



RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

Cabinet

24th JANUARY 2024

**DRAFT REPORT ON THE ADOPTION OF THE AUTHORITY'S REVISED
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
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1. PURPOSE OF THE REPORT

- 1.1 To advise members on the outcome of the statutory public consultation on 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 To present the final Local Flood Risk Management Strategy and Action Plan for approval before sending to the Welsh Government for Ministerial approval.

2. RECOMMENDATIONS

It is recommended that: -

- 2.1 Members note the results and the review of the statutory public consultation on the draft LFRMS and Action Plan, which was presented to the Climate Change, Frontline Services & Prosperity Scrutiny

APPENDIX A

Committee on 22nd November 2023 as per the programme of work which was agreed by Cabinet on 15th May 2023¹.

- 2.2 Note the feedback from the Climate and Frontline Services Committee which met on 18th January 2024, which will be provided by the Service Director of Democratic Services and Communication;
- 2.3 The Local Flood Risk Management Strategy and Action Plan is adopted by the Authority.
- 2.4 The Local Flood Risk Management Strategy, and accompanying environmental assessment, are submitted to the Welsh Government for Ministerial approval.

3. REASONS FOR RECOMMENDATIONS

- 3.1 To enable members to consider the results and the CCFSP Scrutiny Committee's review of the statutory public consultation on the draft LFRMS and Action Plan.
- 3.2 The adoption of the revised Local Flood Risk Management Strategy and Action Plan meets the requirements under Section 10 of the Flood and Water Management Act 2010.

4. BACKGROUND

- 4.1 Under the FWMA 2010, Rhondda Cynon Taf County Borough Council (RCTCBC) is the Lead Local Flood Authority (LLFA) for its administrative area. Under this legislation, RCTCBC has a duty to develop, maintain, apply and monitor a strategy for local flood risk management, i.e., a LFRMS.
- 4.2 RCTCBC published their first LFRMS in 2013², setting out the Council's overarching approach to managing local flood risk. Subsequently in 2015, RCTCBC then published a Flood Risk Management Plan (FRMP)³, as required under the Flood Risk Regulations (2009). The FRMP developed the objectives and high-level measures outlined in the Local Strategy into a more detailed plan for managing the risk of flooding from local sources in our communities over the proceeding 6 years.
- 4.3 In October 2020, Welsh Government (WG) published the second iteration of the National Strategy for Flood and Coastal Erosion

¹ [Cabinet Report 15th May 2023 MTSP One4aLL LG \(moderngov.co.uk\)](#)

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

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

APPENDIX A

(FCERM)⁴. This places a duty on the Council under Section 10 (5) of the FWMA to review its current LFRMS and publish a revised version by October 2023. The latest version also requires the production of an Action Plan aligned to delivering the strategy.

- 4.4 This date has subsequently been revised to March 2024.
- 4.5 The decision to commence with the review of the LFRMS and Action Plan was proposed to and agreed by Cabinet Members on 29th November 2022⁵.
- 4.6 Following notification of the revised statutory publication date, the LLFA revised their high-level programme and timeline, to reflect the 6-month delay to the publication date, as agreed by Cabinet on 15th May 2023¹.
- 4.7 To inform and develop the revised LFRMS and Action Plan, an initial non-statutory public engagement exercise was undertaken to identify what key themes the constituents of RCT want the revised LFRMS and Action Plan to focus and improve on.
- 4.8 This was presented to the CCFSP Scrutiny Committee on 22nd March 2023, where the committee were afforded the opportunity to comment on the consultation and feed into the draft LFRMS and Action Plan. The CCFSP Scrutiny report and 'Initial Public Engagement Report' can be found on the Council's website⁶.
- 4.9 Feedback received by the CCFSP Scrutiny Committee on 22nd March 2023 was presented to Cabinet on 15th May 2023 and can be found on the Council's website¹. Members were supportive of the public engagement and the review of the LFRMS and Action Plan.
- 4.10 Furthermore under the FWMA, is the LLFA must consult on the draft LFRMS and Action Plan and the accompanying environmental assessments with the public and risk management authorities that may be affected by the strategy.
- 4.11 The statutory public consultation was conducted in-house and ran for a period of six weeks, from 21st August to 2nd October 2023 with the purpose to canvas opinion on the draft LFRMS and Action Plan and accompanying environmental assessments.

⁴ [National Strategy for Flood and Coastal Erosion Risk Management in Wales \(English\) \(gov.wales\)](#)

⁵ [Cabinet Report 29th November 2022 MTSP One4aLL LG \(moderngov.co.uk\)](#)

⁶ [Agenda for Climate Change, Frontline Services & Prosperity Scrutiny Committee on Wednesday, 22nd March, 2023, 5.00 pm - Rhondda Cynon Taf County Borough Council \(moderngov.co.uk\)](#)

APPENDIX A

- 4.13 The results and feedback received during the public consultation were positive, demonstrating general support for the draft LFRMS and Action Plan, in addition to the environmental assessment.
- 4.14 An overview of the results and feedback provided via the statutory public consultation was presented to the CCFSP Scrutiny Committee on 22nd November. The CCFSP Scrutiny report and 'Statutory Public Consultation' report can be found on the Council's website⁷. Members were supportive of the draft LFRMS and Action Plan and the relevant statutory public consultation, noting one recommendation for more targeted consultation during implementation of the final LFRMS and Action Plan for community specific measures and actions.
- 4.14 The results and feedback from the public consultation have been used to inform changes to the final LFRMS and Action Plan. The final LFRMS and Action Plan is included in Appendix 1. A summary of the key changes to the final LFRMS and Action Plan, and accompanying environmental assessments, has been discussed in more detail in Sections 5 and 6.

5. SUMMARY OF KEY CHANGES TO THE FINAL LFRMS & ACTION PLAN

- 5.1 To ensure consistency across Local Strategies produced in Wales, the Welsh Local Government Association (WLGA) have, in consultation with a focus group of Local Authorities including this Council. Prepared a LFRMS template which the Council has principally adhered to. The structure of the final LFRMS and Action Plan included in Appendix 1, is as follows:

Chapter 1: Introduces the background and purpose of the Local Strategy.

Chapter 2: Provides an overview of the legislative context which has informed the development of this Local Strategy. It also summarises how this Local Strategy aligns with our other strategic plans and how we have developed the Local Strategy in coordination with other stakeholder plans.

Chapter 3: Gives an overview of the different sources of flooding and presents an assessment of the risk of flooding across the Authority.

⁷ [Cabinet Report 22nd November 2023 MTSP One4aLL LG \(moderngov.co.uk\)](https://www.moderngov.co.uk/2023/11/22/cabinet-report-22nd-november-2023-mtsp-one4a-ll-lg/)

APPENDIX A

Chapter 4: Provides an overview of climate change in the context of flood risk and outlines how this Local Strategy seeks to address these risks in RCT.

Chapter 5: Sets out the roles and responsibilities for managing flood risk in RCT.

Chapter 6: Describes the strategic Objectives for managing flood risk in the coming years, and how these align with the objectives set out in the National Strategy.

Chapter 7: Sets out the flood risk management Measures. These are broad activities and ways of working which help us to meet our strategic objectives.

Chapter 8: Introduction to the Flood Action Plan. This is a focused plan, detailing specific deliverable actions required to meet our measures. The Flood Action Plan is included in Appendix A of the Strategy.

Chapter 9: Summarises the different ways in which flood risk management activities can be funded as well as how we prioritise these activities.

Chapter 10: Outlines how this Local Strategy will contribute to wider environmental objectives.

Chapter 11: Describes how we will measure and monitor our progress in delivering the objectives, measures and actions set out in this Local Strategy.

- 5.2 A summary of the key changes to the final LFRMS and Action Plan has been included in Table 1. The changes reflect how the LLFA have enhanced its final LFRMS and Action Plan to align with the feedback received via the statutory public consultation on the draft LFRMS and Action Plan.

Table 1: Summary of key changes to the final LFRMS and Action Plan

Section	Key Changes
General Structure	The front cover and header of the final LFRMS and Action Plan have been updated to improve the visual design.

APPENDIX A

Section	Key Changes
	<p>A foreword from the Leader of the Council, Councillor Andrew Morgan OBE, has also been included at the start of the document.</p> <p>'Appendix C: Public Consultation Outcomes' has been included in the final LFRMS and Action Plan which describe the outcomes of the Council's initial public engagement exercise (13th Dec 2022 – 24th Jan 2023) and the statutory public consultation (21st Aug – 2nd Oct 2023).</p> <p>Minor typos have been amended throughout the document.</p>
Chapter 1: Introduction	<p>Figure 1 describes the tiered approach to objectives, measures and actions to provide clarity on the strategic objectives which will be achieved by a range of measures which will be delivered through a set of planned actions. This has been updated to improve the visual design.</p>
Chapter 2: Coordination	<p>Following consultation with internal departments within the Authority, including Planning Policy and Countryside, minor amendments to the relevant Council strategies and plans that align with the LFRMS and Action Plan have been actioned to reflect the correct terminology. These include RCTCBC's revised Local Development Plan and the RCT Local Nature Partnership – 'Action for Nature' Plan.</p> <p>Figure 2 summarises the national, regional and local policies and plans that have informed the final LFRMS and Action Plan. This has been updated to reference 'Future Wales: The National Plan 2040 (2021)' and also to improve the visual design.</p>
Chapter 3: Flood Risk in RCT	<p>Figure 3 outlines the sources of flooding in RCT and who to contact in each case. This has been updated to include reservoir flooding and also to improve the visual design.</p> <p>The 'SINC area (Ha)' at high/medium/low flood risk in Tables 3-6 have 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.</p>

APPENDIX A

Section	Key Changes
<p>Chapter 4: Climate Change and Flood Risk</p>	<p>Minor amendments to the relevant national and local strategies and plans that align with the LFRMS and Action Plan and address the risk of climate change have been actioned to reflect the correct terminology. These include the 'Future Wales: The National Plan 2040' and the RCT Local Nature Partnership – 'Action for Nature' Plan.</p>
<p>Chapter 5: Roles and Responsibilities for Managing Flood Risk in RCT</p>	<p>Table 5 depicts the Risk Management Authorities responsible for managing the different sources of flooding in RCT. This has been updated to highlight the distinction between the role of the Highway Authority and Trunk Road Agency as Risk Management Authorities and also to improve the visual design.</p>
<p>Chapter 6: Strategic Objectives</p>	<p>The description of Objective 12 has been enhanced to include the LLFA's contribution towards the achievement of sustainable development in accordance with Section 27 of the FWMA 2010.</p>
<p>Chapter 7: Flood Measures</p>	<p>Minor amendments to Measures 1, 6, 8, 14, 15, 17, 18 and 31 have been actioned to reflect updated terminology, provide greater clarity and strengthen the wording used in certain areas.</p>
<p>Chapter 8: Flood Actions Appendix A: Flood Action Plan</p>	<p>The Flood Action Plan provides information at two scales. The RCT Flood Action Plan sets out the flood actions to be delivered across RCT (Table 1). Specific Flood Action Plans for each 12 SFRA has also been produced which contain actions at the local scale.</p> <p>Minor amendments to the wording of Action A20 in Table 1 has been actioned to reflect the relevant department leading on the delivery of the action. No further changes to the 31 RCT wide actions have been proposed.</p> <p>Minor amendments to the type and number of SFRA specific actions have been updated following a review of the Council's capital pipeline application process for Welsh Government funding. The number of SFRA specific actions has increased by 7. A breakdown of the 59 SFRA specific actions, along with a risk ranking based on the number of receptors at risk in each SFRA is provided below. The number of actions in each SFRA is proportional to risk.</p>

APPENDIX A

Section	Key Changes		
	SFRA	Receptors at Risk Rank	Total No of Actions
	Upper Rhondda Fawr	1	9 (+1)
	Lower Rhondda Fawr	2	5 (+2)
	Lower Taf	3	9 (+1)
	Mid Cynon 1	4	14 (+3)
	Lower Rhondda Fach	5	10
	Upper Rhondda Fach	6	2
	Taf East	7	1
	Ely	8	1
	Upper Cynon	9	1
	Lower Cynon	10	4 (+1)
	Mid Cynon 2	11	2 (-1)
	Taf West	12	1
	<p>Each flood action has been given an indicative timescale and cost for delivery, along with how the flood measure will be funded, status of the action (ongoing/not started) and how they align with the local flood measures. Only minor amendments to these factors have been made in the final Flood Action Plan and a more detailed breakdown of the financial implications of these actions is included in Section 9.</p>		
Chapter 9: Funding and Prioritisation	Minor amendments to the description of funding streams have been actioned.		
Chapter 10: Environmental Assessments	No alterations have been made to Section 10 of the final LFRMS and Action Pan.		
Chapter 11: Monitoring Progress	No alterations have been made to Section 11 of the final LFRMS and Action Pan.		

6. KEY RESULTS – ENVIRONMENTAL ASSESSMENTS (SEA & HRA)

- 6.1 In accordance with the relevant legislation, a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) was produced alongside the LFRMS which formed part of the consultation on the draft LFRMS and Action Plan.
- 6.2 The results and feedback received during the public consultation on the SEA and HRA were positive, demonstrating general support for the draft environmental assessments.

APPENDIX A

6.3 Minor alterations to the final SEA – Environmental Report in light of the consultation responses include greater reference to the impact of asset maintenance, green spaces and Natural Flood Management, and the role of woodland and forestry practices on the environment (including their impact on human health and wellbeing).

6.4 No alterations to the final HRA – Appropriate Assessment have been made following the results of the statutory public consultation.

7. **EQUALITY AND DIVERSITY IMPLICATIONS**

7.1 An Equality Impact Assessment (EIA) screening form has been prepared for the purpose of this report and was consulted upon as part of the public consultation on the draft LFRMS and Action Plan. It has been found that a full report is not required following consultation.

8. **CONSULTATIONS**

8.1 The 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.

8.2 The results and review of this exercise on the revised LFRMS and Action Plan was presented to CCFSP Scrutiny Committee on 22nd March 2023⁶. Members were supportive of the public engagement and the review and agreed their comments to be fed into the drafting of the revised Strategy.

8.3 It is a requirement of the FWMA 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.

8.4 The statutory public consultation on the draft LFRMS and Action Plan, and accompanying environmental documents, was conducted in-house and ran for a period of six weeks from 21st August to 2nd October 2023.

8.5 The results and review of the statutory public consultation on the draft LFRMS and Action Plan was presented to CCFSP Scrutiny Committee on 22nd November 2023⁷. Members were supportive of the draft LFRMS and Action Plan and the relevant statutory public consultation, noting one recommendation for more targeted consultation during implementation of the final LFRMS and Action Plan for community specific measures and actions.

8.6 Following consideration of the consultation responses and the CCFSP Scrutiny Committee's review, the draft LFRMS and Action Plan and accompanying environmental documents have been finalised and are presented to Cabinet in Appendix 1 for approval.

APPENDIX A

8.7 This is the final opportunity for Cabinet and CCFSP Scrutiny Committee to review and comment on the final LFRMS and Action Plan, and accompanying environmental assessments, before they are submitted to the Welsh Government for Ministerial approval, as per the agreed program presented to Cabinet on 15th May 2023¹.

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. These were presented to and agreed by Cabinet in draft form on 17th July 2023⁸.

9.3 The measures and actions placed as part of the final LFRMS and Flood Action Plan will incur costs over the life cycle of the LFRMS. In terms of financial implications, indicative costs have been grouped as follows:

- Existing Resources (ER): No cost implication. Within current budgets.
- Low Cost: Additional cost of £1K - £10K
- Medium Cost: Additional cost of £11K – £200K
- High Cost: Additional cost of £201K - £999K
- Very High Cost: Additional cost of £1m and above

Funding option(s) for each measure and action has also been provided. These are as follows:

- RCT Revenue
- WG Revenue Grant
- Capital Grant Funding
 1. WG FCERM Grant
 2. WG FCERM Small Scale Schemes
 3. WG Resilient Roads Fund.
- Potential Partnership Funding, both private and public.

9.4 Table 2 provides an indication of the financial implications of the final measures. The summary demonstrates that 87% of the final measures will have no cost implications, i.e., they will be delivered using existing resources within the current revenue budgets. 9% of the final measures will be delivered within the low to medium cost range through revenue/capital grants, as well as potential partnership funding. Only 3%

⁸ [Decision - Report to commence formal statutory consultation of the authority's review of the Local Flood Risk Management Strategy and Action Plan - Rhondda Cynon Taf County Borough Council \(modern.gov.co.uk\)](#)

APPENDIX A

of the final measures will have a medium to very high cost implication and this will be funded through capital grant and potential partnership funding.

Table 2: Summary of the number of final measures per indicative cost range

Indicative Cost	No of Measures
Existing Resources (Existing Revenue (ER))	27
Low – Medium Cost	3
Medium – Very High Cost	1

- 9.5 Table 3 provides an indication of the financial implications of the final actions for the RCT and SFRA Flood Action Plans contained in Appendix A of the Strategy. The summary demonstrates that 97% of the RCT Wide Flood Actions will have no financial implication, i.e., they will be delivered using existing resources within the current revenue budgets. 3% of RCT Wide flood actions will be delivered at low cost.

Approximately 61% (+23%) of SFRA specific flood actions will have a medium cost implication, 25% (-4%) will have a high cost implication and 9% (+1%) will have a very high cost implication. Each of the Capital actions within the SFRA Flood Action Plans will be funded through capital grants and RCT funding, mostly as match funding. The remaining 6% of flood actions will be funded through current revenue budgets and therefore incur no financial implication.

Table 3: Summary of the number of final actions (RCT and SFRA) per indicative cost range

Indicative Cost	RCT Flood Actions	SFRA Flood Actions
Existing Resources (ER)	30	3
Low Cost	1	0 (-10)
Medium Cost	0	36 (+16)
High Cost	0	15
Very High Cost	0	4 (+1)

10. LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED

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

APPENDIX A

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

- 11.1 The final LFRMS and Action Plan has identified 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 and the Council's former LFRMS and FRMP produced in 2013 and 2015, respectively. Furthermore, it reflects the sustainable development principles of the Well-being for Future Generations Act and will contribute to all seven national goals.
- 11.2 The final LFRMS and Action Plan has also identified opportunities to align with emerging local policies such as the Council's revised Local Development Plan, RCT's Local Nature Partnership – 'Action for Nature' Plan⁹ and the Council's Tackling Climate Change Strategy¹⁰.

12. CONCLUSION

- 12.1 Following the publication of the Welsh Government's National Strategy on FCERM in October 2020, there is a duty under S10 of the FWMA for the Council as LLFA to review and update its LFRMS. There is now a significant opportunity within this review to set a sustainable strategy to manage flood risk and build resilience and facilitate adaptation for future generations.
- 12.2 Improvements in available mapping and datasets, local evidence of the impacts of frequent storm events, together with the results from the initial public engagement exercise and comments raised by CCFSP Scrutiny Committee on 22nd March 2023, has provided the LLFA with an enhanced understanding of local flood risk. This has allowed the development of objectives, measures and actions which reflect the current challenges facing RCT.
- 12.3 The results from the statutory public consultation on the draft LFRMS and Action Plan and environmental assessments, in addition to the comments raised by CCFSP Scrutiny Committee on 22nd November 2023, have been positive and this has demonstrated overall support for the draft LFRMS and Action Plan from the public and relevant risk management authorities.
- 12.4 Feedback provided as part of the public consultation has informed the changes made to the final LFRMS and Action Plan and environmental assessments which is presented to Cabinet in Appendix 1.

⁹ [RCT Action 4 Nature \(rctlnp.wixsite.com\)](https://www.rctlnp.wixsite.com)

¹⁰ Think Climate RCT - Pdf ([browsealoud.com](https://www.browsealoud.com))

APPENDIX A

- 12.5 It is important to note, this is the final opportunity for Cabinet and CCFSP Scrutiny Committee to review and comment on the final LFRMS and Action Plan, and accompanying environmental assessments, before they are submitted to the Welsh Government for Ministerial approval.

Other Information: -

Relevant Scrutiny Committee

Contact Officer

DRAFT