

Introduction

Welcome to the second edition of the Chairman's monthly coastal highlights. Well my intentions to publish this at the end of each month have proved more difficult than I thought however I am going to persevere. I am keen to ensure that whatever is happening on the coast around the country is shared. I was unable to meet my own end of June deadline so I've combined the June and July issues as one. As previously highlighted I feel the back bone of any good network is good communication and understanding hence these updates. I would like you all to contribute to these so let me have your feedback and any content that you would like circulated.

Welcomes and Goodbyes

Following a productive catch up meeting with Rachael recruitment of a replacement for Andy Shore is progressing well but at the time of writing I have no news of who we will be working with in the future but watch this space....

What's Changed/Changing

Bill Parker has now left his substantive role at Coastal Partnership East and his role as the lead Officer to the LGA SOG. As agreed at the last full meeting I did send Bill our best wishes for the future and he has since contacted me and thanked us for our good wishes and that at the time he was still pondering what he is going to be doing next. If you need to contact him he has given me his details so just ask.

Bill's replacement at Coastal Partnership East is Karen Thomas but as yet his former role on the SOG has yet to be determined but elections and appointments will underway during June/July.

Standing Requests:

As changes of staff are inevitable, as Chairs, please can you ensure that my name remains on your circulation lists so I can see when the meetings are and what is happening.

(Bryan.curtis@hotmail.co.uk)

National FCERM Stakeholder Forum Update July 2019 Issued 19/07/2019 and details circulated.

Coastal Group Meetings attended by the Chairman:

None during May and June.

NECG AGM 3 and 4th July 2019 by kind invitation of Stewart Rowe. Planning to be attending the NWCG meeting 20th August 2019 subject to confirmation and venue.

Governance Matters

At our last meeting the minutes quote "RH Confirmed that costs for strategic work at RFCC are recoverable" which I didn't pick up when I reviewed them but as Rachael wasn't with us she couldn't have agreed this. I have since contacted Rachael and she advised quote "To confirm we will cover expenses for coastal group chairs since we feel it is very important that coastal chairs do attend RFCC meetings. An update to the terms of reference will be needed". I have agreed to action the changes to the Terms of Reference.

Actions and follow ups from previous meetings

Catherine Wright has followed up her action from the last meeting and asked me to let you know that the EA written evidence to the Efra Committee has been published and is online. It is available here: <https://www.parliament.uk/business/committees/committees-a-z/commons-select/environment-food-and-rural-affairs-committee/inquiries/parliament-2017/coastal-flooding-and-adaptation-to-climate-change-17-19/publications/>

Substitutions

Coastal Resilience Workshop in London on 10th May 2019 - Following my request for a substitute to attend this regrettably I didn't get anyone because regional events will be run as well. I have however

managed to get Helen Jay from the SMP-R team to attend to back up Nick Hardiman who was also been invited so we will be well covered with respect to the coast. I attended one of the regional events at Havant along with (LC) on 21st June 2019.

CIWEM Rivers and Coastal Group on 5th June 2019 - Regrettably I didn't manage to secure a substitute but have dealt with as much as I can by correspondence.

FCERM Strategy Ambition 2 Today's growth and infrastructure – resilient to tomorrow's climate 4th September 2019 TBC Carl Green covering on behalf of the CGN

FCERM Strategy Ambition 3 A nation of climate champions, able to adapt to flooding and coastal change through innovation 5th September 2019 TBC

Consultations

The new FCERM Strategy Consultation was still open and due to close on 4th July 2019.

Consultation period 8 weeks from 9th May to 4th July 2019.

You can view the consultation documents and questions online on the consultation pages:

(<https://consult.environment-agency.gov.uk/fcrm/national-strategy-public>)

A draft response was circulated during June for comment so thanks to all for your feedback. The final version has been appended to the end of this update.

Call for evidence on flood and coastal erosion Defra

Details of the government's request for evidence on a number of flood and coastal erosion risk management policy issues through a call for evidence that was been launched on 8th July 2019 have been circulated.

In the 25 Year Environment Plan, government has set as its priority to "reduce the risk of harm to people, the environment and the economy from natural hazards including flooding and coastal erosion". To better achieve this, the government would like additional evidence on some key flood and coast policy issues addressed in this call for evidence.

The responses will be used to inform a government policy statement on flood and coastal erosion risk management to be published by the end of 2019.

For detail click [here](#) to access the call for evidence.

I am preparing some draft notes as a basis for a CGN response but any help would be appreciated.

Proposals – The proposal for **engineering guidelines for coastal practitioners and managers** (focused on nature-based engineering approaches/funding mechanisms/examples etc.) didn't get any support which is regrettable but I still feel that it is important so will be trying as best I can to work with this up into a more attractive option.

Flood and Coast Conference 2019 – I attended the middle day of the event and was pleased to see so much of a buzz around the halls and exhibition centre. This day seemed to have the most coastal content and enabled me to attend the LGA events as well. Having speakers from overseas and the television was a bonus and clearly a draw. Not seeing Nick Crane from the "Coast" programme with his umbrella was however a disappointment.

Alison Baptiste CBE in her new role gave a good presentation and the message "think the unthinkable" came out loud and clear.

R and D:

Ciria Groynes in Coastal Engineering (Guide to design, monitoring and maintenance of narrow footprint groynes) I was able to provide further comments on the 3rd draft of this which were significant and I doubt the anticipated publication date will have to be postponed.

Transitions to a lower risk: Working with SMPs to adapt the coast in changing future. (Second of 3 events - London, Havant and York)

This was the CGN supported R and D being undertaken by Robert Nichols and team at Southampton University. Whilst the outcome of the research may be of significant use to use in due course the most overriding feedback from this event was the general misunderstandings and use of

SMPs by the Planning profession. It made me realise the enormity of the problem that we may face when we start to engage on the SMP's.

Understanding effective flood and coastal erosion risk governance in England & Wales

I assisted following discussions with Stewart some research being undertaken for Defra and the Agency by Flood Hazards Research Centre regarding the current governance arrangements brief details as follows:

The governance of flood and coastal erosion risk is complex. Public bodies, private organisations and community groups all play a role. Flooding and coastal erosion impact homes, businesses, health, transport, utilities and the environment. A broad approach bringing together multiple actors and agendas is therefore required.

Advances in partnership working, designing multi-benefit projects and operating at a catchment scale have demonstrated some successes. However, challenges around defining the responsibilities of different authorities, balancing national and local priorities and joining up policy areas remain.

This project aims to address these challenges, drawing on lessons learnt from considering local and national approaches to managing flood and coastal erosion risk. It will also build on and provide evidence to support the development and implementation of:

- The new FCERM strategy for England and new FCERM strategy in Wales
- Defra's upcoming policy statement
- The 25 Year Environment Plan

Objectives:

1. Examine the current framework for flood and coastal erosion risk governance in England and Wales, identifying the roles, responsibilities and functions of different types of risk management authorities.

For this we will review literature, policy and practice to establish the structure and effectiveness of national governance. This will include creating an analysis framework, seeking insight from national stakeholders and exploring the definition of 'strategic oversight/overview'.

2. Describe and learn from innovative local practices within flood and coastal erosion risk management and aligned sectors, appraising their governance approaches.

We will work with four locations in England and Wales to understand local governance in different contexts. The case studies will provide insight into efforts to;

- Implement successful catchment or place-based approaches;
- Deliver multi-benefits;
- Broadening the range of actors involved and facilitating collaborative partnerships;
- Address adaptation challenges in the face of climate and coastal change.

Final outputs will be shared when I get them.

SMP – R

As you are all aware this work is now underway and following our first two TAGs progress is fast but we still have a long way to go. It has been agreed that good communication is essential so a newsletter will be produced soon.

I do however recommend that you start assembling the SMP leads in your areas and, if you haven't already done so, start to think about the contacts that you think would be best to contact regarding the refresh paying particular interest to Planners. To help with this we have agreed that a joint letter from the Agency and each CG Chair may be a good way of demonstrating the importance of this within each Council and so getting the right level of buy-in.

Clearly in future months this will become more of a priority item but for now I await the official newsletter.

Modernising Appraisal Workshops

I attended the last of the 3 internal workshops to help understand how the Agency can modernise the existing guidance documentation and training, and make it fit for the future. Further LA workshops are to follow in September and will be geared to those that prepare schemes and business cases. More details to follow when I get it.

New GovUK links and updates for the coast or possibly affecting the coast -

GOVUK@public.govdelivery.com excluding those for the Thames Barrier for June and July 2019 - including date, time and brief summary of content:

- [Saltfleet to Gibraltar Point Strategy consultation](#)

Views are sought on a new vision for the future of flood risk management between Saltfleet and Gibraltar Point on the Lincolnshire coast 3:21pm, 4 June 2019: Change of address in consultation advert where consultation documents can be inspected.

- [Exmouth tidal defence scheme exhibition – save the date](#)

Learn how 1,800 properties will have their flood risk cut at the drop-in exhibition on 28 June 2019. 2:43pm, 17 June 2019: First published.

- [Flood Action Campaign 2019](#)

A national annual flood awareness campaign to encourage people to know what to do to protect themselves and their property in a flood. 3:28pm, 17 June 2019: First published.

- [Flood risk management plans: Strategic Environmental Assessments advertisement](#)

The Environment Agency will be carrying out Strategic Environmental Assessments for the review of flood risk management plans. 4:02pm, 17 June 2019: First published.

- [Not drowning but waving: making the climate emergency a global opportunity](#)

Speech by Sir James Bevan, Chief Executive, Environment Agency Flood and Coast Conference, Telford International Centre, 18 June 2019 10:39am, 18 June 2019: First published.

- [Climate change tops agenda at Flood and Coast Conference 2019](#)

The fourth Flood and Coast Conference opened in Telford today. 11:22am, 18 June 2019: First published.

- [Exmouth tidal defence scheme](#)

What the Environment Agency, working in partnership with East Devon District Council, is doing to reduce flood risk in Exmouth, East Devon. 8:38am, 19 June 2019: Latest news updated with date of public drop in event.

- [Arundel tidal defence scheme](#)

How the Environment Agency is working to reduce flood risk in Arundel. 11:07am, 20 June 2019: Updates made to scheme on 20 June 2019.

- [Flood risk management plans \(FRMPs\): how to prepare them](#)

Guidance for the Environment Agency and lead local flood authorities to prepare FRMPs. 1:42pm, 28 June 2019: Consolidated and simplified guidance for the Environment Agency and LLFAs as preparation of FRMPs is no longer a new responsibility but an established activity.

- [Flood risk management plans \(FRMPs\)](#)

Approach, responsibilities and guidance to complete flood risk management plans. 1:42pm, 28 June 2019: Consolidated and simplified guidance for the Environment Agency and LLFAs as preparation of FRMPs is no longer a new responsibility but an established activity.

[£67m Ipswich Tidal Flood Barrier wins top engineering award](#)

The Ipswich Tidal Flood Barrier has won a top award from the leading international engineering institution. Time updated 4:35pm, 5 July 2019

- [Flood and coastal erosion: call for evidence](#)

We're seeking evidence on key flood and coastal issues to help develop a flood and coastal erosion and national infrastructure strategy. Time updated 10:12am, 8 July 2019

- [Check if you need an environmental permit](#)

Permits for installations, medium combustion plant, specified generator, waste or mining waste operations, water discharge or groundwater activities, or work on or near a main river or sea defence. Change made added the requirement for medium combustion plant and specified generators. Time updated 12:15am, 15 July 2019

- [£2.9 million extra funding to boost action on making homes more resilient to floods](#)

Extra funding will support three projects to increase flood resilience. Time updated 4:59pm, 22 July 2019

- [Flood and coastal erosion risk management annual report](#)

A summary of flood and coastal erosion risk management work carried out by risk management authorities in England. Change made 2018 annual FCERM report added. Time updated 11:00am, 30 July 2019

Partner liaison feedback/links/updates/actions:

- Institution of Civil Engineers (ICE) Maritime Expert Panel – ICE Coastal Conference 2019 24th to 26th September 2019 La Rochelle.
 - The majority of the papers and posters have been reviewed and the penultimate draft of the programme and speakers prepared.
 - 23rd September 2019 Young graduates and engineers event – Details sent. Dead line for expressions of interest 12th August 2019.
- CIWEM Rivers and Coastal Group –
 - Apologies sent as I couldn't secure a substitute.

- Young Persons Weekend 21st to 23rd June 2019 Delft, Netherlands. Feedback to follow. <https://www.ciwem.org/events/rivers-and-coastal-group-study-weekend-2019>
- FCERM Technical Advisers Group Flooding and Resilience – No meeting in June or July
- Coastal Research Steering Group (MJ Covering this)
- Appraisal Technical Group – No meeting during June.
- LGA SIG – The AGM at the Flood and Coast 2019 which incorporated a workshop was a success but probably not the best of venues and choices as there was limited member attendance. SIGSOG meeting planned for 8th August 2019 cancelled. Field trip dates to Allerdale 17th to 19th September 2019.
- RFCC Chairs – Stewart Rowe helped shape the RFCC Chairs 2 day field trip in Yorkshire which was reported as a resounding success.
 - The next meeting we hope that updates on the NNRCMP with a request for support for the next bid, SMP-R and Asset Maintenance.
- Coastal Representatives – We need to consider when we next have a face to face meeting with the RFCC Coastal Representatives.
- Stakeholder Forum – No dates for the next forum have been issued yet for the spring/summer or Autumn/Winter meetings. July updated circulated.
- CIRIA – Water Panel No meetings during June and July but I attended an Editorial meeting of the Ciria Groynes in Coastal Engineering (Guide to design, monitoring and maintenance of narrow footprint groynes) and provided input and further guidance. It is clear to me that whatever is published will never cover everything that these idiosyncratic structures require and there will be room for continued updates. I have asked that Ciria consider this as an active way forward and not deal with updates as they currently do every 10 years or so. We are the practitioners and use these guides so we need to try and ensure we share our best practice.
- MMO – No meeting in June and July.

Events: Schedule of past and future coastal workshops and events which the CGN may have been represented or be interested in (this is not a definitive list):

Past (June and July 2019)

- FCERM Strategy Consultation Workshop, London 3rd June 2019 (BC)
- CIRIA Water Panel, London 4th June 2019 (BC)
- CIWEM RCG, Birmingham 5th June 2019 (No CGN rep)
- Flood and Coast Conference 2019, Telford 18th to 20th June 2019 (BC, CG, SR and MJ)
- LGA SIG during Flood and Coast Conference 19th June 2019 (BC)
- NCMP Strategic Board Teleconference 2nd July 2019 (Mins to be circ'd) (BC, JC, SR, JB)
- NECG AGM and Field Trip Scarborough 3rd and 4th July 2019 (BC and SR)
- National Appraisal Technical Group TBC 9th July 2019 (BC)
- SMP R TAG London 10th July 2019 (BC, JB and JC)
- CIWEM AGM, Bath 11th July 2019 (?)
- SMP Refresh: Planning Focus Group Meeting, London 18th July 2019 (Andy Smith as a RFCC Coastal Representative)
- ICE Maritime Panel Telcon 18th July 2019 (BC)
- Coastal Assets Telcon 22nd July 2019 (BC) (Notes to be circ'd)
- Modernising Appraisal Workshop Birmingham 24th July 2019 (BC)

Future (August to December 2019) in brackets after event who is representing the CGN

- SMP Refresh: Adaptation Focus Group Meeting, London 1st August 2019 (BC and Andy Smith as a RFCC Coastal Representative)
- ~~LGA SIG SOG London 8th August 2019 – Cancelled~~
- SMP Refresh: Protect Sites Focus Group, London 7th August 2019 (MJ)
- SMP Refresh: Funding Focus Group Meeting, London 12th August 2019 (BC)
- FCERM Strategy Ambition 1 Climate resilient places 3rd September 2019 Birmingham (BC)
- FCERM Strategy Ambition 2 Today's growth and infrastructure – resilient to tomorrow's climate 4th September 2019 Birmingham (CG)
- FCERM Strategy Ambition 3 A nation of climate champions, able to adapt to flooding and coastal change through innovation 5th September 2019 Birmingham
- National NCPMS Appraiser Technical Group, TBC 10th September 2019 (BC)
- CIWEM RCG London, 17th September 2019 (BC)

- ICE Coastal Management Conference, LA Rochelle 24th to 26th September 2019 (BC)
- RFCC Chairs, TBC 27th September 2019
- Modernising Appraisal Workshops dates and venue TBC LA input desired (TBC)
- SMP Review meeting for all the SMPs dates venues TBC (TBC)
- NNRCMP Strategic Board, Southampton 9th October 2019 (BC, SR, JC, JB)
- Southeast Annual Partners Meeting, Southampton 10th October 2019 (BC)
- RFCC Chairs, TBC 5th December 2019

Useful Contacts:

RFCC Chairs and Coastal Representatives-

Brian Stewart OBE (Appointed 180102) RFCC Chair – Anglian Central
brianw19@btopenworld.com

Ian Devereux RFCC Coastal Member – Anglian Central i.devereux@btinternet.com

Paul Hayden (Appointed 09/01/2018) RFCC Chair – Anglian Eastern
phayden38@hotmail.com

Andy Smith RFCC Coastal Member – Anglian Eastern andy@the-porch.org.uk

Eddy Poll (1 July 2018 until 30 June 2021) RFCC Chair Anglian Northern
pollshouse@btinternet.com

Dick Thomas RFCC Coastal Member - East Anglia North Richard@rthomas.force9.co.uk

Adrian Lythgo RFCC Chair North West AdrianLRFCC@gmail.com

Carl Green (North-West Coastal Group Chair temporarily covering this role) cgreen@wyrebc.gov.uk

Phil Rothwell RFCC Chair – Northumbria pkrothwell@outlook.com

John Riby RFCC Coastal Member – Northumbria jriby@outlook.com

Shirel Stedman (Appointed 09/01/2018) RFCC Chair – Severn and Wye
Shirel.Stedman@rhdhv.com

Peter Jones RFCC Coastal Representative pjones147118@gmail.com

Anne Fraser RFCC Coastal Representative anne_secretary@hotmail.com

Philip Rees Chair – South West RFCC su4534@eclipse.co.uk

John Cocker RFCC Coastal Processes Member – South West john.cocker@teignbridge.gov.uk

Vij Randeniya (2018 until 30 June 2021) RFCC Chair – Severn and Trent
vij.randeniya1919@gmail.com

Jim Hutchinson RFCC Coastal Member jim.hutchison@balfourbeatty.com

David Jenkins (1 July 2018 until 30 June 2021) RFCC Chair - Wessex

Jenkins@bucklersbid.co.uk

Helen Mann Coastal Processes (1 April 2019 to 31/03/2022) helljmann@gmail.com

Colin Mellors RFCC Chair - Yorkshire and Humber colin.mellors@york.ac.uk

John Riby RFCC Coastal Member – Yorkshire and Humber jriby@outlook.com

Coastal Group Chairmen-

Stewart Rowe (SR) North-East Coastal Group Chair Stewart.rowe@scarborough.gov.uk

Mark Johnson (MJ) East Anglia Coastal Group Chair mark.johnson@environment-agency.gov.uk

Bryan Curtis (BC) South East Coastal Group Chair Bryan.Curtis@hotmail.co.uk

Lyall Cairns (LC) Southern Coastal Group Chair Lvall.Cairns@havant.gov.uk

John Cocker (JC) South-West Coastal Group Chair john.cocker@teignbridge.gov.uk

John Buttivant (JB) Severn Estuary Coastal Group Chair john.buttivant@environment-agency.gov.uk

Clive Moon (CM) Swansea Carmarthen Bay Coastal Group Chair crmoon@valeofglamorgan.gov.uk

Emlyn Jones (EJ) Chair of Cardigan Bay Coastal Group emlynjones@gwynedd.llyw.cymru

Carl Green (CG) North-West and North Wales Coastal Group Chair cgreen@wyrebc.gov.uk

CGN FCERM Strategy Response:

Date - as email

Dear Sirs,

Re: Draft National Flood and Coastal Erosion Risk Management Strategy for England

Thank you for the opportunity to respond on this important consultation.

As you will be aware Coastal Group Network (CGN) was formed late in 2008 as part of the Environment Agency's (EA) Strategic Overview at the request of the Department for Environment, Food and Rural Affairs (Defra) with a broad remit, part of which is to influence national level policy and implementation. We have no statutory or executive function but represent a broad stakeholder/partner base around the coastline of England and Wales and have been actively involved in many of the working groups etc. developing this draft strategy.

The Environment Agency should be applauded for tackling some very real challenges that the Country faces. The inclusion of case studies of successful adaptation on the coast are particularly welcomed e.g. Happisburgh. Similarly it is pleasing to see the theme of adaptation and resilience running through the draft strategy. The unanimous concern of all the Coastal Group Chairmen is that unless funding for this, through new or amended grant rules is forthcoming, none of these desired adaptive responses will be deliverable.

The CGN would like to be included in any further discussion and consultation on this work and would be eager to be involved in the development of the action plan that will no doubt follow.

This response should be read in conjunction with other key consultation responses that have been prepared across the Industry especially those from:

- Local Government Association (LGA) and the LGA Special Interest Group – Coastal Issues
- Individual Coastal Groups, Coastal Partnerships/Forums and individual Councils
- Professional Institutions such as the ICE (Maritime Panel) and CIWEM (Rivers and Coastal Group)
- Technical Advisors Group
- Regional Flood and Coastal Committees

We welcome the publication of the consultation and the chance to be able to influence this issue although we acknowledge that our input will be limited. In the main we will focus our response on coastal issues only and leave other organisations with more involvement and expertise to comment further on the other issues. A separate response to your questions has been made and appended

General Comments

Generally, we believe that the direction of travel is right and we support the draft strategy. However, *there are some issues of clarity which concern us.*

Our first concern is that to achieve the level of change required across the sector in order to deliver the ambitious vision and to help the Government in delivering its' future aspirations including:

- Tackling carbon emissions and our role as a sector in assisting with the UKs net zero pledge by 2050.
- Providing information "a common truth" about the risk of changes to the places in which we live and enjoy so decision makers and communities can make informed decisions and take timely action.
- Providing a range of measures to adapt (over long timeframes) to the increasing likelihood of flooding and coastal erosion, which are affordable, sustainable and link to the wider place based challenges.

Cross cutting agreements between several Government departments will be required. To be successful the strategy needs to influence Planning Policy, Building Regulations and Civil Contingencies to name but a few. It is therefore not just a challenge to influence the delayed Department for Environment, Food and Rural Affairs (Defra) future Policy Statement. It needs to be

adopted across wider Government and it is not clear how this can be achieved in the strategy as it stands.

There is a previous strategy in existence, yet there is little reference to how this was delivered/performed. The proposed draft strategy highlights a change in both language and direction. It would be useful to include some content to highlight the reasons for the changed approach. We would suggest that key milestones are considered to help evaluate whether the strategy is being successfully delivered.

The language of the strategy varies throughout from being directive to aspirational. Phrases like “will be” swing to “will work towards” and thus dilute the resolve of the Agency and Government as to whether this will be something that can be delivered.

This is a draft strategy for flood and coastal risk management (ref. FWMA 2010) yet the vision talks of coastal change and not erosion. Whilst we understand the narrowness of the term “erosion” and the need to make this more appropriate to what we should be doing in the future, we have to be mindful of what legislation enables us to do now, as we haven’t found any proposals for immediate change in legislation. There are parts of the draft strategy where “erosion” should have been used instead of “coastal change” which would have made it much clearer. We would be willing to help with this in any future changes.

From the glossary the phrase “Coastal Change” refers to the risks of coastal erosion and sea flooding yet is often preceded by “flooding” which appears unnecessary and confusing. Trying to cover both flooding from all sources and erosion risks in one strategy is always going to be difficult so we suggest you don’t make it harder and keep focused on what we have legislation to deal with. The FWMA 2010 and Coastal Protection Act 1949 are quite clear.

The draft strategy (page 7) references the original National Flood and Coastal Erosion Risk Management Strategy for England incorrectly by substituting the word “erosion” with “change”. This may have occurred throughout which we feel does not help clarity.

Flooding and erosion are specific and well understood. Future coastal change is a conscious decision that Government and society, take by either one or a combination of the following:

- not doing anything,
- protecting or
- adapting.

Regarding the latter there is a strong “adapt” thread running through the strategy which we fully support. However there is not an equally strong mechanism or policy for how to do or fund it. We acknowledge that by good engineering, re-engineering and innovation it may ultimately be delivered but to avoid future criticism the mechanisms for this should be integral to this draft. Many of the Defra Pathfinder pilots highlighted that adaptation is feasible but they cannot be delivered without some financial investment.

We acknowledge the desire to promote climate resilient places but we are concerned how and what resilience means at the coast. Regrettably the glossary highlights what resilient places will look like for fluvial or surface water solutions where it implies maintaining defences, new defences, catchment solutions and natural flood management but no solutions that are recognisable as something that we could use at the coast. It is clear that the focus of the authors were not on the coast.

The long-term investment scenarios highlight that significant long-term investment resource problems for mitigating and adapting to future flooding and coastal impacts. What is not included is any indication of how this funding gap will be met, by when and by whom. We believe that a step change in climate change will occur in the short term and thus collectively we will need accelerated investment yet we don’t know how this will be apportioned and how we will play our part in making places more resilient.

Government growth/housing targets are highlighted within the draft strategy and there is the implication that development within flood risk zones may well happen which would be contrary to other Government guidance on development in the flood risk areas. Some clarity on this is needed specifically at the coast which can input into, or be, an addendum to the ongoing refresh of all the English Shoreline Management Plans (SMP) to guide future Planning decisions. As the original second generation SMP’s are over 15 years old there are concerns that they are no longer considered current by some Planning Authorities and hence may not be material considerations when looking at future development or redevelopment on the coast.

We are disappointed that there is no support for the National Network of Regional Coastal Monitoring Programmes bearing in mind that this is a long running project which provides much of the evidence that was needed to help develop the draft and more importantly will be key in helping deliver the outputs of the next strategy.

We thank you for hard work in preparing the draft and hope that our response is helpful and would like to reiterate that we would be very pleased to help complete this.

Yours sincerely

Bryan Curtis
Chairman of the Coastal Group Network of England and Wales

Consultation question responses

Before we finalise the strategy, including the vision, ambitions, strategic objectives, and measures, we'd like your feedback on the following questions. We've also included a free-text question, so you can tell us about anything important to you these questions don't cover.

Draft flood and coastal erosion risk management strategy questions

Question 1: To what extent do you agree with the vision: a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100?

This is a vision we can support however it is ambitious and will be challenging to deliver and really needs clarity on what is exactly meant by “resilient to and coastal change”.

Question 2: To what extent do you agree with the Environment Agency’s proposed? Strategic overview role as set out in the chapter ‘setting the context for the draft strategy’?

Part of the Coastal Group Network’s (CGN) mantra is working together in partnership so we support the strategy in trying to achieve this.

We support the idea of “place” and place shaping” to collectively better manage flooding and future coastal change but we are concerned that the Agency will not have the appropriate skills and resources to lead effective partnerships to deliver these. There is also an implication here that suggests that in the longer term the Agency will take lead on all coastal flood and erosion delivery. Whilst we acknowledge that the Agency and Maritime Authorities have the same powers with respect to coastal erosion how will the mechanism for change occur/be discussed? Without knowing the process we find it difficult to provide absolute support.

Whilst we agree that the Agency should lead on the provision of national data, information and tools on flooding and coastal change we are concerned that this implies a change in the governance and delivery of the National Network of Regional Coastal Monitoring Programme which provides the majority of coastal monitoring data and is led by the CGN, regional teams and the Agency. As we prepare the next bid for the programme the aspirations of the Agency on this should be made more explicit if this is indeed its intent so that we can discuss this in more detail.

As an aside we are disappointed not to see the CGN and Shoreline Management Plans (SMP) acknowledged as part of the Infographic which we believe highlights all the permissive powers and coverage of all the partners delivering this strategy.

Question 3a: To what extent do you agree with strategic objective 1.1: Between now and 2050 the nation will be resilient to future flood and coastal risks. Over the next year the Environment Agency will work with partners to explore and develop the concept of standards for flood and coastal resilience?

This is a bold objective which we would like to support however but are not clear on what is meant by “resilient” especially at the coast. We are also concerned with the language used. The word “will” is an absolute that will have to be measured but we see no description of how this will be done. As Climate Change is recognised as being in flux trying to be specific for a time period of plus 30 years is not recommended.

The concept of coastal resilience is new and whilst we would like to support it we do need to understand what it is you are proposing. Is it property resilience, community resilience, resilience of place or something else? As an aside physical property resilience with respect to property protection is something yet to be considered as the dynamic forces involved will put us all in a different ball game from those conventional systems currently being used inland.

Question 3b: Please provide comments on the measures described under strategic objective 1.1, and tell us about any additional measures you think there should be, and who could implement them.

Measure 1.1.1 is supported but we would recommend that the date be earlier than 2020 bearing in mind that we already have the 2018 climate predictions. We also believe that the advice on investment decisions needs to be bold and reflect the needs of the future based upon the climate change predictions.

Measure 1.1.2 cannot be supported as action is needed this year and not in 2022. We also need to better understand what coastal resilience actually is.

Question 4a: To what extent do you agree with strategic objective 1.2: between now and 2050 risk management authorities will help places plan and adapt to flooding and coastal change across a range of climate futures?

We support this objective but believe the timescale is too long and should be more immediate. As a long term aspiration it is sound but it really should be something that is done now. The important question not asked is which RMA’s will do what to deliver this?

Question 4b: Please provide comments on the measures described under strategic objective 1.2, and tell us about any additional measures you think there should be, and who could implement them.

In the main these objectives are supported bearing in mind that a lot of work on this has been done on the coast with respect to the SMP's and Flood and Coastal Erosion Risk Management Strategies. We do however welcome the new picture of flood risk which we assume will also include erosion together with any guidance, policy and funding on adaptive approaches at the coast?

Question 5a: To what extent do you agree with strategic objective 1.3: between now and 2030 all those involved in managing water will embrace and embed adaptive approaches to enhance the resilience of our environment to future flooding and drought?

Whilst these objectives have little impact on the coast we welcome and support adaptive approaches to enhance our environment to future flooding and coastal change.

Question 5b: Please provide comments on the measures described under strategic objective 1.3, and tell us about any additional measures you think there should be, and who could implement them.

We support the idea of using whatever opportunities arise to manage floods and coastal change.

Question 6a: To what extent do you agree with strategic objective 1.4: between now and 2030 risk management authorities will enhance the natural, built and historic environments in a better state for the next generation?

Whilst we support this we cannot see what has changed from what is already done. And why it isn't immediate.

Question 6b: Please provide comments on the measures described under strategic objective 1.4, and tell us about any additional measures you think there should be, and who could implement them.

Regarding coastal measures anything additional to what is currently required will need to include an assessment of how this will be funded.

Question 7a: To what extent do you agree with strategic objective 1.5: between now and 2030 risk management authorities will use funding and financing from new sources to invest in making the nation resilient to flooding and coastal change?

In the first instance the nation will never be resilient to flooding and coastal change but it may better understand it. We don't see any change from what has been done and what exists within current funding arrangements. Is there a hidden agenda and why doesn't this include all RMAs?

If coastal risk is high on the Governments Risk Register and Climate Change predictions are indicating that this will accelerate and get worse shouldn't we be looking to Government covering all costs so that the risk is mitigated? By this we do not mean wholesale protection but the full range of measures currently open to us.

Question 7b: Please provide comments on the measures described under strategic objective 1.5, and tell us about any additional measures you think there should be, and who could implement them.

Building onto the comments in question 7a we support the Government looking at whatever funding and financing arrangements it deems necessary as the principal funder for coastal management works.

We agree that In the future and certainly before 2025 the Government, on behalf of the RMAs, should test whether it is feasible to use upfront financing to deliver future adaptive approaches as it is in the best position to dictate any future policy and funding for this.

Question 8a: To what extent do you agree with strategic objective 2.1: between now and 2030 all new development will contribute to achieving place based resilience to flooding and coastal change?

We agree with this objective.

Question 8b: Please provide comments on the measures described under strategic objective 2.1, and tell us about any additional measures you think there should be, and who could implement them.

We cannot speak on behalf of all RMAs that they will invest in planning skills and capabilities to ensure they can advise planners and developers effectively to enable climate resilient places. It is very unlikely that Maritime Councils will see the need for such skills and capabilities unless they form partnered structures like the larger Coastal Council Partnerships where the need and demand may be more appropriate. We would like to believe that LLFAs may develop these skills and capabilities as part of their routine work as the demand and size of these authorities may justify such posts if this strategy is adopted but it must not be a target/burden for the RMAs.

Measure 2.1.2 seems to agree with our comments above in part as the Agency and LLFA's may provide the advice but it will be the local Planning Authorities job to use it as it see fit. We doubt that LLFAs will be in a position to advise Maritime Authorities on coastal adaptive approaches as they have hitherto, unless a Unitary, not involved themselves in coastal flooding or erosion issues so the validity of their advice would we suggest be questionable. Similarly, at present, as far as we know, the Agency's role in the planning process is limited to advice on flood risk only so a change in the current process will be required.

Question 9a: To what extent do you agree with strategic objective 2.2: between now and 2030 all new development will seek to support environmental net gain in local places?

We believe that measure 2.2.1 is bold and ambitious and support it even though we believe that it is unrealistic to deliver net gains on every site. Also bearing in mind the short implementation time scale and the new burden that will be imposed on RMAs we think that this this will be resisted but applaud you for trying.

Question 9b: Please provide comments on the measures described under strategic objective 2.2, and tell us about any additional measures you think there should be, and who could implement them.

The language of Measure 2.2.2 is not positive enough we support the idea if Government departments align and provide the policy, framework for measurement/reporting and funding for the new staff that will be needed otherwise we cannot.

Question 10a: To what extent do you agree with strategic objective 2.3: between now and 2030 all risk management authorities will contribute positively to local economic regeneration and sustainable growth through their investments in flooding and coastal change projects?

This is something that should already be being done so it is easy to agree with this objective.

Question 10b: Please provide comments on the measures described under strategic objective 2.3, and tell us about any additional measures you think there should be, and who could implement them.

In the main this is something that we can support however Measure 2.3.1 implies new infrastructure i.e. new defences there is no hint of adaption by relocation, retreat, beach management or maybe a sand engine. We feel sure that this is just an oversight in the text but it does highlight the complexities and diversity of what is being proposed in this strategy. We would also like to point out that most Councils are far better placed to identify regeneration and sustainable growth synergies for their areas that the Agency but we feel sure that this would all be drawn out with better partnership working as previously proposed.

Question 11a: To what extent do you agree with strategic objective 2.4: between now and 2050 places affected by flooding and coastal change will be 'built back better' and in better places?

Strongly agree with the concept.

Question 11b: Please provide comments on the measures described under strategic objective 2.4, and tell us about any additional measures you think there should be, and who could implement them.

It is once again easy to agree with Measure 2.4.2. bearing in mind this was something that we recommended and agreed in 2017 and is already underway. Something bolder would be better – something like, if SMPs are found to be unsafe because they are not deliverable or sustainable we should be saying that more detailed reviews or SMP3s will be delivered by 2030.

Question 12a: To what extent do you agree with strategic objective 2.5: between now and 2030 all flooding and coastal infrastructure owners will understand the responsibilities they have to support flood and coastal resilience in places?

Whilst a bold objective and one we would like to agree with we are struggling to understand who exactly this objective is aimed at and who will be dealing with it. As an aspiration we would like to support it but finding the owners of coastal infrastructure let alone making them understand their responsibilities will be extremely difficult especially as we don't yet have an inventory of all the coastal assets.

Question 12b: Please provide comments on the measures described under strategic objective 2.5, and tell us about any additional measures you think there should be, and who could implement them.

Measures 2.5.1 seems to be focusing on inland assets on not those on the coast so we will not comment further on this.

Measure 2.5.2 is something that is needed but this will be an additional burden on RMAs which unless funded will be difficult to achieve. RMAs currently collect and record their own asset data for their own specific needs and we anticipate, from past experience of Agency systems, coastal assets will be difficult to collect and input into a single system. We do however agree that it is something that needs to be done if we are to ever understand the state of the Nations flood and coastal assets.

We would also like to understand what is meant by coastal change infrastructure, is this erosion risk management assets?

Question 13a: To what extent do you agree with strategic objective 2.6: now and 2050 the Environment Agency and risk management authorities will work with infrastructure providers to ensure all infrastructure investment is resilient to future flooding and coastal change?

Strongly agree with the concept.

Question 13b: Please provide comments on the measures described under strategic objective 2.6, and tell us about any additional measures you think there should be, and who could implement them.

This is difficult to provide constructive comment on as there is little detail. As an aspiration we support the idea of at least a task force to get the whole matter into a more open forum for discussion and understanding of all partners' issues and constraints.

Question 14a: To what extent do you agree with strategic objective 3.1: between now and 2030 young people at 16 should understand the impact of flooding and coastal change, but also recognise the potential solutions for their place, and opportunities for career development?

We agree with this objective.

Question 14b: Please provide comments on the measures described under strategic objective 3.1, and tell us about any additional measures you think there should be, and who could implement them.

If the current curriculum is failing surely we should be addressing that before we start to provide any additional flooding and coastal change materials for teachers?

Question 15a: To what extent do you agree with strategic objective 3.2: between now and 2030 people will understand the potential impact of flooding and coastal change on them and take action?

We agree with the idea of trying to educate people but we don't believe that we can achieve the level on understanding meant by "will". Surely our job is to provide the evidence to underpin and highlight the risks to the decision makers and property owners to draw their own decisions and actions?

Use of the NNRCMP data can be better utilised to illustrate the changes and effects on the coast.

Question 15b: Please provide comments on the measures described under strategic objective 3.2, and tell us about any additional measures you think there should be, and who could implement them.

We agree with the idea of future research providing the evidence that is needed to take understand and where they are able to take responsibility for future flooding and potential coastal change but not that all RMAs should develop and use digital tools to do it. We acknowledge the importance of digital tools and technology but the RMA's should be provided with a toolbox which they can use based upon the audience and problem that they are trying to deal with. One size and in this case one format does not fit all.

Question 16a: To what extent do you agree with strategic objective 3.3: between now and 2030 people will receive a consistent and coordinated level of support from all those involved in response and recovery from flooding and coastal change?

We agree with this but are concerned that it isn't already in place.

Question 16b: Please provide comments on the measures described under strategic objective 3.3, and tell us about any additional measures you think there should be, and who could implement them.

We agree with all the measures but consider that if there are currently deficiencies in the emergency planning system that all the time scales should be brought forward and made more immediate

Question 17a: To what extent do you agree with strategic objective 3.4: between now and 2030 the nation will be recognised as a world leader in managing flooding and coastal change, as well as developing and attracting talent to create resilient places?

We would naturally agree with this as we are already a world leader in these fields and being realistic we don't believe that this should be an objective as it is already a given. The CGN continues to work with partners and overseas Governments, contractors and Consultants to share knowledge and expertise both one to one by visits, by research and conferences. Examples of sharing like this can be found throughout the up and coming ICE Coastal Conference later this year.

Question 17b: Please provide comments on the measures described under strategic objective 3.4, and tell us about any additional measures you think there should be, and who could implement them.

We support the outcomes but really don't believe that the RMA's will have much of a role in most of them but I'm sure would like to be involved where they can.

Question 18: Please provide any other comments:

Dealt with in the covering letter above.