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Ms Catherine Hunt  
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22<sup>nd</sup> June 2012

Dear Ms Hunt,

**Written evidence for the National Assembly for Wales Environment and Sustainability Committee's Inquiry into Coastal Protection**

Thank you for inviting the Wales Coastal Monitoring Centre (WCMC) as a stakeholder to contribute to the National Assembly for Wales Environment and Sustainability Committee's forthcoming inquiry into Coastal Protection in Wales.

The WCMC is a Welsh Government funded initiative to inform the flood and coastal erosion risk management (FCERM) process in Wales. Hosted by Gwynedd Council, direction for the WCMC is given by a Project Board which reports to the Wales Coastal Group Forum. Five targets the WCMC aims to improve with regards to coastal monitoring activities are:

- *Communication*  
Develop and enhance a collaborative approach between organisations.
- *Efficiency*  
Highlight potential and realise opportunities for time and cost savings.
- *Consistency*  
Optimise monitoring activities through standardising the National approach.
- *Knowledge*  
Use data and analysis to improve understanding of coastal processes and risks.
- *Advice*  
Develop an evidence base to support management decisions at all levels.

The WCMC project is presently funded to the end of the current financial year, with a business case being produced in application to Welsh Government for a five year funding extension.

Our written evidence to address the terms of reference for the inquiry is presented below and we trust the content will be of interest to the Committee.



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**Assess progress made by the Welsh Government and Welsh flood risk authorities in implementing the objectives of the National Strategy for Flood and Coastal Erosion Risk Management in Wales**

The National Strategy for FCERM in Wales was published on 14<sup>th</sup> November 2011 and a representative from the WCMC attended the launch event in Borth, Ceredigion. The Strategy sets four overarching objectives for FCERM in Wales, being:

- (1) Reducing the consequences for individuals, communities, businesses and the environment from flooding and coastal erosion;
- (2) Raising awareness of and engaging people in the response to flood and coastal erosion risk;
- (3) Providing an effective and sustained response to flood and coastal erosion events;
- (4) Prioritising investment in the most at risk communities.

This first National Strategy establishes a framework for the development of a holistic FCERM system fit for Wales. It aims to increase the nation's resilience to the impacts and consequences of flooding and coastal erosion through communicating with, and embracing the delivery actions of, Welsh Government, Risk Management Authorities and also communities and individuals.

Focus is now moving to implementation of the above numbered objectives, for example:

**Objective (1):**

The coastal erosion map for Wales was completed by the delivery deadline.

Generation of the second edition Shoreline Management Plans (SMP2s) was completed by the delivery deadline.

Local Flood Risk Management Strategy (LFRMS) delivery by 2013 will be achievable as it does not consider coastal erosion in any detail.

My colleagues within Gwynedd Council have established a programme of regular and appropriate maintenance in relation to the Council's own FCERM assets.

**Objective (2):**

My colleagues within Gwynedd Council are currently undertaking community flood risk awareness raising activities.

**Objective (3):**

My emergency planning colleagues within Gwynedd Council are leading on addressing this objective.

**Objective (4):**

The WCMC and Gwynedd Council believe that Welsh Government must lead on the development of a prioritisation system in the near future, with associated guidance for project appraisal and funding allocation.

Further supporting measures and a number of pieces of guidance have also been provided by Welsh Government to demonstrate implementation of Strategy objectives:

**Sustainable Development Guidance**

Under Section 27 of the Flood and Water Management Act 2010 some Risk Management Authorities must consider sustainable development when exercising their FCERM functions.

**Local Flood Risk Management Strategy Guidance**

Section 10 of the Flood and Water Management Act 2010 requires Lead Local Flood Authorities (local authorities in Wales) to develop, maintain, apply and monitor a strategy for local flood risk management in its area.

**Adapting to Climate Change Guidance**

Welsh Government requested the Environment Agency prepare guidance to assist Risk Management Authorities in Wales to adapt to climate change.

**Consider how the objectives of the Strategy are being reflected in Shoreline Management Plans and Local Flood Risk Strategies**

Welsh Government have asked Environment Agency Wales to report to the Minister (under Section 18 of the Flood and Water Management Act) every two years on all aspects of FCERM undertaken by all Risk Management Authorities. The first report will be produced in approximately summer of 2014 and will cover progress up to and including April 2013 to March 2014. Environment Agency Wales and Welsh Government are planning to scope the proposed method of reporting later this year in order to reach agreement before the 2013/14 year starts when the reporting process will be implemented.

The process of generating second edition SMP2s was in its final stages when the National Strategy was published in November 2011 and therefore there is no clarity in SMP2 content with regards to meeting Strategy objectives. Clearly however, setting out a long term management strategy for the coastline helps everyone to make decisions regarding future investment, sustainability etc because 'hold the line' policies give a commitment to continue to defend into the future.

Although SMP2s are non-statutory documents, there may be scope to also include reporting on progress of SMP2 action plan delivery within the two yearly report noted above. If so, perhaps information could be collated from various coastal group annual reports (including monitoring reports) submitted to Welsh Government when claiming grant in aid funding. Any major changes to SMP2s, such as changes to policies or actions being added or deleted, would of course need to be flagged-up through the reporting process. Practically, any future reporting criteria for SMP2 action plan delivery should be the same in Wales and England for simplicity for those coastal groups spanning the national boundary.

With regards to LFRMS preparation, none have been completed in Wales as yet and when they are complete we anticipate there will be very little reference to coastal erosion because their main aim is to consider flooding from ordinary watercourses, surface water and ground water only.

**To gather views on how coastal protection is funded and in what ways this could be improved and to make recommendations to the Welsh Government on how delivery and funding of coastal protection in Wales could be improved.**

**Welsh Government flood and coastal erosion risk management funding for coast protection works**

Funding for FCERM in Wales has more than trebled since 1999 and Welsh Government invested £36 million via the block grant in FCERM in 2009/10. Supplemented by additional funds from the Strategic Capital Investment Fund and European funding, Welsh Government's total FCERM investment across Wales stood at £42million for 2009/10. This was a significant sum, but in the future even more may be required. In recent years access to European funding has enabled the allocation of match funding to facilitate delivery of capital coastal defence projects, such as Tywyn here in Gwynedd and neighbouring schemes at Borth in Ceredigion and Colwyn Bay in Conwy, which may have been unfeasible through Welsh Government funding alone.

The Coast Protection Act (1949) empowers Welsh Government to make grants available to Maritime Local Authorities (MLAs) towards the cost of appropriate capital works carried out under the legislation. The current grant in aid rate ranges from 35% to 75% and above a certain expenditure threshold can be 100%. The aim of the range of grant rates is to acknowledge the financial burden coast protection commitments place on a particular MLA. The rate of grant is calculated specifically for each MLA application and is determined by the MLA's existing burden i.e. its level of expenditure on coast protection schemes in the previous 20 years, and its relative fund raising capacity, which is reflected by the MLA's average Council Tax base Band D properties.

**English FCERM funding for coast protection works**

From 1 April 2008 responsibility for approving and payment of capital flood defence grant in aid across all authorities in England was transferred to the Environment Agency. The Welsh Government has indicated that they do not foresee this decision being adopted in Wales.

In May 2011, The Secretary of State for the Environment in England introduced a new policy, that of 'Flood and Coastal Erosion Resilience Partnership Funding'. This policy describes a new approach to funding projects starting in 2012/13 in England that will reduce flood and coastal erosion risks. The new policy allows FCERM projects to apply for central grant in aid and encourages funding from other sources to be secured. The proportion of central funding that a project receives will depend on the benefits it will bring.

Instead of meeting the full costs of a limited number of projects, under the new approach a proportion of Government funding would be available to any worthwhile scheme. Funding levels for each scheme will relate directly to the benefits delivered. For schemes that qualify for full funding, cost savings or contributions may mean the scheme is delivered sooner, and could release funding to allow others schemes to go ahead. For schemes not fully funded by Government to proceed, either the costs would need to be reduced or the remainder of the funding provided through local contributions.

#### Funding for strategic coastal monitoring works

Since 1992, Welsh Government funding modifications have enabled grant in aid to also fund studies including coastal monitoring activities rather than solely for the delivery of capital coastal defence schemes. Of the four MLA-led strategic coastal monitoring initiatives that presently operate in Wales, Swansea and Carmarthen Bay Coastal Engineering Group chaired by Carmarthenshire County Council receive a grant in aid rate of 35%, Gwynedd Council receive a grant in aid rate of 45%, Ceredigion County Council receive a grant in aid rate of 55% and Conwy County Borough Council receive a grant in aid rate of 65% funding. In 2012, the WCMC estimated the average annual expenditure by Welsh MLAs for strategic coastal monitoring activities in the three year period 2009/10 to 2011/12 to be £169,000 of which £97,000 was grant in aid funded direct from Welsh Government.

For comparison in England however, all strategic coastal monitoring programmes receive the full 100% grant in aid funding. Indications from Welsh Government to date suggest a 100% grant rate will not be offered in Wales, partially in view of concerns that if a MLA is not directly contributing financially, the MLA will have less ownership and interest in the programme. The absence of 100% grant in aid funding in Wales is a significant limitation on the success of any future strategic coastal monitoring programme as each MLA partner will have to source the remaining funds from their own (limited) revenue streams.

Welsh Government has alluded that in the future, MLAs will only be eligible for grant aid funding when their strategic coastal monitoring activities conform to the National programme and guidelines to be generated by the WCMC in due course.

We understand that Welsh Government intend to undertake a review of FCERM funding procedures later in 2012.

I look forward to attending the inquiry on Thursday 5<sup>th</sup> July 2012 with my colleague Emlyn Jones. Please contact me in the interim if you wish to discuss this written evidence further in the interim.

Yours sincerely,



Louise Pennington  
Project Co-ordinator, Wales Coastal Monitoring Centre