

## REPORT OF PLANNING OFFICER (PARK DIRECTION)

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### SUBJECT: FLOOD AND COAST INVESTMENT PROGRAMME (FaCIP)

#### Purpose of Report

To ask Members to agree the Authority's response to the Welsh Government on the Flood and Coast Investment Programme consultation.

#### Introduction/Background

This consultation is to consider the way that the Welsh Government allocates funding for flood and coastal erosion risk management in Wales and is intended to ensure that it focuses on those places with the greatest risk. It proposes a new way to prioritise funding according to national priority and establish a Flood and Coastal Erosion Risk Management Investment Programme, using a national Flood Risk Index. This will combine multiple sources of flood and erosion risk to allow comparison in different places.

Currently flood and erosion budgets are split between Natural Resources Wales (67%) and Local Authorities (33%), with 55% of the overall budget being used for revenue funding including maintenance and staffing. Funding is currently determined by applications to address risk identified within each risk management authority. The new Flood and Coast Investment Programme will initially use the Welsh Government's capital budget to address all forms of flood risk management, with the intention to include some of the revenue budget once the scheme is fully established.

To assess risk, it is proposed to consider:

- The likelihood of an event happening; and
- The consequences that will result if the event occurs

Available information is varied and constantly changing but it is recognised that to demonstrate on a national scale the distribution and relative risk, the rankings must be produced using nationally consistent datasets. It is proposed to use a range of datasets which consider sea, river and surface water flooding. Coastal erosion will be scored differently reflecting that it is a different process. In addition where local datasets are available and considered to be better than national datasets, these can be used in the application or allocation process to support or override the risk index.

The index is intended to be a high level national indicator of combined flood and erosion risk, and not a precise measurement of local risk.

When assessing flood risk existing defences will not be taken into account as the available data on their effectiveness and physical condition is not wholly reliable and available. This would also allow ranking of *maximum natural risk*, and a consistent national approach. Defence data will be used at local level to inform scheme appraisal and the allocation process.

“Risk to life” will always be the most significant factor in determining priority of investment. Wider social, environmental and economic risk will be scored with lower weightings and incorporated through the application process. It is intended therefore to score the combined risk index against the number and type of property at risk. The number of homes will be given a higher weighted score with other land and property such as agriculture, offices and shops given lower weighting.

It is proposed to use Lower Super Output Areas (approximately 1500 homes) as the spatial unit for the flood assessment. Coastal erosion scorings will be provided alongside to calculate overall risk. It is then proposed to group areas according to the level of risk (eg top 5% or top 30 areas) which will help account for error margins and avoid specific areas being labelled as ‘the most at risk in Wales’.

It is intended that a Flood Risk Index will focus attention to areas where risk is considered greatest and therefore prioritise these areas for funding. Other funding sources will also continue to be sought. Effective risk management will require input from everyone associated with the risk with multiple authorities, agencies and the public.

### Summary Findings

A draft response to the consultation is set out in the attached response form (Appendix A). The response generally favours the proposed approach and acknowledges the need for a pooling of resources and means of prioritising funding. The approach also needs to ensure that the rural areas are not overly compromised by the demands of coastal towns and cities with their greater concentration of assets and population. With an emphasis on dealing with ‘risk to life’ it is also important to ensure that resources are directed to deal with houses across the social spectrum and not aimed that those with the highest monetary value.

It is also crucial to continue to address the need to direct new development, particularly vulnerable development, away from the ‘at risk’ areas. As sea-level rises then these areas will continue to change and we will also need to adapt some of our communities to either live with increased flooding or move away from those areas where it becomes unsustainable to continue to defend them from flooding.

### Recommendation

**That the consultation response to the Welsh Government on the Flood and Coastal Investment Programme be agreed.**

#### Background Documents

Flood and Coast Investment Programme Consultation Document -

<http://wales.gov.uk/consultations/environmentandcountryside/flood-and-coast-investment-programme-facip/?lang=en>

*(For further information, please contact Sarah Middleton)*

*Author: Sarah Middleton*

**Consultation Response Form**

**Consultation closing date: 6<sup>th</sup> March 2015**  
**Your comments must reach us by that date**

**Flood and Coastal Investment Programme**  
**(FaCIP)**

This consultation seeks views on our proposals to change the way the Welsh Government allocates funding for flood and coastal erosion risk management in Wales.

We want to make flood risk investment clearer and more consistent. We want to help identify at-risk areas so that long-term planning can commence and appropriate schemes and land management put in place. In doing so we hope to raise awareness of flooding in those areas, reduce risk and build resilience in communities.

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Welsh Government will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

<b>Please tick if you want us to keep your response confidential.</b>	<input type="checkbox"/>
Reason for confidentiality:	

Name: Sarah Middleton	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable):Pembrokeshire Coast National Park Authority	

Address: Llanion Park, Pembroke Dock, Pembrokeshire SA72 6DY

Please mark the box that best describes you as a respondent. If 'Other', please specify in the box below.

<input type="checkbox"/>	Child/Young Person	<input type="checkbox"/>	Adult	<input type="checkbox"/>
<input type="checkbox"/>	Local Authority	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
<input type="checkbox"/>	Natural Resource Wales	<input checked="" type="checkbox"/>	Other	<input type="checkbox"/>

Please Specify: National Park Authority

Q1. Do you agree with the general need for a Flood and Coast Investment Programme as put forward in sections 2 and 3 above?

<input type="checkbox"/> Strongly agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree
<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	

Comments: It is rational to be able to direct scarce resources to areas most needing assistance to become more resilient to flooding and coastal erosion.

Q2. Do you have any comments on using the Programme for all aspects of flood and coastal erosion risk management in whatever way is most appropriate to address risk?

Comments: If the priority for spending is 'risk to life' then it needs to be assured that density of occupation as well as number of actual properties is considered. The value of the individual properties in monetary terms should be irrespective.

Whilst it is appropriate for funding to be directed to areas deemed to be at greatest risk through the methodology there is potential for remoter rural areas to lose out to larger coastal towns and cities which have a much greater number of assets and denser population. Thus the proposal to consider other social, economic and environmental factors is also important.

Over time it is essential that development – particularly vulnerable development – is prohibited within the risk areas. Even so with sea level rise it is likely that the risk areas will continue to change over time.

Q.3 Do you have any comments on the proposal for a National Index of Flood and Coastal Risk to help understand risk from all sources?

Comments: This would seem appropriate, although may have implications for insurance etc, even if a specific property is not liable to flooding within a wider 'at risk' area.

Q.4 Do you agree that a Flood Risk Index should remain a high level indicator of combined risk but allow local flood modelling to be used to support evidence in applications?

<input type="checkbox"/> Strongly agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree
<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	

Comments: The Index should be based on the best available data. Whilst the generic data will provide a strategic view, the addition of local data will assist with further targeting resources to the most at risk areas.

Q.5 Do you have examples where flooding has repeatedly occurred in a place currently shown as a low flood risk? Please provide relevant evidence as appropriate.

Yes

No

Not sure

Comments:

Q.6 Do you agree that information relating to defences should be excluded from the Flood Risk Index? Presence of defences could be shown on any map and included in the later appraisal stage.

Strongly agree

Agree

Neither agree nor disagree



Disagree

Strongly disagree

Comments: As the physical condition or suitability of existing defences is largely unknown the appropriate assessment initially would be to exclude them from consideration. The supplement of a local assessment can consider the effectiveness and lifespan of the defences as part of a detailed assessment.

Q.7 Do you agree with the approach to Coastal Erosion risk and that it should be marked separately to flood risk? If not, please provide an alternative suggestion.

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

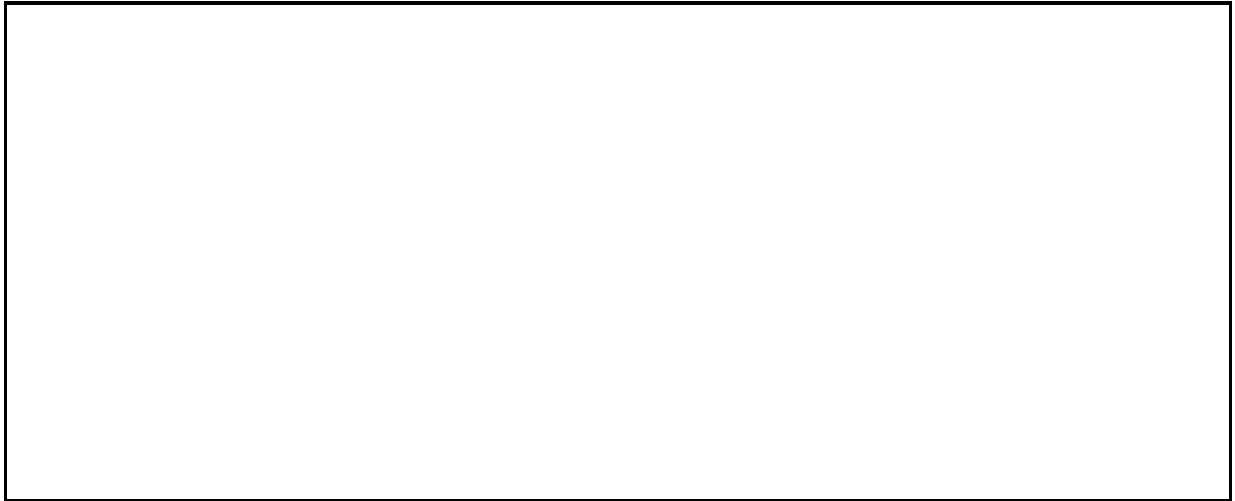
Comments: Flooding and erosion are separate process (albeit sometimes linked) and it seems reasonable that they are marked separately.

Q.8 Do you agree with the principles set out in Section 4.5 on assessing risk from multiple sources and scoring by Lower Super Output Areas (LSOA)? Do you have any comments or suggestions?

<input type="checkbox"/> Strongly agree	<input type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree
<input type="checkbox"/> Disagree	<input checked="" type="checkbox"/> Strongly disagree	

Comments: This level of area is used by Welsh Government analysis of a range of data and it would seem appropriate to use it for overall comparison purposes and to allow comparison of data on a like for like basis. It may, however not show smaller areas of high risk within a wider area. This is particularly pertinent where there is a narrow coastal strip backed by steeply rising ground which is a common feature around the Welsh coast. In rural areas it may also exclude whole villages at high risk within a wider area of no or small risk.

Q.9 Do you have any further comments on the presentation or development of the proposed Flood Risk Index?



Q.10 Do you have any comments or suggestions on the application process?

Comments:



Q.11 Do you have any comments or suggestions on the programme board or governance of a Flood and Coast Investment Programme?

Comments:

Q.12. Do you have any other comments that you would like to put forward?

Comments:

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

<b>Please acknowledge this reply.</b>	
E-mail address for acknowledgement:	

**Thank you for taking time to respond to this consultation.**

Completed responses should be sent to the address shown below by the 6<sup>th</sup> March 2015. The response form should be completed electronically if possible and sent to

[FloodCoastalRisk@wales.gsi.gov.uk](mailto:FloodCoastalRisk@wales.gsi.gov.uk) Alternatively, postal responses can be sent to:

David Sargent, Flood and Coastal Erosion Management, Flood and Water Division

Welsh Government, Cathays Park, Cardiff, CF10 3NQ.