

PROMOTING AN INTEGRATED APPROACH TO MANAGEMENT OF THE COASTAL ZONE (ICZM) IN ENGLAND

THE RESPONSE TO CONSULTATION OF THE HUMBER ADVISORY GROUP

INTRODUCTION

The Humber Advisory Group (HAG) welcomes the opportunity to comment on the Defra consultation paper. The Group was established in 2001 to advise and support the Humber Estuary Relevant Authorities Group (HERAG) in the development, and now implementation, of the Humber Estuary Management Scheme, which was produced to fulfil the obligations of Regulation 34 of the Habitats Regulations 1994. The Group comprises people from business, agriculture, local communities, environmental organisations, recreation and sporting interests, economic development and academia.

HAG works closely with the organisations with statutory powers for the management of the Humber that form HERAG – local authorities, English Nature, Environment Agency, sea fisheries committees, water companies, internal drainage boards, MoD, and port and navigation authorities. The Group is represented on other Humber fora concerned with sectoral planning and management tasks such as the Environment Agency's Humber Estuary Flood Risk Management Strategy - 'Planning for the Rising Tide'. It has links with business and economic development bodies including Humber Chemical Focus, the Humber Trade Zone project, The Northern Way programme and Humber Industry Nature Conservation Association (Humber INCA), The South Humber Bank Wildlife and People Project, and with the neighbouring Coastal Forum for the East Riding of Yorkshire's Integrated Coastal Zone Management Plan.

The Humber has the UK's largest complex of ports, and a large cluster of oil refining and chemical companies on its banks. It is surrounded by high-grade farmland and there are many features of heritage importance. Settlements include the City of Hull, Cleethorpes, Goole, Grimsby, Immingham, and smaller towns and villages. The whole of the Estuary is a Site of Special Scientific Interest, much of the intertidal area is a Special Protection Area for Birds and it is in the process of being designated a Special Area for Conservation. These designations have an over-arching influence on all activities in and around the estuary, including for the preparation of the local development frameworks of the local authorities.

With the existing obligations under the Habitats Regulations and with the Water Framework Directive now being implemented, a prime concern of HAG is that ICZM does not become yet another bureaucratic planning exercise and really adds both simplification and value to the management of this vital resource for the country.

SECTION 3.4

We recognise the underlying problems highlighted by the EU Demonstration Project. Over the last six or so years much effort by the organisations with interests in the Humber has gone into addressing points a to e, although there is need for continual

improvement and the avoidance of moving backwards through complacency. In this work a project manager working with the organisations to ensure good communications and co-ordination is of vital importance. We have seen a number of such initiatives lose momentum and go into abeyance as a result of lack of funding support from some partnership members to continue to employ such a person.

SECTION 3.7

The essential objectives for the management of the coastal zone are supported. We would see ICZM being about the holistic, sustainable management – environment, society and economy – not just environmental sustainability.

SECTION 4

- 4.1 The view that there should be no ‘official’ coastal zone with its own statutory planning system is supported. A range of approaches and tools are required that can be customised to manage the diverse nature of the English coastlines in a flexible manner.
- 4.2 Likewise the concept of ICZM ‘joining up’ the management of the land and sea is good. Otherwise there is a danger that the coastal zone becomes divorced from its hinterland, as well as from maritime management.
- 4.3 The principles reported in this paragraph are supported and point towards a flexible approach that will inform and facilitate the joining up of existing statutory and sectoral plans while not imposing yet another layer of formal plans. ICZM needs to feature in regional spatial strategies so as to inform local development control.

With the number of sectoral plans for the coastal zone (eg shoreline management and flood risk management plans, heritage coast, conservation management schemes, catchment abstraction management strategies, Bathing Waters Directive, Urban Waste Water Treatment Directive, etc with river basin management plans coming along), it is not surprising that business and lay people are confused, suffer from consultation fatigue (8.4d) and apathy. The role of ICZM could be to provide a (short) over-arching description of the common objectives that inform the sectoral plans, a statement of the outcomes agreed for the particular coastal zone and a summary of the responsibilities for particular initiatives. It must, however, demonstratively ‘add value’ and not cause more confusion and duplication.

SECTION 5

In this section there is no reference to the pressures on the coastlines from ports, navigation, dredging and marinas, except in respect to pollution from vessels (5.18).

5.6 Coast Erosion and Flooding

“It will never be possible to totally prevent flooding ...”, is correct but the way it is expressed here may give an over-optimistic impression of the challenges ahead and does not recognise that some land will have to be “returned” to the sea (managed

realignment) in order to work with natural processes, achieve conservation objectives and meet cost-benefit requirements. Managed realignment is now taking place on a large scale around the Humber with the tide already returned to nearly 600ha at Alkborough, Chowder Ness, Paull Holme Strays and Welwick sites, and others being in the planning stage.

It should be noted that protection works against cliff erosion could starve the sediment supply to adjacent areas (eg the Humber estuary and Lincolnshire coast in respect to the East Yorkshire cliffs) leading to a loss of valuable intertidal habitats and natural protection for flood defences.

We also want to see rigorous control over development proposals on floodplains and areas potentially subject to erosion.

5.9 Nature Conservation

There are also the management schemes for European Marine Sites, such as the Humber, that are required by the Habitat Regulations (Regulation 34) and provide another sectoral input into the management of parts of the coastal zone. English Nature's specific 'Advice' to the relevant authorities of each European Marine Site (Regulation 33) provides over-arching guidance for the management of such an area. It provides a degree of integration and highlights the need for joint working between organisations with an interest in the site. The 'Advice' is applicable to the appraisal of proposed 'plans and projects' (local development frameworks, shoreline management plans, flood defence capital schemes, harbour works, discharge consents, etc.), as well as to the 'activities' (eg ongoing operations and maintenance), which are the specific province of the management schemes. We believe that for areas such as the Humber, where the whole estuary is a European Marine Site, the actions required to implement and comply with the Habitats Regulations go along way towards integrated coastal zone management. For this reason we remain to be convinced of the need for any further planning initiatives such as could be required by ICZM.

For information the Humber Management Scheme, which was adopted in 2005, covers the following activities: Fisheries; Flood Defence and Land Drainage; Industry, Water and Waste Management (including abstractions and discharges); Land Use; Recreation and Tourism; Science and Education; Shipping and Navigation (including maintenance dredging) and Ministry of Defence activities. Codes of Conduct were produced for the largely unregulated recreation and sporting activities (water and airborne recreation; walking, dog walking and horse riding; bird watching; angling and bait digging; motorised recreation; wildfowling and field & study groups). HAG had a major role in producing the Codes, and is now promoting them and helping to monitor their implementation.

7.4 LOCAL CO-OPERATION: COASTAL PARTNERSHIPS AND FORA

Partnerships such as the Humber Estuary Relevant Authorities Group do have formal decision making roles, as set out in the Habitats Regulations.

As part of the Humber Rural Pathfinder project, which is funded by Defra, an examination is in progress on good practice on engaging and consulting with local communities on environmental issues associated with the East Riding coast and the Humber Estuary. The results should be available at the end of 2006.

8.4 STOCKTAKING

We would support the challenges identified by the exercise. There seem to be two major dilemmas:

- Local needs v national consistency
- Sectoral requirements (often statutory) v integration (multi-functional).

8.4f Funding is a key issue; it is usually easier to gain funding for a one-off project, eg producing a plan, but not for its sustained implementation and 'operation'. The plan is irrelevant unless it makes things happen or stops unwanted things occurring. Saying that this is the day-to-day business of the organisations concerned may be right in theory but in practice, where there are a number of parties involved, it needs active (and dispassionate) co-ordination to ensure that things happen. It becomes messy when, a number of organisations (HERAG has 34) are each expected to chip in, say, an average of £5k each year. There is difficulty in gaining continuity if one or two organisations withdraw unilaterally, and in a number of cases the non-replacement of a project manager has been followed by the initiative fizzling out.

Question 1

Information on the Humber was previously supplied for the Stocktaking exercise. One area where greater commitment may be required is from the economic development community. Economic development initiatives are represented on the partnerships, have sustainable development amongst their objectives and recognise the constraints that can be imposed by nature conservation designations. In reality these issues are often not in the forefront of minds. There are also business benefits to be realised from the natural and heritage environments.

9 Vision and Question 2

The vision is generally supported:

- (a) Sustainable development is not just a case of "balancing" human activities and conservation objectives but enhancing and achieving wins for both. In fact in some places the balance may be skewed against human activities where the natural and historic environments have statutory protection.
- (b) Supported but it should not be another planning requirement on top of the present ones.
- (d) Supported but how are "good practices" determined and evaluated? Too often an individual or group will claim what they do now (or their hobby horse) is the good practice, which everybody else should adopt. To be useful, practices to be considered 'good' require objective appraisal and benchmarking, and then active marketing. How do you get people to change their practices - the "not invented here syndrome"?
- (e) This is an area where Government should **require** collaboration between statutory agencies, local authorities, etc. There can be no excuses for the public sector not working together in a joined up manner. There are however real

difficulties of resolving the priorities between organisations when substantial funding is needed to implement actions, eg reconciling local demands with a national priority system for organisations like the Environment Agency. Partnership working can also be time consuming for over-stretched agencies. Properly constituted and organised ICZM partnerships could be a rational means of trying to resolve conflicting interests and priorities, identify new sources of funding and manage the aspirations of local communities. They should not be constrained by administrative boundaries but be based on natural ones for coastal management.

- (f) (g) We strongly support the proposal for a discretionary support with stakeholder involvement.

10 Proposed Action to Implement an ICZM Approach

Policy and Strategic Direction – Question 3

We support the proposals and emphasise the need for better co-ordination between Government departments, and between the Government and its agencies, which, amongst other things, should simplify matters and enhance communication. The gaining of the motivation and co-operation of the voluntary and business sectors to contribute is made more difficult if mixed and conflicting messages are received from the public sector.

Planning and Decision Making – Questions 4 and 5

- (h) Developing and rewriting PPG20 could be the most practicable step by Government but it is worrying to see that even ‘consideration’ is qualified by “when resources permit”.
- (i) Agreed but this must also be reflected in the Project Appraisal Guidance of Defra’s Coast and River Engineering Division, including cost-benefit analysis.
- (j) Agreed, we see the Water Framework Directive, with the Natura 2000 sites as special areas within the river basin management plan, providing the environmental leg of sustainability with ICZM ensuring that the social and economic ones are also included.

Question 6

We are concerned that a statutory requirement would impose prescriptive burdens on coastal agencies and be inflexible in relation to local circumstances. We recognise that by making ICZM a statutory task it will help some public sector organisations commit funds to the work. We suggest that any new legislation or changes to existing Regulations, etc. would be achieved through the Marine Bill, and would wherever possible be aimed at simplification and streamlining of decision-making. It would be inefficient to wait for yet more legislation at a later date.

Coastal Partnerships

Question 7

- (m) Supported, although this could be a large talking shop. There could also be more local conferences, eg Yorkshire coastline plus the Lincolnshire coast to the Wash. There could be a case for a smaller “round table” group – perhaps one person from each region plus key players from Government and few Agencies – max number 20? One task would be the evaluation of practices and their promotion.
- (n) This should include site visits – “seeing is believing”.
- (o) We support this suggestion but it is a task that needs to be undertaken with sensitivity, particularly as it could be seen to be the heavy hand of Central Government on local activities.

Please also see the earlier comments made on finance (8.4f). In addition it is important to keep the community and interest groups engaged and active. Apathy quickly sets in if they have not got a role that makes a clear contribution.

Question 8

This could be a task for the roundtable (see comment on m).

Questions 9

We would point to the series of compatible initiatives associated with management of the Humber – English Nature’s Regulation 33, the Environment Agency’s ‘Planning for the Rising tides’ (Humber Flood Risk Management Strategy), the recent review of environmental permits in relation to the Humber’s conservation objectives, the Humber Management Scheme with its supporting Codes of Conduct, and Associated British Port’s Humber Strategy and its creation of intertidal habitat to compensate for environmental impacts. These initiatives are founded on environmental surveys, research and mathematical modelling of estuary processes and socio-economic studies.

Question 10

We think the Stocktake Report covers the issues well but please note our comment on Question 1. Since the Stocktake Report was published, the Humber Management Scheme and its Codes of Conduct were adopted and, following on from the Humber Estuary Shoreline Management Plan, a Humber Coastal Habitat Management Plan (CHAMP) and Flood Risk Management Strategy were produced; the latter was subject to strategic environmental assessment. Work is in progress on the Humber Environmental Data Centre and the South Humber Bank Wildlife and Heritage Partnership project.

Question 11

HAG does not fund the partnership, the cost of our meetings and minor expenses are met by HERAG. HAG is dependent on the continuity of this funding for it to contribute effectively.

Data and Information – Question 12

Humber INCA is developing the Humber Environmental Data Centre under contract from Yorkshire Forward to aid strategic planning and environmental impact assessments for specific developments (see note amended). This would be valuable for ICZM and for data requirement associated with contingency planning for pollution incidents and COMAH plans, although the stability of funding for the long-term is an issue. Data and information on the historic environment, and socio-economic issues should be included.

Public Awareness, Education and Participation - Questions 13

The Humber Estuary Standing Conference was instigated in 1992, building on previous initiatives, and has held annual meetings since then. It brings together delegates from the public, business, voluntary and education/research sectors and usually attracts between 70 and 100 delegates.

The South Humber Bank Wildlife and People project comprised of North Lincolnshire Council, English Nature, Environment Agency and Lincolnshire Wildlife Trust, with English Heritage input, has education as a key part of its 5 year Heritage Lottery Fund project developing nature conservation and historic opportunities adjacent to the estuary. Its Project Officers attend HAG meetings.

The Humber Environmental Data Centre project includes an objective to develop materials for schools to help the understanding of environmental issues and data analysis.

Monitoring Progress – Question 14

We support the development of an indicator system although this will be a difficult task because of the varied nature of the English coastline. An expert group at national level may be the way forward. There will also need to be monitoring against the targets of the river basin management plans for the Water Framework Directive and, for an area such as the Humber, the Special Protection Area and Special Area for Conservation objectives.

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Note on: HUMBER ENVIRONMENTAL DATA CENTRE

The Humber Environmental Data Centre (HEDC) project supports Yorkshire Forward's Humber Trade Zone initiative on economic development and helps the Yorkshire and Humber Region to achieve its sustainable development aims.

The database will tie together data sources on the unique environmental character and opportunities of the Humber area and translate that data into information, so as to increase and accelerate Humber Trade Zone HTZ success. It will also provide a cohesive and planned approach to tackling the environmental issues and opportunities associated with the estuary, a candidate Special Area of Conservation, and its environs. It will produce effective, robust and clear environmental and sustainable management advice for businesses and other organisations within the Humber sub-region. The project will, therefore, strengthen and facilitate the implementation of HTZ and also provide information on the environment for use in developing and applying regional and sub-regional plans and strategies, and for Integrated Coastal Zone Management (ICZM).

Key activities include:

- Encouraging the sharing of information;
- Facilitating access to key environmental data;
- Facilitating the preparation of regional, sub-regional and local policies and plans including the preparation of Strategic Environmental Assessment and Appropriate Assessments;
- Enabling developers to quickly evaluate and realise expansion opportunities, and to have readily available, quality controlled data for Environmental Impact Assessments;
- Enabling current operators within the HTZ to monitor and report on their impacts and to facilitate compliance with environmental legislation;
- Establishing stronger links between industry and the environmental regulators;
- Providing information for contingency planning for environmental emergencies;
- Providing educational services within the Waters' Edge Visitor Centre aimed at exploring the concept of sustainable development within the Humber sub-region.

Objectives

- To translate the huge amount of disparate environmental data on the Humber into information that can be used as the basis for promoting environmental quality as an advantage for investment in the HTZ.
- To assist commercial ventures and public policy makers in making informed and sustainable decisions regarding the economic development of the estuary.
- To promote environmental awareness to a range of users of and stakeholders in the Humber.
- To create a definitive source and comprehensive repository of environmental data for the Humber sub-region.

- To meet the ordinary operational environmental data needs of businesses and public/regulatory bodies in the Humber sub-region through the translation of raw data into information.
- To provide both commercial operations and the general public with access to and understanding of environmental information.

HEDC is funded by Yorkshire Forward, the Regional Development Agency for Yorkshire and the Humber, and is being developed under contract by the Humber Industry Nature Conservation Association (Humber INCA) working with the North and East Yorkshire Ecological Data Centre. The project started in July 2005 and ends in March 2007, when HEDC becomes an operational system for users.

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