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Wales

Summary of responses for the draft Flood Risk Management Plan consultation in Wales

Update - November 2015

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1. Introduction

The EU Floods Directive 2007/60/EC came into force in November 2007 and is transposed into UK law through the Flood Risk Regulations 2009. The legislation requires member states to assess if watercourses and coastlines are at risk from flooding, to map the extent and what is at risk in these areas and to take adequate and coordinated measures to reduce this flood risk. This represents a six year cycle of planning which culminates with the publication of Flood Risk Management Plans in December 2015.

Natural Resources Wales is the responsible authority for producing Flood Risk Management Plans for Wales covering flooding for main rivers, reservoirs and the sea.

Draft Flood Risk Management Plans

On the 10th October 2014, Natural Resources Wales published three draft Flood Risk Management Plans for consultation covering the Severn River Basin District; the Dee River Basin District and the Western Wales River Basin District. The Severn and the Dee Flood Risk Management Plans were produced jointly with the Environment Agency in England. Each of these plans were accompanied by an environmental report, documenting the Strategic Environmental Assessment (SEA).

The draft plans 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. They describe what and where is at risk of flooding, and from which source. Most importantly, the plans set out what measures Natural Resources Wales would like to take to address the risk of flooding for those communities that are at greatest risk from flooding.

The public consultation ran from 10th October 2014 until 31st January 2015 and included the following questions:

Consultation Question 1

Do you agree this draft plan sets out the most significant flood risk issues for your area? (yes / no). If not, please explain what you think is missing.

Consultation Question 2

What do you consider to be the highest priorities for managing the risk of flooding in your area?

It is important to have the right objectives for managing the risk of flooding, taking account of the impacts of flooding on people, property and the environment.

Consultation Question 3

Do you understand the objectives as described in the draft plan? (yes / no). If not, what would help you understand them better?

Consultation Question 4

Is the balance right between the 'social', 'economic' and 'environmental' objectives, as explained in the draft plan? (yes / no). If not, what would you change and why?

Consultation Question 5

Are there other flood risk management objectives that should be included? (yes / no). If so, please explain what they are and why they should be included?

This draft plan proposes new 'measures' to manage flood risk, alongside measures which are already 'agreed' and 'ongoing'.

Consultation Question 6

Do you understand the difference between ongoing, agreed and proposed measures, as explained in the draft plan? (yes / no). If not, what would help you understand them better?

Across all proposed, agreed and ongoing measures, the plan describes 'prevention', 'preparation', 'protection' and 'recovery and review' approaches.

Consultation Question 7

Is the balance right between these different types of approach, as explained in the draft plan? (yes / no) a. If not, which proposed measures would you change, and why?

Consultation Question 8

Are there other proposed measures that should be included? (yes / no). If yes, please explain what they are and why they should be included.

Consultation Question 9

How can you support the work set out in the draft flood risk management plan to reduce flood risk?

As well as draft flood risk management plans, the Environment Agency and Natural Resources Wales are consulting on draft updates to river basin management plans as part of the Water Framework Directive, which set out measures to improve water in rivers, lakes, estuaries, coasts and in groundwater.

Consultation Question 10

Are there things you think should be done to improve co-ordination of river basin and flood risk management planning?

Strategic Environmental Assessment Consultation Questions

Consultation Question 11

Do you agree with the conclusions of the environmental assessment? (yes / no). If not, please explain why.

Consultation Question 12

Are there any further significant environmental effects of the draft plan which you think should be considered? (yes / no). If yes, please describe what they are.

We have described potentially 'negative effects' of the draft plan on the environment which would need mitigation, as well as wider opportunities to achieve 'positive effects'.

Consultation Question 13

Are there further mitigations or opportunities that should be considered for the plan? (yes / no). If yes, please give details.

Responses received during the consultation will be used to amend and finalise the Flood Risk Management Plans for their publication on 22nd December 2015.

This document is intended to provide a summary of the responses received through the consultation on the draft plans and indicate how we will take those responses into consideration for the final plans. This document covers the whole of Wales so reflects responses received on the whole of the Western Wales Flood Risk Management Plan and the Welsh parts of the Severn and the Dee Flood Risk Management Plans.

The draft Flood Risk Management Plans for Wales can be accessed via the following page:

<http://naturalresources.wales/about-us/consultations/our-own-consultations-closed/consultation-on-draft-flood-risk-management-plans-for-wales/?lang=en>

2. Summary of responses

47 separate responses were received to the consultation on draft Flood Risk Management Plans in Wales, 12 for the Dee River Basin District, 13 for Western Wales and 14 for the Welsh part of the Severn. There were also 8 general responses received that were applicable to all the plans. The following pages set out our initial response to the comments received.

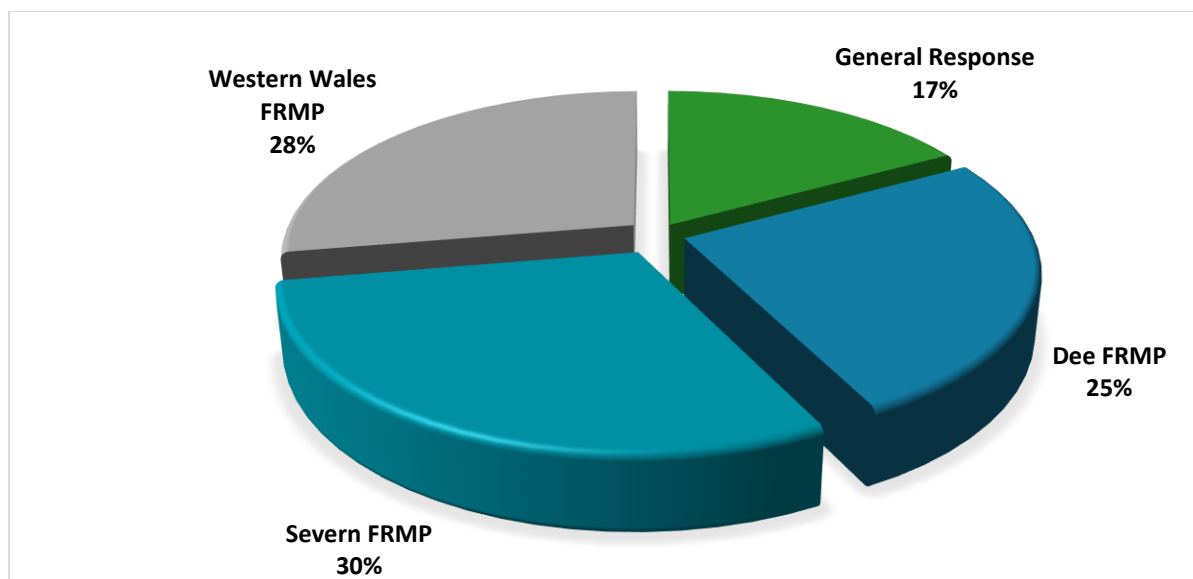


Figure 1: Proportion of responses per draft Flood Risk Management Plan

Dee Flood Risk Management Plan – summary of responses

- 54% of respondents agreed that the draft Dee Flood Risk Management Plan sets out the most significant flood risk issues.
- 85% of respondents understood the objectives contained in the draft Dee Flood Risk Management Plan.
- 46% of respondents felt the balance was right between ‘social’, ‘economic’ and ‘environmental’ objectives. 39% disagreed and 15% didn’t respond.

- In response to the question of if there are other flood risk management objectives that should be included, respondents were divided with 46% thinking that others should be included and 46% thinking that others are not needed.
- 77% of respondents understood the difference between on-going, agreed and proposed measures in the draft plan.
- In response to the question on the balance across the measures, there were mixed responses: 38% of respondents felt the balance was not right, 31% felt it is right and 31% did not express a view. Those respondents that felt the balance was not right felt there should be a greater emphasis on prevention measures and that there should be a greater integration of natural processes into flood risk management.
- 77% of respondents felt that there were other measures that should be included in the plan. The additional measures suggested include: closer working with other RMAs; forestry grants; Natural Flood Management; making space for water; improving arable farming practices; and realistic payments for farmers for environmental schemes.

Severn Flood Risk Management Plans – summary of responses

- 58% of respondents agreed that the draft Severn Wales Flood Risk Management Plan sets out the most significant flood risk issues.
- 79% of respondents understood the objectives in the draft plan.
- 50% of respondents felt the balance is not right between the ‘social’, ‘economic’ and ‘environmental’ objectives in the draft plan. 43% felt the balance is right and 7% expressed no view.
- 43% of respondents felt that there are additional objectives that should be included in the plan. The additional objectives suggested include: climate change; natural flood management; links to the RBMP and working with others.
- 72% of respondents understood the difference between on-going, agreed and proposed measures in the draft plan.
- 44% of respondents agreed the balance is right between the types of measures as explained in the plan. 28% did not agree and 28% did not have a view.
- 57% of respondents felt that there were additional measures that should be included in the plan. The additional measures suggested include: realistic payments for farmers for environmental schemes; closer working with other RMAs and Natural Flood Management.

Western Wales Flood Risk Management Plan – summary of responses

- 53% of respondents agreed that the draft Western Wales Flood Risk Management Plan sets out the most significant flood risk issues.
- 88% of respondents understood the objectives in the draft plan.
- 47% of respondents agreed the balance is right between ‘social’, ‘economic’ and ‘environmental’ objectives. 41% did not agree and 12% did not have a view.
- In response to the question of if there are other flood risk management objectives that should be included, respondents were divided with 47% thinking that others should be included and 47% thinking that others are not needed.
- 81% of respondents understood the difference between on-going, agreed and proposed measures in the draft plan.
- 47% of respondents agreed the balance is right between the types of measures as explained in the plan. 29% did not agree and 24% did not have a view.

- 59% of respondents felt that there were additional measures that should be included in the plan. The additional measures suggested include: closer working with other RMAs; realistic payments for farmers for environmental schemes; Natural Flood Management, investigating options for reservoirs; forestry grants; and certain local community specific measures.

3. List of Respondents

33 separate organisations and interested parties responded to the draft Flood Risk Management Plan consultation. The table below shows which responded to which draft Flood Risk Management Plan (FRMP) covering Wales.

Data protection prevents naming individuals who have not given permission for their details to be made public. A copy of the responses is available on request.

Organisation	General response	Dee FRMP	Severn FRMP	Western Wales FRMP
ADA Cymru	Y			
Caerphilly County Borough Council			Y	
Caldicot & Wentlooge Levels IDB			Y	
Ceredigion County Council				Y
City and County of Swansea				Y
CLA Cymru		Y	Y	Y
Coed Cymru		Y		Y
Confor		Y	Y	Y
Conwy County Borough Council		Y		Y
Dwr Cymru Welsh Water	Y			
Energy UK				Y
Farmers' Union of Wales	Y			
Flood Prevention Society	Y			
Gwent Wildlife Trust			Y	
Individual				Y
ICE Wales			Y	
Merthyr Tydfil County Borough Council			Y	
Middle Dee Partnership		Y		
National Farmers Union Cymru		Y	Y	Y
Natural England		Y	Y	

Organisation	General response	Dee FRMP	Severn FRMP	Western Wales FRMP
Natural Resources Wales		Y	Y	Y
Newport City Council			Y	
Powys County Council			Y	
Keep Wales Tidy	Y			
RWE Innogy UK Ltd				Y
Snowdonia National Park Authority		Y		Y
Tidal Dee Partnership		Y		
Tidal Lagoon Power		Y	Y	
Vale of Glamorgan County Borough Council			Y	Y
Wales Wild Land Foundation	Y			
Welsh Dee Trust		Y		
Welsh Local Government Association	Y			
Wildlife Trusts Wales	Y			
Total (47):	8	12	14	13

The respondents were recorded under the sectors that they represented. This included the following across the three draft Flood Risk Management Plans covering Wales:

- Agriculture and rural land management
- Angling, fisheries and conservation
- Business and industry
- Central Government
- Developer
- Forestry
- Individual
- Local Government
- National Park Authority
- Non-Governmental Organisation
- Professional Membership Institution
- Water Industry

Figure below shows the proportion, by sector, of the number of responses received.

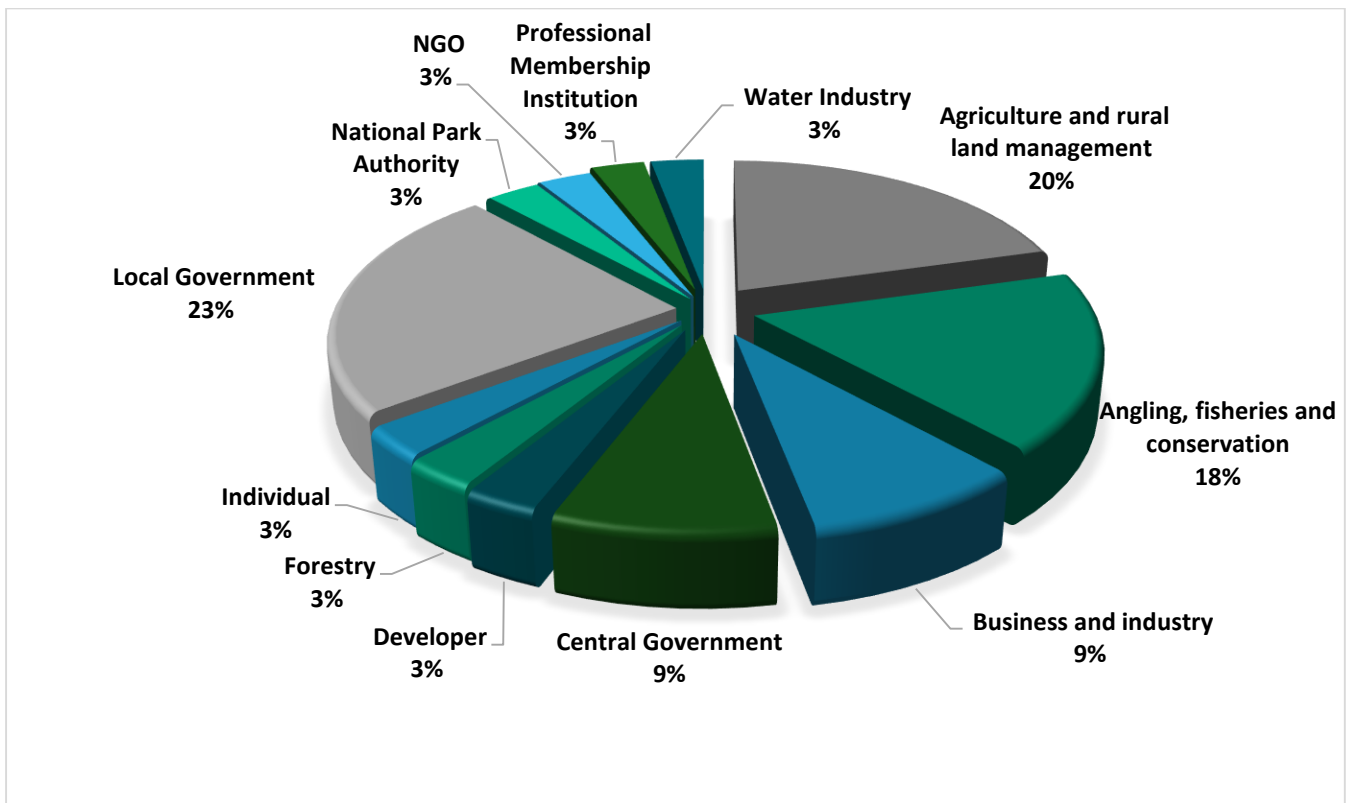


Figure 2: Percentage of respondents according to sector

4. Overview of key issues raised and our response

We have summarised the responses under topic areas and presented the action we have taken or will take before finalising the plans in relation to these topic areas. These are the key themes that apply to all three draft Flood Risk Management Plans in Wales.

Theme: Climate change

Consultation comments: Some respondents noted that there is very little reference to climate change and the potential impacts on flood risk, particularly from the risk of sea level rise.

Action for FRMP: Climate change is out of scope in the requirements for this first cycle of the Floods Directive but will be required for the second cycle. The plans have been amended to explain this along with an additional climate change section added to the RBD section of each plan. In addition, consideration of the future has been added into the Welsh Objectives so climate change is captured through the objectives.

Theme: Definitions

Consultation comments: Respondents raised that definitions are needed for 'working with natural processes', 'ecosystem approach' and 'resilience'. There also needs to be a clearer description of sources of flood risk, priority timescale and measure 'Progress of Implementation'.

Action for FRMP: Improved definitions have been added to the glossary of all three Flood Risk Management Plans. Improved descriptions of source, priority timescales and progress of implementation has also been added to each plan.

Theme: Land management

Consultation comments: Some respondents felt that agriculture and the rural economy should be a priority for local flood risk management and existing schemes, efforts and cross compliance requirements that are already in place for farmers to manage soils should be referred to. Land use change and management should be the priority to help reduce flood risk in areas where these will make a useful contribution but communities must be consulted first

Action for FRMP: We prioritise our flood risk budget in accordance with the investment policies set out by the Welsh Government in their National Flood and Coastal Erosion Risk Management Strategy and therefore prioritise our resources on where the risk to people and property is highest. We feel the measures set out within the plans reflect this. We have improved the text in each of the plans to reflect emerging policy in Wales from the Environment Bill, particularly that of Natural Resources Management and how this will improve the way we manage flood risk in Wales.

Theme: Link to River Basin Management Plans (RBMPs)

Consultation comments: Many respondents felt that there should be improved linkages between the draft FRMPs and RBMPs. One respondent felt that NRW should aim for one single holistic RBD plan that provides the framework for all relevant plans (RBMPs, FRMPs, local FRMPs, Shoreline Management Plans, etc) to deliver efficiencies and ensure no contradictory measures. Others also felt that NRW should look to hold regular meetings between all Risk Management Authorities so information can be shared and co-ordinated across functions where possible. There needs to be better cross over between the Flood Directive and Water Framework Directive, particularly where conflict exists.

Action for FRMP: We have demonstrated better integration between FRMPs and RBMPs in Wales by introducing a set of six National measures that are present in both plans and are focused upon delivering the objectives of both Directives. We have also improved the text within the FRMPs on links between the plans and introduced a new FRMP objective on the delivery of RBMP measures. We will continue to review internal processes and links to help better identify links for delivery from an operational perspective.

Theme: Natural Flood Management

Consultation comments: Many respondents felt that the benefits of natural flood management are included but more 'location specific' measures should be included in the plans. Some respondents felt that options should be taken on a case by case basis with more effort made to engage and communicate with landowners / interested parties on the options and benefits. One respondent suggested that spatial mapping should be performed in Wales to identify opportunities for woodland creation and associated benefits.

Action for FRMP: Opportunities for woodland creation maps have been developed for Wales and will be published shortly. The FRMPs have been updated to include reference to these maps along with a new River Basin District measure encouraging woodland creation with flood risk management benefits on the basis of these maps.

Theme: Objectives

Consultation comments:

The following were raised as potential additions to the Flood Risk Management Plan objectives:

- there should be objectives on working with others and / or partners; climate change adaptation; and co-ordinating our work more effectively with others so that there is an integrated approach to overall water management for the benefit of people, the environment and the economy;
- the objectives should take a more environmental focus. There is only one objective focusing on the natural environment and the ecosystem approach needs to be fully embedded and not just a bolt on;
- the objectives should explicitly mention reducing loss of life; and
- there should be a specific objective focused on integrating with the RBMP.

Action for FRMP: We feel the Flood Risk Management Plan objectives are really important to get right. We have reviewed the current objectives in light of the consultation comments received and have introduced a new objective for delivering against RBMP measures. We have also amended the objectives where appropriate so there is a forward focus to give consideration to climate change.

The themes discussed above were the key issues raised across the three Flood Risk Management Plans covering Wales. Further summary and analysis can be found in the appendix. In addition, the next section outlines feedback in relation to each specific River Basin District.

Dee River Basin District Flood Risk Management Plan – summary of comments received (covering the River Basin District, Catchments and Measures)

Respondents felt that there were certain important aspects missing from the River Basin District summary for the Welsh part of the Dee, particularly the impacts of urbanisation on flood risk, flash flooding, soil drainage capacity and long duration flooding. It was also suggested that there could be two new River Basin District scale measures added to the plan. We will consider further the comments received and where appropriate will incorporate into the final Flood Risk Management Plan.

Respondents noted omissions in the catchment section in relation to the impact of changes in rural land use on flood risk and that there is no reference to ancient woodland present within the District. We will amend this for the final plan.

In relation to the measures within the plan, respondents felt there needed to be a greater emphasis on measures that reduce flood risk through natural methods. This is something we agree with and will strengthen in the final plan. Respondents also flagged that the plan, and particularly the measures within the plan, needs to remain flexible enough to enable opportunities that might arise for good flood risk management outcomes. We agree with this sentiment and will review the plan annually so we are able to capture opportunities as they arise.

Severn River Basin District Flood Risk Management Plan – summary of comments received (covering the River Basin District, Catchments and Measures)

Respondents felt that there were certain important aspects missing from the Severn River Basin District summary, particularly reference to the importance of the agricultural industry and the real flood risk issues (flooded roads, disruption to local businesses, loss of

produce) in the Upper Severn area. We agree with the feedback received and will amend the summary for the final plan.

Respondents noted omissions in the catchment sections in relation to Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and reference to the IDBs becoming part of NRW in the Usk and Eastern Valleys catchments. Respondents also noted the omission of the importance of arable or dairy production in the Upper Severn catchment. We will amend these omissions for the final plan. In addition, respondents raised queries in relation to aspects of the catchment summaries which we will clarify for the final plan.

In relation to the measures within the plan, respondents raised concerns about the balance of different types of measures within certain catchments. We will review this for the final plan and try and clarify the types of measures that fall into each of the measures categories (being those of Protection, Prevention, Preparedness, Recovery & Review). It was also raised that the timescale for measure priority is unclear so we will address this in the final plan.

Respondents suggested a number of new measures that would be most appropriate at River Basin District scale around the need for innovative solutions for flood risk, working with stakeholders and using their local knowledge and clarification of riparian responsibilities. We will review the suggested measures and consider inclusion for the final plan.

Western Wales River Basin District Flood Risk Management Plan – summary of comments received (covering the River Basin District, Catchments and Measures)

Respondents felt that there were certain important aspects missing from the summary for the Western Wales River Basin District. This includes the impermeability of the urban environment, the importance of improving flows through the lower reaches of catchments within the district and a better reflection of the current land use through the district. We will consider further the comments received and where appropriate will incorporate in the final Flood Risk Management Plan.

Respondents noted an omission in certain catchment sections in relation to long duration flooding and the issues arising from it. Respondents also noted that more natural flood management measures are needed in the plan. We will address these comments in the final plan.

Respondents require clarification on certain measures within the plan and we will clarify these in the final plan. Respondents also suggested new measures which require further consideration before the plan is finalised.

Summary of responses to the Environmental Reports for the Flood Risk Management Plans

Alongside each of the Flood Risk Management Plans an Environmental Report was published that documented the potential significant negative and positive effects of the measures proposed by the plans. This is part of the Strategic Environmental Assessment (SEA) process. NRW worked closely with the Environment Agency in assessing the potential effects of the cross border plans. We will address responses to the consultation received where they are relevant to the Welsh parts of the RBDs. The Environment Agency will be addressing responses relevant to the English parts of the RBDs.

A summary of the comments received to the SEA questions and the actions we are taking is set out below. Statements of Environmental Particulars will also be published alongside the final FRMPs demonstrating how environmental considerations have been integrated into the plan and how the results of consultations have been taken into account.

Respondents were concerned at the lack of a Habitats Regulations Assessment (HRA) being published alongside the draft plan to inform the Environmental Report and development of the plan. We agree that the HRA should take place alongside the preparation of the plan and one is being undertaken alongside the preparation of the final plan. The HRA will be completed in advance so that it influences the finalising and approving of the FRMPs. We are consulting within NRW (Strategic Assessment Team) and Natural England on HRA's drafting and influence on finalising and approving the FRMPs.

There was concern that the proposals for monitoring the significant effects of the plan were too focussed on River Basin Management Plan Monitoring which would not pick up wider effects on environmental receptors. We will be considering in greater detail the monitoring we propose to undertake of the significant effects of the plan and this will be documented in the Statement of Environmental Particulars.

Respondents made comments on the transparency of effects on environmental receptors when they have been considered under Ecosystems Services. We are confident that all receptors set out in SEA legislation have been considered in the Environmental Report. The comments made by consultees will feed into our lessons learned as the methodology we are using is evolving and being developed under NRW's Integration of Natural Resource Management Transformation Programme. This work will also take into account emerging legislation such as the Environment Bill, Well Being of Future Generations Act and the Planning (Wales) Bill.

Some respondents requested greater clarity on the avoidance, reduction and mitigation of effects on specific receptors, other respondents were confident that mitigation measures would be picked up at the project level through EIA. We will set out our commitment to undertake environmental assessment of our projects under NRW policy and under relevant legislation in the Statement of Particulars and the final FRMPs.

Comments in relation to the SEA were received regarding links with RBMPs and delivery of Natural Flood Risk Management (NFRM), flood attenuation and storage. The SEA can only assess the measures that are proposed by the plan itself. We consider all relevant NFRM options at the more detailed, local project level, with the option appraisal process informed by an environmental impact assessment of the technical and economic business case for each project. The measures within each FRMP will reinforce the delivery of that options assessment process. The final plans will aim to be more integrated with RBMPs and seek opportunities for delivery of NFRM (see above comments on themes).

5 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 will be used to inform the development and delivery of the final Flood Risk Management Plans. The final version of these plans will be published on our website by the 22nd December 2015.

Annex 1

Additional theme comments

Theme: Biodiversity

Consultation comments: Some respondents felt that there was not enough reference in the plans to biodiversity or protected areas.

Action for FRMP: We have improved the text in the plans to explain the Environment Bill and the benefits for biodiversity in Wales through emerging Natural Resource Management.

Theme: Consenting

Consultation comments: Some respondents felt that there needs to be a simpler method of applying for consent for rural maintenance work and there needs to be greater support from NRW to individuals who wish to undertake maintenance work themselves.

Action for FRMP: No action necessary for the FRMPs as current RBD measure to cover this area of work will remain appropriate once the Environmental Permitting Regulations go live in April 2016.

Theme: Recovery and Review

Consultation comments: Some respondents suggested that there should be more recovery and review actions contained within the plans.

Action for FRMP: We have added improved text to the plans to explain our recovery and review remit. There will always be a limited number of recover and review actions within the plans as these will mainly be reactive measures.

Theme: Working with others

Consultation comments: Some respondents felt that flood risk management should be completely integrated into catchment partnerships to ensure greater benefits for all. The plans should be delivered in partnership where it is possible to do so.

Action for FRMP: We have added text to the plans on the emerging Environment Bill, particularly regarding Natural Resource Management. Within this addition, we have described the NRW catchment pilots and future work direction.

Annex 2

Question Statistics

Dee Flood Risk Management Plan – consultation question summary response

Consultation Question	1	3	4	5	6	7	8
Yes	54%	85%	46%	46%	77%	31%	77%
No	38%	15%	39%	46%	8%	38%	8%
No Response	8%	0	15%	8%	15%	31%	15%

Severn Flood Risk Management Plan – consultation question summary response

Consultation Question	1	3	4	5	6	7	8
Yes	58%	79%	43%	43%	72%	44%	57%
No	21%	14%	50%	43%	7%	28%	29%
No Response	21%	7%	7%	14%	21%	28%	14%

Western Wales Flood Risk Management Plan – consultation question summary response

Consultation Question	1	3	4	5	6	7	8
Yes	53%	88%	47%	47%	81%	47%	59%
No	41%	12%	41%	47%	6%	29%	29%
No Response	6%	0	12%	6%	12%	24%	12%



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