



Options for the Management of Flood & Coastal Erosion on a Regional Basis

July 2018

Welsh Local Government Association

The WLGA's primary purposes are to promote a better local government, its reputation and to support authorities in the development of policies and priorities which will improve public service and democracy.

It represents the 22 local authorities in Wales with the 3 fire and rescue authorities and 3 national park authorities as associate members.

Welsh Local Government Association

Local Government House
Drake Walk
Cardiff CF10 4LG

029 2046 8600 | www.wlga.wales
@WelshLGA

Published: July 2018
Copyright: Welsh Local Government
Association
ISBN:

Contents

Summary	4
Recommendations.....	5
1 Background.....	7
2 Introduction.....	7
3 Regional Collaboration Agenda and Footprints	8
4 RMAs Collaboration and FCERM.....	12
Regional flood groups and Coastal Groups	12
Capital delivery	13
Policy & Strategy	15
5 Opportunities for collaboration.....	17
6 Conclusion	21
Appendix 1- WG response to PAC recommendation 5.....	22



Summary

Flood and coastal erosion functions are mostly shared between Natural Resources Wales and Local Authorities as part of their wider flood and coastal erosion risk management (FCERM) remit as directed by the Flood & Water Management Act 2010 (FWMA, 2010) and Coast Protection Act 1949. The FWMA 2010 states that NRW has the responsibility of managing flood risk from main rivers and the sea whilst Local Authorities as Lead Local Flood Authorities (LLFAs) have the responsibility of managing coastal erosion risk as well as flood risk from surface water, ordinary watercourse and groundwater. Under the Coast Protection Act, both NRW and LLFAs as Coast Protection Authorities have certain powers to perform duties in connection with the protection of land in their area.

Whilst the report acknowledges the recommendation of the Public Account Committee for Welsh Government to work with Local Authorities to consider the options for the management of coastal flood and erosion on a regional basis, this report highlights that flood & coastal erosion functions are part of wider statutory functions linked with flood risk management and often highways and land drainage. Current set-up within local government means that these functions cannot be separated at will from the rest nor could they be efficiently delivered without close collaboration between Risk Management Authorities.

This report also draw attention to the fact that FCERM is only a small element within the services delivered by local authorities. The regional management of flood and coastal erosion risk must therefore fit within the wider regional working agenda driven by WG's White Paper '*Reforming Local Government: Resilient and Renewed*' if it is to receive corporate and political support. It also highlights that support for a regional footprint will only come if there is an overriding economic or delivery case, or if it is impacting on the delivery of services.

The WLGA therefore promotes as a first step a less formal approach to the regional management of flood risk from all sources focusing instead on collaboration for the delivery of specific projects or elements. This approach should grow organically through

the needs identified by the 3 regional groups and build on the good work already taking place and areas highlighted throughout the report.

However, the reports also recognise that in the face of ongoing budget cuts, loss of experienced staff and current capacity, actively promoting and taking forward regional working for the delivery of FCERM functions without supporting capacity is unrealistic and additional revenue funding to increase capacity should be made available to RMAs for this specific purpose.

Recommendations

R1 The 3 regional groups are not currently geared-up to drive the collaboration agenda due to a lack of seniority and the inability of current members to make corporate commitments. However, they provide the perfect platform to identify areas of opportunity to feed into strategic decision making.

- a) It is recommended that each of the current regional groups include regional working as a standing agenda item to identify areas of opportunity and agree priority areas. Initial scoping should be done in the form of a workshop and feedback provided to executive and the WG.
- b) Groups should also agree a clear mechanism for communication to ensure bi-lateral discussions between group members, their executive and portfolio members. This will ensure corporate support to take work forward and include FCERM collaboration as part of the wider regional work agenda.

R2 A report produced as part of Project 5 of the 2014 Coastal review identified that flood asset inspections suffered from duplication of work between RMAs. Furthermore, Information on the condition of coastal assets and inspection results were not being shared effectively amongst stakeholders. Flood asset inspections which will help provide up to date and accurate data to feed into the National Dataset of Flood Defences are well suited to a regional approach due to RMAs using the same asset condition scoring tool and work in this area should be initiated through the Regional Flood Groups.

- a) It is recommended that each Regional Group set-up a sub-group with asset inspectors from all RMAs to share inspection and maintenance programmes and records, identify duplication of work and develop a joint inspection programme and report back on progress by September 2018.
- b) A standing agenda item on asset inspection should be added to regional Groups' agenda to update on progress, ongoing work and identify potential areas of concerns and potential joint opportunities.

R3 Raising the awareness of flood risk is 1 of 4 Objective of the National FCERM Strategy and has therefore been embedded in Local FCERM Strategies as a key deliverable. With increasing threats of flooding linked with climate change and increased development it is important that communities are well informed and prepared.

- a)** A regional scoping exercise of flood awareness responsibility and activity should be undertaken amongst stakeholders. This will clarify priorities and identify gaps to evaluate how much engagement and resources are needed. Each Regional Group or a lead authority per region should then be responsible for developing a business case seeking corporate buy-in and funding to help deliver a flood awareness programme on a regional basis.
- b)** Proposed improvement to this area of work must consider future findings of the research currently undertaken by NRW in relation of the public micro-site, Sustainable Communities Engagement Programme and activities delivered as part of Flood Awareness Wales

R4 Whilst capital delivery is the area which has been the most successful in generating collaboration between RMAs, this is also the area which has been the most reliant on external contractors highlighting a worrying lack of capacity and expertise within the public sector to take forward this type of work. This continuing trend of externalising capital scheme development will lead to further depletion of skilled employees in the public sector and an over reliance on external contractors which will fuel an increase in costs as alternative delivery models are not available.

- a)** The WG and RMAs should work together to package the proposed pipeline of projects under the FCERM Capital Programme and schemes under the Coastal Risk Management Programme regionally to evaluate potential workload.
- b)** The WG, WLGA and RMAs should use these regional programmes to identify the resources and skills necessary to take schemes forward and enable RMAs to gear-up for it through increasing capacity and expertise in certain areas.

R5 Whilst the aim of regional collaboration is to improve the delivery of services through consistency and best use of limited capacity and expertise within local government, the initial outlay and manpower to develop such partnership is not currently present for services that do not generate an income.

Following completion of the work outlined in the other recommendations above, WLGA will discuss the evidence supporting the need for additional revenue funding with WG's FCERM Branch for the purpose of taking forward regional activities. The funding should also be made available for the purpose of increasing capacity to deliver regional works and be in addition to the current annual allocation of £1.1M to LLFAs under the ESD Grant.

1 Background

A report published by the Auditor General on 21 July 2016¹ considered the progress made by the Welsh Government and its partners on flood and coastal erosion risk management (FCERM). The report was considered by the Public Accounts Committee which conducted an inquiry at the end of the autumn 2016 term. A subsequent report was produced informed by the evidence provided by Natural Resources Wales (NRW), the Welsh Government (WG) and the Welsh Local Government Association (WLGA). The report which sets-out 10 recommendations was published on June 13th 2017².

The enquiry considered progress made by the Welsh Government against several aspects of FCERM including regional working which led to Recommendation 5:

'The Committee recommends that the Welsh Government works with Local Authorities to consider the options for the management of coastal flood and erosion on a regional basis and reports back by January 2018'.

WG accepted this recommendation in principle (see appendix 1) and tasked the WLGA to review the operation of the Regional Flood Groups, reporting examples of regional working, along with any opportunity for improvement particularly in relation to identifying other benefits such as tourism, and jobs.

2 Introduction

Flood and coastal erosion functions have historically and mostly been shared between Natural Resources Wales and Local Authorities as directed by the Flood & Water Management Act 2010 (FWMA, 2010) and Coast Protection Act 1949. The FWMA 2010 states that NRW has the responsibility of managing flood risk from main rivers and the sea whilst Local Authorities as Lead Local Flood Authorities (LLFAs) have the responsibility of managing coastal erosion risk as well as flood risk from surface water, ordinary watercourse and groundwater. Under the Coast Protection Act, both NRW and LLFAs as Coast Protection Authorities have certain powers to perform duties in connection with the protection of land in their area.

However, whilst both pieces of legislation try to clarify roles, there are still some uncertainties in terms of responsibilities as coastal defences and stretches of coastline can be owned by local authorities, NRW or third parties. This was further identified as a matter of concern in the 2014 Coastal Flood Review. Furthermore, it is also very difficult to dissociate responsibilities and management of pluvial and fluvial flooding from coastal flooding as their impact is often experienced jointly.

Against this backdrop, effective flood and coastal erosion risk management cannot be in its current format the responsibility of a single organisation. Joint working between Risk Management Authorities must be considered as the best possible approach at a regional and national level.

¹ <https://www.wao.gov.uk/news/welsh-government-making-progress-manage-increasing-coastal-flood-and-erosion-risks>

² <http://www.assembly.wales/laid%20documents/cr-ld11073/cr-ld11073-e.pdf>

As such, whilst focusing on Local Authorities as part of the wider collaboration agenda as set-out in the Local Government White Paper, this report will note the role of all RMAs in its consideration of options for the management of coastal flood and erosion on a regional basis.

3 Regional Collaboration Agenda and Footprints

The Welsh Government's statement of intent about the future of Local Government in Wales was set-out in the White Paper *'Reforming Local Government: Resilient and Renewed'*. The proposals set out arrangements for regional working; describe a strengthened role for councils and councilors and provide a framework for any future voluntary mergers.

The reform is driven by the need to support Local Authorities to address the financial challenges faced by public services and enable the ongoing delivery of better outcomes for local people and the improvement of communities.

The WLGA broadly supports the direction of travel, with proposals for certain key services to be delivered collaboratively and increasingly on a regional footprint. There is consensus from members however that such an increasingly regional approach to service delivery needs to be balanced by a commitment to and strengthening of local accountability and local democracy and must be viable economically.

Regional working is not new to local authorities. It has grown organically over the years and seen the development of 4 regional footprints based on the Cardiff Capital Region, Swansea Bay City Region, North Wales Economic Ambition board and Growing Mid Wales.

The first two of these regions already have binding agreements with the UK Treasury and Welsh Government in relation to their work on City Deals. North Wales is progressing a Growth Deal with UK and Welsh Government and in Growing Mid Wales the councils of Ceredigion and Powys have a long tradition of effective joint working. As a result, these de facto regional arrangements are now widely acknowledged as providing a basis for collaborative working. However, Welsh Government's recent Economic Action Plan identified three regions, grouping Mid Wales with the South West/Swansea Bay.

Mechanisms and appetite for facilitating collaboration are however more advanced in certain areas. North Wales for example, benefits from an existing infrastructure to support collaboration based on a regional model within the context of "being aligned to the strategies for the Northern Powerhouse and the immediate North West of England, specifically the strategy of the Mersey Dee Alliance and close partnerships including the Cheshire and Warrington Local Enterprise Partnership. This approach aims to support connectivity with the economy of Ireland, and the Growing Mid Wales Partnership.

There are many formal and informal collaborations which plan, commission and deliver services right across Wales. Whilst some services are inherently cross-border (e.g. transport; strategic planning), these collaborations are usually subject to robust business cases to evaluate their value and are driven by the need to build resilience in the face of financial squeeze; economies of scale and sharing of resources; spreading of best

practice; enabling more strategic decision making and greater consistency and dissemination of best practice.

North Wales Councils' Regional Emergency Planning Service

the integrated North Wales Councils' Regional Emergency Planning Service (NWC-REPS) became operational in July 2014. The project was driven by a need to build long-term resilience of the service and its creation was facilitated by the existing North Wales infrastructure to support collaboration and a commitment from Chief Execs.

Under the arrangement which was formalised through a Service Level Agreement, each Council has a dedicated Emergency Planning Liaison Officer as well as access to full back up from the regional planning service as a whole. Officers are based formally in two hubs – with the liaison officer spending significant time hot desking in their designated authority.

Benefits of this approach

- Improved resilience for partner councils due to the team's size (effectiveness);
- Improved focus of available resource by sharing specialist support and common tasks (efficiency);
- Ensuring greater consistency of response and dissemination of best practice amongst authorities (effectiveness); and
- Improved communication channels between the Local Resilience Forum individual authorities (effectiveness).
- Cash releasing financial savings



Case Study 1: NWC-REPS

Other less formal examples highlighting the individual and collective appetite for collaboration include (but are not restricted to) the South-East Wales Consultancy Framework between Blaenau Gwent, Caerphilly, Monmouthshire and Torfaen, and the Central Wales Infrastructure Collaboration (CWIC) between Powys and Ceredigion Councils. These type of arrangements have been put in place to facilitate the sharing of engineering consultancy and knowledge in order to deliver services to their customers more efficiently and effectively, and provide a certain level of resilience within local government.

North Wales Councils' Minerals and Waste Planning Collaborative Project

The structure of collaborative project was Agreed and implemented in April 2011 following a Service Level Agreement between 7 LAs setting out parameters of what would be delivered. Flintshire CC is the lead authority and 2 hubs are in place in Mold and Bangor.

Drivers

The approach was driven by the need to build long-term resilience for the small LPAs, reduce service failure of some Minerals and Waste services, and reduce costly reliance on consultancies and the inconsistent approach provided to national operators. The lack of career opportunities for staff dedicated to a specialist function was also identified as a key driver as well as the lack of opportunity to adopt best practice processes to optimise service efficiency and effectiveness.

Other major drivers were the availability of funding to support this collaboration and the commitment, expectation and support from Welsh Government for collaboration. There was also an acceptance by the senior officers that they didn't have the capacity to deliver collaboration themselves.

Benefits of this approach

- Sharing knowledge, expertise and resources
- Trying to bridge and develop the skills gap
- Consistent approach across the region
- More staff to cover work load in different authority areas
- Peaks and troughs in demand
- Element of neutrality, useful for controversial sites
- Opportunities for staff

Case Study 2: NW Minerals & Waste Service

However, joint organisational responsibilities for the delivery of FCERM being relatively new has meant that local authorities and Natural Resources Wales have not yet fully explored the potential for the management of (or part of) FCERM on a regional basis. Furthermore, this service may not be seen as a priority for local authorities due to minimal savings compared to prevailing ones like Social, Transport & Infrastructure, Waste. Several other factors may also contribute to the slow progress in this area:

- **Regional footprint vs FCERM footprint**

The 4 regional footprints based on the Cardiff Capital Region, Swansea Bay City Region, North Wales Economic Ambition board and Growing Mid Wales are the footprints of choice for the strategic collaboration agenda driven by the White Paper '*Reforming Local Government: Resilient and Renewed*'. Numerous activities have been driven based on these footprints.

FCERM however, has historically worked on different footprints aligned with the River Basin Districts or the 3 Regional Groups footprints. Opportunities and work in this area have been based on these footprints putting FCERM at odds with the wider local government aspirations.

Furthermore, continued uncertainties linked with WG's long-term aspirations and local government re-organisation, difficult discussion with City Deals on terms of reference and lack of funding to develop regional working has led to some smaller services that do not directly align with these footprints being overlooked.

- **Capacity and service set-up**

Duties under the Flood and Water Management Act have been added onto existing services (Highways and Land Drainage) and the majority of LAs' practitioners are therefore not solely dealing with FRM. In some cases, employees will spend 2 days a week or less on FCERM duties (consenting, enforcement, planning consultation, project and contract management) and the rest delivering other functions.

The WLGA's 2015 Skill & Capacity Audit undertaken as part of the Coastal Review highlighted that around 75 full-time equivalent (FTEs) on different contracts delivered these functions across the 22 LAs. As of November 2017, FCERM capacity within the public sector has not improved due to further budget cuts and an ageing workforce. There are currently 71.8 FTEs working across the 22 LAs but this is not an even spread, ranging from 0.5 FTE to 7 FTEs. The picture with Natural Resources Wales is similar and the ongoing internal re-structuring is expected to lead to further loss of fairly significant numbers of posts across the organisation.

- **Funding**

Flood risk management functions within Local Authorities have over recent years (2015-2018) been supported and in some cases entirely funded through WG's Single Revenue Grant (SRG). As of April 2018, revenue to local authorities for their flood risk management activities now comes directly from the WG flood branch and is ring-fenced for these activities.

Although the grant allocation slightly increased this financial year, a 50% cut from 2014 onwards impacted on the amount of activities that could be delivered to the bare statutory minimum without offering opportunities, capacity and time to identify, set-up and deliver collaborative arrangements. Effectively, successful examples of joint collaborative working have required additional FTEs to deliver such projects as well as finances to cover additional costs for specific support.

Capital funding allocation (75%-25% for LAs and 100% for NRW) coupled with a split in responsibility under the FWMA generally means that neither organisation is able to justify resources and funding for activities in areas outside of their remit. From a Local Authority's

perspective, there is stiff competition from all services for a share of capital funding whose allocation is driven by a Capital Strategy and local priorities.

- **Localism**

The loss of power and control as well as perceived loss of local knowledge are likely to be potential barriers to progress. Local choice and determination is at the heart of localism and local accountability through local Councillors' oversight and scrutiny has always been present.

Regionalising and/or centralising FCERM functions and statutory duties would require thought to be given as to how such duties would be discharged, either jointly or via another Risk Management Authority with concerns of losing local knowledge and local say. Effectively, FCERM encompasses an array of elements including delivery of capital schemes, statutory functions, awareness and community resilience which can be difficult to separate.

- **Logistics**

Forward planning, consultation, additional capacity, additional funding and time have been necessary to set-up the more formal arrangements. Administration, IT, hosting, risks, different strategies and priorities are often seen as unsurmountable issues to overcome with current capacity. Organisations are not in a position to allocate financial and human resources to set-up such arrangements across several authorities. Whilst some authorities are happy to collaborate with simple memorandum of understanding (MoUs), other will request Service Level Agreements (SLAs).

4. RMAs Collaboration and FCERM

Amid the ongoing pressure facing RMAs and the underlying factors slowing down progress, some wide ranging examples of collaboration regularly take place to help with the delivery of FCERM functions and mitigation of risks to communities in Wales. Whilst most of this work is voluntary, s13 of the FWMA 2010 which places a duty for co-operation and the Well-Being of Future Generations Act has acted as a further conduit for joint working.

Regional flood groups and Coastal Groups

Collaboration between RMAs already takes place through the 3 non-statutory regional flood groups (see figure 1). These groups which have been in existence since 2010 bring together practitioners from Local Authorities, Natural Resources Wales and Dwr Cymru Welsh Water and meet on a quarterly basis.

The groups are mostly used as a platform to share good practice, discuss and take forward nationally and regionally led initiatives, and priorities linked with the delivery of FCERM functions. They have also been heavily involved in the delivery of strategic activities as part of specific Task & Finish groups to help with the development of Flood Risk Management Plans, Ordinary Watercourse byelaws or the development of a s19 report template in the case of the South-East Group.

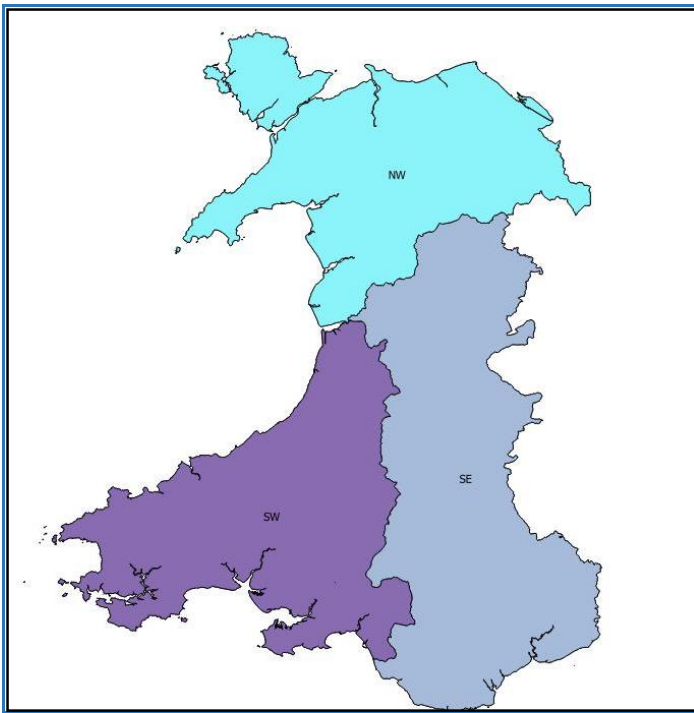


Figure 1: Regional FCERM Groups

Over the years numerous joint training exercises have been facilitated through the groups as well as research to identify operational opportunities or to provide the evidence necessary to inform strategic decision at a regional level.

Five coastal groups steered by the Wales Coastal Groups Forum (WCGF) are also in existence. These groups have a coastal specific remit and were set-up to oversee the delivery of Shoreline Management Plans (SMPs) and their Action Plans. Again, they bring together various stakeholders from all sectors and are used as a platform to share good practice and take forward SMPs Action Plans.

Capital delivery

Partnership working for the delivery of capital and maintenance works is the area which has been the most successful with a wide range of examples involving NRW, DCWW and LAs. Partnership work in this area is often driven by a need to tackle flood risk from multiple sources, make best use of public monies and time, and sharing workloads and opportunities between LAs to make best use of expertise through special arrangements.

There is an ongoing shortage of expertise within the public sector which continues to impact on the ability of RMAs to develop and deliver capital projects in-house thus over relying on external consultants for various project elements. Some authorities have, however, invested in FRM and been able to provide a service to other LAs to help develop capital projects.

Gwynedd, Isle of Anglesey and Powys Councils example

Gwynedd Council have over the years developed their engineering consultancy and expertise in coastal risk management. This has enabled the authority to provide a service to other departments and external partners whilst carrying on building knowledge in this area to meet internal and external demand.

Gwynedd have supported the Isle of Anglesey Council with the development of several Project Appraisal Reports as part of the Coastal Risk Management Programme (CRMP), and design of a flood alleviation scheme in Nant y Felin Pentraeth. Other schemes are also in the pipeline.

Powys and Gwynedd Councils have also developed an Engineering Memorandum of Understanding/Collaborative Alliance. The objectives of this agreement are to sustain robust engineering capabilities in each of the councils by sharing workloads and opportunities and to fully utilise existing capacity within the councils.

Benefit of such approach

- Building and keeping expertise within the public sector
- Financially competitive against private contractors' costs
- Streamlines procurement to meet quick turnaround of spend at short notice for WG.

Case Study 3- Memorandum of Understanding

In addition, there have been numerous other example of joint working between RMAs throughout Wales to help reduce the risk of flooding from all sources. This collaborative work further highlights how RMAs can bank on each other's strengths for wider benefits and to secure the best use of public money.

South-East Wales

Stephenson Street, Liswerry, Newport – This is a Newport Council owned asset, which is located on a main river. NRW have worked directly with Newport Council to develop an appraisal to submit to the Coastal Risk Management Programme (CRMP). NRW have agreed with WG and Newport to deliver this project on their behalf and once complete, NRW will be taking on ownership of the asset.

Whitchurch Brook, Cardiff - NRW helped with some of the modelling work for this LA led project

Risca, Caerphilly – A close partnership developed between NRW and LA to deliver the flood scheme in Risca. Various departments of the LA (property, parks, highways, communication) provided valuable support to the project and helped s to overcome many challenging issues. The LA contributed financially and provided a suitable site for the construction contractor to set up his compound.

South-West Wales

- Parc yr Onnon, near Aberystwyth, Ceredigion – Discussions ongoing with Ceredigion Council to look at a combination of flood risks in this area and mitigating measures.
- Boverton, Vale of Glamorgan – NRW helped with the modelling on this LA led project
- Cardigan – Ongoing discussion between NRW Ceredigion and DCWW for a potential partnership project.

North Wales

- St Asaph, Denbighshire –Ongoing issues with an ordinary watercourse in this location, the Glascoed Stream led to NRW and Denbighshire working together to deliver a solution for the OW alongside NRW's capital project.
- Llanfair Talhaiarn, Conwy – NRW are developing a collaborative project in relation to a highways culvert/bridge that the LA own. Conwy Council are supporting NRW with staff time helping with the specification of works and development of the project



Policy & Strategy

This area of work has also seen a lot of good collaborative work both regionally and nationally. At a national level, work has taken place collaboratively through Task & Finish Groups facilitated by the WLGA or in partnership.

Example of national initiatives include the production of Flood Risk Management Plans, recently updated Guidance for Local Authorities on Water Framework Directive and some initial work with the Marine Licensing team aimed at streamlining and delivering coastal risk management more efficiently.

Land Drainage Byelaws

The responsibility for issuing ordinary watercourse consents under section 23 Land Drainage Act 1991 passed from Environment Agency Wales to Lead Local Flood Authorities and Internal Drainage Boards in April 2012.

Since taking on this consenting duty and wider flood risk management function, practitioners noted that powers under the Land Drainage Act are limited and certain activities which are not currently consented could potentially increase the risk of flooding especially in more built up areas. It was therefore decided in 2013 to set-up a Task & Finish group to review existing Land Drainage byelaws and produce a new set specific to ordinary watercourse to help bridge the legislative gap.

The T&F group included members from 5 LLFAs, NRW, Welsh Government Flood Branch, WLGA and legal representatives from WLGA and NRW. The group commissioned initial research and produced a new set that was approved by the Cabinet Secretary in 2017. Several LAs and NRW for IDBs areas are now in the process of adopting these byelaws as policy.

Benefits

- Better control of activities which otherwise could increase the risk of flooding
- Cross-border consistency
- Multi benefits including delivery of WFD
- Deterrent reducing pressure on RMAs linked with enforcement

Case Study 4- Land Drainage Byelaws

Regionally, we have also seen an array of examples with North Wales being at the forefront of most regional initiatives. These have included training, joint procurement exercises and more recently the development of a Corporate Flood Response Plan by Conwy CBC through the North Wales Regional Emergency Planning Service.

The South-East Regional Group has also been working together to develop a regional template for s19 reports. The project lead was Caerphilly CBC with support of a T&F group. The template is now being used by the 10 LLFAs.

North Wales Sand Bag Policy

There is still a public misconception about the benefits of sand bags and expectation in terms of the service provided by Local Authorities. Cross border differences with sand bag policies and pressure from local members have also exacerbated the problem in some areas.

Taking into account these issues, Conwy Council decided to review their current Sand Bag Policy in 2017 and proposed through the North Wales Regional Flood Group to regionalise the policy for consistency and to reduce public confusion and expectation.

Conwy Council led the project and developed the joint policy with Gwynedd and Isle of Anglesey Councils. Following consultation with stakeholders and cabinet the policy was adopted by Conwy at the end of last year and is in the process of being adopted by IoA and Gwynedd Councils.

The key message to the community is '*are you ready for flooding*', implying that residents and business owners must be self-resilient and not reliant on the authority to provide and dispose of sand bags

Case Study 5- North Wales Sand Bags Policy

5. Opportunities for collaboration

There is a balance to be struck between strategic and local service delivery functions within a service area; for example, whilst it is appropriate to take strategic land use planning with its links to transport to the regional level, applying the same approach to all statutory functions under the FWMA, CPA and LDA is not so clear cut especially in terms of public value, local responsiveness and multi-agency involvement.

There are some successful examples of English Local Authorities delivering efficient and comprehensive regional coastal management service (Eastern Solent Coastal Partnership; Coastal Partnership East). This approach to coastal management challenges red tape and bureaucratic procedure and also allows a service to operate with its own vision and expectations while ensuring local priorities are met through a democratic management structure. While the underlying drivers are similar to Wales, these formal initiatives have however been driven by the needs of smaller English District Councils who may be struggling to meet their statutory obligations or generate sufficient workload to justify additional capacity.

FCERM is a non-income raising service with a limited pool of practitioners, a broad remit and is prioritised differently by local authorities which is reflected by the size of their teams. Regionalising this function based on current capacity could risk being unbalanced, reducing pressure on some while added additional workload on the more resourced ones. This would lend itself to more of a commercial service rather than 'true collaboration'.

There is a misconception that regional working systematically brings savings. In the case of FCERM in Wales, there needs to be an investment in additional capacity to be able to deliver the regional workload leaving existing practitioners to focus on more localised issues.

While the WLGA and this report will fall short of suggesting that the regional management of coastal flood and erosion on a regional basis is *the way forward*, we believe there are certainly areas that would benefit from a more structured and committed regional approach from LLFAs, NRW, DCWW and Network Rail.

However, the WLGA stresses that for any collaboration and sharing of resources to be secured, remuneration and the availability of additional funds must be in place for the regional collaborative aspiration to move to a reality. There is currently discussion about the possible allocation of ESF funding to facilitate collaboration and increase capacity at a regional level. Whilst such funding may help with inevitable transitional costs it may not be prioritised for FCERM duties. Additional transitional funding to support collaborative development would need to be made available through WG's FCERM budget.

The WLGA recommends WG's FCERM Branch to identify and secure additional revenue funding for the purpose of taking forward regional activities. The funding should also be made available for the purpose of increasing capacity to deliver regional works and be in addition to the current annual allocation to LLFAs under the ESD Grant.

Regional FCERM Groups

As noted in the report, these non-statutory groups have been in place since 2010. They are an invaluable platform to share expertise, facilitate collaboration and help deliver regional and national activities. However, they are not currently geared-up to drive the collaboration agenda due to a lack of seniority and the inability of current members to make corporate commitments. They are however, the perfect platform to identify areas of opportunity.

Similar to other non-statutory groups, officers attend these meetings as an add-on and increased pressure on public sector staff impact on the amount of additional work that members can commit to undertake on behalf of the groups. As such, the groups can suffer from a lack of strategic direction, making it difficult to focus activities and take forward specific work.

- a) It is recommended that each of the current regional groups should include regional working as a standing agenda item to identify areas of opportunity and agree priority areas. Initial scoping should be done in the form of a workshop and feedback provided to executive and the WG.***
- b) Groups should also agree a clear mechanism for communication to ensure bi-lateral discussions between group members, their executive and portfolio members. This will ensure corporate support to take work forward and include FCERM collaboration as part of the wider regional work agenda.***

Asset Inspection

Although RMAs have regular programmes of inspection and maintenance of their high-risk flood and coastal assets in place, information about coastal defence assets is not being shared effectively amongst stakeholders. Whilst we are starting to develop a national overview of coastal defence assets through the National Dataset of Flood Defences, this information is currently patchy.

The WLGA offered Flood Asset Visual Inspection training to all LLFAs to standardise asset inspection across RMAs. This was driven by the Coastal Review which also identified some duplication of work in this area between NRW and LLFAs and the creation of the National Database of Flood Defences requiring asset condition scoring.

With increasing risk and ongoing capacity issues in the public sector there is a vital need to avoid duplication, make best use of resources and to have a good knowledge of assets. As such, flood asset inspections are well suited to a regional approach and work in this area should be initiated through the Regional Flood Groups by forming a programme of work between LLFAs and NRW. Establishing the workload and existing capacity of partners to deliver a program would be the first step.

Such an approach could entice several LLFAs to build-up capacity in this area with a view to provide a regional commercial service.

- c) It is recommended that each Regional Group set-up a sub-group with inspectors from all RMAs to share inspection and maintenance programmes, identify duplication of work and develop a joint inspection programme and report back on progress by June 2018.***
- d) A standing agenda item on asset inspection should be added to regional Groups' agenda to update on progress, ongoing work and identify potential areas of concerns and potential joint opportunities.***

Flood Awareness

Actively raising the awareness of flood risk amongst communities has been very challenging for LLFAs due to a lack of available resources and this is endemic across the majority of LLFAs. Whilst some collaborative work takes place with NRW officers through the Flood Awareness campaign, most of these initiatives have only tackled coastal or fluvial communities.

The workload able to be generated by a single authority to deliver such activity is not sufficient to justify additional resources. Furthermore, funding for any additional post is not available. As such, this is again an activity which would benefit from being delivered regionally. Not only would a consistent message be developed but community engagement officers jointly funded by a group of authorities or organisations could receive specific training alongside NRW officers and generate sufficient work annually. The

workload could also be topped-up as necessary to provide wider messages on waste and climate change for example.

Raising the awareness of flood risk is 1 of 4 Objectives of the National FCERM Strategy and has therefore been embedded in Local FCERM Strategies as a key deliverable. With increasing threats of flooding linked with climate change and increased development it is important that communities are well informed and prepared.

- e) A regional scoping exercise of flood awareness responsibility and activity should be undertaken amongst stakeholders. This will clarify priorities and identify gaps to evaluate how much engagement and resources are needed. Each Regional Group or a lead authority per region should then be responsible for developing a business case seeking corporate buy-in and funding to help deliver a flood awareness programme on a regional basis.***
- f) Proposed improvement to this area of work must consider future findings of the research currently undertaken by NRW in relation of the public micro-site, Sustainable Communities Engagement Programme and activities delivered as part of Flood Awareness Wales***

Capital Scheme Development

Whilst this is the area which has been the most successful in generating collaboration between RMAs, this is also the area which has been the most reliant on external contractors highlighting a worrying lack of capacity and expertise within the public sector to take forward this type of work.

In the long-term, the continuing trend of externalising capital scheme development will lead to further depletion of skilled employees in the public sector and an over reliance on external contractors which will fuel an increase in costs as alternative delivery models are not available.

Resilience of public sector organisations is a long-term strategy requiring investment in people and skills. Some risk taking authorities have already invested in this area and developed consultancies offering an in-house service and further commercial opportunities. Similar models or Centre of Excellence could be explored regionally to provide services and reduce costs and delays linked with procurement.

Similarly to the English model of Partnership, these jointly funded Centres of Excellence could train employees and provide expert services to public sector organisations, or source this service from the various public sector consultancies and NRW's Project Planning Team. This approach could provide a strong basis for the resilience of FRM services in the public sector and a healthy and cost effective alternative to private consultancies.

Some of the existing MoU in place between LLFAs work with this principle in mind and have proven to be fruitful for all those involved.

g) The WG and RMAs should work together to package the proposed pipeline of projects under the FCERM Capital Programme and schemes under the Coastal Risk Management Programme regionally to evaluate potential workload.

h) The WG and RMAs should use these regional programmes to help identify the resources and skills necessary to take schemes forward and enable RMAs to gear-up for it. A subsequent business case should be developed to seek funding to increase capacity and expertise in certain areas. Potential host authorities to deliver part of these schemes should be identified.

6. Conclusion

Lack of capacity and technical expertise, as well as an over reliance on external contractors are seen by FRM professionals as the drivers and appetite behind the need to collaborate further for the delivery of FCERM functions. Corporately and politically however, FCERM collaboration is only a very small part in a bigger strategic incentive, all of which must be financially viable, justifiable and politically palatable to be considered and taken forward formally.

Whilst authorities have organically come together on the current regional footprints around city regions and sub regional working, current FCERM footprints are at odds. Trying to formally regionalise FCERM on either footprint could therefore be challenging. The WLGA would continue to favor current informal initiatives through the regional flood groups until a clearer picture around local government's reforming emerges.

Regionalising the management of coastal flood and erosion separately from other FRM functions and based on current service set-up and capacity would again be very challenging and complex perhaps increasing confusion amongst communities and practitioners alike.

This report therefore promotes as a first step a less formal approach to the regional management of flood risk from all sources. This approach should grow organically through the 3 regional groups and build on the good work already being developed and areas highlighted above.

Appendix 1: Welsh Government's response to PAC Report

Recommendation 5-The Committee recommends that the Welsh Government works with Local Authorities to consider the options for the management of coastal flood and erosion on a regional basis and reports back by January 2018.

Accepted There are already established regional groups working on coastal flood and erosion in Wales. The Welsh Government has asked WLGA to report on the way regional working is already happening in coastal flood and erosion management in Wales and how this can be further encouraged.

Background: The WLGA promote regional working through three regional flood groups including representatives of all Local Authorities, Welsh Water and NRW, and discuss risk management measures for coastal flooding and erosion as well as flooding from rivers and surface water.

In addition, there are 5 regional Coastal Groups in Wales, who are responsible for the preparation of the Shoreline Management Plans, and delivery of the actions within them (see response to Recommendation 3). The Coastal Groups encourage Risk Management Authorities to work together to deliver the actions, as well as share best practice between parties. The role of the Coastal Groups was reviewed by Welsh Government in May 2016 in consultation with Local Authorities, NRW and WLGA, and recommended the Terms of Reference of those groups be updated and standardised.

The Coastal Risk Management Programme is providing further opportunities for regional working between Local Authorities where appropriate.

The Cardigan Bay Coastal Group holds an annual meeting involving council cabinet leads from the Local Authorities of Ceredigion, Gwynedd and Pembrokeshire. This complements practitioners' meeting by raising awareness of ongoing work and future plans with those involved in political decisions and direction. This type of regional working at a political level for coastal issues could be encouraged in the other coastal groups. This should be led by the Wales Coastal Group Forum which meets regularly to share best practice.

The established links between Risk Management Authorities, the Wales Coastal Group Forum and WLGA help to ensure a consistent approach, encourage regional working and sharing functions, which is happening between Gwynedd and neighbouring authorities. However, Welsh Government will task WLGA to review the operation of the groups, reporting examples of regional working, along with any opportunity for improvement particularly in relation to identifying other benefits such as tourism, and jobs.

The Welsh Government has consulted on a White Paper on Reforming Local Government, and await the result of that consultation.

Timescale: Report to be produced by January 2018 Lead: WLGA