

8th September, 2009

Department for Environment, Food and Rural Affairs,
Flood Management Division,
Nobel House,
17 Smith Square,
London, SW1P 3JR

Dear Sirs,

Consultation on Coastal Change Policy
June 2009

The Suffolk Preservation Society is the County Branch for the Campaign to Protect Rural England, with a membership of around 2,000. It has receipt of the consultation document on Coastal Change Policy, dated June 2009, and would ask you to take the following comments in to account and to be kept informed on Policy going forward, as a stakeholder.

Whilst this Consultation is targeted mainly at local authorities, who will be fully appraised of the detail of this subject with specific knowledge targets, the Society would nevertheless offer the following comments which are indicated in 'bold quotes'.

Our changing coastline

Shore line Management Plans

2.9 Shoreline Management Plans (SMP) will inform decisions on investment and regional and local spatial planning strategies (RSS and LDFs) to ensure inappropriate development does not take place in areas that are at risk of flooding or erosion either now or in the future.

“The Society would like to see a more robust planning policy with regard to building on flood plain generally. The environment loses to economic development because of the changes to planning policy guidance which strongly supports this drive.”

'Pathfinders'

3.9 Coastal Change Pathfinders will be at the forefront of work to explore approaches which support communities in adapting to coastal change, and making the transition associated with adaptation. This could range from small practical projects to help to maintain beach car parks, to buy and lease back schemes designed to smooth the transition where a property is at risk of being lost in the near future.

“The Society notes that there are examples on the Suffolk coast where homes, farmsteads, agricultural land and businesses may be at risk and where information on compensation has not been available.”

It is noted that you welcome views on these matters and want the lessons learned from Pathfinders (local authorities), and the good practice they generate, to be shared and reviewed to inform development of future policy and guidance.

“Should people who live with coastal erosion problems now contact their local authority without delay?”

It is also noted that the evidence base on this matter will link up with local spatial planning and enable the local community to influence and shape strategic decision-making for their areas. Will this come about through vigorous examination in the Local Development Framework?”

3.19 This consultation considers how to provide appropriate practical support to lessen the burden on individuals when they experience complete loss of their home to coastal erosion. *“The basis of the longstanding policy not to pay compensation for properties lost as a result of coastal erosion is that no-one has the statutory right to flood or erosion protection, and therefore where protection cannot be provided, the homeowner cannot claim compensation.”*

“What is the procedure at the present time for people caught in this dilemma?”

There is currently provision within the existing statutory framework for the Environment Agency to pay compensation where it intentionally reduces the level of protection to coastal property, for example, by lowering or removing defences to help manage the risk elsewhere. Where this is the case a claim for compensation could be made.

“An Inspector at a recent landmark ruling on coastal protection decided that Natural England’s plan to force erosion on coastline farm land and property was against the appellant’s human rights. What would be the situation for property owners along the coastline if government bodies, for a particular reason, wished them to be lost to the sea through managed retreat?”

3.24 Assistance with moving to a new home of up to £1,000, and the costs of demolishing a property is expected to be approximately £3,000 per property is noted.

“What would be the position with, for example, the case of a large farm and out-buildings were the financial support may be inadequate, and the farmer unable to pay the costs involved?”

3.25 Mainstreaming this good practice by giving authorities access to grants for demolition and some moving costs should remove the burden associated with some of the immediate practical difficulties of losing a home as a result of erosion from homeowners.

“This is very helpful but in certain hardship cases the financial assistance may be insufficient. What would be the position of the home-owner in this case?”

Preparing and planning for change

“The Society notes that local authorities will lead the process to support communities in engaging in discussions to plan for coastal change, and that a new draft guidance, which offers help and advice to all partners on how to work with communities on managing coastal change will be forthcoming.

It is noted that, going forward, there needs to be an open and honest debate on what coastal change means, and agreement on the basic problems to be addressed in terms of infrastructure, buildings, habitats and livelihoods. The process of building vision, structures, accountability, trust and responsibilities is a long term one, particularly if partnerships are genuinely community based.”

The East of England Coastal Initiative is a partnership aiming to integrate responses to the twin challenges of coastal change and coastal deprivation facing the region. This initiative will bring together a wide range of government, local councils, non-government, voluntary and business groups. Their combined knowledge and resources will be used to create an effective, stream-lined approach that involves the local communities to tackle some of the economic, social and environmental challenges the coastal area faces, and to build new and sustainable opportunities for coastal communities.

“The Society looks forward to reading the working draft of guidance on how all partners can work together with communities on planning for change, and how to join these discussions up with other planning and funding mechanisms.”

The spatial planning system’s role in responding to coastal change

4.21 **“You state that the current PPG20 adopts a strongly precautionary approach, however, in our experience where economic and business interest is strong, the**

environment loses. The policy balance is in favour of economically driven development which means that this policy needs to be changed if it is to safeguard flood plain and flood risk overall. Development, however, will not be attracted to the coastline in the future, but building on flood plain further in land will be with the new house building forecasts coming forward. How will this be addressed?

Large development needs to be directed to parts of the country that would benefit from economic support, and away from vulnerable areas like flood plain and the coastline.”

5. Managing change

It is noted that the aim of areas affected by coastal change are able to remain places that people want to live and work in, and visit; so that adapting to coastal change and the continuation of vibrant communities are able to go hand in hand. Managing change in a coastal community will affect local buildings and properties, businesses, community and local infrastructure and the natural and historic environment.

“It is a moot point that businesses that provide jobs to a local community and help stimulate the local economy may be dependent on certain local infrastructure being in place.”

Local buildings and properties

5.8 The “permanent” nature of buildings makes them, and the people, businesses or services that they accommodate, particularly vulnerable to the risks of coastal change. As well as the threat of a building eventually being lost as a result of coastal erosion, the prospect of loss can have wider consequences for communities.

5.9 Properties facing an erosion risk can become neglected. This in turn has wider impacts on a community’s vitality, potentially contributing to blight and wider socio-economic problems.

“This is an important matter and there is a need to explore different approaches to reduce the potential for neglect and to thus avoid blight. There must be a sensitive balance between the needs of an individual and the requirement of the community. Funding for change and an understanding approach by those involved in the process for adaptation will be vital.”

Business

5.15 The coastline is home to businesses from a range of industry sectors such as marine, tourism, hospitality, agriculture and the wider rural economy. Close proximity to the

coast is an integral part of many businesses, particularly in the tourism sector, and these may be particularly vulnerable to coastal change.

“Will financial grants be available for *existing* businesses as well as private individuals where it is seen as essential for the local economy and the vitality of the coastal areas to survive in good order, and where finance cannot be found from other sources? How will this be tested?”

Natural and historic environment

“With regard to this section it will be difficult to persuade people that a cherished view, a remote special building or a particular walk may be forfeited to the sea. Everyone understands that the coastline has been eroding and changing over time, particularly the East Coast, but there will be difficulties with areas where there is not a large infrastructure to save, but the landscape is nevertheless important to people. These more difficult examples should not be ignored. Full local debate must take place for all involved to ensure consensus and a sustainable outcome. Involvement from the National Trust, English Nature and English Heritage together with the other Agencies involved, and particularly the local interested parties, must be part of this process.

There has already been conflict along the Suffolk coast between the interests of a private individual, whose livelihood and home is at risk from erosion, and with Natural England requiring a ‘leave to the sea’ policy at an SSSI site to further the knowledge to natural science. These are difficult conflicts to reconcile and each case must be judged by a landscape assessment in tandem with full information and the understanding of the owner’s position, and where full compensation is available, otherwise the courts will set the definitive policy.

On a practical note future public information, and planning policy, will lead people away from buying property and establishing businesses on an eroding coastline, and no doubt schools will encourage young people to consider the problems facing coastline communities, so through education, information and policy over time there will be a move from vulnerable areas without the same dissent. In the meantime, it is appropriate that compensation will allow people to move forward. What will have to be discussed is how communities near the sea want the coastline to look like, and what facilities they think should be available on an eroding coast. Unlike buildings at risk to the sea which can disappear altogether the coastline, up to a point, can and does constantly reform and is still ‘coastline’. However, small coastline businesses will be fewer and many may well disappear if they are at risk without compensation. Where it is seen as a tourism or leisure bonus to have facilities on the coast a financial safety net must be in place. Guidance will be needed to retain some parts of the coastline as vital places to visit, and not appear rundown or neglected.”

The Historic Environment

“It is noted what has been said in this section and this is perhaps one of the most controversial and difficult areas. There are good examples of where buildings have adapted to flooding, particularly in countries where this occurs frequently, but there will undoubtedly be some important buildings at high risk where difficult decisions will need to be made. No doubt, again, English Heritage, with others, will monitor these buildings and confer, but the Society urges that appropriate assessments are carried out to ensure the best outcome for an important building and that it should not rest on cost alone.

In summing up it is essential that rural communities on the coastline do not lose their vitality even though that coastline may be subject to gradual change, and that people continue to maintain, where possible, their enterprising livelihoods. A previously inhabited coastline cannot become a ghost area overnight and any policy to move people away from coastline properties, where there is no imminent danger, should be a phased operation to give opportunity for adjustment. They should not suffer anxiety about their future, or the burden of seeing their home and environment lost without proven evidence and appropriate compensation. Where there is a strong mandate from people to maintain their area they should be given the opportunity to make their case.

It is pertinent to add the contrasting perspectives on coastal erosion between say England the Holland. With climate change, and the requirement to grow more of our own food, we need to be mindful of the full cost of losing land to the sea.”

The Society asks for the foregoing to be taken in to account when assessing how coastal communities can successfully adapt to the impacts of coastal change.

Yours faithfully,

Linda Clapham (Mrs.) for
Suffolk Preservation Society

cc: SPS Trustees

