

Coasts and Estuaries

Introduction

1. The coast is an integral part of the English landscape. Its characteristics vary widely, from exposed sea-facing beaches to tranquil estuaries, from low-lying marshes to high cliffs. The coast is valued for its natural beauty, for its habitats and for recreation. It is both part of our heritage and a contributor to our national and local economies.
2. The coast is not unique in being subject to pressures for new development, which can be intense in particularly attractive areas such as rural estuaries. What makes it different from the rest of the land mass is the physical impact of the sea. Changes in sea levels are altering the shape and geography of England. Public policy seeks to manage this process, and new planning processes have been – and will continue to be – introduced.
3. CPRE and others need to engage in these processes to protect the coast from changes that threaten its beauty, tranquility and diversity. This position statement sets out CPRE's national approach, as a support to our local and regional campaigning and as a point of reference for others who are interested. It focuses on pressures from coastal change and from development, and assumes that CPRE locally will work with or through organisations better placed to lead on other issues such as wildlife or access. The varied coastal landscapes and the different challenges to be faced mean that priorities and approaches will differ around the country. Engaging with local communities to help them to understand and assess the implications of proposed policies will be a key element in CPRE's activities on the coast.

The public policy, planning and management context

4. Knowing which bodies to approach, and when, is critical if communities are to influence decisions. CPRE expects all public authorities, and local authorities in particular, to help those affected to find their way through the maze. The establishment of local coastal or maritime forums, bringing together public authorities, NGOs and community representatives can be effective here. The following information, correct in late 2010, may be helpful to branches.
 - In central government, the main responsibilities lie with:
 - Defra, working through the Environment Agency (coastal defences and realignment), Natural England (environmental assets and designations, and access,) and the new Marine Management Organisation (the marine environment);
 - Department for Communities and Local Government, working through local authorities (local government, communities and planning policies);
 - Department for Culture, Media and Sport, through English Heritage (historic environment).
 - Local planning authorities operate the terrestrial planning system – based on policies set out in Local Development Frameworks (LDFs) – which applies down to Mean Low Water Springs (though the Crown Estate reaches over all land covered by tidal water). Relevant national planning policies are listed in the Annex. A distinctive feature of coastal planning is policy on the relocation of development threatened by coastal change.
 - Local authorities also have responsibility for coastal defences under the 1949 Coast Protection Act, but outside urban areas they have generally handed this over to the Environment Agency (EA) which has prepared Shoreline Management Plans (see below) for coastal 'cells' up to the High Water Mark, based on its knowledge of coastal change processes. The Flood & Water Management Act 2010 gives the EA the same lead role for coastal defence decisions as it already has for fluvial flooding. EA has set up local consultative forums with stakeholder representatives to help it fulfil this role.

5. There are many other bodies with planning and management responsibilities in coastal areas (see the Annex). Many coastal areas, particularly those with spectacular features such as estuaries, beaches/dunes and wildlife reserves have multiple designations. National Park Authorities and AONB Boards are particularly important because so much coastal and estuarial area falls within their responsibilities. Water extraction, sewage treatment, waste management facilities, mineral extraction and agriculture can all have the most profound effects on rivers and estuaries.

Shoreline Management Plans and Coastal Change Management Areas

6. Two elements of the planning framework are particularly important for CPRE: Shoreline Management Plans (SMPs) and Coastal Change Management Areas (CCMAs). The following schematic shows their significance in the planning policy process.

POLICY HIERARCHY		
↓	Step 1	Appraise risk (SMPs)
	Step 2	Identify risk areas (CCMAs)
	Step 3	Avoid risk (No inappropriate development. Vulnerability assessment)
	Step 4	Manage risk (Adaptation and time-limited development)
	Step 5	Mitigate impact (Adaptation strategies)

Adapted from PPS 25 Supplement, Development and Coastal Change: Practice Guide.

Shoreline Management Plans

7. An SMP is a plan for future management of the risks associated with coastal change processes (eg, sea level rise, tidal patterns, wave height, wave direction and the movement of beach and seabed materials), operating up to the High Water Mark. SMPs provide detailed information on the future extent of coastal erosion, and consider the range of feasible coastal management scenarios for each area and their impact in shaping the coastline. An SMP will propose one of the following policies for each policy unit or 'cell' within it: (1) Advance the existing defence line; (2) Hold the existing defence line; (3) No active intervention; (4) Managed realignment.

8. Because SMPs provide the evidence base for decisions in LDFs, ensuring that they take account of issues with which CPRE is concerned is important. The evidence base is primarily scientific, although in such complex matters a degree of uncertainty is clearly present which gets greater through the time periods used: the next 20, 50 and 100 years. Community consultation on draft plans provides the opportunity to influence them and to ensure that relevant environmental, social and economic issues are factored in.

Coastal Change Management Areas

9. Where the SMP evidence indicates that the rates of shoreline change are likely to be significant, the relevant local authority is required by government planning guidance in PPS25 (see Annex) to identify the affected area and designate it as a CCMA. The plans introduced in the CCMA will replace any existing planning policies for integrated coastal zone management, identify the likely timescale for retreat and relocation of activities, and set out measures to maintain the economic viability of affected communities, for example through temporary uses and time-limited developments. This is likely to be most contentious for the holiday accommodation/leisure industry, and especially on coastlines subject to statutory landscape, scientific and wildlife designations. The planning guidance suggests that arguments based on natural environment policies might be outweighed by local socio-economic factors and the cost of alternative sites.

CPRE's response to coastal change

10. CPRE recognises the complexity of the responses to coastal change and welcomes the evidence-based approach being adopted by the government, the Environment Agency and local authorities in reaching conclusions about whether or not to defend individual stretches of the coast.

11. A policy of absolute defence of the whole of the existing coastline is unrealistic. Factors to be weighed in forming views about the acceptability of proposals to abandon or realign defences will include:

- the scientific evidence pointing to increases in the rate of coastal erosion and the incidence of flooding;
- the downsides of man-made defences: apart from cost, creating hard defences in one place can lead to increased erosion in another; and "coastal squeeze" can arise from defences as well as erosion;
- the impacts of change on communities;
- the benefits to natural beauty, wildlife and/or access which may result from abandonment or realignment;
- the extent to which high-quality agricultural land needs to be retained for food production, as opposed to allowing land to revert to marsh or other habitat with wildlife value.

The evidence assembled in support of decisions on managed realignment should therefore bring together all relevant factors and the conclusions should be based on robust methodologies which can be understood by non-experts. Scrutiny of the development of SMPs and CCMA's will be particularly important. CPRE looks to local authorities, on behalf of the communities they serve, to take the lead in facilitating the necessary challenge and assurance.

CPRE's response to development proposals

12. In a densely populated island, albeit one with a long coastline, there will be many pressures for development on the undeveloped coast, no longer precisely defined in planning policies, but essentially rural areas outside settlements. These will come in two main forms:

- proposals for major new infrastructure, including those driven by National Policy Statements (NPS) such as proposals for energy generation and distribution as well as other major infrastructure projects; some of these may be offshore.
- local proposals arising from LDFs, driven for example by the development of tourism, coastal defences, leisure boating, fishing and other economic interests.

13. Proposals for new development on the undeveloped coast should be approved only in the most exceptional circumstances, because of the need to conserve and enhance the beauty and tranquillity of its distinctive landscapes and seascapes. CPRE agrees with government policy that few developments require a coastal location and that LDFs should direct new development to suitable inland or already developed coastal sites. However, if a national need is established for new development which must, for technical reasons, be sited on the coast the design of any such development should (a) fit in with the landscape as far as possible and (b) minimise the land take. Off-shore energy infrastructure developments may not only affect the seascape but also impact on the landscape if the location of their support services and the method of connecting to the land-based grid are not carefully controlled.

14. Development on the previously developed coast raises different issues. Towns and villages where development can occur will usually have been identified in the LDF, as will other smaller settlements where limited development could be accommodated because some service facilities already exist. The policies for the developed coast should be aimed

at improving services and facilities and maintaining the distinctive character and quality of the built environment of existing resorts as the basis for economic diversification and regeneration. Opportunities should be taken to remove or relocate those caravan or mobile home sites which are unsightly, where doing so would restore the natural beauty of the coastline. Well-designed new housing or other buildings, intended to revitalise a coastal community, may be acceptable on the previously developed land. Regeneration of a coastal settlement could be preferable to greenfield development further inland.

Marine and Coastal Access Act 2009

15. The provisions of this legislation are now being implemented. Much is outside the scope of this position statement, but two points are relevant.

- **Access.** Natural England is consulting on a new right of access around the entire coastline of England. CPRE welcomes steps to improve negotiated, well-planned and managed access to our countryside, but will challenge proposals for unsuitable development associated with it, such as poorly-sited or intrusive visitor centres, interpretation panels and other signage. CPRE supports access restrictions to prevent unacceptable harm to wildlife or disturbance to areas with special designations.
- **Marine environment** The Act introduces a new system of marine planning, led by the Marine Management Organisation (MMO). The Marine Policy Statement 2010 makes it clear that there will be interaction with the land planning processes, in the interests of marine businesses and services. .

What you can do

Exert influence through the planning system, for example:

- Ensure that a coastal zone is defined in your authority's LDF and that effective policies for its protection are included, including carrying over any helpful policies included in former Regional Spatial Strategies.
- Identify the SMPs covering the coast in your area (the Environment Agency website has the information). Participate in consultation on SMPs, working with other groups and adjacent CPRE branches if the SMP extends into their territory, preferably as a member of a coastal forum.
- Ensure that emerging LDFs, and any policies for CCMAAs, take account of the SMP evidence and support CPRE's approach to development on coasts and estuaries.
- Wherever possible, oppose planning applications which do not conform to this position statement or with local plan policies (where these are supported by CPRE).

Act jointly with other organisations with coastal interests:

These would include the National Trust, wildlife organisations and civic societies, preferably through membership of a coastal or maritime forum where one exists or involvement in one of the 15 Defra "pathfinder" areas which have been given funds for work on coastal issues. The Government's Big Society agenda may offer other opportunities. The objectives of joint action can include:

- Protect and enhance the unique character, beauty, heritage and biodiversity of the undeveloped coast and coastal waters, and protect the integrity of internationally and nationally important biodiversity sites and sites of geological and geomorphological importance..
- Protect any industrial heritage of seafaring, fishing, mining and processing of minerals.
- Remove or upgrade inappropriate and unsightly existing developments.
- Protect the historic seaside character of coastal settlements and upgrade their town centres and seafronts

- Link your local “Stop the Drop” campaign to the Marine Conservation Society’s Beach Watch group of volunteers who regularly carry out beach clean up.
- Examine the Marine Policy Statement and future region-specific policies for forthcoming policies and proposals for potential impacts on communities and seascapes.

ANNEX

Relevant legislation and guidance

Planning policy processes – Local Development Framework etc – from Planning & Compulsory Purchase Act 2004, amending the Town & Country Planning Act 1990;

Planning control/management - Town & Country Planning Act 1990, as amplified by Regulations, Orders and Circulars

National Planning Statements for major infrastructure projects referable to the Infrastructure Planning Commission

Planning Policy Statements (PPSs replacing PPGs) as the basis for LPA policies, specifically:

- PPS1 – Delivering Sustainable Development (Jan.2005), and Supplement on Climate Change (2007)
- PPS25 – Development & Flood Risk (2006), and Supplement on Development & Coastal Change (March 2010), together with the associated Practice Guide
- PPS consultation draft – ‘Natural & Healthy Environment’ (March 2010): if adopted, will replace *PPS 7 and 9, and PPG 17 and 20*

Management Plans for designated areas - National Parks, AONBs (Heritage Coast) - prepared under CRoW Act 2000 provisions

Flood & Water Management Act 2010

Marine & Coastal Access Act 2009

Natural Environment & Rural Communities Act 2006

Countryside and Rights of Way Act 2000

Water Campaigners' Checklist – a briefing written for CPRE by the Water Volunteers Network April 2009

Potential overlapping designations and plans along the coastal zone

(most significant are shown in bold type)

Regional Spatial Strategy (now discontinued but policies for coast may still be of use)

Local Plan (to be **LDF Core Strategy**) and Community Strategy (*District or Unitary Council*)

National Park/AONBs National Parks are also planning authorities, while an AONB committee can only advise local planning authorities.

Heritage Coast designated areas are now almost all within a National Park or an AONB (*Natural England*).

Catchment flood management plan (*EA, water/drainage utility company/LA*)

Estuary Management Strategies and Plan

Coastal Change Management Area (*District or Unitary Council, into LDF*)

Site of Special Scientific Interest management agreement (*Natural England*)

(marshes) Water Level management plan (*EA/NE/landowners*)

Harbour Act Management Plan and byelaws (*Harbour Trust or Port Authority*)

Public Rights of Way improvement plan (*County or Unitary Council*)

Beach management plan (*County/Districts and landowners*)

Shoreline Management Plan (*coastal defence strategy-District Councils and EA*)

UK Marine Policy Statement (*Defra*) draft July 2010

International designations as SAC, SPA, Ramsar convention inter-tidal.