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National Assembly for Wales
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Dear Chair

ASSEMBLY GOVERNMENT RESPONSE ON COASTAL EROSION AND TIDAL FLOODING

The Clerk requested my advice on the Assembly Government's response of 22 June to the Committee's report on Coastal Erosion and Tidal Flooding Risks in Wales.

The Committee made seven recommendations and the Assembly Government has indicated that it accepts six of the recommendations, and partially accepted the Committee's fifth recommendation which related to communication with citizens and communities on flood and coastal erosion risk issues. The Assembly Government has recognised the importance of effective communication and engagement with citizens and communities and has indicated that it will be developing a communication strategy, complemented by a community engagement framework, to support its new National Strategy for Flood and Coastal Erosion Risk Management. But the Assembly Government is clearly of the view that engagement at the local level can be best achieved by other stakeholder organisations, notably the Environment Agency and local authorities, and this appears to be the reason for the partial acceptance of the Committee's recommendation. Nevertheless, the development at a national level of a clear community engagement framework should help to provide the consistency of approach and alignment of local and national communication that has perhaps been lacking to date.

The Committee's first recommendation requested a detailed response to the seven recommendations in our own report on this topic. Again, the Assembly Government has accepted six of these recommendations, and partially accepted our fourth recommendation relating to the need for clear policy and guidance for local authorities, in particular the provision of better guidance to control inappropriate development. Development in areas at risk of flooding was a matter of concern to several members when the Committee took evidence from the Accounting Officer on 10 February 2010.

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Although not stated explicitly, the Assembly Government's partial acceptance of this recommendation seems to relate to the question of whether better guidance on inappropriate development is required. The Assembly Government points to the Technical Advice Note (TAN) 15 on development and flood risk. This advice note has been in existence since 2004 and the Assembly Government has stated that the evidence indicates that it is working effectively in terms of directing new development away from flood plains. Nevertheless, we consider that for TAN 15 to deal effectively with the new challenge of climate change, developers and planners will need additional guidance on flood and erosion risk. Much of this should come from the new Shoreline Management Plans and better flood risk maps. We also consider that flood and erosion risk should have more closely influenced spatial planning objectives, to help avoid the development control issues that we found in North Wales.

It is clear throughout the Assembly Government's response to both sets of recommendations that it believes that it is already addressing, or will address, these recommendations as part and parcel of work that supports the development and delivery of the new National Strategy, underpinned by the responsibilities set out under the terms of the Flood and Water Management Act, and supported, at least in the short-term, by work that is taking place as part of the European Structural Funds Programme. With that in mind, the Assembly Government has stated that, following a review of progress against its objectives, it anticipates that the New Approaches Programme will be formally closed, with all related work directed as part of the National Strategy.

The work that is going into the development of this new National Strategy should provide the Committee with some assurance that its recommendations are being taken seriously and contributing to a renewed sense of urgency about this issue. However, without yet seeing the detail of the draft strategy, and the work that will flow from it, we cannot be certain whether the actions that the Assembly Government has described will adequately address the concerns that led to the Committee's recommendations, and the recommendations in our report. In particular, it remains to be seen whether the new National Strategy will comprise more than a repackaging of the principles set out in the New Approaches programme and there is still the question of capacity across the Welsh public sector to deliver this agenda. However, the Assembly Government has indicated that the Flood and Water Management Act 2010 should drive improved collaboration and that it has brought forward a new oversight role for the Environment Agency, although this arrangement stops short of the strategic overview role given to the Environment Agency in England to supervise and control capital funding for the implementation of coastal erosion and tidal flood risk management policy on behalf of the Government.

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The Assembly Government has indicated it will be consulting on the new National Strategy for Flood and Coastal Erosion Risk Management this summer with a view to publishing its final strategy before the end of this Assembly. The Committee might therefore wish to take further evidence from the Assembly Government on this matter in late 2011, by which point revised local Shoreline Management Plans should also have been developed, helping to identify which locations and communities are at particular risk from coastal erosion and tidal flooding. The Assembly Government should also have a better idea at that point about the financial constraints that are likely to impact on the investment plan that will support the delivery of the National Strategy.

Yours sincerely



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