

Flood and Water Management Act 2010

Revised Local Flood Risk Management Strategy and Action Plan

Statutory Public Consultation Report

November 2023

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1. INTRODUCTION

- 1.1 This report presents the findings of the statutory public consultation exercise, conducted for a period of six weeks, from 21st of August to the 2nd of October 2023, on the revision of the Local Flood Risk Management Strategy and Action Plan (LFRMS) for Rhondda Cynon Taf County Borough Council (RCTCBC), as required under Section 10 of the Flood and Water Management Act (FWMA) 2010.
- 1.2 Section 2 outlines the background to the purpose of the statutory public consultation exercise.
- 1.3 Section 3 details the methodology used in conducting and analysing the survey.
- 1.4 Section 4 provides an overview of the structure of the public consultation carried out via a Snap XMP survey on the RCT Consultation page.
- 1.5 Section 5 provides the results from the public consultation carried out via a Snap XMP survey on the RCT Consultation page.
- 1.6 Section 6 provides the responses to the public consultation which were received separately to the Snap XMP survey. These responses were received from internal departments within the Authority in addition to external consultees.
- 1.7 Section 7 concludes this public consultation report.

2. BACKGROUND

2.1 Under the FWMA 2010, the Council was given the additional responsibility of dealing with flooding from local sources (ordinary watercourses, surface water and groundwater) as the Lead Local Flood Authority (LLFA).

2.2 Under Section 10 of the Act, RCTCBC must “develop, maintain, apply and monitor a strategy for local flood risk management”. RCTCBC must:

- ensure the strategy is consistent with the National Strategy
- consult other risk management authorities and the public on the LFRMS
- publish a summary of its LFRMS
- consider issuing guidance about the application of the LFRMS
- submit a draft of the LFRMS to the Welsh Ministers for review

Welsh Government (WG) may approve with or without modification or reject it.

2.3 The second iteration of the National Strategy for Flood and Coastal Erosion (FCERM) in Wales was published in October 2020¹. This 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 the timeframe stipulated by the Welsh Government (WG). The original date advised by the WG for the publication of the revised LFRMS was October 2023.

2.4 The WG have confirmed that the date for publication of the revised LFRMS and Action Plan has been revised from October 2023 to March 2024.

2.5 The revised LFRMS must be consistent with the objectives outlined within the updated National Strategy. The 5 core objectives are:

1. Improving our understanding and communication of risk
2. Preparedness and building resilience
3. Prioritising investment in the most at risk communities
4. Preventing more people becoming exposed to risk
5. Providing an effective and sustained response to events

2.6 RCTCBC published their initial LFRMS in January 2013² in accordance with Section 10 of the FWMA 2010. The LFRMS defines who the Risk Management Authorities (RMA) are, what their function is and what their responsibilities are.

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

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

The strategy further identifies the Local Objectives and Measures being implemented for the short, medium and long term to manage flood risk from local sources (ordinary watercourses, surface water and groundwater) within the authority.

- 2.7 RCTCBC is also required to produce a Flood Risk Management Plan (FRMP), under the 2009 Flood Risk Regulations. RCTCBC published their FRMP in November 2015³ in accordance with Flood Risk Regulations 2009. The FRMP developed the objectives and high-level actions outlined in our 2013 LFRMS into a detailed plan for managing local flood risk in our communities.
- 2.8 Whilst the Council previously published the LFRMS and FRMP separately, the revised LFRMS integrates the two documents into one. This reduces complexity and enable the LLFA to communicate and manage local flood risk more effectively. The FRMP is referred to as the Flood Action Plan within the revised LFRMS.
- 2.9 An initial non-statutory “public engagement” exercise via a questionnaire was published prior to the drafting of the revised LFRMS. This ran from 13th December 2022 to 24th January 2023. The purpose of the initial public engagement exercise was to identify what key themes, the constituents of RCT want the revised LFRMS to focus and improve on. A total of 57 responses were received and the results and feedback were used to inform changes to the revised LFRMS and Action Plan. The ‘Initial Public Engagement Report’ is available on the Council’s website⁴.
- 2.10 As required under the FWMA, the LLFA must consult on the draft LFRMS and Action Plan and the accompanying environmental reports (Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA)) with the public and risk management authorities that may be affected by the strategy.
- 2.11 The aim of the statutory public consultation was to seek support for the draft revised LFRMS and Action Plan and accompanying environmental assessments.

³ [Flood Risk Management Plan, November 2015](#)

⁴ [Agenda for Climate Change, Frontline Services & Prosperity Scrutiny Committee on Wednesday, 22nd March, 2023, 5.00 pm - Rhondda Cynon Taf County Borough Council \(moderngov.co.uk\)](#)

3. METHODOLOGY

- 3.1 The statutory public consultation on the draft LFRMS and Action Plan, and accompanying environmental reports (SEA and HRA), was conducted in-house and ran for a period of six weeks (the minimum statutory requirement), from the 21st of August to 2nd October 2023.
- 3.2 A Snap XMP survey was launched and uploaded onto the Council's 'Current Consultations' webpage. The survey aimed to gain public support and feedback on the draft LFRMS and Action Plan, and the accompanying environmental reports (SEA and HRA).
- 3.3 Details of the survey were also published on the Council's 'Flood Alleviation' webpage, which detailed further information relating to the LFRMS, including legislative requirements and details of RCTCBC's current LFRMS (published in January 2013).
- 3.4 Details of the survey were also published via a press release on the Council's consultation webpage to promote the consultation and encourage participation.
- 3.5 Social media outlets including Twitter and Facebook were utilised in order to communicate with the public and encourage engagement and feedback regarding the Strategy. Social media posts were published one week prior to the consultation start date to initiate early engagement (14th August 2023), and then once a week for a period of six weeks.
- 3.6 A poster publicising the public consultation on the draft LFRMS and Action Plan via a QR code which directed users to the online Snap XMP survey was designed and distributed to all 13 Council Leisure Centres and 14 Council Libraries to promote the consultation and encourage participation. The bilingual A3 poster is presented in Appendix A.
- 3.7 An email was sent to a range of consultees, statutory and non-statutory, internal and external, to promote the consultation and encourage participation. The consultees included all employees of RCTCBC, relevant Risk Management Authorities, local Town & Community Councils, Councillors and Cabinet Members. A full list of consultees is included in Appendix B.
- 3.8 Details of the consultation and survey was also included in the weekly newsletter issued to all Councillors and Cabinet Members on 18th August 2023.

3.9 As with previous year's "digital by default approach" we continued to consider those having reduced or no access to the internet and those who prefer to engage through traditional methods. These methods include;

- A telephone consultation option was in place for all Council constituents, through the Council's contact centre. This option allows people to discuss their views or request consultation materials.
- Individual call backs were available on request.
- A consultation Freepost address was available for postal responses.

4. PUBLIC CONSULTATION SURVEY STRUCTURE

- 4.1 The following section outlines the structure of the Snap XMP survey which was published onto the Council's 'Current Consultations' webpage as part of the public consultation on the draft LFRMS and Action Plan and accompanying environmental assessments (SEA & HRA).
- 4.2 The public consultation contained specific questions relating to the various sections of the draft LFRMS and Action Plan (Part 1), SEA Environmental Report (Part 2) and HRA Appropriate Assessment (Part 3).
- 4.3 Part 1 consists of 9 questions; Part 2 consists of 7 questions and Part 3 consists of 5 questions.
- 4.4 Section 5 of this report introduces the results of the statutory public consultation via the Snap XMP Survey and is structured accordingly to the questions contained in the survey. Where respondents have made significant comments outside of the structure of the questionnaire, these have been dealt with accordingly.
- 4.5 Section 6 of this report details the results of the statutory public consultation received separately to the Snap XMP Survey via direct email response.

5. PUBLIC CONSULTATION RESULTS: SURVEY

- 4.6 A total of 20 responses were received during the statutory public consultation period; 15 of which responded via the Snap XMP Survey on the Council’s ‘Current Consultations’ webpage and 5 responses were received separately to the survey via direct email to officers.
- 4.7 Whilst only 15 respondents completed the Snap XMP Survey, the relevant ‘Current Consultations’ webpage received 989 views from 649 individual users. The high volume of traffic to the webpage is noteworthy and can be considered as indirect support to the draft LFRMS and Action Plan.
- 4.8 This section of the report details the responses received via the Snap XMP Survey, of which 15 were received.

PART 1: THE DRAFT LFRMS & ACTION PLAN

- 4.9 64% of respondents responded to the consultation as a resident of RCT, 29% responded as a member of RCTCBC staff, 7% responded in their role as a Councillor and 7% responded as ‘Other’ which was specified as ‘Neighbouring Local Authority’. Note, respondents were asked to choose all options that apply.
- 4.10 When asked **do you agree with the methodology for assessing flood risk in RCT?**, 93% of respondents stated they agree and 7% stated they disagree. One comment was received in response to the question which is shown in the table below along with the LLFA’s response.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
<p><i>“Who takes responsibility when surface water starts on NRW land then hits LLFA roads?”</i></p> <p><i>“Are house owners whose garden wall is on the riverwall, responsible for maintenance and keeping it safe? Also, large landowners, are they regularly checked that they are</i></p>	<p>Surface water flood risk falls under the remit of the LLFA to manage (as per the Flood and Water Management Act 2010), however it is the landowner’s responsibility to manage surface water runoff from their land (as stated under common law).</p>	<p>✘</p>

<i>maintaining sinks and culverts on their land”</i>	<p>The Highway Authority is responsible for managing surface water on the highway (not trunk roads or motorways).</p> <p>NB: There are no ‘LLFA roads’. The LLFA is the relevant risk management authority for managing local flood risk.</p>	
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4.11 When asked ‘**does the Local Strategy appropriately consider the potential impacts of climate change on the risk of flooding in RCT?**’, 92% of respondents stated they agree and 8% stated they disagree.

4.12 When asked ‘**does the draft Local Strategy clarify roles and responsibilities in relation to flood risk management in RCT?**’, 79% of respondents stated they agree and 21% stated they disagree. Two comments were received in response to the questions which are shown in the table below along with the LLFA’s response.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
<i>“Are house owners whose garden wall is on the riverwall, responsible for maintenance and keeping it safe? Also, large landowners, are they regularly checked that they are maintaining sinks and culverts on their land”</i>	<p>These landowners are known as riparian landowners and under common law, riparian landowners have certain rights and responsibilities for the maintenance of land up to the centreline of any watercourse adjacent to their property. This includes the maintenance of the bed, banks and any boundary features, i.e., retaining walls.</p> <p>It is the landowner’s responsibility to ensure the maintenance of sinks and culverts on their land. Measures are included in the Strategy for enforcement if applicable and required.</p>	X
<i>“Not clear enough and should not all be “initialised””</i>	79% of the responses received agree that the draft Local Strategy clarifies roles and responsibilities in	X

	<p>relation to flood risk management in RCT.</p> <p>The Authority has no control over legislation and endeavours to remain consistent with other published documents including the National Strategy for Flood and Coastal Erosion Risk Management, published by the Welsh Government.</p>	
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4.13 When asked ‘**do you agree with the strategic objectives of the draft Local Strategy?**’, 93% of respondents stated they agree and 7% of respondents stated they disagree.

4.14 When asked ‘**are the strategic objectives supported by the appropriate flood measures?**’, 79% of respondents stated they agree and 21% of respondents stated they disagree. Three comments were received in response to the questions which are shown in the table below along with the LLFA’s response.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
<p><i>“Rhydyfelin, despite having many flood risks has been abandoned. Only “Preparedness” has been proposed, which is basically telling us “You’re on your own”. The main cause of flooding is blocked culverts, meaning there is scope for physical improvement.”</i></p>	<p>Two Section 19 reports covering the Rhydyfelin area have been published by the Authority; one covering the flooding during Storm Dennis in February 2020, and a further report covering the incident in October 2021. Both reports are available on the Council’s website and detail the works completed and proposed by the relevant Risk Management Authorities to manage the flood risk in Rhydyfelin.</p> <p>In addition to the works completed by the LLFA to manage local flood risk in Rhydyfelin following both storm events, a further two actions for Rhydyfelin community have been included in the draft Flood Action Plan (ref SFRA9 A7</p>	<p>×</p>

	and SFRA9 A8) to be completed in the short and medium term.	
<i>“No mention at all of Ynysybwl which has deemed as a high-risk area with danger to life. There are currently no flood defences or an action plan in place to support residents of future flooding events.”</i>	Three actions have been proposed for Ynysybwl within the draft Flood Action Plan (ref SFRA8 A1 – A3) to manage local flood risk in addition to co-operating with Natural Resources Wales as the relevant Risk Management Authority responsible for managing main river flood risk which this comment refers to.	✘
<i>“I agree appropriate flood measures are provided, but in relation to Measure 2 - SUDS does not include driveways and the planning restrictions which apply there. These require greater publicity and also enforcement. Also Measure 6 - Community Adaptation and Resilience - states; “This may include the preparation of community flood plans and outreach work with residents, businesses, and schools to raise awareness and preparedness.” This should not be ‘may’ it should be ‘will’ as you have decided you are going to be doing these things already.”</i>	<p>Schedule 3 of the Flood and Water Management Act 2010 stipulates the minimum application requirement for SuDS Approval Body (SAB) prior to construction, i.e., any development that is more than one dwelling or where the area of land covered by construction work is 100 square metres or more. Schedule 3 is wholly independent of the Local Planning Authority requirements and an applicant would require both planning and SAB consents prior to any construction works.</p> <p>Several measures and supporting actions regarding communication and enforcement have been included in the draft Strategy and Action Plan.</p> <p><u>Proposed Amendment</u> The term ‘may’ in Measure 6 – Community Adaptation and Resilience’ will be removed.</p>	✓

4.15 When asked ‘**are the flood measures supported by appropriate flood actions in the Flood Action Plan?**’, 79% of respondents stated they agree and 21% of respondents stated they disagree. Two comments were received in response to the questions which are shown in the table below along with the LLFA’s response.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
<p><i>“Rhydyfelin has been written off.”</i></p>	<p>Disagree - Two Section 19 reports covering the Rhydyfelin area have been published by the Authority; one covering the flooding during Storm Dennis in February 2020, and a further report covering the incident in October 2021. Both reports are available on the Council’s website and detail the works completed and proposed by the relevant Risk Management Authorities to manage the flood risk in Rhydyfelin.</p> <p>In addition to the works completed by the LLFA to manage local flood risk in Rhydyfelin following both storm events, a further two actions for Rhydyfelin community have been included in the draft Flood Action Plan (ref SFRA9 A7 and SFRA9 A8) to be completed in the short and medium term.</p>	<p>X</p>
<p><i>“This is no longer as detailed as the 2015 version. Some measures have been lost, eg FRMP 24 -Construction of Flood Defences for Hawthorn - this is now subsumed under a broader heading, so it is more difficult to see what is planned where. Therefore, this document is not as transparent as it once was.”</i></p>	<p>Disagree – The Flood Action Plan, which replaces the former Flood Risk Management Plan (FRMP) published in 2015, has been integrated into the Local Strategy to reduce complexity and to enable the Authority to reflect consistent delivery against the objectives and measures within the Local Strategy.</p>	<p>X</p>

4.16 When asked ‘**do you agree with the arrangements for measuring and monitoring progress of the Local Strategy?**’, 93% of respondents stated they agree and 7% of respondents stated they disagree.

4.17 7 responses were received when asked ‘**do you have any additional comments to make in relation to the draft Local Strategy?**’. These comments, along the LLFA’s response, are shown in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
<p><i>"I have a so called unadopted road at the back of my house with all the kerbs collapsed this causes excessive amounts of water to come down into my garden and other gardens in the street and it's getting worse during heavy rain wondered if anything could be done about this it's a single access road to grand View Williamstown affecting Cornwall road Williamstown Rhondda, thanks."</i></p>	<p>N/A – This response is not related to the consultation on the draft Local Strategy. The query has been passed onto the relevant Council department for actioning.</p>	<p>✗</p>
<p><i>"It lacks firm details and is unambitious."</i></p>	<p>Disagree – The draft Local Strategy follows the official template prepared by the Welsh Local Government Association (WLGA), developed in partnership with wider Local Authorities. This Local Strategy build upon the previous Local Strategy and FRMP to provide strategic objectives to manage local flood risk in RCT through the delivery of flood measures and actions.</p>	<p>✗</p>
<p><i>"Tree'd areas need to be swept more frequently in autumn months."</i></p>	<p>The Authority is not responsible for all woodland in RCT. Partner organisations including NRW as land estate managers of the Welsh Government Woodland Estate have prepared Forest Resource Plans which can be viewed here - Natural Resources Wales / Forest Resource Plans</p> <p>Objective 11 and Measures 7 and 16 of the draft Local Strategy details how the Authority will cooperate and coordinate its Strategy with other plans and policies being developed by Welsh RMAs, including NRW's production of Forest Resource Plans.</p>	<p>✗</p>
<p><i>"Well written and clear. Typos - page97 'Other possible sources</i></p>	<p>Agreed</p>	<p>✓</p>

<i>of ... funding or flooding?' Page 96, delver or deliver? Page 34 - bookmark error"</i>	<u>Proposed Amendment</u> Typos have been noted and will be amended.	
<i>"The document makes no reference to any policies in dealing with increased run-off from contaminated stockpiles into the watercourses."</i>	<p>Policies to deal with increased run-off from contaminated stockpiles and into watercourse falls outside of the scope of the LFRMS and Action Plan.</p> <p>Specific policies relating to water pollution, specifically associated to determining development proposals and their potential impact on water quality, are included in the Authority's Local Development Plan, whereby the Local Planning Authority would be required to consult with Public Health & Protection and guided by their advice in term of potential concerns and need for conditions.</p> <p>In terms of potential water quality impact on main rivers, Natural Resources Wales is the relevant statutory consultee.</p>	X
<i>"Policies in place to quickly assist anyone who faces issues following a flood."</i>	There are several measures and actions included in the draft Local Strategy which contribute to the delivery of Objective 10 'Improve individual and communities' ability to prepare, response and recover to the impacts of flooding'. These include Measures 3-9, which will be delivered through Actions A6-A14 and A29.	X
<i>"The Strategy document is very comprehensive, although perhaps too long in places to be easily accessible to non-specialists. It could benefit from an increase in illustrations and pictures to help improve the overall style and feel of the document. There does not seem to be much in the way of reflection on what has been achieved within the previous</i>	In terms of reflecting 'what has been achieved within the previous strategy period', there is an existing reporting system in place under Section 18 of the FWMA 2010, for LLFA to report progress against the measures contained in the National Strategy for Flood and Coastal Erosion Risk Management (National Strategy), as well as wider flood and coastal erosion risk management (FCERM) matters and best practice in Wales. Progress is reported to NRW	✓

<p><i>strategy period or what has not been achieved and reasons why this is the case.”</i></p>	<p>who have responsibility for preparing the Section 18 report for Welsh Ministers on FCERM in Wales.</p> <p><u>Proposed Amendment</u> Illustrations will be included in the final Local Strategy to improve the communication of technical information in addition to the ‘Summary’ document.</p>	
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PART 2: THE STRATEGIC ENVIRONMENTAL ASSESSMENT – ENVIRONMENTAL REPORT

4.18 Six responses were received when asked ‘are there any other key issues or trends that you think should be considered in the SEA?’. The comments, along with the LLFA’s response are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
“Areas, maintenance of storm drains.”	<p>The ownership and maintenance of surface water drainage features such as ‘storm drains’ is fragmented across a range of both public and private parties, including local authorities, highway authorities, water companies and private individuals and businesses. The roles and responsibilities of various parties for managing flood risk is detailed in Section 5 of the draft LFRMS and Action Plan.</p> <p>Several measures are outlined in the draft LFRMS and Action Plan to encourage and regulate the maintenance of public and private drainage assets. This in turn will have a positive environmental impact by reducing the risk of flooding, provide climate resilience to communities and enhance public health and well-being.</p> <p><u>Proposed Amendment</u> Asset maintenance and its environmental impact will be considered in the revised SEA.</p>	✓
“No”	No response required	✗
“N/A”	No response required	✗
“See 9”	See comment made above	✗
“N/A”	No response required	✗
“None”	No response required	✗

4.19 Six responses were received when asked ‘**are there additional environmental effects (including those on humans) that need to be taken into account when developing the Local Strategy?**’. The comments, along with the LLFA’s response are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
“No”	No response required	X
“Access to green space should be prioritised and utilized as a form of flood management.”	<p>Agree - The LFRMS and Action Plan’s strengthening and focus on the use of Natural Flood Management (NFM) and green infrastructure in flood risk management interventions is not only beneficial to reducing flood risk, but also provides additional environmental benefits which are referred to within the draft LFRMS and SEA.</p> <p><u>Proposed Amendment</u> Greater reference to green infrastructure and NFM will be strengthened throughout the SEA to reflect its promotion throughout the Strategy.</p>	✓
“The removal of local forestry”	<p>Agree – Forestry practices, including the removal of woodland, can have an impact on the environment in multiple ways, including flooding, water resources and quality and soil management.</p> <p><u>Proposed Amendment</u> The role and impact of woodland and forestry practices will be strengthened accordingly throughout the SEA.</p>	✓
“Winning the hearts and minds, getting residents interested – getting them to start to complete their individual plans”	It is already noted in Section 7 of the SEA that Objective 9 (<i>Develop effective communication tools to share information and improve individual and community awareness of local flood risks and how they can be managed proactively</i>) of the draft LFRMS and Action Plan will significantly contribute to the achievement of SEA Objective 2: Provide opportunities to	X

	improve human health and avoid adverse effect on population.	
<i>“Outreach centres for communities badly affected by floods that have to be moved. Ensuring that the elderly or vulnerable are kept advised of what’s happening. Not all have access to technology. Perhaps a register should be maintained of properties within flood plains.”</i>	Several objectives and measures of the draft LFRMS and Action promote greater communication, awareness raising and improved prioritisation of flood risk management to the most vulnerable communities which are considered to have significant beneficial effects on reducing inequalities and social deprivation within communities at risk. Informed communities that understand and are prepared for flood events will develop resilience and be better equipped to respond to events, reduce stress and anxiety and improve well-being.	X
<i>“None”</i>	No response required	X

4.20 Four responses were received when asked ‘**is there any additional mitigation for adverse effects or enhancement opportunities that should be incorporated into the Local Strategy?**’. The comments, along with the LLFA’s response are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
<i>“No”</i>	No response required	X
<i>“Green Spaces and tree planting should be encouraged and enhanced throughout RCT”</i>	<p>Agree - The LFRMS and Action Plan’s strengthening and focus on the use of Natural Flood Management (NFM) including tree planting and green infrastructure in flood risk management interventions is not only beneficial to reducing flood risk, but also provides additional environmental benefits which are referred to within the draft LFRMS and SEA.</p> <p><u>Proposed Amendment</u> Greater reference to green infrastructure and NFM will be strengthened throughout the SEA to reflect its promotion throughout the Strategy.</p>	✓
<i>“Make it clearer that you intend to track down all Riparian owners”</i>	This response is not related to the consultation question regarding the SEA.	X

	A riparian landowner is the owner of land that is next to a watercourse or has a watercourse running through or beneath it. It would not be feasible to identify and ‘track down’ all riparian landowners however there are measures and actions in place within the draft LFRMS and Action Plan to improve the awareness of riparian owners’ roles and responsibilities to maintain their assets to reduce the risk of flooding.	
“None”	No response required	×

4.21 Five responses were received when asked ‘**are there key environmental indicators that should be incorporated into annual reporting on the Local Strategy?**’. The comments, along with the LLFA’s response are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
“No”	No response required	×
“Resources used including funding, space used and green spaces created”	The revised LDP will be reporting in more detail on green spaces and green infrastructure via Annual Monitoring Reports, once it is adopted. Funding is already identified in the draft LFRMS and Action Plan Strategy and will be monitored, reviewed and updated in accordance with Section 11 of the draft LFRMS and Action Plan (<i>Monitoring Progress</i>).	×
“N/A”	No response required	×
“Maintenance of SSI (sites of special scientific area) and the “wellbeing” of insect reptile or flora in such areas”	The responsibility for assessing and monitoring the condition of a SSSI in Wales lies with the appropriate statutory conservation agency, i.e., NRW.	×
“None”	No response required	×

4.22 Four responses were received when asked ‘**are there any relevant plans and programmes that have not been included in this assessment?**’. The comments, along with the LLFA’s responses are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
"No"	No response required	×
"Ynysybwj"	N/A – This response is not related to the consultation question regarding the SEA.	×
"n/a"	No response required	×
"None"	No response required	×

4.23 Three responses were received when asked '**is there any information you feel should be added to the baseline assessment?**'. The comments, along with the LLFA's responses are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
"No"	No response required	×
"n/a"	No response required	×
"None"	No response required	×

4.24 Three responses were received when asked '**please tell us if you have any overall views or comments on the SEA that have not been covered by previous questions.**'. The comments, along with the LLFA's responses are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
"none"	No response required	×
"n/a"	No response required	×
"None"	No response required	×

PART 3: THE HABITATS REGULATION ASSESSMENT – APPROPRIATE ASSESSMENT

4.25 Four responses were received when asked ‘**what are your views on the European Designated Sites screening process?**’. The comments, along with the LLFA’s responses are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
“none”	No response required	✗
“n/a”	No response required	✗
“detailed but appears to deal with major waterways, and not small tributaries that run into named rivers”	The LLFA has no control over what sites are designated European Sites. All European Sites in Wales are designated by the Welsh Government. European Sites are designated under the Habitats Directive and Birds Directive.	✗
“None”	No response required	✗

4.26 Three responses were received when asked ‘**what are your views on the screening of Local Strategy objectives and measures?**’. The comments, along with the LLFA’s responses are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
“good”	No response required	✗
“n/a”	No response required	✗
“Comprehensively covered”	No response required	✗

4.27 Three responses were received when asked ‘**what are your views on the in-combination assessment of Plans, Policies and Programmes?**’. The comments, along with the LLFA’s responses are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
“good”	No response required	✗
“n/a”	No response required	✗
“Comprehensively covered”	No response required	✗

4.28 Three responses were received when asked ‘**do you think there are adequate mitigation measures in place to ensure no adverse effect on European Designated Sites?**’. The comments, along with the LLFA’s responses are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
“yes”	No response required	X
“n/a”	No response required	X
“Yes”	No response required	X

4.29 Three responses were received when asked ‘**please tell us if you have any overall views or comments on the HRA that have not been covered by the previous questions.**’ The comments, along with the LLFA’s responses are included in the table below.

Public Response	RCTCBC (LLFA) Response	Proposed Amendment
“none”	No response required	X
“n/a”	No response required	X
“No further comment”	No response required	X

6. PUBLIC CONSULTATION RESULTS: DIRECT RESPONSES

- 6.1. Of the 20 responses received as part of the statutory public consultation on the draft LFRMS and Action Plan, 5 responses were received separately to the Snap XMP survey, i.e., these responses were received directly to officers within the Council's Flood Risk Management department.
- 6.2. Of the 5 responses, 3 were received from internal departments within the Authority (Planning Policy, Countryside and Infrastructure Asset Management) and 2 were received from external consultees including a Member of the Senedd and a Risk Management Authority (LLFA).
- 6.3. The primary responses raised by each consultee have been included in the Table below, along with the LLFA's response. It is worth noting that the responses received to the public consultation were minor and overall, responses were positive, largely demonstrating support for the draft LFRMS and Action Plan.

Consultee	Key Response	RCTCBC (LLFA) Response	Proposed Amendment
Planning Policy	<i>“This Local Strategy should reference ‘Future Wales: The National Plan 2040’ (2021)’ or specific policy 8 wherever you feel appropriate.”</i>	Agreed Proposed Amendment The draft LFRMS and Action Plan will be updated accordingly to reflect this piece of national legislation/policy.	✓
	<i>“The ‘Link to Other Council Plans’ column should include ‘RCT’s Local Development Plan’ for measures 14, 15 and 31.”</i>	Agreed Proposed Amendment RCT’s Local Development Plan will be referenced appropriately for Measures 14, 15 and 31.	✓
	<i>“There is only one reference to the SFCA in the document – just checking that there is no need for further reference to it?”</i>	Disagree – the SFCA is a strategic planning tool and therefore is only relevant to Measure 1 (Consultee to the Local Planning Authority) of the Strategy.	✗
Countryside	<i>“The Plan is very helpful in drawing together Strategy and Action in the same place”</i>	Agree - No response required	✗
	<i>“SINC are affected by flood risk: The area seems low and I wonder if it is worth checking.”</i>	Agreed Proposed Amendment The SINC area (Ha) at high/medium/low flood risk (stipulated in Section 3) has been updated following a review of the most up-to-date datasets to reflect a more accurate depiction of SINC coverage at risk of local flooding.	✓
	<i>“There is nothing in the Plan about tips. I appreciate the new tips regulatory work will postdate the legislation etc relating to flood risk but given the impacts of Storm Dennis, both locally and on the new tips regime, is it something the plan should at least refer to?”</i>	The draft LFRMS and Action Plan will not be referring to tips as this is a focussed item and by managing local sources of flooding, it will influence the requirement of managing tips appropriately.	✗

	<p><i>“P46 (41) Action for Nature is prepared by the Local Nature Partnership not the Council. The plan has been reported to members and will be part of the evidence base for the review Local Development Plan.”</i></p>	<p>Agreed</p> <p><u>Proposed Amendment</u> The draft LFRMS and Action Plan will be updated accordingly to reflect this.</p>	✓
	<p><i>“P97 (92) Monitoring wider benefits, habitat and biodiversity is mentioned but no detail given, maybe FAS should establish likely habitat and biodiversity impacts, minimise adverse and maximise benefits?”</i></p>	<p>Measures are broad activities and ways of working to meet the strategic objectives. Actions in the Flood Action Plan are specific tasks / activities / initiatives identified to deliver the measures.</p> <p>Action A16 in the Flood Action Plan refers to the identification of wider environmental benefits to be established as a standard set of investment objectives for FAS business case development to maximise environmental benefits. This action is intended to deliver against Measure 31 (<i>Monitoring the Delivery of Wider Benefits</i>).</p>	✗
Infrastructure Asset Management	<p><i>“P49 - Highway - except for Trunk Roads and Motorways”</i></p>	<p>Agreed</p> <p><u>Proposed Amendment</u> The role of the Highway Authority in managing flooding on or coming from the highway in Section 5 will explicitly state <i>“except for Trunk Roads and Motorways”</i> to ensure clarity between the role of the Highway Authority and Trunk Road Agency as Risk Management Authorities.</p>	✓
	<p><i>“P79 - Who is the Pluvial Drainage team – Depot team or within FRM?”</i></p>	<p>The ‘Pluvial Drainage team’ was established by the Council’s Highway and Streetcare department.</p>	✓

		<p><u>Proposed Amendment</u> This will be clarified within the measure description.</p>	
	<p><i>“P80 - RCT operates several different asset management systems, e.g., Structures database, Corporate Estates database – by ‘single’ database do you mean the Drainage/FRM database?”</i></p>	<p>Measure 18 of the LFRMS refers to the Authority’s single flood risk asset management system which is operated by RCTCBC in its role as the LLFA and is a duty under Section 21 of the FWMA.</p> <p><u>Proposed Amendment</u> This will be clarified within the measure description.</p>	✓
	<p><i>“P80 - Asset Management Plan – how do you intend to liaise with others on this – e.g., Corporate Estates / Tip Safety team / Structures team?”</i></p>	<p>Measures are broad activities and ways of working to meet the strategic objectives. Actions in the Flood Action Plan are specific tasks / activities / initiatives identified to deliver the measures.</p> <p>Specific details regarding the delivery of Measure 18 (Catchment Asset Management Plans) are included in the Flood Action Plan, specifically Actions A20 and A22.</p>	✗
	<p><i>“Action Plan A20 and A21 – is there liaison ongoing with the Highway Infrastructure team with respect to the asset reporting?”</i></p>	<p>There is ongoing liaison between the LLFA and the Highway Authority with the Infrastructure Management team in respect of asset reporting.</p> <p><u>Proposed Amendment</u> This will be clarified in Table 1 of the Flood Action Plan.</p>	✓
	<p><i>“Within the SFRA’s, first described on Page 16 of Appendix A there is general phrasing that the watercourses are generally at the headwaters have remained in a ‘natural’ condition, the watercourses have been heavily modified and culverted</i></p>	<p>Agreed</p> <p><u>Proposed Amendment</u> Reference to modifications to the watercourses on the hillsides in relation to industrial legacy such as spoil and forestry activities will be clarified within the Flood Action Plan, particularly in those</p>	✓

	<i>beneath the urban development on the valley floor. I would contend that this is not the case and in some instances the watercourses have been modified on the hillsides, particularly in relation to the industrial legacy such as spoil tips and in later decades for forestry activities.”</i>	Strategic Flood Risk Areas with significant tip extents.	
Member of the Senedd	<i>“Points 9 and 10 of your strategic objectives are, in my view, vital to any ongoing work on flooding and one we need to do more to prioritise”</i>	Agree – no response required	✘
	<i>Measure 6 Community Adaptation and Resilience “should be strengthen. The use of the works “this may” is not a firm enough commitment in my view. The assertion that this is currently good practice that is recurring and already costed is not evidenced here, nor, I would argue, on a community level (yet). The goals outlined here are not in themselves an adequate approach to the aim of fostering community resilience and preparedness. Likewise in the section under Measure 8 Public Engagement & Consultation Raising community awareness, it would be good to see an outline of how this will be done, by whom and when. There is potential to combine the work needed to achieve measures 6 and 8 in an effective manner but there aren’t enough details here to sense the vision for achieving this.”</i>	<p>It is important to note that measures are broad activities and ways of working to meet the strategic objectives. Actions in the Flood Action Plan are specific tasks / activities / initiatives identified to deliver the measures. These actions have clearly defined outputs / outcomes and include indicative timescale for delivery and costs. The flood measures are high-level and will therefore not include specific details outlining how, by whom and when they will be achieved.</p> <p>In addition, Measures 6 and 8 are recurring from the existing LFRMS⁵ (reference to Measures 5-8). This revised LFRMS and Action Plan aims to refine the existing measures and enhance delivery against via actions including A6-A14 and A29. Action A6 and A7, which refer to the development of an effective communication strategy and associated plans, will particularly aid in achieving Measures 6 and</p>	✓

⁵ [Local Flood Risk Management Strategy, 2013](#)

		<p>8 by fostering understanding, raising awareness and building resilience into the community to prepare and manage the impacts of flooding.</p> <p>The Flood Action Plan will be reviewed and updated on a regular basis, reporting on progress every 2 years to ensure continued delivery and incorporate lessons learnt.</p> <p><u>Proposed Amendment</u> The term ‘may’ in Measure 6 – Community Adaptation and Resilience’ has been removed.</p>	
	<p><i>“I regard both these goals (Measure 6 and 8) as evidence of the need for Community Flood Action Groups to be established as soon as possible. It will not be enough to have information available on websites and assume that information has been disseminated. CFAGs will be able to look at, dissect and respond for their communities regarding any information that is available. CFAGs will be able to ensure that all local residents and interested parties are aware of plans and will be able to collate responses and discuss with the LLFA any enhancements to their Flood Action Plans. Flood Action Groups would also be able to help their own community come to terms with the aftermath of any flooding events by having a central role in an aftermath support network, that would have</i></p>	<p>Measures 6 and 8 emphasises the need for Community Flood Plans and outreach work with residents, businesses and schools to raise awareness and preparedness of flooding. These measures are also supported by Measures 3-5 of the draft LFRMS, in addition to actions including A6-A14 and A29.</p> <p>It is important to note that Community Flood Plans / Community Flood Action Groups are led by the community themselves and the measures and actions outlined in the draft LFRMS and Action Plan aim to provide the community with the tools, information and support to ensure their success and sustainability.</p>	<p style="text-align: center;">X</p>

	<i>prepared and worked together prior to any event, and would thus help to alleviate the stress and anxiety referred to in Section 10.”</i>		
	<i>“I notice from your Flood Action Plan that Rhydyfelin is the only area piloting any community engagement looking at Personal Flood Action Plans. Again, I have to stress that the formation of a Community Flood Action Group would better compliment this work and strengthen the safety measures should the worst happen.”</i>	In addition to Action SFRA9 A7 which refers to the establishment and delivery of pilot Personal Flood Plan for the community of Rhydyfelin, there Action Plan also refers to SFRA9 A8 which refers to the establishment and delivery of a pilot Community Flood Plan for the community of Rhydyfelin. The outputs of both actions will feed into a review of the effectiveness of such methods to improve individual and community preparedness to the risk of flooding which could lead to wider delivery across RCT, on a risk-based approach.	×
Risk Management Authority (LLFA)	<i>“It’s a really good, clear document that is well set out and objectives are clear...We’re interested to see the use of Alleviation instead of Prevention in terminology and how this impacts perception of the strategy”</i>	Agree - No response required	×

7. CONCLUSION

- 6.4. Respondents were generally supportive of the content and structure of the draft LFRMS and Action Plan, noting only minor suggested alterations which have been addressed within Sections 5 and 6 of this consultation report.
- 6.5. The feedback provided via the statutory public consultation will be used to inform any additions or changes to the final LFRMS and Action Plan and accompanying environmental assessments.

APPENDIX A: POSTER FOR THE PUBLIC CONSULTATION ON THE COUNCIL'S DRAFT LOCAL FLOOD RISK MANAGEMENT STRATEGY AND ACTION PLAN



Ymgynghoriad Cyhoeddus ar Strategaeth a Chynllun Gweithredu Rheoli Perygl Llifogydd Lleol (Drafft) y Cyngor

Public Consultation on the Council's Draft Local Flood Risk Management Strategy and Action Plan

21 Awst – 2 Hydref 2023 • 21 August – 2 October 2023

Mae'r Cyngor yn dymuno ceisio barn y cyhoedd, gweithwyr Cyngor Rhondda Cynon Taf, partneriaid risg ac awdurdodau cyfagos ar Strategaeth a Chynllun Gweithredu Rheoli Perygl Llifogydd Lleol (Drafft) Cyngor RhCT.

O dan Ddeddf Rheoli Llifogydd a Dŵr 2010, Cyngor RhCT yw'r Awdurdod Llifogydd Lleol Arweiniol ar gyfer ei ardal weinyddol. O dan y ddeddfwriaeth yma, mae'n ofynnol i Gyngor RhCT "ddatblygu, cynnal, cymhwyso a monitro" Strategaeth Rheoli Perygl Llifogydd Lleol.

Mae'r Strategaeth a Chynllun Gweithredu Rheoli Perygl Llifogydd Lleol yn cyflwyno amcanion, mesurau a chymau gweithredu Cyngor RhCT ar gyfer rheoli perygl llifogydd o ffynonellau lleol yn RhCT dros y 6 blynedd nesaf.

Bwrriad y Strategaeth a Chynllun Gweithredu yw darparu dull cyfannol a rhagweithiol tuag at reoli perygl llifogydd lleol ledled RhCT a bydden ni'n croesawu'ch adborth er mwyn llywio'r fersiwn derfynol.

The Council wishes to seek the views of the public, employees of Rhondda Cynon Taf County Borough Council (RCTCBC), risk partners and neighbouring authorities on RCTCBC's draft Local Flood Risk Management Strategy and Action Plan.

Under the Flood and Water Management Act 2010, RCTCBC is the Lead Local Flood Authority for its administrative area. Under this legislation, RCTCBC is required to "develop, maintain, apply and monitor" a Local Flood Risk Management Strategy (LFRMS).

The LFRMS and Action Plan presents RCTCBC's Objectives, Measures and Actions for managing the risk of flooding from local sources in RCT over the next 6 years.

The LFRMS & Action Plan aims to provide a holistic and proactive approach to managing local flood risk across RCT and we would welcome your feedback to inform the final version.

Ffynonellau lleol:
Local Sources:

-  Cwrs dŵr cyffredin
Ordinary Watercourse
-  Dŵr wyneb
Surface Water
-  Dŵr daear
Groundwater

 Am ragor o wybodaeth, sganwch y cod QR:
www.rctcbc.gov.uk/YmgynghoriadauPresemmol

 For further details scan the QR code or visit:
www.rctcbc.gov.uk/CurrentConsultations

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APPENDIX B: LIST OF CONSULTEES

Statutory Consultees	Non-Statutory Internal (RCTCBC) Consultees	Non-Statutory External Consultees
Public	RCTCBC Staff	Transport for Wales
Natural Resources Wales	Councillors	CADW
Dŵr Cymru Welsh Water	Cabinet Members	National Farmers Union
SWTRA – South Wales Trunk Road Agency	Local Town/Community Councils	Bannau Brycheiniog National Park Authority
Merthyr Tydfil CBC		Home Builders Federation
Caerphilly CBC		South Wales Fire & Rescue Service
Cardiff Council		South Wales Police
Bridgend CBC		National Health Service Wales
Powys County Council		CLA Cymru
Neath-Porth Talbot CBC		University of South Wales
Vale of Glamorgan CBC		Cardiff University
		Association of British Insurers
		Housing Associations
		National Flood Forum
		Cynon Taf – Community Housing Group