

**STROUD DISTRICT COUNCIL**

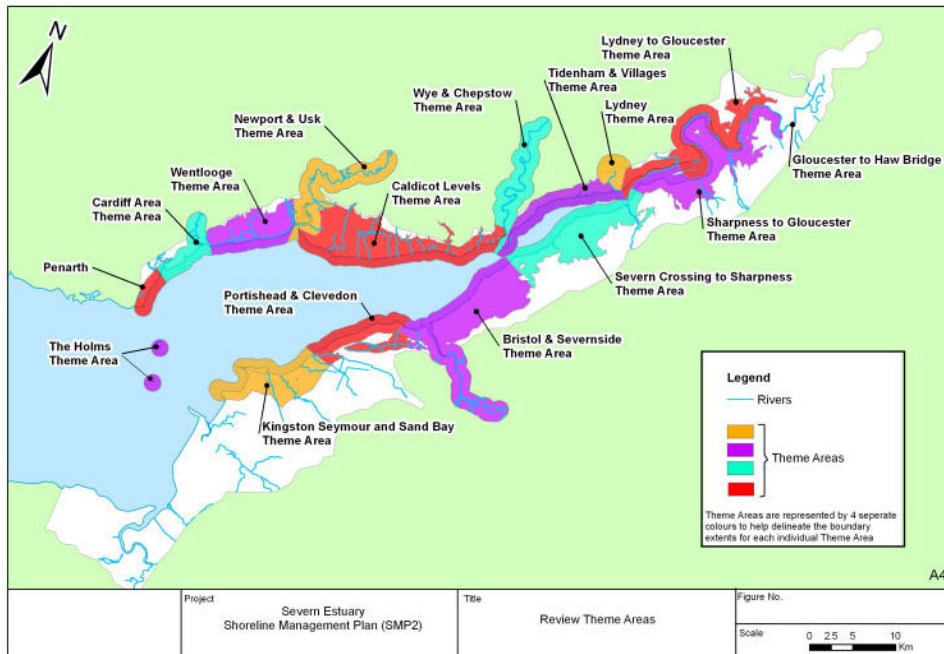
**CABINET MEMBER FOR DEVELOPMENT**

**18 December 2009**

<b>Report Title</b>	<b>Shoreline Management Plan</b>
<b>PSAP Date</b>	<b>18<sup>th</sup> December 2009</b>
<b>Purpose of Report</b>	To discuss and broadly agree the officer comments to the Shoreline Management Plan Preferred Policies to be made by 8 <sup>th</sup> January 2010.
<b>Decision(s)</b>	<b>The Cabinet Member for Development RESOLVES that:</b> a) the broad format and content of the comments upon the Shoreline Management Plan be approved. b) on behalf of PSAP any further amendments/changes to the comments upon the Shoreline Management Plan to be agreed.
<b>Consultation and feedback</b>	The Shoreline Management Plan is a non-statutory document, containing draft policies proposing how the shoreline around the Severn Estuary should be managed over the next <u>100 years</u> . The Severn Estuary Shoreline Management Plan Review (referred to as SMP2) is now subject to a 3-month public consultation period. This extends from Monday 5 October 2009 through to 10 January 2010.
<b>Financial Implications</b>	None directly Sandra Cowley, Head of Finance Tel: 01453 754136 Email: <a href="mailto:sandra.cowley@stroud.gov.uk">sandra.cowley@stroud.gov.uk</a>
<b>Legal Implications</b>	There is not a legal requirement to produce an SMP but Government in England and Wales believe they are important and useful documents for planners and flood and erosion risk managers. Patricia Audley, Head of Legal Services & Monitoring Officer Tel: 01453 754370 Email: <a href="mailto:patricia.audley@stroud.gov.uk">patricia.audley@stroud.gov.uk</a>
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<b>Portfolio Holder</b>	Cllr Mrs B Tait, Cabinet Member for Development Tel: 01452 812743 Email: <a href="mailto:cllr.Barbara.tait@stroud.gov.uk">cllr.Barbara.tait@stroud.gov.uk</a>
<b>Performance Management Follow Up</b>	Monitor how SCG action points raised. The Council will be asked to approve a version for submission in April 2010. This matter should be reported to PSAP and probably Cabinet.
<b>Background Papers</b>	<a href="http://www.severnestuary.net/secg/smp2partb.html">http://www.severnestuary.net/secg/smp2partb.html</a>  SMP2 Report - Part A – Signpost Report SMP2 Report - Part B - Policy Statements:

**Discussion**

1. People living along the coast of the Severn Estuary from Weston-super-Mare into Gloucestershire, and round to Penarth on the Welsh side, are being asked for their views on how their coastline should be managed over the next 100 years as part of a major new study called Shoreline Management Plan 2 (SMP2).
2. There is no legal requirement to produce a SMP but Government in England and Wales believe they are important and useful documents for planners and flood and erosion risk managers. It is important to avoid making decisions that would place additional responsibilities on future generations by unnecessarily increasing the number of areas at risk from coastal flooding and erosion, or not planning adequately to cope with coastal flooding and erosion in areas where traditional defences are not sustainable. The SMP2 should help planners and regulators to plan for and manage the way that the shoreline will change over time. This could be by maintaining or improving defences, by enabling the natural processes to play a greater role, creating new natural habitat or by helping areas that are at risk to cope with and limit the impact of coastal flooding and erosion.
3. The SMP2 provides certainty for landowners, residents and businesses on how the shoreline will be managed by regulators during the next 100 years, so that they can plan ahead and make decisions about investments, homes, development and the management of their resources. The SMP2 will support and influence a whole range of regional, national and international policies, frameworks and strategies, not just those connected with managing the shoreline. The SMP2 considers issues at a large geographic scale. The SMP2 only looks at the way coastal flooding and erosion is managed. It does not set policy for any other ways of managing flood risk (such as land drainage). It does not set out policy for managing the risk of flooding from other sources of flooding (such as from rivers, or urban surface water flooding). The SMP2 doesn't ignore these other forms of flooding or plans to manage other types of flood risk. It takes account of other flood risk management plans and policies (e.g. Catchment Flood Risk Management Plans (CFMPs)) to ensure that flood risk management plans cover all areas, whether riverbanks or shorelines.
4. The Severn Estuary Coastal Group is a partnership of the Environment Agency, conservation authorities, Internal Drainage Boards (IDBs) and various local authorities around the Severn Estuary. The study area of the SMP2 follows the shoreline from Lavernock Point, near Penarth in Wales to Anchor Head, just north of Weston Bay in England. The upstream boundary is at Haw Bridge, near Gloucester, which is just below the current tidal limit and still influenced by the sea. It also includes the islands of Flat Holm and Steep Holm. The shoreline has been divided into 17 **Theme Areas** based on regions, towns and cities around the Severn Estuary. Each Theme Area has been sub-divided into manageable lengths of coast, called Policy Units. There are 66 Policy Units covering the study area of this Severn Estuary SMP2.



5. The SMP2 has been developed taking account of predicted changes to sea level rise caused by climate change over the next 100 years. The SMP2 is therefore potentially seen as an important tool / guide for decision makers and planners to make sure that future land use on the shoreline does not put future generations at risk or impose unmanageable financial burdens in terms of coastal defence.
6. A draft policy option has been chosen for each Policy Unit and for each time period (epoch) covered by the SMP2 (0-20 years, 20-50 years and 50-100 years). There are four possible policy options available to choose from:
  - **Hold the Line (HTL)** – to provide some level of coastal defence and keeping the position of the defence approximately where it is now. This does not automatically mean that defences will be improved to counteract climate change – i.e.: how well the shore is protected from coastal flooding is not considered by the SMP2. This will be considered in more detail by Flood Risk Management Strategies and individual defence schemes.
  - **No Active Intervention (NAI)** – assumes that no maintenance, repair or replacement of existing defence structures takes place. It is a ‘do nothing’ scenario against which different policies can be tested but it is also a viable policy choice for some stretches of shoreline e.g. where there is a low risk of flooding or erosion now or in the future or where there is a gradual move towards realigning the shoreline (see below).
  - **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. This option may create additional habitat such as mud flats or saltmarsh, which provide a natural flood risk defence
  - **Advance the Line (ATL)** - means reclaiming land from the sea by building new defences further seaward. This has not been proposed as a preferred policy option anywhere in the Severn Estuary SMP2.
7. The **SECG** has followed the Stages set out in the Defra SMP Guidance Documents as summarised below:

• **Stage 1 – Scope the SMP2** – this is a key stage that sets important parameters for the SMP2, including defining the area of the SMP2, together with the inland and upstream extents. It also involves identifying important stakeholders, making them aware of the SMP2 process and setting up the communication methods for the development process.

• **Stage 2 – Assessments to Support Policy Development** – most of the technical analysis, mapping and risk assessment is undertaken in this stage. It includes developing an understanding of the physical processes affecting the shoreline, mapping what would happen if defences were not maintained and determining what would happen if current SMP1 policies were continued. Important features, issues and the benefits that people get from the features are also identified;

• **Stage 3 – Policy Development** – this stage brings together the analysis, modelling and mapping undertaken in Stage 2, with comments and information received from stakeholders, to identify what would happen under each of the four policy options available to determine which one is the most appropriate choice for each stretch of shoreline (Policy Unit). The way that adjacent Policy Units interact is also considered, as this can affect the decisions made e.g. whether a particular policy option has a negative impact on an adjacent stretch of shoreline. The end of this stage produces the draft SMP2;

• **Stage 4 – Public Examination** – a full 12-week public consultation on the draft SMP2 and the proposed policies for each stretch of shoreline (Policy Unit). All technical documents are made available. All four groups of stakeholders are involved in this stage. *The SMP2 development is currently in this stage*;

• **Stage 5 – Finalise the SMP2** – the results of the public consultation are used to make any amendments to the draft SMP2 and to produce the final SMP2. An Action Plan is also produced. This sets out the actions that need to be taken over the next 5 – 10 years to start implementing the SMP2 policies and who should be responsible for those actions. *Initial discussion has started*.

• **Stage 6 – Publish and make available the final SMP2** – The final agreed SMP2 and Action Plan are published and made available. Each organisation on the SECG has a copy and electronic versions are made available online.

8. Since September 2009 Members and Officers of Stroud District Council have considered the implications for this District. This report sets out our proposed response. The changes are given in Appendix 1. This follows dialogue with Atkins and analysis of their recommendations and proposed changes (since the first SMP in 2000). The discussions with Atkins were made on the basis that any comments we make on the proposed future action plan does not imply our consent to the SMP2 consultation recommendations. Notes of these discussions are given in Appendix 2. Climate change is now a significant challenge that has particular focus at the coast. Whilst unable to address mitigation of causes of climate change the SMP2 can help to contribute to ‘adaptation’ actions by considering what the future risks of flooding and erosion might be, taking account of climate change predictions, and identifying areas at risk e.g. due to rises in sea level. These findings are welcomed but the in-combination effects of sea level rise, high river flows and/or high sea surges have not been modeled. Recent flood events have occurred at Longney as a result of a combination event. Allowances are made in Annex B of PPS 25 but these considerations have not been adequately demonstrated or modeled in the SMP it is believed. The effects though may have significant impacts upon this District. Crop types and methods of cultivation may change in these rural areas and the agricultural value of this best and most versatile land may decline. Rivers and other watercourses that discharge into the River Severn may be impacted as water is held back for longer time periods until it is

able to discharge into the estuary effectively. This may alter the probability of flood risk in these areas.

9. PSAP Members are now asked to consider the suggested response to the SMP2 consultation and to support the approach taken. The approval of the Cabinet member for Development is sought to provide a mandate for the refinement of these concerns to be expressed.

- We welcome the 3 separate time epochs approach with longer time frame planning. This will assist longer term decision making, particularly with issues such as lifetime homes and location of housing in our Core Strategy work.
- The size of the document and use of technical language does not assist the reader. We welcome the on-line version but there is a lot of information to digest in assessing how it might impact someone or a specific place. It is quite intimidating. An executive summary or distillation of key facts could help.
- The changes in policy stance are not always easily determined from the evidence provided. We looked at a number of recommendations where the different topics such as biodiversity indicated a different action should be taken.
- In section 2 of the SMP2 further clarification is given on definitions. The policy definitions may be misinterpreted by the public. They lack clarity and appear to be contradictory:
  - HTL means keeping the line of the defence in its current location, however people will assume that this means no flooding. Especially as the text goes on to say the same Standard of Protection (SoP) as today will be applied. Unfortunately this definition then says in a second paragraph that HTL may not result in the defences increasing in size to take account of climate change and sea level rise impacts increase. This paragraph states the Standard of Protection (SoP) will gradually decrease over time. This generates a clear policy tension and lacks clarity for the reader. Any potential implications should be made clearer if SoP decreases over time. At the talk last week HTL could mean overtopping still occurs, what will the in-combination effects be of sea level rise and fluvial flooding? Will sea level rise 20cm over the first 20 years or is it slow increase which accelerates as time passes? People should be made aware that there are still flood risks with this policy. Will SoP remain as today or decrease?
  - NAI assumes no maintenance of repair of existing defences takes place. NAI states defences will not be allowed to fail in an uncontrolled or safe manner for health and safety grounds. It is unclear how this would be achieved with more recent extreme flood events, such as 2000 and 2007. There is no indication how close some defences are to their planned lifetime limit – how much sea level change is required before they could fail on a more regular basis? This option also raised a lot of questions. How would biodiversity interest be taken account of? Loss or decline of defence could also have implications for ground nesting birds on farmland and other existing flora and fauna.
  - MR involves landward movement of defences. This is recognised as having a biodiversity value and is seen as an opportunity. All this is left to further analysis and the SEFRMS work. The NAI could equally be seen as a wildlife opportunity in the absence of supporting detailed data to say would be lost or what new would be created. Could loss in fact exceed benefit? A saline inundation could remove certain plant species for a considerable period of time. Marsh could be created, but does this exceed the value of loss of wildflower meadow and associated fauna? It is difficult to demonstrate comparative values and relative worths. When extent is not shown either, how are people's property taken into account? This seems to be a grey area. Furthermore on the recommendations section MR has cost implications as existing defences would have to be maintained whilst new defences would be put in place. Suggest positive approach to allay resident fears of HTL to MR, (rather than NAI).

- The Members are concerned that agriculture is no longer a key policy driver. It is difficult to equate recent press stories on need for greater food production in this country to serve our needs and others. Much of the better agricultural land quality exists within the Severn Vale. Surely on sustainability grounds and land being a limited natural resource suggests that it should be a key policy driver. Your statement “based on a lack of policy and guidance on how important agricultural land is in making decisions, this SMP does not consider it to be a key policy driver” seems to be questionable in this wider sustainability context. Britain faces a 'perfect storm' of water shortage and lack of food, says the government's chief scientist, and climate change and crop and animal diseases will add to future woes. In Britain, a global food shortage would drive up import costs and make food more expensive, just as the nation's farmers start to feel the impact of disrupted rainfall and rising temperatures. The reliable availability of food – once taken for granted – has become a major cause for alarm among politicians and scientists. Next month several of Britain's research councils, together with the Food Standards Agency, the Department for Environment, Food and Rural Affairs and the Department for International Development – will announce a taskforce that will channel the UK's efforts in feeding its own population and playing a full role in preventing starvation in other nations. The problem is summed up by Professor Janet Allen, director of research at the Biotechnology and Biological Sciences Research Council (BBSRC). "We will have to grow more food on less land using less water and less fertiliser while producing fewer greenhouse gas emissions,". Over the next 40 years Britain's population will rise from 60 to 75 million while the world's will leap from 6.8 to 9 billion. Feeding all these people will stretch human ingenuity to its limit. Crop yields will have to jump, a goal that will have to be achieved in the middle of global climatic disruption. At the same time, farmers will find many aids – in particular, chemical fertilisers – that they have come to rely on will no longer be available.

Without this consideration the policy recommendations are not based on a full and robust assessment. The study appears to duck the issue. Property, land use and human health are seen as key factors earlier in the documentation (based around urban centres). In our opinion loss of agricultural production on land will affect health, local economy (enterprises and employment), and land use. Farms need to be viable enterprises to manage land and employ people. They are a vital resource within a rural district such as ours. The rural economy also often supports the urban centres and this point appears to have been missed.

Agricultural land quality and soil quality do determine the flexibility of land-use in planning terms. PPS 7 states the presence of best and most versatile land should be taken into account alongside other sustainability considerations. The guidance in paragraph 28 goes on to state that where significant development of agricultural land is unavoidable, use of poorer areas should be used in preference to that of a higher quality. Indeed planning authorities have to decide whether this land can be lost, having carefully weighed the options in the light of full and competent advice. There is guidance and it should be a policy driver in our opinion. Excluding this factor is inconsistent with national planning statements. Have DEFRA considered the document and published their analysis of options as a competent body?

- Will farmers lose flat payments on the land with your policy recommendations such as managed realignment? There was no answer to this concern in the document and you may wish to consider this at the public events.

- The Members are concerned that the historic environment is no longer a key policy driver. There is also a tension between the clear statement “that the historic environment of the Severn Estuary is very important” and the next sentence that states “based on a lack of policy and guidance on how important historic environment is in making decisions, this SMP does not consider it to be a key policy driver” again seems to be questionable in the sustainability

context. The historic environment is also a limited natural resource key to sustainability considerations. We have internationally important sites such as Berkeley Castle and its surrounding estate/parklands. Yet the document seeks to protect biodiversity at the equivalent status.

- On agriculture and historic environment points I must draw your attention to PPS1 that sets out national key objectives and principles for the planning system. This states "A high level of protection should be given to most valued townscapes, landscapes, wildlife habitats and natural resources. Those with national and international designations should receive the highest level of protection." Paragraphs 19 & 20 sets out more detail on environmental issues and what planning decisions should be based on. Does the document reflect this national advice? The informal opinion of Members was that more work is required on these elements to truly reflect national environmental and sustainability considerations.
- 10. The proposal to "Hold The Line" is not sustainable in biodiversity terms in the longer term. Holding the line of flood defences with increasing sea level rise will impact the intertidal zone (strip between high and low tides). The estuary's classic funnel shape, unique in Britain, is a factor causing the Severn to have the second-largest tidal range in the world (after the Bay of Fundy, Canada). This tidal regime results in plant and animal communities typical of the extreme physical conditions of liquid mud and tide swept sand and rock. The species-poor invertebrate community includes high densities of ragworms, lugworms and other invertebrates forming an important food source for passage and wintering waders. A further consequence of the large tidal range is the extensive intertidal zone, one of the largest in the UK, comprising mudflats, sand banks, shingle, and rocky platforms. Glassworts and annual sea-blite colonise the open mud, with beds of all three species of eelgrass occurring on more sheltered mud and sandbanks. Grazed saltmarsh fringes the estuary with a range of saltmarsh types present. The conservation of the site features is dependent on the tidal regime. The range is the second highest in the world and the scouring of the seabed and strong tidal streams result in natural erosion of the habitats. The estuary is therefore vulnerable to large scale interference, including human actions. These key areas will be lost with an extensive hold the line strategy. This loss is not adequately considered within the documentation. The middle marsh areas and upper marsh areas could also be affected. The middle marsh sward is dominated by common saltmarsh-grass with typical associated species. In the upper marsh, red fescue and saltmarsh rush become more prominent. Hold the Line is assumed to have no significant impact and this is not the case in ecological terms.
- 11. Raised issue of hinterland ecology. A MR policy may benefit the designated sites in terms of wildfowl wetland habitat creation, however could be detrimental on some existing habitats / species on the hinterland. e.g. Protected species such as water vole habitat with diversity of freshwater reeds and rushes they feed on, and bats using tree/wooded areas containing oaks and beech would not be tolerant of saline inundation events. Suggest contact Gloucestershire Centre for Environmental Records for this information. We would like to see a robust study of hinterland ecological value and a greater analysis of wildlife gains and losses as we agreed at the last meeting with Atkins. PPS9 important with both protection and enhancement considerations. Questioned how RIGS and Geological interest taken account of in recommendations.
- 12. Concern at tidal locking with a number of rivers in the Vale - such as the Ewelme at Cam. This could impact future development options here. Significant SuDS and flood defence measures required on a recent application owing to back-up/flood risk issues. The Council want to ensure that an agreed action at a previous meeting to consider how the tidal locking and fluvial flooding, and outlets, are affected by all the different management recommendations is actioned. The study recommendations cannot be considered robust without this work. SEV1

already has issues with fluvial backing up and flood risk. There is a need for localised flood risk investigation to obtain further information such as where the Little Avon confluence at Berkeley Pill. SHAR8 also has a potential issue with future use of canal banks as flood defence. Canal is a flood relief channel itself and no information on level of freeboard within canal. There is a need to monitor canal bank stability and capacity/appropriateness as a flood defence structure and to consult with British Waterways on this infrastructure.

13. SHAR8 recommendations have implications for any Sharpness development. The Core Strategy may look towards employment here associated with inshore freight in the future for example. The current Adopted SDLP and Waste Local Plan have a number of employment (4) and recycling allocations (2) outstanding. Whilst the area is HTL a breach or overtopping event up or downstream may impact access to the Sharpness docks and infrastructure supporting the area such as Purton Water Works. These factors need to be considered.
14. An urgent update of defence data is required. The data used in the SMP2 is over twenty years old and with recent events in 2002 and 2007, there could be significant margins of error that could undermine robustness of recommendations. The change in weather patterns and extreme events over the last ten years indicates significant change is already occurring. There should be a key action to update NFCDD data following asset surveys and re-consider the recommendations.
15. Finally the Council is concerned with the potential and significant resourcing issues for the implementation of any recommendations/ actions arising from the SMP2 and the later action plans. With climate change, there is unlikely development to support and fund flood defences. Actions must consider future source and timing of funding streams to implement the Plan. This will be a significant financial issue. The Water Bill is intended to pass through Parliament before the next election it was announced on Radio 4 today. The Environment Agency will have a key role in creating an overall strategy for flood defence and overseeing works but local authorities will be given a much greater role in implementation of these strategies. This may have significant implications for this District. The issue of the SMP2 recommendations and their implementation is not adequately dealt with. Floods and Water Bill transferring powers to councils to manage the risk raises a concern that they won't necessarily agree. Who will arbitrate on strategy management differences between different areas such as between Gloucester and Stroud, South Gloucestershire and Stroud for example? Significant damage could occur if one party does not adequately maintain the defences as flood waters do not recognise administrative boundaries. This needs to be considered.

**Approved by Cllr Barbara Tait; Cabinet Member for Development**

**Signed:**

**Date:**

**Appendix One**

Theme Area	Policy Unit	Existing SMP Policy	Preferred Policy		
			0-20	20-50	50-100
Maismore to Sharpness	SHA1	HTL	NAI	MR	MR
	SHA2	HTL	NAI	MR	MR
	SHA3	HTL	HTL	HTL	HTL
	SHA4	HTL	NAI	MR	MR
	SHA5	Do nothing	NAI	NAI	NAI
	SHA6	HTL	HTL	HTL	HTL
	SHA7	HTL (or retreat)	NAI	MR	MR
	SHA8	NAI	NAI	NAI	NAI
Sharpness Downstream	SEV1	HTL	HTL	HTL	HTL
	SEV2	HTL	HTL	HTL	HTL

Appendix Two

Record of meeting with Atkins at Stroud Council 28/10/2009

Attendees:

Colin Whittingham	Atkins	Stacey Beddows	Atkins
Conrad Moore	Stroud Council	Ian Kear	Stroud Council
Cllr Graham Littleton	Stroud Council		

**Apologies:** Pete Gilbert Stroud Council

The purpose of this meeting was to open discussion with the relevant Local Authorities on possible actions to implement and deliver the policies as set out in the SMP2. The following is a note of this meeting and does not formally represent any actions to be included in the final SMP2 action plan.

	Comments / Proposed Action	Action
CW	Introduced purpose of the meeting. The purpose of these meetings is to allow an action plan to be developed, not only for delivery of the policy but overall delivery of the SMP2. It was intended as a sustainable management tool.	
GL	Here to raise IDB concerns as well as his residents concerns. Clarified that hold the line option did not prevent overtopping or breeches. Agreed as the standard of protection would be declining with time even in this option.	
CM	Pointed out our earlier concerns sent to them on 30.09.09 which included agriculture, ecology, sustainability and historic environment concerns, amongst other matters.	
CM	Issues with the definitions and the preferred policies, Raised concern over NAI followed by MR. In the event of a breach in the near future would NAI omit additional works to be carried out to repair the breach?	
CW	Combination of fluvial and tidal flooding. Halcrow SFRA broad brush, mainly considered fluvial and not a combination event. No model existed for in-combination effects.  SMP has attempted to take account of CFMP recommendations. <b>Action: further investigation into in-combination events.</b>	
GL	Recent flood events have occurred at Longney as a result of a combination event.	
GL	Saline intrusion renders agricultural land unusable for food production for 6 to 8 years. Recent Government guidance is seeking to promote future food security	

Cabinet Member for Development  
16 December 2009

ALL	<p>issues and reducing carbon footprint.</p> <p>Brief discussion on compensation responsibilities arising from the recommendations. EA have responsibility on MR only and NAI would mean EA pay no compensation to landowners. NAI should be covered by insurance?</p>	
CM	<p>Raised issue of hinterland ecology. A MR policy may benefit the designated sites in terms of wildfowl wetland habitat creation, however could be detrimental on some existing habitats / species on the hinterland.</p> <p>e.g. Protected species such as water vole habitat with diversity of freshwater reeds and rushes they feed on, and bats using tree/wooded areas containing oaks and beech would not be tolerant of saline inundation events.</p> <p>Suggest contact Gloucestershire Centre for Environmental Records for this information.</p> <p><b>Action: study hinterland ecological value and do a more robust analysis of wildlife gains and losses.</b></p> <p>PPS9 important with both protection and enhancement considerations. Questioned how RIGS and Geological interest taken account of in recommendations.</p>	
SB CM GL	<p>SHAR3. HTL to prevent Arlingham bend being cut off. EA previously proposed using the area as a flood relief channel. Questioned the EA recommendations in the future.</p> <p>Currently utilises a pumped system to relieve flood risk during tide locking. Recent IDB works has increased volume of ditches but still a concern with effects of in-combination events. Tide locks have a real impact, especially as rain on Minchinhampton reaches Ebley gauging weir in 45 minutes. Little reaction time to fit with tides.</p>	
CW CM	<p>Defence data. Urgent short term update of defence data.</p> <p>The data is over twenty years old and with recent events in 2002 and 2007, there could be significant margins of error that could undermine robustness of recommendations.</p> <p><b>Action: Update NFCDD data following asset surveys</b></p>	
IK, GL CM	<p>Issues currently with the River Frome at Saul were identified in terms of tidal locking.</p> <p>Concern at tidal locking with a number of rivers in the Vale - such as the Ewelme at Cam. This could impact future development options here. Significant SuDS and flood defence measures required on a recent application owing to back-up/flood risk issues.</p>	

	<b>Action: to consider how the tidal locking and fluvial flooding, and outlets, are affected by all the different management recommendations.</b>	
CM	<p>SHAR8. Potential issue with future use of canal banks as flood defence. Canal is a flood relief channel itself and no information on level of freeboard within canal.</p> <p><b>Action: monitor canal bank stability and capacity/appropriateness as a flood defence structure. Consult with British Waterways on this infrastructure.</b></p> <p>SHAR8. Sharpness development. The Core Strategy may look towards employment here associated with inshore freight in the future for example. The current Adopted SDLP and Waste Local Plan have a number of employment (4) and recycling allocations (2) outstanding. Whilst the area is HTL a breach or overtopping event up or downstream may impact access to the Sharpness docks and infrastructure supporting the area such as Purton Water Works.</p>	
SB	SEV1. Issues with fluvial backing up and flood risk. <b>Action: Localised flood risk investigation to obtain further information.</b>	
GL	Little Avon, meeting with Berkeley Pill.	
CM	Core strategy to be published early in new year. Potential new proposals for Sharpness and Berkeley in one option with towns supporting rural hinterlands and other options with development dispersal approach. The strategy may favour the development of an underused railway and docks?	
GL	Raised Importance of canal within the area as a flood defence structure (surface and fluvial)	
CM	Concern that costs associated with HTL may lead to crisis management or in practice NAI. Concern that one district approach may differ from ours and in south of District in particular flooding will affect a substantial hinterland and adjoining areas.	
CW	More partnership with other councils (adjoining areas of flood / erosion risk).	
CM	Floods and Water Bill transferring powers to councils to manage the risk, concern that they won't necessarily agree. Who will arbitrate on strategy management differences? MR had cost implications as existing defences would have to be maintained whilst new defences would be put in place. Suggest positive approach to allay resident fears of HTL to MR, (rather than NAI).	
SB	Agricultural land re classification.	
CM	Agricultural land classification would be welcomed in the initial assessment and should consider latest thinking	

	that agricultural land value is to increase overtime with population demands and seeking more locally sourced agricultural produce. Land is a finite resource and key to sustainability considerations. Land quality indicates flexibility of food production. Higher land quality is within the Vale and yet these considerations are not built adequately into the recommendations.	
CM	Resourcing issues for the implementation of any recommendations/ Actions. With climate change, unlikely development to support and fund flood defences. Actions must consider future source and timing of funding streams to implement the Plan. This will be a significant issue. May be “chicken or egg” scenario but must be thought about to deliver realistic actions.	
CW CM	Introduced CAPE – local people to get together – mitigation measures – resilience measures. This may work where there is a town or concentration of population, but in the estuary coastal areas in our District it is a rural based economy which is already stressed by low incomes and loss of services. A Parish precept idea suggested would not help with costs and low population.	
CM	Brief discussion on importance of Berkeley as tourism hub. Loss of access, events in historic park affected or just fear of flood could have adverse economic effects on tourism in District. This needed to be considered as historic environment is key part to any sustainability assessment.	
CW	Requested potential Committee dates ideally between April and June for final report sign off.	