

Wales Flood and Coastal Erosion Committee

Resources for Flood & Coastal Erosion Risk Management in Wales Final Report of the Resources Sub-Committee

May 2022

1. Introduction

- 1.1 The Flood and Coastal Erosion Committee was established by the Environment (Wales) Act 2016¹ to advise the Welsh Ministers on all aspects of flood and coastal erosion risk management (FCERM).
- 1.2 The flooding events of recent years have emphasised how the climate emergency is affecting communities and businesses across Wales. The consequences of climate change are already upon us. Those events have highlighted the urgency of making further progress in strengthening our resilience. As we face increasing risks, there is a need to work harder to ensure that an effective longer term multi-year programme of risk management activity is in place.
- 1.3 The new National Strategy for FCERM,² published in October 2020, represents a key step forward in providing the leadership required to tackle these challenges. The Committee is determined to play a full role in getting the Strategy implemented.
- 1.4 This report sets out our advice to Ministers with regard to resources for FCERM. This reflects the obligation placed on the Committee by Measure 24 of the National Strategy, to explore opportunities to maximise resources for FCERM in Wales, including partnership funding contributions. The report includes a guide to acronyms in Annex 2.

2. Background

- 2.1 In order to progress this aspect of our work programme, the Committee established a Resources Sub-Committee, and this met for the first time in August 2020. Its terms of reference and the scope of its review were agreed by the Committee in September 2020. Membership of the Sub-Committee is as follows:

Martin Buckle (Chair)	Anne-Marie Moon	Karen Potter
Jean-Francois Dulong	Jeremy Parr	Darren Thomas

- 2.2 At the outset, the Committee agreed that the scope of the resources under review should extend beyond capital and revenue budgets, to include all of the resources required to deliver effective FCERM services. Accordingly, the issues identified range widely. Our proposals for resolving them (See Annex 1) are grouped under the headings listed in the table below.

¹ <http://www.legislation.gov.uk/anaw/2016/3/contents/enacted>

² [40996 National Strategy for Flood and Coastal Erosion Risk Management in Wales \(English\) \(gov.wales\)](https://www.gov.wales/40996/National-Strategy-for-Flood-and-Coastal-Erosion-Risk-Management-in-Wales-English)

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3. The Scope of the Report

It was agreed at the outset that the review undertaken by the Sub-Committee would not include resources linked to Sustainable Urban Drainage, given that review arrangements were already in place with this focus. Similarly, the report does not include a review of the resources available to water and sewerage companies, whose activities and funding are regulated by Ofwat.

4. How We Reached Our Conclusions

The work of the Sub-Committee was given an initial steer by input from consultees who had responded to the Draft National Strategy. A wide review of existing literature was also undertaken to draw on existing sources of evidence. It was these steps that enabled issues to be identified for consideration. Options were generated for responding to them. These options were then evaluated against a set of agreed criteria, and tested for their feasibility

and acceptability. As a result, a number of options were selected for further development, and these led to a range of proposals set out in a Draft Final Report.

5. Interim Progress

During the course of our deliberations with the FCERM community in Wales, a number of our early draft proposals have already been considered, and have subsequently been acted upon, in whole or in part. Since we started work, we have seen revisions to the Grant Memorandum which sets out how Welsh Government FCERM Grant Aid is made available to Risk Management Authorities. New planning guidance has been drafted in the form of Technical Advice Note 15 on Development, Flooding and Coastal Erosion, which is proposed to come into force in June 2023. Most notably, along with substantial projected increases in draft capital and revenue budgets administered by the Welsh Government's Water, Flood and Coal Tips Safety Division for 2022/23, we have also seen significant progress towards multi-year budget settlements.

6. Consultation Ahead of the Final Report

The Draft Final Report provided an opportunity to undertake a focused consultation exercise on our proposals. This was targeted at those organisations who responded to the initial call for input, together with a selected number of additional organisations who may have a role in the implementation of the proposals. The outcomes of this exercise are being reported to the meeting of the Committee in May 2022, with consequential amendments to the report. At this point, the report is being finalised, and its proposals taken forward as recommendations to Ministers.

7. Opportunities for Maximising Resources for FCERM

Annex 1 sets out 20 proposals, grouped under the headings set out in Table One. Several of the proposals are of significant breadth, and are in the form of a proposition that a more detailed action plan should be prepared on a particular topic. In all cases, guidance on the content is offered, and in some instances, a number of actions for inclusion within that action plan are also identified. The annex also identifies the agencies which would need to play a role in the implementation of each. It is evident that taking the proposals through to implementation will require a significant commitment of organisational capacity, and will need to be phased over several years. Of particular significance and urgency therefore is Proposal 10, which involves creating the capacity to lead a programme of resource improvement across Wales. In recognition that capacity to progress the wide range of proposals contained within the report will nevertheless be constrained, a number of the proposals include the proposition that they should be progressed by "commissioning a project".

8. Skills and Capacity – Key Priorities

As the Sub-Committee has progressed its workload, it has become evident that an increasingly critical constraint on the delivery of effective FCERM services, and on the achievement of the objectives of the National Strategy, lies in the capacity of our Risk Management Authorities, and that of the Welsh Government Water and Flood Team. The

issues and proposals set out in Section 4 of Annex 1 on Skills and Capacity are therefore seen to merit particular urgency. Proposal 11, to establish current capacity and skills, and requirements, and to propose a model which will maximise effectiveness in the use of staff resources, is also seen as an urgent requirement. Similarly, Proposal 12, to establish a working group, including the professional institutes and the education sector, to develop educational and training opportunities in FCERM in Wales, is also recognised as a key priority.

Annex 1 - FCEC Resources Sub-Committee – Final Report – Issues and Proposals

<u>1. Capital Funding and the Schemes Pipeline</u>		
1.1 Levels of Capital Funding		
<p><i><u>Issue 1</u> - Pressure on FCERM infrastructure will increase due to climate change, with levels of capital funding needing to rise significantly in order to prevent an increase in the numbers of properties at risk.</i></p> <p><i><u>Issue 2</u> – Inadequacies in funding for infrastructure result from a lack of strategic focus in exploring wider mechanisms, such as increases in land values, which result from investment in infrastructure and from development.</i></p> <p><i><u>Issue 3</u> – There needs to be greater clarity on the circumstances within which the UK Government and its agencies can be a source of capital funding for FCERM in Wales.</i></p> <p><i><u>Issue 4</u> - Local authority capacity to progress and fund schemes can limit the pipeline.</i></p>	<p>Proposal 1 – Prepare a Capital Funding Action Plan to support the following:</p> <ul style="list-style-type: none"> • The Programme for Government commitment up to 2026; • The Five to Ten Year Pipeline (Measure 22); • The Long Term Investment Requirements reports (LTIR) (Measure 23). <p>This action plan would need to include the following, together with the actions listed below:</p> <ul style="list-style-type: none"> - Use of established WG and LA funding sources; - Mechanisms for cross-departmental collaboration on scheme funding within WG, NRW, local authorities, water and sewerage companies (WaSCs) and with the UK Government (see Proposal 7); - Use of partnership funding, under the guidance of the proposed Partnership Action Plan (see Proposal 5); - Securing new funding from currently available mechanisms, including for example , business rates, and National Lottery Community and Heritage Fund; - A communications plan to strengthen public and stakeholder support for investment in FCERM. <p>This action plan should be informed by:</p> <ul style="list-style-type: none"> - A review of schemes which have not progressed, or have been delayed, due to the LA being unable to find their financial contribution, to understand the reasons for these difficulties. 	<p>Lead Agency – WG Water & Flood Division & Finance Division Supporting partners – WLGA, NRW, WaSCs, FCEC & UK Government.</p>
	<p>Action A1.1 A review to be undertaken of the case for utilising powers to raise local levies for FCERM under Section 17 of the Flood and Water Management Act.</p>	<p>Lead Agency - NRW</p>
	<p>Action A1.2 A review to be undertaken of potential mechanisms for securing investment in assets not in Risk Management Authority (RMA) ownership.</p>	<p>Lead Agency - FCEC (Policy & Legislation Sub-</p>

	<p>Action A1.3 A review to be undertaken of longer term infrastructure funding mechanisms, such as how to capture the increase in land values which arises from public investment, and recycle it into infrastructure funding;</p>	<p>Committee). Lead Agency – WG Finance Division Supporting partner - National Infrastructure Commission for Wales.</p>
	<p>Action A1.4 Develop systems by which Long Term Investment Requirements reports are updated on a regular frequency.</p>	<p>Lead Agency – NRW.</p>
<p>1.1.1 The Case for Proposal 1 The first of the LTIR reports, to be published later in 2022, will help to quantify the overall future capital funding requirements for FCERM. Later phases will incorporate other elements of investment needs, including maintenance and non-structural requirements.</p> <p>Over the 5 years of the current Senedd term, the Welsh Programme for Government sets a target of additional flood protection for more than 45,000 homes. This is complemented by a new ten year Wales Infrastructure Investment Strategy. Measure 22 of the National Strategy commits WG to developing a five to ten year investment programme pipeline, which will help to evidence future funding requirements. With NRW capital schemes 100% funded by WG, and Local Authority (LA) schemes 85% funded, this pipeline will enable both WG and LAs to project future capital requirements, including the use of LAs’ prudential borrowing powers. The Capital Funding Action Plan can then be developed to match requirements with capital funding sources. The longer term pipeline will provide the opportunity to identify wider beneficiaries, and mechanisms for securing funding contributions.</p> <p>This proposal is about funding for all capital investment, which is not just flood defence schemes, but all assets and infrastructure, including hydrometry, telemetry and ICT systems.</p> <p>1.1.2 The National Strategy Proposal 1 will contribute to the delivery of Measures 22 and 23, and towards achieving Objectives C and D.</p> <p>1.1.3 Evidence in Support of Proposal 1 1.1.3.1 <i>Coastal Flood and Erosion Risk Management in Wales – Auditor General for Wales, Jul 2016</i>; www.audit.wales/system/files/publications/Coastal-flooding-eng_0.pdf 1.1.3.2 <i>Future Funding of Flood and Coastal Erosion Risk Management in Wales - Interim report for the Minister for Natural Resources and Food, WG - Flood</i></p>		

Risk Management Wales, Mar 2013.

1.1.3.3 Response to call for input from the Wales Flood and Coastal Erosion Committee – Royal Town Planning Institute,(RTPI) November 2020

1.1.3.4 Wales Infrastructure Investment Strategy - WG, December 2021 www.gov.wales/wales-infrastructure-investment-strategy-2021

1.2 Medium to Long Term Funding Mechanisms

Issue 5 – Funding for schemes is guaranteed only on an annual basis, placing limitations on RMA’s ability to achieve the support and match-funding required for schemes seeking WG funding in the medium to long term pipeline, and importantly to recruit and retain effective teams.

Proposal 2 - Continue to press the case for rolling, flexible multiple year programmes with allocations of both capital and revenue funding.

Lead Agency – WG Water & Flood Division
Supporting partners – WG Finance Division, WLGA NRW, FCEC.

1.2.1 The Case for Proposal 2

WG require a pipeline of work to justify longer term funding, and this is already being progressed by WG under Measure 22. High level data of future schemes required is being collated from Local Authorities to set out evidence for a pipeline of schemes, to evidence the need for multi-year funding. The FCEC has written to Welsh Ministers to set out the case. Multi Year flexible funding streams are however not yet in place, and so further support and evidence is needed to achieve this.

1.2.2 The National Strategy

Proposal 2 will contribute towards Measure 22.

1.2.3 Evidence in Support of Proposal 2

Letter from FCEC chair in October 2020 to Welsh Ministers expressing the support of the FCEC to multi-year funding. Response letter in December 2020 confirmed WG support for a multi-year approach, although it could not be achieved for 2021-2022. The letter stated that:

“Whilst at this time we cannot confirm multi-year budget settlements for flood and coastal risk management, I am keen to explore how we might move towards this in future. To support this I am looking to our Risk Management Authorities to develop a longer term pipeline of schemes. Such a pipeline will help inform us of when funding is required over the next 10 years (and beyond) so we can plan intelligently and look to match our funding to demand, as well as reducing risk of underspend. A stronger pipeline will also strengthen the argument for both multi-year capital and revenue settlements looking ahead. This is one of the measures I included within the recently published National Strategy and I know the Flood and Coastal Erosion Committee are already looking at how best to support our Risk Management Authorities in bringing this together through its Sub-Group on Resources.”

Since the letter, the pipeline has been progressed, and a 3 year draft FCERM budget was allocated in December 2021. This represents a critical step forward. However, there is a need to progress to arrangements where the 3 year budget rolls forward annually, and to remove the current inflexibility between financial years.

1.3 The Planning System

Issue 6 – Better integration is needed between FCERM and the planning system, so that proposals for new development contribute to resilience to flooding and coastal change, and that the need to incur capital expenditure in protecting ever more properties is avoided.

Proposal 3 - Develop policy and guidance in support of Future Wales, The National Plan 2040 and Planning Policy Wales, to secure better integration between authorities responsible for planning, flood and coastal erosion risk management and regeneration. This would apply in the preparation of regeneration strategies and development plans, in the determination of planning applications and in the enforcement of planning controls. This proposal would ensure that, where significant flood and erosion risks are present, inappropriate development is avoided, and in all other cases, proposals for new development and redevelopment are assessed on their role in contributing to resilience to flooding and coastal change.

Specific measures should include:

- Bringing the new TAN15 into effect,
- Enhancing the status of Lead Local Flood Authorities (LLFAs) as consultees on planning matters, and giving greater weight to Shoreline Management Plans;
- Providing better training for all who contribute to decision-making in the planning system on FCERM, and for FCERM practitioners on planning ;
- Making better use of, and ensuring appropriate outcomes from, Welsh Government powers of call-in and direction;
- Ensuring that Corporate Joint Committees are given appropriate advice on preparing Strategic Development Plans (SDPs), on consultation arrangements with LLFAs, and on the interface between SDPs and FCERM plans and strategies;
- Ensuring that regeneration programmes give due weight to FCERM;
- Ensuring that planning performance indicators effectively measure FCERM outcomes, and that reporting is mandatory;
- Monitoring the effectiveness of planning policy and guidance as it relates to

Lead Agency - WG Planning Division
Supporting Partners – LAs as LLFAs and LPAs, & NRW.

	<p>FCERM;</p> <ul style="list-style-type: none"> Reviewing the Use Classes and General Permitted Development Orders, and TAN 12 on design, to ensure that these are consistent with the National Strategy. 	
<p><i>Issue 7 – Significant reductions in the capacity of local planning authorities are constraining their ability to secure contributions from developers towards FCERM and wider climate action goals.</i></p>	<p>Proposal 4 - Develop mechanisms by which well resourced, plan-led planning services can deliver wider sustainable development and climate action goals, including those which will facilitate funding for FCERM.</p> <p><u>Specific measures should include:</u></p> <ul style="list-style-type: none"> Ensuring that planning fees are retained by local planning authority (LPA) services; Ensuring that planning fees properly reflect the costs of development management services; Ensuring that all other aspects of LPA responsibilities are adequately resourced; Ensuring that appropriate frameworks are in place to facilitate collaboration between LPAs. 	<p>Lead Agency - WG Planning Division</p> <p>Supporting Partners – WG Water & Flood Division, LAs as LLFAs and LPAs, & NRW.</p>
<p>1.3.1 The Case for Proposals 3 & 4</p> <p>The Planning System has a critical role to play in delivering the National FCERM Strategy. While the data is incomplete, indications are that from very low levels in 2014-15 and 2015-16, residential consents within flood zones increased dramatically in 2016-17 and 2017-18. (NRW Section 18 Report 2019 – FCEC Report September 2019).</p> <p>1.3.2 The National Strategy:</p> <p>Proposals 3 & 4 will contribute to Objective D.</p> <p>1.3.3 Evidence in Support of Proposals 3 & 4</p> <p>1.3.3.1 <i>Future Funding of Flood and Coastal Erosion Risk Management in Wales - Interim report for the Minister for Natural Resources and Food, WG - Flood Risk Management Wales, March 2013.</i></p> <p>1.3.3.2 <i>Response to call for input from the Wales Flood and Coastal Erosion Committee – RTPI; November 2020</i></p> <p>1.3.3.3 <i>Flooding in Wales – Report of the Senedd Climate Change, Environment and Rural Affairs Committee December 2020, and Response by the Minister for Environment, Energy and Rural Affairs, January 2021. https://business.senedd.wales/documents/s112228/Letter%20and%20response.pdf</i></p> <p>1.3.3.4 <i>Inquiry into the Effectiveness of Local Planning Authorities in Wales, WAO, Senedd, WG, 2019/20. www.audit.wales/publication/effectiveness-local-planning-authorities-wales</i></p> <p>1.3.3.5 <i>Amendments to Permitted Development Rights, RTPI, February 2022 www.rtpi.org.uk/consultations/2022/february/amendments-to-permitted-development-rights/</i></p>		

1.3.3.6 *Measuring What Matters: Planning Outcomes Research*, RTPI, November 2020. www.rtpi.org.uk/research/2020/november/measuring-what-matters-planning-outcomes-research/

<u>2. Partnerships</u>		
2.1 Partnership Funding – Policy / Strategy / Mechanisms		
<p><i>Issue 8 Efforts to secure partnership funding contributions are likely to have limited success in the absence of an effective strategy to guide them.</i></p> <p><i>Issue 9 – The pipeline needs to be aligned with other funding streams such as Water Company Asset Management Plans, City and Regional Growth Deals, Network Rail Asset Management Plans, Forestry and Agriculture to maximise partnership opportunities.</i></p> <p><i>Issue 10 - Prioritisation methods within the pipeline must be carefully considered, as they will impact upon the overall value for money able to be achieved from the programme and ability to achieve wider benefits and partnership funding.</i></p>	<p><u>Proposal 5 - Develop a Partnerships Action Plan which would need to include:</u></p> <ul style="list-style-type: none"> - Developing a framework at national and local levels for engaging with prospective partner organisations and securing funding contributions; this would need to incorporate diverse sectors, including cross government sources (Proposal 7) infrastructure providers, utilities, agriculture, forestry, businesses, landowners, developers (Proposals 6 & 8), communities and third sector organisations (Proposal 16, Action A16.4); - Determining the roles of key players, including WG departments, NRW, regional groups and LAs, including their roles as LPAs, and the guidance needed to support them; - Setting out governance arrangements; - Identifying potential funding sources, timescales and mechanisms for assessing funding capacity; - Putting in place the skills and capacity required; - Integrating partnership funding with pipeline planning and clarifying its definition; - Developing proposals for mitigating the risks involved with partnership funding, including those of disadvantaging deprived areas, and lack of transparency; - Developing and piloting a measurement tool to support prioritisation and enable objective comparison of schemes, such as a partnership funding calculator. <p><u>Such a Strategy will also need to consider:</u></p> <ul style="list-style-type: none"> - Enabling wider beneficiaries to influence scheme development and design; - Recognising business and infrastructure owner benefits and wider societal benefits in outcome measures; 	<p>Lead Agency - WG Water & Flood Division & FCEC</p> <p>Supporting partners: WG Finance Division, NRW, WLGA.</p>

2.1.1 The Case for Proposal 5

In recognising that capital funding needs to grow, it is important that all potential sources of funding play their part. There are many beneficiaries of FCERM schemes who will see the value of their assets grow where schemes are undertaken. Where it has been secured, partnership funding has proved able to increase the amount of investment in FCERM and the number of schemes delivered.

2.1.2 The National Strategy

Proposal 6 will contribute to the delivery of Measure 24.

2.1.3 Evidence in Support of Proposal 5

2.1.3.1 *Call for Evidence on Flooding and Coastal Erosion Policy – Summary of Responses; Defra, Jul 2020*

assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/899462/flooding-coastal-erosion-call-for-evidence-summary-of-responses.pdf

2.1.3.2 *Coastal Flood and Erosion Risk Management in Wales – Auditor General for Wales, Jul 2016; www.audit.wales/system/files/publications/Coastal-flooding-eng_0.pdf*

2.1.3.3 *Further evaluation of partnership funding - Final report – Defra, Nov 2018; www.rpaltd.co.uk/uploads/report_files/further-evaluation-of-partnership-funding.pdf#*

2.1.3.4 *Evaluation - Final report – Defra, Apr 2014;*

<http://sciencesearch.defra.gov.uk/Default.aspx?Module=More&Location=None&ProjectID=18734>

2.1.3.5 *Operational principles to follow when setting up funding partnerships to tackle flood and coastal erosion – EA, Apr 2020.*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/879973/Operational_Principles_for_FCERM_funding_partnerships.pdf

2.1.3.6 Alexander, M., McKinley, E. and Ballinger, R. (2019) *Aligning Flood & Coastal Erosion Risk Management and Well-being in Wales: An analysis and evaluation of FCERM governance www.pml.ac.uk/getattachment/CoastWeb/Outputs/Evaluation_FCERM_governance_Wales_Final_Report_Nov2019.pdf*

2.1.3.7 Thaler, T. and Priest, S. (2016) 'Partnership Funding in flood risk management: multi-level stakeholder engagement – a question of roles and power', E3S web of conferences, 7, p. 20009. doi: 10.1051/e3sconf/20160720009. [Thaler and Priest Partnership funding in flood risk management Area_postprint.pdf \(mdx.ac.uk\)](#)

2.1.3.8 [Understanding effectiveness of flood and coastal erosion risk governance in England and Wales - GOV.UK \(www.gov.uk\)](#); FCERM Joint Research & Development Programme; Nov 2021.

2.2 Partnership Funding - Developers

<p><i>Issue 11 - Collaboration with planning authorities at all levels will be needed to secure partnership funding for FCERM from developers, where sites for redevelopment would benefit from schemes to strengthen flood defences.</i></p>	<p>Proposal 6 - Ensure that planning policies at appropriate levels require FCERM benefits to be secured from new development, including the use of Community Infrastructure Levy (CIL) and Section 106 agreements, and that these policies are being effectively implemented. The proposal by the Welsh Government to commission further research into the general effectiveness of these mechanisms should specifically address their roles in securing FCERM benefits.</p>	<p>Lead Agency - WG Planning Division Supporting Partners – LAs as LLFAs and LPAs, NRW & FCEC.</p>
<p>2.2.1 The Case for Proposal 6 Future Wales (Policy 8) makes it clear that WG will work with RMAs to plan and invest in new and improved FCERM infrastructure. It recognises that parts of National Growth Areas are susceptible to flooding. While in these areas, development on previously undeveloped land will not be acceptable, any redevelopment may require existing defences to be improved. In some circumstances, development may be permitted subject to appropriate mitigation measures or improvements to existing flood defence infrastructure to manage the risk of flooding. Developers should normally be expected to bear the costs of necessary mitigation, construction and long term maintenance. Planning authorities should, where necessary, require developers to contribute financially via the CIL or enter into an agreement under Section 106 of the Town and Country Planning Act 1990 to ensure the infrastructure improvements can be provided. It will be important that these considerations are reflected by Corporate Joint Committees in the preparation of SDPs, by LPAs in updating their LDPs, and in decisions on planning applications.</p> <p>2.2.2 The National Strategy: Proposal 7 will help to deliver the ambitions of paras 251 to 253 and, in furthering Measure 17, will contribute to Objectives B and D.</p> <p>2.2.3 Evidence in Support of Proposal 6 2.2.3.1 <i>Future Funding of Flood and Coastal Erosion Risk Management in Wales - Interim report for the Minister for Natural Resources and Food, WG - Flood Risk Management Wales, Mar 2013.</i> 2.2.3.2 <i>Response to call for input from the Wales Flood and Coastal Erosion Committee - RTPI, November 2020.</i></p>		
<p>2.3 Co-ordinating Government Programmes and Achieving Wider Benefits</p>		
<p><i>Issue 12 - The ability to develop a pipeline of schemes which can deliver benefits more widely than FCERM alone, and can access partnership</i></p>	<p>Proposal 7 - Develop better frameworks and strategies within RMAs/ WG to leverage partnership funding from cross-government sources.</p>	<p>Lead Agency - WG Water & Flood Division</p>

<p><i>resources more widely, is constrained by a lack of appropriate cross-cutting frameworks within government at national and local levels, and a focus on property numbers. These constraints particularly inhibit approaches to coastal adaptation and multi-functional schemes.</i></p>	<ul style="list-style-type: none"> - Inform frameworks by first collating information through the development of the Five to Ten Year Pipeline on key wider benefits which could be considered and which departments within WG, NRW and LAs would be relevant to these, such as regeneration, transport, housing, agriculture, forestry, water and environment. - Take into account recent legislation and government priorities such as current emphasis on climate change, resilience, community cohesion and wider Welsh Government well being goals. 	<p>&WLGA Supporting Partners WG, NRW, LAs, FCEC.</p>
<p>2.3.1 The Case for Proposal 7 To achieve wider benefits on schemes is much more achievable with input and support from cross-government sources. To date this has proved difficult due to barriers between funding streams and a lack of co-ordination in determining priorities. Identifying wider benefit potential early, and collaboration over priorities, will support the development of schemes which can benefit, and attract funding from, other departments. Working together in this way can achieve much greater value for money.</p> <p>2.3.2 The National Strategy Proposal 7 will contribute towards Measure 24.</p> <p>2.3.3 Evidence in Support of Proposal 7 2.3.3.1 Alexander, M., McKinley, E. and Ballinger, R. (2019) <i>Aligning Flood & Coastal Erosion Risk Management and Well-being in Wales: An analysis and evaluation of FCERM governance</i> www.pml.ac.uk/getattachment/CoastWeb/Outputs/Evaluation_FCERM_governance_Wales_Final_Report_Nov2019.pdf 2.3.3.2 National Strategy Consultation Responses.</p>		
<p>2.4 Optimising the use of Capital & Partnership Funding for Catchment & Coastal Zone Approaches</p>		
<p><i>Issue 13 - Current approaches to scheme development (scheme-by-scheme, local level) rarely facilitate whole catchment / coastal zone approaches to FCERM. Solutions to manage flood risk need to involve a wider range of partners at a broader scale to be fully effective.</i></p>	<p>Proposal 8 - Review what actions need to be taken to support RMAs in adopting catchment / coastal zone based approaches to scheme development, in particular in considering upper catchment land use, and wider coastal infrastructure. While programme business cases are encouraged to adopt a wider catchment and coastal zone approach through the Grant Memorandum, only limited use is currently made of this facility. Integrated approaches are needed, including agricultural policy and funding, and infrastructure programmes (see Proposal 7).</p>	<p>Lead Agency – NRW / WLGA Supporting partners – WG Agriculture Division, LAs, WCGF.</p>

2.4.1 The Case for Proposal 8

Catchment-based approaches and programme business cases with multiple schemes across RMAs are promoted in the National Strategy and are eligible for funding. The potential of Natural Flood Management (NFM) combined with new approaches to agricultural funding place greater emphasis on strategic, catchment-based approaches. Strategic Flood Consequence Assessments to inform Development Plans should be prepared on a catchment basis. Although proposals are in development for catchment approaches, there remains scope to expand this to ensure options such as the use and management of upper catchment land, NFM, and links to agricultural policies and funding are well utilised. These measures have the potential to reduce flood risk and to bring environmental and biodiversity benefits such as decarbonisation, improved water quality and habitat creation.

2.4.2 The National Strategy

Proposal 8 will help to deliver the ambitions of paras 226-228 and Figure 14.

2.4.3 Evidence in Support of Proposal 8

Flood and Coastal Erosion Committee responses to consultations on TAN 15, and to the Agriculture Wales White Paper 2020.

3. Revenue Funding

3.1 Levels of Short and Long Term Revenue Funding

Issue 14 Shortages in revenue funding have had a material impact on levels of flood risk.

Issue 15 Revenue funding is in competition with other pulls on public budgets.

Issue 16 There are wide variations in (internal) revenue allocations for FCERM work by LAs.

Issue 17 Perceptions that revenue is mainly required for maintenance have constrained funding for other important FCERM activities.

Issue 18 Pressure on revenue budgets from historic under-funding will increase due to climate change impacts and increased assets stock. There is a need to build the economic case for revenue investment.

Issue 19 There has been an imbalance between capital and revenue funding.

Proposal 9 – Prepare a Revenue Funding Action Plan (complementary to the Capital Funding Action Plan proposed under 1.1) to:

- Understand the revenue requirements, including those emerging from the Long Term Investment Requirements (LTIR) work (National Strategy Measure 23)
- Identify possible sources of revenue funding (see **Action 9.1**)
- Propose mechanisms for longer term budget allocations (see **Action 9.2**)
- Where there are capital investments, propose mechanisms for linked revenue allocations for operation and maintenance (see **Action 9.3**)

The majority of FCERM activities are revenue funded, and the scope of the Action Plan should be all revenue funded activities. The LTIR work led by NRW will initially report on capital requirements (later in 2022). Understanding long-term revenue requirements will be an important step, but will come in later stages, as the methodologies for these elements remain to be developed.

Lead Agency – WG

Supporting Partners – NRW, LAs, all RMAs.

3.1.1 The Case for Proposal 9

A Revenue Funding Action Plan is needed as revenue budgets fund the majority of FCERM activities, including the staff and non-staff costs associated with operation and maintenance work for all FCERM field assets (e.g. flood defences, hydrometry stations and telemetry infrastructure); operation and maintenance of FCERM digital assets (e.g. flood models and maps, web-based services, ICT enabling systems); and delivery of key non-capital services (e.g. flood forecasting and warning, hydrological services, flood awareness and community engagement work, flood incident response; planning liaison and development control; strategic flood planning and climate change adaptation work).

Understanding and addressing the revenue investment requirements over as long a time window as possible will enable maximisation of outcomes and efficient planning and delivery. The LTIR work is a key element of understanding the requirements. The first LTIR report, to be published later in 2022, will be an important evidence base. It can quantify operation and maintenance of field assets where the data exists, but methodologies for other revenue funded activities do not yet exist and will need to be developed in later stages of LTIR. The complete revenue requirements picture will need to be built up

over time.

As well as understanding the requirements, there is a need to maximise the sources of revenue funding (Action 9.1), to enable mechanisms for long term planning (Action 9.2), and to make effective links between capital investment and revenue requirements (Action 9.3). These need to be part of the overall Revenue Funding Action Plan so that the overall requirements and sources of funding are considered together.

3.1.2 The National Strategy

The development of LTIR is Measure 23 and so there is a direct link. Proposal 9 can also contribute to Measure 22, in the sense of building a picture of the longer term investment requirements for non-capital interventions. Proposal 9 will contribute to all of the objectives of the Strategy, as they all require revenue funded activity.

3.1.3 Evidence in Support of Proposal 9

3.1.3.1 *Coastal Flood and Erosion Risk Management in Wales – Auditor General for Wales, Jul 2016; www.audit.wales/system/files/publications/Coastal-flooding-eng_0.pdf*

3.1.3.2 *Coastal Flood and Erosion Risk Management in Wales – National Assembly for Wales, Jun 2017; <https://senedd.wales/laid%20documents/cr-ld11073/cr-ld11073-e.pdf>*

3.1.3.3 *Wales Coastal Flooding Review - Project 7 Part A Report Recommendation 37 Skills & Capacity Audit, Dec 2015; <https://cdn.naturalresources.wales/media/679728/project-7-report-part-a-recommendation-37.pdf?mode=pad>*

3.1.3.4 *National Audit Office – Managing Flood Risk (England), Defra, 2020 www.nao.org.uk/wp-content/uploads/2020/11/Managing-flood-risk.pdf*

3.1.3.5 *Flood Risk Management Wales: Future Funding of Flood and Coastal Erosion Risk Management in Wales, Interim report for the Minister for Natural Resources and Food, WG, Mar 2013*

3.1.3.6 *Aligning Flood & Coastal Erosion Risk Management and Well-being in Wales: An analysis and evaluation of FCERM governance Meghan Alexander, Emma McKinley & Rhoda Ballinger Cardiff University, Nov 2019;*

www.pml.ac.uk/getattachment/CoastWeb/Outputs/Evaluation_FCERM_governance_Wales_Final_Report_Nov2019.pdf

www.pml.ac.uk/getattachment/CoastWeb/Outputs/Policy_Brief_FCERM_governance_in_Wales_Nov2019.pdf

3.1.3.7 *February 2020 Flood Review: Flood Incident Management, Oct 2020, Natural Resources Wales [February 2020 Floods in Wales: Flood Incident Management Review \(cyfoethnaturiol.cymru\)](http://www.naturalresources.wales/February-2020-Floods-in-Wales-Flood-Incident-Management-Review)*

3.2 Optimising Sources of Revenue Funding

Issue 20 All potential sources of revenue funding may not be fully maximised – there is a need to explore options.

Action A9.1 - Review all options for sources of revenue funding

To cover: Explore all options and assess viability of each. Explore new options, increase under-utilised options, reduce costs/needs (seek efficiencies), influence

Lead Agency – WG
(commission as a project)

	<p>other stakeholders to contribute.</p> <p>This can include:</p> <ul style="list-style-type: none"> - Increasing the funding through investigating new or under-utilised sources of funding (e.g. NRW to utilise levy-raising powers) - Investigating whether any other organisations (including non-RMAs e.g. - 3rd sector or communities) could undertake any activities that are traditionally WG revenue funded (links to Collaboration workstream). 	Supporting partners: all RMAs.
3.3 Strategic Revenue Planning – Funding over the Longer Term		
<i>Issue 21 Revenue allocations from WG have historically been on a yearly basis which does not enable strategic planning for future flood risk, or effective delivery, or enable efficiencies.</i>	<p>Action A9.2 – Assess mechanisms for long term budget allocations.</p> <p>WG have announced budgets over a 3 year horizon, which is very welcome. This action is to assess whether this can be extended further and/or be established as a rolling budget allocation window, to enable surety of investment to meet the challenges of long term flood risk and climate change adaptation work. The proposed scope is to identify the benefits from strategic programming and planning, and identify the delivery mechanisms.</p>	Lead Agency - WG (commission as a project).
3.4 Linking Revenue Needs to Capital Investment		
<i>Issue 22 There are typically no direct additional allocations to support the operation and maintenance (revenue) requirements from capital investments.</i>	<p>Action A9.3 - Review the evidence for linking capital allocations and revenue (operation and maintenance requirements) and make recommendations for allocation process changes as appropriate.</p> <p>Capital investments, both physical and digital assets, require operation and maintenance and these revenue requirements typically do not mirror the capital investment. Current processes allow for incorporation of whole life costs in capital business cases, and revenue allocations from WG have increased recently. But there are no established mechanisms in place that quantify and allocate the revenue requirements from capital investment. This action should include:</p> <ol style="list-style-type: none"> 1. Gather data on revenue (operation and maintenance) requirements from capital work, including through case studies; 	Lead Agency - WG (commission as a project) Supporting partners: all RMAs.

	<ol style="list-style-type: none">2. Gather evidence on how proper operation and maintenance prolongs life of assets and hence overall costs, and the benefits;3. Assess options for incorporating revenue operation and maintenance allocations into capital projects approvals;4. If appropriate, make recommendations that this is incorporated in funding allocation processes.	
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4. Skills and Capacity		
4.1 Levels of staffing resources, knowledge, skills and technical expertise		
<p><i>Issue 23</i> There is a lack of capacity in FCERM in Wales (including within WG, WLGA, local authorities & NRW). This impacts on the delivery of both the FCERM programme and scheme pipeline, and of Shoreline Management Plans, and ultimately of the National Strategy, and makes the public sector heavily reliant on external consultants.</p> <p><i>Issue 24</i> The level of technical expertise across all bodies varies, and only certain aspects of capital projects can be delivered in-house, reflected in investment in specific software and the training of staff.</p>	<p>Proposal 10 – Create the capacity to lead a programme of FCERM Resource Improvement across Wales as proposed in this report.</p> <p>It has become increasingly evident, while significant extra capital and revenue resources are being deployed to respond to rising levels of flood risk, that these increases are not being sufficiently reflected in resources for the strategic governance, leadership and organisational development associated with FCERM policy and programmes across Wales. There is a need to broaden the role of the FCERM Programme Board, to strengthen the capacity of the organisations represented upon it, to take ownership of the resource improvement agenda, to establish a resource improvement budget, and to report on progress.</p>	<p>Lead Agency – WG Supporting Partners – WLGA, NRW, FCEC.</p>
<p><i>Issue 25</i> Skills and resources are an issue in FCERM in Wales, as well as in other groups such as coastal groups. This also has impacts in terms of workstreams such as community engagement and funding.</p> <p><i>Issue 26</i> There are gaps in knowledge, skills and appropriate tools in responding to climate change, particularly in fields such as coastal modelling and forecasting.</p> <p><i>Issue 27</i> The capacity and capabilities of RMA's to deliver National Strategy Aims, Objectives, & Measures, and to undertake accompanying impact assessments.</p>	<p>Proposal 11 – Establish clear baseline data by commissioning a study to identify RMA's' current capacity and skills, and predicted resource requirements for the future. A core requirement of the study is to propose a model, following consultation with all the bodies involved in FCERM, which maximises efficiency, effectiveness and accountability. In particular the model should provide clear recommendations on practical actions to:</p> <ol style="list-style-type: none"> 1. Address resources challenges at local, regional and national level, to ensure consistency and ability to deliver flood & coastal risk programmes, in a coordinated manner; 2. Enable FCERM bodies to coordinate the use of specialised resources; 3. Enable and promote the re-shaping of processes and service delivery options both nationally and locally and collaboratively to provide value for money; 4. Promote the provision of integrated/shared services; 5. Overcome problems of limited capacity and competencies, addressing concerns around skills shortages; 	<p>Lead Agency – WLGA Supporting Partners – NRW, WG, LAs.</p>

	<p>6. Examine the potential and routes of achieving wider training, development and career path opportunities;</p> <p>7. Enable a more co-ordinated use of the time, skills and expertise of staff .</p> <p>In order to help make this an achievable and realistic action, it is proposed to break the review work into a number of steps (this is on the predication of financial resources being available):</p> <ol style="list-style-type: none"> 1. Stage 1: <ol style="list-style-type: none"> a. Establish a lead body / authority to coordinate the review. b. The lead body will coordinate procurement of a consultant and be the lead authority for commissioning purposes. c. The review will need to understand current practices, ways of working, how staff are currently employed or engaged, funded and trained, levels of skills, and what relationships there are with third party providers of services. d. Information would need to be collected from the participating bodies, either through questionnaires or structured interviews, which would be developed and managed by the consultant service provider. e. The options explored should include those that could be delivered utilising established powers, including the power to collaborate. Mechanisms to be evaluated should include the use of secondments, unified delivery units between RMAs, and regional ways of working. f. The closure of this stage would be a model showing options for the provision of capacity in a way that maximises efficiencies, effectiveness and accountability, with recommendations for a preferred option. 2. Stage 2: Consultation and Action Plans <p>Dependent on the Stage 1 findings and options presented, the next stage will be to:</p> <ol style="list-style-type: none"> i. Ascertain levels of support; ii. Develop and agree an action plan and timetable for achieving aims, including short term and longer term actions; 	
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	3. Stage3: Initiate short term actions.	
4.2 Issues around skilled professionals in FCERM in Wales		
<i>Issue 28 There is concern about the availability of sufficient professionally qualified flood and coastal engineering professionals in Wales, and the education opportunities in Wales in the flood and coastal work area.</i>	Proposal 12 – Establish a Working Group with representatives from the key stakeholders – namely NRW, WG, WLGA, professional institutes and higher education - to develop a coordinated action plan to address education and training opportunities in FCERM in Wales, and the related concerns about skills shortages.	Lead Agency – NRW Supporting Partners – WLGA, WG Water & Flood and Education & Apprenticeship Divisions, LAs.
<p>4.1.1 The Case for Proposals 10, 11 & 12 Review work has underlined concerns at all levels that there is a lack of capacity in FCERM in Wales. This is partly because staff establishments have not kept pace with increasing levels of flood risk, nor with increasing budgets for flood risk programmes. It is also partly because of difficulties, which are expected to persist, in recruiting staff. This lack of capacity is impacting widely on the delivery of FCERM services, and on the ability to respond to increasing levels of need and expectation. Limitations on educational pathways into FCERM practice in Wales severely constrain opportunities to respond to these challenges.</p> <p>4.1.2 The National Strategy This is a true cross cutting issue, which affects a number of the Measures in the National Strategy, specifically highlighting:</p> <ul style="list-style-type: none"> - Measure 5 - To ensure the public and stakeholders are using the most up to date information on flood risk and coastal erosion; - Measures 6 to 8 - To support decision making and reflect reduced risk from investment; - Measure 15 - Want to see Natural Flood Management as an option for every FCERM scheme; - Measure 18 - We need clear advice on coastal adaptation for Risk Management Authorities and communities; - Measure 22 - We want to build a stronger pipeline of FCERM projects reflecting the increasing risk from climate change. <p>4.1.3 Evidence in Support of Proposal 10 to 12 4.1.3.1 <i>Wales Coastal Flooding Review - Project 7 Part A Report Recommendation 37 Skills & Capacity Audit - Dec 2015;</i></p>		

<https://cdn.naturalresources.wales/media/679728/project-7-report-part-a-recommendation-37.pdf?mode=pad>

4.1.3.2 Options for the Management of Flood & Coastal Erosion on a Regional Basis Regional Options - Jul 2018.

www.wlga.wales/SharedFiles/Download.aspx?pageid=62&fileid=2042&mid=665

<p>5. Governance & Collaboration</p>		
<p>5.1 Resourcing of Councils’ FCERM services</p>		
<p><i>Issue 29 FCERM services in the majority of Councils are poorly resourced, as these services lack recognition as a corporate priority.</i></p>	<p>Proposal 13 - Raise the profile of FCERM within councils with a view to encouraging them to increase prioritisation of FCERM services.</p> <p>This could be achieved through:</p> <ul style="list-style-type: none"> - Benchmarking exercise across the 22 councils with feedback for improvement; - Specific training for elected members; - Ongoing engagement with Directors and County Surveyors Society; - Engagement with PSBs to provide a sound understanding of risks and importance of FCERM and climate change (as it stands only 2 PSBs consider climate change); - Joint WLGA/NRW Political and Executive seminars; - WG departments and WLGA should work closer to ensure the importance of investing in FCERM is raised as part of wider climate change work; - Extending the remit of Corporate Joint Committees to include FCERM should also be explored. 	<p>Lead Agency – WLGA</p> <p>Supporting partners – WG, LA Chief Officers, NRW.</p>
<p>5.1.1 The case for Proposal 13</p> <p>Although in some cases resources are proportionate to risks and size of councils, FCERM has historically been under-resourced, leading to a re-active approach to managing flood risks. There is a need to increase resilience and future proofing of FCERM services to pro-actively manage and mitigate increasing flood risks. With Climate Change being at the forefront of new policies and initiatives, the concept of mitigating against climate change is only half the solution, and adaptation and resilience must be heightened to the same level as mitigation, and sold as a ‘whole package’.</p> <p>Although corporate priorities are democratically driven, decision makers and cabinet members are able to improve service prioritisation with already some successful examples taking place. It is therefore paramount to target this audience to ensure that the same level of prioritisation is given to FCERM as it is to meeting net zero targets, and to ensure that councils maximise the opportunities offered by the additional funding from the WG and the 3 years’ budget settlement.</p>		
<p>5.1.2 The National Strategy</p> <p>The Strategy further strengthens WG policies on collaborative working and forward planning (para 4). As such, capacity and investment in Councils’ FCERM services is required to deliver this ambition. Furthermore, there are clear links with Objective A (measures 5; 6 & 7), with Objectives B and C where capacity is required for flood awareness activities and the delivery of capital works, and with Objective D on asset maintenance, shifting from a reactive to a pro-active approach to asset management.</p>		

<p>5.1.3 Evidence in support of Proposal 13 WLGA/NRW Skills & Capacity Audit 2017- Wales Coastal Flooding Review Project 7 Part A Report Recommendation 37 (cyfoethnaturiol.cymru) FCERM agenda is not a featured topic at senior level through the Wales Environment Directors Forum or the County Surveyor Society Wales. The only platform is through the Regional Flood Groups attended by lower grade officers who lack delegated powers to make corporate decisions.</p>		
<p>5.2 Limited collaboration amongst Risk Management Authorities</p>		
<p><i>Issue 30 Although collaboration between RMAs is a statutory duty, current approaches to collaboration are ad-hoc, and lack clear expectations in terms of what should be delivered. The skills & expertise amongst RMAs could be used to deliver FCERM more effectively.</i></p>	<p>Proposal 14 - Review the effectiveness of current groups to strengthen governance and collaboration arrangements. There is a need to identify where in FCERM collaboration is critical and what level of collaboration is necessary to ensure effective delivery. This approach will enable a better understanding of priorities, resources and ways of working to ensure that suitable and realistic standards for collaboration are created. This can then be transposed into specific protocols which will be embedded as part of various groups Terms of Reference (ToRs) once the following stages are completed:</p> <ul style="list-style-type: none"> - Peer review of Regional and Coastal Groups, Wales Flood Group, Wales Coastal Groups Forum; - Review of their ToRs, aims and objectives; - Identification of good practice and blockers to collaboration; - Review of internal and external communication channels; - Review the governance arrangements around these groups to embed cross collaboration and cohesion as well. 	<p>Lead Agency – Independent and Impartial Resource Supporting partners – WLGA, FCEC, LAs, NRW, WaSCs, WG.</p>

<p><i>Issue 31 There may be opportunities for RMAs and the 'FCERM community' to better share or utilise resources or tasks</i></p>	<p>Proposal 15 - Review barriers to collaboration, and explore opportunities to maximise collaboration via alternative footprints which would identify common objectives, and potential areas for sharing of resources. This could be achieved through:</p> <ul style="list-style-type: none"> - Use of the National Strategy and Net Zero Wales Plan as the framework for engagement - Senior management in RMAs meeting regularly to agree priorities (in line with above plans so FCERM is part of a wider agenda that can further enhance value, reduce isolated work, and encourage broader buy-in). - Identify relevant external partners to support the delivery of these priorities - Identify areas that lend themselves to sharing of resources and development of plans to drive joint delivery through sharing of resources and tasks <p>Ultimately this option like many others will form part of the puzzle and closely linked to other work streams like Capacity and Skills, and revenue funding.</p>	<p>Lead Agency – RMAs, WG Supporting partners – WLGA; other relevant stakeholders in FCERM work, such as universities, & consultants.</p>
<p>5.2.1 The case for Proposals 14 & 15</p> <p>The current lack of resources, differing corporate priorities, and lack of regular senior engagement between RMAs, means that good examples of collaboration with measurable outcomes are few and far between. Existing groups should offer the best platform to enhance and define collaboration needs but they only cover operational activities. They lack a focus on delivering collaboration, and they do not fill the gap around the lack of strategic governance.</p> <p>Collaboration is a resource hungry activity and the demands put on officers limit their ability to drive and improve strategic collaboration pro-actively. This superficial collaboration will, in turn lead to poor communication and a poor understanding of each other's priorities, roles, and responsibilities. By improving collaboration and communication we are likely to see an improvement around clarity of roles and responsibilities and more opportunities to drive activities on a wider scale. These Proposals will support Proposal 8 in seeking to deliver more catchment coastal zone based approaches.</p> <p>5.2.2 The National Strategy</p> <p>Proposals 14 & 15 will contribute to the delivery of Measure 23 Paras 139 to 156 of the Strategy strengthen WG policies on collaborative working and expectations of better collaboration between RMAs, especially LAs, NRW, and WaSCs. Lack of clarity around roles and responsibilities in some areas is being addressed by the FCEC Policy & Legislation Sub-Committee under Measure 1, and this will add support to Proposals 14 & 15.</p> <p>5.2.3 Evidence in support of Proposals 14 & 15</p> <p>Understanding effective flood and coastal erosion risk governance in England and Wales - GOV.UK (www.gov.uk); FCERM Joint Research & Development Programme; November 2021.</p>		

<u>6. Community Engagement</u>		
6.1 Levels of engagement with communities		
<p><i><u>Issue 32</u> Community engagement in FCERM is complex and demanding, and current approaches are often under-resourced, resulting in:</i></p> <p><i>i) Levels of communication with, and information for, communities often considered to be insufficient;</i></p> <p><i>ii) Difficult conversations about the feasibility of defending property often being delayed;</i></p> <p><i>iii) Raised expectations, frustration and low levels of preparedness; and</i></p> <p><i>iv) The potential for working with other sectors, networks and services rarely being maximised.</i></p> <p><i><u>Issue 33</u> Alternative, creative, and participatory approaches to community engagement are often underutilised or poorly understood by RMAs, resulting in opportunities rarely being taken to tailor approaches to different social profiles and place based needs. In order to foster understanding and to encourage collective ownership.</i></p> <p><i><u>Issue 34</u> The potential the voluntary third sector to be involved is not fully harnessed, including the roles of the National Flood Forum in long term strategic partnerships.</i></p>	<p>Proposal 16 – Prepare a Communities Action Plan to prioritise raising levels of community resilience, in order to further understand and foster capacity for a collaborative and participatory approach in FCERM.</p>	<p>Lead Agency – WG Supporting Partners – NRW, LAs, WCGF, Third Sector, FCEC.</p>
	<p>Action A16.1 - Sustain, at the national level, conversations with communities in the public arena - to achieve a broader framing on risk, resilience and adaptation, in order to underpin localised action on community engagement and participation.</p>	<p>Lead Agency – WG Supporting Partners – NRW, LAs, WCGF, Third Sector, FCEC.</p>
	<p>Action A16.2 - Undertake a review (commissioning research where necessary) to increase understanding and inform best practice in community engagement to underpin mechanisms and resource requirements for the Action Plan:</p> <ul style="list-style-type: none"> • To better understand the challenges to flood risk reduction and adaptive behaviours, including uneven social profiles of those at risk (including those digitally left behind); and • To explore approaches that are tailored and better targeted to such challenges and diverse needs, including new forms of communication and participatory processes such as citizen science and co-production of knowledge (including with schools and youth groups). 	<p>Lead Agency – WG (to commission as a project) Supporting partners – NRW, FCEC, RMAs, Third Sector.</p>

	<p>Action A16.3 – Commission an Innovation Programme to pilot local actions, in order to build community capacity in responding and recovering from flood events and coastal erosion.</p>	<p>Lead Agency – WG (to commission as project) Supporting partners – NRW, RMAs.</p>
	<p>Action A16.4 – Explore enabling structures and resources for partnership working with the voluntary sector:</p> <ul style="list-style-type: none"> • Research to evaluate best practice partnerships and pilot projects, and by learning from other relevant initiatives (Wales Community Resilience) and sectors (e.g. welfare); • Transfer of best practice, e.g. from Scotland, the potential role of a WG funded Flood Forum (Wales) officer or project manager. 	<p>Lead Agency – WG (to commission as project) Supporting partners – NRW, RMAs, FCEC, Third Sector.</p>
<p>6.1.1 The Case for Proposal 16</p> <p>The National Strategy recognises that it is not always possible to protect all areas from flooding or coastal erosion, also that there will always be a residual risk that flood defences alone cannot address. The Strategy also stresses that the community response and recovery to flooding can be improved greatly if they are aware of the risks, prepared for the event and understand what practical actions they can take. However, research documents the complexities of communicating risk as a social process, being influenced not only by the form and comprehensibility of information and mode of delivery, but also the characteristics and social profile of the community (Walking and Haworth, 2020). Of particular concern, research highlights inequalities in the distribution of flood risk in Wales, including that working classes that are more likely to experience high flood risk, but are also associated with low awareness of risk (Fielding, 2017; 2012; 2007). Differences in culture and language bestow particular vulnerability on communities (Fielding, 2018). Evidence also suggests RMAs are not having difficult conversations on adaptation, nor are they able to manage unrealistic expectations on how flooding can be prevented through defences. This leads to frustration and undermines the ability of the community to recognise their vulnerability to flooding and take preparedness actions (Devitt and O’Neill, 2017). The National Strategy emphasises that all RMAs have a part to play in improving support to communities before, during and after a flood, Furthermore, improvements to community engagement have been called for in Wales that embrace participatory, creative methods (Alexander, 2021). Further research has been proposed to explore approaches to diversify the engagement ‘toolkit’, and how these may be tailored to suit different needs (Alexander et al., 2019). There is a need to review evidence on ‘what works’ to maximise the use of resources. Addressing these issues is strongly related to the need to strengthen human resources and expertise and skilled staff to deal with complex issues (see sections 3 & 4).</p>		

The voluntary sector has been recognised as a key partner in building a ‘better Wales’ since the founding of the National Assembly, immediately setting out to ‘harness the special contribution’ from Voluntary Organisations (VOs) (Chaney, 2002). VOs can bring significant strengths to the delivery of public services, with their knowledge of community groups, flexibility and ability to innovate. The sector has expertise in mobilizing volunteers and charitable resources. The National Strategy recognises that voluntary organisations have a role to play in improving community resilience. Whilst FCERM emergency management in Wales is thought to be a strength of the system, an area of improvement is seen as better voluntary sector involvement in emergency recovery (Alexander et al., 2019, p85). As well as community capacity building, the role of VOs in trust relations and as broker across RMA and community boundaries is also recognised. Yet as with the UK more broadly, state/voluntary sector relationships have mainly been formed in a social welfare context, and the environmental voluntary sector historically lags behind the welfare domain in their engagement with authorities (Potter and Jacklin-Jarvis, 2018). To date national level arrangements between NRW the voluntary sector remain *ad hoc*, with formal relationships and funding lying beyond the capabilities of small organisations in local communities. There has been a low level of engagement between LLFAs and the voluntary sector. Research UK evidence describes the effects of austerity on the support provided to community activities, yet paradoxically austerity (and latterly the pandemic) have put further pressure on VOs to ‘pick up the pieces’ (Harris, 2018 in Potter and Jacklin-Jarvis, 2018). Hence enabling structures and procedures cannot be underestimated, including for example, the catalysing role of a project manager (Best and Myers, 2019, p205). Local Authorities have raised the idea of a centrally funded officer working regionally or nationally to ‘help start the ball rolling’ in key areas. FCERM authorities in Scotland carry out ‘Community Resilience’ activities, working closely with the Scottish Flood Forum, which is mainly funded by the Scottish Government.

6.1.2 The National Strategy

Proposal 16 will contribute to the delivery of paras 52, 104, 195, 199-200, 208-212, 215, 218, 233, 260, 264-265. The proposal also links to Measure 18 (The Welsh Government to work with the Coastal Groups and NRW to develop further guidance on coastal adaptation by 2022).

6.1.3 Evidence in Support of Proposal 16

6.1.3.1 Alexander, M., McKinley, E. and Ballinger, R. (2019) Aligning Flood & Coastal Erosion Risk Management and Well-being in Wales: An analysis and evaluation of FCERM governance www.pml.ac.uk/getattachment/CoastWeb/Outputs/Evaluation_FCERM_governance_Wales_Final_Report_Nov2019.pdf

6.1.3.2 Arthog Community Council and Fairbourne Project Board *Response to call for input from the Wales Flood and Coastal Erosion Committee, Oct 2020.*

6.1.3.3 Devitt, C. and O’Neill, E. (2017) The framing of two major flood episodes in the Irish print news media: Implications for societal adaptation to living with flood risk’, *Public understanding of science*, 26(7), pp. 872–888.

6.1.3.4 Elster Jones, J. and Darnton, A. (2013) Flood Advocacy & Support Service for Communities in Wales, Final Research Report and Recommendations Executive Summary, for WG.

6.1.3.5 Fielding, J. L. (2018) ‘Flood risk and inequalities between ethnic groups in the floodplains of England and Wales’, *Disasters*, 42(1), pp. 101–123.

Fielding, J (2017) ‘The devil is in the detail: who is actually at risk from flooding in England and Wales?’, *Journal of Flood Risk Management*, 10(2), pp. 267–276.

6.1.3.6 Fielding, J. L (2012) ‘Inequalities in exposure and awareness of flood risk in England and Wales’, *Disasters*, 36(3), pp. 477–494.

6.1.3.8 Harris, M. (2018). UK Civil Society: Changes and Challenges in the Age of New Public Governance and the Marketized Welfare State. *Nonprofit Policy*

Forum, 8, 351-368.

6.1.3.9 NRW (2020) *Flood and Coastal Erosion Risk Management in Wales, 2016-2019 Report by Natural Resources Wales to the Minister for Environment, Energy and Rural Affairs under Section 18 of the Flood and Water Management Act 2010 – Advice of FCEC, Sep 2019*

6.1.3.10 Naylor, Larissa, Glasgow University (personal communication, 2021) *Response to call for input from the Wales Flood and Coastal Erosion Committee, 2020*

6.1.3.11 Potter, K. and Jacklin-Jarvis, C. (2018), 'Brokering relationships with the state: what new understandings can 'environmental catchment VOs' filter from the social welfare domain?', in the Voluntary Sector and Volunteering Research Conference 2018 Proceedings.

6.1.3.12 Scottish Government (2019) Breakdown of money pledged by the Scottish Government to improve flood protection: EIR release, 26 July. Available at: <https://www.gov.scot/publications/foi-19-01713/> (Accessed 13/1/22).

6.1.3.13 Walker, G. and Burningham, K. (2011) 'Flood risk, vulnerability and environmental justice: Evidence and evaluation of inequality in a UK context', *Critical social policy*, 31(2), pp. 216–240.

6.1.3.14 WLGA (2015) *Wales Coastal Flooding Review - Project 7 Part A Report Recommendation 37 Skills & Capacity Audit, Dec 2015*;
<https://cdn.naturalresources.wales/media/679728/project-7-report-part-a-recommendation-37.pdf?mode=pad>

6.1.3.15 WLGA (2018) *Options for the Management of Flood & Coastal Erosion on a Regional Basis Regional Options, Jul 2018*.
www.wlga.wales/SharedFiles/Download.aspx?pageid=62&fileid=2042&mid=665

6.2 Mechanisms and processes for engaging with communities

Issue 35 Mechanisms for promoting behavioural change and uptake of resistance and resilience measures remain undeveloped, including the interface with spatial planning, the relationship between Place Plans and Community Flood Plans, the role of building regulations, and the role of the insurance sector to 'build back better'.

Proposal 17 – Review existing and commission novel research where necessary to:

- Further understanding of the potential role of building and planning regulations and mechanisms in the uptake of property-level resistance and resilience measures; and
- Consider incentives for the uptake of measures for those already in properties at risk.

Proposal 18 – Progress dialogue with the insurance sector to develop its role in the uptake of property level resistance and resilience/build back better.

Lead Agency – WG
Supporting Partners – NRW, LAs, WLGA .

Proposal 19 – Commission research to further understanding on how Community Flood Plans can be incorporated into planning processes, including the development of effective links and relationships with Place Plans (and potential contribution to the Place Plan 'Toolbox').

Proposal 20 – Provide training and ongoing support to town and community councils and community groups to improve their levels of understanding of information, of risks, and of the roles that they need to play.

Lead Agency – WG Planning Division
Supporting Partners – WLGA, NRW.

6.3.1 The Case for Proposals 17-20

The National Strategy recognises the importance of aligning with planning policy to inform better development and infrastructure decisions. Future Wales and Planning Policy Wales complement the National Strategy in not locating people into high risk areas. However, the role of Place Plans, including the relationship between Place Plans and Community Flood Plans has not yet been fully explored. Place Plans are prepared with the objective of becoming Supplementary Planning Guidance (i.e. not part of the LPA's Development Plan), However, they provide the opportunity for planning at the finer grain and at the local scale. Their remit includes addressing local, community scale 'issues'. Of note, Place Plans are also positioned to act as an enabler for interaction between local communities and local authorities when identifying and prioritising infrastructure needs. They are also expected to influence the distribution of funding raised from a Community Infrastructure Levy (Planning Aid Wales, n.d.). The capacity of Town and Community Councils and local communities is important to FCERM and, with resources, they could play a greater, interactive bottom-up role. This requires their engagement in resilience efforts *and* through the planning system. Early engagement in development plan and development management processes is vital, linking into Community Flood Plans. Further research has been recommended into mechanisms for promoting behavioural change and securing uptake of property-level resistance and resilience measures (including Build Back Better Flood Re <https://www.floodre.co.uk/buildbackbetter/>), looking across mechanisms including spatial planning, building regulations and insurance (Alexander et al., 2019).

6.3.2 The National Strategy

Proposals 17 to 20 will contribute to the delivery of paras 87, 94-95, 204, 206-207, 244, 309 and will build upon paras 58 and 246.

6.3.3 Evidence in Support of Proposals 17-20

6.3.3.1 Alexander, M., McKinley, E. and Ballinger, R. (2019) *Aligning Flood & Coastal Erosion Risk Management and Well-being in Wales: An analysis and evaluation of FCERM governance* www.pml.ac.uk/getattachment/CoastWeb/Outputs/Evaluation_FCERM_governance_Wales_Final_Report_Nov2019.pdf

6.3.3.2 [Planning Aid Wales \(n.d.\) Place Plans Guidance for communities \(placeplans.org.uk\)](http://placeplans.org.uk)

6.3.3.3 RTPI; *Response to call for input from the Wales Flood and Coastal Erosion Committee – November 2020*

Annex 2 - FCEC Resources Sub-Committee – Final Report – Guide to Acronyms

CIL	Community Infrastructure Levy
Defra	Department for the Environment, Food and Rural Affairs
EA	Environment Agency
FCEC	Flood and Coastal Erosion Committee
FCERM	Flood and Coastal Erosion Risk Management
ICT	Information and Communications Technology
LA	Local Authority
LDP	Local Development Plan
LLFA	Lead Local Flood Authority
LPA	Local Planning Authority
LTIR	Long Term Investment Requirements
NFM	Natural Flood Management
NRW	Natural Resources Wales
RMA	Risk Management Authority
RTPI	Royal Town Planning Institute
SDP	Strategic Development Plan
TAN	Technical Advice Note (Planning)
VO	Voluntary Organisation
WAO	Wales Audit Office
WaSC	Water and Sewerage Company
WCGF	Wales Coastal Groups Forum
WG	Welsh Government
WLGA	Welsh Local Government Association

MB 01.11.22