1. Background

1.1 The spectacular estuaries of the Dyfi, Mawddach and Dwyryd and a 23 mile coastline of sandy beaches backed by dunes and low boulder clay cliffs contribute greatly to the overall landscape diversity of Snowdonia. These landscapes provide a range of habitats recognised nationally and internationally by the various designations such as National Nature Reserves, Sites of Special Scientific Interest, Special Areas of Conservation and the Dyfi Estuary World Biosphere Site.

2. Update on Coastal and Maritime Issues in Snowdonia

2.1 The Marine and Coastal Access Act 2009 (MCAA) provides the framework for marine planning in the UK. It provides for production of a Marine Policy Statement (MPS) for the UK and sets Welsh Ministers as the marine planning authority for Wales responsible for preparing a marine plan for both the inshore and offshore regions.

2.2 The vision for the Welsh inshore and offshore marine area as set out in the Initial Welsh National Marine Plan (WNMP) consultation document published in November 2015 is that:

By 2036, Welsh seas are clean, healthy, safe, productive and biologically diverse:

- Through an ecosystem based approach, our seas are healthy and resilient and support a sustainable and thriving economy.

- Through access to and enjoyment of the marine environment, health and wellbeing are improving.

- Blue growth is creating more jobs and wealth; and, is helping coastal communities become more resilient, prosperous and equitable with a vibrant culture.

- The Welsh marine area is making a strong contribution to energy security and climate change emissions targets through the responsible deployment of low carbon technologies

2.3 The vision will be delivered through the plan objectives which are supported by general, cross cutting policies and sector-specific objectives and policies.

2.4 Should the final version of the WNMP be published prior to the completion of the ELDP revision then any policies or actions impacting on the role of the SNPA as a local planning authority will need to be taken into account.

3. **West of Wales Shoreline Management Plan**

3.1 A Shoreline Management Plan (SMP) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. In doing so, a SMP is a high-level document that forms an important part of the strategy for flood and coastal defence for the Welsh Assembly Government (WAG). The guidance issued by the Department for Environment, Food and Rural Affairs (Defra) (Defra, 2001) forms the basis for the preparation of SMPs in Wales.

3.2 The SMP is a non-statutory policy document for coastal defence management planning. It takes account of other existing planning initiatives and legislative requirements, and is intended to inform wider strategic planning. It does not set policy for anything other than coastal defence management. However, from this perspective, it aims to provide the context to, and consequence of, management decisions in other sectors of coastal management. Following the adoption of the SMP, the operating authorities develop strategy studies which identify the nature and type of works required for implementation which then lead to the scheme delivery (the design, construction and maintenance of the defences).

3.3 It should be noted that the SNPA’s jurisdiction as the local planning authority ends at Mean High Water for most of Snowdonia’s coastline, with jurisdiction to Mean Low Water occurring only on the estuaries of the Glaslyn/Ddwyryd, Mawddach and Dyfi.

3.4 The strategy broadly follows that outlined original North Cardigan Bay SMP although it encompasses a broader time period and sets out preferred management policies over 3 epochs up until 2105.

3.5 The new SMP acknowledges the need to adapt to, and mitigate against, potential sea-level rise in the future and as a result recognises that during the later epochs difficult decisions will have to be made in respect of changing policies of “holding the line” (HTL) to one of “managed re-alignment” (MR) or “no active intervention” (NAI) in certain areas. The following are the key changes between the new and old Shoreline Management Plans as they relate to the National Park.

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2 The generic shoreline management policies that deliver the plan, considered are those defined by Defra; they are represented by the statements:

**No Active Intervention (NAI)**: where there is no investment in coastal defence or operations

**Hold the Line (HTL)**: by maintaining or changing the standard of protection. This policy should cover those situations where work or operations are carried out in front of the existing defences (such as beach recharge, rebuilding the toe of a structure, building offshore breakwaters and so on) to improve or maintain the standard of protection provided by the existing defence line.

**Managed Re-alignment (MR)**: by allowing the shoreline to move backwards or forwards, with management to control or limit movement (such as reducing erosion or building new defences on the landward side of the original defences).

**Advance the Line (ATL)**: by building new defences on the seaward side of the original defences. Using this policy should be limited to those policy units where significant land reclamation is considered.
SMP2 PU10.10 Pennal Valley
Change from Do Nothing (DN) in SMP1 to one of Managed Re-alignment (MR) in all 3 epochs.

SMP PU10.19 Tonfanau
Change from Do Nothing (DN) in SMP1 to one of Managed Re-alignment (MR) in first two epochs then No Active Intervention (NAI).

SMP2 PU 11.4 Ro Wen Coast
Change from HTL in SMP1 and first epoch to MR in second epoch and NAI in third epoch.

SMP2 PU 11.5 Ro Wen Spit
Change from HTL in SMP1 to MR in first and second epochs and NAI in third epoch.

SMP2 PU 11.6 Llanaber
Change from HTL in SMP1 and first epoch to MR in second epoch and NAI in third epoch.

SMP2 PU11.9 Fegla
Change from HTL in SMP1 and first epoch to MR in second and third epochs.

SMP2 PU 11.10 Mawddach South
Change from HTL in SMP1 to MR in all three epochs of SMP2

SMP2 PU 11.13 Mawddach North
Change from DN in SMP1 MR in all three epochs of SMP2

SMP2 PU 11.15 Barmouth North
Change from HTL in SMP1 MR and first epoch to MR in second and third epochs of SMP2.

SMP2 PU 11.17 Egryn Marsh
Change from DN in SMP1 to MR in first epoch and NAI in second and third epochs of SMP2.

SMP2 PU 11.18 Sunnysands
Change from DN in SMP1 to MR in all three epochs of SMP2

SMP2 PU 11.19 Islawrffordd
Change from DN in SMP1 to MR in all three epochs of SMP2

SMP2 PU 11.20 Morfa Dyffryn
Change from DN in SMP1 to NAI in all three epochs of SMP2.

SMP2 PU12.1 Mochras
Change from DN in SMP1 to NAI in all three epochs of SMP2.

SMP2 PU12.2 Artro Southern Spit
Change from DN in SMP1 to HTL in first epoch and MR in second and third epochs of SMP2

**SMP2 PU12.3 Artro Estuary South**
Not included in SMP1. HTL in first epoch and MR in second and third epochs of SMP2.

**SMP2 PU12.3 Artro Estuary East**
Not included in SMP1. HTL in all epochs of SMP2.

**SMP2 PU 12.5 Llandanwg Dunes**
Change from DN in SMP1 to MR all three epochs of SMP2.

**SMP2 PU 12.8 Harlech Valley**
Change from DN in SMP1 to HTL in all three epochs of SMP2.

**SMP2 PU 12.9 Talsarnau**
Change from DN in SMP1 to HTL in first epoch and MR in second and third epochs of SMP2.

**SMP2 PU12.10 Briwet and Dwyryd Gorge**
Not included in SMP1. NAI in all epochs of SMP2.

**SMP2 PU12.11 Upper Dwyryd Estuary**
Not included in SMP1. MR in first epoch and NAI in second and third epochs of SMP2.

3.6 The implementation of these policies will, in the later epochs, undoubtedly have profound implications for certain coastal locations and communities and in some cases there will be a need to re-locate domestic and business properties, most notably at Fairbourne (see below) and along the Ardudwy coastline. Agricultural land, including previously reclaimed land, will also be lost.

3.7 There will also be implications for the National Park as coastal caravan park operators would seek to relocate pitches landward through the extension of site boundaries. Similarly property owners in Fairbourne (outside the Park boundary) would probably seek to relocate in the immediate vicinity and this could lead to pressure on the Authority to consider releasing or allocating land to accommodate this need. This would require planning permission, with applications determined in accordance to the policies set out in the development plan in operation at the time.

3.8 Returning estuaries such as the Dyfi and Mawddach to a more sustainable natural state through managed re-alignment could have benefits in terms of improvements to landscape quality and biodiversity and an increased flood prevention role by increasing their capacities.
4. **Fairbourne Project**

4.1 There are significant concerns over the medium to long term sustainability of defence at Fairbourne. There is a need to maintain existing defences and reduce flood risk to the area in the short term. However, any major increase in protection, particularly with respect to dealing with groundwater, flooding from rivers and flooding as a direct result of rainfall, particularly as the effects of climate change occur and as sea level rises, starts to create an unsustainable approach to management. This could lead to significant residual risk and the possibility of a catastrophic failure and flooding should the standard of defence be exceeded. For these reasons the intent of the plan is to move away from defence over the next 30 to 60 years, with the consequential need for relocation. There is little or no opportunity for adaptation, in the traditional meaning, in terms of defence or local protection to property, with no opportunity for roll back of the community. This makes Fairbourne different to many other areas facing similar increasing risk from flooding and erosion. If not defended, the village as a whole would be lost. While the situation at Fairbourne is at present quite unusual, it will not be unique. Defences would continue to protect the railway line along the rear of the village and this would provide opportunity for defence to some properties behind.

4.2 The project starts to address these complex issues, drawing upon the expertise and knowledge from a range of organisations including: Nature Resource Wales, Welsh Water, Gwynedd Council, Welsh Government and the local community. There is a clear need for this broad based approach taking a long term perspective.

4.3 One of the key perceived barriers to effective planning is the uncertainty associated with timescales. At present the threshold for change could realistically be in 30 years’ time, equally it may be possible to sustain the community over some 60 years. This uncertainty is recognised to be one of the core concerns to those living within the area, affecting the way in which they can plan for and invest in their future. The project, therefore, focusses on issues that have to be addressed now, setting in place those actions and investigations necessary to develop and inform longer term planning. Alongside this is the need to think to the future, planning for the time when the village will no longer be defended. This requires adaptive or eventuality planning.

5. **Seascape Study**

5.1 The Seascape Character Assessment was commissioned in January 2013 by Isle of Anglesey Council, also on behalf of Snowdonia National Park Authority and Natural Resources Wales.

5.2 The project brief set out a number of purposes for the report, summarised as follows:

- *Contributing to marine spatial planning, and playing an integrating role in the spatialisation of coastal landscape and seascape issues.*
• Informing reviews of the Management Plans for Snowdonia National Park and Anglesey Coast AONB.

• Extending the coverage of landscape/seascape assessment beyond the National Park and AONB boundaries (which follow the high water mark) in order to help ascertain the potential impacts of coastal and offshore developments on these protected landscapes.

• Informing planning policy with regard to offshore development, including energy generation.

• Capturing the perceptual and experiential qualities of the coast, and relating them to different physical environments and geographic areas.

5.3 The methodology followed current best practice guidelines for landscape and seascape character assessment. It reflected the holistic approach to landscape (and by extension seascape) of the European Landscape Convention, considering natural, cultural and perceptual qualities of seascape. The project was undertaken by a multi-disciplinary team with expertise in terrestrial, intertidal and marine environments.

5.4 The study area for the project includes coastal land, the intertidal zone, and extended out to the territorial limit (12 nautical miles offshore). Where land outside the study area boundary contributes to seascapes this has been recorded. Within the study area there is a great diversity of terrestrial, intertidal and marine environments. These stem from the varied geology, geomorphology and coastal processes within the area, and also from thousands of years of human activity on land and sea. Combinations of natural and cultural processes continue to shape the evolution of the area’s seascapes.

5.5 Seascapes character assessment is a development of the well-established process of landscape character assessment. It divides the study area into Seascapes Character Types (SCTs) (areas of recognisable character which occur across the study area) and Seascapes Character Areas (SCAs) (geographically distinct areas with a unique sense of place, and comprised of different combinations of SCTs).

5.6 A profile is provided for each SCT which includes a brief description and a map showing the locations where it occurs. Profiles are also provided for each of the SCAs (which are named by their geographical position) describing their location and context; summary description; constituent SCTs; key characteristics; cultural benefits and services; natural influences and sites; cultural influences and sites; perceptual qualities; forces for change and inherent sensitivity.

5.7 The Seascape Study has, with the LCA Study, been adopted as Supplementary Planning Guidance by the Snowdonia National Park Authority.
6. Implications for Review of Plan

6.1 Where relevant refer to, and insert cross references to the Supplementary Planning Guidance on Landscapes and Seascapes of Eryri in ELDP Revision

6.2 Continue to monitor situation in regard to Fairbourne, though it is unlikely that there will be immediate pressure to relocate residents or provide additional housing within the current epoch of the Shoreline Management Plan.

6.3 Continue engagement with the Welsh National Marine Plan (WNMP). Should the final version be published prior to the completion of the ELDP revision then any policies or actions impacting on the role of the SNPA as a local planning authority will need to be taken into account.