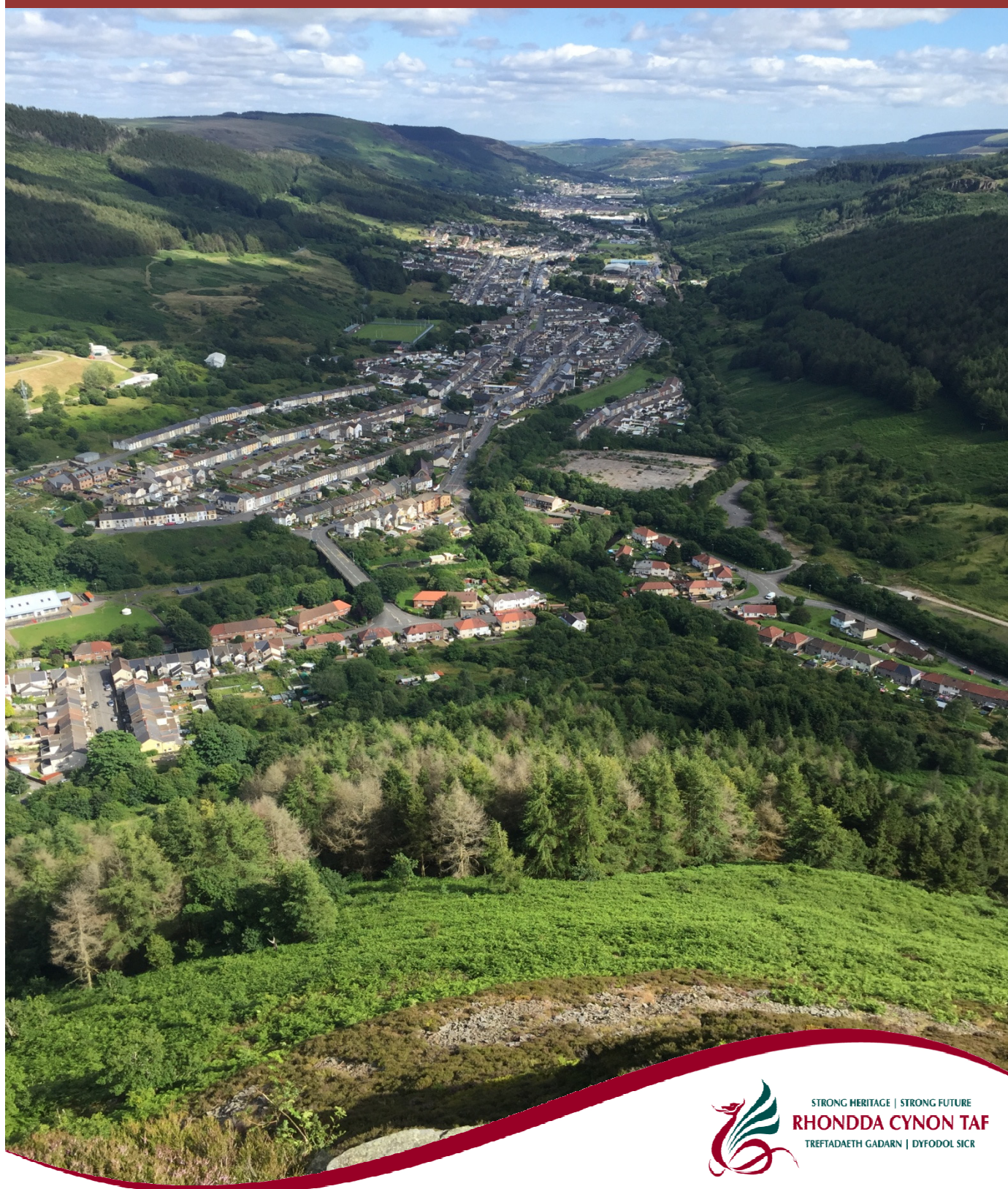


RHONDDA CYNON TAFF COUNTY BOROUGH COUNCIL

Flood Risk Management Plan

CONSULTATION REPORT



STRONG HERITAGE | STRONG FUTURE
RHONDDA CYNON TAF
TREFTADAETH GADARN | DYFODOL SICR

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GLOSSARY

DCWW	Dwr Cymru Welsh Water
FCERM	Flood and Coastal Erosion Risk Management Strategy
FRMP	Flood Risk Management Plan
LFRRMS	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
NRW	Natural Resources Wales
RBDMP	River Basin District Management Plan
RCT	Rhondda Cynon Taf
RCTCBC	Rhondda Cynon Taf County Borough Council
RMA	Risk Management Authority

1 INTRODUCTION

1.1 WHAT IS A FLOOD RISK MANAGEMENT PLAN?

Flooding remains a key threat to communities across Wales, and managing this risk through careful planning is important to minimise the risk to communities. Flood risk management planning allows Risk Management Authorities (RMAs) to develop a better understanding of risk from all sources of flooding and agree priorities to manage that risk.

This Flood Risk Management Plan (FRMP) has been developed with this in mind and sets out how Rhondda Cynon Taf County Borough Council (RCTCBC) will manage flooding over the next six years, so that the communities and environment at highest risk benefit the most. In doing so, this Flood Risk Management Plan takes forward the objectives and measures set out in our Local Flood Risk Management Strategy (LFRMS), published in January 2013. The Local Flood Risk Management Strategy for Rhondda Cynon Taf County Borough Council can be found by following the link at www.rctcbc.gov.uk/flooding.

This Flood Risk Management Plan also aims to achieve some of the objectives set out in the Welsh Government's National Flood and Coastal Erosion Risk Management Strategy (FCERM) which provides the national framework for flood and coastal erosion risk management in Wales through four overarching objectives:

- **Reducing the consequences** for individuals, communities, businesses and the environment from flooding and coastal erosion;
- **Raising awareness of and engaging people in the response** to flood and coastal erosion risk;
- **Providing an effective and sustained response** to flood and coastal erosion events; and
- **Prioritising investment** in the most at risk communities.

1.2 LEGISLATIVE CONTEXT

1.2.1 Flood Risk Regulations 2009

The Flood Risk Regulations 2009 transpose the European Union Floods Directive (Directive 2007/60/EC on the assessment and management flood risk) into domestic law in England and Wales. The aim of the Directive is to provide a consistent approach to flood risk across Europe.

Under the Regulations, Rhondda Cynon Taf County Borough Council were identified as a Lead Local Flood Authority (LLFA). While Natural Resources Wales (NRW) is responsible for producing Flood Risk Management Plans at a river basin district level for communities at risk of flooding from main rivers and the sea, Lead Local Flood Authorities are required to produce local Flood Risk Management Plans to manage flooding from surface water and ordinary watercourse.

The Flood Risk Regulations set out a six year cycle with timescales for reporting to the European Commission and the publication of 3 key documents:

- Preliminary Flood Risk Assessment;
- Flood Hazard and Flood Risk Maps; and
- Flood Risk Management Plans.

1.2.2 Flood and Water Management Act 2010

The Flood and Water Management Act 2010 was introduced in April 2010 in England and Wales and set to implement many of the recommendations made by Sir Michael Pitt's Review of the widespread flooding of 2007 in the UK. The Act was also intended to clarify roles and responsibilities between Risk Management Authorities (RMA's).

Under the Act, the Welsh Government was required to produce a National strategy for Flood and Coastal Erosion Risk Management. Lead Local Flood Authorities were required to produce a Local Flood Risk Management Strategy in partnership with other risk management authorities.

1.3 THIS CONSULTATION

This consultation, which covers the Draft Flood Risk Management Plan, was launched on the 14th September 2015. A copy of the consultation questionnaire and associated documents were placed on the flooding section of RCTCBC's website and publicised via a press release and social media. The consultation closed on the 30th October 2015. In total **5** direct responses to the consultation questionnaire were received.

Natural Resources Wales (NRW) provided multiple responses. One of which utilised the standard questionnaire format. Further comments were forthcoming from NRW specifically related to their role as assessor of compliance of the FRMP with the requirements of the Flood Risk Regulations (2009). Finally, comments were received from NRW's Taff Natural Resources Management Team concerning linkages with Water Framework Directive (WFD) objectives and the wider Severn River Basin District Management Plan (RBDMP).

Dwr Cymru Welsh Water responded to the consultation via correspondence (i.e. the standard questionnaire was not used).

No responses were received after the deadline.

1.4 STRUCTURE OF THIS REPORT

The main consultation was accompanied by a *Consultation Survey* containing specific questions relating to the Flood Risk Management Plan. Accordingly this *Consultation Response* is structured according to the questions contained in the *Consultation Survey*. Where respondents have made significant comments outside of the structure of the questionnaire, these have been dealt with accordingly.

2 PUBLIC CONSULTATION ON THE DRAFT FLOOD RISK MANAGEMENT PLAN

2.1 INTRODUCTION

During development of the Draft Flood Risk Management Plan, RCTCBC undertook a public consultation to determine if residents of RCTCBC felt the Authority have sufficiently addressed flood risk within the Plan.

Details of the questions posed, and responses received from the public consultation, are presented in Appendix A.

It is vital for the council to have this input from the public in order to address measures within the Flood Risk Management Plan of community engagement and partnership working.

3 CONSULTATION RESPONSES

3.1 QUESTION 1

Do you agree this draft plan sets out the most significant flood risk issues across Rhondda Cynon Taf County Borough Council?

Question 1 of the survey was designed to assess the public's understanding of flood risk and whether or not they agree with what RCTCBC has determined to be the most significant flood risk issues.

Consultation Responses

Respondents were generally content that the LFRMP sets out the most significant flood risk issues across RCTCBC. One respondent did however disagree with the assessment that the most significant areas of flood risk have been identified – stating that *“more specific areas should be targeted, (sic) as not to waste money”*.

Alterations to be made to LFRMP in light of consultation responses

None required. With reference to the respondent commenting that more specific areas need to be considered – we would stress that this would likely occur as the process of future project/action development and refinement occurs.

3.2 QUESTION 2

What do you consider to be the best measure for managing flood risk proposed within the Rhondda Cynon Taf County Borough Council Flood Risk Management Plan draft for consultation?

- ***Surface Water Modelling***
- ***Construction of Flood Defences***
- ***Pre-feasibility Studies/Project Appraisal***
- ***Flow Monitoring***
- ***Land Management***
- ***Establish SUDS approval body***

Question 2 of the Flood Risk Management Plan aimed to identify what measures the public felt RCTCBC should be taking to mitigate flood risk within RCT and whether or not these correlate to what RCTCBC have already identified as key measures.

Consultation Response

There was no discernible clear measure that responders considered to be the best means of managing flood risk. Two respondents specified *Land Management* as the key to managing flood risk; each of the remaining

consultation respondents chose *surface water modelling; Pre-feasibility/Project Appraisal; and Establish SuDS approval body* as their preferred measures for managing flood risk.

Alterations to be made to LFRMP in light of consultation responses

None required.

3.3 QUESTION 3

What do you consider to be the greatest cause of flood risk in Rhondda Cynon Taf County Borough Council area?

Question 3 of the survey aimed to understand the public's knowledge of flood risk. This was a key question to include as it addresses the EU reporting code, M43; Public Awareness and Preparedness.

Consultation Responses

Respondents identified that surface water runoff and blocked culvert inlets were the primary causes of flood risk within RCTCBC. This is broadly reflective of the assessments undertaken as part of the LFRMP and RCTCBC embedded knowledge of flood risk within the borough.

Alterations to be made to LFRMP in light of consultation responses

None required.

3.4 QUESTION 4

The Flood Risk Management Plan draft effectively targets and aims to achieve the objectives set out by the Welsh Government's National Flood and Coastal Erosion Risk Management Strategy (FCERM) of:

- ***Reducing Consequences***
- ***Raising awareness and engaging people***
- ***Providing an effective and sustained response***
- ***Prioritising investment***

In relation to the objectives above, do you agree or disagree with them?

Question 4 was used to assess the public's view on the wider flood risk objectives, set out by the Welsh Government for flood risk management across Wales. RCTCBC's measures stated within the FRMP are set to achieve these objectives; it is therefore important to understand whether or not the public agree.

Consultation Response

All respondents either fully or partially agreed with the high-level objectives which the FRMP aims to achieve via the implementation of appropriate measures.

Those respondents in partial agreement commented that whilst they agreed with the general concept and proposed implementation of flood risk management set out within the FRMP, they felt that flood risk management should be portrayed in a somewhat less idealistic manner, with appropriate regard to financial and locational constraints.

Alterations made to the LFRMS in light of consultation responses

None required

3.5 QUESTION 5

How do you think you, as an individual/organisation, could support the work set out in the Draft Flood Risk Management Plan to reduce flood risk?

The Flood Risk Management Plan has set measures which involve public engagement, awareness and preparedness. Question 5 therefore aims to identify how individuals of the public, or organisations as a whole, feel they are able to support the Flood Risk Management Plan's work to reduce flood risk within RCT.

Consultation Responses

Only three of the respondents commented specifically on this question. One of the responses indicated that they felt that the best means of supporting the work set out in the FRMP would be by '*reporting blocked drains*'. The further two comments were of a similar theme – namely that RCTCBC should aim to work in collaboration with both other risk management authorities; and within local communities in order efficiently implement the measures proposed within the FRMP.

Alterations made in light of consultation response

None required – RCTCBC note and welcome the responses on working in partnership with other stakeholders. RCTCBC have included two specific measures within the FRMP for *partnership monitoring* and *community/public engagement/consultation*.

3.6 QUESTION 6-7

Please tell us which of the community areas stated within the Draft Flood Risk Management Plan you current live in

Postcode

Questions 6 to 9 were used to gather information about respondents in order to identify what social and geographical factors might influence respondents' answers. Questions 6 and 7 identified whether the location of respondents within RCT had an effect on their attitude towards flood risk.

Consultation Responses

Only two of the respondents provided details of their community area – these were Porth and Cwmparc.

Alterations made in light of consultation response

None required.

3.6 QUESTION 8

I am completing this questionnaire:

- ***As a resident of the county borough***
- ***Representing a third sector organisation***
- ***As a business person***
- ***As an elected member***
- ***Representing a risk management authority***
- ***Other***

Question 8 was a general question which aimed to highlight what proportion of respondents were residents compared to other stakeholders.

Consultation Responses

Four of the five respondents indicated that they were residents of the county borough. The other respondent was representing a risk management authority.

Alterations made in light of consultation response

None required.

3.6 QUESTION 9

Under the Equality Act 2010 and the Public Sector Equalities Duty, the Council has a legal duty to look at how its decisions impact on people because they may have particular characteristics. Please tell us if you think these proposals will affect you specifically because of any of the following;

- ***You are male/female***
- ***Your age***
- ***Your ethnicity***
- ***You are disabled***
- ***Your sexuality***
- ***Your religion or belief***
- ***Your gender identity***
- ***You are single/married/co-habiting/in a civil partnership/divorced***
- ***You are pregnant***

- *The language you prefer to communicate in*

Question 9 highlighted whether or not respondents felt they would be more affected by the Flood Risk Management Plan as a result of their social background.

Consultation Responses

The only response to this question came from a single respondent indicating that they were disabled. No further details were provided.

Alterations made in light of consultation response

None required.

4 CONSULTATION RESPONSES FROM RISK MANAGEMENT AUTHORITIES

4.1 NATURAL RESOURCES WALES

4.1.1 Comments in relation to the requirements of Flood Risk Regulations 2009

Natural Resources Wales (NRW) have reviewed the FRMP within the context of the requirements of the Flood Risk Regulations (2009). A summary of NRW's comments and the subsequent response (if deemed required) from RCTCBC is provided in Table 4.1.

The comments received from NRW were minor in nature and have been addressed with subsequent modifications of the FRMP document as required.

4.1.2 Comments from Taff Natural Resources Management Team

Summary of NRW Comments:

The Taff Natural Resources Management Team indicated that they were generally supportive of the environmental statement (sic) but that it *'lacks detail and commitment/ambition'*. NRW have indicated that they would have expected to see more detail as to how the FRMP will link with the Severn RBDMP.

RCTCBC Response:

RCTCBC considers that the measures proposed in the FRMP appropriately link to the measures contained within the Severn RBDMP (ref. Table 12, page 65 of the FRMP). At 'plan' level, RCTCBC would consider it impractical to attempt to provide more detailed statement as to how the FRMP measures would adhere to WFD/RBDMP requirements. RCTCBC would however state, that these issues would be considered at an appropriate level of detail as specific projects and/or actions develop throughout the working life of the FRMP.

Table 4.1: Summary of NRW comments in relation to the requirements of the Flood Risk Regulations (2009)

FRMP Requirement	NRW comments	RCTCBC response
<p>A map showing the boundaries of the Flood Risk Area</p>	<p>A map of Rhondda Cynon Taf is included on page 39 which shows the boundaries of the Flood Risk Area. There is also a map showing the Flood Risk Area boundaries on page 47 and flood risk maps (all with the Flood Risk Area included) are present on pages 78 to 80).</p> <p>Initial review of this draft has deemed this appropriate to meet the requirements.</p>	<p>None required</p>
<p>The conclusions drawn from the flood hazard and risk maps published under Regulation 22 of the Flood Risk Regulations 2009</p>	<p>There are Borough wide conclusions included on page 69 and conclusions for the flood risk area on page 85. There are then more detailed conclusions from the flood hazard and risk maps for each community.</p> <p>Initial review of this draft has deemed this appropriate to meet the requirements.</p>	<p>None required</p>

FRMP Requirement	NRW comments	RCTCBC response
<p>Objectives for the purpose of managing the flood risk</p>	<p>Table 2 on page 27 and table 3 on page 28 contain the Rhondda Cynon Taf Local Flood Risk Management Strategy (LFRMS) Objectives. It is not clear if these objectives have been adopted as FRMP objectives. If so, the plan should say that the LFRMS objectives have been adopted as FRMP objectives.</p> <p>The Directive does ask for 'proposed measures for achieving those objectives', therefore we would expect there to be better linkages between the objectives and the measures in the plan. It does say on page 29 that the objectives are delivered by the suite of measures but we suggest that the FRMP measures need to be linked to the objective reference. I.e. in the tables on page 71 and 77, add a column for objective reference.</p> <p>Initial review of this draft has suggested that minor amendments are needed.</p>	<p>RCTCBC can confirm that the detailed objectives contained within the LFRMS have been adopted as objectives in the FRMP – a clarifying statement to this extent has been added to Section 5.1 of the FRMP.</p> <p>As suggested by NRW, LFRMS objectives of relevance to each FRMP measure have been appropriately cross-referenced in Table 9 (page 49 of the FRMP).</p>
<p>Proposed measures for achieving those objectives, and description of the proposed timing and manner of implementing the measures including details of who is responsible for implementation</p>	<p>Borough wide measures are included on page 71 and flood risk area wide measures are included on page 77. There are then measures against each community that include all the relevant fields including measure number, name, type, timing, status, responsible authority.</p> <p>Initial review of this draft has deemed this appropriate to meet the requirements.</p>	<p>None required.</p>

FRMP Requirement	NRW comments	RCTCBC response
A description of the way implementation of the measures will be monitored	<p>This is included on page 344. The measures within the plan will be subject to a formal review every 6 years with an annual review to assess measures implemented.</p> <p>Initial review of this draft has deemed this appropriate to meet the requirements.</p>	None required.
A report of the consultation	To be completed following consultation.	N/A
Where the person preparing the report thinks it appropriate, information about how the implementation of measures under the flood risk management plan and the river basin management plan for the area will be co-ordinated at a river basin level	<p>Table 12 on page 64 indicates how the Rhondda Cynon Taf FRMP has regard of and provides links to the relevant measures from the Severn River Basin Management Plan.</p> <p>Minor comment against 6.4.2 - should this read Severn Flood Risk Management Plan?</p> <p>Initial review of this draft has deemed this appropriate to meet the requirements.</p>	Terminology in section 6.4.2 adjusted as suggested.
How were the SEA and HRA requirements considered and met?	<p>Page 50 states that the LFRMS is still relevant and valid for the FRMP. We suggest that the link or address for the LFRMS SEA is referenced in the FRMP.</p> <p>Initial review of this draft has suggested that minor amendments are needed.</p>	As suggested, the SEA prepared in support of the LFRMS has been appropriately referenced and a link provided at the foot of page 51.

4.2 DWR CYMRU WELSH WATER

Summary of Dwr Cymru Welsh Water (DCWW) Comments:

DCWW have stated that they are generally supportive of the FRMP and the measures set out within.

In particular, DCWW have positively commented on:

- the inclusion of measures which acknowledge the need to protect key infrastructure;
- the fact that the FRMP considers the WFD and links with the objectives of the Severn RBDMP;
- the intention for RCTCBC to further develop their drainage/flood risk management asset register.

DCWW have additionally stated their desire to work in close collaboration with RCTCBC wherever possible in implementing the measures contained within the FRMP.

RCTCBC Response:

RCTCBC welcomes the positive response from DCWW on its FRMP. RCTCBC consider that no distinct amendments are required to the FRMP subsequent to DCWW's consultation response.

Appendix A

Consultation Questionnaire

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FLOOD RISK MANAGEMENT PLAN DRAFT FOR CONSULTATION

The Flood Risk Management Plan is a requirement of the Flood Risk Regulations 2009. It has been developed with the threat of flooding to communities in mind and sets out how Rhondda Cynon Taf County Borough Council will look to manage this risk over the next six years, so that the communities and environment at highest risk benefit the most.

As required by the Flood Risk Regulations 2009, a consultation on the Rhondda Cynon Taf County Borough Council Flood Risk Management Plan is being carried out between the 14th September 2015 and the 30th October 2015. The questionnaire welcomes your views on the plan and it is important that we have this input, as it provides the council with valuable knowledge at a local level.

Before answering the questionnaire you should consider the Rhondda Cynon Taf County Borough Council Flood Risk Management Plan draft for consultation (www.rctcbc.gov.uk/flooding).

- Q1 Do you agree this draft plan sets out the most significant flood risk issues across Rhondda Cynon Taf County Borough Council?
- Yes
 - No

If no, please explain what you think is missing.

- Q2 What do you consider to be the best measure for managing flood risk proposed within the Rhondda Cynon Taf County Borough Council Flood Risk Management Plan draft for consultation?
- Surface Water Modelling
 - Construction of Flood Defences
 - Pre-feasibility Studies/Project Appraisal
 - Flow Monitoring
 - Land Management
 - Establish SUDS approval body

Other, please specify

Q3 What do you consider to be the greatest cause of flood risk in Rhondda Cynon Taf County Borough Council area?

- Groundwater
- Surface Water Runoff
- Blocked Culvert Inlets
- Highway Drainage
- Ordinary watercourse (i.e. non Main Rivers)
- Combined Sewers

Other, please specify

Q3 The Flood Risk Management Plan draft for consultation effectively targets and aims to achieve the objectives set out by the Welsh Government's National Flood and Coastal Erosion Risk Management Strategy (FCERM) of:

- Reducing Consequences
- Raising awareness and engaging people
- Providing an effective and sustained response
- Prioritising investment.

Do you: (*please select one option*)

- Fully agree
- Partially agree
- Disagree

Please give a reason for your selection

Q6 How do you think you, as an individual/organisation, can support the work set out in the Flood Risk Management Plan draft for consultation to reduce flood risk?

ABOUT YOU

Q7 Please tell us which of the community areas stated within the Flood Risk Management Plan draft for consultation you live in:

Q8 Please tell us the postcode of your property:

8 I am completing this questionnaire:

- As a resident of the county borough
- Representing a third sector organisation
- As a business person
- As an elected member
- Representing a risk management authority

Other (*please specify*)

Q9 Do you feel that your views on this consultation are different in any way because of who you are, or are perceived to be, as an individual? (e.g. use of Welsh language, marital status, nationality, gender, age etc.)
Please give a reason for your answer

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