

Shoreline Management Plans

Introduction

1. The 1995 Guidance for the Preparation of Shoreline Management Plans (SMP's) published by the Ministry of Agriculture, Fisheries and Food (MAFF) defined an SMP as a "document which sets out a strategy for coastal defence for a specified length of coast, taking account of natural coastal processes and other environmental influences and needs".
2. SMP's as they currently exist, resulted in the main from this Guidance. While some authorities had commenced work on plans encompassing the wider regional view of Shoreline Planning prior to this, it was the issue of the Guidance that was the main instigator. The Guidance was prepared by consultants using a steering committee drawn from MAFF, the Environment Agency, Local Government and English Nature. This format has been followed by the Department for Environment for Food and Rural Affairs (Defra), the successor to MAFF when preparing subsequent Guidance in 2001 and the current draft Procedural Guidance.

Context and Limitations

3. The SMP has no statutory position. It is solely a plan for the management of flood and coast defence. It informs other policy documents and in turn is influenced by other plans. As such, it stands to some degree in isolation and is reliant on these other policies for its satisfactory delivery. Inevitably, this limits the depth and breadth of the topics and issues that can be taken into account when preparing the SMP and, as will be shown, severely affects its deliverability. As such, there is now a general belief in North Norfolk that the SMP process is seriously flawed. The draft plan, as prepared, complies with the latest Guidance from Defra, but because it does not address all the issues, it is not acceptable to the communities it affects and is, in effect, not deliverable. In short it is the case that if an SMP delivers defences it is acceptable to the community and hence deliverable. If it does not then it becomes unacceptable to the communities and becomes undeliverable.

Technical Aspects

4. The present SMP Guidance seeks to promote a sustainable coast looking forward over the next 100 years. This is an aim that has much support. Generally, there is also an acceptance of the technical aspects of the SMP: that the SMP has followed the Guidance and that its conclusions are valid, although unacceptable. There is one exception to this: the SMP concludes that off-shore dredging for mineral extraction does not have an effect on coastal processes. The Council does not accept these findings in the absence of positive evidence to the contrary. Therefore should we be permitting dredging to go ahead in the absence of this knowledge, given that the consequences are not reversible.
5. There are some technical matters that it is difficult for an SMP to take full account. For instance, short stretches of "Hold" policies interspersed with length of "Retreat" will lead to the development of promontories. Although mentioned in the SMP report, it is not explored and the question has to be asked as to whether this is sustainable. The detailed analysis necessary is not appropriate at the SMP level, being more appropriate at strategy development stage, but it does suggest policies may not be wholly sustainable. It implies that economic factors associated with property values have held greater sway than perhaps the wider view of coastal processes. Hence the SMP is a compromise that is difficult to justify to the communities affected.

Economic Aspects

6. This inference also leads to the conclusion that the narrow economic view that takes account primarily of property values, has been used without considering social or socio-economic costs. Indeed, the SMP's clearly states that only commercial and residential property values have been used to establish baseline economic benefits. Other benefits such as amenity, local economic impact or environment have not been included. Although it is recognised that the Cost Benefit Analysis is a tool that at one level serves to measure one scheme against another, nevertheless this omission highlights the injustice felt by the small communities in Norfolk and lends credence to the belief that they are largely ignored by Central Government. The value of some of these community economic factors is demonstrated in a separate Appendix to this report. Whilst it is recognised that their inclusion would apply across the board to all other coastlines, nevertheless the expansion of the economic justification to include these would, at a minimum, demonstrate that all factors had been taken into consideration.
7. The expansion of the economic justification described above could lead to some changes in policy for the coast. It is recognised, however, that these changes are likely to be minor in the overall context of SMP's nationally and would not of itself make the SMP acceptable to the communities. In short, the SMP has been created but it is not deliverable as it does not (and cannot under current procedures and legislation) have a means of meeting the aspirations of those who are directly affected by the policies. The SMP draws attention to this but cannot deliver.

Framework for Delivery

8. The economic and socio-economic issues referred to above are minor compared with the social consequences that result from the SMP process. The SMP is solely looking at policies for managing flood and coastal defence and is precluded from looking beyond this other than making reference to them and highlighting the need for further supporting frameworks. It is clear that what is needed is a framework that will allow a number of different courses of action to be followed depending on the local circumstances. These could include relocation of premises, roll-back of communities, rigidly enforced development controls through the Local Development Framework and Area Action Plans, and ultimately perhaps some form of compensation or acquisition. The recent field trip by the LGA SIG to Normandy showed that a mechanism can be put in place to acquire property at risk from erosion. Although it was clear that the French mechanism had its failings, it nevertheless exists, in contrast to the United Kingdom. In the United Kingdom this also contrasts with the situation that pertains in other fields such as the construction of a new road or airport where the land/property required for the development is acquired at the market rate. Although not identical, the situations emerging from the SMP's are similar in many respects.
9. The visit to Normandy by the SIG highlighted the different approach adopted by the French. Clearly, there was a demonstrable need for a wider strategic approach to coastal management, with French practice well behind British practice. This has resulted in a piecemeal approach to coastal management. In contrast, there was acknowledgement through the Law Barnier for a requirement for intervention centrally to acquire properties at significant risk from erosion. This was accompanied by rigid development controls (including limits on maintenance and improvements to properties) in the zones adjoining those of highest risk. While there were conflicting views expressed concerning the effectiveness and the practicalities of Law Barnier, it nevertheless represents a significant departure from British practice and hence is worthy of further investigation to see if a similar scheme could be applied in the UK. In short, we must ensure that we address the broad issues of social justice.

Sustainability

10. The Government has, in recent years, advocated a sustainable approach to develop. This is entwined in the five Guiding Principles:
 - Living within environmental limits
 - Ensuring a strong, healthy and just society

- Achieving a sustainable economy
 - Promoting good governance
 - Using sound science responsibly
11. In expanding upon these principles the Government calls for “meeting the needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunities for all”; and “building a strong, stable and sustainable economy in which environmental and social costs fall on those who impose them”. SMP’s produced in accordance with current Government Guidance would appear not to be capable of complying with these principles, at least not without further supporting frameworks. There is quite clearly a lack of social justice within the current SMP process that will render many SMP’s unacceptable and, in consequence, undeliverable. Thus we have an SMP that contradicts the Government’s stated principles of sustainability.

Conclusions and Recommendations

12. SMP’s represent a significant advance on previous practice: the present non-strategic approach in France amply demonstrated the failings of an ad hoc approach. SMP’s are essential to ensuring an integrated approach to coastal management. In a time of relative sea level rise the concept of working towards a more naturally evolving coast is one that is to be commended. However, it comes at a cost and that cost is the effect on coastal communities that will inevitably be lost to coastal flooding or erosion. That cost, which will include the loss of whole communities, has not been fully accounted for in the SMP process because, under current Government procedures and legislations, it cannot.
13. The way forward is change: change to procedures and legislation; change to the public’s understandings and aspirations. The first can only come about by Central Government action and that will require lobbying at all levels. The second requires publicity and education. Both are costly but are necessary if the SMP process is to move forward.
14. Essential also to the process is better integration. This must start at Government level (ODPM, Defra and Treasury) and better co-ordination between the many plans that apply to the coast. In the context of this report, the relationships between the SMP and the LDF needs to be put on a stronger basis. The LDF is essential to the delivery of the forward planning aspects of the SMP, although its time horizons are somewhat limited.
15. A number of projects are in train investigating mechanisms and problems to be overcome; eg. making space for water adaptation project, the Tyndall Centre study into sustainable coasts and sustainable communities, and a proposal from the Isle of Wight considering similar issues. Inevitably, these will require support in the form of officer and Member time and finance.
16. Clearly there are many strands that need to be pulled together. Lead for some of this must come from Central Government, but Local Government has a major role to play. Changes are already afoot in the high level management of flood and coast defence. With Defra proposing to transfer some functions to the Environment Agency, and a threat of the loss of the Local Authority coast protection function also to the Environment Agency, Local Government must ensure its voice is heard. If not, both it and the communities it represents will lose out.
17. Now is not a time to wait for events to overtake us. On the narrow front up to 100 properties in North Norfolk will be lost over the next 20 years, some this winter. North Norfolk is not alone. As SMPs roll out across the country it will become obvious that the problems facing our Council will also affect many other, particularly rural authorities in a similar way. Present mechanisms for flood and coast defence undervalue our rural coastal communities and the consequence is the potential loss of these communities. On the wider front is the prospect of loss of functions to the Environment Agency.
18. It is recommended therefore that:

- the LGA and coastal SIG continue to lobby Central Government for a role for Local Government in coastal management;
- the SIG and its officers continue to support the many initiatives that are investigating aspects of coastal change and management;
- the coastal SIG considers supporting some of these financially.

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