

## Appendix B (Extract from Draft FRMP)

### Appendix 6 Public Consultation – Survey Questions; Results and Comments Received

Q1. The draft Flood Risk Management Plan sets out the most significant flood risk in the Caerphilly County Borough. Do you

- 63% Fully agree
- 31% Partially agree
- 6% Disagree

Q2. What do you consider to be the greatest cause of flood risk in the Caerphilly County Borough?

- 6% Ground water
- 50% Surface water run off
- 19% Blocked culvert inlet grids
- 6% Highway drainage
- 6% Ordinary water courses or streams (*not rivers*)
- 0% Drainage channels
- 6% Combined sewers (*Foul and surface water*)
- 7% Other

Q3. What do you consider to be the highest priorities for managing flood risk in the Caerphilly County Borough? (Please select 2 options)

- 47% Maintenance of culvert inlet grids, drainage channels and gullies
- 27% Improvement of existing drainage infrastructure
- 0% Construction / Improvement of flood defence systems
- 7% Sustainable drainage systems (SuDS) for new developments
- 20% Better land management (reducing run off at the source)
- 0% Other

Q4. Do you feel that this draft Flood Risk Management plan effectively targets and aims to achieve the objectives set out by Welsh Governments National Flood and Coastal Erosion Risk Management strategy (FCERM) of:

- 1. *Reducing consequences*
- 2. *Raising awareness and engaging people*
- 3. *Providing an effective and sustained response*
- 4. *Prioritising investment.*

60% Fully agree  
27% Partially agree  
13% Disagree

Q5. The draft Flood Risk Management plan describes four categories of measures

- 1. *Prevention*
- 2. *Protection*
- 3. *Preparedness*
- 4. *Recovery and Review*

Do you feel the measures contained within the draft Flood Risk Management plan satisfactorily address these categories?

56% Fully agree  
25% Partially agree  
19% Disagree

In which area of Caerphilly County Borough do you live?

31% Not applicable  
19% Nelson  
13% Caerphilly West  
6% Bedwas  
6% Caerphilly North  
6% Caerphilly South  
6% Cefn Fforest  
6% Newbridge  
7% Twyn Carno and Others

Which Organisation or Group do you represent?

56% As a resident of Caerphilly County Borough Council area  
0% Representing a third sector organisation  
0% As a business person  
13% As an elected member  
31% Other

Consultee:

Date comments made:

Risca Town Council

24<sup>th</sup> July 2015

Comment Number	Comment Made	Caerphilly County Borough Council Response
1.1	<p>I have a few comments that are required to be immediately corrected in the Report:</p> <p>Fernlea area in your report is stated as in Risca East. In fact, according to CCBC, Fernlea is part of Risca West not East! Both at County and Community representation level.</p>	<p>Agreed: However the “Fernlea” mention on page 248 of the plan refers to a culvert intake structure known locally as the “Fernlea culvert” which is located in the East community area.</p>
1.2	<p>In the Report, you refer to Clyde Road; this is incorrect. As the Town Councillor for Lower Pontymister and resident of Clyde STREET, another correction required.</p>	<p>Agreed: The text has been amended on page 258 of the Flood Risk Management Plan.</p>
1.3	<p>In the appendices, you refer to Town and Community Councils, this is incorrect. CCBC’s own website list 18; the two missing are Risca Town Council and Risca East Community Council. This is the second time you have omitted consultation with specifically with Risca Town (formerly Risca West) Council and therefore an action point.</p>	<p>Agreed: The missing Town Council and community council will be added to Appendices.</p> <p>However, Risca Town Council and Risca East Community Council were sent an email on the 13<sup>th</sup> July informing them of the consultation.</p>

Consultee:

Date comments made:

Nelson Community Council

12<sup>th</sup> August 2015

Comment Number	Comment Made	Caerphilly County Borough Council Response
2.1	<p>Having looked at the consultation on Caerphilly County Borough Councils draft flood risk management plan, and after reviewing the consultation and the questions set out by the consultation, my members feel that they are neither qualified to answer this document or have the time to review the document as a whole and can only make comment on areas of concern within Nelson.</p> <p>Therefore the main areas of concern have been outlined as follows:</p> <p>An area which has been brought the Council's attention on many occasions is Shingrig Road. During periods of heavy rain the combined drainage systems underneath the roads seem totally inadequate and brown water, considered by many to possibly be sewerage, runs down the road.</p>	<p>Noted: In accordance with the Flood Risk Regulations 2009, the Caerphilly County Borough Council Flood Risk Management Plan covers flooding from surface water, groundwater, ordinary watercourses and the interface with main river flooding. Therefore flooding from combined drainage systems has not been considered as part of this plan. Dŵr Cymru Welsh Water is the responsible authority for combined drainage systems that cause flooding within the County Borough Council area. However in our role as a Lead Local Flood Authority we will continue to meet with Dŵr Cymru Welsh Water to discuss and collaborate on all relevant issues. <b>(Please see item 7.2 and 7.6 of this schedule.)</b></p>
2.2	<p>The area by the Rowan Tree public house floods almost every year causing traffic chaos.</p>	<p>Agreed: Community Area Measures are included in pages 308 – 382 in the Flood Risk Management Plan to deal with these issues.</p>
2.3	<p>The area between the Co-op and the Railway Inn, on Mabon Road, floods almost every year causing traffic chaos.</p>	<p>Agreed: Community Area Measures are included in pages 308 – 382 in the Flood Risk Management Plan to deal with these issues.</p>
2.4	<p>The area at the bottom of the second rugby pitch at Maes yr Onen gets waterlogged and some gardens flood, this has occurred since the building of the housing site on the Bwl Road.</p>	<p>Noted: Community Area Measures are included in pages 308 – 382 in the Flood Risk Management Plan to deal with these issues.</p>
2.5	<p>The backs of the houses along Ashgrove get waterlogged and some gardens flood, this has occurred since the building of the housing site known as High Close.</p>	<p>Noted: Community Area Measures are included in pages 308 – 382 in the Flood Risk Management Plan to deal with these issues.</p>

Comment Number	Comment Made	Caerphilly County Borough Council Response
2.6	<p>It must be understood by both the Council and the Water Company that Nelson is an 'old community'. The Nelson Main Sewer was built circa 1895 and is a combined rain water run-off and sewerage main. Consequently, the Housing Development, which has taken place in Nelson over the past 45 years or so, has outgrown its capacity.</p>	<p>Noted:</p> <p>In accordance with the Flood Risk Regulations 2009, the Caerphilly County Borough Council Flood Risk Management Plan covers flooding from surface water, groundwater, ordinary watercourses and the interface with main river flooding. Therefore flooding from main sewers has not been considered as part of this plan. Dŵr Cymru Welsh Water is the responsible authority for main sewers that cause flooding within the County Borough Council area. However in our role as a Lead Local Flood Authority we will continue to meet with Dŵr Cymru Welsh Water to discuss and collaborate on all relevant issues. <b>(Please see item 7.2 and 7.6 of this schedule.)</b></p>
2.7	<p>This Main Sewer apparently meets the Merthyr Trunk Sewer at Fiddler's Elbow. How big is this pipe and can it cope with any further development, without being upgraded by the Water Company?</p>	<p>Noted:</p> <p>In accordance with the Flood Risk Regulations 2009, the Caerphilly County Borough Council Flood Risk Management Plan covers flooding from surface water, groundwater, ordinary watercourses and the interface with main river flooding. Therefore flooding from trunk sewers has not been considered as part of this plan. Dŵr Cymru Welsh Water is the responsible authority for trunk sewers that cause flooding within the County Borough Council area. However in our role as a Lead Local Flood Authority we will continue to meet with Dŵr Cymru Welsh Water to discuss and collaborate on all relevant issues. <b>(Please see item 7.2 and 7.6 of this schedule.)</b></p>

Consultee:

Natural Resources Wales (Head Office)

Date comments made:

21<sup>st</sup> August 2015

Comment Number	Comment Made	Caerphilly County Borough Council Response
3.1	<p>A map showing the boundaries of the Flood Risk Area. The FRMP contains the following maps showing the boundaries of the Flood Risk Area: Figure 2, study area map on page 5. Figure 3, map of Caerphilly flood risk area on page 15. Figure 4, the Borough map with wards on page 20. Further maps which also show the flood risk area and what is at risk on pages 60-62.</p> <p><b>Meets the requirements.</b></p>	Agreed: No response required.
3.2	<p>The conclusion drawn from the flood hazard and risk maps published under Regulations 22 of the Flood Risk Regulations 2009.</p> <p>The report contains stats tables on pages 18-19 and summary conclusions on page 45. Further stats are included in Table 5 on page 46.</p> <p>More detailed conclusions are included for each community area which summarises the main flood risk and what and where is most at risk of flooding.</p> <p><b>Meets the requirements.</b></p>	Agreed: No response required.
3.3	<p>Objectives for the purpose of managing the flood risk.</p> <p>Objectives are included in section 5.3, pages 39 and 40 and are linked to social, economic and environment on pages 42 and 43.</p> <p><b>Meet the requirements.</b></p>	Agreed: No response required.

Comment Number	Comment Made	Caerphilly County Borough Council Response
3.4	<p>Proposed measures for achieving those objectives, and description of proposed timings and manner of implementing the measures including details of who is responsible for implementation.</p> <p>Proposed measures for achieving objectives start in section 6.1, page 47 until page 57 for Borough wide measures. More specific measures are included for each community at risk of flooding. Measures include all relevant information to meet the EU requirements.</p> <p><b>Meets the requirements.</b></p>	Agreed: No response required.
3.5	<p>A description of the way implementation of measures will be monitored is included within section 9.</p> <p>The FRMP will be reviewed formally after 6 years for Europe. In each December, current position regarding implementation of each measure will be monitoring.</p> <p><b>Meets the requirements.</b></p>	Agreed: No response required.
3.6	<p>Consultation This needs to be completed after completion of the consultation but current content in section 8 looks good.</p>	Agreed: Section 8 has been completed and a report on the consultation and outcomes included.
3.7	<p>Where the person preparing the report thinks it appropriate, information about how the implementation of measures under the flood risk management plan and the river basin management plan for the area will be co-ordinated at a river basin level.</p> <p>A summary is contained in section 4.3 with the Borough measures within section 6.1 linked to the appropriate River Basin Management Plan (RBMP) measures. This meets the requirements but as a suggestion, the link to the RBMP could be furthered strengthened through linking the objectives to the RBMP (for example, the sub-objective under overarching objective 1 and 3 will contribute towards WFD delivery).</p>	Noted: No action required

Comment Number	Comment Made	Caerphilly County Borough Council Response
3.8	<p>How were the SEA and HRA requirements considered and met?</p> <p>Pages 38 and 39 contain information from the current SEA on the approach to selecting measures for delivery.</p> <p>Page 57 contains a statement as follows:</p> <p>All the detailed objectives and measures contained in this Flood Risk Management Plan were included in the Strategy and therefore the Strategic Environmental Assessment and Habitat Regulations Assessments, which was prepared for the Strategy, is still valid. It has not been considered necessary to review the Strategic Environmental Assessment or Habitat Regulations Assessment. No physical work will be constructed on site as part of this Flood Risk Management Plan but investigative work may highlight works necessary. Should that be the case a review of the Strategic environmental Assessment will be carried out on a site by site basis. Therefore this meets the requirements but it is suggested that the existing SEA is referenced (insert link in the report).</p>	<p>Noted: A link to the Strategic Environmental Assessment to be inserted into page 57 of the Flood Risk Management Plan</p>

Consultee:

Natural Resources Wales (Framework Directive Team)

Date comments made:

21<sup>st</sup> August 2015

Comment Number	Comment Made	Caerphilly County Borough Council Response
4.1	<p>Good to see the document is linked to the Severn River Basin Management Plan under the following sections: Page 30 Section 4 Coordination with Severn RBMP. Page 32 links to RBMP (Note ½ page is duplicated). Page 33 has a list of linked measures in this flood plan and the RBMP. Page 34 Makes link with Welsh Government Objectives of this plan with WFD.</p>	Noted: No response required.
4.2	<p>With regards specific actions that could show WFD benefits: Page 8 talks about groundwater and potential mine water investigations and measures. We'd like to be informed of any such cases.</p> <p><i>The flood management plan will allow for investigations of the location of mine water flows and their likely volume, if there is evidence to indicate that such flows could present a flood risk.</i></p> <p><i>It is also common for mine water to be coloured red, which is usually a sign that the water is ferruginous meaning that it contains iron salts, which are detrimental to the quality of the watercourse below the discharge point. It is proposed that, if required, measures will be introduced what will remove the iron salts from the mine water and thus improve the quality of the water downstream of the discharge.</i></p>	Agreed: No response required.
4.3	<p>Limiting surface water runoff: <i>Runoff will be altered if an area is subject to new development such as housing. Although the total runoff is likely to increase, controls will be imposed to restrict the maximum rate runoff from these developments to a level no greater than greenfield runoff or existing discharge rates where appropriate.</i></p>	Agreed: No response required.

Comment Number	Comment Made	Caerphilly County Borough Council Response
4.4	<p>And the measures to reduce potential impact from Highway drainage: <i>Highway drainage may also be a source of pollution from hydrocarbons. This is particularly acute when prolonged dry periods are followed by intense rainfall. This is particularly adverse for the first flush of runoff. The Flood Risk Management will look at the possibility of installing measures such as swales and red beds that will reduce velocities and improve water quality.</i></p>	Agreed: No response required.
4.5	<p>Page 9 talks about sensitive channel vegetation maintenance practices which can benefit water quality. <i>Flooding within channels is usually caused by lack of maintenance. Where channels are in the ownership of Caerphilly County Borough Council operational procedures are in place to ensure that the capacity of the channels is not impaired. Inspection of channels, where there is significant risk of flooding, is carried out on a regular basis and debris is removed. The grass is not usually cut as this is helpful in the reduction of pollution. Trees and shrubs are not usually removed as their root system often helps to stabilise the ditches. However, where flows are impeded trees and shrubs will be cut back as appropriate.</i></p>	Agreed: No response required.
4.6	<p>Page 10 talks about working with DCWW and ourselves with regards issues around combined sewers. Currently this working ok and we obviously like that to continue.</p>	Agreed: No response required.
4.7	<p>Note the Highlighted 'quality – presumably they mean 'quantity'. Caerphilly County Borough Council will work collaboratively with our partners Natural Resources Wales and DCWW to identify all combined sewer overflows and to establish their efficiency and the quality of water being discharged.</p> <p>Where necessary, Caerphilly County Borough Council will work with Natural Resource Wales and DCWW to introduce measures which will reduce the 'quality' of foul sewerage being discharged from the combined sewer system into surface water systems.</p>	Agreed: Text amended on page 10 of the Flood Risk Management Plan.

Comment Number	Comment Made	Caerphilly County Borough Council Response
4.8	<p>Page 40 talks about creating 'natural' channels and has a picture next to it of what they refer to as a matured drainage channel'</p> <p>This appears to be a concrete and stone channel with a bit of grass. This is not what we'd class as a 'natural channel' with minimal modifications.</p>	Agreed: Title of the photo on Page 40 to be changed.
4.9	Page 480 – Talks about SuDs, note difficulties ref SuDs due to adoption issues.	Agreed: No response required.
4.10	Page 488 Clause 6.15.1: Land Management – Talks about work with landowners and minimising potential negative impacts from forestry and agriculture.	Agreed: No response required.
4.11	<p>Page 500 Clause 6.17.1: Investigations – Again talks about minewater investigations, also tip leachate investigations, both of which we'd be interested in seeing the results from.</p> <p>A survey will be carried to identify where leachate is being discharged from refuse tips both current and historic and from cemeteries. The nature of the Leachate will be established and its effect on the quality of surface water; A survey will be carried out of all groundwater discharges from all mine workings to establish the location and quality of water;</p>	Agreed: No response required.

Consultee:

Natural Resources Wales (Planning Team)

Date comments made:

21<sup>st</sup> August 2015

Comment Number	Comment Made	Caerphilly County Borough Council Response
5.1	Minor errors in the document: Page 14 - should state water abstraction licences rather than water extraction.	Agreed: Text amended on page 14 of the Flood Risk Management Plan.
5.2	Page 44 - reservoirs are subject to discharge consents not discharge licences.	Agreed: Text amended on page 44 of the Flood Risk Management Plan.
5.3	<b>Nearby Licences</b> Is the licence data used in the 'counts' in the plan from NRW or Local Authority records? Local Authorities have records of unlicensed private domestic water supplies which NRW do not have access to. Need to ensure data has been used from both sets of data.	Noted: CCBC drainage officers to Liaise further with CCBC Environmental Health Officers on this issue.
5.4	<b>Deregulated Licence</b> Licences were deregulated in 31 <sup>st</sup> March 2005. Deregulated licences include any abstraction of less than 20 cubic metres per day from surface water source (e.g. stream or drain) or from underground strata (via borehole or well) for any particular purpose. It is possible that there are other unlicensed abstractions present, particularly for domestic and / or agricultural use. Or that deregulated licences known before 31 <sup>st</sup> March 2005 are now no longer active. Certain private water supplies do not require a licence; therefore Natural Resources Wales is not necessarily aware of existence. The locations of private domestic sources may be held by the local authority on a register required by the Private Water supplies Regulations 1992.	Noted: CCBC drainage officers to Liaise further with CCBC Environmental Health Officers on this issue.

Comment Number	Comment Made	Caerphilly County Borough Council Response
5.5	<p><b>Licences affected by flooding</b></p> <p>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.</p>	Noted: No response required.
5.6	<p><b>New licences required for flood defence measures</b></p> <p>We would also need to know if there are flood defences activities or any new flood defence measures that might require an abstraction licence – temporary or full ie. Dust suppression for construction of new flood defences. The same would apply to the potential requirement for any impoundment licences. A licence from Natural Resources Wales may be required for these activities.</p>	Noted: No response required.
5.7	<p><b>Licence requirements – abstraction</b></p> <p>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 from Natural Resource Wales 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 not required an abstraction licence.</p> <p>Types of licences and how to apply – <a href="http://naturalresouces.wales/apply-and-buy/water-abstraction-licences-water-discharges/water-abstraction-and-impoundment-licensing/apply-for-a-water-abstraction-or-impoundment-licence/?land=en">http://naturalresouces.wales/apply-and-buy/water-abstraction-licences-water-discharges/water-abstraction-and-impoundment-licensing/apply-for-a-water-abstraction-or-impoundment-licence/?land=en</a></p>	Noted: No response required.
5.8	<p><b>Licence requirement – impoundments</b></p> <p>If a watercourse, ditch or stream is to be impounded then an impounding licence is likely to be required from Natural Resources Wales.</p>	Noted: No response required.

Comment Number	Comment Made	Caerphilly County Borough Council Response
5.9	<p><b>Small impounding structures policy</b></p> <p>There may be opportunity for any works to come under our low-risk impounding policy, guidance note is available on our website here: <a href="http://naturalresources.wales/apply-and-buy/water-abstraction-licences-and-impoundment-licences/water-abstraction-and-impoundment-licensing/apply-for-a-water-abstraction-or-impoundment-licence/?lang=en">http://naturalresources.wales/apply-and-buy/water-abstraction-licences-and-impoundment-licences/water-abstraction-and-impoundment-licensing/apply-for-a-water-abstraction-or-impoundment-licence/?lang=en</a></p> <p>However in addition to the statutory exceptions, there may be occasions when an impounding licence is not necessary. Taking a risk based approach, it was established through interpretation and practice that it is not necessary to require a licence for works, provided that they:</p> <ul style="list-style-type: none"> <li>• Do not raise the upstream water level outside the normal (that is under non-flood conditions) wetted perimeter of the stream ; and</li> <li>• Do not temporarily or permanently modify the flow regime in a way that is potentially detrimental to other interests or the environment.</li> </ul>	Noted: No response required.

Consultee:

Natural Resources Wales (Flood Risk Analysis)

Date comments made:

21<sup>st</sup> August 2015

Comment Number	Comment Made	Caerphilly County Borough Council Response
6.1	<p><b>Question 1. Do you agree or disagree that the Draft Flood Risk Management Plan sets out the most significant flood risk in Caerphilly County Borough? Please select one option.</b></p> <p>Fully Agree</p> <p><u>Please give reasons for your answer</u></p> <p>The FRMP overall is well structured and presented throughout, which for the reader does help clearly establish those sites which are at significant risk. The summaries which provide the total cost of measures for each community area especially the summary on page 58 "Total Cost of Measures for the Caerphilly County Borough Council Flood Risk Area is a very useful indicator on those specific areas which have the greatest risk and corresponding costs to remedy flood risk within these locations.</p>	Agreed: No response required.
6.2	<p><b>Question 2. What do you consider to be the greatest cause of flood risk in Caerphilly County Borough? Please select one option.</b></p> <p>Blocked culvert inlet grids</p>	Noted: No response required.
6.3	<p><b>Question 3. What do you consider to be the highest priority for managing flood risk in Caerphilly County Borough? Please select one option.</b></p> <p>Maintenance of culvert inlet grids, drainage channels and gullies.</p>	Noted: No response required.
6.4	<p><b>Question 4. Do you agree or disagree that this draft Flood Risk Management plan effectively targets and aims to achieve the objectives set out by Welsh Government National Flood and Coastal Erosion Risk Management Strategy (FCERM).</b></p> <p>Fully agree</p> <p><u>Please give reasons for your answer</u></p> <p>These targets have been developed by Welsh Government in consultation with the Risk Management Authorities (RMAs) to deliver a structured approach to Flood Risk Management for the future.</p>	Agreed: No response required.

Comment Number	Comment Made	Caerphilly County Borough Council Response
6.5	<p><b>Question 5. Do you agree or disagree that the measures contained within the Draft Risk Management Plan satisfactorily address these categories? <i>Please select one option.</i></b></p> <p>Fully agree</p> <p><u>Please give reasons for your answer</u></p> <p>The measures have previously been further developed from the Local Flood Risk Management Strategy which was a requirement of the National Strategy above. These measures provide a good steer to LLFAs on which ones are appropriate to use in delivering the desired outcomes of the FRMP to manage flood risk in their specific catchment areas.</p>	Agreed: No response required.
6.6	<p><b>Question 6. How do you think, as an individual/organisation can support the work set out in the Draft Flood Risk Management Plan to reduce flood risk?</b></p> <p>By working in partnership with other RMAs in delivering schemes which in some instances will deliver benefits from various sources of flooding. This is a better use of resources and funding can result in scheme being more cost beneficial and deliverable.</p>	Agreed: No response required.

Consultee:

Dŵr Cymru Welsh Water

Date comments made:

24<sup>th</sup> August 2015

Comment Number	Comment Made	Caerphilly County Borough Council Response
7.1	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.	Agreed: No response required.
7.2	We are pleased that the FRMPs acknowledge the need to protect key infrastructure. As a statutory water and sewerage undertaker, we are very mindful that our customers – domestic and commercial – are reliant on the essential water and sewerage services that our sector provides.	Noted: No response required.
7.3	Article 7 of the Floods Directive requires that flood risk management plans take the Water Framework Directive's (WFD) environmental objectives into account and requires co-ordination in the application of the two directives. We are pleased to see that the objectives in your FRMP have clear links to those of WFD.	Agreed: No response required.
7.4	From Dŵr Cymru's perspective, it would be an inefficient use of our customer's 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.	Noted: No response required.
7.5	We are pleased to note the inclusion of information on how you maintain your assets, particularly culverts and the highway network. It would be useful if we could receive information on your assets as part of the data sharing responsibilities in order for us to better understand the interaction between all drainage infrastructures in the county.	Agree: However, in accordance with the Flood Risk Regulations 2009, any data sharing protocols would need to be reciprocal
7.6	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.	Agree: No response required.

Consultee:

Date comments made:

Online Questionnaire

25<sup>th</sup> August 2015

Comment Number	Comment Made	Caerphilly County Borough Council Response
<b>Q) Do you agree or disagree that the Draft Flood Risk Management Plan sets out the most significant flood risk in Caerphilly County Borough?</b>		
8.1	With respect to Nelson you have not taken into account the Review of the CCBC's Local Dev Plan, which is to increase housing, which will affect the situation for the residents of Nelson, unless there is major investment into the Nelson Main sewer capacity.	Measures have been included in the Flood Risk Management Plan to deal with Sustainable and Strategic Development Planning issues.  In accordance with the Flood Risk Regulations 2009, the Caerphilly County Borough Council Flood Risk Management Plan covers flooding from surface water, groundwater, ordinary watercourses and the interface with main river flooding. Therefore flooding from main sewers has not been considered as part of this plan. Dŵr Cymru Welsh Water is the responsible authority for main sewers that cause flooding within the County Borough Council area. However in our role as a Lead Local Flood Authority we will continue to meet with Dŵr Cymru Welsh Water to discuss and collaborate on all relevant issues. <b>(Please see item 7.2 and 7.6 of this schedule.)</b>
8.2	The risk plan over complicates water runoff plans, many local people know which drains and culverts are blocked and waterways diverted.	Noted: Caerphilly County Borough Council acknowledges the importance of local community engagement with regards to flood risk. Therefore, measures have been included in the Flood Risk Management Plan to encourage engagement with communities so we can better understand local flooding issues causes and impacts.

Comment Number	Comment Made	Caerphilly County Borough Council Response
8.3	The draft management plan fails to acknowledge the lack of modern sewerage infrastructure upgrade by the appropriate water authority is having a detrimental effect upon residential amenity of older homes whose rainwater run-off, goes into a combined sewer and, there appears to be no plan within the Draft plan to address this problem.	Noted: In accordance with the Flood Risk Regulations 2009, the Caerphilly County Borough Council Flood Risk Management Plan covers flooding from surface water, groundwater, ordinary watercourses and the interface with main river flooding. Therefore issues concerning sewer infrastructure have not been considered as part of this plan. Dŵr Cymru Welsh Water is the responsible authority for sewers within the County Borough Council area. However in our role as a Lead Local Flood Authority we will continue to meet with Dŵr Cymru Welsh Water to discuss and collaborate on all relevant issues. <b>(Please see item 7.2 and 7.6 of this schedule.)</b>
8.4	Far too detailed, is it all manageable? I don't think so! Apply Pareto Principles and tackle the 20% that causes 80% of the problem.	Noted: The Flood Risk Regulations 2009 state that 'A lead local flood authority must prepare a flood risk management plan in relation to <b>each relevant flood risk area.</b> ' Therefore to in order to satisfy the regulations, the Caerphilly County Borough Council Flood Risk Management Plan details objectives and measures for all areas where significant flood risk has been identified. Some measures have already been implemented through funding made available by Welsh Government, but in order for this Flood Risk Management Plan to be successful it is essential that significant further funding be made available to Caerphilly County Borough Council from Welsh Government. Failure to receive funding could result in measures identified in this report not being implemented either in part or in full.
<b>Q) What do you consider to be the greatest cause of flood risk in Caerphilly County Borough?</b>		
8.5	It depends on the area. Different problems in different areas.	Agreed: No response required.

Comment Number	Comment Made	Caerphilly County Borough Council Response
<b>Q) What do you consider to be the highest priority for managing flood risk in Caerphilly County Borough?</b>		
8.6	<p>Nelson Main Sewer was built over a hundred years ago. Since then number of people living in the area increased significantly but, there has been little improvement in the capacity of the Nelson main sewer.</p> <p>As before. Depends on the area</p>	<p>Noted: In accordance with the Flood Risk Regulations 2009, the Caerphilly County Borough Council Flood Risk Management Plan covers flooding from surface water, groundwater, ordinary watercourses and the interface with main river flooding. Therefore flooding from main sewers has not been considered as part of this plan. Dŵr Cymru Welsh Water is the responsible authority for main sewers that cause flooding within the County Borough Council area. However in our role as a Lead Local Flood Authority we will continue to meet with Dŵr Cymru Welsh Water to discuss and collaborate on all relevant issues. <b>(Please see item 7.2 and 7.6 of this schedule.)</b></p> <p>Agreed: No response required</p>
<b>Q) Do you agree or disagree that this draft Flood Risk Management plan effectively targets and aims to achieve the objectives set out by Welsh Government National Flood and Coastal Erosion Risk Management Strategy (FCERM).</b>		
8.7	There is lack of financial investment to address the issues.	<p>Agreed: Some measures have already been implemented through funding made available by Welsh Government, but in order for this Flood Risk Management Plan to be successful it is essential that significant further funding be made available to Caerphilly County Borough Council from Welsh Government. Failure to receive funding could result in measures identified in this report not being implemented either in part or in full.</p>
8.8	Lack of consultation.	<p>Strongly Disagree: Caerphilly County Borough Council acknowledges the importance of public engagement. Therefore, it has undertaken three extensive public consultations throughout the process of creating the Local Flood Risk Management Strategy and the Flood Risk Management Plan seeking the public's views regarding flooding issues.</p>

Comment Number	Comment Made	Caerphilly County Borough Council Response
8.9	With the number of new houses the Welsh Government wants to build it needs to be more proactive in making the water authorities provide the infrastructure required. It cannot all be left to developers.	Noted: In our role as a Lead Local Flood Authority we will continue to meet with Dŵr Cymru Welsh Water to discuss and collaborate on all relevant issues. <b>(Please see item 7.2 and 7.6 of this schedule.)</b>
8.10	It's a document to satisfy a request. It is NOT implementable. Far too detailed. The simplest things have not even been done. A 500 page document does nothing unless action follows. Will it? No! You will say there is no money to implement it yet you found money to write it!	Disagree: Some measures have already been implemented from the Local Flood Risk Management Strategy and Flood Risk Management Plan.  Ring fenced funding has been received from Welsh Government for the financial years April 2010 to March 2015 to produce statutory documents. This funding has been used to prepare the Preliminary Flood Risk Assessment, Flood Hazard and Flood Risk Maps, the Local Flood Risk Management Strategy and the Flood Risk Management Plan.  However, in order for the Flood Risk Management Plan to be successful it is essential that significant further funding be made available to Caerphilly County Borough Council on top of the normal funding arrangements from Welsh Government. Failure to receive this additional funding could result in measures identified in this report not being implemented either in part or in full.

Comment Number	Comment Made	Caerphilly County Borough Council Response
<b>Q) Do you agree or disagree that the measures contained within the Draft Risk Management Plan satisfactorily address these categories?</b>		
8.11	Not sufficient finance provided to achieve best outcomes for the people affected	<p>Some measures have already being implemented from the Local Flood Risk Management Strategy and Flood Risk Management Plan.</p> <p>However, in order for the Flood Risk Management Plan to be successful it is essential that significant further funding be made available to Caerphilly County Borough Council on top of the normal funding arrangements from Welsh Government. Failure to receive this additional funding could result in measures identified in this report not being implemented either in part or in full.</p> <p>Noted:</p>
8.12	There are no specific detailed plans within the Draft Plan to assist water companies to increase the capacity of their combined sewers. They will need financial help to do this.	<p>Caerphilly County Borough Council Flood Risk Management Plan covers flooding from surface water, groundwater, ordinary watercourses and the interface with main river flooding. Therefore flooding from combined sewers has not been considered as part of this plan. Dŵr Cymru Welsh Water is the responsible authority for combined sewers that cause flooding within the County Borough Council area. However in our role as a Lead Local Flood Authority we will continue to meet with Dŵr Cymru Welsh Water to discuss and collaborate on all relevant issues. <b>(Please see item 7.2 and 7.6 of this schedule.)</b></p> <p>Noted:</p>

Comment Number	Comment Made	Caerphilly County Borough Council Response
8.13	As before – too complicated – NOT IMPLEMENTABLE.	<p>Some measures have already being implemented from the Local Flood Risk Management Strategy and Flood Risk Management Plan.</p> <p>Ring fenced funding has been received from Welsh Government for the financial years April 2010 to March 2015 to produce statutory documents. This funding has been used to prepare the Preliminary Flood Risk Assessment, Flood Hazard and Flood Risk Maps, the Local Flood Risk Management Strategy and the Flood Risk Management Plan.</p> <p>Disagree: However, in order for the Flood Risk Management Plan to be successful it is essential that significant further funding be made available to Caerphilly County Borough Council on top of the normal funding arrangements from Welsh Government. Failure to receive this additional funding could result in measures identified in this report not being implemented either in part or in full.</p>
<b>Q) How do you think you, as an individual/organisation can support the work set out in the Draft Flood Risk Management plan to reduce flood risk?</b>		
8.14	Getting involved in any consultation.	Agreed: No response required.
8.15	Reporting of issues when known.	Agreed: No response required.

Comment Number	Comment Made	Caerphilly County Borough Council Response
8.16	WG needs to more proactive in putting information about flooding and sewerage capacity of the drainage and sewer systems into the public domain. WG should ask each of the 735 Town and Community Council across Wales to respond to this consultation and it should be more widely known about by the general public, particularly young people should be actively involved.	<p>As part of the Flood Risk Management Plan consultation process, all 18 Town and Community Councils within Caerphilly County Borough Council area have been consulted.</p> <p>Engagement with members of the public was also made via the Council website; social media; various local press releases and the local libraries.</p> <p>Noted: Caerphilly County Borough Council acknowledges the importance of local community engagement with regards to flood risk. Therefore, measures have been included in the Flood Risk Management Plan to encourage engagement with communities so we can better understand local flooding issues causes and impacts.</p>
8.17	Informing the local council of blockages in watercourses, drains, etc, in found in our normal travels, also a Floodline phone number to report a blockage could be advantage.	<p>Agreed: Caerphilly County Borough Council has in place a Highways Customer Care telephone line (01495 235323) for reporting blockages or highway issues.</p>
8.18	Providing feedback to relevant department during flood incidents and undertake monitoring of local environment. Active participation in planning application processes.	<p>Agreed: Caerphilly County Borough Council has the systems in place for reporting flooding incidents; monitoring the environment and providing comments on planning applications.</p>

Comment Number	Comment Made	Caerphilly County Borough Council Response
8.19	By making known to the county Borough the inadequacy of combined main sewers. To make the Authority aware that in heavy rain these sewers overflow onto roads and into people's homes and gardens. The authority must recognise that, the water table too is often high at the bottom of the valleys throughout the Borough. To expect developers to rely on soakaways in new properties and to foot the bill for the necessary sewerage infrastructure needed will not be enough. More and more the Authority is allowing new housing developments.	<p>Measures have been included in the Flood Risk Management Plan to deal with Sustainable and Strategic Development Planning issues.</p> <p>In accordance with the Flood Risk Regulations 2009, the Caerphilly County Borough Council Flood Risk Management Plan covers flooding from surface water, groundwater, ordinary watercourses and the interface with main river flooding. Therefore flooding from combined sewers has not been considered as part of this plan. Dŵr Cymru Welsh Water is the responsible authority for combined sewers that cause flooding within the County Borough Council area. However in our role as a Lead Local Flood Authority we will continue to meet with Dŵr Cymru Welsh Water to discuss and collaborate on all relevant issues. <b>(Please see item 7.2 and 7.6 of this schedule.)</b></p>
8.20	By being proactive as possible in developing understanding and sharing awareness. By warning of potential flooding incidents and raising the alarm to actual flood events. By actively participating in Highway Team's response to flooding events.	<p>Caerphilly County Borough Council has the systems in place for reporting flooding incidents; monitoring the environment and providing comments on planning applications.</p> <p>Caerphilly County Borough Council acknowledges the importance of local community engagement with regards to flood risk. Therefore, measures have been included in the Flood Risk Management Plan to encourage engagement with communities so we can better understand local flooding issues causes and impacts.</p>
8.21	I regularly report problems. NOTHING gets done!	<p>Caerphilly County Borough Council has in place an excellent customer care system for receiving; logging and monitoring progress of reports of flooding incidents.</p>
8.22	Continue to oppose opens spaces being covered in tarmac, concrete and housing.	<p>Measures have been included in the Flood Risk Management Plan to deal with Sustainable and Strategic Development Planning issues.</p>

**Consultee:**

**Caerphilly County Borough Council (Emergency Planning)**

**Date comments made:**

**3<sup>rd</sup> August 2015**

<b>Comment Number</b>	<b>Comment Made</b>	<b>Caerphilly County Borough Council Response</b>
9.1	The Caerphilly County Borough Council Flood Risk Management Plan is a wide ranging and a well set out document, which clearly satisfies the Councils High Level Objective in relation to flood risk within the County Borough Council area. The Plan comprehensively outlines the Council's objectives and measures for the management of flood risk in the identified areas.	Noted No response required
9.2	Incorrect title on Figure 09 – Should read 'Risk to Natural and Historic Environment'	Agreed: Map title to altered on page 62