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Mr N Cleary
Head of Flood Management Strategy Unit
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Dear Mr Cleary

MAKING SPACE FOR WATER: GOVERNMENT STRATEGY FOR FLOOD AND COASTAL EROSION RISK MANAGEMENT

On behalf of the Coastal Group Chairmen of England and Wales I am writing to thank you for allowing us the opportunity to comment as part of your consultation exercise. I can confirm that the Coastal Group Chairmen have been liaising with both the Local Government Association Coastal Special Interests Group and the Institution of Civil Engineers Maritime Board with respect to our response. We have taken the opportunity, within one letter, to respond also to your consultation on the review of the Coast Protection Act (see paragraph 17) and on the question of High Level Targets (see paragraph 18). This will allow you to consider our comments alongside the wider discussion on your national Strategy for flood and coastal erosion risk management. I was also invited to attend a meeting with external consultants who are reviewing the roles and responsibilities of the Flood Management Division of Defra.

Can I first say that the Coastal Group Chairmen welcome the production of this consultation document and for the clear way that the wide-ranging issues have been set out. We believe that the document has provided a good over-arching view of the issues relating to reduction in risks for flooding and coastal erosion and it is very useful to have these summarised within one document. We believe also that a similar approach should be adopted towards these issues in Wales, thereby providing uniformity across the United Kingdom. It is also appropriate to try and consider these issues collectively at a time when Defra is taking the lead on the implementation of the European Union 'Recommendation on the integrated management of coastal zones'. We believe that Defra's involvement in ICZM, together with its more specific risk reduction role in relation to coastal defence, provides a big opportunity for partnership with local authorities and the key agencies in delivering sustainable coastal zone management for the first time on a national basis.

This review comes at a time when coastal defence operating authorities are particularly concerned about increasing levels of risk. Cliff recession and landsliding present significant problems to many communities around our coast. As highlighted by Sir David King at the recent Foresight conference, problems of coastal erosion could increase dramatically over the next one hundred years. Researchers (Bray and Hooke, 1997) have predicted that soft cliff erosion on the south coast of England could increase by up to 130% over the next fifty years. Others (Brunsden and Lee, 2000) have suggested that the anticipated sea level rise over the next decades, together with depleted beaches and a declining sediment supply from cliff erosion could result in significant changes in cliff behaviour which have had no parallel over the historic time period. Taking these points into account, we believe it is vital that a system for management of coastal risk is implemented which will provide the necessary reassurance for those involved in management of the coast, and for coastal stakeholders in the long term.

We believe that the title of the report 'Making space for water' provides a good, easily understandable synopsis of the issues of concern. We support the desire of Defra to highlight this issue because, in our opinion, a lack of public perception and awareness has been a major impediment to risk reduction policies on the coast for many years.

I would now like to turn to the responses of the Coastal Group Chairmen to the various questions raised as part of the consultation exercise.

Sub-Section 3.1 : Our Vision and Aim

The Coastal Group Chairmen support the vision and aim as set out in Section Three. We believe it is important to refer to coastal erosion and flood risk management in the context of its contribution to integrated coastal zone management. Defra's risk management framework will be informed by both catchment flood management plans and shoreline management plans. We believe that the requirements of the Water Framework Directive can be addressed in this way and that the excellent progress made in terms of understanding coastal cells and natural processes can continue alongside the work being undertaken by the Environment Agency on catchments. The attempt in the consultation document to integrate shoreline and river basin management issues with ICZM is welcomed (as set out in figure 2) but reference to this should also be included within the text.

With respect to the text of the vision it is important not to raise the expectations of stakeholders with respect to consultation. Many of the issues relating to coastal defence policy are based upon economic considerations, scientific research relating to coastal processes and environmental issues; decisions are supported by various legislation and guidance. The opportunity for the stakeholder to influence decision-making in the shoreline management field can, therefore, be quite limited. Careful consideration must, therefore, be given to the way that stakeholder involvement in the development of various plans and strategies is highlighted. With respect to the provision of transparent and measurable targets and performance indicators, the Coastal Group Chairmen wish to work with Defra in terms of seeking advice on updating the high level targets for flood and coastal defence and modifying, and if possible improving, the best value indicators prepared by the Local Government Association Coastal Special Interests' Group with respect to coastal zone management.

Sub-Section 3.2 : Need for a Strategic and Holistic Approach

Whilst we are not able to comment on the timescale for catchment flood management plans, we support the objective of completion of all Round Two Shoreline Management Plans by 2008. The completion of the first round of SMPs for the whole of the coastline of England and Wales

was a major success. This was only achieved through successful collaboration between Defra, the Coastal Group Chairmen and the Coastal Groups working with the Environment Agency. We believe that improved joint-working over the intervening period will result in effective plans for the future, particularly taking account of the support provided from projects such as Futurecoast, various European funded research programmes, coastal defence strategy studies and other initiatives.

Section 4 : Assessing and managing the risk of flooding and coastal erosion

We believe that the management of risk, as illustrated in figure 4, provides a sound basis for future policy. Alongside the work being undertaken at a national level by the Environment Agency in terms of assessing and mapping of flood probabilities a number of coast protection authorities and coastal groups are developing coastal evolution and risk maps and, where appropriate, more detailed maps on landslide risk have been developed (eg. Isle of Wight, Lyme Regis, Scarborough, Canterbury, etc). The Coastal Groups in the south-east of England are also leading a strategic monitoring programme which has incorporated the various monitoring systems of individual local authorities and the Environment Agency along that frontage in order to provide a consistent and uniform assessment of coastal change; other Coastal Groups are proposing similar actions. Coastal Group Chairmen and researchers within local authorities are anxious to work with Defra on broadening the methodologies for risk assessment and improving our understanding of coastal erosion risk and coastal evolution in the long term. It is important that projects supported by the European Commission such as 'EUrosion', 'PROTECT', 'Coastal Change, Climate and Instability', 'RESPONSE' and others are made good use of in developing this process. It is vital that those researchers who are responsible for dissemination of the results of European projects ensure that their findings are directed to the right organisations.

Defra has rightly highlighted the need to involve stakeholders in assessing coastal risk. Whilst excellent progress has been made by those directly involved in coastal defence issues in recent years and funding from Defra has allowed much needed research to take place, there has been a significant problem in terms of a broadening gap between the scientific community and the stakeholder. Over the last ten years or so there have been dramatic changes in the way we understand the coast and a range of issues including the impacts of climate change, new environmental legislation and refinement of thinking in terms of sustainability of coastal defence, managed realignment, etc. has not been adequately communicated to the stakeholder. This is a joint responsibility for both central and local government and all those organisations involved with coastal issues.

To help address this problem SCOPAC prepared a 'Non-technical guide to coastal defence'. It is believed that this kind of information should be disseminated much more widely in order to assist with public education, a topic where the public has held quite fixed views for probably over a hundred years. Education on coastal risk management will, no doubt, be greatly enhanced because of the media interest in climate change and natural disasters. Nevertheless, well presented information explains the reasoning behind coastal policy should be disseminated as widely as possible.

Question 4.1

The Coastal Group Chairmen support the principle of all four questions raised under 4.1. We believe it is vital to continue to have a nationally consistent approach but we do have concerns about the way that risks are assessed on the coast versus inland flooding. Equally, we support the assessment of risk which would comprise economic as well as environmental and social factors. We are concerned that, whilst the environment should be protected, the system relating

to European sites is quite rigid and inflexible. It is hoped that the situation can improve in the light of practical experience on a range of sites around the coast and through improved joint working between local authorities, the Environment Agency and English Nature, as highlighted in the Chairmen of Coastal Groups' Action Plan.

It is vital as part of the Strategy to involve stakeholders at all levels. This should not comprise just the general public but should also involve the insurance industry to a much greater degree. At a strategic level it is important to remember that the year 2000 saw the introduction of the United Nation's International Strategy for Natural Disaster Reduction. A range of excellent outputs have been produced already from this research programme and full use should be made of this resource. In terms of risk reduction we believe that Defra should support a range of responses including :

- removal of risks by avoiding or relocating inappropriate development away from vulnerable coastal areas through effective land use planning and / or compensatory measures such as those provided in France.
- reduce the consequences of risk by a range of measures including the provision of early warning systems.
- protection against potentially damaging events through coastal defence measures as well as through landslide management as part of coast protection schemes.
- acceptance of the risks with the resulting costs borne by the affected parties through maintenance and repair, emergency action or offset by the insurance system.

We support the national system of risk assessment as the main driver to securing the most cost-effective form of risk management for flooding and coastal erosion including prioritisation. However, we believe that there is insufficient accurate information on the costs of coastal erosion and instability (in human, economic and environmental terms) including those costs associated with damage, monitoring, remedial works and maintenance. We believe that further research undertaken with the assistance of Coastal Groups and Operating Authorities should examine how more accurate information can be recorded and costs calculated.

Questions 4.2 and 4.3

We support the provision of a nationally consistent basis for assessment of coastal defence schemes. We welcome the efforts that have been made to try and address concerns expressed in the past regarding an imbalance between environmental and socio-economic issues on the coast. However, we still have concerns in relation to the current system, taking account of the total loss of assets through coastal erosion. We would like to work with Defra and their consultants on a further examination of risks from both coastal erosion and flooding.

Question 4.4

We believe that the process for developing and submitting proposals for coastal defence schemes is about right. Improvements have been made in terms of streamlining the process at government level. The Coastal Group Chairmen, with the assistance of Defra, have sought to disseminate advice to those local authority engineers, the Environment Agency and consultants who may, from time to time, submit applications for coast protection schemes and studies.

Question 4.5

With respect to the sustainability of rural communities, we believe that a proper balance must be struck between developed and less developed parts of the coastline. For those areas that will not be defended, we believe it is important to provide information for frontagers of changes in coastal policy emerging from the SMPs. The form of advice and guidance could best be developed by local authorities working jointly with Defra. We also believe there are measures that residents can implement to prepare for longer term coastal change and the preparation of a guidance leaflet would be very useful.

Question 4.6

Research commissioned by the government, the Coastal Group Chairmen, local authorities also supported by European funding, is making a very substantial contribution to our knowledge on the subject of climate change and risk management. The question of information exchange on these various research programmes is particularly important and the responsibility rests with all those involved to ensure this information is properly exchanged and disseminated. The Coastal Group Chairmen welcome the establishment of the Climate Change Partnerships within England and very important point highlighted in the Foresight project and other research with respect to the potential for substantially increased rates of coastal erosion and coastal landsliding. In summary, we believe that the level of research promoted by Defra is appropriate and through the next round of SMPs those coastal locations that will be particularly vulnerable (eg. areas of developments facing rapid erosion and increasing landslide risk) should be prioritised for funding in order to allow studies, investigations and, where necessary, works.

Question 4.7

We believe that Defra guidance should reflect encouragement in terms of the adoption of reversible or adaptable flood and coastal erosion solutions. We believe the most positive form of encouragement to use these techniques is through presentation of examples of successful case studies and also awareness-raising on current thinking relating to coastal evolution.

Question 4.8

There has always been some question as to whether the indicative standards given in PAG3 apply universally or whether they apply to flood defence. Guidance has been received suggesting that coastal erosion is excluded from these indicative standards. We believe that the standards should be applied universally but some modification or clarity may be necessary.

Question 4.9

The present indicative standards (table 6.1 and 6.2 of PAG3) suggest a range of standards of protection. When assessing options for a specific scheme this potentially wide range of standards of defence can lead to confusion and misunderstanding and in some cases make for a complicated assessment process. For example, the cost differential between a fifty year return period and a two hundred year return period can be significant and yet this is the range given for land use Band B. Narrowing of the range perhaps as far as a single figure for each band might simplify both the appraisal process and the public's perception.

Question 4.10

In connection with indicative standards for flooding it makes no sense to have discontinuities in the standards of defence provided without sub-division of those communities into physically

discrete and separate cells. Care would need to be taken by the operators to ensure that standards were consistently applied.

Question 4.11

We believe that all coastal management initiatives should be developed through a participatory approach involving stakeholders. As stated in your report there is a risk of consultation fatigue, particularly in those areas where SMPs and strategy studies are being developed alongside other wider spatial planning and environmental-related initiatives. As stated above, our concern is to ensure that the expectations of stakeholders are not raised unnecessarily taking account of the framework for decision-making based upon economic, technical and environmental criteria. In fact the opportunity for the stakeholder to influence the process may be quite limited. It also appears that some of the models developed as part of the trials for the Round Two SMPs are over-complex, providing a considerable additional administrative burden for all involved, which is likely to have a resulting increase in cost.

Question 4.12

We believe that this question should be reviewed in the light of the responses from those Operating Authorities involved in the trial SMPs.

Section 5 : Strengthening the Sustainable Approach

Question 5.1

The Coastal Group Chairmen have always supported the philosophy of working with natural coastal processes, a fundamental aim which underpins coastal defence policy. However, there are certain locations along the coast where valuable economic assets exist and the coastal defence line may be fixed. In such locations a sustainable form of coastal defence taking account of opportunities for engineering will be pursued.

Question 5.2

We support the principles set out with respect to realignment policy. However, there are, clearly, questions of scale. Within the Norfolk Broads area, for instance, much of the land lies below sea level and any re-alignment to more natural features of high ground would have a devastating effect on communities and the agricultural industry of the area. Suitable mitigation measures (including financial support) would need to be put in place.

Question 5.3

With respect to achievement of biodiversity targets, it is recommended that the Environment Agency liaise with operating authorities at meetings of the Regional Coastal Groups to ensure that, where possible, minimum targets for habitat creation are achieved.

Section 6 : The role of rural land management

Question 6.1

The Coastal Group Chairmen welcome the inclusion by Defra of this topic within their consultation exercise. Increased winter rainfall arising from climate change is likely to have a very significant impact causing saturation of coastal cliffs and slopes and promotion of

landsliding and reactivation of relic landslides. Much can be done to reduce the triggering effect of rainfall through good land management and maintenance of drainage systems. Whilst the text in the consultation document focuses on flood risk it is believed that, in consultation with the Coastal Group Chairmen, a separate research project should be undertaken jointly with local authorities on the impacts of increased rainfall, increased erosion and weathering on eroding cliffs, slopes and landslide systems.

Question 6.2

We support the use of water level management plans to ensure that SSSIs remain in a favourable condition.

Section 7 : Measures to reduce flood risk through land use planning

Questions 7.1 and 7.2

No comment.

The Coastal Group Chairmen, working with the Local Government Association Coastal Special Interests Group, have been encouraging integration between the coastal engineering and planning professions. Following the publication of the report by the LGA Coastal Special Interests Group on 'Managing coastal risk' a further research project has been completed by the University of Cardiff in partnership with the Isle of Wight Centre for the Coastal Environment resulting in the production of a risk management pack to encourage joined-up thinking between the disciplines of coastal engineering, development control and strategic planning. These documents will be available for wide distribution in the autumn. We believe that integrated risk maps incorporating flooding, erosion, landslip and other hazards should be prepared by all local authorities for their areas of jurisdiction.

Question 7.3

We would support option (b), which provides a statutory requirement for RSSs and LDFs to include flood risk assessments, as defined by PPG 25. Paragraph (c) is also supported, providing developers undertake the analyses and they finance the consultancy work required.

Section 8 : Integration of drainage management in urban areas

Question 8.1

The Coastal Group Chairmen strongly support the need for integrated management of drainage systems within urban areas. We would support the proposal for the Environment Agency taking a lead in this area. There is a need for a thorough review of arrangements for and management of foul and surface water drainage. Since water companies took over maintenance of public sewers from local authorities there has been a significant reduction in the number of sewer renewals resulting in more collapses to public sewers and leakage from pipe systems which cause increased pollution, raising of ground water levels and other problems such as leakage into coastal landslide systems. We believe that, taking account of the predicted increase in winter rainfall of up to 30% by the year 2080, a rigorous system of control for surface water drainage must now be implemented. In many locations a thorough review of urban catchments may be required and this work can be best undertaken with liaison between the Environment Agency, the water companies and local authorities (particularly highway authorities).

Question 8.2

Taking account of the Environment Agency's role in relation to catchments, it would seem sensible that the Agency took the lead on water management in urban areas.

Question 8.3

Drainage falls to a number of differing bodies to apply and implement. We believe that it is not practical to bring all the aspects together within one body. However, it has long been the case that authorities operating in drainage have felt that there is a lack of co-ordination which leads to confusion and inconsistency of approach. We would suggest that the coasts provide a very good model of the way in which differing operating authorities can be brought together under a common umbrella of the coastal groups who can then co-ordinate the approach to the extent of joint working, common standards and, in our case, the Shoreline Management Plans. The principal difficulty with this approach towards drainage has been the lack of resources within the local authorities to support such an initiative and in that respect government could do much to kick-start the process by providing some modest additional funding to ensure that such an initiative is sustainable.

Question 8.4

It seems that the real problem is which agency is going to maintain these systems in the future if the systems are not adopted from the outset. Many systems are constructed under Section 106 of the Planning Act and are maintained by the developer for usually a maximum of fourteen years. It seems unlikely that local authorities will assume responsibility for these in the future with declining resources.

If these are 'sustainable surface water drainage systems' they should either be adopted by the Water Company; particularly where adopted surface water sewers discharge into them; or the Agency where they are used for recreational / amenity use. Some legislative change will, therefore, be required to enable a better management of these in the future.

Section 10 : Flooding from groundwater

Question 10.1

The commissioning by Defra of a scoping study for this source of flooding is welcome. The outcomes of the study show that this type of flooding is now a seriously recurring problem and, unfortunately, that no national body (yet) has accepted overall responsibility for dealing with the outcomes. Whilst the study touches upon information gleaned "locally" upon which postulations have been made, it is believed that this has been principally supplied by the Environment Agency. It follows that local authorities, who play the principal role in flood and post-flood assistance to victims, would welcome the opportunity to take part in the Peer Review mentioned and Steering Group participation in any studies commissioned as a follow up to the scoping report.

Question 10.2

The areas of research proposed are supported with the following addition.

- A study to assess the number of properties experiencing groundwater flooding which emanates from inside the property.

This is because, in such areas, old cottages can experience groundwater coming up through stone floors or fireplaces, which can last for many weeks. This kind of flooding can give rise to greater distress and a longer recovery time than, say, one flash-flooding event.

Question 10.3

The suggestion of better co-ordination of ground water flooding risks, in combination with other types of flooding, is supported. In this regard, the Environment Agency's recent initiative to provide early warning of groundwater flooding risks is applauded. It is accepted that the quality of these warnings is likely to be patchy (from area to area) at present due to the need to work with local authorities and others (who hold the quality local information) to establish realistic trigger mechanisms / indicators (see comments to 10.1 above).

Nationally, groundwater flood risk management is best served through extending the fluvial service provided by the EA. This would mean formalising the informal arrangements recently set up in their affected areas.

It would seem appropriate that the government control of any mitigation / intervention measures is best directed through the budgets of the Flood Management Division of Defra, using the existing project appraisal and priority scoring arrangements, adjusted if required.

Question 10.4

The need to set up more accurate and consistent record-keeping nationally is supported, as is the recording of the frequency and occurrence of flooding events. This could be considered as forming an extension of data being captured by the EA for the National Flood and Coastal Defence Database (NFCDD).

Question 10.5

Ground water flooding risk, in the context of flood and coastal erosion, is a very important issue. In combination with coastal erosion high ground water levels are usually the two triggering factors promoting coastal instability and a range of slope failure mechanisms. There is considerable expertise in local authorities in relation to investigation and management of coastal landslides, together with familiarity of patterns of ground movement. It is recommended that, as part of the shoreline management plan process, this issue is considered fully. The Environment Agency will, in every case, be a partner in the development of the SMP and this provides a good link in relation to wider ground water / flood risk issues. Increasingly there is the recognition that on a number of coast protection schemes it is difficult to separate the coastal erosion and coastal instability issues and the sensible solution that has been adopted by Defra to date is to look at a project holistically. There is likely to be a dramatic increase in the frequency of coastal landsliding as a result of climate change and the Coastal Group Chairmen would welcome a debate on this particular topic.

Question 10.6

Again, this could be considered as forming an extension of the data being captured by the Environment Agency for the National Flood and Coastal Defence Database (NFCDD).

Question 10.7

There should be no moving of this problem from one government department to another. If the resultant outcome of the problem is flooding, then it should sit within the Flood Management Division of Defra. It would appear that a further commission, to follow the scoping study, is required to understand the problem in more depth and before establishing which parties are best able to promote useful outcomes by way of a long-term agreement.

Question 10.8

No comments, the consultation appears to have already established that the Coal Authority is the responsible body for monitoring groundwater levels in mines, with the EA acting as enforcer should any actions be required.

Section 11 : Flooding of and from the transport network

Question 11.1, 11.2 and 11.3

We regard this as an important issue, particularly where highways are adjacent to the coast or pass through areas of coastal instability. Drainage from public highways should be part of an integrated drainage management system, particularly as concentrated flows can promote erosion and encourage ground instability. This philosophy is valid for both strategic and non-strategic roads, the issue being related not just to their strategic importance but also their proximity to the coast and the vulnerability of the ground conditions through which the road passes. Recent experiences in Cornwall suggest that the use of roads to move flood waters away, thereby hoping to avoid damage to properties, carries a high degree of risk.

Question 11.4

Again, whilst this is not specifically the responsibility of a coastal authority, it is worth noting that railway embankments were not designed as water retaining structures. The experience in East Anglia in the 1970s(?) during exceptional conditions suggests that these embankments are vulnerable. More recently a blocked culvert on the north Norfolk coast caused considerable build-up of water behind a railway embankment which led to extreme concern about the stability of that embankment. Had it failed it would have led to a considerable washout on the cliffs a few hundred metres to the north.

Section 12 : Managing flooding through flood resistance and resilient measures

Question 12.1

The Coastal Group Chairmen welcome the initiatives that have been put forward in relation to this subject.

Questions 12.2 and 12.3

No comments.

Section 13 : Raising awareness

This section appears to concentrate on raising awareness in relation to flooding. In our opinion it should also relate to coastal erosion and coastal instability problems. We have highlighted earlier in this response the need for better methods of dissemination of current and evolving thinking on coastal defence related issues. We believe this still remains a very high priority and

would urge the government to consider a much improved dissemination programme involving the operating authorities and the key agencies (Environment Agency and English Nature). The coastal group SCOPAC would welcome discussions on how their guide 'A non-technical guide to coastal defence' could be disseminated more widely.

Question 13.1

The information currently available on flood risk is comprehensive both from a non-technical point of view and in terms of GIS / map based information. The development of integrated risk maps covering all risks including erosion, flooding and landslip is essential. The Coastal Group Chairmen support the view that shoreline management plans are the most appropriate vehicles for managing coastal erosion and landslip risk and should provide advice to the statutory planning system taking account of planning policy guidance.

The Coastal Group Chairmen are disappointed in the comments made in paragraph 13.15 with respect to Coastal Groups which states that "individuals can also get involved at a local level through voluntary coastal groups, of which there are several based around England". We are concerned, first, that individual members of the public or others can become directly involved in Coastal Groups. In fact there is usually a fairly well-defined and restrictive membership comprising the Operating Authorities, the statutory consultees and other key stakeholders, rather than the public at large. In addition, we feel it should be pointed out that there are not "several based around England", there are in fact coastal groups covering the whole of the coastline of England and Wales, and this system has been in place for many years. We believe that the comments within this paragraph marginalize the vital role that Coastal Groups have played working with central government in terms of helping to implement coastal defence policy and helping to ensure that shoreline management plans and other initiatives have been very successfully introduced around our coast.

Questions 13.2 and 13.3

We understand that the Environment Agency is undertaking a publicity campaign to raise awareness for the new Flood Warning Areas, including leaflets and letters. The use of questionnaires / surveys to individual households may also be worth considering.

Question 13.4

We are very concerned that the recommendations of local authorities have not been taken on board with respect to the restructuring of the Flood Defence Committees; particularly in relation to the loss of democratic process and we believe that the new arrangement of flood defence committees are at too high and too strategic a level. We believe that the ability to make use of local knowledge will be lost and that there will be insufficient opportunity to discuss important issues within the scope of the new structure of flood defence committee meetings.

Section 14 : Flood warning systems and emergency responses

Question 14.1

Taking account of experiences from the East Anglian coast, which is particularly vulnerable to marine flooding events, we are aware that, since the 1953 floods, a considerable investment has been made in both flood defences and flood warning systems; both are regarded as essential. Any flood defence structure is vulnerable to breach or overtopping. The flood warning systems

that might exist to the rear of such a defence are an essential back stop. The justification for a flood defence scheme should be on the basis of the appropriate standards of defence and the appropriate appraisal as set out by Defra. There should be no adjustment to the scheme to take account of the presence or otherwise of a flood warning system. Whilst flood warning systems are far more effective than they have been in the past, nevertheless they seem to be more prone to failure than the front line defences. It would, therefore, be unwise to place a reliance on a flood warning system as an alternative to a flood defence structure.

In the light of recent flooding incidents (ie. Boscastle) should consideration be given to the formulation of 'Evacuation Plans'; particularly if government requirements to provide more housing land causes development to take place where flood warning systems are necessary?

Question 14.2

Generally the flood warning service performs well. It should be noted, however, that the recent transfer to the Environment Agency was not without its early problems and one authority at least opted out until such time as the new system showed itself to be reasonably effective. It should be noted that much of the effectiveness of the warnings at the local community level is reliant on a series of voluntary wardens. Increased funding in this area could be advantageous, although it should be recognised that it is in essence an 'insurance policy' that, for the most part, would be unused. We understand that the EA is working on narrowing the floodwatch telephone call system to focus still further on these areas at greatest risk.

Section 15 : Coastal issues

The Coastal Group Chairmen welcome the comprehensive and even-handed way in which issues relating to coastal flooding and erosion are set out in Section 15.

In paragraph 15.6 you advise that less than 100,000 properties, with a current estimated value of some £8 billion are in areas that, without protection, could be eroded in the next century. If the average value of a property in this country is £150,000 then the estimated value of coastal assets is understated. You compare this statistic with the fact that more than a million properties are at risk from sea and tidal flooding and these have an estimated capital value of £130 billion. You do not highlight the enormous value of property and assets, quite apart from environmentally important sites, that are currently protected by coast protection structures. In the south-east of England alone this would amount to many billions of pounds. In other words, we do not believe the first two sentences in paragraph 15.6 compare like for like.

In paragraph 15.7 you highlight the potential impacts of climate change on the coast. In our response we have referred to this earlier and taking account of the comments raised in the Foresight project we believe that the issue of coastal erosion is one that will grow very significantly over the next decades and that we should maintain the skills base and expertise for dealing with this within local authorities.

We welcome the reference to land instability (paragraph 15.10) within this context. Many operating authorities are grateful to Defra for the support they have offered in terms of addressing coastal erosion and ground instability schemes within the coastal zone. There has been a marked increase in the reactivation of relic coastal landslides as well as first time events in recent decades. There is no doubt that this trend will increase as a result of increased toe erosion of landslide systems and combined with higher ground water levels. For this reason we welcome the holistic approach being adopted to coastal and drainage issues in this paper.

We welcome the comment in paragraph 15.15 with respect to irreplaceable loss of land and property resulting from coastal erosion rather than the periodic inundation of assets which may result from flooding. You refer in the same paragraph to the fact that the timing and extent of coastal erosion and geotechnical instability problems on the coast are difficult to predict. We believe that monitoring techniques and the understanding of coastal instability is now becoming much more sophisticated and as a result much improved methods of forecasting are now available. The respective roles of coastal defences and drainage systems in terms of mitigating the effects of ground instability are also being increasingly understood and remedying these solutions can be addressed best by undertaking a coast protection and slope stabilisation scheme in a holistic way. Bearing in mind Defra is the lead government department for coast protection, the fact that many landslides are triggered by marine erosion and taking account of Defra's wider ICZM role it is logical that coastal landsliding should fall within Defra's remit.

Question 15.1

The most effective model for future delivery of the coast protection function is through the involvement of maritime district councils / unitary authorities as the operating authorities within an overarching framework providing a strategic dimension through the Regional Coastal Groups. A key issue for flood and coastal defence policy is sustainability and local authorities are assisting in this process currently in four ways. First, by leading most of the coastal groups supported by the Environment Agency, English Nature and other interested parties. Second, by leading the shoreline management plan initiative in most cases. Third, by informing the statutory planning process providing much improved information on coastal defence for colleagues in strategic planning and development control departments and, finally, by contributing substantially towards the cost of shoreline management plans and strategy studies. It should be noted that local authorities do of course undertake a very broad range of functions, many of which are inextricably linked with the coastal zone. These responsibilities range from planning to construction and maintenance of coastal highways and footpaths, to water quality, food safety, coastal defence itself in terms of new works, monitoring and studies of coastal processes, tourism, leisure and seafront amenities, emergency planning, oil spill response and addressing maritime incidences as well as offshore dredging.

Importantly also local authorities have a leading role to play in terms of economic regeneration of coastal towns, many of which require substantial investment and it is worth bearing in mind that seafront esplanades, seawalls and beaches are often the 'shop window' for that particular resort. Alongside all these functions local authorities are often major coastal landowners and have responsibility for all aspects of maintenance and public safety. Topics such as tourism, beach quality and use and coastal aesthetics are closely linked to the design and implementation of the full range of coastal defence measures (eg. seawalls, groynes, beach replenishment).

Question 15.2

We support strongly the continuation of the shoreline management plan process based upon a sub-division of the coastline into sediment cells and sub-cells. Arising from research commissioned by the Local Government Association and the coastal Group, SCOPAC, it is clearly evident that the SMP initiative is welcomed by a range of stakeholders including our development control and planning policy colleagues. Research commissioned by the Isle of Wight Centre for the Coastal Environment with financial support from the LIFE Programme, together with research undertaken as part of the European Union's EUrosion project, has demonstrated that the SMP process provides probably the leading mechanism in Europe for addressing shoreline management issues in a strategic and sustainable way.

It is clearly evident that local authorities are placing increasing reliance on shoreline management plans as a contribution to the planning process. Discussions with regional government also indicate the value and importance they place on SMPs. We look forward to a steady improvement and refinement of the SMP process, particularly taking account of Defra's updated guidance for Round Two SMPs. We would support a further review of the SMP process after 2008 when the second round of Plans has been completed.

Question 15.3

In terms of alternative or complementary models the preferred option of the Coastal Group Chairmen is 'status quo'. However, for at least ten years many local authorities have been working together within regional coastal groups allowing coastal defence issues to be addressed on a strategic basis.

The key roles of coastal groups are :

- to support the duties and responsibilities of member organisations relating to coastal defence and protection;
- to promote and co-ordinate regional strategic shoreline management objectives;
- to facilitate the commissioning, dissemination and application of research;
- to facilitate the communication of experience and best practice;
- to influence the development of regional, national and European policies and programmes relating to the coast;
- in addition coastal groups assist in the implementation of government policy by increasing the awareness of the need to deliver national and international statutory obligations as well as acting as a formal consultee on central government policy and guidance.

The Coastal Groups have a structure in place allowing them to meet at regular intervals collectively to discuss current and future coastal defence issues as well as meeting with the Institution of Civil Engineers, the Coastal Engineering Advisory Panel and Defra at the Coastal Defence Forum. It is important to recognise that Defra is placing increased reliance on the Coastal Groups in terms of service delivery, co-ordination and for example delivery of high level targets, capital programme monitoring and shoreline management strategy. We believe that the role and effectiveness of the Groups could be strengthened if it was possible for a lead authority within each Coastal Group to bid for funds from Defra to assist with their co-ordinating role. Perhaps this could be arranged in five year tranches similar to the application for funds for strategic monitoring.

In this context it should be noted that the House of Commons Agriculture Committee (1998) stated that "we warmly endorse the co-ordinating approach being adopted by Coastal Groups". The Committee also commented on the issue of whether centralisation of the coastal protection function would be an advantage and they stated that "were this to come about, there would also be considerable disadvantages in terms of political accountability, especially at a regional and local level". We do not believe the Coastal Group initiative would continue if the coastal protection function was removed from local authority control.

Numerous government publications are stressing the need for local authorities to play a pivotal role in the development of sustainable communities. Local authorities are urged to develop an holistic approach to the integration of environmental and economic needs in concert with their local communities and other agencies. In addition there is a growing national lobby towards the

special regard that should be given to rural communities and the fragility of rural economies. The importance of administering flood and coastal defence at a local level and its relationship with environmental stewardship and economic regeneration cannot be over-emphasised. Should the flood and coastal defence function be managed alternatively it is believed that the ability of local authorities to fulfil this role could greatly diminish with respect to co-ordination of plans for local sustainability.

Advice and publications by the government stresses the need for more local accountability and for greater local determination of priorities with an extended role for the local community in terms of developing local policies and priorities. Regional Development Agencies and greater partnership working between local authorities to deal with strategic planning issues strengthens the move away from central government control. A transfer of the coast protection authority to another body would remove from local authorities the ability to make decisions on coastal protection and to plan effectively for the coastal zone. However, links between local government and the Regions could be achieved effectively if co-ordinated by the Coastal Groups.

It is worth noting that in many cases local authorities involved with coast protection employ specialist staff to plan, design and supervise the construction of a range of coastal defence works. In some local authorities this is undertaken by in-house staff, whilst others provide a service by a mix of in-house staff and external consultants who can supply specialist knowledge or supplement in-house resources. This flexible working pattern ensures that good value for money is obtained whilst retaining a strong local knowledge and expertise. Local knowledge also supports long term coastal monitoring and maintenance programmes by ensuring that they are carried out effectively, efficiently and economically. The transfer of the coast protection function from local authorities to another agency would inevitably result in the dispersal or loss of local expertise. It is also arguable that a large agency would not be able to operate the flexible staffing arrangements achieved by the current maritime authorities who deal with a range of local authority coastal functions.

If the public have any confusion about who is undertaking the various roles in terms of flood and coastal defence they will nearly always turn in the first instance to the local authority as a point of contact. Those working in local authorities know that in times of storms or coastal flooding it is usually the local authority who provide the sand bags and the emergency response. Local authorities also have statutory powers for providing temporary defences, dealing with evacuation of property and caring for victims of flooding and other emergencies as well as clearing up after the event.

The government has placed increasing reliance upon coastal groups in terms of delivery of the flood and coastal defence function in recent years. For example a number of Defra high level targets require coastal groups to collate and provide returns. In the conclusions and recommendations of the House of Commons Agriculture Committee (1998) the Committee stated "we warmly endorse the co-ordinated approach to coastal management through coastal groups, and believe a more strategic approach could be taken to larger stretches of UK coastline if coastal groups were given statutory status and granted formal powers to assume the responsibilities and resources of their constituent local authorities in the sphere of coastal and sea defence policy".

"Membership of existing groups should be vetted to ensure they represent the full spectrum of stakeholder interest. Furthermore, they must work within the much more clearly defined set of national guidelines already mentioned. These guidelines should be reflected in the content of the shoreline and coastal management plans. Periodic monitoring of these plans should be undertaken by MAFF (now Defra) to ensure these guidelines are being observed and the national objectives are being furthered through action on the ground".

The ability of coastal groups to deliver the coastal defence function in a strategic way is demonstrated through the adoption of a regional approach in the south-east of England where the three coastal groups are co-ordinating the strategic monitoring programme which covers the coastline from Portland Bill to the Isle of Grain. This work programme will deliver, over the next five years, strategic monitoring to a uniform standard that will provide baseline information against which, for example, climate change impacts can be assessed. Similarly, operating authorities on the east coast of England between the River Humber and the River Thames jointly commissioned, through their regional coastal group, the North Sea Sediment Transport Study; similar initiatives are being developed in the north-west of England. This substantial R&D project will also contribute to the production of the second generation of shoreline management plans. Further issues are being investigated and delivered strategically by coastal groups such as procurement of beach replenishment materials in the south-east of England.

In terms of integration of flood and coastal protection responsibilities, whilst it is possible for flood defence to be managed on a catchment basis, this is not a suitable basis for the coast protection function and there are strong arguments for the existing arrangements for coast protection to continue. It is vital that the good work undertaken jointly by Defra and the Coastal Groups together with the Environment Agency in the establishment of coastal cells and our improved understanding of coastal evolution and sedimentary process is maintained for the future. Effective liaison exists between the Environment Agency and coast protection authorities through such initiatives as the Joint Local Government Association – Environment Agency Protocol and the collaboration during the preparation of shoreline management plans and coastal defence strategy studies.

It is important to recognise that local authority staff have their own particular skills and areas of expertise. In particular local authorities are attuned to the needs of the local community and the requirement to integrate coastal defence with all the other local authority coastal functions. It is, therefore, recommended that the existing arrangements should continue with the coastal groups assisting by continuing to provide an overarching, strategic responsibility for coast protection on a sub-regional basis based upon coastal cells. The Coastal Groups role is further enhanced through regular meetings with their Regional Engineers to assist in exchange of information and dissemination of government advice and policy.

Question 15.4

As stated at the beginning of this letter, we strongly believe that the involvement of Defra as the lead government department for implementing the EU Recommendation on ICZM provides a real opportunity for successful implementation of this process which must not be missed. We believe that a top-down, bottom-up approach for ICZM is most desirable with assistance from central government both in policy and financial terms allowing sub-Regional groups and coastal fora to develop integrated coastal zone management in their regions. We are aware of the process that is being followed by Member States in compliance with the EU Recommendation and we continue to await the results of this with great interest. The Coastal Group Chairmen are being informed of progress on ICZM by the European Commission through our various European networks and groups and directly by DG Environment.

With respect to better integration between the statutory planning system, local development plans and shoreline management, a study commissioned by the Local Government Association is contributing towards this process. It is vital for planning to be included as part of the shoreline management process because coastal defence authorities and agencies are not empowered to control new development which may be at risk on the coast. It is now recognised that planning, as the gatekeeper of development, and coastal defence authorities and agencies, as experts in

risk, must work together as neither hold sufficient power to resolve the issue of risk management alone.

We believe that there are many opportunities for cross-representation in shoreline management and development planning processes to help develop a sense of joint ownership of coastal risk management. It is essential that local planning authority forward planning teams are adequately aware of relevant shoreline management objectives and options and have an appropriate understanding of this information received from engineers. Shoreline managers and shoreline management plans can assist planners in the development of policy frameworks to reduce risk in coastal zones. Coastal Groups also facilitate networking between the two communities of coastal engineers and planners by inviting planners to participate in such groups which would not only benefit the planners but would also enable engineers to develop their knowledge and awareness.

Coastal risk is an increasingly important issue which affects future development and land use at regional level, particularly in relation to major redevelopment and regeneration areas which are now low-lying. SMPs provide a major source of information for such policy. Bringing the two together allowing scientific and technological information to inform regional spatial policy. Regional spatial strategies, then, provide an opportunity for public examination of resulting policy. Additionally, SMPs operate over strategic scales associated with natural processes. There may be compatibility with the sub-regional planning scale or opportunities to develop sub-regional plans relating to coastal areas and based on natural process areas.

SMP policy is important in allocating land for development and establishing policies on which development may, or may not, take place. The more flexible approach of the new system means that such documents or parts of documents may be incorporated as part of a local development framework either as core or supporting policy or they may be adopted as a local development document in their own right. Some authorities are proposing to incorporate SMP policy as core policy.

It is important to recognise that local planning authorities cannot develop their policies for development subject to coastal risk alone. They must collaborate locally with other bodies, notably the Environment Agency, coast protection authorities and levels of government at a regional and national level. Planners and those preparing SMPs share the responsibility for safeguarding people and property from risk. Establishing the best options for future shorelines requires an understanding of economic and social objectives and knowing where future development will take place. It is hoped that many of these issues can be taken forward as part of the Round Two SMP process.

With respect to the relationship between shoreline management plans and the Water Framework Directive, whilst it can be argued that catchments form a sound basis for consideration of fluvial issues, there does not appear to be any logic in coast protection being managed on a catchment basis. For many years Defra have underpinned their coastal policy on an understanding of natural coastal processes based upon sediment cells. Only recently the major study commissioned by Defra (Futurecoast) was completed to further our understanding of natural coastal processes, geomorphology and coastal evolution. Based on the sub-division of the coastline into cells and sub-cells coastal groups were established by forward-thinking local authorities to address flood and coastal defence issues on the basis of natural systems. Catchments do not coincide with coastal cell boundaries and it would be a retrograde step to forsake this scientifically-sound basis for managing coastal defence for reasons of administrative convenience by including them within a catchment-based framework.

Section 16 : Funding Issues

Question 16.1

We have no additional comments on the issue of funding over and above those provided in our response to the funding review (2002). However, in view of the recent experience of West Dorset District Council and others with respect to under-recovery on coast protection schemes we welcome the increased co-ordination between Defra, ODPM and the Treasury. The recent letter from Defra that indicated that grant levels up to 100% could be given in certain justified cases is also welcomed.

Question 16.2

In our relatively limited experience of this topic we believe that business, like individuals, take the view that they should not be asked to pay an additional sum to provide (or enhance) a service that they are of the view should be provided from the Council Tax / Non-Domestic Rate. Flood and coast defence has long been seen as something to be provided by the public authorities for the benefit of the community as a whole. More recently that role has been taken (at least in terms of funding) by central government. Introduction of BIDs could be seen as a move by central government away from centralised funding of flood and coast defence. Any role for BIDs, therefore, should be seen as additional to rather than a substitute for publicly funded flood and coast defence. There is a wider concern to ensure that the coastal defence service continues to benefit from central government funding, particularly in those areas affected by economic deprivation.

Question 16.3

No comments.

Section 17 : Review of the Coast Protection Act

Our general view is that the Coast Protection Act has served us very well over the last fifty years or so and it's quite broad remit has allowed the development of new ideas and policies to be developed within this legislation. However, if consideration is being given to the review of the Act, it is important to assess how this fits within any wider legislation that may be forthcoming. I am thinking in particular of any legislation that may arise from the EU Recommendation on the integrated management of coastal zones and from a Marine Bill. With respect to the EU Recommendation, as you are aware, the European Commission will be receiving a progress report from all Member States on how they have implemented effective ICZM by 2006. On receipt of this information the European Commission will decide whether they are satisfied with progress or whether a Directive should be implemented. This decision will be made within ten months. As the lead government department for implementing ICZM we are very interested on how Defra view their approach to this topic and how it relates to coast protection and other coastal management functions.

We need to be satisfied that, if the Coast Protection Act is to be retained, it can accommodate existing and future proposals for management of coastal risks. For example, should a greater role develop for the Regional Coastal Groups, can this be accommodated within the existing legislation? There may be scope for addressing some of the issues described below within an updated version of the Memorandum.

In view of the impacts of climate change on both coastal developments and European sites of environmental importance the question of compensation is likely to be considered more

thoroughly in the future. We need to consider whether compensation issues can be addressed within the existing legislative framework.

A further question is whether the permissive powers that are provided under the Act are sufficient, bearing in mind the increased severity of climatic conditions predicted for the future or whether some more rigorous legislation is in fact required that will ensure that Operating Authorities do fulfil their statutory requirements in terms of mitigating risk. We believe the nature of works of maintenance or repair need clarification and the applicability of compulsory purchase powers ought to be amended to include both land adjacent to but not abutting the shoreline and indeed land at estuarine locations but landward of the Schedule IV boundary.

The consents section requires strengthening to include a requirement for planning authorities to refer relevant applications and sections 25 / 26 need strengthening to include the right of access for the purposes of survey, testing, etc. and have facilities to prove ownership or after due procedure to assume ownership for the purpose of carrying out a scheme.

Any revision of the legislation should allow for complete clarity of function, purpose and process and offer a streamlining of government involvement with particular reference to the Secretary of State involvement and inter-departmental contribution. Similarly there should be more synergy between any further legislation and the Habitats Directive.

Section 18 : High-Level Targets for Flood and Coastal Erosion Risk Management

The Coastal Group Chairmen are very pleased that Defra is considering updating the high-level targets. These targets are one of a number of measures that can be used by local authorities to help assess their performance and we are anxious to be involved in this process and to demonstrate a high standard of achievement in the coastal defence field.

We support the retention of the Policy Statement (target 1) and also the on-going provision of information to the Environment Agency in partnership with the Operating Authorities in order to populate the national flood and coastal defence database. Clearly, we still have anxieties about the database and its ability to accommodate, satisfactorily, the coastal protection related information.

We believe the target for completion of shoreline management plans by 2010 is realistic and we are, as you know, very anxious to start work on the Round Two Plans as soon as the Defra guidance is available.

With respect to target 4 (bio-diversity), we are unsure whether target a (ensuring no net loss to habitats) is actually achievable. We believe that further research is required into this particular target and we believe that, at this stage, the wording should be amended to 'aim to ensure ...'. I can confirm that Operating Authorities are very anxious to work jointly with the Environment Agency on seeking to fulfil the various tasks under target 4.

We believe that target 5 is very important and problems arising from certain planning applications relating to coastal erosion risk will help gain a national picture of how successfully sustainable policies are being introduced. In other words, we hope this will demonstrate how risk is being avoided through the incorporation of SMP recommendations into the statutory planning system. We very much hope that the work undertaken jointly by the University of Cardiff and the Isle of Wight Centre for the Coastal Environment on behalf of the Local Government Association Coastal Special Interests Group on the subject of 'Managing coastal risk' will help this process. We do not have any comments on target 6.

I do hope you find these additional comments helpful and we will of course be very pleased to discuss our response at the Coastal Defence Forum or at a separate meeting.

Yours sincerely

Dr Robin McInnes
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IW Centre for the Coastal Environment
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