

# Strategic & Spatial Responses to Flooding

## Final recommendations report

April 2024

Comisiwn Seilwaith Cenedlaethol Cymru  
(National Infrastructure Commission for Wales)

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# Contract

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This report describes work commissioned by the National Infrastructure Commission for Wales, by an instruction dated 27th July 2023. The Client’s representatives for the contract were Eluned Parrott, Eurgain Powell and Stuart Ingram of the National Infrastructure Commission for Wales. Jenny Broomby, Anne-Marie Moon, Neil Wiseman, Mary Baldwin, Lauren Prouse, Gwyn Jones and Tim Jones of JBA Consulting carried out this work.

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## Abbreviations

ACW	Arts Council of Wales
AMP	Asset Management Periods
AONB	Areas of Outstanding Natural Beauty
ASERA	Association of Severn Estuary Relevant Authorities
CaBA	Catchment Based Approach
DCWW	Dŵr Cymru Welsh Water
FCEC	Flood and Coastal Erosion Committee
FCERM	Flood and Coastal Erosion Risk Management
FWMA	The Flood and Water Management Act
LLFA	Lead Local Flood Authority
MoU	Memorandum of Understanding
NBS	Nature-Based Solutions
NFM	Natural Flood Management
NFU	National Farmers Union
NRW	Natural Resources Wales
RFCC	Regional Flood and Coastal Committee
RMA	Risk Management Authority
SEP	Severn Estuary Partnership
SFS	Sustainable Farming Scheme
WBFGA	Wellbeing of Future Generations Acts
WFD	Water Framework Directive
WNHSC	Welsh NHS Confederation
WLGA	Welsh Local Government Association

# Executive Summary

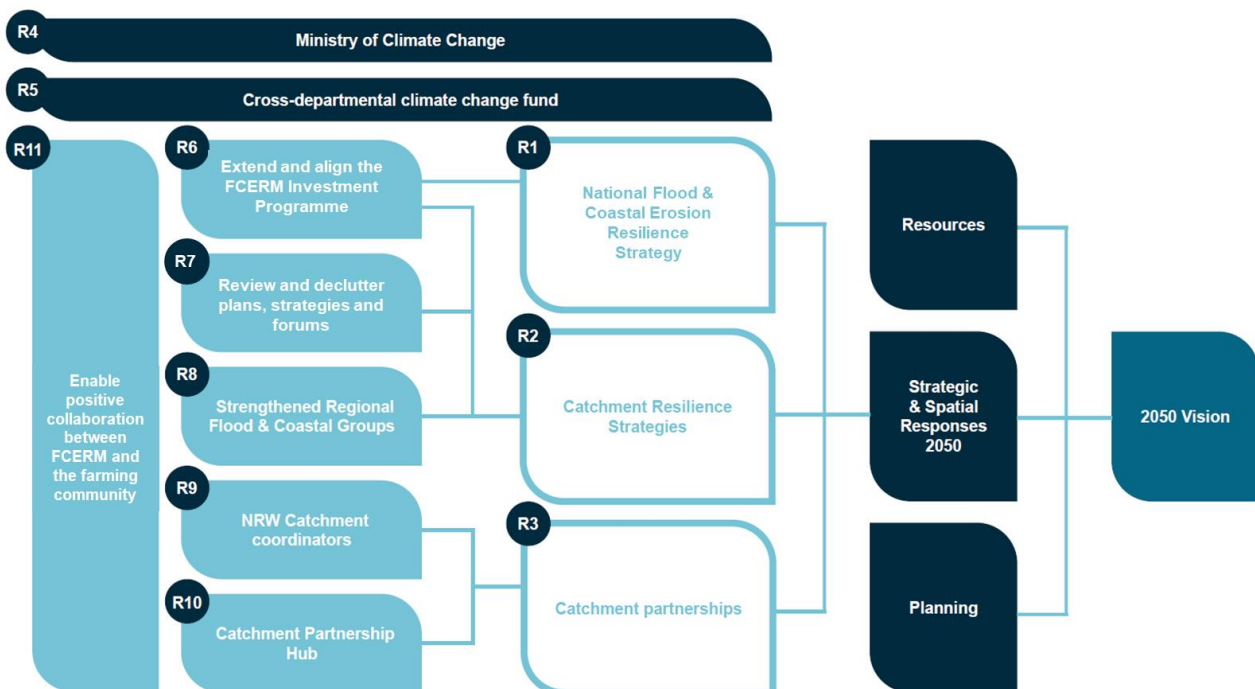
This report outlines recommendations for more strategic and spatial approaches to mitigating and adapting to flood risk in Wales. The recommendations include 5 'primary' recommendations, reinforced by 'supporting' recommendations:

## Primary recommendations

- R1: Develop a National Flood & Coastal Erosion Resilience Strategy
- R2: Streamline FCERM plans into Catchment Resilience Strategies
- R3: Set up a framework for catchment partnerships
- R4: Establish a Ministry of Climate Change
- R5: Setup a cross-sector climate change adaptation fund

## Supporting recommendations

- R6: Extend and align the FCERM Investment Programme
- R7: Review and declutter plans, strategies and forums across the spectrum in Wales
- R8: Strengthen the role of existing regional flood groups and coastal groups
- R9: Establish NRW Catchment Coordinators
- R10: Fund and set up a national catchment partnership hub
- R11: Enable positive collaboration between FCERM and the farming community



The challenge from the National Infrastructure Commission for Wales was to "be radical" and to think beyond the current frameworks and practices in place in FCERM. To this end, the recommendations are not necessarily all solutions that could be actioned in the short term, they outline alternative approaches to current structures that could require significant changes. Where a proposed approach would require or benefit from a change to legislation, this has been identified.

# 1 Introduction

## 1.1 Background

The National Infrastructure Commission for Wales (NICW) was asked by the Welsh Government in the 2021 Co-operation Agreement to "*conduct an assessment of how the nationwide likelihood of flooding of homes, businesses and infrastructure can be minimised by 2050*". After carrying out a scoping study earlier in 2023, the Commission wrote to the Welsh Government outlining its plans to split the assessment into 4 research workstreams:

1. developing a vision for flood risk management;
2. exploring the options for coordinated strategic and spatial responses to flood management;
3. the funding and workforce resources needed; and
4. quantifying and analysing the land use planning issues associated with flooding.

From these workstreams and other NICW activities, the programme collectively seeks to achieve the following:

- A shared vision for 2050 and beyond on how we wish to enhance resilience and adaptation planning to the risks from flooding in the context of climate change given the increased impacts that we are going to see.
- A plan so that homes, communities, businesses, and infrastructure are more resilient and adaptive to flood events and associated climate risks and are able to recover more quickly.
- Stakeholders understand the likely impacts and where responsibilities sit in terms of response/ action.
- People (including those with protected characteristics) understand, feel prepared and able to respond to future flooding and climate risks.
- Suggested approaches to strengthen collaboration and partnership working amongst organisations and agencies as well as involvement of, and increasing resilience of, communities.

The programme will ultimately result in a report from the Commission to the Welsh Government, with recommendations to Welsh Ministers on how improvements can be made to flood management systems and frameworks in Wales, taking that longer-term view to bring about change.

This project relates to workstream 2: "*exploring the options for coordinated strategic and spatial responses to flood management*".

## 1.2 Aim of this workstream

This workstream seeks to examine why flood risk, mitigation and adaptation planning practices are not yet happening on a catchment and coastal-zone scale across Wales and to make strong recommendations as to how this situation can be improved.



It has reviewed existing catchment planning and other spatial/strategic practices currently occurring across Wales to learn the lessons from existing partnerships. This study will look to pinpoint barriers and seek to make radical recommendations on how these may be overcome and explore structures and resources to better enable strategic, integrated partnership working at a catchment / coastal zone scale.

### 1.2.1 Objectives

- Review existing catchment planning and other spatial/strategic practices currently occurring across Wales to learn lessons from existing partnerships.
- Explore structures, resources, models and approaches for enabling strategic, integrated partnership working at catchment / coastal zone scale to deliver strategic integrated flood risk management and enabling climate adaptation.
- Explore at a national 'overview' level and deliver two work-through case study examples of current practice in Wales.

## 1.3 Radical approaches

The Commissioners have challenged the JBA team to approach this research freely and radically. They have actively encouraged the team and stakeholders to unchain themselves from current frameworks and practices, thinking as widely as possible. To this end, the recommendations in this report consider what strategic and spatial approaches to flooding would be suggested if we were to "start again". The recommendations are therefore not necessarily all solutions that could be actioned in the short term, they outline alternative approaches to current structures that could require significant changes. The report outlines the existing situation, identifies current issues and barriers and then provides recommendations for a way forward.

## 2 The current picture

### 2.1 FCERM responsibilities

Figure 2-1 taken from the Welsh Government's latest National Strategy for flood and coastal erosion risk management (FCERM), depicts the roles and responsibilities of different risk management authorities (RMA) in Wales for FCERM. These are mandated by the Flood and Water Management Act (FWMA) (2010), and the European Union (EU) Flood Risk Regulations 2009, which were recently revoked following Brexit. The figure highlights the different responsibilities bodies have according to the different sources of flood risk).

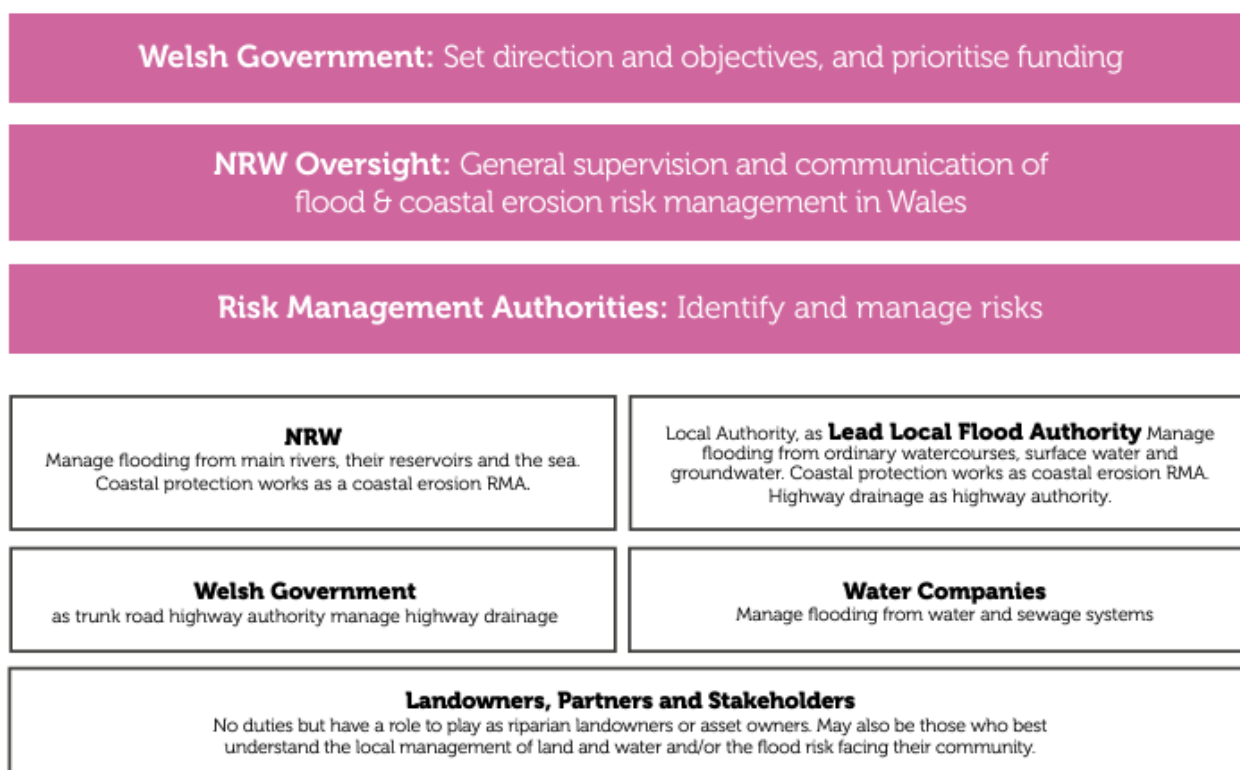


Figure 2-1 - Roles and responsibilities for FCERM in Wales (Welsh Government, 2020)

Figure 2-2, also taken from the Strategy, shows the relationships between the groups and committees that exist in the FCERM sphere.

The Flood and Coastal Erosion Committee (FCEC) provides high-level advice to Welsh Ministers on all FCERM matters in Wales and works closely with RMAs and the Welsh Government. It sets out its programme of advisory activity (e.g. highlighting best practices, identifying research needs, and responding to consultations). It also carries out an independent review of the Section 18 report. This report is produced by Natural Resources Wales (NRW) as required by the FWMA 2010, and reports on the progress of implementing the national FCERM strategy.

Coastal Groups include representatives from Local Authorities, NRW, the Welsh Government and other bodies with coastal responsibilities (e.g. Network Rail). They are responsible for producing, implementing and monitoring the progress of the Shoreline

Management Plans, and therefore have a regional strategic overview of coastal management. The Wales Coastal Group Forum comprises chairs of each coastal group along with NRW, the Welsh Local Government Association (WLGA), the National Trust and Network Rail. Its role is to represent the collective interests of coastal groups and set the strategic direction of coastal groups.

There are three regional flood groups in Wales (South East Wales, South West Wales and North Wales), made up of lead local flood authorities (LLFAs), NRW, Dŵr Cymru Welsh Water (DCWW) and WLGA. They act as a forum to:

- Share expertise, experience, knowledge information & data
- Facilitate consultation on Local Flood Risk Management Strategies
- Exchange information and dialogue with Welsh Government including feedback to the Flood and Coastal Risk Programme Board

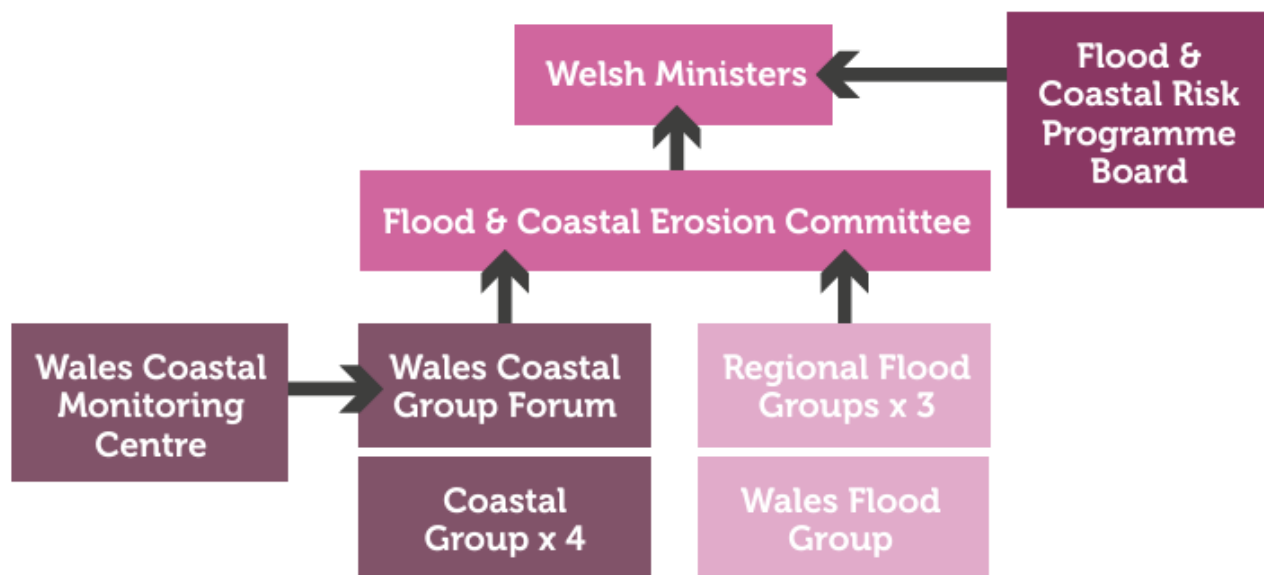


Figure 2-2 - Links between groups and committees (Welsh Government, 2020)

In addition to the above FCERM strategies, RMAs, groups and plans, there are other plans, strategies and forums that are inextricably linked to flooding and climate adaptation. These include:

- River Basin Management Plans
- Internal Drainage Districts
- NRW Area Statements
- Water Framework Directive (WFD) River Basin Management Plans (RBMPs)
- Public Service Boards (PSB)
- Corporate Joint Committees

## 2.2 Spatial approach

The spatial result of the split of roles and responsibilities is mapped in Figure 2-3. It shows a disconnected, misaligned, and complicated picture. Some boundaries, such as CJs and

PSBs will be less clear on the map due to them overlapping with the same political boundaries, such as local authorities.

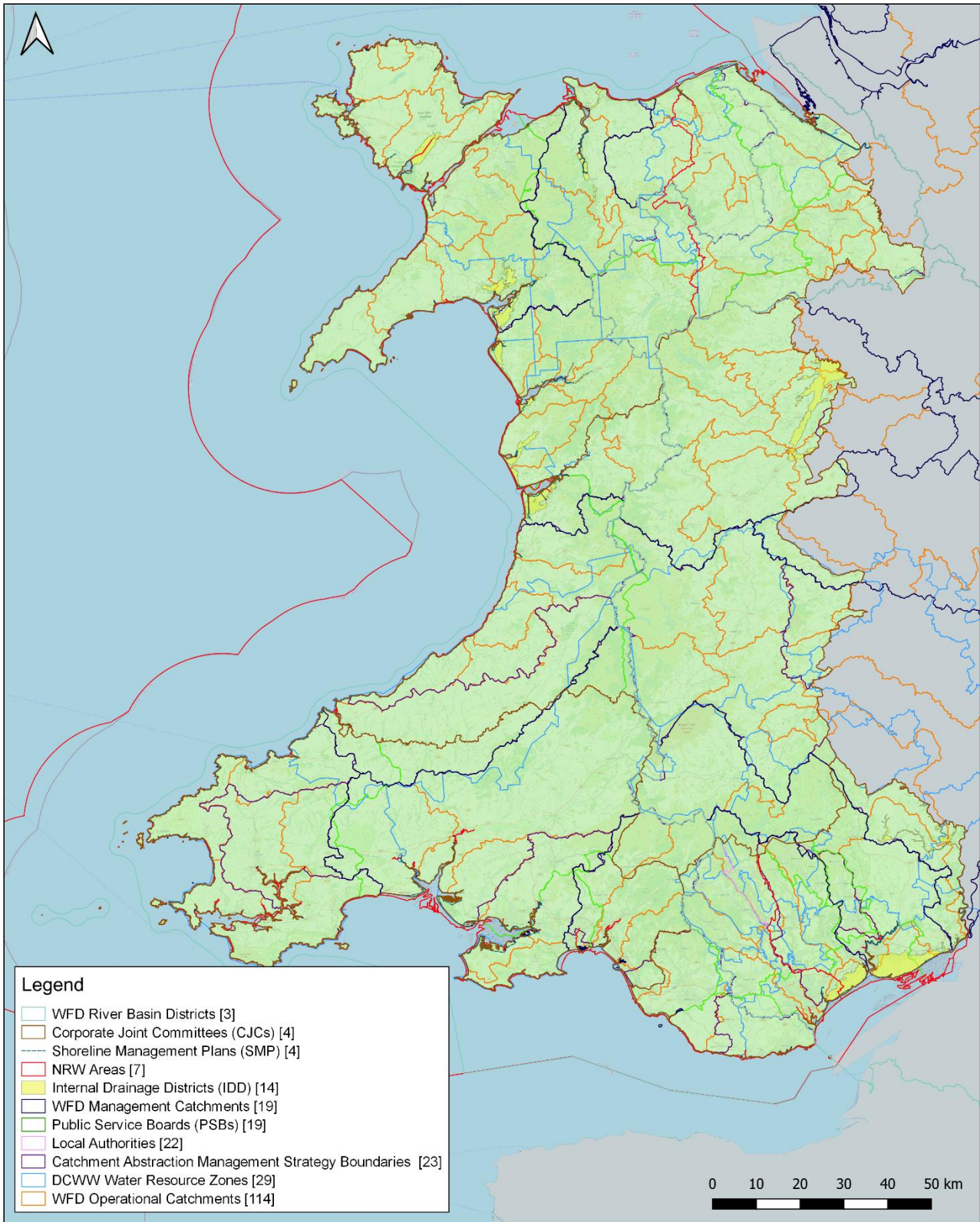


Figure 2-3 - Spatial boundaries of plans, forums and strategies across Wales



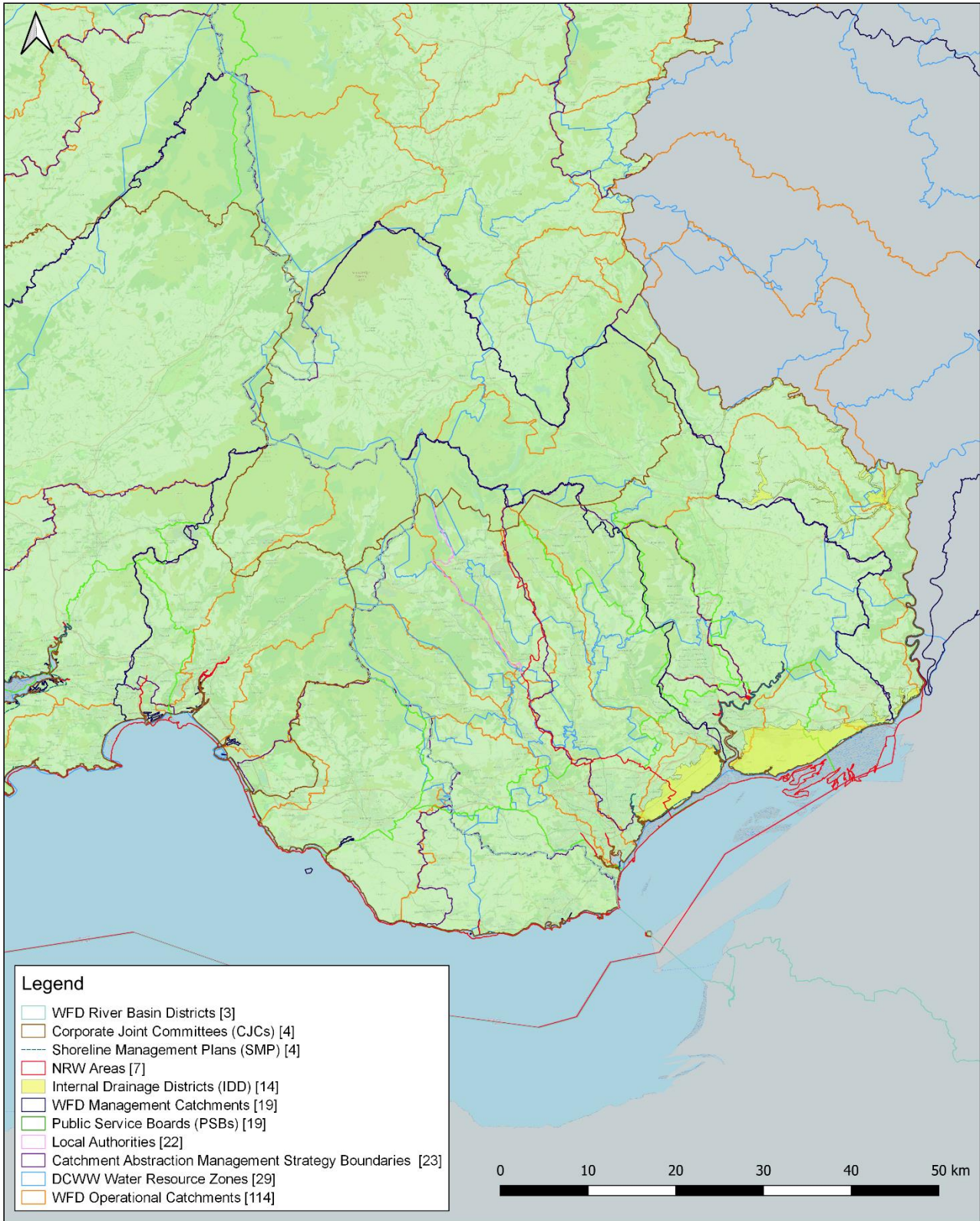


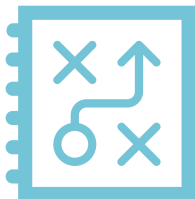
Figure 2-4 - Spatial boundaries of plans, forums and strategies in South East Wales

### 3 Identified Issues

The following issues with existing strategic, spatial and partnership approaches in FCERM were identified following a desk-based review and engagement with stakeholders including FCERM practitioners.

### 3.1 Legislation, policy, strategy & plans

#### 3.1.1 Lack of alignment between FCERM plans



The FWMA 2010 states that "*A relevant authority must co-operate with other relevant authorities in the exercise of their flood and coastal erosion risk management functions*". The term co-operate refers to a *connected* process that allows organisations to support one another without real shared ownership and responsibility. The term

'collaborate' on the other hand, implies a *collective* process with shared responsibilities and a common goal. The requirement for cooperation is contradicted by responsibilities being split according to different flooding types and the requirement for organisations to produce separate plans, emphasising the lack of a collective process. Instead, the reality is a loosely connected process between the RMAs and their plans and responsibilities. This leads to both overlap and gaps in FCERM delivery in Wales and inhibits truly strategic and spatial responses to flooding.

NRW's Flood Risk Management Plan (FRMP) has historically been required under the EU Flood Risk Regulations 2009. These regulations were revoked on 1st January 2024. The regulations required NRW to deliver a flood risk management plan, informed by preliminary flood risk assessments and flood hazard and risk maps. NRW's most recent FRMP brings together the aforementioned requirements as well as the objectives and measures set out in the Welsh Government's FCERM strategy, River Basin Management Plans (RBMP), Shoreline Management Plans (SMP), Area Statements (AS), and Welsh Government's FCERM Strategy, outlining the priorities for flood risk. It presents them at a national level and then for 6 place-based sections, mirroring NRW's area boundaries. Lead Local Flood Authorities (LLFAs) are required to deliver their local flood risk management strategies (LFRMS) under the FWMA 2010, Part 1, Section 10. This was also reflected in the revoked EU Flood Risk Regulations 2009. These plans are aligned with local authority political boundaries, leaving a mismatch between NRW and LLFA plans. These boundaries are also not aligned with natural catchment boundaries, meaning RMAs are left to deal with flood risk issues that could be better addressed further up the catchment, which often means crossing a political boundary. Fundamentally, there is a strategic and spatial misalignment between the FCERM plans and strategies that underpin our approach to managing flood risk. Combined with the separate responsibilities for different flooding sources, this leaves a disconnected and dysfunctional environment in which to attempt to deliver strategic and spatial responses to flooding.

This is compounded by the lack of a strategic overview of the plans and projects being delivered by the various RMAs. Unlike the Environment Agency in England which is responsible for developing and applying the National Strategy, as well as allocation of

government funding to all FCERM projects under the FWMA (2010), NRW have no routine line of sight of what local authorities are planning to deliver beyond the published list on the Welsh Government website, making it difficult to identify opportunities for collaboration early on. This means any current collaboration is done on an ad hoc basis, through individuals' goodwill or is simply viewed as trying not to directly conflict with others' schemes and programmes. Con

As well as plans being misaligned according to spatial boundaries, there is frustration from stakeholders regarding the timescales the plans are developed within. For example, the National FCERM Strategy is refreshed every 10 years, local authorities are working on a 1-3 year programme, and DCWW is on a 5-25 year programme. This makes aligning plans even more challenging.

There have been previous attempts and interest in developing single 'joined up' flood risk management plans from NRW, Welsh Local Government Association (WLGA), Welsh Government and Local Authorities. Unfortunately, however, after initial progress, the plans fell away due to RMAs feeling that they had to deliver separate statutory FWMA 2010 and Flood Risk Regulations duties first. This led to a lack of capacity and hence appetite to carry it through.

### 3.1.2 Existing strategic environment plans are too high-level and broad

Area Statements, Public Service Boards and Opportunity Catchments are perceived by stakeholders to be too broad and ambitious to lead to any real action on the ground that could complement or contribute to strategic and spatial approaches to flooding. Whilst not focused on flood risk management specifically, they are implicitly linked on account of their focus on sustainable management of natural resources, well-being of future generations and water quality respectively.

Area Statements were developed to be collaborative responses to the Welsh Government's Natural Resources Policy, published in 2017. They outline key challenges facing the area and describe what can be done to meet those challenges and how to better manage natural resources for future generations. The focus of each Area Statement varies; however, they generally include:

- Protecting and enhancing landscapes
- Building resilient ecosystems through the enhancement of biodiversity and green infrastructure
- Improving health and wellbeing through active lifestyles and connection with nature and places
- Delivering sustainable land and forestry management
- Mitigating and adapting to a changing climate
- Encouraging sustainable economies
- Working with water and natural processes
- Collaborative ways of working



Despite the broad topics listed above, multiple stakeholders described Area Statements as being "too ecological" and lack clarity on how their aims of "working with water" truly link with other flood risk management plans. They are also seen as being too broad and high-level, rendering them unachievable. Similar was said of Opportunity Catchments and Public Service Boards. Opportunity Catchments are selected as a suite of the best opportunities to address the Water Framework Directive (WFD). Public Service Boards were set up to improve joint working across all public services in each local authority area, with a focus on delivering responsibilities under the Well-being of Future Generations (Wales) Act. Whilst the theory, concept and drivers are understood by stakeholders, it's perceived that they have not delivered on their ambitions. They are judged to have the "right headlines and words", but it's not clear what this means in practice. It's felt there is a danger of focusing too much on the planning and not enough on the delivery. The spatial areas they cover were also highlighted as being too broad to lead to real action and there is a mismatch between the strategic, and spatial level of the plans compared to the structures and resources available to deliver on the ground. Similar to Section 3.1.1, PSBs and Area Statements also drew criticism from stakeholders for being structured by political and organisational boundaries as opposed to natural, catchment boundaries.

### 3.1.3 Perceived absence of long-term direction for adaptation and resilience

It's perceived that the Welsh Government are not sufficiently driving the agenda of adaptation and resilience. Wales' overall National FCERM strategy, as required by the FWMA (2010), was most recently published 3 years ago, but sets out a series of short-term deliverables and measures. Whilst there are statements on ambition for long-term adaptation in the strategy, the absence of long-term measures and targets means the focus remains on addressing short-term, present-day challenges. This is felt particularly in coastal settings, where there is a lack of guidance on coastal adaptation for groups to use as a blueprint for planning and delivery. The FWMA (2010), Part 1, Section 8 requires that the strategy specifies "the current and predicted impact of climate change on flood and coastal erosion risk management" but falls short of requiring objectives and associated measures for managing these risks, as it does for current flood risk. There is no reference to adaptation of resilience.

Similarly, stakeholders felt that the NRW flood risk management plan focuses on today's risks and does not focus enough on increasing future resilience for vulnerable communities in the longer term. This is resulting in a lack of plans coming forward for adapting to climate risk and where they are, they are facing barriers due to an absence of performance measures in this area. The focus remains on properties protected and not adaptation or resilience.



## 3.2 Funding



Findings from stakeholder interviews and desk-based research points highlight that fundamentally, a lot of siloed working and missed opportunities for partnership approaches are driven by budget silos and misaligned timeframes, which in turn is driven by siloed ministerial portfolios that fail to deliver on cross-departmental approaches.

### 3.2.1 Funding cycles

There is a misalignment between funding cycles across organisations. For example, DCWW and Network Rail's budgets work on 5-25-year cycles whilst public sector funding cycles typically work on 1-5-year cycles. The length of current funding cycles also poses challenges. Funding needs to be available for the entirety of the project lifecycle and should offer procurement flexibility. Uncertainty of future funding due to annual budgets creates challenges to long-term planning, limiting opportunities for effective collaboration (Foster, Ison, Blackmore, & Collins, 2018). The concept of adaptive management requires more flexibility in thinking and funding than current annualised systems and cycles allow. This annualised process is driven by annual budgets, which is a significant blocker.

### 3.2.2 Financial resources

A lack of financial resourcing has been identified as a barrier to partnership working in Wales. This is primarily a revenue funding issue. The amount of funding available for coastal partnerships has significantly reduced since 2000 in both England and Wales; resulting in some local partnerships suspending or small-scale local partnerships adapting to cover a larger area.

### 3.2.3 Access to funding

Available funding can be difficult to access, and stakeholders highlighted funding opportunities are not always well communicated. Limited access to funding can cause some organisations to work outside their area of expertise which may lead to conflict between partner organisations. Stakeholders have also experienced collaboration being inhibited by the level of competition for funding. Difficulties are also associated with consistency in funds across county and country borders.

Money to deliver FCERM currently being directly passed to Local Authorities instead of to partnerships was a concern for stakeholders. Furthermore, rigid processes often prevent organisations in receipt of Welsh Government funding (such as LLFAs or NRW) from passing funding onto third-sector organisations. This limits third-sector organisations' involvement across a catchment. Some stakeholders found the bidding process for funding to not be conducive to long-term thinking. At present, it is perceived by stakeholders that partnership working in Wales is a complicated procurement exercise as opposed to being a truly collaborative approach to delivering positive outcomes. In some cases where partnerships have been set up, the balance of power has been with one organisation (for

example, NRW or the National Trust) because they have the financial backing to be able to be a 'permanent' partner compared to others who can be 'disposed of' at the end of funding cycles and are required to bid again to continue their role in the partnership.

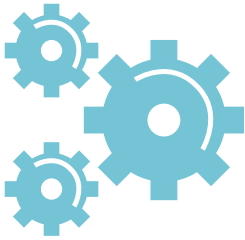
### 3.2.4 Funding criteria and objectives

The processes to acquire funding can hamper working collaboratively. Currently, partnership funding opportunities only make up 10% of scoring criteria for business cases on account of there being no formal mechanisms to lever partnership funding, nor any definition of what technically constitutes partnership funding. FCERM funding is targeted at a defence-based approach which protects people and property. Stakeholders would like funding for underpinning activities that support the development of community partnerships to deliver adaptation and resilience. Stakeholders found it more difficult to get funding for strategic approaches that have broader objectives beyond one focus.

Moreover, stakeholders identified there is no specific funding available for coastal adaptation. RMAs are required to bid for Welsh Government's FCERM funding pot, which is not set up with the right criteria to make coastal adaptation schemes easily fundable. In the past where opportunities might be identified for adaptation measures, where possible they have been delivered via the National Habitat Creation Programme (NHCP). However, this precludes partnership working as the NHCP is delivered by NRW.

There is an over-reliance upon FCERM funding pots to fund solutions and strategies that go beyond protecting properties and deliver protection or resilience to other assets e.g. transport or waste infrastructure. Conflicting priorities mean there is a reluctance for other departments to contribute to anything viewed as being predominantly an FCERM scheme.

### 3.3 Resources



Resourcing is a key issue associated with collaborative working in Wales and affects many organisations from local authorities to Welsh Government itself. Interviewees were quoted saying “If we don’t have the resources then we can’t improve, everybody’s just got their head down and doing day-to-day without much time for forward planning”; however, alternative methods of community engagement require additional resources in the form of training from specialist engagement practitioners.

The resource-deprived system becomes heavily reliant on individuals' 'goodwill' and, therefore is not conducive to effective collaborative working nor sustainable.

#### 3.3.1 Resource efficiencies

Partnership working has the potential to generate resource efficiencies, but it is hard to demonstrate this, making partnership working hard to justify. There are multiple evidence gaps which prevent the quantification of the benefits of catchment-scale working, including the more intangible well-being benefits.

A report into FCERM governance<sup>1</sup> in England and Wales found that three to five years of evidence and effectiveness monitoring is required to build confidence in catchment-based approaches. A high level of resources is often required at the start of partnership working to build relationships, agree on work plans, and develop MoUs. The present constraint on resources in FCERM in Wales makes this initial investment in time and money challenging and, in some cases, a 'non-starter', unless pushed through by goodwill.

#### 3.3.2 Continuity of staff

Staff retention towards the end of projects can be challenging and high turnover of personnel working on projects impacts overall relationships and levels of trust among partners. Continuity is needed to help build relationships and retain skills and knowledge. This is driven by short-term funding cycles (see section 3.2.1) and associated fixed-term contracts that if poorly managed at the end of a project due to instability and short-term thinking, can lead to highly valuable staff and their knowledge being lost as they seek more stable employment.

#### 3.3.3 Partnership working skills

There is a lack of the core skills needed in partnership building and management in the water and engineering fields such as community engagement and communication. See also 2.3.4.

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<sup>1</sup> <https://www.gov.uk/flood-and-coastal-erosion-risk-management-research-reports/understanding-effective-flood-and-coastal-erosion-risk-governance-in-england-and-wales>

### 3.4 Roles, responsibilities, and leadership



The complexity and confusion around roles and responsibilities in FCERM have been consistently raised in England and Wales (Alexander et al., 2021).

#### 3.4.1 Lack of obvious leader for catchment approaches

A point reiterated by numerous stakeholders is that there is no clarity on who should be taking the lead on catchment partnership working. This is consistent throughout the inland catchments and along the coast. On the coast, there is no clear organisation that is or should be, leading on adaptation. This is because it requires a cross-discipline approach versus being the sole responsibility of one organisation. Further difficulties may arise from non-statutory bodies taking on responsibilities associated with politically sensitive issues which are resource-intensive with no overall national programme support<sup>2</sup>.

#### 3.4.2 Disconnect between strategy and individuals on the ground

There is a disconnect between central planning/strategy and individuals on the ground who would form partnerships, alongside the wider disconnect between strategy and implementation of activities on the ground. Existing regional LLFA groups do exist but do not necessarily talk about projects, instead, discussions are focused on policy and strategy. In addition, there is a lack of using place-based knowledge to inform planning/strategy and as a result, they can be culturally insensitive; this leads to a lack of trust in government and NRW, with perceptions of the Government being unsympathetic to rural issues undermining trust/faith in policy. Disagreements between key stakeholders, in particular government and farming groups, prevent meaningful progress on developing and implementing partnership working.

#### 3.4.3 Focus and pressure to deal with the 'here and now'

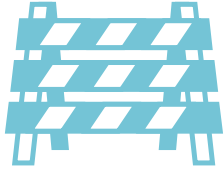
NRW and LLFAs are required to focus on managing the large-scale risks posed by flooding and delivering significant FCERM schemes. There is so much 'here and now' to deal with (massive asset base to maintain, flood warning systems, responses to increasing storm events), that this prevents bigger, strategic work. In addition, there is no link between those who lead on strategy and those who are implementing the strategy. Often, they will not necessarily find opportunities for nature-based solutions which could lead to/require partnership working. Another organisation therefore needs to step forward to take the lead on identifying opportunities for smaller-scale opportunities such as nature-based solutions (NBS).

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[https://www.researchgate.net/publication/228357620\\_Improving\\_governance\\_through\\_local\\_Coastal\\_Partnerships\\_in\\_the\\_UK](https://www.researchgate.net/publication/228357620_Improving_governance_through_local_Coastal_Partnerships_in_the_UK)

### 3.5 Process and administration



The process of organisations entering a partnership with NRW was perceived by stakeholders as significant, requiring memorandums of understanding and high levels of commitment from both parties. The primary mechanism for catchment partnerships being via procurement is also criticised, with stakeholders perceiving that it does not send the right message.

#### 3.5.1 Proliferation of new structures, plans, and collaborative arrangements

Stakeholders reported complexity and confusion around partnership structures in Wales, including administration challenges arising from responsibilities being confined by political boundaries, and organisational restrictions preventing collaborative working. There is also criticism toward the Welsh Government for their set up arrangements of partnership working and collaboration without first reviewing which existing structures could be repurposed. For example, Corporate Joint Committees (CJCs) are responsible for strategic development planning, regional transport planning and the economic well-being of their area and have been given new duties to drive greater collaboration. They are responsible for strategic development plans (SDPs) which will consider issues such as housing and transport. This is on top of local authority's local development plans (LDPs) and Public Service Boards' local well-being plans. The proliferation of these structures and plans poses a risk to cohesive, strategic flood risk management if flooding is not properly integrated and considered in their development. To do this, however, would require significant resources and planning for which there is currently little capacity.

### 3.6 Summary

Table 3-1 summarises the blockers and issues identified with current approaches to delivering strategic and spatial responses. It also highlights where common issues have been identified by this workstream and workstream 3 which is focused on the issues with the resourcing of flood risk management in Wales.

Table 3-1 - Summary of issues identified and overlap with those identified in Workstream 3

Theme	Issues	Workstream 3
Legislation, policy, strategy & plans	• Lack of alignment between FCERM plans	✓
	• Existing spatial plans are too broad	
	• Perceived absence of long-term direction for adaptation and resilience	✓
Funding	• Funding cycles	✓
	• Financial resources	✓
	• Access to funding	✓
	• Funding criteria and objectives	✓

Theme	Issues	Workstream 3
Resources	<ul style="list-style-type: none"> <li>• Resource efficiencies</li> </ul>	
	<ul style="list-style-type: none"> <li>• Continuity of staff</li> </ul>	
	<ul style="list-style-type: none"> <li>• Partnership working skills</li> </ul>	✓
	<ul style="list-style-type: none"> <li>• Resource efficiencies</li> </ul>	
Roles, responsibilities & leadership	<ul style="list-style-type: none"> <li>• Lack of obvious leader for catchment approaches</li> </ul>	
	<ul style="list-style-type: none"> <li>• Disconnect between strategy and individuals on the ground</li> </ul>	
	<ul style="list-style-type: none"> <li>• Focus and pressure to deal with the 'here and now'</li> </ul>	
Process and administration	<ul style="list-style-type: none"> <li>• Proliferation of new structures and collaborative arrangements</li> </ul>	



## 4 Partnership approaches in Wales

There are existing examples across Wales of organisations and communities coming together to deliver catchment-level approaches to water quality, flood risk management and biodiversity improvement. It is important to highlight that the two examples presented below from the Environment Sector were not set up to focus on flood risk management, and instead focus on water quality and biodiversity. That said, it can be argued that the measures and work delivered provide multiple benefits, including flood risk management.

### 4.1 Environment sector - Uwch Conwy Catchment Partnership



Figure 4-1 - The river at Cwm Penmachno | © National Trust Images/Paul Harris  
The river at Cwm Penmachno | © National Trust Images/Paul Harris

#### 4.1.1 Overview

The Uwch Conwy Catchment Partnership covers an area of 336 km<sup>2</sup> and aims to connect vital habitats and rivers, to reduce the effects of climate change and provide benefits for nature, wildlife, and people. The site includes multiple designated areas and a range of habitats requiring restoration. Restoring these habitats is designed to improve the local environment's resilience to extreme weather. Work delivered by the partnership includes:

- Reconnecting rivers to floodplains
- Peatland drain blocking
- Catchment woodland
- Removal of man-made constraints
- Reprofile riverbanks

The project developed from the first ditch-blocking trial in 2007 which used heather bales. The project evolved with Leeds University to use peat and reprofile drains in 2009.

Measures used in the project are selected based on evidence, investigating where pressures have been observed in the catchment and how best to target these.

#### 4.1.2 Partners

- National Trust Cymru - lead partner
- Natural Resources Wales - lead partner
- RSPB Cymru
- Eryri National Park
- Rivers Trusts
- Farmers and landowners

#### 4.1.3 Partnership approach

The working approach places a strong emphasis on collaboration, which has been reflected in time and resources being invested in the partner organisations working together to identify opportunities, challenges, and benefits to improving nature. The partnership benefits from partner organisations who have aligned visions: the National Trust's Land Outdoor and Nature Strategy and Welsh Government's Well-being of Future Generations Act have several shared goals which have enabled buy-in and support for the partnership's work at the most senior levels of each organisation. It has also created a shared framework from which to deliver multiple benefits from their activities and measure their success. This has been complemented by a bottom-up approach, demonstrated by the time and effort taken over 8 years to carefully build trust with and learn from the local farming community.

Multiple funding schemes have been used, including:

- Nature and Climate Emergency Fund (Welsh Government)
- Nature Networks 2 Fund (Welsh Government)
- The National Peatland Action Programme (NRW)
- Water Capital (Business Wales - Welsh Government)
- Sustainable Management of Natural Resources (Rural Development Programme - Welsh Government)
- Land Outdoor and Nature Programme (National Trust)
- Ecosystem Resilience Fund (Welsh Government)

The large partner organisations have filled any funding gaps when required. This highlights the difficulty to set up and deliver partnership working without 'start-up' or 'seed' funding initially, and long-term funding to allow relationships to continue to be built and work programmes identified, planned, and delivered.

Flood risk management funds have generally not been used to fund the project, although many of the benefits from the work have flood risk benefits. This was on account of measuring the delivery of water quality and wider environmental benefits to be far clearer and easier compared to trying to estimate the level of flood protection delivered by nature-based solutions, as required by many flood risk funds.



#### 4.1.4 Enablers

Theme	Example
Collaborative & integrated approaches	<ul style="list-style-type: none"> <li>• Senior-level organisational buy-in &amp; shared strategic goals.</li> <li>• Continuity of staff – 8 years of the same people, providing familiarity to local stakeholders.</li> <li>• Staff co-locating and working together in the same workspace.</li> <li>• National Trust and NRW are connected in landownership. For example, National Trust Farms connect with Welsh Government Woodland Estate opportunities to work on a landscape scale.</li> <li>• Evidence-driven, place-based approach that has identified a long list of schemes to work through as funding arises.</li> <li>• Maintained focus on mutual aims.</li> </ul>
Community engagement	<ul style="list-style-type: none"> <li>• Taking time to build relationships, trust and buy-in from local farmers and communities, e.g. through regular, collaborative drop-in sessions.</li> <li>• Demonstration sites for different land management techniques and sharing learnings with others. This has led to work happening on private land and beyond boundaries, enabling more joined-up landscape-scale change.</li> </ul>
Funding & resources	<ul style="list-style-type: none"> <li>• Ability to draw on resources &amp; expertise of NRW &amp; National Trust.</li> <li>• Larger organisations can bridge gaps between funding streams to allow staff to continue work.</li> </ul>

It should be noted that replicating the success of this case study elsewhere in Wales may not necessarily be possible on account of the land ownership and control which has been critical to its success. It highlights, however, that where there are similar land ownership setups elsewhere in Wales, these should be prioritised for the development of catchment partnerships.

#### 4.1.5 Challenges

The partnership has occasionally been challenged by some resistance against land management practices that ultimately reduce agricultural productivity. The other challenges have been solely related to funding, namely the multiple, short-term funding pots which leave a small window for projects to be delivered on the ground and require re-application each year, preventing the partnership from effectively planning and delivering a pipeline of work in the long-term. Each funding stream has its own set of rules and requirements for the partnership to navigate and meet, taking up additional time and resources.

## 4.2 Environment Sector - Severn Estuary Partnership

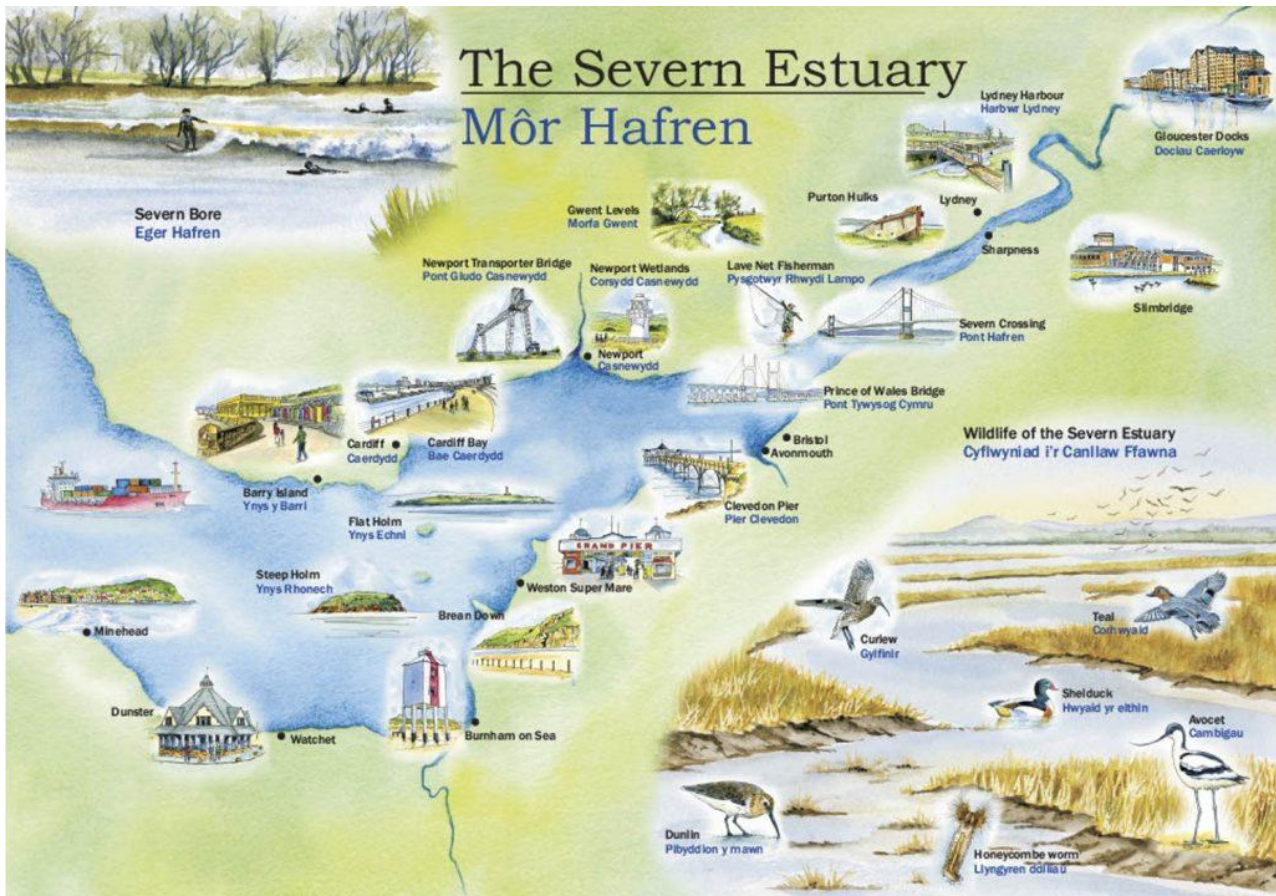


Figure 4-2 - The area covered by the Severn Estuary Partnership | © Severn Estuary Partnership

#### 4.2.1 Overview

The Severn Estuary is the UK's largest coastal plain estuary. It has over 110 fish species, a winter-feeding ground for 100,000 birds, is nature-protected in designated areas, and has the largest tidal range in Europe, all surrounded by iconic landscapes.

The Severn Estuary Partnership (SEP) is an independent initiative that is hosted by Cardiff University. It was set up in 1995 to work with local stakeholders in promoting a sustainable approach to the planning, management, and development of the Severn Estuary for all who live and work around the estuary. The partnership's aims include:

- Establishing and embedding a set of 'common principles' for sustainable estuary use via Partners' strategies, policies and action plans
- Acting as a co-ordination body to assist the effective and efficient delivery of agreed estuary-wide actions
- Adding value and filling gaps in effective estuary management, providing extra capacity when required
- Facilitating effective communication across and between organisations, individuals and borders
- Promoting and publicising the estuary at local, national and international levels

- Identifying and delivering project work that contributes to the evidence base for decision-making and supports those who have an interest in the Severn Estuary

#### 4.2.2 Partners

- Cardiff University - support
- Bristol City Council
- Cardiff County Council
- Forest of Dean District Council
- Gloucestershire County Council
- Newport City Council
- North Somerset Council
- Somerset Council
- Monmouthshire County Council
- Environment Agency South West
- Natural Resources Wales
- Natural England

#### 4.2.3 Partnership approach

The SEP is an independent, non-statutory organisation which relies on the support and active participation of its members as well as a range of individuals and other organisations. The partnership approach was first outlined in the first Seven Estuary Strategy, published in 2001. This set out a practical framework for collaborative working.

The SEP has evolved, bringing the relevant groups, organisations, and local authorities into the discussions for the Severn Estuary. There is one team working collectively on issues, factoring in the priorities of different groups and collaborating on project development for stakeholder engagement. The SEP acts as an umbrella for estuary-wide partnerships working across both sides of the border.

The SEP's neutral status means they can facilitate the necessary discussions, on topics including marine planning and biosecurity. There is a small team behind the partnership which meets weekly which ensures everyone is aware of what is happening across the estuary and the partnership. This means that everyone is automatically linked into estuary-wide discussions.

#### 4.2.4 Enablers

Theme	Example
Collaborative & integrated approaches	<ul style="list-style-type: none"> <li>• Hosted by Cardiff University allows for different communication streams to be integrated and for knowledge sharing across the partnership and beyond.</li> <li>• Acting as an umbrella organisation which brings together organisations in both England and Wales.</li> </ul>

Theme	Example
	<ul style="list-style-type: none"> <li>• Neutral status allows the SEP to facilitate the necessary discussions with England and Wales.</li> <li>• Organisations having close relationships with SEP helps with policy development.</li> <li>• Facilitating in-person events to bring groups together.</li> <li>• Holding lunchtime learning sessions looking at the big picture and sharing knowledge widely across the partnership.</li> <li>• Regular meetings mean opportunities for designing multiple benefits into all projects can be identified and delivered.</li> </ul>
Funding & resources	<ul style="list-style-type: none"> <li>• Association of Severn Estuary Relevant Authorities (ASERA), the Environment Agency and WLGA fund officer roles.</li> <li>• Good relationships with the core funders and local authorities.</li> </ul>

#### 4.2.5 Challenges

- Partnership working in the organisations in the SEP is being done on top of day jobs.
- The coast was not included in the initial Catchment Based Approach (CaBA) catchments. It has been difficult retrofitting the coast into catchment partnerships.
- Lack of capacity means there are not enough people to do everything.
- ASERA, the Environment Agency and WLGA fund officer roles which means a proportion of the officer's time is spent on work specific to the organisation.
- Reliant on project funding.
- Funding timeframes are strict and not very long-term. This negatively impacts partner relationships, as there is a lot of pressure on the stakeholders to engage, but the connections are dependent on funding.
- Different, and sometimes conflicting, policies in England and Wales. Even the slight difference in wording results in a different approach being taken.
- Inefficiencies in silo working and government working results in lots of missed opportunities for collaborative working, specifically around community engagement.
- Everyone involved in the SEP is focused on different tasks which makes it hard to be adaptive and instead respond to needs as they arise.

### 4.3 Health Sector - Welsh NHS Confederation Wales and Arts Council of Wales

#### 4.3.1 Overview

The Welsh NHS Confederation (WNHSC) and Arts Council of Wales (ACW) have been working in a pioneering partnership for 6 years to improve awareness of the benefits the arts can bring to health and wellbeing and create a more equal, cultural and sustainable



Wales. In its global study on arts and health<sup>3</sup>, Lancet Public Health stated that the partnership "is one of the most concrete commitments we found, both in terms of the intersectoral approach and the specific investment and action". The activities delivered by the partnership include:

- Sharing best practice;
- Art and health teams;
- Training and networking;
- Backing innovation; and
- Raising awareness.

These activities have been supported by an arts and health coordinator being placed in each health board who can understand challenges, align strategic priorities, and provide effective support for individuals, staff and the overall system. Working together, they form a national network that can address key priorities and an infrastructure to support the creative health ecosystem.

#### 4.3.2 Partners

- Welsh NHS Confederation
- Arts Council of Wales
- Health Boards

#### 4.3.3 Partnership approach

In 2017, a [Memorandum of Understanding](#) (MoU) was formed between the WHNSC and ACW. It outlines the key activities that the two organisations are committed to contributing to. This MoU has been re-signed each year and supported by a detailed work programme.

#### 4.3.4 Enablers

- The programme has benefited from ministerial-level commitment.
- Legislation such as the Wellbeing for Future Generations Act (2015), which requires public bodies to work towards long-term wellbeing targets, has opened opportunities for arts and health providers to think differently and work together.
- The Act provides a framework for partnership working between cultural and health sectors, with an obligation to improve social, cultural, environmental, and economic wellbeing.
- Continuity of staff: the key individuals from each organisation leading the work programme have been in post since the inception of the partnership.

#### 4.3.5 Challenges

Challenges in the context of this partnership pertain primarily to the arts and health coordinators' roles within health boards as opposed to the partnership between WHNSC

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<sup>3</sup> [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(22\)00313-9/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(22)00313-9/fulltext)

and ACW. An evaluation of the Arts and Health Coordinator Capacity Building Programme is available [here](#).

#### 4.4 Commonalities

Across the above three case studies, the following themes are common strengths and enablers of their success. These should be considered as key to the setup of future catchment partnerships in Wales:

Theme	Commonality	Explanation
Collaborative & integrated approaches	Shared organisational goals	<i>Partnerships between organisations with shared visions make the process of developing a partnership's goals and/or vision easier and can better enable senior-level buy-in.</i>
	Strategic, senior-level organisational buy-in	<i>Buy-in at the higher levels of partnership organisations can reduce barriers to accessing funding and resources for example allowing for staff to be working full time for partnerships.</i>
	Agreed work programme	<i>Spending time to develop an agreed programme of work and projects provides a framework/blueprint that can be used to inform bids for funding pots as they arise, allowing for strategic delivery as opposed to ad-hoc delivery based on what funding becomes available.</i>
Funding & resources	Continuity of staff	<i>Staff remaining in post for the long term allows for relationships and trust to be built and maintained between partner organisations and stakeholders. It protects the tacit knowledge which is often vital to partnerships, be it understanding particular individuals or awareness of local environmental systems.</i>
	Long-term financial support from larger organisations	<i>Long-term funding allows for continuity of staff and the ability of the partnership to deliver an agreed programme as opposed to short-term funding pots which can lead to rushed, ad-hoc project delivery and low staff retention.</i>
Legislation	Well-being of Future Generations Act	<i>The Act provides a framework and driver for cross-sectoral/organisational collaboration.</i>

#### 4.5 England - the Catchment Based Approach

### **Catchment Based Approach (CaBA)<sup>4</sup>**

In 2013, the UK Government published the Catchment Based Approach (CaBA) policy framework. It was developed following a review of the river basin planning strategy in the context of the European Water Framework Directive, focusing on institutional arrangements and processes, alongside key pilot studies. Key feedback from the pilot studies included the usefulness of having some formal recognition of the partnerships' status for bringing individuals and organisations together to work towards a common goal.

CaBA established catchment partnerships across all English river catchments to improve water quality and work collaboratively with stakeholders. The framework provides a range of ideas and suggestions to encourage collaborative working across the catchment, rather than being a prescriptive method for setting up local initiatives. Funding was allocated to each catchment to support the establishment of the partnership, and the Environment Agency was able to step in should there not be a 'local offer to work at the catchment scale' to ensure all partnerships were implemented. The Environment Agency provided the link between river basin planning and the catchment-based approach, to allow for efficient working across different objectives and scales.

The key principles of CaBA are:

- There is an environmentally focused planning and management process covering every catchment in England.
- There is an opportunity for local engagement for every waterbody, irrespective of whether catchment partnerships exist.
- Formal catchment partnerships will be recognised by the Environment Agency. Leads in partnerships will be agreed upon with stakeholders in the catchment according to their ability to tackle the issues in the catchment collaboratively.
- Catchment partnerships look at the water environment in terms of all the ecosystem services connected to a healthy catchment and aim for better integration of planning and activities to deliver multiple benefits (for example, supporting the delivery of objectives for the Water Framework Directive, Biodiversity 2020 and flood risk management).
- Catchment partnerships inform the river basin district planning process and become integral to the way that Water Framework Directive objectives are delivered providing a degree of flexibility to respond to emerging local evidence.
- Other groups in and across catchments continue to operate, particularly at a more local community scale or around a specific issue. They seek any formal recognition of their activities in River Basin Management Plans through the catchment partnership (where they exist) or the local Environment Agency catchment contact (where no partnership exists).

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4 <https://assets.publishing.service.gov.uk/media/5a75c5ece5274a4368299d92/pb13934-water-environment-catchment-based-approach.pdf>

CaBA brings together knowledge and expertise to deliver multiple benefits, from improving water quality and biodiversity to helping the development of sustainable businesses, alongside health and well-being. Local communities are encouraged to engage with and take ownership of their local river environment. Partnerships within CaBA have been, on average, able to secure eight times more investment compared to the initial value, cost-effectively using these funds. The collaborative way of working allows conflicting viewpoints to be overcome without the need for legal intervention.

Originally estimated at around 80 potential partnerships, there are currently 107 partnerships listed on the Environment Agency website. The 2013 Defra report highlighted that despite the drawn boundaries, catchment partnerships will need to work across these boundaries, and even borders. Five partnerships cross into Wales:

1. [Tidal Dee Catchment Partnership](#)
2. [Middle Dee Catchment Partnership](#)
3. [Severn Uplands Partnership](#)
4. [Teme Catchment Partnership](#)
5. [Wye Catchment Partnership](#)

The Tidal Dee Catchment Partnership is in the north of Wales, along the border of England and is managed by the Cheshire Wildlife Trust. Natural Resources Wales, in line with the EA's aims for CaBA, 'place value on collaborative decision making and local action to help deliver improvements to water bodies across the Dee catchment'. The partnership was set up following a successful bid in 2013 by the Welsh Dee Trust and Cheshire Wildlife Trust for EA funding. Following this, the partnership adopted a cross-border approach to enable collaborative working and target funding from Wales for future work and is supported by a steering group. Since the establishment of the partnership in 2013, there have been numerous achievements, including being granted funding by the National Lottery Heritage Fund in 2018, due to the unique cross-border collaboration within the partnership. This has enabled projects such as 'Our Dee Estuary / Caru Aber Dyfrdwy' to start up. From 2022 to 2025, the project activities will 'include promoting the estuary and encouraging behaviour change, estuary wildlife focussed volunteering, training and learning and establishing a long-term and unified approach to estuary management'. Despite being primarily located in Wales; this partnership was successfully set up under CaBA and is making significant progress towards the CaBA objectives.



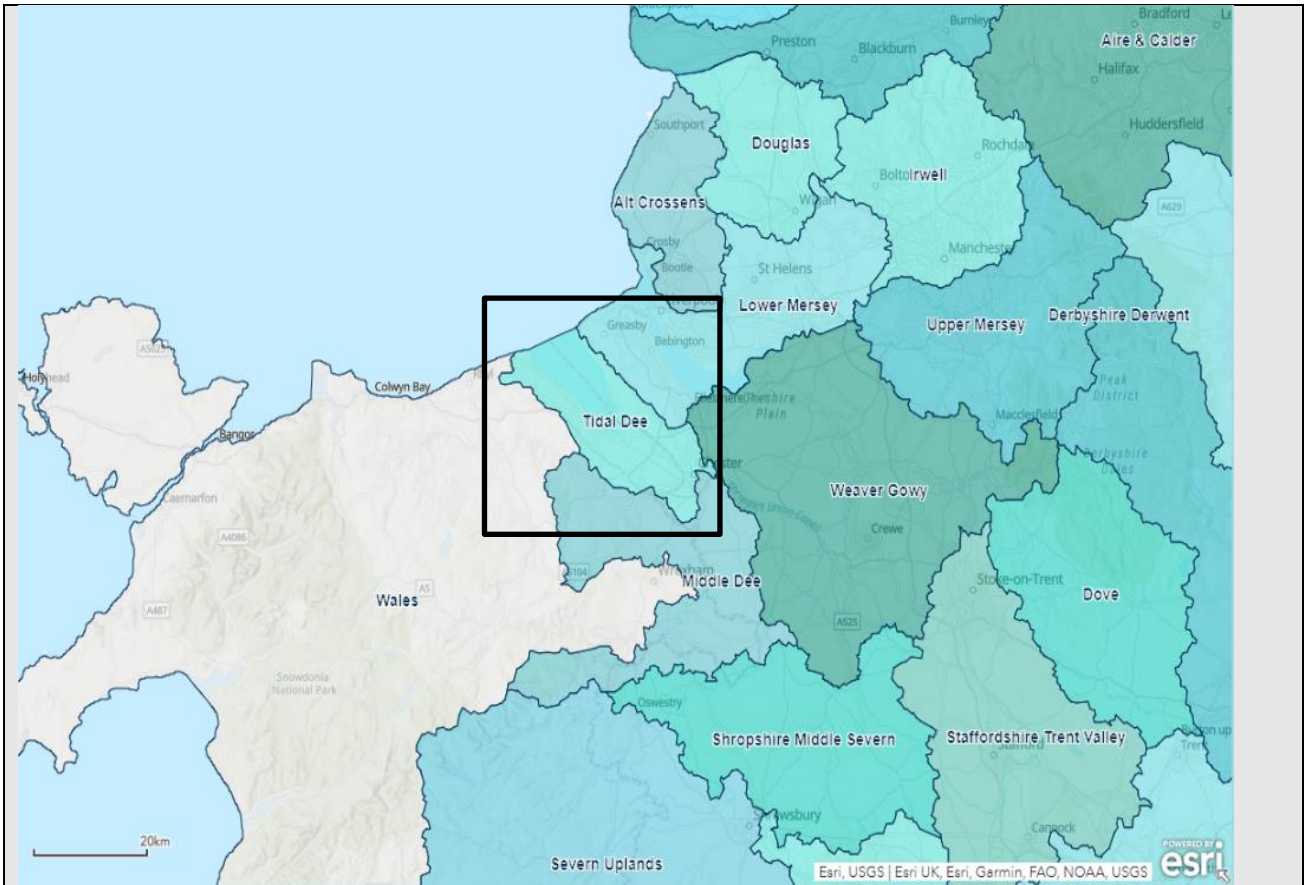
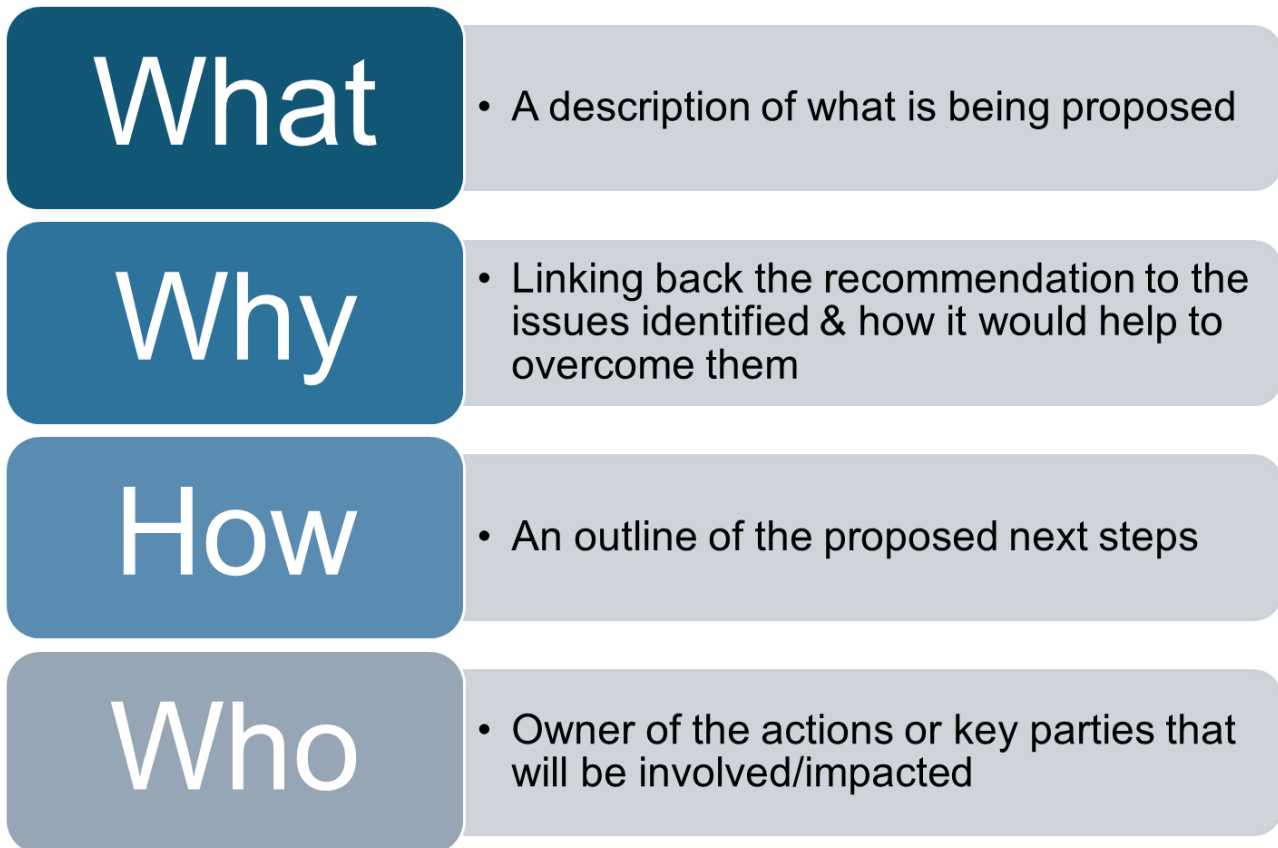


Figure 4-3 - Location of the Tidal Dee catchment in the north of Wales

## 5 Recommendations

### 5.1 Introduction

This section outlines the recommendations using the following structure:



#### 5.1.1 Radical approaches

The Commissioners have challenged the JBA team to approach this research freely and radically. They have actively encouraged the team and stakeholders to unchain themselves from current frameworks and practices, thinking as widely as possible. To this end, the recommendations in this report consider what strategic and spatial approaches to flooding would be suggested if we were to "start again". The recommendations are therefore not necessarily all solutions that could be actioned in the short term, they outline alternative approaches to current structures that could require significant changes. The report outlines the existing situation, identifies current issues and barriers, and then provides recommendations for a way forward.

#### 5.1.2 Changes to legislation

Where a proposed approach would require or benefit from a change to legislation, this has been identified in the relevant recommendations. The FWMA 2010 is the primary piece of legislation that has proposed changes identified. The recent repeal of EU legislation, such

as the Flood Risk Regulations 2009 (transposed from EU Directive 2007/60/EC) which outlines NRW's flood risk statutory duties (e.g. duty to prepare preliminary flood risk assessments, flood hazard and risk maps, and flood risk management strategies), presents a valuable and timely opportunity to make changes to legislation in relation to flood risk responsibilities. Crucially, any consultation period relating to the proposed transposition of this revoked legislation into the FWMA 2010 should consider the recommendations from this report relating to the streamlining of responsibilities and plans.

Table 5-1 - Summary of recommendations proposing legislative amendments

Recommendation	Proposed amendments to legislation to FWMA 2010
R1: Develop a National Flood & Coastal Erosion Resilience Strategy	<ul style="list-style-type: none"> <li>• Recognise change to the name of strategy from 'risk management' to 'resilience'.</li> <li>• Require strategy to address measures and objectives to deliver climate change adaptation.</li> </ul>
R2: Streamline FCERM plans into Catchment Resilience Strategies	<ul style="list-style-type: none"> <li>• Replace local flood risk management strategies with catchment resilience strategies.</li> <li>• Do not transpose the Flood Risk Regulations 2009 requirement for NRW to deliver separate flood risk management plans.</li> </ul>
R4: Establish a Ministry of Climate Change	<ul style="list-style-type: none"> <li>• Recognise the Ministry of Climate Change as the responsible authority for delivering the National Flood &amp; Coastal Erosion Resilience Strategy.</li> </ul>
R8: Strengthen the role of existing regional flood groups and coastal groups	<ul style="list-style-type: none"> <li>• Recognise the role of regional flood and coastal groups as statutory authorities (similar to RFCCs in England)</li> </ul>

### 5.1.3 Overview of recommendations

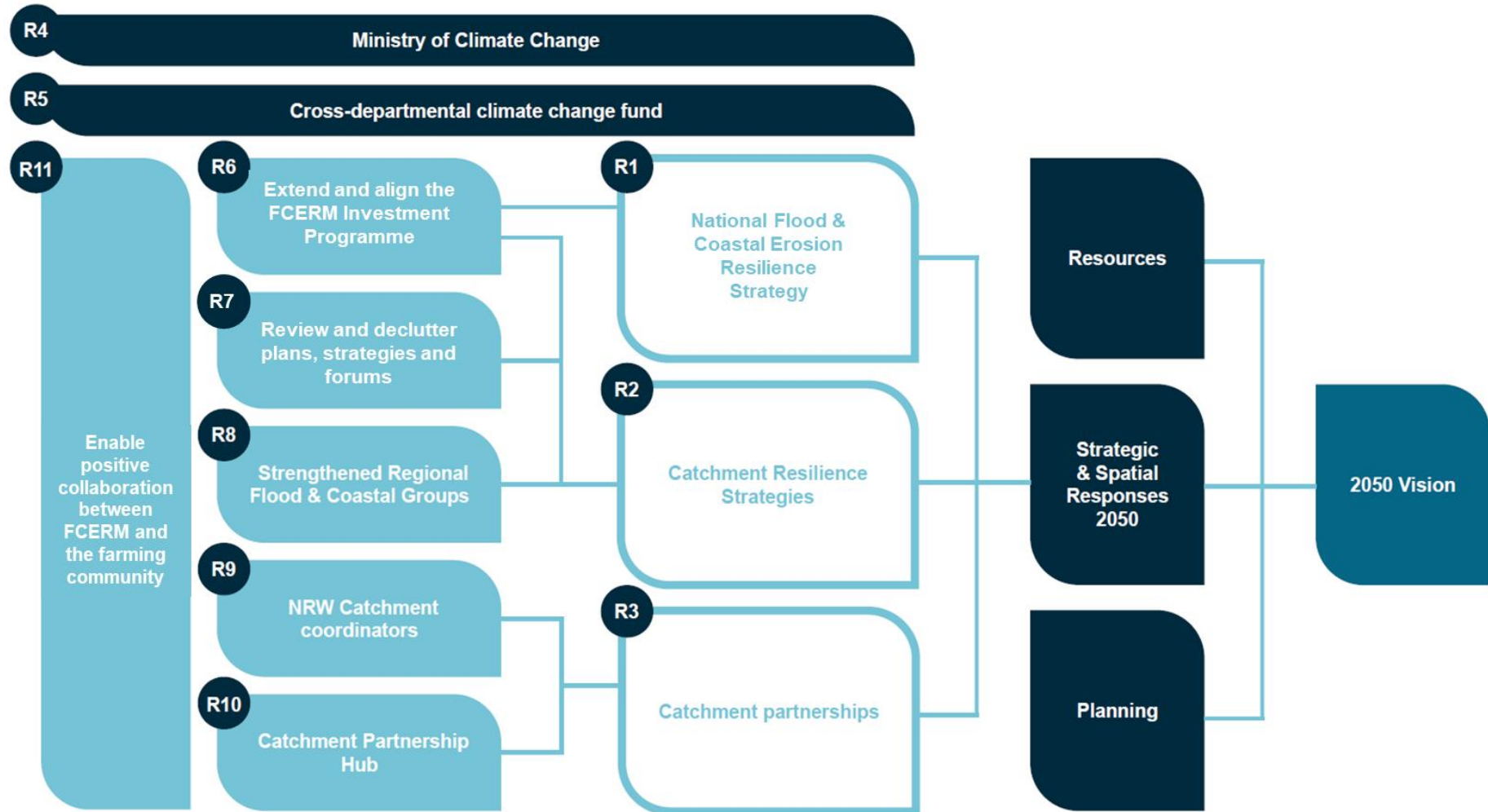


Figure 5-1 Structure of recommendations for Strategic & Spatial Responses to flooding

#### 5.1.4 Alignment with Workstream 3 recommendations

Table 5-3 summarises the recommendations to deliver better and more strategic and spatial approaches to flooding. It also highlights where there is overlap or links with recommendations made by workstream three, which is focused on the issues with the resourcing of flood risk management in Wales.

Table 5-2 - Summary of linked recommendations with Workstream 3

Recommendation	Relevant Workstream 3 recommendations
<p>R1: Develop a National Flood &amp; Coastal Erosion Resilience Strategy</p>	<p>Issue guidance to local authorities on the status of climate adaptation in relation to flooding and intentions to legislate.</p> <p>Underpin collaboration established in short-term section with legislation to ensure adequate prioritisation.</p> <p>Make Climate Change Adaptation a corporate priority - link directly to FCERM.</p> <p>Develop a national Adaptation policy, which includes resilience measures and framework.</p>
<p>R3: Set up a framework for catchment partnerships</p>	<p>Support the creation of community resilience groups.</p> <p>Provide funding to community resilience groups to invest in community flood management.</p>
<p>R4: Establish a Ministry of Climate Change</p>	<p>Issue guidance to local authorities on the status of climate adaptation in relation to flooding and intentions to legislate.</p> <p>Make Climate Change Adaptation a corporate priority - link directly to FCERM.</p> <p>Develop a national Adaptation policy, which includes resilience measures and framework.</p>
<p>R8: Strengthen the role of existing regional flood groups and coastal groups</p>	<p>Draw up terms of reference for three regional working groups to support deeper collaboration on project management, administration, and catchment working. NRW should be included in this to support project management at the national level.</p>
<p>R10: Fund and set up a national catchment partnership hub</p>	<p>Support NRW to develop a national approach to partnership funding including large public sector estates, large private sector estates and green finance initiatives</p>

## 5.2 R1: Develop a National Flood & Coastal Erosion Resilience Strategy

**What:** In recognition of many of the measures and objectives in the FCERM Strategy<sup>5</sup> (published in October 2020) being met, the timetable for producing a new strategy should be brought forward as an opportunity to reset and focus on how Wales can adapt and become more resilient to the increasing risks posed by flooding and coastal erosion. A small change in the language used from 'risk management' to 'resilience' could have a big impact on people's and organisations' approaches to FCERM. The term resilience encompasses both reducing the risk of flooding and coastal erosion and improving our capacity to adapt, respond and recover from risks that can never be completely removed.

The current Strategy acknowledges that Wales' *“risk management approach encourages wider resilience, prevention and awareness of risk so that better decisions can be made, both by the public and those with an influence on how land and water is managed”*. This should be reflected in a change to what FCERM refers to and mark a step change in Wales' commitment to resilience approaches. The new Strategy should endorse and align with NICW's Vision for Flood Resilience in Wales workstream. It should also align with and cascade from the new national Climate Adaptation strategy and the supporting plans due to be published in Autumn 2024. Resilience is an outcome of adaptation therefore a Flood and Coastal Erosion Resilience Strategy should clearly outline adaptation measures proposed to achieve resilience.

A change to the name of the strategy will need to be reflected in the Flood and Water Management Act 2020, Part 1, Section 8. The legislation should also be changed so that in addition to the current requirements laid out in Paragraph 2, the strategy must specify the objectives and measures for adaptation to climate change and improving resilience to flooding. This could be set out in a roadmap with medium-term goals to chart progress and link up the long-term aspirations in the strategy and the national Climate Adaptation Strategy with the FCERM challenges we face today.

### Why:

Issue	Proposed resolution
Perceived absence of long-term direction for adaptation and resilience	In this updated version, a long-term direction and vision should be set for adaptation and resilience to climate change, using the outputs of NICW's Vision for Flood Resilience in Wales workstream. A strategy with objectives and measures relating to the long-term will help RMAs move their focus beyond just dealing with present pressures
Focus and pressure to deal with the 'here and now'	

### How: Actions

- Welsh Government to make amendments to the FWMA 2010, reflecting the change to the name and content of the strategy.

<sup>5</sup> <https://www.gov.wales/sites/default/files/publications/2020-11/the-national-strategy-for-flood-and-coastal-erosion-risk-management-in-wales.pdf>

- Welsh Government Flood Branch to consult with WLGA, NRW, LLFAs, IDDAs and DCWW to explore options, impacts, and benefits of bringing forward the update.
- With a new strategy there should be a new alignment with DCWW and Network Rail's asset management period (AMP) implementation and planning cycles (see R6).

**Who: Key actors**

- Welsh Government to lead on the delivery of a new strategy and consult the relevant organisations as per the FWMA 2010.
- Going forward, specifically the Ministry of Climate Change (see R4) should be responsible for the strategy.



### 5.3 R2: Streamline FCERM plans into Catchment Resilience Strategies

**What:** Following the proposed update and delivery of a Flood and Coastal Erosion Resilience Strategy, NRW, LLFAs, DCWW, IDDAs and Local Planning Authorities should work in partnership to produce collaborative, strategic catchment-level plans, referred to as Catchment Resilience Strategies that address all sources of flood risk. It's proposed these would be at the Water Framework Directive Management Catchment Level. The size of these catchments in Wales is large enough scale to add strategic value but small enough to create a meaningful plan that will encourage and support local engagement and action. There are 19 Management Catchments in Wales which are mapped in Figure 5-2. These plans should align with the national Resilience strategy, setting out a plan to improve resilience to flooding over the long term (50-100 years), considering the impacts of climate change and other pressures within catchments. Some of the catchments cross the English/Welsh border, and therefore as per the FWMA 2010, co-operation with the Environment Agency and LLFAs in England would be required to ensure the whole catchment is considered.

The Catchment Resilience Strategies would replace local flood risk management strategies that the FWMA 2010 currently requires. A summary of how the catchment resilience strategies would differ from current local flood risk management strategies is summarised in Table 5-3. These changes will need to be reflected formally in a change to the FWMA 2010. This is crucial to the success of these strategies, as previous attempts have been thwarted by RMAs not having the capacity due to catchment-level plans being required in addition to their statutory responsibilities.

The existing process of Strategic Flood Consequences Assessments should be incorporated into the catchment resilience strategies from the outset to maximise compatibility and alignment with local plans. Shoreline Management Plans should remain separate documents, but the FWMA 2010 should require that SMPs and the Catchment Resilience Strategies are aligned and give due regard to one another in the sections addressing tidal flooding. This will be particularly crucial in catchments such as the Severn and the Rhymney, where there are significant tidal effects on rivers and estuaries. There could be an opportunity to absorb SMPs into the Catchment Resilience Strategies in the future, however, initially, they should be kept separate to avoid them becoming too unwieldy and therefore difficult to action.

RMAs should then each develop delivery programmes aligned with the catchment resilience strategies and in accordance with their statutory responsibilities. These will outline key schemes and initiatives that deliver on the resilience objectives set out in the catchment strategies. Progress should be monitored and reported through NRW's Section 18 reports, which are subject to review by the Flood and Coastal Erosion Committee. Catchment partnerships (R3), key landowners and the farming community should be key partners in the development of the overall strategies and the subsequent delivery programmes.

The proposed spatial and strategic scales of the plans how they could interact with one another, and other recommendations outlined in the report are depicted in Figure 5-3.



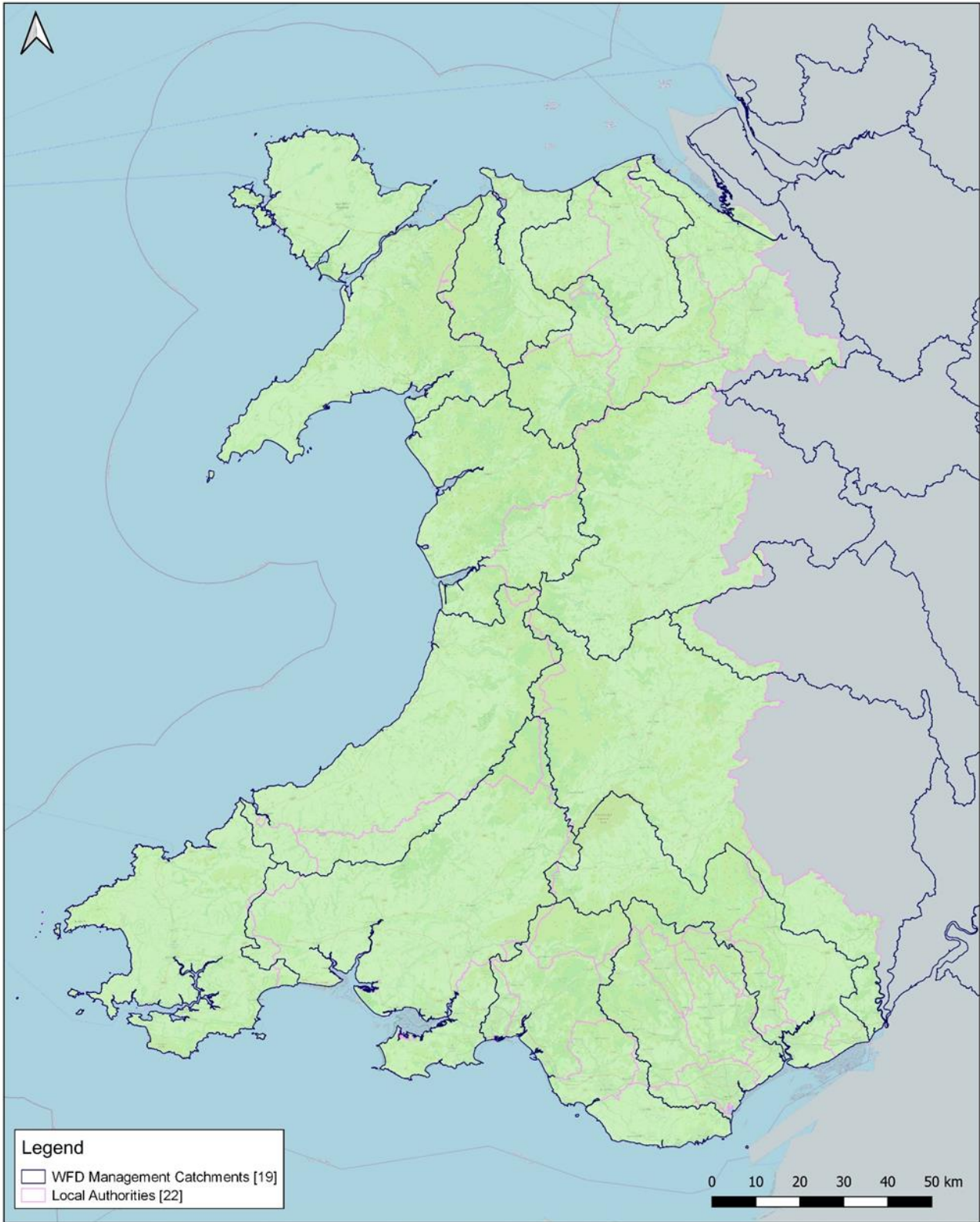


Figure 5-2 - WFD Management Catchment Boundaries compared to Local Authority Boundaries

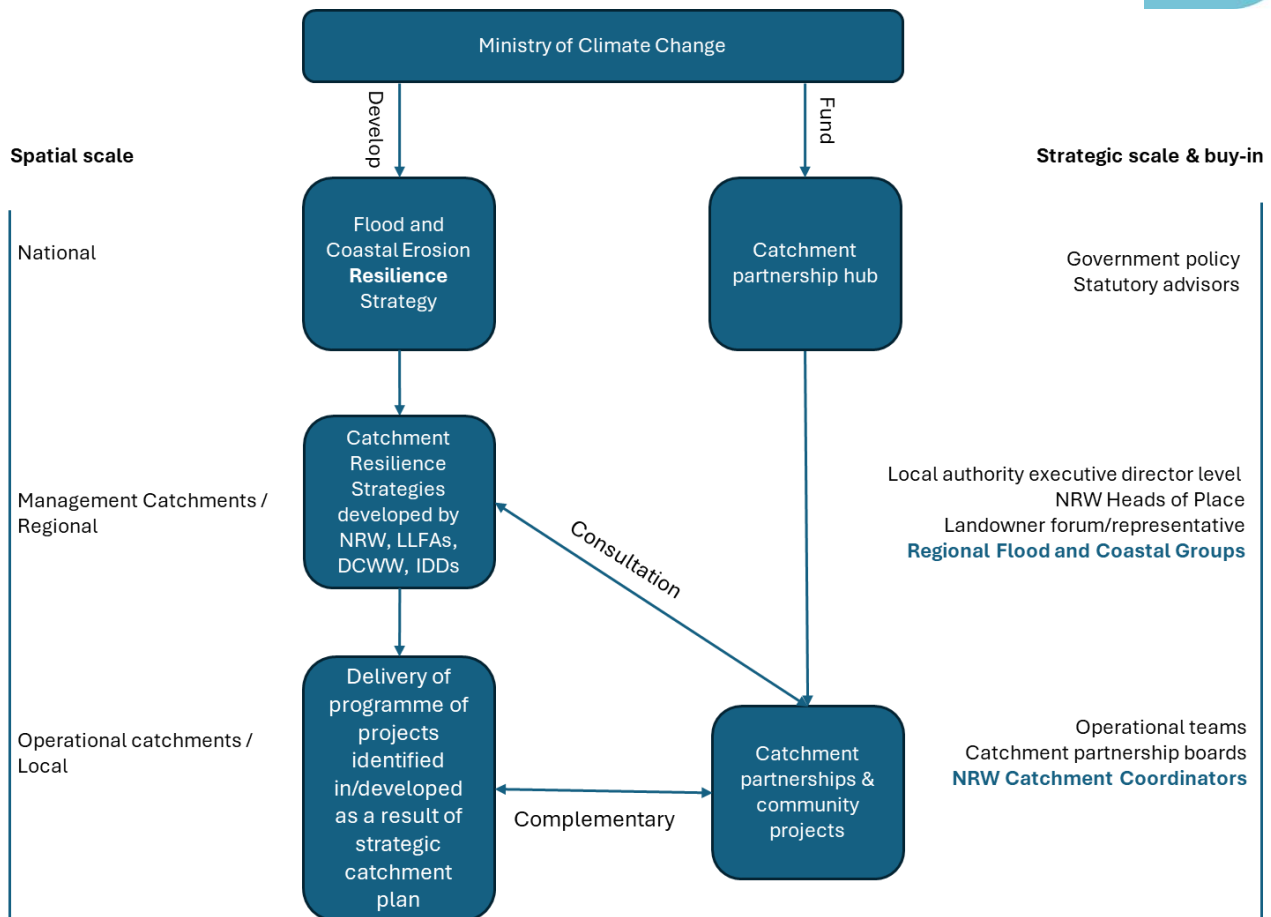


Figure 5-3 - Proposed strategic and spatial approach to FCERM planning

Table 5-3 - Comparison of existing flood risk management plans and proposed catchment resilience strategies

	Current		Proposed
Strategy	Local flood risk management strategies	NRW flood risk management plans	Catchment resilience strategies
Spatial scale	Local authority boundaries	National & NRW Areas	WFD Management Catchment
Flood sources	Surface runoff Groundwater Ordinary watercourses	Main river Tidal Reservoirs	Main river Tidal Reservoirs Surface runoff Groundwater Ordinary watercourses Sewers
Delivered by	Lead local flood authority	NRW	All RMAs IDDs

**Why:**

Issue	Proposed resolution
Lack of alignment between FCERM plans	A catchment resilience strategy will align flood RMA objectives into one cohesive, collaborative plan
Disconnect between strategy and individuals on the ground	In engaging with catchment partnerships, better links between strategic plans and individuals on the ground can be more formally recognised and planned.
Focus and pressure to deal with the 'here and now'	If the objectives and measures outlined in the FCERM strategy are focused on a long-term resilience vision and adaption measures, the plans should reflect this and encourage/allow programmes to look beyond only the here and now and identify solutions that can address current and future risks.
Resource efficiencies & Financial resources	<p>The removal of the ringfence around funds for flooding for local authorities presents a challenge to the future of FCERM. In allowing RMAs to pool their resources together to deliver collaborative plans, there are likely to be significant efficiencies from there being fewer plans.</p> <p>Catchment approaches allow RMAs to consider how the issue of flooding can be dealt with in the most suitable places in the catchment. For example, flooding in Monmouthshire could be alleviated through measures taken to hold back water in the uplands in Powys.</p>

**How: Actions**

- Welsh Government to make amendments to the FWMA 2010.
- To test the proposed approach of delivering catchment resilience strategies, a pilot should be undertaken in up to 3 catchments in Wales. This process would help identify enablers and barriers to the process, as well as emerging best practice approaches ahead of it being rolled out further.
- Engage with the Environment Agency and relevant LLFAs to discuss and agree on an approach to co-operation in the development of the strategies, as per FWMA 2010.
- LLFAs are still awaiting guidance to deliver their LFRMS, therefore there is a chance to start this process ahead of their development. Given that joint FRMPs were explored in the past, there is potential to bypass a pilot process and simply replace the existing flood risk management plans and strategies before LLFAs put effort into developing their updated LFRMS. If this were to be the case, then changes to the FWMA 2010 would need to be prioritised.

- Depending on the timing of the pilot and the recommended publication of a new National Flood and Coastal Resilience Strategy, Welsh Government should create a simple, mock version of the strategy (see R1). It should focus on outlining measures and targets that can be used for the catchment resilience strategies to align with and respond to, drawing on the outputs of NICW's Vision for Flood Resilience in Wales workstream.
- Appoint a team such as FCEC to review the success and challenges of the approach.

**Who: Key actors**

- Buy-in for and engagement with the catchment resilience strategies will be needed from actors such as those listed below. This will be bolstered if these strategies are made statutory in the FWMA 2010:
  - NRW Heads of Place
  - Local Authority Executive Directors
  - NRW & LLFA Flood Risk Teams
  - DCWW
  - Landowner forums/representative organisations
  - Catchment partnerships (see R3)
  - Environment Agency
  - English LLFAs
- FCEC and Regional Flood and Coastal Groups who would have a review role.

**5.4 R3: Setup a framework for catchment partnerships**

**What:** Following the success of the Catchment Approach (CaBA) in England, as discussed in section 4.5, Wales should similarly set up a framework for catchment partnerships that bridge the gap between local delivery and strategic, spatial plans (e.g. River Basin Management Plans, Area Statements, Opportunity Catchments, Shoreline Management Plans or the proposed Catchment Resilience Strategies (see R2)). The spatial size of the catchment units will need to balance strategic scale and local-scale engagement. It is anticipated the units would fall somewhere between the WFD Waterbody Catchments (approx. 1154 in Wales) and Operational Catchments (114 in Wales), depending upon the local context e.g. geography, and existing collaborative setups. These different spatial scales are mapped in Figure 5-4.

They will be inclusive of the coast or where relevant, extend from existing coastal partnerships. This will embed collaborative working across the whole of the catchment, from source to sea. This will allow the partnerships to support the delivery of both the catchment resilience strategies and SMPs.

Each partnership would be hosted by an organisation (ideally a third-sector organisation, charity, or local authority) that would appoint a catchment manager. This person would be a dedicated agent of change, fostering collaboration and building trust and consensus amongst key actors to bring the right people together to create a catchment plan that aligns with wider policies and strategies but is crucially delivered from the bottom-up, through

engagement with key stakeholders in the catchment including local communities and farmers. This could also include joining up with water companies and their catchment approaches, whilst respecting the role of the regulator and the regulated.

The stated objectives of each partnership should be driven by a vision that links each locality with the national vision and catchment resilience strategies; top-down and bottom-up combined. The agreed case for change should be widely shared to induce stakeholders to consider strategic approaches over short-term fixes. Partnerships will be encouraged to consider how their work can deliver long-term resilience and adaptation to both society and the natural environment. There must, however, be recognition that following the initial scoping and planning, flood risk may not be the main priority, but water management as a whole might be. Catchment partnerships must be allowed to identify their own priorities e.g. water quality, drought risk, biodiversity loss. Identifying these priorities will support the improvement of flood resilience planning across each catchment and inherently include flood risk reduction. The expectation is, as has been shown in CaBA, that FCERM conversations can still take place within the partnership and help foster collaborative approaches between partners in the future. During the pilot phase of CaBA, partnerships were provided with a handbook which advised on the identification of roles, activities and the scope of the partnership. Creating a similar handbook for the new catchment partnerships will support their set-up and aid effective implementation. The handbook should include guidance on community engagement to ensure that the plans and visions developed are reflective of the community within the catchment as well as the organisations operating within it.

Catchment partnerships mustn't be seen simply as a 'budget option' to drive and reinforce existing structures, top-down ways of working and deliver on national strategies. They should be seen as an opportunity to deliver innovative, grassroots approaches that provide multiple benefits to the environment and communities. Partnerships can be subject to the demands of fundraising, onerous accountability procedures and eventual burnout. Adequate and sustained funding is paramount to success and in the long run, will deliver efficiencies if they can unlock non-governmental funding such as private investment.

An enabling activity linked to the establishment of catchment partnerships is the creation of NRW catchment coordinators. Where suitable, these co-ordinators would support the catchment partnership host organisation (see R9). Within CaBA, when no lead was identified initially for a catchment partnership, the Environment Agency stepped in to ensure the partnership was implemented. NRW catchment co-ordinators can take up this role whilst a catchment host is identified.

When creating partnerships, members/attendees of meetings should be senior in their organisations to ensure decision-making power, responsibility, and accountability. Credible and experienced staff will foster greater confidence in and amongst the partnership. Staff also need to have the capacity within their role to devote the necessary time and commitment to this area of work.

Setting up a 'one-stop-shop' website for all things catchment partnerships will provide a platform for the national hub (R10), similar to the [CaBA website](#). This website will hold



information about each catchment partnership, for example, who is leading the partnership, their contact details, what areas the partnership covers, what their priorities are and who is involved. Publicising this information will foster collaboration across partnerships and support the development of the partnerships.

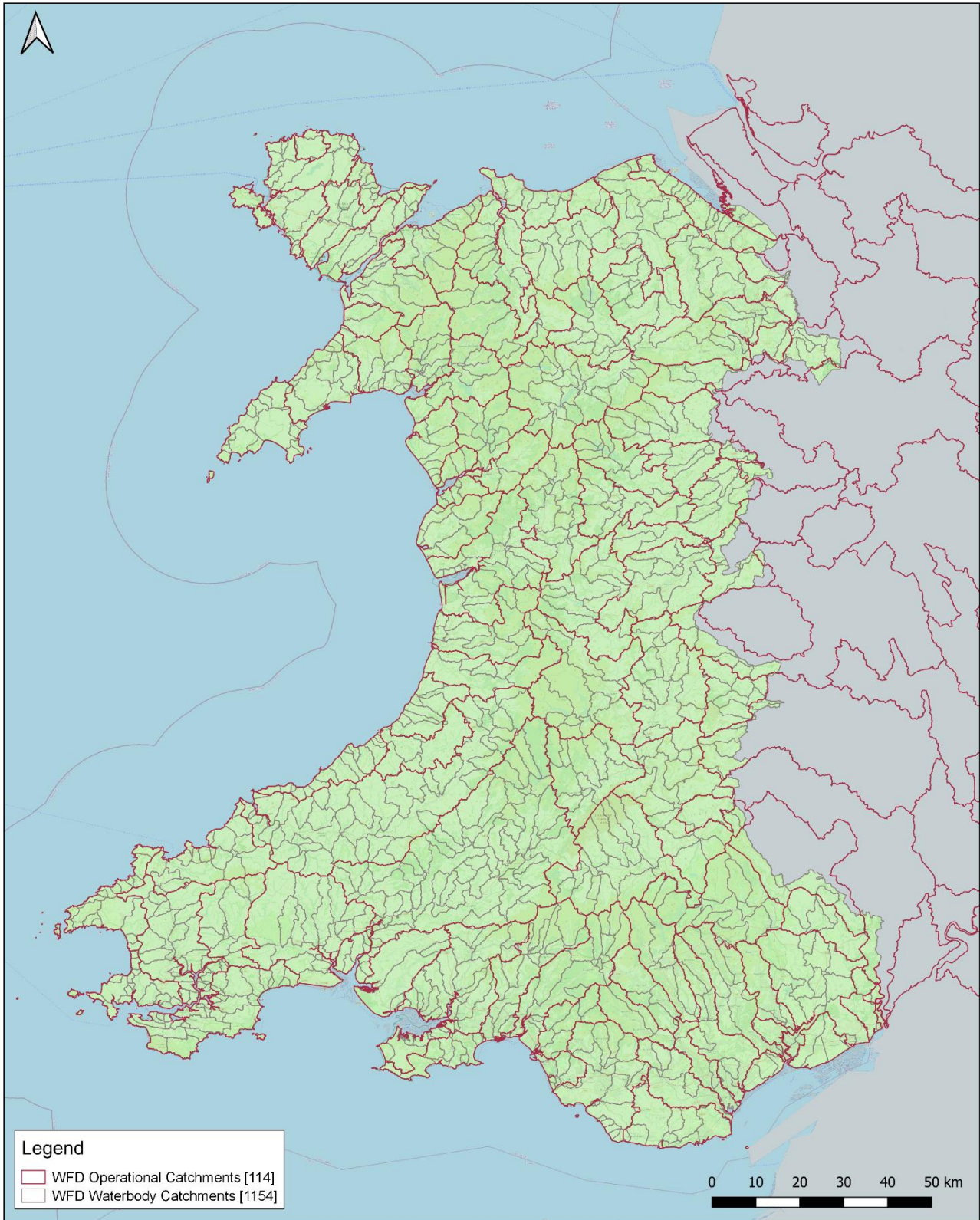


Figure 5-4 - WFD Operational and Waterbody Catchments in Wales

#### 5.4.1 Seed funding to enable Catchment Partnerships.

Up to 100% seed funding could be used to kick start the catchment partnerships across Wales and begin building necessary relationships, trust, and common ground amongst stakeholders. The fund (provided by the Welsh Government and eventually the Ministry of Climate Change - see R4) would initially target essential collaborative activities where funding is currently limited. Having a standard fee available to start partnerships would help eliminate current funding inconsistencies.

The funding should be made available to organisations which are interested in leading catchment partnerships. This could include protected landscapes (national parks and areas of outstanding natural beauty [AONBs]), local authorities and third-sector organisations. Seed funding could help quickly set up multiple partnerships, to gather learnings from practice on what additional work is needed and what barriers remain. This will help further test and identify the key enablers to partnership working in Wales. Such learnings can then be integrated into other funding streams and programmes, helping to build more robust partnership working models over time.

The outcome of this funding would be a blueprint for the art of the possible across a catchment. Important findings would include:

- Scoping suitable spatial scales.
- Assessing how existing successful partnerships can be built upon.
- An outline of the short-term actions to immediately help partnership working.
- Appropriate funding models for collaborative activities such as relationship building.
- Identifying any further support required to make the partnership successful.

Sustained funding will be required to support the organisations acting as a ‘host’ to a catchment partnership. In England, the 2020/21 Monitoring and Evaluation report estimated that each partnership had on average 0.4 full-time equivalent working on hosting. This funding should be used to fund many of the collaborative actions which are currently missing from funding models (such as time to build relationships). This should also be reflected in the length of time the funding is available to cover. It was consistently highlighted by stakeholders there is a need for long-term funding cycles to establish successful partnerships and strategic adaptive plans.

**Why:**

Issue	Proposed resolution
Unclear leadership on catchment partnership working	Leadership to be defined by partnerships being hosted by an organisation that would appoint a catchment manager and work with the NRW Catchment Coordinators (see R9).
Disconnect between central planning/strategy and those who would form partnerships	The disconnect would be overcome through the catchment manager. This dedicated agent of change will bring together key stakeholders for effective collaboration to align with the wider policies and strategies.

Issue	Proposed resolution
Unclear leadership on coastal adaptation	The catchment partnerships will be inclusive of the coast. The catchment manager will be responsible for ensuring the partnership's work is cross-disciplinary in nature where relevant.
Stakeholder disagreement preventing meaningful progress	The dedicated catchment manager will facilitate conversations between stakeholders who have conflicting points of view. Resolving issues within the partnership will reduce the impact of the disagreements on the progress being made. This approach has been successful in CaBA.
Funding cycles	Providing a long-term fund overcomes the issue of misaligned timing of plans and funding cycles.
Funding criteria	Funding is made available for the broader partnership-building activities as part of collaborative partnerships and to focus on building relationships.
Access to funding	Standard seed funding with lower barriers to access than a procurement exercise could help minimise the difficulties associated with funding, especially to create consistencies with delivery across county and country borders.

### How: Actions

- Collate information on existing catchment partnerships (including those crossing the border into England) - where they are located, who is leading and what their priorities are, this will help to build a picture of where there are gaps to be filled.
- Engage with CaBA in England to arrange a series of knowledge exchange workshops to maximise learning from their experience and approach to reduce the risk of duplicated processes. The workshops should also seek to agree on how the two catchment partnership approaches in England and Wales will work together going forward. This should eventually be distilled in a joint, collaborative plan outlining agreed ways of working.
- Engage with existing English partnerships which are operating in catchments that cross the border to formalise Welsh organisations' involvement where it isn't already happening.
- NRW catchment coordinators to fulfil leadership roles in the interim period whilst partnership hosts are identified.
- Use the seed funding to establish catchment partnerships in the short term whilst the long-term funding programme is developed.
- Set up a funding allocation process.
- Develop feedback mechanisms and evaluation framework to collect findings from an on-the-ground trial of catchment partnerships in Wales.
- Develop a handbook to assist the partnerships in identifying scope, structure and roles.
- Agree scope of the partnerships and ensure they align with wider strategies and policies, recognising that the main priority of the partnership may not be flood risk.



- Ensure organisational representation in the partnership is through senior members of those organisations. This ensures decision-making power, responsibility, and accountability.

**Who: Key actors**

- Welsh Government to set up the framework for catchment partnerships - identifying where they will be located, consulting relevant organisations to identify an organisation to host the partnership.
- Welsh Government to make funding available, eventually disseminated the Ministry of Climate Change (see R4).
- Welsh Government to establish a national catchment partnership hub (see R10).
- Third-sector organisations, charities, and local authorities to work with the Welsh Government to identify who will host the partnership and appoint the catchment manager. This could be facilitated by the Welsh Council for Voluntary Action.
- The catchment partnership host to work with NRW, third-sector organisations, local authorities and stakeholders to agree on the scope of the partnership.
- Partners should ensure there is senior representation and buy-in from their organisations.

**5.5 R4: Establish a 'Ministry of Climate Change'**

**What:** On 21 March 2024, Wales' new first minister, Vaughan Gething, announced a new Welsh Government Cabinet, which included a new Cabinet Secretary for Climate & Rural Affairs, Huw Irranca-Davies, succeeding Julie Jamies who had been the 'Minister for Climate Change'. Before this change, the list of responsibilities for the Minister of Climate Change was extensive, encompassing everything from housing, planning and regeneration to flooding, coal tips and transport<sup>6</sup>:

- 1) The housing and housing-related activities of Local Authorities and housing associations, including housing management and the allocation of social and affordable housing
- 2) Supply and quality of market, social and affordable housing
- 3) Second Homes
- 4) Homelessness and housing advice
- 5) Matters relating to housing provided by the private rented sector and regulation of registered social landlords
- 6) Aids and adaptations, including Disabled Facilities Grants and Physical Adaptation Grants
- 7) The provision of housing-related support (but not the payment of Housing Benefit)
- 8) The regulation of commercial tenancies let by Local Authorities
- 9) National Infrastructure Commission

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<sup>6</sup> <https://web.archive.org/web/20240118103623/https://www.gov.wales/julie-james-ms>



- 10) Oversight and implementation of the Planning Acts and all aspects of planning policy and the determination of called-in planning applications and appeals
- 11) Planning gain – Section 106 Agreements contained in the Town and Country Planning Act 1990
- 12) Developments of National Significance: determination of planning applications and connected consents
- 13) Building regulations
- 14) Future Wales: the national plan 2040
- 15) Regeneration, including Strategic Regeneration Areas; legacy regeneration; Transforming Town Centres and provision of sites and premises, derelict land and environmental improvements relating to regeneration
- 16) Transport for Wales
- 17) Transport policy
- 18) Roads, including construction, improvement and maintenance of motorways and trunk roads
- 19) Bus services
- 20) Rail services through the Wales and Borders franchise
- 21) Arms-length oversight of Cardiff Airport
- 22) Active travel
- 23) Road safety; safer routes to schools; transport for children and young people; regulation of pedestrian crossings and on-street parking
- 24) Marine and freshwater planning, biodiversity, conservation and licensing
- 25) Best and most versatile land policy, mineral site restoration advice and Agricultural Land Classification and implementation of the EIA (Agriculture) Regulations
- 26) Energy policy including small-medium scale energy production, domestic energy, energy efficiency
- 27) Renewable Energy
- 28) Climate change, emission reduction targets and carbon budgets
- 29) Natural Resources Management, including oversight and implementation of the Environment (Wales) Act and Natural Resources Wales
- 30) Cross-cutting measures of mitigation and adaptation in relation to climate change, including water; land drainage; flood and coastal risk; and control of marine and air pollution
- 31) Coal tip safety
- 32) Water
- 33) Forestry policy and legislation, including re-stocking, tree health and forest reproductive material
- 34) National Forest
- 35) Biodiversity policy, including the implementation of the Nature Recovery Plan
- 36) Sustainable resource and waste management
- 37) Local environment quality, including litter, fly-tipping and Deposit Return Scheme

- 38) National Parks
- 39) Local environment quality; Noise policy and regulation
- 40) Strategic lead on allotments and urban green infrastructure
- 41) Community Green Spaces
- 42) Access to the countryside, coast, rights of way and waterways/bodies of water
- 43) Areas of Outstanding Natural Beauty

Whilst such a long list of important areas points towards an acknowledgement of the need for cross-sectoral approaches to climate change, the reality on the ground is that many of these areas are being delivered in silos in separate government departments. To deliver a truly cross-sectoral approach to mitigating and adapting to climate change, there should be a 'Ministry of Climate Change' which brings all the above areas under one roof to work together. This could include the proposed new body to oversee compliance with environmental law<sup>7</sup>, the proposal for which is out for consultation until 30th April 2024.

Since the announcement of the new Welsh Government Cabinet, it appears that there has been a degree of restructuring, which perhaps reflects an acceptance that the existing list of responsibilities was too broad. However, a new Ministry of Climate Change should still be established to encourage cross-sectoral approaches as required by the WBFG Act. The current individual 'branches' within the Welsh Government relevant to the list above (e.g. Flood Branch, Climate Change Branch) should sit within the Ministry and be required to work closely with one another, sharing and pooling resources. This would increase the capacity of authorities to address climate change issues and enable better use of resources through cross-departmental working

The Ministry would have a similar remit to those of Defra and Cabinet Office in England by "leading and coordinating the government's response to cross-departmental challenges<sup>8</sup>", with a "core coordination role" for mitigating and adapting to climate change. It would be responsible for overseeing the implementation of climate change legislation and policy, (including the Climate Change Adaptation Strategy), monitoring and driving the delivery of priorities by other departments and holding them to account.

The structure would also be responsible for administering funding from a new cross-sectoral climate change adaptation fund (see R5).

**Why:**

Issue	Proposed resolution
Perceived absence of long-term direction for	The new structure would provide national leadership for strategy and collaboration and provide support to non-statutory bodies, avoiding difficulties that may arise when these bodies take on the

<sup>7</sup> <https://www.gov.wales/sites/default/files/consultations/2024-01/environmental-principles-governance-and-biodiversity-targets-white-paper.pdf>

<sup>8</sup> <https://www.gov.uk/government/publications/cabinet-office-outcome-delivery-plan/cabinet-office-outcome-delivery-plan-2021-to-2022>

Issue	Proposed resolution
adaptation and resilience	responsibilities of politically sensitive and resource-intensive issues without national programme support. It could also take the lead on identifying smaller-scale opportunities for work such as Nature Based Solutions (NBS) as opposed to larger flood-focused FCERM work.
	The structure would allow for longer-term planning and strategy without having to focus on the 'here and now' issues that affect NRW and local authorities' ability to undertake higher-level, strategic work.
Collaborative working and organisational restrictions	The structure would break down silos to help collaboration between various departments and bodies and help remove organisational restrictions that hamper cross-sectoral collaboration.
Line-of-sight / Monitoring	The structure would provide oversight and report on progress to the Welsh Government and line-of-sight to NRW.

### Who: Key actors

- **Welsh Government** to manage and oversee the setup and funding of the new structure
- Anticipated organisations involved in projects:
  - RMAs
  - Third-sector organisations such as flooding groups, national park authorities, and rivers trusts.
  - Landowners and farmers
  - Water industry
  - Other sectors such as transport, waste, education and healthcare
  - Local communities

### How: Actions

- Appoint a team to establish structure.

## 5.6 R5: Setup a cross-sector climate change adaptation fund

**What:** It is proposed a new fund should be administered by a new Ministry for Climate Change (R4). The fund should be focused on building long-term resilience and adaptation to climate change. It would be made up of contributions from cross-ministerial portfolios (e.g., climate change, agriculture, transport, environment) and therefore remove the emphasis and reliance upon FCERM-only funding and encourage projects tackling overall resilience. The fund should be accessible by RMAs, arm's length bodies, NHS, infrastructure owners, and third-sector organisations.

The fund would be split into two streams 1) infrastructure and 2) nature; so adaptation can be addressed for society and the natural environment. Crucially, it would provide a much-needed source of funding for coastal adaptation.

Innovation is a key objective of the proposed fund and should be embedded throughout. The fund would offer the opportunity for pilots and trials, helping to dismantle a 'fear to fail' culture. It is recommended that this approach would be similar to the [Flood and Coastal Resilience Innovation Programme](#) in England which has funded 25 local projects to demonstrate how practical innovative actions can improve resilience to flooding and coastal erosion in a changing climate. The fund has encouraged local authorities, businesses and communities to test and demonstrate innovative practical resilience actions in their areas and is using the evidence and learning developed to inform future approaches to, and investments in, FCERM.

This also links to workstream three's recommendation to '*pilot range of NBS drawing from a range of government funding sources and coordinated between different actors*' as well as '*prioritise nature-based solutions and natural flood management to reduce the exponential growth of infrastructure development and maintenance.*'

To access the fund, projects would need to demonstrate:

- How the funding would be used to deliver a partnership approach.
- How the project would aim to adapt nature or infrastructure to climate hazards. Such as drought, extreme heat, flooding, coastal erosion, water quality, and biodiversity loss.
- How the project can help build resilience, focusing on placemaking, response, protection, recovery, and adaptation.

The projects could include strategic activities such as adaptive pathways planning, or schemes which address climate change adaptation and deliver resilience outcomes. Stakeholders commented it is hard to justify expenditure on adaptive pathways through traditional revenue and capital funding; this fund aims to address this. Community involvement should be encouraged through the fund to develop area-specific solutions and build community climate resilience. Projects should consider building resilience via land management and long-term planning rather than concentrating efforts and funding on the growing need for flood defences. It would not fund small-scale natural flood management (NFM) or NBS projects, as this should be done via the Sustainable Farming Scheme (SFS) and by broadening access to existing NFM funds beyond RMAs. Instead, it should focus on larger-scale, strategic climate adaptation action.

**Why:**

Issue	Proposed resolution
Funding criteria	Obtaining funding for strategic approaches with broader objectives, rather than those focused on specific flooding issues.
Funding cycles	Funding is made available for developing long-term programmes to deliver adaptation and resilience.
Funding mechanisms and siloed working	Conflicting priorities across government departments mean there is a reluctance for other departments to contribute to anything viewed as being predominantly an FCERM scheme. Creating a resilience-focused fund should help reduce siloed working through cross-

Issue	Proposed resolution
	ministerial contributions, helping to unlock multiple benefits.
Funding criteria	Both fluvial and coastal projects should be funded by the programme, increasing the funds available for coastal adaptation.

**Who: key actors:**

- Welsh Government to manage and oversee the funding
- Anticipated recipients of funding:
  - RMAs
  - Third-sector organisations such as flooding groups, national park authorities, and rivers trusts.
  - Landowners and farmers
  - Water industry
  - Other sectors such as transport, waste, education and healthcare
  - Local communities

**How: Actions**

- To start the fund, funding should be focused on Pathfinder projects in the next 3 to 5 years that look at new ways of building resilience in Wales or exploring innovative alternative investment models.
- A framework for project selection should be developed, covering which climate hazards the project will focus on, how partnership working is integrated into the project and what innovative element is being trialled.
- Determine an appropriate evaluation framework and feedback mechanism.

**5.7 R6: Extend and align the FCERM Investment Programme**

**What:** Funding should be provided for long-term planning and for stakeholders to build the trust and relationships required for partnership working. This also links to workstream 3's recommendation "*ensure development/planning payments cover the cost of long-term flood risk mitigation work*".

A long-term revenue budget approach would support the creation of catchment coordinators, who need a level of guaranteed longevity in their role to build and maintain relationships with stakeholders. This was viewed as key to the success of the Upper Conwy Catchment Partnership which has had continuity of staff for at least 7 years and therefore has continued to strengthen stakeholder relationships and delivery.

Aligning a 5–10-year FCERM programme with the AMP cycle, used by other RMAs and infrastructure organisations such as DCWW and Network Rail, would open up opportunities to identify partnership approaches to delivering climate change adaptation and resilience to flood risk.

The Welsh Government should seek dialogue with the UK Government Treasury on alternative funding cycles for FCERM in Wales that will enable and promote longer-term



strategic approaches. This could initially be aligned with existing 3-year cycles (e.g. for Active Travel funding) until a more appropriate time frame is agreed.

Organisations which would require alignment include different governmental departments, regulators, and funding partners.

Seed Funding for FCERM could be used to kick-start the catchment partnerships, please see recommendation 4 for details.

**Why:**

Issue	Proposed resolution
Existing spatial plans are too broad	Obtaining funding for strategic approaches with broader objectives, rather than those focused on specific flooding issues.
Perceived absence of long-term direction for adaptation and resilience	Funding available for developing long-term programmes to deliver adaptation and resilience.
Funding criteria	<p>Conflicting priorities across government departments mean there is a reluctance for other departments to contribute to anything viewed as being predominantly an FCERM scheme. Creating a resilience-focused fund should help reduce siloed working through cross-ministerial contributions, helping to unlock multiple benefits.</p> <p>Both fluvial and coastal projects should be funded by the programme, increasing the funds available for coastal adaptation above current levels.</p>
Consistency of staff	Supported by the availability of longer-term funding, consistency of staff due to the ability for longer-term funding of posts will lead to improved partnership sustainability and effectiveness.

**How: Actions**

- The Welsh Government should seek dialogue with the UK Government Treasury on alternative funding cycles for FCERM in Wales that will enable and promote longer-term strategic approaches.

**Who: Key actors**

- Welsh Government
- HM Government.

**5.8 R7: Review and declutter plans, strategies and forums across the spectrum in Wales**

**What:** As demonstrated in Figure 2-3, there are numerous FCERM, environment, water and climate plans, strategies, and forums with differing boundaries. In addition, many are too

large in extent to be effective. A review should be carried out to ascertain where there is overlap in objectives, outcomes, extent, roles and responsibilities, and which can be removed or combined with others. Political boundaries can be subject to change over time, whereas the natural boundaries of coastlines and catchments are not. These should be the preference for the boundaries of any plans, strategies or forums relating to the natural environment. Groups and forums (e.g. PSBs and CJs) tend to overlap in their purpose and roles which causes confusion as to suitable attendees (strategic level) and which group should be approached for what area. The review should build on Audit Wales' 2022 report, '[A Picture of Flood Risk Management](#)' and expand into assessing the management of wider climate and environment objectives which are implicitly linked to strategic and spatial approaches to flooding, often relying on similar roles and organisations to deliver which leads to confusion and resource pressures.

A reduction in plans, strategies and forums will help provide clarity on who does what, supporting collaboration as it becomes clearer what the different plans/forums are trying to achieve and who to contact to begin collaboration.

**Why:**

Issue	Proposed resolution
Proliferation of new structures, plans, and collaborative arrangements	Expected that the outcome of the review would be a reduction in the number of individual groups, strategies and forums; a clearer purpose for each and clear links and collaboration between them. Fewer groups will make collaboration easier as there will be a clearer delineation of responsibility.
Existing strategic environment plans are too	The review should consider where boundaries of plans and forums are too broad to be considered effective or deliver action

**How: Actions**

- Develop a brief for Audit Wales to carry out a follow-up review of its Flood Risk Management report.

**Who: Key actors**

- Senedd Climate Change, Environment, and Infrastructure Committee to be responsible for developing the brief with input from a project advisory group including parties such as FCEC and the Climate Change Committee

## 5.9 R8: Strengthen the role of existing regional flood groups and coastal groups

**What:** Regional Flood Groups and Coastal Groups need to be adequately resourced to allow them to deliver a more effective role and substantive contribution to FCERM programme delivery across Wales. This could be through the provision of a programme manager and secretariat.

The groups could also play an important role in supporting and reviewing the proposed Catchment Resilience Strategies and the subsequent delivery programmes (R2). In having sight of several of the plans in their regions, they could help ensure that opportunities for collaborative catchment approaches are not being missed. The lack of a programme overview was highlighted in Section 3.1.1 and if given adequate time and resources, Regional Flood Groups and Coastal Groups could provide a regional programme overview, working alongside FCEC. This role would be similar to England's Regional Flood and Coastal Committees (RFCCs), whose role is to<sup>9</sup>:

- understand the flood or coastal erosion risk in their area
- make decisions on local flood or coastal erosion priorities
- understand and apply the national policies and strategies that guide their work
- design and oversee the programmes of work that protect the homes and livelihoods of people at risk of flooding or erosion
- develop and support the local partnerships that carry out this work
- raise resources that help us do more to manage local flood or coastal erosion risk
- make sure that society adapts to our changing climate by making communities more resilient and able to adapt in future

RFCCs and their role are recognised under the FWMA 2010, giving them a statutory responsibility. If Wales' Regional Flood Groups and Coastal Groups are to fulfil a similar role in Wales, they should also be recognised in the legislation.

### Why:

Issue	Proposed resolution
Current structures underutilised	The use and adequate resourcing of existing groups and organisations is an effective way to boost collaboration and contributions to FCERM project delivery. This would also answer criticism towards the Welsh Government for not reviewing the current landscape before setting up new arrangements and looking at what existing structures could be repurposed for collaborative working.

### How: Actions

- Finalise the role description of the Regional Flood and Coastal Groups.
- Recognise the roles of the Regional Flood Groups and Coastal Groups in the FWMA 2010.

<sup>9</sup> <https://www.gov.uk/government/collections/regional-flood-and-coastal-committees-rfccs>

- Appoint a programme manager and secretariat to strengthen the role of existing coastal and flood groups.

**Who: Key actors**

- The Welsh Government to appoint a programme manager and oversee the setup of the secretariat.
- Members of existing coastal and flood groups to be part of the secretariat.

**5.10 R9: Create NRW catchment coordinators**

What: Stakeholders agreed that NRW's involvement in catchment partnerships would be crucial. The literature identified issues with non-statutory bodies taking on responsibilities associated with politically sensitive issues which are resource-intensive with no other national programme support. However, NRW should not necessarily be the catchment partnership lead organisation, as there was a preference for a more 'neutral' agent, separate from the regulator. Stakeholders felt having the regulator lead partnerships may negatively impact engagement with some groups. NRW should, however, be represented in catchment partnerships by a dedicated coordinator whose role would be to support the partnership by connecting the right people in NRW with the various initiatives being delivered through the partnership. As discussed in section 5.4/R3, this role is an enabling activity for the establishment of catchment partnerships. This role may sit within an existing team (if necessary) and would take a co-leadership role, where suitable, with the chosen lead organisation. The role would allow non-statutory bodies to be supported by NRW, yet still allow an organisation with strong existing relationships with stakeholders to lead partnerships. The role would also be able to draw on appropriate expertise within NRW to support partnerships in technical areas. Revenue funding should be allocated to help fund this role.

**Overseeing Polluter Pays Fines**

The award-winning Community Interest Company, the Pembrokeshire Coastal Forum, came into being as a result of the Sea Empress oil spill disaster in 1996. Organisations, communities, and individuals coming together in the face of an event or issue is recognised as being a key driver for successful partnerships. Where these unfortunate events occur and fines or enforcement undertakings are paid, the proceeds should be used to fund the local catchment partnership (where one exists). This should cover pollution issues for both coastal and fluvial areas to maximise reach. It must be made clear that this mechanism cannot be used as an 'offset' to pollution but is instead a redirection of fines from illegal activities or pollution incidents.

It is suggested overseeing the polluter pays mechanism should be within the NRW catchment coordinator's role, with funds primarily directed into the local catchment partnership to help improve the local environment where an incident has occurred.

This should help increase the funding available for catchment partnerships and coastal adaptation.

**Why:**

Issue	Propose resolution
Unclear partnership roles	Provide support to non-statutory bodies for technical areas and politically sensitive issues associated with catchment partnerships through a dedicated NRW catchment partnership coordinator role.
	Have NRW represented in a role separate from the catchment partnership lead to help build strong stakeholder relationships within the partnership.

**How: Actions**

- Establish a clear role within NRW to support catchment partnerships using the Uwch Conwy Catchment Partnership as a model example.
- Welsh Government to increase revenue funding to start the role.

**Who: Key Actors**

- Welsh Government
- NRW

**5.11 R10: Create a national catchment partnership body/hub**

**What:** It is recommended a national catchment partnership body is established and funded to oversee and support catchment partnerships across Wales. This national hub would be a centre for:

- The overall steer for catchment partnerships
- Knowledge sharing
- Guidance on delivery
- Advice on potential funding routes, including green nature markets
- Sharing best practice
- Monitoring and evaluating success
- Facilitating collaboration through network development

This model would be similar to the CaBA model in England and could be officially linked with it. In the CaBA example, each year the hub produces a monitoring and evaluation report which highlights what the overall approach has achieved and how this has contributed to government-set targets. Lessons learnt from catchment partnerships established in the short term from seed funding should be fed into the national catchment partnership body and knowledge hub. A detailed summary of CaBA is provided in section 4.4.

Reflecting on the cost benefits of the scheme would form an important element of the annual evaluation. For the CaBA in England, for every £1 directly invested by the



government, CaBA partnerships have raised £1.6 from non-government funders<sup>10</sup>. Using the national catchment partnership body to help facilitate discussions, and processes and provide guidance on emerging green nature markets could help to kick-start private sector investment. This could complement government funding and maximise 'value for money'. The national catchment partnership body should make links with the Green Finance Institute which has recently published work on 'Financing Natural Flood Management'<sup>11</sup> which outlines a series of 'key enabling solutions' to unlock private sector finance to help scale the delivery of NFM. One solution includes funding for buyer facilitation and partnership development, which would allow organisations such as catchment partnerships to engage potential buyers of NFM features.

The body should be focused on delivering catchment resilience through partnerships, therefore covering biodiversity, water quality, flooding, drought, and other components of catchment resilience. The national hub should also be space for sharing evidence, experiences, best practise, and guidance on implementing catchment partnerships and the associated wider multiple benefits. Whilst is it proposed the cross-departmental climate fund focuses on the strategic development of resilience, the national catchment partnership hub should allow for, and fund smaller-scale projects and partnership activities to help implement measures which provide smaller-scale multiple benefits. This may also link to the recommendation from workstream 3, *"provide funding to resilience community groups to invest in community flood management"*. Once again, funding for the body should be long-term to allow catchment partnerships to be established. The hub would be a central point for private organisations to begin to be involved with catchment partnerships. These private organisations would then be allowed to help fund such partnerships; helping to tap into private finance in Wales and the developing green finance sector. The recommendation for a national hub partly links to workstream 3's recommendation, *"support NRW to develop a national approach to partnership funding including, large public sector estates, large private sector estates and green finance initiatives"* although it is not recommended NRW oversee the national hub. It is anticipated, similar to CaBA initially being funded by Defra, this catchment partnership body or hub could be initially funded by the 'Ministry of Climate Change' and supported by it into the future, but the organisation itself would be community/partnership-led.

**Why:**

Issue	Proposed resolution
Access to funding	Having a national catchment partnership body will help individuals and organisations know where to go for information and funding opportunities.
Funding criteria	Ensures all catchment partnership activities are funded, including a central hub to provide support, lessons learnt and guidance.

10 <https://catchmentbasedapproach.org/wp-content/uploads/2022/05/CaBA-Benefits-Report-2020-2021-CaBA-and-the-25YEPV0.2.pdf>

11 <https://www.greenfinanceinstitute.com/wp-content/uploads/2024/03/GFI-NFM-KEY-ENABLING-SOLUTIONS.pdf>

Issue	Proposed resolution
Unclear leadership	The body would act as a central hub providing steering, guidance, and funding to catchment partnerships, and will clarify leadership, support, and overall responsibility for catchment partnerships. As the body will be national it will remove administration challenges relating to areas of responsibility being confined to county boundaries.
Difficulties of establishing partnerships	The body will ease the process of setting up partnerships and facilitate collaboration between organisations and NRW.
Coastal partnerships	The body will support and fund both catchment and coastal partnerships and provide clear leadership for the latter.
Trust	Having a national body separate from NRW to facilitate catchment partnerships could help increase trust and goodwill in the process and enable the participation of more stakeholders.

### How: Actions

- Appoint a team to establish the national catchment partnership body.
- Establish a fund for the national catchment partnership body.
- Develop a financial evaluation framework to monitor cost-effectiveness from money invested.

### Who: Key actors

- Welsh Government (Ministry of Climate Change) to establish, fund, and oversee the body.
- Representatives from local catchment partnerships (NRW, other RMAs, landowner forums and third sector organisations) to contribute members and expertise.
- Audit Wales to develop and oversee the financial evaluation framework.

## 5.12 R11: Enable positive collaboration between FCERM and the farming community

The recently announced agricultural policy review in light of protests against the proposed Sustainable Farming Scheme (SFS) presents an important opportunity to assess how the SFS can be better designed to enable and foster positive collaboration between FCERM and the farming community. The sub-recommendations below highlight key elements of SFS and farming that need to be addressed in the review for the benefit of strategic and spatial responses to flooding.

### 5.12.1 Ensure all layers of the Sustainable Farming Scheme (SFS) are suitably funded and supported

**What:** The Universal and Optional Actions layers present a valuable opportunity to deliver the 'quick-win' NBS (e.g. tree and hedgerow management, winter cover cropping) that can be delivered by farmers with little need for collaboration or contributions from elsewhere. This should allow the Collaborative Actions layer and other available funding (e.g. the proposed cross-sectoral Climate Change Adaptation Fund) to focus on climate adaptation schemes that seek to deliver NBS at a larger scale e.g. floodplain restoration.

Underfunding the Universal and Optional Actions layers presents a risk that other funding that could be focused on delivering larger-scale NBS or adaptation actions through partnerships ends up being spent through short-term capital grants on smaller-scale NBS that farmers could have implemented easily themselves and been paid for fairly and properly via SFS. Suitable support (through on-the-ground guidance or mapping) will be required to help farmers locate NFM measures through SFS on their land to maximise the flood risk benefits. This could be provided by an NRW catchment coordinator or through catchment partnerships.

#### Why:

Issue	Proposed resolution
Access to funding	Increasing funding opportunities for key stakeholders such as farmers and agricultural landowners will increase the sustainability of catchment partnerships.
Funding criteria	Providing opportunities to increase the flexibility on how partnerships spend other funding supports partnerships' engagement and sustainability.

#### How: Actions

- Request that the Agricultural Policy Review considers the recommendations raised in this report.
- Consult with farming communities about how they would respond to changes to the Universal and Optional Actions layers of the SFS.

- Build a model to identify what the likely outcomes and benefits would be for differing levels of additional investment in SFS layers.

**Who: Key Actors**

- Welsh Government
- Farmers Union of Wales
- National Farmers Union (NFU) Cymru

5.12.2 Allow landowners, farmers and third-sector organisations to access NFM funding

**What:** To date, NFM funding from the FCERM budget has been given to LLFAs to explore opportunities and deliver measures on the ground. Feedback has shown that LLFAs have struggled to effectively do this on account of the fund being for capital works only, preventing LLFAs from paying farmers fairly on an annual basis for the areas of land being taken out of production and used for NFM. NFM funding should be opened to allow farmers, third-sector organisations, and others to directly apply for the money. This is in anticipation of not all farmers being eligible for or signing up to the SFS, therefore funds will need to be available to allow the progress of NFM delivery to continue outside of the SFS. The NFM Opportunity maps (anticipated publication in Autumn 2024) and Catchment Resilience Strategies (R2) should be used to identify the most suitable strategic locations and inform the allocation of funding.

**Why:**

Issue	Proposed resolution
Access to funding	Increasing funding opportunities for key stakeholders such as agricultural landowners will increase the sustainability of catchment partnerships.
Funding criteria	Providing opportunities to increase the flexibility on how partnerships spend funding supports partnerships' engagement and sustainability and will foster greater collaboration between farmers and other partners.

**How: Actions**

- Engage with farmers to understand the practicalities of accessing FCERM budgets.
- Assess what the broader implications of reducing funding to LLFAs might be.
- Consider how catchment partnerships could work with farmers and access the funding on farmers' behalf to reduce administrative burden. Learnings from the Upper Conwy Catchment Partnership should inform this.

**Who: Key actors**

- Welsh Government
- LLFAs
- Catchment partnerships
- Farmers Union of Wales
- NFU Cymru

### 5.12.3 Address land value tax systems when land is being used for nature-based solutions (NBS), to prevent permanent devaluation of land

**What:** Agricultural land that is used for NBS interventions - which can deliver multiple benefits - can often be devalued by current tax systems as a result of the land use change and it being taken out of 'Good Agricultural and Environmental Condition'. This can have significant impacts on a farmer's business and mental health and may prevent the delivery of NBS and diversification opportunities for a farming business. Without a change to this rule, progress in delivering NBS to deliver adaptation and resilience outcomes will be reduced.

**Why:**

Issue	Proposed resolution
Financial resources	Decreasing barriers to and impacts of farmer involvement with nature-based solutions schemes will help improve engagement with catchment partnerships.

**How: Actions**

- Liaise with government bodies to understand processes for repealing EU Regulation No 1306/2013 and what opportunities are available to update the relevant legislation, including its definitions.
- Liaise with farming representatives to identify how farmers could be appropriately compensated for implementing NBS interventions and whether there are opportunities to couple this change with other sought changes to provide greater traction with the government.
- Request the Agricultural Policy Review to consider these points.

**Who: Key actors**



- Welsh Government
- Farmers Union of Wales
- NFU Cymru



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