



Environment
Agency

Shoreline Management Plans

Supplementary guidance for their ongoing
maintenance and delivery

October 2020

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Executive summary

The coast of England is covered by twenty Shoreline Management Plans (SMPs). The current (second generation) SMPs were developed by groups of Risk Management Authorities (RMAs) including the Environment Agency and coastal local authorities, Natural England and other key stakeholders, based upon guidance published by Defra in 2006. Each SMP sets out a preferred plan for long-term sustainable coastal flood and erosion risk management, which supports other coastal planning by providing information on coastal processes and expected changes to them.

All of the SMPs were developed taking account of technical, environmental, social and economic factors, although it was recognised that they would require occasional review and be flexible enough to adapt to new information and changes in legislation, politics and social attitudes. Now, ten to fifteen years since they were produced, a 'refresh' of the SMPs is appropriate. This includes ensuring that the Plans remain up to date in light of any new evidence and that RMAs begin to prepare for policy transitions, planned for many locations from 2025 onward.

Replacing the existing Defra guidance on SMPs is not required but there is a recognition that supplementary guidance would be beneficial to support the SMP Refresh activities and promote consistent application of key principles across SMPs.

This document therefore sets out the principles for moving SMPs forward, as well as describing the tasks and activities for doing so. It includes a series of topic-related sections outlining how to undertake those activities, as well as new guidelines for reporting and communicating the status of the SMP.

This guidance was developed in 2020 to guide further activity for the SMP Refresh project and beyond. Activity during that project has led to updates to management sub-category definitions in section 5.2, and the document was finalised in 2023.

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Contents

Acknowledgements	iv
Contents	v
1 Introduction	1
1.1 Purpose	1
1.2 Background	1
1.3 What is the SMP Refresh?	2
1.4 Structure of this guide	3
2 Relationship to National Strategies	5
2.1 Defra FCERM Policy Statement	5
2.2 Environment Agency FCERM Strategy	6
PART ONE – APPROACH	9
3 Refreshing the SMP	10
3.1 Introduction	10
3.2 The ‘Refresh’ process	10
3.3 The ‘Refresh’ framework	11
3.4 Incorporating a new way of thinking	12
3.5 Implementing the Refresh	13
4 Tasks and activities	16
4.1 Introduction	16
4.2 Addressing findings from the Health Checks	16
4.3 SMP policy review	26
4.4 Keeping the SMP up to date	32
PART TWO – TOPICS	34
5 Policy clarity	35
5.1 Background	35
5.2 Approach	35
5.3 Addressing findings from the Health Check	36
5.4 Addressing SMP policy changes	37
5.5 Policy sub-categories	37
5.6 Management intent	41
5.7 Removing inconsistent use of policy sub-categories	42
6 Management triggers	46
6.1 Definitions and distinctions	46
6.2 Application	46
7 Climate change	50

7.1	Background	50
7.2	Climate change projections	50
7.3	Current incorporation of climate change in SMPs	51
7.4	Addressing findings from the Health Checks	53
7.5	Assessing SMP policy changes	53
8	Funding	55
8.1	General principles	55
8.2	Addressing findings from the Health Checks	56
8.3	Assessing SMP policy changes	56
8.4	Addressing affordability issues	56
8.5	Guidance for high-level affordability assessment	57
9	Links with planning system	61
9.1	General principles	61
9.2	Addressing findings from the Health Checks	64
9.3	Assessing SMP policy changes	64
9.4	Improving communication of coastal risks	64
9.5	Key documents	67
10	Responding to change	69
10.1	Background	69
10.2	Available guidance	69
10.3	Informing this process	70
10.4	Ongoing shoreline management	71
11	Protected sites	72
11.1	Background	72
11.2	Changes in guidance or legislation	72
11.3	Addressing findings from the Health Checks	75
11.4	Assessing SMP policy changes	76
12	Relationship to other plans	83
12.1	Background	83
12.2	River Basin Management Plans	84
12.3	Marine Plans	85
PART THREE – MAINTENANCE		87
13	SMP Status Tracker	88
13.1	Introduction	88
13.2	Requirement	88
13.3	Structure	88
14	Action Plans	91
14.1	Introduction	91
14.2	Format	91

14.3	General principles	91
14.4	Maintaining the Action Plan	92
	References	96
	List of abbreviations	99
	Glossary	101

1 Introduction

1.1 Purpose

This document provides guidance on refreshing Shoreline Management Plans (SMPs) and supplements the existing 2006 SMP guidance (Defra, 2006).

It is aimed at any organisations involved in the governance and maintenance of SMPs, but in particular coastal Risk Management Authorities (RMAs).

The aim of the document is to support these organisations in accommodating and dealing with changes that have arisen since the SMPs were produced, through guidance, rather than explicit instruction.

1.2 Background

Twenty second-generation Shoreline Management Plans (SMPs) were developed between 2006 and 2012 covering the coastline of England (two of which also crossed into Wales). They were developed inclusively and thoroughly by Coastal Groups – strategic partnership bodies of Flood and Coastal Erosion Risk Management (FCERM) RMAs (principally the Environment Agency and Maritime local authorities), government bodies and other stakeholders. SMPs are approved by local councils and finally signed off by the Environment Agency under its Strategic Overview for coastal flood and erosion risk management.

Together the SMPs set out the strategic 100-year direction for coastal management for policy units covering the entire coast, taking climate change into consideration, and based upon agreed objectives subject to high level technical, economic and environmental assessments.

However, the SMPs are now generally between ten and fifteen years old since their final approval. The development of their content dates earlier, on the basis of guidance provided by Defra in 2006 and key earlier evidence packages such as Futurecoast (Halcrow, 2002). Some technical information has since evolved. In addition, local planning decisions, developments or policies have altered the socio-economic or physical geography – or ‘baseline’ - of the coast in some areas. Certain issues have gained profile, with improved evidence surrounding their impact upon the natural environment.

Prompted by a review of the Strategic Overview for the coast, the Environment Agency together with Coastal Groups and other organisations, identified a clear appetite for work to be done on SMPs, but not a fundamental re-writing of the Plans, as would be implied by a third generation of SMPs. Consequently, instead of the 5-10 year ‘review’ recommended by the 2006 Guidance, a ‘Refresh’ was agreed, applying a series of activities towards ensuring that the Plans are up to date, reliable and visible, and that onward maintenance is easier.

A need to replace the existing Defra guidance on SMPs was not identified. There was however a recognition that supplementary guidance would be beneficial, focussing on improving overall quality, deliverability and consistent application of key principles across the SMPs.

There was consensus that SMPs remain *advisory* and not become *statutory*, and the guidance provided by this document should be read in that context.

1.3 What is the SMP Refresh?

We are now approaching the end of epoch 1 (defined in SMPs as 2025) and so are reaching a significant point which will determine how SMPs will achieve the longer-term sustainable plan set out by the SMPs. In many cases this will involve some change in how shoreline management is delivered. To put this into context, the SMPs include the transition from one policy type to another at over 250 locations (out of over 1500 total policy units) during the period currently identified as epoch 2.

Recognising this, a core aim of the SMP Refresh is to provide the RMAs with clear guidance on how to plan for and seek to achieve that transition, accepting where we are now but acknowledging that this needs to happen if the longer-term plan for more sustainable shoreline management set out in the SMPs is going to be delivered. The SMP Refresh is also focussed on improving overall quality, deliverability and consistency, whilst leaving room for local nuance and interpretation of particular issues. The SMP Refresh therefore sets out the way in which the shoreline management process can be progressed and re-invigorated, building on the original guidance provided for SMP development.

To deliver on these objectives, there are several steps forming the key elements to be addressed in the coming years.

Phase 1 of the SMP Refresh (undertaken by Jacobs and Royal HaskoningDHV on behalf of the EA/RMAs) provides the following:

1. A review of how changes, since the development of the second generation SMPs, might be accounted for as SMP management policies are implemented. This provides supplementary Guidance for SMP reviews going forward.
2. A Health Check on each SMP, establishing how any of those changes (in 1 above) may affect SMP management policies, and determining if there are any other potential deliverability issues.
3. A Framework for moving forward and direction to manage the development and implementation of SMPs.

The next steps (**Phase 2** of the SMP Refresh) will primarily be led by RMAs at the SMP level, and include:

4. Deciding what needs to be done for each SMP (informed by the Health Checks, item 2 above).
5. Establishing the specific actions to be taken to move forward (in line with the Guidance and Framework, items 1 and 3 above) and populate the Action Plans.

Moving ahead with and implementing shoreline management planning to transition from epoch 1 to epoch 2 will subsequently include:

6. Proceeding with a review of any 'at risk' policy units (as identified by items 2 and 4, above) consider and make changes to SMP policies if required in line with the procedures set out in this document.
7. Undertaking the various actions identified towards implementing epoch 2 policies.
8. Commencing delivery of the epoch 2 policies in line with the SMP.

The timing of items 6 and 7 will vary depending upon the nature of requirements at the local scale, but it is expected that these would occur over a timeframe of no more than 10 years (i.e. to 2030). Item 8 should commence during this same period but will be

ongoing beyond this timescale, with continual updates to knowledge and information, and keeping the SMP and its policies under regular review.

1.4 Structure of this guide

This guidance document is structured as follows:

- **Part One** sets out the framework for progressing shoreline management and provides the user with an outline of the processes for continuing to deliver the SMP.
- **Part Two** contains updated guidance on specific topics, including what and how to consider and incorporate new information on those.
- **Part Three** provides details on recording the status and actions on the SMP, including an updated action plan format and guidance for its use.

Ahead of those, **section 2** sets out the relationships between sections of this guidance and recently published national strategy.

PART ONE – APPROACH

Section 3 Refreshing the SMP – sets out the principles and framework to now take SMPs forward, retaining a robust foundation for delivering on-going shoreline management.

Section 4 Tasks and activities – provides the steps that those maintaining the SMP will need to consider when addressing the Health Check findings and delivering the SMP Refresh process.

PART TWO – TOPIC SPECIFIC GUIDANCE

Section 5 Policy clarity – provides guidance for improving consistency and clarity of SMP policy and management intent.

Section 6 Management triggers – introduces triggers to support the refreshed SMP process going forward and provides guidance on their use.

Section 7 Climate change – sets out how climate change is, and should be, accounted for within SMPs.

Section 8 Funding – provides guidance to assess if and how funding availability could influence SMP policy delivery.

Section 9 Links with planning system – provides guidance on ensuring appropriate links with land use planning.

Section 10 Responding to change – provides guidance on dealing with the impacts of coastal change (in relation to property loss).

Section 11 Protected sites – provides guidance on how the SMPs need to incorporate new information on protected sites.

Section 12 Other Plans – explains the linkage between SMPs and River Basin Management Plans, Marine Plans and Flood Risk Management Plans.

PART THREE –SMP MAINTENANCE

Section 13 Status Tracker – sets out a template and guidance for recording and maintaining details of any changes made to the SMP.

Section 14 Action Plans – sets out a template and guidance on a new action plan format.

2 Relationship to National Strategies

New national strategy and policy documents have recently been published. The most directly relevant are Defra’s Flood and Coastal Erosion Risk Management (FCERM) Policy Statement and the Environment Agency’s National Flood and Coastal Erosion Risk Management Strategy for England (both July 2020). These also encompass and reference relevant parts of other important policy documents such as Defra’s 25 Year Environment Plan, Government’s National Adaptation Programme and the National Infrastructure Commission’s National Infrastructure Assessment.

The new FCERM Policy Statement and Strategy refer explicitly to the SMP Refresh, and this supplementary guidance is fully aligned with them; their ambitions and actions are embedded throughout this guidance. This section contains a signposting overview to indicate the most important links.

2.1 Defra FCERM Policy Statement

The Policy Statement sets out the following overall goals:

To create a nation more resilient to future flood and coastal erosion risk. In doing so, reduce the risk of harm to people, the environment and the economy.

- *We will be better protected to reduce the likelihood of flooding and coastal erosion.*
- *We will be better prepared to reduce the impacts when flooding does happen*

The Statement elaborates on these goals for five Policy Areas, setting out progress, Government’s vision for the future and actions for relevant topics.

Table identifies the most relevant elements of the five Policy Areas and associated policy actions, and links these to the relevant topics and sections in this supplementary guidance document. The Environment Agency’s work to refresh the technical evidence supporting Shoreline Management Plans, of which this Supplementary Guidance is part, will help inform DEFRA’s commitment to review national policy for the plans under Policy Area V.

Table 2.1 Signposting of Defra Policy Statement

Reference: <i>Policy Area</i>	Relevant Policy Area and action from Defra FCERM Policy Statement (summarised)	Link to SMP topic (section within this guidance document)
<i>I Upgrading and expanding our national flood defences and infrastructure</i>	There is now more funding available, and some further potential changes to outcome measures and partnership funding are announced.	Funding (section Error! Reference source not found.) provides guidance on how to apply a broader assessment of affordability and funding risk when considering SMP policy. This is a flexible approach that can accommodate changes in funding rules.
	Those responsible for assets are expected to invest in maintenance and repairs,	

Table 2.1 Signposting of Defra Policy Statement

Reference: <i>Policy Area</i>	Relevant Policy Area and action from Defra FCERM Policy Statement (summarised)	Link to SMP topic (section within this guidance document)
	and to report regularly about this.	
<i>II Managing the flow of water more effectively</i>		Not directly relevant to SMP.
<i>III Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits</i>	More support for nature-based solutions, and potential use of other schemes (e.g. Nature for Climate Fund, Environmental Land Management scheme) to achieve flood and coastal management benefits.	Protected sites (section 10) discusses the role of SMPs in delivering nature conservation objectives. Funding (section 7) provides guidance on identifying wider beneficiaries when considering funding, which may include those listed.
<i>IV Better preparing our communities</i>	Review of NPPF and CCMA's.	Links with planning system (section 9) provides guidance on how links between SMPs and planning system can be maintained and strengthened. Responding to change (section 10) provides guidance on dealing with the impacts of coastal change (in relation to property loss).
<i>V Enabling more resilient places through a catchment-based approach</i>	Reform local flood and coastal erosion risk planning by 2026. Review national policy for SMPs. Review mechanisms for coastal RMAs to manage the coast.	Refreshing the SMP (section 3) describes the SMP Refresh framework, which is set up to be robust for any changes in role and processes.
	Explore how financial products or services can help managed transition.	Responding to change (section 10) provides guidance on dealing with the impacts of coastal change (in relation to property loss).

2.2 Environment Agency FCERM Strategy

The Strategy's overall vision is 'A nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100'. The Strategy has three long-term ambitions, each underpinned by a number of Strategic Objectives, which are supported by a set of Measures.

Table identifies the most relevant of the five Policy Areas and associated policy actions, and links these to the relevant topics and sections in this supplementary guidance document.

Table 2.2 Signposting of Environment Agency FCERM Strategy

Reference: <i>Long-term ambition / strategic objective</i>	Relevant action from EA FCERM Strategy (summarised)	Link to SMP topic (section within this guidance document)
1. Climate resilient places	1.1 Bolster resilience to flooding and coastal change. This includes a broad portfolio: place making, protect, recover, respond. Enhanced appraisal guidance and Resilience Programme to enable locally fitting solutions.	Policy clarity (section 5) introduces policy sub-categories which will further clarify how SMPs cover the full range of measures, albeit at policy level.
	1.2 RMAs will help places plan and adapt; adaptive pathways.	Management triggers (section 6) introduces a more transparent approach to shoreline management, which will further strengthen the use of SMPs as a tool to help plan and adapt.
	1.2 Reference to SMP refresh and to SMP review planned for 2025.	Refreshing the SMP (section 3) describes the SMP Refresh framework.
	1.3 RMAs will help coastal communities transition and adapt.	Responding to change (section 10) provides guidance on dealing with the impacts of coastal change (in relation to property loss).
	1.4 RMAs will use nature-based solutions and improve the environment; new approaches for conservation of protected sites; FCERM investments to contribute to improving environment and achieving water quality objectives; Local Nature Recovery Strategies that enable habitats to contribute to flood and coastal resilience.	Protected sites (section 10) discusses the role of SMPs in delivering nature conservation objectives.
2. Today's growth and infrastructure resilient in tomorrow's climate	2.1 All development will contribute to resilience; LPAs encouraged to embed SMP policy in spatial plans and to identify CCMAAs. CCMAAs should provide for relocation needs including supporting roll-back. LPAs to identify places which are (expected to become) unsustainable.	Links with planning system (section 9) provides guidance on how links between SMPs and planning system can be maintained and strengthened, with reference to CCMAAs.
	2.2 RMAs will plan all FCERM projects to deliver biodiversity net gain, in line with government's intention to mandate this for certain new developments.	Protected sites (section 10) discusses the role of SMPs in delivering nature conservation objectives, with specific reference to Net Gain.
	2.3 RMAs will identify and support FCERM investments that enable sustainable economic growth.	Refreshing the SMP (section 3) reinforces the aim of SMPs in supporting integrated coastal management which includes

Table 2.2 Signposting of Environment Agency FCERM Strategy

Reference: <i>Long-term ambition / strategic objective</i>	Relevant action from EA FCERM Strategy (summarised)	Link to SMP topic (section within this guidance document)
		economic alongside social and environmental values.
2.5	Flood and coastal defence owners will take responsibility for inspecting and managing their defences	Funding (section Error! Reference source not found.) provides guidance on how to assess if and how funding availability could influence SMP policy delivery.
3. A nation ready to respond and adapt to flooding and coastal change	3.1/ 3.2 People will understand impact of flooding and coastal change and be able to take action.	Responding to change (section 10) provides guidance on communicating the need to respond to change to communities.

PART ONE – APPROACH

Part one sets out the overall approach to be followed in maintaining the SMP:

Section 3	Refreshing the SMP	10
Section 4	Tasks and activities	16

3 Refreshing the SMP

3.1 Introduction

The SMP process is internationally recognised as a sound foundation for sustainable coastal management. Over the last two decades, some good progress has been made in the use of the SMPs, and it is essential to build upon that. However, as the second epoch approaches, new and increasingly difficult challenges will be faced.

This section describes the framework and structure to regain momentum and provide a robust foundation for on-going management while still benefiting from the large amount of information and thought that went into developing the existing SMPs. It describes the basic thinking underpinning the SMP Refresh and the shoreline management process envisaged thereafter.

3.2 The ‘Refresh’ process

The Refresh process builds upon and reinforces the underlying principles set out in the existing 2006 SMP guidance (Defra, 2006). This includes the important distinction made between the broader, higher level shoreline management ambition, “the plan”, and the more unit-specific risk management policies. The 2006 SMP guidance states that:

“The ‘plan’ represents the long-term vision, considering the interactions and implications across the whole SMP and identifies the changes required to achieve that. The ‘policies’ are the means of achieving this plan at the local level over discrete timescales.”

This underlying relationship is maintained within the Refresh, with the focus on achieving the plan using the combination of management policies to progress along the pathway. In doing so, certain points have to be reinforced within the Refresh:

- SMP policies must be considered in the context of the higher-level intent of the plan.
- Individual policies may have to be considered as a geographic suite of policies delivering the intent of the SMP over a broader area.
- “Policy transition” or policy sequencing is part of the progression needed for delivering the plan, not a set of discrete steps but a continuous process.

In relation to this last point the distinction is made between “policy transition” (modifying the way in which or timescale over which we move from one policy to another, but in line with the SMP intent) and “changing policy”, which is the more fundamental process by which there is deviation away from the original intent of the plan.

The SMP continues to provide a ‘road map’ for shoreline management and we are now some way down that road. While important not to lose sight of the long-term plan, the main focus of the Refresh is how to deliver the management policies and decisions that were identified for epoch 2, recognising that there may also be a need for catch-up with respect to some aspects of the epoch 1 management. This is set out in Box .

Box 3.1 Basis of the SMP Refresh

The 2006 SMP Guidance states that although the SMP defines policy solely for FCERM, this has to be fully integrated with the wider issues of coastal management and planning. The SMPs therefore aimed to develop a long-term approach, setting out an on-going continuous framework for shoreline management.

Within this framework broader scale issues of coastal zone management can be considered and addressed in the confidence that they are based upon a sustainable approach to flood and erosion risk management. This clarity about the role of the SMP as part of wider coastal management becomes increasingly pertinent as the process of shoreline management is taken forward:

- To frame the essential conversations with communities about delivering long-term resilience and addressing asset losses.
- In the development of strategies, reviewing and testing assumptions made in the broader scale SMP, but in essence aimed at establishing how in practice the principles and intent set out in the SMP are delivered.
- In maintaining an overall coherence across the whole area of the SMP, recognising broader interaction between flood and coastal erosion risk management, the delivery of socio-economic and environmental ambitions and within the context of any broader Development Planning vision.

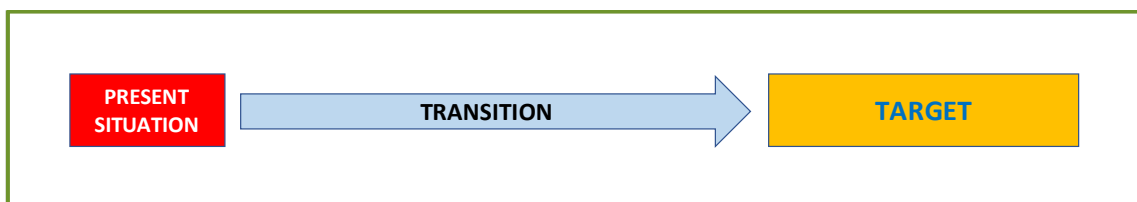
The approach to management presented in the SMP is not set in stone. It must always be anticipated that further information and other influencing factors may result in change to individual policies and even to the plan. Such change may be in geographical extent, over changing timescales or more fundamentally in intent. None of this negates the value or function of the SMP. While maintaining this underlying ability to adjust, the SMP at any point in time provides definitive current thinking as to how shoreline management is taken forward.

The SMP continues to have an important role, but it needs to remain useful to ensure it is used. As such it is essential that the SMP is maintained as a living Plan, as a relevant source of reference and as a starting point or framework within which more detailed management decisions are developed.

As a critical point in the initial SMP timeline is reached, progressing from the short-term (epoch 1), there is the need to review how the shoreline has been managed and how to move forward. It is important to stay ahead of the curve, consciously considering how to deliver on the overall management intent.

3.3 The 'Refresh' framework

The overall intent of the SMP was to move from the present situation towards a more sustainable target for coastal flood and erosion risk management in the future, as illustrated below:

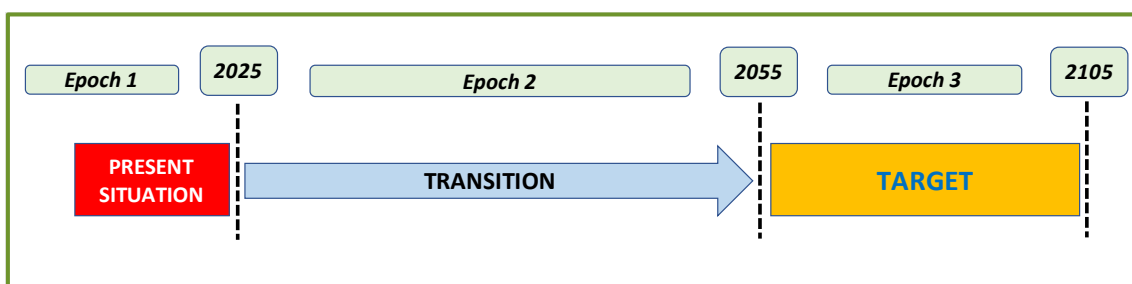


The present state of shoreline management plans can therefore be considered as having the following three basic components:

- a) where we are at the moment;
- b) where we are trying to reach (and why);
- c) how we will transition from 'a' to 'b' (where applicable).

These can be mapped onto the SMP framework as set out in the next graphic. This illustrates that 'where we are at the moment' will generally correspond with the management policy currently being implemented for epoch 1, and 'where we are trying to reach' corresponds with the management policy currently set out for epoch 3.

It highlights the significance of epoch 2 as a key period for establishing how to move (transition) from one state to the other.



The pathway to achieve this is expressed as a sequence of policies, taking shoreline management from now into the future. To move from 'where we are', to 'where we want to reach', was recognised in many cases to require a transition of some sort, as shown above. But even where policy does not explicitly change (for example where policy is HTL, HTL, HTL), there will still be changes in conditions that may require a change in actual management approach, within the context provided by the SMP.

A key principle underpinning the Refresh is that unless there is clear evidence to the contrary emerging from further information, the longer-term management intent defined by the SMP is presumed to remain sensible and appropriate, even if the timing of that and implementation approach may change.

It is also important that present management neither restricts opportunity for change nor raises expectation that how things are now will be how things will always be.

3.4 Incorporating a new way of thinking

In applying the Refresh framework, the following concepts that underpin the SMP process need to be recognised:

- The Refresh framework reinforces the idea that the epochs were set out as broad management periods for the benefit of some consistent overview on shoreline management policy changes, helping to distinguish 'short', 'medium' and 'long' term planning. This aimed to guide, rather than dictate how delivery of the Plan was phased.
- Acknowledging changes in climate (and the uncertainties), social attitudes, funding and wider (non-FCERM) requirements, there has always been the need to be responsive to external factors. This has been increasingly recognised as a key issue.
- If the opportunity arises to reach 'the target' earlier, this may be beneficial. Equally, it may be appropriate to delay policy transition. This could be because

coastal change is slower than expected, its consequences are less severe, or some feature of the coast is more resilient to changing conditions than expected.

- A move from one policy to another is not simply because that is what it says in the SMP, but because of trying to move shoreline management forward in a positive and sustainable way. This is a core principle within the Refresh framework, linking the progression of policy to intent of the SMP.
- Instead of a fixed epoch approach that pins down policy transitions to specific dates (which was never intended) the SMP moves to a more transparent approach, driven by developments that trigger the need for change (imposed) or developments that allow change (opportunity). This trigger approach makes it possible to adapt management in response to new information, while anchoring anticipatory planning to the broader intent of management.

3.5 Implementing the Refresh

3.5.1 Getting 'epoch 2 ready'

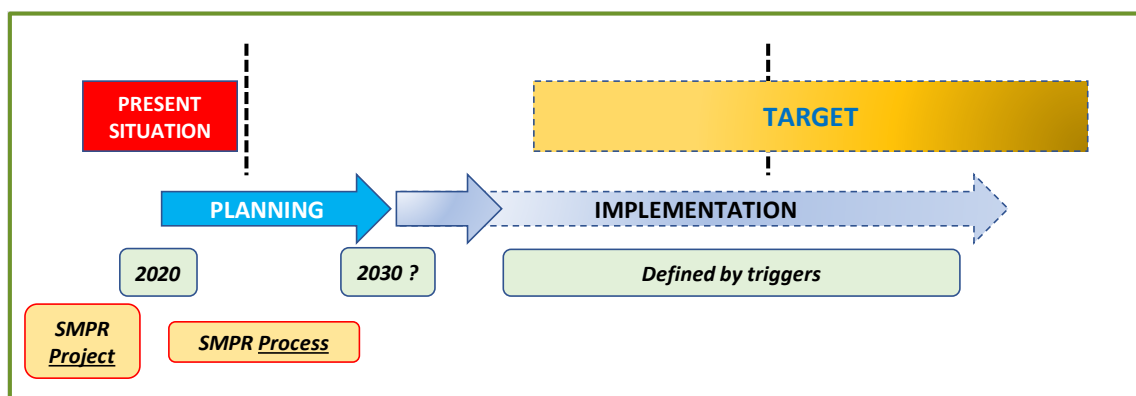
Planning for transitioning policies will require a lot of work, over several years in some instances. In many cases this was expected to occur through epoch 1, but that has not always been the case. Therefore, this needs to begin now.

The Health Checks have identified several next steps (SMP-wide and by policy unit) that should now be considered to move the SMP forward to be 'epoch 2 ready', and should be prioritised within the next decade or so, to 'catch up'.

The Refresh framework focusses on planning for the future so there is also a need to put in place the Action Plans for that same period, and beyond, to capture the requirements for planning and implementing as we move closer to those transitions.

The SMP Refresh also introduces a new approach where this process is driven by the definition of triggers to determine when policy transition will be required.

This Refresh 'process' is illustrated below.



3.5.2 Use of management triggers

Management triggers may be used to define the appropriate timing for policy transition. **Section 6** provides more detailed guidance on the definition and use of triggers, but they are introduced here as an important part of the framework.

Epochs provide a useful broadscale understanding of timescales but remain open to misunderstanding as to when transitioning (or changes) may be required and tend to anchor the whole process to those epoch timescales only.

While not totally abandoning the concept of epochs, in many areas there is a degree of uncertainty as to what drives the need for some form of policy transition, and when the trigger(s) associated with a particular driver will be met.

Trigger Types define what factors drive the proposed change toward the long-term intent of the Plan and **Trigger Points** identify the point in time when that transition needs to be made (see Box).

Box 3.2 Trigger Definitions

In the context of SMPs, the following definitions apply:

- **Trigger Type: a parameter or combination of parameters** which can reach a point where existing policies and responses (e.g. management approaches) would need to transition or change.
- **Trigger Point: the limit (value/occurrence)** relating to the trigger that, once reached, would result in policy transition or change.

Trigger Types may be considered under two broad categories:

- **Physical Processes:** which can be measured and used to determine when an action or change is required.
- **Enablers and Inhibitors:** which can drive, enable or restrict the requirement for action or change.

In summary, the SMP Refresh sets out a four-step process in relation to triggers:

- Review and clarify what the SMP states as being the intent as to why transition is required – define the critical triggers.
- Consider the state that will trigger the transition – define trigger values.
- Assess when these trigger values may be reached, based on current insights, including uncertainty.
- Define the monitoring and associated analysis required for regular review of the predicted timescale for reaching the triggers (a key part of the Action Plan, see **section 14**).
- Consider what actions may be required to enable transition, before and after reaching the triggers (a key part of the Action Plan, see **section 14**).

This process may still be framed within the concepts of epochs, but with a clearer understanding of drivers and associated timescales.

The benefits of this approach are summarised in Box .

Box 3.3 Benefits of Refresh framework approach

The proposed framework for the Refresh maintains the positive planned approach to shoreline management, building from the work already done rather than re-invention. In doing so the framework:

- Looks forward, recognising current state and management of the shoreline but looking forward towards delivering the longer term (epoch 3) outcome. It is based on achieving the longer-term sustainable plan already defined by the SMPs.
- Shifts the sequencing of policies from a seemingly strict definition by epochs, towards a more transparent pathway approach, where, recognising the often complex issues that need to be addressed, change is driven by defined trigger points; still within an indicative structure of epochs.
- Focuses particularly on the transition period defined at present by epoch 2.
- By defining triggers, encourage early planning for transition, enabling involvement of communities in the decision-making process, framed within the longer-term approach defined by the SMP.
- Aims to shift attitudes from one of “when have we got to change” to one of looking for opportunity to change in a positive manner.
- Sets out a longer-term framework that will move from “the Shoreline Management Plan” to ongoing Shoreline Management Planning that will itself be monitored and progressed beyond the period of the Refresh.

4 Tasks and activities

This section sets out the key tasks and activities identified to progress SMPs to be ready for epoch 2.

4.1 Introduction

As highlighted in **section 3**, there is a lot of work to be done in order to get SMPs ready for epoch 2. This is not only the case in areas where a policy transition is needed, but also where there is no change in policy over time.

This guidance is intended for two situations: (1) addressing issues identified in the Health Checks and (2) supporting ongoing shoreline management planning.

The Refresh Health Checks have identified those locations where steps are proposed to progress the SMP, and these findings should be used to focus efforts over the next decade.

Beyond this, the SMP should be continually managed and updated, recognising that shoreline management is a continuous process. Through the approach set out in the Refresh framework (**section 3**), it is possible that there will be additional activities required, beyond those identified by the Health Checks, triggered by future change.

This section sets out the process for:

- Addressing findings from the Health Check reports and taking forward the resulting actions to deliver shoreline management over the coming years;
- Undertaking policy reviews, both as a result of actions taken from above and in response to future change;
- Formalising SMP changes;
- Keeping the SMP up to date.

It is recognised that these activities may require significant resources, and those will need to be identified.

4.2 Addressing findings from the Health Checks

Health Checks have been carried out for all 20 SMPs covering England. Each Health Check provides direction towards delivery of SMP policies and advises on activities needed to address the challenges faced. The focus is on the next 10 to 20 years, and in particular the next steps that need to be considered as part of Phase 2 of the SMP Refresh.

This section provides guidance on how to address the findings from the Health Checks and signposts where this is addressed in more detail for specific topics in the rest of this document.

As explained in **section 1.3**, Phase 2 of the SMP Refresh is primarily for RMAs to take forward at the SMP level. This will involve the following initial steps:

- Establish SMP governance;
- Decide on approach to delivering and maintaining the SMP;

- Review Health Check report 'Next Steps' and prioritise actions;
- Initial discussion around what to do, how to do, how to finance, and who does it;
- Populate Action Plan setting out responsibilities and scheduling.

Following-on from this, the RMAs will need to consider the various actions towards implementing epoch 2 policies. In some locations this could involve undertaking a more detailed review of the policy units to consider making changes to SMP policies if required. This is discussed in **section 4.3**.

A status tracker has been developed, which will facilitate the recording of progress made with respect to the Refresh process and also the recording of changes made to SMP policy. This is discussed in **section 4.4**.

4.2.1 What does the Health Check provide?

For each SMP, every policy unit has been appraised and potential challenges to policy delivery identified. This has been based upon a review of the SMPs and feedback from those involved in SMPs through forums and questionnaire responses. To address these challenges, the Health Check proposes a series of next steps, at both SMP-wide and policy unit level. The sub-sections below provide more detail and guidance for this.

Some of the actions identified as next steps will involve individuals, whilst others will involve a larger number of organisations. But it is expected that an 'SMP Management Group' (**section 4.2.2 (a)**) will co-ordinate and have an oversight of all actions.

4.2.2 Addressing SMP-wide next steps

Whilst the Health Check findings are specific to each SMP, there are commonalities across the SMPs. The sections below address the following common themes:

- Establishing governance and maintenance
- Producing a new Action Plan
- Improving policy clarity
- Engaging planners
- Responding to change and engaging with others
- Addressing changes to the natural environment
- Monitoring and triggers
- Climate change
- Incorporating strategies and other new information

Establishing governance and maintenance

(a) SMP Management Group

A recommendation of the Refresh is the need to reconvene an SMP group for each SMP, to both progress the SMP Refresh through its next stages and keeps the SMP up-to-date in the years that follow, providing a focus for its delivery. This '**SMP Management Group**' equates to the Client Steering Groups which were responsible for developing the SMPs. Note that for some SMPs a group set up to deliver this may

already exist under a different name (e.g. the Project Management Board in the North West)

The composition of each group will vary, but as a minimum should include the Maritime local authorities, Lead Local Flood Authorities (which can be either unitary authorities or county councils), the Environment Agency and Natural England. It may also be beneficial to include other bodies that have a particular interest in the SMP, such as the Marine Management Organisation, National Trust, English Heritage, RSPB and particular community and landowner representatives.

Recognising that many coastal schemes are likely to require funding contributions from non-FCERM sources and that schemes commonly provide multiple benefits, there are advantages in including representatives from other authorities, such as Highways England, Network Rail, utility companies, port authorities and internal drainage boards. These bodies may also be assigned responsibility for undertaking actions identified within the SMP Action Plan.

This is also an opportunity to rekindle or strengthen existing links between the SMP and planners, through incorporating planning authorities in the SMP Management Group. Also see [Engaging planners](#) section below.

Continuity is important but can be difficult due to resource constraints and changes in personnel. Decisions regarding the SMP Management Group make-up needs to take this into account.

In some areas, there may also be a need to re-engage with elected members, particularly as many of these were not involved in the development of the existing SMP and, as such, political 'buy-in' to some SMPs has weakened over time. The 2006 SMP guidance recommended that 'Elected Members Forums' should be established. In some areas these have evolved into Coastal Forums, such as Suffolk Coast Forum, which brings key stakeholders together on a regular basis to consider matters relating the coast in the context of wider integrated coastal zone management. Given that in many areas there is the need for an integrated approach to longer term management, the formation of Coastal Forums should be considered in other areas where they currently do not exist.

The leadership and relationship between Coastal Groups, SMP Management Groups and Coastal Forums is likely to vary across the country and may depend upon: the existing models in operation, the extent to which SMP governance has been retained and local preferences. Coastal Groups should discuss and decide the best fit for SMP governance in their region.

(b) Decide approach to Refresh and ongoing maintenance

A key decision is who will lead and take 'ownership' of the SMP Refresh process within each SMP Management Group. This may depend upon existing governance.

In some regions, partnerships between RMAs have emerged since the SMP, such as Coastal Partnership East, Eastern Solent Coastal Partnership and Dorset Coastal Partnership. These have proved an effective mechanism for maintaining the SMP and providing an essential bridge between the SMP and its use by others, such as the Planning Authority. Along the North West SMP, a dedicated SMP Co-ordinator has been appointed by the Regional Flood and Coastal Committee to support, facilitate and oversee the delivery of sustainable coastal management across the north-west.

Although it may remain appropriate for individual RMAs to undertake particular actions, the SMP Management Group should ensure meetings are held regularly to encourage a strategic approach to planning, delivering, updating and changing actions, rather than a reactive management approach or one that is devolved entirely to a local level.

Producing a new Action Plan

Maintaining the Action Plan plays a key role in maintaining the SMP and ensuring progress is being made in moving toward the end target. This is discussed further in **section 4.4**.

- **Part 3, section 14** also provides further guidance on updating the Action Plans using this template.

Improving policy clarity

Under the 2006 SMP guidance, there were four SMP policies available to shoreline managers: No Active Intervention, Managed Realignment, Hold the Line, and Advance the Line (the last being rarely applied).

There are, however, several instances where there is inconsistency or lack of clarity in the selection of the policy, which can cause mis-interpretation of the management intent leading to that intent being compromised. There is a general need for improved clarity and consistency, in terms of what the policy means at each location, across all SMPs.

- **Part 2, section 5 Policy clarity** sets out the guidance for undertaking this task and advises on how this should be recorded.

Engaging planners

The 2006 SMP guidance recognised a need for improved links with the planning system. Despite this, and the introduction of initiatives such as definition of Coastal Change Management Areas, this remains a need in several SMPs to make sure that local planning authorities use the SMP in setting planning policy and to inform development management. In some areas personnel changes or restructuring since the SMP was developed have diminished links established during the SMP.

There is also a need to highlight that the SMPs remain a 'material consideration' despite the SMP documents themselves being older than the 5-year time limit typically used in Planning.

- **Part 2, section 9 Links with planning system** provides further detail on how links between the SMP and the planning system could be improved.

Responding to change and engaging others

In several SMPs, a need has been identified to review and identify vulnerable communities where a response plan is required, and to establish the resource and information needed to support adequate engagement with these communities.

Engagement with affected communities and businesses is a continual process, reflecting developing attitudes towards coastal change. Also, residents, landowners and businesses may change over time, so existing relationships can be lost.

If major landowners, infrastructure providers and other authorities are not represented on the SMP Management Group (see [Establish governance and maintenance](#) above) then regular engagement is likely to be needed to ensure they remain aware of the SMP policies and their responsibilities. They would also be consulted, along with communities and other parties with an interest in the coast, as part of any SMP policy review.

- **Part 2, section 10 Responding to change** provides direction on adapting to change and engaging with others.

Addressing changes to the natural environment

There have been no changes in policy or guidance on Protected sites that require a blanket change in SMP policy. But across England there have been changes in designated sites since the SMPs, with designation of new sites and extension of existing ones. This includes the introduction of Marine Protected Areas and Marine Conservation Zones (MCZs).

Because designation of new sites post-dates the SMP, the local authorities should have been consulted on those changes so current SMP policies should have been taken into account. It is not therefore recommended that a broad-scale assessment of the impact of existing SMP policies is undertaken retrospectively.

But where changes in SMP policy are identified (as part of the SMP Refresh process or ongoing thereafter) bespoke assessments will be required, as part of the overall SMP policy review process (see **section 4.3**) to ensure the review of policy fully considers the designated sites at that time. Note that in some SMPs the changes in designation cover a number of policy units.

There is also a more general need to improve understanding of future opportunities for intertidal habitat creation and of requirements for compensatory habitat. This requires specific studies in some areas and is identified as an SMP-wide requirement in the relevant Health Checks. These studies should take account of the latest information regarding project sea level rise (see below) and will continue to inform ongoing national reporting to Defra on progress of the HCP every two years.

As part of this, links with the Habitat Compensation Programme (HCP), run by the Environment Agency, should be re-established or improved.

- **Part 2, section 10 Protected sites** provides further guidance on protected sites.
- The UK Government's 25 Year Environment Plan (*A Green Future: Our 25 Year Plan to Improve the Environment*) (Defra, 2019), and in particular the concept of 'net gain' will need to be considered by all those implementing shoreline management planning. Defra's FCERM Policy Statement (Defra, 2020) suggests that this could become a direct driver for FCERM investment. This is likely to be more appropriate to address when projects arising from the SMP come to be developed and delivered, rather than having a direct bearing on selection of appropriate SMP policy as part of any SMP policy review.

Management triggers

As discussed in **section 3**, in all SMPs, there are benefits of adjusting from a strict epoch approach to a more transparent approach. This will be achieved through the identification of triggers to inform policy transitioning and provide greater transparency on the timing of that change, albeit still within the broad framework of epochs.

Initially it is recommended that these are defined for all policy units where there is a planned policy transition (a change from one policy to another over time), but the concept can be applied throughout.

- **Part 2, section 6 Management triggers** provides more detailed guidance on the use and definition of management triggers.

Monitoring

Significant progress has been made to improve the collection of monitoring data since the SMPs were developed, through the establishment of a national network of Regional Coastal Monitoring Programmes covering the coastline of England. The Network

comprises six Regional Programmes, funded by Defra, collecting coastal monitoring data in a co-ordinated and systematic manner.

There is already good collaboration between shoreline managers and the Regional Coastal Monitoring Programme, but there are locations where use of these data sets in making SMP-level decisions should be improved.

It is important that the link between monitoring and the SMPs is maintained and developed further, for example through particular members of the SMP Management Groups sitting on the Monitoring Programme Project Board. This will ensure the programmes remain relevant to the SMP and shoreline management process and responsive to its needs.

It is recommended that following identification of triggers and management indicators (see above), the monitoring programmes are reviewed to ensure that they still provide the data required to inform trigger assessments. As part of this, there will be a need for regular and focused analysis to translate monitored data into information that can support SMP-level decision-making.

Climate change

New climate projections for the UK were published in November 2018 and are referred to as UKCP18. SMP policy along most of the coast is unlikely to be affected by these new data, as existing FCERM guidance applied in SMP development covers the range of projections in UKCP18. As such it is not considered necessary for a wholesale reconsideration of the policies contained in the SMPs. But UKCP18 does confirm long-term sea level rise with projections to the year 2300, meaning future shoreline management intent must be flexible to higher levels of sea level rise, beyond current guidance. This will need to be considered in any policy review.

Climate change projections affect other data sets, such as (1) estimating habitat loss/gain and compensatory needs and (2) calculation of benefits as part of any economic assessment. Any reappraisal of these will need to use the latest projections. Similarly, the latest information needs to be used in setting triggers for policy change (see above).

- **Part 2, section 7 Climate change** provides specific advice on what the changes in climate change projections mean for SMPs.

Incorporating strategies and other new information

Since the SMPs were completed, a number of schemes and strategies have been completed.

The Health Checks have highlighted that the relationship between the SMP and strategies is not universally understood, and that in some instances it has been incorrectly assumed that a strategy automatically supersedes the SMP. Whilst it is possible that there is a need to alter the SMP policy this should not be done in isolation nor should conclusions of strategies simply be incorporated into the SMP.

Where the outcomes are in-line with the SMP policy, no further direct action may be required, apart from ensuring that any more recent and better information is considered in any future SMP review.

Where strategies and schemes have altered the SMP policy or where new evidence from these may affect long-term management, there is a need to revisit the SMP. By their nature, schemes and strategies are typically more narrowly focused: potentially, the changes to policy described therein have not been subject to the same range of strategic considerations the SMP entails, to ensure the implications do not compromise the stated long-term, wider-scale and multisectoral sustainable policy direction.

The SMP Management Group should therefore examine the basis for decisions within the strategy to determine whether the difference in conclusion is a result of new information since the SMP, or a result of different criteria being used by the strategy, and the implications of this. There also needs to be a check that broader scale issues have been considered in developing the strategy. In this way, the broader sustainability of coastal strategies can be scrutinised in line with the SMP Policy Review Process, using guidance set out below in **section 4.3**. If it is concluded that the strategy conclusions are justified in this context, a formal change of the SMP policy can be made. Otherwise the policy should remain that set by the SMP, considering implications of this for the strategy (including other areas and associated investment plans). The SMP remains the reference point for use in shoreline management decisions, for example for scheme development and within the planning system.

Where changes in SMP policy are made as part of the SMP Refresh process or ongoing thereafter, new information from strategies should be used as part of the appraisal (see **section 4.3**).

In some locations, policy has already been reviewed, following the formal SMP Change Process. It is important that these updates (past or future) are clearly recorded within or linked to the SMP documents (using the SMP Status Tracker, see **section 13**). There will be new procedures for this to accompany the development of an updatable web version of the SMPs.

4.2.3 Addressing policy unit next steps

A series of checks have been applied to every policy unit within each SMP (Box 4.1). A screening process has been used to identify the policy units where specific checks are applicable.

Box 4.1 Series of checks considered in the Health Checks

Policy Change

1. **Change in Applied Policy:** A check on whether actual practice differs from that identified in the SMP
2. **Policy Qualified:** A check on whether the SMP policy for epoch 2 was stated to be conditional or qualified and whether that uncertainty can now be removed or has reduced

Policy Implementation

3. **Transitional Policy:** A check on whether the preparations have been made for transitioning of management policy in epoch 2
4. **Policy Clarity:** A check on whether there has/could be misinterpretation of the SMP policy and whether policy requires better clarification

Physical Factors

5. **Coastal Processes:** A check whether coastal processes/evolution has altered from that expected by the SMP and whether that could have implications for delivering policy
6. **Defence Robustness:** A check whether assumptions regarding defence robustness in epoch 2 were critical to selection of SMP policy and whether assumptions remain valid
7. **Changing Practice:** A check whether it is expected that SMP policy to actively move away from providing defence could be resisted and affect ability to deliver policy

Funding Requirement

8. **Funding Dependency:** A check whether the epoch 2 policy identified in the SMP was conditional on non-FCERM GiA funding as a primary source and whether steps have been taken to secure that
9. **Change in Funding:** A check whether a known change in funding is now expected to alter the SMP stated policy for epoch 2

Plans, Planning and Adaptation

10. **Development Conflict:** A check whether development taking place/planned is in conflict with SMP policy
11. **Adaptation:** A check whether adaptation plans have been developed to deal with expected losses of property and other features in epoch 2

Natural Environment

12. **Change to Designated Sites:** A check whether more recent changes made to designated sites could have implications for delivering SMP policy
13. **Delivering Environmental Requirements:** A check whether environmental requirements are being delivered in practice or affecting the ability to deliver the SMP policy

Other

14. **Other Matters:** Any other matters identified requiring further attention, not fitting into one of the above checks

Where a check has been identified the Health Check suggests the next steps to be considered. These have been broadly classified as:

- **Amendments** – where there is a need to update/provide more information to provide more clarity or to keep the knowledge base up to date.
- **Action Planning** – where there is a need to include certain types of action in the new Action Plan to address the finding of the check and implement policy.
- **Revisit SMP Policy** – where there might be a need for the SMP Management Group to reconsider the suitability of the stated policy.
- **Remain Aware** – where there is no immediate response needed during Phase 2 of the SMP Refresh, but consideration is likely to still be required within the next decade or so.

The sections below discuss each category in turn.

Amendments

The majority of Amendments relate to policy clarity and need to redefine or clarify the headline policy.

- **Part 2, section 5 Policy clarity** provides guidance for undertaking this task.

There are also locations where a change in policy unit boundaries should be considered. This may be due to changes in risk or assets at risk since the SMP, or where a single policy has been used across a frontage where there are varying issues.

Amending policy unit boundaries may require the formal change process to be followed (see **section 4.3**). This will depend upon the specific circumstance and a decision will need to be made regarding whether the change means the intent of the SMP will

change. This should consider whether there are likely to be implications both locally or on adjacent frontages and whether the implementation of policy will be affected.

Amendments are also required when SMP policy has already been changed, following the formal policy change process, but SMP documents have not yet been updated.

Going forward, changes should be recorded using the SMP Status Tracker (see **section 13**) and included on the new digital platform once available.

Action Planning

The Health Checks indicate the type of activity required for each instance where this is a suggested next step. The 'Findings' and 'Implications' columns also provide additional information on why a particular activity is suggested.

This category incorporates a range of different activities to enable progression of the SMP policy. The type of activity suggested broadly falls under the following themes:

Further studies - These may be studies that were recommended by the SMP and not yet undertaken or new studies that are required to confirm the appropriate policy or timing of policy. This also includes the need for a strategy study to confirm how policies will be implemented. Initial actions should include clearly a definition of the outputs that the studies need to produce to inform decisions on policy or its delivery, followed by scoping and undertaking.

Findings from these studies may lead to a follow-on need to Revisit SMP Policy (see below). Where no change in policy is required the outcome of studies should be recorded in the Action Plan when the action is marked as complete.

Definition of triggers - See **section 3.4** for the rationale behind a trigger-based approach.

- **Part 2, section 6 Management triggers** provides more detailed guidance on the use and definition of management indicators and trigger points.

Funding - In some locations, progressing the SMP may require a funding plan to be developed to identify potential funding streams and funding partners. In other cases, funding availability can be such a challenge that there is a need to assess the risk to policy implementation, potentially leading to Revisit SMP Policy (see below).

- **Part 2, section 8 Funding** provides further guidance on funding.

Engaging others - This includes situations where there is a need to continue or reopen engagement with communities, landowners, businesses, infrastructure providers and regulatory bodies. This may be to raise awareness and communicate the intent of the plan, to discuss how to facilitate policy transition or to decide upon future policy implementation. Experience from previous consultations will help define the most appropriate approach to engaging others and this will also depend upon the anticipated response and feedback.

- **Part 2, section 9 Links with planning system** provides guidance on engaging with planners.
- **Part 2, section 10 Responding to change** provides more information on adapting to change and engaging with others.

Response planning - In planning for future policy transition, detailed response planning may be required in some policy units. This is likely to bring together a range of stakeholders, with engagement a core part of the process.

- **Part 2, section 10 Responding to change** provides more information on adapting to change and engaging with others.

Review of strategies, schemes and other projects - Where additional studies, strategies or schemes have been undertaken since the SMP there may be a need to review these to check compatibility with the intent of the SMP. Where it is identified that outcomes are not compatible, further steps may be required to Revisit SMP Policy (see below).

Also see **Incorporating strategies and new information in section 4.2.2.**

Impacts on designated sites - Although a national assessment of the impact of existing SMP policies on new environmental designations is not considered necessary, the Health Check has identified that some policies may be sensitive to a change that has occurred in the designation of a site. These locations may require a bespoke assessment of whether designation changes have a consequence for SMP policy. Subsequent actions will depend upon the outcome of the assessment.

- **Part 2, section 10 Protected sites** provides further guidance on protected sites.

Monitoring - In some locations additional understanding of coastal change or risk from coastal flooding and erosion is required to support decision-making. In many cases this requirement needs to be considered by the regional monitoring programmes. But there are some locations where a site-specific study may be required (see **Further studies** above).

Also see **Monitoring** in **section 4.2.2.**

Revisit SMP Policy

The Health Checks recognise that at some locations there may be a need to revisit SMP Policy due to changes in circumstances since the SMP. This may relate to coastal processes, funding, environmental status or changes in risk, for example due to a change in land use. This includes locations where the Health Check highlights that the outcome or conclusions of ‘Action Planning’ activities may lead to that need to revisit policy.

In these instances, the SMP Management Group will need to decide whether there is a need to follow a formal policy review process or whether the changes can be

addressed through amendments to the SMP document. **Section 4.3** below provides further guidance on determining whether a policy review may be required.

There are also policy units where the outcome of a strategy differs from the SMP. Following re-examination of the strategy documents it may be concluded that a policy review is required (see **section 4.3.2**).

4.3 SMP policy review

This section sets out the activities that are generally going to be required if a change in SMP policy is to be considered. It complements updated Environment Agency guidance on procedures for making changes to adopted SMPs. The former 'minor', 'moderate' and 'major' change classifications previously used are no longer applied. Changes to the SMP will instead be considered under two simple categories; those that require a formal review and those which don't. Both are explained in this section.

4.3.1 Changes to the SMP

Reasons for reviewing SMP policy

Policy review and change is a mechanism for ensuring that SMP policies remain appropriate, based on the best available information and guidance.

Both as part of the SMP Refresh process or subsequently, there may be a need to review policy because:

- Existing policy is conditional on other influences, which have now been resolved.
- There has been a change in coastal behaviour, or understanding of coastal behaviour, from that assumed by the SMP, which is expected to affect how the coast will change in the long-term.
- Strategies and schemes highlight new evidence that challenge the SMP policy.
- There has been a significant change in assets at risk from coastal erosion or flooding. This may be due to an extreme weather event or as a result of a change in land use since the SMP.
- Changes in designated sites, including new evidence on site condition or impacts, means implementation of policy is unlikely to be environmentally acceptable and /or legal.
- There are significant changes in government policy, such as funding, spatial planning, funding for response plans, environmental targets, that mean the policy has become either untenable or less attractive than alternative approaches.
- There are significant changes in climate and sea level, beyond those anticipated by the SMP.
- Actual management differs from the SMP policy (e.g. HTL rather than MR).
- Management is in accordance with policy (e.g. HTL), but implementation method is different from the approach identified in the SMP and this is expected to affect the long-term target outcome for other policy units (e.g. by disrupting sediment movement).

The review process is set out in **section 4.3.2**.

Other changes to the SMP

The following changes will not require a formal policy review (previously referred to as 'minor' changes):

- Updates made to Action Plans.
- Clarifications to policy wording that do not change meaning or intent of the SMP.
- Updates to mapping, although where these mean a significant change in assets at risk a decision may be made to review policy.
- Changes in the timing of policy transition due to management triggers (see **section 3**) being experienced earlier or later than predicted - as long as the target outcome of the SMP does not change. However, where timing changes substantially across epochs (e.g. by several decades), or is due to newly introduced management triggers, this should be treated as a policy review (**section 4.3.2**).
- Changes to SMP governance structure.

Recording these changes is critical to maintaining the SMPs as relevant and up to date documents. Changes other than those to Actions Plans should be recorded using the SMP Status Tracker and included on the new digital platform once available. See **section 4.4** and **section 13** for further guidance.

4.3.2 Policy review process

Reviewing SMP policy needs to follow similar steps to those required when SMP policy was developed, as set out in the 2006 SMP guidance (volume 2, stage 2).

The level of input should be proportionate to the issue being addressed and a phased approach may be appropriate, for example involving an initial scoping stage. The rationale for a phased approach is that further assessments, such as requirements for a Habitats Regulations Assessment, may depend upon whether a change in policy is concluded as the preferred approach. In general, the following tasks will be required, as shown in Figure 4.1.

Although a private landowner or organisation from outside of the SMP Management Group might propose a review of policy, this should be for one of the reasons listed in **section 4.3.1**, so there is a clear and auditable trail, and that review will still need to include all of the same tasks set out in this section. The extent and scope of this are expected to need agreement from members of the SMP Management Group, to satisfy them on the appropriateness and robustness of the assessments being undertaken and how the cost of those will be met.

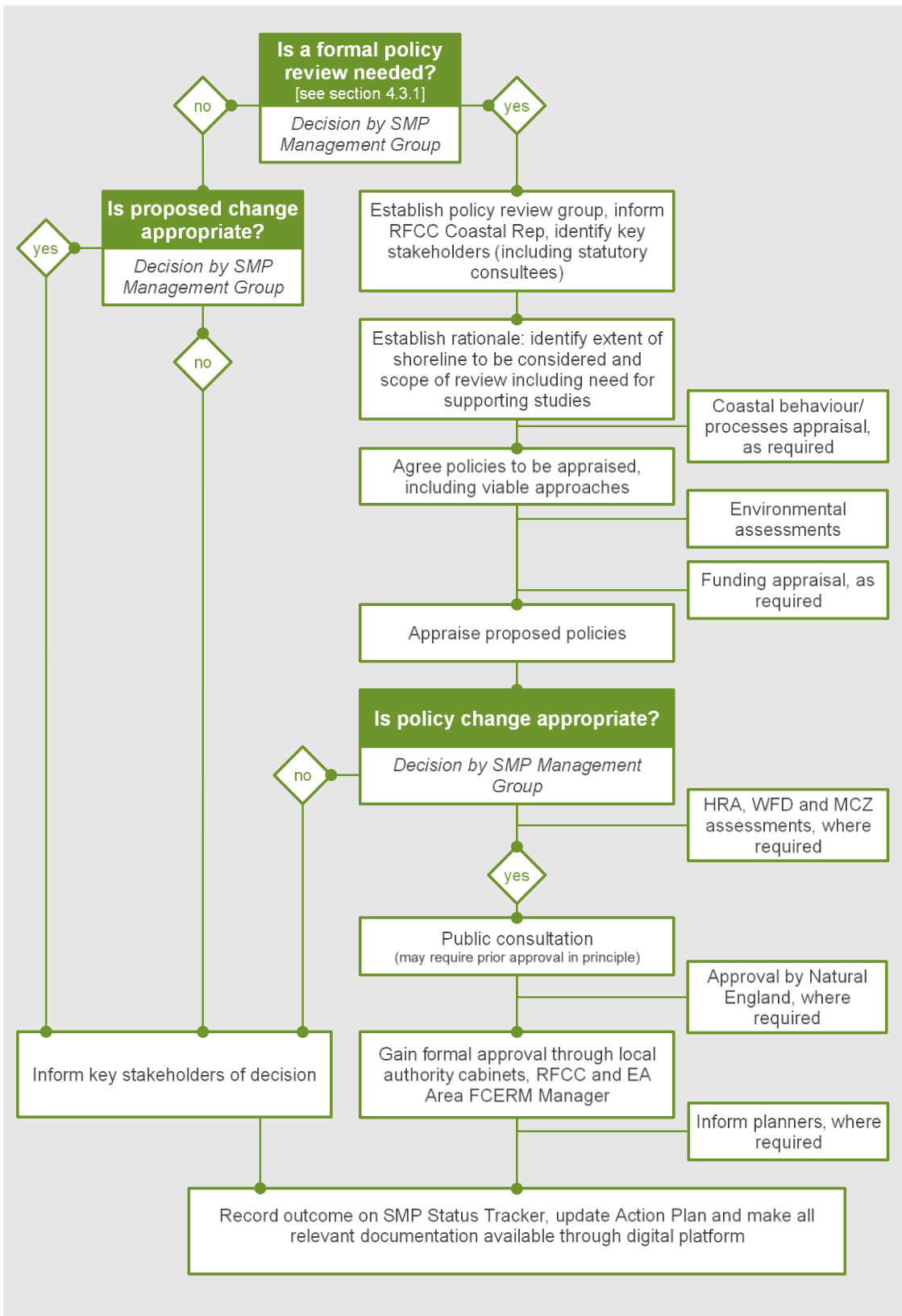


Figure 4.1 SMP Policy review process

Agree governance

Dependent upon the policy unit or units being reviewed, it may be appropriate to establish a specific **policy review group** to lead the process, which may be a subset of the SMP Management Group. As the RFCC will need to approve policy changes, the RFCC Coastal Representative should be informed of the review and its progress, and may wish to join the policy review group. A lead authority will also need to be decided for any grant aid submission and project management for the review. A second consideration is who will undertake the policy review (or appraise it in the case of any third-party proposal). It may be undertaken internally by the decision-making authorities in the SMP Management Group or the steering group may decide to procure external services.

It is also important at this stage to determine key stakeholders who may be affected by the final decision. It is recommended that there is early engagement as part of the review process and, in some situations, it may be appropriate to involve community groups and local stakeholders as part of the policy review group.

Establish rationale

Clearly identify why a policy review is required and the objectives for changing policy. This should make specific reference back to the policy statement and supporting information. At this stage it is important to establish the extent of shoreline that should be considered, which in most cases will need to be more extensive than the policy unit or units being reviewed in order to consider impacts on adjacent shorelines and environmental features. Critical dependencies should be flagged up.

Understanding of coastal behaviour and dynamics

Depending upon the nature of the policy review, it is likely that some further appraisal of coastal behaviour and dynamics will be required. At the simplest level this should confirm whether there have been significant changes since the SMP, or whether trends of change have remained the same. This should use data from the Regional Coastal Monitoring Programmes. In some cases, the need for a policy review may be due to the outcome of further studies.

If there have been significant changes since the SMP, further data collation and analysis may be required to support the policy appraisals. However, these should remain appropriate to the strategic nature of the review and it must be considered whether they are absolutely necessary. If required, these could be commissioned ahead of the SMP policy review.

Note that this task may already have been undertaken as part of a strategy or scheme that instigated the policy review.

Development and technical assessment of alternative options

It is important that in considering the policy categories, potentially viable approaches to delivering these are identified. Also see 2006 SMP guidance (volume 2, task 3.2a). Different approaches can have a significant influence upon the impact that the policy has on local features and on adjacent frontages and therefore whether it achieves the objectives for each location. The triggers for and expected timing of any policy transitions must also be considered.

As set out in the 2006 SMP guidance (volume 2, task 3.1b), it may be possible to screen out policies as part of an initial review.

The technical viability of the proposed policy category should be considered, in terms of both potential engineering issues with the typical implementation approach and its

potential consequences on shoreline dynamics. This should consider implications for adjacent policy units, especially where the consequences of any actions could affect the sediment regime along the coast or result in changes to erosion or flood risk elsewhere as a result of the proposed policy.

The implications of future climate change and accelerated sea level rise on the long-term implications, sustainability and viability of the options should also be carefully considered.

- **Part 2, section 5 Policy clarity** should be used in defining alternative options.
- **Part 2, section 7 Climate change** explains the latest projections and how these should be considered by SMPs.

Options for the intent also need to be compatible with the Local Planning Authority ambitions for future land use and its Local Plan policies, carefully considering their particular timescales. This requires close engagement with the Planning Officers.

- **Part 2, section 9 Links with planning system** provides more information on maintaining and strengthening links with the planning system.

Note that this task may already have been undertaken as part of a strategy or scheme that instigated the policy review.

Environmental Assessment

Early consultation with Natural England is recommended to decide the best approach to the environmental assessments. It is important that the Environmental Assessment should remain focussed and proportionate, with reporting at an equivalent level to the existing SMP SEA. Although there is no legal requirement to apply the 'SEA Regulations' to SMP, best practice guidelines support the preparation of a voluntary SEA for SMPs.

Due to changes that have occurred since the SMP it is likely that new baseline information will need to be collected as part of a scoping stage. However, the existing SEA may still be relevant in developing the scope of an environmental assessment and in identifying the SEA objectives and should be reviewed as part of this stage.

A decision will also need to be made regarding whether the assessment methodology presented in the existing SEA should be used. The advantage of doing so is that direct comparison can be made with other areas within the SMP.

Additional assessments may also be required, such as a Heritage Impact Assessment and Landscape Assessments. These decisions should be made through consultation with statutory consultees at a scoping stage.

Should a change in policy be concluded, a **Habitat Regulations Assessment** will be required if the policy unit or units lie within or adjacent to European conservation sites, or are otherwise functionally linked to them (through sediment pathways for example). A preliminary **Water Framework Directive assessment** and **Marine Conservation Zone assessment** will also be required. These must use the most up to date information available, which will involve the collection of new baseline data.

Dependent on the conclusions of the Habitat Regulations Assessment Screening an 'Appropriate Assessment' and subsequent assessment of imperative reasons of overriding public interest (IROPI) may be required.

- **Part 2, section 10 Protected sites** provides further guidance on protected sites on how the SMPs need to consider them.

- **Part 2, section 12.2** provides further guidance on the WFD assessment required as part of policy reviews.
- **Part 2, section 11.4.3** provides further guidance on the MCZ assessment required as part of policy reviews.

Note that these tasks may already have been undertaken as part of a strategy or scheme that instigated the policy review.

Validation of policy based on funding risk

FCERM economics should not drive SMP policy selection, but where costs are going to be incurred in the near future (i.e. over a 10 to 20 year time horizon), it will be important to validate that funding is likely to be available. This includes a broad estimate of costs and an initial identification of potential funding sources (FCERM GiA and others), including an assessment of their scale and likelihood.

- **Part 2, section 8** provides further direction on the Funding Risk Assessment to be carried out as part of policy review.

Confirmation that policy change is appropriate

Based on the outcome of the studies above, the policy review group will need to decide whether a change in policy is appropriate. This should consider any precedents that a change may create, both locally and nationally.

Governance procedures may vary between SMPs, but it may be necessary to have approval in principle before public consultation. This may involve consulting elected Council members and the Regional Flood Defence Committee at this stage.

It is also important that all decisions are agreed by the wider SMP Management Group, to ensure that the SMP remains a cohesive document and actions do not become devolved to individual operating authorities.

Public consultation

If a change in policy is concluded, community and stakeholder consultation should be carried out prior to the proposed policy change being submitted for approval. The type and extent of consultation will vary depending on the location and the nature of change, but is likely to include the wider public, including individuals, community or interest groups and impacted Parish Councils.

The outcome of the consultation should be used to make any revisions to the proposed policy change.

Approval

It is important that changes to SMP policy are formally agreed and reported. The approval process involving officer and elected member approval will vary between SMPs and local authorities.

Policy changes must be approved by the relevant Regional Flood and Coastal Committee (RFCC), or a delegated sub-group of it, and finally by the Environment Agency Area FCERM Manager.

All policy changes that could impact on a nationally or internationally designated nature conservation site must be approved by Natural England, which will occur through the HRA process.

Updating the SMP to reflect policy changes

This will involve the following activities:

- Define new policy in line with guidance in **section 5**.
- Update SMP Status Tracker – see **section 4.4** and **section 13**.
- Make all relevant documentation associated with the policy change available through the digital platform.
- Update Action Plan (see **section 4.4** and **section 14**) – this will involve setting the policy review action as complete but also identifying any new actions required to implement the revised policy, including any triggers.
- Inform planners – it is key that any changes that could have an impact on the planning system are communicated to planners. This may be through their involvement in the SMP Management Group.

4.4 Keeping the SMP up to date

4.4.1 SMP Status Tracker

The Health Checks have demonstrated that it has not always been easy to establish if information contained within the published SMP document is current or not, whether any policy details have changed, or whether any strategic-level activities are underway that might have a bearing on the SMP in future.

To maintain details on the status of the SMP, this guidance introduces the Status Tracker (see **section 13**), designed to maintain a record of changes made to policy, updates to the documentation, and where activities are underway to progress or consider policy matters. This is intended to supplement rather than replicate the SMP, providing a high-level summary that can be shared and accessed by a wide range of non-technical stakeholders as well as those charged with maintaining the SMP.

This becomes especially important following the Health Checks where a series of steps have been identified for several policy units. It will continue to be important as the SMP is maintained and actions progressed as part of ongoing shoreline management planning in the coming years.

This should be maintained by the SMP Management Group on a regular basis as and when any changes or updates occur, and as a minimum reviewed annually.

The status tracker approach will be incorporated into the new digital platform for SMPs.

4.4.2 Action Plans

Action Plans set out the strategic actions that are needed to progress the SMP and as such there is an initial need to incorporate the additional actions identified by the Health Checks.

Going forward the Action Plan should be seen as a useful tool that can be continually updated to ensure proactive shoreline management planning. A new Action Plan template has been developed as part of this project, this is explained in **section 14**.

It is also an opportunity to consider and refresh the actions already included in existing Action Plans, the Health Checks identifying that the maintenance and updating of some has lapsed, or in some cases the existing Action Plan was considered to be 'complete'.

Those actions that remain 'live' need to be captured in the new Action Plan as part of the Refresh.

PART TWO – TOPICS

Part two comprises a series of sections which contain specific guidance on the following core topics:

Section 5	Policy clarity	35
Section 6	Management triggers	46
Section 7	Climate change	50
Section 7	Funding	55
Section 9	Links with planning system	61
Section 10	Responding to change	69
Section 11	Protected sites	72
Section 12	Relationship to other plans	83

5 Policy clarity

This section sets out guidance on how to improve clarity of SMP management policy, through (1) assigning sub-categories to existing policy units and (2) producing summary statements of management intent.

5.1 Background

Under the 2006 SMP guidance, the preferred policy for each of the management units across every SMP has been identified under one of four basic headline categories:

- No Active Intervention (NAI)
- Hold the Line (HTL)
- Managed Realignment (MR)
- Advance the Line (ATL), although this is rarely applied.

While the application of the 2006 SMP guidance was intended to reduce inconsistencies between SMP documents, the Health Check assessments have reinforced a view that there are still many cases where these four basic descriptors have unintentionally created more uncertainty and misinterpretation of intent in many instances. Experience shows that sometimes the policy headline is the only piece of information within the SMPs that many parties look at. This headline is open to interpretation, and without reference to the accompanying policy statement does not convey the underlying rationale why that policy may have been set.

This guidance aims to improve understanding of what is proposed to be delivered and what that is intended to achieve. This will support a better overall understanding of policies in the context of on-going management. In order to achieve this, policy definition and description will need to become clearer and more consistent.

This is considered essential in communicating the intent of future management to affected communities and local businesses, those funding that management, and those involved in regulating development and planning future land use.

5.2 Approach

5.2.1 Components

The approach to achieving that improved clarity and consistency has two components:

- Adding of sub-categories to better describe the policy, focussed on the broad approach to delivery. This will provide greater clarity on what the intended approach is for each policy unit (**section 5.5**).
- Clarifying the narrative that describes the management intent that the suite of policies is designed to deliver. This should be a few words which capture the critical considerations at each location (**section 5.6**).

This information is to be captured in a readily accessible form that can be used to communicate the intent of the SMP to a wider audience.

5.2.2 Timeline

In line with the principles of the SMP Refresh to move towards a more flexible trigger-based approach to policy transition and change, rather than rigid adherence to epochs, and also recognising that the end of the first epoch will shortly be reached, the updated definitions can be captured as follows:

- Present – the present-day policy being applied (generally what is currently stated in the SMP for epoch 1, or as changed formally since then);
- Intermediate – the stage between present day and future target (see below), which may reflect a transition (this will generally be what is currently stated in the SMP for epoch 2);
- Target – the long-term policy that will be achieved by following the plan (generally what is currently stated in the SMP for epoch 3).

5.3 Addressing findings from the Health Check

5.3.1 Assign sub-categories

The extended descriptors (sub-categories) are to be initially applied to all policy units across all SMPs. It is recommended that this is carried out as a single SMP-wide activity for the purpose of providing greater clarity and consistency in their application.

The tables in **section 5.5** provide details of the sub-categories to be used and guidance on how those are to be mapped onto the existing SMP policies.

The aim of the initial exercise is not to alter the headline policy category contained in the SMP; the objective is to provide greater clarity on the existing policies (unless a need to revisit SMP policy, as described in **section 4.3**, leads to policy change).

Although there is some duplication amongst the definitions, for example 'local activity only' and 'natural features', this reflects the way in which the headline policies have currently been applied in different SMPs, selecting different ways to present the same intent. While greater consistency would be welcome and should be introduced going forward (see **section 5.4**), this has been considered impractical at this time.

5.3.2 Clarify management intent

The Health Check confirms that there is a need for a clearer definition of the rationale behind the identified management policies, demonstrating the link between those policies and delivering the longer-term management intent. This should succinctly set out the primary drivers and constraints for setting a particular suite of policies at each location.

For most locations this explanation already exists within the SMP documents and within the policy statements, but this should be briefly summarised, ideally in a single sentence. Guidance to help formulate this is set out in **section 5.6**.

5.3.3 Produce SMP Policy Summary

The details arising from these updates will be captured in a table summarising this information across the whole SMP. The format for constructing these summaries is set out in **section 13**.

5.4 Addressing SMP policy changes

This section sets out how to improve policy clarity where a policy change is made as a result of actions following the Health Check, or in future if there is a policy review as described in **section 4.3**. The principles are the same as described in **section 5.3** for addressing the Health Check findings, but there are some subtle differences in how these principles should be applied for future policy changes.

5.4.1 Selection of policy category and sub-category

The tables in **section 5.5** provide details of the categories and sub-categories that can be applied and guidance on how those should be used. However, in those tables some sub-categories occur under multiple headline labels, reflecting current inconsistencies between SMPs (see Box).

To improve consistency, it is recommended that this duplication is eradicated as the SMPs evolve. To achieve this the descriptors in the greyed-out cells at the end of the tables in **section 5.5** should not be used where a policy change is made.

Guidance on some common situations where inconsistencies currently exist and how this can be improved is provided in **section 5.7**.

Box 5.1 Inconsistency of policy labels across SMPs – an example

The first generation SMPs used the policy options ‘do nothing’ and ‘do minimum’ (also referred to as ‘limited intervention’).

Do nothing was replaced by No Active Intervention, whilst do-minimum was then variously applied across different SMPs under all three categories: No Active Intervention, Hold the Line and Managed Realignment.

5.4.2 Summarise management intent

Where a policy change is made, it is expected that a new policy statement should be provided to supersede that in the SMP. This should still be summarised and captured alongside the policy categories.

As described in **section 5.3.2**, this should succinctly set out why that particular suite of policies has been set at that location. It is likely that this will have been defined either by the reasons the change is proposed, or by the assessments carried out to assess that change.

Guidance to formulate these statements is set out in **section 5.6**.

5.4.3 Produce SMP policy summary

The details arising from the change should be included as an update to the SMP Status Tracker (see **section 13**).

5.5 Policy sub-categories

The following tables set out the list of policy sub-categories to be applied, which provide an additional layer of information describing the approach intended to deliver the SMP for each policy units. These additional descriptors are intentionally ‘blunt’, as

their purpose is to provide more clarity of what the policy statements actually state and reduce any ambiguity or mis-interpretation. Included in the tables is guidance to determine where each of these sub-categories are applied.

The sub-categories should be applied with reference to the headline policy - refer to **section 5.5.1** for NAI policies, **section 5.5.2** for HTL policies and **section 5.5.3** for MR policies.

Using the descriptions in the right-hand column, select the sub-category that primarily describes the intended management approach stated in the SMP policy statement.

[Supplementary Note: These definitions have been adjusted since original Guidance development in light of application and feedback from SMP Groups in 2021-23.]

5.5.1 No Active Intervention

Policy Sub-Category	Application
No need to Defend	<i>Where there are no or few buildings, protected sites or other assets at risk and no defences are present. There is no requirement or intention to introduce defences.</i>
Do not Defend	<i>Where no defences are present, and it would be technically, economically, or environmentally unsustainable to introduce defences due to their impact on other communities, or on sites protected for their environmental importance.</i>
Cease to Maintain	<i>Where defences are present, but it would be technically, economically, or environmentally unsustainable to maintain them.</i>
Local Activity Only	<i>Where the overall intention is for a natural shoreline, not to encourage new defences. In some areas, where specified in the Shoreline Management Plan, works to repair or construct short stretches of defence to provide localised protection (such as to a slipway, access point or isolated properties) may be considered by the Local Planning Authority. All works require relevant permissions.</i>
<i>The following category should only be used as part of the initial post-Health Check exercise (section 5.3) – <u>not</u> for any future policy reviews (see section 5.4)</i>	
Remove Defences	<i>Where defences are present, and the intention is to remove them if funding allows to allow flooding to higher ground or to allow erosion.</i> <i>For future policy changes this would be captured under Managed Realignment.</i>

5.5.2 Hold the Line

Policy Sub-Category	Application
Maintain / Replace	<i>Where protection is currently provided by coastal defence structures or managed beaches, and the intention is to retain a defence along approximately the current alignment. This will involve replacing defences when needed. Defence type, method and standard of protection may be modified over time.</i>
New Defences	<i>Where there is little or no protection currently, and the intention is for new defences to be introduced, if funding allows. Introduction of new defences may follow a period of Managed Realignment or No Active Intervention.</i>
Repair not Replace	<i>Where protection is currently provided by coastal defence structures that might be maintained or repaired if funding allows, but not replaced if they fail or reach the end of their design life.</i>
Temporary Intervention	<i>Where non-permanent or short-term measures to reduce flood or erosion risk might be permitted while transition measures or response plans are being established.</i>
<i>The following categories should only be used as part of the initial post-Health Check exercise (section 5.3) – <u>not</u> for any future policy reviews (see section 5.4).</i>	
Local Activity Only	<i>Where the overall intention is for a natural shoreline, not to encourage new defences. In some areas, where specified in the Shoreline Management Plan, works to repair or construct short stretches of defence to provide localised protection (such as to a slipway, access point or isolated properties) may be considered by the Local Planning Authority. All works require relevant permissions.</i> <i>For future policy changes this would be captured under No Active Intervention.</i>
Natural Features	<i>Where the intention is to maintain the flood or erosion risk management performance of a natural feature such as dune system, spit, or shingle barrier. This does not always mean fixing its position. The approach might involve active management of the feature or its surroundings to increase its width, length, height, or resilience. It does not involve building structures on or behind the natural feature.</i> <i>For future policy changes this would be captured under Managed Realignment.</i>

5.5.3 Managed Realignment

Policy Sub-Category	Application
Set Back Defence	<i>Where the intention is to defend elsewhere in the flood plain inland from present shoreline or allow erosion/recession to a defined alignment. New defences might be constructed at that new location if needed. This may involve the creation of inter-tidal habitat.</i>
Slow Erosion	<i>Where measures might be introduced or permitted that slow, not stop, erosion of cliffs or other features at the back of the shoreline.</i>
Remove Defences	<i>Where defences are present, and the intention is to remove them to allow flooding to higher ground or to allow erosion.</i>
Natural Features	<i>Where the intention is to maintain the flood or erosion risk management performance of a natural feature such as dune system, spit, or shingle barrier. This does not always mean fixing its position. The approach might involve active management of the feature or its surroundings to increase its width, length, height, or resilience. It does not involve building structures on or behind the natural feature.</i>
<i>The following categories should only be used as part of the initial post-Health Check exercise (section 5.3) – <u>not</u> for any future policy reviews (see section 5.4).</i>	
Repair not Replace	<i>Where protection is currently provided by coastal defence structures that might be maintained or repaired if funding allows, but not replaced if they fail or reach the end of their design life.</i> <i>For future policy changes this would be captured under Hold the Line.</i>
Local Activity Only	<i>Where the overall intention is for a natural shoreline, not to encourage new defences. In some areas, where specified in the Shoreline Management Plan, works to repair or construct short stretches of defence to provide localised protection (such as to a slipway, access point or isolated properties) may be considered by the Local Planning Authority. All works require relevant permissions.</i> <i>For future policy changes this would be captured under No Active Intervention.</i>
Placeholder	<i>Managed realignment or defence activity may apply only to parts of this shoreline. The approach in this location may be especially dependent upon the outcome of further studies, economic assessments, the rate of coastal change or the actions of other asset owners affected by coastal change. As these become clearer, the management intention will be clarified.</i>

For future policy changes these would be reassigned as appropriate to the outcome of the further assessments.

5.6 Management intent

There are many instances where the policy will have little effect beyond the boundaries of that policy unit, but in others any deviation from that policy could have much wider implications. That reason for the policy being set is not always apparent to those seeing the headline policy alone and can be interpreted by different people with different interests in variable ways.

Recognising that the policy statements can be lengthy, technical, and not always of interest to many, a clear and readily accessible narrative is needed to simply communicate the fundamental rationale for the policies in the SMP (or resulting from a review of policy).

This should succinctly set out the primary reasons underpinning the sequence of policies at a location. For most policy units this explanation already exists within the SMP documents and within the policy statements themselves, so can be distilled from that. But it should be briefly summarised, ideally in a single sentence.

5.6.1 Guiding principles

The range and diversity of reasons for setting a particular policy make it inappropriate for this guidance to set out series of standard statements for describing the rationale. But to ensure consistency in the structure of these summaries, the following key components should be considered when producing these:

- State principal reasons for the policy selection, especially where this might not be immediately apparent.
- If relevant, provide an indication of whether adherence to that policy is strategic and essential to deliver the target intent of the SMP.

Conveying the strategic context of any policies is essential to provide an appreciation of their significance to planners, elected officials the public and other stakeholders and interested parties. This is particularly important if there are development ambitions or pressures to defend areas where this is contrary to the wider management intent.

Examples might include the critical need to allow erosion to supply beaches further along the coast, the need to provide compensatory habitat to enable defence to other locations, or the requirement to protect critical infrastructure which has regional not just local significance.

It is not necessary to set out all of the components; but they should inform key messages that need to be conveyed. The temptation to describe all the reasons for setting a policy could result in lengthy narratives, so should be avoided. The objective here is to identify any fundamental considerations at that location, not produce a 'catch-all' list.

5.6.2 Examples

Some examples of the management rationale applying these principles are set out below:

- *Defend local community from flooding, but through measures which do not halt alongshore sediment drift.*
- *Town and associated infrastructure critical to tourism and regional economy, requiring protection that includes provision of beach.*
- *Allow the shoreline to attain a more natural position before defending properties along a new more sustainable alignment.*
- *No case for national funding but works by landowners to maintain existing structures may be acceptable.*
- *No assets to protect, no requirement for interventions.*
- *Cliff erosion critical to supply sediment to beaches and provide natural defence to downcoast communities.*
- *Management only of the shingle ridge to support flood risk management - structural interventions are detrimental and not acceptable.*
- *Internationally designated natural habitats would be damaged by continued defence of shoreline.*
- *Creation of intertidal compensatory habitat required to enable defences to be constructed to protect communities in the SMP area.*

Capturing this rationale alongside the policy categories and sub-categories within the SMP Status Tracker is set out in **section 13**.

5.7 Removing inconsistent use of policy sub-categories

As described in **section 5.4** it is recommended that the use of policy categories is rationalised where different sub-categories have been used to describe the similar intentions, for example for managing natural features.

This section guides on how to remove those inconsistencies if and when policy reviews are carried out, so this is not perpetuated. The following describes some of the more common occurrences.

Raising Defences / Changing the Standard of Protection

In some SMPs it was felt necessary to introduce some different policy labels designed to address the standard of protection provided.

The 2006 SMP guidance (volume 1, section 13), is however clear that the definition of Hold the Line is by “*maintaining or changing the standard of protection*”. Consequently, it should be unnecessary for any policy descriptors to be amended to reflect any possible need to raise defences or alter the standard of protection. Using the updated descriptors, these would fall under

- **Hold the Line (Maintain / Replace).**

It is the role of strategy plans or schemes to explicitly define what that standard should be, based upon the economics of flood or erosion risk management.

Should standard of protection be seen as a key driver or critical to the policy selection, the above approach would not however preclude the inclusion of any such clarification in the statement of management intent.

Non-FCERM / non-RMA Assets

Some SMPs have adopted different policies where the shoreline assets are not owned or maintained by the RMA, on the basis that someone else will be responsible for actions and funding. Examples include where private landowners are responsible for flood embankments protecting their land or railways run along the coast, defined as NAI.

The basis for policy definition should be exactly the same for these assets as for areas where RMAs have a responsibility, not different simply because those situations may need to be funded outside of FCERM GiA.

For example, where the agreed intent is to provide some form of defence along the length of the policy unit, to protect the assets (such as properties and infrastructure), then a Hold the Line category should generally apply irrespective of ownership or funding source, with the appropriate sub-category added, e.g.

- **Hold the Line (Maintain / Replace).**

The basis for this and any considerations for its implementation may need to be reflected in the statement of management intent.

Natural Features

All three different policy categories are currently used to represent very similar situations.

Where these exist and there is no intent or expectation of any defence management intervention, then these should be categorised as

- **No Active Intervention (No need to Defend).**

Where there may be some requirement to manage these features in the future, e.g. to prevent or repair breaches of dunes or barrier beaches which could otherwise lead to flooding, then the intent will be to maintain the integrity of the feature rather than fix its position (which would be potentially unsustainable). Therefore, it is recommended that this situation should be captured as

- **Managed Realignment (Natural Features),** not Hold the Line.

Minor Isolated Structures

There are many policy units with long lengths of undefended natural shorelines, where isolated structures exist, or short lengths of defences are in place (or might be permitted) which have little impact upon the overall natural functioning of that stretch of coast.

Given the underlying intent of management for these lengths of shoreline is to allow the coast to function as naturally as possible, and where these interventions have no significant detrimental impact upon that, these situations should all be captured as

- **No Active Intervention (Local Activity Only),** not Hold the Line or Managed Realignment.

Repair not Replace

There are two justifiable categorisations for a policy to repair, but not replace: depending on the situation, this could be Hold the Line and No Active Intervention. The application of any Managed Realignment policy descriptor should be avoided for this case.

Where this applies to defences throughout the entire policy unit, this situation ought to be captured as

- **Hold the Line (Repair not Replace).**

Where this applies to isolated defences only on an otherwise undefended natural shoreline and the intent is for that shoreline to function as naturally as possible, including those currently defended sections, then these would be captured as

- **No Active Intervention (Local Activity Only).**

Outflanking

Where defences need to extend into another policy unit to prevent them from being outflanked by further erosion, for example where there is a No Active Intervention unit next to a Hold the Line unit, then the policy unit boundary should be reassessed and adjusted if necessary. This should be subject to the same policy change process that is applied in all other situations where a policy change is reviewed, as described in **section 4.2.3 (Amendments)**.

Defence Removal

Where defences are to be actively removed, with the intent (or prior action) to then provide defences on a new landward alignment, this would be categorised as

- **Managed Realignment (Set Back Defence).**

That would then be followed by a policy to Hold the Line (Maintain / Repair).

Where defences are to be actively removed, to allow a return to natural coastal functioning, this should be captured by

- **Managed Realignment (Remove Defences),**

That would then typically be followed by a policy of No Active Intervention and the most appropriate sub-category depending upon subsequent intentions.

Application of Advance the Line

The definitions set out in the 2006 Guidance (volume 1, section 2.3) clearly state that use of the **Advance the Line** policy “*should be limited to those policy units where significant land reclamation is considered.*” This descriptor should not be used for areas where there are already defences but works might encroach seaward to enable the same assets to be protected.

This is also covered by the 2006 Guidance, stating that a **Hold the Line** policy covers “*those situations where work or operations are carried out in front of the existing defences to improve or maintain the standard of protection provided by the existing defence line*”.

Therefore, where works are undertaken for example to develop a beach in front of an existing seawall, including any control structures required; or where a seawall requires additional rock protection at the toe, or rebuilding with a new line of sheet piling in front of the existing toe; to sustain that existing defence line, this is

- **Hold the Line (Maintain / Replace),** not Advance the Line.

Given the very limited circumstances where Advance the Line might be used, i.e. to extend land development seaward, no policy sub-categories are required.

Other applications

a) Relocation activities

Since developing the SMPs, RMAs now often work with communities in new ways to address the impacts of coastal erosion or flooding. Property re-location is also now being considered as a risk management measure that can potentially draw grant aid funding. Such adaptation responses are often a key element of the delivery of both Managed Realignment and No Active Intervention policies. But although the intent may be the same, the perception of what No Active Intervention and Managed Realignment means to communities and businesses is very different – the first suggests abandonment, the second suggests action.

This can lead to difficulties with the application of policy descriptors. A shoreline management policy of No Active Intervention belies the often significant intervention required by RMAs locally to manage the consequences of that policy, whilst Managed Realignment might be interpreted to incorporate adaptation actions such as relocation. However, SMPs focus primarily upon the shoreline management response to coastal processes for FCERM purposes, not on the land use planning response in the hinterland. They should be set out with reference to that shoreline response and the sub-categories detailed in **section 5.5**. As such, the need for adaptation measures such as property relocation does not in itself denote a SMP policy of Managed Realignment. Engagement with those affected by these policies should make these distinctions clear.

b) Placeholder

Managed Realignment has already been applied as a 'catch-all' in some cases to cover a multitude of other situations, including that above. A further example is where there is a dependency on other asset or landowners taking non-defence related actions (such as to relocate a highway, golf course); another where there was a need for 'adaptation' measures to first be developed.

Although a 'Placeholder' sub-category has been identified to capture those that already exist, this should be avoided in any future policy review, which should have the aim of establishing a clear plan to progress forward.

6 Management triggers

The section provides guidance on how to translate the concepts introduced in **section 3** through the identification and application of triggers within SMPs, particularly for those locations where a policy transition is planned.

6.1 Definitions and distinctions

Triggers

Clear definition of terminology used when considering a trigger-based approach is important. As set out in **section 3**, in the context of SMPs, the following can be used:

- **Trigger type: a parameter or combination of parameters** which can reach a point where existing policies and responses (e.g. management approaches) would need to transition or change.
- **Trigger point: the limit (value/ occurrence)** relating to the trigger that, once reached, would result in policy transition or change.

Change

In the context of SMPs, triggers may apply to two situations:

1. Defining the appropriate point for **policy transition**, i.e. as defined by the SMP to deliver on the long-term management intent.
2. A shift in circumstances that creates a need to consider a **change in policy** from that defined by the SMP.

This guidance focusses upon the first, aligning with the principles set out in **section 3**. Although existing SMP epochs should be retained as a broad framework, in many areas there is a degree of uncertainty as to what drives the need for some form of transition, and when trigger values for that policy transition will be met.

Triggers may also drive policy change, being enablers or constraints on how the shoreline is managed (point 2). These are less predictable and not readily planned for, generally determining a need to review the SMP policy. The policy review process is described in **section 4.3**.

6.2 Application

Policy transitions

Triggers can be used to inform timing of policy transitions, providing greater transparency than reference to an unspecific 'epoch 2', and greater clarity over the reason for that transition taking place. A better appreciation of timing allows the necessary planning and actions to be put in place at the right times to support that.

To apply triggers to inform this process, the following steps are required:

- a) Determine which key trigger type(s) is relevant to the transition in policy (**section 6.3.2**).
- b) Establish for each trigger type the level/ threshold that will require the transition (**section 6.3.3**).

- c) Estimate / predict the timing when that trigger level is expected to be reached (**section 6.3.3**).
- d) Identify the activities needed to prepare for transition.
- e) Estimate the lead in time to deliver those activities.

Steps (a) and (b) will enable identification of the key parameters to be monitored and any other necessary assessments to be defined, to measure and maintain a watching brief against the initial estimate made in step (c), adjusting planning accordingly.

Having undertaken steps (d) and (e), these need to be acted upon at the appropriate time.

Actions may include commencing engagement activities, sourcing funding, or establishing response plans for those affected by the transition in policy and management approach. These should be captured in the Action Plan (see **section 14**).

Identifying trigger types

Trigger types may be considered under two broad categories:

- Physical Processes.
- Enablers and Inhibitors.

Examples of these are listed in Boxes 6.1 and 6.2.

Several of the **Enablers** and **Inhibitors** identified would only be likely to instigate a policy review, representing a different circumstance to that upon which the SMP is based, rather than apply to a transitional change identified by the SMP.

The trigger for transitional change will often relate to the projected change in the **Physical Processes** at the coast but may also sometimes be driven by **Enablers** such as an injection of funding, or **Inhibitors** such capacity for change, for example the time needed for relocation of communities or infrastructure.

Box 6.1 Physical Processes

Physical Processes that can be measured and used to determine when an action or change is required include:

- **Erosion/ recession extent**, where there is an associated risk to property or other assets.
- **Flood risk probability/ frequency**, where there is an associated risk to property or other assets.
- **Defence/ structure deterioration**, leading to either increased risk of failure or need for further work on asset to retain its FCERM function.
- **Habitat change/ loss**, affecting the extent and/or quality.
- **Climate change**, accelerating or decelerating any of the above.
- **Extreme events**, resulting in a sudden step change in any of the above.

Box 6.2 Enablers and Inhibitors

Other triggers which can drive, enable or restrict the requirement for action or change, include:

- **New information, studies, knowledge** becomes available that challenges the appropriateness of the SMP policy.
- **Insufficient funding/lack of affordability**, meaning planned interventions are not deliverable.
- **Injection of funding**, enabling planned interventions sooner, or driving for interventions in new locations.
- **Relocation of infrastructure/property/people**, meaning intervention requirements change.
- **Changes in land-use/development**, including new development or decommissioning of sites, which may increase/decrease/enable/hamper intervention requirements.
- **Changes to commercial/industrial operations** with associated coastal defence function, e.g. railway embankments, port structures.
- **Social attitudes change**, altering the acceptance or otherwise of environmentally sustainable or unsustainable practices, provision of FCERM etc.
- **New designations/habitat adapted**, requiring a change in policies to prevent negative impacts or support (extent or timing).
- **Changes to Legislation / National Policy**, alters objectives and requirements for coastal risk management at the coast.

Setting trigger points

It is common in other management situations, such as beach management plans, to have a range of trigger levels each eliciting different levels of response, for example “alarm” and “crisis” or “action” and “emergency”, each attempting to define a period of awareness and planning, before a definitive action is required.

However, a single threshold level is recommended for each trigger within SMPs, that being the defined ‘change’ point at which the policy transition, or a policy change will need to take place, rather than the ‘planning for change’ point.

It is impossible to provide prescriptive rules for setting values to inform the trigger point; this will depend on the type of trigger and also understanding of site-specific conditions (see Box for example trigger points). But in broad terms, those relating to **Physical Processes**, are more likely to be quantifiable. For example, rates of erosion, sea level rise, deterioration, changes in risk, can all be measured through monitoring, and predicted trends and changes can be calculated. But those relating to **Enablers and Inhibitors** are generally not quantifiable and are often binary in their nature. For example, many of the triggers described in this category either occur or they do not.

The type of trigger also influences the timescale of change. This can mean the difference between proactive and reactive management responses.

Physical Processes triggers are driven by a predicted timescale of change, which can be informed by studies and monitoring. As such it is generally possible to have a proactive management response to these, identifying a lead in time and trigger level at

which anticipatory planning and enabling activities might be undertaken. The lead in time for these activities will have to be considered on a case-by-case basis and it is recommended that an approximate time window rather than a specific date should be defined, accepting these are variable natural processes. It is therefore important to also consider sensitivities and risks. As such, the timescale needs to be monitored, reviewed and updated regularly, so the lead in time and associated requirements can be adjusted accordingly. The potential for more sudden or significant change should also be recognised, for example a major storm destroying a defence that could trigger the need to implement the transition much sooner than anticipated.

Trigger points relating to **Enablers and Inhibitors** are less predictable and certain. Where these are a key consideration for transitioning policy, those governing the SMP will need to define a realistic planning horizon – the anticipated point in time when change will be required. That will set the timescale over which other policies, and strategic or tactical actions need to be agreed.

Box 6.1 Example trigger points

The Coastal Change Adaptation Planning Guidance (CCAPG), 2015, includes some examples of the use of triggers to drive management actions in regard to planning decisions.

For example, in the case of areas where the SMP policy is to transition from Hold the Line to Managed Realignment, the timing of implementing that transition may be driven by:

- More detailed work being done to define a set-back area in which MR will occur, with triggers needed to enable MR to occur.
- When existing habitat extent is observed to be reducing (based on ongoing monitoring) and action is needed to create space for habitat to evolve into.
- When an FCERM asset is assessed as falling below the required standard (condition / performance), then that may trigger implementation of MR.

In the case of areas where the SMP policy is to transition from Hold the Line / Managed Realignment to No Active Intervention, timing to implement that transition may be driven by:

- It becomes unviable to continue to justify ongoing maintenance/repair/capital replacement of existing defences, so operator needs to decommission.
- It becomes undesirable to continue to retain a defence along the shoreline due to adverse impacts doing so will have on down-drift coasts.

In areas of coastal erosion (such as where SMP policy is, or is planned to, transition to No Active Intervention), another example is adopting either or both of the following as trigger levels for driving changes in land-use in impacted areas:

- Cliff top position relative to assets at risk is within X m of the seaward edge of the asset(s).
- When existing defences become outflanked by erosion of adjacent shoreline to an extent that it poses an increased risk of defences failing and/or reduced performance.

7 Climate change

This section sets out how climate change is and should be accounted for within SMPs. It considers the key implications of the latest climate change projections and how these should be considered when addressing issues identified in the Health Checks or reviewing SMP policy as part of a change process.

7.1 Background

Climate change is particularly challenging for long-term shoreline management decision-making as the future rates and nature of change are highly uncertain, due to scientific uncertainty in some of the processes driving the climate change variables, and in the future rates of greenhouse gas emissions. However, we are confident that sea level rise (SLR), which in most coastal areas is the most directly relevant climate change variable, will continue with increasing rates of rise, and will continue to occur beyond the end of this century.

With respect to other climate change variables, there is less certainty in exactly what climate change will mean, although greater variability in climate is widely predicted. There is significant uncertainty in future projections of wave climate and storm surges, both intensity and frequency. Rainfall is the other important consideration for coastal risk management, both as a driver of fluvial and pluvial flooding and in causing instability in coastal slopes.

In practice, the direct hydraulic and hydrologic impacts of climate rarely drive SMP policy setting, but their indirect impacts are very relevant: in particular via coastal processes, development of intertidal habitats and impact on defence performance. These can however be difficult to predict, which further increases the uncertainty.

7.2 Climate change projections

The latest climate projections for the UK (UKCP18) include an extensive data portal and various supporting/explanatory reports:

- The 'Marine report' (Palmer et al., 2018) provides a detailed review of past and potential future SLR and storms.
<https://www.metoffice.gov.uk/pub/data/weather/uk/ukcp18/science-reports/UKCP18-Marine-report.pdf>
- The 'UKCP18 Factsheet: Sea Level Rise and Storm Surge' (Met Office, 2018) summarises key items that are relevant to shoreline management planning.
<https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-fact-sheet-sea-level-rise-and-storm-surge.pdf>

UKCP18 uses newer climate models, additional observations and more recent views of how emissions may change in the future. These improvements increase confidence in the ranges of future climate over the UK. In UKCP18 the end of SLR projections is higher than in UKCP09 due principally to the new treatment of land ice contribution to SLR. However, current allowances used for the majority of SMPs are in line with 2006 guidance, and supplementary advice provided by the Environment Agency in March 2019 states that the *current allowances already represent the high end of the range of SLR projected by UKCP18*, meaning the basis of the SMP appraisals remain valid.

It is anticipated that in due course updated guidance will be issued by the Environment Agency explicitly reflecting the UKCP18 projections, or other climate research that might be published.

In addition to the central projections of forthcoming updated EA guidance and UKCP18, there are two other products of note for long-term shoreline management:

- UKCP18 includes exploratory estimates of SLR out to 2300, which show continued rise beyond 2100, in any emissions scenario. This confirms SLR is a long-term challenge that will continue to impact our shorelines beyond current SMP timescales and means that the uncertainty is now primarily related to when higher sea levels will be reached rather than if, providing coastal managers with confidence in planning for future higher sea levels and their impacts.
- Additionally, the existing EA guidance includes a High++ scenario, with SLR approaching 2 m by 2100 which would undoubtedly have significant implications for much of the England and Wales coastline and potentially change the viability of current shoreline management policy nationally. However, the existing guidance suggests that H++ would not typically be considered in SMP policy setting.

Both of these products suggest that sea levels will rise above the current core projections range in the long-term, and it is possible that large increases could occur this century.

Consequently, the long-term intent of management (typically captured through the policy for epoch 3) may need to be flexible to these higher levels. Similarly, the timing of policy transitions and the lead time for actions must be flexible, with climate change a key consideration for the definition of triggers (see **section 6 Management triggers**). In some instances it may be appropriate to undertake a sensitivity test where a more rapid rate of SLR could affect policy viability.

7.3 Current incorporation of climate change in SMPs

The 2006 SMP guidance (volume 1, section 2.2) identifies that “SMPs can begin to let policy-makers and the public know about the need for longer-term solutions to natural coastal change, climate change and a rise in sea levels.” It also identifies that “Shoreline management policies should take account of ... climate change guidelines associated with flood and coastal defence” and has references to specific consideration of climate change throughout the guidance.

Climate change alters the driving conditions at the shoreline, affecting coastal processes, and these influence hazards, the performance of coastal defences and the future development of intertidal habitats.

Although all SMPs presently account for climate change in defining long-term management planning, the focus has generally been on the direction and order of magnitude of such change, rather than precise values. This reflected the uncertainties and variations between different scenarios, and strategic level of the SMPs, without compromising the general conclusions and are currently reflected in SMP outputs as follows.

Coastal Behaviour and Evolution

This was typically a qualitative assessment of a combination of processes driving coastal change and their evolution over the three epochs, recognising the uncertainties in both climate change impacts on natural features and the present quality of the

predictive tools for quantifying changes in geomorphological forms. As a qualitative appraisal, climate change was clearly included, however explicit use of or reference to specific projections was typically not included, unless such had been provided by previous studies (for example, strategy or scheme appraisals). Consequently, and given the range of factors included in these particular assessments, these outputs are therefore not considered sensitive to small differences in predicted climate projections.

Flood and Erosion Hazard mapping

This was informed by the evolution analysis and underpinned the objectives assessment. The consideration of climate change differed for flooding, erosion and intertidal habitats:

- Future flooding hazards were mapped for all SMPs and were typically produced through the addition of a SLR allowance to present day water levels. This applied specific values for future SLR for each epoch, which are typically consistent with the 2006 (FCDPAG3) climate change guidance in place at the time of the SMP. As such, adopting different SLR values could impact the flood extents, dependent upon the topography of the flood area, but is unlikely to significantly affect the overall SMP management intent which is generally not based on a specific Standard of Protection (see coastal defence assessments below).
- Future erosion hazards were also mapped, but the available methodologies for considering the effects of SLR on future rates of erosion have significant uncertainties. As such, wide bands of potential future erosion rather than single lines were typically produced in SMPs reflecting this uncertainty, and these were not presented as being reflective of a single climate or SLR projection. Similarly, consideration of the impact of future changes in rainfall on slope instability is highly uncertain, so estimates of slope failure frequency and extent were not developed in relation to an individual climate change projection. Consequently, mapping of these hazards is not sensitive to small differences in SLR (or rainfall) projection.

Nature conservation assessments

Where loss of intertidal habitat was also calculated to inform the need/ambitions for habitat creation, SLR is a consideration in determining this process, particularly 'coastal squeeze', based on tidal elevations.

That approach has varied between SMPs, but uncertainties in the data and methods mean these calculations have high inherent inaccuracy. Nonetheless, potential habitat loss calculations have driven compensatory requirement calculations, based on specific SLR projections.

As such, adopting different SLR values could impact the habitat loss estimates, and consequently compensation requirements and also choice of policy.

Coastal defence assessments

These principally focused on the condition and residual life of existing structures and their interaction with the foreshore. The direct impact of climate change on defences will be to reduce their Standard of Protection (SoP) and potentially increase exposure which can accelerate the rate of deterioration and reduce residual life. The residual life appraisal typically uses reported asset data and is considered in policy implementation and transition timings.

Neither the SoP nor residual life typically drive the SMP policies or long-term management intent, but are important in consideration of the timing of policy transitions. However, the consideration of climate change impacting defences is fairly

high level within the SMPs, so these assessments are unlikely to be sensitive to small changes in SLR projections and will not impact policy recommendations.

Of the above SMP outputs, it is only flood mapping and intertidal habitat loss that typically used a specific future climate change (SLR) projection and are considered sensitive to the adoption of different SLR values. As such, it is unlikely that the adoption of the updated SLR (or rainfall) values arising from the UKCP18 projections would result in significant changes to the underlying analysis and consequently the SMP as currently presented would be expected to remain valid in terms of the latest climate change projections.

Some SMPs also reference rates of SLR in terms of policy implementation and the potential timing of interventions. This is often related to existing coastal defence residual life as described above. It is therefore possible that changes to the SLR projections could affect timing of policy transitions.

7.4 Addressing findings from the Health Checks

The Health Check process has broadly confirmed that the existing SMPs take account of climate change in line with the predictions in existing guidance, and that the differences in the updated projections in UKCP18 do not at present suggest a fundamental shift in SMP policies and therefore not warrant a wholesale revisit of SMPs.

However, although the SMPs already take into account the impacts of climate change in the policies that are set, the potential remains for changes occurring faster than previously predicted, or the predicted magnitude of change to increase. As more information becomes available this should be kept under regular review.

Other Health Check findings will lead to a review of policies. It is essential that future climate change is appropriately considered as part of that process, as well as in the definition of management triggers, in line with the further guidance provided below.

7.5 Assessing SMP policy changes

The policy review process should consider not only the present epoch, but also the long-term aspiration and policies for an area, to ensure a sustainable approach is defined. Integration of future climate change and the associated uncertainties is an essential element of this, and when any SMP policy is being reviewed, the latest available climate change guidance should be used.

As described in 7.3, there are a number of ways in which climate change will influence future shoreline management decisions in terms of both the policy and approach:

Policy:

Increased areas, and hence receptors, at risk of flooding, erosion or landsliding, influencing viability of protection policies.

Narrowing intertidal areas due to coastal squeeze, reducing viability of Hold the Line policy options due to habitat loss and increasing the need for habitat compensation / mitigation which could in itself drive policy setting.

Larger structures required to provide/maintain protection to at risk areas, increasing environmental impacts and costs, potentially reducing viability of protection policies.

Policy Implementation Increased overtopping of coastal structures requiring earlier intervention to manage, or potentially triggering a transition in policy where appropriate.

Increased damage/deterioration of coastal protection assets, requiring increased maintenance or triggering policy transition.

Section 4.3 sets out the SMP policy review process. The following actions should be undertaken to specifically consider climate change as part of this process:

- Confirm current government guidance for climate change in FCERM, considering the range of projections.
- Where considered significant, review/ update baseline coastal process and coastal defence appraisals, taking account of the recommendations of current climate change guidance. Consider potential sensitivity of appraisals to possible changes in waves, storm surge and rainfall, noting key sensitivities.
- Undertake policy appraisal, including consideration of the above outputs. Select preferred policies that are responsive to projected climate change as presented in government guidance.
- Consider the impact of sea levels higher than those presented in the core FCERM guidance (either beyond 2100 or under a H++ scenario) on the long-term shoreline management intent for the policy unit. Ensure that the proposed policy sequence remains viable under accelerated/longer-term sea level rise. This can be considered as a 'sensitivity test' on the policy recommendations, adjusting policy definition as appropriate.
- Provide a clear statement on how climate change has been considered in the policy review process for future transparency. Include in SMP reporting.

8 Funding

This section provides guidance on how funding and affordability should be taken into account in responding to the Health Checks findings and in ongoing shoreline management planning.

8.1 General principles

The 2006 SMP guidance stated that economic factors need to be taken into account in setting policy, but that it would not be appropriate for quantified economic viability to drive the selection of the preferred policy. This is because the calculation methods, based on Treasury guidance, are meant for ‘time-now’ justification of government investment, but do not capture the range of factors that determine what is the most sustainable longer-term shoreline management approach. In particular, funding rules change over time, so they are not suitable for driving SMP policy for the medium and long-term, with the focus being more on the broader benefits of the outcomes rather than where the money comes from. Box 8.1 provides an overview of FCERM funding.

Nonetheless, affordability and funding are critical factors for implementing policies, particularly where interventions or actions are going to be required soon. So, some level of economic consideration is required if the SMP policies are to be delivered. However, that assessment is only likely to be realistic for an initial 10 to 20 year time horizon; a timescale also more consistent with development planning and reflecting that any financial commitments beyond this timescale are likely to be impossible to guarantee. Guidance on addressing these is set out in the sections below and intended for two situations: (1) for those policy units with funding challenges as flagged up by the Health Checks and (2) in the context of policy review or where funding appears to threaten policy delivery within that immediate planning timeframe.

Box 8.1 Approach to FCERM and funding – an overview

Flood and coastal risk management grant in aid (FCERM GiA) is sourced from central government and is administered through the Environment Agency. Flood Risk Management Authorities (RMAs) - the Environment Agency, English local authorities and Internal Drainage Boards (IDBs) can use it for a range of activities that help reduce the risk of flooding and coastal erosion, but allocation is managed through the Regional Flood and Coastal Committees (RFCCs) based on a competitive Partnership Funding score.

An important point to note is that policies in the SMP, for example to Hold the Line, do not in any way indicate an entitlement to funding. In addition, not all activities needed to implement SMP Policy are eligible for FCERM GiA.

There are also other funding options available when flood and coastal projects can deliver a range of benefits. These can include reducing risk and creating new opportunities for individual private businesses and providing wider benefits to the local / regional economy, such as regeneration, business growth and employment opportunities.

Increasingly in recent years, coastal schemes have secured funding from multiple sources and have delivered a range of benefits to businesses and the wider community. A Partnership Funding calculator is currently used to determine the level of government grant aid and any shortfall in funding that will need to be found from other sources including the wider community and businesses.

8.2 Addressing findings from the Health Checks

The Health Checks have highlighted specific funding challenges in the foreseeable future for many policy units, both in terms of FCERM GiA and contributions from others. Often there is a lack of awareness on the part of local communities and stakeholders of the need for non-FCERM funding. But within the Health Checks this is typically not seen as a reason for reconsidering the policy and most recommendations concern engagement with potential beneficiaries to explore funding sources in line with the Partnership Funding approach, and development of a funding plan for the envisaged intent of management.

Guidance, based upon current FCERM GIA arrangements, is provided in **section 8.4** on how best to approach situations where availability of funds may constrain delivering the preferred policy now or in the future.

There are also cases where the Health Check recommended 'Revisit SMP Policy'. **Section 8.5** provides guidance on how funding considerations should be incorporated into this.

Guidance and advice on identifying and securing funding are continually evolving outside of SMP development, as RMAs seek to address funding challenges on schemes across the country, sharing experience through the Coastal Group network. However, general good practice guidance is presented in **section 8.5.2**.

8.3 Assessing SMP policy changes

Where SMP policy is being reviewed and potentially changed, any funding-related delivery risk should be assessed as part of the validation of the preferred policy.

The 2006 SMP Guidance (Appendix C) prescribed a basic economic validation of the preferred policy based on an indicative Benefit Cost Ratio. This has provided useful indications for policy units with funding challenges, but the analysis provided by the Refresh has refined these insights, including focus on the more immediate term.

This new supplementary guidance retracts the prescribed method of carrying out economic validation of the preferred policy from Appendix C of the 2006 SMP guidance. Instead, a broader assessment of affordability and the risk of a funding shortage preventing the delivery of SMP policy is recommended. This should focus on a period of up to 20 years in terms of any actions that are going to be required during that time to help finance policy delivery. It involves the following steps:

1. Broadly estimate **costs** for the options being considered;
2. Identify the beneficiaries and thus **potential funding sources**;
3. Engage on the above to assess **funding-related delivery risk**;
4. Consider that assessment in selecting the policy option.

This is illustrated in Figure 8.1, with further detail provided in **section 8.5**.

8.4 Addressing affordability issues

While the long-term management objectives should not be dictated by traditional economics, present-day affordability may remain a critical factor.

With a focus on the next 10 to 20 years, if it becomes apparent that the intended actions required cannot be funded, then the following should be considered:

- Can the long-term outcomes still be achieved even if more immediate actions are not delivered?
- Are other lower cost implementation options available now, such as ‘sweating the asset’, although recognising that these may provide a lower standard of protection?
- Might a different implementation approach attract different beneficiaries and funding, offering an alternative pathway to achieving many (if not all) of the same outcomes? Also see Box 8.2.

In each of the above considerations, it is probable that an updated approach to managing the implications and changing risks will need to be developed and affected parties engaged.

Ultimately, there may have to be acceptance that a change in policy is required, and the SMP policy review process needs to be followed (see **section 4.3**).

Box 8.2 Third party funding and management intent

Just because funding can be found from non-FCERM partners to maintain or construct defences, this does not mean that doing so will always be acceptable. Examples include businesses or communities seeking to defend assets where FCERM GiA is not available.

If this is contrary to the intent of management and could compromise the long-term target, for example by disrupting the critical movement of shoreline sediments, or preventing the development of new compensatory habitat, this should be challenged.

Section 5 provides guidance for improving clarity around the SMP management intent that will help highlight the potential for identifying such issues.

Although not a requirement, the SMP Management Group may conclude that carrying out an assessment along these lines could be a prudent action for all policy units identified as likely to require some investment over the forthcoming 10 to 20 years. This could provide a sound basis for wider discussions at a regional level on future planning and sourcing of funds to deliver the next phase of the SMP.

8.5 Guidance for high-level affordability assessment

To assess funding-related delivery risk at the SMP level, a full and detailed assessment of economics is impractical. A higher-level funding risk assessment is therefore advocated where required. This consists of four steps as illustrated in Figure 8.1.

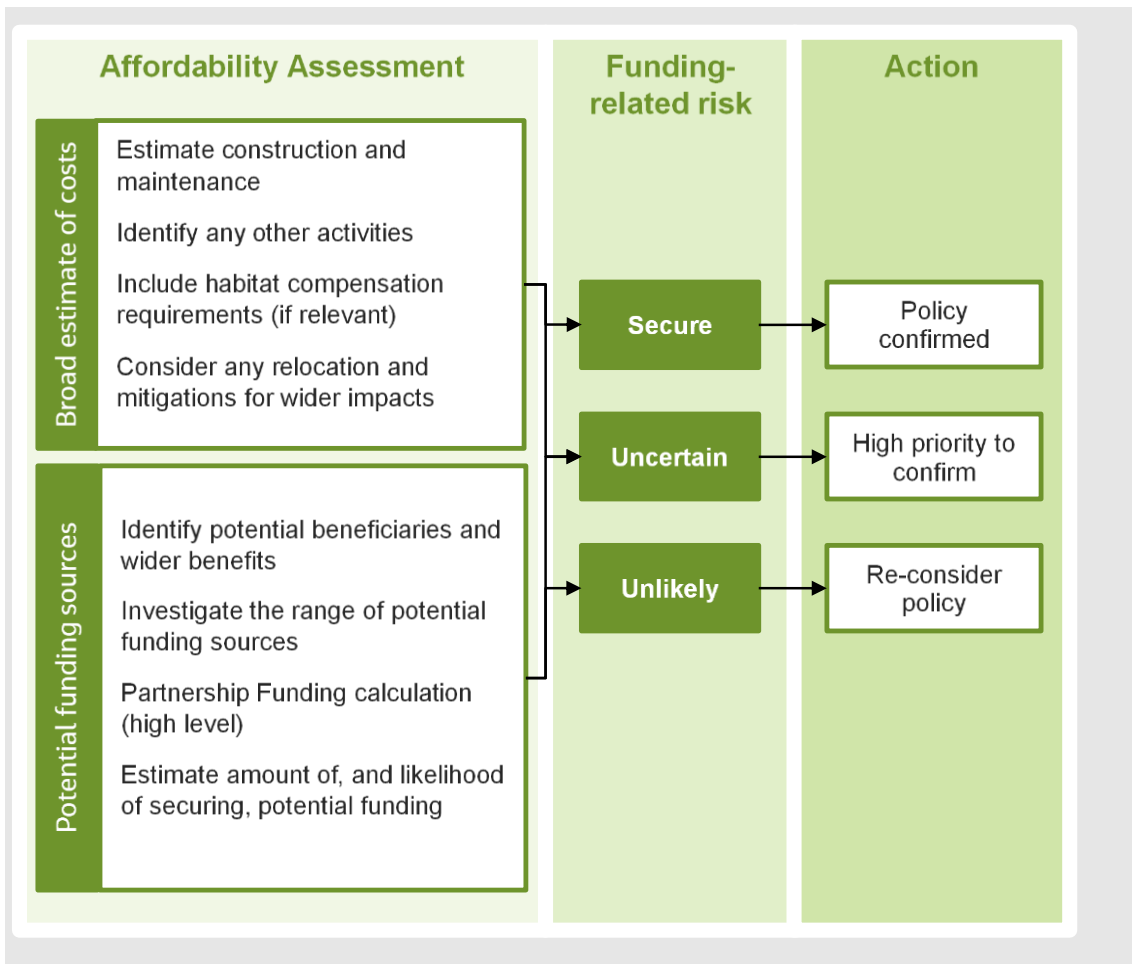


Figure 8.1 Funding Risk Assessment (overview)

8.5.1 Broad estimate of total costs

This should consider the costs to construct and maintain flood and erosion defences, but also the costs of any other activities or impacts related to policy implementation. It needs to consider legal habitat compensation requirements, and where appropriate, it should also consider the costs related to any relocation of property and infrastructure resulting from the policy.

This does not require a detailed and precise estimate but can be indicative and based on directly available information.

8.5.2 Identify beneficiaries and potential funding sources

Although developed as an FCERM plan, the SMPs are looking at integrated outcomes and this should be reflected in funding too. Delivery of SMP policies therefore has to look at both FCERM outcomes and wider beneficiary outcomes, as the wider benefits that will be delivered can also attract other sources of funding. This should not only consider national benefits, but also benefits to the local region or community.

For example, there are examples where a group of businesses requires a beach to attract visitors, and they have invested in a scheme that also delivers this. This approach also allows for additional enhancements and features to the scheme that are desired by other investors, where they are technically and environmentally acceptable. Also see Box 8.3.

Additional potential benefits of habitat creation, carbon offsetting, etc should also be considered, and identifying other outcomes that help justify FCERM GiA.

Even if FCERM GiA funding can currently meet the cost of implementing the policy, it is not certain to be available at the time of implementation. Furthermore, partnership funding should not be seen as simply 'topping up' FCERM GiA: it can in fact lead to a different form of implementation within a policy option. All benefits of a policy should therefore be considered for identification of potential contributors.

The benefits of the SMP policy can be identified from the SMP policy statements, underlying policy appraisal and baseline information. It is important to do this assessment together with other members of the SMP Management Group where benefits may exist over a wider area than a single policy unit.

Box 8.3 Identifying potential beneficiaries

A practical first step that has proven to be successful is to conduct an initial map of beneficiaries and benefits that would be delivered by potential scheme options. Additional assessments can then seek to quantify:

- The contribution to the local economy of the area benefitting from a coastal scheme.
- What local plans and other (i.e. non-FCERM) strategies are supported and even enabled by the SMP policy.
- What commercial development and employment will be both supported and enabled, plus what new business opportunities can be created.

By working in partnership with the range of organisations with an interest in the area, and by using the findings of the studies above to inform discussions, a range of viable ways forward from a funding perspective can be identified.

8.5.3 Assessment of funding-related delivery risk

A broad comparison of costs and funding sources will determine the scale of the challenge. At the broad level of SMP policy setting, three outcomes are possible:

- **Secure:** (nearly) fully covered by funding sources, firm commitment from RMAs and/ or signed agreement from other partners.
- **Uncertain:** the assessment shows a funding gap, but there is a reasonable chance that costs could reduce or that more funding could be identified
- **Unlikely:** there is a low likelihood that funding will be available for implementing the preferred policy.

This guidance does not define fixed and generally applicable threshold values for these three outcomes, because it will strongly depend on local context. The assessment has to be based on local knowledge and judgement.

The next steps depend on the outcome of this assessment:

Secure

The assessment has confirmed the preferred policy.

Uncertain

There needs to be a high priority action to firm up the funding risk assessment so that the preferred policy can be confirmed.

If this is not immediately possible, there is a need to make explicit in the policy statement that there is uncertainty about the affordability of the policy. This can also be addressed by identifying funding as a policy indicator (see **Part 2, section 6 Management triggers**).

Unlikely

There is a need to review whether the preferred policy is realistic. This could lead to a change in timing (linked to indicators, (see **Part 2, section 6 Management triggers**), but in some cases could also change the underlying intent of management.

In such situations, there is a risk that the approach defaults to NAI, causing a risk of unmanaged failure and potentially catastrophic consequences. It will be important in such a case to fully reflect those potential consequences, consider how these could be mitigated, and explore whether the costs and benefits of this mitigation can help justify funding for bespoke intervention.

If the assessment shows that policy implementation is strongly dependent on non-FCERM GiA funding contributions, then this needs to be made very explicit to any stakeholders, and communication with potential funders needs to be planned and managed carefully.

8.5.4 Funding plans

In general, the funding risk assessment can form the starting point for a funding plan, which will be a document that develops and matures as implementation approaches.

The funding plan can feed into business cases for Grant in Aid but should also be produced to help set out key information required to attract other sources of funding.

9 Links with planning system

This section sets out guidance on how the interface between SMPs and the planning system can be maintained and strengthened through improved communication, to support decision making and help avoid inappropriate development. Guidance is provided on how engagement with planners can be improved, where required, through effective communication of risks, also highlighting some of the best practices where relationships between the SMP and the planning system are strongest.

9.1 General principles

Section 2.6 of the 2006 guidance provides general advice on 'Influencing the planning process on how land is used', with reference to the relevant legislation at that time. However, since the 2006 guidance, there have been new policy and guidance documents produced and the way in which coastal risk is managed by risk management authorities has also evolved.

Local developments plans (Local and neighbourhood plans) and Marine Plans are the core link between the non-statutory SMPs and the statutory planning system. Box 9.1 summarises the most relevant parts of the existing planning system. It is important that risks and opportunities identified by the SMPs are embedded within planning policy through the local development plans so that decisions are not made at the local level that could result in increased risk to people and property.

Box 9.1 The planning system in England

Plans pertaining to both the terrestrial planning system and the marine planning system are a statutory and material consideration for decision makers. National planning policies for terrestrial and inter-tidal areas in England are set out in The National Planning Policy Framework (NPPF), which was published in March 2012, after many of the second generation SMPs were completed. It was updated in July 2018 and again in February 2019. The NPPF provides the framework by which local development plans are produced.

Chapter 14 (paragraphs 148 to 169) of the NPPF specifically addresses how the planning system should address climate change, flooding and coastal change. This replaces earlier planning guidance, the PPS25 Supplementary Guidance on Planning and Coastal Change published in 2010. Although the NPPF does not specifically mention SMPs, the accompanying guidance does.

Local Plans are the key documents by which local planning authorities set out future development plans. There are clear links between the Local Plans and the SMPs. Both address needs, risks and opportunities in relation to housing, the local economy, community facilities and infrastructure and both are tasked with safeguarding the environment and enabling a sustainable response to climate change.

Marine Plans set out priorities and directions for future development within the marine plan area, inform sustainable use of marine resources and help marine users understand the best locations for their activities, including where new developments may be appropriate. They also provide guidance on things to promote or avoid for some locations. A public authority must take any authorisation or enforcement decision, capable of affecting the UK marine area up to MHWS (mean high water springs) in accordance with the marine plans. Decisions on the exercise of all other functions, that are not authorisation or enforcement (including developing or amending SMPs), must have regard to marine plans. These are legal requirements under Section 58 of the [Marine and Coastal Access Act 2009](#).

Whilst Local Plans and Marine Plans have a much wider remit than the SMPs and are statutory, the SMPs provide the additional information regarding coastal change and associated risks. At the local level, planning applications are determined in line with the Local Plan and Marine Plan (as outlined above), unless other material considerations indicate otherwise. The Local Planning Authority is generally responsible for making a decision on the proposal in the first instance.

The definition of Coastal Change Management Areas (CCMA) is the principal mechanism to achieve this. Box 9.2 explains the principles behind CCMA and the existing guidance that should be applied in developing them. CCMA are defined by the Planning System, not by the SMP Management Group. It is therefore vital that both the SMP management intent and associated risks from coastal erosion and flooding are clearly communicated.

Box 9.2 Coastal change management areas (CCMAs)

The National Planning Policy Framework (NPPF) states that Local Plans should identify CCMAs as ‘any area likely to be affected by physical changes to the coast’. This physical change may be through erosion, coastal landslip, permanent inundation or coastal accretion.

The ‘*Coastal Change Adaption Planning Guidance*’ (2015) provides all authorities with clear consistent guidance on the development of CCMAs, utilising data developed for the SMP. The guidance recommends a staged approach that starts with the policies and mapping in the SMP, integrating with other risk data to inform definition of the risk areas and based on that, the CCMA area itself.

National Planning Policy Guidance (NPPG) (*Guidance note on Flood risk and coastal change, 2014*) advises that coastal change management areas only need to be defined where rates of shoreline change are significant over the next 100 years and that they do not need to be defined where the SMP policy is to Hold the Line or Advance the Line. However, even along frontages where the policy is Hold the Line or Advance the Line, there often remains residual risk from flood and erosion. This risk could potentially increase over time, due to climate change, lack of funding for management policy delivery or other factors. Through proper consideration of the SMP, this should be recognised in local planning policy and development management decisions, and in some locations defining a coastal change management area will be the appropriate planning response. For example, this could be the case along coastlines prone to deep-seated landslides.

In some locations the overall extent of the CCMA may need to differ slightly from the calculated risk extents as defined in the SMP; for example, to address issues such as properties that are not within a CCMA becoming inaccessible when an access road is lost to coastal erosion. They might also include areas set aside for relocated properties outside the risk zone. It may therefore be appropriate to adjust the boundary of the CCMA to a more logical boundary (such as a road), even if this were more conservative than using the erosion or flood risk data alone. The use of additional buffers may also be appropriate, but these will need to be defined on a site-by-site basis.

A complementary approach for erosion prone areas is the use of coastal erosion vulnerability assessments (CEVA). In Suffolk, for example, the Local Plan sets out a requirement for coastal erosion vulnerability assessments within 30 metres landward of areas where the intent of management is to Hold the Line. In other locations, they are required as part of planning applications for all developments within a specified distance landward of a Coastal Change Management Area. CEVAs sit alongside other information already required by developers such as Geotechnical Assessments (Land Stability Assessments) and Flood Risk Assessments.

9.2 Addressing findings from the Health Checks

The SMP Refresh has identified no clear need for generic new guidance for SMP policy setting. However, the Health Checks have highlighted planning-related challenges for a number of policy units, and the relationship between planning, planners, and the SMP is quite varied across the country. The challenges concern locally specific development control issues or are recommendations for improved linkages between the SMP and the planning system.

The Health Check process has also identified areas where no CCMA exists for locations that might warrant one. In addition, any policy reviews arising from the Health Check or in the future may require the creation, or amendment, of CCMA's.

Guidance on improving links between the SMP and the planning system to help address these findings is covered below in **section 9.4**.

9.3 Assessing SMP policy changes

Links with the planning process are two-way. As such, where SMP policy is being reviewed and potentially changed, it is important that planning policies are taken into account.

Planners should therefore be directly involved in the SMP policy review process (see section 4.3) to ensure that any proposed changes to SMP policy:

- are informed by social and community aspirations identified in local development plans, and
- are incorporated as part of the rolling programme of local development plan.
- take account of longer-term planning aspirations and strategic regional plans.

The level of involvement requirement will vary from location to location and it may be that this can be addressed through the ongoing engagement discussed in **section 9.4**. Elsewhere more extensive consultation with planning officers may be required.

Following any change in policy, planners should be kept informed of any changes that could have an impact on the planning system. The SMP Status tracker can help to facilitate this (see **section 13**).

9.4 Improving communication of coastal risks

9.4.1 Involving planners in decision making

The 2006 SMP guidance recommended that planners were involved as part of the Client Steering Groups during development of the SMP. Typically, where this occurred, or where planners were an active stakeholder, the SMP outputs have effectively been used to inform planning policy and, in turn, development decisions.

There are many examples of good links between the SMPs and Local Planning Authorities. This has particularly been the case where the Local Planning Authority has dedicated planning and coastal engineering teams that are able to engage directly in both SMP development and its implementation. There are also good examples in

SMPs where there are predominantly flood risk areas, because here the local authority planners are typically the primary representative on any existing SMP group. However, in some locations, a high turnover of staff in planning departments has meant that original knowledge on the SMP has been lost (as is the case for other partner organisations).

It is therefore important that planners are (re-)engaged in the process, as the findings from the Health Checks are progressed and through the ongoing process of shoreline management planning.

Each SMP Management Group should consider establishing (or maintaining) a framework for ongoing engagement of the relevant planning and development management teams within Local Planning Authorities within their area.

As part of this, it may be useful to hold regular workshops at the SMP level, involving planners and engineers. These could be used to review and discuss issues arising at the coast, to progress with SMP implementation, and to promote ongoing cross-communication. There are good examples of similar approaches for engaging relevant Elected Members of Planning Authorities in this way.

9.4.2 Keeping the SMP current

Typically, the evidence base that informs planning policy has to be dated within 5 years or it is considered out of date, which has been an issue when the current SMPs reached that age.

The future intent is for SMPs to remain 'living documents'. This will be through updates to the SMP digital platform and recording of policy or SMP document changes in the SMP Status Tracker (see **section 13**), the latest date of which should be recognised for current SMP dating. As such the SMPs will remain a 'material consideration' in all planning decisions along the coast.

9.4.3 Clarifying policy intent

The technical nature of SMPs can make the translation of their policies challenging as SMP policies are specifically defined as engineering interventions (No Active Intervention, Hold the Line, Managed Realignment or Advance the Line) rather than planning type recommendations.

To address this, **section 5** sets out how the policies used in the SMPs should be expanded using sub-categories, to make them more accessible to the wider stakeholder community, including local planners and development management officers.

9.4.4 Risk mapping

The mapping of risk zones (flooding, erosion, or instability) is a key SMP output utilised in planning documents, definition of CCMA's and decision-making.

There is a need for risk zones to be regularly reviewed and systematically updated, so that planning documents remain valid. The frequency of review will vary from location to location: frontages with rapid erosion require a more frequent review, for example on a 3-yearly basis. In addition, any data that emerges from a review of SMP policy should feed into the maps.

This information should be maintained on (or linked via) the SMP digital platform to ensure those accessing data are using the latest available.

9.4.5 A planners' guide to the SMP

Some local authorities have developed planning guidance documents designed to explain the link between SMPs and the planning system and to provide consistent planning advice along the coast. Examples include:

- West Dorset, Weymouth & Portland Coastal Risk Planning Guidance (2013)
- Scarborough Planner's Guide: North Yorkshire Coast Shoreline Management Plan - what it means for the Scarborough Local Development Framework (2010). See Box for an excerpt from this guide.

These can be an effective way to communicate key messages from the SMP in a concise and focused form to raise awareness. Where the Health Check has identified the need for improved uptake of the SMP by planners, development of this form of guide may help address that.

Whilst the form of these will vary, they can:

- Explain the purpose of SMPs and the links with the planning system;
- Explain how the SMP policies for the area integrate with the planning process (also see Box 9.1), including identification of potential coastal change management areas (see below);
- Recommend that SMPs are referenced in Local Plans (if not already);
- Provide links to relevant sections within the SMP;
- Identify SMP data to be integrated into appropriate Planning GIS systems;
- Provide key contact details.

Box 9.3 Example excerpt from a SMP for Planners Guide

The local issues – an integrated response.		
The area and the issues	SMP response	Planning response
Staithes - Potential outflanking of the harbour structures - Increased flood risk - Disruption to use of the harbour area.	<ul style="list-style-type: none"> • Hold the Line to the village • Monitoring of erosion of the cliffs • Monitoring sea level rise • Develop a coast protection strategy 	<ul style="list-style-type: none"> • Examine the needs for sustained use of the harbour; <i>potential CCMA</i>. • Ensure integration with coast protection. • Improve flood resilience of property.
Runswick Bay - Continued pressure for erosion. - Potential impact on nature conservation.	<ul style="list-style-type: none"> • Limit Hold the Line to currently defended frontage. • The possible need to realign areas of defence • No active intervention along adjacent frontages 	<ul style="list-style-type: none"> • Development control with respect to the village, <i>potential CCMA</i>. • Adaptive response to loss of properties.
Sandsend - Loss of beach due to coastal squeeze - Increased flood risk from overtopping - Management constrained by coastal road.	<ul style="list-style-type: none"> • Hold the Line to the main village. • Possible need to extend management to the north • Opportunity to realign defence to the south • No additional defence to the Golf Course 	<ul style="list-style-type: none"> • Identify future planning need for village; <i>potential CCMA</i>. • Consider options for realigning coastal road, together with impact of village.
Whitby - Continuing loss of beach, pressure at northern end. - Flood risk within harbour.	<ul style="list-style-type: none"> • Hold the Line to the town. • Realign defence at northern end. • Highlights the importance of the Piers 	<ul style="list-style-type: none"> • Development control at the Upgang Beck so as not to constrain future realignment; <i>potential CCMA</i>. • Integrated approach to development of the harbour and piers.
Robin Hoods Bay - Increased pressure for erosion. - Potential loss of property to north of village. - Continuing cliff instability and erosion to south of village.	<ul style="list-style-type: none"> • Underlying principle to maintain natural processes. • An exception made to protect integrity of the village. • Intent to limit further extension of defences • Does not preclude local management of retreat to the south of village. 	<ul style="list-style-type: none"> • Define the spatial context of the village and hence the need for protection works; <i>potential CCMA</i>. • Planning measures to promote adaptation. • Planning assistance to promote adaptation over the southern section of the bay; <i>potential CCMA</i>.
Scarborough North Beach - Loss of beach area and amenity. - Increased overtopping	<ul style="list-style-type: none"> • Hold the Line for the frontage • Identifies the potential to maintain the beach and reduce overtopping through local defence approach 	<ul style="list-style-type: none"> • Establish a framework for future development; • Involve potential developers in the decisions as to how defences might be configured through joint funding.
Scarborough South Beach - Increased pressure on the Spa. - Increased overtopping affecting the sea front.	<ul style="list-style-type: none"> • Hold the Line with the opportunity for Advance the Line. • The need to maintain width along the sea front. 	<ul style="list-style-type: none"> • Integrated framework for redesigning use of the frontage. • Planning measures to promote adaptation along the sea front;
Cayton Bay - Continuing instability of coastal slope. - Loss of access	<ul style="list-style-type: none"> • Within an overall policy of No Active Intervention there is opportunity for managing the retreat of existing defences. 	<ul style="list-style-type: none"> • Adaptive response to loss of properties; <i>potential CCMA</i>. • Support continued amenity use of the foreshore.
Filey Bay - Loss of beach area and amenity at Filey. - Continuing instability of coastal slope.	<ul style="list-style-type: none"> • Hold the Line at Filey but with the potential need for joint funding. • No Active Intervention to Flat Cliffs. 	<ul style="list-style-type: none"> • Integrated framework for use of Filey sea front. • Adaptive response to loss of properties; <i>potential CCMA</i>.

9.5 Key documents

The following key policy and guidance documents are relevant to SMPs and terrestrial planning and may provide further background and useful information (correct at time of writing, August 2020).

National Planning Policy Framework (NPPF) (MHCLG, 2019)

Chapter 14 of the framework deals with “Meeting the challenges of Climate Change, Flooding and Coastal Change”, of which sections 166 to 169 deal specifically with coastal change. Available on-line at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

National Planning Policy Guidance (NPPG) (MHCLG, 2014)

Includes a section on Flood Risk & Coastal Change produced in 2014 that includes guidance on the following topics:

- What is the general planning approach to development and coastal change?
- Why it is important to apply Integrated Coastal Zone Management
- Coastal Change Management Areas
- Permitted development rights in areas at risk from coastal change.

Available on-line: <https://www.gov.uk/guidance/flood-risk-and-coastal-change>.

Coastal Change Adaption Planning Guidance (Halcrow, 2015)

Provide a consistent approach to the development of CCMA in England, drawing on good practice examples tested in the 2009-2011 Defra Coastal Change Pathfinders, plus other UK and international experience.

Available on-line via the LGA Coastal SIG site:

<https://lgacoastalsig.com/resources/coastal-guidance-and-manuals/>

25 Year Environment Plan (Defra, 2019)

This is discussed in **section 2**.

National Flood and Coastal Erosion Risk Management Strategy for England (Environment Agency, 2020)

This is discussed in **section 2**.

National Trust Shifting Shores and National Trust Shifting Shores +10 (National Trust, 2015)

A National Trust commissioned study that includes a review of coastal change management in England, Wales and Northern Ireland. One of the key outputs is a report on “Public Policy and Adaptive Approaches”.

Available on-line via the LGA Coastal SIG site:

<https://lgacoastalsig.com/resources/coastal-guidance-and-manuals/>

Natural England Coastal Change Management Areas Opportunities for sustainable solutions in areas subject to coastal change (NECR275) (Royal HaskoningDHV, 2019)

Natural England commissioned study that has reviewed use of CCMA's and makes recommendations for additional CCMA's to include those where the current (first) SMP epoch option is Hold the Line but where the second epoch option is either Managed Realignment or No Active Intervention.

Available on-line:

<http://publications.naturalengland.org.uk/publication/6167783398440960>

Marine and Coastal Access Act 2009

The NPPF states that development within a Coastal Change Management Area should not hinder the creation and maintenance of a continuous signed and managed route around the coast, as set out in the Marine and Coastal Access Act. This is covered by Part 9 of the Act.

Available on-line: <https://www.legislation.gov.uk/ukpga/2009/23/contents>

10 Responding to change

This section discusses approaches to responding to coastal change, including the development of response plans to support the process of managed transition arising from SMP policy.

10.1 Background

A factor of critical importance in delivering the SMP is response to coastal change. This may involve planning for relocation of communities, infrastructure and other features where the SMP management intent is to not to continue to defend. Typically the need to accept and manage change is the outcome from Managed Realignment or No Active Intervention policies, but even where an SMP defines a long-term policy of Hold the Line, there may be a need for on-going planning for change, for example in response to increasing flood risk or beach loss.

Until recently, this was captured within SMP-related discussion by the term 'adaptation', but this term is now starting to be used consistently for the much broader concept of response to climate change. Defra's FCERM Policy Statement and the Environment Agency's National FCERM Strategy now refer to the term 'managed transition'.

10.2 Available guidance

There is currently no dedicated policy or guidance framework to support the practical delivery of managed transition at the coast. The Government's National Adaptation Programme recognises that planning for change and relocation on the coast is needed, and a series of Coastal Change Adaptation Pathfinders undertaken in 2010-11 explored and trialled some of the practical, planning and engagement techniques and considerations. This also established the Defra Coastal Erosion Assistance Grant, administered by the Environment Agency, which contributes towards demolition and limited removal costs associated with properties at imminent risk. However, the legal, policy, planning, engagement and broader financial tools available to authorities (as both RMAs and Local Planning Authorities), and guidance on their practical application, have not been further developed to date.

A key conclusion emerging from Defra's Coastal Change Pathfinder Projects was that not all adaptation techniques are fully transferrable. As such the process of planning for change and relocation is very much one of exploration of ideas regarding funding and delivery options - some of which may not be universally successful.

To a degree, broader implications of coastal change are considered through planning policy. Paragraph 167 of the National Planning Policy Framework relates to formally making provision in Local Plans for relocation of development and habitat affected by coastal change. But this relates quite specifically to the planning of compensatory areas for development within the broader area (e.g. maintaining the housing stock) or the need for compensatory habitat.

In several local authorities, local planning policy underpins and aims to facilitate planned change or relocation or mitigate its consequences, such as in the East Riding of Yorkshire, North Norfolk and Dorset. These authorities have planning (rather than SMP) policies to help mitigate the impact on individuals at risk of losing their homes and on maintaining community coherence. However, there are only a few locally

specific initiatives that consider the actual process of responding to change at the local scale.

This situation is evolving, with both Defra's FCERM Policy Statement (Policy Area V) and The Environment Agency's National FCERM Strategy (Strategic Objective 1.3) specifically referring to enabling 'managed transition'. See Box .

Box 10.1 National Strategy statements about planned change or relocation ('transition')

Defra's FCERM Policy Statement (Policy Area V):

In areas facing significant coastal erosion and impacts from rising sea levels, to limit impacts and unlock the advantages our coastline brings, local areas may determine that a managed transition away from high risk areas is the most effective and practical response. The government is committed to enabling this transition by supporting local areas to help them to implement long-term plans.

Action: We will explore the availability and role of financial products or services that can help people or businesses to achieve a managed transition of property and infrastructure away from areas at very high risk of coastal erosion.

Action: We will review the current mechanisms – including legal powers – which coastal erosion risk management authorities can use to manage the coast.

The Environment Agency's National FCERM Strategy (Strategic Objective 1.3):

From 2020 risk management authorities will support coastal communities to transition and adapt to a changing climate, where the scale and pace of future flooding and coastal change is very significant.

10.3 Informing this process

A key finding of the Health Checks is the need for response plans (noting these are what would currently be referred to in the SMPs as 'adaptation plans') to support the process of managed transition.

Whilst the form of these will vary, they should explain:

- Why a response plan is needed. This could be due to increasing risk, lack of funding, avoidance of impact or opportunity for enhancement, legislative requirement.
- What is the proposed response. This could be to reduce risk, increase resilience, avoid impact, to creating opportunity, avoid an unsustainable form of management.
- What will be changing. For example defences being removed, change in infrastructure, property loss, loss of community coherence, creation or loss of habitat.
- What needs to be addressed through planned response, and over what timescales.

Note that this is not part of the remit of the SMP or SMP Management Group to produce, but they have a key role in identifying and communicating where this need exists (see **section 9.4**), and members of the Group may be involved in its development.

Evidence shows that the earlier the need to accept and manage change is raised with communities and other stakeholders, the greater the possibility of achieving a successful outcome. The SMPs are the starting point in this process by triggering the process of planning for change, even if actual change in how an area is managed will only be triggered by certain conditions well into the future. The Health Checks help identify where such engagement is needed.

A range of good practice guidance on stakeholder engagement already exists (see Box). It is important to recognise and plan for the fact that more complex and dynamic situations such as these can take many years to work through to final conclusion.

It can also be challenging to maintain effective engagement as stakeholders change over time. Therefore, there is a need to keep under constant review: who your stakeholders are, how you need to engage with them and what resources are needed to do this.

Box 10.2 Available guidance on good stakeholder engagement practices

Key reports available on stakeholder engagement include:

- Environment Agency (2013). Working with Others: A Guide for Staff.
- Defra/Environment Agency (2009). Understanding the Processes for Community Adaptation Planning and Engagement (CAPE) on the Coast.
- Living with a Changing Coast (LiCCo) project (2015). Coastal Change Engagement Toolkit: A stage by stage guide.
- Corner et al (2015). The Uncertainty Handbook: A Practical Guide for Climate Change Communicators.

10.4 Ongoing shoreline management

The SMP Refresh introduces a new approach to planning for change, where this process is driven by the definition of management triggers. Through the use of triggers, there is greater transparency over the timing of policy transitions and the consequences of those, enabling the necessary planning and actions to be put in place at the right times to support that.

Sections 3 and 6 provide more detailed guidance on the recommended shift in emphasis for SMP management and the use of triggers.

Where SMP policy is being reviewed and potentially changed, the impact on communities and stakeholders will be assessed as part of the validation of the preferred policy. Most policy reviews will require wider consultation, which is an opportunity to start early dialogue with potentially affected communities and stakeholders. Where a change in policy is confirmed, the need for a response plan should be established, together with the identification of associated triggers to inform it.

11 Protected sites

This section provides direction on how protected sites should be taken into account in responding to the Health Checks findings and in ongoing shoreline management planning to facilitate improvement and maintenance of site condition at a policy level and to remain compliant with legislative provisions.

11.1 Background

The principal focus of this section is on nature conservation sites and the following protected sites are considered:

- designated and candidate Special Areas of Conservation;
- classified and potential Special Protection Areas;
- Ramsar sites; and
- Sites of Special Scientific Interest (SSSI).
- Marine Conservation Zones (MCZ)

There is a need for SMPs to also take account of landscape and historic environment protected sites, as set out in the 2006 SMP Guidance. These, together with other environmental drivers such as net gain and wider environmental initiatives, are therefore considered at the end of this section, in **sections 11.4.3** and **11.4.4**.

11.2 Changes in guidance or legislation

11.2.1 National policy and guidance

There have been no changes in national policy and guidance that would require SMP Groups to provide a wholesale shift in current SMP policy. Similarly, there is no evidence that suggests that the approach to protected sites taken by the SMPs was inappropriate or ineffective. Indeed, the more recent guidance from Natural England, *Natural England's Advice to Public Bodies on SSSIs (2016)*, and the National Planning Policy Framework (2019a) reinforce the approaches that were carried out by the SMPs. Box 11.1 outlines existing guidance and legislation.

New national strategies and initiatives will have a bearing on future consideration of protected sites. **Section 2** discusses the relationship of SMPs to Defra's Flood and Coastal Erosion Risk Management (FCERM) Policy Statement and the Environment Agency's National FCERM Strategy for England (both July 2020), which also encompass and reference relevant parts of other important policy documents such as the Government's 25 Year Environment Plan.

The *25 Year Environment Plan* sets out the government's plan for improving the environment. It specifically embeds the principle of environmental net gain for development and promotes a 'natural capital' approach to making long-term decisions. The Plan also identifies a key area of action to establish a Nature Recovery Network. These environmental drivers are discussed further in **section 11.4.5**. The Environment Bill (2020) will act as a key vehicle for delivering the vision set out in the 25 Year Environment Plan by setting legally-binding environmental targets.

Box 11.1 Current guidance and habitats legislation

Under Regulation 63 of the Conservation of Habitats and Species Regulations (2017 as amended), if a proposed project cannot satisfy that it is 'necessary for management of the site', where the measures are directly linked to the site's Conservation Objectives, and is likely to significantly affect the European site or European Protected Species, the Competent Authority must undertake an 'appropriate assessment' or 'Habitats Regulations Assessment (HRA)' (Regulation 63(1)). These provisions also apply to marine Special Protection Areas (SPAs) and Special Areas for Conservation (SACs), and to Ramsar sites.

Guidance on undertaking Habitat Regulations Assessments has been updated since the SMPs, with recent guidance available from *Ministry of Housing, Communities and Local Government (2019b)*, which includes advice on case law (see below). Other representative guidance is also available, for example *The Planning Inspectorate (2017)* and *Ministry of Defence (2019)*. The Habitats Regulations Assessment Handbook (Tyldesley and Chapman, 2013) also provides detailed guidance but is only available on a subscription basis (see <https://www.dtapublications.co.uk/>).

There have been minor amendments to the relevant habitats legislation. The key documents are as follows:

- the *Conservation of Habitats and Species Regulations 2017, as amended* (note that from January 2021 the 2017 regulations will be replaced by Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019);
- the *Conservation of Offshore Marine Habitats and Species Regulations 2017, as amended*; and
- *Wildlife and Countryside Act 1981, as amended*.
-

Also since the SMPs were produced, MCZs have been designated and are subject to their own assessment process – see **section 11.4.3**.

11.2.2 Case law

New case law has emerged since the SMPs which has a direct impact on HRAs (see Box).

On the basis of this new case law alone, a retrospective SMP-scale reappraisal of all existing HRAs is not necessary, although for individual SMPs and Policy Units RMAs should be guided on local requirements by the SMP Health Checks and on advice from Natural England. The implications of these rulings will need to be taken into consideration when both (a) existing SMP policies are taken forward to implementation through coastal strategies or projects and (b) if the SMP Refresh process results in a change in any SMP policy, which is discussed in **section 11.4**.

Specifically, in HRAs scrutinised in relation to SMP changes or produced to support strategies / projects, any measure designed to avoid or mitigate harmful effects on the

site must now be clearly considered and evaluated at the appropriate assessment stage (stage 2) and any habitat creation proposals to offset a loss of habitat must now be considered as compensatory, not mitigation, measures.

Box 11.2 Implications of new case law since the SMPs

New case law has emerged since the SMPs, specifically Court of Justice of the European Union (CJEU) case C-323/17 (*People Over Wind, Peter Sweetman v Coillte Teoranta*) and case C521-12 (*T.C. Briels and Others v Minister van Infrastructuur en Milieu*).

In very simple terms, the judgements clarified that in deciding whether an appropriate assessment is required at the Screening Stage, competent authorities cannot take into account any mitigation measures included in a plan or project in order to protect a European Site. The effect of such measures can only be considered by an appropriate assessment.

This ruling differs from approaches taken previously in the UK whereby mitigation measures could be taken into account at the screening stage. In addition the provision of additional habitat to mitigate for a loss of habitat within a site has been judged to be a compensatory measure that cannot lead to the conclusion that the plan or project will not adversely affect the integrity of the site concerned as defined under Article 6(3) of the Habitats Directive. Compensatory measures cannot be taken into account at the appropriate assessment stage, and only form part of the derogation provisions included in the Regulations e.g. regulation 68.

11.2.3 Compensatory sites

An additional change since the SMPs is that the following should be given the same protection in planning policy as 'habitats sites' (i.e. any site included within the definitions of regulation 8 of the Conservation of Habitats and Species Regulations 2017, including Sites of Community Importance, candidate SACs and MCZs):

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

This is set out in the National Planning Policy Framework, paragraph 176.

These sites will therefore need to be taken into account where changes in SMP policy are identified (as part of the SMP Refresh process or ongoing thereafter). RMAs should be guided on local requirements to investigate where existing SMP policies may affect the sites listed above by the SMP Health Checks and on advice from Natural England, using the latest information on identified compensation sites from the Habitat Compensation Programmes lead in their region.

11.3 Addressing findings from the Health Checks

11.3.1 Changes to designations

A number of protected sites have been amended or extended since adoption of the SMPs, and new sites designated. The Health Checks have identified policy units where these changes occur.

In general, changes to designations will not automatically warrant a review of SMP policy. But the changes will need to be considered by any projects developed to implement the plan and could have implications for delivering policy, for example a Hold the Line policy could lead to habitat loss. This could trigger a need to revisit the SMP policy itself, which could lead to a formal policy change.

However, in some SMPs, given the extent of area potentially affected by designation changes, it is recommended that a high level assessment of the potential implications on SMP policy across a wider frontage should be carried out.

Other Health Check findings will also lead to a review of policies and within the Health Checks it has been highlighted in relevant policy units where findings have environmental implications. It is essential that protected sites are appropriately considered as part of the review process, taking account of changes to site extent, protected features or condition. Further guidance is provided below.

11.3.2 Delivering statutory environmental requirements

In a number of locations, protected sites affect implementation of SMP policy; for example in some locations a Hold the Line policy relies upon the provision of compensatory habitat. The Health Checks have identified where these situations occur and actions to address these.

Where loss of intertidal habitat was calculated to inform the need or ambitions for habitat creation as part of SMP development, sea level rise scenarios based on specific projections have been a key consideration. **Section 7** provides further guidance on how climate change is and should be accounted for within SMPs, outlines how existing SMPs take account of climate change in line with the predictions in existing guidance.

Section 7 highlights that changes in climate change guidance do not warrant a wholesale review of the SMP: on the same basis, a wholesale review of the SMP HRA is not required. However, **Section 7** does recommend that in reviewing SMP policy, future climate change is appropriately considered as part of the process. This may therefore affect determinations of compensatory habitat associated with any change in policy and may therefore affect policy decisions across a wider area. Evidence from the Habitat Compensation Programme supporting significant changes to projections of habitat loss across protected sites may also affect SMP policy decisions.

11.3.3 Habitat Compensation Programme

The Environment Agency's Habitat Compensation Programme (HCP) (formerly known as the Regional Habitat Creation Programmes) plays a key role in the delivery of habitat to offset habitat losses to European sites resulting from building and maintenance of FCERM assets and operations. The Programmes were a condition of final approval and adoption of the SMPs and should inform, and be informed by, ongoing shoreline management planning. As such, any review of SMP policy should

also take account of changes in evidence, and this should subsequently be taken into the HRA update / revision if required.

The Health Checks highlight that longer-term provision of further compensatory habitat in some areas will become increasingly challenging due to the constraints on implementing managed realignment projects. Across a number of SMPs the need to re-establish links with the HCP is recommended, such as through involvement of relevant staff on SMP Management Groups. In some locations this will involve reinvigorating the programme, particularly where an increasing requirement for habitat compensation has been identified.

11.4 Assessing SMP policy changes

Section 4.3 describes the refreshed SMP policy review process that needs to be undertaken if a policy change is proposed, and includes an overview of the environmental assessments required. This section provides more detailed advice on the approach to be taken for protected sites, including those related to landscape and the historic environment.

11.4.1 International sites

Habitats Regulations Assessment (HRA) refers to the several distinct stages of assessment which must be undertaken in accordance with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (from January 2021) to determine if a plan or project may affect the protected features of a European site) before deciding whether to undertake, permit or authorise it. **Section 11.2.3** highlights additional sites afforded the same protection and HRA requirements in the National Planning Policy Framework.

Where formal changes in SMP policy are proposed, a consideration of the potential impacts arising from the proposed change on European sites and protected species will be required. The competent authority will decide whether a Habitats Regulations Assessment (HRA) is required and carry this out with support from the SMP group as appropriate. Natural England can provide advice as a member of the SMP group. The competent authority also has a statutory duty to consult Natural England on the Appropriate Assessment. The HRA should not only consider those sites within the policy unit or units under review but should also consider whether a change in policy could have wider scale effects on coastal processes and therefore European site features remote from the policy unit(s).

Where the Health Check recommends revisiting SMP policy for a number of policy units these should be considered together as there may be additional 'in combination' impacts.

Once it has been determined that consideration of European sites and European Protected Species is required, the staged HRA approach should be followed in line with the latest guidance (see Box), with further consultation with Natural England and the Environment Agency required at each stage of the process. This will need to take account of the change in case law discussed in **section 11.2.2**, and any future updates to case law, policy and guidance. Consideration should also be given to the ecological and functional relationship between coastal sites and any new Marine Conservation Zones in the area (also see **section 11.4.3**).

A proportionate approach is recommended, which should consider whether a limited update focused on the specific policy units and their impact area is appropriate or whether a more substantial rewrite of the current SMP HRA is required. This will need

to consider whether earlier assessments are now outdated, for example due to further information or changes in the site condition. Early consultation with Natural England is advised to help reach a decision on the appropriate approach. The conclusion from this will affect the level of new appraisals needed to fulfil requirements of all stages of the HRA process.

If the change to SMP policy is driven solely to be ‘necessary for management of the site’ where the measures are directly linked to the site’s conservation objectives, it may be possible to conclude at stage 1 screening that no further consideration is required. However, this is rarely the case, especially where there are overlapping sites which may have conflicting objectives. The advice of Natural England should be sought and a case by case agreement with the Competent Authority will be necessary.

The outcome from the HRA should be fed back into the Habitat Compensation Programme.

Latest mapping and information on international designated sites is available as follows:

- Magic website (<https://magic.defra.gov.uk/>);
- Natural England Open Data Geoportal (<https://naturalengland-defra.opendata.arcgis.com/>); and
- Natural England’s advice on conservation objectives for both European terrestrial sites and European marine sites (<https://designatedsites.naturalengland.org.uk/>).

Box 11.3 Stages in the HRA process in relation to SMP policy change

HRA Stage	Description of HRA Stage
Stage 1: Screening	Identifies whether a formal change in SMP policy is likely to have an impact on a Natura 2000 site, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.
Stage 2: Appropriate Assessment	Assesses what any significant impacts of the proposed change identified in stage 1 might be with respect to the site’s structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential <i>mitigation</i> of those impacts within the site boundary.
Stage 3: Assessment of Alternative Solutions	Assessment of alternative solutions — the process which examines alternative ways of achieving the objectives that prompted the proposal to change SMP policy that avoid adverse impacts on the integrity of the European site. Such alternative solutions may involve revisiting SMP policies elsewhere or revising the SMP policy change proposal.
Stage 4: IROPI	Assessment where no alternative solutions exist and where adverse impacts remain — an identification of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), the Secretary of State (SoS) decides that the project or plan should proceed.

11.4.2 SSSIs

Since the SMPs were produced, there have been changes in SSSI designations and site condition. Changes to SSSI designations alone will not necessarily warrant a review of SMP policy. But, as with internationally protected sites, they will need to be considered by any projects developed to implement the plan and could have implications for delivering policy. This could trigger a need to revisit the SMP policy itself, which in turn requires a formal policy change. Such locations have been identified in the Health Checks.

Where changes in SMP policy are identified (as part of the SMP Refresh process or ongoing thereafter) SSSIs will need to be assessed, as part of the overall SMP policy review process (see **section 4.3**), to ensure the policy change does not lead to a conflict with the management objectives of the designated site. Many SSSIs underpin a SAC/ SPA and this exercise would be captured within the procedure described in **section 11.4.1**, although they may include additional features that need to be considered.

Opportunities to restore or improve the site are an integral part of this process as public bodies have a duty to further the conservation and enhancement of SSSIs. SMPs should therefore aim to restore SSSIs to favourable / recovering condition, where possible. Early consultation with Natural England as part of the policy review process is recommended to help identify such opportunities.

In addition to the resources identified for international sites, for SSSIs, the *Designated Sites database* (<https://designatedsites.naturalengland.org.uk/>) should be used to find out about the activities that are likely to damage a specific site.

11.4.3 Marine Conservation Zones (MCZ)

Since the SMPs were produced, Marine Conservation Zones have been designated. They are areas that protect a range of nationally important, rare or threatened habitats and species. There are 91 MCZs in waters around England and their locations can be found on [JNCC's interactive map](#).

Changes to MCZ designations alone will not necessarily warrant a review of SMP policy. But, as with internationally protected sites, they will need to be considered by any projects developed to implement the plan and could have implications for delivering policy. This could trigger a need to revisit the SMP policy itself, which in turn requires a formal policy change. Where changes in SMP policy are identified (as part of the SMP Refresh process or ongoing thereafter) MCZs will need to be assessed, as part of the overall SMP policy review process (see **section 4.3**), to ensure the policy change does not lead to a conflict with the management objectives of the designated site. A MCZ assessment process has been integrated into existing marine licence decision making procedures. A [factsheet](#) on the assessment has been produced by the Joint Nature Conservation Committee and Natural England.

11.4.4 Other environmental considerations

Where changes in SMP policy are identified a tailored environmental assessment will be required, as part of the overall SMP policy review process (see **section 4.3**).

The existing SMP Strategic Environmental Assessment (produced for all but one of the SMPs) may remain appropriate as a baseline, but it is likely that this will require

updating to take account of changes, including updates to environmental characteristics, since the SMP.

Table 11.1 summarises the latest guidance available and the assessments to be undertaken in relation to other protected sites and areas. General advice on completing SEAs is available, e.g. the UK Practical Guide to the SEA Directive (ODPM, 2005).

Table 11.1 Consideration of other protected sites and areas		
Latest guidance	Retrospective SMP review required?	Assessment required where changes in SMP policy identified
National Nature Reserves (NNR)		
<p>Government policy is set out in: https://www.gov.uk/government/collections/national-nature-reserves-in-england.</p> <p>Includes a link to Natural England's 2017 publication: "<i>National Nature Reserves: At the heart of conservation in the 21st Century</i>".</p>	All NNRs are notified as SSSIs so will be considered as part of the process relating to SSSIs above.	
Nationally protected historic buildings and sites		
<p>Government policy is set out in "<i>Scheduled Monuments & nationally important but non-scheduled monuments</i>" (Department for Culture, Media and Sport, 2013).</p>	No – latest policy does not change approach adopted in SMPs.	<p>Identify any new or changes to designations, including new World Heritage Sites (WHS) (taking account of buffer zones).</p> <p>Update current SMP baseline.</p> <p>Appraise impact of policy changes on all sites.</p> <p>Consult with Historic England</p> <p>Resources:</p> <ul style="list-style-type: none"> • <i>World Heritage Site management plans.</i> • <i>National Heritage List for England (NHLE).</i> • <i>Magic website: Designations layer.</i>
National Parks		
<p>Two national policy position statements have been made since the SMPs:</p> <p><i>The Climate Change Position Statement</i> (National Parks England, 2019) - highlights key</p>	<p>No – position statements do not change approach adopted in SMPs.</p> <p>National Park management plans</p>	<p>Consider current National Park management objectives.</p> <p>Consult with relevant National Park Authority.</p> <p>Resources:</p>

<p>approaches to adaptation/resilience to flooding and erosion.</p> <p><i>Sustainable Tourism Position Statement</i> (National Parks England, 2013).</p>	<p>are reviewed every 5 years so should account for SMP.</p>	<ul style="list-style-type: none"> • <i>National Park management plans.</i> • <i>Magic website:</i> Countryside Stewardship Targeting & Scoring Layer.
<p>Areas of Outstanding Natural Beauty (AONB)</p>		
<p>No national policy changes. One AONB has been extended (the Suffolk Coast and Heaths AONB).</p> <p>Work has been ongoing on 70 nature recovery solutions relating to AONBs (see The National Association Areas of Outstanding Natural Beauty, 2020).</p>	<p>No – AONB management plans are reviewed every 5 years so should account for SMP.</p>	<p>Consider current AONB objectives.</p> <p>Consider any nature recovery sites that could be affected.</p> <p>Consult with the relevant AONB partnership, but note that the relevant local authority remains responsible for making decisions on proposals.</p> <p>Resources:</p> <ul style="list-style-type: none"> • <i>AONB management plans.</i> • <i>Magic website:</i> Countryside Stewardship Targeting & Scoring Layer.

11.4.5 Other environmental drivers

Net Gain and wider environmental initiatives

Net gain refers to both biodiversity net gain and wider environmental net gain. Net gain is described by the National FCERM Strategy as an “*approach to development that aims to leave the natural environment in a measurably better state than it was before*” and is embedded within the Government’s 25 Year Environment Plan.

There is currently no firm (or legal) mechanism for making net gain an explicit driver in shoreline management and no specific guidance on how net gain can be addressed at a strategic level. Net gain may not have a direct bearing on SMP policy decisions (where a policy review has been identified as part of the SMP Refresh process or ongoing thereafter), but will need to be specifically addressed when projects arising from the SMP come to be developed and delivered.

That said, in addressing actions set out in the Health Checks, it is recommended that opportunities for net gain should be considered and highlighted as part of looking for wider environmental opportunities. The government’s ambition is for more nature-based solutions to deliver wider benefits including restoring nature, and the national FCERM strategy urges RMAs to achieve net gain through their operations. Biodiversity net gain will also become a mandatory condition (as set out in the draft Environment Bill) for certain developments.

It is important to note that addressing impacts to international and national protected nature conservation sites cannot be considered as part of the biodiversity net gain process. However, it is recommended that opportunities for local scale restoration and

enhancement should be considered alongside projects in the Habitat Compensation Programme to enhance and connect legally protected sites with net gain restoration initiatives.

A useful resource is “*Identifying sites suitable for marine habitat restoration or creation*” (Marine Management Organisation, 2019), which provides a national dataset of sites that can all be used to help searches for potential restoration or creation sites.

Natural England published a Biodiversity Metric in 2019 which included a specific intertidal habitat metric (available from <http://publications.naturalengland.org.uk>). This is still under development and there is currently no guidance on how this may be used at a strategic level. It is unlikely to affect SMP policy, but will be appropriate when developing schemes. Outcome Measure 4 also rewards FCERM scheme proposals that include environmental enhancements.

Local Nature Recovery Strategies

The establishment of a Nature Recovery Network was a key action identified in Defra’s 25 Year Environment Plan to benefit people and wildlife by restoring, increasing and joining-up wildlife-rich places across England. Natural flood management is identified in the Plan as a key opportunity for nature recovery. As part of achieving a thriving network, the government intends there to be a set of statutory local nature recovery strategies (LNRS) covering the whole of England, as set out in the draft Environment Bill.

Natural England has produced guidance to support practitioners: *Nature-Networks – a summary for practitioners* (Natural England, 2020). This is a quick reference guide to support the development of Nature Networks. Both this and a more detailed Evidence Handbook are available from: <http://publications.naturalengland.org.uk>.

The principle of a ‘network way of thinking’ rather than concentrating on sites in isolation is consistent with the approach already taken in developing the SMPs and SMPs remain an important strategic mechanism for identifying opportunities for nature recovery at the coast, especially when used alongside other planning documents relating to the coastal zone. Information already within the SMPs and that gathered as part of the SMP Refresh process, or ongoing thereafter, will contribute to the creation of nature networks, although a direct interface is yet to be developed.

Once the Nature Recovery Network is established, the Local Nature Recovery Strategies should be taken account of in any SMP policy review to ensure that policies do not conflict with objectives set out by the networks but instead support the principles behind the networks.

Carbon impacts

Following UK legislation passed in June 2019 to reach net zero greenhouse gas emissions by 2050, local authorities and the Environment Agency are working to reduce the carbon and environmental impact from the construction and operation of flood and coastal defences.

The EA has developed a Carbon Modelling Tool which provides a top-down whole life carbon assessment and optioneering approach. This is intended to be used during project appraisal phase, with results from the Tool a mandatory input into all Outline Business cases (OBCs) submitted to the EA. There is currently no guidance on how carbon impacts should be addressed at a strategic level.

Consideration of carbon mitigation or offsetting is unlikely to have a direct bearing on SMP policy decisions (where a policy review has been identified as part of the SMP

Refresh process or ongoing thereafter), but will need to be specifically addressed when developing and delivering projects arising from the SMP.

However, as Risk Management Authorities develop their approach to achieving net zero, strategic assessments of mitigation and offsetting opportunities at the coast during policy changes may be beneficial with reference to the SMP and its associated habitat programmes, as well as support future projects arising from the SMP.

12 Relationship to other plans

This section sets out guidance on the relationships between SMPs and other plans, specifically River Basin Management Plans (RBMPs), Flood Risk Management Plans (FRMPs) and Marine Plans (MPs), and the assessments to be carried out wherever a change in SMP management policy is proposed.

12.1 Background

River Basin Management Plans (RBMPs), Flood Risk Management Plans (FRMPs) and Marine Plans (MPs) all address aspects that are strongly related to the scope of SMPs. Coordination between these plans and the SMP is needed to ensure they are not contradictory, and ideally that they are complementary.

The link with SMPs is slightly different for each of the three other plans:

- RBMPs have come into existence in England after the 2006 SMP guidance was published and after many of the second generation SMPs were produced. Due to this, the interfaces at present are largely through SMPs informing RBMPs of shoreline management policies and actions (and in particular the implications of these on the environmental objectives in Article 4.1 of the Water Framework Directive (WFD, now “Water Environment Regulations”) through SMP-specific WFD Assessments).
- The first cycle of FRMPs was developed after the current SMPs. It referred to the SMPs for anything related to coastal flood risk and restated the SMPs’ measures. The second FRMP cycle is being prepared. It will again refer to the SMPs, both at a general level and in relation to specific measures.
- MPs guide those who use and regulate the marine area to encourage sustainable development while considering the environment, economy and society. The first MPs were also developed after the current SMPs, and although marine plans are not applied retrospectively, they must be considered when refreshing or amending SMPs which were introduced before the adoption of marine plans.

An overall retrospective review of the effect of the existing SMP policies on RBMPs, FRMPs or MPs is not required, as these other plans have had full cognisance of the SMP when they were being developed. Rather, the implications of, or potential effects upon, the objectives within these other plans need to be taken into consideration if the SMP Refresh process results in a change in any SMP policy or when existing SMP policies are taken forward to implementation through Coastal Strategies or schemes.

The Health Check processes raised no issues with existing relationships between the SMP and the FRMPs. For risks from coastal flooding, FRMPs presently fully refer to the SMPs and do not carry out any additional assessment themselves. There is therefore no identified need to produce particular guidance or information to support the FRMP, beyond any procedural instructions regarding their interface that may be provided by the Environment Agency.

Following sections consider the relationship between SMPs and RBMPs (**section 12.2**) and the relationship between SMPs and MPs (**section 12.3**).

12.2 River Basin Management Plans

12.2.1 Addressing findings from the Health Checks

The Health Checks raised very few issues with existing relationships between the SMP and the RBMPs. Notwithstanding that, there may still be a need to:

- Improve awareness of WFD issues and integration between SMPs and RBMPs.
- Assess the implications of any changes in SMP policy upon RBMPs through an updated WFD assessment.
- Align the updated SMP Action Plans with RBMP mitigation plans.

12.2.2 Improving awareness and integration

Improved awareness of the aims and objectives of the WFD and the role of RBMPs, specifically in respect of coastal and estuarine waters, can be gained by reviewing the following documents:

- The EU Water Framework Directive - integrated river basin management for Europe
https://ec.europa.eu/environment/water/water-framework/index_en.html
- About the Water Framework Directive
<http://evidence.environment-agency.gov.uk/FCERM/en/SC060065/About.aspx>
- Water Framework Directive assessment: estuarine and coastal waters
<https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters>

Improved integration between SMPs and RBMPs can be achieved by individual(s) locally involved in RBMP Cycle 3 and/or Catchment Partnerships becoming actively involved in the relevant Coastal Group or SMP Management Group. This may best be achieved through the Environment Agency Catchment Coordinator (Coordinator list is available here: <https://www.gov.uk/government/publications/map-of-water-management-catchments>) and will help ensure:

- Awareness and understanding of WFD issues is improved.
- Objectives of RBMP Cycle 3 are known and shared.
- Changes in SMP policies (arising from the SMP Refresh process or ongoing thereafter) are proven to be WFD compliant, minimising adverse impacts.
- Changes in SMP policies (arising from the SMP Refresh process or ongoing thereafter) are delivering WFD enhancement opportunities where possible (e.g. managed realignment of hard defences to reduce modification within coastal and transitional water bodies).

12.2.3 Assessing SMP policy changes

Where changes in SMP policy are identified (as part of the SMP Refresh process or ongoing thereafter) a bespoke WFD assessment will be required, as part of the overall SMP policy review process (see **section 4.3**), to ensure the policy change does not lead to a deterioration in Water Body status.

This assessment will be a relatively light touch process, effectively updating previous SMP-level WFD assessments in accordance with existing guidance: *Water Framework Directive: Guidance for Assessment of SMPs under WFD* (Royal Haskoning DHV, 2009) developed for the Environment Agency and based upon the latest defined Water Body status and the proposed changes in SMP policy.

The 2009 guidance describes the methodology for assessing the potential hydromorphological change and consequent ecological impact of SMP policies and ensuring that SMP policy setting takes account of the Directive. In the context presented here, it should be used for SMP policy changes.

12.2.4 Aligning SMP Action Plans with RBMP Mitigation Plans

As the SMP Action Plans are being updated as part of the SMP Refresh Project, the mitigation plans associated with each RBMP should be incorporated in so far as they are relevant to SMP policy delivery. The RBMPs from the 2015 cycle are available from: <https://www.gov.uk/government/collections/river-basin-management-plans-2015>.

12.3 Marine Plans

12.3.1 Addressing findings from the Health Checks

The Health Checks raised very few issues with existing relationships between the SMP and the MPs, but key recommendations are to:

- Improve awareness of the aims and objectives of Marine Planning, and the role of MPs.
- Ensure that any changes to the SMP have regard to MP in accordance with section 58 of the Marine and Coastal Access Act 2009.
- MPs are not applied retrospectively, (in place since 2011) was the statutory marine planning document in the absence of a plan. In most cases SMPs were developed before MPs and MPs have considered the policies and objectives section 58(3) of the Marine and Coastal Access Act 2009.

12.3.2 Improving awareness

The final four MPs were adopted in 2021, completing the suite of marine plans for English waters. Awareness amongst those delivering SMP policies or those involved in any refresh or change to SMPs must be increased. Under *Section 58(3)* of the Marine and Coastal Access Act 2009, public authorities must have regard to marine plan policy when taking any decision which relates to the exercise of any function capable of affecting the whole or any part of the UK marine area. This includes the development, refresh or replacement of any SMP. The following documents provide a useful introduction to the topic:

- East Marine Plan documents
<https://www.gov.uk/government/publications/east-inshore-and-east-offshore-marine-plans>
- North East Marine Plan documents
<https://www.gov.uk/government/collections/north-east-marine-plan>

- North West Marine Plan documents
<https://www.gov.uk/government/collections/north-west-marine-plan>
- South Marine Plan documents
<https://www.gov.uk/government/publications/the-south-marine-plans-documents>
- South East Marine Plan documents
<https://www.gov.uk/government/collections/south-east-marine-plan>
- South West Marine Plan documents
<https://www.gov.uk/government/collections/south-west-marine-plan>
- UK Marine Policy Statement
<https://www.gov.uk/government/publications/uk-marine-policy-statement>
- Using Marine Plans
<https://www.gov.uk/government/publications/using-marine-plans>
- Marine Plan Implementation Training
[Marine Plan Implementation Training - YouTube](#)
- Marine planning: a guide for local councils
<https://www.gov.uk/government/publications/marine-planning-a-guide-for-local-councils>
- Explore Marine Plans
[Explore marine plans - GOV.UK \(www.gov.uk\)](#)

Engagement with the MMO is recommended with regard to marine plan implementation training and in the development of refreshed/revised marine plans.

PART THREE – MAINTENANCE

Part three contains the following:

Section 13	SMP Status Tracker	88
Section 14	Action Plans	91

13 SMP Status Tracker

13.1 Introduction

This section sets out a simple low-maintenance template to use for recording and communicating the current status of the SMP. This should be used to record the sub-categories applied to each policy unit to improve policy clarity (**section 5**) and any changes made to the SMP.

13.2 Requirement

Despite the existence of Action Plans and an SMP reporting process, there is presently no readily accessible record of the latest SMP status. This makes it difficult to establish whether information contained within the published SMP document is current or whether any policy details have changed. This will become especially important when addressing findings from the Health Checks and will continue to be important as the SMP is maintained and actions are progressed in the coming years.

There is also nothing available that provides planners, members of the public, other stakeholders and interested parties with a straightforward summary of the current SMP either at the policy unit level or for the whole SMP.

The SMP Status Tracker is designed to address these requirements and is intended to supplement rather than replicate the SMP. It provides a 'live' summary of key information, in a single point of reference, that can be shared and accessed by a wide range of stakeholders as well as those maintaining the SMP. It can also be used to identify any strategic-level activities that are underway which might have a bearing on SMP policy in the future.

This information will be integrated for each SMP into the new digital platform.

13.3 Structure

The SMP Status Tracker has two main components;

- policy details, conveying the sub-categories and statements of management intent; and
- status information, summarising details of any changes or policy reviews.

The template, including illustrative samples of the information to be included, is shown in Figure 13.1.

13.3.1 Policy details

The SMP policy details should be provided as described in **section 5**. The sub-categories should be applied to each policy unit, split out into present, intermediate and target policy, alongside the overall intent of management which underlies those policy choices.

Presenting policy in this way conveys the policy sequencing and demonstrates the coherence or continuity between policies over time. For example, Hold the Line (Repair not Replace) implies the need for change at the end of the defence life and this should be followed by a policy indicating what that change might then be, for example

Managed Realignment (Remove Defences) or No Active Intervention (Cease to Maintain). This can be also be linked to setting of management triggers (see **section 6**).

13.3.2 Maintaining the status

Changes to the SMP

The Health Checks have established that although there are a number of locations where policy has changed since the SMPs were produced, this is not usually reflected in the accessible versions of the SMP documents. To ensure that there is greater and common awareness of those changes and where sections of the SMP are now superseded, those updates can be summarised in the tracker sheet.

The intent is not to provide extensive details in the Status Tracker, but to record any changes to policy or the SMP documents, and to signpost where the more detailed information and the full revised policy statement can be found.

The Status Tracker can also be used to maintain a change history.

Current policy-related activity

In addition to changes that have been made to the SMP since its adoption, any ongoing activities related to policy review or consideration should also be captured.

The Status Tracker is not intended to replicate the Action Plan, which includes a much wider range of strategic and routine actions and associated details, including lead organisation. Instead, the Status Tracker should simply record any activities that may affect policy in the near term, but not provide extensive detail.

Figure 13.1 SMP Status Tracker

Policy Unit		SMP Management Policy				Status				
ID	Name	Stage	Policy	Sub-category	Management intent	Changes and Updates to SMP		Current Policy-related Activity		
						Details	Date	Ongoing	Details	Date Added
1.1	A to B	Present	Hold The Line	Repair not Replace	SSSI would be damaged by continued defence of cliffs, small number of affected properties.			Yes	Review of Next Steps identified in HC	Sept 2020
		Intermediate	No Active Intervention	Cease to Maintain						
		Target	No Active Intervention	Do Not Defend						
1.2	B to C	Present	Hold The Line	Maintain / Replace	Protection of Town important to regional economy. No process links to other frontages	Long-term SMP Policy Changed from MR to HTL (hyperlink)	2016	No		
		Intermediate	-	-						
		Target	Hold The Line	Maintain / Replace						
1.3	C to D	Present	No Active Intervention	Local Activity Only	No funding but limited works to existing structures is permitted if funding is obtained.	Policy boundary (PU1.2/ PU1.3) amended (hyperlink)	2018	No		
		Intermediate	-	-						
		Target	No Active Intervention	Local Activity Only						
1.4	D to E	Present	Hold The Line	Repair not Replace	Remove existing defences and allow shoreline to retreat to new position to provide compensatory intertidal habitat for flood defences elsewhere.			Yes	Study ongoing	Sept 2020
		Intermediate	Managed Realignment	Set Back Defence						
		Target	Hold The Line	New Defences						
1.5	E to F	Present	Managed Realignment	Slow Erosion	Erosion of cliffs essential to allow natural processes to remain active and provide sediment to beaches downdrift			Yes	Policy Review	Sept 2020
		Intermediate	Managed Realignment	Remove Defences						
		Target	No Active Intervention	Do Not Defend						
2.1	F to G	Present	No Active Intervention	No need to Defend	No assets to protect, no requirement for interventions			No		
		Intermediate	-	-						
		Target	No Active Intervention	No need to Defend						
2.2	G to H	Present	No Active Intervention	No need to Defend	No assets to protect, no requirement for interventions			No		
		Intermediate	-	-						
		Target	No Active Intervention	No need to Defend						
2.3	H to I	Present	Managed Realignment	Remove Defences	Allow the shoreline to attain a more natural position and then retain defence to village along a new more sustainable alignment	SMP Policy Statement superseded (hyperlink)	July 2020	No		
		Intermediate	Managed Realignment	Slow Erosion						
		Target	Hold The Line	New Defences						
2.4	I to J	Present	Managed Realignment	Natural Features	Management only of the shingle ridge to support flood risk management - structural interventions are detrimental and not acceptable			Yes	Review of Next Steps identified in HC	Sept 2020
		Intermediate	-	-						
		Target	Managed Realignment	Natural Features						

14 Action Plans

14.1 Introduction

This section builds on the 2006 SMP guidance (volume 2, task 5.2). The basic principles behind an SMP Action Plan remain the same as outlined in that guidance, but the following sections clarify and update some key principles.

14.2 Format

A separate spreadsheet provides the template for the new Action Plan format.

The updated Action Plan format enables consistency at the highest level across all SMPs, but also allows flexibility so that each SMP Management Group can include additional detail if required. To achieve this, the updated Action Plan format uses a 2-tab hierarchy system:

- **Summary Action Plan** (see also Figure 14.1): this is a simplified view of the actions which only shows a limited number of columns that hold information considered vital for SMP policy progression, communication to stakeholders and upward reporting to the Environment Agency. This tab automatically pulls through the information entered into the matching columns of the 'Detailed Action Plan' tab (see below). The Summary Action Plan tab only shows strategic actions affecting SMP policy.
- **Detailed Action Plan** (see also Figure 14.2): this tab contains more detail on the actions. It can be used by the SMP Management Groups to capture as much information as they require to facilitate implementation of the actions. The template includes categories that have been requested by different groups, but several fields are optional. Additional columns can also be inserted by the SMP Management Group to capture further detail if they wish.

Detailed instructions on how to populate and use the Action Plan are provided in the template.

14.3 General principles

14.3.1 Types of action to be included

The SMP Action Plan should mainly focus on strategic actions that are needed to progress the SMP. These should specifically focus on delivering policies and should enable progress towards the long-term goal outlined in the SMP.

In general, it is recommended that non-strategic actions, such as day-to-day operational and routine management actions, are recorded separately outside the SMP Action Plan (see Box). Full definitions of strategic and non-strategic in the context of the SMP Action Plan are provided with the template.

Box 14.1 Non-strategic actions

There is a risk that if non-strategic actions are included in the Action Plan, the plans would become too cumbersome and the high-level strategic actions vital to SMP progression could be lost amongst too much detail.

However, it is recognised that some authorities may wish to incorporate non-strategic actions into the same plan. For this reason, the template includes a 'strategic or non-strategic?' column. All routine/operational actions should therefore be categorised as 'non-strategic', to allow them to be easily filtered out when needing to view only the strategic actions.

14.3.2 Timescales

The 2006 SMP guidance states that an Action Plan should include "*actions likely to be required between now and the next review of the SMP*", but also points out that "*clearly there is a need to consider works beyond the next 5 to 10 years as earlier actions may be required to enable these to proceed.*" Although the review cycle for SMPs has not been applied, and the Refresh process is now in place, certain principles still apply, namely that:

- The plan should remain focussed upon activities required most immediately, to concentrate minds and efforts on what is required now and in the next few years. In the context of the Refresh, that would indicate the next 5 years (see **section 3.5**).
- It is important nonetheless to look beyond that immediate timeframe to ensure that the subsequent actions are being planned for. In the context of the Refresh and seeking to be 'epoch 2 ready', that would approximately up to 10 years (see **section 3.5**).

There is still a need to keep the longer-term direction of travel in mind when considering the actions needed to support delivery of SMP policy, through regular and continual reference to the SMP documents, but there is a practical limit to setting meaningful actions. This limit is recommended to be 20 years. This corresponds with the timescale for other aspects of the SMP Refresh, such as planning and funding considerations. The timescale of the Action Plan should however continually roll forward, such that the horizon for setting actions advances a year every year.

If any actions are included that start beyond the 20 years horizon then it is recommended that they are appropriately categorised using the 'urgency' column, to enable easy filtering of the more immediate priorities.

14.4 Maintaining the Action Plan

14.4.1 Addressing the Health Check findings

An initial update of existing Action Plans will be required to account for the next steps identified by the Health Checks. This should use the new templates provided.

Where an existing Action Plan is actively maintained, other current actions will need to be migrated across.

Where the existing Action Plan has fallen into disuse, this offers an opportunity to resurrect action planning going forward.

14.4.2 Updates

The Action Plan should be continually updated (at least once a year) to ensure proactive shoreline management planning. As the Action Plan is 'rolled forward', new actions should be added as they are identified (see Box). In this way the Action Plan remains a 'live' document.

Box 14.2 Actions arising from other sources

A key activity will be to signpost any new actions identified by studies, strategies or plans as they are completed.

However, simply copying those additional actions into the SMP Action Plan without due consideration is not recommended. It is possible that many of those might be specific to the study requirements, or at a level of detail which is not strategic.

Once actions are completed, they should be marked as 'Complete' in the 'Action Progress Status' but retained within the Action Plan as a record of what has been done. This will mean the Action Plan continually grows as new actions are added, but the 'Action Progress Status' can be filtered to only show uncompleted actions. The outcome and any resultant changes to the SMP (if necessary) should be then recorded in the relevant columns of the Action Plan, and any follow-on actions should be added as new actions using the 'parent-child' approach to action numbering.

It is important to capture when and by whom the Action Plan is updated each time to keep a record and ensure the correct version is being used/shared. This should always be recorded in the first tab of the Action Plan whenever a major update is made.

14.4.3 Responsibilities

To ensure ownership of the Action Plan, the ultimate responsibility for these updates and for general management of the Action Plan should lie with one person, ideally the 'SMP Lead' for each SMP.

All organisations involved in delivering the SMP actions (as outlined by the revised guidance on Governance) should however be engaged in each review and the Action Plan updates where possible. Regular meetings (at least annually) are recommended, involving all parties to allow open discussion and agreement.

To ensure ownership of actions, the 'Delivery Organisations' group of columns should be completed and regularly updated.

Summary Action Plan							
Location in terms of SMP			Reference numbers	Action description & categorisation			Delivery
SMP Number	Policy Unit ID	Policy Unit Name (Location)	Overall unique reference no. (parent + child)	Action Description	Strategic or non-strategic?	Action theme	Action Lead Organisation
<i>Drop down</i>	<i>Drop down</i>	<i>Free form</i>	<i>Auto-fills by combining parent and child number</i>	<i>Free form</i>	<i>A locked filter could be placed on this column so only strategic actions appear in this tab.</i>	<i>Drop down</i>	<i>Free form</i>

Timings and progress tracking					Prioritisation & delivery risks			Costs	After completion	
Trigger for initiation	Start date	Completion date	Action Progress Status	Action Status Commentary	Priority score	Potential dependencies	Enabling actions	Estimated cost of action	Outcomes	Changes to SMP required?
<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Drop down</i>	<i>Free form</i>	<i>Autofills with output of risk matrix</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>

Figure 14.1 Summary Action Plan (draft for SMP Refresh project)

Detailed Action Plan												
Location in terms of SMP				Reference numbers				Action description & objectives		Action categorisation		
<i>Required</i>	<i>Required</i>	<i>Required</i>	<i>Required</i>	<i>Required</i>	<i>Optional</i>	<i>Optional</i>	<i>Optional</i>	<i>Required</i>	<i>Optional</i>	<i>Required</i>	<i>Required</i>	<i>Optional</i>
SMP number	SMP name	Policy unit ID	Policy unit name (Location)	Original SMP action reference	Main unique reference (parent no.)	Sub-action reference (child no.)	Overall unique reference no. (parent + child)	Action description	Primary action objective	Strategic or non-strategic?	Action theme	Policy unit check from SMP Health Check
<i>Drop down</i>	<i>Drop down</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Auto-fills by combining parent and child number</i>	<i>Free form</i>	<i>Free form</i>	<i>Drop down</i>	<i>Drop down</i>	<i>Drop down</i>

Location in terms of jurisdictions			Delivery organisations			Timings and progress tracking				
<i>Optional</i>	<i>Optional</i>	<i>Optional</i>	<i>Required</i>	<i>Optional</i>	<i>Optional</i>	<i>Required if start date not</i>	<i>Required if trigger not</i>	<i>Required</i>	<i>Required</i>	<i>Required</i>
Local Authority	EA Area	RFCC	Action lead organisation	Action lead contact	Key partner organisations	Trigger for initiation	Start date	Completion date	Action progress Status	Action status commentary
<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Drop down</i>	<i>Free form</i>

Prioritisation & delivery risks					Costs, funding & resources				Outcomes		Action References
<i>Required</i>	<i>Required</i>	<i>Required</i>	<i>Required</i>	<i>Optional</i>	<i>Required</i>	<i>Optional</i>	<i>Optional</i>	<i>Optional</i>	<i>Required when action complete</i>		<i>Optional</i>
Urgency rating	Importance rating	Priority score	Potential dependencies	Enabling actions	Estimated cost of action	Estimated funding source	On a funded programme? Which one?	Estimated resource requirement	Outcomes	Changes to SMP required?	Related References
<i>Drop down</i>	<i>Drop down</i>	<i>Autofills with output of risk matrix</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>	<i>Free form</i>

Figure 14.2 Detailed Action Plan (draft for SMP Refresh project)

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List of abbreviations

The following contains the abbreviations used throughout this guide:

AONB	Area of Outstanding Natural Beauty
ATL	Advance the Line (SMP policy)
CCMA	Coastal Change Management Area
CEVA	Coastal Erosion Vulnerability Assessments
Defra	Department of Environmental, Food and Rural Affairs
EA	Environment Agency
FCERM	Flood and Coastal Erosion Risk Management
FCERM GiA	Flood and Coastal Erosion Risk Management Grant in Aid
FRMP	Flood Risk Management Plan
HC	Health Check
HCP	Habitat Compensation Programme
HRA	Habitat Regulations Assessment
HTL	Hold the Line (SMP policy)
IDB	Internal Drainage Board
IROPI	Imperative Reasons of Overriding Public Interest
LPA	Local Planning Authority
LNRS	Local Nature Recovery Strategies
MCZ	Marine Conservation Zone
MMO	Marine Management Organisation
MP	Marine Plan
MR	Managed Realignment
NAI	No Active Intervention (SMP policy)
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
OBC	Outline Business Case

PU	Policy unit
RBMP	River Basin Management Plan
RFCC	Regional Flood and Coastal Committee
FRMP	Flood Risk Management Plan
RMA	Risk Management Authority
SAC	Special Area of Conservation. cSAC refers to candidate SAC.
SEA	Strategic Environmental Assessment
SLR	Sea level rise
SMP	Shoreline Management Plan
SoP	Standard of Protection
SPA	Special Protection Area. pSPA refers to potential SPA.
SSSI	Site of Special Scientific Interest
UKCP09	UK Climate Projections 2009
UKCP18	UK Climate Projections 2018
WFD	Water Framework Directive
WHS	World Heritage Site

Glossary

The following provides a glossary of key terminology used throughout this guide:

Advisory	Providing advice or suggestions, as opposed to statutory .
Assessment	The process of defining the problem, setting objectives, examining options; and weighing up impacts, (positive and negative) risks and uncertainties, in order to make a decision.
Climate change	The large-scale, long-term shift in the planet's weather patterns and average temperatures.
Case law	Law that has been established by following decisions made by judges in earlier cases.
Coastal change	Physical change to the shoreline through coastal erosion, coastal landslip, permanent inundation or coastal accretion.
Coastal Change Management Area (CCMA)	An area identified in Local Plans as likely to be affected by coastal change (physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion).
Coastal Group	Partnerships composed of the key partners in coastal management in a given place. There are seven strategic coastal groups in England.
Department for Environment, Food and Rural Affairs (Defra)	Government department responsible for safeguarding our natural environment and setting environmental policy.
Environment	This term covers landscape and natural beauty, wildlife, habitats, and buildings, sites and objects of archaeological, architectural or historical interest.
Epoch	This refers to a period of time. In the SMPs three epochs are defined – 0 to 20, 20 to 50 and 50 to 100 years from the present.
Flood and coastal erosion risk management (FCERM)	Managing the risks of flooding and coastal erosion to people, property and the natural environment through minimising, predicting and managing the risk.
Governance	Management and decision making processes.
H++ scenario	An extreme climate change that is typically beyond the likely range but still considered plausible.

Health Check	Document produced as part of phase 1 of the SMP Refresh for each SMP.
Partnership Funding	Defra's current policy which provides a system of funding that offers communities the opportunity to invest in (and benefit from) local FCERM measures, that could not be afforded from central government funding alone.
Policy transition	Moving from one policy to another over time.
Policy unit	A length of shoreline with similar characteristics in terms of coastal processes and assets at risk that can be managed efficiently.
Strategic Environmental Assessment (SEA)	A process of assessing the environmental opportunities and restrictions of a project, and identifying and managing its implications. An SEA is a legal requirement of certain plans and programmes.
Resilience	The capacity to adapt or respond to change.
Shoreline Management Plan (SMP)	A plan that sets out coastal defence management policies to support sustainable long-term management of risks from flooding and coastal erosion.
Standard of Protection (SoP)	In flood risk management, the annual probability of the design flood level being reached or exceeded
Statutory	Relates to a legal obligation.