



# Shoreline Management Plan Review and the Historic Environment: English Heritage Guidance



ENGLISH HERITAGE

This note has been produced to provide Coastal Groups and consultants with information and guidance on the coastal Historic Environment, sources of advice and data, the legislative and planning background, and procedures for consultation during Shoreline Management Plan (SMP) review. It is intended to supplement and amplify *Shoreline Management Plan Guidance*.  
*Volume 1: Aims and Requirements and Volume 2: Procedures (Defra 2006)*.

## INTRODUCTION

It must be emphasised at the outset that English Heritage accepts the need for change, and is concerned to collaborate with planning authorities to develop constructive and sustainable solutions to problems and apparent conflicts.

The historic environment comprises all past traces of human existence. It includes evidence for past environments, archaeological sites, historic buildings and the historic aspects of the wider landscape. These assets are unique and, once damaged or destroyed, cannot recover or be re-created. They are valuable for their own sake, as repositories of evidence for human activity over millennia; for their contribution to landscape character, sense of place and community identity; and as an economic asset which underpins leisure and tourism.

Designated coastal historic assets include Scheduled Monuments, Listed Buildings, Protected Wrecks, and Registered Parks, Gardens and Battlefields. However, these represent only a small proportion of the total number of known coastal historic assets, and many others remain to be discovered. Many historic assets are vulnerable to the effects of coastal change, including cliff erosion, dune and spit migration, beach lowering and flooding (see **Box 1** for more detail).

In section 3.4 of *Shoreline Management Plan Guidance Volume 1* (Defra 2006), key issues needing to be addressed during environmental assessment are specified, including the historic environment (3.4a). More specific procedural guidance and advice from English Heritage is presented here. Information on historic environment professionals is given in **Box 2**, together with addresses of websites providing contact details. The statutory and planning framework for the historic environment is outlined in **Box 3**.

## STAGE I: SCOPING

During the Scoping stage of SMP review, Coastal Groups or their consultants should establish contact with:

- Local Authority Conservation Officers and Archaeological Officers, (often referred to as 'curators'), specifically the County Archaeologist(s) or equivalent, and Historic Environment Records staff;
- The appropriate English Heritage (EH) Regional Office;
- The English Heritage National Monuments Record (NMR); and
- The English Heritage Coastal Strategy Officer.

The principal aims at this stage are to inform interested parties that an SMP is being prepared, request relevant data, and identify all key stakeholders.

**Local Authority** staff curate information on Listed Buildings, Conservation Areas and archaeological sites within the SMP area, and in most cases this data can be supplied digitally. Practice varies between authorities, but there may be a charge for provision of information.

Generally speaking, Conservation Officers are located in District Authorities, whereas most archaeological officers, including the County Archaeologist or equivalent officer, are in County Council Planning Departments. The latter include officers who curate the *Historic Environment Record* (HER), also known as the *Sites and Monuments Record* (SMR). The HER is a database providing information on all known historic buildings, archaeological remains and historic landscapes, including designated sites (Box 3). However, HERs do not include assessment of significance. It is important to note that the current rules governing designation do not permit scheduling of some categories of archaeological site, so that HERs can include some undesignated sites that are as important or more important than Scheduled Monuments in the study area.

- A **Low Lighthouse, Burnham-on-Sea, Somerset**, originally built 1833 (Grade II Listed). Will all intertidal historic buildings and structures be sustainable through the 21st century?
- B **Covehithe Church, Suffolk**. This is one of several listed medieval churches on the East Anglian coast which are located on rapidly eroding unconsolidated cliff coasts. Isolated structures will pose problems of management later in the 21st century.
- C **Happisburgh, Norfolk**. Pill box eroded from cliff, now lying inverted on the beach. Already historic sites and structures are being impacted by natural processes of coastal change.



The first point of contact at the **English Heritage Regional Office** will normally be the Inspector(s) of Ancient Monuments responsible for the SMP area. This officer should be asked to nominate a regional English Heritage representative for the SMP review. This might be him or herself, a Regional Advisor for Archaeological Science, Regional Planner or other colleague.

It appears that the type of EH involvement in SMP review will depend upon the interpretation placed by the Coastal Group on Defra's (2006) SMP Guidance. In some cases, EH regional officers have already been invited to sit on the SMP Client Steering Groups, but in other regions involvement just as a Key Stakeholder may be preferred by the Coastal Group. EH's preference is for the former, as this offers a way of integrating historic environment advice at an early stage, thereby reducing the risk of delay and duplication. However, the final decision rests with the Group. It must be appreciated, unfortunately, that English Heritage Regional Offices are obliged to give priority to statutory functions, and their capacity to contribute as fully as might be wished to SMPs may, in some cases, be limited.

Whatever type of engagement is chosen, early identification and consideration of historic environment issues should go some way towards minimising controversy during the public consultation. It may be of interest to note that the consultant's analysis of the 2,430 responses received during the public consultation for the pilot SMP 3b (Kelling Hard to Lowestoft Ness) indicated that 1,065 referred to 'Heritage', and only issues of compensation and social justice aroused greater interest (J. Walker, pers. comm.).

The **English Heritage Coastal Strategy Officer** should be copied into the chief communications between the Coastal Group, consultant and the EH Regional Office by the Group's secretary. He will rarely be able to attend regional meetings, but needs to maintain an overview of progress, and to be sufficiently well-informed to be able to contribute constructively if any difficulties arise. He will be a member of the national SMP Steering Group, principally to participate in quality control.

It is important for the group and its consultants to raise awareness of the SMP concept, aims and objectives at the scoping stage. Historic environment professionals may not be aware of the iterative nature of the SMP review process. They may have the impression that the present round of review is the only opportunity to ensure that their concerns are incorporated into the process. Consequently, they may have an unrealistic idea of what an SMP is, and what it does.

English Heritage is issuing guidance to its Regional Offices in parallel with this guidance, but it is necessary to explain that they will be asked for further input during strategy and scheme development, and that there will be another review in approximately ten years.

## STAGES 2 & 3: ASSESSMENTS TO SUPPORT POLICY/ POLICY DEVELOPMENT.

English Heritage is currently commissioning a national programme of *Rapid Coastal Zone Assessment Surveys* (RCZAS). In areas where RCZAS have been completed the coastal HER and NMR will have been up-dated, and will be as comprehensive as possible at present. In addition, an important output from the RCZAS will be an appraisal of the potential, significance and vulnerability of coastal historic assets for each Policy Unit in the plan area. This can contribute directly to SMP Policy Development. However, due to resource constraints, full national RCZAS coverage will not be completed in time for the present round of SMP review. Where RCZAS reports are not available the HER and NMR will include some records of coastal assets, but the overall record will often be incomplete or out of date. Furthermore, there will usually be no appraisal of historic asset potential, significance and vulnerability.

An appraisal of this type is needed for SMP policy development, but the 'raw' HER and NMR data do not supply this. The approach adopted for appraisal development in North Kent (where the RCZAS was incomplete when SMP review began) provides a model. It involves several stages.

1. Transfer of HER and NMR data, including data on statutorily designated, and registered, historic assets (see **Box 2**) to the consultant.
2. Identification by the consultant of Policy Units where No Active Intervention, Managed Realignment, or Advance the Line are likely to be preferred options; and definition of areas likely to be impacted either by continued coastal erosion or by active management.
3. A one-day workshop attended, (at least), by the consultant's archaeological advisor and other officers, Local Authority historic environment staff, and English Heritage regional officers, to assess the available data and reach consensus on those units where historic environment considerations will most strongly influence selection of the preferred policy.

4. Collaboration in producing an appraisal of the significance and vulnerability of known historic assets within each Policy Unit, (with particular attention to those units where change is likely to occur), to contribute to overall SMP policy development. This appraisal must identify aspects of historic environment protection or mitigation which will require more detailed attention during strategy development.

Consultation with Local Authority heritage professionals and EH is likely to define the need for additional fieldwork and survey. This should be highlighted in the completed SMP, for implementation when preparing coastal strategies.

To achieve transparency it is important that once data and appraisals have been provided and developed, a continuous dialogue between historic environment professionals and the Coastal Group and its consultant is maintained. This will initially relate to verification and clarification of the data and appraisals. This input must be seen as making a *real* contribution to policy development, or it will not be taken seriously

## STAGE 4: PUBLIC EXAMINATION

Once the SMP consultation draft is ready, historic environment consultees should receive notification that it has been prepared, and be invited to express support for it, or objection. Despite pro-active consultation, it is likely that the preferred policy for some Policy Units presented in the Consultation Draft will run counter to historic environment objectives. In general terms, English Heritage's initial advice is that significant historic assets should be protected by means of coastal defences wherever this is economically, technically and environmentally sustainable. This may well prove inconsistent with the SMP driver of developing more sustainable and naturally-functioning coastlines. For example, a Scheduled Monument or Listed Building might be located on top of an eroding cliff, which represents a sediment source: hence the preferred policy might be 'No Active Intervention'. It might be impossible to reconcile the two sets of drivers during SMP development. English Heritage's support for the SMP will be dependent on the definition of appropriate protection or mitigation for such historic assets.

The consequences of adopting and implementing policies which will result in damage to, or loss of, historic assets in terms of long-term shoreline response and evolution must be identified. SMP outputs at **Stages 5** and **6** (Finalising and Disseminating the Plan) include an Action Plan,

**D Ryde West Sands, Isle of Wight.** Recording a Middle Bronze Age hurdle trackway. Photograph: Rebecca Loader.

**E Holme-next-the-Sea, Norfolk.** Bronze Age circular timber structure enclosing an inverted oak tree, dated to 2050-2049 BC, and known as 'Seahenge'. The site has been fully excavated and recorded in advance of erosion.

**F South Woodham Ferrers, Essex.** Section at salt-marsh edge, showing a submerged post-glacial land surface, overlain by intercalated clay and peat sediment units. Sections of this type provide important palaeo-environmental data on relative sea-level changes and estuary development.

**G Wootton-Quarr beach, Isle of Wight.** Part of a Neolithic submerged forest, dated to 3463-2557 BC. Submerged forests occur widely around the English coasts: they provide significant information on ancient environments and useful reference data for dendrochronology.

**H South Woodham Ferrers, Essex.** Bronze Age salt evaporating hearth. The vivid red colouring results from oxidation of clays during brine evaporation. Photograph: T.J. Wilkinson.



and this should include provision for additional studies to quantify the rate of resource loss, and to identify appropriate mitigation strategies, to be defined specifically as part of strategy development. Resources should be identified to cover the costs of a mitigation strategy for conservation, publication and deposition of the archive in a publicly accessible location. At the scheme stage, mitigation might involve 'preservation by investigation' for archaeological sites (i.e. survey, excavation and recording) or recording, (followed by controlled dismantling and/or relocation in some cases), for historic buildings.

**Further advice about how English Heritage takes part in the SMP process can be obtained from the Coastal Strategy Officer in the Maritime Archaeology Team.**

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## BOX 1 WHAT IS THE COASTAL HISTORIC ENVIRONMENT?

The coastal historic environment comprises a wide range of sites, structures and landscapes. These include:

**Buildings**, such as coastal military defences, port and harbour facilities, lighthouses, customs and coastguards' houses, mills, marsh farms, chapels and other religious foundations. In small coastal settlements where 'Hold the Line' is not the preferred policy option identified in the SMP, a wider range of historic buildings including churches, houses and other vernacular buildings may be at risk. Many historic buildings are on sites where there is also significant below-ground archaeology. Most obviously, beneath and around a typical medieval church there will be remains of earlier buildings, besides thousands of burials interred over the last thousand years or so.

**Palaeolithic deposits**, related to the earliest occupation of North-West Europe by hunter-gatherers, up to about 700,000 years ago. Very early sites, occupied by biologically pre-modern humans, are exposed on foreshores and in cliff sections at a number of locations in the east and south of England. Some are of national or European significance.

**Post-glacial (Holocene) prehistoric archaeological sites** that were on dry land when occupied, but which have been submerged by rising relative sea-level over the last 12,000 years, and now are only visible between tides, or are buried beneath Holocene sediments. These sites range from hunter-gatherer camps, though to settlements of early farmers. They are often very well preserved, since they have been sealed and protected by later deposits.

**Peat deposits** outcropping on foreshores, and buried within coastal sediment sequences. They provide information on past environments and relative sea-level change, and may be associated with 'submerged forests' and prehistoric artefacts, such as pottery, stone and metal tools.

**Wood and timber structures** of many types survive in the intertidal zone, and within coastal sediments, including trackways, jetties, wharves, fish-traps and unique structures such as the Bronze Age timber circle on the Norfolk coast known as 'Seahenge'.

**Shell middens** – mounds of shell and bone waste produced by prehistoric and later fishing communities are common, especially in the north and west of the country. They provide information on economy and diet.

**Salterns:** (sites where salt – an essential preservative in the past – was produced). The earliest known examples date from the Bronze Age, around 1200BC, and the industry still continues today.

**Sea-walls** and other flood and coastal defences. The earliest known coastal defences are in the Severn Estuary and are of Roman date, but many sea walls were originally constructed in the Middle Ages

**Wrecks, hulks and aircraft.** These range from prehistoric timber boats to Second World War casualties.

The Historic Environment also comprises entire **landscapes**. Parks, gardens, and battlefields are obvious examples; but many landscapes are the product of human land use and planning over thousands of years. Some coastal marshes, for example, include complex earthworks, settlement remains and drainage systems dating back to the medieval period. In contrast 19th century land-claim produced a much simpler rectilinear landscape. **Historic Landscape Characterisation** is an approach designed to understand and define landscapes and to aid the planning process.

## BOX 2 HOW IS HISTORIC ENVIRONMENT ADVICE PROVISION ORGANISED?

**English Heritage** is the Government's advisor on all aspects of the historic environment in England. In Wales, Cadw provides similar functions. Although sponsored by the Department for Culture, Media and Sport (DCMS), which has overall responsibility for heritage policy in England, English Heritage works closely with other Government Departments responsible for planning, housing, transport and the constitutional framework within which most decisions affecting the historic environment are made. English Heritage's work falls into three main categories: identifying buildings of historic or architectural interest and ancient monuments for protection; assisting owners and other bodies with conservation responsibilities to secure the future of England's historic environment; and helping the public to appreciate, understand and enjoy their heritage. The National Heritage Act 2002 enabled English Heritage to assume responsibility for maritime archaeology in English coastal waters, modifying its functions to include securing the preservation of ancient monuments in, on, or under the seabed, and promoting the public's enjoyment of, and advancing their knowledge of ancient monuments, in, on, or under the seabed.

English Heritage has offices in London and Swindon, (where the National Monuments Record (NMR) is curated), and nine Regional Offices. The EH Maritime Archaeology Team is based at Fort Cumberland, Portsmouth. For more information and contact details, see

<http://www.english-heritage.org.uk>

**Local authorities.** Most local authorities have in-house or shared access to Conservation Officers, who deal with historic buildings, and Archaeological Officers who curate local Historic Environment Records (HERs) and provide advice to Planning Officers on development control and mitigation. HERs are a record of all known archaeological and historic remains, both designated and undesignated, within the areas of each local authority. In the majority of cases, Conservation Officers and Archaeological Officers are situated in planning departments at the district, unitary or county level, and all are involved in the formulation of strategic planning and development control advice. The County Council Archaeology Service is headed by a County Archaeologist, or equivalent officer. Many district authorities obtain their archaeological advice from officers and Historic Environment records based within County Councils. A full list of local authority archaeological advisers is available at:

[http://www.algao.org.uk/members/fs\\_memb.htm](http://www.algao.org.uk/members/fs_memb.htm)

The quality of information in HERs is variable, depending on the intensity of earlier survey, and resourcing. In general, the coastal Historic Environment is under-represented, due to difficulties of survey and site detection. Some parts of the coast have been more intensively studied than others. In response to the information deficit in England, English Heritage is currently commissioning a series of Rapid Coastal Zone Assessment Surveys (RCZAS), but funding constraints mean that national coverage will not be achieved in time for this round of SMP review.

Advice on local authority conservation officer contacts can be provided by the Institute of Historic Buildings conservation at:

<http://www.ihbc.org.uk/index.html>

I **Shornmead, Kent.** Part of a timber and hurdle fish-trap. V-shaped fish traps of this type date from the Anglo-Saxon period onwards. Photograph © Wessex Archaeology.

J **Oulton Broad, Lowestoft, Suffolk.** Hulks of early 20th century steam drifters. Hulks of historic vessels are widespread in English estuaries.



## BOX 2 CONTINUED

**Consultants and contractors.** Commercial archaeological and historic buildings organisations range from individual consultants to archaeological units operating nationally, capable of undertaking extensive surveys and excavations in advance of large-scale infrastructure developments such as airports and wind-farms. Consulting companies better known for providing engineering and environmental assessment services also employ archaeologists. Professional accreditation is provided by the Institute of Field Archaeologists, and a Register of Archaeological Organisations will be found on the IFA website (although this is not a definitive list of all competent consultants):

<http://www.archaeologists.net>

**Other organisations.** Organisations as diverse as the Ministry of Defence, Defra, the Environment Agency, Forestry Authority, the National Parks, and the National Trust also include archaeologists amongst their staff.

## BOX 3 HISTORIC ENVIRONMENT DESIGNATIONS AND PLANNING GUIDANCE

Only a very small proportion of recognised and recorded historic assets – less than 5% – have any form of statutory protection and many more archaeological sites – perhaps the majority – remain undiscovered.

Designated sites include:

**Scheduled Monuments (SMs)** designated under the Ancient Monuments and Archaeological Areas Act 1979;

**Historic shipwrecks** designated under the Protection of Wrecks Act 1973;

**Listed Buildings** and **Conservation Areas** designated under the terms of the Town and Country Planning Act 1990. Listed buildings are graded I, II\*, or II.

Decisions on works affecting scheduled monuments and historic wreck sites generally require a specific permission from the Secretary of State for Culture, Media and Sport (DCMS) alongside any other consents such as planning permission. Works to listed buildings may require Listed Building Consent, and the demolition of buildings within a conservation area may require Conservation Area Consent.

Other historic sites, including World Heritage Sites, historic parks and gardens and historic battlefield sites are included within non-statutory registers, which underline the need to consider their special importance within the planning process, when development is proposed. A detailed listing of all relevant designations is provided in Chapter 2 of “Coastal Defence and the Environment” (MAFF 1993).

The system of designation is currently being reviewed, and new legislation is proposed (the DCMS **Heritage Protection Review**, HPR). Changes in provisions are likely.

Government Planning Guidance on the historic environment is set out in detail in *Planning Policy Guidance Note 15: Planning and The Historic Environment* (PPG 15) and *Planning Policy Guidance Note 16: Archaeology and Planning* (PPG 16). This guidance emphasises the desirability of protecting historic remains, whether designated or not, and recognises that this should be a material consideration in the planning process. It also stresses that planning decisions should always be informed by an understanding of their impact on historic assets. The guidance also recognises that as these assets are non-renewable, they should wherever possible be preserved, and should not be needlessly or thoughtlessly destroyed. The importance of gaining a good understanding of the historic environment in order to develop appropriate coastal zone management policies is also recognised in *Planning Policy Guidance Note 20: Coastal Planning* (PPG 20: 1992). All PPGs are under revision at the time of writing.

This approach was embodied in the former MAFF's Flood and Coastal Defence Project Appraisal Guidance (FCDPAG). Section 2.6 of FCDPAG 5, for example, stated that: “Where archaeological remains or historic buildings are present, these should be avoided or alternatively preserved in situ wherever practicable”, and “PPG 15, PPG 16...provide government advice on best practice with regard to archaeological and heritage sites. Where planning permission is required, these documents provide a framework for the assessment and mitigation likely to be required by the planning authority. Whilst there is no legal obligation to protect unscheduled sites, PPG 16 sets out best practice which should be followed”.

These principles have been incorporated in *Shoreline Management Plan Guidance* (Defra, 2006): see main text.

**English Heritage** is the Government's statutory advisor on the historic environment.

Our role is to champion and care for the historic environment which we do by:

- improving understanding of the past through research and study
- providing conservation grants, advisory and education services
- identifying and helping to protect buildings and archaeological sites of national importance
- maintaining over 400 historic properties and making them accessible to the broadest possible public audience
- maintaining the National Monuments Record as the central publicly accessible archive for the historic environment in England.

For more information, please see [www.english-heritage.org.uk](http://www.english-heritage.org.uk)

**K Withernsea, East Yorkshire.** All that remains of the churches of St Mary, Withernsea (lost around 1444) and St Peter, Owthorne (lost 1786-1824) is this memorial to the 'Sister Kirkes'.



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