

Local Flood Risk Management Strategy Public Consultation
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Respondent	Date	Comment	LLFA Response
Environment Agency	04/08/2025	The Environment Agency is the main environmental regulator in England. As your enquiry relates to Wales, please direct your enquiry to Natural Resources Wales (NRW). You can find their contact details on their website:	No amendments required.
Natural Resouces Wales - Comments on the Local Flood Risk Management Strategy	26/09/2025	We welcome the opportunity to comment on your LFRMS and FCERM Local Strategy Measures and are pleased to see the alignment with the National Strategy Measures, as well as our own Flood Risk Management Plans. Within NRW's FRMP we have set out our desire to implement catchment-based approaches and work with partners as one of our key priorities, we have also set out a measure focussed on working in collaboration with other risk management authorities to manage flood risk and deliver improved ways of working.	Noted that relevant plans meet shared goals.
		2.1 Figure 2 Suggest inclusion of the below to the Local section: • MCC Green Infrastructure Strategy • Monmouthshire's Nature Recovery Action Plan (NRAP) Suggest inclusion of the below to the regional section: • South East Wales Area Statement • Gwent Public Service Board Wellbeing Plan and Assessment Gwent Public Services Board	Reference and detail to the below have been added following similar comments from MCC's GI Team: • MCC Green Infrastructure Strategy • Monmouthshire's Nature Recovery Action Plan (NRAP) Reference and detail to the below have been added • South East Wales Area Statement • Gwent Public Service Board Wellbeing Plan and Assessment
		2.1 Table 1 Suggest inclusion of the Civil Contingencies Act 2004	Reference and detail added
		3.1 Figure 3 Suggest that Internal Drainage Districts are noted separately as the risk of flooding is distinct by the nature of the low-level land in the area, with the suggestion to contact NRW. More information on the maintenance of the Gwent Levels IDD's are available at How our Internal Drainage District (IDD) team manage the Gwent Levels - Natural Resources Wales Citizen Space - Citizen Space (cyfoethnaturiol.cymru)	Row added relating to the Gwent IDD. Hyperlink added as footnote in Chp. 5.1
		3.2 Communities at Risk Register We have information about the CaRR on our webpage if you'd like to refer to more information: Natural Resources Wales / How we plan and prioritise our flood risk management work The Climate Change Community at Risk Register has also been circulated to LLFAs. Please contact us if you have any queries.	Hyperlink added
		3.2 NRW's FRAW Map The risk level is different for sources of flooding: For river flooding, medium risk means that each year, this area has a chance of flooding of between 1 in 100 (1%) and 1 in 30 (3.3%). Low means that each year, this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%). For surface water and small watercourses flooding, medium risk means that each year, this area has a chance of flooding of between 1 in 100 (1%) and 1 in 30 (3.3%). Low means that each year, this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%). For sea flooding, medium risk means that each year, this area has a chance of flooding of between 1 in 200 (0.5%) and 1 in 30 (3.3%). Low means that each year, this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 200 (0.5%).	Additional wording to reflect this included in Chapter 3.2

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Section 3.3.3 In addition to permissive powers NRW also has a regulatory role to ensure proposals on main river watercourses • Do not increase flood risk and where possible contribute to reducing it. • Works are not detrimental to our flood and coastal erosion risk management assets • Works avoid environmental harm Where main rivers are affected by proposals to manage flooding a Flood Risk Activity Permits (FRAP) may be required from NRW. Further guidance available on this link Natural Resources Wales / Flood risk activity permits In some circumstances a FRAP may not be required for certain flood risk activities if the applicant is a 'protected undertaking' (as defined in Schedule 22 of the Water Resources Act 1991), or a Risk Management Authority (i.e. Natural Resources Wales (NRW), a lead local flood authority, a water company or a highways authority). Flood risk activities (e) to (k) do not require a permit where they are carried out by a protected undertaking or a Risk Management Authority for the sole purpose of managing a flood risk.	Covered in sufficient detail in 5.1
5.1 Table 11 In regard to reservoirs, NRW's role is to perform as the enforcement authority for the Reservoirs Act 1975, whilst we seek to ensure reservoir owners observe and comply with the law, it is the owner that holds the liability to minimise that risk as low as reasonably practicable. Suggestion that the text is amended to 'Reservoir owner' rather than NRW. Reservoir flood plans are not a statutory requirement. We provide guidance and hold an expectation that the guidance is applied by owners. Natural Resources Wales / Prepare a reservoir flood plan We also have information on our website about Owning a watercourse.	Note added to table as per suggested text 'Reservoir owner' would not be appropriate in this table as private owners are not a Risk Management Authority. A row has been added as suggested into Figure 3 'Sources of Flooding and Who to Contact' Noted.
5.2 Other Responsible Partners – Riparian owners We also have information on our website about Owning a watercourse.	Hyperlink added
6.2 Monmouthshire's Strategic Objectives Local Strategy Objective 5 A LFRMS has the opportunity to be detrimental or beneficial to implementing WFD mitigation measures. It would be beneficial to consider WFD failures due to physical modifications, and the issue/opportunity for the LFRMS to make efforts address this. As well as reaching Good Ecological Potential for those sites designated as a Heavily Modified Waterbody.	Such work will be undertaken through the delivery of the relevant measures and actions, as well as work by others in MCC. No changes or additions considered necessary.
7.3.3 Measure 2 SFCA We suggest including timescales of the Measure and how that correlates to the current status of the LDP so it is clear when the updated SFCA will be available. We are aware Monmouthshire County Council (MCC) consulted on its Deposit Replacement Local Development Plan for the period from 2018-2033 in December 2024.	Timescales are shown to be short term i.e years 1-3
7.3.3 Measure 3 SuDS Approving Body (SAB) We have noticed that implementation of SUDs policies can conflict with protection of SSSI features on the Gwent Levels SSSIs. Recommend this issue is investigated further with a view to resolving conflicts in order to protect and enhance nationally protected sites and biodiversity. We feel that there is scope within the SUDS guidance to make more nuanced decisions. Particularly where there are exceptional or unusual circumstances, or where evidence is provided by other public bodies/consultees. Strict adherence to the Priority Levels is not required in these circumstances, particularly where better outcomes for the environment can be achieved by other means. Potentially this may be beyond the scope of the consultation, but where Enforcement may be needed, the strategy mentions enforcement powers but does not explain: • How MCC will identify non-compliance. • What steps will be taken (e.g. stop notices, penalties). • How enforcement will be coordinated with planning enforcement. No detail on: • How MCC will inspect SuDS post-construction. • Whether there will be routine audits or risk-based inspections. • How maintenance responsibilities will be tracked (especially for private SuDS).	The summary of the SAB functions are proportionate to the Strategy, further more detailed aspects of the SAB's role can be provided upon request

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	7.3.3 Measure 4 Flood Awareness We welcome this measure towards continuing to raise awareness of flood risk within communities. We recently completed a pilot social media campaign as Gwent Public Service Board to raise awareness of the free flood warning service. We would like to complete some further campaigns across Gwent and suggest including the PSB as a delivery partner. Please get in touch if you would like to find out more at southeast.as@cyfoethnaturiolcymru.gov.uk.	Reference to the Gwent PSB added
	7.3.3 Measure 5 Flood Forecasting & Warning It may be appropriate to reference the 5-day flood risk outlook for Wales, as the public facing version of the Flood Guidance Statement.	Reference and link added
	7.3.3 Measure 11 Flood and Drainage Asset Database and Measure 12 Asset Management and Maintenance Plans If this data hasn't already been submitted in your recent submission to the National flood Asset Database (NAD), we recommend it is prepared for submission, and in the future as it is generated, as per Annex IV of the Grant Memorandum and Measure 7 of National Strategy for Flood and Coastal Erosion Risk Management in Wales. Where Lead Local Flood Authorities need to send us a set of data when they • build a new flood scheme • change, maintain or update an existing flood scheme, asset, or group of assets We need this data to update: • National Flood Asset Database and accompanying map • Flood Risk Assessment Wales (FRAW) map • Flood Map for Planning (FMfP) It therefore may be worthwhile to add in this requirement to the description, or by adding NRW as a partner. More information is available at Adding your flood assets (Grant Memorandum - Annex IV)	Reference to the National Flood Asset Database and NRW as a partner added
	7.3.3 Measure 16 Strategic Flood Risk Area Management We welcome reference to working in a catchment approach and better understanding of local flood risk. In all cases we recommend discussions at an early stage with our local operations team, who will be able to advise on any modelling requirements, NRW support/involvement timescales, latest NRW or industry guidance and how to submit data to us. We provide the following advice on developing suitable flood risk models at Developing hydraulic models for flood risk. Information on adding or updating your flood assets is available at Adding your flood assets (Grant Memorandum - Annex IV). Changes to risk data following the business case model development and scheme delivery can be found via Natural Resources Wales / Challenging our flood maps.	Comment noted.
	9.1 Funding options – Coastal funding Point of clarity – only Local Authorities were eligible for CRMP funding, not NRW.	NRW reference removed
Natural Resources Wales - Comments on the Flood Action Plan	It would be helpful to see any links to relevant Shoreline Management Plan Actions within the Flood Action Plan.	Additional Action Mon 37 added Work with the Severn Estuary Coastal Group in the development and implementation of the Shoreline Management Plan.
	Mon 3 We welcome reference to working together on Skenfrith Flood Alleviation Scheme.	Comment noted.
Natural Resources Wales - Comments on the Strategic Environmental Assessment Report	General We are generally supportive of the strategy, and the decision to take option 3 of the alternatives to Manage and reduce local flood risk. We do have a number of further points for further consideration including more emphasis on SuDs, land use and agriculture, geomorphology and opportunities to manage the upland areas within the catchment. Any specific proposals, particularly hard defences, will need to be carefully assessed at project stage. This could have been emphasised more in all the documents, but we welcome mention of this in recommendations and conclusions. We also welcome the emphasis on integration of the different measures and need for effective management of Actions including 'the assessment of proposals for their potential positive and negative environmental effects before implementation'.	Comment noted.
	3.5 Future Flood Risk The number of properties at risk of flooding at the local authority level for flooding from the sea, rivers and surface water for 2024 and 2120 (considering climate change) are available at Properties at Risk of Flooding 2024.	Stats added to 3.5.

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4.1 Environmental Topics Scoped in Reference to Air Quality could be made and justification as to why it was not scoped in. • Any flood alleviation plans that could impact traffic routes would need to consult the Local Authority Air Quality Management Plans to ensure that changes in traffic flows do not increase air quality issues. • There is a current trend in electric vehicles which should also contribute to reduced NOx emissions in the communities. • Please refer to Environment (Air Quality and Soundscapes) (Wales) Act 2024 Law Wales and The Clean Air Plan for Wales (gov.wales) which references considerations for people and health, including population groups in the ‘most’ deprived areas being at greater risk.	Added to section 4.2 Acknowledges there are no AQMAs nearby.
5.2 Landscape and Visual Amenity We welcome the reference to the Landscape Character Areas. Please refer to all layers of LANDMAP, Landscape and a Changing Climate to update the evidence, issues and opportunities section	Summary of LANDMAP classifications, including a map and definitions added at section 5.2.1.
5.3 Biodiversity (include flora and fauna) Specific comments relating to existing draft: • Table 5.1 only covers a small proportion of protected sites, although the title does already say it details several of them, suggest further clarification that it is not a complete list. • On page 21, it should mention that as well as the Lesser Horseshoe Bat feature, the Usk Bat Sites SAC also has habitats that are relevant to flood risk management, including bog habitat which directly feeds the River Usk (although most of this habitat is in the Powys part of the hill). We note the habitats for Usk Bat Sites SAC are referred to in the HRA. • Suggest that less detail is needed about GCR features, and more of an overview of the SSSIs could be included in the main body of the report in addition to the list in Appendix 3. • 5.3.3. HRA – Unclear if the Tidal lagoon proposal is relevant to include, unless it is a live project. • 5.3.4 The Summary of Key Issues could be expanded to consider impacts from the measures proposed in the plan (issues and opportunities) General comments and area with further consideration suggested: • We welcome reference to the Section 6 duty • Suggest consideration that better management of upland habitats generally, both SSSI areas and non-SSSI land, might help alleviate flood risk by holding more water in habitats such as bog, which might result in a slower release of water into the rivers etc. Would also help alleviate impact of future droughts • Monmouthshire Local Nature Partnership Nature Recovery Action Plan and Greater Gwent Nature Recovery Action Plan should be considered • Consideration is needed on Ecosystem Resilience and the DECC framework - Diversity, Extent, Condition & Connectivity of ecosystems. Connectivity of habitat / networks needs including in particular. It should give an overview of all habitats present and recognise the importance of watercourses as green infrastructure. • Potential impact to fish should be explored further, and to note Section 7 Species from the Environment Wales (2016) Act, Brown Trout, European Eel and Atlantic Salmon should be included. There are several legislative drivers which there are statutory requirements to have regard and should be highlighted in the SEA – SAFFA 1975, Eel Regs 2009 and Environment Wales Section 7 species. This is in addition to the WFD requirement to ensure all aspects of the water environment are protected and, where necessary, restore water bodies in order to reach good status, and to prevent deterioration. • Gwent Green Grid Partnership and relevant projects should be referenced • Should consider coastal squeeze • Should consider Invasive Non-Native Species (INNS)	Updated within 5.3.
5.4 Water environment • It is incorrect that “Over 90% of the waterbodies are affected by physical modifications while the second contributor, pollution from rural areas, affects approximately 50% of waterbodies” Within Severn RBMP 2021_2027 Summary 2.5.1 the graph presents numbers of waterbodies and not percentages. • It would be more appropriate to use figures of flood risk that are Monmouthshire specific. The number of properties at risk of flooding at the local authority level for flooding from the sea, rivers and surface water for 2024 and 2120 (considering climate change) are available at Properties at Risk of Flooding 2024. Figures are also available within the draft LFRMS. • Not enough emphasis has been placed on geomorphology and the opportunities to restore natural processes, which would be relevant to consider given the LFRMS Measure for NFM. For instance, the way the river Usk behaves at Llanellen and the Bryn. Protections and restoration of geomorphology is essential to building or resilience of ecosystems. Given the significant urban pressures geomorphology consideration is essential for climate and ecosystem resilience. (related to heavily modified water bodies): One of the primary Reasons for failure of waterbodies under WFD in Wales is the physical modification of watercourses and the disconnection with their floodplains and riparian corridors. Physical modifications are not just about fish passage but is a core element to the function of watercourses alongside water quality and quantity. Without restoration of geomorphology habitats for fish and invertebrates cannot be sustained or present or can lead to increased erosion and deposition which can impact flooding	Updated within 5.3.
cont and water quality. There is a summary in the RBMP on physical Modifications and Morphology Restoring natural processes and river restoration opportunities should be mentioned. • Heavily Modified Waterbodies (HMWB) in MCC should be included in the baseline information. Some waterbodies might be classified as a HMWB as a result of their function as a flood risk asset. These might provide valuable social and economic benefits which it is vitally important to protect, so they have been designated as such under Article 4.3 of the WFD. There can still be opportunities to deliver mitigation measures in HMWB to help achieve Good Ecological Potential. Where FRMP measures are delivered in a HMWB, they must seek opportunities to deliver mitigation measures identified for the HMWB. • Opportunity Catchments (OpC) have been agreed as the delivery mechanism for the third cycle River Basin Management Plans (RBMP) (2021-2027). The focus of OpC is to maximise multiple benefits for waterbodies, health and wellbeing, delivered through partnership working. OpC are a delivery mechanism to integrate RBMP with other work streams and to deliver the Natural Resources Plan priorities, such as delivery through nature-based solutions. Area Statements provide an important local steer having identified the local challenges and opportunities for each area. The Central Monmouthshire Opportunity Catchment Project (CMOC) should be referenced (WFD) - uses a range of long-term natural solutions, that will help improve water quality in the Rivers Usk and River Wye catchments and increase the resilience of local ecosystems. • Monmouthshire and Brecon Canal should be referenced 5.4.2 Water Resources • Natural Resources Wales is the regulatory body responsible for managing water resources in Wales. We need to balance the water needs of the environment, society and the economy, both now and in the future. We face a number of challenges which will have an impact on our water resources and the ways we manage them. These include population growth, an increased demand for water and climate change.	Updated within 5.4.

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cont The strategy does not focus directly on water abstraction as a standalone theme, it does address water resources within its flood risk framework, emphasising sustainable drainage, catchment-wide planning, and environmental protection. While it does not detail abstraction licensing or volumes, it supports the broader goals of sustainable water use, quality improvement, and resilience to climate change. • The catchment-based approach taken by the strategy and promotion of natural flood management and nature-based solutions will both influence water flow and a more sustainable way of managing water resources. • The Water Act is the legislation that drives the management of our water resources. Inclusion of other relevant plans and policies needs consideration including our Abstraction Licensing Strategies (ALS), this strategy assesses applications to abstract and/or impound water against local water availability. • Abstraction Licensing Strategies Monmouthshire sits across two of our Abstraction Licensing Strategies – the Wye and the Usk. These Licensing Strategies set out how water resources are managed in the catchments. They provide information about where water is available for abstraction and an indication of how reliable a new abstraction licence may be. Wye Abstraction Licensing Strategy: A licensing strategy to manage water resources sustainably River Usk abstraction licensing strategy July 2017 (cyfoethnaturiol.cymru) The most significant abstraction pressure in this area is public water supply. In the Usk abstraction for this purpose accounts for ~94% of the total annual abstraction. Aside from public water supply, the main pressure on water resources in the catchment is from agricultural businesses where water is required for trickle and spray irrigation and other agricultural uses. Due to the ecological importance and environmental designations of the River Usk, River Wye and River Severn estuaries NRW has an obligation to protect their environmental needs including their fresh water flow requirements. Estuaries are not included in the CAMS resource assessment as tidally influenced waters cannot be assessed in the same way as inland waters. Surface water abstraction from the Estuary is not considered to require the same level of protection as that required for the area upstream of the tidal limit. This means that water may be available for abstraction at a wider range of flows. The tidal limit of the Usk Estuary is at Newbridge-on-Usk and the tidal limit of the Wye is at Bigsweir Bridge. • Licences affected by flooding Consideration should be given to abstraction licences identified as being subject to flood risk surveys and reports should be carried out to identify the potential damaging effects of flooding and what measures could be implemented to reduce the flood risk and impact on the water. We would need to know if there are any licences likely to be affected by flooding or any of the measures outlined. • New licences required for flood defence measures We would also need to know if there are flood defence activities or any new flood defence measures that might require an abstraction licence – temporary or full i.e.. dust suppression for construction of new flood defences. The same would apply to the potential requirement for any impoundment licences. A licence may be required for these activities. • Licence requirements – abstraction If more than 20 cubic metres of water is to be abstracted per day from a surface water source (e.g. stream or drain) or from underground strata (via borehole or well) for any particular purpose then an abstraction licence is likely to be required. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. Abstractions from these sources under 20 cubic metres per day do not require an abstraction licence. • Licence requirements – impoundments If a watercourse, ditch or stream is to be impounded then an impounding licence is likely to be required. Natural Resources Wales / Find out if you need a water abstraction or impoundment licence • Small impounding structures policy. There may be opportunity for any works to come under our low risk impounding policy, there is further information on our website: Natural Resources Wales / Low risk impoundments	Specific construction measures not known at this stage and therefore cannot cover abstraction licenses and regulations etc.
cont 5.4.3. Water Quality • Suggest update of “NRW identified that 88% of the River Usk’s waterbodies failed to meet the required phosphate target and 67% of the River Wye failed to meet the required phosphate target (MCC, 2023)” There is a more recent 2024 assessment Natural Resources Wales / Assessment of water quality in Wales 2024 • We reviewed phosphorus compliance for all 127 water bodies within SAC Rivers in Wales, as detailed on our website Update to phosphorus targets for water bodies in Special Area of Conservation (SAC) rivers in Wales. It would be beneficial to include a summary of the key issues. • Land use is a critical source of pollutants (silt, phosphate, etc) which affect water quality, biodiversity, designated sites, amenity value, etc. There is an opportunity here to better link these policy areas to address wider environmental impacts, which are linked to, but perhaps not immediately associated with flooding. A new section addressing these issues could be titled: “Managing Flood Risk from Agricultural Runoff”. It could include: o A summary of the issue. o Strategic objectives. o Proposed measures and partnerships o Monitoring and evaluation framework. Agricultural runoff contributes to flood risk through: o Compacted soils reducing infiltration. o Bare fields increasing surface runoff. o Field drains and ditches accelerating water flow. o Nutrient and sediment loading affecting water quality and drainage capacity.	Specific construction measures not known at this stage and therefore cannot cover abstraction licenses and regulations etc.
cont o Loss of hedgerows and buffer strips reducing natural attenuation. These impacts are especially relevant during intense rainfall events, which are becoming more frequent due to climate change. Elements that could strengthen the strategy: 1. Catchment-Sensitive Farming Measures o Promote soil health and cover cropping to reduce runoff. o Encourage buffer strips, hedgerow planting, and wetland creation. o Support slowing the flow techniques like leaky dams and contour ploughing. 2. Engagement with Landowners o Work/ liaise with NFU Cymru, landowner forums, Natural Resources Wales to: o Identify high-risk catchments. o Offer advice and incentives for runoff-reducing practices. o Integrate flood risk into agri-environment schemes. 3. Monitoring and Mapping o Use GIS and LiDAR to identify runoff pathways and erosion-prone areas. o Include agricultural runoff in local flood risk mapping and investigations. 4.4.4 Summary of key issues • Suggest inclusion of the issue that the River Usk below Abergavenny is failing to meet SAC phosphorus targets. As well as relevant opportunities and issues from the comments above.	It was not deemed necessary to include, as this should be addressed within the LFRMS not SEA. A summary of the issue has been covered within the SEA. River Usk phosphorus targets have been acknowledged
5.5 Geology and soils Disused coal tips within Monmouthshire should be referenced - Coal tip safety GOV.WALES • Two notable features which are referenced in the draft LFRMS should be referenced - the Nedern Brook Wetlands and the Great Spring at Sudbrook. • Contaminated land at risk of flooding could be included	Disused coal tips have been covered in 5.5.1. Nedder Brook has been covered in the doc on various occasions.
5.6 Historic environment Industrial legacy and iron works should be noted (links to Geology and soils) • Please refer to Historic Environment and Climate Change Sector Adaptation Plan (gov.wales)	Included in 5.6.1 and 2.

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	5.7 Population and Human Health Please review and refer to: • Public Health Wales - Health Impact Assessment Climate Change • British Red Cross research Every time it rains and Vulnerability and resilience: public awareness and perceptions of flood risk in the UK • The English National Study of Flooding and Health - Summary of the evidence generated to date Suggestion for further considerations: • How the demographics and housing stock of MCC may impact flood vulnerability and other climate change risks. Including the reduced capacity to cope/recover. For example the vulnerability of people including additional risk factors, overcrowding, homelessness, those living in income poverty and the ability to have relevant insurance. The vulnerability of particular housing types like caravan parks, basements or bungalows. • The opportunity to deliver nature-based solutions and green infrastructure should be considered, for the reduction of flood risk, as well as the multiple benefits they can offer including access to green and blue spaces and the potential to improve physical and mental health. • The amount of urban/rural areas at flood risk within MCC. For instance, a sparsely populated rural and semi-rural area will face different challenges with flood risk, compared to a densely populated urban area.	Covered within 5.7.4
	5.8 Material Assets Please review and refer to: • Building Resilience to Flooding in Wales by 2050 – The National Infrastructure Commission for Wales • Transport for Wales' Climate adaptation and resilience plan (tfw.wales) • Network Rail's Weather Resilience and Climate Change Adaptation Plan 2024 - 2029 Suggestion for further considerations: • Consideration of MCC's land, assets and consideration for flood risk and coastal erosion in the present day and considering climate change (including flood risk assets). • What key infrastructure (public transport hubs/networks, hospitals, schools, utilities, active travel routes, Wales Coast Path etc) are at risk of flooding • Utility providers and associated infrastructure, as mentioned in the draft LFRMS. • There is an opportunity for nature-based solutions to reduce soil erosion, as well as flood risk, and provide wider benefits such as reducing water pollution and increasing resilience during droughts. For instance, land management practices, reconnecting watercourses to the floodplains to slow the flow. Sustainable and regenerative agricultural land management within catchment areas has an important part to play in reducing soil surface run-off and erosion associated with degraded soil structure from intensive practices: Welsh Information for Nature-based Solutions (WINS) Wales Environmental Information Portal, Reference to predictive agricultural soil classification maps and consideration should also be given to the Sustainable Farming Scheme GOV.WALES	Covered within 5.8 Spatial data for in depth infrastructure analysis from flood risk is not available.
	5.9 Peatland and saltmarsh baseline in Monmouthshire should be included as use of nature-based solutions which sequester carbon is noted as an opportunity. The Wales Environmental Information Portal contains the new peat map showing the locations of all Peatlands in Wales. The National Peatland Action Programme (NPAP) is a 5-year plan (2020-2025) of peatland restoration in Wales. Welsh peatlands need urgent action to reverse habitat loss and their poor condition. They support a variety of habitats and species, and have an important role in: o capturing and storing carbon o regulating greenhouse gases o maintaining biodiversity o regulating water To determine any opportunities project managers should contact the NPAP team: npap@naturalresourceswales.gov.uk • Interaction of flood risk with other climate change hazards like heatwaves, droughts, landslides, wildfires. • Adaptation to climate change impacts could be expanded. People do need to be educated more about the need to live with and adapt to how the river behaves at certain locations. This links to the Flood Awareness measure within the draft LFRMS. • Quote content from Shoreline Management Plan, associated policy units and action plan Suggest inclusion of link to our coastal risk maps for summary SMP information, accessible from our webpage: Natural Resources Wales / Shoreline Management Plans.	Addresses peat mitigation in 5.9.3. Adaptation section also added in 5.9.
	8.5 Table 8-3 Mon 9 - Depending on what is meant by review culverting policy (e.g. does it include removal / use of clear span bridges as alternative, sunken beds), there is potential opportunity to benefit connectivity.	As there is no further information regarding what the policy review will include, we cannot assume opportunities to benefit connectivity will be realised. Therefore, a neutral effect has been predicted as the action <u>may not result in a tangible improvement on the ground</u>
	Table 8-4 Added to assess the measures, including those updated following NRW reviews	N/A
	9.3 The strategy discusses monitoring but lacks quantitative KPIs for evaluating success of actions. It would be beneficial to have a framework for reporting including a dashboard or table of KPIs linked to strategic objectives, with timeframes and responsible officers. • Table 9-1 – We can see that Natural Resources Wales has been highlighted as a possible management partners for a number of indicators. Please contact southeast.as@cyfoethnaturiolcymru.gov.uk so we can discuss and signpost to the datasets that we hold.	Further detail on frequency added to monitoring table.
	Appendix B Plans, Policies and Programmes Flood Risk Regulations (2009) - These Regulations were revoked as part of the Retained EU Legislation Act on 31st December 2023.	Updated.
General Public (Redacted)	2.1. Integration with the National Strategy The document is in line with the Welsh Government's National Strategy for Flood and Coastal Erosion Risk Management (FCERM). However: • Localisation needs more depth: Although the objectives and measures are mapped against national goals, the document often lacks detail about how Monmouthshire's unique topography, infrastructure or vulnerable populations influence these priorities. • Climate change considerations are recognized but are not supported by local climate modelling or county-specific projections. General references are made to the "increasing frequency and severity" of storms, but there is very little data-based analysis.	References to Monmouthshire's topography, infrastructure and vulnerable populations (areas most at risk) are referenced within the main Strategy and in detail within the Action Plans - no amendments required. More Monmouthshire specific climate change projections have been added through links to Met Office Local Authority Climate Service and City Packs.

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12/08/2025	2.2. Risk Assessment Methodology The use of Strategic Flood Risk Areas (SFRAs) to analyze the county by catchment area is robust and promotes a holistic understanding of risk. However: • No risk rating or heat mapping is included in the summary. There is no mention of which SFRA faces the greatest risk or has the most vulnerable infrastructure. • The reliance on historical events such as Storm Dennis or Storm Bert should, while useful, be complemented by predictive risk modelling.	Detail on areas most at risk is included in the individual SFRA Action Plans, including counts of properties, infrastructure and environmental receptors Modelling is outside of the scope of this Local Strategy. Flood maps from NRW's modelling, including from Rivers and Sea, are included in the Strategy and Action Plans
	3. Objectives, Measures, and Actions 3.1. Strategic Objectives • Support for the Water Framework Directive is welcome, but it is not clear how flood risk measures will actively contribute to improvements in water quality. 3.2. Flood Measures • There is no mention of how these measures will be prioritised or funded at the local level. • The relationship between catchment-specific measures and county themes is unclear. • Digital innovation and the use of AI, the Internet of Things (e.g., sensors in culverts, real-time telemetry), or citizen science are not discussed at all.	Measures linking back to the Objective to support the WFD and improve water quality are referenced in Chp. 7, and related Actions linking back to related Measures are referenced within the Strategy and Action Plan. Funding is detailed in Chp. 9. Priority, timescales and costs associated with each Measure and Action are detailed in the Strategy and Action plan respectively. Measure 18 Flood Monitoring references CCTV cameras and river level telemetry. A review of these systems to assess possible expansion of such systems is also referenced. The Action Plan also includes a related action (MON10)
	4. Community Engagement and Resilience The strategy emphasizes public awareness and community flood planning, which is a strength. However: • There is very little on how social vulnerability (e.g., age, income, rural isolation) intersects with flood risk.	Noted - this will be reviewed as part of future community liaison work and development of community and individual flood plans
	5. Funding and Delivery The strategy states that Carmarthenshire County Council will adopt the Welsh Government's funding prioritisation model, but: • It is not clear how Carmarthenshire County Council will address funding shortfalls, or whether co-funding from other partners (e.g., Natural Resources Wales, utilities, private developers) will be pursued. • No sign of contingency planning will be given if a funding application fails or a project is overrun.	Unsure comments relate to Carmarthenshire Council are relevant to MCC's Local Strategy. However, Chp. 9 clearly sets out funding mechanisms and possible other forms of funding. Schemes are typically wholly reliant of WG grant funding in Wales.
	6. Monitoring and Evaluation There is a defined review cycle (every 3 years for the action plan, 6 years for the strategy), but: • The strategy does not detail how success or failure will be communicated to the public, or how transparency will be maintained. • There is no clear mention of a role for independent audit or scrutiny bodies.	Progress on the Objectives, Measures and Actions will be recorded and monitored internally and reported to relative Committees as required where associated reports will be made available online. Anyone who wishes to discuss progress can contact MCC at anytime and the LLFA would be happy to discuss.
	Additional Questions Has Carmarthenshire County Council considered scenario-based planning to take account of different climate forecasts? What local flood modelling tools or climate data have informed this strategy? Can Carmarthenshire County Council provide risk maps or impact sites for each SFRA? How have the specific actions been prioritized, and who signed them? How will Monmouthshire County Council communicate proposed flood risks and mitigation to residents in clear language? What mechanisms exist for public challenge or scrutiny of Monmouthshire County Council's flood control decisions?	MCC have site specific Emergency Response Plans relating to emergency scenarios some of the most at risk locations Modelling and climate change data used to assess flood risk is detailed in Chp. 3.2 Risk Maps and specific receptor counts are included in the Action Plans Communication methods with the public are detailed within the Strategy and Action Plan Priority of Measures and Actions is detailed in the Action Plan, which will be signed off by senior officers and Cabinet The Local Strategy has been subject to public consultation, all comments will be considered in the shaping of the final document. The public can contact MCC anytime to discuss/challenge flood control decisions

Local Flood Risk Management Strategy Public Consultation
Record of Written Responses Received and Resulting Actions / Amendments

MCC's Policy Officer, Climate and Sustainability	13/08/2025	1)I'm keen to make a few tweaks to the Climate Emergency references in the full version. Please could you change these bits to the following... From table on p7: MCC's Climate & Nature Emergency Strategy (2024): In 2019 Monmouthshire County Council declared a climate emergency and produced an action plan for the Council to reduce our contribution to climate change. In addition, MCC has declared a Motion for the Rivers and Ocean which includes an Action Plan focusing on environmental protection and enhancement, improving water quality and reducing flood risk. In 2024 the Climate and Nature Emergency Strategy was updated to bring these strands together and includes actions on council emissions, rivers and oceans, nature recovery and communities and climate. From p29: Following the declaration of a climate emergency, a Climate Emergency Strategy and Action Plan was published, outlining actions and the responsible officer(s) across all sectors, as well as explaining how the public can play their part in reducing emissions. This was refreshed in 2021 to better reflect our commitment to tackling the nature emergency, and in 2024 has been completely updated to reflect the priorities of Monmouthshire's Community and Corporate Plan, with the new Climate and Nature Emergency Strategy (add footnote here) including specific actions relating to Rivers & Ocean and flood risk management, as well as council emissions, nature recovery and communities and climate. 2)Eirst hyperlink from Met Office on p31 – super complex and hard to understand, and no reference to flooding. Is there something more accessible? I know it is not quite Mon, but the Cardiff City Pack from the Met Office is very good I think. SPF City Pack_editable_template Or you can see data and graphs from the Met Office specifically for Monmouthshire here Explore the Climate of your Local Authority 3)P29 para 3 and P32 bottom para – can you clarify that the Net Zero by 2030 target relates to MCC's own emissions, rather than county wide emissions	Suggested wording added. Suggested wording added. Link to Met Office's Local Authority Climate Service added Text amended to reference MCC's reduction of its own emissions (not county wide)
Canal & River Trust	03/09/2025	No comment (received via letter)	No amendments required.