



# Climping and River Arun West Bank Consultation Summary Report

Part the of the Arun to Pagham flood and coastal erosion risk management strategy

March 2015

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# Introduction

## 1.1 Background

From 1 June 2009 to 31 December 2009, we consulted on the draft strategy with local residents and other people and organisations with an interest in the area. We met many local people to explain our draft recommendations and answer their questions.

Over 300 people came to speak to us at our exhibitions across the strategy area. We received over 200 written responses by letter or email.

The feedback we received from the community challenged us to take a more detailed look at the coastal issues and management options for the section of coast at Climping. Our strategy considers coastal flood and erosion risks together for the coast at Climping and the land adjacent to the west bank of the River Arun. Our reassessment was limited to this one area of the Arun to Pagham strategy and recommendations for all other areas remained unchanged from those presented in 2009. Similarly, the draft recommendation covering River Arun west bank portion of this frontage remained the same as consulted upon in 2009.

This work took longer than anticipated but it was important to get things right. We have since completed a more detailed analysis of the beach at Climping, which indicates that it is more stable than at first thought, but with a limited life remaining as a flood defence.

As a result of this reassessment, we have changed from our previous recommendation requiring that we cease maintenance right away, to select a 'do minimum' option.

This means that we can justify maintaining the existing defences as long as possible to prolong their life, a process called 'patch and repair'. However, the overall economic situation has not fundamentally changed. There is very limited justification to invest central Government funds to continue to maintain the defences.

Some works proposed are unlikely to be affordable from current budgets. We will need to prioritise our limited resources to the communities at greatest flood risk. Even if more central Government funding does become available it will be spent first where it will protect the most properties and other assets.

The key difference between our previous and latest recommendations at Climping and River Arun west bank is the point in time when we can no longer justify further maintenance. We will continue to maintain the westerly section of the frontage which is considered separately because of historic legal agreements.

We undertook a formal re-consultation between November 2014 and January 2015, focused only on the part of the strategy where our recommendation changed. This report summarises the feedback we received from the local community and others from 17 November 2014 to 19 January 2015, on our revised draft recommendations.

# 2. Consultation

## 2.1 Formal consultation

### **FINDING OUT ABOUT THE CONSULTATION PERIOD**

We let people know when the consultation period would start in advance and when it launched in the following ways:

1. Direct contact via e-mail to those that contributed to the previous consultation in 2009.
2. Direct contact via letter to those most affected at Clymping and the River Arun West bank.
3. Direct Contact via letter or phone call to statutory consultees.
3. Press releases & radio interviews.
5. From key contacts such as local councils, MP, local organisations, statutory consultees.

### **AVAILABLE INFORMATION**

Information about the draft recommendations was available in the following ways:

1. The technical strategy reports and appendices, including the Strategic Environmental Assessment Environmental Report which summarises our assessment of the options and draft recommendations on the environment.
2. A Consultation Document summarising the background to the project, how the extra work had been undertaken and the how the draft recommendations had changed.
3. During meetings with those property owners and businesses most affected, explanations were given using maps showing how flood risk may change if the draft recommendations are implemented.

The above information was available in the following ways:

1. Upon request by emailing or calling the project team or our website at <https://consult.environment-agency.gov.uk/portal>.
2. Paper copies were placed at the Environment Agency offices in Worthing and Arun Civic Centre in Littlehampton.
3. At our public meetings held at Clymping Church on 11 December 2014 (7pm to 8.30pm) and at Clymping Village Hall on 19 December 2014 (7pm to 8.30pm).
4. Via an advert which was posted on the Statutory Notices section of our website.

### **PROVIDING FEEDBACK AND REQUESTING INFORMATION**

People could provide feedback to us in the following ways:

1. Attending one of the Clymping Parish Council meetings. Staff with various expertise from the Environment Agency and Arun District Council were available to try and answer questions on the day or in follow up correspondence.
2. Visiting our e-consultation tool which was available from our project webpage.
3. Emailing the project team using the email account: [a2p@environment-agency.gov.uk](mailto:a2p@environment-agency.gov.uk)
4. Speaking or writing to a member of the project team via our customer contact centre.

# 3 Responses to the consultation

Responses to the consultation covered a range of issues and views, including those from residents, landowners, local representative bodies such as parish and town councils, elected members, stakeholder groups, statutory consultees and local companies.

## OVERVIEW OF FEEDBACK

We received 13 responses via our online e-consultation tool. We asked people three set questions to help us understand any concerns and questions raised, and respond to them where possible within the final strategy or through discussions at the implementation stage. The answers to these questions are tabulated below.

We received a total of 26 letters and emails, in addition to the responses above. The majority of these were received by the project email account.

We have directly contacted or met with all those who contributed to the consultation to answer their questions about the strategy and, where required, to clarify our how we reached our recommendations.

### 1. Online e-consultation

#### SUMMARY OF RESPONSES TO SET CONSULTATION QUESTIONS

Are you aware of any information that we haven't taken into account in making this revised assessment?			
Yes	No	Don't know	Total
4	7	2	13
31%	54%	15%	100%

Do you know of any other environmental information or issues that we should be aware of?			
Yes	No	Don't know	Total
3	6	4	13
23%	46%	31%	100%

Do you have any suggestions about how the community can be included in the implementation of the Strategy Appraisal Report's recommendations?			
Yes	No	Don't know	Total
6	3	4	13
46%	23%	31%	100%

## 2. Other correspondence

### KEY OR FREQUENTLY RAISED FEEDBACK

The table below summarises what we feel is the main feedback we have received from people (in their own words). We feel that these comments have been strongly raised, are commonly occurring items and form the main items of the feedback.

In most cases we have used the exact wording of the response received, but some comments may have also been slightly summarised to ease presentation. We have objectively taken all feedback, positive or negative.

Category	Comment/feedback item/questions
Environmental issues	I have visited a landowner in the area, who is now experiencing saline intrusion and reactivation of salt marsh silts around 2 miles inland of the coastal site in question. This affects his whole farm business and makes it increasingly difficult to farm economically.
	I would suggest that it is a good time to approach the landowners in that area, to find out what they see the future is in the potential to farm the area, and to see if there are any opportunities for compensating farmers for land lost to coastal inundation, along with habitat creation.
	Recognising latest issues surrounding power generation for the UK, are there any planned off-shore wind farms in the vicinity and especially within the planned period identified as any such works may impact upon proposed plans.
	This section of the beach was identified as a potential and very beautiful option for the National Cycle Route 2 from Littlehampton to Bognor. It has all the benefits of taking cyclists off the main road and providing cyclists and walkers with the most wonderful direct route with views over the sea and South Downs... however these plans have been blighted due to the lack of clarity of the beaches future. Now a decision has been made by the EA it is requested that the original surface which was constructed of hard compacted hoggin stone, which is a mixture of rough Flint and clay be reinstated / refreshed as much of this construction still exists; and then that the sand and grass growing on the top be preserved so that a pleasant surface for cycling and walking is restored.
Consultation Process	I have been told by your officers at the 2 meetings that I attended 3rd and 11th December'14 that the EA would not be implementing a joined up approach with West Sussex County Council, West Sussex Highways, Arun District Council and Littlehampton Town Council with regards to working out a strategy for the Climping sea defences. Therefore I consider that you are missing/ignoring vital information that you could obtain from these other agencies that would help you in determining a proactive strategy for this very important stretch of coastline.
	Every resident should be included in these consultations, not just owners of property, but residents who rent property as there are a significant number of people living in this area (contributing to the council taxes etc) who are not included in these consultations, therefore your numbers of affected persons is actually much higher than you report. Personally I was excluded also, inspite of the fact that I own 2 properties in the directly to be affected area of Atherington, simply because I am related to a local landowner. The community cannot get involved if they are excluded from the process.

	<p>I think the way this consultation process has been handled from the start in 2009 has been very short sighted and clearly is not designed to allow for future regeneration, growth and development for the residents, business owners, farmers and visitors to the area. The EA claim to be looking forward to a 100 years event, however I fear that this strategy could go down in history in as little as 50 years time, as a tragic loss of the land and communities from Elmer to Littlehampton, simply because of a colossal failure to protect this relatively small area of coastline. There is a 1 in 100 year's opportunity here to protect and save this coastline and the land behind it for what will seem a laughably small amount of money in a few years time.</p> <p>There could be more information to people who do not have a computer.</p> <p>More direct consultation with those affected by your decisions.</p> <p>This is not just about the ingress of the sea this is also about the movement of communities via a sustainable and safe route. Please work with local parish council and in this particular case the local Bognor Cycle forum.</p>
<p>Draft Strategy Recommendations</p>	<p>Many of us on the West Bank find it totally unacceptable that the EA are prepared to 'sacrifice' the farming land, many homes, businesses and a 125 year old golf course on the basis of some 'out of the air' BCR, this despite the announcement by the Government of an additional £2.3bn for flood defence programmes. As it is, it is only by the diligence of a local land owner and the Clymping Parish Council that you have upgraded to 'Do Minimum' to the 500 odd metres of 'non legal frontage' because of its effect on the western area that you are legally bound to maintain. So rather than propose 'bund' protection of the A259 and the western area of Rope Walk after the event restore the 'non legal' frontage in the first place. The West Bank is altogether a different story with the severe erosion taking place over the last 12 months since your building of the reportedly £8bn overspent 'folly' on the East Bank. Therefore urgent protection of the West Bank is imperative.</p> <p>Having reviewed the supporting documentation, the EA's change of direction and based upon the various risks and analyses, albeit I am not resident in the locality, support the proposals as submitted thereby ensuring that the existing defences will be maintained as long as possible to prolong their life and safeguarding the local communities.</p> <p>Clymping and the area around should have the protection that others have.</p> <p>Why should you or anyone else be God as far as people's homes and lively hood are put at risk? The West Bank will be affected, that will mean no moorings = no harbour dues, no fort, no west beach and nature reserve, no golf course, no marina by road only by foot bridge if you are lucky, no homes, that will mean compensation from someone. If the east side can have defences that go over the budget by 7 million pounds, then we should also have some defence. Since the east bank defences have gone in it has put us at more risk the tide runs in faster and only has one way to go that is west, the river mouth needs clearing that would then be wider at the mouth of the river. There is a lot more that could be listed. You need to look again at defences at Clymping.</p>



	<p>I am afraid you have got this totally wrong, just like the project on the East Bank at Littlehampton and those that wish to deny its underlining issues. Since the installation of the east bank flood defences at Littlehampton the west bank has been receiving higher tidal levels, the river seems to be running faster and there is now an ever increasing percentage of tidal surges that are affecting the river and the users. As for the west bank and climping beach and the sea front if you do not continue to protect this area this will inevitably be disastrous for Climping and the west bank. When the Ford eco town was proposed it was stated then that there was saline erosion/ corrosion in the ground working its way up to ford. Unfortunately saline erosion/ corrosion will probably never stop and so the future of the farm land in its way will be lost forever but it does not mean that Climping should not be protected regardless to cost. As for the west bank it is going to cost a lot more than £9 million to protect the west bank over the next 15 years as the prices will rise and you would of got it wrong again. I would like to know where you got your really underestimated findings from.</p>
	<p>I hope that you realise that your 1-10 year standard protection is sorely underestimated again as the west bank and rope walk are having anywhere between 2-5 floods a year and they are gradually becoming more and more severe . You also realise that by doing nothing you will be cutting people of from civilisation as we know it. Once west bank floods the 165 business and the 190 properties will be lost. Lively hoods will be lost or compromised , no moorings , no boats , no Harbour as it will be too dangerous to navigate , No Golf course , No Nature reserve, No fort no west beach. More so you will be ever more compromising west county council highways infrastructure by allowing it to flood and so cutting off all access to and from rope walk and west beach .I wonder if you have thought about the compensation and costs of ignoring this will be not least the damage to the environment agency's reputation. ?</p>
	<p>I am a resident in Ropewalk and I think it Appalling that there is nothing more being done to protect residents and business in Ropewalk</p>
	<p>The (Littlehampton) Town Council's Policy and Finance Committee considered the contents of this consultation at its meeting held on 22nd December 2014 and Members broadly welcomed the proposals.</p>
	<p>My view is that he people of Clymping pay their taxes and should have protection, it does not just affect Clymping village. Places that are not on the coast get protection just because there are more dwellings.</p>
	<p>As I live in Rope Walk I am obviously worried about flooding, so any works to avoid breaches along the River Arun will be appreciated</p>
	<p>As a resident of Rope walk and a council tax payer, I find that my right to live safely without the threat of losing my home to lack of maintenance to our existing flood defences that are already out dated (seems strange that they could be built when our country was in the midst of a WAR) surely we have a right to be protected as much as residents on the East bank !!!!!!!</p>

## 3.1 Project team responses to comments

We have reviewed all of the feedback and comments we received during the consultation period. We have provided a response to the main comments below.

### **General comments about lack of information, more detail on what has been included and that it's difficult to judge as a lay person.**

*Our response:*

We produced two documents for the purposes of consultation; one a simpler summary and another more technical document. Both of these documents were available on our webpage, in public places, at the exhibitions and upon request from the project team. At the beginning of the formal re-consultation, we posted or hand delivered letters giving information about the consultation and inviting comments approximately 200 households in areas most affected by the strategy draft recommendations

We recognise that some people may wish to know more information and ask further questions. Staff with a range of expertise were available at the two public meetings to respond to questions. We also provided a number of clarifications by email/letter to enquiries we received. We are confident we have provided sufficient information and to an appropriate level of detail.

### **The Strategy has failed to take proper account of Arun District Council's Local Plan.**

*Our response:*

The draft local plan was consulted upon along-side the updated Arun to Pagham Strategy. We are as yet uncertain what the finalised plan will specify. The plan does not change the strategy economics but we will take the plan's possible effects in finalising the strategy implementation recommendations for Climping and Arun west bank before we submit for approval.

### **Questions about how historic beach management activities have been taken into account within the strategy**

*Our response:*

The strategy outlines the assumptions made for continuing beach maintenance. We are satisfied that these meet the requirements for strategic appraisal. The strategy includes within its implementation plan, the production of a beach management plan which will be open to comment. Through the consultation, we have suggested the local community may wish to form a group led by residents, through which we could communicate plans and people can voice any concerns.

### **The Strategy fails to properly declare or take account of legal requirements other than the historic legal agreements**

*Our response:*

These requirements will not change the draft recommendations and their effects have been considered in the strategy before it is submitted for formal approval.

**The Strategy does not factor in the effect of the Elmer Rock Islands on both the Legal and non-Legal frontages.**

*Our response:*

The costs for the Climping legal frontage are included along-side other areas in the strategy. These costs are representative of our assessment of the requirements. If these costs increase, this would not change the strategy outcome, only the costs. If these costs do increase, the option for the legal portion of the Climping frontage would remain as 'do minimum legal'.

**The Strategy underestimates the quantity of agricultural land at risk.**

*Our response:*

We have ensured that our estimates are in line with flood risk management guidance for production of strategies.

**The Strategy underestimates the value of agricultural land at risk.**

*Our response:*

We have ensured that our estimates are in line with flood risk management guidance for production of strategies.

**The Strategy fails to take proper account of the potential damages and limitations of mitigating Southern Water's rising main sewage pipeline assets.**

*Our response:*

We will consider this in finalising the strategy before submitting it for approval. Estimates of the total cost implication for this issue range between £140,000, approximately £2million and £9million without economic discounting. Whichever figure is used, the recommended strategy option will not change.

**Questions about how the costs and benefits of Legal frontage have been reflected in the economic assessment.**

*Our response:*

The costs for the Climping legal frontage are included along-side other areas in the strategy. These costs are representative of our assessment of the requirements. If these costs increase, this would not change the strategy outcome, only the costs. If these costs do increase, the option for the legal portion of the Climping frontage would remain as 'do minimum legal'.

**There is a failure to place correct information in the public domain for consultation, namely;** 'Being largely high ground, the Climping Legal frontage is subject to erosion rather than breach and flooding. It does not significantly contribute to the flooding of the rest of the cell, and there are no properties at risk of erosion. Therefore, there are no economic benefits from protecting this area and it has not been included further in the detailed analysis described in this report'.

*Our response:*

We will consider the implications of this issue in finalising the strategy before submitting it for approval.

**The Strategy fails to take any account of the exposed (and eroding) river bank that is formed of the former landfill site. The Environment Agency has a statutory duty to protect the marine environment from this uncontained pollution hazard.**

Our response:

We have considered the presence of this landfill and concluded that it does not change the draft recommendations.

**The Strategic Environment Assessment (SEA) fails to recognise the importance of the local rife and ditch network as a habitat for water voles.**

Our response:

We have considered this information and concluded that it would not change the environmental assessment rankings or the draft recommendations.

**The Strategic Environment Assessment (SEA) only describes the impact of the proposed Strategy options upon the vegetated shingle SSSI, whereas the vehicles transverse the foreshore SSSI during the winter months, the impact of this upon feeding over winter birds has not been properly assessed.**

Our response:

The SEA identifies both vegetated shingle and overwintering birds as interest features of Climping Beach SSSI. All recycling activities are subject to Natural England assent, which is renewed on a yearly basis to ensure impacts on the SSSI are avoided or minimised. Natural England has confirmed that the draft recommendations are likely to lead to an environmentally acceptable solution.

**The Strategic Environment Assessment (SEA) Strategic Environment Assessment (SEA) makes no mention or assessment of the impact of the Southern Water sewage pipes breaking down and polluting the intertidal lagoon habitats that will establish beyond the predicted inundations.**

Our response:

This is not a likely occurrence under any of the options since action would be taken to manage this risk.

**The Managed Realignment option was rejected since it had a BCR significantly less than 1. If the bund is constructed closer to the foreshore, the benefits increase.**

Our response:

We are confident in the decision to reject this option. The positions for inland banks were chosen to maximise the amount of economic benefits for the expenditure.

# 4 Conclusions and next steps

## CONCLUSIONS

We are grateful for the time and effort residents, businesses and interested people have taken to give us feedback and respond to our formal consultation.

The economic benefits at Climping were subject to particular scrutiny and comment by consultees because the benefits value can affect the implementation of the do minimum option. We made people aware through the consultation that the point at which further maintenance is no longer economically justified is subject to change if the benefits are raised or lowered.

Two points of clarification were raised which influence the economic benefit calculation for the Climping non-legal frontage. Feedback from Southern Water indicated that we had undervalued costs due to the impact of flooding on the wastewater pipeline that crosses the tidal floodplain. We were also prompted to re-assess the number of properties at Climping Park which increased from 88 to 102.

We have assessed the effect of benefits changes. This influences recommendations for implementing the do minimum option and has been used by us in updating the implementation section of the strategy. We have also considered whether the benefits changes could influence the outcome of considering incremental BCR for the decision rule.

Sensitivity tests included in the strategy and Appendix P highlight our confidence in the choice of preferred option to the Climping (non-legal) frontage, and that there will not be sufficient benefits to justify a sustain option.

Other issues raised during the re-consultation are dealt with elsewhere in this Consultation Summary Report, and their impact on the strategy has been considered.

We recommend that Beach Management Plans (BMPs) are initiated at the earliest opportunity, after approval of the strategy to inform and assist in its implementation. Each BMP should consider how to engage local people, companies and organisations with interests in the plan. Where appropriate, interactions with other sources of flooding should be considered, with communication between all relevant flood and coastal risk management authorities. To ensure that local interests are represented and information can be sent to the right people at the right time, we encourage formation of community lead groups to focus on flood and coastal erosion issues.

We have carefully reviewed and considered all of the feedback we have received during the consultation process. Based on the responses and on our technical, environmental and economic investigations, our draft recommendations will remain the same.

This is because we feel after careful review that, there is nothing we have missed that will sufficiently influence a change in our draft recommendations and our consultation process overall is robust.

## WHAT HAPPENS NEXT

We will be seeking approval for our draft recommendations. Our outline process for gaining approval is set out below.

1. We update our draft strategy appraisal report, which sets out our draft recommendations and the technical work we have undertaken. This will be submitted to our Environment Agency internal review group - we aim to do this by April 2015.
2. Our report and technical work will be reviewed and assessed, and we will meet with the review group to discuss our draft recommendations.

3. Once this group are satisfied that our draft recommendations are valid, we will request the appropriate Environment Agency Directors approve our draft recommendations.

4. Once they have approved them, they become 'final' recommendations and we let people know this has happened. We will publish a Post-Adoption Statement at this time.

Approval of the recommendations in the Arun to Pagham flood and coastal erosion risk management strategy does not guarantee funding to carry out the required works.

If you have any questions or comments on this report, or the strategy project, the email address will continue to be available until the recommendations are finalised.

[a2p@environment-agency.gov.uk](mailto:a2p@environment-agency.gov.uk)

When our draft recommendations are approved, they will become final.

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