

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL
CLIMATE CHANGE, PROSPERITY & FRONTLINE SERVICES SCRUTINY
COMMITTEE

MARCH 2023

REPORT ON THE INITIAL PUBLIC ENGAGEMENT FOR THE
AUTHORITY'S REVIEW OF THE LOCAL FLOOD RISK MANAGEMENT
STRATEGY AND ACTION PLAN

REPORT OF DIRECTOR OF FRONTLINE SERVICES IN DISCUSSIONS
WITH THE RELEVANT PORTFOLIO HOLDER; THE LEADER OF THE
COUNCIL; CLLR ANDREW MORGAN OBE.

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1. PURPOSE OF THE REPORT

- 1.1 The purpose of this report is to provide the Climate Change, Prosperity & Frontline Services Scrutiny Committee with the opportunity to consider the responses to the initial non-statutory public engagement exercise for the revised Local Flood Risk Management Strategy and Action Plan (formerly known as a Flood Risk Management Plan), as required under Section 10 of the Flood and Water Management Act (FWMA) 2010.
- 1.2 The report is required to be brought before Scrutiny as part of the program of work required to deliver the review of the LFRMS and Action Plan, which was agreed by Cabinet on 29th November 2022.

2. RECOMMENDATIONS

It is recommended that: -

- 2.1 Members consider and scrutinise the content of this report together with the public engagement exercise report contained in Appendix 1.
- 2.2 Members comment on the report to help shape and inform the drafting of the revised LFRMS and Action Plan.

3. REASONS FOR RECOMMENDATIONS

- 3.1 To enable Climate Change, Frontline Services & Prosperity Scrutiny Committee to consider the consultation and comment on the report to inform the drafting of the revised LFRMS and Action Plan as per the programme of work which was agreed by Cabinet Members on the 29th November 2022.

4. BACKGROUND

- 4.1 The publication of the second iteration of the National Strategy for Flood and Coastal Erosion (FCERM) in Wales in October 2020¹ triggers the requirements under Section 10 (5) of the FWMA 2010 for the Council as the LLFA to review its current LFRMS and publish a revised version within 2 years of the National Strategy publication. It has been advised by the Welsh Government (WG), however, that the date for publication of the revised LFRMS is October 2023.
- 4.2 At the time of writing, the Welsh Local Government Association (WLGA) has suggested that due to delays in the production of Natural Resources Wales's updated Flood Risk Assessment Wales dataset and WG guidance, the publication date for the LFRMS and Action Plan may be delayed to March 2024.
- 4.3 The decision to commence with the review of the Council's LFRMS and Action Plan was agreed by Cabinet Members on the 29th November 2022.
- 4.4 As part of the agreed program of works required to deliver the review of the LFRMS and Action Plan, an initial non-statutory public engagement exercise was published prior to the drafting of the revised LFRMS to identify what key themes the constituents of RCT want the revised LFRMS and Action Plan to focus and improve on.
- 4.5 The initial public engagement exercise was conducted in-house and ran for a period of six weeks, from the 13th December 2022 to the 24th January 2023.
- 4.6 An overview of the results and feedback provided via the initial public engagement exercise is incorporated into an 'Initial Public Engagement Report', attached as Appendix 1, which is presented to Scrutiny Committee.
- 4.7 The results and feedback from the public engagement exercise will be used to inform changes to the revised draft LFRMS and Action Plan,

¹ [National Strategy for Flood and Coastal Erosion Risk Management in Wales \(English\) \(gov.wales\)](https://gov.wales)

alongside national and local corporate policy changes produced since the first iteration of the LFRMS in 2013².

- 4.8 For the purpose of developing the questionnaire as part of the public engagement exercise, 8 key themes were identified, and relevant questions grouped together accordingly. These 8 key themes include;
1. Awareness of flooding and flood risk management (FRM)
 2. Roles and responsibilities for FRM
 3. Public perception of FRM priorities in RCT
 4. Climate change and FRM
 5. Communication of FRM
 6. Sustainable Principles in FRM
 7. Resilience Themes
 8. Asset Management
- 4.9 Each of these 8 key themes have highlighted items to prioritise within our revised draft LFRMS and Action Plan. Each theme will be discussed individually by highlighting the key findings from the public engagement exercise, critically analysing and discussing the results, and summarising the key changes proposed within our revised draft LFRMS and Action Plan.

5. AWARENESS OF FLOODING AND FRM

- 5.1 Since the first iteration of our LFRMS in 2013, the number of constituents within RCT who have been affected by flooding has increased, largely as a result of the impacts from Storm Dennis in February 2020. Storm Dennis was estimated as being in excess of a 1 in 200 annual probability (Q200) flood event which resulted in approximately 1,500 receptors being internally flooded.
- 5.2 As a result of Storm Dennis, in addition to the estimated 55 subsequent storm events (to date), the results from the public engagement exercise indicate a greater number of people are increasingly aware of their flood risk in their local area which is assumed to be as a result of the more frequent and extreme flood impacts occurring at a community level.
- 5.3 The number of respondents which state that their local area has experienced flooding previously has almost tripled since the publication of our initial public engagement exercise for the 2013 LFRMS.
- 5.4 The number of respondents who have taken various steps to prepare for flooding has also increased since the publication of our initial public

² [Local Flood Risk Management Strategy January 2013](#)

engagement exercise in 2013. Based on the results of the public engagement exercise, the majority of respondents have signed up for flood warnings, taken actions to find out more information on personal flood risk and purchased flood resilience/resistance equipment for their properties.

- 5.5 It is evident that the impacts of Storm Dennis has left behind a legacy of concern and apprehension amongst the constituents of RCT when it comes to flooding. Since the last public engagement exercise in 2013, a greater number of constituents in RCT are more aware of flooding and flood risk in their local area. A greater number of residents and business owners also wish to take pro-active action to build resilience against the impacts of future flooding.
- 5.6 Based on the distribution of responses received when asked whether they had been affected by flooding, the majority of responses were received from areas which experienced main river flooding. It is therefore little surprise that main river flooding was noted as the primary source of flooding in RCT according to respondents. Main river flooding was followed by culverted watercourses and surface water, with sewer and groundwater flooding scoring lowest in terms of perceived importance.
- 5.7 The National Strategy for FCERM does in fact note that surface water is the primary source of flooding in Wales. The results from the Communities at Risk Register (a decision making tool produced by Natural Resources Wales to provide an objective means of identifying risk and prioritising FCERM investment at a Wales wide, community level) also highlights the significant pluvial risk in RCT, whereby RCT accounts for over 22% of the national pluvial risk. As the LLFA with powers to manage the risk of flooding from local sources, RCT's revised LFRMS will highlight these key datasets to demonstrate how we as the LLFA assess flood risk in RCT, and also to help raise awareness and access to information on FCERM amongst the public.
- 5.8 The results from the public engagement exercise has highlighted that greater communication of our LFRMS is needed. 47% of respondents were not aware that RCT has a LFRMS and 41% stated that they were 'neither satisfied nor dissatisfied' with the quality of our LFRMS.
- 5.9 An overwhelming amount of responses from the public stressed the importance and need for improved communication and raising awareness of flooding, flood risk management and the available support capabilities of Risk Management Authorities, organisations and agencies. Raising awareness of flood risk in communities is also stressed throughout the National Strategy on FCERM as key to delivering all 5 objectives.

- 5.10 The objectives, measures and actions within the Council's revised LFRMS and Action Plan will strengthen the LLFA's role in supporting the communities of RCT through improving access to information via awareness-raising activities and digital improvements.

6. ROLES AND RESPONSIBILITIES FOR FRM

- 6.1 When asked whether the public were aware of what a Risk Management Authority (RMA) is and whether they were aware of which RMAs in RCT are responsible for the different sources of flooding, the majority of respondents stated 'No'.
- 6.2 Only 35% of respondents were aware of the role of RCT as a LLFA before taking part in the public engagement exercise.
- 6.3 Whilst not designated flood RMAs, riparian landowners have rights and responsibilities under common law to maintain their assets for the purposes of managing flood risk and residents and business owners are responsible for the protection of their own properties against flooding. Despite 65% of respondents responding that they are aware of their responsibilities to protect their own property against flooding, only 16% of respondents were aware of their responsibilities as a riparian landowner.
- 6.4 The results from the public engagement exercise suggest a lack of understanding regarding the roles and responsibilities of RMAs and non-designated RMAs for managing flood risk from different sources. Once again, the need for improved communication has been highlighted by the public as a priority for the revised LFRMS to address.
- 6.5 The recent iteration of the National Strategy on FCERM has provided clarification of the roles and responsibilities around flooding. This will be replicated within our revised LFRMS and Action Plan.

7. PUBLIC PERCEPTION OF FRM PRIORITIES IN RCT

- 7.1 The majority of residents see reducing the risk of flooding wherever possible as the primary aim for the LFRMS. This aligns with the objectives detailed within the Council's current LFRMS and also with the aim of the National Strategy for FCERM in Wales which is to 'reduce the risk to people and communities from flooding and coastal erosion'.
- 7.2 Internal flooding to homes was ranked the most important in terms of priority for FRM in RCT. This aligns with the objectives set out in the Council's current LFRMS.

- 7.3 The management and maintenance of drainage infrastructure including culverts and road gullies was highlighted as an important concern amongst respondents in terms of flood risk management in RCT. The management and maintenance of assets across the borough is increasingly acknowledged as a key flood risk management activity for the LLFA, for example, in response to the damages caused during Storm Dennis, the Council have established two dedicated 'Pluvial Drainage Teams' to increase their resource capability to target the refurbishment and maintenance of RCT's existing and enhanced drainage infrastructure. The management and maintenance of assets has been further discussed in Section 12 of this report.
- 7.4 Emergency planning and response to flood events was also noted by respondents as a key concern amongst the public in terms of flood risk management in RCT. Although the production of emergency response plans is already included as a measure within the 2013 LFRMS, in addition to being a statutory requirement of the Local Authority as a Category 1 responder under the Civil Contingencies Act 2004, further measures and actions to improve awareness of flood risk and build preparedness would complement the delivery of emergency response plans in RCT. For example, providing residents with resources and information on how to prepare, respond and recover from future flood events.
- 7.5 The promotion of Sustainable Drainage Systems (SuDS), the use of Natural Flood Management and increasing enforcement activities all ranked as least important in terms of what RCT and its partners should be doing to manage flood risk in RCT. This is considered to be due to a lack of understanding amongst the public regarding these functions and their importance in terms of managing the risk of flooding in a sustainable way as they are emerging technologies but are recognised in the Councils 'Tackling Climate Change Strategy 2022-25'³.
- 7.6 Constructing flood alleviation schemes in the highest risk areas was ranked by the public as the most important thing that RCT and its partners should be doing to manage flood risk in RCT. Although the development and construction of Flood Alleviation Schemes in RCT will play an essential role in managing flood risk over the next 6 years, incorporating a sustainable approach to FRM by promoting greener and more natural FRM solutions and raising awareness of the impact certain activities can have on flood risk through enforcement will all play a part in managing and adapting to the risk of flooding in RCT.
- 7.7 The responses received as part of the public engagement exercise have highlighted that further actions to promote the significance of greener

³ Think Climate RCT [Pdf \(browsealoud.com\)](https://www.browsealoud.com)

and more natural FRM solutions are required in our revised LFRMS and Actions Plan. This has been further discussed in Section 10 of this report.

- 7.8 Managing expectations surrounding flood risk management was also highlighted as a concern for the revised LFRMS and Action Plan to address. As stipulated within the National Strategy for FCERM, “it is not possible, nor is it sustainable, to protect all areas from flooding”. Flooding cannot be prevented entirely. Flood alleviation schemes reduce, but do not completely remove the risk of flooding, therefore there will always be a residual risk of flooding that drainage and defence assets cannot address. Raising awareness with the public, and prioritising investment to the most at risk communities in RCT is therefore essential for managing this residual risk. The revised LFRMS will continue to communicate the importance of utilising a risk based approach for managing flood risk in RCT.

8. CLIMATE CHANGE AND FRM

- 8.1 Climate change and increasing rainfall was noted by respondents as a key concern amongst the public in terms of flood risk management in RCT.
- 8.2 There is an urgency for action amongst the public as flooding is clearly acknowledged as a major issue made worse by climate change, and events such as Storm Dennis have only increased climate change awareness in RCT. This is supported by the results of the public engagement exercise which found that the majority of residents agree that there are new issues in relation to climate change that the revised LFRMS should seek to address.
- 8.3 Adaptation and building resilience into both physical assets and amongst the community were highlighted as key objectives for the revised LFRMS and Action Plan in terms of helping to address climate change issues. This includes maintaining assets, promoting green infrastructure and NFM techniques which were all highlighted as key considerations within the public’s responses.
- 8.4 Improved community engagement and raising awareness of flood risk in addition to partnership working with the relevant RMAs were also highlighted as key objectives for the revised LFRMS to address the risk of climate change.
- 8.5 Using a risk-based approach to prioritise flood risk management actions was also raised by residents as important, which also aligns with the objectives set out in the National Strategy for FCERM.

- 8.6 Several points raised by the public during the public engagement exercise align closely with the aim, objectives and measures set out by the Welsh Government in the National Strategy for FCERM which also build upon many of our existing objectives, actions and measures within the 2013 LFRMS and 2015 FRMP.
- 8.7 Addressing how the revised LFRMS and Action Plan will respond to the climate change emergency and the associated risks will be prioritised.

9. COMMUNICATION OF FRM

- 9.1 Improving communication of flood risk management has been raised as a national and local corporate priority for RCT. This was also raised several times by the public as a key theme to improve within our revised LFRMS and Action Plan.
- 9.2 Over half of the responses received from residents state that they are not aware of RCT's dedicated flooding area on its website. Whilst a third of responders state they are aware of the webpage and have visited previously, the majority of respondents were 'neither satisfied nor dissatisfied' with the quality of our webpage. It is clear that the Council's current website and communication tools fall short in providing practical flood risk information for the constituents of RCT.
- 9.3 Some of the key points raised as part of the public engagement exercise regarding how RCT can improve their communication of FRM with the public include;
- Ensure a planned and sustained emergency response by working closely with community groups and their elective Councillors;
 - Build preparedness into communities so that they are able to take responsibility for their own flood risk management, as opposed to being reliant on the Authority and other organisations/agencies to assist. This could include providing practical information on what to do before, during and after a flood and resources/assistance on how to develop a personal flood plan for individuals;
 - Improve community awareness and support using various platforms, not only RCT's webpage and social media;
 - Identified planning control as a concern, particularly relating to new developments and their impact on surface water runoff;
 - Improve partnership working with other RMAs and clearly define the roles and responsibilities of various organisations as well as residents themselves; and
 - Ensure a proactive rather than reactive response to flood risk management.

- 9.4 All points raised as part of the public engagement exercise will be incorporated and enhanced within the objectives, measures and actions detailed within our revised LFRMS and Action Plan.

10. SUSTAINABLE PRINCIPLES IN FRM

- 10.1 The majority of respondents stated that they were not aware of Sustainable Drainage Systems (SuDS) or the Sustainable Drainage Approval Body (SAB) and its functions however, 94% of respondents stated that they would like to see green infrastructure retrofitted into their local area. SuDS and green infrastructure are interchangeable therefore it is noteworthy that a much larger proportion of respondents were aware and in favour of retrofitting green infrastructure but not the SAB and SuDS.
- 10.2 A high majority of residents would like the revised LFRMS to have a greater focus on NFM and to also adopt a catchment-based approach to NFM. Several respondents stated that NFM should be considered in flood risk management at all levels.
- 10.3 The sustainability principles, adaptive resilience and ecosystem services benefit of NFM were raised by respondents as something they feel passionate about and would like to see enhanced within our revised LFRMS and Action Plan. There is a general consensus from the public for NFM to be considered in all flood risk interventions.
- 10.4 The terms 'green', 'natural' and 'sustainable' have been highlighted as key terms to use within our revised LFRMS and Action Plan as they resonate with the public's awareness of climate change. The communication of more technical terms such as SuDS and SAB needs to improve and shared with a wider audience to raise awareness of not only the flood risk benefits but also the wider ecosystem and amenity benefits to communities.

11. RESILIENCE THEMES

- 11.1 Almost all responses received during the public engagement exercise stated that they would like to see more resilience themes within the revised LFRMS and Action Plan. The majority of respondents were also aware of how incorporating resilience themes into the revised LFRMS will build preparedness into communities to be able to respond and adapt to flooding more proactively.
- 11.2 Based on the responses received, there is an appetite from residents to take matters into their own hands when it comes to managing their own

flood risk. This has highlighted the importance of providing services which raise awareness of flood risk, particularly what to do before, during and after a flood event which will be key to the delivery of the National Strategy for FCERM objective for preparedness and building resilience. This will also help to reduce anxiety associated with flooding and ultimately aims to prevent the loss of life.

- 11.3 There is a well-established link between flood risk and mental health. Responses received as part of the public engagement exercise, in addition to the impacts observed following Storm Dennis, have highlighted that not enough is being done to target the detrimental impacts flooding has on the social, emotional and mental well-being of individual and communities. Improved community engagement, access to resources and awareness raising activities can help to improve the social and mental well-being those at risk. This will be enhanced within the revised LFRMS and Action Plan's measures and actions.

12. ASSET MANAGEMENT

- 12.1 The management and maintenance of flood risk assets is key to maintaining the existing standard of protection against flooding. This has been highlighted throughout the public engagement exercise as a key consideration for the revised LFRMS and Action Plan to address.
- 12.2 Asset management and maintenance is acknowledged as a key high-level theme within RCT's 2013 LFRMS, with 11 associated measures inclusive of maintaining an asset register, SuDS adoption, Ordinary Watercourse Consenting and enacting the land drainage byelaws. A number of these measures were longer term measures and are currently progressing, such as the byelaws. Asset management and maintenance related objectives, measures and actions will therefore be enhanced within the revised LFRMS and Action Plan.
- 12.3 70% of respondents as part of the public engagement exercise 'strongly agree' and a further 24% 'agree' that RCT should maintain a record of all structures and features in the borough, as opposed to only the 'significant' assets, as required under Section 21 of the FWMA 2010.
- 12.4 Respondents raised the importance of keeping a register of all assets and ownership details to allow for greater awareness of critical flood risk information and improved response to potential asset failure and subsequent flooding.

13. EQUALITY AND DIVERSITY IMPLICATIONS

- 13.1 An Equality Impact Assessment (EIA) screening form will be prepared prior to the drafting of the LFRMS and the associated statutory consultation.

14. CONSULTATIONS

- 14.1 An initial non-statutory public engagement exercise via a questionnaire was conducted in-house and ran for a period of six weeks from the 13th December 2022 to the 24th January 2023.
- 14.2 Full details on the public engagement exercise results are provided in the 'Initial Public Engagement Report' in Appendix 1. The feedback from the engagement process was insightful and the key points raised and discussed within this report will be incorporated and enhanced upon the objectives, measures and actions set out in our revised LFRMS and Action Plan.
- 14.3 It is a requirement of the Flood and Water Management Act 2010 for the LLFA to consult on the LFRMS and accompanying environmental documents (SEA and HRA) with the public and risk management authorities that may be affected by the strategy. A further opportunity will therefore be provided for the public to consult on the draft LFRMS and Action Plan.

15. FINANCIAL IMPLICATION(S)

- 15.1. The costs associated to the review of the LFRMS and Action Plan, and to facilitate the consultations, is supported by Revenue grant funding provided by the WG.
- 15.2 The measures and actions placed as part of the LFRMS and Flood Action Plan will incur costs over the life cycle of the LFRMS. In developing the LFRMS and Action Plan, the costs and benefits of the measures and actions will be reviewed as part of the drafting process and submitted to Cabinet for approval as part of report for Draft LFRMS, SEA & HRA.

16. LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED

- 16.1 There are legal implications, and the relevant legislation has been considered in Section 4.1.

17. LINKS TO THE COUNCILS CORPORATE PLAN / OTHER CORPORATE PRIORITIES / FUTURE GENERATIONS – SUSTAINABLE DEVELOPMENT

17.1 The development of the LFRMS will identify how the detailed flood risk objectives, measures and actions align with local policies such as the Council’s Corporate Plan “Making a Difference” 2020-2024, the Council’s former LFRMS and FRMP produced in 2013 and 2015, respectively and reflect the sustainable development principles of the Well-being for Future Generations Act and will contribute to all seven national goals.

17.2 The development of the LFRMS will also identify opportunities to align with emerging local policies such as the Council’s revised Local Development Plan and the Council’s Tackling Climate Change Strategy⁴.

18. CONCLUSION

18.1 Since the adoption of our LFRMS in 2013, RCTCBC has been subject to significant rainfall and widespread flooding. This includes the storm events of February 2020, which saw over 1500 properties flooded, damages to critical highway and drainage infrastructure and major disruption to the communities of RCT.

18.2 Following the publication of the Welsh Government’s National Strategy on FCERM in October 2020, triggering the requirement under S10 of the FWMA for the Council as LLFA to review and update its LFRMS, there is now a huge opportunity within this review to set a sustainable strategy to manage flood risk and build resilience and facilitate adaptation for future generations.

18.3 The results from the initial public engagement exercise have been extremely useful in highlighting the key themes and areas for improvement that our revised LFRMS will seek to address. Points raised by respondents also align closely with the objectives set out within the Welsh Government’s National Strategy for FCERM which the revised LFRMS must align with also.

18.4 The key considerations raised by respondents include;

- Improved communication of flood risk, flood risk management, the roles and responsibilities of RMAs and non-RMAs and the support capabilities/resources available to raise awareness and build preparedness within communities and for individuals;

⁴ Think Climate RCT - [Pdf \(browsealoud.com\)](https://www.browsealoud.com)

- Promoting sustainable flood risk management techniques such as SuDS, retrofitting green infrastructure into the urban environment, utilising NFM methods and adopting a catchment-based approach to flood risk management;
- Adaptation and building resilience into both physical assets and the community to help address the risks associated to climate change. Measures and actions include asset maintenance and improvements, installation of property resilience measures, promoting NFM and raising awareness;
- Utilising a risk-based approach to prioritise flood risk management activities and investment to reduce the number of people living in high and medium flood risk areas.

18.5 The key considerations raised as part of the public engagement exercise will be incorporated and enhanced within the objectives, measures and actions detailed within our revised LFRMS and Action.

Other Information: -

Relevant Scrutiny Committee

Contact Officer