

04/06/2026

Dear

ATISN 26954 - Flooding

Information requested

Thank you for your request which I received on 11 May 2026. You asked for:

1. How much has Welsh Government spent on flood management measures since 2020, including through Welsh Government sponsored bodies such as Natural Resources Wales (NRW)?
2. How much of this was on coastal, fluvial and surface water flood management?
3. How much of each of those was spent on nature-based solutions (NbS) for flood management?
4. Where are each of these NbS, as identified in question 3, located?
5. Can you provide a brief description of each of those NbS?
6. How much did each of these NbS cost?
7. Who delivered each one of these NbS? E.g. Local Authority, NRW, Rivers Trust etc

Our response

I have decided the information is exempt from disclosure under section 12(4)(b) of the Environmental Information Regulations and is therefore withheld. The reasons for applying this exception are set out below.

Application of exemptions/exceptions

The Freedom of information Act/Environmental Information Regulations provide a right for anyone to ask a public authority to make requested information available to the wider public. As the release of requested information is to the world, not just the requester, public authorities need to consider the effects of making the information freely available to everybody. Any personal interest the requester has for accessing the information cannot override those wider considerations.

I have decided to withhold the information. This sets out the reasons for the engagement of section 12(4)(b) of the Environmental Information Regulations and our subsequent consideration of the Public Interest Test.

Engagement of section 12(4)(b) (manifestly unreasonable request) of the Environmental Information Regulations

In the first instance, I am of the view that the information you want me to search for is environmental information and as such I have considered your request under the Environmental Information Regulations 2004 (EIRs). 'Environmental information' is defined in the Regulations as (inter alia) 'information on measures (including

administrative measures), such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affect the state of the elements of the environment, such as air and atmosphere, water, soil, land, landscape and natural sites, and also factors such as substances, energy, noise, radiation or waste likely to affect the state of the elements of the environment above’.

I have concluded that your request is both voluminous and complex and will be very time consuming to deal. Under the EIRs, there is no appropriate costs limit above which public authorities are not required to deal with requests for information. However, Reg 12(4)(b), manifestly unreasonable request, can apply if the cost or burden of dealing with a request is too great. This position was confirmed in the Upper Tribunal case of *Craven v The Information Commissioner and the Department of Energy and Climate Change* [2012] UKUT442 (AAC).

“Taking the position under the EIR first, it must be right that a public authority is entitled to refuse a single extremely burdensome request under regulation 12(4)(b) as “manifestly unreasonable”, purely on the basis that the cost of compliance would be too great (assuming, of course, it is also satisfied that the public interest test favours maintaining the exception). The absence of any provision in the EIR equivalent to section 12 of FOIA makes such a conclusion inescapable.”

Providing the information requested would require a review of financial transactions, grant applications and associated reports from local authorities, as well as NRW schemes funded through our Natural Flood Management (NFM) programme. Welsh Government does not maintain a list of this information in the form you have requested.

We ran the scenario on how long it would take and our findings are below:

Estimated Time to Review Applications

Main Capital Schemes

- **Processing time per scheme:**
7–9 minutes (review) + 3–4 minutes (sense check)
= **10–13 minutes per scheme**
- **Volume:**
Approx. 433 schemes
- **Total estimated time:**
4,330 – 5,629 minutes
= **72 – 94 hours**

Small Scale Works Grant (SSWG)

- **Processing time per scheme:**
18–20 minutes (review) + 5 minutes (sense check)
= **23–25 minutes per scheme**
- **Volume:**
Approx. 600 schemes

- **Total estimated time:**
13,800 – 15,000 minutes
= **230 – 250 hours**

Natural Flood Management (NFM / NbS)

- **Processing time per scheme:**
10–12 minutes (review) + 5 minutes (sense check)
= **15–17 minutes per scheme**
- **Volume:**
Approx. 200 schemes
- **Total estimated time:**
3,000 – 3,400 minutes
= **50 – 57 hours**

Overall Estimated time

- **Total volume:**
Approx. 1,233 schemes
- **Total estimated time:**
21,130 – 24,029 minutes
- **Equivalent in hours:**
352 – 400 hours (circa)

Based on sampled processing times and scheme volumes, the total estimated effort to review all applications is approximately **352-400 hours** (equivalent to circa **9.5-11 working weeks**).

This estimate reflects the need to manually reconcile information across multiple systems and includes a proportionate allowance for quality assurance through an independent review process, given the complexity and variability of the underlying data.

Natural Resources Wales (NRW) receive grant in aid funding from Welsh Government to carry out flood risk management works in Wales. To establish the completed scheme spend, source of flooding and other associated outputs associated with NRW schemes, you will need to contact NRW directly.

Public Interest Test

Reg 12(4)(b) is subject to the public interest test. I have given consideration to the public interest in disclosing the information. The Welsh Government recognises the general public interest in openness and transparency and that releasing the information would help the public gain a better understanding of the overall schemes funded through the Flood and Coastal Erosion Team.

Nevertheless, the burden to the public purse in transforming recorded information and compiling it into the format you have requested is large, as explained above, and the public interest is not served by the expenditure of public resource on this public

task at the cost of other public tasks. Publishing data in this format does not serve any identified public benefit other than the principle of openness and transparency as some of this information is already mapped on datamap Wales, links to which are provided below.

Considering the broadness of your request, and the date range for data, the Welsh Government considers the balance of the public interest lies in favour of refusing your request. This is because it is believed your request would place a substantial and unreasonable burden on Welsh Government resources which are already stretched and on balance, it is considered the public interest would be better served by deploying our resources in undertaking core work.

As part of these considerations, we have applied the statutory presumption in favour of disclosure under Reg12(2) of the Regulations, but our view is that the significant burden that this request would impose outweighs the public interest in releasing this information.

Your request is therefore refused under Reg 12(4)(b) – manifestly unreasonable, of the EIRs, for the reasons outlined above.

You may wish to refine your request by narrowing its scope by being more specific about what information you particularly wish to obtain, including any dates or period of time relevant to the information required. However, we can provide alternative information that may be helpful. This includes published annual programmes listing all schemes allocated capital funding by the Flood and Coastal Erosion Risk Management Programme (e.g. coastal, Natural Flood Management, Main Capital, NRW and Small Scale Works Grant), which may indicate the type of flooding being addressed.

<https://www.gov.wales/flood-and-coastal-erosion-risk-management-programme>

Below are publicly available maps showing where funding has been allocated at the beginning of each financial year along with wider attributes. However, the published costs show the potential funding available to a given scheme in any year, but not the final spend. Costs and timescales can fluctuate from scheme to scheme and Risk Management Authorities are ultimately responsible for their delivery. Whilst this information does not explicitly identify flood source, scheme locations in relation to rivers or the coastline can provide useful context.

[View map | DataMapWales](#)

If you do refine your request in this way, this will be treated as a new request.

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit,
Welsh Government,
Cathays Park,
Cardiff,
CF10 3NQ

or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF.

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely,