

Wales Coastal Flooding Review Project 7 Part B Report -Recommendation 38



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Context

Following the coastal flooding of late December 2013 and early January 2014, the Minister for Natural Resources asked Natural Resources Wales (NRW) to review the coastal flooding events. The Review was to be delivered in two phases and in collaboration with Risk Management Authorities (RMAs) in Wales^{1.} Phase 2 of this Review identified 47 Recommendations to improve Wales' resilience to coastal flooding.

Thirty of the Recommendations were packaged into ten Projects to reflect common technical themes, with the remaining seventeen addressed individually. The 10 Projects are listed below:

- Project 1 Flood Forecasting and Coastal Design
- Project 2 Flood Warning and Forecasting
- Project 3 Community Resilience
- Project 4 Operational Response
- Project 5 Coastal Defences
- Project 6 National Coastal Defence Dataset and Inspection
- Project 7 Skills and Capacity Audit and Roles and Responsibilities
- Project 8 Review of Coastal Groups
- Project 9 Coastal Adaptation
- Project 10 Infrastructure Resilience

This document captures the considerations made to address half of Project 7, being Recommendation 38, defined as follows:

Clarify roles and responsibilities amongst risk management authorities at both the local and national level as required.

Develop consistent and common communication messages and tools to convey roles and responsibilities to communities.'

This Recommendation was one of the top six priority themes from the Phase 2 Report and arises from identifying that the national network of coastal defences and the flood risk management service as a whole in Wales is complex and multi-faceted. In some locations and aspects of work this has contributed to a lack of clarity about roles and responsibilities within RMAs. This lack of clarity can in part contribute to community confusion and frustration. Improved clarity of roles and responsibilities will also improve the efficient and effective delivery of flood and coastal risk management outcomes. All RMAs need to work together to develop a shared understanding of both the risks and appropriate actions to manage them.

Practical delivery of this Recommendation has focused on coastal rather than all flood risk sources. It has also focused upon routine asset management considerations rather than those related to operational incident response as covered elsewhere by the Wales Coastal Flooding Review Project 4.

¹ A Welsh Risk Management Authority is defined in Section 6 of the Flood and Water Management Act 2010 as the Environment Agency (Natural Resources Wales since April 2013), a lead local flood authority, a district council for an area for which there is no unitary authority, an IDB for an internal drainage district that is wholly or mainly in Wales (Natural Resources Wales since all IDBs were placed in NRW with effect from April 2015) and a water company that exercises functions in relation to an area in Wales.



Summary of Roles and Responsibilities

Drawing upon relevant legislation, Welsh Government's National Flood and Coastal Erosion Risk Management (FCERM) Strategy, the second edition of the Environment Agency's Coastal Handbook and operational experience, this report summarises current Roles and Responsibilities with regards to coastal erosion and flood risk management as below:

The Welsh Government or the Minister for Natural Resources:

Produces and maintains the National FCERM Strategy for how RMAs manage risk from coastal and all other sources of flooding and coastal erosion. This Strategy is due for its first review from November 2016.

Sets the legislative and policy framework within which all RMAs in Wales operate. Approves SMP2s and is responsible for managing any disputes regarding SMP2s. Allocates funding to coastal local authorities and NRW for coastal flood and erosion risk management activities.

Sets the strategic direction and timescale for RMAs to implement coastal flood and erosion risk management policies and SMP2s.

Coastal Local Authorities:

Are the lead organisations for all matters relating to coastal erosion because of their role under the Coast Protection Act 1949.

Have the permissive power (i.e. they can do so at their discretion) to undertake coastal erosion risk management activities and also works on coastal flood risk with the consent of NRW.

Lead and support Coastal Groups, co-opting in any relevant organisation including infrastructure owners and operators.

Produce SMP2s where agreed by the Coastal Group.

Have powers under the Coast Protection Act 1949 to control third party activities on the coast, such as the construction of private defences or the removal of beach material. Have powers under the Flood and Water Management Act 2010 to designate assets or features – natural or manmade - owned by third parties which provide a flood or coastal erosion risk management benefit to prevent those features being altered, removed or replaced without consent.

Have powers to undertake flood defence works under the Land Drainage Act 1991 on watercourses which are not designated as 'main river' and which are not within an Internal Drainage District.



Natural Resources Wales:

Is the lead authority for all matters relating to flooding from the sea because of their role under the Environment Act 1995.

Has the permissive power to undertake coastal flood risk and coastal erosion risk management activities.

Has the permissive power to undertake main river flood risk management activities to the furthest downstream point that a watercourse is defined as a main river.

Has a general supervisory role ('the national strategic oversight role') over all matters relating to flooding and coastal erosion risk management, including informally advising other authorities on these matters as well as being a statutory consultee such as on planning matters.

Provides technical advice to Coastal Groups on producing and implementing SMP2s and provides comments to Welsh Government to inform the Minister's role to quality assure and approve those Plans.

Has powers under the Coast Protection Act 1949 to control third party activities on the coast, such as the construction of private defences or the removal of beach material. Has powers to designate assets or features – natural or manmade - owned by third parties which provide a flood or coastal erosion risk management benefit to prevent those features being altered, remove or replace it without consent.

Has powers to undertake flood risk and drainage works for all watercourses within an Internal Drainage District.

Has a duty under Section 18 of the Flood and Water Management Act to report to the Minister every two years on the implementation of the National FCERM Strategy and the work of all RMAs including on the coast. The second report will be created in summer 2016.



Consultation methodology

A questionnaire on roles and responsibilities was developed following a workshop session with RMAs in March 2015. All Coastal Local Authorities were then consulted by questionnaire on 10th July with a target response date of 24th July. All 15 Local Authorities had returned a response by 9th September. The questionnaire asked the following ten questions:

Question 1: Which organisation should lead on *determining need for new coastal protection defences* in a) rural communities and b) urban communities?

Question 2: Which organisation should lead on *determining need for new coastal flood defences* in a) rural communities and b) urban communities?

Question 3: Which organisation should lead on *delivery of new coastal protection defences* in a) rural communities and b) urban communities?

Question 4: Which organisation should lead on *delivery of new coastal flood defences* in a) rural communities and b) urban communities?

Question 5: Which organisation should lead on *managing existing coastal defence infrastructure* in a) rural communities and b) urban communities?

Question 6: Which organisation should lead on *identifying failing third party assets*? Question 7: Which organisation should lead on *direction for upgrading third party assets*? Question 8: If neighbouring coastal defence assets have different public body ownership, should *transferral of ownership* to one be considered to deliver more efficient inspection and maintenance? YES / NO.

Question 9: Should *integration with other relevant sectors outside of FCERM* (e.g. planning and transport) be driven at the national or local level, and by whom? Question 10: To date case studies from Flintshire (third party assets), Anglesey

(Beaumaris) and Gwynedd (Borth-y-Gest) Councils have been sourced to inform work on Recommendation 38. Please raise other case studies.

In addition to the above consultation efforts, *ad-hoc* feedback was gathered from routine meetings of Regional Flood Risk Management Groups and Coastal Groups in Wales to inform this report.



Consultation summary responses

Collation of the summer 2015 questionnaire responses are found in Appendix 1.

In summary, the overall view was that a clarification of roles and responsibilities at the coast would be helpful but that the extent of current issues and queries amongst RMAs did not appear to merit any formal change to the existing arrangements. Consultees saw no factor that justified taking a different approach for roles between rural and urban coastal communities. Consultees demonstrated a good level of understanding of existing legislation and Welsh Government's National FCERM Strategy. Responses recognised that where established management practices are presently working well via whichever RMA is deemed locally best placed to do so, they do not need changing and consequently no new national prescriptive approach is needed.

Collectively, the three main concerns noted in the consultation responses were: Resource limitations impacting upon effective delivery of roles and responsibilities; The need to mitigate organisational risk when conducting routine operations at the coast, and;

How to optimise collaborative working at the local level.

Each of these concerns are expanded upon below through reference to comments received in questionnaire responses:

Resource limitations impacting upon effective delivery of roles and responsibilities;

Responses indicated a general trend where comparatively well-resourced Local Authorities want to retain their lead role on coastal erosion risk management, whereas less well-resourced Local Authorities are looking for NRW to have a greater presence and potentially take the lead.

Perceptions of funding limitations were closely linked to views on local adaptation or of roles and responsibilities between RMAs; many responses indicated that they would not take on others' roles because they could not fund the work themselves, rather than anticipating that funding would come alongside the role another RMA was asking them to do.

Two responses referenced the value of the second edition Shoreline Management Plans (SMP2s) in focusing their limited resource to deliver lead roles as assigned per SMP2 action plan item. These responses indicate need for development of a common national view on the approach to delivery of SMP2s and consideration of how strong a driver SMP2 policies are when compared against other FCERM activities and priorities.



• The need to mitigate organisational risk when conducting routine operations at the coast.

Responses indicated that RMAs would not take on another authority's maintenance work because it is assumed ownership of the asset would automatically be needed. However this is not the case – maintenance can be done by a party other than the owner, if the owner agrees to this.

With regards to third party assets, numerous responses indicated that responsibility for maintenance, registering of defects and the need to identify and deliver an upgrade to the asset resides purely with the asset/land owner rather than it being part of each RMA's role.

• How to optimise collaborative working at the local level.

Collaborative working between partners is a core theme of Welsh Government's National FCERM Strategy and also new legislation such as the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. Effective collaboration could be delivered via NRW taking the national lead through their overview role, whilst coastal Local Authorities undertake local validation work and potentially lead if refinement and local level application is needed.

Discussions at the Workshop recognised the value of Coastal Groups for sharing and offering technical advice to professional partners to support their coastal flood and erosion risk management activities in a collaborative way at the local level.

Some memorandums of agreement or similar documentation do already exist to facilitate collaboration at the local level where one RMA is delivering the work of another. Discussions at the Workshop did however flag a reluctance that creation of such documentation is resource intensive, typically requiring Cabinet or Board level approval.

Responses recognised that road and rail infrastructure providers should be brought into discussions where cost-benefit appears uneconomical based upon properties protected from risk alone. Indeed, collaboration at the local level shouldn't be limited to infrastructure owners and managers but also include utility operators.



Recommendation 38 Discussion

Consultation to inform this report found that the changing organisational and financial landscape is highlighted as a key reason for ensuring that organisations can adopt the most flexible approach to delivering roles and responsibilities, be that individually or in partnership with others.

Therefore this report proposes that the existing national arrangements continue to be followed whilst allowing for local adaptation to nationally driven changes and/or local circumstances, rather than implement a tightly prescriptive approach that risks becoming less applicable over time. This position needs to be communicated effectively in order to minimise possible perceived inconsistencies; the remainder of this discussion section seeks to aid communications.

The discussion section below considers the following aspects of RMA activity on the coast:

- Clarity of leadership;
- Local transferral of RMA asset management responsibilities;
- Approach to third party asset management;
- Delivery of SMP2s, and;
- The planning and statutory consultee role.

Clarity of Risk Management Authority leadership

Local Authorities lead across Wales on coastal erosion risk management because of their role under the Coast Protection Act 1949. The Flood and Water Management Act gives coastal Local Authorities the power to carry out coastal erosion risk management works in another Local Authority's district if it is in line with Welsh Government's National FCERM Strategy and if the work in another's district is to manage a coastal erosion risk in its own district. The Flood and Water Management Act also gives NRW the power to do coastal erosion work in any coastal Local Authority's district if it thinks the work is desirable, having regard to Welsh Government's National FCERM Strategy. NRW can undertake such work at the request of a coastal Local Authority or the Minister or proactively.

NRW leads across Wales on coastal flood risk management because of its role under the Environment Act 1995. Coastal Local Authorities can also do works to mitigate coastal flood risk where they are best placed to do so. This is usually regarding the construction and maintenance of coastal flood defence structures in locations where they provide wider socioeconomic benefits, for example, a promenade with a local highway in a coastal town. In such instances, local working arrangements should be discussed and agreed in partnership between Local Authorities and NRW. Apart from asset system management, other types of coastal flood risk management activities such as flood forecasting, flood warning and statutory strategic planning (e.g. Flood Risk Management Plans under the Flood Risk Regulations 2009) are led by NRW.

Under the Coast Protection Act 1949, a coastal Local Authority's permissive powers are available to the Authority throughout its district without limitation, provided it is coast protection work. In practice however, any work is almost always going to be away from the 'Schedule IV boundary' as defined in the Coast Protection Act 1949, being the upstream limit in estuaries and rivers where waters are no longer classed as the 'sea' or 'seashore'. Beyond that boundary within an estuary, legislation gives the lead role to NRW for managing



flood risk from the sea and tidally influenced main rivers. In Wales it is generally the case that main river watercourses are designated as such down to the mouth of an estuary i.e. most estuaries are classed as a main river.

Recommendation 1: A national coastal overview map for Wales should be produced which can be used as a management tool by all Risk Management Authorities and to inform the public and other organisations. The map should show the current coastal operational lead roles (i.e. which RMA or third party is currently responsible for managing each part of the coastline) and capture variations through local agreements where in existence. Work undertaken by NRW in 2015 to refresh the North Wales Tidal Defence Survey and as referenced in Coastal Review Project 6, could offer land and asset ownership details to initiate development of this GIS map layer. The completed layer could be made visible on NRW's internal My Map viewer, be shared with RMA partners via the Lle Geo-Portal (http://lle.wales.gov.uk/home) and a summary, non-editable version published alongside the National Coastal Erosion Risk Management (NCERM) and SMP2 policy maps on NRW's external interactive map viewer. Discussions at the Workshop in March 2015 supported this Recommendation, subject to securing funding and resources to deliver and maintain the map viewer, optimising use of existing map viewing platforms and ensuring secure editing rights.

Local transferral of Risk Management Authority asset management responsibilities

The Flood and Water Management Act allows a coastal RMA to, with the appropriate consent where relevant, arrange for a person to exercise a coastal flood and/or erosion risk management function on its behalf. That person can be another RMA or another organisation or contractor.

There is nothing in law to prevent the commissioning RMA from providing the necessary funding or other resource, such as data, to the RMA or person it is arranging to exercise a coastal risk management function on its behalf. Such arrangements can take the form of a Memorandum of Agreement or other such established financial/legal mechanism.

A coastal RMA can transfer both ownership and ongoing maintenance requirements for a coastal asset to another RMA or person. There is nothing to prevent the provision of funding or other resource as part of that agreement.

A coastal RMA can arrange for another RMA or person to maintain a coastal asset without having to transfer its ownership. Again there is nothing to prevent the provision of funding or other resource as part of that agreement.

WLGA are keen to promote cross-organisational partnership work with formal or informal agreements made between RMAs. Some work is already happening, for example between Conwy County Borough Council and the Isle of Anglesey County Council, and WLGA are exploring the possibility to extend this further based on two established examples in England. Public sector co-operation agreements do not currently exist in Wales, but there is an existing Agreement for Mutual Aid in Wales with regards to resilience activities which could inform development of any future partnership agreements.



Approach to third party asset management

For any location on the Welsh coast either NRW or the relevant coastal Local Authority can identify the presence of a third party owned coastal asset. It would be good practice for whoever identifies that asset to inform and discuss it with the other. This will allow the Local Authority to add it to their local asset register if they wish and NRW to add to their strategic oversight of third party coastal assets across Wales.

Either the Local Authority or NRW can take steps to inspect the condition of an existing or newly discovered third party owned asset, require the owner to take remedial steps and if necessary take enforcement action if that request is not complied with.

Recommendation 2: NRW develop and maintain a national register of third party owned coastal flood and erosion assets. Much of the register will be populated from existing data held by coastal Local Authorities and NRW. It should include sufficient information to show the state of each asset, which have had owners served with improvement notices and the outcome (action or non-compliance). This will enable NRW to provide a national picture to Welsh Government on the extent of risk posed by third party assets and if necessary help inform Welsh Government's future legislation and policy to enable that risk to be addressed effectively and efficiently. Future implementation of this Recommendation should consider the outputs from both Project 5 (temporary and secondary defences) and Project 6 (creation of a national asset dataset and consistency in asset inspections procedures) of the Wales Coastal Flooding Review.

Delivery of Shoreline Management Plans

Coastal Local Authorities should continue to lead the implementation of SMP2s and any future review of them as they funded and own the current SMP2s and act as the social, welfare and often planning authority lead at the coast. Their approach to, and timetable for, implementing local adaptation at the coast is set by the Local Authority itself, taking account of prevailing Welsh Government policy, the current National FCERM Strategy and latest climate change projections. Links can be drawn here to Recommendation 41 of the Wales Coastal Flooding Review, regarding the future development of a local adaptation toolkit to support practical delivery of coastal change.

Welsh Government and potentially the new Flood and Coastal Erosion Committee should provide strategic direction on the approach and timetable for SMP2 implementation where requested by a Local Authority. That strategic direction should be cohesive and co-ordinated across all relevant Welsh Government departments (e.g. flood, marine, planning, regeneration, biodiversity, transport etc.) to enable local implementation to be effective. Links can be drawn here to Project 8/Recommendation 39 of the Wales Coastal Flooding Review, regarding Welsh Government's Review of the present and future role of Coastal Groups and the Coastal Group Forum in Wales.

NRW and other partners should support and deliver their elements of an SMP2's action plan, taking the direction for their approach and timetable from the lead Local Authority and being mutually agreed. Welsh Government should provide strategic direction on how it wants Local Authorities and NRW to monitor and report SMP2 progress. The high level bi-annual reports produced by NRW in accordance with Section 18 of the Flood and Water Management Act to report progress made by RMAs on delivery of the Act, could reference



overall SMP2 progress but there is a need for a separate, more detailed SMP2 progress reporting mechanism to be created.

The planning and statutory consultee role

Local Authorities should continue to consult NRW on any proposed coast protection scheme and NRW will in turn continue to provide advice to Local Authorities as part of its pan-Wales strategic oversight role, for example to ensure that measures proposed for one location do not cause a knock on effect that increases flood or erosion risk elsewhere in a coastal sediment cell or at the coastal end of a main river.

Local Authorities should continue to ensure that their lead local planning role and that of the National Park Authorities as appropriate reflect current and future coastal flood and erosion risk in their Local Development Plans and individual development planning decisions. For any location on the Welsh coast either NRW or the relevant coastal Local Authority can identify the new measures needed to adequately manage the coastal flood or erosion risk. That need can be, for example, improved flood forecasting, a new/expanded flood warning area, creation of a community flood plan or a new or improved coastal risk management asset. Whoever identifies that need should inform and discuss it with the other RMA. Effective delivery of this approach will allow: a) the Local Authority to assess its appropriateness in terms of the locality and local community and to the approach set out in the relevant SMP2, and; b) NRW to update its Communities at Risk Register which helps assess coastal flood risk on a nationally prioritised basis, as required by Welsh Government policy. The coastal Local Authority and NRW then should agree which one is best placed to lead on delivering that need in practice.

The building of any new Local Authority (or third party) coastal flood or erosion asset requires the consent of NRW. This is normally is done after funding has been secured from Welsh Government and other regulatory consents and permissions are acquired such as planning permission or a marine licence.



Conclusions

Consultation on Recommendation 38 to inform this report has found that existing legislation is generally well understood by RMAs in Wales and, whilst perhaps 'clunky' in places to apply in practice, there is currently a good level of collaboration and co-operation between RMAs to deliver effective FCERM. This report concludes there is no need for wholesale legislative change, however there are some minor matters that could be made clearer in the future, for example:

1) Enabling Local Authorities to receive exemption from marine licensing when undertaking drainage maintenance works on a beach as NRW already receive an exemption for such works.

2) Whether national infrastructure bodies such as the Trunk Road Agencies and Network Rail should be classed as RMAs too in the future.

Welsh Government plan to refresh their National FCERM Strategy during 2016/17, which could present an opportunity to address the matters.

Reflection and discussion within this report has generated the following Recommendations for future consideration:

Recommendation 1: A national coastal overview map for Wales should be produced which can be used as a management tool by all Risk Management Authorities and to inform the public and other organisations.

Recommendation 2: NRW develop and maintain a national register of third party owned coastal flood and erosion assets.

The outcomes from the Wales Coastal Flooding Review Projects 3 (Community Resilience), 5 (Coastal Defences), 6 (National Coastal Defence Dataset and Inspection), 7 (Skills and Capacity Audit) and Recommendations 39 (Review of Coastal Groups), will be influential prior to investing further resource to deliver the above two recommendations.



Appendix 1 – Data Request for Recommendation

Wales Coastal Flooding Review: Delivery Plan - Data request no. 7

This request relates to Recommendation 38 defined as follows:

Clarify roles and responsibilities amongst risk management authorities at both the local and national level as required.

Develop consistent and common communication messages and tools to convey roles and responsibilities to communities.

1) Which organisation should lead on determining need for new coastal protection defences in a) rural communities and b) urban communities? Please explain why.

The 15 responses were distributed as follows:

7 thought Local Authority.

1 thought Natural Resources Wales.

1 thought Natural Resources Wales in rural areas and either NRW or LA in urban areas.

1 thought NRW should take a national overview and identify areas at need of new defences (e.g. NCERM) and then potentially transfer to LA for local input and scheme justification.

2 thought the specific land or asset owner.

1 thought all RMAs in collaboration.

2) Which organisation should lead on determining need for new coastal flood defences in a) rural communities and b) urban communities? Please explain why.

The 15 responses were distributed as follows:

7 thought Natural Resources Wales.

1 thought NRW should take a national overview and identify areas at need of new defences and if refinement to support schemes is required then LA may take over as lead.

2 thought Local Authority.

2 thought the specific land or asset owner.

1 thought all RMAs in collaboration.



3) Which organisation should lead on delivery of new coastal protection defences in a) rural communities and b) urban communities? Please explain why.

The 15 responses were distributed as follows:

8 thought Local Authority.

2 thought Natural Resources Wales.

2 thought the specific land or asset owner.

1 thought whichever RMA led on determining need for the new coast protection defences.

1 thought the answer may vary depending on funding and prioritisation at a national (NRW)

4) Which organisation should lead on delivery of new coastal flood defences in a) rural communities and b) urban communities? Please explain why.

The 15 responses were distributed as follows:

7 thought Natural Resources Wales.

4 thought Local Authority.

1 thought it depends on the primary function of the asset, with LA leading if erosion and NRW if flood risk.

5) Which organisation should lead on managing existing coastal defence infrastructure in a) rural communities and b) urban communities? Please explain why.

The 15 responses were distributed as follows:

8 thought Local Authority.

4 thought the specific land or asset owner.

1 thought Natural Resources Wales.

1 thought whichever RMA promoted the infrastructure scheme originally.



6) Which organisation should lead on identifying failing third party assets? Please explain why.

The 15 responses were distributed as follows:

5 thought Natural Resources Wales.

3 thought Local Authority.

3 thought it depends on the primary function of the asset, with LA leading if erosion and NRW if flood risk.

3 thought it should be the asset owner paying supported by NRW and/or LA jointly.

1 thought it would depend on whether the upgrade was essential maintenance or capital improvement.

7) Which organisation should lead on direction for upgrading third party assets? Please explain why.

The 15 responses were distributed as follows:

7 thought Natural Resources Wales.

3 thought Local Authority.

2 thought the specific land or asset owner.

1 thought whichever RMA led on determining need for the new coastal flood defences.

1 thought the LA has an interest as landowner or Highway Authority and would therefore assume delivery lead for localised works, however if NRW sought to lead the LA would support delivery.

8) If neighbouring coastal defence assets have different public body ownership, should transferral of ownership to one be considered to deliver more efficient inspection and maintenance? **YES / NO**.

If your answer is 'YES', should the Local Authority or Natural Resources Wales take the ownership lead? Please explain why.



The 15 responses were distributed as follows:

4 thought 'Yes', 2 of which said NRW, 1 thought it depends on the primary function of the asset and transferred to the organisation with the greatest interest and 1 emphasised need for a nationally consistent dataset and inspection recording standards.

1 was 'unsure' however if 'Yes' it depended on primary function of the asset.

9 thought 'No' for example due to limited public body resources to take ownership of assets or questioning whether ownership can legally be transferred. 1 noted that collaborative working should be considered and another noted that efficiencies could be gained by better data sharing between organisations.

1 thought there was a need to share inspection regimes between organisations to assess if

9) Should integration with other relevant sectors outside of FCERM (e.g. planning and transport) be driven at the national or local level, and by whom?

The 15 responses were distributed as follows:

13 thought integration should be encouraged, with 9 opting for it to be nationally driven by WG, 3 opting for the local level and 1 suggesting a combination of the two and inclusion of Coastal Groups.

1 questioned whether there should be integration, with it being a political matter and in sectors outside of the current subject area.

10) To date case studies from Flintshire (third party assets), Anglesey (Beaumaris) and Gwynedd (Borth-y-Gest) Councils have been sourced to inform work on Recommendation 38. Please raise other case studies or queries below:

Anglesey: Beaumaris and correspondence with WG referring to the FWMA vs National Strategy.

Pembrokeshire: Newgale, albeit insufficient benefits for CPA grant in aid.

Conwy: Colwyn Bay Waterfront (not at the case study stage) future will require integration between LA and various transport/infrastructure providers.

Denbighshire: The role played by Network Rail infrastructure would make an interesting case study.

Gwynedd: anomalies at Pwllheli where it is protected to the east from tidal flooding by NRW but to the west by Gwynedd Council. Would be better if all managed by one organisation.

Thank you in advance for your contributions.



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