

The draft National Strategy for Flood and Coastal Erosion Risk Management in Wales



Response from Natural Resources Wales

Supplied via email to FloodCoastalRisk@gov.wales

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QUESTION 1

The aim of the National Strategy is to 'Ensure the risks to people and communities from flooding and coastal erosion are effectively managed'.

Is this clear and understandable?

YES or NO

If not, please explain how it can be improved.

YES, but with some caveats and points to consider. As well as conveying the **risk to life** presented by flooding, the sections setting out the Aim needs to convey the **long-term** nature of the challenges, particularly the need for **climate change mitigation and adaptation**. Plus the need for a **multi-sectoral** and **societal response**, and the need for **collaboration**. The Strategy would benefit from spelling out a **long-term Vision**, within which this Aim (and the Objectives and Measures) sits.

- 1.1 It is useful to have the overall Aim articulated in a single sentence, and we broadly support it. The emphasis on the 'risks to people and communities' reflects the serious, direct and at times devastating impacts of flooding on people. Floods can cause loss of life, and it is important to have an Aim that reflects the very serious impacts of the issue.
- 1.2 The phrase 'effectively managed' does lead to the question as to how, and this usefully leads on to the Objectives. But there is the question as to how to measure delivery against this Aim, and what is meant by 'effectively managed'.
- 1.3 The attractiveness of the simplicity of a single sentence Aim risks not conveying the full context or capture the magnitude and long-term nature of the challenges, particular in regard to climate change. The Climate Emergencies declared by Welsh Government and many authorities in Wales (and throughout UK) show the scale of the issues, both locally and globally, and frame the required responses. The Strategy should be strengthened in regard to climate change, and the urgent need for plan for and deliver both mitigation and adaptation. This is most significant on the coast but also applies to inland catchments, with more frequent extreme weather events being predicted.
- 1.4 The scale of the challenge also requires all sectors of society being involved in the response. There is a risk that the Strategy concentrates on the role and actions from the Risk Management Authorities (RMAs), and underplays the need for active involvement from, and with, other sectors and players. The response to climate change is a societal one, wider than just the flood risk sector and this should be emphasised throughout the Strategy.
- 1.5 The Aim could therefore be enhanced by adding 'by working collaboratively, adapting to the challenges of climate change'.
- 1.6 Many of the Measures are due in the next few years and are not long-term in their nature. This is understandable in terms of including targets that are clear, specific and near-term, and it is important that the Strategy is realistic in what it requires already stretched RMAs to take on as additional tasks or activities. However, it risks being perceived as a short-term response to perhaps the biggest challenge of our age.

- 1.7 There is therefore a need to balance the longer-term aspiration with shorter-term actions. An approach could be to set out a compelling Vision of the future we want in relation to long-term flood risk management in the context of a changing climate, then, how this Strategy (and the Aim, Objectives and Measures) will help to work towards this longer-term Vision, over its 8-year duration.
- 1.8 There is a need to strengthen, throughout the Strategy, the linkages to the new legislation (since the last strategy) - principally the Well-being of Future Generations (WCFG) Act and the Environment (Wales) Act. Key concepts contained in these Acts are important to effective management of flood risk, in the context of overall environmental management, and underpin all activities contained in this draft Strategy. This includes the ways of working within the WCFG Act and the principles of Sustainable Management of Natural Resources (SMNR) in the Environment Act (such as working collaboratively and across sectors, place-based integrated and innovative approaches that seek wider benefits).
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QUESTION 2

Are the objectives and measures clear?

YES/NO

If not, please explain how they can be improved.

Mostly **YES**, but with some caveats, points that require clarification and some elements that we do not agree with. This includes comment that the Measures are generally short-term, and would benefit from explanation of how they are part of achieving a **longer-term Vision**. There is little mention of **skills and capacity** to deliver, and few references to **roles we need others** (outside of Risk Management Authorities) to play. Greater emphasis needs to be placed on the need for sustaining **revenue-funded activities**, including maintenance of current assets.

Overall comments:

- 2.1 The five Objectives collectively are a good articulation of the areas to focus on during the life of the Strategy, and should provide a good framework around which the required activities can be corralled. However, they risk missing some key areas or concepts.
- 2.2 For example, they do not portray the need for considering all the options to deliver effective risk management actions appropriate to the location and the risk, whilst maximising wider benefits and opportunities. It is important that the highest risk locations are identified and then consideration given to *all* appropriate options to manage that risk, including adaptation, doing less and potentially not defending some communities (and, in extreme circumstances, relocation).
- 2.3 Also, as for comments on the Aim under Q1, the attraction of the succinctness of the Objectives needs to be balanced against the risk that they do not fully reflect the underlying requirements of the new legislation in Wales. It is important that this wider context is fully portrayed in the sections that give the detail on the Objectives.

- 2.4 The Objectives do also put a lot of the onus on the Risk Management Authorities for action, with the risk of losing the point (made under Q1 above) that the challenges and opportunities need collaboration and action from a wider range of players, across different sectors. The scale of the climate change challenges means that we need strong and effective collaboration, to plan for and implement the adaptation measures that are required.
- 2.5 As explained in response to Q1, the Measures associated with the Objectives are generally over the short-term, which detracts from the long-term nature of the challenges. There is a need to spell out the compelling vision of the future that we want under each Objectives (for example, in the form of what 'excellent' would look like) and then make the link to explain how the Measures are the first steps to achieve this.
- 2.6 The Strategy does not discuss the capacity and capabilities in the sector for delivery of the Aim, Objectives and Measures. RMAs have had reductions in baseline revenue budgets in real terms over the last few years. There are real challenges in being able to deliver all the current activities, and provide a sustained and effective response to flooding to the standards expected. This can be exacerbated by the (well-intentioned) aspirations of new legislation. Against this backdrop, it will be challenging to also deliver new initiatives and new Measures.
- 2.7 Given this context, there is a need to assess the skills and capacity challenges in the sector, and the development of an action plan to address these challenges. This could be an additional Measure, and a funded project, potentially delivered by an external (to RMAs) organisation (so as not to add to the workload).

On the specific Objectives and Measures:

- 2.8 **Measures 1 and 2** appear before the Objectives are described. Measure 1 is referred to in our response to Q5. Measure 2 does seem a little out of place and very specific. It could usefully make wider reference to the products of the Wales Coastal Monitoring Centre (WCMC), and its future.
- 2.9 Comments on **Objective A** and **Measures 3 through to 10**, are included under Q3.
- 2.10 Moving on to **Objective B**, we support the intention of this objective (note though, to be consistent with other objectives, it needs a verb associated with it). There is a very strong link between Objectives A and B, with the understanding of flood risk and the evidence being used to frame the communication of the risk, which is needed to raise awareness, promote action and build resilience.
- 2.11 The awareness-raising element of this objective is a challenging area for NRW (and all RMAs), with resource limitations meaning our role is a limited facilitating one rather than direct doing. There are statements that more will be done with schools and young people (para 54 for example) but it is not clear who will do this and how. In particular, the Flood Awareness Wales initiative referred to in the document in several places (e.g. para 186) is not operating at the level it was, and so statements saying this should continue (as it was) are misplaced. NRW is starting a review of its awareness-raising activities, informed by the evidence and research information available.
- 2.12 'Building resilience' is an oft-used phrase but not well defined, with no common understanding of what it means. It needs to incorporate the need to adequately plan and

- prepare for flood risks, as well as adapt to the climate change challenges of the future. It would be useful if the Strategy included a definition or explanation of the term.
- 2.13 We agree with the sentiment of **Measure 11**, but would welcome the opportunity to further discuss the wording and timescales to ensure it reflects what is deliverable in the timeframes required.
- 2.14 **Objective C** (prioritising investment to the most at risk communities) is an important pillar of WG's approach to FRM, which we support in principle. We have developed tools and processes to help achieve this, and it is an important element of risk management. However, care is needed in its explanation, or there is the risk this is portrayed as meaning capital investment is appropriate in all high-risk situations – which is not the case.
- 2.15 The response to the risk of flooding can and should involve a range of measures, not just capital build. Flood detection, forecasting, warning and informing, development control and advice, awareness raising, incident management, planning for climate change adaptation - all underpinned by flood mapping and modelling – are all important interventions that need prioritising and support.
- 2.16 However, this section of the document concentrates on capital investment in schemes, including substantial amount of text on Natural Flood Management (NFM) and hybrid schemes. It does not cover the need for investment and maintenance of the flood risk management infrastructure we already have – both physical and human. For NRW, this is the first draw-down on our activities and funding, and we would like to see this feature much more prominently in this section and elsewhere in the Strategy.
- 2.17 The need for whole catchment approaches, linking up across all sectors and thinking about all options to manage flood risk, are hugely important. For example, there is a big interface with land management, which is wider than Natural Flood Management. There is a risk that this section puts undue emphasis on NFM (compared other FRM measures, see para 2.15), partly by the length of this section of the Strategy. It is recognised however that there is increased interest in the potential for this area and it is right to advocate its use where appropriate and take proactive steps to encourage that - but it needs to be in proportion, to the flood risk and to the other FRM options available.
- 2.18 We support the sentiment of **Measures 12 and 13**, to investigate mechanisms to promote and utilise wider catchment approaches, including NFM and hybrid schemes, where they are appropriate for the flood risk problem and locality. But care is needed: it is not about just delivering 'more NFM schemes' (Measure 12) and it is not just about counting them (Measure 13). We have been working with WG and RMAs on this agenda already. We comment further on this topic under Q6.
- 2.19 We comment on **Objective D** and associated **Measures 14-17** under Q4.
- 2.20 We support **Objective E**. We also support the intent of Measure **18** in seeking good information on actual flooding, but would flag the difficulties associated with comprehensive immediate reporting of all impacts.
- 2.21 We comment on **Measures 19 and 20** under our response to Q7.
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QUESTION 3

Do you agree with Objective A: Improving our understanding and communication of risk?

YES/NO

Any comments on these new objectives

YES, with some comments:

- 3.1 We agree **Objective A** is a hugely important area – flood risk cannot be effectively managed unless it is well understood, communicated and acted upon. There is a risk though that this section reads as a description of the current risks and plans, without incorporation of the future risks associated with climate change, and the need for widescale adaptation.
- 3.2 This section of the document, and other sections too, do feature coastal risk and challenges quite prominently. This is right as the coastal risks are particularly significant, but this runs the risk of down-playing the inland risks. There does need to be more of a balance. Plus, consideration as to whether the background information in this section (e.g. on Shoreline Management Plans) detracts from the future actions (and might be better placed in an appendix or elsewhere – see also comments under Q12).
- 3.3 In communicating the risk, it is not only for the public, it is also important it is conveyed effectively for decision-makers, both in public sector (e.g. other WG departments) and private sector (e.g. developers). This section does tend to concentrate on the public, and on production of the risk information itself, and not on how we reach the objective of helping others to understand that risk. It could be argued that it is more important to convey the impacts associated the risk ('how bad will it get?') in broad terms, rather than ever-increasing precision in the quantification of the risk, using language which is perhaps difficult to understand for the general public. The challenges (even if we do not have all the solutions) should be better described in this section.
- 3.4 There are inherent uncertainties in the data, especially when future projections are incorporated. This poses challenges in how the information is communicated. This section would benefit from an explanation of that. It is not a case of just doing some model runs and publishing some data. There is a strong link to Objective B in how this gets communicated to best effect.
- 3.5 The Measures associated with **Objective A (Measures 3 through to 10)** are all required and supported in principle, though we would welcome further discussion (and agreement where the action is with NRW) with WG on the scope, actions, and delivery dates, as we do not agree with some of the specifics. In addition, some of the terminology needs definition and agreement, such as 'critical assets' (Measure 6).
- 3.6 We would also suggest alterations to some of the text. For example, Figure 7 refers to a 'very low' category, which is not in the new Flood Risk Assessment Wales, and terminology around 'risk' differs for risk mapping and development planning. We would be happy to share comments and observations like this with the WG team.

QUESTION 4

Do you agree with Objective D: Preventing more people becoming exposed to risk?

YES/NO

Any comments on these new objectives?

YES, but with some comments, particularly on Measure 17 which we do not agree with in its current form.

- 4.1 We strongly support the introduction of an Objective on development control and planning. We are encouraged by the use of the word 'preventing' in the headline, but the challenge will be whether this is truly achievable. For example, risk will increase as a result of climate change, a growing population and associated development pressures; can we truly prevent more people being exposed to that increased risk?
 - 4.2 The strong links to the revised (draft) TAN15 are likewise very welcome and supported.
 - 4.3 We have some comments around process and details in this section and in the Measures, and would be happy to supply these to WG officials. For example, different use of the term 'high risk' in places, and the fact that SUDs applies to all new developments, not just housing (para 222).
 - 4.4 We do not fully agree with **Measure 17**, and would welcome further discussion with WG officials, and WLGA/WCMC. Some recent studies have highlighted the challenges associated with monitoring for coastal squeeze, which we need to consider fully and use to shape this Measure.
 - 4.5 We feel that the Strategy is at risk of overstating the potential for the National Habitats Creation Programme, in being able with its current scope to deal with all impacts related to coastal habitats that could arise from FCERM activities. It is recommended that the Strategy includes clearer support for delivery of compensatory measures, and a reduced focus on monitoring of coastal squeeze (because research has shown that this is extremely difficult and carries significant uncertainty, which means it cannot be used to manage the infraction risk). Our response to the Habitats Regulations Assessment also highlights concerns relating to NHCP, and in particular the level of support provided by the Strategy itself for the effective delivery of this sole compensatory measure.
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QUESTION 5

Does the National Strategy clarify roles and responsibilities in relation to flood and coastal risk management?

YES / NO

If not, how could it be improved?

YES, in terms of helpfully clarifying the overall roles but **NO** in terms of **inaccuracies** in some of the comments, particularly when describing **legal responsibilities**.

- 5.1 Figures 5 and 6 are useful summaries of the main groupings and relationships between them, and Section 4 is a useful attempt at summarising the main points that does go a long way to help clarify roles and responsibilities.
 - 5.2 However, it does not accurately portray the duties, powers and responsibilities of NRW according to the legislation, for example around responsibilities on asset ownership, reservoirs, and NRW's strategic oversight role. We would request that we work with WG to refine the accuracy of this section.
 - 5.3 Given the scale of the coastal adaptation challenges faced by the nation (referred to in the Strategy, and earlier in this response), we would suggest a review of the composition and remit of the Coastal Groups and Wales Coastal Group Forum. This is not a reflection on the current work of the groups; it is a reflection that the scope of the challenges requires a response which is bigger than the RMAs and flood professionals.
 - 5.4 We would also advocate consideration of a Wales-wide flood forum for all RMAs. This could be a platform for any information sharing or collaborative work. No such forum exists, and it would seem possible with the relatively few RMAs in Wales that such a forum could serve a useful function.
 - 5.5 We understand the role and purpose of the Wales Flood Group, but it does seem to operate in isolation to the rest of the FRM structures (and as shown by Figure 6). Is there or should there be a way to better 'stitch it in' to the FRM community?
 - 5.6 Given the comments above, we would suggest that **Measure 1** could usefully be adjusted to incorporate a review of the roles and responsibilities all the relevant groups, as this sits well with consideration of the legislation. Clarity on where decisions are made, and governance, are crucial elements of effective delivery.
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QUESTION 6

Does the section on Natural Flood Management and hybrid schemes adequately promote their role in managing risk?

YES / NO

If not, how could it be improved?

YES (it is right to flag and promote these as options) and **NO** (in that this section, as is, risks giving undue emphasis to these options)

- 6.1 Natural Flood Management and hybrid schemes are an important option for flood risk management. They are part of wider thinking, about managing the catchment as a whole, and the multiple benefits that can bring and link well to the well-being goals and principles of SMNR. This is an important concept that we support, and is central to NRW's core purpose. It is important that this holistic catchment-wide thinking is promoted when solutions are sought. It is central to the Natural Resources Policy, Area Statements and in supporting ecosystem resilience.
- 6.2 It needs to be clearly recognised that NFM and hybrid schemes are part of the basket of measures that can be utilised. They incorporate a wide range of different interventions, that may be suitable in some circumstances. It is generally accepted that NFM measures on their own do not have sufficient impact on the very large flows that main river flood schemes require, for example. There are other challenges as well, such as access to land and ensuring the maintenance and funding are assured for the life span of the scheme. They generally have a more positive impact on smaller, more localised flows.
- 6.3 As the benefits of such interventions can be wider than water level management, the sources of finance are not just limited to FRM budgets. An important link (that the Strategy makes, but could stress more) is to other sectors, such as the agricultural sector. But there is the risk that FRM looks to other sectors to fund and deliver, and other sectors look to FRM to fund and deliver - this is an area where real collaborative work is required. There are opportunities to do so through the Area Statements and Natural Resources Policy, and NRW is seeking to do this. It is about using the evidence, identifying the opportunities, and facilitating the delivery – where appropriate.
- 6.4 Different people and organisations will have different views on the place of NFM. The middle ground is that NFM measures have their place and should be actively promoted where appropriate to do so. The steps already taken, and those proposed in **Measures 12 and 13** in this section, are a useful starting point. But (as stated under Q2) care is needed: it is not about just delivering 'more NFM schemes' (**Measure 12**) and it is not just about counting them (**Measure 13**). It is important the measures reflect the need to improve the evidence base, understand and consider the core 'blockers' (potential and real) to NFM use and identify the opportunities for appropriate use of NFM. The options for delivery (including funding, and potentially incentivisation) and the need for the production of guidance on routes to delivery also need to be fully explored.
- 6.5 The wider question is whether more can be done, including through this Strategy, to promote cross-sectoral (and cross department in WG) collaboration to deliver projects

that consider catchment approaches, with multiple benefits (and not just NFM projects). Is there scope to turn this into a Measure? This concept also extends to the approaches needed for coastal adaptation – this section of the Strategy majors on inland catchments but there are NFM approaches that can be utilised on the coast. These are big challenges (and opportunities), and not just for FRM sector and RMAs.

QUESTION 7

Does the National Strategy clearly set out what we fund?

YES / NO

If not, how could it be improved?

YES, in that it gives an overview, but **NO** in that it emphasises present capital funding arrangements, and underplays other areas such as revenue funding requirements.

- 7.1 This section concentrates on capital funding processes, with the risk that the need for revenue funding is underplayed (though it is referred to, for example, in para 278). Revenue funding is required for all the ‘other’ (non-capital build) FRM work (described under points 2.15 and 2.16, under Q2). Such points should be made at the start of this section in the Strategy.
- 7.2 For example, we have large existing (and ageing) asset base that requires maintenance. It is important this maintenance work is prioritised, and the Strategy recognises it is not all about building new schemes. Further, the emphasis on new assets contrasts with the increasing need to withdraw from assets that do not protect property and are low risk and low priority, and in some cases ‘uneconomic’ (the costs significantly outweigh the benefits). Withdrawal of maintenance is itself an activity that usually takes resource (time and budget) as it cannot simply be handed over to another party or stopped without some work. The Strategy does not cover these important issues.
- 7.2 This section describes several aspects of funding and current practice, which has the risk of over-shadowing the big strategic questions. As per previous comments, it may be beneficial to separate out current practice to an appendix or separate document.
- 7.3 It is good that there is a sub-section on wider benefits and contributions, but this does not fully make the link to other sources of funding, such as from the agricultural sector or regeneration sector. Nor does it explain how contributions can be levered in, and the mechanisms for doing it. It is noted that **Measure 20** requires the Flood and Coastal Erosion Committee to explore the opportunities and report by end of 2021, and this is welcome.
- 7.4 There are other elements of funding which remain problematic, and consideration could usefully be given to these in the Strategy and possibly within Measure 20. For example, levering in funding from different sources for coastal adaptation, especially if there are few or no properties at risk; making funding available for innovative solutions; seeking contributions or partnership funding at a national level where appropriate,

rather than a scheme-by-scheme local level; ensuring that nature-based solutions are not disadvantaged by funding mechanisms.

- 7.5 Long-term funding is an issue, and we support the inclusion of **Measure 19**. This fits in well with the points made earlier in this response about the Climate Emergency and the large and long-term nature of the challenges. The timescale for this measure is challenging and may need to be reviewed, and the needs fully scoped before we can commit to a proposed deadline.

QUESTION 8

Are there any other key issues or trends that you think should be considered in the Strategic Environmental Assessment – Environment Report?

YES / NO

If yes, please explain how it can be improved.

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- 8.1 Natural Resources Wales is a statutory consultee on the Strategic Environment Assessment and Habitats Regulations Assessment. We will be making a separate response to these assessments, and therefore we are not commenting on this question in this response.

QUESTION 9

Are there additional environmental effects (including those on humans) that need to be considered when developing the Strategy?

YES / NO

If yes, please explain how it can be improved

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- 9.1 See comments under 8.1 – we will respond to this under the separate SEA and HRA responses.

QUESTION 10

We would like to know your views on the effects that National Strategy for Flood and Coastal Erosion Risk Management would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

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- 10.1 It is important (and a requirement) that all services are available in Welsh and English. NRW has developed its own separate services after vesting and separation from the Environment Agency, and has ensured that Welsh Language opportunities (as well as requirements) are optimised in these services.
- 10.2 Local FRM interventions provide good opportunities for promoting local jobs which helps strengthen communities, including Welsh-speaking communities.
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QUESTION 11

Please also explain how you believe the proposed National Strategy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

11.1 See response to Q.10

QUESTION 12

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

- 12.1 This response is a summary of main points we wish to make. NRW has more detailed comments on specific points and sections of the draft Strategy, which we would be happy to discuss with the Welsh Government team.
- 12.2 The Strategy document is quite heavy on background, is there an argument that this background would be better incorporated in a separate document or separated out to an appendix? It is helpful to have the background, but there is the risk that this detracts from the main messages and the forward-looking, big-picture purpose of a strategy.
- 12.3 The Strategy has a lot of 'we would like to see' statements. There is the risk that this is not sufficiently strong and directive language to drive delivery of the Aim, the Objectives and the Measures. We would advocate that this language is reviewed and strengthened where appropriate, otherwise we will not see these actions implemented consistently across Wales.
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- 12.4 There is little mention of flooding associated with exceedance in drainage systems, including combined sewers. Para 70 states that sewer flooding is not addressed in this Strategy and this is reasonable for separate foul sewers. However, flooding due to exceedance in drainage systems is a significant problem and involves water companies, LLFAs and highways agencies. There is discussion of SuDS under Objective D, but this is only one facet of the issue. Also, there is little in the Strategy on actions for the water companies (who are a RMA).
- 12.5 Similarly, there is little discussion on the challenges posed by surface water or pluvial flooding – flooding before water gets to drains or watercourses, particularly as a result of high intensity short duration rainfall that can cause flash flooding. The likelihood of this type of flooding is likely to increase due to climate change. The Strategy could highlight the potential for NFM to address such issues. It also ties well to SMNR, increasing resilience and contributing to well-being goals.
- 12.6 There is also little mention of the potentially catastrophic risks from reservoir flooding (as seen recently at Whaley Bridge). This is an area with significant investment requirements.
- 12.7 It is important that these sources of flooding (12.4-12.6 above, plus the potential for combined flooding), and steps to address the risks associated with them, feature more prominently in this Strategy, to provide that strategic focus on all sources of flooding.
- 12.8 Early sections of the Strategy make reference to Well-being of Future Generations Act, but the document does not make wholly effective links to the Environment Act, State of Natural Resources Report, Natural Resources Policy, Area Statements, or the roles of Public Service Boards and Well-being Statements. Nor does it make an effective link with River Basin Management Plans and Flood Risk Management Plans.
- 12.9 Further to 12.8, there is little discussion on the potential opportunities to work through Public Service Boards, as a vehicle to engage with key local stakeholders and decision-makers on big strategic and long-term issues, such as flooding and climate change.
- 12.10 Wales shares catchments with England, and citizens work and travel across political borders. There is a need to work with colleagues across the shared border to ensure catchments are effectively managed, and services (where appropriate, for example on flood warnings) are aligned. This needs to be captured in this Strategy.
- 12.11 We have made some comments elsewhere (e.g. section 6) but would reiterate the potential for FRM and wider benefits through good land management practices and incentives, which we feel does not come across strongly in this draft Strategy, and could be enhanced. Also, the potential for working across sectors to ensure land and water are managed effectively to reduce run off and flood risk. This includes promoting good catchment management practices, including links to woodland planting to deliver environmental improvements, ecosystem resilience and wellbeing; plus making links to make to the Welsh National Marine Plan.

END