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## Consultation – summary of responses

# Flood and Coast Investment Programme

Date of issue: June 2015



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## Introduction

The Welsh Government is the primary funder of flood and coastal erosion risk management in Wales.

Understanding flood and coastal erosion risk and prioritising investment is a fundamental principle of the Flood Risk Regulations 2009, the Flood and Water Management Act 2010 and the National Strategy for Flood and Coastal Erosion Risk Management in Wales (published in 2011).

Within the National Strategy, *prioritising investment in the most at risk communities* is one of the four key objectives with a sub-objective to this stating that Welsh Government should: *“Develop a National Programme of Investment for flood and coastal erosion risk management”*

This is in line with the Welsh Government Programme for Government and complements the approach to securing a better Wales in the Well Being of Future Generations Act. Targeting investment will help to ensure that resources are used efficiently, will enhance the resilience of our communities and infrastructure and ensure that Wales remains a safe place to live, work and invest.

The proposed Flood and Coast Investment Programme (FaCIP) will develop a methodology for prioritising funding to those areas at highest risk and in doing so create a clear, objective way of directing funds to places at risk from all sources of flooding and coastal erosion.

It is proposed that the programme will use a national Flood Risk Index to combine multiple sources of flood and coastal erosion risk to allow for comparison of different areas simpler. This will then be used to direct investment to the most appropriate areas.

Following the coastal flooding around Wales during the winter storms of 2013/14, Natural Resources Wales carried out a 2 part review identifying the impacts and costs associated with the storms and putting forward 47 recommendations for future improvements. A number of these recommendations were focussing of funding for flood and coastal erosion risk management and recommendation 29 was around the development of a programme of investment (FaCIP). The completion of this consultation will also assist in progressing this recommendation.

This document provides a summary of responses that have been received to the consultation on the Flood and Coastal Investment Programme which will be used to inform the development of the programme.

## **Consultation Process**

The consultation was developed to consider the way that Welsh Government allocates funding for flood and coastal erosion risk management in Wales to ensure funding is focused towards those places at greatest risk.

The consultation looked at a number of questions on how the programme would operate using a spatial understanding of flood risk to help make more informed, area based decisions on funding.

The consultation began on 17<sup>th</sup> December 2014 and closed on 6<sup>th</sup> March 2015, receiving a total of 34 responses. The consultation was placed on the Welsh Government website and sent to relevant stakeholders.

## **Executive Summary**

The development of a Flood and Coast Investment Programme and a National Flood Risk Index was generally well supported by respondents to this consultation, welcoming the opportunity that this would bring to provide a clear and transparent way of assessing and understanding flood risk.

In compiling this summary of responses to the consultation, a number of reoccurring themes were identified, particularly around the development of the Flood Risk Index and funding.

In discussing the Flood Risk Index there was concern raised about how an index that will combine fluvial, coastal and surface water flood risk could skew investment towards coastal local authorities where there is a potential risk from all three sources, therefore disadvantaging inland local authorities who will never have any coastal risk. Groundwater was also identified as an increasing issue and something that should be considered further for inclusion within the Flood Risk Index.

The majority of respondents agreed that risk from coastal erosion should be treated separately from flood risk, particularly as this could cause further bias towards coastal regions by combining these two types of risk. The impacts of coastal erosion can be very different to that of flooding, in some cases the permanent and irreversible loss of land.

There is a need for the programme to consider not only areas of national concern, but also to use data and knowledge to identify local issues and smaller scale, lower value solutions such as individual property protection and improved warnings and resilience measures. Local knowledge also provides more potential to gain buy-in and acceptance of schemes with local communities. The programme will also need to consider how areas will be prioritised between low frequency but high consequence events and more regular low impact flooding.

There was a general consensus that data on existing defences should be included within the Flood Risk Index to avoid investment being targeted towards areas that are already benefitting from defences. The Flood Risk Index should be developed and updated regularly to reflect new defences and the reduced risk of flooding. The first part of this would therefore be to compile a full list of the defences around Wales and their current condition.

Funding was identified as an issue within the consultation responses particularly questioning the currently proposed exclusion of revenue funding from FaCIP. It was felt by many that both capital and revenue should be included within the Programme from the start, especially as the two are linked in terms of maintenance and improvement of new and existing defences. Local authorities in particular raised concerns about funding, uncertainty of future budgets and how this may impact on new and ongoing work. Questions were put forward for consideration of the board on flexibility of future funding within the programme to run over financial years and simplification of local authority grants. There was also the important question raised for consideration of how emergency repairs will be funded through FaCIP in the future.

Moving forward with FaCIP and the Flood Risk Index, the way this is communicated to the public needs careful consideration. The public need to understand the process and reasoning behind the decisions made. Mapping of flood risk areas, if made public, needs careful communication to avoid confusion and unnecessary concern, particularly if defence data is not included, as this may result in an incorrect interpretation of risks faced. Clear communication with the public will allow for them to be aware of ongoing work to reduce flood risk, how and why public money is being spent in certain areas, achieve local buy-in to schemes and provide the public with an opportunity to discuss and challenge decisions made using local knowledge of an area.

The consultation proposed the use of Lower Super Output Areas (LSOAs) for assessing and scoring flood risk; this provided a mixed response from consultees and therefore may require further consideration. Concerns were raised around where impacts of flood risk cross boundaries and around the potential to miss smaller areas at high risk within a wide area LSOA. In larger LSOAs, there was concern that this would only highlight flooding from main rivers and the sea, missing out on local sources of flooding affecting smaller numbers of properties on a more regular basis. Information for assessing flood risk is already available and has been used for other work such as Preliminary Flood Risk Assessments, Flood Risk Management Plans, Local Flood Risk Management Strategies and Shoreline Management Plans.

In terms of Governance of FaCIP, it was agreed that there is a need to bring together a multi-agency board to oversee the Programme and assess applications. The responses to the consultation also put forward various suggestions on additional people who might be considered for inclusion on the board to govern FaCIP.

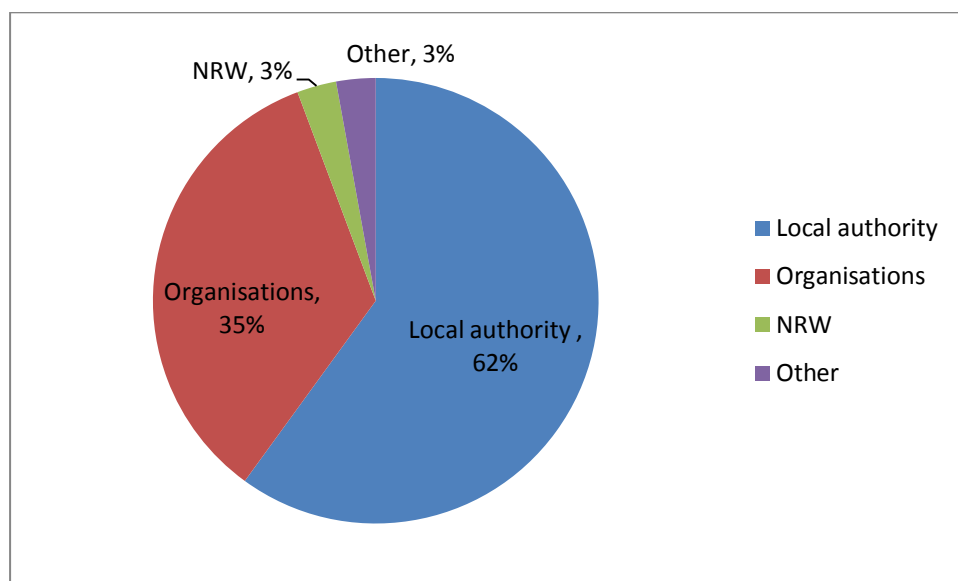
A number of suggestions/ideas were put forward within the responses that could be considered further:

- The establishment of a Minor Works Fund within FaCIP could provide an opportunity for smaller scale schemes and funding for individual property protection to be progressed.
- A separate fund, top sliced from the FaCIP budget, for coastal erosion related work or to take forward SMP policies in areas highlighted at future risk with loss of properties or key infrastructure due to permanent loss of land.
- Risk assessment could be based on 1 in 30, 100 (200 for coastal) and 1000 for fluvial flooding and 1 in 10, 5 and 1 for surface water flood risk.
- The presence of existing defences could be given a separate score within the Flood Risk Index, similar to the proposed way of dealing with coastal erosion.
- To address the issue of disproportionate funding to inland local authorities it was suggested that FaCIP could be made up on two programmes, one focussing on coastal flooding and erosion and one for riverine and surface water flood risk.

## Responses to Consultation Questions

The consultation asked 12 questions to obtain views on the proposed way that the Welsh Government allocates its funding for flood and coastal erosion risk management to focus on those areas at greatest risk.

Figure 1 below shows the breakdown of respondents. A full list of respondents is provided at Annex 1



**Figure 1:** Respondents to consultation

### Question 1 - Do you agree with the general need for a Flood and Coast Investment Programme as put forward?

Strongly agree	9
Agree	21
Neither agree nor disagree	0
Disagree	0
Strongly disagree	1
No response provided	3

The first question looked for responses on the general need for a Flood and Coast Investment Programme. 31 responses were received to this question of which 91% agreed or strongly agreed with the need for such a programme. Only one negative response was received

The comments received were generally very supportive of the proposals for the programme and respondents were keen to see a fair and transparent methodology of prioritising investment for those communities with the highest flood risk. This programme was seen as a positive way to significantly improve the efficiency and effectiveness of the delivery of flood risk management across Wales. Respondents

identified the need to align the priorities of FaCIP with other key flood and coastal erosion strategies and policies including Shoreline Management Plans, Flood Risk Management Plans, Innovative Finance Coast Programme and upcoming Bills (including the Environment Bill and the Well Being of Future Generations Bill). With the uncertainty of availability of future funding levels and reduction in EU funding, consideration of this investment programme at this time seems very appropriate, especially if it leads to additional partnership working and funding

Some of the key areas where consistent comments on the programme were received in response to this question were around the following:

- Development of a flood risk index
- Funding issues/questions, particularly around capital and revenue funding
- Project appraisal guidance
- Importance of local schemes/initiatives

Comments included:

#### Development of a flood risk index

- The way in which the flood risk index is developed and maintained is paramount in ensuring that the assessment process is objective across all sources of flood risk. There is a fear is that the Flood Risk Index will simply be an extension or expansion of an existing prioritisation tool, which will not lend itself to an objective assessment of “all sources of flood risk”.
- Consideration should be given to landlocked authorities who may obtain a lower flood risk index

#### Funding

- Funding should be shared on the basis of an objectively calculated risk index with funding going to the measures with the greatest potential to reduce risk and where possible provide multiple benefits
- The entire Flood and Coastal Erosion Risk Management funding (capital and revenue) needs to be examined, not just the capital. If FaCIP is not to include revenue, a clear alternative means of assessing revenue funding for Lead Local Flood Authorities needs to be developed and implemented.
- Capital and revenue investment are intrinsically linked, capital investment into new defences will require associated revenue for maintenance of these assets.
- Revenue funding allocation system needs reviewing; current funding allocation to LLFAs is insufficient to meet all their maintenance needs. It is therefore recommended that revenue funding is included from the start or a suitable alternative which meets the needs of LLFAs and ensure they can fulfil their statutory duties.
- This proposal appears a missed opportunity for a “right first time” approach to create a programme encompassing both revenue and capital funding from the outset.
- By combining multiple sources of funding, FaCIP has the potential to further enhance collaboration and joint schemes between RMAs, which in turn promotes better use of public funds.
- FaCIP funding should include Wales Habitat Creation Programme, Flood Awareness Wales, Coastal monitoring, hydrometric improvements, investments



in nationally and business critical IT systems (flood forecasting and warning) and operational costs.

- In contrast to the earlier comments, one response raised concern that using the proposed Flood Risk Index to allocate revenue funding to LLFAs in the future could jeopardise the ability of some LLFAs ranked low in the Index to access revenue funding for simple maintenance work.

#### Project Appraisal Guidance

- Nationally consistent appraisal guidance is an essential component of a consistent and coherent national risk based investment programme. The proposed review of guidance should ensure that projects are delivered in line with environmental legislation and seek to deliver multiple environmental outcomes through all RMA projects.
- There is a need for consistency of appraisals and the confusion currently created by multiple appraisal guidance

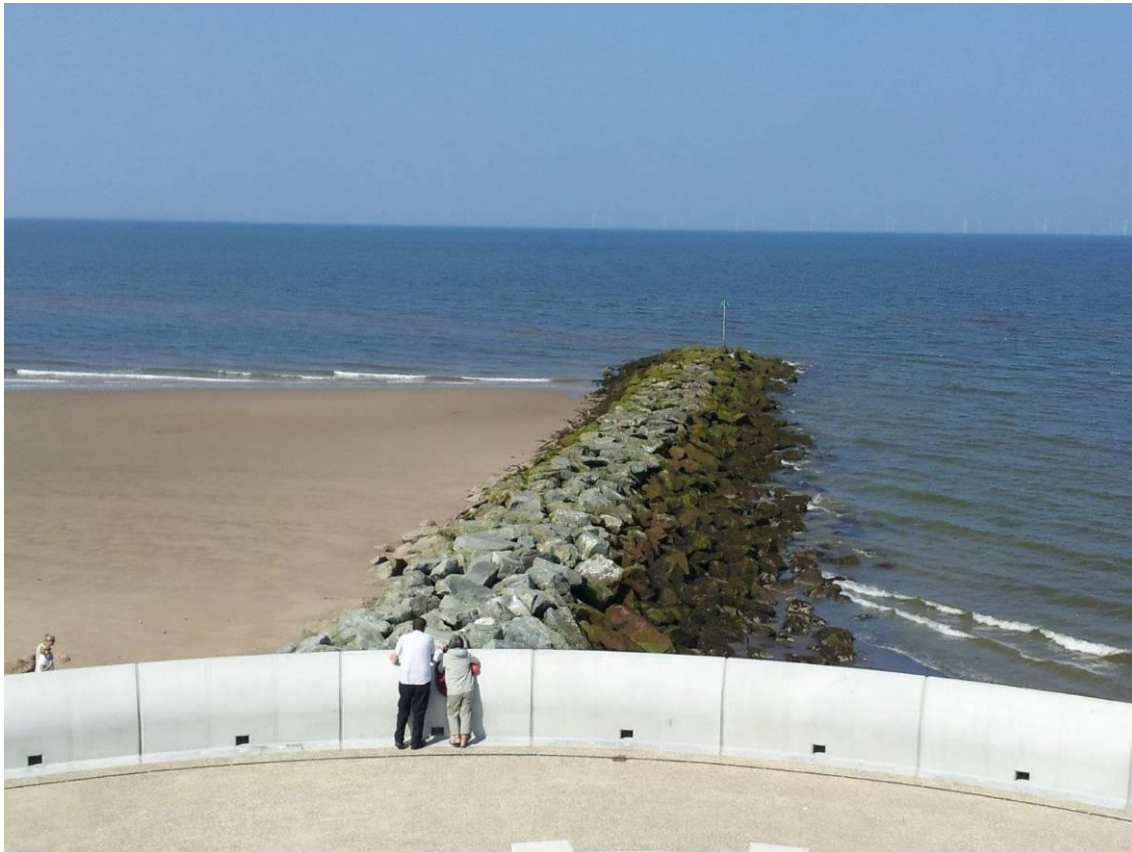
#### Local schemes/initiatives

- It is important to ensure sufficient funding can still be made available for smaller “quick win” schemes which may not always be in the highest risk areas but which provide immediate flood risk management benefits.
- The programme would assist councils in planning ahead, particularly with regard to larger value schemes. Concern that the programme would remove the ability for councils to carry out smaller scale grant funded schemes even if the benefit cost ratio is high.
- Although tackling flood risk at a national level, still need to make provision for flood risk at a local level.
- Any strategy developed should retain a facility for responsible agencies to implement and maintain localised initiatives by means of revenue funding in accordance with established flood risk management plans.

Other comments received in response to this consultation question included:

- Would like to see more consideration from Welsh Government of how to better address rural/urban divide.
- How is “success” measured or quantified? What happens if the programme is proved unsuccessful?
- Application, allocation and monitoring processes need to be appropriate and can evidence that investment from both public and other sources are maximised.
- FaCIP Programme should also include:
  - An assessment of agricultural land that reflects its contribution to the economy as part of the UK food chain, including such factors as food processing, import substitution and employment.
  - Specific targets for protecting farmland from excessive flooding and erosion.
  - The true value of rural areas, communities and infrastructure are taken into account.
  - Active management of flood events to reduce the severity of impact on farmland; for example, by reducing the duration and frequency of flooding over agricultural land

The one response that strongly disagreed with the proposals was from an inland local authority. Although the authority agreed that there was a need for streamlining the current system, it was felt that the flood and coastal investment elements should be split out. It was felt that the mechanisms of coastal flooding and erosion combined with fluvial and pluvial sources of flooding, would ultimately direct funding towards coastal regions.



**Figure 2: Colwyn Bay Coastal Scheme**

Question 2 - Do you have any comments on using the Programme for all aspects of flood and coastal erosion risk management in whatever way is most appropriate to address risk?

Most respondents provided comments to this question providing further clarity and information on how the programme could integrate all sources of flooding and coastal erosion risk management to appropriately address risk. The key areas of concern/comment under this consultation question were around the inclusion of coastal erosion within FaCIP, the need for local small scale schemes to be recognised and further comments on revenue funding.

On analysing the responses a number of the respondents felt that coastal erosion should be treated separately as it was identified that erosion and flooding are two very different challenges. However, there are linkages where coastal erosion and flooding interact with each other and should be considered as a sole indicator separately to the interactions of riverine and pluvial systems which are not affected by the changing of tides. The impacts of coastal erosion in Wales are varied ranging

from temporary impacts such as beach depletion to permanent loss of land and risk to properties through cliff erosion without causing a flood risk, therefore it was questioned how coastal erosion would fit in with FaCIP in the current proposal.

Concern was also raised of the potential to overestimate the risk towards coastal regions by combining coastal erosion and flooding risks whereas inland areas will only be affected by flooding. It was identified that it is important to ensure that inland local authorities without the coastal erosion concerns or significant flood plains do not feel aggrieved about receiving little or no funding. It was suggested that in areas where short-term coastal erosion can lead to flooding it seemed appropriate to consider this as part of the programme, however in more complex cases this must be assessed on a case-by-case basis. Coastal management groups should be included within discussions around how best to include coastal erosion in FaCIP.

A number of responses suggested a separate budget for coastal erosion with one proposal received suggesting that the FaCIP budget is top sliced and this money used separately for coastal erosion related work or to take forward SMP policies in areas highlighted at future risk with loss of properties or key infrastructure due to permanent loss of land.

One response suggested that with regard to coastal erosion, in the long-term, options such as compulsory purchase of land or manage retreat may be required and questioned whether this should also be included within FaCIP or whether the Welsh Government should have a separate programme to deal with permanent loss of land due to coastal erosion?

Points were also raised around the Flood Risk Index. It was identified that care needs to be taken when assessing national priorities against risk based on historical data as recent events have shown that flooding can occur in areas not previously deemed as being high risk. It was also identified that multiple sources of flood risk can create complex situations. The understanding of the interactions of different sources of flooding will involve collaborative working across RMAs. It was questioned how the programme would be used to prioritise between low frequency large consequence events and high frequency low impact events.

The use of local input and knowledge in developing the FaCIP programme has been identified as being important. The dissemination of data and pooling of knowledge at a local level would provide greater understanding of risk when identifying areas for initiatives. It was identified that factors used to score risk should include an element of local knowledge as this could help identify potentially low cost solutions to some problems and highlighted local issues that may not be identified by national scale mapping. Respondents also identified the need for grant funding to be available for small scale projects and individual property protection where major flood risk areas are not identified.

Similar to the response to question 1, funding issues were highlighted, particularly around revenue funding. It was suggested that in certain circumstances it may be more appropriate to allocate revenue funding to Lead Local Flood Authorities to manage, maintain and improve existing defences rather than request funding to develop a capital scheme. A question was also posed to Welsh Government about

whether funding post flood events to repair/replace damaged assets or to assist recovery would be provided within the new programme.

It was hoped that this programme would mean that all Risk Management Authorities including water companies will be able to access funds where appropriate in the future.

It was welcomed that this programme would look at all forms of flood risk management investment and not just focus on hard defences, although it was questions how the balance of investment between defences and other aspects such as flood resilience measures which may be more appropriate would be developed

Some of the other comments received in relation to this consultation question included:

- Beneficial to have clearly defined criteria which would include the protection of national infrastructure to ensure correct risk areas are provided with funding.
- How will this programme/index interface with existing arrangements within Shoreline Management Plans and other relevant plans, policies and programmes.
- Promote and encourage all RMAs to deliver schemes sympathetic to the surrounding environment and compliant with legislation (e.g. Water Framework Directive/Habitats Directive).
- Objectives broadly aimed at encouraging more natural land management of the river and its floodplain must be balanced with the landowners need to retain drainage capacity of the land, manage drainage infrastructure and produce food productively

### Question 3 - Do you have any comments on the proposal for a National Flood Risk Index to help understand risk from all sources?

The responses to the question asking for comments about a National Flood Risk Index were all generally supportive and welcoming of the development of such an index which would provide clarity and transparency in assessing and understanding risk. However there needs to be a process in place to provide a clear explanation of the criteria used for assessing risk and explain how/why an area scored what it did. This needs to be communicated in an appropriate way for the public to understand in order that decision making is supported at the community level.

Similar to responses received to the earlier questions, the issue of the use of local knowledge was identified as a common theme.

The use of local data is beneficial, particularly in terms of local risk and historical flooding. The National Flood Risk Index needs to be flexible enough to allocate funding based on local flood risk when it is considered better than national datasets and that local evidence can override national datasets where better evidence is available locally. The use of local data was included in the consultation and this was identified and supported by respondents. It was agreed that the index needs to be a starting point to help drive local conversations between partners based on nationally set and prioritised risk index

There was concern raised that smaller scale local schemes would be sidelined in favour of larger schemes of regional or national importance. The Flood Risk Index should not be a barrier to exclude smaller but viable local flood risk solutions from receiving funding and that this should not be the only funding tool available, for example, there needs to be some mechanism for ensuring funding is available to small schemes to address 1-10 houses flooded on a regular basis but are not in an area of high risk. One recommendation was for a Minor Works funding stream within FaCIP to be developed to provide an opportunity for individual property level protection or smaller schemes to progressed.

There were comments around the sources of flooding to be included within the Flood Risk Index. Numerous respondents felt that the risk from groundwater should be included within the Index at an early stage as can be a locally important issue and that flooding from groundwater is becoming an increasing risk to both properties and assets, however in contrast, at least one response agreed that groundwater flooding should be excluded from the Flood Risk Index initially.

There was also a suggestion that it may be appropriate to include sewer flooding records maintained by the sewerage undertakers into the source data to support the identification of collaborative schemes.

Some concerns were raised about the lack of good or comparable data on the flood risks associated with surface water and that further work is required to understand the complex nature and level of risk from surface water before it is integrated into the Index of Flood Risk. There were suggestions put forward that risk could be based on 1 in 30, 100 (200 for coastal) and 1000 for fluvial flooding and 1 in 10, 5 and 1 for surface water flood risk.

Similar to the first two questions, there were concerns raised about the inclusion of coastal erosion and the potential to distort the Flood Risk Index towards coastal regions by assessing two factors together therefore disadvantaging inland authorities and rural areas with lower population densities, likely to be lower down on the National Flood Risk Index despite potentially more frequent flooding.

A number of respondents identified that there are already methodologies in place in the form of the Communities at Risk Register and for Flood Risk Management Plans and that there is a fear that the Flood Risk Index will simply be an extension/expansion of these tools creating additional burden for local authorities and duplication of work, however the current prioritisation tool is unlikely to be an objective assessment of all sources of flood risk. In addition a key deliverable for the Wales Coastal Monitoring Centre was the creation of a matrix defining risk across Wales

Some of the respondents identified that the planning system should be taken into account in this programme which included questions around whether the planning process and the TAN guidance for local authorities should be considered as part of the programme which are intended to reduce risk in Wales and the inclusion of proposed development that have been identified within the Local Development Plans.

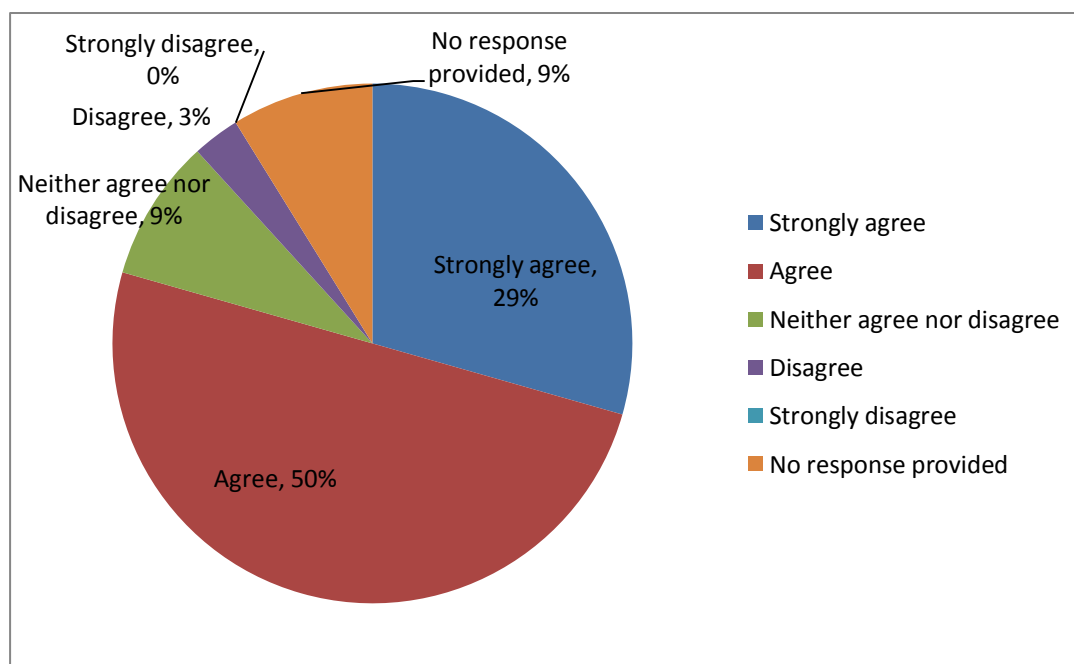
In creating a National Flood Risk Index, the data to be input needs to be rigorous and accurate and the process flexible enough to be periodically updated as new and better information becomes available. It was questioned whether the use of Lower Super Output Areas as building blocks for the index is suitable due to the variability between areas.

It was suggested that the Flood Risk Index should have some consideration of the impacts on critical infrastructure and economic losses including commercial properties and agricultural land for food productivity as well as risk to life and residential properties. One respondent suggested that there should be consideration for communities that whilst may not be at flood risk can be adversely affected by flooding, for example main roads being cut, therefore isolating communities which can have a significant social and economic impact.

Other comments put forward under this question included:

- Concerns around the implications for home insurance where specific properties are not liable to flooding but are within a wider 'at risk' area.
- Existing flood defences should be taken into account and where this information is not available this should be done as a priority
- Concerns ahead of the forthcoming Innovative Finance Programme and the possible differences in criteria assessing potential schemes.
- Lack of accurate data on the extent of the loss of agricultural land prevents an accurate and comprehensive determination of the full consequences in the risk analysis process.

Question 4 - Do you agree that a Flood Risk Index should remain a high level indicator of combined risk but allow local flood modelling to be used to support evidence in applications?



**Figure 3:** Responses to question 4 that the Flood Risk Index should remain a high level indicator of combined risk but allow local flood modelling

28 consultees provided an agree/disagree response to the question posed on whether the Flood Risk Index should remain a high level indicator of combined risk whilst also allowing for local flood modelling to support applications. Of those providing a response, 27 agreed or strongly agreed with this statement whilst 1 respondent disagreed.

The general agreement was that where local modelling and knowledge was available it is vital that this is used in the application assessment process. Best available data needs to be used in the decision making process to provide greater accuracy of risk and a greater capacity to predict the cost of risk reduction. The use of local data and modelling will provide real time data and is likely to encourage local buy-in to the overall programme and help to assess alternative actions to manage risk such as individual property defences, improved warnings and resilience. Local knowledge can also provide information about the location and condition of existing defences. The index requires consistency at an all Wales level to enable locations at risk to be considered on a like for like basis. Local modelling and analysis will be required to ensure that local risk is fully understood and to support the evaluation of risk management options in accordance with the nationally consistent appraisal guidance. The issue of assessing schemes that are only impacted by one source of flood risk was identified as an example of where local knowledge is important.

The provision of historical flooding data is also useful to support applications particularly where it proves more cost effective than the production of additional flood modelling

In addition to local data, local knowledge and anecdotal evidence is held by farmers and other land managers of flooding hot spots and management practices which it was suggested should be fed into the datasets and decision making processes. The people managing the land have an intimate knowledge of flooding patterns, flood peaks and flows and are in possession of a knowledge built on many years experience.

Although there was much agreement on the use of local flood modelling, a number of concerns/questions were raised:

- Extra modelling would increase the cost of the PAR, lengthen the life of the project, slow down the application process and create extra work for LLFAs, this is particularly significant for the smaller schemes.
- Clarification needed on how funding for local flood modelling would be obtained.
- More detailed work needs to be undertaken to assess risks accurately where local knowledge indicates higher risk than the Flood Risk Index shows
- Clarity needed regarding the criteria that would be considered when assessing the local evidence provided in support of an application.
- The impacts of flooding on residential properties is immediately apparent, however the long term effect of the loss of a key industrial site could have far greater impact on a community.
- If areas shown on the mapping as Maximum Natural Risk without adjustments such as existing defences and local data on frequency of flooding, it is likely to undermine public confidence in the mapping
- Would the mapping for the Flood Risk Index showing the Maximum Natural Risk areas be used to discourage development?



- Local knowledge and historic flooding evidence does not take into account changes such as sea level rise, rainfall patterns and increased extreme events. It was questioned how this would be considered in the production of the index
- The new index would require RMAs to firstly justify their proposal through the usual manner i.e. cost benefit, multiple benefit but could also require the authority to disprove the national index which increases the time, and cost for any proposal.

The respondent that disagreed with the use of the Flood Risk Index as high level indicator along with local flood modelling to support applications suggested that the detail in respect of how the index is to be developed and used should be declared with detail addressing the concerns that initiatives and projects may become confined to large scale programmes at the expense of smaller but more cost effective measures. In addition it was stated that high level indicators for flood risk based on NRW and Welsh Government data and mapping systems should be utilised questioning whether there was a need for another database unless it is benefiting from enhanced datasets and supported by robust technical data and knowledge. It was also identified that in the current proposed Flood Risk Index there is an absence of reference to Development Advice Maps (DAMs) and a need to clarify how they will be considered/used. The DAMs inform the consideration of planning applications and the statutory development plan; this has implications on the distribution of growth across a 15 year period.



**Figure 4: Flood alleviation works, Rhiwbina, Cardiff**



**Figure 5: Lower Swansea Valley Flood Alleviation Scheme (Photo courtesy of NRW)**



Question 5 - Do you have examples where flooding has repeatedly occurred in a place currently shown as a low flood risk?

Yes	4
No	15
Not sure	5
No response provided	10

Only 4 respondents to this question returned a positive response to the question of whether they had any examples of places seeing repeated flooding that are currently shown as a low flood risk. 15 respondents had not seen such flooding whilst a further 15 were either unsure or provided no response.

Two local authorities provided examples of such locations.

Examples provided by Monmouthshire council:

- Tintern can be flooded from tidal flooding several times in one year, it is also a mix of commercial and residential properties, as well as having a significant infrastructure concern being the main route to settlements in this part of the Wye valley, yet to date it has not met a cost benefit threshold to warrant any defences.
- The Caldicot Levels have a low density of residential properties with substantial areas of agricultural land, much of it SSSI's or similar designations. Flooding from the sea here would generally be a low priority in terms of the National Index approach as the numbers affected are low and agricultural land values are low. However, flooding here would be catastrophic to the Welsh economy because of the impact on infrastructure. Flooding would affect the M4 and the main South Wales to London railway probably causing their closure, including the Severn Tunnel. Power & gas supplies and telecommunications would also likely be out of action and this is the main infrastructure routes of these services serving South Wales. This has national significance but would probably have a low count on the National Index.

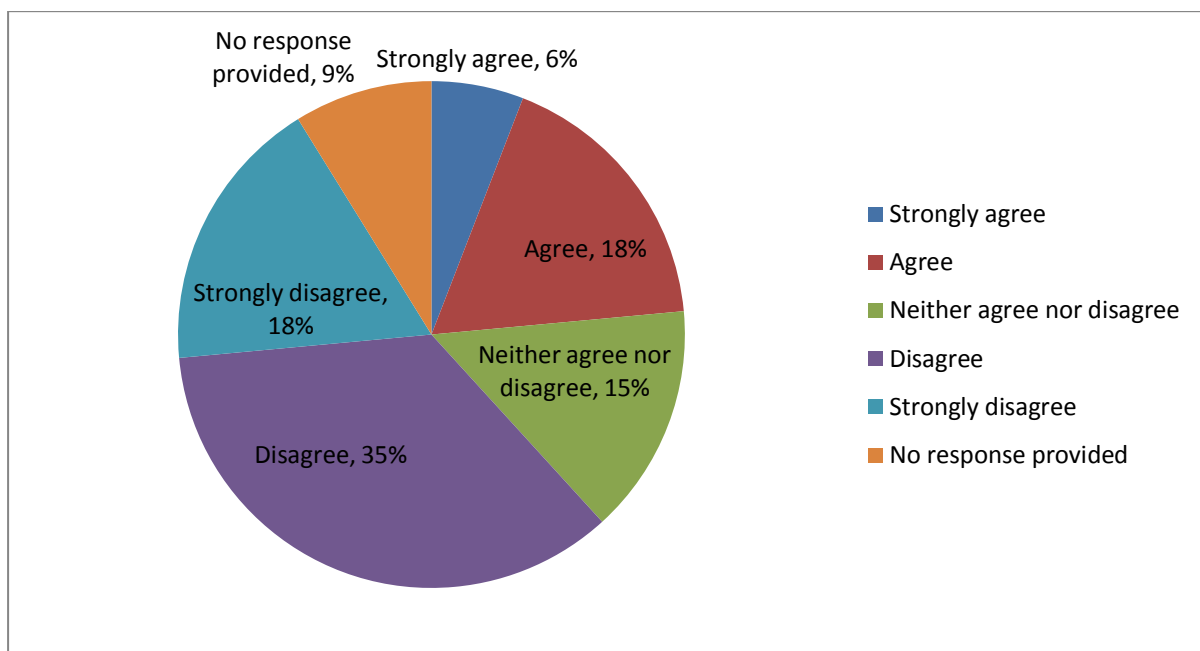
Further comments received in response to this question included:

- Lack of understanding that some areas are designated to flood at low risk to better manage regional flood risk, however sometimes this decision is taken forward without consultation with stakeholders
- Several locations exist where individual property is affected by surface water run off but is not shown at risk on the current mapping
- Examples of flooding occurring in a locality with defences in place which had been represented in flood modelling, but which subsequently failed during a flood event
- Area of Lower Cardigan listed at 200 on the Communities at Risk Register but flooded three times since October 2012. Fear an area such as this may be missed by a Flood Risk Index which provides a high level indicator of combined risk
- Aware of issues where land is flooded and can remain inundated for significant periods of time. Concern that the National Index of Flood Risk would not adequately recognise or prioritise these areas. There should not be an assumption that agricultural land can simply be sacrificed for flood storage
- In addition to flooding, aware of land loss due to river bank erosion

- Relatively new areas of frequent flooding can occur when either an existing drainage system becomes blocked or where a new development has created unanticipated problems

Question 6 - Do you agree that information relating to defences should be excluded from the Flood Risk Index?

Strongly agree	2
Agree	6
Neither agree nor disagree	5
Disagree	12
Strongly disagree	6
No response provided	3



**Figure 6:** Responses to question 6 relating to the exclusion of defences from the Flood Risk Index

With regards to the question relating to the exclusion of defences with the Flood Risk Index, 18 respondents disagreed or strongly disagreed with excluding defences in the Flood Risk Index whilst only 8 agreed or strongly agreed. The remaining 8 either provided no response or a 'neither agree nor disagree' response.

Many of the respondents who disagreed with this question felt that data on defences should be included within the initial Flood Risk Index and that this should include not just the location of the defences but their condition, residual life and vulnerability be included. It was also suggested that their continued maintenance is recorded along with highlighting any defences proposed to be abandoned. Including such data will allow a more informed evaluation of risk and priorities at a national and local level. If this Index is to be made public, in excluding defences the public are likely to have an unrealistic impression of the risks they face. They are also unlikely to understand

the reasoning behind leaving existing defences out of the model. If this is to be a public document, the public will want to see where and what work is taking place. The condition of the defences should be an important part of the formula for determining risk. It was suggested that as the condition deteriorates over time or is damaged then that element of the formula should be updated to reflect the increased risk, when the defence is upgraded then the reduced risk will be reflected in the index

There was much concern that the exclusion of flood and coastal defence data from the Flood Risk Index could target investment towards areas already benefitting from adequate and well maintained defences and avoid the areas continually being shown as high risk communities and possibly attracting large parts of funding irrespective of the fact that there are existing defences in place. The objective of investments is to deliver a reduced risk of flooding to communities, completed schemes will therefore lower the risk. Without this information included the index will become static and the highest risk communities could remain at the top despite adequate investment already being in place.

It was questioned by one respondent how funding would be allocated under the programme if areas of high risk remain on the Index once preventative works have been undertaken. In terms of the Flood Risk Index, it was suggested that an area protected through regular minor maintenance works should be afforded a higher priority than an area with recently constructed defences which will not require further funding in the short term.

In areas where schemes are implemented there will always be a residual risk to vulnerable properties and this approach could potentially deliver funding to areas where there the higher need is for awareness raising.

One suggestion put forward was that the presence of existing defences be given a separate score in the development of the National Flood Risk Index, similar to the proposed way of dealing with coastal erosion

It was identified by a number of responses that the current information held on defences needs to be collated as a matter of urgency in order to avoid areas which are not at risk from flooding due to adequate and well maintained defences being given a higher risk than appropriate. Including this information at a later stage slows down the funding process. It was noted that all Lead Local Flood Authorities have a duty to Maintain a Register under Section 21 of the Flood and Water Management Act 2010 and therefore the necessary information should be available in time. However there was concern raised that the approach to developing these records and registers of defences may not be uniform across all LLFAs making capturing key data consistently a difficult task.

There were a couple of comments from consultees around the fact that defence data is included within Development Advice Maps, TAN15 and other information in the public domain and therefore for consistency with other Welsh Government policy and mapping they should be included here.

It was noted however that whilst the presence of flood defences is important information, the implications of climate change projections may have a bearing on their ongoing effectiveness and the need for future investment.

Of the of respondents who agreed that the information relating to defences should be excluded from the Flood Risk Index most agreed that this information was important at a local level however and should be used as such to inform appraisals. It was widely agreed that it is not appropriate at the moment to include such data as there is an absence of a nationally consistent dataset on location and condition of current defences, however when this information is available it may be appropriate to include. These respondents agreed that a map of the current flood defences and their condition is essential which should be completed as soon as reliable data becomes available.

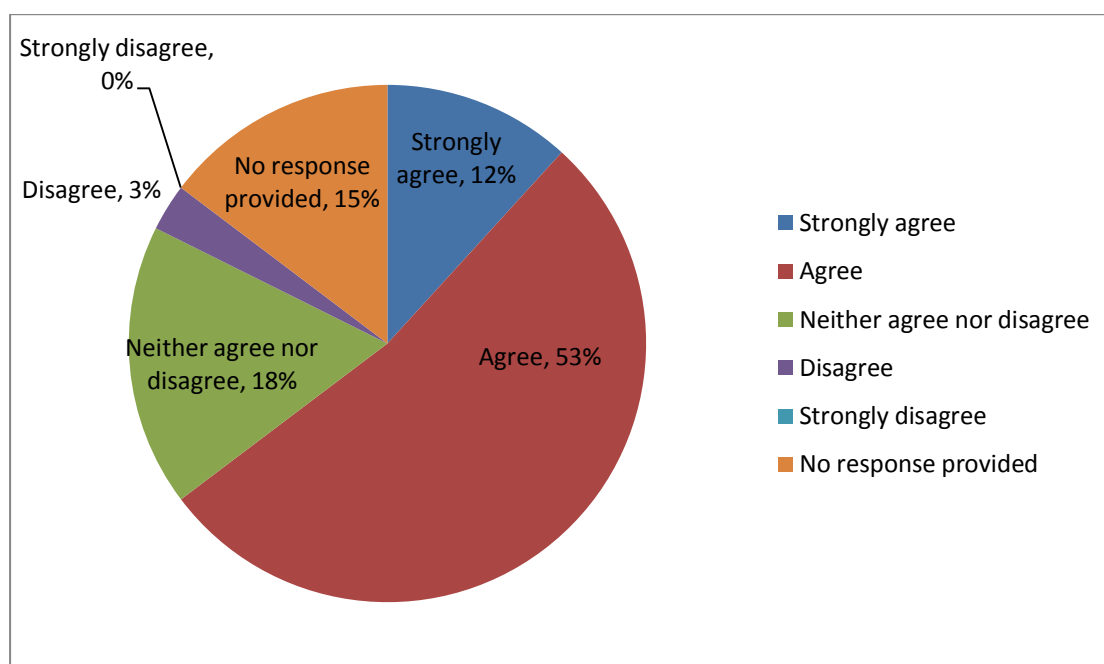
It was identified by one respondent that whilst excluding existing defences seemed sensible it does however raises the question as to the sudden failure of a defence in a flood/coastal event.

There was concern raised that there is unlikely to be consistent level of detail in terms of surface water flooding defences.

If information regarding defences is to be excluded within the Flood Risk Index, when this is made public it needs to be accompanied by clear messages to explain that it does not represent the actual or true present day risk.

Question 7 - Do you agree with the approach to Coastal Erosion risk and that it should be marked separately to flood risk?

Strongly agree	4
Agree	18
Neither agree nor disagree	6
Disagree	1
Strongly disagree	0
No response provided	5



**Figure 7:** Responses to question 7 regarding the proposed approach to Coastal Erosion risk and that it should be marked separately to flood risk

65% of the responses (22) either agreed or strongly agreed coastal erosion risk and that it should be marked separately to flood risk. Only 3% (1 respondent) disagreed with this statement

Respondents commented on how these are separate processes with different impacts which can be permanent and irreversible (e.g. cliff falls) in the case of coastal erosion or temporary in the case of flooding, they can both occur simultaneously or separately. The number of properties affected by coastal erosion processes may be lower than those affected by flooding but the impacts are more permanent. In some cases properties identified as being at risk from coastal erosion may never be at risk from flooding. It was suggested that there needs to be clarification between gradual coastal erosion that may be reversible and more permanent erosion in the form of loss of land. On occasions flooding is caused by a combination of the actions of sea, river and infrastructure, and a separate index for each source would give a better understanding of what is happening on the ground. It was highlighted in one response that although the two processes should be shown separately coastal erosion will need to be a significant consideration in the Index as erosion of the foreshore will increase the impact of waves and potentially undermine any existing defences in place.

Similar to responses received to earlier questions, there was concern raised that including coastal erosion could distort and overestimate risk towards coastal regions, thereby disadvantaging inland LLFAs, suggestion of a separate budget to deal with coastal erosion.

Concern was raised about whether current mapping of coastal erosion was accurate enough to provide valid data. Coastal erosion is a subtle process and can only be measured by coastal monitoring over a prolonged period of time to establish long term trends. These trends will flag up where land is likely to be lost in the future. It was identified that our understanding of coastal erosion risk in Wales is limited and needs further work. Our understanding of coastal erosion risk is informed by the National Coastal Erosion Risk Management (NCERM) project which is a relatively new and immature dataset. This data is high level and not always accurate. It was highlighted in responses that NCERM does not consider coastal erosion where there is considered to be a flood risk, therefore it will need to be marked separately. As there are likely to be areas where both coastal erosion and flood risk is an issue, any meaningful prioritisation of coastal erosion is not likely to be possible with the current data. Land at risk from both erosion and flooding is at greater risk due to the consequences of both; however this is not included within either NCERM or National Flood Risk Assessment. It was suggested that further mapping and modelling of coastal erosion risk was required and that NCERM should inform such work to improve our national coastal erosion datasets. Any such research should take into the impact of climate change on erosion rates. A number of respondents also made reference to Shoreline Management Plans and the suggestion that there should be more use of monitoring data and data collated within the production of SMPs. Interventions to control, manage or adapt to coastal erosion should be aligned with the strategic direction of travel set out within Shoreline Management Plans.

A couple of responses made reference to the loss of agricultural land through coastal erosion which it was felt needed to be included within the Flood Risk Index. Within Wales productive agricultural land is a finite resource and when cliffs retreat through coastal erosion this has a permanent and detrimental effect on livelihoods and on economic output, including on food production. The full extent of losses of agricultural land as a result of coastal erosion may not be fully understood and therefore not valued within the Flood Risk Index.

A suggestion was put forward for consideration that proposals for interventions to manage coastal flood risk should give consideration to the local coastal erosion risk and vice versa.

The respondents that disagreed with this proposal to mark coastal erosion separately identified that areas with a strong possibility of a combined risk from both the sea and fluvial flooding should be given an extra higher designation and weighting.

Other responses with some degree of disagreement of marking coastal erosion risk separately commented that in areas where short term and rapid coastal erosion could lead to flooding, potentially through the failure of existing hard defences, this risk should be reflected within the Flood Risk Index as the risk of coastal erosion could be directly relevant to the flood risk. This would allow for decisions to be made as to whether preventing coastal erosion can reduce the risk of flooding. One suggestion put forward was that there should be scope for integration of a joint assessment in certain geographic areas such as estuaries, but generally coastal erosion should be treated separately.

Question 8 - Do you agree with the principles set out on assessing risk from multiple sources and scoring by Lower Super Output Areas?

Strongly agree	2
Agree	15
Neither agree nor disagree	5
Disagree	5
Strongly disagree	4
No response provided	3

Of the respondents providing an agree/disagree response to this consultation question, 50% agreed or strongly agreed that Lower Super Output Areas were the most appropriate spacial units in which to assess risk from multiple sources of flooding. 9 respondents (28% of those providing a response) disagreed with this and of those, 4 strongly disagreed within the use of Lower Super Output Areas (LSOA).

Of the respondents who agreed with the proposal to use LSOAs as the basis for scoring flood risk supporting comments included:

- Working within LSOAs will give greater flexibility in the longer term to develop and modify the Flood Risk Index by taking into account local development.
- People and property are the priority with a highest weighting for those who are socially and economically disadvantaged.

- Needs to be regular reassessment of all LSOAs taking into account development, registered flooding events or the consequences of extreme flood events.
- Although risk to life remains priority, potential interventions should be evaluated against the wider social, environmental and economic criteria and consideration given to the Wales Coastal Habitat Creation programme.

Although there was much agreement to this proposal, a number of comments and concerns were put forward. Some of the main issues were around dealing with cross-boundary issues where the impacts of flood risk areas straddle LSOA boundaries and whether the use of LSOAs was appropriate given their size and differences between rural and urban areas. Comments included:

- May not show smaller areas of high risk within a wider area. This is particularly pertinent where there is a narrow coastal strip backed by steeply rising ground, a common feature around the Welsh coastline. In rural areas they may exclude whole villages at high risk within a wider areas of no or small risk
- A linear corridor of flooding throughout a catchment crossing multiple LSOAs, could affect the same number of properties as a more discrete area entirely contained within a single LSOA, however a more discrete area of flooding could score more highly than the aggregated LSOAs.
- LSOAs are too large to enable consistent assessment of flooding from all sources of flood risk. Assessment based on such a large area will be weighted towards flooding from main rivers and the sea and will therefore not allow objective assessment of local flooding sources affecting less than 50 properties but at a more regular risk from flooding.
- LSOAs have a minimum of 400 households – use of this will exclude smaller rural communities which may be at very high risk. There needs to be a mechanism for identifying such small pockets as well as large areas of risk
- LSOAs do not consider land use/catchments etc. The Communities at Risk Register has been divided into more manageable areas. SMP2 has divided welsh coastline into management units. These alternatives should be looked at and a reason given for not adopting.
- The use of LSOAs is questionable due to the variability between areas. A sparsely populated rural LSOA of 1500 homes is likely to cover a larger area of land mass, possibly extending to more that one catchment area and differing flood risks. This could lead to houses having the same score, but in reality a different exposure to flood risk and/or coastal erosion.
- Large towns may have numerous LSOAs which relate to the same source of flooding potentially prioritising funding multiple times.

Similar to responses to some of the other questions, there was concern from landlocked communities that prioritisation would be skewed towards LSOAs with a coastline

Whilst the majority of respondents agreed with the use of LSOAs, it was identified that there was a array of information already available that could be used within FaCIP which could be used for streamlining the ranking system and address the highest risk areas including preliminary flood risk assessments, Local Flood Risk Management Strategies and Flood Risk Management Plans.

One concern was raised regarding whether the use of LSOA, may not be the most appropriate scale in terms of communication with the public or for driving forward local discussion between risk management partners with a suggestion that as FaCIP is developed, alternative spacial areas could be tested for certain activities including public communication.

The suggestion to invite infrastructure owners to contribute information about the vulnerability of their assets was received positively and was suggested that this could be extended to include the emergency services and vulnerable industrial developments (e.g. chemical plants, incinerators, waste disposal sites).

A number of suggestions were also put forward to include national infrastructure such as roads, railways and pylons within the Flood Risk Index with an appropriate weighting applied to each of the additional infrastructure elements. Whilst risk to human life is the highest priority, it was identified that there also needs to be consideration to protect services essential to life such as drinking water supplies and as such these should be given a higher weighting. Any loss of essential infrastructure could threaten the well being of thousands of people. Alongside the risk to life, flooding can cause people to be trapped in cars/trains in flooded areas, loss of telecommunications/power and issues for rescue and emergency services. It was also highlighted the importance of protecting the integrity of dams and the populations downstream should also be prioritised.

From respondents that disagreed with this proposal, it was questioned whether LSOA was an appropriate scale and other suggestions included an initial catchment based approach to allow consistency with the Water Framework Directive and Environment Bill or a community scale. It was noted that the use of LSOAs does not correspond to any scales commonly used in Wales for flood risk management activities where NRW use a catchment scale and local authorities use a community or ward scale.

In terms of grouping LSOAs there was concern that grouping like areas together based on individual area scores could label those areas as potential hotspots and have repercussions on insurance costs and property values

It was acknowledged by responses that whatever approach is taken, there needs to be some degree of review against local knowledge may be needed.

#### Question 9 - Do you have any further comments on the presentation or development of the proposed Flood Risk Index?

Responses to this question highlighted that further clarification was required in the following areas:

- Who is going to develop, manage and update the Flood Risk Index. As more data becomes available, scores should be able to more accurately prioritise risk.
- How areas will be grouped particularly if they are adjacent - concerns that it may be difficult to get parties together where there is a low result, yet a significant risk.
- What affect will the coastal erosion scoring have on the flood risk index for coastal areas.



- How or will flood risk from reservoirs is being dealt with
- How the flood index maps will relate to other sources which may not be captured as part of its methodology
- How policy implications at a national and local level would impact on future investments and respective prioritisation.
- Is there enough funding to develop/progress the top 5% or 30 areas and if not how they will be prioritised within those groups.

Similar to previous responses, there was again concern highlighted around the inclusion of coastal erosion and in some cases coastal flooding within the Flood Risk Index, particularly from the landlocked authorities who felt this would heavily distort and overestimate risk towards coastal regions. It was also commented that combining fluvial, surface and coastal flooding has issues due to the combination of various probabilistic scenarios and the impacts between various hazard types.

In creating the Flood Risk Index, it was identified that there needs to be greater collaboration and data sharing between the various agencies to identify risk and deliver solutions, this should therefore see Risk Management Authorities involved in the production of the Index. There was also a suggestion of including expertise from landowners in the process who can identify local flood risk areas and measures to mitigate the consequences of flood events including land management issues which help reduce flood risk of communities down catchment. LLFAs will identify their own high risk areas through their local strategies and therefore the Flood Risk Index needs to be consistent with these.

A number of comments and concerns were put forward with regards to the Flood Risk Index and how it is seen by the public. The public need to be made aware of the assumptions and limitations within the datasets. Any Flood Risk Index available to the public needs to be clearly communicated and allow the public to be confident of the consistency of the information and able to challenge the risk scores. It should also allow communities to understand what activities are already in place to manage risks present. The presentation of the Flood Risk Index also provides an opportunity to raise local awareness of issues and increase interest in local flood risks.

Again, comments were made on including defences within the Flood Risk Index with a suggestion that areas proposed as being classed as high risk are overlain with the protection level from existing defences to show the areas at “actual risk”. In doing so a standard inspection procedure of defences would need to be put in place to classify the current standard of defences. Concern was raised that there is no justification in labelling areas as the “most at risk in Wales” as the intention of the index is to identify a ranking of the “maximum natural risk”.

#### Question 10. Do you have any comments or suggestions on the application process?

A number of the responses suggested that further clarification was required on the applications process to address:

- Definition of the terms:
  - “greatest risk”– is this in terms of scale (properties affected) or in terms of return period for risk

- “national priority” - does this prioritise internal flooding of property, will it include essential rail and transport links?
- “low cost intervention”
- Clarity regarding financial commitment that Welsh Government will make towards a scheme before the application process commences, for example grant rates for particular schemes and whether grant would be available over a longer period
- How will challenges to the Flood Risk Index ranking be funded? Is there a process for appeals?
- How will further investigation of flood risk be funded?
- Greater flexibility and funding period for a scheme that may take several years to deliver
- How coastal monitoring programmes will be dealt with?
- Regular updating of Flood Risk Index is required, but what does this mean in practice.
- Who will be the lead where schemes are addressing flooding from multiple sources?
- What is the threshold for low costs schemes? What is the cut off between high and low national priority areas?
- What will happen if a local authority cannot provide the support funding for a high priority project?

A national funding and allocation timetable will improve planning and programming in flood risk management in Wales. Whilst generally welcomed, a number of concerns were raised about the proposed application process being too complicated and bureaucratic and a simpler process needs to be considered, especially around the cost benefit analysis formula. There was concern raised around the requirement for separate applications for modelling, feasibility reports, PARs, design development and construction which would create a long process and mean that urgent schemes cannot be brought forward within the appropriate timescales.

A number of responses highlighted the importance of the application process being flexible enough to proactively call for additional applications should this be required or if additional funding becomes available. It will also need flexibility to respond rapidly to post event applications for urgent works and respond to unforeseen delays. It was identified that there may be difficulties encountered tying in with local authority capital programmes therefore the application process will need flexibility in the funding over differing financial years.

Concern was highlighted that the annual timeframe could lead to inefficiencies in both the supply chain and the determination of applications (6 months for bid determination seemed excessive). It was recommended that a minimum of two cycles annually was more appropriate.

It was also noted that the timetable requires sufficient time between the point of allocation of budget and commencement of works and expenditure (e.g. for procurement and mobilisation of project design and construction terms)

It was recommended that Risk Management Authorities should be involved in the application process and timetable and a suggestion was put forward that national infrastructure organisations may wish to comment on the applications.

Other comments for consideration provided in response to this question include:

- Applications for funding need to be technically scrutinised and evaluated on an equal basis by officers with the required technical expertise and experience.
- Revenue needs to be considered alongside capital for LLFAs to access revenue funding to develop schemes.
- Cost/benefit analysis should include alternative or non-capital actions that could be taken to mitigate risk.
- Consider potential contribution of the agricultural community and engagement of farmers in the programme and demonstrating innovative interventions to the application process
- Concern that areas falling into the lower rankings will not get funding to demonstrate where the Flood Risk Index is incorrect due to the exclusion of infrastructure. Presumption of funding to high risk areas, many of which have defences already in place, therefore discriminating against the low ranking areas with no defences
- Tourism should have a higher profile including coastal access and connectivity between coastal villages.
- Concern around maintenance of main rivers and coastal embankments, resources need to be prioritised for maintenance. FaCIP should set an objective to ensure robust revenue maintenance programme exists
- The programme should include linking in to policies and proposals of the adopted development plans along with the National Development Frameworks and Strategic Development Plans emerging through the Planning Bill.



**Figure 8: Coastal storm damage to Aberystwyth sea front, January 2014**

Question 11 - Do you have any comments or suggestions on the programme board or governance of a Flood and Coast Investment Programme?

Respondents agreed that a Programme Board was essential in bringing together a multi-agency group to provide a transparent way of assessing applications. This will be particularly important given the likelihood of oversubscription to the programme in

the early stages. Governance must have democratic input, be transparent and accountable and provide clear and consistent explanations for decision making.

A number of suggestions were put forward stating that existing governance arrangements that are already in place in Wales should be taken into consideration and that the governance of the Programme Board would benefit from incorporating the expertise and protocols of established bodies such as Flood Risk Management Wales Committee and WEFO Board. FRMW already has experience in dealing with the NRW capital programme. It was suggested that the Board could take on some of the responsibilities of FRMW's work and in doing so Welsh Government would need to consider the future role of FRMW. There needs to be careful consideration as to how the FaCIP Programme Board would operate alongside established governance arrangements and financial schemes of delegation within each RMA.

Suggestions were put forward in respondents providing additional people and organisations that could be included on the Board:

- Agricultural sector including farmers/landowners
- Severn Trent Water (who cover large parts of north Powys)
- Independent representatives from the sector (for example experts, academics, private/consultancy sector).
- Farmers unions
- Public
- Politicians
- Strategic infrastructure owners and landowners (particularly in respect to assessment of multiple benefits that may be derived from proposals)
- Affected stakeholders

There was general agreement that technical experience will be required on the Board to assess potential schemes and that Board members should have a broad understanding of environmental issues and sustainable development in order to make possible links and ensure multiple benefits. It was also suggested that the Board should take Dŵr Cymru Welsh Water's Asset Management Programme into account to promote potential collaboration between the two funding sources.

It was acknowledged that whilst all local authorities cannot be represented on the board; it was suggested that local authority representation to that presently on the Flood Risk Management Wales Committee would be appropriate. The Board should represent all Risk Management Authorities in a balanced way and provide a range of skills covering coastal, fluvial and land drainage experience.

In terms of the role of the board, suggested responsibilities included:

- Receive, scrutinise and approve applications for funding
- Ensure applications are delivering the required outcomes
- Agree corrective responses to ensure national financial targets are met and outcomes achieved
- Receive reports on progress and report this to Welsh Government
- Provide leadership and direction on nationally important initiatives
- Promote sharing of best practice.

It was also suggested that the Board could also promote areas thought to be in need of a priority scheme, this could be relevant where there is no clear lead party to take a scheme forward.

It was recommended that the board meets quarterly with monthly progress reporting. On top of this there should be an annual report by the Board on its activities including a review of actual/planned investment, an update of the Flood Risk Index and overall flood risk in Wales.

One respondent questioned whether if the board queries some aspect of an application will the response have to wait 3 months to be considered at the next meeting or could some aspect of the application process be delegated to officers if the principal has been agreed by the board?

Another response was that it was not appropriate to continue with the current board and suggested that a new board is formed with qualified and practicing engineers (rotating engineers from local authorities) and industry along with Welsh Government representatives to advise on strategy. As the risk index is a new strategy, felt it is not appropriate to continue with the current board.

It was also suggested that a further consultation may be required focussing on the remit of the board and the composition.

#### Question 12 - Do you have any other comments that you would like to put forward?

When asked for further comments in relation to the proposals put forward in this consultation document the majority of comments were around funding issues, particular around the uncertainty of future revenue funding for local authorities. With shrinking local authority capital budgets and uncertainty around long term revenue there is concern about a shortfall in local authority funding and the knock on impacts of this. Concerns were raised about how this would jeopardise maintenance work, preparing business cases, flood monitoring, awareness and resilience work, delivery of small low costs schemes, long term planning and retention of skilled staff. There was also concern on the impact this shortfall may have on the ability of local authorities to provide match funding for schemes. It was suggested that a Minor Works programme is included within FaCIP to consider small scale schemes and also funding made available for local authorities to further investigate flood risk in their areas. Again it was suggested that revenue funding is included from the start of the programme.

It was highlighted that flexibility in funding would be required to be able to cope with uncertainties around delivery risks and costs increase/decreases. This flexibility is also needed on approved spending to assist with certain time constraints (e.g. fish spawning/bird nesting season) which do not coincide with arbitrary financial year deadlines. A period of 2 or 3 years to spend funding would allow schemes to proceed in the most economic and environmentally appropriate manner.

It was identified that the current procedure for grant applications makes it off-putting for private landowners to apply for grant funding in areas where private assets are contributing to flood risk. FaCIP could provide an opportunity to make this process more straightforward. It would also encourage the roll out of the Sustainable

Drainage Systems (SuDS) approach if local authorities, sewerage undertakers and/or developers were able to access FaCIP funding for their ongoing maintenance.

A number of comments were put forward regarding the consideration of agricultural land within FaCIP and the importance of protecting land for food production and the economic benefits inherent in the agricultural sector. It was also identified that farmers and landowners could be well placed to carry out works at a much lower cost than NRW and therefore can achieve more with less. It was suggested that NRW and local flood risk authorities should support householders and businesses who want to undertake maintenance themselves and empower them to work with local communities to develop local solutions.

Concern was again raised about the combining of coastal erosion and flood risk into one index and how this would impact on inland local authorities. One proposal put forward was for FaCIP to be made up of two investment programmes, one focussing on coastal flooding and erosion and one for riverine and surface water flood risk.

In moving forward with the development of FaCIP a number of suggestions/questions were put forward for consideration including:

- Useful if RMAs saw a draft index before it is finalised to allow for areas of adequate defences to be identified and areas where more investigation is required.
- Development of FaCIP needs to be done in a planned and managed way to ensure that RMAs understand how FaCIP will operate and the requirements on them. This is likely to require the production of guidance and a communications plan.
- FaCIP needs to accommodate historic near miss areas that would not be part of a dataset but should be considered.
- If the board is to meet quarterly, how does this tie into the proposed timetable where bids can only be made at one point in the year.
- Further clarification is required on:
  - What is the programme/timetable for delivery of all required elements (guidance, grant rates, application procedures)
  - How will the board be appointed
  - How investment in community engagement, awareness raising and modelling work will be funded
  - Local authority grant rates should be simplified and rationalised as much as possible
  - Guidance on how FaCIP will consider local financial contributions, partnership bids and the impact on prioritisation and allocation
  - Guidance required to explain how FaCIP will consider post incident works

Other comments received included:

- All potential spend through FaCIP should consider a full list of potential wider benefits including social, economic, ecological and health.
- Flood risk to people due to planning decisions or overriding of NRW's advice also needs to be considered separately to this work
- Shoreline Management Plans and River Basin Management Plans have low profile in the consultation paper; these are highly relevant for consideration.

- A full local community consultation exercise should run parallel with all projects to enable greater input on the design elements and gain greater support from the public.
- First priority is risk to life, however there is no prioritisation/weighting for buildings such as schools, hospitals and surgeries
- FaCIP provides an opportunity for effective and innovative ways to use funding interventions to realise long term flood and coastal risk management outcomes and would assist in facilitating the consideration of funding for projects that are not part of the traditional stream of projects from lead Risk Management Authorities.

## Next Steps

Moving forward with the Flood and Coast Investment Programme, the next steps will be to:

- reconvene the FaCIP working group to consider the findings of the consultation – by summer 2015
- amend grant memorandum and new timetable for submitting claims and applications to Welsh Government – by summer 2015
- publish new flood maps for Wales (NRW) – by autumn 2015
- explore options for a database on existing defence assets
- explore options for a database of flood incidents
- revise Project Appraisal Guidance – by end of 2015
- consider options for governance of FaCIP
- consider options for a Flood Risk Index taking into account the publication of improved Flood Maps for Wales and databases of assets and historical flood incidents.
- plan effective communication with stakeholders

It was suggested through the consultation responses that the Flood Risk Management Wales committee might take on the role of governance of FaCIP or some of the responsibilities, however since this consultation closed, the Minister for Natural Resources has announced that through the Environment Bill a new Flood and Coastal Erosion Committee will be formed to provide advice on all sources of flooding and coastal erosion across Wales. The details of this committee are yet to be decided, however, in providing advice on all aspects of flooding and coastal erosion; the committee will have close links with the FaCIP Board. The governance arrangement around FaCIP will need to take into account the structure of, and links with, this new committee.

The consultation provided some very useful comments on assessing risk, recognising actual/historic flood events and whether the presence and condition of existing defences should be taken into account. The need for a consistent database of flood risk management assets has also been identified in the Coastal Delivery Plan (2015).

The feasibility of collating and mapping data on existing defence assets and recorded flood and erosion incidents will be further explored.

In response to the questions raised on the simplification of grant rates, Welsh Government wrote to all local authorities in May 2015, simplifying the grant rate for flood and coastal erosion risk management funding. All coastal schemes (coastal erosion and flooding) will now be eligible for 75% grant funding, whilst fluvial, surface water and resilience building schemes will be funded at 85%.



## Annex 1: List of respondents

A total of 34 responses were received to this consultation:

- 21 from local authorities
- 11 from organisations
- 1 from NRW
- 1 from other

Blaenau Gwent County Borough Council	Local authority
Bridgend County Borough Council	Local authority
Caerphilly County Borough Council	Local Authority
Cardiff Council	Local authority
Carmarthenshire Council	Local authority
Ceredigion Council	Local authority
City and County of Swansea	Local authority
Conwy County Borough Council	Local authority
Denbighshire County Council	Local authority
Flintshire Council	Local authority
Gwynedd Council	Local authority
Isle of Anglesey County Council	Local authority
Merthyr Tydfil Council	Local authority
Monmouthshire County Council	Local authority
Neath Port Talbot Council	Local authority
Newport City Council	Local authority
Pembrokeshire County Council	Local authority
Powys County Council	Local authority
Torfaen County Borough Council	Local authority
Vale of Glamorgan Council	Local authority
Welsh Local Government Association	Local authority
Natural Resources Wales	NRW
CLA Cymru	Organisation
Crown Estates	Organisation
Dŵr Cymru Welsh Water	Organisation
Farmers Union Wales	Organisation
Flood Risk Management Wales	Organisation
Institution of Civil Engineers	Organisation
National Grid	Organisation
NFU Cymru	Organisation
Ove Arup and Partners Limited	Organisation
Pwllheli Partnership	Organisation
Tidal Lagoon Power	Organisation
Pembrokeshire Coast National Park	Other

## **Annex 2: List of abbreviations**

FaCIP – Flood and Coast Investment Programme

FRMW – Flood Risk Management Wales

LLFA – Lead Local Flood Authority

LSOA – Lower Super Output Area

NCERM – National Coastal Erosion Risk Map

NRW – Natural Resources Wales

RMA – Risk Management Authority

SMP – Shoreline Management Plan

TAN – Technical Advice Note