

# **Natural Resources Wales Flood Risk Management Plan – consultation summary response document**

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# Introduction

The [Flood Risk Regulations \(2009\)](#) set out a framework for the effective management of flood risk in England and Wales. Natural Resources Wales has a duty to identify areas at risk of flooding via a [Preliminary Flood Risk Assessment \(PFRA\)](#) and then to produce [Flood Hazard and Flood Risk Maps](#). We then have a duty to produce a FRMP outlining our intended objectives and measures for managing flood risk identified within these earlier phases.

Our previous (first cycle) FRMPs were produced in 2016 at River Basin District (RBD) scale and covered the Western Wales, the Severn and the Dee. The Severn and the Dee FRMPs were produced jointly with the Environment Agency. This time around we have taken a different approach by taking a Wales-wide view for our FRMP.

Our FRMP provides an overview of where is at risk of flooding in Wales and directs you to where you can find out further information from our interactive maps. It sets out our national Wales-wide Objective, Priorities and Measures for managing the risk of flooding and provides further information on the level of risk, including what we have planned for the communities with the greatest flood risks.

We consulted on our draft Flood Risk Management Plan for Wales from 1 March to 24 May 2023. The draft plan set out proposals for managing the risk of flooding from main rivers, reservoirs and the sea across Wales for the next six years and beyond. The plan was accompanied by a draft environmental report, documenting the Strategic Environmental Assessment (SEA) and a draft Habitats Regulations Assessment.

## Consultation questions

We asked the following questions during the consultation to get views on our Flood Risk Management Plan:

Questions about the respondent

- 1: What is your name?
- 2: What is your email address?
- 3: Are you responding as an individual, a business or an organisation?

Objectives and priorities

4: Our overarching objective within the draft Flood Risk Management Plan is to "Reduce the risk to life from flooding to people and communities from main rivers, reservoirs and the sea" Do you agree with this objective?

5: We have set out 14 priorities for managing flood risk in Wales. Do you agree with these priorities?

National and local measures

6: In regard to the National Measures identified within the plan, do you agree with these measures?

7: In regard to the Local Measures identified within each of the place based local sections, do you agree with these measures?

8: Is there a particular area of the plan to which your feedback refers?

9: To what extent do you think the priorities and measures set out in the draft Flood Risk Management Plan support and contribute to the delivery of the ambitions in Welsh Government's Flood and Coastal Erosion Risk Management Strategy (FCERM Strategy)?

#### Wider links

10: To what extent do the measures in the draft Flood Risk Management Plan help to deliver multiple benefits for both flood risk management and the wider environment?

11: To what extent do you agree that the draft Flood Risk Management Plan considers the likely impacts of flood risk associated with climate change?

#### Consideration of the environment

12: Do you agree with the conclusions of the Environmental Report?

13: Do you agree with the conclusions of the draft Habitats Regulations Assessment?

14: Are there any further significant environmental effects, either positive or negative, of the draft Flood Risk Management Plan which you think should be considered?

15: Are there further opportunities to enhance any positive or mitigate any negative environmental effects that should be considered for the final Flood Risk Management Plan?

#### Welsh language considerations

16: Could the plan affect opportunities for people to use the Welsh language?

17: Is there a way we can increase the use of Welsh or provide more opportunities for people to use the Welsh language?

18: Are there any aspects of the plan that could disadvantage people in using the Welsh language?

19: Do you believe the plan treats the Welsh language less favourably than the English language?

#### Final questions

20: The draft Flood Risk Management Plan also provides a range of information setting the strategic context for this plan and also provides information on the scale of flood risk across Wales. Did you find this information useful?

21: Overall, how would you describe your experience of finding and navigating the information within the draft Flood Risk Management Plan?

22: Is there any other feedback you would like to provide on the draft Flood Risk Management Plan?

Responses received during the consultation will be used to amend and finalise the Flood Risk Management Plan for publication.

This document is intended to provide a summary of the responses received through the consultation on the draft plan and indicate how we will take those responses into consideration for the final plan.

## Summary of responses

We received 40 responses to the consultation on our draft Flood Risk Management Plan. 21 responses were received from organisations, 17 were received from individuals and 2 responses identified as 'other'.

Responses were received from the following organisations:

Association of British Insurers

British Red Cross

Caerphilly County Borough Council

Ceredigion County Borough Council

Chartered Institute of Ecology and Environmental Management (Wales)

Conwy County Borough Council

Farmers' Union of Wales

Flood and Coastal Erosion Committee (Wales)

Isle of Anglesey County Council

Llangattock Community Council

Monmouthshire County Borough Council

National Farmers Union (Wales)

National fire chiefs council

Natural Resources Wales (statutory consultee function)

Neath Port Talbot County Borough Council

Public Health Wales

Torfaen County Borough Council

Transport for Wales

Vale of Glamorgan County Borough Council

Wrexham County Borough Council

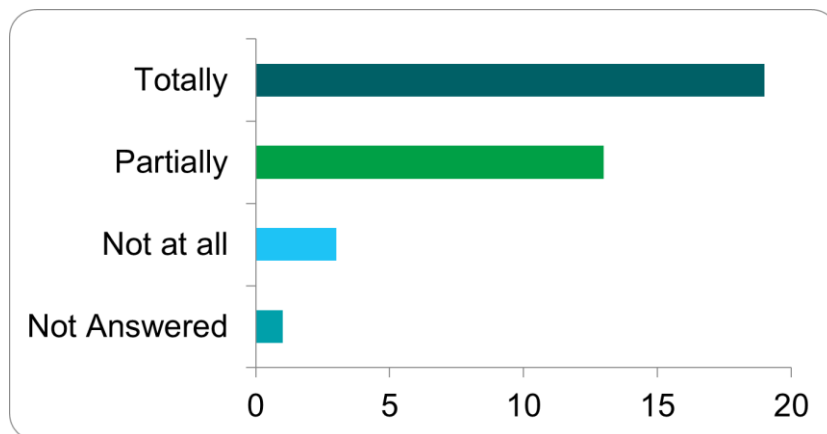
The following section provides a breakdown of the responses to each question. Overall, our respondents were happy with the measures and information included in the FRMP. Alongside each question, respondents were given an opportunity to provide comments and feedback. We have reviewed and analysed this feedback and identified a number of key themes that were considered in further detail with changes made where necessary for the final FRMP. The key themes that were identified through the consultation are covered in the next section of this report.

## Objectives and priorities

**Consultation question 4:** Our overarching objective within the draft Flood Risk Management Plan is to "Reduce the risk to life from flooding to people and communities from main rivers, reservoirs and the sea". Do you agree with this objective?

There were 35 responses to this part of the question. 32 respondents were in total or partial agreement with the objective.

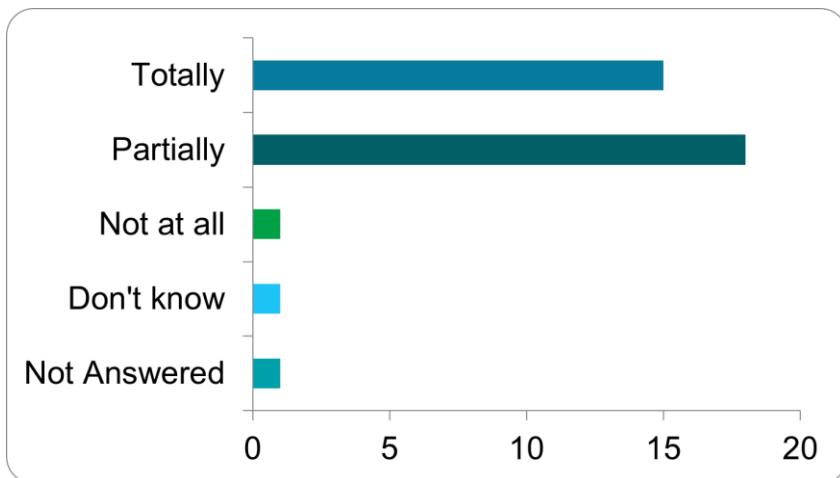
Figure 1: Bar chart showing the split of responses for consultation question 4 on the objective.



**Consultation question 5:** We have set out 14 priorities for managing flood risk in Wales. Do you agree with these priorities?

There were 35 responses to this part of the question. 33 respondents were in total or partial agreement with the priorities.

Figure 2: Bar chart showing the split of responses for consultation question 5 on the priorities.

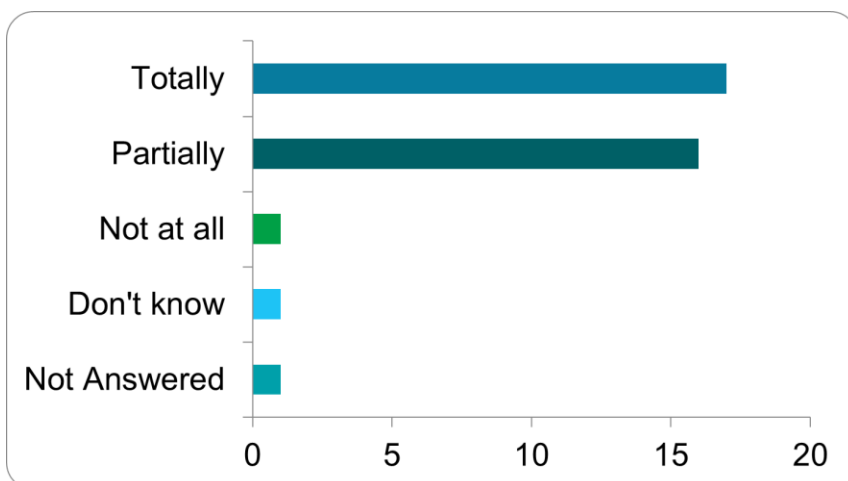


## National and local measures

**Consultation question 6:** In regard to the National Measures identified within the plan, do you agree with these measures?

There were 35 responses to this part of the question. 33 respondents were in total or partial agreement with the National measures.

Figure 3: Bar chart showing the split of responses for consultation question 6 on the National measures

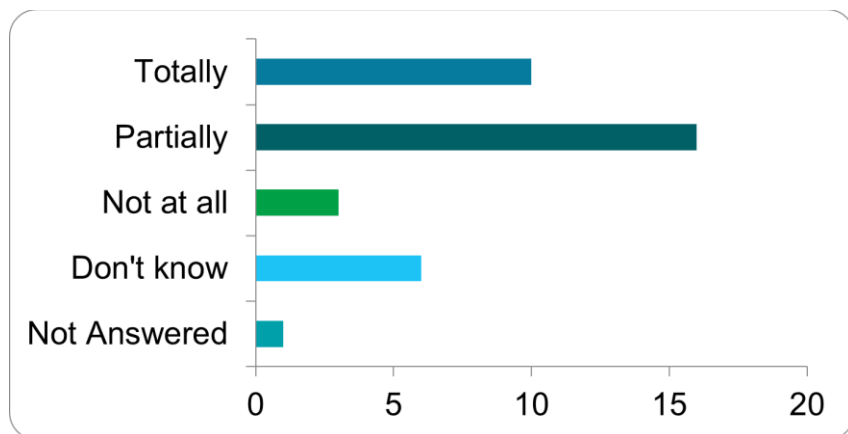




**Consultation question 7:** In regard to the Local Measures identified within each of the place based local sections, do you agree with these measures?

There were 35 responses to this part of the question. 26 respondents were in total or partial agreement with the local measures.

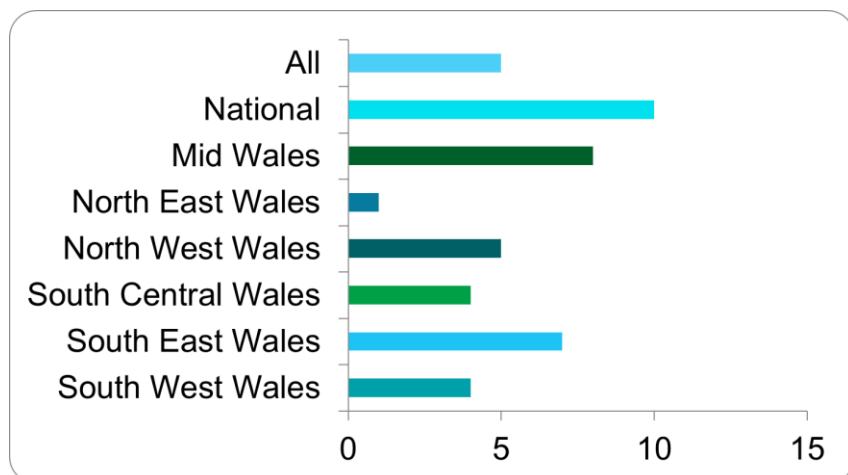
Figure 4: Bar chart showing the split of responses for consultation question 7 on the local measures



**Consultation question 8:** Is there a particular area of the plan to which your feedback refers?

There were 36 responses to this part of the question.

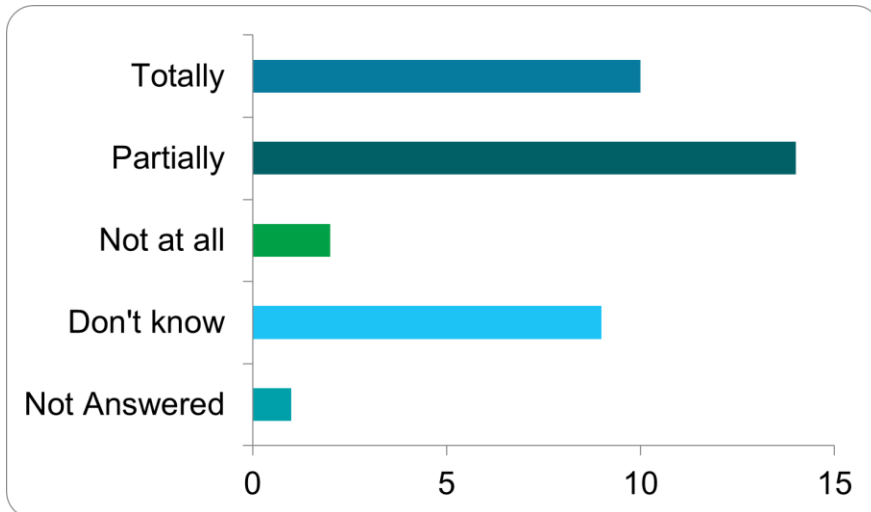
Figure 5: Bar chart showing the split of responses for consultation question 8 showing which area of the plan the respondent was interested in.



**Consultation question 9:** To what extent do you think the priorities and measures set out in the draft Flood Risk Management Plan support and contribute to the delivery of the ambitions in Welsh Government's Flood and Coastal Erosion Risk Management Strategy (FCERM Strategy)?

There were 35 responses to this part of the question. 24 respondents were in total or partial agreement that the priorities and measures set out in the draft Flood Risk Management Plan support and contribute to the Welsh FCERM Strategy.

Figure 6: Bar chart showing the split of responses for consultation question 9 on the Flood Risk Management Plan contributing to the delivery of the Welsh FCERM Strategy.

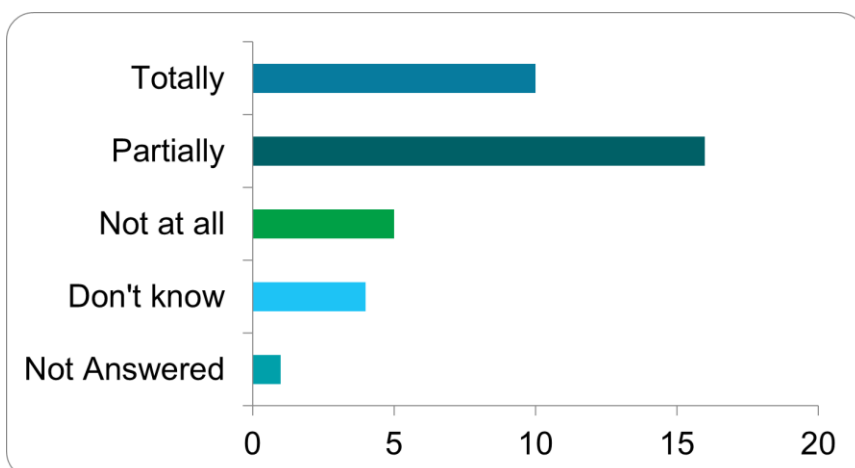


## Wider links

**Consultation question 10:** To what extent do the measures in the draft Flood Risk Management Plan help to deliver multiple benefits for both flood risk management and the wider environment?

There were 35 responses to this part of the question. 26 respondents were in total or partial agreement that the Flood Risk Management Plan would deliver multiple benefits for flood risk management and the wider environment.

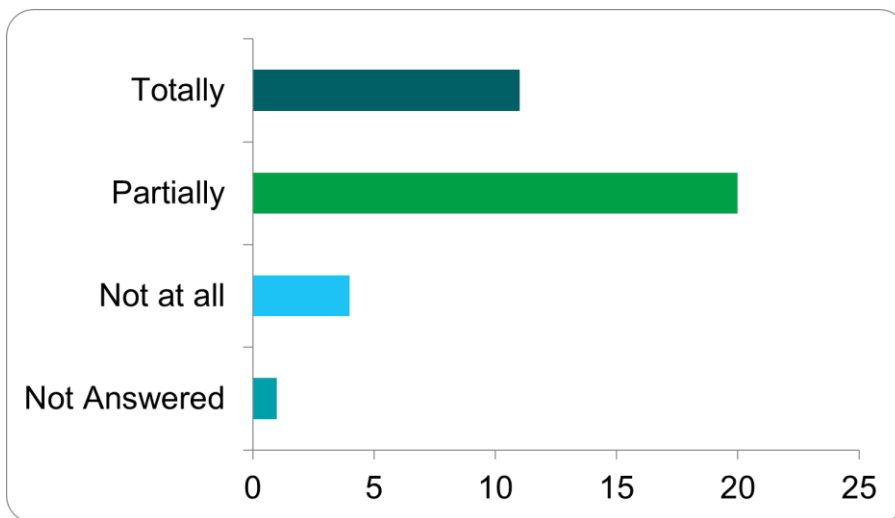
Figure 7: Bar chart showing the split of responses for consultation question 10 on the Flood Risk Management Plan delivering multiple benefits.



**Consultation question 11:** To what extent do you agree that the draft Flood Risk Management Plan considers the likely impacts of flood risk associated with climate change?

There were 35 responses to this part of the question. 31 respondents were in total or partial agreement that the Flood Risk Management Plan considers the likely impacts of climate change.

Figure 8: Bar chart showing the split of responses for consultation question 11 on the Flood Risk Management Plan considering climate change.

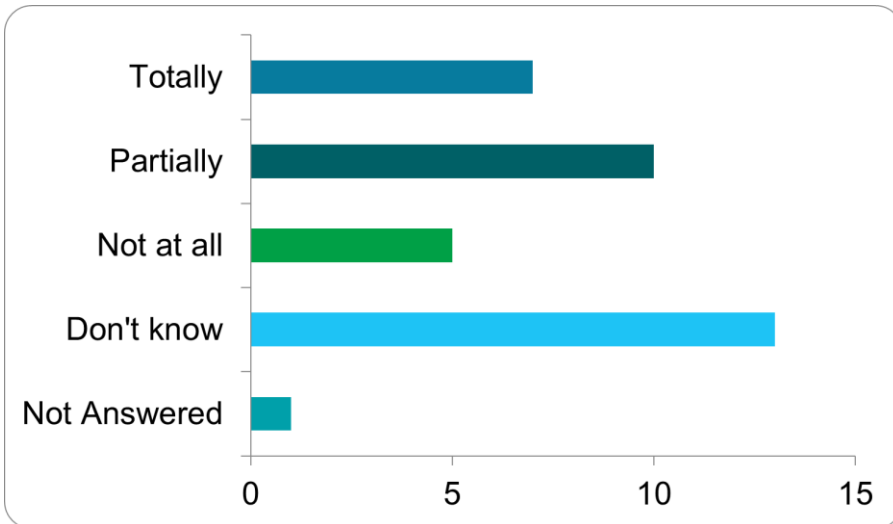


## Consideration of the environment

**Consultation question 12:** Do you agree with the conclusions of the Environmental Report?

There were 35 responses to this part of the question. 17 respondents were in total or partial agreement with the conclusions of the Environmental Report.

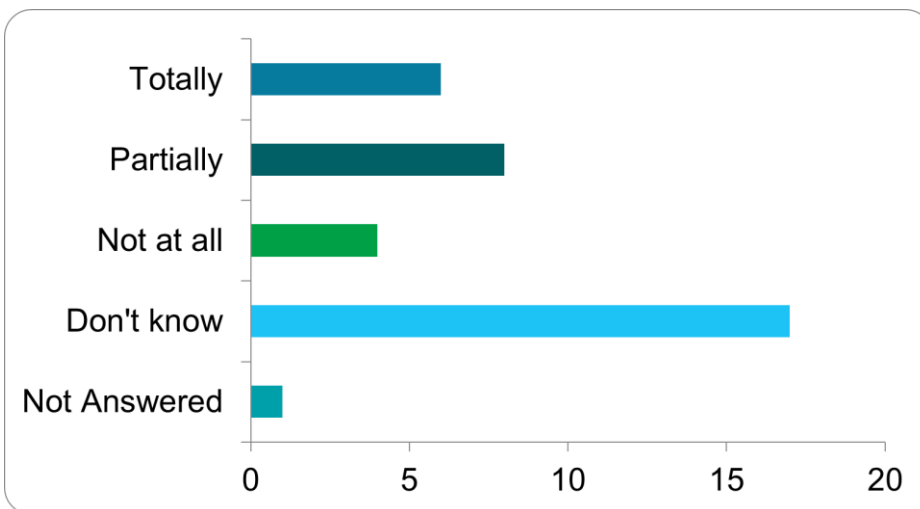
Figure 9: Bar chart showing the split of responses for consultation question 12 on the conclusions of the environmental report.



**Consultation question 13:** Do you agree with the conclusions of the draft Habitats Regulations Assessment

There were 35 responses to this part of the question. 14 respondents were in total or partial agreement with the conclusions of the draft Habitats Regulations Assessment. 17 respondents did not know.

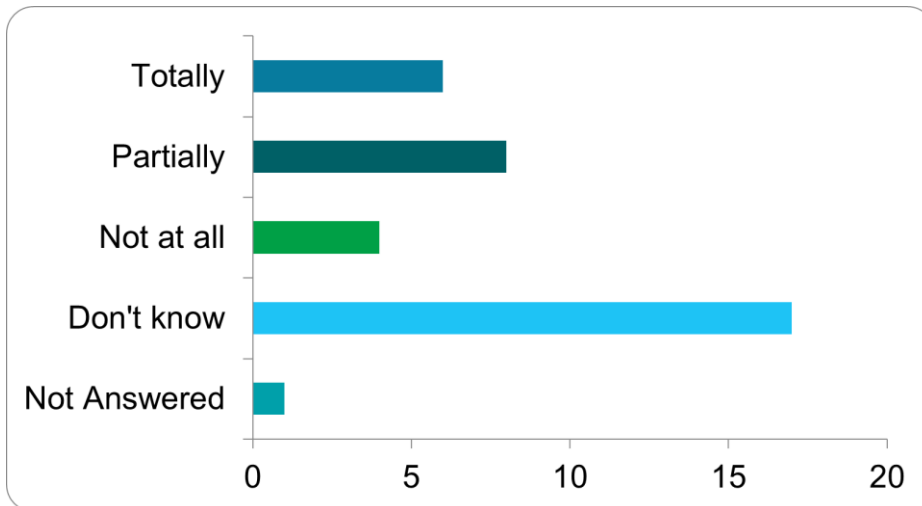
Figure 10: Bar chart showing the split of responses for consultation question 13 on the conclusions of the draft habitats regulations assessment.



**Consultation question 14:** Are there any further significant environmental effects, either positive or negative, of the draft Flood Risk Management Plan which you think should be considered?

There were 35 responses to this part of the question. 12 respondents felt there were further significant environmental effects that should be considered.

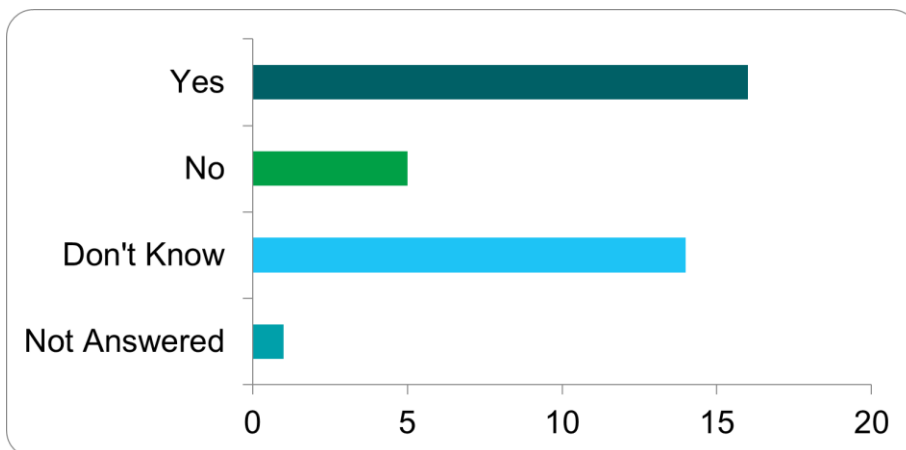
Figure 11: Bar chart showing the split of responses for consultation question 14 on further significant environmental effects that should be considered.



**Consultation question 15:** Are there further opportunities to enhance any positive or mitigate any negative environmental effects that should be considered for the final Flood Risk Management Plan?

There were 35 responses to this part of the question. 16 respondents felt there were further opportunities to enhance positive or mitigate negative environmental effects.

Figure 12: Bar chart showing the split of responses for consultation question 15 on further opportunities to enhance positive or mitigate negative environmental effects.



## Welsh language considerations

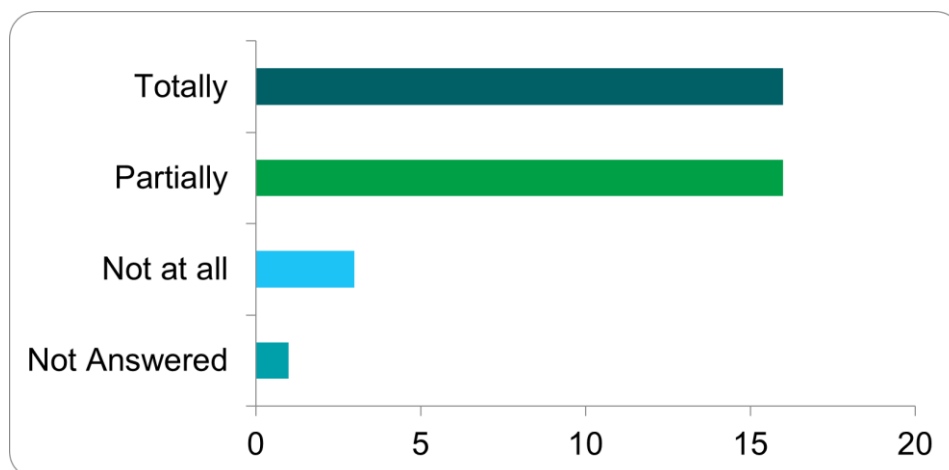
Questions 16 to 19 in the consultation covered Welsh language considerations. These were feedback only questions so no statistic graphs are able to be produced for these. Those that did respond to the Welsh language questions felt that the Flood Risk Management Plan contributes positively to the Welsh language.

## Final questions

**Consultation question 20:** The draft Flood Risk Management Plan also provides a range of information setting the strategic context for this plan and also provides information on the scale of flood risk across Wales. Did you find this information useful?

There were 35 responses to this part of the question. 32 respondents were in total or partial agreement with the information being useful from the Flood Risk Management Plan.

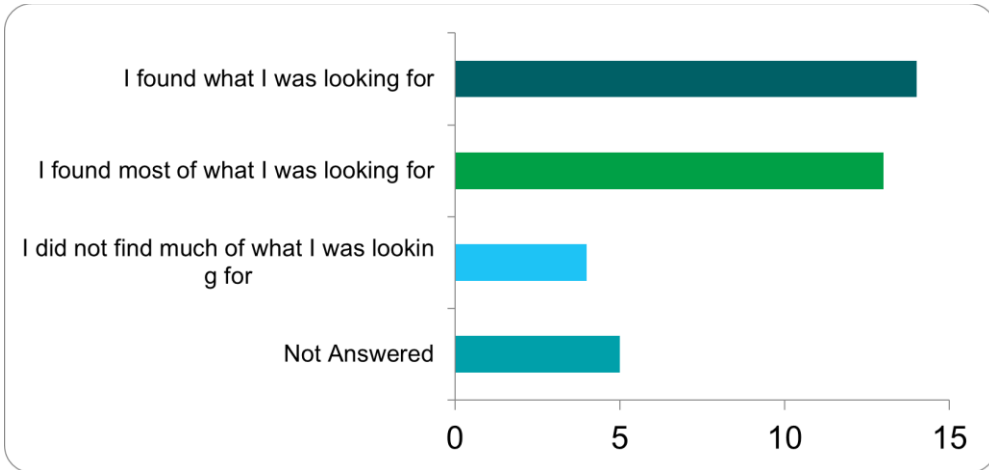
Figure 13: Bar chart showing the split of responses for consultation question 20 on the usefulness of the Flood Risk Management Plan information.



**Consultation question 21:** Overall, how would you describe your experience of finding and navigating the information within the draft Flood Risk Management Plan?

There were 31 responses to this part of the question. 27 respondents were in total or partial agreement that they found what they were looking for in the Flood Risk Management Plan.

Figure 14: Bar chart showing the split of responses for consultation question 21 on the whether respondents found what they were looking for in the Flood Risk Management Plan.



## Key themes

**Theme:** Priorities

**Consultation comments:** The comments we received against the FRMP Priorities were mostly supportive of the priorities. We received suggestions to improve the priorities which we considered further, particularly around working with nature and being more direct with what is intended.

**Action for the FRMP:** We considered the comments received in relation to the Flood Risk Management Plan priorities and have made changes to the priorities as a result so that the intention of each is clearer for the reader. We have also improved the text introducing the priorities to explain to the reader how the priorities complement and enable the effective delivery of our overarching objective. In addition, we have included an explanation that the priorities are numbered to help illustrate the alignment of the measures set out within this FRMP, rather than being ranked in any way.

**Theme:** Communities at risk

**Consultation comments:** We received specific comments related to certain communities and their inclusion or exclusion in the plan. We also received comments about the FRMP using undefended communities for prioritisation with suggestions that we should also reference where these communities already have defences.

**Action for the FRMP:** We have developed a tool to help identify the locations of greatest risk of flooding in Wales. This is called the Communities at Risk Register (CaRR), which uses the evidence provided by the Flood Risk Assessment Wales (FRAW) maps. The CaRR uses outputs from the FRAW flood models to consider the number of people at risk, the hazard they are exposed to over a range of probabilities, the speed of onset of flooding and their ability to respond in terms of social vulnerability to flooding. It also uses factors such as availability and standard of flood warnings and flood defences. The CaRR is used to prioritise communities in the Place sections of this FRMP for both present flood risk and predictions for future flood risk. Through the consultation, we received comments querying why some communities had been included and others were missing. The CaRR prioritises those communities that are at risk of flooding and have therefore been included within the FRMP because they are communities where actions are planned in the coming years to help manage and reduce the risk of flooding. This does not mean that these are the only communities that are at risk of flooding. Our National measures in the National section of the FRMP include both one off projects to address a specific need or deliver a particular flood risk management improvement, as well as routine activities that NRW plans to undertake to manage the risk of flooding for communities across Wales and these will cover more than just the communities mentioned in the FRMP.

The FRMP prioritises communities as if there were no flood defences because even though somewhere might be protected by flood defences, there is still a risk to those communities that benefit from the defences should the defence fail or be overtopped.



**Theme:** Flood Risk Management Plan Objective

**Consultation comments:** Many comments that were received in relation to the FRMP objective were around the scope of the objective being quite narrow with suggestions to make it broader.

**Action for the FRMP:** We considered the comments received and have amended the objective to mirror the scope of the objective in the Welsh Government Flood and Coastal Erosion Risk Management Strategy. Our overarching objective is now 'reduce the risk to people and communities from flooding from main rivers, reservoirs and the sea'. Our priorities are intended to directly complement and enable the effective delivery of our overarching objective so should be considered together.

**Theme:** Flood Risk Management Plan local measures

**Consultation comments:** We received specific comments about measures for certain communities and also comments relating to the need for measures over the longer term, particularly in relation to the threat of climate change.

**Action for the FRMP:** We considered the comments received related to the measures and have made some changes where appropriate. We have also added a section to each part of the plan which describes what we are doing to prepare for future flood risk.

**Theme:** How the FRMP considers agricultural land

**Consultation comments:** We received comments in relation to agricultural land and how it is prioritised from a flood risk perspective.

**Action for the FRMP:** We have reviewed the information we provide within the FRMP around how we plan and prioritise communities to ensure this is as clear as it can be. We have also shared the comments received in relation to flood risk and agricultural land with the Welsh Government.

Welsh Government's FCERM Strategy places a priority on reducing risks to homes, we therefore follow this direction in the prioritisation of our work. We do, however, recognise the impacts flooding has on businesses and more broadly agricultural land. We also recognise the opportunity that working with land managers in Wales offers in helping to manage flood risk to communities, we have added further information to the FRMP regarding our approach to Nature Based Solutions (see below) which includes initiatives to work with and support land managers.

**Theme:** Nature Based Solutions

**Consultation comments:** We received comments from respondents who felt the FRMP did not include enough on Nature Based Solutions.

**Action for the FRMP:** We have added the following section on Nature Based Solutions to explain how NRW implements this throughout our work.

The Welsh Government Natural Resources Policy highlights nature-based solutions as a priority for the sustainable management of natural resources. Natural Flood Management (NFM) is a nature-based solution to help reduce flood risk and complements other flood risk management approaches. When delivered correctly can also provide many co-benefits, such as habitat creation, carbon storage, water quality improvement, and help increase drought resilience.

The Welsh Government National Strategy for Flood and Coastal Erosion Risk Management in Wales promotes NFM, highlighting the multiple benefits it delivers as well as setting direction to see more delivered in Wales. The Strategy defines NFM as measures which include both working with natural processes and green infrastructure as shown in the continuum below (Figure 15)

Figure 15 Option appraisal continuum from the Welsh Government National Strategy for Flood and Coastal Erosion Risk Management, October 2020



Working with natural processes involves working across the landscape to protect, restore or mimic the natural hydrological processes. This includes increasing infiltration of water, slowing the flow of water across the landscape, storing water, and holding back sediment. Green and Green Grey measures tend to focus on areas in and around the receptors at risk and are usually used in combination with other (engineered) measures to help improve water quality, morphology, and ecosystem resilience alongside reducing the risk of flooding to people and communities.

As an organisation we want to lead by example, delivering our corporate objectives to protect and enhance nature, respond to the climate emergency, and minimise pollution. The implementation of NFM measures has the potential to deliver against these objectives and we use the above continuum to support our decision making when working to reduce the risk and increase resilience to flooding. NRW is responsible for managing the risk and impacts of flooding from main rivers with resources and funding directed to communities

most at risk. NFM can play an important role, complementing all the other actions outlined in this plan, but NFM may not be suitable for all main river catchments as it is generally shown to be more effective in areas located close to smaller watercourses, or to address surface water flooding.

NRW recognise catchment scale NFM is an important part of an integrated flood risk management approach, and considering the environmental co-benefits, it is key for improving overall catchment resilience. Delivery of catchment NFM requires effective collaboration across organisations and between partners, stakeholders, and landowners who all have a role in promoting, supporting, and delivering activities to reduce the risk and impacts of flooding. NRW are working in the following ways to progress the implementation of NFM in Wales.

- taking opportunities to embed nature based solutions within our FRM activities, where it's appropriate and effective to do so
- seeking opportunities through our work on the Welsh Government Woodland Estate
- working with partners to deliver catchment approaches
- influencing wider policies and strategies to support our role in managing flooding from main rivers
- supporting activities that deliver the sustainable management of natural resources.

# Summary of responses to the Flood Risk Management Plan Environmental Reports

## SEA Environmental Report

Those that responded to the Environmental Reports were broadly supportive, although many replied “don’t know”. Whilst SEA requirements are set in legislation, we will need to consider how we can make Environmental Reports more accessible and clearly understandable in future consultations.

Respondents recognised the importance of land management in relation to flood risk management. This will include influencing development and implementation of the Sustainable Farming Scheme, to reduce run off. Opportunities to manage land and water in a collaborative way should be sought.

Respondents wished to see greater consideration of the impacts of flooding on agriculture and wildlife. We will consider this further in the SEA and as projects are developed from the FRMP. They also considered there should be greater emphasis on enhancing biodiversity through FRM measures, given that Welsh Government have declared a Nature Emergency. Enhancing biodiversity through our operations is a legal duty and we seek to deliver such opportunities through our projects. The FRMP priorities have been amended to make this more explicit.

Public Health Wales (PHW) supported the inclusion of Health Impact Assessment (HIA) within the Strategic Environmental Assessment and recommended that HIA is also a part of project development. NRW is developing approaches to HIA in projects ahead of the awaited legislation.

PHW also considered that monitoring indicators for population health could be significantly expanded to monitor the health and wellbeing impacts of flooding. NRW would welcome collaboration with PHW to prevent a duplication of effort and to recognise the importance of health effects of flooding beyond risk to life.

Concern was expressed at the implementation of Shoreline Management Policy at a local scale and in particular through asset management, the respondent considered that the assessment underplayed the impact on climatic factors. One of the key opportunities raised was to consider capturing within local measures the locations where coastal adaptation needs to be implemented as a result of SMP policy during the lifetime of this FRMP. The Coastal Adaptation Programme includes projects around the coast of Wales. Some of these are included in the local measures eg Tidal Dyfi, but some have not been included due to the sensitive nature of the information.

FRM will work closely with colleagues in Sustainable Land Management in the management of Welsh Government Woodland Estate. The FRMP identifies communities at risk to help determine whether felling programmes may exceed a catchment threshold and therefore need to be phased, or similar adjustments made, to reduce the risk of flooding, as per the 2022 UKFS Practice Guide on designing and managing forests and woodlands to reduce flood risk.

## Next Steps

The Environmental Report will be revised in light of the responses received to the consultation and to reflect the changes made between the draft and final FRMP2. The Statement of Particulars (SoP) will be published alongside the adopted FRMP2. The purpose of the SoP is to demonstrate:

1. How environmental considerations have been integrated into the 2<sup>nd</sup> cycle NRW Flood Risk Management Plan;
2. How the Environmental Report has been taken into account;
3. How opinions expressed in response to the consultation on the Environmental Report have been taken into account;
4. The reasons for choosing the 2<sup>nd</sup> cycle NRW Flood Risk Management Plan, as adopted, in the light of the other reasonable alternatives dealt with; and
5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the 2<sup>nd</sup> cycle Flood Risk Management Plan.

### Draft HRA

Again, respondents found the draft HRA to be technical and not easily understood. It is not a legal requirement to publish HRA's but where we do, we will publish a non-technical summary. We will develop this for future HRA's.

NRW responding as Appropriate Nature Conservation Body (ANCB) agreed with the conclusion that the Wales FRMP will not have an adverse effect on the integrity of European sites when considered alone or in-combination with other plans or projects.

The draft HRA screened out projects that are currently underway and going through project level HRA. However, NRW (ANCB) had some concerns regarding the reliance on ongoing HRAs, and sought clarity as to what the implications would be for this HRA and the FRMP itself if those ongoing HRAs were unable to rule out adverse effects on the integrity of any European sites. It is possible that project level HRA's, including those that are underway, will have to be taken through the derogations. To give further confidence in the approach we will screen in any projects that are underway to the final HRA.

NRW (ANCB) supported the reliance to the SMP2 HRA, however, the final HRA should explicitly state the conclusions of that HRA. In particular, referencing that any projects within managed realignment policy areas have not been assessed and should be deferred down to a project level, and any projects that are not in line with SMP policy. If for any reason a measure categorised as no active intervention in the original SMP2 HRA, and therefore assessed as having no impacts, has changed (or will change at some stage in the future) to Hold the line, then again it will need consideration at a project level. In these circumstances the Wales Coastal Group Forum guidance on the SMP2 Major Policy

Change Process in Wales<sup>1</sup> will apply. Major changes are: 'Changes to a policy, or epoch in which a policy is to be implemented, or changes to the action plan that are likely to result in this'. A major policy change may be considered if new evidence emerges that suggests a change could be justified. Or where maintenance activities are planned to be withdrawn, our operational guidance will be applied. This requires that HRA is considered in the decision to withdraw.

NRW (ANCB) supported the in combination assessment, including the 7 area statements and agreed that the criteria have been met to defer HRA to a project level, whilst also taking into account generic mitigation.

NRW (ANCB) question the lack of coastal adaptation projects in the local measures, apart from the North West Area FRMP. Given the reliance on compliance with SMP2 policy in the Welsh National Marine Plan and the Marine Area Statement, NRW (ANCB) question whether in combination effects can be ruled out. The Coastal Adaptation Programme includes projects around the coast of Wales. Some of these are included in the local measures eg Tidal Dyfi, but some have not been included due to the sensitive nature of the information. We are confident that this will rule out in combination effects.

## Next Steps

The draft HRA will be revised in light of comments received and to reflect the changes being made to the draft FRMP. The final HRA will be issued to NRW and Natural England as ANCB and NRW (FRM) must have regard to their advice in the adoption of the FRMP2.

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<sup>1</sup> Wales Coastal Group Forum. 2019. Shoreline Management Plans, Guidance to Major Policy Change Process in Wales.

## Next steps

Individuals who wish to follow up their responses, or points made within this document in more detail are welcome to contact us.

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Responses from this consultation have been used to inform the development and delivery of the final Flood Risk Management Plan which will be published on our website by the end of 2023.