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25th September 2009

Coastal Erosion Team
Department for Environment, Food and Rural Affairs
Area 2D, Ergon House,
Horsferry Road,
London. SW1P 2AL

Email response sent to: coastal.change@defra.gsi.gov.uk

Dear Sir/Madam,

RESPONSE TO: Consultation on Coastal Change Policy

Thank you for the opportunity to respond to the above. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

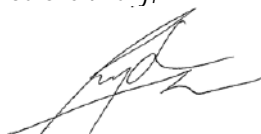
This document responds to the Consultation on Coastal Change Policy issued by DEFRA.

The response has been formed drawing on the expertise of members including the RTPI Environmental Planning and Protection Network and the RTPI Marine Spatial Planning Task Group.

With regard to the title of the consultation document, our members thought it implied more than it delivered, particularly since the essence of policy change will occur through the Marine and Coastal Access Bill and the new Planning Policy Statement on development and coastal change. To ensure successful interpretation and implementation of this document, it needs to be better integrated with existing and planned policy relating to coastal issues. Generally speaking, this document needs to link better with Planning Policy Statements, Local Development Frameworks, Sustainable Community Strategies and other council strategies such as Economic Development or Regeneration Strategies. We would strongly advise that any guidance provided should be within the context of existing mechanisms rather than the creation of additional paperwork.

Please find below a summary of our responses to this consultation document. If you require any further assistance, please contact Nicola Gough, Environmental Planning and Protection Network Manager, on 020 7929 9494 or email network.manager@rtpi.org.uk.

Yours faithfully,



Rynd Smith

Director Policy and Partnerships

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Coastal erosion assistance package

- *Do you agree that it is appropriate for Government to make available public funds to local authorities to cover demolition costs for which private homeowners are currently liable?*
- *Is the homeowner assistance package set at the right level to strike the balance between individuals taking responsibility for their investment decisions and ensuring that local authorities are able to provide practical assistance to homeowners who lose their home as a result of erosion? If not how could this be done?*
- *How should the payment mechanism for the demolition and moving assistance grant work? What evidence could be provided to Defra to support a claim for demolition and moving costs?*
- *Apart from the current plans to provide more information on coastal erosion risk through maps etc, what other ways could home buyers be informed about purchasing on areas of the coast at risk from coastal erosion and to factor this in to their purchase?*

In principle we agree with making public funds available; however, we have some concerns about the costs and requirements involved. We suggest that there needs to be a formal framework in place that clearly outlines these.

RTPI members expressed strong concerns that the level of homeowner assistance proposed might not be adequate or fair in circumstances where a home is to be lost consequent on a policy change in favour of managed retreat in a location that historically has benefited from coastal defences maintained at public cost. These circumstances are different from those that apply to homeowners in areas of pre-existing/known coastal erosion risk. That being said, it should be observed that a policy decision to support a new managed retreat does not of itself immediately or even in the medium term place a dwelling beyond beneficial use. The English planning system has not historically compensated landowners other than in direct circumstances of land loss or take, such as compulsory purchase. An additional study of the respective costs and benefits of supporting those who face the prospect of losing their homes to new areas of managed retreat over and above the homeowner assistance package would be required. Indeed, there may be a need for a longer term fundamental review of public compensation to individuals who may be adversely affected by the various potential impacts of climate change.

With reference to “individuals taking responsibility for their investment decisions;” We agree with this in principle; however, we suggest that there is a need for informed decision making, whereby information on predicted coastal change that would impact negatively on investments such as house values is picked up in property searches. This would require a change to existing legislation.

Another related matter that is more germane to planning is the question of the future use to which eroded or inundated land will be put, whether or not this is a product of managed retreat. There may be circumstances in which it is beneficial to draw a mosaic of derelict or no longer occupied residential or other vacant lots into a consolidated or public ownership to promote its positive management for nature conservation, for access or as recreational foreshore. New approaches to compulsory purchase to extinguish historic land ownerships, prevent dereliction and promote positive management may be necessary.

In addition, the RTPI suggests that explicit linkages should be made between this document and the new PPS on development and coastal change.

Community adaptation planning and engagement

- *Is the draft guidance useful, have you any suggestions as to how it could be improved?*
- *What other conditions/policies/support do you need in place to facilitate community adaptation planning and engagement?*
- *Are there sufficient communication tools to support technical discussions, how could this be improved?*
- *How should the plethora of decisions that involve community adaptation planning, be made?*

- *Should there be local governance structures in place to support adaptation planning, or should this simply evolve without structure?*

In principle, we see the guidance as potentially very useful. It is important however, that any community engagement should be integrated into existing mechanisms employed by Local Authorities, such as Sustainable Community Strategies, Local Development Frameworks, and Local Strategic Partnerships. This is essential for the integration of planning at all levels.

We also suggest that there is a need to take into account the scale of Local Authority areas when considering appropriate community engagement. For example, an authority where most activity is focused on the coast (e.g. Blackpool) would require a different approach to an authority where the coast is only a minor consideration.

Local buildings and properties

- *Are there other approaches to avoiding neglect of local buildings and properties to retain community vitality that pathfinders could explore?*
- *How best could pathfinders ensure that approaches to supporting local buildings and properties are designed to support the most vulnerable in adapting to coastal change?*

The definition of areas of "retreat" from protection from inundation should be identified to take account of the need to retain community identity and significant local buildings should be identified for protection accordingly. Measures that could support local landowners and the local community such as compensation, should it prove to be appropriate, should also be considered. Again, there may be a need for a longer term fundamental review of public compensation to individuals who may be adversely affected by the various potential impacts of climate change.

Business

- *Are you aware of any examples of existing sources of support and information enabling businesses to adapt to the risk of coastal change?*
- *What do you think the role of Business Link is in providing advice and guidance on managing coastal change risks to business?*
- *How might advice and support be improved?*
- *What do you think are the best ways of ensuring that local businesses are fully involved in community engagement?*
- *What incentives/support would enable local businesses to make use of sites which are unsuitable for permanent development or use but where there are economic opportunities in the short to medium term?*

With regard to the first bullet point, our members have identified *Marine South West* as an example of a support service, which was formed to increase the business competitiveness of marine sector companies in South West England. The company is supported by a group of public sector bodies which includes the South West Regional Development Agency, the Government Office for the South West (GOSW), South West Tourism, SEMTA and trade associations such as the British Marine Federation and the Engineering Employer's Federation. The project is directed by a Task Force which is made up of representatives of the partner bodies and prominent people from the business community.

As planning for coastal change is a specific area of expertise, we strongly believe that training will be required for Business Link employees to ensure that expertise in the profession supports new policy.

As highlighted in previous sections, the RTPI believe that community engagement should be linked into an overall approach of community engagement of a local authority (including Local Strategic Partnerships). In addition, there may be an enhanced role for emergency planning teams, in terms of providing proactive outreach programmes to areas

affected.

In terms of incentives, we suggest that financial incentives to establish temporary commercial uses may be appropriate, as long as they are supported by sufficient advice on the nature and timescale of use. The approach could include the waiving or reduction of business rates.

Local and Community Infrastructure

- *How can local authorities prioritise supporting the adaptation of existing assets – are you able to construct business cases for this work?*
- *What advice/topics would be helpful to be covered in the next update to the Department for Transport's Policies and Best Practice Handbook to help support you in transport planning?*
- *Do you have any examples of how best to do this, or ideas of new approaches that you want to share with colleagues?*

We note that this section is very focused on physical infrastructure. We believe that it should give greater attention to social factors, such as health and welfare. The successful integration of infrastructure and services is a key element of the spatial planning agenda and the RTP1 is wholly committed to influencing policy to achieve this end.

The natural environment

- *Do you have any examples of good practice which could be provide inspiration and guidance to others in dealing with the interface between the management of dynamic natural coastal environments and community well-being?*
- *How could we better involve the whole community in working with the natural processes of change on the coast so as to leave future generations with a more dynamic, resilient, thriving and beautiful natural environment?*

The following is an example provided by our members:

- Slapton Sands, Devon¹

The Partnership was formed in 2001 in response to a closure of the coast road (between the Slapton turn and Strete Gate), which lasted three months. The road was closed due to substantial damage caused by a combination of strong easterly winds, high spring tides and low levels of beach shingle.

The Partnership exists to:

- maintain the coast road for as long as reasonably possible
- support the community as it adapts to live and work with the changing coast, including the temporary and eventual permanent loss of the coast road
- to manage the future road closures to the benefit of the community

Why it is a good example? It provides:

- a positive and sustainable future for the Slapton area, balancing the needs of the coastal environment, community and economy;
- solutions and adaptations that are understood and supported by local residents, businesses and service providers;
- clear-sighted future planning and risk management, supported by effective co-ordination and communication;
- increased skills and capacity within the Partnership organisations for managing coastal change in the future;
- improvements to the condition status of Slapton Ley Site of Special Scientific Interest;
- the development of a model for community involvement in coastal adaptation which will be applicable to other areas.

¹ See the Slapton website for more information: www.slaptonline.org

The historic environment

- *As the threat to heritage assets is likely to outstrip resources for securing adaptation options or recording, investment in adaptation or recording will need to be carefully prioritised. How can we decide which heritage assets should be prioritised for investment?*
- *How can communities be involved in the decision making process?*
- *How do we ensure that we realise the public value of a heritage asset before it is damaged by coastal change?*
- *Do you have any new examples or ideas to be contained in the updated English Heritage guidance?*

There are historic assets on the coast that are designated, such as piers. Designation, however, does not mean that an asset is fully protected. The options are to protect something, to record and allow it to be lost, or to move it. Threat of loss is already recorded.

In terms of which heritage assets should be prioritised for investment our members felt that this should be incorporated into the plan-making process, for example through use of a supplementary planning document as part of local development frameworks.