

Paper F

Chairman's Coastal Highlights - Updates, Links, Events, Notes, Consultation responses and requests (August 2019)

(For initials used see contacts)

Introduction

Welcome to the third of these updates which I hoped would be shorter than previous issues but that hasn't quite worked out but please persevere. Although usually a month for summer holidays it doesn't seem that way for me. With deadlines for the SMP R questionnaires and many focus groups been underway it has been busy not to mention the very late and curious call for evidence by Defra didn't help.

Thanks to those that responded on the future of these updates. It would seem that my missives are useful so I will continue.

Welcomes and Goodbyes

I have had no word yet on recruitment of a replacement for Andy Shore's post but news on the grapevine is that it is progressing well.

What's Changed/Changing

Many of you may know that Tim Collins will be leaving Natural England in November but at the moment is on leave so more will be made known in due course.

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

So far I haven't seen dates for the next forum but I am assuming that this is because of the turmoil of Brexit which I was trying not to mention. The spring forum didn't take place so I am hopeful that an autumn meeting will be arranged soon as there is a lot going on and unless we know what it is we can't help much.

ICE Coastal Conference 2019 24th to 26th September 2019 La Rochelle, France.

Just so that you are aware there are still places at the conference so if you haven't yet booked please do so soon. Whilst many of you have booked I am aware that others I was expecting to go haven't yet booked so this is just a reminder. Please can you make it more widely known within your networks in case there other brinkmen.

A special mention for the graduate event which Nick Hardiman has arranged. This has previously been sent to you but just in case there are any further delegates I am raising it again. The extra event for young engineers/graduates on 23rd September 2019 will be held at the conference. If you know anyone who would be interested then please let me know. We are really hoping to attract new graduates and engineers to the conference itself, and have something else to offer too. This event will be hosted by the Environment Agency free of charge.

<https://www.ice.org.uk/events/ice-coastal-management-2019>

National FCERM Strategy

Work is proceeding on preparation of the next phase of the strategy and workshops to inform and get feedback on the consultation responses are planned for early September. The dates for these are listed below in "substitutions". A request to feedback comments and thoughts to the substitutes for the 3 workshops was circulated on 28th August 2019. I will also attach the papers for the Ambition workshop as a separate attachment to this update so that you can see the format and what is going to be discussed.

The Strategic Environmental Assessment scoping report consultation formally closed ref. Gov notifications 07/08/2019

Coastal Group Meetings attended by the Chairman:

NWCG meeting 20th August 2019, Preston. This included a very honest presentation by Lyall Cairns Chair Southern Coastal Group on the work that he has done in establishing the East Solent Coastal Partnership. This was followed up by a workshop on how a partnership like this could be established in the NW. More to follow in due course.

Coastal Assets

Although the meeting was in July the minutes for the last Steering Group weren't available for the last update so I have reproduced the actions and notes below for your information:

22 July 2019 Coastal Assets (Telecon) Meeting

Attending: Philip Rees, Catherine Wright, Bryan Curtis, Jim Barlow, Rachael Hill

1. Introductions

CW outlined purpose of the meeting and confirmed that

2. Update on 3rd party coastal assets

- Assessment of 3rd party assets in Devon and Cornwall. Philip updated on the work to identify all assets in the Area. It has identified an additional 1000 assets not previously identified. Ownership categorise between other, local authorities and EA. 'Other' includes a range of government, commercial and NGO etc. Some assets are orphan where there is no owner. The primary owners are harbour owners / trusts e.g. Mevagissey; and MoD. The Area is undertaken further work on the risk assessment of asset condition 1-3 including properties at risk, to be available by mid-September.
- Some other coastal groups have done similar exercises e.g. Solent, NE and NW, Coastal Partnership East is also doing work. Bryan noted that it would be helpful to agree and share a methodology for those who have yet to undertake assessments. SW exercise was funded by local levy initially and more recently from FDGiA via the adjustments to the coastal monitoring programme (CMP). The work in D&C is providing information on costs to inform the CMP business case.
- Progress with coastal monitoring business case development. Catherine confirmed that the Environment Agency expects asset condition to be included as a priority in addition to other monitoring essential to managing flood and erosion risk on the coast. The level of funding will depending on showing benefits and vfm in the business case and the SR19 settlement. Philip offered to assist with business case.

Catherine is meeting Charlie at the Channel Coastal Observatory on 20 August to discuss the development of the case. Bryan will sponsor the business case for coastal group chairs, Catherine is the EA's sponsor.

- Coastal Group Chairs' sub-group on coastal asset data. Action: Bryan to work with John Cocker and coastal group chairs to get an overview of the understanding of coastal assets and the gaps to inform the business case and RFCC chairs paper.
- Partnership Funding. Monitoring third party assets may require a PF contribution e.g. local levy. The current CMP does not require a PF contribution on the basis that it justifies subsequent investment and PF contributions. We discussed the broader issue with the current PF funding formula on the coast. EA is working with Defra on changes to the PF funding formula. John Russon updated RFCC chairs on this work at their past meeting in York.

Action: Rachael and Jim to clarify the PF requirements for the next CMP programme with LRP.

3. Scope of the paper to RFCC Chairs on 27 September 2019

We agreed the scope as follows:

- Update on Devon and Cornwall 3rd party assets work
- Overview of the understanding of coastal assets around the country (from coastal group chairs)
- Seek RFCC chairs' support for the strategic priorities for the next CMP
- Steer on the future implications of this work for managing assets on the coast including 3rd party liabilities.
- Rachael and Catherine will pull the paper together and share drafts for comments with this group.

4. Next steps

- We will agree the need for any further meeting following RFCC chairs meeting.

As you can see there are some actions in this for us so I wanted you to be aware and seek your support when the time comes.

CGN Substitutions made or planned

None in August but the following planned in September:

FCERM Strategy Ambition 1 - Climate resilient places 5th September 2019, Birmingham – Bryan Curtis covering on behalf of the CGN.

FCERM Strategy Ambition 2 - Today's growth and infrastructure – resilient to tomorrow's climate 4th September 2019, Birmingham - 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, Birmingham - Andy Smith covering on behalf of the CGN.

Consultations

Defra - Call for written evidence on flooding and coastal erosion policy

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.

Thanks to all that contributed to the final response is attached at the end of this update.

R and D:

Ciria Embankment benchmarking

I have been asked whether we can help identify individuals who would be interested in taking part in the above. More detail for which can be found below.

Purpose: The formation of an Environment Sector led forum, supported by the IPA, of water companies and local authorities in order to define and develop a standardised methodology for the benchmarking of embankments. The forum will aggregate a pool of embankment data from participants and will seek to establish a consistent data standard, approach to data collection and application of this data to future cost estimates.

What is benchmarking?: Benchmarking uses historical information to identify standards and best practice. In reference to project delivery, the process involves comparing projected, or actual, project performance information against similar information from past projects with the aim of improving assurance and delivery. The benchmarking process will analyse information from past projects and programmes to create a point of reference to compare observed or predicted details of a particular project.

Read about the Principles of Cost Benchmarking and Expectations, produced by [Cabinet Office](#) and [Infrastructure and Projects Authority](#) at <https://www.gov.uk/government/publications/construction-cost-benchmark-data>.

Some of you have or will be approached but at present the date of the first meeting of this work is 10th October 2019 which I cannot attend.

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

Following the above workshops the team are planning a final event where they will disseminate more of their findings on 7th November in London. For those of you involved I assume that you will have had similar invitations but I wonder if to be more efficient we send just one or two representatives? **Thoughts please**

I have already responded but am happy to stand down should others want to go and represent the network. Please can you let me know if you planned to go as well as I don't want to waste anyone's time.

Coastal Adaptation and Managing Access – Wales Coastal Forum – Cross border working should you be able to help.

The Wales Coastal Groups Forum are undertaking some work on Coastal Adaptation and Managing Access which could benefit from some input from CGN partners so if you are interested or not seen this here it is. **Please also complete the very short survey on this topic** at this link – 9 questions, very limited free text, should take no more than 5 minutes.

<https://www.surveymonkey.co.uk/r/76SCQQZ>

SMP – R

As a summary for the CGN the priority has been ensuring the completion of the SMP questionnaires at the time of writing 3 of the 20 have been completed and returned and promises for the remainder on or soon after the deadline of 3rd September 2019.

Dates for future meeting have been set for the TAG and Project Board and I am hopeful that a longer set of dates for meeting into next year will follow soon.

Next TAG Meeting 23rd October 2019 Jacobs, Cotton Centre, London SE1 2QG and next Project Board meeting 24th October 2019 venue TBC, London.

All the focus groups as follows have now been undertaken and I will endeavour to get copy of all the outputs for circulation when they are completed:

- *Thurs 18th July – Planning*
- *Thurs 1st August – Adaptation*
- *Weds 7th August – Protected Sites*
- *Mon 12th August – Funding*

A big thanks to the SMP R team and all of you and your teams that participated.

I will not comment any further on the refresh but refer you to the recently circulated Update 3:Q2 FY2019/20 which I hope will be more frequent now work is underway.

Modernising Appraisal Workshops

As mentioned in my last update 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 workshops were planned for September but as yet I have not had any feedback as to when these are planned so there may be a delay of a last minute panic! I will keep you informed when I am.

National update to UK coastal extreme sea levels (Request to invite colleagues)

I have been asked inform you of an important update to the UK extreme sea levels (ESLs) and guidance contained within the Coastal Flood Boundary (CFB) dataset and documentation. The new update replaces and improves on the CFB work published in 2011 therefore all new coastal

assessments should be based on this new data and guidance. The work has been a collaborative project between the EA, SEPA, NRW and DfINI therefore updates are available for and apply throughout the UK.

Attached is a briefing note summarising the work carried out on the project and changes in level from the previous CFB around the country. The new dataset and documentation will be available for download on environment.data.gov.uk from **29th August 2019**. Note: before this date, the website only holds the previous 2011 data so shouldn't be downloaded before this date. A message on the website currently notes the new data is expected soon and will be removed when the new data is uploaded.

Supporting documentation will be available on the website including a user guide detailing best practise on how to use the data. In addition, we'd like to provide everyone the opportunity to hear more about the work carried out to improve the dataset, highlight changes to ESLs and ask any questions. We will be holding two online meetings at 12 noon on 9th September and 2nd October. If you haven't already seen this and signed up 2 online meetings are planned for the 9th September and 2nd October 2019. Please contact Jenny.Hornsby@environment-agency.gov.uk for more details.

Coastal Handbook

After 2 iterations this handbook is in my opinion in need of an update and I was hoping that I could possibly prevail on some of you to help me. Clearly so of the work mentioned regarding modernising the appraisal guidance will be done by the Agency but other chapters could be done but us or someone we know with the specialist skills in particular areas, so I was hoping to get the ball rolling in a bid to try and keep this handbook updated so than it does not become obsolete. Now the two "V's" views and volunteers. I doubt we could do this in one hit but we could do it in parts or chapters and re-post it on line!

<https://www.gov.uk/government/publications/the-coastal-handbook-a-guide-for-all-those-working-on-the-coast>

New GovUK links and updates for the coast or possibly affecting the coast -
GOVUK@public.govdelivery.com excluding those for the Thames Barrier for August 2019 - including date, time and brief summary of content:

- SR2019 No 2: steps, ramps and other similar structures excavated into the existing bank profile of a main river Page summary - Standard rules for constructing steps ramps and other structures in to existing bank profile of main river. Change made - Time updated 11:01am, 1 August 2019
- SR2019 No 3: installation of water gates across a main river Page summary - Standard rules for installing water gates across a main river. Change made. Time updated 11:01am, 1 August 2019
- Standard rules: environmental permitting Page summary- For each activity there is a set of rules, guidance on how to comply with the rules and a risk assessment. Change made

- We have added 3 new Standard Rules under Flood risk activities for 2019. Time updated 12:13pm, 7 August 2019

- [Arundel tidal defence scheme](#) Page summary - How the Environment Agency is working to reduce flood risk in Arundel. Change made - Updates to the scheme made 8 August 2019. Time updated 3:35pm, 8 August 2019
- [UK one of first countries in Europe to receive Google Flood Alerts](#) Page summary - The UK has become one of the first countries in Europe where people will be able to receive flood alerts on their computer, phone or personal device through the Google Public Alerts map. First published. 11:03am, 9 August 2019
- [How to prepare a strategic flood risk assessment](#) Page summary - Guidance for local planning authorities on what information to include in a strategic flood risk assessment. Change made - Detailed information has been added in all sections for local planning authorities, on how to prepare a strategic flood risk assessment. Time updated 11:00am, 12 August 2019
- [Application for an environmental permit part B11: standard rules permit for flood risk activities](#) Page summary - Application form and guidance notes for a part B11 standard rules permit for flood risk activities. Change made - Added new standard rules for flood risk activities to part B11. Time update 10:36am, 13 August 2019
- [Application for an environmental permit part B11: standard rules permit for flood risk activities](#) Page summary - Application form and guidance notes for a part B11 standard rules permit for flood risk activities. Change made - Republished version 1 of Application for an environmental permit Part B11 – Flood Risk Activity standard rules application. Time update 2:34pm, 13 August 2019
- [Application for an environmental permit part B11: standard rules permit for flood risk activities](#) Page summary - Application form and guidance notes for a part B11 standard rules permit for flood risk activities. Change made - Added new standard rules for flood risk activities to B11. Time updated 3:02pm, 19 August 2019
- [Work under way to upgrade coastal defences in Essex](#) Page summary - Work is underway on a £2 million scheme to refurbish the flood defence embankment in Stansgate, Essex, offering a higher level of protection to people living nearby. Change made - Time updated 4:25pm, 19 August 2019
- [Exmouth tidal defence scheme](#) Page summary - What the Environment Agency, working in partnership with East Devon District Council, is doing to reduce flood risk in Exmouth, East Devon. Change made - Construction schedule added. Promotion of

public drop-in event removed as date has passed. Time updated 11:39am, 28 August 2019

- Community engagement on climate adaptation to flood risk Page summary - This evidence review is part of a larger project looking at community engagement for long-term adaptation to flood and coastal erosion risk. Change made Time updated 6:00am, 29 August 2019

Coastal Group Links:

- North East Coastal Group (NECG) - <https://northeastcoastalgroup.wordpress.com/>
- North West England and North Wales Coastal Group (NWENWCG)- <http://www.mycoastline.org.uk/>
- East Anglian Coastal Group (EACG) - <http://www.eacg.org.uk/>
- South East Coastal Group (SeCG) - <https://se-coastalgroup.org.uk/>
- Southern Coastal Group (SCG) - <https://southerncoastalgroup.org.uk/>
- South West Coastal Group (SWCG) - <http://onlineartandcrafts.org/>
- Severn Estuary Coastal Group (SECG) - <https://www.severnestuarycoastalgroup.org.uk/>

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.
 - All papers and posters not completed and being formatted for the proceedings.
- CIWEM Rivers and Coastal Group – No meeting in August
- FCERM Technical Advisers Group Flooding and Resilience – No meeting in August
- Coastal Research Steering Group (MJ Covering this)
- Appraisal Technical Group – No meeting in August but the format of the group has recently changed so to the chair. Details when I have them.
- LGA SIG – SIGSOG meeting planned for 8th August 2019 was cancelled. Field trip dates to Allerdale 17th to 19th September 2019. **Call for Chairs attending to possibly update the SIG on the value of the CGN and our continue partnership working and the SMP R whilst I await consent to attend.**
- 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 August.
- MMO – No meeting in August.

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 (August 2019)

- 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)

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

- 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)
- Anglian Eastern RFCC (Local Choices) 16th September 2019
- CIWEM RCG London, 17th September 2019 (BC)
- ICE Coastal Management Conference, LA Rochelle 24th to 26th September 2019 (BC)
- Anglian Central RFCC Meeting 26th September 2019 (Local Choices)
- 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 (Refer questionnaires request for dates)
- Coastal Challenge Summit and the CPN Annual Forum 8-9th October 2019 Southampton [Click here](#) for more information.
- NNRCMP Strategic Board, Southampton 9th October 2019 (BC, SR, JC, JB)
- Southeast Annual Partners Meeting, Southampton 10th October 2019 (BC)
- South West Regional Monitoring Programme Annual Partners Meeting 16th October 2019 Taunton- [Click here](#) for more information.
- Climate adaption in the UK: latest on developing resilient infrastructure, channeling investment and environmental protection 19th November 2019 Central London [Click here](#) for more information.
- Biodiversity and species protection – net gain, governance and local approaches 21st November 2019 Central London [Click here](#) for more information
- Managing our climates in a climate emergency 26th November 2019 Further information to follow
- 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

Lyll Cairns (LC) Southern Coastal Group Chair Lyll.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

Addendums:

Written evidence on behalf of the Coastal Group Network for the call for evidence on flooding and coastal erosion policy response:

Background

The Coastal Group Network (CGN) was formed late in 2008 as part of the Environment Agency's (EA) Strategic Overview at the request of 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.

This response should be read in conjunction with other partner 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 and
- Environment Agency

We welcome the call for evidence and the chance to be able to influence this issue however as a Network, as already noted, we have no executive or statutory function so will not be able to help with specific examples but our various partners and members will. The call was shared as widely as we could with a request for responses directly to you. We will respond and challenge where we can but in the main the substantive examples will come from those listed above.

General Comments

Before we start to respond to the questions there are some queries and feedback we would like to draw your attention to. In the introduction, population growth is cited as being something that will increase flooding and erosion when in fact it won't. Climate change represents by far the biggest risk. Allowing homes to be built in areas that are at risk of flooding and/or erosion is a

more likely outcome but population growth alone is not a material cause of any increase in flooding or erosion. A joined up approach by government around housing targets/requirements, planning and flood and erosion risk management with extended timescales (as set out in the SMPs) is required.

We have worked very closely with the Environment Agency (EA) on its new Flood and Coastal Erosion Risk Management Strategy (FCERMS) and are concerned that the timing of your delayed Policy Statement seem out of phase for one to inform the other. A considerable amount of effort by many organisations and individuals have helped in guiding the draft strategy and we are concerned that it appears that it may now be delayed. Can any assurance be given that the FCERMS will not be delayed?

We are pleased to see the emphasis on the 25 year Environment Plan but we are concerned that the mechanisms by which it will be delivered have not yet been forthcoming so if the policy statement, new FCERMS and improved spending review will do this we fully support it but we must ask why haven't we been given more time to respond and provide the evidence to support this call for evidence? A call for evidence in the peak holiday period and such a short time scale precludes the quantity and quality of outcomes needed for this important call.

Whilst we don't dispute it we do not recognise the £1 billion being spent on the maintenance of flood assets. It is our understanding that the significant investment by Local Authorities and other third parties in maintaining flood and erosion risk management assets is excluded from this estimate. The figure used is assumed to be the EA spending on flood assets so the true figure of spend on all flood and coastal assets remains unknown.

We have tried over many years to get all this information on a common platform so that we could better understand this, but to date we have failed. However the challenge still remains a guiding hand from Defra would enable it to be done much easier should it be deemed to be part of the future spending review and longer term work.

Whilst we recognise your definition and the consequences of erosion it could have better been described as the loss of land to the sea that cannot be recovered from. It is finite. There is also an assumption that erosion affects only higher ground. The impacts on land close to mean high water spring tide level which could not only erode but also be inundated by the sea as well are not well articulated.

We are pleased that new research and development is being commissioned for understanding flood resilience. In particular will it be sufficient to influence the government's actions? Please would you advise on the scope of the research, who is doing it, how and by when?

In many similar reports and consultations like this there is always a marked demarcation between erosion and flooding because, we suppose, they are dealt with by different public bodies and statutes. If we can achieve anything by this work now please can we be more transparent and start to look at them together as part of the same problem "climate change and sea level rise"? In most cases flooding can be recovered from as the property assets (although usually damaged) remain in place but erosion is more catastrophic and in most cases the land and assets are totally lost making recovery impossible. Flooding can also be insured against, whereas erosion, as far as we know, cannot. The comments made about the resilience of

homes, businesses and infrastructure both in this call and in the 25 Year Environment Plan will be impossible to deliver with respect to erosion. If natural processes are causing erosion of coast/land those homes, businesses and infrastructure cannot be made resilient to it. Unless we protect it or somehow change the natural forces or processes it is a certainty and thus the only resilience is acceptance which we don't believe is the intention. We do not believe the authors of the call have understood the forces, processes and consequences of resilience and erosion. Whilst resilience to some flooding is possible it is not the same for erosion and we should be clear on this. The text does not deal with both erosion and flooding in equal measure in most instances erosion is not mentioned and we believe this is because it so difficult to deal with however the omission of it will not help us all understand it and thus deal with it.

The definitions of land at risk of flooding and land at risk of erosion are well defined in the appropriate statutes but with sea levels rising and some land sinking we introduce further confusion and acceleration of the inevitable. Areas that are close to Mean High Water Spring Tides levels now (which are treated as erosion risk and therefore the responsibility of the Maritime District Councils (MDCs)) will soon, (as sea levels rise and land sinks) become flood risk areas, currently the responsibility of the Environment Agency. The problem is therefore common to both MDCs and the EA and should be jointly resolved?

There appears to be only three options; protect, move from harm or accept the risk of total loss. Unless we protect or somehow change the natural forces or processes or move the receptors from harm the only resilience is acceptance which we don't believe is the intent of this. We do not believe the authors of the call have understood the forces, processes and consequences of resilience and erosion. Whilst resilience to some flooding is possible it is not the same for erosion and we should be clear on this. The text does not deal with both erosion and flooding in equal measure in most instances erosion is not mentioned and we believe this is because it is so difficult to deal with, however the omission of it does not assist in the resolution of this issue.

Although we don't want to see delays to the FCERMS this will be the ideal time to set out what the Government is prepared to spend to protect the coast of the realm from either flooding or erosion so that we can look at possible options be they defence or adaptation. We, the representative for the "Coastal Practitioners", will need some clear guidance on what can and what can't be done and what will and won't be funded before we can be transparent and be able to discuss this with our wider coastal stakeholders. There is a need for honest and transparent conversations with our wider coastal stakeholders and this guidance is needed before this can happen.

Responses to the set questions are set out below but we must point out that the CGN nor Coastal Groups are required to maintain records and for the majority of questions either the Environment Agency or Defra itself should have been able to respond. Depending upon the time scales, if records have been kept, you should collectively be able to retrieve at least 25 years of data. Should you need data prior to this archives from the Department of the Environment will need to be interrogated.

The original question is stated first then the response in *italics* after:

Questions about us:

1. Would you like your response to be confidential? *No*
2. What is your name? *Bryan Curtis*
3. What is your email address? *Bryan.Curtis@hotmail.co.uk*

4. What is your organisation? *Coastal Group Network*

Questions on what we understand by the term “resilience”

5. How can the different aspects of resilience be brought together into one “overall resilience” concept?

We don't readily identify with the term resilience as you and the Environment Agency have set it out in both the FCERMS and in this call for evidence. As we have no statutory or executive function but represent a broad stakeholder/partner base around the coastline of England and Wales we have no remit to deliver the concept of resilience but we do have remit to influence the definition of what it should be. As we represent our partners with both coastal flooding and erosion powers we are ideally suited to help.

At present in Local Government the term resilience is most used more in emergency planning and not in coastal management which is really what this call for evidence will ultimately be informing within the policy statement.

As you have previously pointed out the Environment Agency have used the phrase “resilience” in their recent draft FCERMS consultation. Whilst it may have been used elsewhere before this was something that we as a network didn't readily recognise as a concept on the coast. Our response extracted from our feedback to the FCERMS was as follows: “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”

We have had no further involvement with the strategy and await the final draft but caution that as it stands the CGN believes that the resilient places phrase does not reflect the coast and we remain unsure as to how we can help deliver this aspiration. This call for evidence is a timely intervention to define what resilience on the coast means so that we better assist in delivering it, if it is indeed adopted as part of your future policy.

In the para entitled - What we understand by the term “resilience” (page 5) which features a table the last paragraph of which highlights “Relevant flood and coastal erosion approaches” yet it would seem very few erosion approaches are considered. The Flood Resilience Community Pathfinder outputs, from inspection, have no remit to consider erosion which leaves us in a difficult position when trying to advise you on how we use it for erosion.

The five aspects of community resilience cited on (page 6) appear to have no relevance to erosion risks at all. Only flooding is mentioned. Is this an omission or was it an error? All but 1 mention flooding or associated flooding groups and only Community Resilience is non-specific but we do recognise the “Coastal Concern Action Group” which campaigned for proper governance and social justice for which it

gained considerable success and recognition both here and overseas. Coastal flooding is not well represented in the 5 aspects of community resilience. Coastal flooding is most likely to be as a result of overtopping or erosion of a defence or where a breach or outflanking of existing defence takes place which means inevitably sudden and dynamic flooding over potentially large areas which will mostly likely be urban. Clear examples of this were seen in the 1953 floods which are well documented. Whilst the defences on the east coast have now been vastly improved the consequences of failure of the coastal defences have increased with higher inundation levels (due to higher sea levels) and greater numbers of vulnerable people within the flood area. Should a breach occur now the consequences are likely to be disastrous? Due to the nature of this type of event it would be unlikely that individual property resilience measures would be in place. Whilst these 5 criteria might work well for normal fluvial, ground or surface water events a completely different approach for the coast will be needed.

Resilience is widely accepted to be the process of adapting well in the face of adversity, trauma, tragedy, threats or significant sources of stress — such as family and relationship problems, serious health problems or workplace and financial stressors. It is widely thought/accepted to mean "bouncing back" from a difficult experience. This being said we do not believe that you would ever be resilient to erosion for either the partial or total loss of your main home? We say main home as the primary family residence. The sudden total loss of your home without warning would, for most, be a life changing event bearing in mind you would most likely not have any insurance cover to assist in any recovery.

We would welcome the extension of greater resilience to cover improved appropriate monitoring, assessment and subsequent warnings where evacuation and removal from harm (of the home owners themselves and subsequently the property) can be executed in a timely manner? Examples of this can be found in the Defra Adapting to Coastal Erosion - Evaluation of rollback and leaseback schemes in Coastal Change Pathfinder Projects, July 2015 together with the associated outputs. Practical examples are routinely exercised by the East Riding of Yorkshire Council where erosion risk is high. Other areas have similar methods yet we are aware that some areas around the country have development on former landslip where no long term monitoring is in place where erosion of the protection at the toe could trigger dormant slides to possibly restart.

It is widely accepted that if communities understand the risks that they face they are far better able to engage and deal collectively with those risks. The government must be applauded for raising the awareness for those at risk of flooding with the National Flood Resilience Review and the good work undertaken by the EA with flood mapping and warning and informing of these risks yet it still does not promote the National Coastal Erosion Risk Mapping (NCERM) undertaken to highlight the risk of erosion to the nation. This valuable work is not readily available to the public so the original intention of the project completed in 2016 has been lost. Acknowledging that this work exists, yet is hidden from the public eye, is concerning and we have no doubt there are good reasons for it but being open and transparent with it may help communities to start to better understand the risks they face. Whilst much of the information contained in this system may be available via other sources this was seen as

the only place where all erosion risk was brought together and illustrated to the public for them to assess, determine and act upon that risk (whether already living in an area at risk or looking to purchase property). Across the flood and erosion risk management sector we have moved on considerably in the last 20 years to developing better understanding of risks and providing plans, strategies and resources for us to monitor, mitigate or deal with them. Improved risk transparency through the NCERM outputs and dare we say stronger planning legislation (to prevent development in inappropriate areas such as those at risk of erosion or coastal flooding) will certainly improve the situation. We realise that this will involve more than one government department but following the recent revision of the National Planning Policy Framework all reference to considering the outputs of the Shoreline Management Plans (SMP) and their outputs seems to have been removed. The 20 English SMPs are currently being refreshed and are widely accepted as the best example of the highest level future direction of how a section of coastline should be managed in the next 100 years. It is therefore a little concerning that they no longer form part of the NPPF guidance as this leaves the risk of future inappropriate development a high probability.

6. How can the different aspects of resilience be brought together into one “overall resilience” concept?

We do not believe that we have collectively understood or agreed to the concept of resilience so it is difficult for us to bring all the aspects of it together and roll it up as an overall concept. At present the coastal flooding element of it seems too complex to try and summarise. In the main where defences are provided at the coast flooding would most likely occur from either overtopping or a breach in the defence meaning that large amounts of water would be liberated into an area that had hitherto enjoyed being dry and safe. If communities were effected by such events because they weren't aware in the main that they were at risk they would be not be resilient they would not “bounce back” easily. No matter how much information we provided in advance of the risks by nature of the trust within these communities they believe that the government and other Risk Management Authorities (RMA's) would protect them. We do not believe that they could ever achieve “overall resilience”.

The level of risk varies around the country and whilst we used the idea of just coastal flooding as an example above what about coastal flooding coinciding with heavy rain, high ground water and probably surface water flooding? Could communities be that resilient? Could the governance both local and national be that resilient? With climate change predictions rising, population numbers rising and infrastructure not being well maintained it is only a matter of time before we find out.

So far property level protection measures have been limited to communities with relatively small scale ground water, surface water or fluvial problems which would mean that they could be possibly described as being resilient. Regrettably as far we know there are relatively few property level solutions for coastal flooding areas in place due to the larger areas that are likely to be affected and the potentially dynamic nature of the flood waters. Where protection has been installed it is as a result of

frequent reoccurrence in an area known to be at risk with a pragmatic owner or where there is little wave action.

In the main most areas that enjoy either flood or erosion risk management measures do not usually understand the risk that they face. The problem is deflected to those that provide and maintain the risk management measures. If the risk management measures be they beach, sea wall or similar are seen to be being maintained the communities that they protect will not take one iota of interest in what is done or how much it costs until erosion or flooding occurs.

Questions on describing outcomes, driving action and monitoring progress

7. Please provide examples from other contexts of the effective use of metrics to achieve an overarching outcome (e.g. sustainability or wellbeing) and of frameworks which are successful in supporting this.

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities or EA may be able to help.

8. What would be the advantages and disadvantages of using composite metrics to describe, drive and monitor flood and coastal erosion outcomes (nationally and locally)?
 - a. If you identified disadvantages in question 8, how may these be overcome?

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities or EA may be able to help.

Questions on enabling action in coastal communities

9. Please provide evidence about approaches which coastal protection authorities and coastal groups can use to make a robust assessment of the long-term affordability and ongoing sustainability of coastal management policies, including any barriers to implementation.

The best example of an approach is the Shoreline Management Plans which are currently being refreshed in the light of the many changes in natural processes, climate change predictions, policy, guidance and legislation since they were completed

The refresh will provide the basis and framework for making those assessments and implementing coastal erosion risk management policy changes where identified in the SMPs, enabling them to move from the current state to the targeted, more sustainable, position. The principles to move towards more sustainable coastal management are relatively clear, but barriers include the lack of wider coastal management policy, e.g. compensation for those affected by property loss, broader planning to recreate communities that will be displaced, addressing the costs of abandonment both in terms of people and removal of coastal defence assets where required.

Long-term affordability is a more challenging issue, primarily due to the absence of any long-term policies or commitments from central government with respect to coastal defence. We are currently only able to make long-term decisions based upon present day expenditure rules, which we know historically alter from decade to decade and there is no national policy to what will or won't be funded in the longer term, nor the basis for such decisions, e.g. a commitment to protect communities over a certain size for example. Third-party (partnership) funding is equally problematic as 'long-term' is often considered to be e.g. 20 years by many of those contributors, which is 'short-term' in coastal management terms. Consequently, it is difficult for third-party (i.e. partnership) funding sources to make long-term (i.e. decadal) decisions on committing funds beyond the immediate term.

10. Please provide information about how coast authorities have successfully combined decisions about managing the coastline (Shoreline Management Plans) with wider plans and decisions for the area (including land use, economic development, social and environmental objectives) and the challenges of achieving this.

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities could. Despite this one good example of a strategy which has recently been evolved based upon such objectives is that covering the Gorleston to Lowestoft shoreline (contact Coastal Partnership East). That strategy has moved away from the original SMP policies to develop an alternative sustainable plan, taking account of contemporary evidence and information on physical shoreline change coupled with local business interests and their significance to the wider local economy (employment, spending), and an appetite for partnership funding to contribute to delivering a holistic strategy for all concerned.

The SMP refresh is also introducing the concept of using triggers for evaluation and change, which will present approaches to incorporate such decisions in the future. Integral to this is also monitoring of physical change at the coast, without which the ability to confidently accommodate matters in a robust fashion will be compromised. The outputs from the regional monitoring programmes as part of the National Network of Regional Coastal Monitoring Programmes are an essential and critical element of achieving this, without which we will see inappropriate (and ultimately costly) decisions being taken.

11. Please provide examples where an authority has sought, successfully or unsuccessfully, to use its Coast Protection Act 1949 powers to a) make a coast protection scheme to carry out coast protection works and b) levy coast protection charges in respect of such a scheme.

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities could although either Defra or the Environment Agency would be in a better position to provide a list of all those schemes and authorities that have carried out coast protection schemes that secured grants for these works and as far the CGN are aware no authorities have sought to raise levy's for coast protect schemes.

12. Please provide examples of cases where a coast protection authority has sought to create a Coastal Change Management Area including any barriers the authority faced, and how the area is helping local communities to adapt

In this instance for reasons already stated the CGN cannot assist with this but there are many examples of this and individual authorities will no doubt respond.

Question on corporation tax relief for business contributions

13. Please provide evidence on how and where businesses have used the provision for them to receive corporation tax relief on their contributions to government funded flood and coast projects.

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities could.

Questions on local funding initiatives that harness community and private contributions

14. Please provide examples of initiatives delivering flood and coastal erosion outcomes which have been funded from sources other than the public sector, and explain how they were funded.

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities or EA could. There are a number of large schemes around the country where this has been successful.

15. What determines the success of flood and coastal erosion initiatives which have private and community contributions?

We are not aware of many large scale coastal erosion initiatives where private and community contributions have been successful.

16. What could be done to encourage private and community funded initiatives and help them succeed?

This is a question that we have yet to answer. There may be clues in responses from Local Authorities and the EA

Questions on developer contributions

17. Please provide evidence on the extent to which contributions being made by developers (through section 106, Community Infrastructure Levy and other means) are being used to fund works to manage the flood risks.

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities or EA could.

18. What are the barriers to securing and using developer contributions to ensure that new developments are safe for their lifetime, taking account of climate change? How can these barriers be overcome

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities or EA could.

19. Please provide examples of cases where authorities have sought (successfully or unsuccessfully) to pool contributions to build larger pieces of flood or coast infrastructure that benefit more than one local authority area.

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities or EA could.

20. Where flood alleviation measures have been put in place as part of a new development, have the ongoing maintenance costs been provided for under these arrangements?

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities or EA could.

Questions on managing financial risks from flooding

21. Please provide examples of public and private organisations which are already disclosing their financial exposure to flood or other climate risks and how they go about it.

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities or EA could.

22. What are the barriers to identifying and disclosing financial exposure to flood risks and how could they be overcome?

In this instance for reasons already stated the CGN cannot assist with this but individual Local Authorities or EA could.

We trust this has been of assistance and should we be able to assist in any way please do not hesitate to contact us.

Bryan Curtis

On behalf of the Coastal Group Network of England and Wales