

SHORELINE MANAGEMENT PLANS

Feedback from the pilot SMP2s

Three SMP2 pilots were prepared to assist in the development of the SMP Guidance Note. This note is based on the lessons learned from these pilots and provides some clarification to the original policy guidance notes published last year. (Feedback and assistance from those involved is acknowledged by Defra.)

In general terms, the Guidance has been shown to be “fit for purpose”. But as with any new policy guidance notes, there are areas where clarification is required.

Clarification in this note cover:

- The purpose of an SMP
- Long term investment programme
- Adopting the plan
- Stakeholder engagement
- Guidance on economic appraisal
- The need for an Appropriate Assessment (AA)

The purpose of an SMP

A Shoreline Management Plan is a long term, high level assessment of the risks associated with coastal erosion and flooding at the coast that offers a vision for how the coast is to be sustainably managed in the future. This assessment uses information that is available or readily obtained by the OAs to manage the coast over the next hundred years (split within the three epochs 0-20 years, 20-50 years and 50-100 years). It sets out a framework for action for the OAs involved for prioritising future defence needs, whilst at the same time providing important information (material consideration) for use on other statutory plans, such as the Regional Spatial Strategy and the Regional Economic Strategy. The information contained in the SMP will also form the basis for a Planning Authority to offer advice on future development or advice to the public (and others) on where to avoid building in areas that are likely to be affected by coastal erosion or regular flooding.

SMPs are non statutory and provided they are used as they are intended by local and regional planning authorities, we believe there is no need to consider any change to this approach. One Local Authority has considered the linkages between key statutory plans and the SMP and this is set out on the LGA website. (<http://www.coastalsig.lga.gov.uk/pdfs/SMP2note.pdf>)

Long term investment programme

An output from the SMP is the action plan. This action plan will assist OAs in setting out the long term requirements for future intervention on both capital and maintenance needs. These requirements should be prioritised and used as a basis for OAs forward planning to guide the national programme. The information can also be used to inform investment programmes, either for utilising future national funding, or to assist OAs to identify other sources of funding where national funding might not be available or where the assessment indicates that local investment is required, for example where the majority of the impacts are of a local nature rather than having a national impact. Conversely, the SMP also offers a means of assessing whether flood and coastal erosion works proposed, for example, a third party would be acceptable and, if not, whether action should be taken to prevent their going ahead.

Section 2.8 volume 1 of the SMP Guidance Note sets out the main outputs from an SMP. One of these is “a realistic and affordable action plan for putting the SMP into practice”. As part of this exercise, the plan should state whether any project is likely to be obtained from the flood and coastal erosion national funding route, or whether a local community are seeking other sources of funds.

The action plan will also set out the period of review for the plan. The Guidance did not set a specific timetable for this as we recognise that some of the coastal areas will have a need for more regular reviews, for example, in areas where there are higher erosion rates. At these subsequent reviews, the plan will take account of and adopt any changes in advice on such things as climate change, legislation, politics and local attitudes (see section 2.4 volume 1). As such the SMP policies that are developed will be based on current understanding and current legislation and therefore, there is no intention to commit future governments or local administrations, to inflexible or undeliverable coastal policy options.

Adopting the plan

The SMP (and its associated action plan) should be adopted by all the OAs involved in developing the plan together with the other key organisations (see chapter 4, volume 1). In adopting the plan, the OA is confirming that a) the risk assessment is adequate for the purpose of establishing preferred policy options, and b) the preferred policy options are correct bearing in mind social, economic, environmental and technical considerations.

Approaches for OAs to help communities to adapt to a changing coastline are being considered in a project under Making Space for Water to develop a broader portfolio of options. We have made progress in developing ideas on a range of possible measures which might form an “Adaptation Toolkit” for

communities.

<http://www.defra.gov.uk/environ/fcd/policy/strategy/sd2.htm>

As a result of the strategic overview consultation exercise, Defra will no longer agree these plans, but for the Environment Agency's Regional Director will take on this role of formal agreement to take account of national policy and to ensure national consistency. This agreement will follow adoption by all the OAs (including the local Environment Agency office and the Regional Flood Defence Committee) of the findings of the plan, indicating a commitment by the various OAs to work with the Environment Agency towards a long term sustainable coastline. Only in cases where there is a dispute that cannot be resolved by the Environment Agency will Defra be asked to arbitrate or facilitate a consensus view. (Further details on this will be given in the EA Strategic Overview Implementation Plan which will be on this website shortly.)

Stakeholder engagement

A number of stakeholder engagement models were put forward as part of the pilot exercise on SMP2s. However, the model that involves the setting up of an elected members forum was the model that was recommended from the pilot exercises and is the model that is proposed in the SMP Guidance (see volume 2, page 26). The pilot studies have emphasised the need to inform and involve elected members early and throughout all stages of the SMP process. It is for the Client Steering Group (CSG) responsible for developing the plan to explain the SMP process fully to all the key stakeholders and elected members.

Guidance on Economic Appraisal

Level of Detail

The SMP Guidance (volume II, page 58 and appendix C1) states that a more detailed assessment might be required of a particular frontage at a later stage e.g. as part of a strategic plan. In many cases a strategic plan for that particular length of coast may already exist and it may be that an update to this strategy is all that will be required having determined the findings from the SMP2.

However, feedback from the pilot studies suggest that when the policy option for a particular unit is of marginal viability, a more detailed assessment may be required at the SMP stage. The justification for introduction of any coastal policy option needs to be reasonably robust and a further assessment now may help to avoid unfounded public unrest or blighting of property when the draft report is consulted upon.

In particular, Appendix C 2.2 highlights that there are a number of other assets that are not valued using the Modelling Decision Support Framework

(MDSF) tool and if these other assets were included in the assessment this might give added value to robustly confirm economic viability. In many cases it may be a simple exercise of approaching a utility body or a highway authority to establish the economic use value of their assets (e.g. through traffic volumes) that can be taken into account in the economic assessment of the plan. It is not suggested that a full detailed assessment on any asset is required at the SMP stage and indeed the MDSF tool was developed to provide a simplified approach to undertaking broad economic assessments that would be appropriate in most areas. The steering group will need to consider carefully the benefits of further appraisal against the costs and potential delay that this might introduce to the programme.

Local Damages

Where the economic analysis suggests that national losses do not support future maintenance of defences, there may be good local or social reasons that need to be included in the Multi Criteria Analysis (MCA) to allow for a full assessment to be made on any frontage. However, in cases where local damages or local social issues are the primary driver to support any intervention, there needs to be recognition in the plan that the adopted policy is NOT likely to obtain national funding and that other funding streams or opportunities need to be found. In such cases, this needs to be clearly set out in the plan (see section 2.4 volume 1, page 15).

Agricultural Land Values

Project appraisal guidance 'FCDPAG3' on economic appraisal is planned for review in the future but the revised document will not be available for sometime yet. Recent advice on the use of the multiplier factor for valuing agricultural land suggests it may now be underestimating the appropriate value of agricultural land for project appraisal purposes due to the changes in approach to UK agricultural subsidies. The more recent publication of the Flood Hazard Research Centre FHRC 'The benefits of flood and coastal risk management: A handbook of assessment techniques 2005' has reviewed this area considering the evaluation of land lost to agriculture on a similar basis to FCDPAG3. The study proposes an overall loss equivalent to 65% (table 9.6) of prevailing land values for project appraisal purposes.

Selection of Policy Options

Ideally, the preferred plan (that being the most sustainable and thus avoiding tying future generations into inflexible or expensive options for defence) should be the outcome from the SMP assessment. Appropriate policy options for the three epochs will be based on an analysis of the available information, taking account of technical, economic, social and economic factors and the relationship with other parts of the coast and give equal consideration to achieving requirements in those areas.

The Guidance acknowledges that after consultation with interested parties, the adopted policy options may be different from the preferred policy options on specific lengths of the coast. This may be the case where there are local social factors that come into play. However, the Guidance states that if technical, economic, social and economic factors do not support the adopted policy options, then it is important this is clearly shown in the plan. This should recognise that there are individuals and private organisations that have rights or powers to protect their own property. SMPs will help understand the relationship between any private defences and the risks elsewhere along the coast.

The need for an Appropriate Assessment (AA)

When we issued the guidance last year, we highlighted the need for an Appropriate Assessment (AA) for a Shoreline Management Plan and recommended that they be undertaken as a matter of course. The first plan to prepare such is the SMP2 led by Scarborough Borough Council and can be viewed on its website. See Appendix J.

<http://www.northeastsm2.org.uk/finaldraftSMP2.htm>

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