



RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

CABINET

15th MAY 2023

**REPORT ON PROGRESS OF 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.**

**AUTHOR(s): Andrew Stone, Head of Flood Risk Management and
Strategic Projects
Catrin Evans, Flood Risk Management Officer**

1. PURPOSE OF THE REPORT

- 1.1 The purpose of this report is to provide members with an update on progress of the Authority's review of the revised Local Flood Risk Management Strategy (LFRMS) 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 will further advise members of the revised programme of work required to deliver the review of the current LFRMS and Action Plan, in accordance with the updated statutory timeframe stipulated by Welsh Government.

2. RECOMMENDATIONS

- 2.1 To note the results and review of the initial public engagement exercise on the revised LFRMS and Action Plan, which was presented to the Climate Change, Frontline Services & Prosperity Scrutiny Committee on 22nd March 2023 as per the programme of work which was agreed by Cabinet on 29th November 2022.
- 2.2 To note the revised indicative timescales, actions and reports being brought to Cabinet and Scrutiny in Appendix 1.



3. REASONS FOR RECOMMENDATIONS

- 3.1 To enable members to consider the results and CCFSP Scrutiny Committee's review of the initial public engagement exercise on the revised LFRMS and Action Plan.
- 3.2 To consider the revised timetable, actions and reports being brought to Cabinet in Appendix 1 following the updated statutory timeframe stipulated by Welsh Government.

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 Lead Local Flood Authority (LLFA) to review its current LFRMS and publish a revised version within 2 years of the National Strategy publication. The original date advised by the Welsh Government (WG) for the publication of the revised LFRMS was October 2023.
- 4.2 It has since been confirmed by the WG however, that the date for publication of the revised LFRMS and Action Plan has been revised from October 2023 to March 2024.
- 4.3 The decision to commence with the review of the LFRMS and Action Plan was agreed by Cabinet Members on 29th November 2022.
- 4.4 Following notification from the WG that the statutory publication date for the revised LFRMS and Action Plan has been revised to March 2024, the LLFA have revised their high-level programme and timeline, from that previously agreed by Cabinet Members on 29th November 2022, to reflect the 6-month delay to the publication date. The revised high-level programme and timeline for the implementation of the review of the LFRMS and Action Plan is included in Appendix 1.
- 4.5 The revised programme and timetable will provide the LLFA with greater capacity to continue its progress on the drafting of the revised LFRMS and Action Plan and accompanying environmental reports (Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment

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



(HRA)), taking into consideration more data, which is constantly being refined and updated.

5. CCFSP REVIEW OF THE INITIAL PUBLIC ENGAGEMENT EXERCISE

- 5.1 As part of the agreed programme of works required to deliver the review of the existing LFRMS and Action Plan, an initial non-statutory public engagement exercise has been undertaken. The results were 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.
- 5.2 The initial public engagement exercise was conducted in-house and ran for a period of six weeks, from 13th December 2022 to 24th January 2023.
- 5.3 The results and feedback provided via the initial public engagement exercise was presented to the CCFSP Scrutiny Committee on 22nd March 2023. This provided Members the opportunity to consider the responses and enable them to help shape and inform the drafting of the revised LFRMS and Action Plan. The CCFSP Scrutiny report and 'Initial Public Engagement Report' can be found on the Council's website²
- 5.4 Key considerations raised by respondents as part of the initial public engagement exercise include:
- Improving the 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 individuals:
 - 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 with climate change. Measures and actions including asset maintenance and improvements, installation of property resilience measures, promoting NFM and raising awareness:

² [Agenda for Climate Change, Frontline Services & Prosperity Scrutiny Committee on Wednesday, 22nd March, 2023, 5.00 pm - Rhondda Cynon Taf County Borough Council \(moderngov.co.uk\)](#)



- 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.
- 5.5 The considerations raised by respondents closely align with the objectives set out within the Welsh Government's National Strategy for FCERM and which the revised LFRMS must also align with.
 - 5.6 Comments received from members of the CCFSP Scrutiny Committee on 22nd March 2023 were positive, with members commenting on the level of detail within the report.
 - 5.7 As the unitary authority with the greatest surface water flood risk in Wales (according to the Communities at Risk Register (CaRR)), the LLFA recognise that managing the risk of flooding is a priority in RCT now and in the future. The results from the CaRR specifically highlighted that RCT has 25 communities within the top 5% in Wales, at highest risk of surface water flooding. This was raised in response to one of the members questions. The LLFA therefore recognise the importance and necessity of having a thorough analysis and detailed report of how considerations raised during the public engagement exercise will be embedded into the revised LFRMS and Action Plan.
 - 5.8 Furthermore, comments were raised by members regarding to what extent the Council were communicating flood risk to the constituents of RCT. This included raising awareness within the community through encouraging the participation of Flood Action groups and providing residents with information on how they can contribute to managing their local flood risk, in addition to the Climate Change agenda. In response, it was advised that each point raised by the members will be embedded within the revised LFRMS and Action Plan.
 - 5.9 Finally, a member questioned the potential of incurring skewed results through the public engagement exercise, as a result of the respondents having varying degrees of interest in flood risk management. In response, it was noted that although the response rate was low considering the number of residents impacted by flooding in recent storm events, the results were still valuable and reinforce many of the themes already contained in the current LFRMS and what the LLFA can enhance within our revised LFRMS and Action Plan.
 - 5.10 Following discussion, members of the CCFSP Scrutiny Committee resolved to acknowledge the contents of the Scrutiny report and for the comments of the Scrutiny Committee to be fed into the revised LFRMS and Action Plan.



6. UPDATE ON PROGRESS TO DATE & REVISED PROGRAMME AND TIMETABLE

- 6.1 As stated in 4.4 above, the WG has revised the statutory publication date for the revised LFRMS and Action Plan to March 2024. The LLFA has used the opportunity to review and revise the high-level programme and timeline, previously agreed by Cabinet Members on 29th November 2022, to reflect the 6-month delay to the publication date. The revised high-level programme and timeline is included in Appendix 1.
- 6.2 As stated in 4.5 above, the revised programme and timetable (Appendix 1) has provided the LLFA with greater time and resource capacity to continue its progress on the drafting of the revised LFRMS and Action Plan and accompanying environmental reports (Strategic Environmental Assessment and Habitat Regulations Assessment). This will enable the LLFA to produce a revised LFRMS and Action Plan taking into consideration refined and updated data.
- 6.3 The key considerations raised by the public (listed in 5.4) and reinforced by members of the CCFSP Scrutiny Committee, are currently being incorporated and enhanced within the objectives, measures and actions detailed within the revised LFRMS and Action Plan.
- 6.4 The LLFA are undertaking an updated and thorough assessment of flood risk across the borough, utilising the best available datasets and tools to determine where in RCT the highest local flood risk areas are located.
- 6.5 The accompanying environmental assessments (i.e., SEA and HRA) are being revised to incorporate the updated environmental strategies, plans, documents and programmes relevant to the requirements of the SEA and HRA.

7. EQUALITY AND DIVERSITY IMPLICATIONS

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



8. CONSULTATIONS

- 8.1 An initial non-statutory public engagement exercise via a questionnaire was conducted in-house and ran for a period of six weeks from 13th December 2022 to 24th January 2023.
- 8.2 Full details on the public engagement exercise results are provided in the 'Initial Public Engagement Report' available on the Council's website².
- 8.3 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 be provided for the public to consult on the draft LFRMS and Action Plan (Appendix 1, item 10).

9. FINANCIAL IMPLICATION(S)

- 9.1. 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.
- 9.2 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 (Appendix 1, item 9).

10. LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED

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

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

- 11.1 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.

- 11.2 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 Strategy³.

12. CONCLUSION

- 12.1 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.
- 12.2 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.
- 12.3 The results from the initial public engagement exercise, in addition to the comments raised by CCFSP Scrutiny Committee on 22nd March 2023, has been valuable and these will be embedded and enhanced with our revised LFRMS and Action.
- 12.4 In response to the notification from the WG that the statutory publication date for the revised LFRMS and Action Plan has been delayed until March 2024, the LLFA have proposed a revision to their high-level programme and timeline for the review of the LFRMS and Action, which was agreed by Cabinet Members on 29th November 2023, to reflect the 6-month delay to the publication date and to allow the LLFA greater capacity to use more data within the revised LFRMS and Action Plan.

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



Appendix 1: Revised High-level Programme & Timeline

ID	Task Name	Description	Timescale	Status
1	Report to SLT/Cabinet - Commencement of the Authority's revised Local Flood Risk Management Strategy (LFRMS) & Action Plan	To advise members of the requirements to produce a revised LFRMS and Action Plan, as required under Section 10 of the Flood and Water Management Act 2010, and to acknowledge the commencement of the revised LFRMS and Action Plan.	Oct – Nov 2022	Completed
2	Initial Public Engagement for the revised LFRMS (non-statutory)	<p>The initial public engagement exercise for the revised LFRMS is intended to understand what key themes the public want the revised LFRMS to focus and improve on.</p> <p>The engagement exercise will also provide the LLFA with an understanding of the public's perception of flood risk in RCT. The consultation period will last 4-6 weeks.</p>	Dec – Jan 2023	Completed
3	Consider initial public engagement exercise responses	The responses received by the public will help inform the drafting of the revised LFRMS and Action Plan.	Jan 2023	Completed
4	Draft LFRMS & Action Plan	The drafting of the revised LFRMS and Action Plan	Jan – Jul 2023	Ongoing
5	Scoping Report for Strategic Environmental Assessment (SEA)	The drafting of the revised SEA	Jan – Jul 2023	Ongoing
6	Habitats Regulations Assessment (HRA)	The drafting of the revised HRA	Jan – Jul 2023	Ongoing
7	Report to Climate Change, Frontline Services & Prosperity Scrutiny Committee	To provide the committee with an overview of the initial public engagement exercise responses and show how they will be included in the Draft LFRMS	Jan – Mar 2023	Completed

8	Report to SLT/Cabinet on progress of the Authority's revised LFRMS & Action Plan	To note the results and CCFSP Scrutiny's review of the initial public engagement exercise and to update members on the revised program of work in accordance with the updated statutory publication date stipulated by Welsh Government.	April – May 2023	Ongoing
9	Report to SLT/Cabinet for Approval for Draft LFRMS, SEA & HRA	To commence formal statutory consultation on the Draft LFRMS and Action Plan, the Strategic Environment Assessment and the Habitats Regulation Assessment.	Jun - Jul 2023	Programmed
10	Statutory Public Consultation on Draft LFRMS, SEA, HRA & EIA	Following approval from Cabinet, the draft LFRMS and Action Plan, along with accompanying documents, will be published for statutory consultation for a period of 6 weeks.	Aug – Sep 2023	Programmed
11	Consider consultation responses	The responses received inform the re-drafting of the revised LFRMS and Action Plan (if required).	Sep - Oct 2023	Programmed
12	Report to Climate Change, Frontline Services & Prosperity Scrutiny Committee	To provide the committee with an overview of the statutory public consultation responses and show how they will be included in the Final LFRMS	Oct – Nov 2023	Programmed
13	Final LFRMS, SEA, HRA & EIA	Complete the final LFRMS and accompanying documents.	Nov – Dec 2023	Programmed
14	Report to Cabinet for Approval for Final LFRMS, SEA, HRA, EIA	To adopt the LFRMS and to submit the LFRMS and accompanying reports to the WG for Ministerial approval.	Dec 2023 – Jan 2024	Programmed
15	Submit Final LFRMS for Welsh Government approval	Submit the LFRMS and accompanying reports to the WG for Ministerial approval.	Jan - Feb 2024	Programmed
16	Publish Final LFRMS	Publish LFRMS onto the Council's website.	Mar 2024	Programmed