

English Coastal Groups

3 September 2009

Coastal Erosion Team
Defra
Area 2D
Ergon House
Horsferry Road
London
SW1P 2AL

Dear Sir or Madam

CONSULTATION ON COASTAL CHANGE POLICY

The English Coastal Groups play an influential role working alongside Defra and the Environment Agency in terms of assisting delivery of the Strategic Overview for Flood and Erosion Risk Management (EASO). The Coastal Groups welcome the positive initiative of Defra in preparing this coastal change policy and are pleased to be able to make a contribution to the consultation programme. The completion of the second round of shoreline management plans (SMPs) by the end of 2010, together with other current consultations and initiatives by both Defra and CLG mean that this is an ideal time to develop a national coastal change policy which takes account of the latest climate change predictions and which balances in a sustainable and even-handed way the socio-economic and environmental demands around the English coastline. In terms of the specific views sought in your consultation document our answers are as follows:

Coastal Erosion Assistance Package (Chapter 3 of Defra Consultation on Coastal Change Policy)

Q1. Do you agree that it is appropriate for government to make available public funds to local authorities to cover demolition costs for which private homeowners are currently liable?

A. Yes. The coastal groups support the principle of public funds being made available to local authorities to cover demolition costs for private owners.

Q2. Is the homeowner assistance package set at the right level to strike the balance between individuals taking responsibility for their investment decisions, and ensuring that local authorities are able to provide practical assistance to homeowners who lose their home as a result of erosion? If not, how could this be done?

A. No. We believe that in order to engender support from affected coastal stakeholders, a more substantial level of financial support is required than that currently proposed. We note (as cited in the box on page 22 of the consultation document) that the Environment Agency will pay compensation where it reduces the standard of protection for a property. We believe similar rules should apply where there is a change in coastal protection policy from hold the line to no active intervention. This is particularly the case where residents have moved to the coast with the expectation that the frontage will continue to be defended and where policy changes to, for example, 'no active intervention' are made at short notice. We believe that if a change in policy is to be implemented within the first two epochs (0-20

English Coastal Groups

years or 20-50 years) the homeowner should be supported by a financial package matching the current market value of the property, when the property becomes directly affected.

It is important to remember that when properties are destroyed or seriously damaged, for example by fire or flooding, the building plot remains whilst this is not the case for coastal erosion. We believe that this total loss should also be reflected in the assistance package.

We believe that through planning policy processes (eg Local Development Frameworks supported by SMP2s and the inclusion of relevant information on coastal defence policy in land charge questionnaires) adequate warning of potential change can now be provided for the third epoch 50-100 years. No doubt further useful advice on this question may be obtained following the completion of the proposed Defra Pathfinder Project programme.

In order to address the difficulties facing homeowners along eroding frontages we believe that further initiatives supported by the government such as buy-to-let schemes could prove very helpful in addressing what will become an historical problem for existing properties as firm coastal change policies are implemented through the planning process in years to come.

In terms of the government supporting the demolition costs, site clearance and removal costs for affected residents, we believe that this is a very positive starting point. We do not believe that the fact that the Coast Protection Act 1949 includes only permissive powers to undertake coast protection works provides a sufficient argument and just case for not providing higher levels of support for affected frontagers.

The challenge for the future is to ensure prospective homeowners in the coastal zone are fully informed of the risks through a high standard of public information made available through local authorities (as coast protection and local planning authorities) , and through the land charges process. An education programme for those involved in property transactions at the coast (estate agents, surveyors, architects and solicitors) should be implemented supported by the provision of non-technical good practice guidance in this field. The re-structuring of the coastal groups as part of the Environment Agency Strategic Overview should help to ensure that there is a more uniform approach to provision of coastal risk information through local authorities, which, together with the input from the Environment Agency's Coastal Engagement Team, should make a positive start in this direction.

In terms of levels of support to homeowners we recommend that a more detailed study be made of international examples, particularly the approaches adopted in the United States and in France where, through household insurance, support packages are promoted for properties affected by natural hazards.

In relation to the proposed level of the support package for demolition and clearance we believe that demolition costs are usually of the order of £5,000 and removal and local authority legal costs amount to an additional £9,000 for a typical £250,000 sale and purchase.

Q3. *How should the payment mechanism for demolition and moving assistance grant work? What evidence could be provided to Defra to support a claim for demolition and moving costs?*

A. Information available to local authorities through the SMP2 work, coastal monitoring programmes and local knowledge, together with close working between coastal engineering, planning and building control officers, should provide timely warning as to when claims for

demolition and moving costs are likely to be required (e.g. looking ahead for the next five years). Local authorities can obtain estimates for the costs of demolition and removal costs which can form a claim to the government.

Q4. *Apart from the current plans to provide more information on coastal erosion risk through maps, etc. in what other ways can homeowners be informed about purchasing on areas of the coast at risk from coastal erosion and factor this into their purchase?*

- A. There are a number of possible avenues for providing better information for homeowners in this respect, these include:
- information held by coast protection and planning in local authorities;
 - information provided on land charge surveys and through home information packs;
 - guidance notes provided to key players in the property industry such as estate agents, surveyors, building societies, etc. on local conditions;
 - increasingly defined coastal erosion risk maps in the light of experience with their operation.
 - We recommend prospective purchasers should seek independent advice from a suitably qualified specialist.

Community Adaptation Planning and Engagement (Chapter 4 of the Defra Consultation on Coastal Change Policy)

Q5. *Is the draft guidance useful, have you any suggestions as to how it could be improved?*

- A. We believe that the draft guidance is an important step forward in terms of addressing the issue of coastal change and adaptation. We believe that, in order to ensure that guidance reaches those coastal stakeholders who do not necessarily have any technical background, additional non-technical guidance should be provided in a clear well-illustrated manner which can be made widely available through a new publication as well as being available on-line.

Q6. *What are the conditions/policies/support do you need in place to facilitate community adaptation planning and engagement?*

- A. Over the last three years a wealth of additional advice and guidance has been provided and consulted upon in relation to coastal management. We believe that by steadily improving integration across government relating to coastal risk management a framework is in place to support an adaptation programme. There are, however, a number of concerns relating to the delivery of adaptation planning and engagement. These include a skills shortage in terms of professionals in the fields of planning and coastal engineering, the lack of a system for career grades in local authorities to encourage the build-up of local knowledge, the need to avoid short-term contracts as far as possible for employees in careers surrounding coastal sustainability and the need to maintain for the future the Coastal Engagement team within the Environment Agency.

The Coastal Groups provide a vital link between central government, the Environment Agency and local authorities. The sustainability of coastal groups, with every increasing demands placed upon them by the Environment Agency in support of the EASO, is an important consideration.

English Coastal Groups

Q7. Are there sufficient communication tools to support technical discussions, how could this be improved?

A. In order to successfully communicate over coastal change there is a requirement for improved training for local authority technical and planning officers through the coastal groups and the Environment Agency. Second, at a non-technical level, there is a need for guidance to be readily available for the wide range of organisations involved in coastal zone management. It is believed that the Pathfinder coastal change initiative could provide support in this direction.

Q8. How should the plethora of decisions that involve community adaptation planning, be made? Should there be local governance structures in place to support adaptation planning, or should this simply evolve without structure?

A. A number of local authorities are already thinking pro-actively in terms of community adaptation planning. This will be strengthened following the publication of the CLGs policy on 'Development and Coastal Change' alongside Defra's 'Coastal Change Policy'. How these documents are taken up and implemented by local planning authorities should be reviewed after two years. In terms of local government structures, it is believed that this should be addressed through existing mechanisms (e.g. coastal groups with increased planning input where currently lacking).

Q9. Are there other ways that we could support partners and organisations in increasing their capacity with change?

A. See questions 5 to 8 above.

Local buildings and properties

Q10. Are there other approaches to avoiding neglect of local buildings and properties to retain community vitality that pathfinders could explore?

A. More widely, in the past, government and other regeneration initiatives (eg Challenge Fund and SRB) have provided valuable assistance to some coastal towns. It is believed that approaches that will assist in avoiding the problems of neglect and maintaining sustainable coastal communities can be drawn out through the results of the various pathfinder projects. In parallel with this it is believed a further, more detailed, review should be undertaken of international good practice in terms of exploring how 'roll back' is achieved, for example, along parts of the French coast and how certain local planning authorities in England are already implementing time- limited planning consents and local regeneration initiatives to avoid the problems of neglect. The results of the Select Committee Inquiry into 'Deprivation in rural coastal areas' could also inform this aspect.

Q11. How best could pathfinders ensure that approaches to supporting local buildings and properties are designed to support the most vulnerable in adapting the coastal change?

A. There is a feeling amongst local communities that assets such as local buildings of historic and heritage interest together with other socio-economic aspects do not receive the same level of consideration and support as the natural environmental assets. It is recommended that, as part of a review of the current 'outcome measures', further consideration is given to how such aspects can be balanced in a more even-handed way. A survey should be undertaken of those

English Coastal Groups

cultural/historic assets likely to be affected by coastal change in order that the scale of the problem and the economic implications are more fully understood.

Business

Q12. Are you aware of any examples of existing sources of support and information enabling businesses to adapt to the risk of coastal change?

- A. No. The coastal network SCOPAC (Standing Conference on Problems Associated with the Coastline) has produced a 'Non-technical guide to coastal risk management' (2009) which provides information to a wide range of coastal stakeholders. The findings of the European Union LIFE Environment Project Response (Responding to the risks from climate change on the coast) 2006 contained a number of European examples of good practice which have been widely disseminated. In the case of coastal instability problems, for example on the Isle of Wight, seminars have been arranged to brief the business sector on the implications of coastal instability and change following the completion of various studies and investigations. More widely the English Coastal Groups provide information to stakeholders along their frontages.

Q13. What do you think the role of Business Link is in providing advice and guidance on managing coastal change risks to business?

- A. We believe that Business Link should be aware of issues relating to the management of coastal change risks to business. However, it is most likely that they will not have the time or experience to be able to provide the necessary advice and guidance required by concerned clients and, therefore, Business Link is likely to forward enquiries direct to the coast protection authority.

Q14. How might advice and support be improved?

- A. Coast protection authorities should make contact with Business Link in order to provide a communications route between them, thereby ensuring that enquiries from concerned coastal businesses can be adequately addressed.

Q15. What do you think are the best ways of ensuring that local businesses are fully involved in community engagement?

- A. The business sector should be represented as a stakeholder within coastal fora and at least as a corresponding member of coastal groups. Alternatively once the most effective avenue for transmitting information to the business community is identified (e.g. this may be through Business Link) relevant organisations can be informed of the importance of policy decisions and changes being implemented.

Q16. What incentives/support would enable local businesses to make use of sites which are unsuitable for permanent development or use but where there are economic opportunities in the short to medium term?

- A. Before committing funding to ad-hoc requests for temporary use of buildings in areas of risk it is recommended that research is undertaken in more detail into the types of uses and opportunities that such sites could present. This could be very helpful for local planning

English Coastal Groups

authorities, businesses and coastal land and property owners in terms of showcasing examples as Defra suggest in their consultation document.

Local and Community Infrastructure (Chapter 5 of the Defra Consultation on Coastal Change Policy)

Q17. How can local authorities prioritise supporting the adaptation of existing assets – are you able to construct business cases for this work?

- A. Local authorities comprising coastal engineers, local authority planners and politicians need to examine carefully the outcomes from the SMP2's relevant to their frontage in order to assess the implications of coastal change on the assets and infrastructure under their jurisdiction. Such work will allow strategic planning to take place that can deal with those coastal emergencies and timely replacement/set-back of infrastructure as required. Examples from the pathfinder projects should also inform this question.

Q18. What advice/topics would be helpful to be covered in the next update to the Department for Transport's 'Policies and Best Practice Handbook' to help support you in transport planning?

- A. Many County Councils and Unitary Authorities already include climate/coastal change implications in their Transport Policies and Programme submissions to the Department for Transport. Inter-departmental group working within county councils and between county and district councils will allow sharing of SMP outcomes in order that these can be translated into transport policy planning. The coastal groups may be able to assist the Department for Transport by providing examples or case studies that could be illustrated in its 'Policies and best practices handbook'.

Q19. Do you have any examples of how best to do this, or ideas of new approaches that you want to share with colleagues?

- A. See answer to question 18 above.

The natural environment

Q20. Do you have any examples of good practice which could provide inspiration and guidance to others in dealing with the interface between the management of dynamic natural coastal environments and community wellbeing?

- A. Advice and information obtainable from local authority coastal engineering sections as well as from the coastal groups' websites provide immediate sources of information. The new SCOPAC 'Non-technical guide to coastal risk management' is specifically aimed at raising awareness amongst the local coastal community. However, although the guide touches briefly on the subject of adaptation, an expanded version focussed on this particular aspect is now regarded as essential. It is hoped that this can be brought forward by SCOPAC and partners through the Defra pathfinder initiative. SCOPAC has held discussions with the Environment Agency on the option of producing a volume combining SCOPAC's 'Non-Technical guide to coastal risk management' with the 'EA Coastal Handbook'.

Q21. *How could we better involve the whole community in working with the natural processes of change on the coast so as to leave future generations with a more dynamic, resilient, thriving and beautiful natural environment?*

A. We believe coastal communities are already becoming increasingly interested and involved with working with natural processes on the coast. There is increased interest and awareness as a result of the influence of the media, for example, the depiction of the coastline through programmes such as the BBC 'Coast' and the publication of a range of popular books either based on television programmes or publications in their own right (e.g. 'The most amazing places on Britain's coast' Readers Digest (2008); and many others). Coastal stakeholders are generally very interested in the environments in which they live, including their social and cultural histories of their frontages. There is no doubt that these interests can be tapped as a valuable asset in terms of introducing the concept of working with natural processes of change on the coast in the future.

An issue is the need for awareness-raising in some larger coastal communities who may assume they will always be protected but for economic (cost-benefit) reasons this may not be the case.

The historic environment

Q22. *As the threat to heritage assets is likely to outstrip resources for securing adaptation options or recording, investment in adaptation or recording will need to be carefully prioritised. How can we decide which heritage assets should be prioritised for investment?*

A. Previous studies have identified a well preserved heritage and palaeo-environmental archive in the coastal and inter-tidal zones around the English coast which can be interrogated to assist shoreline management and coastal planning generally. Our coastal zones and estuaries contain a rich archaeological resource, which if examined appropriately, can provide advice on coastal evolution and change and explain responses to past climatic change. Experience from the past can help understand the possible impacts of climate change in the future. This valuable resource has long been underestimated. This is a particular concern because, as a result of climate change and sea level rise, some of the sedimentary archives will be less accessible or maybe lost in the future.

Key sites merit protection in the same way that natural environments are protected through legislation or guidance. A fundamental question is which of these sites produce the most useful information in understanding coastal change. This issue was addressed as part of the EU LIFE Environment Project 'Coastal change, climate and instability' (2000). As part of this research a ranking system was developed for archaeological and palaeo-environmental sites in terms of their contribution to the science. The study concluded that evidence of this kind has been under-used in the past and can make a fundamental, accurate contribution to an understanding of shoreline evolution.

Q23. *How can communities be involved in the decision making process?*

A. Communities and interested residents can be involved in the decision-making process through membership of organisations such as coastal partnerships, fora and local history societies and archaeological trusts. There are a number of thriving examples of such organisations (e.g. Hampshire and Wight Trust for Maritime Archaeology).

English Coastal Groups

Q24. How do we ensure that we realise the public value of a heritage asset before it is damaged by coastal change?

- A. Close working with English Heritage is essential in order to highlight the public value of heritage assets and to ensure their protection into the future. Identification of archaeological and palaeo-environmental sites in contexts pertinent to the understanding of coastal change has been a major problem in the past. As part of the EU LIFE Environment Project 'Coastal change, climate and instability' (2000) a ranking system was devised that marked a new approach to sustainable management of such resources which are particularly meaningful to the understanding of the English coastline. The ranking system took account of a range of factors including sea level and climatic change, cultural amenity value, visible amenity value, fragility of the site, coastal policy and coastal type. The combined scores derived from these criteria were used to assess the relevance of the site in terms of identifying its importance. Such a methodology allows a ranking of sites which can be used to ascertain both its heritage value and its importance as an indicator of coastal change.

Q25. Do you have any new examples or ideas to be contained in the updated English Heritage guidance?

- A. Please see response to question 24 above.

The coastal group chairmen are grateful for the opportunity to respond to this important consultation. We shall be pleased to expand upon any of the points raised if further clarification is required.

Yours faithfully

Dr Robin McInnes OBE
Southern Coastal Group
on behalf of the English Coastal Groups

Tel: 01983 854865

E-mail: rgmcinnes@btinternet.com

cc. Bryan Curtis, Chairman of the Coastal Groups
cc. English Coastal Group Chairs