



## INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities, the three fire and rescue authorities, and four police authorities are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. This document contains evidence for the Environment and Sustainability Committee for their inquiry into coastal protection in Wales. It considers the progress being made by the Welsh Government and Welsh flood risk management authorities in implementing the objectives of the National Strategy for Flood and Coastal Erosion Risk Management in Wales.
4. The Welsh Government should be commended on the production and publication of the National Strategy and publication of the guidance document for the preparation and production of the Local Strategy for Flood Risk Management, in November 2011. This has helped to give structure to the agencies involved in flood and coastal erosion work.

### **Links between National Strategy objectives, SMPs and Local Strategies**

5. The National Strategy set out four overarching objectives as follows:
  - reducing the impact on individuals, communities, businesses and the environment from flooding and coastal erosion;
  - raising awareness of and engaging people in the response to flood and coastal erosion risks;
  - providing an effective and sustained response to flood and coastal erosion events;
  - prioritising investment in the most at risk communities
6. **Shoreline Management Plans** predate the National Strategy. The preparation of SMPs started in 2009 and consultation took place in 2010/2011. The approach taken

was to consider 3 'epochs', of 0-20 years; 20-50 years; and 50-100 years There are then four options to choose from, which inform the objectives and actions in these plans. These are as follows:

- **Hold the Line** – to provide some level of coastal defence and keep the position of the defence approximately where it is now;
- **No Active Intervention (NAI)** – assumes that no maintenance, repair or replacement of existing defence structures takes place;
- **Managed Realignment (MR)** – is the landward movement of defences, giving up some land to the sea to form a more sustainable defence line in the future
- **Advance the Line (ATL)** – means reclaiming land from the sea by building new defences further seaward.

7. All of the Welsh SMPs are complete, subject to final sign-off by a Quality Review panel. Their actions plans will form part of that review. The four overarching objectives of the National Strategy are clearly relevant to the SMPs but, because of the order of their production, the National Strategy could not be said to have directly influenced their development.
8. The SMP Action Plans will need to be revisited, however, as the work on the Local Strategies progresses. Catchment Flood Management Plans (prepared in 2009/2010) will also need to be revisited.
9. It should be noted that two areas of Wales' coastline are in Coastal Groups which include areas of England. The Severn Estuary Coastal Group covers the coastline from Lavernock Point to Gloucester and from Gloucester to Hinkley Point, Somerset. This therefore includes the South East coast of Wales (from Chepstow to Lavernock Point). In North Wales, the North West and North Wales Coastal Group of Wales includes the welsh coastline from Great Orme's Head to the Dee Estuary, and the North West of England coastline from the Dee Estuary to the border with Scotland
10. In responding to the requirements of Flood and Water Management Act 2010 these two Coastal Groups have to consider the objectives of the respective (English and Welsh) National Strategy documents. The two areas have been following the timetable for England and, as a result, the implementation of their SMP Action Plans is already underway. For the Severn, the Severn Estuary Flood Risk Management Strategy

(SEFRMS) is progressing in parallel. (It should be noted that although 'plans' usually follow 'strategies', in this instance the SMP is effectively the high level policy document for the coast and the SEFRMS is actually the plan of how it is implemented).

11. In relation to the preparation of **Local Strategies**, the Flood and Water Management Act 2010 s10(1) and (2) requires that:
  - (1) *A lead local flood authority for an area in Wales must develop, maintain, apply and monitor a strategy for local flood risk management in its area (a local flood risk management strategy)*
  - (2) *In subsection (1) "local flood risk" means flood risk from –*
    - a. *Surface runoff,*
    - b. *Groundwater, and*
    - c. *Ordinary watercourses*
12. The local authorities are the lead local flood authorities (LLFAs) in Wales and a deadline of March 31<sup>st</sup> 2013 has been set by Welsh Government for each local authority to complete its Local Strategy. The Local Strategies are being developed currently and therefore it is difficult at this stage to show how links with the National Strategy are being made. However, local authorities are certainly undertaking the work in light of the four overarching objectives of the National Strategy. They are also, as appropriate, taking account of and acknowledging Preliminary Flood Risk Assessments (PFRAs) already undertaken by local authorities, the Shoreline Management Plans and Catchment Flood Management Plans in determining 'at risk' communities.
13. The Local Strategies will be high-level documents indicating the principles which will be applied when considering flood risk information. Specific plans for those areas identified at risk will be drawn up based on these principles, in accordance with the Flood and Water Management Act 2010, taking account of other relevant local and national policies.
14. Prior to the March 31<sup>st</sup> 2013 deadline the Minister for Environment and Sustainable Development requires each LLFA to submit a *draft* Local Strategy in December 2012, for 'sign-off'. This timescale for production of these drafts is very tight. To conform to the National Strategy, the Local Strategy must be subject to a Strategic Environmental Assessment (SEA) (and there is a statutory requirement for a 5 week consultation period with Environment Agency, CADW and CCW on the scope for the SEA). When

the SEA has been completed and an Environmental Report produced there is then a statutory requirement for a 6 week consultation on the Environmental Report and the Local Strategy with the Environment Agency, CADW, CCW and the public (run concurrently).

15. **Flood Hazard Maps** (which indicate the depth and velocity of surfacewater flooding) are being prepared by the Environment Agency. However, these will not be completed and available until *after* the March 31<sup>st</sup> deadline. The information contained within these hazard maps will supplement the detail already available from the PFRAs and other local knowledge in identifying areas that are at high risk of surface water flooding. There will therefore be an iterative process as more information becomes available, allowing the level of detail and understanding to be enhanced over time.

### **Are there any barriers to the development of coastal protection in Wales and how these could be addressed?**

16. The main barriers relate to skills/personnel and funding/resources. Capacity building workshops are seeking to address the former, but identification of funding for implementation will be an on-going issue. The current European programmes have provided substantial resources for flood and coastal erosion works and it will be important that such projects continue to be eligible under the new Programmes. There will need to be increased emphasis on community resilience, raising awareness and identifying measures communities can take themselves to reduce risks.
17. There may also be barriers in relation to planning and conservation which may limit the scope for communities to 'migrate' away from the coast over time. Some coastal villages have their economic heart on the foreshore and may be constrained by tightly drawn development boundaries.

### **How effective are current funding mechanisms for coastal protection?**

18. Local Authorities have not always been clear as to how the Welsh Government funding allocation process works. Amongst other considerations there is the issue of balance between inland flood protection schemes and coastal schemes and between funding for local authorities and the EA.
19. Encouragingly, there is currently work underway to develop a 'risk-based' approach with set criteria /procedures to determine how funding is allocated. The WLGA and

local authorities are involved in this work with EA and Welsh Government. As part of this work there may be an opportunity to develop a consistent approach to both coastal and inland flooding. The SMPs consider all sections of the coast on a 3 epoch basis and this encourages long term planning, with consideration of options such as managed realignment or retreat in some areas. The work being undertaken as a result of the Flood and Water Management Act 2010 and the Flood Risk Regulations 2009 may help in this respect, providing the necessary information in relation to inland flood risk.

20. Finally, on this point, Wales' coast is vulnerable because of aged defences and climate change. In addition to properties there is also some major infrastructure at risk. This raises the potential for there to be collaborative and partnership approaches, seeking financial contributions– e.g. from Welsh Government's Regeneration section where appropriate, and other affected stakeholders such as Network Rail, Dwr Cymru/Welsh Water and the Trunk Road Agencies to support coastal protection schemes.

**What is being done to communicate objectives and risks associated with Coastal protection and plans for future communication?**

21. The West of Wales SMP considered the effects of tidal flooding including a worst case scenario, the H++ case of 2m sea level rise over the next century from the UKCIP09 report. This provided a useful benchmark for discussion and public presentation and consultation of the limited options for new defences. For the Severn estuary a substantial consultation took place for the SMP and there was an additional round of consultation for the SEFRMS. Leaflets are planned for each of the Local Authorities regarding the SMP issues and policies for their own areas. Local Authorities will give a commitment within their Local Strategies to engage and consult with those communities at most risk, to identify the most appropriate resolution. There will need to be close liaison with the Environment Agency over communication to ensure a 'joined up' approach.

**What are the views of stakeholders on these different aspects?**

22. Consultation on the SMPs generated a good response, with useful feedback. Consultation on Local Strategies is not scheduled until later in 2012. There has not been an opportunity since the May elections to discuss flood and water issues at WLGA political meetings. However, there is a WLGA event for Environment, Waste and

Transport Cabinet members taking place on 5/6<sup>th</sup> July and flood and water issues are on the agenda.

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