

**A Response to Flood and Coastal Erosion Funding Reform Consultation by Department for
Environment, Food & Rural Affairs**

29/07/2025

Dr Sien Van Der Plank

Executive Summary:

In response to this call for evidence on Flood and coastal erosion funding reform by Department for Environment, Food & Rural Affairs (DEFRA) we provide evidence and policy recommendations in relation to the following questions (from the terms of reference): 7, 8, 9, 14, 15, 40, and 41.

Policy Recommendations:

- I recommend that the proposed new hybrid approach includes guidance on how non-infrastructure-based FCERM adaptations, including long-term involvement and engagement of exposed communities, are to be funded.
- I recommend that the proposed new hybrid approach should provide greater clarity on its how it affects the relationship between SMPs/strategies and funding, where currently SMPs and strategies are not assured of funding.
- Principle 3 of the proposed new hybrid approach does not clearly set out how proposed refurbishment projects will be assessed or how they will be aligned with strategic planning documents such as Shoreline Management Plans (SMPs) or broader strategies. I advise that greater clarity is provided on how funding decisions will be made for the refurbishment of flood defence assets located on coastlines designated for managed realignment in Epoch 2.

Response Author:

Dr Sien Van Der Plank- Senior Research Fellow in the in the School of Geography and Environmental Science at the University of Southampton. She is Champion of the Coastal Communities Special Interest Group of the Southampton Marine and Maritime Institute, and her research is focused on the qualitative analysis of community level experiences, responses and involvement in decision-making relating to coastal change, hazards and climate change adaptation.

RESPONSE:

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

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

Agree

8. Please explain your answer to Question 7.

The proposed new hybrid approach to funding addresses some of the observed shortcomings of the current Partnership Funding policy, by potentially increasing access to FCERM funding for (1) smaller, coastal and/or socially-economically deprived communities; (2) property level flood resilience measures; and, (3) natural and nature-based FCERM approaches.

(1) Smaller, coastal and/or deprived communities: The Partnership Funding policy does not account for the reduced spending capacity of economically struggling towns and households, nor for the reduced networks and social adaptation capacities of coastal communities. The lack of focus on smaller communities was compounded by the *National Flood Resilience Review* of 2016, which included a priority to raise defence standards of “core cities” to the level of protection of London with no comparable targets for rural, vulnerable or deprived areas (Van der Plank et al., 2021, <https://doi.org/10.1016/j.ijdr.2020.101961>). The Partnership Funding policy effectively localises part of the funding responsibility and burden, and may be more readily accessed in less deprived areas where there is significant wealth or enterprise activity (Van der Plank et al., 2021; Van der Plank et al., 2022, <https://doi.org/10.3389/fmars.2022.954950>). The National Audit Office noted in 2020 that funding to deprived areas had reduced since 2014 (<https://www.nao.org.uk/wp-content/uploads/2020/11/Managing-flood-risk.pdf>). The proposed new hybrid approach is likely to improve access to FCERM funding for smaller, coastal, and deprived communities by fully covering the first £3 million of eligible projects.

(2) Property level flood resilience measures: the proposed new hybrid approach is likely to support household flood resilience by increasing access to physical flood risk mitigation at the property level. (Brown et al., 2023 <https://doi.org/10.3389/fmars.2023.1153134>).

(3) Natural and nature-based FCERM approaches: the proposed new hybrid approach and its increased recognition of the role for nature-based approaches is likely to increase the funding support for the four shoreline management policy options (HTL, ATL, MR and NAI), where fundability has previously been highlighted as uncertainty by FCERM actors (Brown et al., 2023 <https://doi.org/10.3389/fmars.2023.1153134>).

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

The proposed new hybrid approach does not address existing challenges of funding FCERM including (1) recognising and funding the long-term engagement of exposed communities in decision making,

especially in the context of adaptation to climate change driven changes to hazards; and, (2) establishing a more direct relationship between FCERM plans/strategies and funding thereof.

(1) Long-term engagement of exposed communities: climate change is redefining what effective FCERM looks like in a coastal context, requiring long-term planning and strategies to adapt. However, engaging and involving communities in decision-making that extends well beyond the immediate future is complex, especially so given the uncertainties of future change as well as of funding management/adaptations. The importance of ongoing, regular communication and engagement with communities is increasingly recognised and forms a key part of capacity building to climate change (Van der Plank 2024, <https://doi.org/10.1016/j.envsci.2024.103806>). I recommend that the proposed new hybrid approach includes guidance on how such roles (i.e. in local authorities or for other responsible bodies) and other non-infrastructure-based FCERM adaptations are to be funded.

(2) Establishing more direct strategy/plan and funding relationship: the proposed new hybrid approach may reduce the dominance of benefit-cost ratio driven decision making, that has been previously observed (i.e. that funding policy drives FCERM decision making) (Van der Plank et al., 2022). I recommend that the proposed new hybrid approach should provide greater clarity on its how it affects the relationship between SMPs/strategies and funding, where currently SMPs and strategies are not assured of funding, with implications including: continuation of a scheme-by-scheme approach to FCERM because of limited assurance of deliverability of larger (time/spatial) scale aspirations for coastlines; continuation of post-flood event FCERM decision-making not being made in keeping with longer-term strategic documents such as SMPs (Van der Plank et al., 2022).

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. 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).

Don't know.

15. Please explain your answer to Question 14.

Insufficient funding for the maintenance of existing assets is a recognised challenge within FCERM. However, Principle 3 does not clearly set out how proposed refurbishment projects will be assessed or how they will be aligned with strategic planning documents such as Shoreline Management Plans (SMPs) or broader strategies. Greater clarity is needed on how funding decisions will be made for the refurbishment of flood defence assets located on coastlines designated for managed realignment in Epoch 2.

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

40. What changes do you believe are needed to support and enable Regional Mayors to enhance partnership working with other organisations for flood risk management?

To support Regional Mayors in enhancing partnership working across organisation for FCERM, I advise that there needs to be increased specificity as to who is responsible for what and why – including funding, legal, state, citizen and personal responsibilities (van der Plank et al., 2022). Currently, there is limited specificity in FCERM policy regarding responsibility beyond legally mandated roles and requirements. This lacking clarity is creating a barrier to FCERM policy implementation, i.e. as documented by Kirby et al. (2021) regarding limited use of CCMAAs due to lack of legal responsibility for planners to use them in shoreline change planning.

41. How do you believe Regional Mayors can enable integrated approaches to strategic flood planning? What changes are needed to achieve this and how can risks be managed?

Regional Mayors present an opportunity to improve local stakeholder and community engagement in FCERM through: including (local) people at the centre of FCERM and adaptation processes; allowing for flexibility to innovate within FCERM for place-appropriate adaptations; supporting cross-sectoral and partner working in their region; and sharing evidence across partners for decision-making (van der Plank 2024).