

Planning for the impacts of Coastal Change Shoreline Management Plans, Planning & Coastal Change Management Areas

A joint Southern Coastal Group and SCOPAC workshop was held at the National Oceanography Centre, Southampton on 14th September, which focused on the emerging requirements and implications of planning and managing the risks of coastal flooding and erosion. Twenty two authorities were represented by coastal engineers, planners and Elected Members, with approx. half of the 50 attendees from planning departments.

Prof Andy Bradbury (NFDC/CCO) opened the workshop and reiterated the aims of the workshop:-

- to raise awareness of coastal erosion and flood risk areas and methodologies
- that Shoreline Management Plans can often provide the best available scientific evidence to underpin the designation of Coastal Change Management Areas and development of planning policies.

Mike Allgrove (PCC) presented a summary of the statutory planning system and the hierarchy of plans, and introduced the current guidance for considering flood and coastal erosion risk management (FCERM). Key documents are the Planning Policy Statement 25 Supplement and the draft National Planning Policy Framework, which introduced the need for designating Coastal Change Management Areas (CCMAs).

Andrew Colenutt (NFDC/CCO) provided an overview of the tiered approach to FCERM, outlined regional coastal monitoring techniques and analysis, and presented examples from recently approved SMP2s of datasets and methodologies for quantifying and identifying erosion and flood risk areas, and information for stakeholder engagement.

Edward Gerry (NFDC) then presented a case study of how NFDC had interpreted the current guidance and using SMP2 data had identified and designated CCMAs, and developed appropriate policies in the Council's draft Sites and Development Plans. The importance of stakeholder engagement and close liaison between coastal engineering, planners and Elected Members was emphasised.

John O'Flynn (EA) provided a useful overview of the EA National Coastal Erosion Risk Mapping (NCERM) programme with an update on delivery of technical products and the proposed Minister-led programme of data dissemination of erosion risk information from the NCERM public facing website.

Emily Allison (EA RHCP) presented an overview of the Habitat Creation Programme for the South East region, including current sites being developed for inter-tidal and freshwater habitats in the Solent. The financial and legislative options and the need for strengthening and creating partnership approaches for identifying, developing and managing future sites were reiterated. Each EA region has a Habitat Creation Programme.

Cllr Roger Elkins (Arun DC) chaired a lively and informative discussion session which covered a range of topic areas, including the scenarios under which CCMAs should be proposed, the type and level of detail that should appear on the NCERM public facing website, and the uncertainties relating to potential conflicts or opportunities for designating CCMAs and securing habitat creation sites, and implications to permissive development rights of private land/defence owners. Other issues raised included potential implications of designating CCMAs, such as blighting house values; property insurance; future funding for FCERM schemes; protection of heritage assets; and agri-environment incentives to attract landowners for habitat creation.

There appears to be discrepancy between the guidance and possible interpretation of the PPS25 Supplement and Draft National Planning Policy Framework. Whilst the PPS25 supplement practice guide states that CCMAs will not be needed where the SMP policy is to Hold The Line (HTL), the draft National Planning Policy Framework states that Local Planning Authorities should identify as a CCMA any area likely to be affected by physical changes to the coast. This guidance is considered too vague and could apply to much of the coastline. Even where HTL would be funded there could be physical changes to the coast.

Key conclusions from the discussion

- SMP2 data can provide the evidence base for identifying flood and coastal erosion risks and the designation of CCMAAs.
- Due to the aspirational nature of the SMP policies, and the changes in funding of FCERM works, the identification and designation of CCMAAs and presentation of erosion risk in NCERM should not be driven by SMP2 policies and limited to No Active Intervention (NAI) or Managed Realignment (MR) SMP policy frontages, but should reflect the real potential risk of physical changes at the coast.
- There was uncertainty whether designating a CCMA could safeguard existing environmentally important sites or would restrict future habitat creation or developments on or adjacent to the site, and the permissive development rights of private land and defence owners.
- There was considerable concern from Elected Members, planners and engineers with the Minister-led plans for the NCERM public facing web tool to only present the erosion risk for the first 0-20 years. Many authorities emphasised the urgent need to identify the erosion risk for the next 100 years, as presented in the SMP under the NAI/no defences scenario
- Presenting the indicative erosion risk for the three epochs using the 'traffic light' colour coding (red for epoch 1, yellow for epoch 2 and green for epoch 3) as used in the SMP2s was considered a more effective approach for highlighting indicative erosion risk to Elected Members and the public through the stakeholder engagement process, than the proposed NCERM approach of simply providing a summary description of the rate of erosion. The technical validation of the NCERM data presented the 3 colour zones, however, the red zone applied to epoch 3 and green to epoch 1, which could result in confusion as not consistent with SMP2.
- Officers and Members were encouraged to respond to consultations, lobby Ministers and govt departments for :-
 - the NCERM public facing website to present the erosion risk for the 100 year period, rather than for only 0-20 year epoch;
 - CCMAAs and NCERM to present erosion risks under the NAI/no defences scenario, so coastal communities are fully informed of potential risks rather than exclude HTL frontages, as there is no guarantee that funding will be secured to implement SMP2 policies;
 - further clarification relating to planning policy guidance and interpretation