



Shoreline Management Plans: Supplementary guidance for their ongoing maintenance and delivery – Wales

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Crynodeb gweithredol

Mae pedwar Cynllun Rheoli Traethlin (CRhT) yn cwmpasu arfordir Cymru. Datblygwyd y CRhTau presennol (ail genhedlaeth) gan grwpiau o Awdurdodau Rheoli Risg gan gynnwys Cyngor Cefn Gwlad Cymru ac Asiantaeth yr Amgylchedd Cymru (Cyfoeth Naturiol Cymru wedi hynny o 2013), awdurdodau lleol Morol a rhanddeiliaid allweddol eraill, yn seiliedig ar ganllawiau a gyhoeddwyd gan Defra yn 2006 gyda chefnogaeth Llywodraeth Cynulliad Cymru (a ail enwyd yn Llywodraeth Cymru yn 2011). Mae pob CRhT yn amlinellu cynllun dewisol ar gyfer 'cynllunio rheoli amddiffynfeydd arfordirol' mewn modd cynaliadwy yn y tymor hir, sy'n cefnogi agweddau eraill ar gynllunio arfordirol trwy ddarparu gwybodaeth ynglŷn â newidiadau disgwylidig i'r arfordir a risg llifogydd ac erydiad arfordirol. Nid oeddent yn 'gosod polisi ar gyfer unrhyw beth heblaw rheoli amddiffynfeydd arfordirol' (Defra, 2006), neu'r hyn y cyfeirir ato'n fwy cyffredinol erbyn hyn fel Rheoli Perygl Llifogydd ac Erydiad Arfordirol.

Cafodd y CRhTau eu datblygu gan ystyried ffactorau technegol, amgylcheddol, cymdeithasol ac economaidd, er bod cydnabyddiaeth y byddai angen eu hadolygu'n achlysurol ac y byddai angen iddynt fod yn ddigon hyblyg i addasu i wybodaeth newydd a newidiadau i ddeddfwriaeth, gwleidyddiaeth ac agweddau cymdeithasol. Er mai dim ond yn 2014 y cafodd y CRhTau eu cymeradwyo, mae'r wybodaeth a'r sylfaen ar eu cyfer yn dyddio o 2008 ymlaen. Bellach, oddeutu degawd ers iddynt gael eu datblygu, daethpwyd i'r casgliad y byddai'n briodol i 'Adfywio'r' Cynlluniau Rheoli Traethlin. Mae hyn yn cynnwys gwirio bod y CRhTau yn parhau i fod yn gyffredol o ystyried unrhyw dystiolaeth newydd ac i baratoi ar gyfer newidiadau polisi sydd wedi'u cynllunio ar gyfer nifer o leoliadau o 2025 ymlaen.

Nid oes angen disodli'r canllawiau 2006 presennol ar y Cynlluniau Rheoli Traethlin, ond deallir y byddai canllawiau ychwanegol o fudd er mwyn cefnogi'r gweithgareddau Adfywio ac i hybu'r defnydd cyson o egwyddorion allweddol ar draws y Cynlluniau.

Mae'r ddogfen hon yn amlinellu'r egwyddorion ar gyfer symud y CRhTau yn eu blaen, ac yn disgrifio'r tasgau a'r gweithgareddau er mwyn gwneud hynny. Mae'n cynnwys cyfres o adrannau yn ôl pwnc yn amlinellu sut i ymgymryd â'r gweithgareddau hynny, ynghyd â chanllawiau newydd ar gyfer adrodd a chyfathrebu statws y CRhTau.

Executive summary

The coastline of Wales is covered by four Shoreline Management Plans (SMPs). The current (second generation) SMPs were developed by groups of Risk Management Authorities (RMAs), including the Countryside Council for Wales and Environment Agency Wales (both subsequently Natural Resources Wales from 2013), maritime local authorities and other key stakeholders, based on guidance published by Defra in 2006 supported by Welsh Assembly Government (renamed Welsh Government in 2011). Each SMP sets out a preferred plan for long-term sustainable 'coastal defence management planning', which supports other aspects of coastal planning by providing information on expected coastal changes and risks from flooding and coastal erosion. The SMPs did 'not set policy for anything other than coastal defence management' (Defra 2006), or what is more commonly now referred to as Flood and Coastal Erosion Risk Management.

The SMPs were developed taking technical, environmental, social, and economic factors into account, 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. Although the SMPs were only signed off in 2014, the information and basis for them dates from 2008 onwards. Now, a decade or so since their development, a 'Refresh' of the SMPs is appropriate. This includes ensuring that the SMPs remain up to date in light of any new evidence and preparing for policy transitions planned for many locations from 2025 onwards.

Replacing the existing 2006 guidance on SMPs is not required, but it is recognised that supplementary guidance would be beneficial to support Refresh activities and promote consistent application of key principles across SMPs.

This document sets out the principles for moving the SMPs forward and describes the tasks and activities required to do 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 SMPs.

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 organisation involved in SMP governance and maintenance, particularly, Coastal Groups and the Welsh Coastal Group Forum (WCGF).

This document aims to support these organisations in accommodating and dealing with changes that have arisen since the SMPs were produced, through recommendations and guidance rather than explicit instruction.

1.2 Background

Four second-generation SMPs were developed between 2008 and 2014 that cover the coastline of Wales (two of which also crossed into England). They were developed inclusively and thoroughly by Coastal Groups:

- Strategic partnership bodies of Flood and Coastal Erosion Risk Management (FCERM)
- Risk Management Authorities (RMAs), principally, Natural Resources Wales' (NRW) predecessors and maritime local authorities
- Government bodies and other stakeholders

SMPs are approved by local councils and finally signed off by Welsh Government for coastal flood and erosion risk management.

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

Although it has been less than 10 years since the SMPs received final approval, the development of their content dates from earlier, according to the 2006 Guidance and earlier key 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 on the natural environment.

Following a similar exercise carried out across the English SMPs between 2019 and 2020, NRW, together with Coastal Groups and other organisations, identified a clear appetite for work to be done on SMPs, but not a fundamental rewrite of the Plans, as would be implied by a third generation of SMPs. Consequently, instead of the 5 to 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 2006 Guidance on SMPs was not identified. It was, however, recognised that supplementary guidance would be beneficial, focussing on improving overall quality, deliverability and consistent application of key principles across the SMPs.

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

1.3 What is the SMP Refresh?

As the end of epoch 1 (defined in SMPs as 2025) approaches, it is important to examine how the SMPs will achieve the longer-term sustainability plan outlined within them. In many cases, this will involve some change in how shoreline management is delivered.

A core aim of the Refresh is to provide the Coastal Groups with clear guidance on how to plan for and seek to achieve that transition. This will include accepting the current situation and acknowledging that the transition must happen if the longer-term plan for more sustainable shoreline management set out in the SMPs is going to be delivered. The Refresh is also focussed on improving overall quality, deliverability and consistency, leaving room for local nuance and interpretation of particular issues. The Refresh sets out the way in which the shoreline management process can be progressed and reinvigorated, building on the original guidance provided for SMP development.

The following steps form the key elements to be addressed in the coming years to deliver on these objectives:

Phase 1 of the Refresh (undertaken by Jacobs and Royal HaskoningDHV on behalf of NRW and members of Coastal Groups) provides the following:

1. A review of how changes that have occurred since the development of the second-generation SMPs might be accounted for as SMP management policies are implemented. This provides supplementary guidance for SMPs going forward.
2. A Health Check on each SMP, establishing how any of those changes identified in item 1 may affect SMP management policies and determining whether there are any other potential deliverability issues.
3. A Framework for moving forward and direction to manage SMP development and implementation.

The next steps (Phase 2 of the SMP Refresh) will primarily be led by Coastal Groups at the SMP level and include the following:

4. Deciding what needs to be done for each SMP (informed by the Health Checks).
5. Establishing the specific actions necessary to move forward (in line with the Guidance and Framework described in items 1 and 3) and populating the Action Plans.

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

6. Proceeding with a review of any 'at risk' policy units (as identified by items 2 and 4); considering and making changes to SMP policies if required, in line with the procedures set out by the WCGF.
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 on the nature of requirements at the local scale, but it is expected that these would occur over a timeframe of no more than the next 10 years (that is, spanning the end of epoch 1 and the start of epoch 2). Item 8 should commence during this same period but will be ongoing beyond this timescale, with continual updates to knowledge and information, keeping the SMP and its policies under regular review.

1.4 Structure of this guide

This guidance document is structured as follows:

- **Part One – Approach** – Sets out the framework for progressing shoreline management and provides the user with an outline of the processes for continuing to deliver the SMP.
 - **Section 3 Refreshing the SMP** – Sets out the principles and framework to now take SMPs forward, retaining a robust foundation for delivering ongoing 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 – Topics** – Contains updated guidance on specific topics, including recommendations on what and how to consider and incorporate new information.
 - **Section 5 Policy clarity** – Provides recommendations for improving consistency and clarity of SMP policy and management intent.
 - **Section 6 Management triggers** – Introduces the concept of 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 recommendations to assess whether and how funding availability could influence SMP policy delivery.
 - **Section 9 Links with planning system** – Provides guidance on establishing appropriate links with land-use planning.
 - **Section 10 Responding to change** – Provides direction on adapting to change and engaging with others.
 - **Section 11 Protected sites** – Provides direction on how protected sites and wider environmental objectives should be considered.
 - **Section 12 Relationship to other plans** – Explains the linkage between SMPs and River Basin Management Plans, the Welsh National Marine Plan (WNMP) (Welsh Government 2019a) and Local Flood Risk Management Strategies.
- **Part Three** provides details on recording the status and actions on the SMP, including recommendations for improvements to the Action Plan format and guidance for its use.
 - **Section 13 Status Tracker** – Sets out a proposed template and guidance for recording and maintaining details of any changes made to the SMP.
 - **Section 14 Action Plans** – Sets out recommendations for improvements to the Action Plan format and guidance on its use.

Ahead of the Parts, **Section 2** sets out the relationships between sections in this guidance and the recently published National Strategy for FCERM (Welsh Government 2020a).

2 Relationship to National FCERM Strategy

2.1 Policy context and relevant documents

New national strategy and policy documents have been published since the existing SMPs were produced. The most directly relevant is the *National Strategy for Flood and Coastal Erosion Risk Management in Wales* (National Strategy) (Welsh Government 2020a). This also encompasses and references relevant parts of other important policy documents, such as the Flood and Water Management Act 2010, Welsh Government's Taking Wales Forward document, *Prosperity for All: the national strategy* (Welsh Government, 2017), the Planning (Wales) Act 2015, the Environment (Wales) Act 2016, and the Well-being of Future Generations (Wales) Act 2015.

The National Strategy identifies a need to review the Local Flood Risk Management Strategies (LFRMS) and links these with the SMPs (discussed further in **Section 2.2**).

The National Strategy's Strategic and Legislative Context section describes how FCERM supports Welsh Government's commitments from the Prosperity for All document, in particular for 'Prosperous and Secure', 'Healthy and Active' and 'United and Connected' (Figures 1 and 2 in the National Strategy [c 2020a]).

The National Strategy also describes the links between FCERM and the Well-being of Future Generations (Wales) Act. It explains that the National Strategy's focus on natural flood management will contribute to the following seven well-being goals:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

Figure 3 in the National Strategy gives examples of how FCERM contributes to the aims of the Well-being of Future Generations (Wales) Act.

NRW has defined nine principles for the sustainable management of natural resources (SMNR), as shown on **Figure 2-1**. These are based on the Environment (Wales) Act and the Well-being of Future Generations (Wales) Act, and are intended to guide NRW's way of working, including flood and coastal management.



Figure 2 1. Principles of SMNR

SMPs play an implicit role in how FCERM contributes to the aims of Prosperity for All and the *Well-being of Future Generations (Wales) Act* by supporting the National Strategy’s objectives. The links between SMPs and these documents are covered by the Signposting of National Strategy discussed in **Section 2.2**.

2.2 National Strategy for FCERM in Wales

The National Strategy has a defined aim and five objectives, which complement and overlap each other and are intended to reduce risk to life. The National Strategy’s aim is to ‘reduce the risk to people and communities from flooding and coastal erosion’.

The National Strategy’s five objectives are as follows:

- A. Improving our understanding and communication of risk
- B. Preparedness and building resilience
- C. Prioritising investment to the most at-risk communities
- D. Preventing more people becoming exposed to risk
- E. Providing an effective and sustained response to events

The National Strategy develops these objectives into two or three topics each, with their own more focussed sub-objectives. These sub-objectives are supported by a set of 24 measures in total. The National Strategy contains an introductory section that describes the organisation of flood and coastal erosion risk management, which contains a subsection on SMPs that describes the process and roles. That subsection also includes one of the sub-objectives under Objective A and associated Measures 10 and 11. These relate directly to the SMPs.

Table 2-1 links the National Strategy’s SMP subsection text to the relevant section in this guidance.

Table 2-2 identifies the most relevant elements of the five National Strategy objectives and associated measures, and links these to the relevant topics and sections in this guidance.

Table 2-1. Links between this guidance and the National Strategy

Relevant text (quoted)	National Strategy paragraph number	Link to SMP topic (section within this guidance document)
<i>[SMPs] are non-statutory documents but Welsh Government want to see them considered both in local decision making and strategic planning, such as Local Development Plans and Local Flood Risk Management Strategies.</i>	176	Section 9 discusses links between the SMP and planning. Section 12 discusses the relationship between SMPs and other strategic plans. For Wales this includes a section on Local Flood Risk Management Strategies.
<i>[...] the epochs are not absolute and timing decisions on implementation should be informed by factors like rate of sea level change and detailed local studies, taking into account social and well-being factors as well as environmental opportunities.</i>	182	Section 6 explains how SMPs can start to consider triggers for policy change, alongside the broader framework of the three epochs.
<i>The preferred management policies set out in SMPs should influence and inform the preparation of Strategic and Local Development Plans and their coastal policies.</i>	183	Section 9 discusses links between the SMP and planning.
<i>The SMPs are living documents and should be reviewed and amended where more up-to-date information, such as climate change projections, is available.</i>	184 and 185	Section 4.3 provides supplementary advice in support of the Wales Coastal Group Form's guidance to the major policy change process in Wales (2019). Section 7 explains how climate change should be accounted for in SMPs. Section 13 introduces an SMP Status Tracker that can help communicate the latest status of SMP policies.

Relevant text (quoted)	National Strategy paragraph number	Link to SMP topic (section within this guidance document)
<i>The Coastal Groups are responsible for producing and managing the SMPs.</i>	186 and 187	Section 4.2.2 emphasises that SMP management is the responsibility of the Coastal Groups and recommends reinforcing this role.
<i>Action Plans arising from the SMPs set out measures relevant to each stakeholder, and are for Coastal Groups to monitor and progress.</i>	Sub-objective A8	Section 14 provides updated guidance for the SMP Action Plans.
<i>Coastal Groups to report annual progress on SMP Action Plans to Welsh Government through the Wales Coastal Group Forum.</i>	Measure 10	Section 14 provides updated guidance for the SMP Action Plans.
<i>Coastal Groups to report on the implementation of SMP epoch 1 policies, through Wales Coastal Group Forum to Welsh Government, by 2025.</i>	Measure 11	Section 3.5 explains the change in focus of the SMP process toward 'getting epoch 2 ready'. Section 13 introduces an SMP Status Tracker that can help communicate the latest status of SMP policies.

Table 2-2. Alignment with the five objectives of the National Strategy

Objective	Relevant sub-objective or measure from National Strategy (summarised)	Link to SMP topic (section within this guidance document)
A. Improving our understanding and communication of risk	Measure 9: NRW to ensure the National Coastal Erosion Risk Map (NCERM) matches SMP policies by 2021 and shows erosion rates as bands in the Wales Flood Map products by end of 2022.	Web-based tool to support this process (not addressed in this guidance).
	Measures 10 and 11	Table 2-1.
B. Preparedness and building resilience	Measure 12: Improve awareness and access to information on FCERM.	Web-based tool to support this process (not addressed in this guidance).

<i>Objective</i>	Relevant sub-objective or measure from National Strategy (summarised)	Link to SMP topic (section within this guidance document)
C. Prioritising investment to the most at-risk communities	Paragraphs 219 to 220 describe how investment is prioritised. This is described in more detail in separate Section Funding FCERM.	Section 8 confirms the existing SMP approach that funding and scheme economics are not a direct policy driver. It does however provide guidance for validating that preferred policies are realistically fundable.
D. Preventing more people becoming exposed to risk	Measure 17 Update TAN15 by 2021 recognising information now available to Local Planning Authorities.	Section 9 gives guidance for the interface between SMPs and the planning system, with a focus on engagement.
	Measure 18 Develop further guidance on coastal adaptation.	Section 10 explains how the SMP can support the process of adaptation, structured by the Well-being Act's five ways of working and including the development of coastal adaptation plans.
E. Providing an effective and sustained response to events	No relevant sub-objective or measure.	Not directly relevant to SMPs.

PART ONE – APPROACH

Part One sets out the overall approach to be followed in maintaining the SMP.

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3 Refreshing the SMPs

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 on 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 ongoing management whilst still benefitting from the large amount of information and thought that went into developing the existing SMPs. It describes the basic thinking underpinning the Refresh and the shoreline management process envisaged thereafter.

3.2 The ‘Refresh’ process

3.2.1 Principles

The Refresh process builds on 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:

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 must 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 an 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 the last point, the distinction is made between ‘policy transition’ (modifying the way in which, or timescale over which, one policy moves to another, but in line with an SMP’s intent) and ‘changing policy’, which is the more fundamental process by which there is deviation away from the original intent of the plan.

SMPs continue to provide a road map for shoreline management. Whilst it is important to not lose sight of the long-term plan, the focus of the Refresh is how to deliver the management policies and decisions that were identified for epoch 2, recognising there may also be a need for catch-up with respect to some aspects of the epoch 1 management.

3.2.2 Basis of the SMP Refresh

The 2006 SMP guidance (Defra 2006) states that although the SMPs define policy solely for FCERM, this must 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 ongoing, continuous framework for shoreline management.

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

- Framing 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 SMPs, but in essence aimed at establishing how, in practice, the principles and intent set out in the SMPs are delivered.
- In maintaining an overall coherence across the whole area of the SMPs, 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 SMPs 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 SMPs' value or function. Whilst maintaining this underlying ability to adjust, the SMPs at any point in time provide definitive current thinking as to how shoreline management is taken forward.

SMPs continue to have an important role but need to remain useful so that they are used. As such, it is essential that the SMPs are maintained as living plans, as relevant sources of reference and as starting points or the 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 SMPs was to move from the present situation towards a more sustainable target for coastal flood and erosion risk management in the future, as illustrated on the first graphic of **Figure 3-1**. The present state of shoreline management planning can therefore be considered as having the following three basic components:

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

These can be broadly mapped onto the SMP framework, as set out on the second graphic of **Figure 3-1**. 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' often corresponds with the management policy set out for epoch 3. This framework is not definitive, and timing and transition can be different from place to place, but the general principle applies. It highlights the significance of epoch 2 as frequently being identified within SMPs as a key period for establishing how to move (transition) from one state to the other.

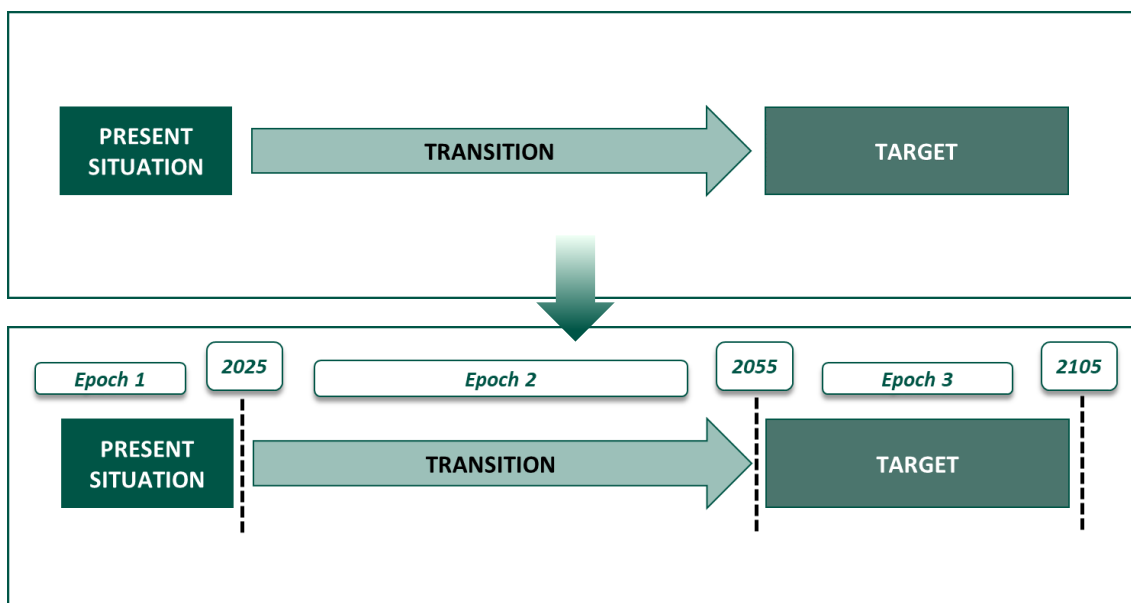


Figure 3-1. The current SMP framework for delivery of the plan (typically)

The pathway to achieving 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 as requiring a transition of some sort (**Figure 3-1**). But even where policy does not explicitly change, for example, where policy is Hold the Line, Hold the Line, Hold the Line, there may still be changes in conditions that would 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 and implementation approach may change. It is also important that present management neither restricts opportunity for change nor raises expectation that change cannot occur in the future.

3.4 Incorporating a new way of thinking

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

- The Refresh framework reinforces the idea that the epochs were set out as broad management periods for the benefit of consistent overview on shoreline management policy changes, helping to distinguish short-, medium- and long-term planning. The aim is to guide, rather than dictate how plan delivery is phased.
- There has always been the need to be responsive to external factors; such as climate change (and the uncertainties) and social attitudes, funding and wider (non-FCERM) requirements. 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 does not simply occur because ‘that is what it says in the SMP’, but because there is an effort 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 whilst anchoring anticipatory planning to the broader management intent.

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 some cases, this was expected to occur through epoch 1, but that has not always been the case. In others, the planning will occur early in epoch 2 in order for it to happen within the defined timeframes. Therefore, this work 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’; these steps 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. That process will not happen overnight, but it is expected that it would occur over a timeframe of no more than the next 10 years (that is, spanning the end of epoch 1 and the start of epoch 2). Refer to **Figure 3-2** for the Refresh process.

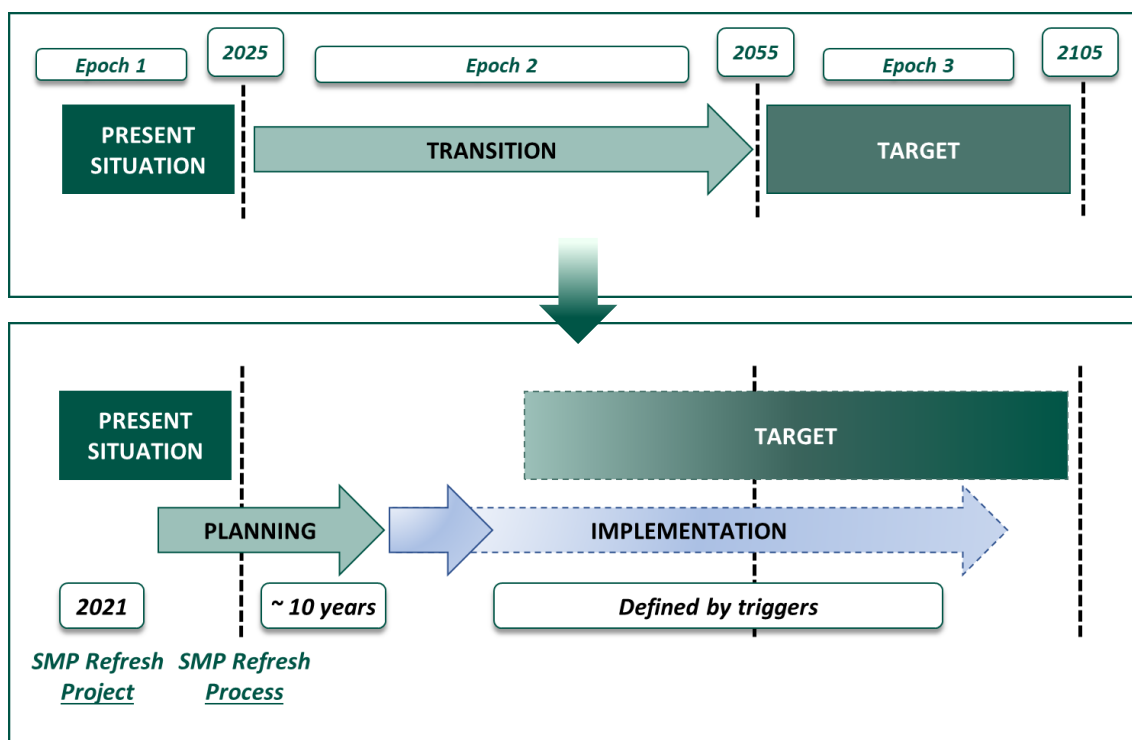


Figure 3-2. Evolving the current SMP delivery framework and how the SMP Refresh project and process fit into that framework

3.5.2 Use of management triggers

Epochs provide a useful, broad-scale understanding of timescales. However, they remain open to misunderstanding as to when transitioning (or changes) may be required and tend to anchor the whole process to those epoch timescales. 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.

Management triggers could therefore be useful as part of longer-term planning 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 part of the framework for moving forward.

Trigger types define what factors drive the proposed change towards the long-term intent of the plan, and trigger points identify the point in time when that transition needs to be made.

In the context of SMPs, the following definitions apply:

- Trigger type: A parameter or combination of parameters that can reach a point where existing policies and responses (such as management approaches) would need to transition or change.
- Trigger point: The limit (value or 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.

The SMP Refresh sets out a five-step process in relation to possible trigger use:

- Review and clarify what the SMP states as being the intent for 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 described in **Section 14**).
- Consider what actions may be required to enable transition before and after reaching the triggers (a key part of the Action Plan described in **Section 14**).

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

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

- 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.
- Focusses particularly on the transition period defined at present by epoch 2.
- By defining triggers, encourages early planning for transition, enabling community involvement in the decision-making process, framed within the longer-term approach defined by the SMP.
- Aims to shift attitudes from ‘when have we got to change?’ to one that looks for opportunity to change in a positive manner.
- Sets out a longer-term framework that will move from the SMP to ongoing shoreline management planning that will itself be monitored and progressed beyond the Refresh period.

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:

- Addressing issues identified in the Health Checks
- Supporting ongoing shoreline management planning

The Refresh Health Checks have identified those locations where steps are proposed to progress the SMP; 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 the following:

- 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 in response to the Health Check reports 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 four SMPs covering Wales. Each Health Check provides direction towards SMP policy delivery 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 where specific topics are addressed in more detail in the rest of this document.

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

- Review Health Check report 'Next Steps' and prioritise actions
- Initiate discussion around what to do, how to do, how to finance, and who does it

- Populate Action Plan by setting out responsibilities and scheduling

Following this, the Coastal Groups 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 could facilitate recording the progress made with respect to the Refresh process and recording the changes made to SMP policy. This is discussed in **Section 4.4** and **Section 13**.

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 on 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 the SMP-wide and policy unit level. The sub-sections that follow provide more detail and guidance.

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 each Coastal Group 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 following sections address some common themes:

- SMP governance and maintenance
- Updating the Action Plan
- Improving policy clarity
- Engaging with planners
- Responding to change and engaging with others
- Supporting the natural environment
- Monitoring and triggers
- Climate change
- Incorporating strategies and other new information

SMP governance and maintenance

(a) SMP management

SMP management is the responsibility of each Coastal Group. However, with changes in personnel and a focus on other priorities, individual awareness of the SMPs, including the basis for the policies therein and actions towards their implementation, varies considerably. A recommendation of the Refresh is therefore to use this process as an opportunity to refocus attention on the SMP and to raise awareness of its principles and content. In particular, making the SMP and SMP-related matters a core agenda item for each Coastal Group meeting could help give equal attention to the SMP in addition to other topics of discussion.

This is an opportunity to rekindle or strengthen existing links between the SMP and planners by incorporating Planning Authorities in the Coastal Group. Refer also to the [Engaging planners](#) subsection.

Recognising that some coastal schemes may require funding contributions from non-FCERM sources and that schemes can provide multiple benefits, this is also an opportunity to re-engage with other authorities, such as Welsh Government (from areas covering highways and marine planning), Network Rail, QinetiQ, utility companies and port authorities. These bodies may also be assigned responsibility for undertaking actions identified within the SMP Action Plan.

In some areas, there may also be a need to re-engage with elected members, particularly because many members were not involved in developing the existing SMP, causing political buy-in for some SMPs to weaken over time.

(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 Coastal Group. Coastal Groups should discuss and decide the best fit for SMP governance in their region for consistency in the development of work programmes.

For the North West England–Wales cross-border SMP, a dedicated SMP co-ordinator has been appointed to support, facilitate and oversee the delivery of sustainable coastal management across that SMP area. This is a model that could be adopted elsewhere.

Although it may remain appropriate for individual RMAs (or other authorities) to undertake particular actions, the Coastal Group should remain aware of and co-ordinate these actions. This would 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.

Updating the Action Plan

Maintaining the Action Plan plays a key role in maintaining the SMP and progressing towards the end target. This is discussed further in **Section 4.4**.

Section 14 also provides further guidance on Action Plans.

Improving policy clarity

Under the 2006 SMP guidance, there were four SMP policies available to shoreline managers:

- No Active Intervention
- Hold the Line
- Managed Realignment
- Advance the Line, although this is rarely applied.

There are, however, a number of instances where inconsistency or lack of clarity in the selection of the policy may cause the management intent to be misinterpreted, leading to that intent being compromised. There is therefore benefit in providing greater clarity and consistency regarding what the policy means at each location across all SMPs.

Section 5 advises on how improving clarity and consistency could be achieved and recorded.

Engaging planners

The 2006 SMP guidance recognised a need for improved links with the planning system. Whilst Local Planning Authorities are using the SMP in setting planning policy and to inform development management, it is important that the Coastal Groups continue to engage planners in the process as the findings from the Health Checks are progressed and through the ongoing process of shoreline management planning.

Section 9 provides further detail on how links between the SMP and the planning system could be improved.

Responding to change and engaging others

In some SMPs, a need has been identified to review and identify vulnerable communities where a coastal adaptation 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 Coastal Group (refer to [SMP governance and maintenance](#)), then regular engagement is likely to be needed so that 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.

Section 10 provides direction on adapting to change and engaging with others.

Supporting the natural environment

There have been no changes in policy or guidance on protected sites that require a blanket change in SMP policy. Similarly, there have only been a few instances of changes in the boundaries, locations or numbers of designated environmental sites since the SMPs were produced, and these are not likely to affect existing SMP policies. It is therefore not recommended that a broad-scale assessment of the impact of existing SMP policies be undertaken retrospectively.

There is now a WNMP (Welsh Government 2019a), and Welsh Marine Protected Areas Network Completion project (currently ongoing) is defining new Marine Conservation Zones (MCZs). New national strategies and initiatives will also have a bearing on future consideration of protected sites (**Section 2**).

Where changes in SMP policy are identified, through the SMP Refresh process or ongoing thereafter, bespoke assessments will be required, as part of the overall SMP policy review process (**Section 4.3**) so that the review of policy fully considers the designated sites at that time.

There is also a more general need to support the forecasting of habitat compensatory needs over the short- to medium-term, and to consider and evaluate the potential benefits of in situ restoration and habitat enhancement at a local level to support wider SMNR and well-being priorities. As part of this, it is important that links with the National Habitat Creation Programme (NHCP) (**Section 11.2.6**) are maintained and developed further.

Section 11 provides further guidance on protected sites, and **Section 12** provides guidance on the links between SMPs and Marine Plans.

Management triggers

As discussed in **Section 3**, in all SMPs, there are potential benefits of adjusting from a strict epoch approach to a more transparent approach. This could involve 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.

Although the concept can be applied throughout, as a starting point it is recommended that triggers be defined for specific policy units where there is a planned policy transition (a change from one policy to another over time) in epoch 2, focussing first on the more critical and urgent cases.

Section 6 provides more detail on the definition and use of triggers.

Monitoring

Significant progress has been made to improve the collection of monitoring data since the SMPs were developed, through the establishment of the Wales Coastal Monitoring Centre (WCMC), covering the coastline of Wales.

There is already good collaboration between shoreline managers, the WCGF and the WCMC. But there are locations where use of these datasets could become increasingly important in informing SMP-level decisions. It is therefore recommended that the link between monitoring and the SMPs is maintained and developed further so that the WCMC remains relevant to the SMP and shoreline management process and is responsive to its needs.

It is also recommended that, following any identification of triggers and management indicators, there be a review of monitoring undertaken by the WCMC to confirm that the datasets required to inform trigger assessments are being collected. There will also be a need for regular and focussed analysis to translate monitored data into information that can support SMP-level decision making, where applicable.

Climate change

New climate projections for the United Kingdom (UK) were published in November 2018 and are referred to as UK Climate Projections 2018 (UKCP18). SMP policy along most of the coast is unlikely to be affected by these new data, because 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 (SLR) with projections to the year 2300, meaning future shoreline management intent must be flexible to higher levels of SLR beyond current guidance. This will need to be considered in any future policy reviews.

Climate change projections affect other datasets, such as the estimates of habitat loss or gain and compensatory needs and the 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.

Section 7 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 will alter 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 focussed. Potentially, the changes to policy described therein have not been subject to the same range of strategic considerations the SMP entails so that the implications do not compromise the stated long-term, wider-scale and multisectoral sustainable policy direction.

The Coastal Group should therefore examine the basis for decisions within any 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 WCGF SMP Major Policy Change Process. 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 as 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 (explained in **Section 4.3**).

It is important that any updates (past or future) are clearly recorded within, or linked to, the SMP documents (for example, by using the SMP Status Tracker described in **Section 13**).

4.2.3 Addressing policy unit next steps

A series of checks have been applied to every policy unit within each SMP; these are explained in more detail in each Health Check report. A screening process has been used to identify the policy units where specific checks are applicable.

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

- **Amendments** – Where there is a need to update or provide more information to increase 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** – This is not a recommendation that policy should be changed, but it identifies the potential need for the Coastal 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 following sections discuss each category in turn.

Amendments

Most Amendments relate to policy clarity and the need to redefine or clarify the headline policy.

Section 5 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 (explained in **Section 4.3**). This will depend on the specific circumstance, and a decision will need to be made regarding whether the change means the intent of the SMP will change. Amending policy unit boundaries should consider whether there are likely to be implications locally or on adjacent frontages and whether the implementation of policy will be affected.

Going forward, changes should be recorded (for example, by using the SMP Status Tracker described in **Section 13**).

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 defining 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. Where no change in policy is required, the outcome of the studies should be recorded in the Action Plan when the action is marked as complete.
- **Definition of triggers** – Refer to **Section 3.4** for the rationale behind a trigger-based approach. **Section 6** provides more detailed guidance on the definition and use of triggers.
- **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. **Section 8** provides further guidance on funding.
- **Engaging others** – This includes situations where there is a need to continue or re-engage 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 on future policy implementation. Experience from previous consultations will help define the most appropriate approach to engaging others, which will also depend on the anticipated response and feedback. **Section 9** provides guidance on engaging with planners. **Section 10** provides more information on adapting to change and engaging with others.

- **Response (adaptation) planning** – In planning for future policy transition, detailed adaptation planning may be required in some policy units. This is likely to bring together a range of stakeholders, with engagement being a core part of the process. **Section 10** 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. Also refer to Incorporating strategies and new information in **Section 4.2.2**.
- **Delivering environmental requirements** – The Health Check recommends that in some locations, there is a need to review the environmental implications of the existing management practice or explore opportunities for habitat creation or restoration. This should take into account any changes to the extent, protected features or condition of protected sites. This may also involve liaising with the NHCP. **Section 11** 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 WCMC, but there are some locations where a site-specific study may be required. Also refer to 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 because of changes in circumstances since the SMP. This may relate to coastal processes, funding, environmental status or changes in risk, for example, caused by 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 Coastal Group will need to decide whether there is a need to follow the formal major policy change process or whether the changes can be simply addressed through amendments to the SMP document. WCGF defines major policy change as ‘changes to a policy, or epoch in which a policy is to be implemented, or changes to the Action Plan that are likely to result in this’. **Section 4.3** provides supplementary guidance on revisiting the SMP policy.

Remain Aware

The Health Checks recommend ‘Remain Aware’, where no immediate action is needed but consideration is likely to still be required within the next decade or so. Examples include where potential proposals have been identified that could have an impact on policy implementation in the longer term and some locations where there is a policy transition in epoch 3 that requires earlier action, for example, to develop adaptation plans or start defining triggers.

4.3 SMP policy review

New guidance (2019) has recently been produced by WCGF to set out the process that should be followed by all organisations wishing to trigger a major policy change: Guidance to Major Policy Change Process in Wales. This is available from WCGF.

This section provides some supplementary advice in support of the WCGF Guidance.

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. The WCGF Guidance recognises that uncertainty over the longer term is unavoidable, and therefore, policies may have to be reviewed if new evidence emerges that justifies a major policy change proposal. Both as part of the SMP Refresh process or subsequently, there may be a need to review policy for the following reasons:

- 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 challenges 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 policy implementation is unlikely to be environmentally acceptable or legal.
- There are significant changes in government policy, such as funding, spatial planning, funding for coastal adaptation plans, and 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 is not in line with SMP policy (for example, Hold the Line rather than Managed Realignment) and is therefore potentially inappropriate or in conflict with the SMP intent.
- Management is in accordance with policy, but the 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 (such as by disrupting sediment movement).

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

Other changes to the SMP

The following changes are unlikely to fall under the category of a 'major' policy change:

- Updates made to Action Plans.
- Clarifications to policy wording that do not change the SMP meaning or intent.
- 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 as a result of management triggers (as described in **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 or is due to newly introduced management triggers, this should be treated as a policy review (as explained in **Section 4.3.2**).

- Changes to SMP governance structure.

Recording these changes is, however, still critical to maintaining the SMPs as relevant and up-to-date documents. Changes other than those to Actions Plans should be recorded, for example by using the SMP Status Tracker. **Sections 4.4** and **13** provide further guidance.

4.3.2 Supporting the 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) and should be transparent, consistent and informed by sound evidence. The WCGF Guidance to Major Policy Change Process in Wales sets out the following five-stage process:

- Stage 1: Triggering a major change
- Stage 2: Evidence gathering
- Stage 3: Submission of evidence to Coastal Group
- Stage 4: Decision by Coastal Group
- Stage 5: Approval by WCGF

The WCGF Guidance provides a detailed explanation of each stage of the process. Further recommendations are provided in the following sections, specifically relating to Stage 2 Evidence gathering, with links to the relevant sections of this guidance.

4.3.3 Evidence gathering

SMPs present a policy framework to reduce risks to people and to the developed, historic and natural environment in a sustainable manner. As such, the potential economic, social and environmental impacts of a major change should be undertaken, considering the themes discussed in the following sections.

The level of input should be proportionate to the issue being addressed, and a phased approach may be appropriate, for example, one involving an initial scoping stage. The rationale for a phased approach is that further assessments, such as requirements for a Habitats Regulations Assessment (HRA), may depend on whether a change in policy is concluded as the preferred approach.

Understanding of coastal behaviour and dynamics

Depending on 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, the appraisal should confirm whether there have been significant changes since the SMP, or whether trends of change have remained the same. The appraisal should use data from the WCMC. 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 studies should remain appropriate to the strategic nature of the review and it must be questioned whether they are necessary. If required, these studies 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 refer to 2006 SMP guidance (volume 2, task 3.2a). Different approaches can significantly influence 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. Considerations should include the 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 SLR on the long-term implications, sustainability and viability of the options should also be carefully considered.

Section 5 can be used in defining alternative options.

Section 7 explains the latest climate change projections and how these should be considered by SMPs.

Options 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.

Section 9 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 NRW is recommended to determine the best approach to environmental assessments. It is important that the environmental assessment remain focussed and proportionate, with reporting at an equivalent level to the existing SMP Strategic Environmental Assessment (SEA).

Depending on changes that have occurred since the SMP, new baseline information may 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 a 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, an HRA will be required if the policy unit or units lie within or adjacent to European conservation sites, or are otherwise functionally linked to them (for example, through sediment pathways). An update to the existing Water Framework Directive (WFD) assessment (now replaced by the Water

Environment Regulations [WER]) will be required, as well as a new (light touch) MCZ assessment if any newly designated MCZs may be affected. These must use the most up-to-date information available, which will involve the collection of new baseline data.

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

Section 11 provides further guidance on protected sites and how the SMPs need to consider them.

Section 12.2.2 provides further guidance on the WER assessment required as part of policy reviews.

Section 12.3.3 provides further guidance on the assessment of compatibility with the WNMP required as part of policy reviews.

Section 12.4.3 provides further guidance on the assessment of compatibility with the Local Flood Risk Management Strategy 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 (that is, over a 10- to 20-year time period), 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 grant and from third parties), including an assessment of their scale and likelihood.

Section 8 provides further direction on the Funding Risk Assessment to be carried out as part of policy review.

4.3.4 Updating the SMP to reflect policy changes

Once a major change has been approved by the WCGF, the Coastal Group, as 'owner of the SMP and Action Plan', will be responsible for updating the SMP document accordingly. This should involve the following activities:

- Defining new policy in line with guidance in **Section 5**.
- Updating the SMP Status Tracker – refer to **Sections 4.4** and **13**.
- Updating the SMP Overview for Wales Master document and the relevant information on [DataMapWales](#), the new data platform that is due to replace [L/e](#).
- Making all relevant documentation associated with the policy change available.
- Updating the SMP Action Plan (**Section 4.4** and **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 Coastal Group.

4.4 Keeping the SMP up to date

4.4.1 SMP Status Tracker

It is not easy to establish whether information contained within the published SMP document is current or not, whether any 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 SMP status, this guidance introduces the Status Tracker (**Section 13**), designed to maintain a record of policy changes and documentation updates, 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.

It is recommended that the Status Tracker be maintained by the Coastal Group on a regular basis as and when any changes or updates occur, and at a minimum reviewed annually. This might also be considered as a tool to support delivering on Measure 11 of the National Strategy, which is the requirement for Coastal Groups to report on the status of SMP implementation by the end of epoch 1.

4.4.2 Action Plans

Action Plans set out the strategic actions needed to progress the SMP; as such, there is an initial need to incorporate the additional actions identified by the Health Checks. It is also an opportunity to consider and refresh the actions already included in existing Action Plans and to address some of the findings of the Health Checks with respect to maintaining the Action Plans, which include the following views:

- The Action Plans are too complex in their current format, so are not an effective mechanism for supporting or enabling policy delivery, nor for bringing partners together.
- The Action Plans include too many actions that would be considered day-to-day management activities. Other actions are unclear in terms of scope or rationale, or they conflict. New actions are not being added despite further studies and new information.
- Monitoring of actions was becoming a 'tick box' exercise, with no real progression and little actual ownership.

As well as addressing the Health Check findings, those actions that remain 'live' also need to be captured in updating the Action Plans as part of the Refresh. Going forward, the Action Plan should be seen as a key tool for SMP implementation that can be continually updated to support proactive shoreline management planning.

A new Action Plan template has therefore been developed that should also help address some of the Health Check findings, as well as offering a proposed structure that could also help facilitate annual reporting as required by Measure 10 of the National Strategy. This is set out in **Section 14**.

PART TWO – TOPICS

Part Two comprises a series of sections that contain specific guidance on the following core topics:

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5 Policy clarity

This section provides recommendations on how the clarity of SMP management policy can be improved by assigning subcategories to existing policy units and 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 is identified under one of four basic headline categories:

- No Active Intervention
- Hold the Line
- Managed Realignment
- Advance the Line, although this is rarely applied.

Whilst 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 the SMP intent. Experience shows that sometimes the policy headline is the only piece of information within the SMPs that many parties look at. The headline is open to interpretation, and without reference to the accompanying policy statement, it does not always convey the underlying rationale as to why that policy may have been set.

The approaches set out in this section aim to improve understanding of what is proposed to be delivered and what that deliverable is intended to achieve. This will support a better overall understanding of policies in the context of ongoing management. To achieve this, policy definition and description must be clearer and more consistent.

Clearer and more consistent policy definitions and description are 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 recommended approach to improving clarity and consistency has two components:

- 1) Adding subcategories 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**).
- 2) Clarifying the narrative that describes the management intent that the suite of policies is designed to deliver. This should be a few words that capture the critical considerations at each location (**Section 5.6**).

This information should 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 set out in **Section 3**, the stages of an SMP can commonly be thought of as ‘present’, ‘intermediate’, and ‘future’ states rather than rigid adherence to epochs. With recognition that the end of the first epoch will shortly be reached, the proposed updated definitions can generally be captured as follows:

- Present – The present-day policy being applied (what is currently stated in the SMP for epoch 1).
- Intermediate – The stage between present-day and future target, which may require a transition in policy (timing varies, depending on the specific requirements for each policy unit).
- Target – The long-term policy that will be achieved by following the plan (generally what is currently stated in the SMP for epoch 3).

Note that the intermediate stage may not always exist, especially if the target remains the same as the present-day policy.

5.3 Addressing findings from the Health Check

5.3.1 Assign subcategories

It would be beneficial if the extended descriptors (subcategories) are initially applied to all policy units across all SMPs. It is recommended that this be 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 subcategories to be used and guidance on how those can be mapped onto existing SMP policies.

The aim of the initial exercise is not to alter the headline policy category contained in the SMP; instead the objective is to provide greater clarity on the existing policies (unless a need to revisit the SMP policy, as described in **Section 4.3**, leads to a 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. Whilst greater consistency would be welcome and should be introduced going forward (**Section 5.4**), it is considered impractical at this time.

5.3.2 Clarify management intent

The Health Checks confirm 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 the explanation should be briefly summarised, ideally in a single sentence. Guidance to help formulate the explanation is set out in **Section 5.6**.

5.3.3 Produce SMP policy summary

The details arising from these updates should be captured in a table summarising this information across the whole SMP. The recommended 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 subcategory

The tables in **Section 5.5** provide details on the categories and subcategories that can be applied and guidance on how those should be used. However, some subcategories in those tables occur under multiple headline labels, reflecting current inconsistencies between SMPs.

To improve consistency, it is recommended that this duplication be 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**.

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**, the summary 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

Details arising from the change could be included as an update to the SMP Status Tracker (explained in **Section 13**).

5.5 Policy subcategories

The following tables set out the list of policy subcategories to be applied, which provide an additional layer of information describing the approach intended to deliver the SMP for each policy unit. Notably, the intention is not to redefine any policies or management intent. These additional descriptors are therefore intentionally 'blunt', as their purpose is to provide more clarity of what the policy statements actually state and reduce any ambiguity or misinterpretation.

Included in the tables is guidance on determining where each of these subcategories be applied, noting that any new works would require the necessary consents, licences and approvals to be in place.

Subcategories should be applied with reference to the headline policy – refer to **Section 5.5.1** for No Active Intervention policies, **Section 5.5.2** for Hold the Line policies and **Section 5.5.3** for Managed Realignment policies.

Using the descriptions in the right-hand column, select the subcategory that primarily describes the intended management approach stated in the SMP policy statement. The greyed-out cells identify those subcategories should not be used where a policy change is made.

5.5.1 No Active Intervention

Policy Subcategory	Application
No need to Defend	Where there are no assets at risk and no defences are present. There is no requirement or intention to introduce defences.
Do not Defend	Where no defences are present, and it would be technically or environmentally unacceptable to introduce any because of the impact.
Cease to Maintain	Where defences are present, but the intent is that no further works are carried out to maintain them.
Local Activity Only	Where works to repair or construct short stretches of defences within a long length of otherwise No Active Intervention shoreline might be proposed to provide local protection (such as to a slipway, access point or isolated properties).
Remove Defences	Where defences are present, and the intent is to remove them. This category should only be used as part of the initial post-Health Check exercise (Section 5.3). For future policy changes this would be captured under Managed Realignment.

5.5.2 Hold the Line

Policy Subcategory	Application
Maintain / Replace	Where protection is currently provided by coastal defence structures or managed beaches, and the intention is to retain defence along current alignment, replacing any failed defences as necessary and if justifiable. This can include modifying defence structures and altering the Standard of Protection.
New Defences	Where no defences currently exist, but the intention is for new defences to be introduced, potentially following a No Active Intervention or Managed Realignment policy.

Policy Subcategory	Application
Repair not Replace	Where protection is currently provided by coastal defence structures that might be maintained and repaired, but not replaced at failure or at the end of their life.
Temporary Intervention	Allow non-permanent or short-term measures that temporarily reduce flood or erosion risk (such as while transition measures or adaptation plans are being established).
Local Activity Only	Where works to repair or construct short stretches of defences within a long length of otherwise No Active Intervention shoreline might be accepted to provide local protection (such as to a slipway, access point or isolated properties). This category should only be used as part of the initial post-Health Check exercise (Section 5.3). For future policy changes, this would be captured under No Active Intervention.
Natural Features	Where the intent is to maintain the integrity of the natural feature (such as a dune, spit or shingle barrier) to provide a defence function rather than fix its position by active management of the natural feature but not structural intervention. This category should only be used as part of the initial post-Health Check exercise (Section 5.3). For future policy changes, this would be captured under Managed Realignment.

5.5.3 Managed Realignment

Policy Subcategory	Application
Set-back Defence	Where the intent is to defend elsewhere in flood plain inland from present shoreline, or allow erosion or retreat to a defined alignment, where new defences could be constructed at that new location.
Slow Erosion	Where non-permanent or short-term measures would be accepted that slow, not stop, erosion of cliffs or soft backshore.
Remove Defences	Where defences are present, and the intent is to remove them to allow the shoreline to begin to realign (erode or flood to higher ground).
Natural Features	Where the intent is to maintain the integrity of the natural feature (such as a dune, spit or shingle barrier), but not fix its position, by active management of the natural feature but not structural intervention.

Policy Subcategory	Application
Repair not Replace	<p>Where protection is currently provided by coastal defence structures that might be maintained and repaired but not replaced at failure or at the end of their life.</p> <p>This category should only be used as part of the initial post-Health Check exercise (Section 5.3). For future policy changes, this would be captured under Hold the Line.</p>
Local Activity Only	<p>Where works to repair or construct short stretches of defences within a long length of otherwise No Active Intervention shoreline might be accepted to provide local protection (such as to a slipway, access point or isolated properties).</p> <p>This category should only be used as part of the initial post-Health Check exercise (Section 5.3). For future policy changes this would be captured under No Active Intervention.</p>
Placeholder	<p>Situations where Managed Realignment has been used as a placeholder because of a lack of knowledge, for example, where further studies were needed to confirm approach.</p> <p>Situations where Managed Realignment has been used as a placeholder because of uncertainty on a policy relating to a dependency on other asset owners (for example, to relocate a highway or golf course), and where there was a need for measures to first be developed to relocate people.</p> <p>Situations where a Managed Realignment policy has been set to deliver a suite of different actions across a management area.</p> <p>This category should only be used as part of the initial post-Health Check exercise (Section 5.3). For future policy changes, these would be reassigned as appropriate to the outcome of the further assessments.</p>

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. The reason for a policy being set is not always apparent to those seeing the headline policy alone, and the headline 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 policy review).

The narrative 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 the narrative 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 a series of standard statements for describing the rationale. But for consistency in the structure of these summaries, the following key components should be considered when producing them:

- State the principal reasons for the policy selection, especially where this might not be immediately apparent.
- If relevant, indicate 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 providing 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 addressing these ambitions or pressures is contrary to the wider management intent.

Examples include the following situations:

- Where erosion is critical for supplying sediment to beaches farther along the coast
- Where management of natural features is a vital part of the defence infrastructure, such as the role of a beach in dissipating wave energy
- Where there is a need to provide compensatory habitat to enable defence to other locations
- Where there is critical infrastructure that requires protection, 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 and 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 as follows:

- Defend local community from flooding, but through measures that do not halt alongshore sediment drift.
- Town and associated infrastructure critical to tourism and regional economy, requiring protection that includes provision of beach as part of the defence.
- Allow 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, subject to obtaining the necessary consents, licences and approvals.
- 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.

How to capture this rationale alongside the policy categories and subcategories within the SMP Status Tracker is set out in **Section 13**.

5.7 Removing inconsistent use of policy subcategories

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

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

5.7.1 Raising defences or changing the Standard of Protection

The 2006 SMP guidance (volume 1, section 13) clearly defines Hold the Line as '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 of Protection should be, based on the economics of flood or erosion risk management.

The outlined approach would not, however, preclude the inclusion of any such clarification in the statement of management intent, for example, should the Standard of Protection be seen as a key driver or critical to the policy selection.

5.7.2 Non-FCERM and 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 that run along the coast, which would be defined as No Active Intervention.

The basis for policy definition should be exactly the same for these assets as for areas where RMAs have a responsibility. They should not be different simply because those situations may need to be funded outside of an FCERM grant. 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 subcategory added, such as **Hold the Line (Maintain / Replace)**.

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

5.7.3 Natural features

The policies Hold the Line, Managed Realignment and No Active Intervention are all currently used to represent very similar situations.

Where natural features exist, and there is no intent or expectation of any defence management intervention, the policy should be categorised as **No Active Intervention (No need to Defend)**.

Where there may be some requirement to manage these features in the future, for example, to prevent or repair breaches of dunes or barrier beaches that 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.

5.7.4 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 accepted) that have little impact on the overall natural functioning of that stretch of coast.

Given that 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 on that natural function, these situations should all be captured as **No Active Intervention (Local Activity Only)**, not Hold the Line or Managed Realignment.

5.7.5 Repair not replace

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

Where the policy applies to defences throughout the entire policy unit, this situation ought to be captured as **Hold the Line (Repair not Replace)**.

Where the policy applies to isolated defences, on an otherwise undefended natural shoreline, and the intent is for that shoreline to function as naturally as possible, including currently defended sections, then these policy units would be captured as **No Active Intervention (Local Activity Only)**.

5.7.6 Outflanking

Where defences need to be extended 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 is 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)**.

5.7.7 Defence removal

If the intention is to actively remove defences and provide defences on a new landward alignment this should be categorised as **Managed Realignment (Set-back Defence)** followed by a policy of Hold the Line (Maintain or Repair).

If the intention is to actively remove defences to allow a return to natural coastal functioning this should be categorised as **Managed Realignment (Remove Defences)**. This policy would typically be followed by a No Active Intervention policy with the most appropriate subcategory defined by subsequent intentions.

5.7.8 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, which further states 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, the following are examples of **Hold the Line (Maintain / Replace)**, not Advance the Line:

- Where works are undertaken to develop a beach in front of an existing seawall, including any control structures required.
- Where a seawall requires additional rock protection at the toe
- Rebuilding with a new line of sheet piling in front of the existing toe to sustain that existing defence line

Notably, this would not preclude the need to consider the impacts of such works, such as on coastal processes and the environment.

Given the very limited circumstances where Advance the Line might be used, namely, to extend land development seaward, no policy subcategories are required.

5.7.9 Other applications

Relocation activities

Since developing the SMPs, RMAs now often work with communities in new ways to address the impacts of coastal erosion or flooding. 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 on 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 subcategories detailed in **Section 5.5**. As such, the need for adaptation measures,

such as property relocation, does not in itself denote an SMP policy of Managed Realignment. Engagement with those affected by these policies should make these distinctions clear.

Placeholder

Managed Realignment has already been applied as a 'catch-all' in some cases to cover a multitude of other situations, including where there is a dependency on other assets or landowners taking non-defence-related actions (such as to relocate a highway or golf course), or where the intention was for No Active Intervention, but because of the impact on communities, there was a need for 'adaptation' measures to be developed. This can, however, be misleading for those using the SMP.

Although a placeholder subcategory has been identified to capture those that already exist, this should be avoided in any future policy review, which should include a clear plan of how the intended policy will be implemented, including any adaptation measures.

6 Management triggers

The section provides guidance on how to translate the concepts introduced in **Section 3** by identifying and applying triggers within SMPs, particularly for those locations where a policy transition is planned. Having determined where a move towards a trigger-based management approach might be warranted now, this section is intended to help Coastal Groups determine how to proceed for those locations and assist with identifying the associated monitoring and regular review.

6.1 Definitions and distinctions

6.1.1 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 that can reach a point where existing policies and responses (such as management approaches) would need to transition or change.
- **Trigger point:** The limit (value or occurrence) relating to the trigger that, once reached, would result in policy transition or change.

6.1.2 Change

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

- 1) Defining the appropriate point for **policy transition** (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, as covered by the second point, being enablers or constraints on how the shoreline is managed. 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

It is not the intention that triggers are set for all locations, and initially, the application is likely to be only for situations where a policy transition or other key implementation actions might be planned during epoch 2. It is recommended that Coastal Groups prioritise those specific policy units, focussing first on more critical and urgent cases. In the first instance, this may not have to include all five of the steps outlined; in many cases, it will already be valuable to make the triggers explicit that are currently implicitly contained in the policy statements.

6.2.1 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's taking place. A better appreciation of timing allows the necessary planning and actions to be put in place at the right times for support.

To apply triggers to inform this process, there are five steps:

- a) Determine which key trigger type(s) is relevant to the transition in policy.
- b) Establish for each trigger type the level or threshold that will require transition.
- c) Estimate the timing when that trigger level is expected to be reached.
- 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.

Steps (d) and (e) need to be acted on at the appropriate time. Actions may include commencing engagement activities, sourcing funding or establishing coastal adaptation plans for those affected by the transition in policy and management approach. These should be captured in the Action Plan (**Section 14**).

6.2.2 Identifying trigger types

Trigger types may be considered under two broad categories:

- Physical Processes
- Enablers and Inhibitors

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 as capacity for change, for example, the time needed to relocate communities or infrastructure.

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

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

Examples of Enablers and Inhibitors that can drive, enable or restrict the requirement for action or change, include the following:

- New information, studies or knowledge becomes available that challenges the appropriateness of the SMP policy.

- Insufficient funding or 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 or people, meaning intervention requirements change.
- Changes in land use or development, including new development or decommissioning of sites, which may increase, decrease, enable or hamper intervention requirements.
- Changes to commercial or industrial operations with associated coastal defence function, such as railway embankments and port structures.
- Changes in social attitudes, altering the acceptance or otherwise of environmentally sustainable or unsustainable practices, provision of FCERM, and the like.
- New designations or habitat adapted, requiring a change in policies to prevent negative impacts or support (extent or timing).
- Changes to legislation or national policy, alters objectives and requirements for coastal risk management at the coast.

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

6.2.3 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') with 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. This threshold level would be the defined 'change' point at which the policy transition or 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. But in broad terms, those relating to Physical Processes are more likely to be quantifiable. For example, rates of erosion, SLR, deterioration and 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.

6.2.4 Examples of the use of triggers

Coastal Change Adaptation Planning Guidance (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 the following:

- More detailed work being done to define a set-back area in which Managed Realignment will occur, with triggers needed to enable Managed Realignment 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 and performance), then that may trigger implementation of Managed Realignment.

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

- It becomes unviable to continue to justify ongoing maintenance, repair or capital replacement of existing defences, so the operator must decommission.
- It becomes undesirable to continue to retain a defence along the shoreline because of the adverse impacts doing so will have on downdrift 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 is within a set distance of the seaward edge of assets at risk.
- When existing defences become outflanked by erosion of adjacent shoreline to the extent that there is an increased risk of defences failing.

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, because of scientific uncertainty in some of the processes driving the climate change variables and in the future rates of greenhouse gas emissions. However, there is confidence that 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 in 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.

The Well-being of Future Generations (Wales) Act introduces ‘five ways of working’, and the National Strategy encourages using these in FCERM. This includes consideration of long-term climate change predictions (discussed in **Section 10.3.1**).

7.2 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 references 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 the strategic level of the SMPs, without compromising the general conclusions and is currently reflected in SMP outputs as follows.

7.2.1 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.

7.2.2 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 mapping 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. In some cases, alternative scenarios were also used, such as the UK Climate Projections 2009 (UKCP09) H++ scenario, which projected total SLR of 2 metres by 2100 compared with 1 metre from the 2006 guidance. As such, adopting different SLR values could affect flood extents, depending on the topography of the flood area, but it is unlikely to significantly affect the overall SMP management intent, which is generally not based on a specific Standard of Protection (**Section 7.2.4**).
- 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 bands are not 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.

7.2.3 Nature conservation assessments

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

The approach to calculating habitat loss 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 affect habitat loss estimates and, consequently, compensation requirements and also choice of policy.

7.2.4 Coastal defence assessments

Coastal defence assessments in the SMPs mainly focussed 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 and potentially increase exposure, which can accelerate the rate of deterioration and reduce residual life. Residual life appraisal typically uses reported asset data and is considered in policy implementation and transition timings.

Neither the Standard of Protection nor residual life typically drive SMP policies or long-term management intent, but they are important when considering the timing of policy transitions. However, the consideration of the impact of climate change on 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 affect policy recommendations.

7.3 Climate change projections and guidance

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

- The [Marine report](#) (Palmer et al. 2018) provides a detailed review of past and potential future SLR and storms.
- The [UKCP18 Factsheet: Sea level rise and storm surge](#) (Met Office 2018) summarises key items that are relevant to shoreline management planning.

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, mainly because of the new treatment of land ice contribution to SLR.

The publication *Adapting to Climate Change: Guidance for Flood and Coastal Erosion Risk Management (FCERM) Authorities* (Welsh Government 2021b) provides supplementary information to the FCERM Business Case Guidance (Welsh Government 2019b) and supports the National Strategy (Welsh Government 2020). It is used to consider the impacts of climate change within the development of all FCERM projects and strategies and is based on UKCP18.

The new SLR allowances are in the same range as the values used in the development of the current SMPs (even though these were based on UKCP05). Considering the uncertainty and the fact that precise numbers rarely drive SMP policy, this means that the basis of the SMP appraisals, and the associated SEA, HRA and other assessments, remains valid and there is no need for a wholesale review of policies against new SLR predictions.

- Allowances used for the current SMPs were based on Defra's guidance at the time. Using this guidance, the total SLR by the end of epoch 3 for Wales was predicted as 1.0 metre.
- The latest Welsh Government guidance (2021), based on the UKCP18 projections, provides a mean SLR of between 0.95 and 1.11 metres (depending on Local Authority area) for the 95th percentile (Representative Concentration Pathway 8.5, which reflects an increase in global mean surface temperature of around 4.3 degrees Celsius by 2100). The guidance also extrapolates SLR rates to provide mean sea level allowances up to 2120.

In addition, 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 affect shorelines beyond current SMP timescales. It also 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 latest guidance refers to a High++ (H++) scenario, with SLR quoted as exceeding 2 metres up to 2115 in the 2019 guidance, which would have significant implications for much of Wales' coastline and potentially change the viability of current shoreline management policy nationally. The guidance suggests that the H++ scenario should be considered for sensitivity purposes, covering the period to 2120 only where the consequences of flooding or erosion could be extreme with that scenario.

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 (explained in **Section 6**). In some instances, it may be appropriate to undertake a sensitivity test where a more rapid rate of SLR could affect policy viability.

Of the SMP outputs listed in **Section 7.2**, it is only flood mapping and intertidal habitat loss that typically used a specific future climate change (SLR) projection and that are considered sensitive to the adoption of different SLR values. As such, it is unlikely that the application of the latest Welsh Government guidance (2021) would result in significant changes to the underlying analysis; 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 in **Section 7.2**. It is therefore possible that changes to 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. Therefore a wholesale revisit of SMPs is unwarranted.

However, although the SMPs already take into account the impacts of climate change in the policies that are set, the potential remains for changes to occur faster than previously predicted, or for 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.

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 define a sustainable approach. 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 **Section 7.2**, there are a number of ways climate change will influence future shoreline management decisions.

In terms of SMP policy, these include the following:

- Increased areas, and hence receptors, at risk of flooding, erosion or landslides, influencing viability of protection policies
- Narrowing intertidal areas caused by coastal squeeze, reducing viability of Hold the Line policy options as a result of habitat loss and increasing the need for habitat compensation or mitigation, which could in itself drive policy setting
- Larger structures required to improve or maintain protection to at-risk areas, increasing environmental impacts and costs, potentially reducing viability of protection policies.

In terms of policy implementation, these include the following:

- Increased overtopping of coastal structures requiring earlier intervention to manage or potentially triggering a transition in policy where appropriate
- Increased damage or 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 or 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 new appraisals. 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 2120 or under a H++ scenario) on the long-term shoreline management intent for the policy unit. Confirm that the proposed policy sequence remains viable under accelerated or longer-term SLR. 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 Check 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 net-present-value calculation methods, based on HM Treasury guidance, are meant for 'time-now' justification of investment, but they do not capture the range of factors that determine what is the most sustainable longer-term shoreline management approach. In particular, funding rules can 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.

Nonetheless, affordability and funding are critical factors for implementing policies, particularly where interventions or actions are going to be required soon; therefore, 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 affordability and funding is set out in the following sections and is intended for two situations:

- 1) Policy units with funding challenges, as flagged up by the Health Checks
- 2) In the context of policy review or where funding appears to threaten policy delivery within that immediate planning timeframe.

8.2 Overview of the approach to FCERM grant funding

FCERM grant funding is sourced from Welsh Government and is administered through Welsh Government FCERM Branch. RMAs – Local Authorities and NRW – can use it for a range of activities that help reduce the risk of flooding and coastal erosion.

All schemes receiving Welsh Government FCERM funding must be shown to be reducing risk to life by reducing risk to homes. Schemes may also provide a risk reduction to businesses and infrastructure as a wider benefit; however, homes remain the foremost priority for grant funding. Where wider benefits to third-party assets are also identified, Welsh Government expects RMAs to investigate and, where possible, obtain contributions towards the costs of the scheme from these sources. Schemes involving joint working between Local Authorities and NRW or multiple local authorities are also encouraged and eligible for funding.

In line with the Well-being of Future Generations (Wales) Act and the business case guidance, RMAs applying for funding are also encouraged to identify wider benefits that could be achieved through flood and coastal erosion risk management works. This could include regeneration opportunities, increase in or improvements to habitats and biodiversity, or recreational benefits. However, funding for these wider benefits may not

be eligible under the FCERM grant funding, and alternative funding mechanisms may need to be found.

Further details can be found in the following Welsh Government documents:

- Flood and coastal erosion risk management: grant memorandum (May 2020)
- Flood and coastal erosion risk management (FCERM): business case guidance (2019b).
- Scoring methodology for prioritising FCERM grant funding (Eng) (forthcoming).

Importantly, policies in the SMP (for example, 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 grant funding. Notably, neither the grant memorandum nor prioritisation methodology refer to SMPs, although the business case guidance does require the FCERM strategic fit and context for a scheme to be identified, with reference to SMPs.

8.3 Addressing findings from the Health Checks

Although the Health Checks have not highlighted many specific funding challenges in the foreseeable future for policy units, at an SMP-wide level, there are perceived future challenges with obtaining both Welsh Government FCERM grant funding and contributions from third parties to deliver on aspects of the SMPs. In particular, there is a lack of awareness on the part of other 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. Recommendations are for engagement with potential beneficiaries to explore funding sources in line with Welsh Government expectations and development of a funding plan for the envisaged intent of management.

Guidance, based on current FCERM grant funding arrangements, is provided in **Section 8.4** on how best to approach situations where availability of funds may constrain delivery of the preferred policy now or in the future.

There are also cases where a Health Check recommends 'Revisit SMP Policy'. **Section 8.5** provides guidance on how funding considerations should be incorporated in this instance.

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**.

8.4 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 assessment

should focus on a period of up to 20 years in terms of any actions required during that time to help finance policy delivery. It involves the following four steps:

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

This is illustrated on **Figure 8-1**, with further detail provided in **Section 8.5**.

8.5 Addressing affordability issues

8.5.1 Principles

Whilst 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 questions 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?

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 (**Section 4.3**).

8.5.2 Third-party funding and management intent

Welsh Government FCERM Board guidance encourages RMAs to identify and obtain partnership contributions from third parties wherever possible and especially where the assets of these third parties will benefit.

However, just because funding might 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 other parties seeking to defend land or assets. If defence intervention 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), it 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 Coastal 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.

8.6 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 (**Figure 8-1**).

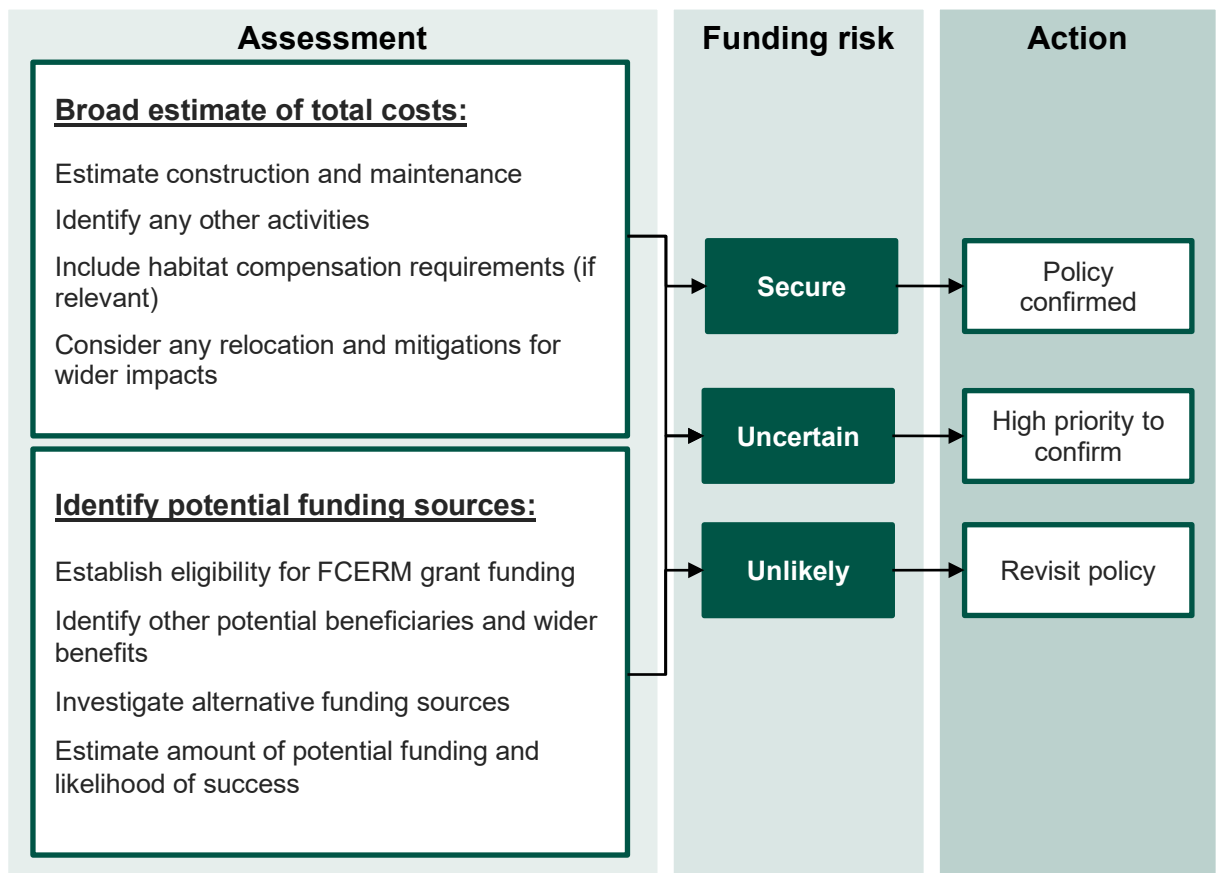


Figure 8-1. Funding Risk Assessment (overview)

8.6.1 Broad estimate of total costs

Estimates 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. Costs estimates must also consider legal habitat compensation requirements, and where appropriate, costs related to any relocation of property and infrastructure resulting from the policy.

A detailed and precise estimate is not required; the estimate can be indicative and based on directly available information.

8.6.2 Identify beneficiaries and potential funding sources

Although developed as an FCERM plan, the SMPs look at integrated outcomes, and this should also be reflected in funding. Delivery of SMP policies therefore has to consider 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 instance, 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.

Even if FCERM grant 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 grant: 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.

Additional wider potential benefits should also be considered (for example, opportunities to provide biodiversity or carbon offsetting). This could include the identifying or creating areas of managed realignment and compensatory habitat, which would then be included within the NHCP. Business Case Guidance notes that consideration should be given to the estimated potential loss of intertidal habitat and costs for potential compensatory habitat as a result of coastal squeeze caused by SLR. This especially applies to options that implement ‘Hold the Line’ policies, as identified in an adopted SMP. Consequently, it would be advisable to identify and consider costs for potential wider compensatory habitat at the time of any high-level SMP affordability assessment.

The benefits of the SMP policy can often 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 Coastal Group where benefits may exist over a wider area than a single policy unit.

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 following:

- Contribution to the local economy of the area benefitting from a coastal scheme
- What local plans and other (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 any new studies to inform discussions, a range of viable ways forward from a funding perspective can be identified.

8.6.3 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, 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 the threshold 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, it must be made 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 trigger (refer to **Section 6**).
- **Unlikely:** There is a need to review whether the preferred policy is realistic. This could lead to a change in timing, linked to triggers (as explained in **Section 6**), but in some cases could also change the underlying intent of management.

In such situations, there is a risk that the approach defaults to No Active Intervention, 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 grant 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.

8.6.4 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 FCERM grant funding 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, and highlights 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 coastal risk is managed by RMAs has evolved.

9.1.1 Overarching National Planning Policy

Overarching planning policy at a national level in Wales is provided by *Future Wales – The National Plan 2040, Planning Policy Wales (PPW)* and associated Technical Advice Notes (TANs) and circulars. Below each of these sit strategic development plans and local development plans. **Figure 9-1** demonstrates how various guidance and strategies fit in the planning context. SMPs are non-statutory and are therefore not an official part of the planning framework. However, they should be used to inform development plans through the growth strategy and planning policy at a local level through site allocations and constraints. In addition, when SMP policies are reviewed, when SMP policies are reviewed, they should consider local planning policy, including site allocation.

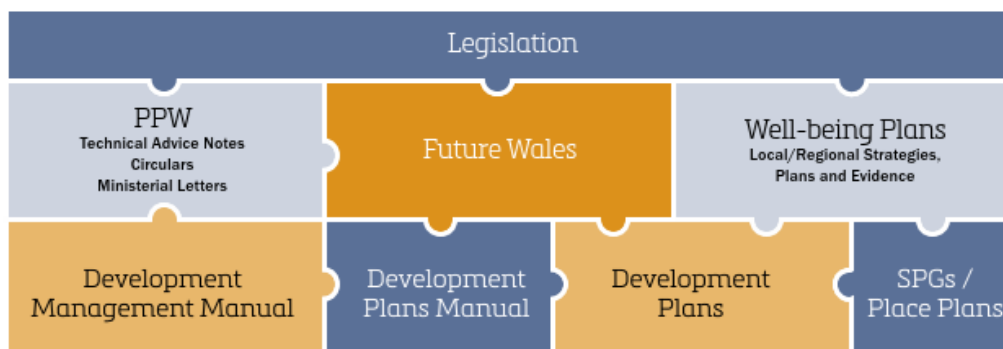


Figure 9-1. The Planning Framework in Wales

PPW's primary objective is to ensure that the planning system contributes towards the delivery of 'sustainable development' and improving the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties, such as the Socio-economic Duty.

When taking strategic decisions, the Socio-economic Duty also requires relevant public bodies to have due regard to the need to reduce the inequalities of outcome that result from socio-economic disadvantage, which could include the socio-economic impacts associated with SMP policies. This is relevant to the production of Local Development Plans and Supplementary Planning Guidance but also needs to be taken into account in refreshing the SMPs.

The non-statutory basis of the SMPs means that there are circumstances where the planning system will have a preventative and early role to play and is capable of both avoiding the creation of problems and securing multiple benefits through positive and proactive planning approaches. The planning system can be justifiably proactive in providing policies to address future anticipated coastline alignments, identify Coastal Change Management Areas (CCMAs) and control development in areas of climate change risk.

Welsh Government's preference is for the SMP position for each section of the coast to be supported in Strategic and Local Development Plans and Strategies relating to infrastructure, development or activity on the coast, such as marine planning, agriculture or housing.

National planning policies for Wales are set out in PPW (2021), which was published in February 2021 after all second-generation SMPs were completed. PPW provides the framework by which local development plans are produced.

9.1.2 Specific National Planning Policy

PPW is supported by 19 TANs that together provide the planning framework in Wales. Of these, TAN 14: Coastal Planning (1998) and TAN 15: Development and Flood Risk (2004) have the most relevance to SMPs. Annex A of TAN 14 is specific to SMPs. Both TANs are in the process of being updated, with a combined TAN being published later in 2021. It is the intention of the revised TAN 15 to set out the technical advice on the risks of coastal erosion and flooding, the approach to be taken when planning for the coast, the need to assess the role and integrity of coastal defences and to demonstrate a detailed understanding of risks from flooding and coastal erosion.

PPW sets out 'Making the best use of resources' as a key planning principle. It states that 'The efficient use of resources, including land, underpins sustainable development'. The planning system has a vital role to play in making development resilient to climate change, decarbonising society, developing a circular economy for the benefit of both the built and natural environments, and contributing to the achievement of the well-being goals. The proximity principle must be applied to solve problems locally rather than passing them on to other places or future generations. This will enable the sustainable use of land and other resources in the long term.

Paragraphs 6.5.16 to 6.5.20 of the PPW deal with SMPs. They state that the priorities contained within the SMPs should influence and inform the preparation of development plans. Where it is established that coastal defences will no longer be maintained, development plans should include clear and specific policies to manage development in such areas, including where they consider development would be unsuitable or where specific characteristics should be considered and addressed.

In providing for decision making in the long term, new development and changes to existing development in areas of coastal change should only take place where the risks and consequences are understood and can be acceptably managed over the lifetime of the development. Civils structures may have a design life of 120 years, though component parts within the structure would likely need replacement during this time.

9.1.3 Strategic and Local Planning Policy

There is provision within the Planning (Wales) Act 2015 for the creation of Strategic Development Plans where several Local Planning Authorities can work together to produce a more strategic approach to development planning on a cross-border basis. The use of this power could be beneficial to more spatial solutions that may be highlighted as needed in relevant SMPs.

Local Development Plans are the key documents by which Local Planning Authorities set out their vision for future development within their Local Authority area or, where relevant, their National Park Authority Area. Local Development Plans (LDPs) are the core link between the non-statutory SMPs and the statutory planning system. 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.

It is important that risks and opportunities identified by the SMPs are embedded within planning policy through the LDPs so that consistent development management decisions are made, which can prevent increased risks and consequences to people and property, and so that natural resources are managed sustainably.

Whilst LDPs have a much wider remit than the SMPs and are statutory, the SMPs provide the additional information regarding coastal change and associated risks. Development in coastal areas requires the characteristics and challenges posed by such a location to be identified and assessed, and these should be considered in the preparation of development plans so that the plan is sound. These characteristics and challenges are also relevant considerations for the planning authority when determining a planning application.

9.1.4 Flood and Coastal Erosion Risk Management Strategy

Measure 17 of the National Strategy provides a policy steer that Welsh Government wants ‘Planning and FCERM policies to complement each other, reducing risk by preventing inappropriate development in the flood plain and helping Planning Authorities make clear decisions based upon the best available information’.

Paragraph 176 of the National Strategy states, ‘A Shoreline Management Plan (SMP) is a large-scale assessment of the risks associated with coastal processes. They are non-statutory documents but Welsh Government want to see them considered both in local decision making and strategic planning, such as Local Development Plans and Local Flood Risk Management Strategies’.

In paragraph 183 it goes on to state, ‘The preferred management policies set out in SMPs should influence and inform the preparation of Strategic and Local Development Plans and their coastal policies. Particular attention should be paid to where a change of coastal policy is proposed in an SMP, where coastal defences will no longer be maintained, or where a Managed Realignment policy will be established. Development plans should include appropriate policies to manage development in such areas. This may include identifying areas where development would be unsuitable or where coastal adaptation demands policies be set out to help support any long-term masterplan for property and infrastructure in the area’.

9.1.5 Coastal Change Management Areas

In England, CCMAAs are defined as part of the planning system. There is no equivalent requirement in Wales, though some coastal local authorities use a similar approach for identifying areas of land that are at risk of inundation from the sea or coastal change both in the short and long term. Examples include the following:

- Pembrokeshire Coast National Park Authority – Coastal Change Management Areas Methodology Background Paper (January 2018). This background paper was used to identify areas within the Local Authority area that should be designated as Coastal Risk Management Areas within the replacement Local Development Plan.

- Anglesey and Gwynedd Joint Local Development Plan (adopted July 2017) – Appendix 6 Coastal Change Management Areas.

Significantly, in both examples, the documents go beyond mere reference to restriction of new development and acknowledge the issues associated with loss of existing development. However, this tends to be limited to policy relating to relocation within areas supporting existing communities. It is recognised that actual adaptation of existing communities requires collaboration beyond the remit of Planning, although at present, there is no clear remit as to where these broader issues reside.

It is also noted that in relation to the Anglesey and Gwynedd Joint Local Development Plan, the focus for CCMA designation relates to SMP policy change occurring between epochs 1 and 2 (rather than to the longer-term intent of management set out in the SMP), with reference solely to areas where policy changes to Managed Realignment or No Active Intervention. As discussed in **Section 10**, there is a recognised need to also potentially consider areas with a Hold the Line policy, where the SMP identifies increased risk.

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 there may be benefit in further development of the CCMA concept more formally for Wales. In addition, where there may be a need for policy reviews (**Section 4.3**) arising from the Health Checks or in the future, these 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 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 (**Section 4.3**) so that any proposed changes to SMP policy achieve the following:

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

The level of involvement required 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 could help facilitate this (**Section 13**).

9.4 Improving communication of coastal risks

9.4.1 Involving planners in decision making

The 2006 SMP guidance recommended that planners be 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 various 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.

The Health Checks indicate that many Local Planning Authorities are using the SMP in setting planning policy and to inform development management. Alongside this, it is important that the Coastal Groups continue to engage planners in the SMP process, in the next steps of addressing the findings from the Health Checks, to be followed by the ongoing process of shoreline management planning.

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

There would be a benefit if Coastal Groups included representatives from Strategic Planning and Development Control to improve communication between the SMP and the decision-making process for identifying land allocations and development consent decisions, taking into account the risk associated with coastal change.

At present, there is concern that SMPs are not being fully promoted to the wider audience, including planners, but also with respect to the role of Public Service Boards (PSBs), other stakeholders and politicians. To a degree, this identifies a gap as to who has a remit in managing this process. In line with, and building on, the discussion of governance covered in **Section 4.2.2**, specifically with reference to the opportunity to rekindle or strengthen existing links, the Coastal Groups should consider reviewing their Terms of Reference. Specifically, this would include a review of how the Groups more actively engage with PSBs, Planning Authorities, decision makers and elected members, revitalising political support and progressing collaborative working in taking forward the SMPs.

9.4.2 Keeping the SMP current

Typically, the evidence base that informs planning policy must 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 may be through updates to an SMP digital platform and recording policy or SMP document changes in the SMP Status Tracker (**Section 13**), with the latest date being 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. The rationale behind the SMP policy is also relevant.

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

9.4.4 Risk mapping

Risk zone mapping (flooding, erosion or instability) is a key SMP output used in planning documents, defining CCMA's and decision making. The National Strategy Measure 9 requires NRW to confirm that the National Coastal Erosion Risk Maps match SMP policies by 2021 and show erosion rates as bands in the Wales Flood Map products by end of 2022.

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 more frequent review (for example, on a 3-year basis). In addition, any data that emerge from a review of SMP policy should feed into the maps. This information should be maintained on (or linked via) the SMP digital platform (portal) so that those accessing data are using the latest available.

9.4.5 A planners' guide to the SMP

Some local authorities, more generally throughout the UK, 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. A good example in Wales is Pembrokeshire Coast National Park Authority's 2018 document Coastal Change Management Areas Methodology Background Paper. This background paper was used to identify areas within the Local Authority area that should be designated as Coastal Risk Management Areas in the replacement Local Development Plan.

However, it is also useful to refer to examples from England:

- Managing Coastal Change: Coastal Risk Planning Guidance for West Dorset, Weymouth & Portland (Halcrow 2013).
- Scarborough Planner's 2010 Guide: North Yorkshire Coast Shoreline Management Plan – what it means for the Scarborough Local Development Framework (available from Scarborough Council Council) .

These guides can be an effective way to communicate key messages from the SMP in a concise and focussed form to raise awareness. Where the Health Checks have 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 guides will vary, they can accomplish the following:

- 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, including identification of potential Coastal Change Management Areas
- Recommend that SMPs be 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.

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:

[Future Wales - The National Plan 2040](#) (2021). Future Wales is the National Development Framework for Wales.

[Planning Policy Wales](#) (2021)

[Technical Advice Note 14](#) – Coastal Planning (1998) (to be withdrawn and merged with TAN 15 later in 2021).

[Technical Advice Note 15](#) – Development and Flood Risk (2004) (to be withdrawn and merged with TAN 14 later in 2021).

[Coastal Change Management Areas Methodology Background Paper](#) Pembrokeshire Coast National Park Authority, January 2018

[Coastal Change Adaption Planning Guidance](#) (East Riding of Yorkshire Council, Halcrow 2015). Provides 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.

[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.

10 Responding to change

This section discusses approaches to responding to coastal change, including the development of coastal adaptation plans to support the process of responding to change 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 continue to defend. This relates to third-party defences as much as to defences managed by RMAs.

Typically, the need to manage change is the outcome of Managed Realignment or No Active Intervention policies. However, even where an SMP defines a long-term policy of Hold the Line, there may be a need for ongoing planning for change (for example, in response to increasing flood risk or from beach loss).

The National Strategy has a section on coastal adaptation under its Objective D 'Preventing more people becoming exposed to risk', as introduced and signposted in **Section 2**. This refers explicitly to the need for responding to coastal change.

As part of this response, the National Strategy highlights the following:

- RMAs and private asset owners should consider how infrastructure can be adapted to higher sea levels before the risk becomes excessive. Similarly, RMAs should consider how to implement a change in coastal management long before the SMP indicates it. The National Strategy's Measure 18 states that Welsh Government will work with the Coastal Groups and NRW to develop further guidance on coastal adaptation by 2022. This is very important context for this section of the guidance.
- In addition, a key priority of the National Strategy is to deliver more natural interventions and catchment approaches to help improve environmental, social and economic resilience, and this needs to be considered in relation to the driver for change (relating to the discussion in **Section 5**) and more directly to the response to change.

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. Within this section of the Supplementary Guidance, the term 'Responding to change' is used more specifically to capture the need for some response other than defence management.

10.2 Available guidance

There is currently no dedicated policy or guidance framework to support the practical delivery of responding to change at the coast. The National Strategy does clearly identify that *'We cannot defend our entire coastline. There will be instances where it becomes unsustainable or counter-productive to maintain some defences in their present position'*, reinforcing the SMP principle that *'SMP policies should take account of the relationships with other defences, developments and processes, and avoid committing future generations to inflexible and expensive options for defence'*.

However, the Auditor General for Wales report *Coastal Flood and Erosion Risk Management in Wales* (2016) identified that 'RMAs were finding it difficult to plan and engage with local communities without Welsh Government offering some clear

strategic options for communities facing managed retreat. In the absence of a clear national strategic lead on managed retreat, some councils are funding community engagement activities to develop change management plans without a realistic picture of the options available and their legal and financial implications’.

As set out in the National Strategy (Measure 18), Welsh Government aims to work with the Coastal Groups and NRW to develop further guidance on coastal adaptation by 2022. It is anticipated that this guidance will collate existing experience and examples of where adaptation planning is being progressed, although it is uncertain to what degree this may address the more strategic issues identified.

The identified issues are compounded by the fact that each area or situation is different. This is highlighted in one of the key conclusions from Defra’s Coastal Change Pathfinder Projects in England 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.

The English Coastal Change Adaptation Pathfinders undertaken in 2010–11 explored and trialled some of the practical, planning and engagement techniques and considerations and may provide useful broader guidance relevant to Wales. However, in both England and Wales, 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.

To a degree, broader implications of coastal change are considered through planning policy, as discussed in **Section 9**.

10.3 Informing this process

Whilst the development of formal guidance is still emerging, certain issues have been highlighted that should be considered in responding to change.

10.3.1 Five ways of working

The Well-being of Future Generations (Wales) Act introduces ‘five ways of working’, and the National Strategy encourages using these in FCERM. They can form a useful framework when considering responding to coastal change:

- Consider the long-term climate change predictions.
- Prevent risk getting worse.
- Take a collaborative approach.
- Involve others in the delivery and success of interventions.
- Given the need to make best use of resource, acknowledge the importance of integration and regional working, which can aid delivery of core functions.

There is important emphasis on taking a **long-term perspective**. The National Strategy notes that adaptation planning should take into account the timing of the proposed action. Acting too soon can risk disruption in communities at risk, but acting too late risks greater impacts in those areas. Providing clear information and evidence is key so that residents and businesses are aware of potential future impacts that may affect them. Information and evidence enable residents and businesses to become involved in the long-term planning through which decisions are made that may bring change to their coastline and community. This is discussed in **Sections 6** and **14** from the perspective of ‘getting ahead of the game’.

A collaborative approach that involves communities and other stakeholders in decision making can be resource-intensive; this needs to be considered further at a national scale. However, an initial step is to identify where the SMP is highlighting the need for response to change. This allows resources to be prioritised whilst issues are raised with communities and other stakeholders in an appropriate and timely manner.

Good examples of adaptative planning are the [recent study undertaken by Network Rail](#) and the work undertaken by Local Authorities such as by Gwynedd Council.

In terms of future planning, the Health Checks have identified that, whilst some FCERM schemes or strategies recognise the longer-term need for change, the focus has been primarily on addressing the more immediate FCERM needs over the medium term. Response to change often needs to consider actions beyond this medium-term timescale, being considered as an ongoing process of adaptation, addressing the question of 'what next'.

In all this, further emphasis is placed on collaboration and integration. In taking forward coastal adaptation planning, there is a clear need for an inclusive attitude, recognising that response may be required across different agencies, alongside the need for agreed actions from within communities and with key stakeholders. This requires a long-sighted perspective, gaining institutional buy-in and ensuring that conflicts between the policies and plans of various public bodies on what are ostensibly unrelated matters are, so far as possible, avoided.

10.3.2 Coastal adaptation plans

A finding of the Health Checks is the need for coastal adaptation plans to support the process of responding to change. This may need to be applied in different ways in relation to areas where more major change or relocation is required, through to modifying coastal use in response to coastal change (such as in Hold the Line areas) or in relation to advice to third-party defences.

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

- Why a coastal adaptation plan is needed. This could be due to increasing risk, lack of funding, avoidance of impact or opportunity for enhancement or legislative requirement. This relates to, and is discussed in, **Section 5** with respect to policy clarity (that is, SMP management intent).
- What is the proposed response. This could be to reduce risk, increase resilience, avoid impact, create opportunity or 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. This relates to, and is discussed in, **Section 6** with respect to triggers for change of SMP management intent.
- How the response to coastal change may affect the natural environment. The coastal adaptation plans may require formal assessments; advice on such requirements can be obtained from NRW. In any case, in line with the Principles of Sustainable Management of Natural Resources, there is a need for a positive integrated approach.

10.3.3 Role of the Coastal Groups

The National Strategy sets out the role of the Coastal Groups as being responsible for producing, implementing and monitoring progress of the SMPs. The Coastal Groups will steer, support and prioritise adaptation plans at an SMP level. However, adaptation plans should be jointly developed by RMAs with responsibilities for the section of coast where there is a change to a No Active Intervention or Managed Realignment policy, as they are likely to include specifics that would require corporate approval, political input, community engagement and funding, for example. As such, the SMP process does have a key role in identifying and communicating where this need exists.

The Coastal Groups should have a major role in coordinating and enabling a suitable inclusive approach. It is recommended that Coastal Groups should review their Terms of Reference, encouraging the Groups to act more as a lobby group in discussion with PSBs, Planning Authorities, decision makers and elected members, revitalising political support and progressing collaborative work on the topic.

This is discussed in **Section 4.2.2** with reference to the governance of the Refresh process.

10.3.4 Stakeholder engagement

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. SMPs are the starting point, as they trigger 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. Collaboration with stakeholders at this early stage can identify opportunities whereby the aims of the SMP could, in some instances, support the delivery of other stakeholders' project ambitions. This could be particularly relevant when considered in the context of the SMNR approach set out in the Environment (Wales) Act 2016.

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

There is available guidance on good stakeholder engagement practices. In Wales, key reports and websites are as follows:

- [SPSF 10 WFG Act Statutory Guidance](#)
- [Pembrokeshire Coastal Forum - Coastal Communities Adapting Together](#) (CCAT)

Whilst UK-wide reports include the following:

- 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 coastal adaptation 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 Check findings and in ongoing shoreline management planning to facilitate site condition improvement and maintenance 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. The following protected sites are considered:

- Designated and candidate Special Areas of Conservation (SACs)
- Classified and potential Special Protection Areas (SPAs)
- Ramsar sites
- Sites of Special Scientific Interest (SSSI)
- MCZs

SMPs must also take into account landscape and historic environment protected sites, as set out in the 2006 SMP guidance. These, together with other environmental drivers such as net benefit for biodiversity, sustainability of natural resources, and ecosystem resilience, are therefore considered in **Section 11.3**.

11.2 Changes in guidance or legislation

11.2.1 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 an HRA (Regulation 63(1)). These provisions also apply to marine SPAs and SACs, and to Ramsar sites.

Guidance on undertaking HRAs has been updated since the SMPs, with recent guidance available from the Ministry of Housing, Communities and Local Government (2019), which includes advice on case law. Other representative guidance is also available, such as *Planning for the Protection of European Sites: Appropriate Assessment* (DCLG 2006), TAN 5 – Nature Conservation Planning (WAG 2009), 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 through [DTA Publications](#).

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

- Conservation of Habitats and Species Regulations 2017, as amended (note that from January 2021, the 2017 Regulations will remain operable through the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019).

- Conservation of Offshore Marine Habitats and Species Regulations 2017, as amended.
- Wildlife and Countryside Act 1981, as amended.

In addition, since the SMPs were produced, a MCZ has been designated at Skomer, and additional MCZs are expected to be designated in the future.

11.2.2 Changes in 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 clarification from *Welsh Government clarification note on the current relationship between the Habitats Directive, the Shoreline Management Plans and the National Habitat Creation Programme* (Welsh Government 2018a), the National Strategy (Welsh Government 2020) and PPW (Welsh Government 2021) reinforce the approaches that were carried out by the SMPs.

New national strategies and initiatives will have a bearing on future consideration of protected sites. **Section 2** discusses the relationship of SMPs to the National Strategy, which also encompasses and references relevant parts of other important policy documents, such as the *Prosperity for all: A Climate conscious Wales* (Welsh Government 2019c) and other legislation.

It is also noted that the introduction of the Environment (Wales) Act 2016 reinforces the requirement to maintain and enhance biodiversity in order to promote ecosystem resilience. This influences the drive for maintaining (or restoring) natural systems rather than imposing ecosystem ‘management’. These approaches will influence any policy change (as part of the SMP Refresh process or ongoing thereafter).

Within the WNMP (Welsh Government 2019a) Objective 10 is to ‘Protect, conserve, restore and enhance marine biodiversity to halt and reverse its decline including supporting the development and functioning of a well-managed and ecologically coherent network of Marine Protected Areas (MPAs) and resilient populations of representative, rare and vulnerable species’. This should be taken into account when changes in SMP policy are identified (as part of the SMP Refresh process or ongoing thereafter).

Welsh Government have published the *Flood and Coastal Erosion Risk Management (FCERM) projects and the National Habitat Creation Programme* (Welsh Government 2018a), and a *Clarification note on the current relationship between the Habitats Directive, the Shoreline Management Plans and the National Habitat Creation Programme* (2018b). These notes clarify the requirement for appropriate assessment of the SMPs and any subsequent plans or projects. It confirms that if a project is consistent with the SMP policy, the justification for no alternative solutions and IROPI set out in the SMP HRA and Statement of Case could inform the statutory notice. It also clarified that compensatory habitat associated with Local Authority or NRW projects would be delivered through the NHCP. Of note is that Welsh Government do not consider coastal squeeze as a result of SLR and the presence of a historic defence to be considered as habitat loss under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, because it is not related to a physical intervention (plan or project). However, for projects that predate the Habitats Directive (such as historic structures), member states nevertheless have a legal duty to take appropriate steps to avoid deterioration of habitats. If the defence structure is causing such deterioration through coastal squeeze, then it may not be consistent with Article 6(2) of the Habitats Directive.

11.2.3 New case law

New case law has emerged since the SMPs, specifically Court of Justice of the European Union 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), which have a direct impact on HRAs.

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 such as regulation 68.

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 by advice from NRW. The implications of these rulings will need to be taken into consideration when existing SMP policies are taken forward to implementation through coastal strategies or projects and if the SMP Refresh process results in a change in any SMP policy.

Specifically, for HRAs scrutinised in relation to SMP changes or produced to support strategies or 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).

11.2.4 Compensatory sites

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

- Potential SPAs and possible SACs
- Listed or proposed Ramsar sites
- Sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential SPAs, possible SACs, and listed or proposed Ramsar sites

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 these sites, using findings from the SMP Health Check reports and through advice from NRW.

11.2.5 Changes to designations

Some protected sites have been amended or extended since adoption of the SMPs, and new sites designated. However, the changes are limited and are unlikely to affect the SMPs or their HRAs.

In general, changes to designations will not automatically warrant a review of SMP policy. However, 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 related to a site that was not considered during the development of the SMP). This could trigger a need to revisit the SMP policy itself, which could lead to a formal policy change.

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.

11.2.6 Delivering statutory environmental requirements

In a number of locations, protected sites affect the implementation of SMP policy; for example, in some locations, implementation of a Hold the Line policy relies on the provision of compensatory habitat, and this was addressed in each SMP HRA. The Health Checks have identified some policy units where policy delivery, or lack of policy delivery, has been identified as an issue in relation to protected sites and recommend actions to address this.

Where loss of intertidal habitat was predicted, leading to a requirement for compensatory habitat creation as a result of SMP implementation, SLR 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, outlining 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, it does recommend that in reviewing SMP policy, future climate change be appropriately considered as part of the process. This may affect determinations of compensatory habitat associated with any change in policy and may therefore affect policy decisions across a wider area. Evidence from the NHCP supporting significant changes to projections of habitat loss across protected sites may also affect SMP policy decisions.

11.2.7 National Habitat Creation Programme

Welsh Government's NHCP, managed by NRW, provides strategic habitat offset for RMAs in respect to coastal squeeze impacts. This relates specifically to compensating for impacts from coastal plans and projects within Hold the Line policy areas. Private asset owners (such as Network Rail) are not eligible to use NHCP for provision of compensatory habitat except under strict exceptional circumstances (such as invitation to bank habitat through commuted payment into a Managed Realignment scheme within an area that involves their assets).

The NHCP should inform, and be informed by, ongoing shoreline management planning. As such, any review of SMP policy should also account for changes in evidence, and this should subsequently be taken into the HRA update or revision if required.

11.3 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.

11.3.1 International sites

HRA refers to the several distinct stages of assessment that must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017, whose provisions remain operable under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (from January 2021), to determine whether a plan or project may affect the protected features of a European site before deciding to undertake, permit or authorise it.

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 may be required, on advice from NRW. This 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 affect habitats remote from the policy unit or units.

Where the Health Checks recommend revisiting SMP policy for a number of policy units, these units should be considered together, as there may be additional 'in combination' effects.

Once it has been determined that consideration of European sites or European Protected Species is required, the staged HRA approach should be followed in line with the latest guidance (Table 11-1), with further consultation with NRW 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 the new MCZ and any further MCZs that are subsequently designated after this guidance is published and the SMP policies.

A proportionate approach is recommended, which should consider whether a limited update focussed 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, because of new or amended designations, further information or changes in site condition. Early consultation with NRW 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.

Table 11-1. Stages in the HRA process in relation to SMP policy change.

HRA Stage	Description of HRA Stage
Stage 1: Screening	Confirms whether the plan is connected with the management or maintenance of the relevant European sites; identifies whether a formal change in SMP policy is likely to have a significant effect on an international or European site, either alone or in combination with other projects or plans.
Stage 2: Appropriate Assessment	Assesses whether any significant impacts of the proposed change identified in stage 1 will result in adverse effect on the integrity of any sites with respect to the site's conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts within the site boundary.
Stage 3: Assessment of alternative solutions	Assessment of alternative solutions — the process that examines alternative ways of achieving the objectives (that prompted the proposal to change SMP policy) that avoid adverse impacts on the integrity of the international or European site. Such alternative solutions may involve revisiting SMP policies elsewhere or revising the SMP policy change proposal.
Stage 4: IROPI	In the absence of alternative solutions, and where Imperative Reasons of Overriding Public Interest can be demonstrated, a project can proceed in spite of its negative effects, subject to the provision of compensatory measures and with the approval of Welsh Ministers.

The assessment should clearly identify the potential impacts of all policies being considered, where the assessment is driven by an intended policy change, as a change in policy will require full consideration of the No Active Intervention (as well as Hold the Line or Advance the Line policies) for the relevant policy unit or units. The assessments should seek to clearly quantify the habitats and species affected in order to provide the likely habitat and species compensation to be covered by the NHCP, if required (following a conclusion of adverse effect on the integrity of a site).

Where derogation is required, as well as the consideration of the alternative solutions, there must be a clear discussion of the IROPI case, in line with the current guidance.

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 that may have conflicting objectives. The advice of NRW 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 NHCP to inform compensatory habitat requirements.

The latest mapping and information on international designated sites is available from [NRW's guidance on how to find protected areas of land and sea](#) and [Lle](#) (shortly to be replaced by [DataMapWales](#)).

11.3.2 Sites of Special Scientific Interest

Since the SMPs were produced, there have been updates and 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.

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 (**Section 4.3**) so that the policy change does not lead to a conflict with the management objectives of the designated site. Many SSSIs underpin a SAC or SPA, and this exercise would be captured within the procedure described in **Section 11.3.1**, 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 SSSI conservation and enhancement. SMPs should therefore aim to support SSSI restoration to favourable or recovering condition, where possible. Early consultation with NRW as part of the policy review process is recommended to help identify such opportunities.

In addition to the resources identified for international sites, for SSSI, [*NRW's guidance on how to find protected areas of land and sea*](#) should be used to find out about the activities that are likely to damage a specific site.

11.3.3 Marine Conservation Zones

Where changes in SMP policy are identified (as part of the SMP Refresh process or ongoing thereafter), regard will need to be given to all WNMP (Welsh Government 2019a) policies, notably SOC_08 and SOC_09, plus ENV_02 on MPAs. This will require a bespoke assessment of any new MCZs that result from the Welsh MPA Network Completion project (currently ongoing).

Although the assessment process for MCZs under the ENV_02 policy is not yet finalised, it is expected that the SMP policy change assessment will be a relatively light-touch process, based on knowledge of the features and management objectives of the MCZ and any changes proposed in shoreline management policy.

11.3.4 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 (**Section 4.3**).

The existing SMP SEA 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 11-2 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, such as The Practical Guide to the Strategic Environmental Assessment Directive (ODPM 2005).

Table 11-2. Consideration of other protected sites and areas

Sites	Latest guidance	Retrospective SMP review required?	Assessment required where changes in SMP policy identified
National Nature Reserves	Government policy is set out on the National Nature Reserves webpage .	No – all National Nature Reserves are already notified as SSSI	Explained in Section 11.3.2.
Nationally protected historic buildings and sites	PPW (Welsh Government 2021).	No – latest policy does not change approach adopted in SMPs.	<p>Identify any new, or changes to, designations, including new World Heritage Sites (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 Cadw and the Royal Commission on the Ancient and Historic Monuments of Wales.</p> <p>Refer to:</p> <ul style="list-style-type: none"> • Lle (to be replaced by DataMapWales) • Cadw's advice on Scheduled Monuments • Royal Commission on the Ancient and Historical Monument of Wales database
National Parks	There are two National Parks with coastal frontages, namely, Pembrokeshire Coast National Park and Snowdonia National Park. The relevant local development plans are available on Pembrokeshire Coast National Park and Snowdonia National Park websites.	No – position statements do not change approach adopted in SMPs. National Park local plans are reviewed every 5 years, so they should account for SMP.	<p>Consider current National Park objectives.</p> <p>Consult with Pembrokeshire Coast National Park Authority and Snowdonia National Park Authority.</p> <p>Refer to:</p> <ul style="list-style-type: none"> • Pembrokeshire Coast National Park website. • Snowdonia National Park website
Areas of Outstanding Natural Beauty	No national policy changes.	No – Areas of Outstanding Natural Beauty	Consider current Areas of Outstanding Natural Beauty objectives.

Sites	Latest guidance	Retrospective SMP review required?	Assessment required where changes in SMP policy identified
	Work has been ongoing on 70 nature recovery solutions relating to Areas of Outstanding Natural Beauty (The National Association Areas of Outstanding Natural Beauty 2020), four are in Wales.	management plans are reviewed every 5 years, so they should account for SMP.	<p>Consider any nature recovery sites that could be affected.</p> <p>Consult with the relevant Areas of Outstanding Natural Beauty partnership, but note that the relevant Local Authority remains responsible for making decisions on proposals.</p> <p>Refer to:</p> <ul style="list-style-type: none"> • Lle (to be replaced by DataMapWales)

11.3.5 Other environmental drivers

National policy

SMNR, building ecosystem resilience, and focussing on nature-based solutions are all approaches supported in the PPW (Welsh Government 2021) and the WNMP (Welsh Government 2019a), as well as other recent legislation, such as the Environment (Wales) Act 2016 and the Well-being of Future Generations (Wales) Act 2015.

The WNMP (Policy ENV_01) aims to ensure '[that biological and geological components of] ecosystems are maintained, restored when needed and enhanced where possible, to increase the resilience of marine ecosystems and the benefits they provide'. Under the Environment (Wales) Act 2016, there are nine principles of SMNR:

- 1) Adaptive management
- 2) Scale
- 3) Collaboration and engagement
- 4) Public participation
- 5) Evidence
- 6) Multiple benefits
- 7) Long term
- 8) Preventative action
- 9) Building resilience

SMPs were developed in line with many of these principles and are therefore already aligned to the requirements of the Environment (Wales) Act, setting out the most sustainable options for coastal management in the long term.

The Environment (Wales) Act also promotes a place-based approach; as a result, NRW has published seven area statements that aim to implement the priorities in the Natural Resources Policy. All six terrestrial area statements share a coastal boundary with the Marine Area Statement, further promoting the need for integration at the coast. One of the themes in the Marine Area Statement is Nature-based solutions and adaptation at the coast, which supports SMP implementation. Where Managed

Realignment and No Active Intervention policies are implemented, there are opportunities to restore habitats and improve ecosystem resilience. In addition, where the policy is Hold the Line, a range of nature-based solutions can be considered to maximise biodiversity benefits and other ecosystem services.

Welsh Government's ambition is for more nature-based solutions to deliver wider benefits, including restoring nature, and the push for net benefit for biodiversity and ecosystem services resilience through the WNMP and PPW.

It is important to note that addressing impacts to international and national protected nature conservation sites cannot be considered as part of the net benefit for biodiversity consideration. However, it is recommended that opportunities for local scale restoration and enhancement should be considered to enhance and connect legally protected sites with net benefit for biodiversity initiatives.

Carbon storage and sequestration opportunities

Welsh Government have a legal binding commitment to achieve net zero greenhouse gas emissions by 2050. This will involve both reducing the environmental impact of human activities and introducing measures to offset the release of carbon.

The recent Evidence Report by NRW (ABPmer 2020) has highlighted the importance of Welsh marine ecosystems as a store of 'blue carbon'. There is an opportunity to further improve the sequestration potential of the marine environment through policy implementation (or policy change) that creates, restores or enhances coastal blue carbon habitats. Many coastal blue carbon habitats are already protected sites, but management of these areas through SMP policy implementation should aim to increase the resilience of habitats to future change and protect and enhance quality of habitats. Restoration of habitats that have been affected by human activities may also increase the amount of carbon they can store.

Local authorities, the NRW and Welsh Government are also working to reduce the carbon and environmental impact from the construction and operation of flood and coastal defences. The Environment Agency has developed a Carbon Modelling Tool, which provides a top-down whole-life carbon assessment and optioneering approach, but there is currently no specific guidance on how carbon impacts should be addressed at a strategic level.

Opportunities to both offset and reduce environmental impact will primarily be through SMP policy implementation. But where changes in SMP policy are identified (as part of the SMP Refresh process or ongoing thereafter), consideration of opportunities to improve carbon storage and sequestration should form an integral part of the evidence gathering process (**Section 4.3**). This will involve working closely with the NHCP.

Strategic assessments of mitigation and offsetting opportunities at the coast should also form an important input to the carbon metrics of RMAs as they develop their approach to achieving net zero.

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), the WNMP (Welsh Government 2019a) and LFRMS, and the assessments to be carried out wherever a change in SMP management policy is proposed.

12.1 Background

RBMPs, FRMPs, the WNMP (Welsh Government 2019a) and LFRMS address aspects that are strongly related to the scope of SMPs. Coordination between these plans and the SMP is needed so that they are not contradictory, and ideally that they are complementary and embedded as part of ways of working.

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

- RBMPs were first published in Wales in 2009 after the 2006 SMP guidance was published and after many of the second-generation SMPs were produced. Draft revised Plans for the two River Basin Districts in Wales for Cycle 2 were published at the end of 2020, with final plans to be published by 22 December 2021. The current relationship is largely how SMPs inform RBMPs of shoreline management policies and actions, and in particular, the implications of these on the environmental objectives in Article 4.1 of the WFD (now 'Water Environment [Water Framework Directive] [England and Wales] Regulations 2017') through SMP-specific WFD assessments. It is also how those actions can contribute towards achieving good status and preventing deterioration.
- The first cycle of FRMPs was developed after the current SMPs. NRW developed the national scale FRMP, which includes coastal flood risk. This document refers to the SMP, stating that the SMPs remain in place, and it includes the most relevant of the SMP actions in its list of measures. The second FRMP cycle is being prepared. NRW will again develop a national scale FRMP that will refer to the SMPs, both at a general level and in relation to specific measures. NRW expects that any FRMP-specific coastal content will be compatible with the SMPs. Consequently, it was identified that there is no need for guidance about the relationship between SMPs and FRMPs.
- The WNMP was published in 2019, which is after the current SMPs. The Marine Plan makes reference to SMPs through its policies relating to seascapes (SOC_07), resilience to coastal change and flooding (SOC_08) and the effects on coastal change and flooding (SOC_09). It is very much aligned with the broad principles of the SMPs.
- LFRMS are statutory documents that set out how councils propose to manage flood risk in their areas. Whilst they primarily focus on local sources of flooding, they also set out the local authorities' role in coastal flood and erosion risk management. They were developed after the current SMPs, and for coastal matters, they typically refer to, and are based on, the SMPs.

An overall retrospective review of the effect of the existing SMP policies on RBMPs, FRMPs, the WNMP or LFRMS is not required, as these other plans had full cognisance of the SMP when they were being developed. Rather, the implications of, or potential effects on, the objectives within these other plans need to be considered 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 following sections consider the relationship between SMPs and RBMPs (**Section 12.2**), between SMPs and the Marine Plan (**Section 12.3**) and between SMPs and LFRMS (**Section 12.4**).

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 for the following:

- Improve awareness of WER issues and integration between SMPs and RBMPs
- Assess the implications of any changes in SMP policy on RBMPs through a review and update of the SMP's existing 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 RBMPs can be gained by reviewing the following documents:

- [*The Cycle 2 RBMPs for Western Wales and the Dee*](#) (2015 – 2021).
- [*Statutory guidance on the implementation of the Water Environment*](#) (Water Framework Directive) (England and Wales) Regulations 2017.

Improved integration between SMPs and RBMPs can be achieved by individual(s) locally involved in RBMP Cycle 3 becoming actively involved in the relevant Coastal Group. RBMPs for Cycle 3 will be published in 2022.

NRW's close involvement in both SMPs and RBMPs provides opportunities for this, and so does the emerging initiative of 'Opportunity Catchments', which aims to explore and facilitate integrated improvements to water quality and other aspects such as shoreline management. This may best be achieved through [*Water Watch Wales*](#), [*DataMapWales*](#) and the NRW Area teams who lead on water quality.

This will help achieve the following:

- Awareness and understanding of WER issues are improved.
- RBMP Cycle 3 objectives are known and shared.
- Changes in SMP policies (arising from the SMP Refresh process or ongoing thereafter) are proven to be WER compliant.
- Changes in SMP policies (arising from the SMP Refresh process or ongoing thereafter) are delivering WER enhancement opportunities where possible (such as 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 review and update to the SMP WFD assessment will be required as part of the overall SMP policy review process (**Section 4.3**) so that the policy change does not lead to a deterioration in Water Body status.

Although there is no legal driver for this assessment, it is considered good practice and builds on the work already undertaken to develop the SMP. This assessment will be a relatively light-touch process. It is effectively updating previous SMP-level WFD assessments in accordance with existing guidance: Water Framework Directive: Guidance for Assessment of SMPs under WFD (Royal HaskoningDHV 2009) developed for the Environment Agency and based on 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 WER. 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 insofar as they are relevant to SMP policy delivery. The RBMPs from the 2015 cycle are available on [NRW's website](#). The RBMPs for Cycle 3 will also be made available on the NRW website once they have been finalised.

12.3 Welsh National Marine Plan

12.3.1 Addressing findings from the Health Checks

The Health Checks raised no issues with existing relationships between the SMP and marine planning through the WNMP (Welsh Government 2019a) or with marine plans for adjacent marine planning regions: North West and South West Marine Plans in England, and the National Marine Planning Framework in Wales. However, this may be in part due to the need to improve understanding of the implications of the SMP for Marine Plan policies and overarching objectives. A key recommendation is therefore to improve awareness of the first WNMP and the policies therein, and its supporting materials. This is discussed further in **Section 12.3.2**.

The WNMP was developed after the SMPs and contains clear links with the SMPs. Therefore, a broad-scale retrospective assessment of the effect of existing SMP policies on the WNMP is not required.

12.3.2 Improving awareness

The first WNMP was published in November 2019 (Welsh Government 2019a). This Refresh presents an opportunity to raise awareness of the plan and its policies (specifically SOC_07, SOC_08 and SOC_09 as introduced in **Section 12.1**) with those delivering SMP policies.

The WNMP recognises the SMPs alongside Welsh Government's National FCERM Strategy (paragraph 141 of the WNMP) and includes the following policies under coastal change and flooding:

- SOC_08 Resilient to coastal change and flooding: Proposals should demonstrate how they are resilient to coastal change and flooding over their lifetime.
- SOC_09: Effects on coastal change and flooding: Proposals should demonstrate how they avoid significant adverse impacts upon coastal processes and minimise the risk of coastal change and flooding. Proposals that align with the relevant Shoreline Management Plan(s) and its policies are encouraged.

Resources include:

- [Welsh National Marine Plan](#) (Welsh Government 2019a)
- [Welsh National Marine Plan Implementation Guidance](#) (Welsh Government 2020)
- [Marine Planning in Wales web page](#)
- [UK Marine Policy Statement](#) (HM Government 2011).

12.3.3 Assessing SMP policy changes

Where changes in SMP policy are identified (as part of the SMP Refresh process or ongoing thereafter), regard should be given to all WNMP policies as part of the overall SMP policy review process (**Section 4.3**). The SMP policy change assessment can be a relatively light-touch process.

12.4 Local Flood Risk Management Strategies

12.4.1 Addressing findings from the Health Checks

The Health Checks raised no issues with existing relationships between the SMP and LFRMS. Notwithstanding that, there may still be a need to improve awareness between the groups managing both plans, and integration between the plans themselves.

12.4.2 Improving awareness and integration

SMPs and their Action Plans have long suffered from a lack of prioritisation and integration in work programmes and other FCERM activities. The non-statutory status of SMPs also makes it difficult to seek corporate support and diversion of resources to support their delivery. LFRMSs should therefore offer the necessary statutory framework to include and embed SMPs and their Action Plans in the measures set out in LFRMS.

LFRMS set out how councils propose to manage flood risk in their areas, and whilst their primary focus is on local sources of flood risk, as defined in the Flood and Water Management Act 2010, the updated LFRMS will require councils to set out all activities and measures to manage risks, including an Action Plan in lieu of a Flood Risk Management Plan.

LFRMS should transpose councils' commitment to their communities and should therefore be used by Flood Lead Officers to justify and secure adequate resources and funding to deliver measures and Action Plans; this offers a prime opportunity to embed SMPs and give the SMP Action Plan a stronger statutory footing.

12.4.3 Assessing SMP policy changes

Where changes in SMP policy are identified (as part of the SMP Refresh process or ongoing thereafter), a bespoke assessment against the relevant LFRMS measures and actions will be required as part of the overall SMP policy review process (**Section 4.3**), so that the policy change does not lead to a conflict with the local authorities' flood risk management objectives.

This will be a relatively light-touch process, based on engagement with appropriate Local Authority representatives. In some cases, the appropriate people may already be involved directly in the SMP process.

PART THREE – MAINTENANCE

Part Three comprises the following:

Section 13	SMP Status Tracker	91
Section 14	Action Plans	94

13 SMP Status Tracker

13.1 Introduction

This section sets out a simple, low-maintenance template that might be considered for recording and communicating the current SMP status. The template could be used to record the subcategories applied to each policy unit to improve policy clarity (**Section 5**) and any changes made to the SMP. It may also assist the Coastal Groups in delivering Measure 11 of the National Strategy to report on the implementation of SMP epoch 1 policies through the WCGF to Welsh Government by 2025

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, which 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 underway that might have a bearing on SMP policy in the future.

13.3 Structure

The SMP Status Tracker has two main components:

- 1) Policy details, conveying the subcategories and statements of management intent.
- 2) Status information, summarising details of any changes or policy reviews.

Table 13-1 presents the template, including illustrative samples of the information to be included. A spreadsheet version of this is available from NRW and the WCGF.

13.3.1 Policy details

It is recommended that the SMP policy details be provided as described in **Section 5 Policy clarity**, with subcategories 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, which 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 trigger setting (**Section 6**).

13.3.2 Maintaining the status

Changes to the SMP

The Health Checks have established that there are locations where the current implementation approach differs from the policy set out in the SMP. This is not recorded anywhere. There are also several locations where SMP policy may be revisited as a result of the Health Check findings. For greater and common awareness of those changes, and in future where sections of the SMP are 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.

Policy-related activity

In addition to any changes that may be 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 without providing extensive detail. Table 13-1 provides an example of the Status Tracker.

Table 13-1. SMP Status Tracker (filled in with example text)

Policy Unit		SMP Management Policy				Status				
ID	Name	Stage	Policy	Subcategory	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 Health Check	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 Managed Realignment to Hold the Line (add hyperlink)	2016	No	-	-
		Intermediate	-	-						
		Target	Hold The Line	Maintain / Replace						
1.3	C to D	Present	No Active Intervention	Local Activity Only	Limited works to existing structures at slipways, beach access points and private properties might be accepted, subject to obtaining the necessary consents, licences and approvals.	Policy boundary (PU1.2/PU1.3) amended (add 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 (add 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 Health Check	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 new Action Plan format has been developed, which the WCGF could consider for future application. The template for this new format is available from NRW and WCGF and is illustrated in **Table 14-1**.

The updated Action Plan format would still enable consistency at the highest level across all SMPs, but would also allow flexibility so that each Coastal Group can include additional detail if required. To achieve this, the updated Action Plan format uses a two-tab hierarchy system:

- **Summary Action Plan** (refer also to **Table 14-1** as a guide): This is a simplified view of the actions. It only shows a limited number of columns that hold information considered vital for SMP policy progression, communication to stakeholders and could be used for upward reporting annually to Welsh Government via the Wales Coastal Group Forum (as required by Measure 10 of the National Strategy). This tab automatically pulls through the information entered into the matching columns of the 'Detailed Action Plan' tab. The Summary Action Plan tab only shows strategic actions affecting SMP policy.
- **Detailed Action Plan** (refer also to **Table 14-2** as a guide): This tab contains more detail on the actions. It can be used by the Coastal Groups to capture as much information as they require to facilitate implementation of the actions. The example template includes categories that have been requested by different groups, but several fields are optional. Additional columns can also be inserted by the Coastal Group to capture further detail if they wish.

Detailed instructions on how to populate and use the Action Plan are provided in the example 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 nonstrategic actions, such as day-to-day operational and routine management actions, be recorded separately outside the SMP Action Plan.

There is a risk that if nonstrategic 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 nonstrategic actions into the same plan. For this reason, the template includes a 'strategic or non-strategic?' column. All routine and 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.

Full definitions of strategic and non-strategic in the context of the SMP Action Plan are provided within the template.

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 it 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:

- The plan should remain focussed on 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 (**Section 3.5**).
- It is important nonetheless to look beyond that immediate timeframe so that 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 (**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, which 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-year horizon, then it is recommended that they be 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 could use the new template 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) for proactive shoreline management planning and compliance with Measure 10 of the National Strategy. As the Action Plan is 'rolled forward', new actions should be added as they are identified, including those from studies, strategies or plans as they are completed. In this way, the Action Plan remains a 'live' document. However, simply copying those additional actions into the SMP Action Plan without due consideration is not recommended. It is possible that many of those actions might be specific to the study requirements or be at a level of detail that 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 confirm the correct version is being used and shared. This should always be recorded in the first tab of the Action Plan whenever a major update is made.

14.4.3 Responsibilities

For Action Plan ownership, the ultimate responsibility for these updates and for general management of the Action Plan should lie with one person, ideally the Coastal Group Chair 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 Action Plan updates where possible. Regular meetings, at least annually, are recommended and should involve all parties to allow open discussion and agreement. It is recommended that this include engaging the WCMC where monitoring is a key component of the actions identified for SMP delivery.

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

Table 14-1. Summary Action Plan

Location in Terms of SMP			Reference numbers	Action description and categorisation			Delivery	Timings and progress tracking				
SMP Number	Policy Unit ID	Policy Unit Name (location)	Overall unique reference number (parent + child)	Action Description	Strategic or Non-strategic	Action theme	Action lead organisation	Trigger for initiation	Start date	Completion date	Action progress status	Action status commentary
<i>Use dropdown list</i>	<i>Use dropdown list</i>	<i>Freeform text</i>	<i>Auto fills by combining parent and child number</i>	<i>Freeform text</i>	<i>A locked filter could be used so only strategic actions appear in this tab</i>	<i>Use dropdown list</i>	<i>Freeform text</i>	<i>Freeform text</i>	<i>Freeform text</i>	<i>Freeform text</i>	<i>Use dropdown list</i>	<i>Freeform text</i>
Prioritisation and delivery risks							Costs	After completion				
Priority score		Potential dependencies			Enabling actions		Estimated cost of action	Outcomes		Changes to SMP required?		
<i>Auto fills with output of risk matrix</i>		<i>Freeform text</i>			<i>Freeform text</i>		<i>Freeform text</i>	<i>Freeform text</i>		<i>Freeform text</i>		

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List of abbreviations

The following contains the abbreviations used throughout this guide:

Acronym	Definition
CCMA	Coastal Change Management Area
Defra	Department of Environmental, Food and Rural Affairs
FCERM	Flood and Coastal Erosion Risk Management
FRMP	Flood Risk Management Plan
HRA	Habitat Regulations Assessment
IROPI	Imperative Reasons of Overriding Public Interest
LFRMS	Local Flood Risk Management Strategy
MCZ	Marine Conservation Zone
MPA	Marine Protected Area
NHCP	National Habitat Creation Programme
NRW	Natural Resources Wales
PSB	Public service board
PPW	Planning Policy Wales
RBMP	River Basin Management Plan
RMA	Risk Management Authority
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SLR	Sea level rise
SMNR	
SMP	Shoreline Management Plan
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TAN	Technical advice note
UK	United Kingdom

Acronym	Definition
UKCP09	UK Climate Projections 2009
UKCP18	UK Climate Projections 2018
WCGF	Welsh Coastal Group Forum
WCMC	Wales Coastal Monitoring Centre
WER	Water Environment Regulations
WFD	Water Framework Directive (now replaced by Water Environment Regulations)
WNMP	Welsh National Marine Plan
WER	Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

Glossary

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

Term	Explanation
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.
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 by 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 2 of the SMP Refresh for each SMP.

Term	Explanation
Partnership Funding	Welsh Government'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. A 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	In flood risk management, the annual probability of the design flood level being reached or exceeded.
Statutory	Relates to a legal obligation.
Welsh Coastal Group Forum (WCGF)	Partnership that brings together the Chairs of the four Coastal Groups in Wales with Welsh Government, NRW, National Trust and Network Rail.