

Save Hemsby Coastline Response to the Consultation regarding Reforming our approach to floods funding: Including a call for evidence on: alternative sources of funding; and English devolution and flood risk management.

This submission wishes to put forward the following evidence in response to questions asked in relation to reforms proposed to floods funding by the Department for Environment, Food and Rural Affairs (DEFRA).

Please find below the questions we wish to answer, and evidence provided.

Questions: Responding to the Consultation

Question 1 Would you like your response to be confidential? No

Question 3. What is your full name? Molly Cooper

Question 4. What is your email address? trustees@savehemsbycoastline.org.uk

Question 5. Who are you responding as? (Required) (Select one option only):

- An individual.
- A farmer/landowner ● A local authority
- An environmental group
- An insurance company
- A water or sewerage company
- An internal drainage board

***Campaign Organisation**

Questions: Part 3 – Changing our approach to funding flood and coastal erosion projects

Question 7. To what extent do you agree with our overall proposed approach to funding FCERM projects as set out in Part 3?

● Strongly Agree ● Agree ● Neutral ● Disagree ● Strongly Disagree ● Don't know

Question 8. Please explain your answer to Question 7.

- 1.1 SHC would support a proposal to change the approach to funding FCERM, but fear access to funds could still be problematic, with needs of small locations like Hemsby being overlooked. With focus still on fully funding Hard Defence maintenance and Natural Flood Management, FCERM projects that might not work at Hemsby.

Question 9. Are there any other approaches to funding flood projects you feel would be effective?

- 2.1. For vulnerable communities like Hemsby, there are currently no defences to attenuate the action of the waves, leaving the dunes, homes, infrastructure and the Lifeboat station very vulnerable.
- 2.2. Additionally, property owners have no recourse to funds to enable them to take action to seek safety. All funds available to residents are tied up in their properties.
- 2.3. Funding channelled through local authorities, could provide for planning and options for adaption. Such funding could include resources and compensation to reflect the actual value of properties lost to coastal erosion.

Question 10. You will now be asked about the three principles in turn.

To what extent do you agree that Principle 1 - the first £3 million of eligible project costs to be notionally provided by Defra through a Contribution Free Allowance - described in Part 3 is an appropriate way to fund FCERM projects?

- 3.1. Save Hemsby Coastline would be in favour of the first £3 million of an eligible project's costs being notionally provided by DEFRA, through a Contribution Free Allowance.
- 3.2. This would enable the installation of Fish Tail Groynes¹ in the hope this will slow erosion, to buy residents time to consider next steps.
- 3.3. But even if Fish Tail Groynes were installed, there may well be on-going life-cycle repairs².
- 3.4. Should routine maintenance costs not be covered by the new FCERM funding approach, this could be problematic for locations like Hemsby.

As set out in Part 3, the allocation of funding to a project using these principles would be confirmed once the project has passed through the programme prioritisation step (see Part 4). • Strongly Agree • Agree • Neutral • Disagree • Strongly Disagree • Don't know

Question 11. Please explain your answer to Question 10.

- 4.1. If the programme prioritisation step had a leaning to favour disadvantaged communities and small locations without housing numbers that normally struggle to qualify for traditional FCERM funding, this could be a good thing.

¹ <https://www.geograph.org.uk/photo/3236944>

² https://southerncoastalgroup-scopac.org.uk/wp-content/uploads/2021/01/Groynes_in_coastal_engineering_CIRIA_C793_May_2020.pdf

- 4.2. But FCERM funding up to now for locations such as Hemsby, has been victim to decisions and assessments that seem to be made at some distance from actual processes and experiences of local people at Hemsby.
- 4.3. Among certain authorities, a dismissive approach is applied to residents and owners of chalets, or non-traditional dwellings, even though many are council tax paying residents, in tourist locations that contribute millions to the local economy³.
- 4.4. Such residents have a wealth of knowledge about the coastline and behaviour of the sea and the beach⁴.
- 4.5. In addition to how detrimental a large-scale sea inundation could be on nearby communities and into the Norfolk Broads.

Question 12. To what extent do you agree that Principle 2 - a single basic rate of Defra funding to be 'notionally' applied to all new FCERM project costs above the £3 million Contribution Free Allowance, regardless of their outcomes - described in Part 3 is an appropriate way to fund FCERM projects?

- 5.1. It could be acceptable for a single base rate of DEFRA funding to be applied to new FCERM projects above £3 m. If the base rate would be 90% or 95% funded, above the £3m, this would mean a Risk Management Authority or coastal community would need to seek the remaining 5% or 10% themselves. This could be difficult for smaller locations and communities.

Question 13. Please explain your answer to Question 12.

Question 14. To what extent do you agree that Principle 3 - All FCERM refurbishment projects are fully funded (refurbishment projects are those that restore existing assets that have fallen below designed levels of operation or are at the end of their design life) - described in Part 3 is an appropriate way to fund FCERM projects?

- 6.1. Whilst it is important that all assets provide flood protection effectively, it would seem a focus on hard defences and fluvial flood protection, overlooks coastal locations that do not have sea defences.
- 6.2. Such an approach also fails to assess the evolving power of the sea and erosion processes that threaten to further destabilise vulnerable locations⁵.

³ https://www.broads-authority.gov.uk/__data/assets/pdf_file/0024/132909/Hemsby-Neighbourhood-Plan-Housing-Needs-Assessment.pdf

⁴ <https://www.newcivilengineer.com/latest/forgotten-using-aerial-imagery-to-show-the-extent-of-a-norfolk-coastal-village-lost-to-sea-21-01-2025/>

⁵ <https://www.telegraph.co.uk/news/2025/01/08/norfolk-seaside-village-unbelievable-erosion-two-decades/?msocid=268cec30a49161323330f99aa506608d>

- 6.3. Fully funding hard defence refurbishment could overlook fragile locations, with funds spent on hard defences, depleting resources needed to begin the long, but urgent conversation with communities about adaption.
- 6.4. Funds that fully consider coastal processes in vulnerable locations and fund adaption measures that truly reflect the costs of adaption for communities are also needed.

As set out in Part 3, the allocation of funding to a project using these principles would be confirmed once the project has passed through the programme prioritisation step (see Part 4). • Strongly Agree • Agree • Neutral • Disagree • Strongly Disagree • Don't know

Question 15. Please explain your answer to Question 14.

- 7.1 It would depend on the procedure for prioritisation and whether such requirements take into account influences on nearby locations and vulnerable coastal areas where applicable.

Question 18. Do you think that the overall proposals for funding flood and coastal erosion projects will support the right amount of natural flood management? Are there other proposals you think we should consider? • Agree • Disagree • Don't know

Question 19. Please explain your answer to Question 18.

- 8.1 Natural Flood Management (NFM) approaches can be cheaper and encompass elements that provide a more permanent solution to coastal erosion, than hard defences.
- 8.2. Save Hemsby Coastline would support the proposal for non-risk Management Authorities to apply for Natural Flood Management projects.
- 8.3 But in addition, it would seem necessary to take a holistic approach to locations like Hemsby, which are particularly vulnerable to damaging storm surges. Due to its location on the North Sea.
- 8.4 A NFM approach would need to be accompanied by up-to-date analysis of shoreline retreat/progradation.
- 8.5 It is difficult to immediately favour a NFM approach at Hemsby as there are no means to evaluate wave energy levels or wave heights, to properly assess energy levels and the power of the sea and how this could impact on NFM measures⁶.
- 8.6 NFM projects at Hemsby would need to consider the proximity to the Norfolk Broads and would need to be properly managed to avoid the possibility of sea inundation transmitting damage further inland.

⁶ <https://coastalmonitoring.org/>

- 8.7 NFM has to be considered alongside adaption packages, that recognise the problem, of re-locating coastal residents inland, where they could be placed in locations vulnerable themselves to flood alerts and warnings in the Norfolk Broads.
- 8.8 Proposals also need to consider use of natural materials to create sea defences on the coast, such as in Holland⁷, alongside innovative flood defence measures on the Broads.

Questions: Part Four – Changing our approach to prioritising the delivery of FCERM projects

Question 23. Which of these options do you think that FCERM projects should be prioritised for delivery (select one)?

- 1. Overall FCERM project value for money and flood risk (approach 1)**
- 2. Bolstering projects that achieve priority outcomes (approach 2)**
- 3. Incentives to secure additional partnership funding contributions (approach 3)**
- 4. None of the above**
- 5. Other Question 24.**

Please explain your answer to Question 23.

- 9.1. It is hard to pick just one FCERM priority, because for communities such as Hemsby that are often overlooked because of their characteristics, it is difficult to ascertain how risk is assessed.
- 9.2 To comprehensively assess risk and equip communities with accurate information, it would seem to be necessary to channel funding into regular detailed briefings, regarding sea states and near-shore and beach processes.
- 9.4. In addition to the funding of updating Shoreline Management Plans, regarding rapidly changing coastlines such as Hemsby.
- 9.5 However, an approach that favours bolstering projects that achieve priority outcomes, such as favouring disadvantaged communities, could supported⁸.
- 9.6 Such an approach could account for specific needs and aspects that make it difficult for residents to exercise agency and act themselves to solve the problems they face in managing coastal erosion.

Question 25.

⁷ https://www.linkedin.com/posts/sukanya-thalpati-7389067_the-netherlands-built-a-sea-wall-that-grows-activity-7353107165055791104-m7zI

⁸https://scholar.google.com/citations?view_op=view_citation&hl=en&user=Ez4BqFgAAAAJ&cstart=20&pagesize=80&citation_for_view=Ez4BqFgAAAAJ:L8Ckcad2t8MC

Please rank in order of preference the 5 potential outcomes that could be prioritised through prioritisation

Approach 2 (with 1 being the highest preference and 5 being the lowest preference):

- 1. Deprived areas**
- 2. Specific types of communities, e.g. rural or coastal communities.**
- 3. Local choice**
- 4. Specific types of flood resilience intervention, such as natural flood management**
- 5. Supporting economic growth and the wider economy**

Question 26. Please explain your rankings in Question 25.

- 10.1 An approach that favours the needs of deprived areas, particularly rural coastal communities, and the barriers they face, would seem to be important.
- 10.2 Local knowledge is essential to apply meaningful accessible measures to residents, when faced with powerful, damaging coastal erosion.
- 10.3 All too often, neighbouring urban centres are prioritised for projects, whilst it can be perceived that urban centres are maintained for improvements and sediment accumulation, at the expense of nearby rural locations.
- 10.4 Even though erosion in these locations, could extend damage into urban areas, through unforeseen consequences.

Question 27. Are there any other outcomes we should consider prioritising through prioritisation Approach 2? Page 45

- 11.1 Specific types of communities could be prioritised, due to them lacking the traditional requirements, through smaller number of houses, or higher concentrations of non-traditional dwellings.
- 11.2. With provision of up-to-date analysis of coastal risk assessments, to enable communities to assess how best to conceive and manage adaption.
- 11.3 Alongside regular advice on safety management and continuation of access to essential services, after a coastal erosion episode.

- 11.4 For specific types of communities, like Hemsby a 30 Year Adaption Fund could be established, to assist residents to plan ahead and adapt.
- 11.5 Particularly as the Shoreline Management Plan for Hemsby states that the approach for Managed Realignment for year 2055 – 2105 intends for there to be no defences and for flooding to be allowed to occur up to higher ground⁹.
- 11.6 Therefore, in the medium term, an approach is needed that can sees deprived and/or rural communities as essential assets like vital infrastructure. Worthy of interim defences with funding for measures to enable residents to adapt.

Question 28. Please outline any potential effects of the proposals outlined in Part 4 on groups with a protected characteristic. Page 45

- 12.1. An approach that favours members of rural and/or deprived communities, with residents who are disabled is essential to enable adaption to coastal erosion.
- 12.2. Disabled residents often face double or triple burdens. Managing their disability, which often involves struggling to cope with pain and limited mobility. The physical difficulty with managing severe erosion and accessing means to seek safety and protect cars, which are an essential means of transport. In addition to finding access to essential services extremely difficult after erosion episodes.

Questions: Part 6 – Call for evidence on alternative sources of funding for flood risk management We are interested in views on how national funding for flood and coastal erosion risk management can be bolstered and how more local funding can be raised. With this Call for Evidence, we want to gauge initial views on the broad areas we’re proposing to investigate to identify alternative sources of funding for flood and coastal erosion schemes. We are also seeking views on the principles that should underpin any option that is taken forward. We are not yet asking about views on specific policy proposals. Following this call for evidence, and subject to the views received, we plan to open a further consultation with more concrete proposals.

Question 34. To what extent do you agree with the five areas we are planning to explore to identify alternative sources of funding (outlined in Part 6) – insurance sector, water and sewerage companies, land and property value uplift, local

⁹ <https://environment.data.gov.uk/shoreline-planning/unit/SMP6/6.14>

funding and building on the existing system? • Strongly agree • Somewhat agree • Neutral • Somewhat disagree • Strongly disagree • Don't know

Question 36. Are there any areas that you feel we are missing? Please explain your answer.

- 13.1. It would seem a useful avenue to explore to seek alternative funding, though certain sectors like the insurance industry, have recently expressed concern that funding of coverage of claims relating to flooding could lead the industry to breaking point¹⁰.
- 13.2. Local landowners who take rent for coastal locations but are not requested to fund sea defences, could be approached to take an active financial role in finding solutions. Or Water and Sewerage Companies that have infrastructure that is threatened by coastal erosion in locations such as Hemsby.
- 13.3. But a wider financial approach is also needed, it is already being seen in locations like Hemsby that more and more properties, traditional brick as well as non-traditional are being impacted by coastal erosion.
- 13.4. Innovative solutions to boost resilience should of course be explored, but these efforts will need to be funded by a larger financial package than it appears this consultation is considering.

Question 38. Please outline any potential effects of the alternative sources of funding work on groups with a protected characteristic.

- 14.1. Alternative sources of funding could be obtained to fund research into the particular needs of disabled residents and women. For whom, proposed current solutions, fall far short of adequately enabling them to cope with, and adapt to coastal erosion.

Questions: Part 7 – Call for evidence on local choice, English devolution and opportunities for flood risk management

Question 43. In your opinion, what are the risks and opportunities of devolving some of the flood funding budget to either local or mayoral authorities in the longer-term? How could risks be mitigated? Page 63

- 15.1. There is an advantage to devolving funding to authorities and bodies most knowledgeable about coastal erosion.
- 15.2. But there is a danger this could isolate at-risk communities who are already victim to existing authorities' prejudices regarding housing concentrations or non-traditional dwellings.
- 15.3. In addition, such authorities could favour urban locations and wish to sustain sediment accumulation at the expense of nearby rural communities.

¹⁰ [Investors hitting 'limit' for insuring against UK floods, warns Flood Re chief](#)

- 15.4. Devolving to local authorities could also signify a shifting of responsibility to a local level, while avoiding responsibility at a national government level.
- 15.5. There could also be a postcode lottery where local authorities with means at their disposal and ability to assert needs for resources absorb large amounts of funding, to the detriment of rural, deprived communities.
- 15.6. A solution to the risks outlined above, could be to specify at a national level, criteria and requirements for local funding and FCERM approaches that favour and require funding of rural and disadvantaged communities.
- 15.7. As what needs to be remembered is that what is being managed is coastal erosion and the prevention of damaging effects of inundation.
- 15.8. Such processes happen all along a coastline, and destructive processes at one location, ultimately will transmit to all areas of the coast. This could detrimentally affect much larger populations causing even more communities to suffer the effects of flooding and coastal erosion.
- 15.9. On 22nd December 2024, during stormy weather a storm surge occurred during a Neap tide, with a sea level recorded at Lowestoft of over 3 metres. At Hemsby, damage caused included the collapse of sections of Access Road, placing properties at risk on the Southern Marrams¹¹.
- 15.9. Damage that can be caused by extreme elevated sea levels are concerning, particularly given that the latest State of The Climate Report 2024¹² produced by the Met Office, states that Sea Level Rise has increased by 19.5 cm, since the start of the 20th Century.
- 15.10. If funding is be devolved to a local level, it will need to be underpinned by a more ambitious funding model. Capable of taking a whole coastline approach using detailed information on coastal bathymetry, sea level and storm forecasts to inform local decisions.

Question 45. Please outline any potential effects of the local choice, English devolution and opportunities for flood risk management work on groups with a protected characteristic. Page 63

- 16.1 Local funding, particularly if it is channelled through existing local authority knowledge areas, that are currently underfunded, could seek to assist disabled residents to deal with the harmful impacts on mental health, caused by damaging coastal erosion.

¹¹ <https://www.edp24.co.uk/news/24815560.hemsby-lifeboat-crew-fear-station-lost-soon/>

¹² <https://rmets.onlinelibrary.wiley.com/doi/epdf/10.1002/joc.70010>