



**(Defend Our Coast Association)
Response
to
Consultation on Coastal Change Policy
June 2009**

Summary

Within its limited parameters, the policy outlined in this document is another step in the attempt by Defra and its responsible agency, the Environment Agency (EA), to engage with the coastal communities whose lives and livelihoods are affected by their actions, and to draw them into the planning and decision-making process. And it contains some promising initiatives that can be explored via the Pathfinder scheme. Both of these are to be welcomed.

However, we are deeply concerned by the limit of its ambition, which implies an attitude to UK coastal defence on the part of Defra and the Environment Agency that might best be described as a resigned acceptance of the inevitable. And we continue to be dismayed by the reluctance of both organisations to grapple with the hard questions that arise from their own gloomy predictions for the future of our coastline.

Overview

We are an island nation. We have almost 5,000 miles of coastline even without counting the numerous islands that form part of the UK. We are facing major challenges in its defence, foremost among them the likelihood that the constant battle between sea and shore will be made worse by the effects of climate change over the next century.

No-one would seek to downplay these problems, or to assume an ostrich-like posture towards them. But our attitude should be one of robust determination, rather than resigned acceptance. An island's coastline is not something to be abandoned without a fight, and our baseline strategy should be focussed on how to finance and conduct that fight, rather than how to soften marginally the impact of its failure.

In 1940 we faced a different but equally serious and seemingly inevitable invasion. Full preparations were made to deal with its consequences. But that did not prevent our determination to stop the invasion in its tracks, even if it meant committing a considerable proportion of our meagre resources to do so. The outcome is history.

Without wishing to belabour the point, we need to see a bit more of that Churchillian resolve from our leaders. The gradual retreat of our coastline is not inevitable. It is a matter of will and the allocation of resources. Holland has a policy, enshrined in its national law, that there will be no retreat from its 1990 coastline, and it will be maintained to a safety standard of 1 in 10,000 years (we're grateful to get 1 in 200).

The argument made by a Government keen to limit its spending, and made again in this document, is that 'We defend where it is sustainable and affordable to do so'. But the formula devised by the Treasury to calculate cost/benefit is designed to undervalue the long-term benefits in relation to the upfront costs, despite research which indicates that every £ spent on flood defence can save £8 in damage. What we currently spend as a nation on flood and coastal defence amounts to less than 3 days spending on the NHS, or one twentieth of one percent of UK GDP. And of that, only about one sixth is applied to defending our coastline.

It's not that we can't afford to defend our coast. Indeed, we can't afford not to. The Defra-commissioned Foresight report in 2004 demonstrated that we need to increase our commitment over time, and that this cannot not be avoided - that to seek to avoid costs now will only lead to greater costs later. The EA itself suggests that one in six homes in England is already at risk. Risk Management Solutions, whose flood damage predictions have proved more accurate than the EA's in the past few years, puts the figure at one in four. At that level there is a growing risk that the number of uninsurable homes will eventually cause a collapse in the housing market.

This is not the place to develop this argument in detail. But it does inform our response to a policy such as the one outlined in this document – which starts from the premise that natural process, exacerbated by climate change, makes it inevitable that we're going to lose significant chunks of our coastline and there's nothing we can do about it. So we might as well explore ways of breaking the news gently to the coastal communities and provide a few initiatives to help them cope with their loss. Except that if the scale of that loss is at the level currently predicted by Defra, it will be like applying Band-Aids to communities whose hearts have been torn out.

Response to Coastal Change Policy document

We have outlined below our specific comments.

Overall we feel that Defra's desire to involve local communities in the planning and decision-making that affects them is to be warmly welcomed, and that the document contains some promising initiatives that can be explored in the pilot scheme.

However, the policy document leaves important questions unanswered. Information is power, and that power still resides firmly in the hands of the government and its agencies. The highly technical nature of environmental and cost/benefit issues and the rules governing 'natural processes' make the debate effectively inaccessible to the layman. There is no specific attempt here to deal with that, and yet it is at the heart of any meaningful local involvement. Nor is there any suggestion that funds will be made available to local communities to specify and undertake their own research, rather than government being exclusively the one that gets to set the agenda. And

there is little here about how the policy will be funded if the pilot scheme is ruled a success – save for several rather ominous references which raise the suspicion, unfairly or otherwise, that part of this process of localisation may be a transfer of costs from central to local level.

Finally there is no attempt to grapple with the single most significant issue around coastal change – that of compensation for the resultant destruction of people’s homes. If Defra’s own predictions are to be believed, then this is no longer something that can be batted away with references to previous Government policy, or a 1949 Act never designed for the circumstances that, according to Defra, we now face. The reckoning can be postponed, but it cannot be avoided. It would be better to open a serious and wide-ranging debate about it now than to ignore it until a wave of panicked and angry voters facing the utter disruption of their family life and the total loss of their major financial asset strikes the Government like a political tsunami.

Comments

2.8 ‘SMPs are developed through consultation with local communities’ Although it is not strictly relevant to this exercise, our experience of the first-generation SMP was that there was no effective consultation with our local community, leading to a designation of Managed Realignment for one section of Romney Marsh which shocked both the community and the District Council (Rother), and has subsequently been reversed. Let’s hope that lessons about effective consultation have been learnt and are being applied to the second generation of SMPs due at the end of 2010.

2.9 Preventing inappropriate new development in flood-risk areas is essential, but it’s dealing with the potential loss of existing housing and livelihoods that’s the real problem.

2.14 ‘provision of defences in one area could interfere with natural flow of beach sediment...and cause greater erosion rates further down the coast’ Any intervention will have consequences. Unless measurable adverse effects can be proven, it should not be used as a pretext for non-intervention.

2.16 The quoted figure of £2.15bn is misleading in a document that is exclusively about coastal defence. The major portion of this money will be directed towards river and inland flooding. The most recent estimate of spending on coastal defence (Contract Journal May 2009) is around £100 million per year over this period.

2.17 ‘We defend where it is sustainable and affordable to do so, but it will not be possible to protect every stretch of coastline’ Maybe not, but should we not be taking a more robust attitude to the defence of our coast, given that we’re an island - proactive rather than reactive, resolute rather than resigned? Tone is important, and it’s not limited to this document. It permeates other key EA texts such as the comically named *Making Space for Water* and *Climate Change – Adapting for Tomorrow*.

2.19 Broadening the range of funding is good, and local authorities should be encouraged to play their part in exploring the options. But we should be wary of the Government seeking to offload its financial obligations on the basis that those most at risk have most to benefit and should therefore bear the brunt of the cost. For an island, coastal defence is a national issue rather than a local one, and you could equally well argue that those in the front line deserve the most support from the centre. Local authorities are already facing serious financial shortfalls, and merely to load them with additional fiscal responsibilities is not likely to have a productive outcome.

That said, it is absolutely right to explore all existing sources of funding, including those available from the EU. But given the acknowledged seriousness of our predicament, we must also think outside the box, exploring more radical solutions for the long-term, such as a levy on all household insurance policies, as is successfully practiced by several of our continental neighbours.

2.22 ‘it will help ensure that impacts that are too difficult to value in monetary terms are still taken into account’ If this means that the current formula for assessing cost/benefit will be superseded by a more holistic approach that seeks to assess impacts on lives and livelihoods, we are all in favour.

2.26 Maps showing coastal erosion and flood risk may help inform purchasing decisions, but for those who already live there they merely make their properties uninsurable. This is an example of one person’s solution being another’s problem. It also increases the chances of large swathes of the coast becoming effectively blighted on the basis of (not always accurate) computer modelling.

3.1 ‘Local communities need to be informed, engaged and enabled to take an active part in deciding what happens locally’ This is a welcome step forward, and a major attitudinal shift from a few years ago.

3.8 There will be many respondents much better qualified to comment, but is a total of £11m up to April 2011 sufficient to enable the Pathfinders to make a significant impact in the areas outlined? Presumably it depends on how many of them the fund will be divided between, but it feels as though a significant amount of infrastructure will be necessary to set up a range of schemes and administer, monitor and report on them – and that’s before any funds are expended on the schemes themselves.

3.19 We have already expressed our view of this disclaimer. At least the document does not seek to evade the issue. But the stance taken is politically unsustainable in anything other than the short term, given the degree of public fury that will be unleashed when its effects spread beyond a few isolated instances to the wider coastal community. There is also a serious issue of potential discrimination under Article 14 of the Human Rights Act 1998, in that the quoted Schedule of the Water Resources Act 1991 appears to be applied only in the case of fluvial defence.

3.24 – 3.26 The proposed assistance grant is laid out clearly within its narrowly defined limits, and does at least address the outrageous unfairness of householders having to pay to demolish what remains of their home. However, why offer it and then immediately start making exclusions (buy-to-let, second home)? These are the

very properties that are rented out to holidaymakers and help to sustain coastal districts as attractive tourist destinations. Discouraging their ownership is hardly compatible with the principles outlined in 5.14 - 5.15 and will merely accelerate blight

3.28 This is not, as you seem to imply here, a relatively short-term problem that will be solved by SMPs and national data influencing the markets over time so that coastal property is owned by purchasers whose investment reflects the risks. The vast majority of coastal property owners purchased their houses in good faith at a time when they were given no reason to suppose that the longstanding policy of holding the line would ever be reversed. In the present circumstances they will find it increasingly difficult to sell at a price that enables them to move.

4.3 - 4.4 We endorse the spirit that is enshrined in the principles of community adaptation planning and engagement (CAPE). Whatever our differences about scale and ambition we can certainly unite around the importance of partnership. Whatever initiatives are planned will be more likely to take root and make a difference if Government agencies and local communities work on them together. The Suffolk Coast ICZM, for example, feels like a good template for involving the local community and feeding their input into the SMP and more detailed policy initiatives.

4.8 You are right to acknowledge the value of local groups in forming bridges between agencies and communities, and in facilitating the flow of ideas and feedback in both directions. DOC (Defend Our Coast) is a good example of this – a Romney Marsh group that draws on local expertise and is working closely with the EA on behalf of the Marsh communities to ensure that the special characteristics of this area in terms of both coastal defence and land drainage are fully understood, and its unique heritage preserved for future generations.

4.10 Participatory budgeting (PB) sounds like another effective and practical way to turn the principles of CAPE into reality, although it's hard to see how it would function without local as well as centrally allocated capital spending budgets.

4.12 - 4.13 These findings on what communities look for in CAPE are helpful, and we look forward to the issuing of your draft guidance (**4.14**). We agree with your approach of drawing lessons from case studies, as the practical and proven is likely to be more valuable than the general and theoretical. We also agree with the presentation of a range of models and ideas that different communities can consider in the light of their own circumstances.

4.16 Again, we welcome your acknowledgement of the expertise of local people as a resource to be tapped. This is particularly true of coastal communities, whose knowledge of the onshore effects of local winds and tides can prove more accurate than computer modelling. We think it would be very worthwhile to explore how the New Deal for Communities and Neighbourhood Management programmes, which appear to have enjoyed some success in transferring budgetary and decision-making responsibilities to local groups elsewhere, could be applied to coastal communities.

4.17 - 4.18 Local organisations such as DOC have an important role to play, both in the targeting of initiatives that are of genuine local value, and in engaging and

informing the community. As you have pointed out, they bring to the table several valuable resources – their time and energy, and their expert local knowledge. You should consider requesting that the Pathfinders set aside small sums of money to help with their administration, expenses and equipment costs. Fund raising on such a local scale is hard to achieve, and a grant to buy, say, a laptop and overhead projector that enables them to carry the message to parish councils throughout the area would be a worthwhile investment.

4.22 The problem of deterring inappropriate development in areas at risk, whilst not discouraging the economic and social viability of the local community, is a hard circle to square. Again, however, there is a need to reach out for more radical solutions than merely juggling the planning laws. The respected environmental journalist Richard Girling, in an article in the Sunday Times Magazine entitled Home and Dry (16 August 2009), describes a range of housing solutions from the traditional (stilts) to the high-tech (the recent development at Maasbommel in Holland which features houses that float on their foundations). Last year RIBA and the Norwich Union (now Aviva) ran a design competition ‘Flood-proof houses for the future’. These are areas we should be exploring.

5.11 - 5.12 We welcome the idea of ‘buy-and-lease back’, which is the first tentative step towards engaging with the problem of the destruction of coastal property (although it is not entirely clear whether it is envisioned for homes as well as businesses). To be effective it would need to be based on full market value, rather than some assessment of ‘impaired’ or ‘residual’ value which would merely cement the blight in place, trapping the owners in situ and providing no opportunity for the rebuilding of lives and livelihoods. And, like almost all the initiatives in the document, it is targeted at the long timescale of coastal erosion, which is only one (albeit a very significant one) of the ways in which coastal property can be put at risk. A decision to retreat existing sea defences as part of a managed realignment, putting several hundred houses at immediate risk, would have a much more sudden and brutal effect on the community concerned, and would not allow for this sort of long-term planning.

5.14 - 5.26 We agree that local businesses are an essential element of the social and economic health of any region, including a coastal community. And ‘rollback’ is certainly an option where the business (e.g. a caravan park) is effectively mobile. However, we do not see anything of much substance in this section, beyond encouraging local councils to take a more sympathetic view on the planning front and pointing businesses at a range of schemes that already exist, such as RDAs and Business Link.

5.27 - 5.34 Again, we agree that local infrastructure - from water, sewerage, drainage and power to public facilities such as footpaths, car parks and beach access - are part of the glue that hold coastal communities together. We would encourage use of funds from the scheme both to identify the extent of the problem (e.g. by mapping buried infrastructure) and to manage and maintain assets going forward. However, we are not sure how feasible this will be at the funding level envisaged.

5.35 - 5.41 This is probably not the place for an examination of the interface of human and environmental interests in our coastal communities. However, it is worth

saying that any chance of ‘winning hearts and minds’ stands very little chance of success when communities are faced with a seemingly all-powerful and unaccountable organisation like Natural England, which operates under a series of statutory powers, often granted by the EU, whose verdicts no-one is allowed to challenge or question, which takes no account whatsoever of human interests, uses designations like SSSI and SAC as weapons of control and constantly intervenes to make effective coastal defence more difficult to achieve. An organisation which suggests in all seriousness that 25 square miles of the Norfolk Broads (including six villages) should be allowed to flood to underline the impact of climate change. Or, on a more modest but none the less arrogant scale, submits written evidence to an EA consultation suggesting that ten historic cottages should be flooded and destroyed to release the shingle underneath them. Adaptation, we suspect, is not a word that they would recognise as being in any way applicable to them.

5.42 - 5.49 The measures suggested in relation to coastal heritage assets are sensible, and demonstrate ways in which the fund might be used as seed money to marshal community support for a project which could then attract further funding (e.g. the resiting of Clavell Tower). We would, however, suggest that ‘heritage’ should not be taken only to apply to individual assets such as buildings. Coastal areas of unique interest such as Romney Marsh or the Norfolk Broads are also part of our national heritage, and perhaps Pathfinders from those areas could pool part of their funds to explore joined up ways across county and local authority borders to preserve that heritage for future generations.

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