

PAGHAM TO EAST HEAD COAST DEFENCE STRATEGY 2008



SAVE OUR SELSEY

FORMAL CONSULATION RESPONSE



About Save Our Selsey

Save Our Selsey (SOS) was formed in January 2007 in response to public concerns regarding the long term future of sea defences around urban Selsey and the surrounding and interconnected coastal frontages.

The group exists to act as a public voice in consultation with the planning authorities (for sea defences) and now represents over 1,450 residents or members of the community with a legitimate claim to the subject.

Since its inception SOS has:

- Increased awareness of the subject in the wider community
- Carried out extensive and thought provoking research into the issue
- Supported the election of two independent district councillors on this subject matter
- Supported residents whose homes are already affected by a lack of maintenance of existing sea defences
- Supported planning applications for individuals and business to provide their own defences
- Engaged with the planning authorities directly and indirectly to affect the contents/policies of the PEHCDS
- Worked with other coastal groups to understand the national issue of coast defences
- Assisted the authorities in the consultation by providing regular press/public comment on the PEHCDS as it has been drafted
- Also publicising the consultation window and asking for responses
- Represented the residents of Selsey on the Manhood Peninsula Steering Group (MPSG) and at other community based events/consultations which are relevant to the issue of coast defences
- Met with and canvassed opinion from businesses, farmers and interlinked parishes to provide a rounded view
- Continuously canvassed opinion from Selsey residents to ensure we represent their overriding feelings

Through our activity and interaction with the community the committee of SOS believes the group still represents the majority view of the local community on this subject and can therefore submit the following response to the 2008 public consultation.

We would like to take this opportunity to thank the PEHCDS project team and the Environment Agency (EA) for continuing to engage SOS during the drafting and consultation and for allowing us to provide literature to residents as part of the 2008 consultation events.

Save Our Selsey – Overriding Policy

Our overriding policy for coastal defences anywhere in the UK is '**Hold the Line**' **SUSTAIN** where homes, businesses and farms are at risk. We believe that any realignment of the UK coastline inland is dangerous and will be difficult, maybe even impossible, to reverse.



Selsey's Urban Frontages – East Beach, West Beach and Selsey Bill

SOS welcomes the decisions in the draft strategy to combine all 3 'frontages' into a single unit and to adopt the policy of **Hold the Line - Sustain**.

However, we believe that the beach from the Coastguard Tower to Bunn Leisure, known as 'The Medmerry Cliffs', should be included as part of the urban frontages. A policy of 'no active intervention' here will lead to:

- Continued erosion along the bank resulting in the loss of the coastal footpath
- An increased threat to the Coastguard Cottages and houses on West Street
- Ultimately expose the rest of Selsey.

By protecting this area, the Site of Special Scientific Interest (SSSI) is also saved for the future.

We are also concerned by the reduced likelihood of funding for the proposed policy and what a policy without funding will mean for the residents of Selsey as this does not appear to have been properly addressed in the Planning for the Future document.

Medmerry

Despite the fact that with Selsey's £billion asset value, Medmerry will attract a high score on the CBA, the proposed option of realignment is the cheapest option available. We fundamentally disagree with realignment anyway but even more so when 'done on the cheap'. The conclusions reached only highlight the inadequacies of Government policies for coastal management. We expect Government to pay for top specifications for our navy, army and air force procurements for defence but we get the cheapest option for coastal defence. We urge the EA to report this failure to Government.

Loss of Houses

We are extremely concerned that the EA's current summary document "Planning for the Future" makes no reference to the loss of houses (9 under the preferred option for Medmerry realignment and 8 under Medmerry Cliffs' "no active intervention") with **no compensation** payable. This lack of transparency may mislead the residents of Selsey as they are not in possession of the real facts.

Capability of the Proposed Policy

We still doubt that realignment will create a stable tidal inlet given the ferocity of the seas at Medmerry during a south westerly storm. Alternative schemes seem to have been dismissed after casual consideration, on vague assumptions that they may have detrimental effects. Even the recent "Going Dutch II" recommendations have all but been ignored despite the £10,000 of public money used to fund the event. The realignment of Medmerry would also add another 6 to 8 km to the coastline which will need monitoring and maintaining at a cost to the taxpayer.

Food Shortages

It is predicted there will be a world-wide shortage of food in the near future with an ever increasing pressure on farmland for crop production. Now is not the time to abandon valuable farmland and risk saline intrusion of the hinterland behind a realignment scheme.



Medmerry - Conclusion

The reality is that to try and adopt a different policy which would not attract government funding would simply mean Medmerry's defences are left to erode further and introduce uncontrolled flooding of the surrounding area, exposing Selsey's urban western flank.

SOS could therefore be encouraged to support realignment at Medmerry if, and **ONLY IF:**

- The landowners and the community agree with it
- Any loss of land/property is fully compensated (guaranteed)
- The community/landowners are fully involved in the design/specification/siting of the defences
- There are assurances regarding the long term maintenance of any defences for the policy timeframe of 100 years.
- The community must also be allowed freedom of access to the area when realignment is complete.



Funding

We are appalled by the conclusion that central Government funding for Selsey's urban frontages is deemed 'unlikely' and it is clear that the key issue for any policy here will be MONEY and where it comes from.

Taxation

As citizens of the UK we fully accept that our taxes have been used to protect and develop other regions of the country and have also been used overseas to 'protect' the inhabitants of other countries.

As residents of the Chichester district we also accept that local taxes raised from individuals and businesses are used in other parts of the district to the benefit of the district community.

However, we do NOT accept central government's policy of abandoning the defence of coastal communities such as Selsey on a matter of cost alone.

Defending and defining the coastline of Great Britain is a national issue which must attract national funding. Selsey and the surrounding area have a massive part to play in 'UK PLC' and should therefore enjoy a nationally funded programme of coast defence.

Value for Money

The EA **MUST** look closely at its procurement costs for coastal defence materials as recent discussions have shown some current costs to be unacceptably and unnecessarily high meaning better options for coast defences (especially at Medmerry) have been overlooked due to their perceived high cost.

Habitat Creation/Social Justice

The present Government policy that is likely to grant money to the realignment of Medmerry because of habitat creation, but is unlikely to grant money to sustain the urban frontages of Selsey indicates that wildlife habitats are still more important in Government circles than communities, people, homes and businesses. This is wrong and must be reviewed before more of our valuable land is turned over to habitat, forcing people and business to abandon. A scheme/policy which puts social justice at the forefront of any decisions must be adopted.

Interim Funding

It is very important that Chichester District Council (CDC) increases its funding for coastal defence maintenance as the urban frontages are now showing signs of deterioration and must be suitably maintained in the interim period prior to the new Coast Defence Strategy coming into force.

Funding Consultation

It is vital that there is comprehensive community involvement in the discussions over future funding of Selsey's coastal defences and SOS looks forward to participating, along with other local associations and councils.



Cost Benefit Analysis (CBA)

The 2008 CDS has highlighted major issues and discrepancies in the Government's method for calculating the benefit of the land and property any defence scheme will protect.

Taking average values and using nationally applied criteria risks introducing blight to areas with a lower average property value or demographic make up. By underrating property and land values, schemes fail to gain sufficient points meaning they are not defended and are put at unnecessary risk from flooding, further reducing property values and lowering the demography of the locality.

The use of average costs also does not consider unique qualities of the locality; in Selsey's case the increased value (£10k per acre) of farmland due to the local growing conditions or the presence of Bunn Leisure and the tourist £'s it generates.

The main issues specific to Selsey we would like to highlight are:

- The CBA uses current average asset value only and does not consider future development or an increase in the asset value during the 100 year timescale
 - The proposed development at Selsey Gate 2 would add almost £40m to Selsey's asset value at CBA rates - an increase of 4% on the asset value.
- 100 Yr timeframe is absurd and no other Govt. department uses 100 yrs for costing
 - The HM Treasury long term fiscal cycle is only around 30 yrs
- In tourism terms the CBA only values the loss of a caravan not the associated revenue it generates
 - CDC value Bunn Leisure at £50m to the local economy (Selsey report 2000)
 - The CBA says the loss of Bunn (in total) would be around £6.2m
 - The CBA ignores the multiplier effect of £1 spent actually equalling £3 to the local economy
- The CBA allows the use of Selsey's £1billion asset for Medmerry but not for urban frontages
- Some scheme costs are understated to 'sway' the points (B2145 raising at Ferry point)
- Material costs are over inflated (see value for money section)
- The CBA uses asset depreciation rates to calculate practical life of defences
 - A groyne is written off in x years but could offer protection for y years
- The 'Transfer of payments' suggests that caravans can be relocated with no loss to UK PLC
 - Which council will sanction the development of Europe's largest caravan park on their land should Bunn be flooded
 - What about the loss of tourist £'s to Selsey?
 - Local employers/retailers would be forced out of business by the lack of tourist £'s
- The CBA uses assumed costs which can change dramatically from strategy to scheme, changing the points balance



Community Consultation

A clear message that came out of the recent 'Going Dutch II' event was that 'a plan that does not have the approval of the community is not a good plan'. The membership and committee of SOS believe this is a very true statement and that the first stage of the consultation on coastal defences did not deliver a good level of community involvement.

However, the second stage of the consultation and dialogue has been much more effective and constructive - but still lacks community approval. We therefore trust that the PEHCDS project team, local, district and national Government and planning authorities will continue to work with the community once the consultation period has ended and the strategy goes forward for review, adoption and scheme planning.

SOS looks forward to participating in this ongoing engagement on behalf of the community.

Conclusion

As an island nation, any policy which turns over valuable and usable land to the sea is fundamentally wrong, especially when ground breaking and cost effective defence options exist to protect it.

We believe that central Government needs to review this policy and reconnect with commonsense by properly funding the coast defences of Selsey and the Manhood Peninsula.

THE PEOPLE OF SELSEY DESERVE IT.

For and on behalf of Save Our Selsey

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