

National Assembly for Wales
Public Accounts Committee

Coastal Erosion and Tidal Flooding Risks in
Wales

May 2010



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Public Accounts Committee

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Lorraine Barrett	Labour	Cardiff South and Penarth
Jeff Cuthbert	Labour	Caerphilly
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Contents

Chair's foreword	5
The Committee's Recommendations	7
1. The current approach to coastal erosion and tidal risk management is not sustainable, particularly in a future where the risks to communities and assets are likely to increase considerably as a consequence of climate change.	9
2. The Welsh Government is aware of the need to change its approach but it has been slow in implementing change and has yet to effectively communicate the implications of this to coastal communities in Wales or to provide a strategic lead to key stakeholders in taking a more risk-based approach forward.....	12
There is a consensus that the Welsh Government is moving in the right direction, but key agencies lack the detail required to deliver this change of approach on the ground	12
Communication with coastal communities and citizens needs to be improved.	14
There is a need for urgency in adopting a new approach	16
The current approach to assessing schemes is complex, lacks transparency and needs to take account of risk-based alternatives earlier in the process	17
There is too much focus on capital projects and more work needs to be done to manage the balance between capital and revenue funding and resources	18
The Welsh Government's capacity to deliver a new approach has been questioned	20
3. The Flood and Water Management Act provides an opportunity for the Welsh Government, with its partners, to step-up its approach to coastal erosion and tidal risk management and to reinvigorate its approach with a sense of urgency.	21
4. Recommendations	23
Witnesses	25
List of written evidence	26

Chair's foreword

Coastal erosion and tidal flooding is an issue that already faces many communities along the coastline of Wales. What has been made clear in the Auditor General's report on this issue is that the current approach to dealing with the risks this poses to communities and assets is not sustainable and that urgent action needs to be taken to make the case for moving away from a defence-orientated approach to a more innovative risk-based approach to managing coastal erosion and tidal flooding.

The Welsh Government recognises that this is the right direction of travel, and it launched its *New Approaches Programme* (the 'NAP') in 2007 to manage this change in approach. In the three years since the launch of this programme it has made little headway. We were told by the Welsh Government that this is because other work overtook this programme, and that elements of the New Approaches Programme ended up as part of other work streams. However, we found that there was a lack of clarity over the Welsh Government's approach, whether under the NAP badge or not, and that key stakeholders, such as the Environment Agency Wales and some local authorities, were left without a clear idea of the Welsh Government's approach, or how it should be implemented.

What we have found is that the Welsh Government needs to start communicating the difficult realities, as well as the opportunities, of adopting a risk-based approach to managing coastal erosion and tidal flooding risks to the communities that will be affected. Urgent action is needed if citizens are going to have sufficient time to plan for what could be major changes to their way of life. In the starkest terms, some communities that are currently protected by coastal defences will have to retreat in the future, abandoning property and land to the sea. We may arrive at this position in tens rather than hundreds of years.

The Welsh Government must offer strong leadership on this issue by outlining what needs to be done, by whom and by when and the associated costs of this action. The Flood and Water Management Act may provide a framework and a renewed impetus for the Welsh Government to take this forward. This can only happen if sufficient resources are in place to undertake this work.

The Sustainability Committee of the National Assembly for Wales recently found that communication with communities affected by flooding needs to be improved in Wales and it also urges the Welsh Government to act with a greater sense of

urgency in its approach to addressing flooding risks¹. These are two themes that also stand proud in the Auditor General's report and in the evidence we received during our inquiry. We believe that the Sustainability Committee's work on flooding, when considered alongside this report and the work of the Auditor General sends a clear and strong message to the Welsh Government - communication needs to be improved and the government must inject its approach to addressing flooding risks with a sense of urgency

The Public Accounts Committee, as a guardian of the public purse, will be working with the Wales Audit Office to monitor progress in this area, to ensure that value for Welsh taxpayers' money is being delivered as the Welsh Government and its partner agencies respond to the challenge of managing coastal erosion and tidal flooding risks in the future

¹ National Assembly for Wales Sustainability Committee, *Inquiry into Flooding in Wales*, February 2010

The Committee's Recommendations

Recommendation 1. We recommend that the Welsh Government provides the Public Accounts Committee with a detailed response to the recommendations made in the Auditor General for Wales's report on coastal erosion and tidal flooding risks in Wales.

Recommendation 2. We recommend that the Welsh Government clearly outlines what a risk-based approach looks like to stakeholders and the steps it is taking to deliver this.

Recommendation 3. In meeting recommendation 2, the Welsh Government should also:

- make a qualified assessment of the affordability of implementing this risk-based approach;
- ensure that sufficient resources, including financial and the necessary technical and project management capacity is made available;
- as well as considering its own internal resourcing, it should consider making best use of the expertise that exists within the EAW and other agencies such as the IDBs; and
- employ a directive leadership style that ensures the momentum of change and delivery of sustainable long term solutions

Recommendation 4. We recommend that the Welsh Government states whether the New Approaches programme still exists, and how the objectives first set out under this programme align with subsequent developments e.g. the response to Pitt.

Recommendation 5. We recommend that the Welsh Government constructs and rolls-out a programme for communicating the general implications of a change in approach so that the citizens and communities that are at current or future risk can start to consider what a move away from the traditional defence-orientated approach means in reality. This programme should be rolled out across Wales, and not be restricted to specific coastal erosion or tidal flooding prevention schemes.

Recommendation 6. We recommend that the Welsh Government develops a transparent methodology for the assessment and prioritisation of coastal protection schemes so that citizens and communities can clearly understand the decisions that are made. This methodology should ensure consideration of risk-

based alternatives to traditional defence schemes alongside considerations of proposals for traditional approaches. Risk-based alternatives should not only be considered when a traditional approach is deemed unaffordable.

Recommendation 7. We recommend that the Welsh government outlines its timetable for the publication of a national strategy for flood and coastal erosion risk management, under the Flood and Water Management Act, and the steps it has already taken to prepare for the publication of this strategy.

1. The current approach to coastal erosion and tidal risk management is not sustainable, particularly in a future where the risks to communities and assets are likely to increase considerably as a consequence of climate change

1. The Auditor General's report, *Coastal Erosion and Tidal Flooding Risks in Wales*², found that current arrangements for the management of coastal erosion and tidal flooding "*cannot keep pace with environmental changes*"³. The current approach remains focused on fixed infrastructure i.e. investment in hard defences designed to hold back the sea. These hard defences are expensive to build and maintain and have a limited lifespan. The Auditor General's report points towards the need to move to a more risk-based approach that utilises a range of techniques to manage coastal erosion and tidal flooding, particularly in light of the increasing risks faced as a consequence of climate change⁴.

2. The cost of maintaining existing coastal defences in Wales is estimated at £15 million a year⁵. Estimates have indicated that the cost of damage from flooding will at least double and could increase as much as twenty-fold in the next 80 years⁶. The Wales Audit Office estimate that the damage caused by flooding could increase to a cost of £1.4 billion a year in Wales within the next century⁷.

3. The Auditor General identified examples of risk-based solutions, including 'softer' engineered solutions such as beach re-nourishment (where sand is added to raise the height of beaches) managed realignment and making properties more resilient, that can be employed alongside more traditional defence orientated schemes to provide longer-term sustainable coastal protection.

² Auditor General for Wales, *Coastal Erosion and Tidal Flooding Risks in Wales*, 29 October 2009

³ Ibid p.12

⁴ Ibid p.14

⁵ Ibid p.39

⁶ [The Office of Science and Technology, Foresight Future Flooding: Report on flood and coastal defences, 2004](#)

⁷ RoP 19 November 2009 c.59

Soft coastal engineering solutions⁸

There are already many examples of 'softer' coastal engineering practices in Wales where schemes are designed to work with natural processes to protect the coast from erosion. Techniques used include **beach re-nourishment** where sand is used to raise the height and therefore the natural defence capability of beaches.

Managed realignment is a more radical option and is less commonly used but is an important soft engineering coastal defence technique which aims to achieve sustainable flood defences that reduce the impact of wave action on coastal defences by recreating eroded saltmarsh and mudflat habitat. This is done by creating new defences further inland and allowing the existing defence line to breach and the land to be tidally inundated. Managed realignment is also known as 'setback' and 'managed retreat'. Presently, there are no examples of managed realignment on the Welsh coastline, although consideration is expected in future decades as climate changes take effect.

Managed realignment can also allow the creation of intertidal wetland habitats that support a wide variety of life. The new habitats created by managed realignment schemes may offset the loss of natural intertidal habitats from development pressures, pollution and land reclamation.

Source: Wales Audit Office

4. The evidence we received from the Environment Agency Wales ('the EAW') supported the Auditor General's findings. In terms of the need to change the approach to managing coastal erosion and tidal flooding risk, the Chief Executive of the EAW told us that:

"[...] we cannot continue to protect all people under all circumstances from all types of flooding. While we will continue to build flood defences, we need to look at other ways of protecting people from flood risk—for example, by warning, by increasing resilience and by ensuring that development does not take place in areas of high flood risk. It is looking at flood risk in a broader way and accepting that merely building bigger and bigger defences is probably not going to be economic, and, indeed, brings risks in its own right, because if large defences are either overtopped or breached, the dangers can be even greater."⁹

5. In its written evidence the EAW wrote that it believes "the move from Flood Defence to Flood Risk Management is the way forward to deal with increasing flood and coastal erosion risk."¹⁰

⁸ Table appears as Figure 6 on page 20 of Auditor General for Wales, Coastal Erosion and Tidal Flooding Risks in Wales, 29 October 2009

⁹ RoP 27 January 2010 c.7

¹⁰ Environment Agency Wales, Response to issues raised in the Wales Audit Office report on coastal erosion and tidal flooding risks in Wales, 27 January 2010 p.2

6. This written evidence also provided us with another angle from which to view the impact climate change is likely to have:

“Communities that live behind good coastal defences that currently protect them against a 1 in 100 chance flood would have protection as low as a one in five chance by the end of the century under a 'business as usual' policy”¹¹

7. This picture becomes starker when juxtaposed with the fact that there is no legal duty to build defences for the protection of people and assets and the Auditor General found that there are no policies in place to compensate those threatened by coastal erosion and tidal flooding. We heard that there is still a perception within some communities that coastal protection will continue ad infinitum¹².

8. We believe that the case for a significant change in approach is accepted by most of the agencies involved. Difficult decisions will need to be faced in making this change. It is our view that making a planned and controlled change to the way in which we manage coastal erosion and tidal flooding risks now is the prudent way in which to proceed. We acknowledge, and welcome, the Welsh Government's acceptance of this¹³.

¹¹ Ibid p.1

¹² RoP 27 January 2010 c.194

¹³ RoP 10 February 2010 c.20

2. The Welsh Government is aware of the need to change its approach but it has been slow in implementing change and has yet to effectively communicate the implications of this to coastal communities in Wales or to provide a strategic lead to key stakeholders in taking a more risk-based approach forward.

There is a consensus that the Welsh Government is moving in the right direction, but key agencies lack the detail required to deliver this change of approach on the ground

9. The evidence we received reinforced the Auditor General's conclusions that there is a gap between the Welsh Government's high-level policy objective of moving to a more risk-based approach to flooding, initially under the banner of the NAP, and the realisation of this on the ground.

10. The Auditor General's report and the evidence we received has shown that the key delivery agencies on the ground need more direction from the Welsh Government, and that they have been waiting for this direction since the launch of the NAP in 2007. The Welsh Government has told us that the NAP was taken forward under several different banners. Despite this, local authorities and the EAW remain unclear about what this policy change means on the ground, regardless of the banner under which the Welsh Government has attempted to communicate it.

11. The EAW told us that "There are high-level objectives with this change of approach. What is missing at present is the translating of that into the more practicable on-the-ground actions."¹⁴

12. The Chief Executive of the Environment Agency Wales said that there was a need for more clarity and that specifically the Welsh Government needed to be "[...] absolutely clear about precisely what objectives need to be delivered and by whom and by when."¹⁵

13. In addition to the EAW, we took evidence from two maritime local authorities and an internal drainage board (an 'IDB'). Dean Jackson-Johns, the Chief Executive Officer of Caldicot and Wentlooge Levels Internal Drainage Board, described his experience of the NAP:

¹⁴ RoP 27 January 2010 c.19

¹⁵ RoP 27 January 2010 c.21

“The document is there, but what there has failed to be—and this is not a criticism—is any action on the ground with local communities, local authorities and the IDBs, to deliver its goals. To summarise, it is a commendable document, but it needs more resources if it is to be implemented.”¹⁶

14. Mr Jackson-Johns’s experience was echoed by Geraint Edwards, Head of Environment at Conwy County Borough Council:

“I would like to make the point that there is a consensus of opinion on the New Approaches programme in terms of support. However, I am concerned about translating that programme into work on the ground.”¹⁷

He further described the NAP as “lacking substance”.

15. The Accounting Officer, Clive Bates, Director General Sustainable Futures for the Welsh Government, accepted some responsibility for “a little confusion in this area”¹⁸. This is because he announced, at our meeting on 10 February 2010, that the NAP “[...] has been subsumed by a new agenda that was established in the wake of the 2007 floods and became the Pitt agenda.”¹⁹ Mr Bates explained further that “[...] in a sense, we have almost left the New Approaches programme behind without explicitly doing so” whilst again acknowledging that “I do not think that we have explained ourselves that well with regard to the fact that that has happened.”²⁰

16. When pressed further on the current status of the NAP, Mr Bates responded by saying:

“That is a good question. It might be something for us to look at. Perhaps we should say, ‘We have moved on, we are responding to Pitt, we have the Flood and Water Management Act, and we have the EU funding programme and so forth’. What we are doing is absolutely consistent with the objectives of the New Approaches programme. The Minister has made statements in which she has reinforced the fact that what we are doing is consistent with that. I would accept that the clarity on what we are doing now and the New Approaches programme is not as sharp as it might be, and that is for us to think about.”²¹

We are left unclear as to the current status of the NAP as Mr Bates has not categorically outlined the Welsh Government's position.

¹⁶ Ibid c.130

¹⁷ Ibid c.155

¹⁸ RoP 10 February c.54

¹⁹ Ibid

²⁰ Ibid c.55

²¹ Ibid c.126

17. In lieu of a further investigation of the work streams that superseded the NAP we are unable to comment on the extent to which they have incorporated the aims of the NAP under a different banner. What we can be sure about is that, regardless of the branding, more needs to be done by the Welsh Government to clarify the practical realities of what delivering a more risk-based approach to coastal erosion and tidal flood risk management looks like on the ground to its service delivery partners, particularly the EAW, local government and the IDBs.

18. Our impression of the Welsh Government's position is that it believes that there has been a general direction of travel in broadly the right direction through a number of different schemes (none of which were aimed specifically at coastal erosion and tidal flooding). We do not consider this to be a suitably rigorous approach to an issue such as coastal erosion and tidal flooding, especially when a programme of work, the NAP, was established to address an identified need. If there was decision to supersede the NAP then it should have been clearly communicated alongside the controlled closure of the NAP and the establishment of a new policy vehicle to take forward the programme of work relating to flooding risks in Wales.

Communication with coastal communities and citizens needs to be improved

19. A core area of concern to both us and the Auditor General is the apparent lack of urgency on the part of the Welsh Government to address this issue, particularly in engaging with the communities that may face some of the more difficult consequences implicit in moving to a risk-based approach.

20. We heard from both the Environment Agency Wales and the Welsh Government that communication with citizens and communities is underway, and that further work is being done to gauge how best to communicate risk to coastal communities and to better understand the risks these communities face. The Welsh Government is waiting to complete a study of the detailed risks that face coastal communities in Wales before consulting more fully on the implications for those communities.

21. The findings of the Auditor General, and the experiences of the witnesses we heard from, do not accord with this position. Whilst we accept that detailed communication cannot take place without a full understanding of the risks each community faces, it is possible to start communicating the realities of moving to a risk based approach in general terms.

22. Mr Jackson-Johns, in responding to our questioning, provided his view on the level of communication there has been with the communities he serves in South East Wales:

“It is happening, but not to the extent that we feel that it should be. There should be community meetings, and meetings with local villagers. That sort of thing should be happening. We are all professional people here, and we know what we are on about, but a lot of the public do not really know what is happening. They see a flood on the news, and see that it is terrible and traumatic, but they do not know where to go to get the answers. We have all these strategic documents, which are very commendable, but it is getting action on the ground that is important.”²²

23. Garfield Williams, Assistant Director Engineering at Ceredigion County Council spoke frankly to us about the communication he has had to have with some communities in his area of jurisdiction:

“[...] We are building schemes at the moment, such as the one in Borth, and we are telling people that they have to be mindful that this may be the last time that they will be protected. We are asking them what they are going to do differently and how they are going to mitigate their losses. How are they going to think about the ownership of their property in future? For the people who face a future of retreat at some point—and there are quite a few of those, I would imagine—the truth is quite important for them to mitigate their losses.”²³

24. In stark terms he illustrated the difficulty that exists in communicating the threat faced by some coastal communities:

“Part of our problem in facing the public is that there are people out there who believe that towns such as Aberaeron and Borth, after the next 100 years, will be defended in the same way as the Netherlands. I can say that that will not happen.”²⁴

25. The evidence we received from the Welsh Government shows that its approach to communicating with coastal communities is very much focused around consultations for specific schemes²⁵. Whilst this is necessary, communication need not always be consultative or related to specific schemes. We believe that there needs to be direct communication of the general implications of moving towards a more risk based approach, so that communities can start to re-imagine their futures in light of this change. We recognise that there is a need for both types of communication, but are concerned that only one approach is currently prevalent in the Welsh Government’s actions.

²² RoP 27 January 2010 c.142

²³ Ibid c.168

²⁴ Ibid c.194

²⁵ See RoP 10 February 2010 c.65 and 69

There is a need for urgency in adopting a new approach

26. The Auditor General found that:

“A distinct lack of urgency is evident so far in the New Approaches Programme. However, the Agency and the local authorities we spoke to do not share the Assembly Government’s lack of urgency and told us they have concern about both the very slow pace of change so far and the timeline for future changes.”²⁶

The evidence we took from the Welsh Government supports the Auditor General’s comments, as did the evidence we took from the EAW and the other witnesses. The difference in their respective sense of urgency was marked.

27. The EAW’s understanding, put forward by Mr Mills, is clear:

“[...] current flood risk is significant, and, with climate change, that risk will increase significantly. It is important that we work at pace, developing this work as quickly as possible.”²⁷

28. Ceredigion County Council’s written evidence suggests that coastal erosion and tidal flooding requires a more urgent response due to its potentially catastrophic consequences:

“There may be a case for defining the aims and objectives more quickly in relation to coastal flooding and erosion as the consequences of failure could be catastrophic and the timeframe for individuals to plan and react are more critical.”²⁸

29. This need for urgency was further emphasised by Ceredigion’s Assistant Chief Engineer:

“[...] the time for people to plan and think about retreating, or mitigating their losses, is upon them. The policy has already changed, in the sense that there is no certainty that the people behind ongoing schemes can expect to receive funding in future.”²⁹

30. The Welsh Government stated that it is not complacent on this issue and that it recognises the “potentially troubling view of the future” that we are faced with. In full, the Welsh Government’s Director General Sustainable Futures said:

“There is no complacency about this. We are heavily engaged in the process of adaptation to climate change. The risks are formidable and they were analysed in some depth in the Foresight ‘Future Flooding’ report,

²⁶ Wales Audit Office, *Coastal erosion and tidal flooding risks in Wales*, October 2009 p.49

²⁷ RoP 27 January 2010 c.9

²⁸ Ceredigion County Council, Paper to the PAC, January 2010

²⁹ RoP 27 January 2010 c.126

which painted a potentially troubling view of the future. As the sea level rises and as we expect more extreme weather—storm surges, storms, and so on—the risk of a given defence of a given height being overtopped will gradually increase over time. That is a fact [...]”³⁰

31. Later, in the same evidence session, the different perception of urgency held by the Welsh Government was made clear:

“[...] no-one is really envisaging any sort of realignment for the major settlements for the next 50 years or so. So, people can breathe easy—or they will be able to once they [shoreline management plans] are published. It is not a guarantee, but that is where it is heading.”

32. We believe that more urgency is required on the part of the Welsh Government. We heard from officers on the ground that they are already having to start talking in terms of a future where some communities will not be defended. The earlier communication is initiated and action is taken the better the chance coastal communities will have in building resilience and facing the challenges posed by increasing risks.

33. Fifty years is not long when investments in land, property and infrastructure are considered. In the most extreme cases there is the possibility of managed retreat of communities within decades. Communication must start as soon as possible, and the Welsh Government needs to raise the priority of its response to this threat and the speed with which it is acting to mitigate it.

The current approach to assessing schemes is complex, lacks transparency and needs to take account of risk-based alternatives earlier in the process

34. The Auditor General found that stakeholders, such as local authorities, found the assessment and selection criteria used by the Welsh Government to appraise their bids for coast protection grant-in-aid “very complex”³¹ and that the process lacks transparency.

35. It is important that the Welsh Government looks to make the process for assessing schemes as transparent as possible. It should be mindful of the Auditor General’s findings that delays caused by the complexity of current arrangements can put significant sums of public money at risk³².

36. From the evidence we took from the EAW we heard that it has a methodology for “[...] assessing the costs and affordability of building defences to cope with

³⁰ RoP 10 February 2010 c.14

³¹ Auditor General for Wales, *Coastal erosion and tidal flooding risks in Wales*, October 2009 p.38

³² Ibid

certain predicted risks that go forward”³³. This approach remains tied to a focus on purely defensive schemes. We asked the EAW for details of its methodology for assessing risk-based alternatives to these defensive schemes. The EAW told us that it does not have a methodology for this and that it considers risk-based alternatives to defensive schemes at the point at which the decision is made that a defensive scheme is not affordable:

“We do not have a methodology for doing that, other than you come to that conclusion if you decide that you can no longer afford to defend a place.”³⁴

37. To ensure the value for money of any coastal erosion and tidal flooding management scheme, risk-based alternatives should be considered alongside proposals for more traditional defence-orientated schemes and not only at the point where it is decided that a defence-orientated scheme is unaffordable.

There is too much focus on capital projects and more work needs to be done to manage the balance between capital and revenue funding and resources

38. A key challenge in moving to a more risk-based approach to coastal erosion and tidal flooding risks is managing a shift in resources away from capital funding towards more revenue-based schemes.

39. The current approach to funding remains capital and scheme focused, as we touched upon earlier in this report. Ceredigion’s Assistant Chief Engineer told us that one of his concerns is that the current approach is too “scheme and funding based”³⁵ and that he felt:

“The future is about revenue; if we are to respond more, mitigate more and consult more, we will do that in places where we are not going to build schemes.”³⁶

40. This focus on capital funding can have a consequential dis-benefit; that of eroding corporate memory and expertise. Mr Williams told us that the staffing levels are linked to capital schemes:

“[...] the number of staff you have on coastal protection depends on how many schemes you get, because you justify it out of that capital spending.”³⁷

³³ RoP 27 January 2010 c.91

³⁴ Ibid c.92

³⁵ RoP 27 January 2010 c.168

³⁶ Ibid c.189

³⁷ Ibid c.228

41. The Welsh government recognises that the balance between capital and revenue funding needs to change and it is committed to orientate funding appropriately to accommodate this shift:

“It is true that the balance between capital and revenue will change. As we get the shoreline management plans and catchment flood management plans, we will orientate the funding so that it fits the actions that are coming out of those risk-based planning models”³⁸

We were also told by the Welsh government that it is taking steps to get a better understanding of the balance between capital and revenue activities³⁹.

42. A sense of the scale of this issue, and the need to take action, did not come across from the Welsh Government. Andy Phillips from the Wales Audit Office provided useful context to this aspect of our consideration:

“During the research for the project, we did a quick survey of local authorities, and the revenue budget for each of the authorities was part of this survey. Authorities like Newport, which is an area with quite a high risk of tidal flooding, had a zero revenue budget, which does not acknowledge that there is a risk or a problem. Other authorities frequently have £20,000 to £50,000 a year to cover this entire problem. It is tiny compared with what they need to do, with climate change on the agenda.”⁴⁰

43. We accept that this is recognised by the Welsh Government as a problem that needs to be resolved. However, the scale of the problem, as revealed by the work of the Wales Audit Office, is startling. The Welsh Government needs to act urgently to ensure that local authorities are well placed to respond to the revenue demands that they may be required to meet in the near future, for example the resources required for the implementation of Shoreline Management plans, responding to the Flood and Water Management Act, Flood Risk Regulations 2009, EU directives and the Pitt review recommendations.

³⁸ RoP 10 February 2010 c.41

³⁹ Ibid c.105

⁴⁰ Ibid c.107

The Welsh Government's capacity to deliver a new approach has been questioned

44. The level of resource within the Welsh Government has also been questioned, and the Auditor General found that there was insufficient capacity for the successful development of the NAP⁴¹.

45. The Chief Executive Officer of the CWIDB told us that he worked very well with the Welsh Government's officials. He also recognised that they faced constraints:

“[...] I appreciate that the Assembly Government's resources are very constrained. It is a small team [...]”⁴².

Ceredigion's Assistant Chief Engineer also raised questions about the level of resource available to the Welsh Government officials dealing with this issue⁴³.

46. The Welsh Government will need to ensure that it has sufficient resources to meet the challenges Wales faces from coastal erosion and tidal flooding risks. As well as considering its own internal resourcing, it should consider making best use of the expertise that exists within the EAW and other agencies such as the IDBs.

⁴¹ Auditor general for Wales, *Coastal erosion and tidal flooding risks in Wales*,

⁴² RoP 27 January 2010 c.134

⁴³ Ibid c.189

3. The Flood and Water Management Act provides an opportunity for the Welsh Government, with its partners, to step-up its approach to coastal erosion and tidal risk management and to reinvigorate its approach with a sense of urgency.

47. We heard from both the EAW and the Welsh Government that the Flood and Water Management Act ('the Act'), when enacted, will provide the opportunity to address some of the concerns raised by the Auditor General.

48. We agree that the provisions in the Act for publishing a national strategy for coastal erosion and tidal flood management may assist in more clearly defining roles and relationships, as well as providing a coherent communications plan.

49. There has been a semantic conundrum at the heart of this inquiry. The Welsh Government initiated the New Approaches programme in 2007. Shortly after it launched the Pitt Review was launched and much of what had originally been envisaged as being delivered by the NAP has been incorporated into the broader response to Pitt, along with other activity such as preparations of the Act, distribution of convergence funding and other projects.

50. The Welsh Government tells us that it has, for all intents and purposes, abandoned the NAP⁴⁴. However, the Auditor General, the EAW and the local authority witnesses we took evidence from, were not aware of this decision to close the NAP.

51. Ultimately, it would appear that the Welsh Government expects the national strategy that will flow from the Act to act as the overarching driver for implementing a new approach. We are not concerned about the name of the vehicle through which the Welsh Government decides to pursue its policy objectives. We are concerned about its track record in communicating its intentions and its construction of programmes as both have implications for the economy, efficiency and effectiveness with which policies are delivered. We are also concerned that the Welsh Government manages the programme more effectively and that their policies deliver solutions that address future risks sustainably and for the long term. We hope to see an improvement in this regard when it rolls-out the national strategy.

52. An overarching strategy that sets out roles and responsibilities for the management and communication of coastal erosion and tidal flooding risks in Wales has been missing. Whether the Welsh Government decides to persevere with

⁴⁴ RoP 10 February 2010 c.54

the NAP banner or not, there is a need for an overarching strategy and this should be addressed as a matter of priority.

4. Recommendations

Based on our consideration of the Auditor General's report and the subsequent inquiry we have undertaken we make the following recommendations to the Welsh Government:

Recommendation 1 – We recommend that the Welsh Government provides the Public Accounts Committee with a detailed response to the recommendations made in the Auditor General for Wales's report on coastal erosion and tidal flooding risks in Wales.

Recommendation 2 – We recommend that the Welsh Government clearly outlines what a risk-based approach looks like to stakeholders and the steps it is taking to deliver this.

Recommendation 3 – In meeting recommendation 2, the Welsh Government should also:

- make a qualified assessment of the affordability of implementing this risk-based approach;
- ensure that sufficient resources, including financial and the necessary technical and project management capacity is made available;
- as well as considering its own internal resourcing, it should consider making best use of the expertise that exists within the EAW and other agencies such as the IDBs; and
- employ a directive leadership style that ensures the momentum of change and delivery of sustainable long term solutions

Recommendation 4 – We recommend that the Welsh Government states whether the New Approaches programme still exists, and how the objectives first set out under this programme align with subsequent developments e.g. the response to Pitt.

Recommendation 5 - We recommend that the Welsh Government constructs and rolls-out a programme for communicating the general implications of a change in approach so that the citizens and communities that are at current or future risk can start to consider what a move away from the traditional defence-orientated approach means in reality. This programme should be rolled out across Wales,

and not be restricted to specific coastal erosion or tidal flooding prevention schemes.

Recommendation 6 - We recommend that the Welsh Government develops a transparent methodology for the assessment and prioritisation of coastal protection schemes so that citizens and communities can clearly understand the decisions that are made. This methodology should ensure consideration of risk-based alternatives to traditional defence schemes alongside considerations of proposals for traditional approaches. Risk-based alternatives should not only be considered when a traditional approach is deemed unaffordable.

Recommendation 7 – We recommend that the Welsh government outlines its timetable for the publication of a national strategy for flood and coastal erosion risk management, under the Flood and Water Management Act, and the steps it has already taken to prepare for the publication of this strategy.

Witnesses

The following witnesses provided oral evidence to the Committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed in full at [Public Accounts Committee Papers and Transcripts](#)

10 February 2010

Clive Bates Director General, Sustainable Futures,
Welsh Government

Dr Peter Jones Head of Flood and Coastal Risk
Management Branch, Welsh Assembly
Government

27 January 2010

Chris Mills Director, Environment Agency Wales

Alan Proctor Executive Manager for Flood and Coastal
Risk Management, Environment Agency
Wales

John Mosedale Strategy and Policy Manager, Environment
Agency Wales

Dean Jackson-Johns Chief Executive Officer, Caldicot and
Wentlooge Levels Internal Drainage Board

Geraint Edwards Head of Environment, Conwy County
Borough Council

Garfield Williams Assistant Director, Engineering,
Ceredigion County Council

19 November

Jeremy Colman Auditor General for Wales

Andy Phillips Performance Specialist, Wales Audit Office

List of written evidence

The following people and organisations provided written evidence to the Committee. All written evidence can be viewed in full at [Public Accounts Committee Inquiries](#)

<i>Name/Organisation</i>	<i>Document</i>	<i>Reference</i>
Wales Audit Office	Report on Coastal Erosion and Tidal Flooding Risks in Wales	PAC(3) CETF 1
Environment Agency Wales	Written evidence	PAC(3) CETF 2
Caldicot and Wentlooge Levels Internal Drainage Board	Written evidence	PAC(3) CETF 3
Conwy County Borough Council	Written evidence	PAC(3) CETF 4
Ceredigion County Council	Written evidence	PAC(3) CETF 5