area that is designated as both SPA and Ramsar.

M7.4 ***Effects on UKBAP Habitat***

M7.4.1 The SMP2 has also the potential to affect the condition of BAP habitats through changes in habitat and coastal management. The key BAP habitats to be affected by the SMP2 for Isle of Wight include mudflats, coastal grazing marsh, saltmarsh, reedbeds, and woodland.

M7.5 ***Effects on Coastal Cultural and Archaeological Sites***

M7.5.1 The HTL policies implemented by the SMP2 will maintain the protection from erosion for numerous designated heritage assets and maintain the current level of flood protection. However, potential examples were found where SMP2 policy (notably NAI) would lead to the loss or damage of designated sites/features that are important to the historic environment such as Scheduled Monuments, Listed Buildings and Registered Parks and Gardens. Therefore, sufficient time should be provided, if required, for appropriate mitigation of loss or damage to such historic assets if preservation in situ cannot be achieved.

M7.6 ***Environmental Monitoring Measures during Plan Implementation***

M7.6.1 The SMP2 Action Plan provides a specific programme of monitoring and evaluation to determine in detail the response of the system to SMP2 policy and to sea level rise. Actions are to be provided for each PDZ and epoch. Monitoring for the SMP2 will therefore, primarily include:

- Continuation of the Strategic Regional Shoreline Monitoring Programme based on policies and additional requirements identified to improve understanding for SMP3, which will also monitor the response of shoreline to establish whether the system will either accrete or erode in response to sea level rise;
- Monitoring and review of emergency response plans to prepare for extreme events that exceed standard;
- Continue with improvements to flood risk maps and inundation modelling to provide an improved flood warning service;
- Comprehensive monitoring programme for cliff top erosion;
- Intertidal habitat mapping programme in certain locations;
- Develop a plan for short and medium term policies leading to MR at Thorley Brook to allow time for habitat adaptation and to assess/address consequences of tidal inundation for the properties and infrastructure at the margins of the floodplain;
- Monitoring, consultation and studies to improve predictions of intertidal developments and understanding of the impact of loss and gain of intertidal mudflat and saltmarsh on flood defence and habitats, and loss of coastal grazing marsh. The increased knowledge will inform the timing, location and extent of the saline intrusion up the lower reaches of Thorley Brook and Barnfields Stream for the MR in the second epoch and thus optimize defence sustainability and to compensate for the expected loss of freshwater habitats, high water feeding functionality for the SPA and Ramsar bird feature and wetland Ramsar habitat. Furthermore, such a programme will also need to investigate the feasibility of either maintaining some of the functionality by keeping some of the coastal grazing marsh in situ or creating further coastal grazing marsh along the upstream areas of the saltmarsh; and

- Loss of habitat function, as a consequence of the recommended SMP2 policy within the Western Yar Estuary (PU 6C.5) used by migratory bird species and waterfowl assemblages as feeding and high tide roost sites, can potentially be mitigated through habitat management; for example, artificial roost sites can be substituted by use of pontoons, keeping some habitat in situ or creating habitat further upstream.
- The continued monitoring of SSSI habitat units, which enables an early determination of where favourable condition may be threatened by inappropriate coastal management (SMP policy). It is considered that the existing monitoring programme undertaken by Natural England would be sufficient for this purpose, but there is a need to feed any initial findings into the SMP2 Action Plan and the development of subsequent SMP3 policy at the earliest stage.
- There is a need to ensure that existing monitoring of UKBAP habitat in the plan area is provided in a manner that will highlight shifts in UKBAP habitat extent and informs the UKBAP recording process.
- The actions provided in the SMP2 Action Plan associated with monitoring of saltmarsh and mudflat areas, and woodland around the Mill Pond at Wootton Creek for example, coupled with Natural England and the Environment Agency's monitoring programmes will ensure that effects on UKBAP habitat are considered and inform the development of future SMP2 policy.
- A comprehensive monitoring programme for cliff top erosion that would include cliff or shoreline sections, in which heritage assets are present, so as to assess where mitigation measures may be required in future, and whether additional historic environment survey and/or desk-based assessment will be needed in some locations. Where heritage assets are threatened with unavoidable loss as a result of coastal erosion, the mitigation is to relocate them further inland. In general, the preferred mitigation option will be recording assets prior to their loss.
- It must be accepted that other 'unknown' historic sites could be at risk, but would only come to light as the SMP2 is implemented and the coastline erodes. English Heritage will be instrumental in helping to establish what the specific nature of losses may be and where losses are known, a figure for investigation established so that this funding can be sought from Government. This element of work would tie in with the monitoring and survey recommendations for the historic environment (e.g. the Isle of Wight Coastal Audit through the upgrading/updating of the Rapid Coastal Zone Assessment Survey (RCZSA) and provide a framework for flexible and rapid response to the discovery of sites or features of importance that become exposed as a result of coastal erosion.

M7.6.2 The SMP2 Action Plan provides for these actions. More detailed assessments will also be carried out at both the Coastal Strategy and scheme level. These will include HRA and other assessments to determine and mitigate environmental effects, which will be informed by the knowledge and information developed through the monitoring programme.

M7.6.3 The environmental monitoring requirements of the SEA Environmental Report are in part provided for by the SMP2 Action Plan.

M8 REFERENCES

Defra (2006a). *Shoreline Management Plan Guidance Volume 1: Aims and Requirements.* Department of Environment, Food and Rural Affairs.

Defra (2006b). *Shoreline Management Plan Guidance Volume 2: Procedures.* Department of Environment, Food and Rural Affairs.

SEA Directive 2001/42/EC Environmental Assessment of Plans and Programmes Regulations (SI 1633) 2004.

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ANNEX M: SUMMARY OF THE CONSULTATION RESPONSES / ACTIONS FOR THE SEA ENVIRONMENTAL REPORT

Annex M.I A Summary of the Key Consultation Responses and Actions for the Scoping Report

Annex M.II A Summary of the CSG Comments on the draft SEA ER

Annex M.III General Public Consultation Comments and CSG Responses to these Comments

Annex M.IV Quality Review Group Consultation Comments and SMP2 Team Responses to these Comments

Response	Action/Comment
Natural England – 19th March 2010	
A useful document to refer to is: PPS 25 Supplement: development and coastal change. http://www.communities.gov.uk/publications/planningandbuilding/coastalchange .	Noted and referred to.
The report could already scope out issues/areas that will not be impacted on by the SMP, for example there are some SSSI sites that are very terrestrial which could be scoped out and not considered. This would help shorten the length of the scoping report and focus the assessment and subsequent output on what is relevant	This was carried out for the final version of the Scoping Report, which aided a more concise SEA ER.
Do need to focus/identify better the receptors/issues/impacts regarding coastal squeeze, increased erosion and impact on designated habitats - international, national, local?, AONB, as well as species (flora and fauna), habitats, geology and people.	This was carried out for the final version of the Scoping Report, which aided a more concise SEA ER.
Environment Agency – 25th March 2010	
Inappropriate level of detail for SMP SEA (too detailed), yet not comprehensive coverage of issues /receptors, or of SEA methodology. Detailed response on how to improve the Scoping Report and thus the ER in Annex I.	These responses / concerns have subsequently been addressed in detail in Annex I of this SoEP.
Biodiversity - OK but could argue that the sole focus at SMP level should be to consider international designations, and possible national. I.e. - tier consideration of local designations to strategy, scheme level assessment and save space.	This was addressed and ensured that international and national designations were considered and local designations were noted but not used in the assessment, as they will be considered the later strategies and individual projects.
Isle of Wight County Archaeology and Historic Environment Service – 23rd March 2010	
National guidance with regard to the historic environment should include 'Coastal Defence and the Historic Environment: English Heritage Guidance (2003), and 'Shoreline Management Plan Review' and the Historic Environment: English Heritage Guidance' (2006). The main local strategic document dealing with the historic environment is the Isle of Wight Historic Environment Action Plan.	These documents were noted and subsequently used in the SEA ER.
Recommended that the baseline include a paragraph on non-designated heritage assets, including the HEAP, the Isle of Wight Historic Environment Record (HER), the List of Buildings, Structures, Parks and Gardens of Local Importance, and Historic Landscape Characterisation (HLC).	The Scoping Report was amended and was also used within the SEA assessment.
The Isle of Wight's coastal historic environment comprises a wide range of sites, structures and landscapes. There are 120 Scheduled Monuments in the Isle of Wight, and no ancient monuments, also 1951 Listed Buildings, 28 of which are designated Grade I – the most current information can be obtained from the IW Council Conservation Team. For details of those listed refer to Annex I for the full list.	Information on the range of sites was taken on board and IW Council Conservation Team contacted.
<p>HEAP key relevant issues:</p> <ul style="list-style-type: none"> • Erosion of coastal cliffs, leading to loss of historic landscape features and archaeological material; • Need for resources to ensure the effective archaeological monitoring of eroding cliffs on a regular basis with due regard to health and safety. • Need to maintain coastal archaeological monitoring, including further research into the relationship between archaeological features and earth movements in the Undercliff. • Ground instability and coastal erosion, whilst it has exposed many archaeological sites, also causes the continuing loss of these sites, often unrecorded. • Sea level rise associated with climate change will affect coast and reclaimed grazing marshes, increased coastal erosion and flooding may affect semi-natural habitats such as Headon Warren and more rapid erosion of coastal chalk cliffs. • Actions taken in response to rising sea levels may have an impact on historic environment, e.g. earthmoving and excavation could damage palaeo-environmental deposits in valley floor peats. 	These relevant issues were recorded and used within the SEA assessment.

Response	Action/Comment
Isle of Wight Area of Outstanding Natural Beauty Partnership – 29th March 2010	
We are pleased to note the detailed acknowledgement and reference made to Isle of Wight protected Landscapes and the Isle of Wight AONB Management Plan. Heritage Coast should be referenced as a 'Definition' not a 'Designation'. Good general coverage of risks identified and there are no obvious issues not listed.	Noted the advice.
RSPB – 1st April 2010	
On the whole, the Scoping Report appears to be a comprehensive account of the relevant information and issues to inform the SEA. Would recommend make reference to the Solent Brent Goose and Waders Spatial Analysis that Hampshire and Isle of Wight Wildlife Trust (HIOWT) have undertaken – this information will strengthen the evidence base for the SEA. Also refer to the Solent Disturbance and Mitigation Project.	These reports were used within the assessment for the SEA and the HRA.
Advised of the replacement of The Conservation (Natural Habitats &c) Regulations 1994 (as amended) by The Conservation of Habitats and Species Regulations 2010.	This was noted and any references amended within the Scoping Report and SEA ER.

Response	Action/Comment
Environment Agency	
Good report, reads easily, well structured, bit weak on environmental trends emerging from baseline, issue of different SEA objectives to SMP objectives gives rise to potential compatibility problem - need to mention briefly. Biggest issues might be the lack of ownership of mitigation measures following identification of adverse impacts - this has been an issue for QRP for other SMP SEAs. Also need to summarise separate assessments with respect to biodiversity (i.e. HRA) and water (WFD assessment), not just refer to.	Taken note and amended in the text.
Where there are adverse impacts on international sites, there is a legal obligation to find compensatory habitat (after no alternatives, IROPI etc).	Amended text to take account of this
The policy options definitions are in contrast to the definitions used in the main document (section 1 page 6).	These were the Defra definitions, which have now been used in SMP document
Climatic factors - agree that climate change mitigation cannot be considered at SMP level, but could mention that climate change adaptation has been considered in the SMP through Defra's recommended allowances for sea level rise etc.	Added into the final version of the SEA ER.
If plan appraisal objectives are different to SEA objectives, strictly you should assess the compatibility between the objectives. May be worth brief mention that the objectives vary only because of different SMP /SEA terminology and are compatible.	Changed text to incorporate comment.
Not enough ownership of mitigation - for example where coastal squeeze is assessed, need to commit to compensatory habitat through RHCP. Previous QRP comment on SMP SEAs has indicated that mitigation measures need to be owned by the SEA, not simply tiered to lower level assessment. This SEA needs to own mitigation better – e.g. through mention of compensatory habitat via RHCP.	Changed text and provided more commitment.
No mention of cumulative impacts by habitat - should get overall picture of habitat loss /gain (i.e. summarise HRA), then refer to mitigation /compensatory habitat (e.g. through regional habitat creation programme).	Amended – summary of the findings of the HRA have been inserted
Need to summarise results of WFD assessment not just refer.	Amended – summary of the findings of the WFD Assessment have been inserted.
The post adoption statement is a brief advert notifying of plan /SEA approval /adoption - details of how environmental considerations were incorporated into the final SMP will be in a separate (brief) report - the Statement of Environmental Particulars.	Added in.
Isle of Wight County Archaeology and Historic Environment Service	
I would like to see the term 'features' replaced with 'designated heritage assets, because there are many significant sites that are undesignated so therefore scoped out of this report; e.g., rather than 'No Change to heritage features' I would prefer 'No change to designated heritage assets'; 'No noted features' - 'No designated heritage assets'; 'Features protected' - 'Designated heritage assets protected'; 'No impacts on features expected' - 'No impact on designated heritage assets expected'; 'No loss of important features/' 'No loss of features'- No loss of designated heritage assets'; 'No effect on features' - 'No effect on designated heritage assets'.	Terms changed as recommended.
The majority of the comments were for grammatical errors, changes in historic environment terminology and corrections to heritage assets within the report.	
Although the adverse impacts on statutory heritage assets may be moderate, the impact on non-designated assets is likely to be more severe, with many sites being destroyed or damaged.	Taken note of point
Quarr Abbey SM not at risk within next 100 years - this is in contradiction to Appendix G p.48 Up to 2105 - 'North of SM site will be affected by flooding.	Changed in accordance with Appendix D and G. Missing some data in previous assessment.
Additions needed, for example (refer to Appendix F-II of the SEA ER for further details): <ul style="list-style-type: none"> o Negative Effects: Partial loss of Osborne (Grade II* Registered Park & Garden) and loss of associated Listed Buildings on coast o Negative Effects: Impact on Yaverland Fort (Scheduled Monument) o Doesn't mention the Neolithic Mortuary Enclosure on Tennyson Down (SM), which is included in the sites under threat on p.49 o The Osborne House Historic Park/Garden is also threatened. 	Been added into Table 8.1, Annex FIII - FV as was not on the GIS layers.

Response	Action/Comment
<ul style="list-style-type: none"> ○ The sea wall along Cowes Parade is also a Grade II Listed Building which potentially would be impacted by all options ○ There is some contradiction here - The Royal Yacht Squadron /West Cowes Castle are the same building, therefore, if 'there is potential for the Royal Yacht Squadron to be adversely affected', it is not correct that 'Historic buildings would be maintained'. 	
<p>Positive effects - 'erosion of Priory Woods SSSI would maintain the geological features (Pleistocene gravels) and thus the SSS in favourable condition' - but at the same time, we don't know the extent of the gravels, particularly the deposits containing Palaeolithic artefacts, some of which are in mint condition suggesting an in situ flint-working site, potentially of national or international importance. This site may be lost to coastal erosion.</p>	<p>Added comment into negative effect (though not significant)</p>
<p>I don't think it is particularly necessary to give examples of the Listed Buildings in the summary.</p>	<p>Removed LB examples as suggested.</p>
<p>I would say that the SEA Objective is partially met because there will be impact on Registered Parks & Gardens and Listed Buildings at Norris and Osborne, and also risks to the Quarr Abbey Scheduled Monument.</p>	<p>Changed the assessment summary against the SEA Objective.</p>
<p>I think it's a bit misleading to say that there are many unscheduled sites that will be protected under the recommended plan. Whilst there are certainly undesignated sites, including historic buildings that will be protected within the urban areas, the greater percentage of fragile and vulnerable sites are located in the intertidal zone or on frontages with a No Active Intervention management option.</p>	<p>Added text to make clearer that will be an effect on non designated features.</p>
<p>I would prefer 'SMP policy could lead to the loss of designated heritage assets' because there are many sites which are equally important which are undesignated.</p>	<p>Changed text.</p>

Annex M.III General Public Consultation Comments and CSG Responses to these Comments

Key	
Change/action required to the SMP Document	
No change required to the SMP Document	
To be included within the Action Plan of the SMP	
To be taken forward to the Strategy Study	

Stakeholder	Policy Unit	Comments	CSG Response
English Heritage	All.	<p>Thank you for sending this consultation draft for comment. In this letter I collate comments from English Heritage.</p> <p><i>General comments from English Heritage</i></p> <p>The active involvement of Rebecca Loader, (Isle of Wight County Archaeology and Historic Environment Service) in SMP preparation, in collaboration with your consultants, has ensured that the draft includes a comprehensive review of heritage assets (Appendix D). Potential impacts are further considered in the SEA (Appendix F). Compared to some other SMP2s coverage is thorough, and we thank you for this.</p> <p>However, we note that on p. 57 of the main report the objective “To support the cultural heritage”, contrasts markedly with “To avoid damage to and seek sustainable opportunities to enhance the natural environment.” We consider that this is insufficiently specific and should be replaced with: “To preserve historic environment features in situ where feasible”, with the proviso that “Sufficient time should be provided, if required, for appropriate mitigation of loss or damage to historic assets if preservation in situ cannot be achieved.”</p> <p>New English Heritage guidance on the management of threatened coastal heritage is in preparation at the time of writing, and is summarised in <i>Adapting to Coastal Change: Developing a Policy Framework</i> (Defra March 2010, pp. 41-5). Allow me to explain what is meant by “mitigation” in this context.</p> <p>The new guidance will include the recommend that, where feasible, the resilience of historic buildings vulnerable to repeated flooding should be enhanced. Measures could include localised but permanent flood barriers or demountable barriers and flood boards. Resilience measures for historic buildings could also include relocating services to sit above anticipated flood levels and the replacement of materials and components vulnerable to flooding in a more robust form. One option for heritage assets threatened with unavoidable loss as a result of coastal erosion is to relocate them further inland. This approach should never be ruled out in any initial options appraisal for a threatened heritage asset, although the feasibility and cost of relocation and the implications for the heritage values of the asset would play an important part in decision making. Relocation is likely to be most feasible for smaller and more portable historic structures. It might, in occasional cases, be justified on account of the special, or even iconic, significance of individual structures for a locality or nationally. In general, however, the preferred mitigation option will be the recording assets prior to their loss.</p> <p>In cases where a preferred flood or coastal erosion risk management policy will not protect a heritage asset for the long term, and where is not feasible or appropriate to adequately enhance the resilience of a heritage asset or to relocate it, consideration should be given to recording it prior to its damage or loss. The detail in which assets are recorded should reflect their heritage significance and this should be determined by reference to appropriate research frameworks and by reference to expert professional judgement. Recording should be only be undertaken when the threat to the asset is indisputable (i.e. unlikely to be avoided by a change of FCERM policy) and where clear priorities for recording have been established at the regional and local level. It should, however, normally be undertaken while it is possible to carry out work in a controlled manner (i.e. before an asset begins to actively erode) unless the character of the remains, their significance or their location suggest that they would be more appropriately recorded by periodic inspection during their erosion. In the case of historic buildings, recording may have to take place as part of a programme of demolition intended to prevent the building becoming unsafe and works should be planned accordingly.</p> <p>To assess where mitigation measures may be required in future, additional historic environment survey and/or desk-based assessment will be needed in some locations and this should be incorporated into the SMP Action Plan (see below).</p> <p>Along extensive lengths of the Isle of Wight coastline the SMP2 presents no significant change in policy from SMP1. For developed coasts, especially the principal towns, a Hold the Line option has been preferred, and this will result in preservation of heritage assets at these locations. However, impacts on the setting of heritage assets, if and when defences are improved or raised, may need consideration. Along most undeveloped coasts, including all of Policy Development Zones 5 and 7, a No Active intervention policy is preferred from the present onwards. In most cases this is a continuation of existing policy and so poses no additional threat to heritage assets. However, in the mid to long</p>	<p>Thank you for your comments and this information, and your support of the plan development process. Regarding the wording of the general objective, these were set earlier in the SMP process in consultation with the Steering Group (including EH) and stakeholders, and the policies have been assessed on this basis and therefore cannot be amended at this stage. This comment will be noted for future work. The SMP supports the intention to minimise and record the impact of coastal change on heritage features. Thank you for the clarification of the work required under action 0.6 of the Action Plan. Your suggested wording has been added to this Action Plan item (please see page 371 in Chapter 6) to provide clarification of the intent of the work required. This is also of relevance to Action 0.12 of the Action Plan.</p>

Stakeholder	Policy Unit	Comments	CSG Response
		<p>term numerous assets will be lost to erosion.</p> <p>The main changes from SMP1 relate to estuaries and some harbours. For example, for some areas of the Medina Estuary and Wootton Creek a No Active Intervention policy is preferred, with Managed Realignment at the Old Mill Pond above Wootton Bridge. Reconsideration of the Isle of Wight Coastal Audit is necessary, to determine where further survey in the intertidal and immediately supra-tidal areas of these locations is needed, in order to characterise more fully those heritage assets which will be affected by future coastal change.</p> <p>It is therefore recommended that, as part of the Action Plan for the SMP, a detailed desk-based assessment of heritage assets at risk should be undertaken and that they should be prioritised for mitigation. During the preparation of the Isle of Wight Coastal Audit the entire length of the coast and the main estuaries was surveyed. However, the original survey took place more than ten years ago so some key areas would warrant further field visits. This work is covered by Action Reference 0.6 in the Action Plan.</p> <p>In some cases a Hold the Line option is preferred where built structures are currently defended, moving towards No Active Intervention after 2025 or 2055. Examples include St Helen's Duver and Fort Albert. No action is required at present but, should policy options change during future review, detailed recording of assets prior to their loss is likely to be needed.</p>	
	<p>All (continued from row above). Also PU2A.1 (Osborne) & PU6C.6 (Yarmouth)</p>	<p><i>English Heritage Properties and Guardianship sites.</i> Only two EH estates fall within the SMP area.</p> <p>Osborne House. The Grade 1 Listed House is located within a Registered Park and Garden with a coastal frontage (Policy Unit 2A.1). The shapefile for the estate boundary (from EH heritage data, to be added to corporate GIS) shows an overlap with Environment Agency Floodzone 2 data. The Futurecoast data (for Old Castle Point to Ryde) indicates a mode of foreshore change of -6 (defined as 'indicative of an unhealthy beach trend, where there are reducing levels of protection to the hinterland', with MHW & MLW retreating and intertidal steepening).</p> <p>Currently the SMP2 notes (p. 117) that there is narrowing of the foreshore at this location and re-activations of coastal slopes are in progress behind failures in existing defences. The preferred option to 2025 is No Active Intervention. Sea defences here would fail by 2025, with associated coastal slope undercutting, possible reactivation of shallow landslips and ultimately significant recession of the coast. This would impact the coastal frontage of the woodland and parkland of Osborne House (and of the nearby Norris Castle) and affect access to the shore (SMP2, p. 125). Further discussion will be required on the potential implications for the park and the setting of the house, and consideration must be given development of a monitoring programme at this location, as part of the Action Plan.</p> <p>Yarmouth Castle. This Grade 1 Listed building lies within Policy Unit 6C.6, where the policy is Hold the Line. The castle itself in effect forms part of the existing defences for the town, so attention will need to be paid to its long-term maintenance in terms of fulfilling this function, whilst respecting the historic fabric. Further discussion on specific measures to ensure preservation of the fabric and setting of the monument will be required as part of the Action Plan.</p> <p>I hope that these comments are helpful.</p>	<p>Regarding Osborne, we hope discussions on 21st September on site resolved your concerns. If you still seek additional monitoring information this should be addressed through the Regional Coastal Monitoring Programme. Regarding Yarmouth Castle, detailed consideration of the future protection of the site will be examined as part of the upcoming West Wight Coastal Defence Strategy Study.</p>
<p>Southern Region Flood Defence Committee</p>		<p>Thank you for sending me a copy of the Draft SMP2. It will certainly be useful.</p>	<p>Thank you for this comment.</p>
<p>Environment Agency - Solent and South Downs Area FCRM Manager</p>		<p>Following our involvement in the Client Steering Group and our reviews of drafts of the SMP2 and subsequent input into the documents as presented in the Public Consultation, we have no further comments on the Public Consultation documents. This statement has been approved by John O'Flynn (Solent and South Downs Area FCRM Manager).</p>	<p>Thank you for this comment.</p>

Stakeholder	Policy Unit	Comments	CSG Response
Hampshire and Isle of Wight Wildlife Trust	All	<p>Thank you for your letter of 22nd July together with the team responding to our questions at the open day at Ryde on 14th September.</p> <p>In responding to this consultation we declare an interest in owning and managing land within the coastal landslips of the Undercliff. In preparation to this response we have re-visited a number of sites across the Island with a particular emphasis on locations subject to contention in the past.</p> <p>Our comments relate both to the broad policies expressed in the draft plan as well as comments on individual proposals. We have therefore structured our comments slightly differently from that suggested in the response form.</p> <p><u>Overview</u> We welcome the production of this draft as it assists in bringing clarity to issues of great interest and concern to Islanders and to the wider public.</p> <p>We are particularly pleased with the emphasis the plan gives to identifying risks from coastal instability and flooding. The recognition that adaption is an essential part of the suite of responses is helpful in drawing together a plan that is sustainable. We particularly welcome the recognition that new coast defences are unlikely under current financial constraints and that the long term retention of all defences, such as at Castlehaven, cannot be guaranteed. We similarly welcome the recognition that the A3055 is unsustainable on its existing alignment and that detailed consideration will need to be made to adapt to breaches in this part of the Island's infrastructure.</p> <p><u>Comments on individual sites</u> <u>Brading Marshes</u>. PDZ3. We have taken a particular interest in recommendations relating to land historically within the intertidal zone and currently managed as grazing marshes. Our interest relates to the intrinsic issues of individual sites together with the strategic issues relating to such sites across the Solent region.</p> <p>The Brading marshes are proposed to be defended from tidal inundation into the foreseeable future. In this respect the policy position for Brading differs from other coastal grazing marshes, particularly those on the western Yar. The reasoning behind the preferred strategy is not as clearly articulated in the plan as it might be. We ask that the final edition of the plan offers this reasoning in greater detail.</p> <p>Having recently visited the marshes, and having discussed the issues with the RSPB and others, we have been persuaded that the preferred policy option is the correct one. However this reasoning becomes questionable should the marshes not fulfil the Natura 2000 and Ramsar functions that justify their defended status in the plan. In this respect we believe the effective delivery of the water level management plan is an essential element in the justification of the policy to maintain the flood defences of the site.</p> <p><u>St Helens Duver</u>. PDZ3. The Duver at St Helen's is the last substantial sand dune system on the Island. The southern spit of the harbour is currently quarried for sand and gravel and has lost much of biological interest. The Trust welcomes the recognition of the unsustainability of the current management regime of the Duver. We welcome and encourage the proposals to manage a restoration of natural processes. We respect the uncertainty that such a strategy brings to some users of the Duver and request that the implementation of the plan assists in the process of adaption.</p> <p><u>Niton Undercliff</u> PDZ4. We took a particular interest in the Castlehaven area as this defence is relatively new and was highly contentious at the time of its construction. Part of the 'package' associated with this coastal defence was the close monitoring of the response of wildlife to the works. This monitoring would provide data that would inform future options. We are concerned that the scheme of monitoring that should be informing decisions is not being undertaken. As such this undermines confidence in the decision making process and leaves doubt as to the soundness of future discussions and decisions. Given the future management and maintenance of this defence will be subject to future debates we believe it is essential that the commitments to monitor the site are honoured. [continued in the row below].</p>	<p>Thank you for your comments. Regarding individual sites:</p> <p>1) <u>Brading Marshes</u> - The SMP incorporates the policies from the Eastern Yar Flood and Erosion Risk Management Strategy and is based on advice from Natural England. The decision to protect Brading Marshes as a freshwater habitat for 100 years is based on the cost and near impossibility of recreating a similar habitat within a suitable distance, i.e. around the Solent. The text of Chapter 4.4 will be strengthened in the Management Area Statement and in Section 3 to reflect this: "As outlined by the Eastern Yar Flood and Erosion Risk Management Strategy (led by the Environment Agency, 2010), sustaining Embankment Road will primarily meet obligations to protect the internationally protected freshwater habitat in and around Brading Marshes (under Article 6 of the habitat regulations), as well as protecting around 450 properties and the key road between Bembridge and St Helens from flooding to a standard of 1:25 and meets obligations under the Bembridge Harbour railways act."</p> <p>2) <u>St Helen's Duver</u> - Thank you for your comment.</p> <p>3) <u>Niton Undercliff</u> - These comments have some justification but relate to scheme specific management and should not influence the longer term management intent. Changes to the landowner have resulted in access issues, though there have been attempts to overcome these. This is an ongoing matter for the IWC to resolve.</p>

Stakeholder	Policy Unit	Comments	CSG Response
	All (continued from row above).	<p><u>Assessments</u> We welcome what assessments have been prepared but question whether these meet the statutory obligations under the Strategic Environmental Assessment or Habitat Regulation Assessment procedures. We agree with Natural England¹ that the Appropriate Assessment concludes that the Shoreline Management Plan is likely to have an adverse effect on Natura 2000 interests. We had hoped to see the assessments of the plan analysing the habitat changes arising from the plan together with the changes in the structure and function of these habitats and attendant populations. The features that we look to have assessed in the Appropriate Assessment are those relating to the Natura 2000 designations and the Ramsar designations together with the SSSI, SINC and priority BAP interests in the Strategic Environmental Assessment. To understand the issues that need addressing we believe it necessary to consider these features in their own right, collectively in an Island context and then more broadly in a Solent context.</p>	<p>Thank you for your comments, it may be a case of clarifying where this information can be found, which is given as follows. The HRA does in fact take into consideration the habitat types and their structure and function, as given in Table 2.7 of the Stage 3 Report, and discussed in the detailed tables for each PDZ within Annex I-IV of the HRA report. Furthermore, the loss of the 31 hectares of coastal grazing marsh, its function and supporting species as a result of the policy suite in PU6C.5 (Yarmouth Mill and Thorley) is discussed in detail within Appendix L of the SMP2 (Stage 4 of the HRA - which is about to be submitted to Defra). The issues for the international and European nature conservation sites have been addressed at PDZ level, collectively in an Island context and more widely for the whole designated site across the Solent (e.g. refer to Section 15 for PDZ level and Annex I-IV Tables, and Section 16 for the whole SMP2 summary, and Section 17 in combination with the North Solent SMP2).</p> <p>The SSSI, SINC and priority BAP interests are discussed in the SEA, as these are not required to be assessed within the HRA (for example refer to Annex F-III and Table 8.1 in the Appendix F - SEA Environmental Report). Furthermore, the Statement of Environmental Particulars (SoEP) that accompanies the Final SMP2 will list those sites and habitats (international, national and local) that will be affected by the SMP2 policy, along with the required habitat monitoring and management.</p>
		<p>Our concern is that the shortfalls in the assessment do not permit an overview of the issues. The shortfalls also mean it is not possible to identify what works may be required to 'compensate' or 'mitigate' for the changes facilitated by the plan. We therefore have a plan which has been identified as likely to cause an adverse impact on internationally important wildlife without setting out how that challenge is to be addressed</p>	<p>The assessment has been carried out according to habitat type for each designated site within each PDZ and is given in Annex I-IV of the HRA Stage 3 Report, which states whether any mitigation measures are required and whether there is an adverse effect. This is then summarised by PDZ in Section 15 of the HRA Stage 3 Report, and then cumulatively for the whole SMP2 in Section 16. Following the comments from the Quality Review Group and Natural England, we have however added in summary tables for each PDZ to clearly show how each habitat type is affected (i.e. quantitative losses and gains where possible), stating whether an adverse effect or not has been concluded. In addition, the summary table of the whole SMP2 (refer to Table 6.2) has been made clearer. Stage 3 of the HRA report is to conduct the Appropriate Assessment and states what was to happen next (refer to Section 18: Next Stage: Where to From Here?).</p> <p>Stage 4 of the HRA process is to: summarise the assessment of the negative effects on the sites; record the modifications or restrictions considered; test of Alternative Solutions; test for Imperative Reasons of Overriding Public Interest (IROPI); and identify the necessary Compensatory Measures. This has now been drafted following Public Consultation of the Final SMP2 and will be submitted to the Secretary of State shortly. Compensation for any habitat loss will be sought through the Environment Agency's Southern Regional Habitat Creation Programme, which is the Government's recommended vehicle for delivering strategic habitat compensation and are funded in advance of engineering works that cause damage. Therefore, no damage to a Natura 2000 site as a result of a policy can occur, prior to compensation being secured.</p>
		<p>To illustrate this concern coastal features such as grazing marshes are identified in various statutory designations for their special interests. These interests include the use of these areas by Ramsar and Natura 2000 bird populations as part of the complex structure and functioning of the Solent's estuarine ecosystem. The Natura 2000 and Ramsar grazing marshes also contain a range of habitats including freshwater marshes, saline and hypersaline marshes, swamps, lagoons and tidal woodlands. There is no way of knowing from the assessment to what degree these features will be prejudiced by the draft plan.</p> <p>We therefore request that before this plan is finalised the assessments are completed so that proper provision may be made for these important features within the context of a dynamic coastline.</p>	<p>We agree with your comment that the habitats discussed are used by Ramsar and Natura 2000 bird populations, and therefore these are discussed within the SPA and Ramsar site assessment in Annex K-IV, as well as illustrating which species use which habitats in Table 2.5 of the HRA Stage 3 Report. It is also agreed that the grazing marshes also contain a range of habitats, but the assessment is based on the recommendation from Natural England to format the HRA by assessing the habitat groupings rather than individual sub-features. Where there has been an adverse effect more detail of the site lost has been given in the Stage 4 Report (which is Appendix L of the SMP2 and will accompany the Final SMP2). It should also be noted that the HRA for this SMP2 is a high level assessment and we have used the available information, and further studies will be conducted where necessary.</p>
		<p><u>Conclusion.</u> We welcome the draft plan for highlighting the challenges that a naturally dynamic coastline brings to the community and economy of the Island. We similarly welcome the realism in recognising that the forces in question are such that adaption is an essential component in formulating a response. We are concerned that statutory environmental issues have not been adequately addressed and this leaves the plan vulnerable to challenge. If it would assist you we would be happy to explore the thoughts expressed above in greater detail.</p>	<p>We feel that the statutory environmental issues for both the SEA and HRA have been addressed and have been done so in accordance with the Habitats, Birds and SEA Directives, as well as the Habitats Regulations 2010, alongside guidance and much discussion with the CSG (which includes Natural England and the Environment Agency). Hopefully we have provided some clarity on some of the issues raised and pointed out where this information has been recorded. We have taken your comments on board (along with other stakeholders) by improving the presentation of information within the HRA Stage 3 Report (which will be re-issued for your information). Furthermore, subsequent to the Public Consultation stage of the SMP process Stage 4 of the HRA (i.e. IROPI and seeking compensation) and the Statement of Environmental Particulars to support the Final SMP2 are also to be produced, the latter of which is a summary of the environmental findings (SEA, HRA and WFDA) and how they have been incorporated along with consultation comments into the SMP2.</p>

Stakeholder	Policy Unit	Comments	CSG Response
RSPB	All	<p>Thank you for seeking the RSPB's comments on the draft Isle of Wight SMP.</p> <p>Our detailed comments in relation to the various Policy Development Zones (PDZs) within the draft SMP are presented in the attached annex. We also have some more general comments, set out below, in respect of particular aspects of the assessments, and their consequences on the internationally designated wildlife sites.</p> <p>As you are aware, much of the northern coast of the Isle of Wight is extremely important for wildlife both in its own right and as part of the wider Solent and Southampton Water Special Protection Area (SPA). Coastal squeeze and the resulting habitat loss pose a direct threat to these sites, which include internationally important populations of breeding and wintering birds. The SMP provides an opportunity to identify coastal management that can create new habitat to maintain the coherence of the Natura 2000 network. In addition, it also offers opportunities to contribute to the delivery of Biodiversity Action Plan (BAP) habitat and species targets. However, new coastal management proposals may also constitute a threat, and need careful consideration.</p>	<p>Thank you for your comments, it may be a case of clarifying where this information can be found, which is given as follows. The HRA does in fact take into consideration the habitat types and their structure and function, as given in Table 2.7 of the Stage 3 Report, and discussed in the detailed tables for each PDZ within Annex I-IV of the HRA report.</p> <p>Furthermore, the AA has recognised high tide roosting sites as being an important habitat component in its own right. The SMP has teased out this 'function' separately in the AA, as it was recognised as being important. The Isle of Wight SMP2 along with the North Solent SMP2 have been at the forefront in addressing/recognising/assessing high tide wader roost sites. Please refer to Tables 2.8 and 6.2 of the Stage 3 HRA Report. Furthermore, the loss of the 31 hectares of coastal grazing marsh, its function and supporting species as a result of the policy suite in PU6C.5 (Yarmouth Mill and Thorley) is discussed in detail within Appendix L of the SMP2 (Stage 4 of the HRA - which is about to be submitted to Defra, following support from Natural England).</p>
		<p>The RSPB welcomes the assessment work that has been undertaken in respect of the SMP, however we question whether the statutory requirements laid out under the Strategic Environmental Assessment (SEA) Regulations and, in particular, the Habitats Regulations have been fully met. For example, we note that a habitat group approach has been taken to the assessment of impacts on the international sites and, while we broadly support this approach, the Habitats Regulations Assessment (HRA) and SEA must also assess the specific ecological function of the habitats affected by coastal policies. Key international site features, such as SPA bird feeding and roost sites must be carefully mapped and their importance to site integrity assessed.</p>	
		<p>Where such features are considered essential to site integrity, there will be an imperative to maintain such features in situ. However, where this is not possible the Council must be able to identify the locations for the replacement of such features in order to ensure the coherence of the international sites.</p>	<p>Stage 3 of the HRA report is to conduct the Appropriate Assessment and states what was to happen next (refer to Section I8: Next Stage: Where to From Here?), which is Stage 4 of the HRA process - which is to: summarise the assessment of the negative effects on the sites; record the modifications or restrictions considered; test of Alternative Solutions; test for Imperative Reasons of Overriding Public Interest (IROPI); and identify the necessary Compensatory Measures. This has now been drafted following Public Consultation of the Final SMP2 and will be submitted to the Secretary of State shortly. Compensation for any habitat loss will be sought through the Environment Agency's Southern Regional Habitat Creation Programme, which is the Government's recommended vehicle for delivering strategic habitat compensation and are funded in advance of engineering works that cause damage. Therefore, no damage to a <i>Natura 2000 site (or network)</i> as a result of a policy can occur, prior to compensation being secured.</p>
		<p>We appreciate the challenges of delivering replacement habitats at this scale, however, we are extremely concerned by the references to losses of habitat, for example the mudflats at Wootton Creek, as having no adverse effect on the designated sites. Not only has insufficient evidence been presented to support this conclusion at a site level, but the approach fails to consider the cumulative effects of small losses to habitat across the SPA as a result of the proposed coastal defence policies, and does not comply with the precautionary principle required by the Habitats Regulations.</p>	<p>Within the Appendix L (SMP2) report it is highlighted that it is essential that not only does 31 hectares of coastal grazing marsh need to be compensated for but also the same function and structure will need to be replaced so that it provides for the birds that will lose this habitat. Potential areas are identified within this report, since it is necessary for the RHCP to look within the vicinity of the lost habitat, before it looks further afield if it cannot be replaced nearby.</p>
		<p>We are further concerned that the policy unit assessments, in many cases, fail to clearly quantify the losses to the habitat groups at a PDZ level or to provide full details of the compensatory proposals which are required to offset losses to key coastal habitats as a result of SMP policies over the lifetime of the Plan, including losses to intertidal and freshwater habitats, and losses to feeding and high tide roost sites. In addition, the effect of policies on seabird breeding sites, and whether any compensatory sites are necessary does not appear to have been considered.</p>	<p>Thank you for your comments, as a result of these (along with other stakeholders) we have clarified the summaries at PDZ level and for the island as a whole (i.e. cumulatively) by adding in tables to summarise the losses for each habitat grouping for each designated site (refer to the amended Table 6.2 for the cumulative summary). We have also clarified our argument at Wootton Creek (and other locations where necessary), as we still believe and have the support of Natural England that there will be no adverse effect to the SPA or Ramsar site from the policy suite, since over the 100 year period there will be a loss of less than ca. 0.005ha per year, which will be indiscernible from the natural fluctuations within the system. Furthermore, the increase in mudflat habitat from the MR policy at Wootton Bridge will increase the available habitat, and Solent wide mudflat habitats will be increasing over the 100 year period.</p>
		<p>As stated earlier, tables have been inserted within each PDZ summary to clearly present the losses and gains where quantified for each habitat type within each designation, along with stating whether an adverse effect on the site integrity has been included. The required compensatory habitat is presented in Section I6 (Paragraph I6.1.9). The details of what exactly will need to be compensated for is then further detailed (i.e. the need for the coastal grazing marsh to fulfill the function of feeding areas for winter birds and high tide roosts) within the Stage 4 Report (which is to be presented in Appendix L of the SMP2) that will be issued to the Secretary of State. Furthermore, the AA has recognised high tide roosting sites as being an important habitat component in its own right. The SMP has teased out this 'function' separately in the AA, as it was recognised as being important. The Isle of Wight SMP2 along with the North Solent SMP2 have been at the forefront in addressing/recognising/assessing high tide wader roost sites. Please refer to Tables 2.8 and 6.2 of the Stage 3 HRA Report.</p>	

Stakeholder	Policy Unit	Comments	CSG Response
		Losses of SPA habitat will generally need to be replaced outside of the SPA network through a programme of compensatory measures, following assessment and justification under the Habitats Regulations. The competent authority will need to demonstrate that a suitable area of all compensatory SPA habitats can be delivered ahead of the predicted losses to maintain the coherence of the network.	Stage 4 of the HRA process is to: summarise the assessment of the negative effects on the sites; record the modifications or restrictions considered; test of Alternative Solutions; test for Imperative Reasons of Overriding Public Interest (IROPI); and identify the necessary Compensatory Measures.
	All (continued)	<p>This includes compensation of designated freshwater habitats, such as coastal grazing marsh, of which we note that 30.9 ha of replacement habitat has yet to be identified.</p> <p>We recognise that in some places a policy of Hold the Line may be necessary but, in such cases, it is important that the HRA presents the case for 'no alternative solutions' and 'imperative reasons of overriding public interest'. This is necessary to demonstrate that the strict tests of the Habitats Regulations can be met which would then trigger the need to undertake compensatory measures. It is vital that the European sites are fully protected and that damage as a result of future coastal defence policy is only allowed in exceptional circumstances. This demands a robust, systematic and transparent approach to the key tests on alternative solutions and imperative reasons of overriding public interest, and any resulting compensatory requirements.</p> <p>We would also advise that where loss of habitat from coastal squeeze results from privately maintained defences there is still an obligation to provide mitigation or compensation. This is a particular concern where these defences may be at odds with the agreed preferred policy.</p> <p>In summary, to give the necessary level of assurance, we believe that the SMP and its HRA must commit to the following: - Predict, identify and monitor habitat losses resulting from SMP policies for all key coastal habitats. - Replace all priority habitat losses in a functionally like for like manner, at least on a 1:1 basis. - Maintain an audit, or balance sheet, for each habitat type, of: (i) European site habitat losses resulting from SMP policies and (ii) European site habitat gains. - Ensure that habitat gains at any time must exceed habitat losses. - Ensure that the suite of habitats created perform the necessary ecological functions to maintain the species for which the SPAs are designated.</p> <p>The SMP also offers the prospect of contributing to UK Biodiversity Action Plan targets for habitats and species. This contribution should be assessed, and we would recommend the SMP process includes an assessment of potential BAP habitat gains and losses over the SMP's three epochs.</p> <p>We hope that these comments and those in the annex below are helpful.</p>	<p>This has now been drafted following Public Consultation of the Final SMP2 and will be submitted to the Secretary of State shortly, following support from Natural England to ensure that it complies with the strict tests of the Habitats Regulations 2010. Compensation for any habitat loss will be sought through the Environment Agency's Southern Regional Habitat Creation Programme, which is the Government's recommended vehicle for delivering strategic habitat compensation and are funded in advance of engineering works that cause damage. Therefore, no damage to a Natura 2000 site (or network) as a result of a policy can occur, prior to compensation being secured. The 31 hectares of coastal grazing marsh will be lost in Epoch 2, which gives us Epoch 1 to create the Habitat Management Plan for the site and to secure and create the necessary habitat (along with the required structure and function that will be lost at Thorley and Barnsfield streams).</p> <p>The HRA only assesses the policies of the SMP2 and not for privately maintained defences. Where there is a policy of NAI with a caveat that does not preclude the right for owners to maintain their own defences through private funding - the HRA has assessed the SMP2 and is under no obligation to provide mitigation or compensation. It will be the requirement of the private owners to prove that they will not be having an adverse effect on the designated sites and will have to provide information for an AA so that the maintenance works can be approved by the Council. However, that said, it will be included in the Statement of Environmental Particulars, those policies that are either NAI/MR where there are private defences that sit within nature conservation sites so that it is easily identifiable where there may be applications for maintenance works in the future.</p> <p>The losses and gains have already been given within the HRA - Table 6.2 for a cumulative summary. Monitoring requirements are also given in the SEA and SMP2 Action Plan. Any lost BAP habitats will be replaced like for like (i.e. this is the case for the coastal grazing marsh). An audit, or balance sheet, for each habitat type has already been carried out, but this has been clarified and summarised in Table 6.2 of the HRA Report.</p> <p>The BAP habitats have been assessed in the SEA, however they have not been quantified, these can be extrapolated from those BAP habitats that sit within the international designations and extrapolated and presented in the Statement of Environmental Particulars - but no further work will be completed.</p>
	PDZ1	<p>ANNEX: RSPB Comments on the Draft IWSMP. Introduction: Our detailed comments relating to specific SMP Policy Development Zones (PDZs) are presented in the table below. We have not commented on every unit within the PDZs but focus on those which raise particular SPA and Ramsar issues.</p> <p>PDZ1 –Cowes and the Medina Estuary: The RSPB recognises the need to Hold the Line at Newport to protect people and property. However, as you are aware, any losses to the extent of SPA habitat or features will need to be replaced. / We note that an area of ca. 4.1 ha of land to the north of the Werrar Marsh has been suggested as mitigation for the loss of mudflat and sandflat in the inner estuary. However the proposed habitat re-creation is for mudflat and saltmarsh and it is not therefore clear that this will provide the same function as the habitat that will be lost. Further information is also required to demonstrate how tidal inundation of this site will affect the present SPA interest, and whether further compensation will also be required.</p>	<p>Following communications with Natural England it has been deemed that the loss of mudflat within the Medina Estuary is actually a maximum of. 1.7ha over the 100 year period (which is ca. 0.017ha a year) less than previously assessed (i.e. 4.1ha) and that this loss of mudflat in the context of the amount of estuarine mudflat habitat within the SAC and the net increase in ca. 142 hectare of mudflats elsewhere in the SAC over the 100 year period (which will also have a similar habitat function in that they will be estuarine mudflats e.g. the gain within the Lymington estuary) means that the loss is not significant and will have no adverse effect on the integrity of the SAC. It would be difficult to discern this from the natural year round variation in tides, which could mask any potentially negligible loss, as well as from the natural changes that will occur in this estuary due to its steep topography and sea level rise. The amount of loss will be small and indiscernible from the natural variations within the estuary that the birds already experience.</p> <p>Furthermore, the areas that have HTL policies have not been identified as being important feeding areas for waders and waterfowl species. Additional habitat is also being created outside of the SPA (i.e. through the MR of Wootton Creek) which could provide additional nearby feeding habitats. It is therefore also been concluded that there will no adverse effect on the Solent and Southampton Water SPA.</p>

Stakeholder	Policy Unit	Comments	CSG Response
	PDZ2	The RSPB supports policies of No Active Intervention and Managed Realignment at Wootton Creek to improve the quality of the mudflats and saltmarsh. / However we are concerned by the conclusion that the loss of intertidal mudflats at this site as the result of Hold The Line policies will have no adverse effect. While we accept that it is possible that gains in mudflats at King's Quay Creek may mitigate for this loss it must be ensured that the gains occur before the losses. Additionally it must also be ensured that the saltmarsh at King's Quay Creek is able to roll back as predicted. If this results in the saltmarsh rolling back beyond the boundary of the SPA this will become a case for compensation rather than mitigation and will require further assessment under the Habitats Regulations. / We strongly disagree with the application of the de minimus principle for the habitat loss at Nettlesome Point.	<p>The IW Mitigation Strategy estimated a minimum of 0.5 ha (maximum of 1 ha) loss of intertidal mudflats designated within the Solent and Southampton Water Ramsar site for the whole of Wootton Creek. However, this was estimated for the area when a HTL policy was for the entire of Wootton Creek, when now the only areas are policy units 2B.2, 2B.4, 2B.6 and 2B.7, which equates to about 30% of the entire Creek. Furthermore, PU2B.2 is fronted by designated mudflat, PU2B.4 by mudflat though only 11% of this unit is designated, PU2B.6 only has <50m stretch of designated mudflat since it is the ferry port, whilst only ca. 60% of PU2B.7 is designated, with ca. 40% mudflat habitat. Overall therefore, the loss of mudflat due to HTL policy within this management unit is likely to be significantly less than 0.5 ha over the 100 year period and this loss, which will mainly be within PU2B.2, will be difficult to discern from both the natural loss due to the steep topography of this small estuary with sea level rise and the natural fluctuations of the system over the 100 year period.</p> <p>Therefore, it can be concluded that there will be no adverse effect on the integrity of the important wetland habitat of the mudflats that support internationally important wader species for the Solent and Southampton Water Ramsar site. Wootton Creek is used as a feeding ground by some internationally designated wader and waterfowl bird species protected by the Solent and Southampton Water SPA, though they are in this location, they do not occur in numbers of international importance. The combination of the loss of less than 0.5 ha mudflat within the Creek over 100 years (which is too small a rate of loss to affect bird populations), the creation of 15ha of improved feeding habitat in the vicinity as a result of the MR at Wootton Bridge (PU2B.3), and the increase in intertidal mud of 125ha more widely in the SPA, it is therefore very unlikely to affect the feeding of these bird species and thus it can be concluded to have no adverse effect on the integrity of the Solent and Southampton Water SPA.</p> <p>With regards to Kings Quay the defences that have previously existed in this location are no longer functional and therefore a policy of NAI will allow the small creek to continue to evolve naturally with sea level rise and therefore is the saltmarsh begins to shift landward of the SPA boundary this is beyond the implications of the SMP2 but rather as a result of natural change.</p>
	PDZ3	<p>PDZ3 –Bembridge and Sandown Bay: We welcome the proposals for Managed Realignment to restore the natural processes of the last substantial dune system on the Island, at St. Helen's Duver (PU3a.2). We believe that positive efforts to allow the seaward dune system to become mobile again are vital for the dunes and for protecting saltmarsh and mudflats behind. / However this will not happen until the third epoch and we are concerned that the initial policy of Hold the Line will result in the loss of designated intertidal habitat. Again we disagree with the application of the de minimus principle. Mitigation or compensation should be sought resulting in, at the least, no net loss in area.</p> <p>We support the policy of Hold The Line at the Embankment Road (PU3A.4). The RSPB reserve at Brading Marshes is potentially one of the most extensive and valuable areas of freshwater grazing marsh in southern England. We believe that protecting this site from tidal inundation is necessary to protect the internationally important freshwater interests behind the defences. As a European designated site, the freshwater wetland would have to be replaced elsewhere if the defences were not maintained and it is difficult to see where and how this could be accomplished within the existing catchment, or indeed within the wider SPA area. We would like to see the importance of the designated freshwater marsh as a justification for this strategy clearly acknowledged in the SMP. / Further, it is vital that the marshes are allowed to fulfil their designated Natura 2000 and Ramsar functions. The successful deliverance of the Water Level Management Plan is crucial and must be achieved if the decision to Hold The Line at Embankment Road is to be justified.</p>	The application of 'de minimus' was applied and accepted by Natural England as part of the study conducted by Atkins for the Eastern Yar Flood and Erosion Management Strategy was completed in . Detailed analysis of the SPA interest features that use the sandflats within the SPA/Ramsar sites as a feeding grounds was recorded as being <0.1% (and <1% of the birds (waterfowl such as dark-bellied Brent geese and teal) within the study area), which was deemed as having no adverse effect to the integrity of the SPA and Ramsar site. Therefore, no mitigation or compensation is required.
	PDZ4	PDZ4 –Ventnor and the Undercliff: Having viewed the new defences in the Castlehaven area (PU4B.2) we share the concerns of the Hampshire and Isle of Wight Wildlife Trust that the impacts of the new coastal defence on wildlife are not being monitored. We believe that this monitoring should be undertaken to a high standard to ensure that future decisions are undertaken with the fullest possible data.	Thank you for expressing your concern on this issue. It has been assessed that the HTL policy within PDZ will have no adverse effects on the international designations and therefore no mitigation or monitoring will be required in that respect. However, with regards to the Castlehaven Coast Protection Scheme in place and the associated monitoring, these comments have some justification but relate to scheme specific management and should not influence the longer term management intent. Changes to the landowner have resulted in access issues, though there have been attempts to overcome these. This is an ongoing matter for the IWC to resolve.
	PDZ5	PDZ5 –South-west Coastline: The RSPB supports the move to a policy of No Active Intervention for this PDZ, allowing the maritime cliff habitat to evolve naturally.	Thank you for your comment.

Stakeholder	Policy Unit	Comments	CSG Response
	PDZ6	PDZ6 –West Wight: The RSPB is concerned that no compensation has been identified for the loss of coastal grazing marsh from this stretch of coast.	The HRA Stage 3 Report is not required to identify the location of the compensatory habitat that will be needed, other than to state what is required (included its function and supporting species) and by when. Stage 4 of the HRA process (which will be in Appendix L of the SMP2) goes further into the needs of the compensatory habitat as part of the IROPI case to the Secretary of State, which will be sought through the Southern Regional Habitat Creation Programme and is the Government's dedicated resource for delivering strategic habitat compensation and are funded in advance of engineering works that cause damage. Within this report suggestions are made of the possible compensatory habitats within the vicinity of the loss.
	PDZ7	PDZ7 –North-west Coastline: The RSPB supports the policy of No Active Intervention for this zone as this policy approach will be beneficial to the intertidal habitats of the SPA and allow replacement of eroded habitats. However our support is conditional that mitigation measures for the saline lagoons are carried through. We question whether a firm commitment has been made to the necessary management of the saline lagoons in order maintain their integrity as a European site feature.	On further discussion with Natural England it has been deemed that the structures that support the historic salt pans and which are owned and managed by the National Trust since they are historic assets are not coastal or flood defences and therefore do not fall under the remit of the SMP2. Therefore, Newtown Estuary will continue to be undefended throughout and will evolve naturally with sea level rise with a continued policy of NAI throughout the 100 year period of the SMP2. Therefore, no mitigation measures are required. The necessary changes have been made within Section 15.4.43 and Table 7 of Annex I-IV of the HRA Stage 3 Report.
Buglife -The Invertebrate Conservation Trust	All	<p>Buglife – The Invertebrate Conservation Trust is the only organisation in Europe committed to the conservation of all invertebrates. Our aim is to prevent invertebrate extinctions and maintain sustainable populations of invertebrates in the UK. In 2007 we published 'Managing Coastal Soft Cliffs for Invertebrates – a best practice guide' (Whitehouse, 2007) which included specific information on the ecology of soft cliffed coasts on the Isle of Wight, and recommendations on their future management (project supported by the Esmee Fairbairn Foundation). We have also completed habitat and invertebrate surveys of the south west coast from Blackgang Chine to Compton Chine – focussing on the undercliffs and chines (surveys took place in 2005 and 2006, and were supported by the Environment Agency and English Nature).</p> <p>Thank you for granting us the opportunity to participate in the consultation process for the Isle of Wight Shoreline Management Plan. We have the following comments on soft cliffed coastal units.</p> <p>After Dorset, the Isle of Wight is the most important region area in the UK for the conservation of specialist soft cliff invertebrates (Whitehouse, 2007). There are a number of soft cliff sites around the island, which range from being of local importance to national and international importance for their geological and ecological interest (maritime cliffs and slopes are also a UKBAP Priority Habitat). In particular, the cliff sections on the south coast support a great number of rare or restricted species. Many of these species are only found on soft cliffs in the UK, and a high proportion are only found on the Isle of Wight and Dorset.</p> <p>The Isle of Wight is a national stronghold for a number of specialist soft cliff species including UKBAP Priority Species such as Glanville Fritillary (<i>Melitaea cinxia</i>) and Cliff tiger beetle (<i>Cylindera germanica</i>). The flora and fauna of these cliffs is reliant on the continued natural erosion of the cliffs to maintain suitable habitat. Where natural processes are disrupted or lost the associated wildlife is also lost.</p> <p>We are pleased that the SMP recognises the need for allowing natural processes to occur. Our coasts are formed by a dynamic system of erosion and deposition, sustainable management of coastal erosion must work with these processes rather than against them. These natural processes have been operating for centuries, and are what makes the Isle of Wight coast such a fantastically interesting place for wildlife and geology today, and attracts people to live and visit here.</p> <p>We agree that a less interventionist approach to protecting the coast is required. There will be potential benefits to biodiversity from the restoration of natural processes in situations where they have been lost or marginalised. The appropriate management of coastal erosion is a significant factor in the maintenance of many sites of national and international importance for nature conservation. Additionally, management strategies should not neglect wildlife sites that are not afforded statutory protection; provision should be made for the wildlife interest of the wider countryside. We are of the opinion that management strategies that are sensitive to wildlife and promote conservation are key to the successful delivery of the UK's statutory nature conservation obligations and many of the targets set out by the UK Biodiversity Action Plan process.</p> <p>We feel that the SMP is flexible enough to take full account of environmental, social and economic factors, and to allow for any new research that will inform the management further, whilst clearly setting out the long-term management options for the coast.</p>	Thank you for these comments

Stakeholder	Policy Unit	Comments	CSG Response
	All (continued from row above). PDZ3,4,5	<p>Policy Development Zone 3 – Bembridge and Sandown Bay (PDZ3) - We strongly agree with the short, medium and long-term policy for this policy unit of no active intervention on eroding sections of soft cliffs (Bembridge, Whitecliff Bay, Culver and Red Cliff, Luccombe). / Red Cliff is of national importance for its invertebrate fauna and supports many specialist soft cliff invertebrates, many of which are entirely reliant on the appropriate management of soft cliffs (i.e. no intervention in natural coastal processes) for their conservation. Species of particular note include the UKBAP Priority Species the Black-headed mason wasp <i>Odynerus melanocephalus</i> and Long-horned mining bee <i>Eucera longicornis</i>. Red Cliff is also one of only two known sites in the UK for the Red Data Book solitary wasp <i>Nysson interruptus</i>. There are also records of the Large mason bee <i>Osmia xanthomelana</i> (RDB1, UKBAP) from the site, although this species has not been recorded here since 1998 and is now thought extinct in England. / Shanklin Chine to Luccombe Chine is not notified as SSSI, however the cliffs and cliff slopes are known to support eight Red Data Book and 49 Nationally Scarce invertebrate species, including the Long-horned mining bee <i>Eucera longicornis</i> (UKBAP). This invertebrate assemblage is considered to be of national importance and it has been recommended that the site is notified as SSSI (Colenutt & Wright, 2001; Whitehouse, 2007). This area of ecological interest does not include Shanklin Chine itself which is behind cliff protection. The cliffs of Bordwood Ledge and Luccombe Chine support one of only two UK populations of the Red Data Book listed and UKBAP Chestnut click beetle <i>Anostirus castaneus</i>.</p> <p>Policy Development Zone 4 - We strongly agree with the short, medium and long-term policy for this policy unit of no active intervention on eroding sections of soft cliffs (Dunnose, St. Lawrence Undercliff, St Catherine's and Blackgang). / Bonchurch Landslips (SSSI), is a well known site for a number of rare invertebrates. However, the SSSI citation does not mention invertebrates as an interest feature. This is despite the undercliffs supporting a nationally important population of the UKBAP-listed Chestnut click beetle <i>Anostirus castaneus</i> and one of only two UK populations of the Red Data Book spider <i>Episinus maculipes</i>. The boundary of the SSSI ends abruptly just to the north of Bordwood Ledge despite the ecological interest of the cliffs continuing to Shanklin Chine (as discussed above). / The soft cliff slopes and undercliffs from St. Catherine's Point to Steephill Cove are an incredibly rich invertebrate site, particularly for solitary bees and wasps. The site is known to support 13 Red Data Book invertebrates, and 5 UKBAP species including Glanville fritillary <i>Melitaea cinxia</i>, Cliff tiger beetle <i>Cylindera germanica</i>, Long-horned mining bee <i>Eucera longicornis</i>, Dotted bee-fly <i>Bombylius discolor</i> and the Chalk Carpet moth <i>Scotopteryx bipunctata</i>. / The soft cliffs from St Catherine's Point to Chale Bay are also of national importance for their invertebrate fauna – this is discussed in more detail below.</p> <p>Policy Development Zone 5 – Central Chale Bay to Afton Down (PDZ5) - We strongly agree with the short, medium and long-term policy for this policy zone of no active intervention. / The south west coast is the longest continuous stretch of unprotected soft cliff in southern Britain. The amount of unfragmented habitat combined with extensive undercliffs and a southerly aspect has resulted in some of the highest quality soft cliff invertebrate assemblages in the UK, characterised by thermophilic (warmth-loving) species and species associated with groundwater seepages. The cliffs and chines of the southwest Isle of Wight coast are one of the most important soft cliff sites in the UK and are known to support: 5 UKBAP soft cliff invertebrates (Glanville fritillary <i>Melitaea cinxia</i>, Cliff tiger beetle <i>Cylindera germanica</i>, the mining bee <i>Lasioglossum angusticeps</i>, Black-headed mason wasp <i>Odynerus melanocephalus</i> and the Dotted bee-fly <i>Bombylius discolor</i>), 12 Red Data Book and 18 nationally scarce species.</p> <p>/ Buglife welcomes this Shoreline Management Plan (SMP) as a useful base for the future sustainable management of the Isle of Wight coastline. We support the continued shift in policy towards a more sustainable management strategy for the coast in which there is space for both wildlife and people. If you would like copies of our reports please contact us.</p>	Thank you for these comments.
Conservation Areas, IWC Planning Services	All	[Recent consultations on Conservation Area designations will assist coordination on these topics]. We would welcome further discussions on those policy combinations as suggested for Yarmouth (existing) conservation area and the proposed Bembridge conservation area for instance, since these will no doubt raise similar issues to our other designated areas in the future as a result of the policy decisions being made now. We would also like to offer our advice on other heritage assets e.g. nationally or locally listed buildings which could also be impacted in the future by issues such as coastal erosion, construction of new defences and flooding). Having looked through the documents briefly it is very clear that at this strategic level you are aware of and are attempting to strike a balance between environmental, economic and other factors and we are very supportive of this approach. As a Conservation and Design Team, we also have commitments to address climate change, an issue which has been given particular prominence in the governments new PPS5 planning policy statement -planning and the historic environment and we will work with you to achieve this where appropriate. It is also worth confirming with you that we will endeavour to inform you of any new designations - whether this be conservation areas or locally listed buildings, in order that you can take your work forward with the benefit of the most accurate data on the heritage assets of the Island.	Thank you for these comments.

Stakeholder	Policy Unit	Comments	CSG Response								
Solent Protection Society	All	<p>Solent Protection has examined the proposals set out in the Shoreline Management Plan, and would like to congratulate the Coastal Management Team on its clarity and completeness. It is clear that the not only a great deal of technical skill has gone into the preparation of the document, but also much local knowledge and understanding of the needs of the Island and its inhabitants.</p> <p>In general we are entirely content with the policies proposed, and very much hope that when necessary the funding and technologies will be available to implement them. We would like to comment on the proposals for two specific points on the islands coastline as follows:</p> <p>1). Bembridge Point: We note that Bembridge Point, on the eastern side of the entrance to Bembridge Harbour, is programmed for No Active Intervention. We very much hope that it will not be too long before new owners of Bembridge Harbour will be in a position to take steps to maintain it as a harbour, and there must be a possibility that there will be agreement by all concerned that these steps should include restoration of the groyne and/or restoration of Bembridge Point. It would be the greatest pity if the proposed policy of No Active Intervention were to prevent such work being allowed to take place, and for this reason Managed Realignment of Bembridge Point itself, as is proposed for St Helens Duver in the third epoch, would in our opinion be preferable.</p> <p>2). Fishbourne: Solent Protection has noticed that the introduction of the larger ferry St Clare, perhaps combined with the speed at which the ferries negotiate the approach channel, is having a marked effect on the shorelines at Fishbourne. We are therefore pleased to note that the policy for this section of the coast is Hold the Line, at least for the next 50 years.</p> <p>We hope that these comments are of use to the team.</p>	<p>Thank you for these comments.</p> <p>We would welcome your involvement in a future study on erosion impacts at Fishbourne proposed as item 2.3 in the SMP Action Plan.</p> <p>Regarding Bembridge Point, the Eastern Yar Strategy concluded that: Bembridge Point Groyne does not have a flood or erosion risk purpose - ie it does not protect any properties from flooding or erosion. However, it is not causing any problems and does not need to be removed. Coastal monitoring data showed that Bembridge Point has been stable for some time, the groyne forms a core to the point which has aided this stabilisation.</p> <p>There is no proposal to spend public funds to repair the groyne, however, the SMP Steering Group, including the IWC, Environment Agency and Natural England, would not object to private funding to repair and maintain the groyne in theory, subject to the normal planning permissions. The wording of the SMP referring to Bembridge Point in the Management Area Statement for Bembridge Harbour and in Section 3.3 of Chapter 4.4 has been amended to make this clear.</p>								
Hampshire County Council	All	<p>Thank you for consulting Hampshire County Council on the Draft Isle of Wight Shoreline Management Plan 2. The County Council welcomes publication of the draft SMP for public consultation, one of two second-generation SMPs published this year affecting the Solent, the other being for the North Solent.</p> <p>The SMP sets out a comprehensive assessment of the flood and coastal erosion risks to the island and has taken into consideration relevant economic, social and environmental issues to arrive at sustainable coastal defence policies to manage those risks over the next 100 years. However, as is the case with all Shoreline Management plans and coastal strategies, implementation of the preferred management options for the coastline will be dependant on the availability of public and private funding.</p> <p>The SMP will help inform Local Development Frameworks; but it is also an important part of the process of preparing the public for long term change on the coast that will impact on coastal communities. In this regard the County Council is looking forward to working with the Isle of Wight Council to develop the Coastal Communities Adapting to Change (CCATCH) the Solent Project, a County Council initiative (a potential EU Interreg project), should the bid be successful. The aim of the CCATCH project is to "bring together the different concerns and priorities of the coastal communities into a shared understanding of coastal change which will be the basis for agreeing a joint vision for future adaptation in a changing climate".</p>	Thank you for these comments								
Natural England	HRA (Appendix I)	<table border="1"> <tr> <td>HRA:</td> <td>I wonder if a summary up front in document, setting this (2) out, would help the reader.</td> </tr> <tr> <td>Section 17</td> <td>Section 17 in combination: I have been advised by our legal team that 'in combination' not intended to be used to mitigate, and may not be best to describe in those terms. Better to say 1.7ha not adverse IOW SMP 'alone' because 1.7ha over 100 years very small rate of loss on IOW coast and within N2K site there will be a net increase over 100 years. Same thing but worded differently. This avoids complication in S17 of saying don't need to do 'in comb' because adverse alone but then do it to mitigate! This not critical if out of time.</td> </tr> <tr> <td>Section 17</td> <td>While on 17 'in combination' change 'only if no adverse effect on integrity do in combination' to 'where an impact 'alone' is considered to be adverse there is no need to undertake 'in combination' assessment since the adverse effect will need to be fully offset, neutralising the adverse effect.' Note that Defra (Andy Tulley) has questioned this (5) use of the Habitat Regulations. NE SE Region (advised by legal team) happy but we (Chris M) following up with Defra. It's obvious so I am I'm confident we are right!</td> </tr> <tr> <td>15.4.6</td> <td>Info to inform AA: when assessing impacts as 'de minimus' here and elsewhere say the impact is over 100 years to bring that home- otherwise ob face of it los can seem more important. Eg again 15.4.9 Nettlestone Point 0.05 ha over 100 years</td> </tr> </table>	HRA:	I wonder if a summary up front in document, setting this (2) out, would help the reader.	Section 17	Section 17 in combination: I have been advised by our legal team that 'in combination' not intended to be used to mitigate, and may not be best to describe in those terms. Better to say 1.7ha not adverse IOW SMP 'alone' because 1.7ha over 100 years very small rate of loss on IOW coast and within N2K site there will be a net increase over 100 years. Same thing but worded differently. This avoids complication in S17 of saying don't need to do 'in comb' because adverse alone but then do it to mitigate! This not critical if out of time.	Section 17	While on 17 'in combination' change 'only if no adverse effect on integrity do in combination' to 'where an impact 'alone' is considered to be adverse there is no need to undertake 'in combination' assessment since the adverse effect will need to be fully offset, neutralising the adverse effect.' Note that Defra (Andy Tulley) has questioned this (5) use of the Habitat Regulations. NE SE Region (advised by legal team) happy but we (Chris M) following up with Defra. It's obvious so I am I'm confident we are right!	15.4.6	Info to inform AA: when assessing impacts as 'de minimus' here and elsewhere say the impact is over 100 years to bring that home- otherwise ob face of it los can seem more important. Eg again 15.4.9 Nettlestone Point 0.05 ha over 100 years	<p>A summary has been written for the HRA Stage 3 report - providing the relevant designations, the process, the findings of the AA and the next stage i.e. Stage 4 in Appendix L of the SMP2.</p> <p>Changed according to recommendation</p> <p>Changed according to recommendation</p> <p>Changed.</p>
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Stakeholder	Policy Unit	Comments	CSG Response	
		PDZ Habitat Change Tables	PDZ habitat change tables use an asterix to say if change adverse. This not very clear. If possible, but not essential, have separate column to indicate adverse effect at PDZ level, also could put note to explain the YES or NO.	Added in another column which clearly shows whether there is an adverse effect at PDZ level.
		15.4.6	Info to inform: need to change Wootton Creek text, condition assessment changed to favourable since 0.5-1ha coastal squeeze over 100 years too small a rate of loss to affect bird populations.	Changed.
		15.4.35	Newtown; Could you say more clearly that the wall protecting the lagoon is not a current flood protection structure. The coast here is undefended and so NAI continues that management hence any changes are natural change and not contrary to the conservation objectives. The loss of this lagoon over time is not an adverse effect as a consequence of SMP policy. The need to ensure continued representation of our range of habitats where lost through natural change will be achieved through BAP targets.	Changed text so that it is more clear that there are no coastal or flood defences within Newtown Harbour - the salt pans are historic structures and have been maintained that way previously and are under the ownership of the National Trust.
	HRA (Appendix I)	15.5 Title	15.5 title for table? Reads 'Where adverse effect on Integrity cannot be concluded'. This is not wrong to mean 'no adverse effect on integrity', but muddles the terminology making it difficult to understand. Please could the accepted terminology be used everywhere in the doc a. A judgement of 'no adverse effect' is just that, it has to be confident to be made. b. The precautionary approach of Habs Regs, when not sure, is described when we say 'it cannot be concluded that there is not an adverse effect' to mean 'assume adverse effect as precaution', or if confident use words 'there is an adverse effect'.	Changed.
		PDZ 1 Summary	PDZ1 Medina: again note 1.7ha over 100 years as described in row 23 above - I think 1.7ha coastal squeeze mud over 100 years is probably not adverse alone for SAC in SMP, in context of increase in mud in SAC as a whole (see above). I am not inclined to change condition assessment to unfavourable on this basis. This text is less conflicting.	Changed.
		PDZ 6 Summary	PDZ 6 W Yar: 0.6ha inter-tidal SAC over 100 years not adverse, for SPA and Ramsar mitigated by Thorley MR (you may have said this- sorry my notes not good here).	I have not said that it will be mitigated by the opening up of Thorley as it is not adverse alone anyway.
		Section I6 - Table I6.1	S16 SMP Level assessment: Table 16.1 title confusing, again clarify re 11 above.	Changed to make the table clearer.
		Section I5	Have a look and see if the presentation of assessment at PDZ level and N2k SMP level and N2k both SMP's could be made clearer- not essential.	Tables have been added in at the end of each PDZ summary with the loss/gain calculated for the designated habitats.
		General	Feeding and high tide roosts: If this is not a function in habitat groupings as per NS SMP then it should be added in- RSPB doesn't think its there? I haven't looked just assumed was?	This is in the report, as was in the NS SMP AA Report. This is in Table 2.5.
		Table 6.2	We agreed that Thorley Brook would be added as a high tide roost even though not in the data you were given- extraordinary!	This has been added to Tables 2.8 and 6.2 - it was discussed in the text just not mentioned in these tables.
		General	Again change 'cannot be concluded that there will be an adverse effect' text	Changed.
		General - Tables/Figures	For your tables I have noticed that table/figure number for the actual table/figure has been deleted, yet the table/figure number is still referenced in the main body of text. Just check if this is actually intended.	Checked all tables and figures and made sure they are all correct, as well as all the referencing within the text.
		5.3.6	Finally, as stated within the IW Mitigation Strategy, though the losses of intertidal habitats along estuaries could be significant, the requirement for compensation habitat will not necessarily rise proportionately to habitat lost, as in many areas, topography (i.e. natural change), not coastal defences will be the principle constraint to the expansion of these features. Under such a scenario, this is considered natural change and thus not subject to assessment under the Habs Regs..etc or something along these lines	Added in text.
		5.3.8	the 1st sentence even after re-reading, does not make sense. Should read 'where quantities of habitat loss and gain have been quoted as being/having been calculated...	Corrected.

Stakeholder	Policy Unit	Comments	CSG Response	
		Title 5.4	For ease of reading, can the heading/ opening paragraph better 'describe' that this section of the AA assessment is at the PDZ level with reference to final 'island-wide' assessment being made in later part of report. I just found this focus at PDZ level starting with PDZ 2 to throw me (as a reader) a little.	Text added for clarity.
		Page 46: Table 5.2	The summing up of figures could confuse people, as they don't add up properly. I understand we are talking about very small approximations over each epoch, but it may be worth making this clear.	The figures were originally given to 2 or 4 decimal points and it was brought up by QRG that I should round up to 0.5 hectare. I disagreed with up to that but to round up to 0.05 hectare - but this has meant sometimes the figures do not add up. Have amended where possible - or made a note for the reader.
	HRA (Appendix I)	5.4.16	With regards to the groyne. NE advises that in the context of the 'current management situation' of the harbour, the re-establishment of the groyne at Bembridge point can proceed (with private funds only). To make the argument that a new groyne will be opposed in the future based on possible negative effects on 'natural processes' and not allowing that section of coast line to evolve and function naturally is inappropriate given the harbour is highly managed. In fact it may be that the groyne, could help to retain more sediment in the system as less may move in the navigation channel and thus require effort to dredge. Thus, whilst NE would prefer for Bembridge Point to evolve naturally, NE would not object to private money being spent to re-establish a similar groyne, provided there would not be any significant adverse impacts stemming from the groyne.	Amended text within Section I5.4.16
	5.4.21	Perhaps you may want to re-iterate that some policy options where necessary for management of the site (i.e. protect the lagoons – with the strategy going into more detail how these will be managed in the future, i.e. allowing a degree of over topping)?	This is already discussed in Section I5.4.15.	
	5.4.27	Is this is the action plan? If not, are these comments necessary as part of the HRA?	No it is not in the action plan and has therefore been removed.	
	Page 51	For the footers, there are 'spaces' missing in the sentence for footer No. 9.	Amended text.	
	5.4.35	Are the NT defences still maintained? I thought they were redundant. My understanding for the argument for no adverse effect on the lagoons, was that the defences have ceased acting as defences are only relict structures. As such the loss of the lagoons was a direct of natural change and not a consequence of or lack of human intervention. I feel this section needs to reflect this better, especially the statement (at the start) of NT maintaining defences. This statement conflicts with the argument that change is recognised here as natural!	Amended text - see comment in row 45.	
	5.5.5	(the text in red, for the last 2 sentences) – is it appropriate to make such a conclusion that birds displaced at Medina WILL go to Wootton to feed! Can we make this assumption? In the end is this not all about the functionality of a site? Furthermore, I question the appropriateness of using Wootton Creek, where in proceeding sections it is mentioned that not only is there a loss of 0.5 Ha but also a claim that birds don't use that estuary. This could sound a little inconsistent to readers!	It is appropriate and was discussed and advised by Claire Lambert. The text ensures that it is consistent.	
	Page 56	Check your table numbering for tables and with the text . *In addition, I have noticed you tables do not run in chronological order.	Amended.	
	5.5.17	Reference to starlet anemone. This species inhabits saline lagoons. I wasn't aware this species was found in Thorley!?	Reference removed.	
	5.5.18	I'm confused. Will there be HTL here or something else that will impact the grazing marsh? If so, how can you conclude no adverse effect?	HTL for PU6C.6 between Yarmouth and Bouldnor to maintain the road, which will prevent a sudden breach and saline intrusion of the grazing marshes from saline waters.	
	5.5.22	Draw attention to the fact we are talking about compensating function and that this function would likely be required to be recreated near the site.	Amended.	
6.1.6	What about Thorley? Maybe I have missed something here, but I thought the grazing marsh here also served as a high tide wader feeding and roosting site? The claims made here contradict 6.1.5.	Added in the importance of high tide roosts and grazing importance of the grazing marsh around Thorley and Barnsfield streams - Tables 6.2 and 2.8.		

Annex M.IV Quality Review Group Consultation Comments and SMP2 Team Responses to these Comments

Comments	Response
The need to clearly indicate significant negative impact in the SEA assessment tables for where there will be a loss of <i>Natura 2000</i> habitats and where there is a need to make IROPI submission.	This has been dealt with in the Addendum to the SEA ER (Appendix M) and M4.4 of this SoEP.
The need to express the significance of impacts on the SEA receptors and objectives in the summary, and why there were no significant negative impacts on any <i>Natura 2000</i> sites, when the HRA Stage 3 report states there is.	The summary of the significance of impacts has been carried out and presented in Addendum to the SEA ER (Appendix M). At the time of writing the SEA ER it was deemed that there were no major negative impacts (i.e. those that would result in there being an adverse effect on an international designation). However, immediately following the submission of the SEA, further clarification with Natural England deemed that there would be an adverse effect on one <i>Natura 2000</i> site (Solent and Southampton Water Ramsar site) from PU 6C.5. Furthermore, following QRG comments and the public consultation period it was also decided that there would also be a significant negative impact on a second <i>Natura 2000</i> site (Solent and Southampton Water SPA) for the same area.
Ensure that the results of the Habitats Regulations Assessment and subsequent sequence of events are clear to the reader	The Addendum to the SEA ER (Appendix M) advised of the final impacts on the <i>Natura 2000</i> sites following the revisions resulting from public consultation; this is presented in Section M4.4 and M4.5 .
Heritage assets are widely and seriously affected in some of the PDZs, the location, significance of damage/loss and mitigation necessary needs to be clearly indicated	The Addendum to the SEA ER (Appendix M) ensured that a more explicit summary table of the designated heritage assets affected is used, along with clarification of the mitigation measures as agreed following discussion with English Heritage (refer to Section M7.6).
Amendment to the assessment on the impact of the policy within PDZ 7 on the saline lagoons following consultation with Natural England and Isle of Wight Senior Ecologist	The saline lagoons within Newtown Estuary are a designated feature of the Solent Maritime SAC, previously it was concluded that these would be lost due to the SMP2 policy as a result of the loss of the defences around the historic salt pans within the harbour. However, it has since been agreed with NE and Colin Pope (Isle of Wight Senior Ecologist) that the SMP2 does not result in a policy change and that NAI will allow the natural change of the environment, including the saline lagoons which are a habitat feature of the SAC. The National Trust own and manage the structures that support the historic salt pans, however, they are not flood defence or coastal erosion structures. Therefore, it is considered that in fact Newtown Estuary is undefended and will continue to be so with the policy of NAI for the next three epochs. Therefore, there will be no adverse effect on the saline lagoons, a designated feature of the Solent and Southampton Water SPA, Ramsar and Solent Maritime SAC. The Addendum to the SEA ER (Appendix M) documents the effect of the SMP2 policy on the SEA receptors and objectives for PDZ.
Consider the implications of the wording of the 'Landscape' target "No decrease in the quality of the landscape character or visual amenity attributed to natural coastal processes or the management thereof". It was questioned whether this is realistic as an objective as natural processes may sometimes result in a loss of landscape value which will not be controllable by coastal management.	A footnote of making the reader aware of this has been made in the Addendum to the SEA ER (Appendix M).
Make the reader aware of the need for SEA during the strategy stages following this SMP2.	SEA accompanies not only plans, but also the strategy stages, therefore, an SEA will be required for all the subsequent fluvial/coastal strategies, whereas Environmental Impact Assessment will need to accompany specific coastal defence projects. It should be noted that a number of the strategies are already completed (e.g. Eastern Yar Strategy), whilst others are in the process, though presently halted (e.g. Sandown Bay and Undercliff Coastal Defence Strategy).
References to Regional Spatial Strategies (RSS) should be removed, since these have now been revoked by Communities and Local Government (CLG).	The SEA ER is now a historic document and was correct at the time of writing having been completed on the 5th July 2010 (and signed off on the 7th July). However, the RSSs were revoked on the 6th July 2010 by the new Conservative/Liberal Democrat government, however, the High Court has since ruled that the Secretary of State's decision to revoke RSSs was unlawful. This means that regional strategies are re-established as part of the development plan and will be a material consideration in the determination of planning applications and appeals. The Government has confirmed its intention to formally revoke regional strategies by including a provision in the forthcoming Decentralisation and Localism Bill and has insisted in a Chief Planning Officer letter that local planning authorities and the Planning Inspectorate should continue to have regard to the Secretary of State's letter of 27 May 2010 in any decisions they are currently taking.
The SMP needs own the necessary mitigation measures as part of the plan and it needs to be clear how the SMP2 will commit to these.	Where mitigation is required it has been recorded as needed within the SMP2 Action Plan; those that were recommended as a result of the environmental assessments (SEA, HRA and WFDA) have been given in Section M7 of this SoEP.