

SMP Change Process – Update Thorpeness - Proposed Policy Change

Background:

Following the Suffolk Coast Forum meeting (15 May 2013) further clarification was requested on the two related items. These were the strengthening of the paper entitled 'Forum's role in Policy Change Management – Suffolk Shoreline management Plan 7 (dated May 2013) with regard to community consultation and in particular how would this be applied at Thorpeness SMP Change policy v2 (dated 15 May 2013).

The clarifications are outlined below:

Forum's role in Policy Change Management – Suffolk Shoreline Management Plan 7 updated September 2013.

The revised document (see appendix A for full document) now has an expanded community consultation section (extract below section 3 - text in blue) which highlights the importance of community and stakeholder consultation for major changes, prior to any change being submitted further through the approval process. It also identified that on a case by case basis moderate changes may also need consultation.

It does not specify how the consultation should be undertaken as this is a policy document and any consultation process needs to be appropriate to its location, nature of change and range of stakeholders. It does however identify examples of the types of audiences to be engaged and provides the safeguard that both the consultation process and results will be included in any documentation submitted for approval by the relevant Council cabinet.

For moderate changes (i.e. those changes that may impact on SMP delivery such as new studies or works proposals) consultations are specifically identified in the national framework guidelines. However for any such changes, advice will be sought from the SCF on a case by case basis, if additional consultation is required. Note: Not all moderate changes may require community consultation.

The expanded text is as follows:

3. Community Engagement (section revised September 2013) -

Any proposed major changes to SMP policy must include community and stakeholder consultation prior to being submitted for approval by local authority cabinet, submission to the RFCC and final approval by the Environment Agency. The type and extent of consultation will vary depending on the location and the nature of change however details of the consultation and its results will be included in any report for cabinet approval. The consultation will typically be targeted at the wider public, including individuals, community or interest groups and impacted Parish Councils. Changes identified as moderate changes may also require wider community consultation.

Thorpeness SMP Policy change - supporting text and communication plan.

The SCF meeting (15/5/13) accepted the principle of the proposed changes to the SMP policies at Thorpeness (Min 13.3 and Alb 14.1). However clarification was requested on (a) the supporting text for the SMP documentation and (b) the communication / consultation plan. These are as follows:

- a) SMP text – Detailed examination has been undertaken as to how practically the current SMP documentation could be amended to reflect the revised policies. It identified that the best solution was to add a new revision section to the SMP. This would highlight the new policies rather than a line by line amendment through the entire range of SMP documents.

This new section would be added to the main SMP document, included in the summary and also on the website. The proposed words for the main document are attached in appendix B.

- b) Community Consultation - Following a village planning event and under the remit of the Parish Council, Thorpeness has formed a Thorpeness Coastal Futures (TCF) sub group to lead on coastal issues. Thorpeness community; residents, property owners and interested parties are geographically fragmented and this new group is taking on the role of co-ordinating information and activity. Therefore community engagement on the change in the SMP policy is being developed with this new group.

The proposed engagement plan is as follows:

April 2013

Channel	What
Partnership working with Parish Council	Parish Council to endorse in principle the new policies

September/October 2013

Channel	What
Local newsletter	Awareness raising – details to be included in the first TCF newsletter
Thorpeness Coastal Futures group	Web-based consultation to over 150 direct email contacts

Future activity – date to be arranged

Channel	What
Partnership working between Suffolk Coastal District Council and Thorpeness Coastal Futures group	Joint village meeting

Beyond the brief plan for engagement above, future engagement will be planned in partnership with TCF and in response to feedback from the community consultation.

Engagement Plan Objectives

- To amend the SMP policy in the light of new information and local concerns in line with policy change guidelines.

- To work with the Thorpeness Coastal Futures group to ensure that local people feel that their concerns and views have been considered and reflected.

Key messages

- New studies have told us that there was more at risk on this piece of coastline than was originally thought and a positive management of the shoreline at Thorpeness is needed.
- In partnership with the local community we aim to maintain, in a sustainable manner, Thorpeness as viable coastal settlement and tourist destination recognising it's cultural and heritage significance.
- We will work closely with the Thorpeness Coastal Futures group to make sure that we take into account the views and concerns of the local community.

Recommendation:

That the Suffolk Coast Forum endorses:

- a) The revised wording on 'community engagement' in the Policy Change Document
- b) The text to be included in the SMP document for Thorpeness
- c) The approach to community engagement planned for Thorpeness



Meeting: 10 th September 2013 Agenda item: 3
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Forum's Role in Policy Change Management Suffolk Shoreline Management Plan 7 Updated September 2013

Background:

The Suffolk Shoreline Management Plan 2 (SMP) from Lowestoft Ness to Felixstowe Landguard Point was adopted in November 2011 by the lead authority Suffolk Coastal District Council (SCDC), Waveney District Council (WDC), Environment Agency (EA) and endorsed by the Anglian River and Flood Coast Committee (RFCC).

The SMP sets the intent of management for the coast based on three time periods (upto 2025, 2055 and 2105). The EA has issued generic guidance as to why and how to keep plans alive and up to date and continue deliver effective coastal management into the future and until a future formal review of SMPs.

This document translates the national generic updating framework to be specific for the Suffolk SMP. The Cabinets of SCDC and WDC has agreed that the Suffolk Coast Forum (SCF) will take over the responsibility of the Elected Members Forum (also called Representative members Forum) originally set up to approve the development of the SMP. The list of the original responsibilities and members is contained in appendix 1.

Proposed responsibilities of the Suffolk Coast Forum are:

The SCF is an integral part of an approval process for any changes to SMP policies. Overall the responsibility of the SCF is to ensure that any changes to the SMP are consistent with the change Framework, reflect the often complex and different pressures on the coast, are legal and also aware of any presidents that any change may create.

Specifically the SCF needs to:

- Agree the policy changes to be contained within SMP
- Seek ratification of SMP policies within their own organisation

This change process covers only the main elements of the SMP itself and the SMP Action Plan only where it would constitute a change to the overall plan and its management options. It does not cover normal updates to the Action Plan which do not change the SMP context or any of the detailed findings.

Reasons to update an SMP include:

- Significant new **research** or evidence on parameters that informed the decisions taken whilst developing the SMP;
- Significant changes in **Government policy** – such as on spatial planning and adaptation – since the SMP was approved;
- Significant new evidence arising from further investigation into local options, such as from a **Strategy Plan / scheme feasibility study**;
- A severe **event** has made an element of the existing SMP policy or action plan untenable.
- textual **corrections or clarification** of meaning required since SMP approval;

- **Organisational change** amongst those involved in SMP development that may affect SMP implementation:
- A need to update or amend programmes of work following **work progressed**.

This does not include the suggestion that the SMP, or something about the way it was developed, was wrong. It is designed to improve future outcomes.

Who is involved in the change process?

1. **Core Steering Group (CSG)** – made up of officers from the ‘decision making authorities’ who include:
 - 1.1. SCDC (SMP lead authority) and WDC who have coast protection responsibilities. SCDC is responsible for the administration of updates of this SMP
 - 1.2. The Environment Agency as responsible for managing sea flooding and with the Strategic Overview for managing all forms of flooding and erosion.
 - 1.3. Natural England, due to their statutory responsibilities on environmental matters.
 - 1.4. English Heritage, due to their statutory responsibilities for monuments and historical sites.
 - 1.5. Suffolk County Council in their capacity as Lead Local Flood Authority and responsible for supporting the SMP and its delivery. (SCC)

In addition others are invited to attend for their technical expertise or they are lead organisations for specific actions.

See Appendix 2 for list of current members

2. **Suffolk Coast Forum (SCF)** – made up of elected members from local authorities and senior officers from organisations represented on CSG.

In addition to the membership of the CSG the following are included:

- 2.1. Marine Management Organisation (MMO)
- 2.2. Chair of Eastern RFCC
- 2.3. Representative of local community based partnerships such as estuary partnerships including:
 - 2.3.1. Stour and Orwell Estuary Management Group (SOEMG)
 - 2.3.2. Deben Estuary Partnership (DEP)
 - 2.3.3. Alde and Ore estuary Partnership (AOEP)
 - 2.3.4. Blyth Estuary Group (BEG)
- 2.4. Suffolk Coast Against Retreat (SCAR)
- 2.5. Representative of Internal Drainage Board

3. The Community (section revised September 2013) -

Any proposed major changes to SMP policy must include community and stakeholder consultation prior to being submitted for approval by local authority cabinet, submission to the RFCC and final approval by the Environment Agency. The type and extent of consultation will vary depending on the location and the nature of change however details of the consultation and its results will be included in any report for cabinet approval. The consultation will typically be targeted at the wider public, including individuals, community or interest groups and impacted Parish Councils. Changes identified as moderate changes may also require wider community consultation.

4. **Approval bodies** – any substantive changes to the SMP or outcomes from the action plan will need to be approved by:
 - 4.1. Suffolk Coastal and Waveney District Council Cabinets
 - 4.2. Suffolk County Council Cabinet
 - 4.3. The Eastern Regional Flood and Coastal Committee (RFCC) are responsible for 'reviewing and endorsing' SMPs and agreeing the programme and funding for flood and coastal risk management works. Amended SMPs have to be submitted for approval to the Committee once the change has been made
 - 4.4. In order to ensure independent scrutiny and local consultation the Environment Agency then will approve changes to the SMP once the RFCC has given its approval

How can changes be initiated?

Instigators of change:

- CSG lead by SCDC will review management plan annually, to check that options in SMPs and other local and strategic plans remain compatible and sustainable.
- Regular review of the Action Plan should highlight any issues which may affect the ability to deliver the objectives and policies set out in the SMP.
- Any individual or organisation may propose or request a change, which can be put forward for consideration if supported by at least one of the decision making authorities on CSG, so long as one of the set out reasons for change exists, and there is a clear auditable trail.

Types of change:

A change can be categorised as one of the following:

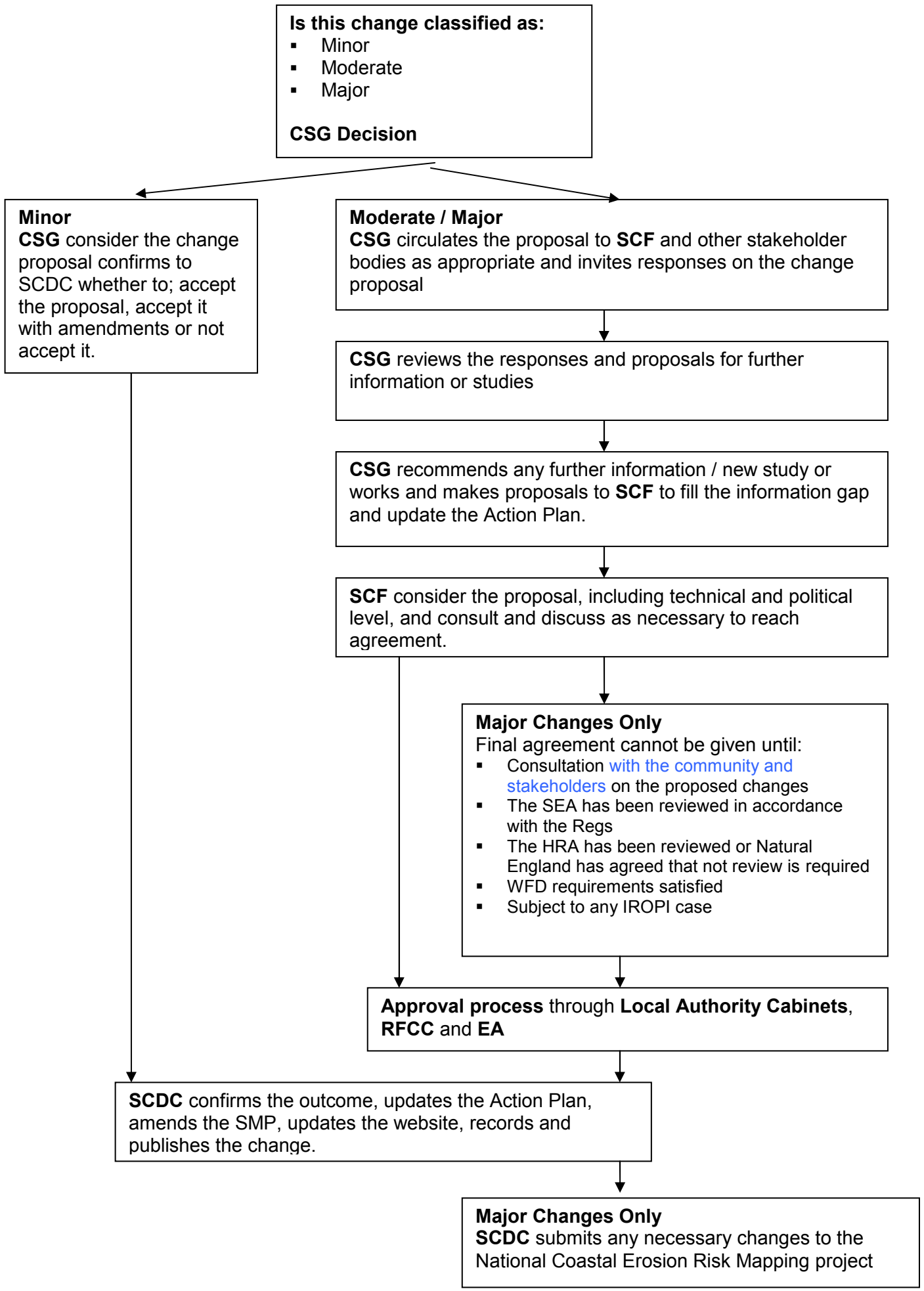
- Minor – textual corrections that do not alter the context or practical outcomes of the SMP; mapping corrections; change where no further study or information not already to hand will be required.
- Moderate – other changes to the Action Plan which may impact on the SMP delivery, e.g. scope of a study, scope of works; new study or new works proposal, or where proper consideration of the proposal will require further works or study; textual corrections where context is altered; changes impacting a nationally designated site, e.g. SSSI, NNR, AONB, Conservation Area.
- Major – significant changes to the Action Plan affecting delivery of SMP policy option; mapping corrections that affect the numbers of amount of property affected by flooding or erosion; proposals that will require significant works or study to enable proper consideration; impacts on funding leading to a different method of management, e.g. non intervention; changes requiring public consultation; changes of policy option and/or epoch; wider changes to Government policy; changes impacting on internationally designated sites, e.g. SAC, SPA, RAMSAR and Marine Conservation Zones once designated.

Reporting

There is a requirement from the Flood Risk Regulations of 2009 and the Flood and Water Management Act 2010, with the National Flood and Coastal Erosion Risk Management Strategy to monitor and report on flood and coastal risk management.

Around England reporting on the progress of implementing SMPs will be co-ordinated through the Coastal Groups to ensure a consistent approach. The detail is currently being finalised on this. Therefore the Suffolk process needs to be integrated with the national approach for consistency of reporting.

Once a change has been identified the following process should be followed:



1 Representative Members Forum – Original SMP Responsibilities

1.1 The involvement of Representative Members (RMF) in the process of proposal development reflects the "Cabinet" style approach to decision making operating in many local authorities. Politicians are involved from the beginning to minimise the risks of producing a draft document that does not meet the needs of the Operating Authorities. They are to be involved through a Forum, building trust and understanding between themselves, the CSG and Key Stakeholders.

1.2 Their responsibilities and tasks are:

- Agrees the overall scope of the SMP
- Agrees the issues to be dealt with by the SMP
- Agrees key stakeholder strategy
- Agrees key stakeholders representation
- Agrees the priority of the issues
- Agrees the objectives for the SMP
- Agrees the draft proposals from the Contractor
- Agrees the activities of the Client Steering Group
- Agrees the policies to be contained within draft SMP
- Seeks ratification of SMP policies

Appendix 2

Membership of the Core Steering Group

Organisation	Officer
ABP Ports	Richard Musgrove
EDF Energy	Emily Kennard / Martin Read
English Heritage	Helen Chappell
Environment Agency	Gary Watson
Harwich Harbour Authority	John Brien
Internal Drainage Board	Giles Bloomfield
Natural England	John Jackson
Suffolk Coast and Heaths Unit	t.b.c.
Suffolk Coastal / Waveney District Councils	Bill Parker (Chair) / Paul Patterson
Suffolk County Council	Annette Robinson / Jane Burch

Bill Parker
May 2013

Shoreline Management Plan 7

Lowestoft Ness to Landguard Point

Section 8: Plan Updates

Following completion of the SMP, the Action Plan database will continue to be managed by each authority. It should be noted that as time progresses, the plan may be updated to take into consideration new information that becomes available (see Section 7.2).

Updates are prepared in accordance with Environment Agency National Framework 'A Change process for Shoreline Management Plans in England' 2012.

The wording in any approved Plan update takes precedent over any discrepancy with the approved SMP7 document.

Successive issues of Section 8 describe individual revisions as follows:

Revision	Date	Policy Unit(s)	Location	Change summary
A	Sept 2013	PDZ4v9: MIN13.3 PDZ5v9: ALB 14.1	Thorpeness	Policy designation
B				

Issue 1
June 2013

REVISION A: Policy Units MIN 13.3 & ALB 14.1 - Thorpeness

Revisions including deleted text are shown in the following sections against document references in SMP7.

A1: Changes to PDZ4v9 section 4.4.4 and PDZ5v9 section 4.5.4

<u>1st epoch until 2025</u>	<u>2nd epoch 2025 - 2055</u>	<u>3rd epoch 2055 - 2105</u>
Previous policy: MIN13.3		
No Active Intervention	No Active Intervention	Managed Realignment
Revised Policy: MIN 13.3		
Managed Realignment with the current alignment maintained at existing defences, (see section A3)	Managed Realignment with review of maintaining the current alignment at existing defences, (see section A3)	Managed Realignment
Previous policy: ALB 14.1		
No Active Intervention	No Active Intervention	No Active Intervention
Revised policy: ABL 14.1		
Managed Realignment	Managed Realignment	Managed Realignment

A2: Revised policy for MIN 13.3 and ALB 14.1

- A 2.1 In the light of new evidence since 2010 the revised policy recognises that intervention may be necessary to provide positive management of the shoreline position in response to episodic events within the 100 year framework of the SMP. It does not make or imply a commitment to measures which may be unaffordable, unsustainable or have adverse impacts.
- A 2.2 The revised policy assumes the DEFRA definition of Managed Realignment: *allowing the shoreline to move backwards or forwards, with management to control or limit movement (such as reducing erosion or building new defences on the landward side of the original defences)*. This would not preclude the shoreline remaining in its current position if this is sustainable.
- A 2.3 The existing policy unit boundaries remain unchanged. There is no intention to actively manage the area north of the existing defences in front of North End Avenue which is still within the boundary of MIN 13.3. For the small area to the south of Haven House Managed

Realignment will align with the policy of the adjacent policy unity ALB 14.2 through all epochs and therefore remove any inconsistency or artificial boundary.

- A 2.4 The previous policy of No Active Intervention for MIN 13.3 and ALB14.1 did not preclude minor works resulting in ambiguity of interpretation.

A3: Revised policy for MIN 13.3

- A 3.1 The existing defences referred to in the revised policy for MIN 13.3 in section A1 are subject to the following conditions:

(i) An Agreement dated [8.10.2010] between SCDC and Community Contributors with reference, *inter alia*, to Appendix 1 section R&M2: *Due to the unpredictability of the environment, it is not possible to give an accurate forecast of future repair and maintenance requirements to the Works. The Project Appraisal Report (PAR) assumes that the evolution of the shoreline will follow a pattern of slow long term erosion with occasional increase in erosion pressure of the type experienced in 2010. The scheme assumes that the Works will be sufficiently resilient to act as a backstop defence, but they are not intended to resist constant significant erosion pressure.*

(ii) The FCRM Project Appraisal Report for the 2010 Thorpeness Erosion Response Works Version 02 dated 1st December 2010 adopted Option 7:

Section 1.3.5: Works with a longer design life, providing a more secure toe to the defence and providing the expectation that, when re-exposed by periods of severe erosion, the improvement in defence would be sufficient to maintain the defence over a period of some 50 years,

Section 1.4.5: As long term erosion occurs along the whole frontage, as distinct from the short term severe erosion, the approach now taken would allow for progressive failure in line with SMP policy.

- A 3.2 Maintaining the current alignment at existing defences in MIN 13.3 during epoch 1 is supported by retaining the system impact clause: PDZ4 Baseline Scenario 2: *Holding the line south of Thorpe Ness would have little impact on the system as it is to the south of the continuing main control point. There are no significant sustainability issues but this would have a potential impact on the reasons for designation of the area.*

A4: Changes to PDZ4v9 section 4.4.2 and PDZ5v9 section 4.5.2

- A 4.1 The stakeholder objectives for Thorpeness remain unchanged. The tables in PDZ4 and PDZ5 are revised as follows:

Stakeholder objective unchanged	No Active Intervention			Managed Realignment		
	Fail	Neutral	Acceptable	Fail	Neutral	Acceptable
To maintain in a sustainable manner Thorpeness as a viable coastal settlement and tourist destination recognising it's cultural and heritage significance						

A 4.2 The following revision of baseline scenario 1 reflects the episodic nature of change across the whole village frontage based on current evidence: *At Thorpe Ness there would be slow erosion and this has the potential to allow further erosion to the south in front of the village, typically in episodic events with a reducing return period. Initial losses might be anticipated on the coastal frontage during and beyond the next 50 years with the potential for flooding in the lower areas of the village.*

A5: Change to economic assessment

A 5.1 Revision to include the episodic nature of change along the Thorpeness village frontage does not align with the previous MDSF Assessment of Erosion Damages in the SMP. This was further revised in the PAR referred to in section A.3.1 (ii). The previous assessment is deleted:

A6: Change to Appendix C Annex 2

A 6.1 The following change reflects the upgrading of the gabion revetment at Thorpeness referenced in A.3.1 (ii)

SUF/B/10 Thorpeness Gabions Northern end of Thorpeness village. Chainage 40.61km to 39.81km. A gabion revetment reinforcing a vegetated slope with residential properties at its crest. Suffolk Coastal District Council - Residual life up to 50 years, see section A.3.1 (ii)