

Wales Flood and Coastal Erosion Committee

Draft National Strategy for Flood and Coastal Erosion Risk Management in Wales - Consultation Response.

Your name	Martin Buckle
Your address	
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	<u>Wales Flood and Coastal Erosion Committee</u>

Consultation Response Form

Wales Flood and Coastal Erosion Committee

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Background

- 1) The Committee has been established by the Environment (Wales) Act 2016, Section 81, to offer advice on any matters relating to flood and coastal erosion risk management (FCERM).

The Consultation Response

- 2) The Committee welcomes the opportunity to respond to the draft National Development Framework (NDF) for Wales. While we do have comments in response to a number of the questions set out in the consultation document, we also have a number of more general comments which are set out below and precede our question-specific comments.

Flood Risk as a National Spatial Planning Issue

- 3) As the highest tier development plan, the NDF's purpose is to '*focus on issues and challenges at the national scale*' and to influence lower tier Strategic and Local Development Plans. Flood risk is the most significant natural hazard we face. Climate change is intensifying this risk. We are concerned that the draft NDF does not adequately identify the significance of present day and future flood risk, nor the critical role that planning decisions can have on reducing or increasing flood risks. The NDF should indicate how current and future flood risk has been taken into account in developing its spatial strategy.

The FCERM Strategy

- 4) The FCERM message in this consultation is very limited, and it represents a missed opportunity to set a strong and clear message which is needed to cascade down the tier of plans. It is surprising that there is no explicit reference or connection made to the National FCERM strategy, and the critical role planning has in delivering the FCERM Strategy objectives and avoiding developments in vulnerable areas. The NDF could also helpfully identify the essential role that the planning system has to play in leveraging in funding to support existing flood defences upon which new development is dependent, as well as existing communities. This is required to address the challenges of sustainable place making within those growth centres at risk of flooding.

Steering Development Plans Towards Resilient Place-Making

- 5) There is a need to focus the strategies in Strategic and Local Development Plans (SDPs and LDPs) on addressing the challenge of sustainable development and place making in existing urban centres at risk of flooding. There is a case to be made for all new development to contribute to achieving place based resilience to flooding and coastal change. Key issues will increasingly arise in considering proposals for redevelopment within settlements where significant flood risks are present. This would involve spatial planning and investment planning (including regeneration and development) being more effectively integrated with FCERM. Links between planning and FCERM need to create resilient, hydrologically sensitive places, which can accommodate the natural processes of flooding. The NDF could play a key role in steering SDPs and LDPs in this direction.

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Coastal Adaptation

- 6) With rising sea levels, coastal adaptation will be one of the most critical challenges that Wales faces over coming decades. This will have spatial implications at the national level, given the national importance of the Welsh coast in terms of people, property, industry, tourism and the environment. Development Plans at all levels will need to play a role in steering a course on this critical issue. The NDF could play a valuable role in facilitating this, but the current draft does not do so. It is notable that English planning guidance now requires development plans to identify "Coastal Change Management Areas". With all Shoreline Management Plans now needing to be updated, the NDF could play an important role in developing a similar approach and in linking these processes and SDPs together. Coastal adaptation is a cross cutting issue, and alignment of planning with FCERM and wider government policies will be of critical importance, both within the Welsh Government and in local government.

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1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	Don't know	No opinion
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

While we would not disagree with any of the outcomes individually, we feel that they are insufficient to represent a realistic vision for the NDF. The NDF gives little recognition to the implications of climate change for Flood and Coastal Erosion Risk Management (FCERM), and the effects this will have on settlements throughout Wales. Flood risk is the most significant natural hazard we face.

As stated by the Welsh Government's own draft FCERM Strategy:

"As the climate changes we can expect risks to increase, with more frequent and severe floods, rising sea levels and faster rates of erosion of the coast. This is likely to mean more communities will be affected by flooding and coastal erosion, including some that are not currently considered to be at risk."

"Managing the risk from flooding and coastal erosion is a priority for the Welsh Government."

"FCERM in Wales is more than just the building of defences. Our risk management approach encourages wider resilience, prevention and awareness of risk so that better decisions can be made, both by the public and those with an influence on how land and water is managed."

The NDF Spatial Strategy needs to demonstrate how the planning system will help to deliver the aim and objectives of the FCERM National Strategy. A key objective of that strategy is: *"Preventing more people becoming exposed to risk"*. The FCERM Strategy

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states: "The Welsh Government wants its planning and FCERM policies to complement each other, reducing risk by preventing inappropriate development in the flood plain, and helping planning authorities make clear decisions based upon the best available information."

We believe there is a compelling case for the NDF to play a more explicit role towards this end, with the NDF giving a clear steer to authorities preparing SDPs and LDPs on their roles and responsibilities in this respect. Reflecting these concerns, the proposed NDF outcomes are incomplete without an outcome that recognises and responds to these challenges. We therefore propose the addition of a further outcome which reflects the aim of the FCERM Strategy:

"A Wales where people live ...

12. in places where the risks of flooding and coastal erosion are effectively managed and mitigated."

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

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Given the lack of recognition of tackling flood risk amongst the NDF's proposed outcomes, it is not surprising that neither the policies for urban areas nor rural areas recognise the important role of planning in helping to deliver the effective flood risk management which would make sustainable growth in urban and rural areas achievable.

The majority of the settlements identified for growth and many urban centres are in flood risk zones. While the NDF acknowledges this to some extent for some areas of North Wales, it fails to make this clear also for Mid, West and South East Wales. It is not evident how considerations of flood risk, and the need for investment in flood risk management infrastructure, have influenced the selection of urban centres for growth.

Clearly, promoting development in existing urban centres makes sense, and is sustainable in terms of access to transport and other services. There should though be a greater emphasis on the need to consider increasing pressures due to climate change, and the need for investment in flood risk management infrastructure, and for flood resilient design of buildings, to achieve the NDF's outcomes.

Ultimately, it is important to recognise that, not only can there be too much development, and the wrong type of development, but also development in the wrong place.

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

However, see below.

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

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The NDF provides an opportunity to influence the inclusion of flood resilient design into housing, in areas where property is at risk. Building resilience into designs will help to deliver growth in urban and rural areas which is genuinely sustainable.

The increasing vulnerability of an aging population to climate change generally and flood risk particularly emphasises the importance of flood resilient building design.

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

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6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

While we welcome the recognition of the vital role of green infrastructure in enhancing biodiversity, it is important to recognise the much wider role that it can play in securing sustainable growth in urban and rural areas. Green infrastructure can also play a vital role in tackling flood risk management, particularly in helping to deliver natural flood management as prioritised by the FCERM Strategy. Flood plains are an important element of green infrastructure and need to be protected. Green infrastructure also has a role in improving air and water quality. Sustainable Drainage Systems (SuDS) as green infrastructure have the potential to deliver multiple benefits. The NDF could helpfully add emphasis to the wider role of green infrastructure in delivering its spatial strategy.

Similar considerations would apply to the proposal to establish a national forest.

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
District heat	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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networks

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

While policy on tidal energy may be beyond the scope of the NDF, it is important to recognise that tidal energy proposals may have profound implications for the spatial strategy set out in the NDF. Tidal lagoons, for example, could play a role in tackling the risks posed by coastal erosion and rising sea levels, and could change the potential for growth in related coastal settlements.

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

While we welcome the preparation of SDPs, we are concerned to note the absence of flood risk from the considerations to be addressed by them. We note that the reference to infrastructure refers only to transport and connectivity, and that flood risk infrastructure is omitted. The national network of flood defences should be regarded as essential national infrastructure, and acknowledged and recognised as such by the NDF and lower tier plans.

We would propose that the list of outputs expected from SDPs should be extended to include the following:

"A framework for development that has regard to flood and coastal erosion risks, and that identifies critical infrastructure, including the need for further investment in it."

We welcome the statement referring to the North Wales Coastal settlements that:
"Strategic decisions on flood management and related investment must be co-ordinated with decisions to direct development to growth areas."

However, this statement is no less applicable to the other regions of Wales, and might be more appropriately located under Policy 16 on SDPs. It would also be helpful if the NDF could elaborate on the mechanisms for achieving this co-ordination.

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While the infographic for North Wales includes a reference to flood risk, we would question the analysis that led to the conclusion that this should not also be highlighted for both Mid and West and South East Wales. Flood risk arising from rising sea levels is significant around all the coasts of Wales, including the Severn Estuary. In addition many of the identified growth centres experience significant present day flood risk, and this will increase with climate change. Flood risk needs to be given more status in each of the regional statements.

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We would broadly support the proposals, but would draw attention to the fact that, while the infographic on p48 of the NDF refers to areas of the northern and western coasts having significant risks of flooding, this should also refer to such risks along the Dee Estuary and in the Dee catchment.

Many of the settlements along the North Wales coast contain particularly vulnerable development, with an elderly population housed in single story dwellings. The NDF could helpfully require the SDP and LDPs to consider mechanisms in particular for addressing these concerns.

Highway and railway links across the North Wales coast are at risk of flooding. The SDP for North Wales will need to be underpinned by strategic flood consequence assessments that consider the present day and future flood risks to this transportation

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network. This should specifically include impacts on Holyhead, and include sensitivity testing for different climate change scenarios.

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

See earlier comments on flood risk in Mid, West and South East Wales

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

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See earlier comments on flood risk in Mid, West and South East Wales

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

We have noted the following recommendation in the ISA, and the Welsh Government's response to it below:

ISA Recommendation:

"The NDF could include greater focus on flood risk in Wales and how this will change as a result of climate change, particularly as the NDF seeks to support development in various regions where there is extensive flood risk such as Newport, Cardiff and Deeside. The NDF could explicitly refer to the need for any development supported in the NDF to accord with Welsh Government policy on flood risk, to avoid building on active flood plains where feasible, to incorporate Sustainable Drainage Systems and other measures to help alleviate flood risk for the development and nearby properties."

Welsh Government Response:

"•PPW and TAN 15: Flooding: sets out national policy in relation to flooding. PPW includes policy in relation to SUDs. The NDF does not repeat this national guidance, which applies to all development in Wales alongside the NDF."

•The Draft NDF identifies the importance of flooding as an issue and identifies flooding in the context of each region and the importance of flooding issues informing regional strategic decisions on locations for growth and new infrastructure."

•Given the well-established existing policy guidance on flooding, it is not necessary to repeat this in the NDF."

We recognise the important role that PPW and TAN 15 play in setting out policy and guidance on planning and flood risk management. However, we nonetheless feel that there is an important role for the NDF in integrating issues arising from flood and coastal erosion risk management into the NDF spatial strategy, and in setting the context for SDPs and LDPs. This is reflected in the remainder of our comments on this consultation.

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13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

14. Welsh Language

We would like to know your views on the effects that the NDF 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.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. 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
- II. 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.

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

1. Climate Change – The recognition of climate change as a key challenge for the NDF to address is welcomed. However, while its implications for carbon emissions, biodiversity, ecological networks and water resources are noted, the absence of any

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recognition of the link between climate change, increasing flood risks, rising sea levels and coastal erosion is surprising. These are key challenges for Wales, and there is an important role for the NDF to play in addressing them.

2. Infrastructure – The draft NDF makes a number of references to different types of infrastructure, but does not at any point recognise the importance of flood risk infrastructure. The national network of flood defences represents a huge public capital investment which in many places makes development possible. With climate change, its significance in decisions about development will inevitably grow. This really does need to be reflected in the document and its spatial strategy.
3. Model of NDF Influence – The model provides a helpful overview. However, the absence of the national FCERM Strategy from the list of Government Policy and Strategy is surprising. Similarly, the sources of independent advice could be extended to include the Flood and Coastal Erosion Committee.
4. While the Model includes a reference to the Wales Infrastructure Investment Plan (WIIP) , the draft NDF gives little indication on how these two key Welsh Government strategic documents relate to each other. The NDF could helpfully explain how it is helping to implement the WIIP, and what steps will be taken to ensure that the next update of the WIIP will reflect the policies contained within the NDF.
5. Areas of Significant Flood Risk – It would be helpful if the NDF were to reference the nationally significant flood risk areas identified in the latest Flood Risk Assessment by NRW.
6. Implementation, Monitoring and Review – A key to the success of the NDF will be the arrangements made for regular reports on its implementation, and the way in which progress in achieving its outcomes is monitored. As a 20 year plan, it could be expected that not all of the proposals will be taken forward in parallel. It would be helpful if some indication of phasing were provided. The NDF could also helpfully include some information on what arrangements are proposed for monitoring and review.

16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here

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