



# Strategic Environmental Assessment (SEA) for the Christchurch Bay & Harbour FCERM

Statement of Environmental Particulars

November 2025

## Quality information

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# 1. Introduction

## 1.1 Background

- 1.1.1 The Christchurch Bay & Harbour Flood and Coastal Erosion Risk Management Strategy (hereafter referred to as 'the Strategy') has been developed collaboratively by AECOM and the Project Team, which consists of officers of Bournemouth, Christchurch and Poole (BCP) Council, New Forest District Council (NFDC), and the Environment Agency. As part of the Strategy, AECOM were commissioned by BCP Council to undertake a Strategic Environmental Assessment (SEA).
- 1.1.2 This Statement of Environmental Particulars (hereafter referred to as 'the statement') indicates how environmental and consultee considerations were taken into account during the preparation of the Strategy. It also explains how the final approach implemented through the Strategy was selected and adopted. The statement then goes on to set out the monitoring procedures that have been put in place to monitor the potential significant environmental effects that may arise as a result of the implementation of the Strategy.

## 1.2 Strategic Environmental Assessment

- 1.2.1 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects.
- 1.2.2 The Environmental Assessment of Plans and Programmes Regulations 2004 (otherwise known as the SEA Regulations) (SI 1633, 2004) require an environmental assessment to be carried out on certain plans and programmes that are likely to have a significant effect upon the environment. Applying the SEA process to flood management plans, including any plan for medium to long-term river or coastal management, is not legally required. However, adopting the SEA approach is strongly encouraged by the Department for Environment, Food and Rural Affairs (DEFRA) to allow a strategic approach to managing the coast. As a result, a full SEA process has been carried out for the Strategy which satisfies the requirements of the SEA Regulations.
- 1.2.3 In addition to the SEA, a separate Habitats Regulations Assessment (HRA), Marine Conservation Zone (MCZ) Assessment, and Water Framework Directive (WFD) Assessment have been undertaken to support the development of the Strategy.

## 1.3 Statement of Environmental Particulars

- 1.3.1 Regulation 16 of the SEA Regulations sets out the post-adoption procedures for an SEA, and requires that, as soon as reasonably practicable after the adoption of the plan for which the SEA has been carried out, the plan-making authority must make a copy of the plan publicly available alongside a copy of the SEA Environmental Report and an SEA 'adoption statement', and inform the public and consultation bodies about the availability of these documents.

- 1.3.2 To meet this requirement, a Statement of Environmental Particulars should be prepared for flood risk management strategies (including flood and coastal erosion risk management strategies) where an SEA has been undertaken.
- 1.3.3 This statement therefore accompanies the Strategy, and comprises the final stage in the SEA process.
- 1.3.4 It is structured as follows:
- **Chapter 2** sets out how environmental considerations were integrated throughout the development of the Strategy, as well as the influence of the Environmental Report on the Strategy.
  - **Chapter 3** describes how consultation responses have been taken into account through the Strategy / SEA process.
  - **Chapter 4** sets out the reasons for selecting the adopted Strategy in light of the reasonable alternatives explored through the Environmental Report.
  - **Chapter 5** outlines the environmental monitoring measures that will be put in place during the Strategy implementation.

## 2. Integration of environmental considerations

### 2.1 Introduction

2.1.1 Those developing the Strategy should seek to ensure that the potential significant effects of the leading options on the environment identified through the SEA are considered throughout the development and implementation of the Strategy.

### 2.2 Integration of environmental considerations

2.2.1 Environmental considerations were integrated throughout the development of the Strategy by following the SEA Regulations. The SEA informed and influenced the development of the Strategy by identifying environmental considerations and setting out proposed mitigation measures where significant negative effects were identified. This ensured that the potential significant effects of the Strategy on the environment were considered, mitigated or compensated throughout its development.

### 2.3 Influence of the Environmental Report

2.3.1 The Environmental Report was made available to the statutory consultees, which influenced the development of the plan. Where significant negative effects were identified, appropriate requirements for mitigation and environmental enhancements were identified. These are set out in **Table 2.1** below.

2.3.2 **Table 2.1** makes reference to Option Development Units (ODUs). These are sections of the Strategy coastline in which options were identified and appraised.

2.3.3 **Table 2.1** also suggests the responsible parties for undertaking the mitigation / enhancement activity but at this stage these commitments have yet not been agreed to.

2.3.4 Mitigation actions outlined in the Strategy HRA and WFD assessments have also been included in **Table 2.1** for completeness.

**Table 2.1 Requirements for mitigation and environmental enhancements**

| <b>SEA topic</b>              | <b>Agreed mitigation / enhancement activity</b>  | <b>Suggested Responsibility</b>                       |
|-------------------------------|--|---|
| Climate change                | A carbon assessment has been undertaken for the Strategy which provides a high-level estimate of the carbon impacts of the leading options. When schemes to manage the flooding and erosion risks are developed following the Strategy then opportunities for reducing the embodied carbon impact will be explored. The Strategy carbon assessment will provide a benchmark against which to compare the carbon impact.  | BCP Council / NFDC / scheme delivery team             |
| Landscape                     | In numerous ODUs upgrading the existing or constructing new coastal defences has the potential to impact the landscape. Any adverse impact on the landscape will need to be considered during the design of a scheme. Mitigation could involve using locally sourced building materials, using materials in keeping with the existing environment and sensitively landscaping new structures / features.   | BCP Council / NFDC / scheme delivery team             |
| Historic Environment          | The delivery of the leading options in some units could lead to erosion / flooding of historic features and/or designated assets. Mitigation will involve undertaking a programme of recording to monitor the impacts and findings of the erosion / flooding on these features and designations. Subject to which leading option is delivered, this mitigation could be required in ODUs 1-11. ODUs 1 and 6 were identified as key areas for this monitoring in the development of the SEA.          | BCP Council / Historic England                        |
|                               | The delivery of the leading options in some units could lead to construction in close proximity to historic features and/or designated assets. Mitigation will be required during scheme development and design to ensure that new defences consider the heritage features / character of the area. This could include selecting appropriate alignments, defence geometry and finish / materials. Subject to which leading option is delivered, this mitigation could be required in ODUs 4-12 & 17. | BCP Council / NFDC / scheme delivery team             |
|                               | In ODU 6 it is recommended that further work is undertaken prior to delivering the leading option to better understand how each heritage asset may be impacted by increased flood risk. This should be followed by a scheme level option heritage study to explore options for mitigation on an asset by asset basis.  | BCP Council / Historic England / scheme delivery team |
| Biodiversity and Geodiversity | In numerous ODUs defence maintenance and construction works have the potential to lead to adverse effects on habitats and species and lead to disturbance. Mitigation will involve appropriate timing of works to avoid sensitive periods, such as the over-wintering season, breeding season, or periods of spawning migration. In addition, other mitigation such as noise control measures and silent piling could also be undertaken.  | BCP Council / NFDC / scheme delivery team             |

| SEA topic                      | Agreed mitigation / enhancement activity   | Suggested Responsibility                  |
|--------------------------------|--|---|
|                                | In numerous ODUs upgrades to defences or construction of new defences could lead to encroachment into intertidal habitat areas or European designated sites. Mitigation will involve aiming to minimise defence encroachment during scheme design and if encroachment cannot be avoided then the loss will need to be quantified during the design stage. If mitigation or compensation for the loss is required then this should be agreed with the competent authority. If it is not possible to achieve compensation in the European site then it may need to be compensated via the regional habitat compensation programme. Scheme level HRA may be required to determine the mitigation required in more detail and to support alignment decisions, for example in ODU 18. | BCP Council / NFDC / scheme delivery team |
|                                | In ODUs 3, 9 and 10 there could be intertidal habitat loss in the future due to coastal squeeze. Mitigation for these units as part of the leading options includes exploring opportunities for saltmarsh restoration, such as encouraging accretion, saltmarsh planting or fencing.   | BCP Council / scheme delivery team        |
|                                | Beach nourishment as part of the leading options has the potential to impact the physical regime of European sites or impact designated waterbodies. Mitigation will involve ensuring that nourishment material has similar sediment characteristics / grain size to existing beaches and that it comes from licensed dredge areas.  | BCP Council / NFDC / scheme delivery team |
|                                | Delivery of the National Economic option in ODU 1 could result in adverse impacts to the Dorset Heaths SAC and Dorset Heathlands SPA. As mitigation it is the aspiration to undertake the Local Aspirational option in ODU 1 which would not lead to adverse impacts. However if this is not achievable then the potential adverse impacts to these designations will need to be considered further during the delivery of the national option.  | BCP Council / scheme delivery team        |
|                                | In ODU 7 within the River Avon SAC careful timing of defence works will be required and may need to be undertaken at low tide to reduce the impact on turbidity / river morphology.  | BCP Council / scheme delivery team        |
| Land, soil and water resources | In numerous ODUs defence maintenance and construction works have the potential to impact water quality. Mitigation will involve using sensitive construction techniques as set out in the Environment Agency's pollution prevention for business guidance.   | BCP Council / NFDC / scheme delivery team |
|                                | There are a number of outfalls and marina / boat storage areas within the Strategy frontage that can release bacteria. Bacteria can settle within sediment in the water column and therefore mitigation could be to undertake any construction works in the vicinity of an outfall 48 hours after a discharge, once the exposure risk has reduced.   | BCP Council / NFDC / scheme delivery team |

| SEA topic                  | Agreed mitigation / enhancement activity   | Suggested Responsibility                  |
|----------------------------|--|---|
|                            | The National Economic options in ODUs 3 and 4 could lead to the erosion of historic landfill sites in the future. Mitigation is required to further investigate historic landfill sites along the Strategy frontage to better understand the contamination status of these sites. This will enable plans to be made and controls put in place to manage any risks to the environment / human receptors.                                  | BCP Council / scheme delivery team        |
| Population and communities | There is no provision in the Strategy for compensating damage or loss of private properties as a result of flooding or erosion.<br>When schemes to manage the flooding and erosion risks are developed following the Strategy then consideration of public access to coastal areas will be made as part of the scheme design.  | BCP Council / NFDC / scheme delivery team |
| Transport and movement     | There is no provision in the Strategy for compensating for disruption to transport links as a result of flooding or erosion.<br>When schemes to manage the flooding and erosion risks are developed following the Strategy then consideration of how transport links could potentially be improved as part of the scheme will be made during the design, for example, incorporation of active travel links like cycle path improvements. | BCP Council / NFDC / scheme delivery team |

## 3. Consultation responses

### 3.1 Introduction

- 3.1.1 The procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (2004) require that the Statement of Environmental Particulars includes a description of how the opinions expressed by the public and consultation bodies during consultation on the Strategy and SEA Report have been taken into consideration.
- 3.1.2 Consultation on the draft Strategy and accompanying SEA Environmental Report was undertaken between 5<sup>th</sup> June and 27<sup>th</sup> August 2023. Full details of the Strategy consultation can be found in the Strategy Stakeholder and Engagement Communication Plan and Report (AECOM, 2024) and the Phase 5 Consultation Report (BCP Council Research and Consultation Team, 2024). This Phase 5 Consultation Report includes details of the comments received and the Strategy team's responses.
- 3.1.3 For the SEA report comments were received from Historic England, Natural England, BCP Council, Dorset Wildlife Trust and the Southern Inshore Fisheries and Conservation Authority (SIFCA).

### 3.2 Changes made to the Strategy following consultation responses

- 3.2.1 **Table 3.1** overleaf sets out the consultation responses on the SEA and outlines where they led to amendments to the document or broader changes to the Strategy.
- 3.2.2 **Table 3.2** sets out the consultation responses on the other environmental deliverables (HRA report, WFD Assessment report and MCZ Assessment Report) and outlined where they led to amendments to the documents or broader changes to the Strategy.

**Table 3.1 Consultation responses and actions taken on the SEA**

| Consultee        | Comment number | Summary of comments on the draft version of the SEA  | Action taken to finalise the SEA and Strategy  |
|------------------|----------------|--|--|
| Historic England | 1              | <p>General comment:</p> <p>Christchurch Bay and Harbour contain areas rich in built and natural heritage, with a number of heritage assets designated at the highest level nationally. These include the Grade I listed Highcliffe Castle, the Multi-period landscape on Hengistbury Head (a scheduled monument of remarkable size) and the Pre-Conquest monastery, early Christian cemetery, Augustinian priory and motte and bailey castle at Christchurch (a scheduled monument) which has numerous listed buildings within and around it. In addition to this, immediately east of the strategy area, and influenced by coastal processes within it, is Hurst Castle (a scheduled monument) and associated listed buildings. Of these nationally significant assets, it is the view of Historic England that this FCERM strategy would result in significant adverse effects on both Hengistbury Head and Christchurch Priory precinct, while impacts on Hurst Castle are currently uncertain. In relation to these assets we consider that further work is required in advance of adoption of the strategy, in order to</p> <ul style="list-style-type: none"> <li>• More fully justify the selection of leading options.</li> <li>• More fully assess and describe the heritage impacts.</li> <li>• Identify potential mitigation measures to address these impacts.</li> <li>• Identify specific monitoring indicators, and how these may lead to future action.</li> </ul> <p>Historic England will give further consideration to whether any of these assets should be placed on the Heritage at Risk Register.</p> | <p>- In each ODU section, more detail was added to the assessment findings section, using detailed information provided by HE on what the assets are in each ODU and their significance.</p> <p>- A summary paragraph was also added under each option scoring providing justification for the heritage score.</p> <p>- Where leading options have a negative impact, mitigation / monitoring requirements have been identified.</p> |
|                  | 2              | <p>General comment:</p> <p>As a general point, the attention paid to heritage within the SEA is limited, both in terms of the significance of the assets that may be affected, and the nature of any potential impacts. Historic England's Advice Note on Sustainability Appraisal and Strategic Environmental Assessment (HEAN8) contains useful guidance on this:</p> <p>"3.4 Clarity in assessing impacts specifically on the historic environment is helpful in understanding their relationship to the wider environmental assessment. For example, where scoring techniques are used, adding scores together can mask highly adverse impacts through conflation with less adverse ones. Instead, being more specific about the nature of anticipated negative outcomes can help identify measures to avoid them."</p>  | <p>- The changes made to the SEA in response to comment 1 addressed these points.</p> <p>- In addition, where appropriate a discussion around opportunities for enhancement was also added to the SEA where it was part of the leading option selection.</p>   |

| Consultee | Comment number | Summary of comments on the draft version of the SEA  | Action taken to finalise the SEA and Strategy   |
|-----------|----------------|--|---|
|           |                | <p>“4.1 The report will be proportionate to the type of plan under consideration and the environmental sensitivity of the area in question. However, a comprehensive and robust SEA/SA report may demonstrate the following in respect of the historic environment:</p> <ul style="list-style-type: none"> <li>• The significance of heritage assets (including their settings) within and adjacent to the plan or programme area(s)</li> <li>• How the proposed plan policies and plan alternatives impact on the significance of the heritage assets (including their settings)</li> <li>• What steps can be taken to avoid or minimise any adverse impacts on the significance of heritage assets (including their settings)</li> <li>• What steps can be taken to optimise any benefits to the significance of heritage assets, including their settings”</li> </ul>   |   |
|           | 3              | <p>General comment:</p> <p>At present, bearing in mind the SEA objective to protect, conserve and enhance the historic environment within the Strategy Area, there is insufficient evidence to understand the impact on heritage assets within many of the strategy units, either in terms of direct physical impacts or impacts on setting. We would therefore welcome greater attention within the final SEA to:</p> <ul style="list-style-type: none"> <li>• Describing both the significance of heritage assets and the nature of impact on them (positive and negative), in order to justify and expand upon the findings within assessment tables for each strategy unit. This should preferably include recognition of non-designated heritage assets and the potential for undiscovered archaeology.</li> <li>• Clarity about potential impacts on heritage assets that fall outside of the strategy area, in particular those associated with Hurst Spit / Hurst Castle.</li> <li>• Where impacts are identified, identification of measures to mitigate or off-set them (as required by Schedule 2 part 7 of the SEA Regulations). Currently mitigation and enhancement measures relating to heritage are absent from the SEA report.</li> <li>• A more thorough account of how the strategy will be monitored.</li> </ul> | <p>- The changes made to the SEA in response to comments 1 and 2 addressed these points. This includes a more detailed discussion about mitigation and monitoring throughout the report.</p>  |
|           | 4              | <p>General comment:</p> <p>Based on information in the Shoreline Management Plan and Leading Options Report, there is a clear and pressing need to consider flood risk and coastal erosion processes holistically, at a strategic scale, taking account of modelling of coastal processes. With this in mind, we are concerned about the limited attention within the SEA to dealing with cumulative effects. We suggest that the potential for cumulative effects within all strategy units is reviewed. Where we</p>   | <p>- The cumulative effects section for each ODU was updated with additional details added to provide a more robust assessment. In addition, the cumulative effects for how the Strategy may influence flood and coastal erosion processes in the</p> |

| Consultee | Comment number | Summary of comments on the draft version of the SEA   | Action taken to finalise the SEA and Strategy   |
|-----------|----------------|---|---|
|           |                | <p>are aware of specific plans or projects that may interact with this strategy, we have highlighted these in the detailed table of comments below.</p> <p>As well as for individual strategy units, we consider that cumulative effects should be considered for the strategy <i>as a whole</i>, assessing the interaction between proposals in this strategy and other plans or projects that will influence flood and coastal erosion processes in the wider area. For example, in relation to the adjacent Hurst Spit to Lymington Strategy, the implications of this FCERM strategy for shoreline drift, movement of sediment, impacts on Hurst Spit (and the heritage assets located there) and the related role of Hurst Spit as a defence for other coastal areas to the east.</p>  | <p>wider area has also been incorporated. For example, in ODU 18, a discussion as to how the leading options could impact the adjacent Hurst Spit was incorporated.</p> |
|           | 5              | <p>General comment:</p> <p>The interaction between coastal processes, existing defences and future strategies in Christchurch Bay to the west of Hurst Spit, and the future of Hurst Castle, need to be more fully explored as part of this FCERM strategy and associated SEA. For example, if beach nourishment could have a positive effect on the Spit through longshore drift this should be included in the SEA assessment. Furthermore, as there is a degree of urgency in relation to erosion on Hurst Spit, this may favour those Local Aspirational Options in which beach nourishment is proposed earlier in the strategy period.</p>   | <p>- The interaction between the Strategy and Hurst Spit was expanded upon in updates to the cumulative effects section for ODU 18.</p>                                 |
|           | 6              | <p>Comment on the SEA scoping report:</p> <p><b>Table 6-1</b> – The western extent of the Strategy area, within Christchurch Bay, comprises the tidal extents of the River Avon and Stour. Christchurch is a settlement with great historic depth which contains many designated heritage assets as well as a high potential for buried archaeological remains that may be of national significance. There is a particular concentration of heritage assets in the Castle Street area on the bank of the River Avon which forms part of the FCERM Strategy.</p> <p>This area is also subject to river related flooding, for which we understand the <b>Lower Stour Flood Risk Management Strategy</b> and <b>Lower Avon Strategy</b> are being led concurrently by the Environment Agency. We believe that there is potential for these two strategies to result in cumulative impacts including in relation to the historic environment. This should therefore be reviewed and included in Table 6-1.</p> <p>We also consider that <b>Conservation Area Character Appraisals and Management Plans</b> that are relevant to the plan area should be reviewed and included in Table 6-1, including in particular the appraisal and management plan for Christchurch Central in which the Priory Precinct and Castle area is described as ‘highly sensitive to change’.</p> | <p>- Table 6-1 was updated as suggested by including the additional plans / strategies mentioned in the comment.</p>  |

| Consultee | Comment number | Summary of comments on the draft version of the SEA  | Action taken to finalise the SEA and Strategy  |
|-----------|----------------|--|--|
|           |                | <p>Next, just beyond the eastern end of the Strategy area is Hurst Castle, a historic defensive complex and lighthouse, discussed in the introduction to this response. The erosion of Hurst Spit has a wider functional relationship with coastal processes including those in Christchurch Bay to the east (described in section 3.2.6 of the SEA Scoping report), whereby defences result in reduced cliff erosion and therefore reduced supply of sediment to the spit. The area of the spit is itself located in the adjacent strategy area: <b>Hurst Spit to Lymington FCERM Strategy</b>. We understand that the project teams are collaborating, and therefore consider that the emerging Hurst Spit to Lymington Strategy should be reviewed and listed in Table 6-1.</p>   |  |
|           | 7              | <p>Comment on the SEA scoping report:<br/> <b>Section 6.2.1</b> – Having regard to our comments above about Hurst Castle, we consider that the scheduled monument and listed buildings at this site are potential receptors of heritage impacts (positive or negative) arising as a result of this Strategy. We therefore request that these assets are identified on the map at Figure 6-1, and highlighted in sections 6.2.1.1 Listed Buildings, and section 6.2.1.2 Scheduled Monuments.</p>  | - Figure 6-1 was updated as suggested by the comment.  |
|           | 8              | <p>Comment on the SEA scoping report:<br/> <b>Section 6.2.1.1</b> – Listing is a national designation. We suggest that the reference to ‘local grade’ listed buildings is removed to ensure that these are not confused with ‘local lists’ managed by local authorities.</p>   | - The wording of this section was updated as suggested by the comment.   |
|           | 9              | <p>Comment on the SEA scoping report:<br/> <b>Section 6.2.3</b> – This section states that at FCERM Strategy level, it is not considered necessary to include further detail on other archaeological features beyond designated sites. It is not necessarily helpful to exclude further consideration of sites on the Historic Environment Record at this stage and we have therefore referred to some of these throughout our comments.<br/><br/> It is also important to note that there are several parts of the coast that feature types of sites or remains that do not fit the scheduling criteria but are nevertheless considered nationally significant – for example Palaeolithic sites. Under the NPPF (footnote 68), non-designated heritage assets which are demonstrably of equivalent significance to scheduled monuments are given the same level of policy protection as designated heritage assets.</p> | - The wording of this section was updated to outline that in addition to the designated sites identified and considered in the FCERM Strategy, it will be important for future FCERM Schemes which emerge from the Strategy to adequately consider impacts not only to these designated assets but also to evaluate and mitigate potential impacts to other nationally significant sites, and non-designated heritage assets, once scheme options and details are developed. |

| Consultee | Comment number | Summary of comments on the draft version of the SEA   | Action taken to finalise the SEA and Strategy   |
|-----------|----------------|---|---|
|           | 10             | <p>Comment on the SEA scoping report:</p> <p><b>Table 6-4</b> – The management unit ODU 4 runs along the edge of Wick Village Conservation Area, which therefore needs to be included in Table 6-4.</p>   | - Wick Village Conservation Area added to Table 6-4 as suggested  |
|           | 11             | <p>Comment on the SEA report:</p> <p><b>Section 3.1.2: Biodiversity and geodiversity</b> – This section would benefit from a paragraph highlighting the rich geological and paleoenvironmental resource of the area, which includes geological Sites of Special Scientific Interest along significant lengths of cliff frontage.</p>  | - This information was added to section 3.1.2 as suggested.   |
|           | 12             | <p>Comment on the SEA report:</p> <p><b>Section 3.1.2: Historic environment</b> – The fourth sentence could helpfully be expanded and clarified to say ‘Buried archaeological resources could also be at risk in the future, through the loss of land by erosion, inundation, or the construction of new coastal defences’.</p>   | - The text in section 3.1.2 was amended as suggested.   |
|           | 13             | <p>Comment on the SEA report:</p> <p><b>Section 3.1.3</b> – In order to recognise aspects of the historic environment that may be at risk from flooding and coastal erosion, we welcome the inclusion of SEA topics dealing with geodiversity, landscape, and the historic environment.</p> <p>However, with the SEA objective to protect, conserve and enhance the historic environment within the Strategy Area, the report contains insufficient evidence to understand the impact on heritage assets within many of the strategy units.</p>   | - Table 3.2 was updated accordingly and more detail on heritage assets added to each ODU section to enable a more robust assessment to be made. |
|           | 14             | <p>Comment on the SEA report:</p> <p><b>ODU 1</b> – As is recognised by the SEA Scoping report, Hengistbury Head is an archaeologically rich area yielding evidence of human occupation reaching back to the Palaeolithic period. Further information can be found in the Rapid Coastal Zone Assessment Survey (RCZA) for the South Coast of Dorset. Accordingly, a large area of the headland is designated as a scheduled monument and is also popular for recreation, nature conservation and education.</p> <p>Whilst Hengistbury Head is a scheduled monument and of national significance, we know that there have also been significant occupation sites found around the headland and whilst not protected by scheduling these are considered of national significance. This should therefore be reported in the SEA.</p> | - This information was added to section 6.3 as suggested.   |
|           | 15             | <p>Comment on the SEA report:</p> <p><b>ODU 1: Table 6.1</b> – Historic England’s ‘Curating the Palaeolithic’ guidance (2023) considers that ‘English Palaeolithic and Pleistocene remains are of both national and international significance’</p>   | - More detail was added to the historic environment baseline section under assessment findings.   |

| Consultee | Comment number | Summary of comments on the draft version of the SEA   | Action taken to finalise the SEA and Strategy  |
|-----------|----------------|---|--|
|           |                | <p>and that sites where diverse remains are preserved undisturbed or with minimal disturbance are of the greatest significance.</p> <p>Historic England's guidance sets out a framework within which to assess the potential significance of Palaeolithic and Pleistocene heritage assets.</p> <p>In relation to Table 6.1, we disagree with some of the assessment findings for this unit. We consider that all options would have adverse impacts on the historic environment as a result of physical impact by disturbance, compression or removal of archaeological deposits and also due to a change in the setting.</p> <p>The Leading Options report describes ODU1 as having higher topography than adjacent areas and providing a stabilising influence on the shape of Poole and Christchurch Bay by acting as an 'anchor point'. Through discussions with the project team, as well as the descriptions within the Poole and Christchurch Bays SMP2, we understand that the rapid loss of Hengistbury Head may have more far reaching consequences for heritage and communities in the longer term than is described in the SEA at present. If so then it would be helpful for the SEA to provide commentary on the implications of this for e.g. Christchurch town and harbour (and indeed Poole Bay), as this would form part of the justification for pursuing a Local Aspirational Option.</p> <p>The <b>National Economic Option: Do Minimum (Option 2)</b> is reported to have major, long-term significant negative effects on heritage due to loss of parts of Hengistbury Head. The potential loss of this resource is a key concern for Historic England.</p> <p>The <b>Local Aspirational Option: Managed Realignment (Option 4)</b> is also of some concern. This may represent a reasonable option for this unit, provided it would not result in rapid or large-scale losses of the archaeological resource. The SEA suggests that the erosion rate of the cliff would be controlled by maintenance/refurbishment of existing toe defences and ongoing beach recycling. While some erosion could sustain the geological interest of the cliff, areas of the scheduled monument could nevertheless be lost, and an overall uncertain impact on the historic environment is recorded against this option. We suggest that an overall adverse impact should be recorded, though a lesser impact than Option 2.</p> <p>Consequently, whichever option is taken forward, there is a high likelihood of loss of areas of archaeological interest at Hengistbury Head, and these losses would need to be monitored and mitigated, for example through a programme of recording.</p> | <ul style="list-style-type: none"> <li>- The historic environment scoring was reviewed and changed as suggested.</li> <li>- A paragraph was added for each option providing narrative on the historic environment impact and the justification for the scores.</li> <li>- Justification for pursuing the local option was also included.</li> <li>- The recommendations for monitoring and mitigation, through a programme of recording were also added to the SEA recommendations.</li> </ul> |
|           | 16             | <p>Comment on the SEA report:</p> <p><b>ODU 1: Cumulative effects</b> – We expect that the strategy for this unit will interact with the current application for replacement of the Long Groyne defence (BCP application 7-2023-15059-</p>  | <ul style="list-style-type: none"> <li>- Section 6.3.1 that discusses the cumulative impacts was expanded</li> </ul>   |

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|           |                | Y). Based on information in the Leading Options Report, we understand that improving this feature is likely to play a positive role in conserving heritage in the wider area, by stabilising Hengistbury Head and Christchurch and Poole Bays. It may however have a direct impact on archaeology. Any cumulative effects should be detailed in the SEA.   | upon to discuss the interaction with the long groyne.   |
| 17        |                | <p>Comment on the SEA report:</p> <p><b>ODU 2</b> – While Mundeford Sandbank does not contain any designated heritage assets, there are undesignated wreck sites and Grade II listed buildings within the wider area. Like Hengistbury Head, we understand the sandbank to be of strategic importance in terms of coastal processes and to provide shelter to Christchurch Harbour. For example, the Leading Options report states that: ‘if the Sandbank were to change orientation or rollback this could lead to step-changes or significantly more flood risk within the harbour itself as it could increase exposure to certain wave conditions or tidal currents’.</p> <p>We therefore broadly agree with the assessment that Do Nothing (Option 1) and Do Minimum (Option 2) could have significant adverse effects for heritage. However, if a breach of this feature could have adverse effects on the many designated heritage assets within Christchurch Harbour, then we do consider that it would be helpful for the SEA to include this within the commentary for those options so that severity of potential impact can be better understood.</p> <p>With this in mind, Historic England has significant concerns about the <b>National Economic Option: Do Minimum (Option 2)</b>.</p> <p>We consider the <b>Local Economic Option: Maintain with Adaptation</b> to be preferable.</p> <p>However, it is not clear at present why Options 3, 4, 5 and 6 would have a positive effect on heritage – would this effect in fact be neutral, or potentially uncertain/slight negative in the case of Managed Realignment? For example, could Managed Realignment impact on the scheduled monument at Hengistbury Head or on unknown archaeology within Christchurch Harbour?</p> | <ul style="list-style-type: none"> <li>- More detail was added to the historic environment baseline section under assessment findings.</li> <li>- The historic environment scoring was reviewed and updated (the Managed Realignment Option)</li> <li>- A paragraph was added for some of the options providing narrative on the historic environment impact and the justification for the scores.</li> <li>- A statement was included outlining that the delivery of the Local Aspirational Option would be preferable to the National Economic Option from a historic environment perspective.</li> </ul> |
| 18        |                | <p>Comment on the SEA report:</p> <p><b>ODU 2: Cumulative effects</b> – As with ODU 1, would the current application for proposed upgrade of the Long Groin have potential cumulative effects with the FCERM for ODU 2?</p>  | <ul style="list-style-type: none"> <li>- Section 7.3.1 that discusses the cumulative impacts was expanded upon to discuss the interaction with the long groyne.</li> </ul>  |
| 19        |                | <p>Comment on the SEA report:</p> <p><b>ODU 3</b> – ODU 3 includes a lengthy frontage where the scheduled monument at Hengistbury Head meets Christchurch Harbour. Cunliffe (1990) indicates that the north facing shore of Hengistbury was important as an Iron Age harbour<sup>5</sup>. We suggest that the SEA references this. It is suggested by the SEA that there may be some (though uncertain) erosion of this frontage, which includes part of a main access track to Hengistbury Head and Mundeford Spit. Were the</p>  | <ul style="list-style-type: none"> <li>- More detail was added to the historic environment baseline section under assessment findings.</li> <li>- More detail was also added to the leading options impact descriptions to explain the historic environment</li> </ul>  |

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|           |                | <p>track to be lost or realigned, this could result in physical losses to the monument and/or reduced public access and enjoyment of the monument. We consider that these potential impacts should be expressed more clearly in the commentary for each option. Conversely, physical works such as the proposed slope armour could themselves impact on archaeology, as well as the setting of the ancient monument.</p> <p>While these observations do not necessarily contradict the findings of the SEA of 'uncertain' heritage impacts across all options, it is important that the reason for these findings is detailed in the assessment commentary.</p> <p>We therefore consider that further information is required to inform and justify the Leading Option selection for ODU 3 from a heritage perspective, of <b>Local Aspirational Option: Adaptation/Resilience C (Option 7)</b> and <b>National Economic Option: Adaptation/Resilience A</b>.</p>  | <p>impacts and suggest potential mitigation.</p>   |
|           | 20             | <p>Comment on the SEA report:</p> <p><b>ODU 4</b> – ODU 4 runs along the edge of Wick Village Conservation Area, which itself includes a number of listed buildings and a scheduled monument (bowl barrow). The listed buildings to the east of the area are particularly close to the water and in areas of flood risk that benefit from existing defences in the form of a raised earth embankment through the parkland. We suggest that the conservation area designation, which includes a large area of verdant riverside parkland, should be noted in the SEA.</p> <p>The <b>National Economic Option: Sustain C</b> is potentially of concern as an area of existing sheet pile defences would be allowed to fail and this may have negative effects on the historic environment. As maps of future flood events are not included in the SEA, it would be helpful for the commentaries relating to each option to describe the specific implications for heritage (e.g. number of listed buildings impacted and implications for conservation area setting).</p> <p>For this reason, we consider that the <b>Local Aspirational Option: Sustain B</b> is preferable from a heritage perspective. This would see the existing sheet pile defence refurbished. In relation to both the sheet pile walls and the raising and (according to mapping in the Leading Options Report) very significant lengthening of the existing set bank embankment, while these interventions are desirable in that they would protect listed buildings from future flooding, it will be important that the design and construction of these defences are sensitive to the character/settings of the listed buildings and conservation area. There have also been a number of significant artefacts found in the vicinity showing high archaeological potential.</p> | <p>- More detail was added to the historic environment baseline section under assessment findings.</p> <p>- More detail was also added to the leading option impact descriptions to explain the historic environment impacts and suggest potential mitigation.</p> |

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|           | 21             | <p>Comment on the SEA report:</p> <p><b>ODU 4: Cumulative effects</b> – No cumulative effects are noted by the SEA. Consideration should be given to whether the strategy for SMZ 2 – ODU 4 will have cumulative effects with the Lower Stour Flood Risk Management Strategy that is currently being prepared by the Environment Agency.</p>   | <p>- Cumulative impacts with the Lower Stour Flood Risk Management Strategy were considered and added to the report. These are expected to be minimal.</p>  |
|           | 22             | <p>Comment on the SEA report:</p> <p><b>ODU 5</b> – As noted by the SEA, the main heritage interest in this area is at its eastern extent, where Quomps recreation ground falls within Christchurch Central Conservation Area (we suggest the SEA notes the conservation area designation) and contains several listed buildings as well as bordering the large and highly significant scheduled monument associated with Christchurch Priory and Castle.</p> <p>On the basis of the option commentaries and information in the Leading Option report, it is not currently clear how any of the proposals would necessarily benefit the historic environment. For example, the grade II listed band stand would remain in the flood plain in options involving only a setback defence. At present the setback defence also does not appear to extend in front of the scheduled monument or grade II* listed Place Mill. Nor is it clear whether it would be necessary or desirable for it to do so.</p> <p>The latter building – as a mill – has a functional relationship with the water. Consequently it is unclear whether a raised frontline defence (as in Option 5: Sustain B and Option 8: Improve B) can, or should, defend this building in its entirety. It is conceivable that a frontline defence could be built to abut the mill while leaving the mill wheel on the wet side. However, a defence itself may have impacts on the historic significance, fabric and setting of the building which will need to be considered in selecting and designing an appropriate scheme. There is also potential for significant archaeology to be found within the area.</p> <p>Accordingly, there appear to be some uncertainties around the impacts of either an enhanced frontline or setback defence at this stage. We therefore suggest that the findings in relation to heritage impacts in Table 10.1 are revisited, in particular we question whether any options are likely to have ‘major’ negative or positive effects on heritage.</p> <p>Notwithstanding this, we agree that the best approach for heritage is likely to be found amongst (or as a hybrid of) the selected leading options: <b>National Economic Option: Improve D-F</b> or <b>Local Aspirational Option: Improve A-C</b>.</p> | <p>- More detail was added to the historic environment baseline section under assessment findings.</p> <p>- The historic environment scoring was reviewed and changed as suggested.</p> <p>- Further narrative was also provided on the historic environment impact and the justification for the scores, as well as more details on appropriate mitigation such as ensuring any construction is in keeping with the character and setting of the conservation area and listed buildings.</p> |
|           | 23             | <p>Comment on the SEA report:</p> <p><b>ODU5: Cumulative effects</b> – No cumulative effects are noted by the SEA. Consideration should be given to whether the strategy for SMZ 2 – ODU 5 will have cumulative effects with the Lower</p>   | <p>- Cumulative impacts with the Lower Stour Flood Risk Management Strategy were considered and added</p>   |

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|           |                | Stour Flood Risk Management Strategy that is currently being prepared by the Environment Agency.   | to the report. These are expected to be minimal.   |
|           | 24             | <p>Comment on the SEA report:</p> <p><b>ODU 6</b> – At the heart of Christchurch, the scheduled monument known as the Pre-Conquest monastery, early Christian cemetery, Augustinian priory and a motte and bailey castle at Christchurch is a central component of the historic significance and the cultural and leisure offer of the town. A Millstream runs along the eastern edge of this complex, broadly parallel to the River Avon, and is described by the Leading Options Report as a source of potential flood risk. It is therefore disappointing that no strategic options have been considered that would provide a flood defence to the Priory precinct. The potential for much more regular flooding under future climate change scenarios, particularly in the northeast part of the scheduled monument around the Grade I listed Constable’s House, the Priory gardens and several other historic walls and features, could result in major adverse effects on heritage. The Constable’s House in particular is situated in a depression behind the Millstream wall, so it is conceivable that this could hold water for some time.</p> <p>Historic England therefore considers that the assessment findings for all options in Table 11.1 need more thorough consideration given the national significance of Christchurch Priory and the potential to impact on numerous heritage assets. We suggest that the SEA findings of positive effects on heritage (in some cases major positive effects) against Options 4-9 are reconsidered to ensure that they account for negative as well as positive impacts. It would be helpful if these impacts were described within the commentaries for each option. Please also see our comments on SMZ 2 – ODU 5 in relation to Place Mill.</p> <p>The <b>National Economic Option: Adaptation / Resilience</b> has been selected, with no <b>Local Aspirational Option</b> selected to provide better protection to the town, taking account of local circumstances. At present we object to the Leading Option as we consider that further work is required to inform and justify the final strategy for ODU 6. We suggest that additional strategic options that could defend the Priory complex and associated recreational areas are devised, assessed and consulted on. This should preferably be in collaboration with the team responsible for devising and assessing options for the Lower River Avon Strategy, as there is likely to be an interaction with this unit.</p> <p>For example, would it be feasible for a flood gate or lock to be placed towards the northern and southern extents of the Millstream, effectively taking this feature ‘offline’ in times of flood? If this were possible, then could a low level raised defence be located on the western side of the River Avon (for example on the eastern side of the Millstream path on the section adjacent to the Constable’s House, and then around the outer edge of residential areas to the south)?</p> | <p>- This comment was discussed with Historic England in a follow up call. We discussed economic limitations of options that involve constructing new defences to flood risk in this area. However, it was agreed to change the description of the Adaptation / Resilience option to include provision for undertaking property level resilience measures to the heritage features where viable. These measures would need to be appropriate for the heritage features and may therefore need to be bespoke solutions taking into account the structure characteristics, setting and building fabric. The Strategy reporting was therefore updated accordingly.</p> <p>- In addition, the scoring for the options in this unit was also updated and more detail was added to the scoring rationale with regards to the historic environment.</p> |

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|           |                | <p>For any option involving defences or adaptations to the Priory complex and scheduled monument (including the Millstream itself), a careful balance would need to be found between protection of these heritage assets, and any adverse impacts arising from works to their fabric or within their setting. Consequently, having regard to HEAN8, we believe that all options for this unit should be subject to a Heritage Impact Assessment that is proportionate to the significance of the assets affected and the frequency/severity of potential adverse effects. We would want any assessment to consider the impact on below ground remains from periods of wetting and drying, or to a wetter environment on the below ground archaeology, as well as prolonged periods of wetting and drying on highly graded buildings such as the Constable's House.</p> <p>If Adaptation/Resilience continues to be the Leading Option, then further work is required to understand whether the scheduled monument and listed buildings in this area are resilient to flooding and, if not, what scope there is to adapt them to make them more resilient in future.</p> |  |
|           | 25             | <p>Comment on the SEA report:</p> <p>ODU 6: Cumulative effects – No cumulative effects are noted by the SEA. However, we assume that the strategy for SMZ 2 – ODU 6 will have cumulative effects with the Lower River Avon Strategy that is mentioned in the Leading Options Report. In addition to this, we would welcome assessment of whether raising of defences at Rossiters Quay (ODU7) on the opposite bank of the river will have implications for flood risk in ODU6 that should be discussed in the SEA.</p>  | <p>- Cumulative impacts were considered in more detail and the report was updated. Cumulative impacts with the Lower River Avon were considered to be minimal. Cumulative impacts with ODU 7 would need to be investigated during scheme level appraisal.</p>  |
|           | 26             | <p>Comment on the SEA report:</p> <p><b>ODU 7</b> – The street frontage along Bridge Street boasts numerous listed buildings and the ODU in its entirety is located within Christchurch Central Conservation Area (we suggest that the conservation area designation is referenced in the SEA).</p> <p>Historic England considers that the National Economic Option: Improve A represents a reasonable strategy for this unit. However, consideration should be given to the implications of raised defences on Rossiters Quay for heritage assets in ODU6 including those associated with the Christchurch Priory (scheduled monument and several listed buildings).</p> <p>The design of any raised defence should seek to conserve the character of the conservation area and the settings of listed buildings, taking particular care at interfaces with any designated heritage assets including the Grade I listed Town Bridge and Waterloo Bridge.</p>   | <p>- Additional information was added to the report to expand on the historic environment baseline conditions.</p> <p>- Further narrative was also added around the scoring of the historic environment category.</p> <p>- In addition more details were added about potential mitigation through design, such as the importance of conserving the character of the conservation area.</p> |

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|           | 27             | <p>Comment on the SEA report:</p> <p><b>ODU 8</b> – Historic England has no comments on ODU 8 for which we understand detailed assessment will be carried out by the Lower River Avon Strategy.</p>  | <p>- No changes to the Strategy reporting in relation to this comment.</p>   |
|           | 28             | <p>Comment on the SEA report:</p> <p><b>ODU 9</b> – ODU 9 includes a number of listed buildings on bridge street, and this part of the ODU is also located within Christchurch Central Conservation Area, which should therefore be referenced in the SEA.</p> <p>In addition to this, the presence of a Mesolithic occupation site at Mother Siller’s Channel on Stanpit Marsh raises the possibility of other prehistoric and later sites (as noted in the SEA scoping). Whilst not protected by scheduling these are considered of national significance. Consequently it should be recognised in the SEA that the construction of new defences may have adverse impacts on the historic environment. Historic England’s ‘Curating the Palaeolithic’ guidance (2023) considers that ‘English Palaeolithic and Pleistocene remains are of both national and international significance’ and that sites where diverse remains are preserved undisturbed or with minimal disturbance are of the greatest significance. Historic England’s guidance sets out a framework within which to assess the potential significance of Palaeolithic and Pleistocene heritage assets.</p> <p>Historic England would welcome further clarity on the nature of the proposals to ensure that the <b>National Economic Option: Sustain A</b> is justified in relation to heritage and that its impacts are understood. The design of any raised defence in close proximity to Bridge Street should seek to conserve the character of the conservation area and the settings of listed buildings, taking particular care at the interface with Grade I listed Waterloo Bridge.</p> | <p>- Additional information was added to the report to expand on the historic environment baseline conditions.</p> <p>- Further narrative was also added around the scoring of the historic environment category.</p> <p>- Further narrative was also added in reference to Bridge Street as suggested by the comment.</p> |
|           | 29             | <p>Comment on the SEA report:</p> <p><b>ODU 9: Cumulative effects</b> – No cumulative effects are identified by the SEA. However, we suggest that the interaction with the Lower River Avon Strategy should be identified and assessed.</p>  | <p>- Cumulative impacts were considered in more detail and the report was updated. Cumulative impacts with the Lower River Avon were considered to be minimal.</p>   |
|           | 30             | <p>Comment on the SEA report:</p> <p><b>ODU 10</b> – The western part of ODU10 follows the frontage of Stanpit and Fishermans Bank Conservation Area, while the eastern part is within Mundeford Quay Conservation Area. We suggest that the SEA makes reference to this, along with the listed buildings already identified.</p> <p>Historic England considers that the <b>National Economic Option: Improve A</b> is likely to represent a reasonable strategy for this unit. The design of any raised defence should seek to conserve the character of the conservation areas and the settings of listed buildings.</p>   | <p>- Additional information was added to the report to expand on the historic environment baseline conditions.</p> <p>- As suggested, further information also added outlining how the design of any raised defences should seek</p>   |

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|           |                | There have also been a number of significant artefacts found within the vicinity showing the high archaeological potential of the area.   | to conserve the character of the conservation area.   |
|           | 31             | <p>Comment on the SEA report:</p> <p><b>ODU 11</b> – The ODU 11 frontage is within Mudeford Quay Conservation Area and contains a single Grade II listed building close to the southern tip of the quay and ferry terminal.</p> <p>Nevertheless, the <b>National Economic Option: Do Minimum (Option 2)</b> is of significant concern to Historic England due to the risks associated with Options 1 and 2 of large-scale morphological changes in the area, which could increase flood risk in Christchurch Harbour in an important area of built and cultural heritage.</p> <p>The <b>Local Aspirational Option: Adaptation/Resilience (Option 8)</b>, which allows for maintenance of the quay walls and property level protection for properties at risk of flooding, is preferable in relation to the historic environment. However, we would welcome further clarity within the SEA of the extent to which this is likely to avert the issues associated with large-scale morphological change.</p> | <p>- The description of impacts for the Local Aspirational Option was updated to explain that this option would not lead to large scale morphological changes. Concern noted regarding the National Economic Option but reassurance provided that this option is not the aspiration and would not be delivered if funding for the Local Option is available.</p> <p>- In addition, further justification added to the report to explain historic environment scoring and outlining mitigation such as addressing flood risk to listed buildings with resilience measures.</p> |
|           | 32             | <p>Comment on the SEA report:</p> <p><b>ODU 12</b> – Whilst there are, as noted, several listed buildings close to ODU 12 including Highcliffe Castle, there have also been a number of significant artefacts found within the vicinity showing the high archaeological potential of the area. We also note the remains of a Second World War pillbox close to the cliff.</p> <p>We broadly agree with the assessment findings, however doing nothing or minimal intervention would not necessarily be harmful in relation to heritage.</p> <p>We consider that the <b>National Economic Option: Improve A (Option 4)</b> represents a reasonable strategy for the ODU. The <b>Local Aspirational Option: Improve C (Option 6)</b> would have the additional benefit of providing public realm improvements.</p>  | <p>- Additional information was added to the report to expand on the historic environment baseline conditions.</p> <p>- Further justification for historic environment scoring for the options, including the Do Nothing / Do Minimum options, was added to the report.</p>   |
|           | 33             | <p>Comment on the SEA report:</p> <p><b>ODU 13</b> – Within ODU 13, Highcliffe Castle is a Grade I listed building within landscaped grounds that extend towards Highcliffe Beach. The frontage also forms part of the Highcliffe to Milford Cliffs designated SSSI, providing access to the fossil rich Barton Beds and Headon Beds.</p>   | <p>- Where appropriate, further justification for the historic environment scoring for the options was added to the report.</p>   |

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|           |                | <p>Having regard to the highly significant Highcliffe Castle and its setting, Historic England considers that the <b>National Economic Option / Backup Option: Improve C (Option 6)</b> represents a reasonable strategy for the ODU.</p> <p>The <b>Local Aspirational Option: Improve A (Option 4)</b> may have additional heritage benefits as this would bring forward beach nourishment earlier in the strategy period (see cumulative impacts below).</p>  |  |
|           | 34             | <p>Comment on the SEA report:</p> <p><b>ODU 13: Cumulative effects</b> – Would beach nourishment be beneficial to sediment supply elsewhere in the strategy area and/or to Hurst Spit/Hurst Castle to the east? Could there therefore be cumulative effects with the Hurst Spit to Lymington Strategy that should be assessed in the SEA?</p>   | <p>- A discussion of how there could be positive cumulative effects on the management of Hurst Spit was added to the report.</p>   |
|           | 35             | <p>Comment on the SEA report:</p> <p><b>ODU 14</b> – The ODU 14 frontage forms part of the Highcliffe to Milford Cliffs designated SSSI, providing access to the fossil rich Barton Beds and Headon Beds. There have been a number of significant artefacts found within the vicinity showing the high archaeological potential of the area. A number of structures relating to the Second world war have been recorded within the vicinity and we would expect a desk based assessment to further consider the impact of detailed proposals on these structures.</p> <p>In terms of the SEA assessment table (19.1) – it is not clear how the assessment of major significant positive and negative effects for certain options has been reached as the ODU contains little in terms of designated heritage assets. We do not necessarily agree with the assessment that doing nothing would be harmful from a heritage perspective. Further commentary on any heritage impacts anticipated would therefore be welcome along with revised assessment scores.</p> <p>Nevertheless, from a heritage perspective Historic England considers the <b>National Economic Option: Managed Realignment B (Option 7)</b> and the <b>Local Aspirational Option: Managed Realignment A (Option 6)</b> to represent a reasonable strategy for this ODU.</p> | <p>- Additional information was added to the report to expand on the historic environment baseline conditions.</p> <p>- The option scores for the historic environment category were reviewed and updated to reflect uncertain impacts.</p> <p>- Justification for the updated scoring was then provided at the end of section 19.3.</p> |
|           | 36             | <p>Comment on the SEA report:</p> <p><b>ODU 15</b> – ODU 15 falls within the Highcliffe to Milford Cliffs SSSI and Hordle Cliff is a rich source of fossil remains. There are no designated heritage assets close to the shoreline. However there have been a number of significant artefacts found within the vicinity showing the high archaeological potential of the area. We would therefore need to be consulted further as proposals came forward.</p>   | <p>- Additional information was added to the report to expand on the historic environment baseline conditions.</p> <p>- The option scores for the historic environment category were reviewed and updated to reflect uncertain impacts.</p>  |

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|           |                | We broadly agree with the assessment findings and consider the <b>National Economic Option: Do Nothing (Option 1)</b> to represent a reasonable strategy for this ODU.   | - Text was included in the report to specify that Historic England should be consulted with as this option progresses.  |
|           | 37             | <p>Comment on the SEA report:</p> <p><b>ODU 16</b> – ODU 16 falls within the Highcliffe to Milford Cliffs SSSI. There are no designated heritage assets close to the shoreline, though there may be non-designated archaeological remains. A number of structures relating to the Second world war have been recorded within the vicinity and we would expect a desk-based assessment to further consider the impact to these structures as proposals come forward.</p> <p>In terms of the SEA assessment table (21.1) – it is not clear how the assessment of positive and negative effects for the options has been reached as the ODU contains little in terms of designated heritage assets. Further commentary on this would be welcome along with revised assessment scores if appropriate.</p> <p>Nevertheless, Historic England considers the <b>National Economic Option: Managed Realignment C (Option 7)</b> and the <b>Local Aspirational Option: Managed Realignment A or B (Options 5 or 6)</b> to represent a reasonable strategy for this ODU. If the beach nourishment referred to is expected to have a positive effect on Hurst Spit through sediment supply and longshore drift, then it would be helpful for the SEA to highlight this.</p> | <p>- Additional information was added to the report to expand on the historic environment baseline conditions.</p> <p>- The option scores for the historic environment category were reviewed and updated to reflect uncertain impacts and justification for the scoring was provided at the end of section 21.3.</p> |
|           | 38             | <p>Comment on the SEA report:</p> <p><b>ODU 16: Cumulative effects</b> – The consultation Information Document states that: “The leading options for ODUs 16-18 will ensure that the options for managing Hurst Spit can also be undertaken (and vice versa).”</p> <p>Does the proposed beach nourishment in ODU 16 have any implications for Hurst Spit to the east of the strategy area, and therefore cumulative effects with the Hurst Spit to Lymington Strategy that should be assessed in the SEA?</p>  | <p>- A discussion of how there could be positive cumulative effects on the management of Hurst Spit was added to the report.</p>  |
|           | 39             | <p>Comment on the SEA report:</p> <p><b>ODU 17</b> – Part of ODU 17 is located within the Highcliffe to Milford Cliffs SSSI, and there is a single Grade II listed building The White House immediately adjacent to the shoreline. Structures relating to the Second world war have been recorded in the vicinity and we would expect a desk-based assessment to further consider the impact of detailed proposals on these structures.</p> <p>We broadly agree with the assessment findings and consider that the <b>National Economic Option: Improve C (Option 6)</b> and the <b>Local Aspirational Option: Improve A/B (Options 4 and 5)</b> represent a reasonable strategy for this ODU. However, it is again unclear how the</p>  | <p>- Additional information was added to the report to expand on the historic environment baseline conditions.</p> <p>- Minor revisions to the historic environment scoring was undertaken and additional justification was added to the report for the scores.</p>   |

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|           |                | heritage assessment findings in Table 22.1 have been reached and we would therefore welcome more commentary on this and, if necessary revised assessment scores.   | - Some recommendations for scheme level appraisal also added to the report, such as ensuring the rock revetment design accounts for the setting of the White House grade II listed building.   |
|           | 40             | <p>Comment on the SEA report:</p> <p><b>ODU 17: Cumulative effects</b> – The consultation Information Document states that: “The leading options for ODUs 16-18 will ensure that the options for managing Hurst Spit can also be undertaken (and vice versa).”</p> <p>Does the strategy for ODU 17 have any implications for Hurst Spit to the east of the strategy area, and therefore cumulative effects with the Hurst Spit to Lymington Strategy that should be assessed in the SEA?</p>   | - The cumulative effects section was updated to provide additional clarity.  |
|           | 41             | <p>Comment on the SEA report:</p> <p><b>ODU 18</b> – The SEA records this strategy unit as relatively unconstrained in relation to designated heritage assets. However, structures relating to the Second world war have been recorded in the vicinity and we would expect a desk-based assessment to further consider the impact of detailed proposals on these structures.</p> <p>Furthermore, as the ODU 18 strategy frontage is immediately adjacent to Hurst Spit (whose heritage interest is discussed in in the introduction to this response), it seems likely that the chosen strategy for this unit could have implications for the spit and heritage assets located on it. The historic significance of assets on the spit, and potential impacts of the strategy on them (including impacts on public access and enjoyment), should therefore be reflected in the SEA. The SEA assessment table (5.18) should also be reviewed, having regard to the positive/negative impacts on Hurst Spit of options involving erosion of the frontage, options involving defence of the frontage, and options involving beach nourishment.</p> <p>The <b>National Economic Option: Improve B (Option 5)</b> involves improvement to defences and beach nourishment in epoch 2. The <b>Local Aspirational Option: Improve A (Option 4)</b> would involve beach nourishment in the first part of epoch 1. Bearing in mind the urgency of erosion issues on Hurst Spit (with potential for major impacts on the heritage assets located there), if sediment supply through beach nourishment at Milford on Sea would alleviate this issue then Historic England would favour earlier intervention (Option 4). However, we do not yet have adequate information on the nature of this relationship as it is not currently detailed in the SEA.</p> | <p>- Additional information was added to the report to expand on the historic environment baseline conditions.</p> <p>- Due to the proximity to Hurst Spit there is uncertainty of the impacts and therefore the historic environment scoring was reviewed and updated accordingly. Further engagement with Historic England is recommended during scheme development as the options are progressed.</p> |

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|           |                | Further detailed assessment and consultation with Historic England on strategy options for ODU 18 would therefore be welcome.   |   |
|           | 42             | <p>Comment on the SEA report:</p> <p><b>ODU 18: Cumulative effects</b> – We expect the strategy for ODU 18 to have strong functional relationship with coastal processes on adjacent Hurst Spit. The cumulative effects of the strategy with the Hurst Spit to Lyminster Strategy should therefore be assessed in the SEA.</p>  | <p>- The cumulative effects section was updated and a more thorough discussion of the impact on Hurst Spit was included. This includes information on the sediment transport with options that include beach nourishment potentially providing a positive impact on the Spit.</p>   |
|           | 43             | <p>Comment on the SEA report:</p> <p><b>Monitoring</b> – We suggest that the SEA needs to be more specific about monitoring proposals. While an Authority’s Monitoring Report / Annual Monitoring Report prepared by planning policy teams will sometimes <i>report on</i> matters other than Local Plan policies, in our experience it would be unusual for a policy team to actively monitor flooding and coastal change. Monitoring arrangements are also likely to change under proposed planning reforms being brought forward under the Levelling Up and Regeneration Bill. We therefore suggest that further consideration is given to this section in consultation with relevant teams at BCP, including the Heritage/Conservation team for strategy units where heritage assets may need to be monitored.</p>  | <p>- Section 24.2 of the SEA was updated to suggest more specific monitoring actions that could be undertaken. This included adding table 24-1 to the report which set out monitoring relating to the historic environment, marine environment, biodiversity and intertidal habitats, geodiversity and historic landfill sites.</p>                       |
|           | 44             | <p>Comment on the SEA report:</p> <p><b>Mitigation</b> – Schedule 2, part 7 of the SEA Regulations indicates that Environmental Reports should contain: ‘The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme’.</p> <p>We would therefore expect to see proposed mitigation measures in this SEA in relation to potential impacts on heritage assets. We are particularly keen that the Council gives early consideration to potentially significant adverse impacts at Hengistbury Head and Christchurch Priory/Constable’s House.</p> <p>Where development is proposed, both the NPPF (paragraph 205) and the Marine Policy Statement (2.6.6.3 and 2.6.6.9) promote and require mitigating actions to record and advance understanding of the significance of heritage assets before any losses to their significance occur.</p> <p>An FCERM decision to allow managed realignment through ‘natural’ processes (e.g. at Hengistbury Head) is nevertheless a management decision, and the need for archaeological assessment and mitigation in advance of losses remains. Elsewhere, if erosion is ongoing and</p> | <p>- To address this comment mitigation recommendations were added throughout the report and included in the ODU sections.</p> <p>- The recommended Mitigation for the leading options in ODU 1 (Hengistbury Head) and ODU 6 (covering Christchurch Priory / Constables House) was also added to the Monitoring section (section 24.2) of the report.</p> |

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|                 |                | <p>no active archaeological measures are proposed, it would be beneficial if the public are encouraged to report archaeological material that becomes exposed to archaeologists via their local Historic Environment Record or museum service / Finds Liaison Officer (or for Hengistbury, to staff at the visitor centre).</p> <p>As part of our Climate Change Strategy<sup>6</sup>, Historic England also plans to develop a toolkit by 2025 that equips those who care for our heritage to plan for and manage decisions where some loss of, or transformative change to, heritage assets is unavoidable.</p> |   |
| Natural England | 45             | <p>Comment on the SEA report:</p> <p><b>ODU 2/11</b> – The strategic options are not wholly clear, it appears to Natural England that the current deeper channels within the harbour are not being managed in a manner which maximises options to encourage soft coastal defences within the harbour. The options 5 and 6 should be reviewed. It should not be assumed that changes due to natural processes which modify the extent of biodiversity features are necessarily negative. Natural England would support the National Leading Option allowing natural processes.</p>                                 | <ul style="list-style-type: none"> <li>- Further narrative was included in the report to explain the strategic options, particularly around the rollback process of the Sandbank.</li> <li>- With respect to the management of the channels within the Harbour and soft engineering approaches, the primary risk is from tidal still water level flooding / storm surges and the position of the channels would do little to impact this risk. However, it is recognised that wave overtopping is also a risk and channel position could influence natural habitats like saltmarsh which may attenuate waves. Some of the leading options in the harbour (e.g. ODU 9) include a provision to explore saltmarsh restoration opportunities during scheme appraisal and this could involve improved channel management.</li> </ul> |
|                 | 46             | <p>Comment on the SEA report:</p> <p><b>ODU 3</b> – Natural England would concur with the National Leading Option but not a negative impact on biodiversity.</p>  | <ul style="list-style-type: none"> <li>- Further justification for the negative impact on biodiversity was added to the report. The National Option could lead to some erosion of land based designations, such as Dorset</li> </ul>  |

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|           |                |   | Heathlands SPA / Dorset Heaths SPA.  |
|           | 47             | <p>Comment on the SEA report:</p> <p><b>ODU 6</b> – Where the adjacent land is not residential a broader approach to adaptation/resilience should be pursued to allow for natural flood management.</p>   | <p>- The leading option (Adaptation / Resilience) was updated to include a provision for natural flood management where adjacent land is not residential.</p>  |
|           | 48             | <p>Comment on the SEA report:</p> <p><b>ODU11</b> – National Leading Option is considered appropriate but it is likely that this would result in biodiversity gains.</p>  | <p>- Given the uncertainty around the morphological changes this option could lead to then no changes to the biodiversity scoring were made.</p>   |
|           | 49             | <p>Comment on the SEA report:</p> <p><b>ODU12</b> – Eastwards. Natural England advise that the effect of groynes on beach sediment transportation is an important aspect of sustainable coastal defences. It would be prudent to investigate more fully a better adjustment of heights and lengths along the coast to maintain minimum sustainable beach levels whilst allowing west east sediment flows to defend the coast.</p> | <p>- Further description was added to the Improve options in ODU 12 to confirm that this is the intent of the options and the design of groynes will need to be based on this at the scheme stage.</p>   |
|           | 50             | <p>Comment on the SEA report:</p> <p>ODUs which include Highcliffe to Milford Cliff SSSI should consider maintaining sufficient natural erosion processes such that the geological features remain available. If over stabilised/drained negative geological and biodiversity impacts would occur.</p>  | <p>- For options that seek to control erosion processes (namely in ODUs 1, 13, 14, 16 and 18), in the report further clarity was added to the option descriptions that these options are unlikely to stop erosion entirely – some erosion will still occur so that geological features can continue to be exposed.</p> |
|           | 51             | <p>Comment on the SEA report:</p> <p>This section of coast contains a number of internationally and nationally important nature conservation sites and features. The coastal processes are complex and it may be of assistance to the authorities to engage in discussions directly to refine options and determine the significance of effects given different approaches. This would necessarily entail discussion about</p>    | <p>- Adaptive pathways have been included in the Strategy (i.e. a flexible approach). A pointer was added to Chapter 5 of the report that options will be refined in the future at scheme level, as the selected pathway is followed.</p>  |

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|             |                | the need for a flexible approach to coastal management against a background of sea rise predictions.  |  |
| BCP Council | 52             | Comment on SEA report:<br>ODU 1 - Natterjack toad has been recorded in this area, not often but that might change. If more frequent in area, as a European Protected Species that may have an impact on option 1 and 2 being minor negative?  | - A reference to the Natterjack Toad in ODU 1 was added to the report in the baseline description for this unit.<br>- No change to scoring for this option as impact to species already considered in scoring. |
|             | 53             | Comment on SEA report:<br>ODU 2 - In text while there is mention of SSSI and SAC no mention of Mundeford Spit SNCI. The end of Spit is the only location that ringed plover currently breeds within BCP and probably only site for breeding oystercatcher. The north end of spit an important high tide roost for birds of the Harbour. Area also includes Sea Knotgrass and other vegetated shingle plant species. One record of Natterjack toad few years ago, old records from 1980s from Holoway Dock area. | - References to the SNCI, ringed plover, breeding oystercatcher, sea knotgrass and other vegetated shingle plant species were added to the report in the baseline description for this unit.                   |
|             | 54             | Comment on SEA report:<br>While there has been regular surveys for toads there is scope for higher effort so cannot rule out under recording of this species in ODU 1 and ODU 2   | - Noted. No amendments to the Strategy reporting. Scheme development will need to consider undertaking ecological surveys to support baseline development and design mitigation.                               |
|             | 55             | Comment on SEA report:<br>While currently the areas of sand dunes are small they are listed as listed as irreplaceable habitats under NPPF 2021   | - No amendments to the Strategy reporting. Opportunities for sand dune creation / restoration are included as part of options 3-6 in ODU 2.  |
|             | 56             | Comment on SEA report:<br>ODU 11 In text while there is mention of SSSI and SPA but no mention of Mundeford Quay SNCI   | - Referred to in Table 3-2 of the SEA scoping report. No change to reporting.  |
|             | 57             | Comment on SEA report:<br>For some of the Christchurch Harbour sections and river sections otters and water vole may be present which may impact assessment of biodiversity impacts, at present these species are just passing through, rather than breeding in area.   | - Noted. No amendments to Strategy reporting. Scheme development will need to consider these specific species when undertaking design / developing the construction  |

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|                       |                |  | methodology and include appropriate mitigation.   |
|                       | 58             | Comment on SEA scoping report:<br>SSSI and SPA etc are shown on a map why not SNCI/SINC?   | - Figure 3-1 in the scoping report is showing international and national designations. No amendments made   |
| Dorset Wildlife Trust | 59             | <p>Comment on SEA report:</p> <p>I would make the general observation that data on marine habitats and species in the marine environment along the open coast in Christchurch Bay is very sparse and is almost non-existent for the beaches under the cliffs (at least in terms of data held by Dorset Environmental Records Centre – should BCP be holding ecological data, we would encourage sharing it with DERC). This lack of data will obviously affect the ability to assess the impact on marine biodiversity of many of the suggested options.</p> <p>There is a significant amount of beach recharging suggested along the open coast, over a long time period. This will particularly impact the macro-invertebrate fauna of the beaches and the effects will extend out to the nearshore waters, depending on the methods used. It would therefore be useful to develop a monitoring programme to understand the impacts on the biodiversity of the affected beaches and nearshore waters and how recovery rates compare to the frequency of planned nourishments. The sourcing of the sediment used for beach nourishment will also have an ecological impact – this should be accounted for when working out the overall impact of the interventions.</p> | <p>- Scheme development will need to consider whether ecology surveys are required to make a more informed assessment of marine habitat impacts and to incorporate appropriate mitigation.</p> <p>- As suggested, the SEA was updated to recommend a monitoring programme to understand impacts of beach nourishment on biodiversity on the beaches and nearshore waters in relation to planned nourishments. This recommendation was added to table 24-1.</p> <p>- At the scheme level, mitigation for beach nourishment will involve ensuring that nourishment material has similar sediment characteristics / grain size to existing beaches and that it comes from licensed dredge areas.</p> |
|                       | 60             | <p>Comment on the SEA scoping report:</p> <p>The report includes “the seabed is composed of sandy sediment, which supports a variety of organisms including the dominant slipper limpet (<i>Crepidula fornicata</i>) and red macroalgae which are non-native species, burrowing polychaete worms and molluscs.” This creates a slightly misleading picture of the quality of the marine environment in Christchurch Bay.</p> <p><i>Crepidula</i> may be locally dominant in places, but unlikely to be across the Bay and “red macroalgae” covers a large number of species, a small number of which will be non-</p>  | - The text in section 3.2.3 was updated to reflect the recommendations of this comment.   |

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|           | 61             | <p>native. Marine algae are not generally associated with sandy sediment, and would be restricted to the ledges and any patches of rough ground.</p> <p>Comment on the SEA scoping report:<br/>           There are some inaccuracies in the next paragraph:<br/> <i>Gammarus insensibilis</i> (note spelling) - the lagoon sandshrimp, is not Nationally Rare, but is listed on Schedule 5 section 9.4.a of the Wildlife and Countryside Act 1981<br/> <i>Alkmaria romijni</i> - the tentacled lagoon worm - is Nationally Scarce and listed on Schedule 5 section 9.4.a of the Wildlife and Countryside Act 1981<br/> <i>Epistomia bursaria</i> - a bryozoan - is listed as Marine – Nationally Rare.<br/>           There should be a comma after <i>Anguilla</i><br/> <i>Trapania pallida</i> - a sea-slug - is listed as Marine – Nationally Scarce<br/> <i>Stenosoma lancifer</i> – an isopod – is listed as Marine – Nationally Scarce</p> | - The text in section 3.2.3 was updated to reflect the recommendations of this comment.  |
| SIFCA     | 62             | <p>Comment on the SEA scoping report:<br/>           In the first paragraph it mentions Southern IFCA and our management of all activities through a system of byelaws. Whilst we do have byelaws for the area, we utilise a variety of management options and also management covers more than the implementation of closed seasons. Could I suggest an alternative wording of<br/> <i>'Commercial fishing takes place in Christchurch Harbour and along stretches of the bay. The Southern Inshore Fisheries and Conservation Authority (Southern IFCA) has jurisdiction over commercial and recreational fishing activity for sea fisheries resources within the Strategy area. Management of fishing is achieved through statutory and non-statutory measures, for statutory measures this includes seasons for certain gear types or species, catch restrictions and minimum conservation reference sizes'</i>.</p>                          | - The text in section 7.2.6 was updated as per the suggestion in this comment.   |
|           | 63             | <p>Whilst I agree that a lot of the catch landed to Mundeford is shellfish, there will also be fish species landing from net fishing activity both within Christchurch Harbour and in the bay. I would also remove 'oyster' as the nearby oyster fishery has been closed for a number of years now. Fish species will include grey mullet, bass and other pelagic and demersal species.</p>   | - The text in section 7.2.6. was updated to include reference to grey mullet, bass and other pelagic and demersal species.                   |
|           | 64             | <p>The fisheries referenced from the second sentence of paragraph 2 to the end of that paragraph, on sport fishing on the rivers, and eel fishing are not regulated by Southern IFCA, this is the Environment Agency so it might be good to separate out the fisheries that the Southern IFCA manages from those managed by the EA.</p>   | - The report was updated to include reference to the Environment Agency regulating sports and eel fishing on the River Avon and River Stour. |

| <b>Consultee</b> | <b>Comment number</b> | <b>Summary of comments on the draft version of the SEA</b>  | <b>Action taken to finalise the SEA and Strategy</b>  |
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|                  | 65                    | There will also be rod and line fishing in the Strategy area both commercial and recreational again targeting a range of species including pelagic and demersal fish species. | - The report was updated to include this information. |

**Table 3-2. Consultation responses and actions taken on other environmental deliverables**

| <b>Deliverable</b> | <b>Consultee</b> | <b>Comment number</b> | <b>Summary of comments</b>   | <b>Action taken to finalise the Strategy</b>   |
|--------------------|------------------|-----------------------|--|--|
| HRA screening      | Natural England  | 1                     | ODU 14/15/16 and part of 17: the full length of the frontage is also a SSSI for geological reasons, stabilisation, drainage and rock revetments are all damaging to the SSSI features.   | - Comment noted. No changes were made to HRA screening.  |
|                    |                  | 2                     | Dorset Heathlands (SAC/SPA):<br>A number of the features of the designated sites are not present in the co-located parts of the designated sites e.g. Great crested newts/southern damselfly, alkaline fens, calcareous fens and molinia meadows.  | - The HRA was updated with a sentence outlining that not all of the qualifying features outlined in Table 3-1 are present in the co-located parts of the European sites.   |
|                    |                  | 3                     | Dorset Heathlands (SAC/SPA):<br>It is difficult to see how turbidity would affect the features of the designated sites (SAC/SPA).  | - Changes in turbidity were previously screened in for ODUs 1 and 3 but following NE advice were screened out.   |
|                    |                  | 4                     | River Avon (SAC):<br>ODU 6, north of the bypass should be screened in for habitat loss, the common land north and south of the bypass need not be defended.  | - The screening decision for ODU 6 was reviewed and it was concluded that no change to the decision was required. This is because while the ODU 6 boundary extends north of the bypass to Knapp Mill, the Strategy is only considering options south of the bypass. There are no proposals to defend the common land south of the bypass. Table 3-11 was updated to explain this decision. |
|                    |                  | 5                     | River Avon (SAC):<br>ODUs should be screened in for turbidity and the pressure evaluated in relation to ODU 6, 7 and 9. Although turbidity might already be high, changes in the physical characteristics of the river can affect the migratory features of the site and so these should be looked into at a project level. No additional comments on the screening. | - The screening decision for ODUs 6, 7 and 9 for turbidity was reviewed. The decision was updated to screened in.  |

| <b>Deliverable</b> | <b>Consultee</b> | <b>Comment number</b> | <b>Summary of comments</b>  | <b>Action taken to finalise the Strategy</b>  |
|--------------------|------------------|-----------------------|---|---|
|                    |                  | 6                     | Avon Valley (SPA / Ramsar):<br>ODU 6, 7, 9 should be screened in for turbidity.   | - The screening decision for ODUs 6, 7 and 9 for turbidity was reviewed. The decision was updated to screened in.             |
|                    |                  | 7                     | Solent and Southampton Water (SPA):<br>Habitat loss should be screened in, and the pressure evaluated in relation to ODU 18 to ensure the SPA is not impacted if there is not sufficient space for construction.  | - The screening decision for ODU 18 for habitat loss was reviewed. The decision was updated to screened in.                   |
|                    |                  | 8                     | Solent and Southampton Water (SPA):<br>Changes in physical regime should be screened in and the pressure evaluated in relation to ODU 16, 17 and 18 to ensure works would not lead to changes in the physical regime of the habitat.  | - The screening decision for ODUs 16-18 for changes in physical regime was reviewed. The decision was updated to screened in. |
|                    |                  | 9                     | Solent and Southampton Water (SPA):<br>Physical damage should be screened in and the pressure evaluated in relation to ODU 18 to ensure construction does not cause physical damage to the SPA.   | - The screening decision for ODU 18 for physical damage was reviewed. The decision was updated to screened in.                |
|                    |                  | 10                    | Solent and Southampton Water (SPA):<br>Turbidity should be screened in, and the pressure evaluated in relation to ODU 16, 17 and 18 to evaluate if there will be any changes in suspended solids at a project level as tern species are very sensitive to increases in turbidity. Cook & Burton (2010) consider common tern to be highly vulnerable to changes in turbidity as vision plays an important role in the species' foraging capability. Little Tern and tern species is general are visually foraging birds, which depends on clear water to identify and catch potential prey. Therefore, they are sensitive to changes in turbidity (van Kruchten & van der Hammen 2011). Cook & Burton (2010) assess Sandwich Tern to be highly vulnerable to changes in turbidity as vision plays an important role in the species' foraging capability. | - The screening decision for ODUs 16-18 for turbidity was reviewed. The decision was updated to screened in.                  |
|                    |                  | 11                    | Solent and Southampton Water (SPA):<br>Disturbance should be screened in and the pressure evaluated in relation to ODU 16 and 17 to ensure disturbance is unlikely. All bird features present are sensitive to above water noise and visual disturbance.  | - The screening decision for ODUs 16-17 for disturbance was reviewed. The decision was updated to screened in.                |

| <b>Deliverable</b> | <b>Consultee</b> | <b>Comment number</b> | <b>Summary of comments</b>  | <b>Action taken to finalise the Strategy</b>   |
|--------------------|------------------|-----------------------|---|--|
|                    |                  | 12                    | Solent and Dorset Coast (SPA):<br>Changes in physical regime should be screened in and the pressure evaluated in relation to ODU 12-18. ODU 12, 13, 14, 16, 17 and 18 have the potential to change the physical regime of the shingle bars and beaches.   | - The screening decision for ODUs 12-14 and ODUs 16-18 for changes in physical regime was reviewed. The decision was updated to screened in.   |
|                    |                  | 13                    | Solent and Dorset Coast (SPA):<br>Turbidity should be screened in, and the pressure evaluated in relation to ODU 12, 13, 14, 16, 17 and 18 to evaluate if there will be any changes in suspended solids at a project level as tern species are very sensitive to increases in turbidity.  | - The screening decision for ODUs 12-14 and ODUs 16-18 for turbidity was reviewed. The decision was updated to screened in.  |
|                    |                  | 14                    | Solent and Dorset Coast (SPA):<br>Disturbance should be screened in, and the pressure evaluated in relation to all ODUs as tern species are vulnerable to above water noise and visual disturbance. Also, consider in combination effects of work at Hengistbury Head Long Groyne as disturbance from this work may amplify effects of changes in foraging patterns, sediment plumes etc reducing the features available habitat. Please consider the phasing of works. | - The screening decision for all ODUs for disturbance was reviewed. This decision was updated to screened in. The works to Hengistbury Head have already been undertaken and therefore before the works planned to deliver the Strategy. |
|                    |                  | 15                    | Solent Maritime (SAC):<br>Habitat loss, physical damage and turbidity should be screened in and the pressure evaluated in relation for ODU 18 due to the proximity of the works to the SAC and designated sensitive habitat. Smothering, siltation rate changes, changes in suspended solids, abrasion, and physical loss are all pressures which may affect the SAC habitats.  | - The screening decisions for ODU 18 for habitat loss, physical damage and turbidity were reviewed. The decision for habitat loss and physical damage was updated to screened in.  |
|                    |                  | 16                    | Solent Maritime (SAC):<br>Changes in physical regime should be screened in and the pressure evaluated in relation to ODU 16, 17 and 18 to ensure works would not lead to changes in the physical regime of the sensitive habitat. Saline lagoons, Atlantic salt meadows and other designated sediment types are sensitive to changes in accretion/siltation as well as erosion/scour which construction of structures in the local area may cause.                      | - The screening decision for ODUs 16-18 for changes to physical regime was reviewed. The decision was updated to screened in.  |

| Deliverable    | Consultee          | Comment number | Summary of comments  | Action taken to finalise the Strategy   |
|----------------|--------------------|----------------|--|---|
|                |                    | 17             | <p>Solent Maritime (SAC):</p> <p>Throughout this section it is quoted “The closest options with interventions are ODU 16, 17 and 18 which are within approximately 1 km of the SAC, with ODU 18 being 50m away at its closest point. Review of aerial photography and <a href="http://www.magic.defra.gov.uk">www.magic.defra.gov.uk</a> shows the habitat in these areas to be sand and gravel.”. It is not very clear what is meant by this statement in relation to effects upon the SAC. Within 50m of ODU 18 the designated features salt marsh and saline lagoon are present which should be focused upon compared to the substrate present at the construction sites outside of the protected site.</p>   | - Wording in Table 3-11 updated with reference to saline lagoons and Atlantic salt meadows. |
|                | Environment Agency | 18             | <p>General comment:</p> <p>Agree that likely potential impact pathways are:</p> <ul style="list-style-type: none"> <li>- Direct loss and physical disturbance to habitats and species</li> <li>- Temporary increase in suspended sediment concentration (SSC) and sediment deposition leading to contaminant mobilisation, turbidity and smothering effects</li> <li>- Underwater noise and vibration</li> <li>- Introduction and spread of invasive non-native species</li> </ul> <p>Agree with the decision to take some sites to an Appropriate Assessment.</p>   | - Comment noted. No changes to HRA report made in response to the comment                   |
| MCZ screening  | Natural England    | 19             | <p>Southbourne Rough MCZ</p> <p>In screening decision it refers to the Needles MCZ. This should say Southbourne Rough MCZ</p>  | - Table 3 was updated to correct this   |
| WFD assessment | Environment Agency | 20             | <p>General comment:</p> <ul style="list-style-type: none"> <li>- Feel it is overall a thorough WFD assessment that has scoped in the relevant waterbodies and assessed the potential impacts of the various options correctly.</li> <li>- Would have preferred the hydro morphology quality elements to be included in the initial section that identifies the biological and physio-chemical quality elements and the potential impacts of the options on those. I presume these were not detailed in this section as they are considered to be ‘supporting’ elements only. However, the impacts on morphology are considered further on in the assessment and on balance I think the assessment has covered the risks to morphology satisfactorily.</li> </ul> | - Comment noted. Not changes to WFD report made in response to the comment.                 |

| <b>Deliverable</b> | <b>Consultee</b> | <b>Comment number</b> | <b>Summary of comments</b>   | <b>Action taken to finalise the Strategy</b> |
|--------------------|------------------|-----------------------|--|--|
|                    |                  |                       | - Agree with the conclusions about the residual risks following mitigation measures being implemented and particularly the options relating to beach recharge. |  |

### **3.3 Trans-boundary consultation responses**

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

## 4. Reasons for selecting the adopted Strategy in light of reasonable alternatives

### 4.1 Introduction

4.1.1 The recommended approach in the final Strategy was considered against a number of reasonable alternatives during its development. The major reasons for selecting the adopted Strategy over the reasonable alternatives are set out in this section.

### 4.2 Development and appraisal of Strategy options

4.2.1 To develop and appraise options the Strategy frontage was divided into six Strategy Management Zones (SMZs), which are broken down further into 18 Option Development Units (ODUs). Options were developed for each ODU.

4.2.2 A key part of the appraisal process was the assessment of 'reasonable alternatives' for the Strategy.

4.2.3 The Long List Options Report (AECOM, 2022) presents the long list of options. The long list comprised a wide range of different measures that could potentially be used in each ODU to manage the flooding and erosion risks facing the coastline.

4.2.4 The Short List Options Report (AECOM, 2023) presents the short list of options. These options comprise high-level strategic options for each SMZ, as well as appropriate local measures for implementing these strategic options in each ODU.

4.2.5 The draft short list of options was presented to the public and key stakeholders for review and feedback. This took place in March 2023. Updates to the short list of options were then made to reflect key feedback. Further work was then undertaken to develop the short list of options in more detail to inform the selection of the leading option(s).

4.2.6 The Strategy leading options were then identified by undertaking a detailed economic, environmental, technical, and social appraisal. Full details of this can be found in the Leading Options Report (AECOM, 2024). Up to three types of Leading Option were selected in each ODU:

- **The National Economic Leading Option:** this is the Leading Option which is identified by following the Environment Agency's Flood and Coastal Erosion Risk Management Appraisal Guidance.
- **The Local Aspirational Option:** this option considers local opportunities, wants and needs to deliver wider benefits. This option typically costs more than the National Economic Leading Option.
- **Backup Option:** this option has been identified where there is a large funding shortfall. It is typically a lower cost option that will be more easily funded if funding is limited.

## 4.3 Role of the SEA in the appraisal

- 4.3.1 A central role of appraising reasonable alternatives is to help identify the relative sustainability merits of different approaches to delivering flood and coastal erosion risk management strategies in the Strategy area.
- 4.3.2 The findings from the SEA fed into the decision-making criteria and formed the environmental appraisal element of the option appraisal process.
- 4.3.3 For each of the short list options, the SEA examined likely significant effects on the baseline, drawing on the sustainability topics and objectives identified through scoping as a methodological framework. The findings of the SEA were fed back to BCP Council, NFDC, and the Environment Agency to aid decision-making in relation to the leading options for the draft Strategy. This approach also helped ensure that clear reasons could be identified for progressing the leading options and rejecting alternative options.
- 4.3.4 The SEA framework was used to assess options under consideration in the development of the Strategy.
- 4.3.5 The key reasons for selecting the adopted Strategy over the reasonable alternatives are shown in **Table 4.1** overleaf.

**Table 4.1 Reasons for selecting the leading options**

| <b>SMZ</b>               | <b>ODU</b>                    | <b>Leading Option(s)</b>  | <b>Explanation</b>  |
|--------------------------|-------------------------------|---|---|
| 1 – Muford Sandbank      | 1: Hengistbury Head East      | - National Economic Option: Do Minimum<br>- Local Aspirational Option: Management Realignment                   | The selection of the National Economic Option (Do Minimum) was heavily influenced by the economic case. If extra funding can be secured, delivery of the Local Aspirational Option (Managed Realignment) is likely to lead to greater environmental benefits as indicated by the SEA and was therefore also identified as a leading option. The Local Aspirational Option would help the Strategy achieve key social, environmental and FCERM objectives.   |
|                          | 2: Muford Sandbank            | - National Economic Option: Do Minimum<br>- Local Aspirational Option: Maintain with Adaptation                 | The selection of the National Economic Option (Do Minimum) was heavily influenced by the economic case. If extra funding can be secured, delivery of the Local Aspirational Option (Maintain with Adaptation) is likely to lead to environmental benefits across a range of categories as indicated by the SEA and was therefore also identified as a leading option. There are also opportunities for BNG with this option such as Sand Dune creation.   |
| 2 – Christchurch Harbour | 3: Christchurch Harbour South | - National Economic Option: Adaptation / Resilience A<br>- Local Aspirational Option: Adaptation / Resilience C | The selection of the National Economic Option (Adaptation / Resilience A) was heavily influenced by the economic case. Whilst there are no major negative environmental impacts associated with this option (there are some minor impacts and uncertainty) there is potential to deliver greater environmental benefits and therefore the Local Aspirational Option (Adaptation / Resilience C) was also identified.<br><br>If extra funding can be secured to deliver the Local Aspirational Option, it would involve additional erosion defences to the access road to Hengistbury Head and a historic landfill site. This is likely to lead to environmental benefits under the transport and movement, land, soil and water resources, and population and communities SEA topics as indicated by the SEA. |
|                          | 4: Wick                       | - National Economic Option: Sustain C<br>- Local Aspirational Option: Sustain B                                 | The selection of the National Economic Option (Sustain C) was heavily influenced by the economic case. However, this option could lead to negative impacts to land, soil and water resources and also population and communities SEA categories if the existing quay wall fails adjacent to the recreation ground / historic landfill site. Therefore, the Local Aspirational Option (Sustain B) was also identified which would involve maintaining the quay wall and prevent these environmental impacts from occurring. Delivery of the Local Aspirational Option will be subject  |

| SMZ | ODU                            | Leading Option(s)  | Explanation   |
|-----|--------------------------------|--|---|
|     |                                |  | to funding availability. There are opportunities for BNG for both options but the Local Aspirational Option is the more environmentally sustainable option.   |
|     | 5: Willow Drive and the Quomps | <ul style="list-style-type: none"> <li>- National Economic Option: Improve D-F</li> <li>- Local Aspirational Option: Improve A-C</li> <li>- Backup: Adaptation / Resilience</li> </ul> | <p>The selection of the National Economic Options (Improve D-F) was heavily influenced by the economic case. The Local Aspirational Options (Improve A-C) also have a strong economic case. Both sets of options will also likely deliver a range of environmental benefits across a range of SEA categories. These options also have potential to deliver BNG and opportunities will be investigated during further appraisal / design work.</p> <p>Delivery of the National or Local Aspirational Options is subject to acquiring the necessary funding. If funding is not available then the Backup Option (Adaptation / Resilience) would be delivered.</p> |
|     | 6: River Avon West Bank        | <ul style="list-style-type: none"> <li>- National Economic Option: Adaptation / Resilience</li> </ul>  | <p>There are likely to be some negative environmental impacts associated with the National Economic Option (Adaptation / Resilience). However, there is not an economic case to deliver any of the alternative Do Something options considered and therefore the Adaptation / Resilience option is the viable way forward. The alternative is to undertake Do Nothing or Do Minimum which would lead to significant negative impacts across a range of environmental categories.</p>  |
|     | 7: Rossiters Quay              | <ul style="list-style-type: none"> <li>- National Economic Option: Improve A</li> <li>- Backup: Adaptation / Resilience</li> </ul>   | <p>The selection of the National Economic Option (Improve A) was influenced by the economic case but it will likely also deliver a range of environmental benefits. The option is likely to lead to significant environmental benefits across a range of SEA categories, including the climate change, historic environment, transport and movement and population categories.</p> <p>Delivery of the National Economic Option is subject to acquiring the necessary funding. If funding cannot be achieved the Backup Option (Adaptation / Resilience) would be delivered.</p>   |
|     | 8: River Avon East Bank        | - N/A  | <p>As outlined in the Leading Option Report (AECOM, 2023), options in ODU 8 have not been appraised fully as part of the Strategy as it was agreed that options for managing the flood risk would be developed as part of future projects on the Lower River Avon. No further details are therefore provided in the SEA for the potential environmental impacts of options in ODU 8.</p>  |

| SMZ                                 | ODU                             | Leading Option(s)   | Explanation   |
|-------------------------------------|---------------------------------|---|---|
|                                     | 9: Stanpit                      | <ul style="list-style-type: none"> <li>- National Economic Option: Sustain A</li> <li>- Backup Option: Adaptation / Resilience</li> </ul>   | <p>The selection of the National Economic Option (Sustain A) was influenced by the economic case but it will also likely to lead to environmental benefits across most SEA categories. There are significant potential positive benefits to biodiversity through saltmarsh restoration / enhancement which would provide BNG and would help the saltmarsh habitat adjust to sea level rise and climate change.</p> <p>Delivery of the National Economic Option is subject to acquiring the necessary funding. If funding cannot be secured then the Backup Option (Adaptation / Resilience) would be delivered.</p> |
|                                     | 10: Mundeford                   | <ul style="list-style-type: none"> <li>- National Economic Option: Improve A</li> <li>- Backup Option: Adaptation / Resilience</li> </ul>   | <p>The selection of the National Economic Option (Improve A) was influenced by the economic case but it will also likely lead to environmental benefits across most categories as indicated by the SEA. For the Improve A option there are also significant potential positive benefits to biodiversity through saltmarsh restoration / enhancement which would provide BNG.</p> <p>Delivery of the National Economic Option is subject to acquiring the necessary funding. If funding cannot be secured then the Backup Option (Adaptation / Resilience) would be delivered.</p>                                   |
|                                     | 11: Mundeford Quay              | <ul style="list-style-type: none"> <li>- National Economic Option: Do Minimum</li> <li>- Local Aspirational Option: Adaptation / Resilience</li> </ul>                                  | <p>The selection of the National Economic Option (Do Minimum) was heavily influenced by the economic case. If extra funding can be secured, delivery of the Local Aspirational Option (Adaptation / Resilience) would be delivered. Both options are likely to lead to negative environmental impacts but the economic case is not sufficient to justify delivering other Do Something options. The magnitude of environmental impacts are likely to be much less for the Local Aspirational Option than the National Economic Option and therefore this is the aspiration if funding allows.</p>                   |
| 3 – Christchurch Beaches and Cliffs | 12: Avon Beach and Friars Cliff | <ul style="list-style-type: none"> <li>- National Economic Option: Improve A</li> <li>- Local Aspirational Option: Improve C</li> <li>- Backup Option: 'Scaled back' Improve</li> </ul> | <p>The selection of the National Economic Option (Improve A) was influenced by the economic case. The Local Aspirational Option (Improve C) was also identified as it would provide wider social benefits. All three of the leading options in this unit would also likely deliver major positive impacts across a range of environmental categories. Opportunities for BNG should be explored during further appraisal / design. New groynes in this location as part of these option present an opportunity to create intertidal habitat areas / pools to support ecology</p>                                     |

| SMZ                               | ODU                               | Leading Option(s)   | Explanation  |
|-----------------------------------|-----------------------------------|---|--|
|                                   |                                   |   | and there could also be opportunities to use biodiversity promoting materials and features as part of any refurbishments to the existing seawall defences.   |
|                                   | 13: Highcliffe                    | <ul style="list-style-type: none"> <li>- National Economic Option: Improve C</li> <li>- Local Aspirational Option: Improve A</li> <li>- Backup Option: 'Scaled back' Improve</li> </ul>                 | The selection of the National Economic Option (Improve C) was influenced by the economic case. The Local Aspirational Option (Improve A) was also identified as it would provide wider social benefits. All three of the leading options in this unit would also likely deliver major positive impacts across a range of environmental categories. Opportunities for BNG should be explored during further appraisal / design. Refurbishing / upgrading the rock defences in this location as part of this option present an opportunity to create intertidal habitat areas / pools to support ecology and biodiversity.   |
| 4 – Naish Cliff and Barton on Sea | 14: Naish Cliff and Barton on Sea | <ul style="list-style-type: none"> <li>- National Economic Option: Managed Realignment A</li> <li>- Backup Options: Managed Realignment B, Management Realignment D, Maintain</li> </ul>                | The selection of the National Economic Option (Managed Realignment A) was influenced by the economic case and this option is also likely to lead to major positive significant effects across many SEA categories. However, funding is uncertain and therefore several backup options were also identified in case funding cannot be secured. Managed Realignment B is expected to have similar positive environmental effects, whilst Managed Realignment D and Maintain do not deliver the same level of positive environmental effects. Maintain has negative effects noted for most SEA topics but this option would only be delivered if the other backup options were also not viable. |
| 5 - Taddiford                     | 15: Barton on Sea to Hordle Cliff | - National Economic Option: Do Nothing  | Delivery of the National Economic Option (Do Nothing) is likely to lead to minor negative environmental impacts across a range of SEA categories. However, there is no economic case in this unit to Do Something and therefore no viable alternatives exist. A positive of the Do Nothing option is that it could lead to improvements to the SSSI condition due to erosion of the cliff face in the future.  |
| 6 – Milford on Sea                | 16: Cliff Road                    | <ul style="list-style-type: none"> <li>- National Economic Option: Managed Realignment C</li> <li>- Local Aspirational Option: Management Realignment A/B</li> <li>- Backup Option: Maintain</li> </ul> | The selection of the National Economic Option (Managed Realignment C) was influenced by the economic case. The Local Aspirational Options (Managed Realignment A/B) were also identified as these options would lead to an earlier intervention which aligns with the aspirations of the council. Either of the National Economic or Local Aspirational Options are likely to lead to positive impacts across most environmental categories. With these options, with the construction of a local strong point, there is potential to explore BNG opportunities. For example, if a   |

| SMZ | ODU                         | Leading Option(s)  | Explanation  |
|-----|-----------------------------|--|--|
|     |                             |  | <p>rock structure is used opportunities for habitat creation could be explored during further appraisal / design work.</p> <p>The delivery of the National Economic or Local Aspirational Options is subject to funding and if funding cannot be found then the Backup option (Maintain) may be delivered instead. This option does not deliver the same level of positive environmental impacts with negative impacts noted in most categories.</p>   |
|     | 17: Rook Cliff              | <ul style="list-style-type: none"> <li>- National Economic Option: Improve C</li> <li>- Local Aspirational Option: Improve A/B</li> <li>- Backup Option: Maintain</li> </ul> | <p>The selection of the National Economic Option (Improve C) was influenced by the economic case. The Local Aspirational Options (Improve A/B) were also identified as these options would lead to an earlier intervention. Either of the National Economic or Local Aspirational Options are likely to lead to positive impacts across most environmental categories. With these options there is potential to explore BNG opportunities during further appraisal / design.</p> <p>The delivery of the National Economic or Local Aspirational Options is subject to funding and if funding cannot be found then the Backup option (Maintain) may be delivered instead. The impacts with the Maintain option are more uncertain, as it is unclear how the existing defences will perform in the future.</p> |
|     | 18: Milford on Sea Frontage | <ul style="list-style-type: none"> <li>- National Economic Option: Improve A</li> <li>- Backup Options: Improve B and Maintain</li> </ul>                                    | <p>The selection of the National Economic Option (Improve A) was influenced by the economic case and the option is also likely to lead to positive significant effects across most SEA topics. There is also potential to explore BNG opportunities during further appraisal / design.</p> <p>However, funding for this option is uncertain, and if funding cannot be found, then a Backup option Improve B or Maintain may be delivered instead. The impacts of Improve B are similar to Improve A. The impacts with the Maintain option are more uncertain, as it is unclear how the existing defences will perform in the future.</p>   |

## 5. Environmental monitoring measures during Strategy implementation

### 5.1 Introduction

- 5.1.1 The SEA Regulations require that: *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.”*
- 5.1.2 The Regulations also state that the statement should set out *“...the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.”*
- 5.1.3 Monitoring in SEA is a means of evaluating the environmental performance of the Strategy and monitoring compliance through its implementation. Measuring indicators over time can identify long-term positive or negative changes and trends in the environment and can build knowledge on how these trends will affect (or will be affected by) the implementation of the Strategy itself. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements.
- 5.1.4 It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, some of the indicators to monitor are based on data that is already being routinely collected at a local level by BCP Council, NFDC or their partner organisations.

### 5.2 Proposed monitoring programme

- 5.2.1 **Table 5.1** below outlines a proposed monitoring programme for measuring the Strategy’s implementation in relation to the areas where the SEA has identified significant effects or significant opportunities for an improvement in environmental performance to arise. The proposed programme also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the Strategy are achieved through the planning process.
- 5.2.2 It is anticipated that monitoring of the effects of the Strategy will primarily be undertaken by BCP / NFDC Councils and the Environment Agency as part of the process of preparing their Annual Monitoring Report (AMR). However, BCP / NFDC Councils and other key stakeholders could undertake additional monitoring specific to Flood and Coastal Erosion Risk Management and coastal change if budget and resources are available.
- 5.2.3 **Table 5.1** is only a proposed monitoring programme and discussions between stakeholders will be required to confirm and implement the programme. This includes reviewing the suggested responsibilities which have not been committed to at the time of writing this document. Discussions will be needed to agree on which stakeholders are responsible for which monitoring action.

**Table 5.1 Proposed monitoring programme for the SEA for the Strategy**

| <b>Indicator</b>                    | <b>Proposed monitoring method</b>   | <b>Suggested responsibility</b>                           |
|-------------------------------------|---|---|
| Historic environment                | Develop specific monitoring plan for ODU 1 and ODU 6 to capture impacts of coastal change and undertake archaeological assessments.   | BCP Council / Historic England.                           |
| Historic environment                | Monitoring of flood and erosion damage to historic assets, such as listed buildings and scheduled monuments.  |   |
| Historic environment                | Heritage impact and archaeological assessment for ODU 6. Option appraisal study for heritage assets.  |   |
| Historic environment                | Programme of recording in erosion prone areas.  |   |
| Marine environment                  | Develop monitoring programme for ODUs 2, 12, 13, 16, and 18 to understand impacts of beach nourishment on biodiversity on beaches and nearshore waters in relation to planned renourishments. | BCP Council / NFDC / Environment Agency / Natural England |
| Biodiversity and intertidal habitat | Monitor condition of intertidal habitats and other key areas of biodiversity / habitats along the frontage to determine changes in condition and extent over time.                            | BCP Council / NFDC / Environment Agency / Natural England |
|                                     | Investigate opportunities for habitat creation in ODUs 3, 9 and 10  | BCP Council / Environment Agency / Natural England        |
| Geodiversity                        | Monitor exposure of geological features in Highcliffe to Milford Cliff SSSI designation.  | BCP Council / NFDC / Natural England                      |
| Historic landfill sites             | Monitor erosion rate of historic landfill sites in ODUs 3, 4, 5, 9, and 11 and undertake assessment of potential for contaminated materials.  | BCP Council / Environment Agency / Natural England        |

- 5.2.4 Separate monitoring and mitigation relating to scheme delivery will be required (in addition to the Strategy monitoring programme) and this will need to be assessed on the scheme by scheme basis. For many schemes in proximity to European sites this will require project level HRA.
- 5.2.5 The scheme level monitoring and mitigation will need to be decided upon through design and engagement with the relevant stakeholders. For example, mitigation in the vicinity of historic assets will be required which could be supported by a programme of survey, recording and investigation to record the features and identify any features not yet identified.
- 5.2.6 Further engagement with the public and stakeholders will also be needed during scheme development and design.

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