



SUBJECT: MONMOUTHSHIRE FLOOD RISK MANAGEMENT PLAN
MEETING: Cabinet Member for County Operations
DATE: 27th April 2016
DIVISION/WARDS AFFECTED: All

1. PURPOSE:

To seek approval of the Flood Risk Management Plan for Monmouthshire following public consultation.

2. RECOMMENDATIONS:

2.1 To approve the final version of Flood Risk Management Plan for Monmouthshire.

3. KEY ISSUES:

3.1 Flood Risk Management Plan

3.1.1 There was a requirement for the Council to produce a Local Flood Risk Management Strategy by April 2013. This requirement was set out in the Flood & Water Management Act of 2010 (F&WMAAct) when Monmouthshire was also designated as a Lead Local Flood Authority (LLFA). It was also identified as a requirement in the Welsh Governments National Strategy for Flood and Coastal Erosion Risk Management in December of 2011. The Strategy was prepared and reported to Cabinet on 3 April 2013. Following Cabinet approval it was submitted to Welsh Government for Ministerial approval and that was received in late April 2014. The Strategy was then published, as required, on the Council's web page. It can be viewed at the following link:

<http://www.monmouthshire.gov.uk/flooding>

3.2 Flood Risk Management Plan

3.2.1 As part of the F&WMA Act and Welsh Government's National Strategy we were also required to prepare a Flood Risk Management Plan which would incorporate Flood Risk maps. The timescale for this was submission to Welsh Government by the end of February 2016. The first guidance was provided in May 2014 and subsequently a template for the Plan in Wales was provided through the Regional Flood Groups with a further revision in December 2014. The mapping data required to do the analyses was provided by the Environment Agency and Natural Resources Wales and this was delayed due to its translation into the formats needed and that also arrived in December 2014.

3.2.2 The preparation of the Plan has required substantial work and review of mapping layers for surface water flooding areas, as well as other flooding types, including both velocity and depths of flood water to assess risk and hazard. Much of this Plan has drawn upon the Preliminary Flood Risk Assessment done in 2011 and the Local Flood Risk Management Strategy referred to above. Following discussion with the Welsh Local Government Association (WLGA) and Natural Resources Wales (NRW) we were able to establish that it would not require a further Strategic Environmental Assessment to be done or a further Habitats Risk Assessment carried out, provided we retained the Objectives and Measures set out in the Strategy. We have adopted that approach and this has avoided substantial additional costs and time although the timescale has still been challenging.

3.2.3. A working draft was produced by August 2015 and then circulated for internal & officer consultation. A revised version taking account of comments was then reported to the Strong Communities Select Committee on 14 September 2015 although there were still some details to complete at that stage. A final version was circulated to all Members of the Strong Communities Select Committee in November for any final comments. A Public Consultation version was then made available on our web page on 15 December 2015 with a closing date for comments of 1st February 2016. This was notified by sending emails to all consultees with a link to the Plan, as the size of it with the detailed maps, was too large to email around. The Consultees covered; all County Councillors, all managers and senior MCC staff, all 33 Town & Community Council Clerks and some 36 relevant external bodies, organisations and individuals. In addition it was made available through the libraries and one stop shops with a Press Release in early January. Reminder emails with the link to the web page were issued in mid-January. A list of the organisations and bodies consulted is attached at Appendix 2.

3.2.4 Following closure of the public consultation stage the comments have been reviewed, commented on and appropriate changes to the FRMP identified. This has included some comments that came in after the closing date. Appendix 3 is a table with all the responses received, our comments and any actions or changes to the FRMP highlighted. The final FRMP has been amended to include those changes.

3.2.5. In parallel to the preparation of the Monmouthshire Flood Risk Management Plan the Environment Agency and Natural Resources Wales have prepared the second version of the Severn River Basin Management Plan. They have also produced a Severn Flood Risk Management Plan that covers the flooding risks from the main rivers and the sea. Drafts were circulated for consultation earlier this year and final versions have been published in early 2016. The following provides links to those documents. Relevant extracts from the consultation draft versions of those documents have been included within this document for information.

Severn River Basin Management Plan:

www.gov.uk/government/collections/river-basin-management-plans-2015

Severn Flood Risk Management Plan:

<https://www.gov.uk/government/collections/flood-risk-management-plans-frmps-2015-to-2021>

4 REASONS:

4.1 The work was a requirement of the new Flood & Water Management Act 2011 and by the Welsh Government's National Strategy for Flood and Coastal Erosion Risk Management. issued in December 2011. It sets out the objectives and measures (actions) we plan to take to deal with flood risk from surface water and ordinary watercourses In Monmouthshire over the next 6 years.

5. RESOURCE IMPLICATIONS:

5.1 The work has required us to draw on knowledge and information held both in records and officers local knowledge as well as considerable analysis. The Welsh Government have made available grant funding of some £130,000 in the 2015/16 financial year to fund all the requirements of the new Act, which includes preparing the Flood Risk Management Plan. Funding for the coming year has been part of a bid process and included £100,000 for flood and land drainage issues and utilising some £30,000 from grant underspends in earlier years. The Plan identifies an annual revenue cost of £130,000 and future years funding is subject to bids being made to Welsh Government.

6. WELLBEING OF FUTURE GENERATIONS IMPLICATIONS (INCORPORATING EQUALITIES, SUSTAINABILITY, SAFEGUARDING AND CORPORATE PARENTING):

The significant equality impacts identified in the assessment (Appendix 1) are summarised below for members' consideration:

A reduction of flood risk to residents across the Monmouthshire bringing health, environmental and wellbeing benefits

The actual impacts from this report's recommendations will be reviewed every **6** years and criteria for monitoring and review will include:

A full review of Flood Risk Management Plan in line with Welsh Government guidance.

7. CONSULTEES:

Senior Leadership Team & County Councillor B Jones, Cabinet Member for County Operations

8. BACKGROUND PAPERS:

The Flood and Water Management Act 2010,

The National Strategy for Flood & Coastal Erosion Risk Management and, Guidance on the preparation of Flood Risk Management Plans.

10. AUTHOR:

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Head of Operations

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Future Generations Evaluation (includes Equalities and Sustainability Impact Assessments)

<p>Name of the Officer completing the evaluation</p> <p>David Harris</p> <p>Phone no: 01633 644707 E-mail: daveharris@monmouthshire.gov.uk</p>	<p>Please give a brief description of the aims of the proposal. To gain Cabinet Member Approval of the Flood Risk Management Plan</p>
<p>Name of Service</p> <p>Operations – Land Drainage</p>	<p>Date Future Generations Evaluation form completed</p> <p>30 March 2016</p>

NB. Key strategies and documents that may help you identify your contribution to the wellbeing goals and sustainable development principles include: Single Integrated Plan, Continuance Agreement, Improvement Plan, Local Development Plan, People Strategy, Asset Management Plan, Green Infrastructure SPG, Welsh Language Standards, etc



1. Does your proposal deliver any of the well-being goals below? Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal.




Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
A prosperous Wales	Yes by reducing flood risks to residents, identifies ways forward that will specialist skills within the area.	No negative impacts

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
Efficient use of resources, skilled, educated people, generates wealth, provides jobs		
A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change)	Yes –aims to reduce flood risk to Monmouthshire residents by raising awareness and identifying ways residents can help themselves.	No negative Impacts
A healthier Wales People’s physical and mental wellbeing is maximized and health impacts are understood	Avoidance of flooding and mitigation of flood risk brings significant health benefits	No negative Impacts
A Wales of cohesive communities Communities are attractive, viable, safe and well connected	Reducing flood risk improves the safety of residents	No negative Impacts
A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental wellbeing	This is part of a UK wide approach and reducing flood risk brings environmental benefits and the solutions themselves generally increase / improve habitats	No negative Impacts
A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh language are promoted and protected. People are encouraged to do sport, art and recreation	No impact	No impact

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
A more equal Wales People can fulfil their potential no matter what their background or circumstances	Reducing flood risk benefits all residents	No negative impact

2. How has your proposal embedded and prioritised the sustainable governance principles in its development?

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
 <p>Long Term</p> <p>Balancing short term need with long term and planning for the future</p>	Yes. The Plan is based on a 6 year cycle in line with Welsh Government Guidance. As such the actions are set out over this timescale and the Plan itself will be revisited in 6 years time	Yes. The Plan is partly dependent on funding through Welsh Government and this involves submitting bids each year.
 <p>Collaboration</p> <p>Working together with other partners to deliver objectives</p>	A key element of delivering the plan is working with partners including other Risk Management Authorities such as NRW and the Wye Valley AONB	No

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
 <p data-bbox="219 552 376 576">Involvement</p> <p data-bbox="427 328 607 507">Involving those with an interest and seeking their views</p>	<p data-bbox="640 312 1267 592">Members, Town & Community Councils, Residents, MCC staff and a range of external organisations are the Stakeholders and were consulted as part of a Public Consultation exercise from 15th Dec 2015 to 1st February 2016. Responses received have been analysed and the Plan amended to take account of those.</p>	<p data-bbox="1301 312 1346 336">No</p>
 <p data-bbox="232 847 369 871">Prevention</p> <p data-bbox="421 608 600 887">Putting resources into preventing problems occurring or getting worse</p>	<p data-bbox="640 612 1245 711">Reducing flood risk through the actions set out is very much about avoiding and mitigating the risks of flooding to residents</p>	<p data-bbox="1301 612 1346 636">No</p>
 <p data-bbox="237 1150 376 1174">Integration</p> <p data-bbox="427 909 607 1157">Considering impact on all wellbeing goals together and on other bodies</p>	<p data-bbox="640 912 1245 1011">Yes, as together with others we will reduce the risks of flooding to Monmouthshire Residents</p>	<p data-bbox="1301 912 1346 936">No</p>

3. Are your proposals going to affect any people or groups of people with protected characteristics? Please explain the impact, the evidence you have used and any action you are taking below. For more detailed information on the protected characteristics, the Equality Act 2010 and the Welsh Language Standards that apply to Monmouthshire Council please follow this link:<http://hub/corporatedocs/Equalities/Forms/AllItems.aspx> or contact Alan Burkitt on 01633 644010 or alanburkitt@monmouthshire.gov.uk

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Age	Benefits are to all residents of Monmouthshire	None	None
Disability	Benefits are to all residents of Monmouthshire	None	None
Gender reassignment	Benefits are to all residents of Monmouthshire	None	None
Marriage or civil partnership	Benefits are to all residents of Monmouthshire	None	None
Pregnancy or maternity	Benefits are to all residents of Monmouthshire	None	None
Race	Benefits are to all residents of Monmouthshire	None	None
Religion or Belief	Benefits are to all residents of Monmouthshire	None	None
Sex	Benefits are to all residents of Monmouthshire	None	None

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Sexual Orientation	Benefits are to all residents of Monmouthshire	None	None
Welsh Language	Benefits are to all residents of Monmouthshire	None	None

- 4. Council has agreed the need to consider the impact its decisions has on important responsibilities of Corporate Parenting and safeguarding. Are your proposals going to affect either of these responsibilities?** For more information please see the guidance <http://hub/corporatedocs/Democratic%20Services/Safeguarding%20Guidance.docx> and for more on Monmouthshire's Corporate Parenting Strategy s<http://hub/corporatedocs/SitePages/Corporate%20Parenting%20Strategy.aspx>

	Describe any positive impacts your proposal has on safeguarding and corporate parenting	Describe any negative impacts your proposal has on safeguarding and corporate parenting	What will you do/ have you done to mitigate any negative impacts or better contribute to positive impacts?
Safeguarding	None	None	None
Corporate Parenting	None	None	None

5. What evidence and data has informed the development of your proposal?

The data used is set out in the report and includes map based flood risk areas derived from plans and data provided by Natural Resources Wales and the Environment Agency. It has also used population data drawn from Ordnance Survey address data and used local population data drawn from the 2011 census. Further data has been drawn from flooding records held by MCC.

6. SUMMARY: As a result of completing this form, what are the main positive and negative impacts of your proposal, how have they informed/changed the development of the proposal so far and what will you be doing in future?

The main positive impacts are the reduction in flood risk to Monmouthshire residents over the next 6 years. This will improve the health, environment and wellbeing of residents.

7. ACTIONS: As a result of completing this form are there any further actions you will be undertaking? Please detail them below, if applicable. None

What are you going to do	When are you going to do it?	Who is responsible	Progress
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

8. MONITORING: The impacts of this proposal will need to be monitored and reviewed. Please specify the date at which you will evaluate the impact, and where you will report the results of the review.

The impacts of this proposal will be evaluated in: April 2022

9. VERSION CONTROL: The Future Generations Evaluation should be used at the earliest stages of decision making, and then honed and refined throughout the decision making process. It is important to keep a record of this process so that we can demonstrate how we have considered and built in sustainable development wherever possible.

Version No.	Decision making stage	Date considered	Brief description of any amendments made following consideration
1	<i>Public Consultation</i>	Feb 2016	<i>A number of additional actions were included for a number of Communities in the Plan as well as some textual additions.</i>

List of Organisations, Bodies & Individuals Consulted

Internally to MCC

All MCC Elected Members
Planning
Countryside
Emergency Planning
Environment Health
Highways - Traffic & Development
Passenger Transport Unit
Highways Operations
Grounds Maintenance Operations
Highways Area Engineers
Highways Trunk Roads
One Stop Shops at Abergavenny, Monmouth, Caldicot, Chepstow, Usk
Libraries at Usk, Abergavenny, Monmouth, Caldicot, Chepstow
Chief Executive & Senior Leadership Team
All MCC Managers

Externally

All Town & Community Councils (Via Clerks)
Natural Resources Wales
Cadw
Dwr Cymru / Welsh Water
Welsh Government
Brecon Beacons National Park

Newport CC
Torfaen CBC
Blaenau Gwent CBC
Powys CC
Herefordshire CC
Gloucestershire CC
Forest of Dean Council
Gwent Police
Canal & River Trust
RSPB
Countryside Landowners Association
Wye Valley AONB
Gwent Wildlife Trust
David Davies MP
Nicholas Ramsay AM
South Wales Fire Service
South Wales Ambulance Service
Aneurin Bevan Health Board
National Grid
Wales & West Utilities
Western Power Distribution
BT
Network Rail
National Flood Forum
National Farmers Union
Farmers Union of Wales
Farmers Union of Wales - Gwent Branch
Severn Estuary Partnership
Coastguard Service
Monmouth Housing Association MHA
Welsh Government - Highways Trunk Road Agency - SEWTRA

FRMP Consultation Responses

FRMP Consultation Responses

Consultee	Comments	Response / Actions
<p>Lynda Green (Mrs), Operations Director, Terrain Aeration Services Ltd.</p>	<p>Once the flood waters have receded you will be able to assess the damage. Flood waters are heavy enough to force the oxygen out of the soil, leaving dead or dying roots of turf and trees. My Terralift machine is able to put the necessary oxygen back into the soil structure and help with the rejuvenation process. This will be enough to save important trees and get sports and schools playing fields up and running again. There will have been some nasty detritus in flood waters (sewage and oils) so it is vital to get oxygen back into the soil to get it working again and able to recover itself.</p>	<p>The facility offered is noted and will be recorded for future use.</p> <p>No amendment to the Draft FRMP is required from this comment.</p>
<p>John Cadman, Llanvair Kilgeddin</p>	<p>I would like to add to provide further input to the Flood Management Plan [pages 106 to 109] as far as it effects Llanvair Kilgeddin based on observation of the surface water flooding that has been experienced in the village in recent years: most recently during the morning of Christmas Eve 2015. The sources of the water that cause the flooding on the R53 by St Mary's Yard are:</p> <ol style="list-style-type: none"> 1. Down the R53 itself from the junction with Highmead Lane past St Mary's Hill and St Mary's Cottage. Water runs off the land adjacent to Highmead Lane along the lane and onto the R53. When the land is saturated, further water runs off the fields above St Mary's Hill that are higher than the road. 2. Down the unmade road to Upper Pentwyn Farm to join the R53 between St Mary's Cottage and Stud Cottages. 3. Down Gethin Place from the fields at the north end to join the R53 opposite "Medano". 4. In the most extreme conditions from the un-named brook that runs in front of St Mary's Cottage and under the road to Upper Pentwyn Farm before executing an S-bend when it breaks its' banks. 	<p>Further investigations to the widespread flooding over the Christmas are in hand, including Llanvair Kilgeddin.</p> <p>A funding bid for a PAR (Project Appraisal Report) is in preparation and the information provided will be helpful in that bid and the PAR if funding is successful. This is the first stage of developing a scheme and to obtain grant aid from Welsh Government.</p> <p>On the specific items raised:</p> <ol style="list-style-type: none"> a) Cleansing of the drains has been referred to our Highway Operations team. b) The issues raised will be passed to colleagues in the planning dept. c) This part of the investigation in hand d) This will be picked up as part of the Community Flood Plan <p>As far as the FRMP is concerned the Objectives in LLO105 and 106 cover the core issues raised.</p> <p>No amendment to the Draft FRMP is required from these comments.</p>

5. The attached schematic illustrates these sources and the storm drains that are in place along the R53. On Christmas Eve of 2015, the road in front of St Mary's Yard flooded to the extent of threatening these properties and approaching Lambetta House. The un-named brook also rose to a level threatening St Mary's Cottage to the extent that the Highways Department were called out to place sand bags alongside the brook to protect the property.

On this occasion the sources of the flooding in front of St Mary's Yard was from items (1) and (3) above: down the R53 from Highmead Lane and down Gethin Place. The drains failed to prevent the water reaching the village. The grills over these drains had been cleared earlier in the week by residents of the village who were concerned at the amount of leaves, twigs and mud on the road surface. However the volume of water swept debris from a larger area over grills thus blocking the drains again. Once they were cleared it was evident that two of the drains [referenced as 6L and 6R on the schematic] were blocked beneath the grills: contrary to the reference LLO02 on page 107 that states that the drainage system has been investigated and cleared to the river. 6L in particular has to my knowledge been blocked for at least two years. The measures [references LLO105 and LLO106] on page 108 need therefore to be expanded to include:

1. In LLO105 the inclusion of the direction of surface water coming down the lane to Upper Pentywn Farm into the un-named brook to prevent it reaching the R53.
2. In LLO106:
 - a) the clearance of drains 6L and 6R.
 - b) the inclusion in any potential development on the field at the north end of Gethin Place [as proposed in the LDP] of measures to prevent surface water draining from this field into Gethin Place. This may be implied by the phrase in LLO106 "as part of any local development" but this is not entirely clear.
 - c) investigation of the action necessary to prevent surface run-off onto Highmead Lane reaching the R53.
 - d) development of annual action plans [in conjunction with local residents] to keep the drain grills clear of vegetation,

	<p>leaves, twigs and mud. In this regard we are sure that there would be residents willing to volunteer to assist in this but, when there is large scale debris over the whole road, the residents lack the necessary equipment for large scale clearance and the assistance of a road sweeper in late autumn each year is necessary.</p>	
<p>Lee Hamer. Bennetts Solicitors Attorneys & Notaries.</p>	<p>I live in Little Mill.</p> <p>I have read the Monmouthshire Flood Risk Management Plan December 2015 (“the Plan”) and I wish to make the following comments / observations for what they may be worth. My property sits adjacent to the Berthon Brook which runs through Little Mill to Usk. I note that there is reference to the Berthon Brook and to Little Mill at 7.4.7 (p 70) of the Plan and also at 7.4.11 (p81).</p> <p>The Plan states (wrongly in my view) that:</p> <ol style="list-style-type: none"> 1. Flooding incidences in Little Mill are as a result of blocked pipes etc; and 2. The Berthon Brook can flood in Monkswood and Usk (no mention of Little Mill). <p>The Berthon Brook floods in Little Mill annually, sometimes on several occasions a year. I have seen the brook flood to the rear and side of my own property into the gardens of Millbrook Place on numerous occasions and to the properties near the Village Hall.</p> <p>My property has thus far (fortunately) been protected by private flood wall defences but on 1 January 2014, when the entire village was flooded (see below) we did have some water enter the garage on the basement floor. This was from the Berthon Brook flooding the neighbouring properties at Millbrook place and water seeping through the ground and walls into Cornmill Orchard.</p> <p>Just last week the brook flooded at the Village Hall through to Monkswood. The Brook runs through agricultural fields through Little Mill and those fields are a flood plan which frequently</p>	<p>There were significant flooding incidents in Little Mill over Christmas, as there were in many parts of the County. All of these are currently being investigated. The main issues previously reported have been where the Berthin Brook crosses under the A472.</p> <p>The FRMP draft was prepared last Summer/Autumn before the current events. Your comment does not reflect what the Plan actually says but the concerns you raise for Little Mill are recognised.</p> <p>Where there are blockages we will be requiring relevant landowners to clear the watercourse, using our powers in the Land Drainage Act.</p> <p>We will amend the FRMP by adding the following action: <i>GF105 Investigate surface water flooding at Little Mill and identify actions that can be taken to reduce flood risk.</i> And the following additional text: <i>Some areas of Little Mill are also at risk from surface water flooding from adjacent higher ground.</i></p>

	<p>flood. There are blockages (fallen trees etc) all along that stretch which is exacerbating the situation and in my opinion, has the potential to cause problems for the village in future unless properly cleared.</p> <p>Also on 1 January 2014, the Cae Melin estate was very badly flooded. I witnessed water rushing from the hills to the rear of Cae Melin and through the estate into homes. This was not a result of a blocked drain. This was a considerable amount of water coming off the hills. The Half-Way House pub was also flooded. I note that the culvert at Cae Melin is mentioned. It is true that the drainage in Little Mill needs substantial work (the drains fill after a few hours rainfall), but I think the flood risk at Little Mill is underestimated by this current draft plan because it doesn't properly address the potential for the Berthon Brook to flood at several points and / or the flood risk to Cae Melin and lower properties.</p>	
<p>Steve Atkins, Usk.</p>	<p>Having seen the above document I noticed that there is no mention of the flooding to the fields along the river bank between the rear of the Willows Garden Centre and the Usk Cricket Club and wondered if you realised that this land floods periodically. I attach some pics from 2013 taken from my garden in Mill Street where the flood water almost reached the garden centre at the end of Baron Street</p>	<p>The photographs show flooding to agricultural land and will be kept as a record.</p> <p>No amendment to the Draft FRMP is required from these comments.</p>
<p>Vivien Mitchel, Ann Eggleton & Haydn Cullen-Jones – Transition Monmouth</p> <p>Peter Brundret & David Hoyle – Monmouth Partnership Forum</p> <p>Alastair Robertson – Vale of Usk</p> <p>Debbie McCarty & Hazel Clatworthy – MCC Sustainability</p>	<p>There was huge interest in your Flood Risk Management Plan while, at the same time, no one was aware of it or that it was in a stage of consultation – not even Monmouth Town Council. There was unanimous agreement that it should be widely discussed + to this end both groups have requested:-</p> <p>Public meetings in Monmouth, Chepstow + Abergavenny at the very least, with appropriate Officers + Cabinet Members present, to be held before the deadline for the consultation process. Both groups are aware that this will be difficult, if not impossible, with the existing deadline so have requested the deadline be extended</p> <p>We have noted the Prevention Measures as set out in Table 4.2 of your report. However, this is locking the door after the horse</p>	<p>The Consultation has been wide, including publicity in the local media, circulation to Town & Community Council Clerks, organisations, utilities, other risk management bodies, adjacent Council's, libraries and one stop shops, as well as internally at all levels and all County Councillors.</p> <p>We have a very tight timescale and the final version is to be with Welsh Government by the end of February to meet both National and EU Regulation deadlines.</p> <p>The core objective of working with other Risk Management Authorities fits well with your suggestions of the wider working arrangements need to help deliver those aspects outside our powers and resources. This</p>

Marcus Perrin &
Philip Powell –
Transition Chepstow

has bolted. What we would like to see are measures that stop the floods happening in the first place by way of, inter alia:-
Tree + other planting to make ground more porous + reduce run off
Management of watercourses to reduce water speed
Development of water holding areas
Maintaining flood plains, + certainly stop building on them with immediate effect

We understand the problems cannot be solved by MCC alone but they require inter-agency working involving NRW, EA + others. However this must be possible if there is a will to do so + someone is willing to take the lead. We would really like our County Council to be this 'someone' making Monmouthshire a flagship county
Appropriate measures would save MCC considerable trouble + money, + save residents hardship + inconvenience

We understand funding is available for such projects. The Vale of Usk RDP (which includes Monmouthshire) has £3 million available for feasibility studies which, if acceptable, would lead to access of much larger funds for implementation. There is also the 'Create Your Space Programme' whereby the Big Lottery Fund Wales has a total of £8.8 million to help communities make positive + sustainable transformation to their local natural environment

I could go on – but we all ought to sit down + discuss the problems + possible solutions. We are sure you would find great willingness for groups + individuals to work together in identifying possibilities; everyone is affected by flooding but it requires coordination to achieve results.

In summary, in order to undertake a meaningful consultation:-

Please extend the deadline so that consultation can take place
Please hold public meetings in at least the three main towns

would include further work with the Wye Valley AONB, Wye and Usk Foundation, NRW's flood and forestry departments.

We would not support a Public Meeting as such but a joint workshop approach with a wide range of partners, including organisations like Transition Monmouth could help deliver a wider range of benefits than the FRMP itself. NRW have also developed an FRMP to cover the main rivers and the sea so would be key to any joint working. It is suggested we seek to arrange a broad based workshop on flood issues later this year, date subject to getting as many of the relevant organisations together as possible.

In respect of the three summary issues submitted the following comments are given:

1. Agreed, but these are generally outside MCC's powers and resources.
2. Again there are limited opportunities for MCC to create these, but where possible this will be sought
3. Very few watercourses lie on MCC's own land and we would discourage any actions that might increase flood risk.

We do require landowners to remove obstructions where they could lead to flooding, we have not proposed or constructed an 'expensive barriers' and disagree that warning systems are too late – they do give residents time to take action to minimise the impacts.

No amendment to the Draft FRMP is required from these comments.

	<p>We look forward to hearing from you + trust we can all work out a way of working together. In the light of the recent floods we have all become better educated on prevention measures. Those that have proved particularly effective include:-</p> <ol style="list-style-type: none"> 1. Tree planting to make the ground more permeable + drastically reduce run off; woodlands absorb 60 to 70 times more water than grasslands 2. Create more flood plains + upstream water holding areas 3. Don't straighten out streams + rivers, + indeed place artificial partial barriers; this reduces the rate at which water flows + hence prevents accumulation that produce floods <p>Nowhere in the draft plan do I see mention of any of these measures. It's all about costly barriers, clearing streams etc to increase flow (that then produces flooding elsewhere), + warning systems (by which time it's too late to prevent flooding). There is nothing about prevention.</p> <p>An interesting plan has been implemented in Pickering, North Yorkshire:</p>	
<p>David Hoyle Secretary - Monmouth Partnership Forum</p>	<p>At a meeting of the Forum last Wednesday, Vivien Mitchel raised concerns about consultation on the Flood Risk Management Plan that had been issued for comment and members were both anxious to see the deadline date extended and for full and proper consultation to take place on this key issue affecting us all.</p>	<p>We have a very tight timescale and the final version is to be with Welsh Government by the end of February to meet both National and EU Regulation deadlines. We will take account of all comments we receive and have advised that we would still take comments after that and if they require amendments to the Plan will create an Addendum to the Plan. We do not see that the deadline stops further discussions on how the Plan can be delivered and are sure that wider discussion will be helpful as there is a role for all groups and individuals to play their part to help reduce flood risk.</p> <p>No amendment to the Draft FRMP is required from this comment.</p>

<p>Ann Davison, Clerk, Trellech United Community Council.</p>	<p>Response from Trellech United Community Council to MCC: Flood Risk Management Plan</p> <p>1. The data and modelling on which the flood hazard maps have been based will quickly become out of date as a result of: the gathering of better local information the impact of further building in both towns and rural areas We understand that the flood hazard maps will be formally updated every six years. In the interim it will therefore be necessary that the Planning Department, Highways, etc increasingly consult several sets of data and synthesise the results, in order to get an accurate view of current risks. This is unlikely to be workable. We believe there should be a commitment for more regular reworking of the models.</p> <p>2. There is no firm commitment to a completion date for the collection of asset data: although proposed expenditure is identified, page 25 of the report (section 4.2) states that "completing the collection of this data will be undertaken over time as resources permit". We are concerned that unless the assets are identified - especially those that could have a significant impact on flooding - they will not be maintained, thus exacerbating the situation.</p> <p>3. It would be helpful, in fact probably essential, to provide some idea of what a Community Flood Plan should encompass. We understand that there will be a Monmouthshire template but there has not been the resource available to create it yet. If there is likely to be a major delay on this it might be better to use the existing Environment Agency plan.</p> <p>4. Better, easier to find, contact information for the Land Drainage Team is needed on the MCC website. Coherent arrangements need to be defined for collecting past and future flooding event details. MCC also needs to put in place robust</p>	<p>To clarify a couple of your points:</p> <p>1. It is the Plan (ie the FRMP) that will be revised every six years, the flood plans themselves are updated regularly by Natural Resources Wales, so the Planners will always have access to the latest information – as also will the public as they are on the NRW's web pages. You are right that local knowledge will also play its part in updates.</p> <p>2. The data collection is intended to be substantially completed over the next 3 years but that is subject to resources. It is also appreciated that data collection will continue after that as new developments and currently unknown items are discovered.</p> <p>3. We will develop a Community Flood Plan pro forma once we have completed the consultation and share that as a draft for comment with all the Town & Community Councils.</p> <p>4. We agree the Land Drainage aspects are not well covered on our Web page and that is in hand. Most is currently with the Emergency Planning section and Flooding needs a stand alone section.</p>
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	<p>processes for the sharing of information within the organisation. For instance, if Highways are notified of a flood affecting a road, the information should automatically make it onto the issues section of the Assets database. It shouldn't be necessary for members of the public or local councillors to notify two or more different officers at MCC.</p> <p>5. MCC should move to implement all aspects of its draft culverting policy (attached as Appendix 6) without delay.</p>	<p>5. The Culverting Policy will come formally into play once the FRMP is approved by Members and Welsh Government.</p> <p>No amendment to the Draft FRMP is required from this comment.</p>
<p>S W Robertson, Llanvair Kilgeddin.</p>	<p>I write in response to the "Local Flood Risk Management Strategy" insofar as it relates to the village of Llanvair Kilgeddin.</p> <p>Over several years following occasions of heavy precipitation, there has been surface water flooding issues on the R53 St Marys Yard road running through the village. This issue came to a head during the Christmas of 2015, when the potential flooding of properties adjacent to the highway was narrowly averted by action taken by the local residents themselves and the Council.</p> <p>The cause of this flooding in St Marys Yard/R53 is manifold, a brief outline summary of some of the major causation factors is detailed below.</p> <p>(a) Rainwater from Highmead Lane and fields above St Marys Hill is collected by the R53 and channelled towards the village. (b) An unmade farm lane to Pentwyn Farm similarly directs water onto the R53. (c) An unnamed brook, running from St Marys Cottage down to a minor bridge by Pentwyn Farm lane is also prone to overtopping when there is heavy precipitation. (d) From field water running into Gethin Place which in turn runs into the R53. In extremis water will form a catchment area at the lower end of the field and then exit through the field gate and through the hedge opposite the bungalows and houses.</p>	<p>Further investigations to the widespread flooding over the Christmas are in hand, including Llanvair Kilgeddin.</p> <p>A funding bid for a PAR (Project Appraisal Report) is in preparation and the information provided will be helpful in that bid and the PAR if funding is successful. This is the first stage of developing a scheme and to obtain grant aid from Welsh Government.</p> <p>On the specific items raised:</p> <ol style="list-style-type: none"> 1. Cleansing of the drains has been referred to our Highway Operations team. 2. The development issues raised will be passed to colleagues in the planning dept. <p>Any future development would need to identify how it would manage existing surface runoff on adjacent land and on the site itself, including discharge, meet the requirements of current legislation set out in TAN15 (Welsh Governments guidance) and satisfy the Planning requirement, in a manner that does not add to or increase flood risk to existing properties.</p> <p>As far as the FRMP is concerned the Objectives in LLO105 and 106 cover the core issues raised.</p> <p>No amendment to the Draft FRMP is required from these comments.</p>

(e) A high proportion of the grates and drains located on the R53 are filled or covered by debris in the autumn and winter period. This effectively causes water to bypass a series of upper drains, subsequently placing sufficient overload volume on lower drains that are incapable of handling such volumes of water.

Relative to (c) above and LLO102 and LLO106 - P108 it is felt appropriate to highlight the implications of the proposed housing development under the MCC LDP. The proposed site is subject to regular surface flooding due to the topography. Surface water from adjacent fields to the North and West collects at the lower Southern boundary of the field at the Northern perimeter of the village. In previous years viz (Yrs. 2000, 2002, 2013/2014 and Christmas 2015) surface water runoff from this field and proposed site exit via the hedge and gateway into Gethin Place and hence onto the R53.

Gethin Place has no drains, residents have expressed considerable concern that any future development of this proposed site would enhance and increase the hard surface area. This would have the consequence of exacerbating any future flooding issues by increasing the rate and speed of water runoff. Additionally the proposed location of any future development of this site would have the effect of acting as a barrier to water draining from upper sections of the field. Essentially this would place any new development properties and properties adjacent to Gethin Place and St Marys Close at risk.

Whilst this aspect has been highlighted in the written response to the LDP, it is felt that there has been insufficient recognition of the potential ramifications relating to this issue, both within the LDP and Flood Management Plan. Whilst action is alluded to in LLO106 - last sentence - "as part of any local development plan". This statement does not however, give any indicators regarding what action would be required if such a development took place.

<p>Peter Chambers, Buckholt, Monmouth</p>	<p>I entirely agree with Transition Monmouth's comments on this in their January newsletter.</p> <p><i>Extract of Transition Monmouth's comments shown below, from web page:</i> http://www.transitionmonmouth.org/transitionmonmouth.org/News+Views.html</p> <p>Flooding hits road network</p> <p><i>This was the headline in the Beacon a couple of weeks ago. The article also informed us that the MCC Flood Risk Management Plan was out for consultation until 1 February – see http://www.monmouthshire.gov.uk/flooding. Well, that was the first we had heard of it (+ we have yet to find anyone who had). After discussion with everyone we could manage to talk to we responded to MCC with the following comments/requests:-</i></p> <p><i>We request that public meetings are held in Monmouth, Chepstow + Abergavenny at the very least, with appropriate Officers + Cabinet Members present, to be held before the deadline for the consultation process</i></p> <p><i>We are aware that this will be difficult, if not impossible, with the existing deadline of 1 February; we therefore request the deadline be extended</i></p> <p><i>We have noted the Prevention Measures as set out in Table 4.2. However, this is closing the stable door after the horse has bolted. We wish to see measures that stop floods happening in the first place by way of, inter alia:-</i></p> <p><i>Tree + other planting to make ground more porous + hence reduce run off</i></p> <p><i>Management of watercourses to reduce water speed</i></p> <p><i>Development of water holding areas</i></p> <p><i>Maintaining flood plains, + certainly stopping building on them with immediate effect</i></p>	<p>We have a very tight timescale and the final version is to be with Welsh Government by the end of February to meet both National and EU Regulation deadlines.</p> <p>We will take account of all comments we receive and have advised that we would still take comments after that and if they require amendments to the Plan will create an Addendum to the Plan.</p> <p>We do not see that the deadline stops further discussions on how the Plan can be delivered and are sure that wider discussion will be helpful as there is a role for all groups and individuals to play their part to help reduce flood risk.</p> <p>No amendment to the Draft FRMP is required from this comment.</p>
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	<p><i>We understand the problems cannot be solved by MCC alone but require inter-agency working involving NRW, EA + others. We would like MCC to take the lead in this + make Monmouthshire a flagship county</i></p> <p><i>Appropriate measures (there is no 'one size fits all' solution but see http://www.independent.co.uk/news/uk/home-news/uk-flooding-how-a-yorkshire-flood-blackspot-worked-with-nature-to-stay-dry-a6794286.html which will read you to further reading) would save MCC considerable trouble + money, + save residents from hardship + inconvenience</i></p> <p><i>We understand funding is available for such projects. The Vale of Usk RDP (which includes Monmouthshire) has £3 million available for feasibility studies which, if acceptable, would lead to access of much larger funds for implementation. There is also the 'Create Your Space Programme" whereby the Big Lottery Fund Wales has a total of £8.8 million to help communities make positive + sustainable transformation to their local natural environment. European funding is available through Pillar 2 with funds for farmers to fight flooding – see http://www.bbc.co.uk/news/science-environment-35375338</i></p>	
<p>Catherine Fookes. Hendre, Monmouth.</p>	<p>Dear Councillor Jones Re: Monmouthshire Flood Risk Management Plan</p> <p>In view of the depth of my concerns not only about the risk of flooding but also the effectiveness of the Council's consultation process I am sending you this response (with copies to other principal players) as well as submitting it through the prescribed channel for consultation responses.</p> <p>My most immediate concern is that the deadline for responses to the consultation should be extended so as give members of the public a genuine opportunity to make a contribution. As you say in your introduction to the Draft Plan, those involved have not worked sufficiently closely together in the past; and organizations and even individual householders will need to be</p>	<p>The Consultation has been wide, including publicity in the local media, circulation to Town & Community Council Clerks, organisations, utilities, other risk management bodies, adjacent Council's, libraries and one stop shops, as well as internally at all levels and all County Councillors.</p> <p>We have a very tight timescale and the final version is to be with Welsh Government by the end of February to meet both National and EU Regulation deadlines.</p> <p>The core objective of working with other Risk Management Authorities fits well with your suggestions of the wider working arrangements need to help deliver those aspects outside our powers and resources. This</p>

	<p>involved in tackling the problem. Surely this makes it all the more essential that there should be wide public awareness of the Draft Plan and that all concerned should have a genuine opportunity to submit their ideas?</p> <p>To be frank, it was not until very recently that I became aware of the consultation and I have met only the smallest handful of people who knew of it. I notice from the Council's website that the consultation appears to have been launched with minimal publicity in early January and the imposition of a deadline for comments of 1 February makes a worthwhile public response a virtual impossibility.</p> <p>Given the shared assumption that this is a vitally important matter in which the public should be involved to the maximum extent I would like to suggest that:</p> <ul style="list-style-type: none"> • the deadline for comments should be extended by at least three months • immediate steps should be taken to stimulate a far greater public awareness of the Draft Plan and the opportunities of contributing comments and suggestions • public meetings should be arranged and publicized in the major population centres of the County. <p>Turning now to the content of the Plan, I do not feel able at this stage to offer a full and detailed response. However, my initial reaction is that the report is chiefly concerned with low level maintenance issues and the handling of floods as and when they occur. What appears to be lacking are any substantial new proposals to prevent flooding from occurring in the first place. It is therefore disappointing that there is no discussion of measures that have proved successful in other areas such as tree planting and the maintenance of flood plains.</p>	<p>would include further work with the Wye Valley AONB, Wye and Usk Foundation, NRW's flood and forestry departments.</p> <p>Public Meetings generally tend to be negative but a workshop approach with a wide range of partners, including organisations like Transition Monmouth could help deliver a wider range of benefits than the FRMP itself. NRW have also developed an FRMP to cover the main rivers and the sea so would be key to any joint working. It is suggested we seek to arrange a broad based workshop on flood issues later this year, date subject to getting as many of the relevant organisations together as possible.</p> <p>No amendment to the Draft FRMP is required from this comment.</p>
<p>Jon Dunkelman, The Narth.</p>	<p>I am a resident of The Narth and I have a few comments on the draft Flood Risk Management Plan.</p> <ol style="list-style-type: none"> 1. You base the assessments of who and what is affected on estimates of a 1 in 30 or 1 in 100 or 1 in 1000 risk. It is clear that Climate Change is changing these 	<p>In response to the numbered items the following comments can be made:</p> <ol style="list-style-type: none"> 1. Climate Change is taken account of in the risk assessments and maps. 2 & 3. The LDP (Local Development Plan) produced by our Planning Colleagues has included a Flood Assessment for each site in the

	<p>estimates of risk. Are you using risks estimated some years ago? If so the plans will be unrealistic.</p> <ol style="list-style-type: none"> 2. In terms of measures to reduce run-off it seems to me that any new housing or commercial developments should include both extended non-paved areas and specifically rain garden features. 3. Stop all building on flood plains. 	<p>plan. In addition all planning applications must comply with Welsh Government Guidance in TAN15 (Technical Advice Note) covering development and flood risk. All applications also go to NRW for comment where main rivers or the sea are concerned or to our Highways Development Manager for ordinary watercourses and surface water.</p> <p>No amendment to the Draft FRMP is required from this comment.</p>
<p>Sarah Jones Senior Planning Policy Officer, MCC.</p>	<p>Just to confirm we have no additional comments on the content of the FRMP from the Planning Policy team, thank you for incorporating our original comments on the draft. The only minor point is that there is a reference to the 'Deposit' LDP in the list of documents consulted, it may be that the Deposit was available when you first commenced work on the FRMP, as we adopted the plan in Feb 2014 would it be appropriate to change this to Adopted Local Development Plan or omit 'Deposit'.</p> <p>I was also wondering whether it would be possible to obtain a copy of the mapping layers once the plan is formally published for internal use?</p>	<p>Note and amend the FRMP as follows:</p> <p>All references in the FRMP to 'Deposit LDP' to be changed to 'Adopted Local Development Plan'</p> <p>To be checked with EA and NRA re licensing conditions.</p>
<p>Mrs Sue White, County Councillor, Overmonnow Ward Monmouth.</p>	<p>At the Drainage meeting on 18th Jan, Hadnock office, Monmouth, we Monmouth Members plus the Ross Member, (who was born and lived in Monmouth, until he married and moved to Ross) spoke of Wonastow Road, You told us you had not been informed of the amount of surface water coming down the Wonastow Road, White Hill, and Red Hill all sitting on the LDP fields. I have sent information to you, Mr Ashworth, Highways officers and the planning Department have been told, with photographs to support the information, that Wonastow has a long history of floods, it has been reported in the local paper many times.</p> <p>So why is there so little mention, of surface flooding at Wonastow road and fields, in the Flood Risk Papers? I would be pleased to show you and other officers, what the site looks like</p>	<p>The comments are noted and we will investigate internally for the information that has been sent in.</p> <p>Add to the FRMP as follows</p> <p>MO106 Investigate further the surface water flooding in Wonastow Road, including White Hill and Red Hill and identify actions that can be taken to reduce flood risk.</p> <p>And the following additional text: Parts of Wonastow Road, particularly above the Link Road are at risk from surface water flooding from adjacent higher ground.</p>

	<p>now, and has done every winter, that the six generations the White family have farmed here.</p>	
<p>Nigel James, Clerk Devauden CC.</p>	<p>Devauden Community Council considered last night the draft flood risk plan that you have recently issued and would like to make the following comments:</p> <ol style="list-style-type: none"> a. They cannot see that it could be value for money to spend £10,000 on flood risk measures on the lane to the Gelli – your reference DE105 – since there is only one house that could be affected. b. They do believe that you should include flood risk measures on the road that goes down past Castle Farm – numbered R122 on the MCC highways map and running parallel with the B4293 from Devauden to Itton. <p>I would be grateful if this email could be passed to the appropriate department, and for an acknowledgement from that department.</p>	<p>Comments noted and we will review the assessment for DE105.</p> <p>Castle Farm is on the Route R84, rather than the R122. We will also add to the FRMP as follows:</p> <p><i>DE106. Investigate flooding issues at Castle Farm on Route R84 and identify any actions required</i></p>
<p>Claire Atkins, UK Business Resilience Support Manager.</p>	<p>I have spoken with the experts on this matter within National Grid and offer the following as part of your consultation...</p> <p>National Grid does have significant sites and assets in the area, (both Gas and Electricity Transmission). This plan does not appear to consider risks to energy utilities other than a statement that they will continue to work with critical ‘services’ but it’s not clear if this includes CNI.</p> <p>There is a welcome statement though under 2.3.4 “avoid creating additional risk by not developing in areas served by critical infrastructure which is in a flood vulnerable location” but again it’s not clear what is considered critical infrastructure.</p> <p>I hope this helps, please let me know if you need further information.</p>	<p>NG and other utilities have not provided locations of their critical assets for security reasons so we have been unable to include those. We understand that flood risk maps have been made available to the various utilities so they can make their own assessments.</p> <p>National Government made utilities aware of critical asset issues after the 2007 Floods where sub stations and local facilities could be made inoperable due to flooding, leading to other services failing, such as gas, telecoms, etc. A recent example was in Cumbria where when electrical power failed due to flooding, evacuation of hundreds of homes and a hospital (unaffected by flooding itself), was necessary as power had failed and could not restored for 3 days.</p> <p><i>No amendments are required to the Draft FRMP from the comments received.</i></p>

<p>Town Clerk, Monmouth Town Council, Shire Hall, Monmouth.</p>	<p>Monmouthshire Flood Management Consultation</p> <p>Monmouth Town Council's Environment Committee met earlier this week and were very concerned about the above report, which does not show any consideration of the surface water flooding that is very prevalent in Monmouth.</p> <p>As a result, we request you to extend the consultation period beyond 1 February 2016 to allow more time to address this problem properly.</p>	<p>We have a very tight timescale and the final version is to be with Welsh Government by the end of February to meet both National and EU Regulation deadlines.</p> <p>We will contact you again once the Consultation Responses have been considered to identify the locations of the issues that are causing concern.</p> <p><i>No amendments are required to the Draft FRMP from the comments received.</i></p>
<p>Bob Hayward, County Councillor, Dixton with Osbaston Ward, Monmouth</p>	<p>I would like to make the following points</p> <ol style="list-style-type: none"> 1. Paragraph 4.5 on page 26 clearly states that the responsibility for managing flood risk lies with the LLFA. 2. Surface water flooding from run off probably affects as many people in Monmouthshire as flooding from our major rivers but the definitions of what is a significant flood risk provided in paragraphs 3.3.3 and 3.3.5 trivialises the misery caused every year by surface water flowing from springs and surrounding hills during heavy rainfall. With our hilly topography it is unlikely that rushing flood water will ever reach a depth of over 300mm but 100mm of water rushing through a property causes misery. 3. Similarly 5000 People represents half the population of Monmouth but an estate like Rockfield or the proposed new Wonastow Road development is worth protecting or noting when floods are inevitable. 4. The table on page 132 of the report is inaccurate. The flooding from the Wonastow brook has not been totally resolved by the construction of the pumping station. It has been improved but flooding still occurs on a regular basis. 5. Flooding still occurs at Wyesham despite the flood alleviation scheme being built. A pre-feasibility scheme for Forge road/Osbaston road may have been completed but I am the local member and I am not aware 	<ol style="list-style-type: none"> 1. Noted 2. Noted 3. The figure of 5000 refers to density of population in a fixed area for the Preliminary Flood Risk Assessment completed 4 years ago and was prescribed by Welsh Government in their guidance for that piece of work. 4. We are not aware of any flooding of properties from the lower part of Wonastow Brook that was covered by the scheme, other than the occasional flooding of the road that will occur. We will contact you further to establish the locations of any property flooding. 5. There has been some further flooding issues in Tudor Road area of Wyesham over the Christmas 2015 / early 2016 period. These have been investigated and were caused by some run-off bypassing the cut off ditch and will be rectified by liaison with the land owner. 6. Recent issues that have arisen will be investigated and any actions identified that can be undertaken.

	<p>of it and flooding is a common occurrence so the mitigation has not been implemented.</p> <p>6. In addition no mention is made of the following a. There was a recent incident where water flowing from Agincourt Road in Osbaston and the fields adjacent to Highfield Road flooded several houses in the Berryfield Estate. Water flowing from Prospect Road in Osbaston ran through the gardens of Prospect Road and Duchess Road properties and flooded all but two of the houses in Duchess Road.</p> <p>During heavy rain Duchess, Prospect and Beaufort Roads are subject to flooding from water from springs. Several properties on the lower western side of the road have been provided with sandbags to prevent this water flowing into the houses.</p> <p>7. The report states on page 26 that the Council has agreed to consider implementing a culverting policy and Appendix 6 is a draft of that policy. It states that we will not allow culverting long sections of watercourses and also that all MCC staff and planning officers will be made aware of the policy. We are presently proposing to allow the developer of the Wonastow Road site to culvert a long section of the Wonastow brook (which already floods) and furthermore it is proposed that MCC maintain this culvert against the policy which says the developer should maintain the culvert.</p> <p>I trust my views will be taken into account.</p>	<p>We have proposed a culverting policy and subject to comments and approval of the FRMP it will become Policy, but it is not yet Council Policy. Even then, there will need to be exceptions where culverting outweighs the disadvantages. The site at Wonastow Road comes under the Lower Wye IDD's jurisdiction, not MCC's, and they have agreed the culverting, although they have discussed and agreed their responses with MCC. The Draft Culverting Policy does not say that "the developer should maintain the culvert" but all culverts are the owner's responsibility. I believe that most of the culvert at this location will be under the new highway which is to be adopted, as such the culvert will be part of the highway adoption and therefore maintenance will lie with the Council in this particular case once the adoption is completed.</p> <p><i>Amend the FRMP to add the following:</i> MO107. Investigate the surface water flooding events that occurred in the Osbaston area over the Christmas / New Year period of 2015/16, including Berryfield Estate and Duchess, Prospect and Beaufort Road.</p>
<p>Carolyn Ovenden, (Chairman, Mathern Community Council and Community Councillor for Mounton village).</p>	<p>Please note that the Flood Risk Management Plan document failed to download to the Clerk in time for it to be discussed at the last Community Council meeting. These comments are my own and do not represent the opinions/comments of the Council as a whole.</p> <p>Following the heavy storms this week, beginning 25th Jan. 2016, the following observation have been made by myself or reported to me:</p>	<p>Noted. The FRMP is a very large document because of the plans it contains and was intended to be read online.</p>

1. At least 4 Cars have broken down at night under the motorway bridge in Mathern (see the picture in the report) due to depth of water accumulated here. All these engines failed to re-start and the cars had to be towed away – engine damage unknown. At least one driver stated that, because of the darkness under the bridge, he did not see the flood water.
Problem could be improved by positioning a light under the bridge. It does not however resolve the problem that householders living near Mathern Church would effectively be cut off by the floodwater unless drainage were to be improved here. The road is a dead-end.

2. Mounton Brook overflowed in Mounton village on the afternoon of Wednesday, 27th Jan. 2016. Culverts were unable to cope with the volume of water and the lane through the village was flooded with up to 50cms of rushing water. The water level on the south side of Mounton Church wall was 15cms before the brook broke its bank (measured by myself). It was too dangerous to re-take this measurement afterwards due to the strength of flow. Water was coming up out of the sewage covers throughout the village before the roads were overwhelmed.

 The one house mentioned in the Plan with a “medium” risk of flooding in the Mathern area is presumably Church Cottage, Mounton. This dwelling is, in fact, at high risk. The householders have had pumps installed to prevent another catastrophic flooding incident like the one they suffered in 2012 when the house was uninhabitable for 6 months. Without these pumps, it would again have been overwhelmed.

 Once the water had receded, Mounton village (popular with walkers and cyclists) became a mud-bath – and remains so, the lane being slippery and dangerous to traffic.

3. The lane past Mathern Mill is currently in a similar extremely muddy state due to the overflow of Mounton Brook.

Noted. Add to FRMP as follows:
MA105 Investigate potential solutions to the problems of surface water flooding beneath the motorway bridge at Mathern

Landowners are responsible for watercourses that pass through their land and the Council's role is to deal with consents for works and to ensure owners keep watercourses clear of obstructions, etc. We have powers to carry out works and have and will do so where appropriate and where Welsh Government grant can be obtained, to avoid or mitigate flooding of properties. We do not dredge watercourses and any proposals to do so need to meet the requirements of the Water Framework Directive covering the environmental and habitat issues. The FRMP does deliberately raise the emphasis of owners taking responsibility for defending their own properties as it is their property. In addition, despite the comments raised about increases in Council Tax, the overall funding to the Council has decreased dramatically, particularly in the flood and land drainage areas and our resources to assist residents has diminished and are likely to diminish further.

Highway issues will be raised with colleagues in Highways Operations

	<p>Mounton Brook causes huge problems in times of heavy rain. Most nearby landowners do their best to keep it clear but receive no support or advice from either MCC or NRW. Heavy boulders have been strewn along its length for many years and many of the problems could be alleviated by dredging along the whole length of the brook. This would allow the water to flow much more freely into the Severn.</p> <p>Your plan seems to be only concerned with the main transport arteries (railway, A48). Whilst this is obviously very important, it does not reflect the problems of local residents and local roads. In my opinion, it also attempts to shift the responsibility of dealing with the situation away from both MCC and NRW. This, I believe, is unacceptable and, especially in the light of the recently announced rise in Council Tax.</p> <p>Monmouthshire County Council should be prepared to do more for the residents who actually live in Monmouthshire, rather than concentrate on those who are passing through the county.</p>	
<p>Anthea Dewhurst, Monmouth Town Councillor, Osbaston with Dixton Ward, Monmouth.</p>	<p>As a resident and Town Councillor I feel that I must make the following comments to the Flooding Consultation</p> <p>MONMOUTH TOWN <u>*MO 102 Raising Awareness of landowners</u> The Osbaston area of Monmouth is built on a steep hill predominantly of heavy clay (well known historically for its brickworks) This means that some residents have been 'flooded' after heavy rain from surface run-off above them, rather than rising river levels of the Monnow.</p> <p>It is essential that local people and Planners realise the importance of each area absorbing the rain that falls on it. e.g. The material used in each driveway has huge significance to the housing below on our steep slopes. Rainwater channelled out of sight via the road drainage system quickly raises the river levels too. The amount of extra tarmac due to infill development has an unusually dramatic consequences on this landscape.</p>	<p>Noted and the purpose of raising awareness is a key issue so that property owners can take precautions to minimise their risk of being flooded.</p>

MCC Highways dept.and MCC Planning dept *need to be much more pro active in raising awareness* to each individual making choices about their property, whether it is a new or established one.

*The Wonastow Road (including The Industrial Estate West) is classed as AT RISK of flooding. Meanwhile the 400 housing development is proceeding on the slopes above. Coping measures here consist only of vast attenuation lakes. Monmouth has been forced to accept this development which seems to be a perverse battle against gravity.

What *must not be allowed* now, is the covering of the roadside stream which drains the existing landscape. This is due to be culverted imminently...AGAINST clear advice in your report. For centuries this stream alongside the Wonastow Road channelled water effectively and contributes to the character of the area, bringing birds, dragon flies etc into the town. Very little life will survive in long tunnels of unlit water, while new problems of access to the inevitable blockages, will be introduced!

Please can you let me know who to contact in order to voice my concerns, with many others (including Civic Trust, Gwent Wildlife, Transition Monmouth) about the land management of the farmland bordering the Monnow and Wye? How are the measures that prevented flooding this winter in **Pickering** to be learnt from, here? I do not need to specify the range of planting and absorption methods to you, I am sure. The Wye Valley AONB could perhaps host such a conference if MCC were not able?

*Floodplain at confluence of Monnow and Wye. Chippenham Meadow aka Two River Meadow
This area floods most winters...a natural slowing of excess water and not in need of prevention, of course. I am not clear why this area is not marked in blue

*Mitchell Troy Area

This site is within the Lower Wye Internal Drainage District (IDD) - now part of Natural Resources Wales - area of jurisdiction for land drainage and not MCC. They have however discussed with us their responses to the proposals and how to mitigate the impact of the development. Culverting of the Wonastow Brook has been agreed by the IDD to enable the access road to the development to be built. As such the culvert will be adopted as part of the highway adoption and will become MCC's responsibility.

Any representations should be made to the Planning Department of MCC.

This is the confluence of two rivers and these are the responsibility of Natural Resources Wales. This FRMP only deals with surface water and ordinary watercourses. Main Rivers and the Sea are covered in a separate Flood Plan being produced by Natural Resources Wales and the Environment Agency as referred to in the Foreword and Sections 2.4 and 4 of our FRMP.

Typo noted and the FRMP will be corrected to show this.

	The road named as Jungle Street is,in fact Jingle Street	
Val Smith, County Councillor.	<p>OK by me, you have put a lot of work in. Comments on M.C.C. need to exercise our duties Member participation 5.2.2 bit thin perhaps?</p> <p>Was unaware of Wye & Usk Foundation Not a criticism of yourself, but all words and few concrete actions possible with no real Budget, how do we protect – electricity, gas, health facilities, water. M.C.C. Planning decisions questionable at times I feel.</p> <p>Thanks for document, do you want it returning, apologies for my scribbles if you do. Real positive for me you refer to Woodside, perhaps we can get signage for, instead of Usk, very parochial me.</p>	<p>Noted</p> <p>Utilities are responsible for their protecting their infrastructure not MCC.</p> <p><i>No amendments are required to the FRMP from these comments</i></p>
Jim Burdon Brooklyn Cottages, Crick,	<p>Apologies I realise now that the consultation period ended Feb 1st - but hopefully you can consider my comments anyway. I have read through a good chunk of the consultation document and have a couple of questions in general terms, and specifically in connection to the Caerwent Community Council Area;</p> <p>1 - Once it is adopted, what is the status of the flood zones? As the introduction notes the document strives to illustrate the likelihood of flooding from rainfall for a number of scenarios, but it appears to be a record of 'where the water goes now' has there been any attempt to document 'where we want the water to go'?</p> <p>Our own property flooded as a consequence of rainfall in 2012 (and has been close every winter since) the FRMP now shows a flood zone in the low spot of the field behind our house, I am concerned that this now appears to legitimise this rather than challenging how the management of surface water has been amended over recent years. Has any attempt been made to</p>	<p>The flood risk areas are the areas at risk of flooding from surface water and ordinary watercourses. They have no status as such but are where there is a risk of flooding. There are no plans or intentions of altering these, but we expect the Environment Agency and Natural Resources Wales to provide updated versions at appropriate intervals.</p> <p>The area around you is part of a flood risk area and this is not about whether it is legitimising it, it is a statement based on assessments carried out by the Environment Agency and Natural Resources Wales. These are determined by rainfall and local geography. I accept that some of the geography is due to man-made works going back many centuries, for example Caldicot Castle's construction has altered the natural flows in the area, as well as more recent works. This lower part of the Neddern Brook is its flood plain.</p>

	<p>determine causes of flood zones and whether or not their locations are desirable?</p> <p>2 – Because of the above approach there needs to be recognition that the flood zones shown are hugely variable and effectively determined by the actions of landowners ‘upstream’ – for example I enclose a copy of a historic map which shows a pond and access track into MOD Caerwent, these have been removed therefore potentially affecting the areas that are now shown as Flood Hazard.</p> <p>3 – Despite the above I think the document is much needed and very good. I think there should be more emphasis on the Community/Town Councils to record local flooding and obtain witness statements to inform future iterations to enable a greater degree of management in the future.</p> <p>As stated, I think that the introduction of a FRMP is a welcome one and I look forward to reading more in the future.</p> <p>Kind regards</p>	<p>Any and all local information assists the overall understanding of where there are flooding issues and provide a background to any measures to mitigate that flooding.</p> <p><i>No amendments are required to the FRMP from these comments</i></p>
<p>Charles Eatwell.</p>	<p>Castle Lea/ Castle Lodge, Caldicot</p> <p>I wrote to our town council regarding my concern at the potential for flooding of houses in the above Caldicot housing estates. Gail McIntyre responded by suggesting that I forward my comments to your organisation as the lead on flood planning covering our area.</p> <p>In my opinion the risk to our properties is in essence due to the limited capacity of the Neddern to carry away the volume of water produced during periods of prolonged and heavy rainfall.</p> <p>This leads to flooding of the fields at the rear of the castle and the football field (Caldicot FC), the latter clearly having the potential to ingress into our properties. Not so long ago the</p>	<p>Bunding is merely one effective method of creating a flood defence to properties. Before any defence works would be considered it would be necessary to survey the area to identify the extent of any defence works that might be considered. For example, if one property were bunded on the Brook side it could still be flooded from flood water running around the side. If it were bunded all around the property it may increase flooding to adjacent properties and it may also mean that the area within the bund, ie, the property, may flood from its own rainfall runoff. Therefore the full extent and height of any defence would need to be clear, what the effects would be on any other undefended areas,</p>

	<p>football field was completely covered with water and not too many metres from the adjacent houses.</p> <p>Having watched a recent report on the disastrous flooding in Cumbria I noted with interest that a monastery in that area had been protected by so called bunding (high banks) which had been constructed centuries ago.</p> <p>As a layman I wonder if this low tech approach would offer the prospect of protecting houses in these estates, in practice constructing bunds one between the football field and Castle Lea and another between the field used by campers and Castle Lodge? Regards</p>	<p>the space / opportunity to construct any defence, the costs and who would meet them, etc.</p> <p>An alternative option that is much less costly is to consider what is called PLP or Property Level Protection. This involves installing either flood boards that can be put in place when floods are forecast or more significantly changing to specially strengthened / sealed doors that open outwards that will withstand floods, sealing air bricks, and all other low level items that might allow flood water in. Costs are typically about £5000 a property whereas a bank or flood defence could be 5 to 10 times that.</p> <p><i>No amendments required to the FRMP from these comments</i></p>
<p>Michelle Russ, Rainscape Co-ordinator, Dwr Cymru / Welsh Water.</p>	<p>DRAFT FLOOD RISK MANAGEMENT PLAN – MONMOUTHSHIRE COUNTY COUNCIL</p> <p>Thank you for consulting on the draft Flood Risk Management Plan (FRMP) for Monmouthshire County Council.</p> <p>These comments are from Dŵr Cymru Welsh Water, the statutory water and sewerage undertaker that supplies over three million people in Wales and some adjoining parts of England. We are the UK's only non-shareholder utility company, with all gains going to our customers. We provide essential public services to our customers by supplying their drinking water and then carrying away and dealing with their wastewater. In this way we make a major contribution to public health and to the protection of the environment. Our services are also essential to sustainable economic development across our operating area.</p> <p>Dŵr Cymru has responsibilities under the Flood and Water Management Act 2010 as a Risk Management Authority (RMA) in addition to being responsible for managing sewer flooding and reservoirs in our area. We are committed to working with other risk management authorities to ensure that the risk of flooding in our area is managed effectively in order to provide maximum protection to our customers, the environment and the wider economy.</p> <p>We generally support the contents of the draft FRMP and the objectives that are set out. We are keen to continue to work closely with you as the objectives in the plan are delivered and work in partnership where appropriate.</p> <p>We are pleased that the FRMP acknowledges the need to protect key infrastructure. As a statutory water and sewerage undertaker, we are very mindful that our customers –</p>	<p>Comments Noted.</p> <p><i>No amendments required to the FRMP from these comments</i></p>

domestic and commercial – are reliant on the essential water and sewerage services that our sector provides.

Article 7 of the Floods Directive requires that flood risk management plans should take the Water Framework Directive's (WFD) environmental objectives into account and requires coordination in the application of the two Directives. We are pleased to see that your FRMP references WFD, and shows how the objectives of your FRMP align with the Severn River Basin Management Plan.

From Dŵr Cymru's perspective, it would be an inefficient use of our customers' money if we reduced our impact on particular waterbodies while other pressures, such as inappropriate flood defences, continued to prevent those waterbodies from reaching the good status that the WFD requires.

We are pleased to note the inclusion of information on how you propose to develop your asset register and system asset management plans. It would be useful if we could receive information on your assets as part of our data sharing responsibilities in order for us to better understand the interaction between all drainage infrastructure in the county.

On page 70 you have made reference to an issue at Longhouse Barn, Goytre in relation to a surcharging surface water sewer. For information, we are currently undertaking further investigation into overloading of the foul sewer network at this location to assess the potential for a solution to be delivered at a later date.

We are keen to continue to develop the good working relationship we have and work with you to keep customers informed of responsibilities for flood risk in the county and also when responding to flood incidents.

Please do not hesitate to contact me if you would like to discuss any opportunities for partnership working, or how Dŵr Cymru Welsh Water can support you further in the delivery of this Plan.

Yours Sincerely,



Michelle Russ
RainScape Regulation Manager