Welsh Coastal Groups Forum



# Shoreline Management Plans

## Guidance to major policy change process in Wales

April 2023

# Foreword

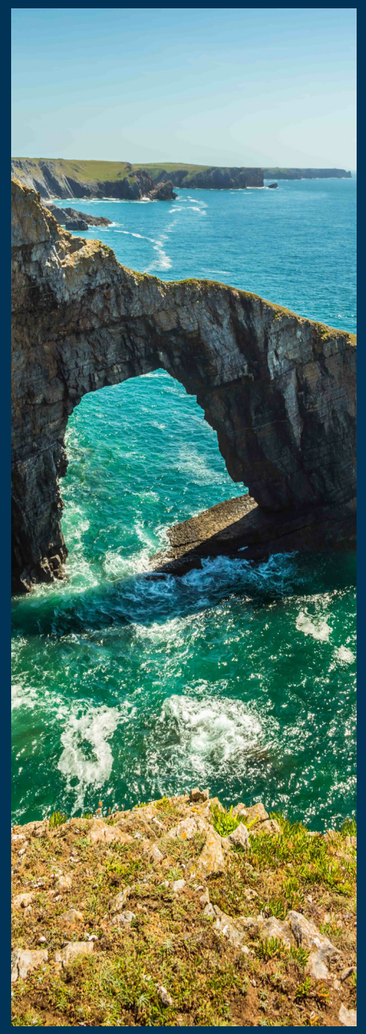
Shoreline Management Plans 2 (SMP2s) are non-statutory documents, providing a high-level assessment of the risks associated with coastal processes, and present a consistent policy framework to reduce these risks to people, communities, and historic and natural environments in a sustainable manner. SMP2s span over a hundred-year timeframe with preferred policies identified across 3 epochs, setting out objectives of intent.

SMP2s are recognised as the foundation for shoreline management planning. They have been developed using information and consideration given by professional partners using best available evidence as well as local management policies and opportunities. They have been subject to peer review by stakeholders and a Quality Review Group before being adopted by local authorities to inform decision making. A national SMP2s Refresh Project took place in 2020 to ensure the documents and Supplementary Guidance are up to date and fit to be used as material for consideration both locally and regionally.

The Welsh Coastal Groups' Forum (WCGF) recognises that uncertainty over the longer term is unavoidable and therefore policies may be challenged if new evidence emerges providing justification for a major policy change review. There is a need for the WCGF to ensure that any process for reviewing, challenging, and changing policies is robust, consistent, and transparent, especially for a major policy change. This guidance document which has been approved by members of the WCGF sets-out this process.

WG Grant in Aid Funding and Regulatory decisions are informed by SMP Policy and could be difficult to secure if management action is proposed that is not in line with policy. Therefore, this Major Policy Change Guidance provides a robust mechanism to consider whether a policy change can be justified, which in turn may support funding or regulatory decisions if the policy change is agreed.

Finally, the WCGF acknowledges the nature of potential changes and the difficulty of developing and applying a one size fits all process. We have therefore committed to review and update this process regularly as new cases are brought to us for recommendation.





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# I. Introduction

The second generation of Shoreline Management Plans (SMP2s) became live documents at the end of 2014. They provide a large-scale assessment of the risks associated with coastal processes and present a policy framework to reduce these risks to people and the developed, historic, and natural environment in a sustainable manner. They have been developed with a view to moving us forward to a more sustainable position of management beyond the 100 years' timeframe.

SMP2s and preferred policies have been developed following an evaluation of all four SMP2s policy options, informed by the best information available at the time. SMP2s are invaluable tools which support decision making linked with strategic planning, coastal management policies and have been subject to peer review by consultants, coastal group members and an SMP2 review panel. They help support sustainable decisions for now and the future considering increasing risks linked with climate change.

Whilst uncertainty over the longer term is inherent, the SMP2s help to communicate the direction of trends based on evaluation of current and future risk, although the timing of change can't be precise. There is therefore an understanding that SMP2s epochs are not absolute, and timing and preferred policies should not be set in stone, instead setting the direction of travel and the broader intent of management knowing that, as new evidence emerges, challenges to these policies, with a view to changing the policy, could arise.

The SMP Refresh Project highlighted some of the challenges linked with static epochs and the complexity of applying a preferred policy to the full length of a policy unit where differing priorities and ownership may complicate a seamless implementation.

To ensure this process is transparent and consistent as well as being informed by sound evidence, the Welsh Coastal Groups' Forum which oversees and record major policy change across Wales, has agreed a 5 stage process which should be followed by all organisations wishing to trigger a major policy change review.

**The Welsh Coastal Groups' Forum (WCGF) defines major policy change as follow (see appendix 1 for the full hierarchy of policy change):**

**Changes to a policy or epoch in which a policy is to be implemented, or changes to the action plan that are likely to result in this.**





# II. Who can challenge a Policy?

A number of different stakeholders have an interest in management of the Welsh coastline, for example, Local Authorities, Natural Resources Wales (NRW), private landowners, Network Rail, communities, and individuals. It is anticipated that any of these stakeholders may request a major change to a SMP2 policy or Action Plan.

However, due to the nature of SMP2s and implications of a major policy change, only Coastal Groups' members are able to request a policy review. Non-members, including landowners, communities or individuals would require the support of a Change Sponsor. Support must only be approved once a Change Sponsor is satisfied that there is a case for it. It is suggested for early discussion to take place with the Coastal Group Chair (Figure 1).

This early appraisal will ensure that any major policy change request is driven by sound evidence and not through preference.



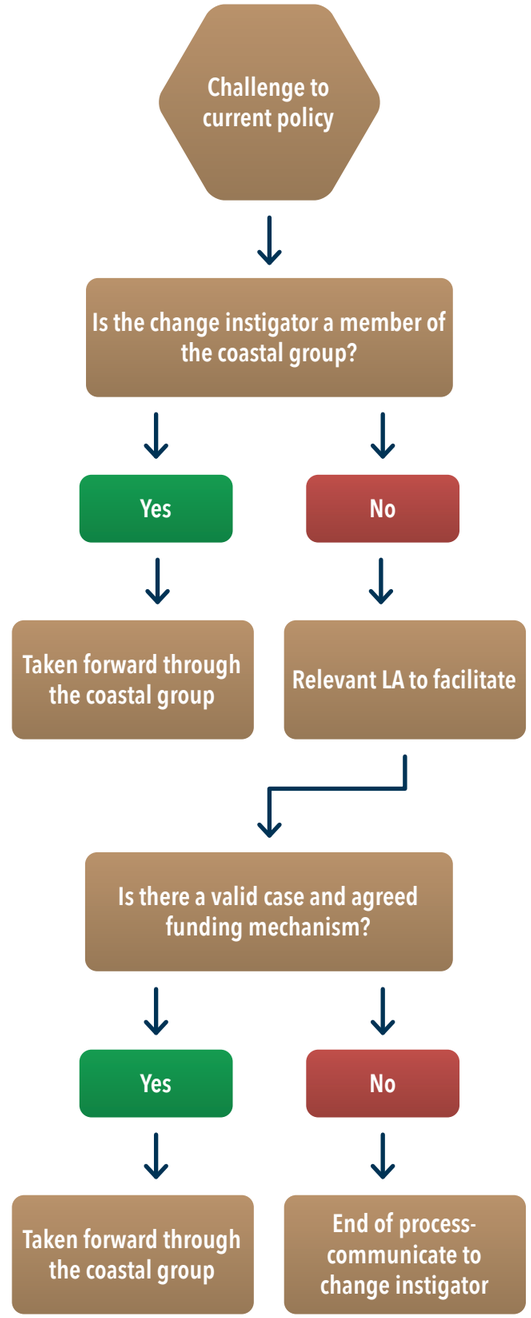



Figure 1 - Flow Chart to Challenge a Policy

# III. Roles of contributing organisations

This section sets-out the role of key individuals and organisations who may be involved in the process of a major policy change. Terminology used throughout this guidance and other related documents will be consistent with table 1.

Table 1: Stakeholders role.

| | |
|---|---|
| **Change Instigator** | An individual or organisation who wants to raise a challenge. |
| **Change Sponsor** | Needed in the case where a challenge is raised by an organisation who is not a coastal group member to bring the challenge to the coastal group. The best placed organisation (which can be agreed at CG level) will fulfil this role. |
| **Coastal Group Lead** | The nominated lead for coordinating the function of the Change Managers to process a policy change request would be the Coastal Group Chair. If an application for policy change is within the Chair's own Local Authority administrative area, responsibility is either passed on to the Vice Chair to chair or the Vice Chair signs off the Chair continuing. The Chair will be responsible for ensuring adequate stakeholder engagement is carried out by the lead organisation or change sponsor as appropriate. |
| **Change Managers** | A subset of the Coastal Group, including relevant Local Authorities (the Local Authority covering the location of the policy challenge and neighbouring Local Authorities to the policy challenge location); Natural Resources Wales (representatives of operational and strategic interests and as a SNCB advisor); Heritage representation (e.g. CADW / relevant Wales Archaeological Trust) dependent on environmental screening outcome. Any other members deemed appropriate by the Coastal Group.<br><br>Change Managers will review the business case proposed for a major change and provide a view on whether a recommendation for further consideration can be determined. |
| **Coastal Group** | Consider the change on a regional basis and, consistency with other major change challenge evidence submitted |
| **Welsh Coastal Groups' Forum** | Considers a case at an all Wales level, ensuring consistency with other major change challenges and evidence submitted. The WCGF will write to Welsh Ministers to confirm the case has followed due process considering all economic, social, and environmental impacts of the proposed change in policy. In doing so, the WCGF will also provide a recommendation to WG's Officials. |
| **Welsh Ministers**<br>**Welsh Government** | Will consider the evidence and recommendation of the WCGF, and if content, will write to CG Chair to confirm WG is content due process has been followed. Welsh Ministers will also be responsible for reviewing and signing off the Statement of Case (incorporating IROPI) where necessary |



# IV. Major Policy Change Process

Improved understanding of coastal processes, more accurate dataset, and the transition towards epoch 2 are likely to lead to an increase of requests for policy reviews. Whilst it is accepted that reasons for triggering a major policy review will vary on a case-by-case basis, the recommended steps to ensure due process is followed should remain the same for all cases. The WCGF has therefore agreed a 5-stage process, simplified in Figure 2 below.

We have already seen a handful of challenges to SMP policies by business owners and communities across Wales. As such, it is important for any challenge requesting a major policy change to follow a thorough, traceable process to limit risks of judicial review or other legal challenges. The evidence gathered through this exercise will ensure that any decision made by a Coastal Group or indeed a Change Sponsor is informed and sound.

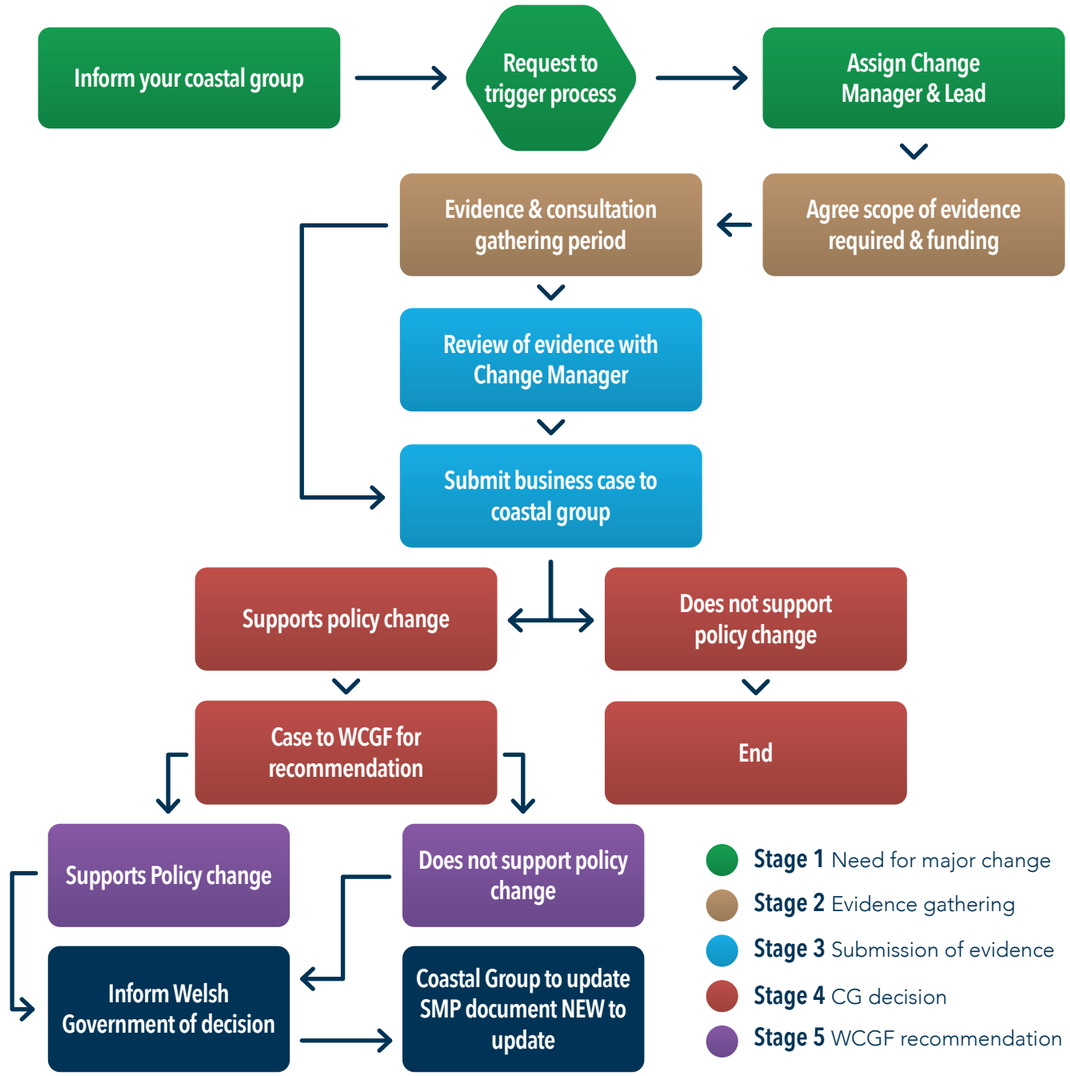



Figure 2 - 5 stage process for major policy review

# Stage 1: Triggering Major Change

### When should a Major Policy review apply?

WCGF recognises that uncertainty over the longer term is unavoidable, and therefore, policies may have to be reviewed if new evidence emerges that justifies a major policy change proposal.

The challenges associated with using static epochs and the complexity of applying a preferred policy unit over one stretch of coast where differing priorities and ownership apply has been highlighted by the SMP Refresh Project. These challenges may complicate a seamless policy implementation within any one policy unit, as a result, an individual or organisation may wish to split the policy unit accordingly, triggering a Major Change. As a result, the review process as seen in Figure 2 will be instigated.

There may be a need to review policy for the following reasons:

- Existing policy is conditional on other influences, which have now been resolved.
- There has been a change in coastal behaviour or understanding of coastal behaviour from that assumed by the SMP, expected to affect how the coast will change in the long term.
- Strategies and schemes highlight new evidence that challenges the SMP policy.
- There has been a significant change in assets at risk from coastal erosion or flooding. This may be due to an extreme weather event or as a result of change in land use since the SMP.
- Changes in designated sites, including evidence on site condition or impacts, means policy implementation is unlikely to be environmentally acceptable or legal.
- There are significant changes in government policy, such as funding, spatial planning, funding for coastal adaptation plans, and environmental targets, that mean the policy has become either untenable or less attractive than alternative approaches.
- There are significant changes in climate and sea level beyond those anticipated by the SMP.
- Actual management is not in line with SMP policy (for example, HTL rather the MR) and is therefore potentially inappropriate or in conflict with the SMP intent.
- Management is in accordance with policy, but the implementation method is different from the approach identifies in the SMP, and this is expected to affect the long-term target outcome for other policy units (such as by disrupting sediment movement).

### How to request a policy review?

Any challenge to a policy will have to be raised with the relevant Coastal Group by completing form **MPC/2022/record**. You should request this form from your Coastal Group Chair if you do not have a copy.

This form will ensure that an initial high level assessment has taken place justifying the validity of a policy review. Please note, this form is not the case for change and a thorough business case will still need to be produced by the Change Instigator or Sponsor.

### Who should lead on the process?

Building a case for a major policy change will require a range of stakeholders' involvement throughout the process. The Change Instigator or Change Sponsor will have a leading role in building the case, from gathering the evidence to submitting the final case to the Coastal Group for decision.

Communication throughout this process will be important, and the Change Instigator or Change Sponsor will have to nominate a lead officer which will be the main liaison with the Coastal Group and Change Manager. We would recommend the Coastal Group Rep from the relevant organisation to play this role.

The Chair of the relevant Coastal Group should have an overseeing role, not a leading role. The Chair is here to ensure a good flow of information, that progress is made, but mostly to ensure due process in line with this guidance is followed.

For transparency, if the challenge comes from the organisation for which the Chair works, the Vice Chair of the Coastal Group will become the Nominated Lead.

### Who should cover costs associated with the case?

It has been agreed that the Coastal Group is not responsible for building the case on behalf of the Change Instigator. Likewise, any costs associated with building a case for a policy review will rest with the Change Instigator. Coastal Groups' funds cannot be used for this purpose unless previously agreed by all paying members. Change Sponsors should also ensure that whoever they are supporting has the means to cover all costs associated with the process.

It is also worth noting that the costs associated with building a case for major change may not be eligible under the Welsh Government's Grant in Aid. We strongly recommend engaging in early discussion with the WG Flood Branch to check for eligibility if seeking funding.



# Stage 2: Agree scope of evidence- A strong case for change

## A major policy change cannot be driven by local interests or preferences

Consideration of a proposal for major change to an SMP requires a range of evidence to be gathered to inform decision and ensure any potential change is economically sound, socially acceptable, and is not likely to have adverse impacts on the environment. SMPs present a policy framework to sustainably manage the developed, historic, and natural environment alongside mitigating the risk of maritime communities. As a result, evidence gathering is a crucial stage of the process important and should be fully considered to enable decision making on whether a major policy change can take place or not.

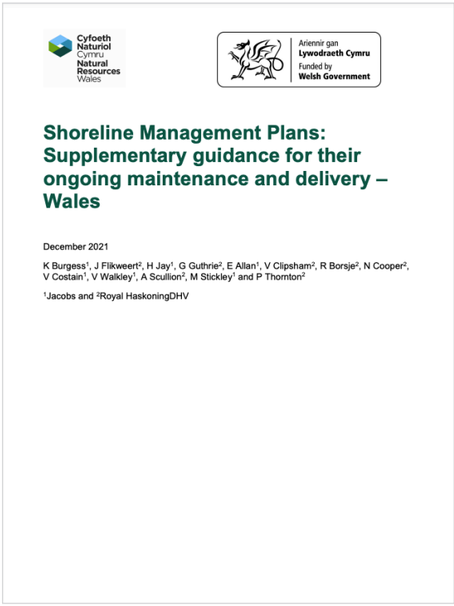
It is important that any potential environmental, social, and economic impacts of a major change is evaluated in a comparable and consistent manner. Therefore, for consistency with SMP2s appraisal, the review process set out within NRW's SMP: Supplementary Guidance document[1] alongside DEFRA's SMP Guidance should be used for this impact assessment.[2 3] The level of input should be proportionate to the issue being addressed, with NRW recommending a phased approach be utilised, for example, one involving an initial scoping stage to review the evidence produced for SMP2. The rationale for a phased approach is that further assessments, such as requirements for an amended SEA or a new Habitats Regulations Assessment (HRA), may depend on whether a policy change is concluded as the preferred approach.

The guidance below provides examples for where evidence gathering may be appropriate, as recommended within the NRWs SMP: Supplementary Guidance Document and is split into the following categories: Understanding of coastal behaviour and dynamics, development and technical assessment of alternative options, development and technical assessment of alternative options, environmental assessment and the validation of policy based on funding risk.

### Understanding of coastal behaviour and dynamics

Depending on the nature of the major policy change, it is likely that some further appraisal of coastal behaviour and dynamics is appropriate. NRW states that at the simplest level, the appraisal should confirm whether there have been significant changes since SMP2 or whether they have remained the same. It is recommended that the change instigator contacts the WCMC and NRW early in this process.

If evidence suggests there have been significant changes since SMP2, further data collection and analysis may be required to support the policy appraisal. If required, these studies could be commissions ahead of the SMP policy review.


Cyfoeth Naturiol Cymru Natural Resources Wales

Ariennir gan Lywodraeth Cymru Funded by Welsh Government

**Shoreline Management Plans: Supplementary guidance for their ongoing maintenance and delivery – Wales**

December 2021

K Burgess[1], J Flikweert[2], H Jay[1], G Guthrie[2], E Allan[1], V Clipsham[2], R Borsje[2], N Cooper[2], V Costain[1], V Walkley[1], A Scullion[2], M Stickley[1] and P Thornton[2]

[1]Jacobs and [2]Royal HaskoningDHV

[1]Natural Resources Wales. December 2021. Shoreline Management Plans: Supplementary guidance for their ongoing maintenance and delivery – Wales. Available from: https://cdn.cyfoethnaturiol.cymru/media/694585/shoreline-management-plans-supplementary-guidance-for-their-ongoing-maintenance-and-delivery-in-wales.pdf

[2]Department for Environment Food and Rural Affairs. March 2006. Shoreline management plan guidance, Volume 1: Aims and requirements. Available from: https://www.gov.uk/government/publications/shoreline-management-plans-guidance

[3]Department for Environment Food and Rural Affairs. March 2006. Shoreline management plan guidance, Volume 2: Procedures. Available from: https://www.gov.uk/government/publications/shoreline-management-plans-guidance

### Development and technical assessment of alternative options

When considering changes to policy categorisation, it is important that viable approaches to delivering a desired change are identified. Having defined possible appropriate policies for future shoreline management, it is then necessary to appraise how the coast will evolve under the new policy category and the implications of this for important features along the shoreline. At the simplest level, the impact of the proposed policy change should be tested for all relevant epochs or trigger thresholds. This is especially important when considering major change proposals as new policies may impact the original strategic objectives for the area in question. As in line with NRWs SMP: Supplementary Guidance, it is recommended that the triggers for, and expected timing of, any policy transition must also be considered.

The technical viability of any proposed policy changes to policy category should be considered in terms of the potential engineering issues with the suggested implementation approach and any potential consequences on shoreline dynamics. Consideration should be given to adjacent policy units. Especially where changes may impact on the sediment regime along the coast or on the erosion and flood risk in the surrounding areas.

Finally, it is important to consider the potential implications and uncertainties as a result of climate change and accelerated sea level rise on the long-term implications, sustainability and viability of the proposed option.

For further information please refer to the following sections within NRWs SMP: Supplementary guidance:

- Section 5: defining alternative policy options.
- Section 7: latest climate change projections and and how these should be considered by SMPs – options also need to be compatible with the Local Planning Authority Ambitions for future land use and its Local Plan policies, considering timescales. Close engagement with Local Planning Officers is highly recommended.
- Section 9: provides information on maintaining and strengthening links with the planning system.

**Note:** This task may already have been undertaken as part of a strategy or scheme that instigated the policy review.

### Environmental Assessment

Assessing the impacts on a range of environmental receptors should be a key consideration when proposing a major policy change. Early communication with NRW is highly recommended to determine the best approach to environmental assessments. It is very important that the environmental assessment remains focussed and proportionate, with reporting at an equivalent level to the existing SMP SEA.

There is no legal requirement to undertake SEA for SMPs as they are not deemed to be required by legislation, regulation, or administrative provision. However, SMPs do set a framework for future planning decisions and, therefore, have the potential to result in significant environmental effects. Further, Defra guidance (Defra, September 2004) is that SEA is applied to SMPs, and this is Environment Agency policy.

Depending on changes that have occurred since SMP2, the need for new baseline data may be required, this review should take place early in the scoping stage with any relevant stakeholders contacted as needed. However, evidence gathering may prove that the existing SEA may still be suitable in developing the scope of an environmental assessment and in identifying the SEA objectives.

To ensure a consistent approach is taken across all policy units within relevant SMPS, the assessment methodology presented in the existing SEA for the four SMPs in Wales should be used. This allows direct comparison to be made with other areas within the SMP which will benefit the decision making process.

SEA assessment methodology:

1. Screening and Scoping
   - Determines if there is need for SEA.
   - Problem identification and key alternatives.
2. Establish SEA Objectives
   - Identification of key environmental features or assets along the coastline.
3. Environmental Baseline
   - Baseline data to be collected to provide a baseline against which the significant environmental effects of the policy change could be measured and assessed.
4. Assessment Methodology
   - Process of assessment involves the identification of potential environmental effects.



5. Consultation
   - Must remain central to the development of a SEA to arrive at a SMP policy change that is acceptable to as many stakeholders as possible and to engage those stakeholders in the process.

     (See section on stakeholder engagement).
6. Reporting
   - Results of the SEA to be reported and published.
7. Implementation and Monitoring
   - To ensure that the mitigation measures are implanted and effective and to monitor the potentially significant environmental effects identified during the assessment.

**Further information can be found at either**

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69206/pb11726-smpg-vol1-060308.pdf **or** https://southwest.coastalmonitoring.org/wp-content/uploads/SDADCAG_SMP2/SDAD_SMP2_Strategic_Environmental_Assessment.pdf

Additional assessments that may also be required include Heritage Impact Assessments and Landscape Assessments. The need for such should be decided through consultation with statutory consultees within the scoping stage on a case-by-case basis.

Should a major change be approved, a Habitat Risk Assessment (HRA) will be required if the new sub-policy unit, policy unit or units lie within or adjacent to a European Conservation Site, or are functionally linked to them (meaning they are connected due to sediment or species migratory pathways). Updates to the existing Water Framework Directive (WFD) assessment (now replaced by the Water Shoreline Management Plans: Supplementary Guidance for Wales 35 Environment Regulations [WER]) will be required, as well as a new (light touch) Marine Conservation Zone (MCZ) assessment if newly designated MCZs may be affected. It is important that the most up-to-date information available is used to inform these decisions, which may require the collection of new baseline data. Please contact NRW within the scoping stage to identify any potential conflicts and need for new baseline data.

Depending on the conclusion of the HRA screening, an 'Appropriate Assessment' and subsequent assessment of imperative reasons of overriding public interest (IROPI) may be required.

For further information please refer to the following sections within NRWs SMP: Supplementary guidance:

- Section 11: Guidance on protected sites and how the SMPs need to consider them.
- Section 12.2.2: Guidance on the WER assessment required as part of policy reviews.
- Section 12.3.3: Guidance on the assessment of compatibility with the Wales National Marine Plan required as part of policy reviews.
- Section 12.4.3: Guidance on the assessment of compatibility with the Local Flood Risk Management Strategy required as part of policy reviews.

**Note:** These tasks may already have been undertaken as part of a strategy or scheme that instigated the policy review.

### Validation of policy based on funding risk

Although it is unanimously agreed that FCERM economics should not drive SMP policy selection, it will be important to validate if funding will be available; this is especially important where costs are going to be incurred in the near future (10-20 years' time). As specified in the SMP-r action plan template, this includes a broad estimate of costs and an initial identification of potential funding sources (FCERM grant or from third parties), and an assessment of their scale and likelihood (Funding Risk Assessment).

Section 8 within NRWs SMP-r guidance provides further direction on the Funding Risk Assessment to be carried as part of a policy review. It is also important to review the SMP specific health check reports at this point as policy units with pre-existing funding challenges are flagged.



### Stakeholder Engagement

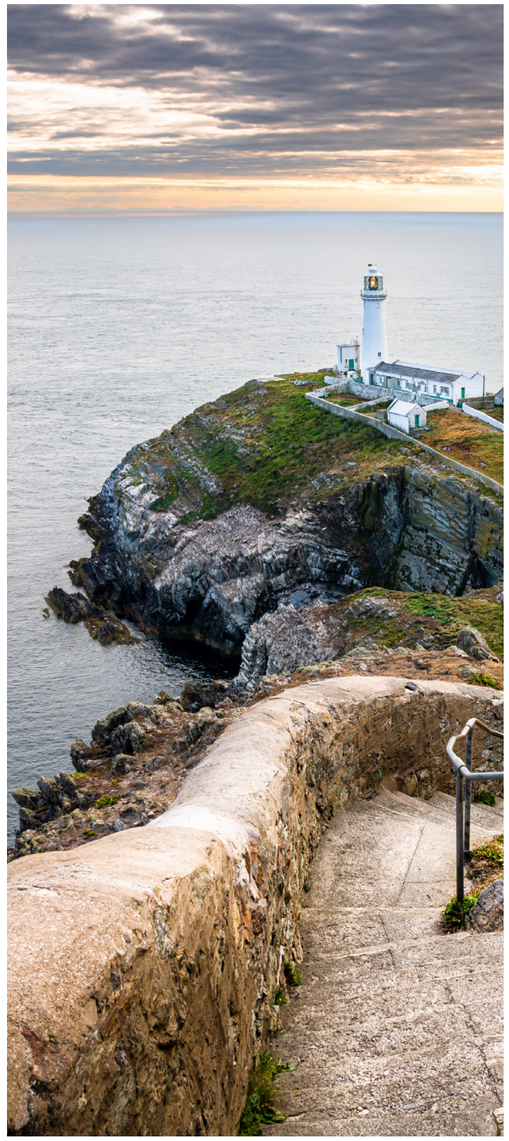
Alongside evidence gathering, part of this stage must also include public and stakeholder engagement. This is identified as key components of SMP2s Action Plans and a requirement under the Well-Being of Future generations Act and is especially important during the consultation stage within an SEA. This will form part of the evidence necessary to inform a major change proposal. Public engagement also ensures that public expectations are managed as not all change requests will be accepted. Communities impacted, private asset owners and all other stakeholders that may be impacted or have an interest must therefore be kept informed and engaged at all stages. It will also be necessary to consult with statutory bodies on environmental assessments required.

When consultation is carried out it must be done fairly and must also comply with the 'Gunning' principles. These principles state that consultation must take place while proposals are still at a formative stage; sufficient information must be put forward for the proposal to allow for intelligent consideration and response, adequate time must be given for consideration and response; and the product of the consultation must be conscientiously taken into account.

The initial stage of engagement should ensure that consultees are aware of and understand the principles behind SMP2s as well as the major change process in Wales. This will ensure that expectations are managed adequately from the offset.

Further engagement may be necessary as the process moves through the various stages.

It is recommended that a stakeholder engagement plan is created by the Change Instigator to support a major change, which could be agreed with the coastal group. A record of consultations undertaken, responses received and if/how responses have been addressed should also be documented. This will ensure transparency and facilitate consideration of the business case.



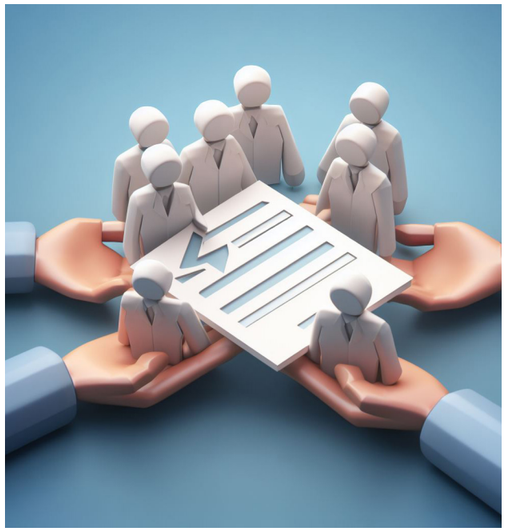


# Stage 3: Submission to Coastal Group

The business case developed to support the proposed major change including the evidence gathered in line with stage 2 will need to be submitted to the Coastal Group Lead and Change Managers for review to ensure it is sufficient to enable Change Managers to provide a recommendation to the Coastal Group.

In the case where a third party is impacted, the lead organisation/change sponsor will need to demonstrate that evidence has also been provided to this

party and that adequate consultation has been undertaken in order to demonstrate that their requirements have been satisfied.





# Stage 4: Coastal Group decision

The role of the coastal group is to ensure that sufficient consideration has been given and sufficient evidence has been gathered to understand potential impacts of a policy change to a wider area and receptors discussed in stage 2.

In light of any evidence provided a coastal group or member of may wish to ask for additional study or evidence to be undertaken to fully understand the impacts. Once sufficient evidence has been collated to enable intelligent decision, the coastal group will either support or not the organisation triggering the change.

Whilst coastal groups do not have statutory powers of decision, in the case of no support it is recommended the process finished at this stage. No support would indicate that the impacts of a policy change would outweigh the benefits of such change.

# Stage 5: WCGF Recommendation

Stage 5 should be the final stage of the process unless Ministerial approval is required. The decision to approve a major change rests with the Wales Coastal Groups' Forum recommendation.

The role of the WCGF is to either support the coastal group decision by approving a major policy change or to go against the coastal group by not supporting such a change.

The WCGF is the overarching decision-making body for SMP policy change in Wales, however if an Appropriate Assessment can't demonstrate that there would be no adverse effect an IROPI case would require ministerial approval. Similar to coastal groups, the WCGF does not have statutory powers of decision and are only able to make a recommendation.

However, it must be noted that the WCGF recommendation will inform WG decisions for any Flood and Coastal Erosion Risk Management grant in aid funding application. Any capital or revenue bid for works which does not fit with the preferred SMP policy will be likely refused. Similarly, here is a risk that any licenses or permits may not be granted by the relevant regulator.

Once a major change has been approved the WCGF Chair will formally inform WG of the decision in an agreed format. The Coastal group as 'owner of the SMP and Action plan' will be responsible for updating the SMP document accordingly and inform the relevant organisation to update the SMP Overview for Wales Master document, the Action Plan master document and the relevant information within Lle website.

**Note:** Whilst this is currently done by NRW it may potentially change in the future.





# Appendices

**Appendix 1: Hierarchy of policy change in SMPs**

| Degree of policy change | Description of Action |
|---|---|
| **Minor** | • Textual and mapping corrections with no effect on context or outcomes of the SMP<br>• Changes within organisations that may have a bearing on SMP implementation. |
| **Moderate** | • Textual or mapping corrections where the context of the SMP is affected;<br>• Changes, additions or deletions in the action plan that may impact on SMP implementation but do not change an SMP policy option. These might include changes to the timescale or priority of an action, a new study or scheme proposal, or alteration to the scope of a study/scheme already proposed.<br>• Changes potentially impacting a nationally designated site, e.g. SSSI, NNR, AONB, SAM. |
| **Major** | • Changes to a policy, or epoch in which a policy is to be implemented, or changes to the action plan that are likely to result in this;<br>• Changes to the action plan that are likely to significantly impact on SMP implementation, such as significant new schemes and studies, or significant changes to existing ones;<br>• Mapping corrections that affect the number of properties protected from flooding or erosion;<br>• Changes with the potential to have adverse effects to an internationally designated site, e.g. SAC, SPA, Ramsar (informed by a test of likely significant effect). |

Welsh Coastal
Groups Forum

## About the Welsh Coastal Groups' Forum:

The Welsh Coastal Groups' Forum is a non statutory group which represents the collective interests of coastal groups and stakeholders with an interest on the coast. It provides and communicates the strategic direction to coastal groups on coastal risk management matters.

Membership is made of local authorities, Natural resources Wales, Welsh Government, Network Rail, National Trust, and the Welsh Local Government Association.

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For further information, please contact the Wales Coastal Groups' Forum or your relevant Coastal Group

Wales Coastal Groups' Forum:
**WCGF@wlga.gov.uk**

Severn Estuary Coastal Group:
**severn@cardiff.ac.uk**

Swansea & Carmarthen Bay Coastal Group:
**SCBCEG@valeofglamorgan.gov.uk**

West of Wales Coastal Group:
**GAGC@gwynedd.llyw.cymru**

Liverpool Bay Coastal Group:
**Katie.Eckford@sefton.gov.uk**

