

Number: WG39982



Welsh Government

Consultation – Summary of responses

Draft National Strategy for Flood and Coastal Erosion Risk Management in Wales

February 2020

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.

This document is also available in Welsh.

OGL © Crown Copyright Digital ISBN **978-1-80038-048-6**

Introduction

The Welsh Government ran a consultation on the new Draft National Strategy for Flood and Coastal Erosion Risk Management in Wales from 24 June to 16 September 2019. Welsh Ministers are required by Section 8 of the Flood and Water Management Act 2010 to develop a Strategy. Once adopted, this draft Strategy will replace the first Strategy issued in 2011.

In this consultation exercise, we sought your views on our proposed approach to manage the risk from flooding and coastal erosion across Wales.

Consultation process

The consultation on the draft National Strategy for Flood and Coastal Erosion Risk Management in Wales was published in June 2019. We asked 12 questions to help guide your responses.

The consultation document was published on the Welsh Government website, and stakeholders were invited to respond by either email, post, or through a web form. We also held three workshops, which were open to the public:

- Aberystwyth: Friday 12 July 2019
- Llandudno Junction: Wednesday 31 July 2019
- Cardiff Cathays Park: Friday 2 August 2019

We received 61 written responses and we gathered additional views and comments at the workshops. We received written responses from:

- 12 Local Authorities
- 9 Public bodies
- 3 Charities
- 2 Committees
- 3 Universities
- 5 Membership bodies
- 6 Non-Governmental Organisations (NGOs)
- 4 Private Companies
- 6 Personal responses
- 11 responses from those who have opted to remain anonymous

This summary sets out the views and comments we received in response to the consultation questions. As this is a summary document, it does not present every detailed comment, but instead it highlights the key recurring themes and issues made by respondents. We have used quotations (in full or partially) to help reflect common themes or particular sentiments. Their inclusion in this summary does not necessarily mean the Welsh Government endorses these or we can guarantee their inclusion in the final Strategy.

Responses

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?

If not, please explain how it can be improved.

There were a total of 50 responses to this question:

- 33 agreeing (66%)
- 17 disagreeing (34%)

In total, 38 of the responses offered further comments and suggested improvements. Some comments related to other questions within the consultation, and were therefore considered under the most relevant area.

Overall responses were supportive of proposals and how the new National Strategy was an improvement, with an emphasis on achievable objectives and measures. The focus on 'people and communities' at the centre of the aim was broadly welcomed.

"The Aim could be enhanced by adding 'by working collaboratively, adapting to the challenges of climate change.'" Natural Resources Wales #18

The term 'effectively managed' was questioned as being subjective and difficult to measure. Further comments were received regarding the challenge of climate change

and clarifying terms like 'coastal adaptation' to ensure consistency.

“Communication on the risks posed by climate change need to be clearer.”

Extinction Rebellion #127187812

“Whilst the strategy deals effectively with risk to buildings and infrastructure, there is a much greater risk to communities and people from the effects of climate change ...” **Translated from response by Gwynedd Council #33**

The Welsh Government response to Question 1

The vast majority of the responses we received on the National Strategy aim that it is clearer and more robust. There were however several comments relating to strengthening the terminology, ensuring consistency thus providing more clarity, which we will consider.

Question 2

Are the objectives and measures clear?

If now, please explain how they can be improved.

There were a total of 48 responses to this question:

- 35 agreeing (73%)
- 13 disagreeing (27%)

Overall, respondents welcomed the reduction in measures as well as their focus on action. Some indicated that this made the strategy document clearer, whilst offering a smarter way of delivering the objectives. However, it was suggested that many of the measures are relatively short-term and how this does not align with the aspiration of a National Strategy, which should also consider medium and long-term risks.

The **Flood and Coastal Erosion Committee (FCEC)** provided the following:

“The majority of the Measures identified (14 of 22) are to be completed by 2022 or earlier. It would be good to see longer-term aims and targets as the Strategy has an 8-year life. This is not to say that the short term targets are not appropriate, but a staggered approach could be applied, with short term (2022), medium term (8 years) and even longer term goals being set out...”

Respondents overall were positive about the clarity of the objectives and measures:

“The 5 proposed objectives clearly reflect the key areas of focus and activities needed to ensure that the aim of the draft National Strategy is met. These objectives are clear and derived from existing activities already delivered by RMAs and other services . . .” and *“WLGA welcomes the reduction in measures making the document clearer as well as offering a smarter way of delivering the objectives”* **Welsh Local Government Association #12**

Further responses included:

“The 5 objectives are very clear and consistent” and *“In terms of the measures these are clear in how they will support the objectives of the Strategy and are*

welcomed as providing a positive way forward” **City and County of Swansea**
#126958976

NRW responded how *“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 . . .”* **NRW #18**

Further comments were provided on measures under this question, for example:

Measure 1 – on considering the need for legislative change was welcomed, recognising the difficulties in setting out duties, roles and responsibilities.

Measure 15 – on updating planning advice to ensure it complemented flood guidance and new data, received widespread support from many, including the RTPI.

Measure 18 – standardising reporting of flooding to properties, had support although highlighted resources as barrier to achieving this within challenging timescales.

Measure 19 – on long-term investment; responders welcomed the measure but questioned the 2020 deadline, with some data not yet available, particularly on assets.

The language used in some measures and supporting text was considered overly polite or passive, with calls for stronger language in setting out what must be done, for example in setting roles, raising awareness and improving provision of information.

One respondent also asked the Welsh Government to consider adding a timeline column to the measures table at the end of the document, to clearly identify if activities are expected to be completed by a certain date or whether they would continue with periodic reporting.

The Welsh Government response to Question 2

Whilst our measures are designed to be clear and deliverable over the next decade, the Strategy has been drafted with a longer-term, strategic view, recognising the nature of flood and coastal erosion risk with respect to the challenges of climate change. As such, we take on board the need for longer-term measures and will consider how these can be modified. We will look to be more direct with our language where it is appropriate and helpful, to do so.

Question 3

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

Any further comments on this new objective:

There were a total of 50 responses to this question:

- 44 agreeing (88%)
- 6 disagreeing (12%)

There were no objections to Objective A. Suggestions on how we might improve our understanding and the way risk is communicated were put forward, and are summarised briefly below.

Respondents were supportive in needing to communicate flood and coastal erosion risk to communities clearly and in a way which is meaningful, thus improving resilience and helping stimulate better dialogue on how to manage it.

Making Flood Risk Assessment Wales (FRAW) maps widely available, improving data on assets and using digital services to communicate risk was welcomed.

Responses also highlighted the merits of community flood plans and using new flood measures as an opportunity to reach out to the community both prior to construction through consultation, as well as during works and upon completion, when public interest may be heightened. This can also provide opportunities to discuss the merits of different types of alleviation and how Natural Flood Management can play a role.

Monmouthshire County Council provided the following comment:

“Closer collaboration between NRW & LLFA’s to develop Community Flood Plans and engage with communities should become common place.”

Monmouthshire CC #8

The Welsh Government response to Question 3

With consultees confirming a high level of support for this objective, the Welsh Government recognises how improving our understanding and communication with

communities is paramount in reducing flood and coastal erosion risk throughout Wales.

Question 4

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

Any comments on this new objective:

There were a total of 50 responses to this question:

- 45 agreeing (90%)
- 5 disagreeing (10%)

Objective D was widely welcomed, with positive suggestions to help support and overcome perceived barriers. Many respondents praised the integrated approach adopted in updating the National Strategy and TAN15 in parallel, helping to join up these policies effectively.

The links to more informed planning decisions, using new flood maps and Shoreline Management Plans (SMPs) was widely welcomed. New legislation and further use of Sustainable Drainage Systems (SuDS) was highlighted also as an opportunity to inform the way we think about and manage water resources.

Creating stronger links between Local Lead Flood Authorities and Local Planning Authorities for SuDS and SMPs as part of planning decisions was suggested.

Further examples of general support can be seen in the following responses:

“The move away from a precautionary approach towards a more balanced, risk based approach seems sensible.” **Historic Environment Group's climate change sub group # 35**

“We welcome the addition of the new objective D and renewed effort of the WG to link the FCERM Strategy with strategic planning and TAN 15, which indicates a clear and cohesive effort from departments to work closely together.” **WLGA # 12**

“The need for community engagement for the development of adaptation plans (in addition to community flood plans) is an important step-change since the first National Strategy and demonstrates concern for longer-term resilience.”

University of East Anglia #22

“National Trust welcomes the key role that the Strategy envisages for land use planning in avoiding siting new development in areas known to be vulnerable to flood and coastal erosion risk. We recognise the holistic approach that the consultation seeks to move forward in Wales” **National Trust Wales #37**

Welsh Government's response to Question 4

The responses received support the Welsh Government view that moving to a longer-term Risk Management approach, acknowledging and adapting to climate change and working to prevent poor development decisions will pay dividends in reducing risk in the future.

Question 5

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

If not, how could it be improved?

There were a total of 49 responses to this question:

- 24 agreeing (49%)
- 25 disagreeing (51%)

Whilst views put forward in response to this question were divided, the comments offered were positive about what had been done to clarify roles and responsibilities. Most respondents went on to offer constructive comments and suggested improvements to strengthen the Strategy.

The Farmers' Union of Wales provided the following in their response:

"The National Strategy effectively explains the duties borne by the various Risk Management Authorities as well as the roles that Landowners etc. have to play in local management of flood risk." **FUW #13**

Rhondda Cynon Taf CBC commented:

"The revised National Strategy does provide better clarification of roles and responsibilities than previously, making it more useful not only for RMAs but also for public understanding." **RCT #34**

There was a strong consensus that working collaboratively with additional FCERM stakeholders should be recognised and could help drive the Strategy forward. These included Coastal Groups, Community Councils, Community Volunteers, The National Trust, The Canal River Trust, the Fire Service and Riparian Landowners.

Welsh Local Government Association (WLGA) commented:

"The section on clarification of roles and responsibilities is useful for the general public and stakeholders on the periphery of FCERM but does not provide the

type of clarification that was sought by practitioners in the 2014 Coastal Review.” **WLGA #12**

Some respondents commented that although the Strategy clearly distinguishes between the roles of different Risk Management Authorities, this might not always be clearly understood by external parties.

Denbighshire County Council commented:

“RMA’s find themselves with numerous powers, but relatively few responsibilities. Where there are powers, there are there is often a lack of clarity regarding which RMA is best placed to exercise them.. . .” **Denbighshire CC #31**

It was suggested that further clarification is needed in relation to the ownership and responsibility of assets, and given the scale and challenge of coastal risk, the role of the Wales Coastal Monitoring Centre needs to be better recognised. Many welcomed the measure to review existing legislation with a view to improving clarity and responsibilities.

NRW provided constructive feedback on roles and powers and commented:

“Figures 5 and 6 are useful summaries of the main groupings and relationships between them, and [is] a useful attempt at summarising the main points that does go a long way to help clarify roles and responsibilities...” **NRW #18**

The Welsh Government response to Question 5

We value the suggestions received and recognise that, in general, this Strategy is taking positive steps to clarify roles. We acknowledge, however, that it could go further in emphasising the roles of external parties and strengthening its language around governance, responsibilities and duties on the Welsh Risk Management Authorities. A review of relevant FCERM legislation will assist and is being included as a measure.

Question 6

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

If not, how could it be improved:

There were a total of 45 responses to this question:

- 27 agreeing (60%)
- 18 disagreeing (40%)

Respondents generally supported measures 12 and 13, along with the intent to promote and deliver a greater number of NFM schemes.

Our approach to consider NFM as part of schemes' development and reduction to flood risk was commended, whilst urging caution, suggesting that they cannot always replace hard engineering solutions. There were also concerns that NFM schemes may rarely meet the cost benefit to access FCERM funding.

Several respondents offered suggestions and improvements:

"There is maybe a need to be cautious that 'hybrid schemes' don't simply reward traditional defence infrastructure with a small 'add on' component of NFM..." **University of East Anglia #22**

"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 [the strategic management of natural resources]. 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." **NRW #18**

“The National Strategy is likely to deliver wider environmental benefits through its focus on NFM. However, there is still uncertainty as to the long-term effects of NFM and how the environment will react. Increased monitoring of and research into NFM interventions is necessary to fully understand the benefits and impacts of such schemes for future application.” **Rhondda Cynon Taf**
CBC #34

The Welsh Government response:

Responses were largely supportive of NFM and its role in managing risk, whilst bringing wider thinking and multiple benefits to a catchment as a whole. The Welsh Government recognises the need for further research into NFM interventions and we will continue to work with partners to develop the necessary evidence base to assess and support future schemes.

Question 7

Does the National Strategy clearly set out what we fund?
If not, how could it be improved?

There were a total of 45 responses to this question:

- 30 agreeing (67%)
- 15 disagreeing (33%)

Respondents generally agreed that the National Strategy clearly sets out the Welsh Government's funding strategy, and that it supports a long-term commitment for funding flood risk management. Respondents also recognised that the draft strategy effectively communicates responsibilities for managing flood risk so communities and individuals can better understand the type of practical measures and interventions the associated funding will be directed towards.

Comments included:

"The ABI supports a long-term commitment from Government for funding to increase flood risk management in Wales. This is particularly important in light of inappropriate development in flood risk areas, climate change scenarios and population growth. There must be a long-term Government commitment to increase both capital and revenue funding to protect communities from the growing threat of flooding..." **ABI #127212581**

"Capital funding for hard engineering schemes is, provided they meet the criteria, often forthcoming (and gratefully received)" **Anglesey CC #7**

"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..." and *"It is noted that Measure 20 requires the Flood and Coastal Erosion Committee to explore [partnership funding] opportunities... and this is welcome"* **NRW #18**

We received a number of suggestions and recommendations, including:

“The proposals ... on Green-grey infrastructure are welcome. This should be a funding priority for maintenance and retrospective improvements to existing schemes, as well as for new defences” **National Trust Wales #37**

“The draft Strategy falls short of committing the Welsh Government to looking at ways of bridging the revenue funding gap which is essential in ensuring RMAs are properly resourced to protect our communities and carry out all activities and initiatives proposed in the Strategy...” **Rhondda Cynon Taf CBC # 34**

Clarification should be provided... as to how it is intended to fund the WG FCERM team/structure as (along with all RMA's) there is concern that resources are being reduced at a time when onerous and important Strategy and additional requirements are being introduced” **Ceredigion C.C. #32**

“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” **NRW #18**

The longer-term challenges of coastal adaptation and the associated revenue and capital funding needs, beyond historical funding programmes were also highlighted:

“We feel [coastal adaptation] is an instance where the Strategy should provide greater ambition, setting out a vision of how Coastal Adaptation Plans could be a catalyst to do things differently and innovatively...” **CIWEM #21**

The Welsh Government response to Question 7

The responses to this question reflect how the National Strategy explains funding arrangements clearly which have been enhanced through recent improvements such as the 2018 FCERM Business Case Guidance. Several respondents asked the Welsh Government to explore further potential partnership contributions and wider funding needs to support coastal adaptation. The Welsh Government will consider the scope to place greater emphasis on the utilisation of revenue in FCERM activity.

Question 8

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

If yes, please explain how it can be improved

There were a total of 41 responses to this question:

- 19 (46%) respondents did want additional key issues or trends considered
- 22 (54%) didn't feel additional key issues or trends needed to be considered.

NRW has undertaken a full assessment of the Strategic Environment Assessment (SEA), which aims to assess the environmental impacts of the strategy. This helps to ensure that unintended adverse effects can be avoided, as well as identifying the potential for securing multiple benefits in delivering the strategy.

Respondents confirmed that the Environmental Report (ER) was comprehensive, that it provided useful context and supporting information and that this should be referenced in the final strategy itself. This will help to ensure that RMAs can apply the recommendations in their own strategies, plans and projects. Key issues or trends that could be emphasised in the ER are:

- Strengthening how climate change adaptation is considered and addressed by the Strategy and SEA.
- Recognising the role of FCERM in climate change mitigation, in particular reducing embedded carbon in FCERM projects and recognising the benefit of certain habitats as natural carbon stores.
- The Strategy and SEA should make greater reference to the historic environment, in particular to raise awareness of the risks and opportunities associated with climate change.

Respondents noted that the new SEA is comprehensive, and generally covers all significant environmental effects, which adds to the context of the Strategy and provides good background information for decision-making.

One respondent questioned if there was an over reliance on the National Habitat Creation Programme for delivery of compensation in relation to protected (Natura 2000, N2K) sites.

The Welsh Government response to Question 8

All responses received in relation to the SEA/HRA will be published in a Statement of Environmental Particulars summarising how the Welsh Government has considered them alongside the final ER / HRA and final strategy. We will also clarify how the National Habitat Creation Programme will function.

Question 9

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

If yes, please explain how it can be improved

There were a total of 43 responses to this question:

- 21 (49%) agreed environmental effects could be improved.
- 22 (51%) disagreed, no improvement were necessary.

Respondents, including Public Health Wales and Local Authorities, recommended that the effects of flooding on mental health and wellbeing, education, employment and community blight needs greater recognition in the Strategy and Environment Report, and how FCERM activity plays a positive role in all of these areas.

“The use of NFMs, SuDS and Green Infrastructure with associated access to open spaces has the potential to make significant contribution towards delivery of wellbeing goals. Increased focus on provision of these solutions provides wider benefits than simply a reduction of flood risk / increased resilience, e.g. air quality, mental health / reduced anxiety, biodiversity, urban cooling. This spans multiple planning and well-being policy objectives.” **Caerphilly CBC #26**

“[The Strategy has] no mention of protecting green spaces within communities. Maintaining a healthy environment not only protects wildlife and enhances biodiversity, but it also improves the well-being of residents and communities. Flood events can have a detrimental social impacts on mental health within effected communities, and as such there needs to be more acknowledgment within the Strategy of maintaining Wales’ natural environment to support the well-being goals and improve social, economic and ecological resilience to adapt to future risk and change.” **RCT #34**

The emphasis of the Strategy on NFM and green engineering was welcomed but it was noted how the assessment did not entirely cover the positive or negative aspects

of hard engineering approaches. It was also highlighted how more natural catchment options, like reinstating meanders, would help improve the status of rivers under the Water Framework Directive.

A respondent commented how the SEA should recognise the risk of Invasive Non-Native Species (INNS) when undertaking FCERM schemes, including in the marine environment.

NRW agreed with the direction in the Strategy in relation to identifying a baseline of coastal habitats, but also sought a clear mechanism for reporting progress in the delivery of compensatory habitat through the National Habitat Creation Programme.

The Welsh Government response to Question 9

All responses received in relation to the SEA/HRA will be published in a Statement of Environmental Particulars summarising how we have considered them alongside the final Environmental Report and Strategy. We intend to promote the positive aspects of FCERM measures where it is appropriate to do so, including the multiple wellbeing benefits of reducing risk and wider gains from more natural catchment approaches.

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.

There were a total of 23 responses to this question.

A number of respondents commented that the Welsh language requirements should not be adversely affected by the strategy:

“No specific comments other than it must align with the statutory framework and ensure suitable systems are in place to encourage and facilitate communication in Welsh.” **WLGA #12**

“Local FRM interventions provide good opportunities for promoting local jobs which helps strengthen communities, including Welsh-speaking communities.” **NRW #18**

“The Welsh language is afforded protection through legislation, including the Wellbeing Act. The Council fully adheres to the requirements and principles of this legislation and it is assumed that this is the case for other RMA’s” **Denbighshire County Council #31**

There were also constructive comments relating to potential harm and exercising care in undertaking FCERM activities to avoid any negative impact on the Welsh Language:

“Considering how the impact of climate change can displace small and large communities, there will be a possible linguistic impact of relocating these people/communities. It must be remembered that every community has a unique character, therefore it is necessary to assess and respond through specific action plans. It is also necessary to be alert to the risks to the rural

economy, such as agriculture, which could, in itself, have a negative impact on the Welsh language.” **Gwynedd CBC #25**

“The framework needs to safeguard the sustainability of areas where the Welsh language is engrained in communities; thus protecting the linguistic health and well-being of these communities...”

“The Strategy for Flood and Coastal Erosion Risk Management should ensure that policies and planning interventions identifies the linguistic profile of communities, and to put in place interventions that safeguard the linguistic nature and heritage of that community.” **Ceredigion County Council #32**

The Welsh Government response to Question 10

The Welsh Government recognises the importance of ensuring that Welsh retains a vital place in all communities. The Welsh Government is committed to ensuring that people have the opportunity to use Welsh and that the Welsh language is treated no less favourably than English.

The Welsh Government expects all public organisations to comply with Welsh Language Standards in all external communication of Flood Risk and supporting information.

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.

There were a total of 18 responses to this question

The majority of responses reiterated the need to meet existing standards or the importance of being able to communicate through the medium of Welsh:

“Figure 3 reviews each of the well-being goals, with the exception of culture and language, which is excluded. This must be addressed to demonstration consideration of all well-being goals...” **University of East Anglia #22**

“It is essential that more [officials] are able to communicate through the medium of Welsh. In areas where the Welsh language is strong, securing this will promote understanding and maximise the value and main objectives of the document as a whole.” **Gwynedd CBC #25**

“The Strategy should contribute to the continuation and growth of the Welsh language, as a family, and community language [and] provide users with the active choice of a service in Welsh...” **National Trust Wales #37**

The Welsh Government response to Question 11

The Welsh Government is committed to ensuring that people have the opportunity to use Welsh and that the Welsh language is treated no less favourably than English.

Question 12

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please tell us here.

There were a total of 34 responses to this question.

The final question was an opportunity for respondents to raise any issues not covered in previous questions. We received 34 substantive responses to this question. Some of these related to the village of Fairbourne, raising a variety of issues around how the strategy could support such communities. The strategy does not stipulate specific options or solutions for reducing risk to individual communities. Instead, the strategy has been designed to confirm the overarching policy framework, enabling Welsh Risk Management Authorities to fully consider all possible options when deciding how to manage risk in communities, in consultation with residents. The Welsh Government would like to thank respondents for their views and the important contribution they continue to make in considering future options in relation to Fairbourne.

Of the other comments received, many were less significant and will be taken forward through refinements to the final strategy. Where comments highlighted important themes, we have summarised them below.

Clarity of planning policy was considered important to control development in flood risk areas as well as the need to recognise the cumulative impact of small developments in the flood plain. In particular, some highlighted that affordable or lower cost housing development should not be allowed to proceed in flood risk areas, where those least able to afford to deal with flooding are potentially at the highest risk.

A number of respondents reiterated comments made earlier in their contributions: that there is a need for ongoing increases in Government spending, both revenue and capital, to maintain existing assets as well as develop new ones.

Respondents suggested a need for cross-border cooperation, as an example around Shoreline Management Plan refreshes.

There was support to see flood data made more widely and freely available, including the National Asset Database.

Several respondents wished to see a greater role for adaptation within the Strategy, recognising that flooding will increase in severity and frequency under climate change.

Many responses noted that the language used in some measures and objectives is too aspirational and insufficiently direct. For example, the Flood and Coastal Erosion Committee felt that WG 'encouraging' land management to reduce run-off was not strong enough with regard to NFM.

There was support for FCERM schemes to improve place-making and maximise their contribution to local amenity. This was seen as an important mechanism for engaging communities in co-designing flood alleviation schemes.

Greater prominence on SuDS was raised, in particular to promote retrofitting SuDS.

There was support for more upfront information about flood risk, and riparian ownership issues, to be made available to home-buyers and tenants.

The Flood and Coastal Erosion Committee commented how:

“the success of the Strategy will depend on the effectiveness of strategic management processes and leadership to drive its delivery, linked to strategic organisational development. The Committee will seek to make its own contribution to these factors, in order to sustain high levels of confidence that the Strategy can be implemented successfully.” FCEC #19

The Welsh Government response to Question 12

The Welsh Government is pleased to note the positive comments about the draft Strategy and will take into account the suggestions to strengthen or clarify its content to enhance the document and better communicate how we will address flood and erosion risk.