

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros
Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate
Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref MA/HIDCC/0964/25

Dr David Clubb (Chair)
Dr Eurgain Powell (Lead Commissioner)
Eluned Parrott (Lead Commissioner)
National Infrastructure Commission for Wales

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17 April 2025

Dear Dr David Clubb, Dr Eurgain Powell and Eluned Parrott,

Thank you for bringing forward the National Infrastructure Commission for Wales' review into **Building Resilience to Flooding in Wales by 2050**.

I welcome the work the Commission has undertaken to explore these issues, and the open and values-led approach adopted. It is clear this has encouraged stakeholders to think differently in engaging with the challenges flood risk will pose, in a changing climate, over the next 30 years. The evidence base you have developed, including the supporting technical reports offer further insight alongside the recommendations themselves.

This winter season has again demonstrated the reality of what it means to live with more frequent and severe floods and the need for our response to develop further.

Your report recognises that flood risk management is a complex long-term issue, which requires collaboration and multi-disciplinary thinking to establish solutions fit for our future generations. Although it is not possible to prevent all flood incidents, we need to ensure we are collectively building greater resilience against flood risk for communities across Wales, both now and in the future.

In welcoming the report as a whole, I have taken the opportunity to respond to each recommendation in turn:

Recommendation 1 – Establish a new Water Commissioner by 2026

The Welsh Government recognises the issue this recommendation intends to address, which is to provide strategic leadership to integrated planning for flood risk at catchment level.

The Independent Water Commission (IWC) recently published its call for evidence ([Independent Commission for Water – call for evidence - GOV.UK](#)). This highlights a similar

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

challenge and seeks views on the possibility of what it describes as a ‘system planner’ *“as a way of overcoming siloed decision-making in the water system.”*

Given the overlap between your recommendation and the IWC’s emerging thinking, I am keen to consider them together before determining a way forward. This means I will be returning to this issue after the IWC reports in the summer.

I agree there is a gap in relation to strategic, integrated planning which does need to be addressed. I will be testing carefully the added value a new body, or specific functions being vested in an existing body, could therefore provide in addressing this gap, against the cost and potential complexities it may bring. I would welcome the Commission’s engagement in this policy thinking.

I should be clear that, were this, ultimately, to be the direction we proceeded in, any new body (or any additional functions for an existing body) would not be in place by 2026.

In the meantime, we will continue to work closely with key partners to identify where strategic coordination would bring benefit.

Recommendation 2 – Create a long-term 30-year national flood and coastal erosion resilience strategy by 2026, based on a 30-year vision for flood resilience and a catchment approach.

I agree that having a long-term vision and strategic plan is essential for delivering longer term resilience and adaptation, but there is a balance to strike between a focus on setting that longer term vision and translating the vision into action on the ground and focus on delivering for our communities.

[The National Strategy for Flood and Coastal Erosion](#), published in October 2020 sets out our vision for flood risk management until 2030. It outlines the areas we expect our partners and ourselves to work towards over the statutory 10-year period but also includes policies extending to 100 years. I further published the Climate Adaptation Strategy for Wales in October 2024 which outlines our significant commitment to responding to the changing climate. Within the document, we recognised that flooding impacts every policy area.

Nevertheless, reflecting on the most recent storm events over the winter, it is clear that a renewed conversation about flood risk management and building resilience in at risk communities is needed. A new vision and strategy are not required to stimulate that discussion or to set the direction emerging from it but may offer a helpful way to frame such a dialogue.

I should also note that, again, there are overlaps with some of the IWC’s thinking particularly in relation to the focus in your recommendation on streamlining existing plans and structures through this approach. Although many of these plans and structures are currently separate for water and for flood, there is a clear opportunity for integration given they all relate to water or the interaction between land and water. Therefore, while I do not intend to produce a revised vision or strategy by 2026, I anticipate this will be an issue which will be returned to in the next Senedd.

Recommendation 3 – Incorporate nature as a key stakeholder by 2028

I do not intend to progress the recommendation to *“incorporate nature as a key stakeholder by 2028, giving nature a voice around the table and considering opportunities to enshrine natural assets in law, or updating the Environment Act 2015, to give rights to natural assets in decision-making”* at this time.

I recognise there are examples globally of where nature, or specific natural assets, have been given rights. It would require detailed consideration to test the appropriateness of such an approach in Wales. This is an area where there is growing discussion and Welsh Government will continue to monitor developments.

In the meantime, the Well-being of Future Generations Act 2015, the Environment Act 2016 and the planned Environmental Governance and Biodiversity Targets Bill provide a clear framework to recognise and value nature in policy and decision-making in Wales.

Recommendation 4 – Ensure Planning Policy, TAN 15 avoids unnecessary development in flood risk areas

Policy 8 in Future Wales sets out the Welsh Government's approach to flood risk in the planning system. In addition, the Cabinet Secretary for Economy, Energy and Planning, published the new version of TAN 15 Flooding and Coastal Erosion on 31 March.

The new TAN15 ensures we are maximising environmental protection, safeguarding growth in our economy and creating sustainable communities. The recent pause has been a valued opportunity to build further resilience ensuring future plans recognise local authority activities whilst meeting the challenges posed by the climate change emergency.

Alongside the publication of the TAN, a new Notification Direction has been issued which requires any Local Planning Authority which is minded to approve new highly vulnerable development in flood zone 3, where it is not on brownfield land, to notify the Welsh Ministers before any planning consent can be issued. We have also recently recommenced the Wales Planning Performance Framework which collects information on development in areas of flood risk. Data sets collected as part of the framework are due to be reviewed later in 2025. This could include proposals to collect new data sets on development and flood risk.

Recommendation 5 – Pilot regional / local catchment partnerships by 2026

I am clear that we need to move to a more systematic catchment focus for managing flood risk, water quality and water resources. We also recognise the need for place-based, whole system approaches to climate adaptation to address many wider areas of climate-related risks and this is something we would be interested to explore further with the National Infrastructure Commission Wales and others.

As your report highlights, there are examples of this in practice locally and groups like Nutrient Management Boards bring together the stakeholder you have highlighted to address environmental water quality.

I intend to explore a pilot, building on existing examples, to test the most effective approaches. It will be important to take the time to develop a meaningful pilot from which real learning can be taken and a systematic approach will not be in place by 2026.

Area Statements, under the Environment (Wales) Act 2016 provide a potential mechanism to underpin catchment partnership working. This is something my officials are exploring with Natural Resources Wales.

Our Climate Conversations last year focused on climate change adaptation, and I will consider the learning we can take from that to apply more focused engagement with citizens relating to what climate adaptation means for their community. We will publish in the Summer, the outcomes of a Deliberative Engagement Review which will recommend how

we can build on this activity, and work with others, including National Infrastructure Commission Wales, on opportunities for joined-up approaches to community engagement activity.

Recommendation 6 – Establish a new Water Resilience Flood Forum for Wales by 2027

The recommendation focuses on building community capacity to plan for, and respond to, flooding and I agree should be addressed as a priority. It is an issue which has been discussed extensively in the Senedd over recent months and there is widespread support for this recommendation.

I agree there is a space at national level where a ‘Water Resilience Flood Forum for Wales’ or equivalent could valuably fill and which would complement formal civil contingencies structures, by working directly with communities to develop resilience and enable support during an incident.

We recognise the importance of working to support communities during flood events and in developing long-term resilience. Natural Resources Wales and Local Authorities are both funded to engage and empower communities to prepare and manage potential flood risks and will have an important role in progressing this recommendation, drawing on their experience.

I support the establishment of more groups at community level to support resilience. Some of the detailed proposals, including funded ‘agents of change’ roles, access to technical advice and home flood assessments will require further work before we could implement but I am keen to explore this further.

I have asked officials to work with the National Flood Forum (NFF) to explore the role they could play to better support communities in Wales. I would see this as part of a suite of support for communities rather than developing as a single source of support.

Recommendation 7 – Streamline Flood and Coastal Erosion Risk Management (FCERM) plans into catchment resilience strategies by 2026

I agree that integrated catchment planning should be our focus in the future and, as noted above, this is an area the IWC have highlighted in their call for evidence.

Developing this approach will take time and require buy-in from Local Authorities, NRW, water companies, landowners and land managers and other partners. I have asked my officials to develop a roadmap to catchment planning for water, which will identify how we could move towards this approach.

To help with the adoption of catchment resilience practices on a wider basis, we have recently published natural flood management opportunity maps on Data Map Wales. The opportunity maps help partners identify potential locations where natural flood management can be most effectively implemented. We are working with colleagues in Natural Resource Wales to build on this evidence base to assist in the development of future catchment-scale interventions.

Recommendation 8 – Involve communities in the decision-making processes

I agree it is important to involve communities in decision making processes related to flood risk. Our Flood and Coastal Erosion Risk Management Business Case Guidance, which is used by Local Authorities and Natural Resources Wales to develop all flood risk

management schemes in Wales, has the principles of the Well-being of Future Generations (Wales) Act 2015 embedded throughout. The guidance sets expectations to engage key stakeholders at every stage of the scheme development process, including working with communities when developing flood risk management proposals.

Natural Resources Wales provides support and advice through engagement sessions to advise communities and groups on the completion and testing of community flood plans to enable communities to be more proactive and resilient.

Through our work on climate change, I have commissioned Kings College London to review different methods of deliberative engagement (including citizen juries) and that report will provide a helpful evidence base to inform the approach to deliberative engagement on flood risk management.

Through our involvement with the joint Flood and Coastal Erosion Risk Management Research and Development Programme, Welsh Government have been able to input into research on communicating information for flooding and coastal management more effectively, the findings of which can help inform the way we engage communities on flood risk. I have asked my officials to consider specifically how to ensure equitable access to information and how to enable engagement in decision-making for diverse groups.

As we develop catchment planning approaches, there will be opportunities to test the most effective way to engage communities.

Recommendation 9 – Set up cross-sector NFM climate change adaptation and resilience fund by 2026

The budget for 2025/26 includes specific provision of £2m for natural flood management. I am keen to build on this in a way which supports the thrust of this recommendation.

It is clear, though, that public funding will be insufficient for the scale of the ask in this space. Investment in the sustainable management of natural resources is vital but we need to ensure any markets for nature and environmental services harness the capabilities and resources of the private sector. They must be well-designed and governed to prevent 'greenwash' and ensure they are high integrity, deliver real environmental improvement and engage with and benefit local communities. I have recently announced next steps following the consultation on the Sustainable Investment Principles and building resilience in our natural systems and supporting climate adaptation will be an area of priority.

Recommendation 10 / 11 – Flood and coastal erosion risk management

I recognise the case for investment in this area and the benefit multi-year settlements would offer. These issues have also been raised in Natural Resources Wales' *'Long Term Investment Requirement Report'* and by the Flood and Coastal Erosion Committee.

The Welsh Government is constrained in the way in which it receives its own budget and whether that provides certainty for a single year or for several. I have asked my officials to consider what more we could do in this space, recognising that other areas of infrastructure investment have longer term investment plans.

I am very conscious of the challenges in relation to the workforce and wider capacity in this area. A small subgroup of Flood and Coastal Erosion Committee are working up proposals for consideration, this includes proposals which would look to generate funding.

As noted in response to recommendation 9, work is underway to build on the Sustainable Investment Principles to secure sustainable, ethical investment in building resilience in our natural systems. Recommendation 11 contains several ideas of different sources of additional funding which I am keen we explore further.

Recommendation 12 – Set up a taskforce by 2027 to explore uptake of nature-based solutions

I am keen to encourage uptake of nature-based solutions and to work with partners to raise awareness and address barriers. The Welsh Government is investing in nature-based solutions. So far, this Senedd term we have invested £5.5m into embedding natural flood management across Wales.

At this time, I do not intend to establish a taskforce or similar group on this topic but will keep this under review.

Recommendation 13 – Provide subsidies to those in receipt of benefits to build flood resilience at the property level

In general, Local Authorities and Natural Resources Wales are best placed to deliver property flood resilience measures. Property flood resilience schemes are most effective when they are delivered on a community basis, because they can ensure that measures are properly installed and provide guidance to residents on how to use them. This approach is also more efficient because it provides economies of scale and better value for money.

The Welsh Government encourages Local Authorities and Natural Resources Wales to develop property flood resilience schemes wherever they are shown to be cost effective. We also encourage them to deliver property flood resilience schemes as an interim measure, to provide reassurance to communities whilst a formal scheme is in development.

Householders who received property flood resilience measures via these schemes do not need to provide a financial contribution and actions will be targeted towards the most at-risk communities.

I intend to continue to make funding available to support these measures and will explore how investment in property level flood resilience, particularly for those at highest risk and who are least able to manage the costs of flooding, can be scaled up.

I will explore with Cabinet Secretary for Housing and Local Government the scope for these measures to be included, where relevant, alongside other investment to improve housing quality.

Recommendation 14– Integrating flooding and climate adaptation and resilience in school curriculums

Learning about the environment and climate change is mandatory within the Curriculum for Wales, through both Humanities and Science and Technology Areas of Learning and Experience, as well as providing opportunities for schools to embed learning within the Health and Wellbeing Area of Learning and Experience. This ensures learners engage with the challenges posed by the climate and nature emergency and provides opportunities for schools to select a range of related topics and learning contexts related to climate change such as flooding.

Teaching should include specific climate focuses, and how these support learners to achieve the Four Purposes of the curriculum.

Qualifications Wales are reforming GCSE qualifications to reflect the content of Curriculum for Wales. The purpose of qualifications reform is to enable all learners to achieve the four purposes of Curriculum for Wales. The new [National 14-16 Qualifications](#) suite is being taught in schools from September 2025, September 2026 and September 2027.

Qualifications Wales are also leading a review of made for Wales AS and A- Levels. WJEC have been asked to conduct a targeted review of approved AS and A levels in Wales to identify any inconsistencies with, or gaps in relation to, the new GCSEs and related qualifications. Where appropriate, WJEC will then amend the current AS and A level qualifications. Work is at a very early stage and there is currently no budget for such activity within Welsh Government. Any proposed actions would need identified funding routes, including from outside Welsh Government.

There are other avenues of learning and building skills outside of the school curriculum including the work being undertaken by the Wales Coastal Monitoring Centre who are a 100% Welsh Government funded organisation supporting monitoring and communication of our coastline's evolution.

I do not intend to establish a national campaign on flood resilience and adaptation at this stage but, as we review the impact of our approach to climate change engagement, I will be looking specifically at how we address climate change adaptation issues, with flood risk management as a key priority.

Recommendation 15 – Supporting the development of blue skills and a new discipline of Water Environment

I recognise the need to further development the skills offer for flood risk management and related disciplines. As referenced earlier in this letter, a small sub-group of the Flood and Coastal Erosion Committee are working up proposals for consideration, which will encompass new qualifications and focus on multi-disciplinary needs in this space.

Recommendation 16 – Provide wider knowledge, skills flood resilience training by 2028

Local councillors, town councils, and community councils, play a pivotal role in supporting their respective communities and it is important we continue to support them to undertake this role. Work is already underway, I understand via WLGA who is planning a series of flood risk management awareness training for elected members.

I would also see building capacity in the way suggested in the recommendation as being directly linked with taking forward recommendation 6 to support local elected representatives in supporting communities in managing flood risk.

Recommendation 17 - Establish open and transparent access to data by 2028

Effective flood warning is critical and why we have invested £6m in Natural Resources Wales' new Flood Warning System. Natural Resources Wales are engaging with the Met Office, Environment Agency and the Flood Forecasting Centre to identify new developments, for example in surface water warnings, which we would want to be able to apply in Wales.

We have already established a JIGSO platform hosted on DataMapWales, which enables access to information pertaining to vulnerable people in "at risk" properties and is available to responders during a major incident. Taking the learning from this winter's storm events,

Welsh Government's National Security and Resilience Team are looking at how we can further improve access to high quality and comprehensive data.

Our National Strategy for Flood and Coastal Erosion Risk Management in Wales makes clear our commitment to improving standards, creating open dialogue and working collaboratively to publish publicly available mapping and modelling of risk in Wales.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Huw Irranca-Davies', with a stylized, flowing script.

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