

**MTCBC - FLOOD RISK MANAGEMENT PLAN  
Comments and Responses**

No.	Comment	MTCBC Response
	<b>6 Jan 15 RCTCBC</b>	
1	One thing I have noticed and wanted to highlight is that your maps do not have the copyright information, each plan should have Merthyr Council, Welsh Government, Natural Resources Wales and Environment Agency OS Copyright information (just like the District Plans) which looks like this; Reproduced from the Ordnance Survey Mapping with the permission of Her Majesty's Stationary Office © Crown Copyright.	Agreed - The copyright statement was added to all maps on 12th January 2015 and the plan was re-published on 14th January 2015.
	<b>15 Jan 15 WGLA</b>	
2	A clause should be added stating that the detailed objectives and measures used in the FRMP were all included in the FRMS report.	Agreed - Additional statements have been added as follows: Clause 6.2.2 relating to the high level objective Clause 6.3 relating to the detailed objectives Clause 7.1.3 relating to the measures.
	<b>17 Feb 15 WGLA</b>	
3	The only comment I have is regarding setting up flood forums. From recent discussions with NRW and other parties who have tried this approach, it transpires that this is a complex process and requires a large amount of resources especially to keep a group focussed after a year or 2 when the initial momentum diminishes and no flood happen. Would you consider revising this measure to something along the lines of : Looking at innovative ways to raise awareness and community resilience in the most at risk areas'.	Agreed - but have also included the phrase "Flood forums will be set up where appropriate and there is local demand".

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4	<b>19 Feb 15 NRW</b> <b>Comments from NRW Head office</b>	
4.1	A map showing the boundaries of the Flood Risk Area. Meets the requirement. Map showing the boundary of the Flood Risk Area included on page 25 and again on page 28	Agreed - no response required.
4.2	The conclusions drawn from the flood hazard and risk maps published under Regulation 22 of the Flood Risk Regulations 2009 Meets the requirement. Flood risk maps included on pages 66 to 68 and conclusions drawn from those maps included on page 54 for the whole flood risk area. Conclusions from the maps are also included under each Community Area.	Agreed - no response required.
4.3	Objectives for the purpose of managing the flood risk The objectives within the plan can be found in section 6, page 44 onwards. They consider the elements required to meet the legislative requirements by including objectives that reduce the adverse consequences of flooding to human health, economic activity and the environment. The objectives that were set for the LFRMS are still relevant and have been used in the FRMP. This approach is supported, however there needs to be reference made that the objectives from the LFRMS have been adopted by the FRMP to ensure compliance with the legislation.	Agreed - Additional statements have been added as follows: Clause 6.2.2 relating to the high level objective Clause 6.3 relating to the detailed objectives.

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4.4.1	<p>Proposed measures for achieving those objectives, and description of the proposed timing and manner of implementing the measures including details of who is responsible for implementation</p> <p>The proposed measures for achieving the objectives can be found in section 7. There are a series of County Borough wide measures, with a mixture of new and existing measures from the LFRMS. There are then a series of Community Areas with measures that are linked back to the County Borough wide measures. MTCBC are asked to consider how they intend to report to Europe on the measures. Will it be both County Borough wide measures and Community Areas that will be reported?</p> <p>The new County Borough wide measures have all the fields relevant to meet the legislative requirements for measures. Where there are Community Area measures that are linked back to the new County Borough wide measures, these also meet the requirements.</p>	<p>Noted - The measures which cover the whole Borough, as listed in clause 7.1.3, will be placed into the spreadsheet first followed by the detailed measures for each community area as listed in Sections 7.2 - 7.12.</p>
4.4.2	<p>As with the LFRMS objectives, where existing measures from the LFRMS have been referenced in the plan, it needs to be clear whether the measures are being adopted by the plan, and if so, complete the necessary fields for EU reporting.</p>	<p>Agreed - see Clause 7.1.3 relating to the measures</p>
4.5	<p>MTCBC are asked to consider the measure type for MBC M04. Measures that involve design of Flood Alleviation Schemes should be classed as 'Protection' measure types (one of the codes from M31 to M35).</p>	<p>Noted - It is our view that as measure MBC M04 does not involve "physical intervention" it sits more naturally into the category Prevention - M24 Other prevention; Other measures to enhance flood risk prevention (may include, flood risk modelling and assessment, flood vulnerability assessment, maintenance programmes or policies etc...)</p>

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4.6	<p>A report of the consultation This will be completed at the end of the consultation process in section 9 from 161 onwards. Current content looks good, MTCBC need to ensure that a report of the consultation is included in the final plan.</p>	<p>Agreed - Section 9 has been completed and a report on the consultation has been included.</p>
4.7	<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 MTCBC have considered the measures within the RBD FRMP and RBMP and have made links where possible to do so. This is first captured in section 5.3.2 on page 41 and then again with each measure, where appropriate. This is a really good way of linking the plans and demonstrates co-ordination at the plan level.</p>	<p>Agreed - no response required.</p>
4.8	<p>How were the SEA and HRA requirements considered and met? There is no reference to SEA. If MTCBC have reviewed the LFRMS SEA in light of the FRMP, this needs to be mentioned. Alternatively, if MTCBC have made the decision not to review the SEA on the basis that there has been no change the LFRMS SEA needs to be referenced in the FRMP.</p>	<p>Agreed - Clauses 7.1.4 have been added</p>
4.9	<p>Additional observation – map on page 40 – Figure 6: Severn River Basin Catchment Plan – should just be Severn River Basin District Flood Risk Management Plan</p>	<p>Agreed - title on map has been changed.</p>
5	<p align="center"><b>19 Feb 15 NRW Comments from NRW Area office - Flood Risk Management</b></p>	
5.1	<p>Web link in Section 2.3.1.2 does not work.</p>	<p>Agreed - this link was provided for us but a revised link has been included to replace the previous.</p>
5.2.1	<p>Section 3.1.2, Table 1. Table refers to PFRA Flood Risk Area boundary. Might be worth referencing Figure 3 in Section 3.4.2.5 which compares the Flood Risk Area with the LA boundary.</p>	<p>Agreed - Figure 3 has been referenced within the text.</p>

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No.	Comment	MTCBC Response
5.2.2	Not clear of difference between “ <i>Residential properties in areas at risk of flooding</i> ” and “ <i>Residential properties at risk of flooding</i> ” as have exactly the same number. Table should clarify source of flooding, e.g. surface water, ordinary watercourses.	These expressions were provided by the EA. Clause 3.4.2.2 gives an explanation of the two types of flood risk. Table 1 has been modified for clarity and gives total feature counts not related to flood risk.
5.2.3	The Table indicates that 26,185 properties are at flood risk In MTCBC which is also the total number of properties within MTCBC (ref. Section 3.1.1) implying all are at flood risk. I assume this is incorrect.	Agreed - The table has been modified for clarity.
5.3	3. Section 3.2.1 provides a “summary of types of flood risk present in MTCBC” but then only references the risk for the LA. For completeness should also reference NRW FRMP and the potential risk from main rivers, reservoirs etc.	Disagree - River flooding is being dealt with by NRW as part of the FRMP for the Severn River Basin. Including in this document would cause more confusion and double counting of risk.
5.4	Section 3.2.5. Highway flooding also occurs as capacity of highway drains is exceeded. Could possibly give indicative design standards for the gullies and highway drains (e.g. no flooding in Q30 as set out by Sewers for Adoption).	Disagree - the purpose of this report is not to deal with design standards.
5.5	Section 3.2.8. Text needs to be inserted in document in pace of “????”	Agreed - the word "whether" has been inserted.
5.6	Description in Section 3.3 is confusing. Assumed the methodology is correct.	Noted - The methodology is correct and the section has been modified for clarity.

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5.7	Clarify that when proving info on flood risk is based solely on surface water maps (not ordinary watercourses etc).	The information we have provided has been based solely on the Flood Risk and Flood Hazard Maps provided by the EA and NRW. They are based on surface water but inevitably the surface water is shown mainly in ordinary watercourses.
5.8	Repetitive and not an easy read.	Disagree - your comment is not relevant, there is no repetition but the same format has been used for each Community Area.
5.9	Section 5.3.2 is a repeat of 5.3.1.	Disagree - section 5.3.1 refers to the RBMP and 5.3.2 refers to the RBFMP.
5.10	Is high level strategy set out in Section 6.2.2 to <i>“Endeavour to reduce Flood Risk in all of the areas identified as being subject to significant flood risk”</i> a good aspiration or should this be more targeted. Should other options be considered, i.e. Maintain, Maintain at Current Levels or Do Nothing.	Disagree - This comment has been taken from MTCBC LFRMS which was intended to be a high level document and Reduce Flood Risk was one of the options considered along with the three listed here. Also, the FRMP is the document currently being reviewed and not the Strategy and therefore this decision is not being re-considered.
5.11	Should measures in Section 7.1.3 be more targeted rather than directed at the “Whole Borough”, e.g. construction of hydraulic models.	Disagree - This comment does not make sense. The measures have been targeted at each individual Community Area. See Sections 7.2 - 7.12.
5.12	Figure 7 in Section 7.1.5.1 shows significant number of people at risk of flooding (i.e. in excess of 1000 in places), is this correct?	Yes, the counts are correct.

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5.13	<p>Section 7.2.2 states that the “<i>Flood Risk Map for Abercanaid indicate that the main cause of flood risk for the area relates to ordinary watercourses</i>”. As the Map is based on direct rainfall checks need to be made to ensure that is correct to infer flood risk directly from ordinary watercourses (i.e. river flooding). For example, where catchments are greater than the simulation box for the rainfall (i.e.5km) not all water draining to a watercourse will be captured in the model.</p>	<p>See clause 5.7 above  Also, many of our measures relate to carrying out further investigation regarding the runoff from catchments and the process of water entering the existing culverts.  River flooding is not being considered as part of this report as that is the remit of NRW and EA.</p>
5.14.1	<p>The Tables showing “<i>Counts for Various Risks</i>” between Sections 7.2 – 8.5 can be misleading as it refers to residents “in areas at risk of flooding” in one row but then “residential properties at risk of flooding” in the next.</p>	<p>Noted - These expressions were provided by the EA. Clause 3.4.2.2 gives an explanation of the two types of flood risk. However, all the tables listing these counts have been modified for clarity.</p>
5.14.2	<p>It is then not clear how this information has been used to derive numbers in the Tables for the “Potential Reduction in Flood Risk for Each Measure”. For example, in Gellideg Table 18 puts the total number of residents in areas ‘at risk of flooding’ as 303 (sum of High, Medium &amp; Low) but only 25 residential properties are shown to be at risk. In comparison, the total number of residential properties in Table 19 (i.e. Potential reduction in Flood Risk) is 364, how is this number greater?</p>	<p>Noted - The numbers in these tables were meant to be for local use only for comparison between the potential effectiveness of individual measures.  We had originally used a different methodology so that we would not be reliant on information supplied by JBA, hence the different counts. To avoid confusion we have reverted to using the same methodology for the potential risk reduction.</p>

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5.14.3	Measure MT04 is quoted throughout Sections 7.2 – 8.5 as the proposed action. This in itself will not reduce flooding but will help the LA understand the level of flood risk better. It is also suggested that this work will show where flood risk has been over stated by the Flood Risk Maps.	Agreed - no response required.
6	<b>19 Feb 15 NRW</b> <b>Comments from NRW - Flood Risk Assessment Team</b>	
6.1	Section 4.3.1 The Risk Management Authorities Natural Resources Wales – including the legacy bodies Environment Agency Wales Forestry Commission Wales Countryside Council for Wales	Agreed - changes have been made to Section 4.3.1.
6.2	. Section 4.5 – Amend bottom of the “Prevention” table as follows “Issue <b>Ordinary Watercourse</b> Consents, Comment on Flood Consequence Assessment the accuracy of flood risk mapping, understand local flood risk better” s, Update and improve	Agreed - Section 4.5 has been amended.
	<b>Biodiversity Comments</b>	
6.3	The MTCBC Local Flood Risk Management Strategy presents seventeen detailed objectives which outline how the Authority intends to manage flood risk within this LFRMS cycle. These objectives adhere to the high level objectives set out in the Welsh Government’s National Strategy for Flood and Coastal Erosion Risk Management and the ambitions of MTCBCs Community Strategy	Agreed - no response required.



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No.	Comment	MTCBC Response
6.4	<p>Four of these objectives have direct bearing on the Biodiversity aspects of the Strategy – namely;</p> <p>5. Protect and improve Sites of Special Scientific Interest (SSSIs) and Sites of Importance for Nature Conservation (SINCs).</p> <p>6. Contribute to the delivery of Merthyr Tydfil Biodiversity Action Plan.</p> <p>12. Improve naturalness including the creation/restoration/protection of natural channels and water bodies with minimal modifications.</p> <p>13. Protect and where possible Improve water quality.</p>	Agreed - no response required.
6.5	<p>Objectives 5 &amp; 6 being compliant with the Outcomes 19, 20 and 21 of the Wales Environment Strategy and the Natural Environment and Rural Communities (NERC) Act 2006. Objectives 12 &amp; 13 are compliant with the measures under the Water Framework Directive</p>	Agreed - no response required.
6.6	<p>The LFRMS therefore adopts an approach that should deliver habitats and species protection while maintaining good ecological status of water bodies as required by the Water Framework Directive. The objective to improve naturalness is of particular importance as it recognises the negative influence of flood defence engineering has on the ecology and hydro-geomorphology of water bodies/watercourses. Under the Water Framework Directive there is the driver of minimising detrimental impacts to Good Ecological Potential/Status and actually looking for opportunities to repairing damaged systems. MTCBC is within the South East Valleys Catchment of the Severn River Basin District. Currently two water bodies are classed as moderate for Ecological status, one is poor with the other bad. Therefore all water bodies within Merthyr Local Authority are recorded as failing water bodies under WFD criteria. The River Basin plan identifies that local actions will address the key pressures and highlight the key importance of uncontrolled flooding, issues of sewage and contaminated land contributing to failure. The LFRMS will therefore contribute to the measures to improve water quality and prevent further deterioration.</p>	Agreed - no response required.

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No.	Comment	MTCBC Response
6.7	We are pleased to see that the LFRMS framework recognises and protects biodiversity (habitats and species). In general protection of designated sites, SINC sites and protected species, however I would like to see a wider commitment to biodiversity with greater reference to the importance of habitat connectivity in line with ecosystem resilience and the concept of favourable conservation status of species and habitats.	Noted - however, this comment relates to the MTCBC FRMS which is not currently being reviewed and therefore no amendment can be made.
6.8	Reference could be made to key species which are particularly relevant to the area and LFRM including European Protected Species such as native crayfish, otters, bats, great crested newts, Atlantic salmon, river lamprey, and eels. These are protected species within Merthyr and are particularly sensitive to the potential impacts from the LFRMS. There is no specific reference to the inclusion of data on mobile species and the network they depend upon.	Noted - however, this comment relates to the MTCBC FRMS which is not currently being reviewed and therefore no amendment can be made.
6.9	Another key environmental issue is the management to prevent the spread of Invasive Non-Native Species such as Giant Hogweed, Japanese Knotweed, Himalayan Balsam, Floating Pennywort and Signal Crayfish this should also be mentioned and integrated into the Strategy.	Noted but this comment relates to the MTCBC FRMS which is not currently being reviewed and therefore no amendment can be made.
6.10	A key element of the Living Wales agenda is the recognition of an ecosystem approach and the delivery of Ecosystem services. We believe that LFRMS for MTCBC is likely to be a key document in setting out how local flood risk management can be used to deliver ecosystem services. The document sets out high level actions relating to sustainable drainage, surface water management, water course flood risk maintenance while taking into consideration social opportunities for local people integrated with ecological processes and biodiversity protection. We are pleased to see that the strategy considers an integration of Natural Green space with opportunities for flood risk management (SuDS) within the urban development areas.	Agreed - no response required.

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6.11	<p><u>Culverts</u>            At para 6.4.4 the report states “<i>Introduce new flood relief systems such as culverts or drainage ditches</i>”. This statement goes against:</p> <ul style="list-style-type: none"> <li>- the MTCBC and NRW (Legacy EA) Culverting Policy that there is a general presumption against culverting.</li> <li>- Objective 12 of the LFRMS Improve naturalness including the creation/restoration /protection of natural channels and water bodies with minimal modifications.</li> <li>- The Water Framework Directive and the objectives of the Severn River Basin management Plan.</li> </ul> <p>I strongly oppose any plan to use culverts as a solution to managing flooding.</p>	<p>Strongly disagree - this measure will be kept for situations where all other measures are found to be inappropriate. See response to 6.12 below.</p>
<b>6.4.4 MTCBC – STRATEGY ACTION PLAN</b>		
6.12	<ol style="list-style-type: none"> <li>1 Inform and ensure residents are aware of the level of risk they are facing.</li> <li>2 Provide an early warning system to allow residents time to move to a safe area.</li> <li>3 Encourage the residents to produce their own Flood Plan to reduce danger to themselves and damage to their property and its contents.</li> <li>4 Provide systems to prevent floodwater entering properties at risk.</li> <li>5 Endeavour to reduce flood risk by reducing the volume of water being generated by the upstream catchment.</li> <li>6 <b>Introduce new flood relief systems such as culverts or drainage ditches.</b></li> <li>7 Build new flood defences or raise the level of existing flood defences.</li> </ol>	<p>Agreed - This information is the Strategy Action Plan from MTCBC LFRMS. It shows the order in which various measures would be considered for implementation. So the introduction of new flood relief systems such as culverts would only be considered if all other measures proved to be inappropriate. MTCBC still intend to keep this measure in place. It is worth noting that this is included in MTCBC LFRMS which is not currently being reviewed.</p>
<b>Environment Management (EM) Comments</b>		
6.13	<p><b>Sewage treatment works</b>            EM note sewage treatment works are <u>not</u> included in the FRMP as they were not deemed by the Environment Agency as features to be looked at when considering flood risk from surface water and ordinary watercourses.</p>	<p>Agreed - no response required</p>

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No.	Comment	MTCBC Response
6.14	<p><b>Waste operations</b>            EM note waste operations are <u>not</u> included in the FRMP as they were not deemed by the Environment Agency as features to be looked at when considering flood risk from surface water and ordinary watercourses.</p>	Agreed - no response required.
6.15	<p><b>Waste installations</b>            EM note Environmental Permitting Regulations (EPR) installations are <u>are</u> included in the FRMP as they were deemed by the Environment Agency as features to be looked at when considering flood risk from surface water and ordinary watercourses.</p>	Agreed - no response required.
6.16	<p><u>Section 3.1.2</u>            The FRMP identifies two EPR installations in the whole of MTCBC and in the Flood Risk Area (FRA) defined in the Preliminary Flood Risk Assessment (PFRA).</p>	Agreed - no response required.
6.17	<p>Our records indicate the two EPR installations concerned are Treaty Landfill (Biffa Waste Services) and Dowlais Slaughterhouse (Vion Foods).</p>	Agreed - no response required.
6.18	<p><u>Section 7.1.2 and Section 8.1.2</u>            The FRMP identifies of the two EPR installations in MTCBC and in the FRA, only one of the installations is within a 50 m radius of a low flood extent for surface water flooding (1 in 1,000 year event). EM understand this means the other installation identified in MTCBC and in the FRA is located outside of areas at risk of surface water flooding.</p>	Agreed - no response required.
	<p><b>Pollution prevention</b></p>	
6.19	<p><u>Section 3.2.3</u>            EM encourage the introduction of appropriate measures to remove the iron salts from mine water. This will improve the quality of the mine water discharges and subsequently the quality of watercourse(s) downstream of the mine water discharge point.</p>	Agreed - No response required.

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No.	Comment	MTCBC Response
6.20	<p><u>Section 3.2.5</u> EM encourage the installation of appropriate treatment measures, such as swales and reed beds, into highway drainage systems. This will reduce velocities but also help improve the quality of the surface water runoff entering the drainage system and subsequently the quality of watercourse(s) downstream of the highway drainage discharge points.</p>	No response required.
6.21	<p><u>Section 3.2.7</u> EM acknowledge during channel maintenance grass is not usually cut and trees and shrubs are not usually removed as they help stabilise the channels and reduce pollution to the watercourse. However, EM appreciate the needs of pollution prevention and flood risk management must be balanced, therefore where flows are impeded trees and shrubs will be cut back appropriately.</p>	No response required.
6.22	<p><u>Section 3.2.8</u> The FRMP recognises the use of Combined Sewer Overflows (CSOs) to control the flow of combined sewers can cause pollution by the discharge of sewage into the surface water drainage system and main rivers during periods of heavy rainfall. EM welcome the opportunity to work with MTCBC to identify all CSOs, establish their efficiency and the quality of the water being discharged. EM welcome the introduction of measures which will reduce the quantity of sewage being discharged from CSOs to the surface water drainage system and main rivers.</p>	No response required.
	<b>General comments</b>	
6.23	Section 3.2.8, paragraph 2 is incomplete.	See clause 5.5 above.

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6.24	<p><u>Section 7.1.3</u> In the interests of collaborative working, EM would be interested in the survey results, namely: survey to identify where leachate is being discharged from refuse tips (Measure code MBC M03); survey of all groundwater discharges from all mine working (Measure code MBC M03); and, survey of existing drainage system (Measure code MBC M04).</p>	Agreed - the information will be sent to NRW when it is available.
7	<b>Comments received from Consultation - 16 Feb 15</b>	
	<b>Question 1 The draft Flood Risk Management Plan sets out the most significant flood risks in the Merthyr Tydfil County Borough. Do you... Agree, Partially agree, Disagree</b>	
7.1	We are not in a position to comment more fully on local issues.	DC/WW Comment - Agreed.
	<p><b>Question 2 What do you consider to be the greatest cause of risk of flood in the Merthyr Tydfil County Borough? Ground water Surface water run off Highway drainage, Ordinary water courses or streams (not rivers), Drainage channels, Combined sewers (Foul and surface water), Other</b></p>	
7.2	Again, we are not in a position to comment on this issue specifically, however, we are responsible for flooding caused by any public sewer in the borough.	DC/WW Comment - Agreed. We will continue to meet with DC/WW to discuss and collaborate on all relevant issues.

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	<p><b>Question 3 What do you consider to be the highest priorities for managing flood risk in the Merthyr Tydfil County Borough? (Please select 2 options)</b>  <b>Maintenance of culvert grids, drainage channels and gullies, Improvement of existing drainage infrastructure, Construction / Improvement of flood defence systems, Sustainable drainage systems for new developments, Retrofitting of sustainable drainage systems, Better land management (reducing run off at the source), Other</b></p>	
7.3	<p>We are very happy to work with you to share best practice and lessons learnt on our retrofit schemes and we would also like to work more closely on ensuring the appropriate disposal of surface water from new developments.</p>	<p>DC/WW Comment - Agreed. We will continue to meet with DC/WW to discuss and collaborate on all relevant issues.</p>
	<p><b>Question 4 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:</b>  <b>1. Reducing consequences</b>  <b>2. Raising awareness and engaging people</b>  <b>3. Providing an effective and sustained response</b>  <b>4. Prioritising investment.</b>  <b>Agree, Partially Agree, Disagree</b></p>	
7.4	<p>Not sure how it will be funded</p>	<p>Noted - see clause Section 10.</p>

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7.5	We would like to see more on ensuring that people are able to become more resilient to flood events, and would be happy to work with you on raising awareness on increasing resilience and understanding responsibility for flooding.	DC/WW Comment - Noted We will continue to meet with DC/WW to discuss and collaborate on all relevant issues. A measure has been included in the LFRMS to deal with increasing resilience.
	<p><b>Question 5 The draft Flood Risk Management plan describes four categories of measures...</b></p> <p><b>1. Prevention</b></p> <p><b>2. Protection</b></p> <p><b>3. Preparedness</b></p> <p><b>4. Recovery and Review</b></p> <p><b>Do you feel the measures contained within the draft Flood Risk Management plan satisfactorily address these categories?</b></p> <p><b>Agree, Partially Agree, Disagree</b></p>	
7.6	As per our previous answer, we would like to see more on increasing resilience, rather than just protection.	DC/WW Comment - Agreed A measure has been included in the LFRMS to deal with increasing resilience.
	<p><b>Question 6 . How do you think YOU can support the work set out in the draft Flood Risk Management plan to reduce flood risk?</b></p>	
7.7	By ensuring that due diligence is carried out by all stakeholders	Agreed - no response required.
7.8	Continued collaboration with the drainage engineering service.	Agreed
7.9	Maintaining our structure assets within the region to clear to any blocked culverts, ditches and watercourses.	Agreed - measures have been included in the FRMP dealing with these issues.



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7.10	Report any issues that might cause flooding e.g. blocked drains/culverts	Agreed - inspections are carried out on a regular basis, remediation carried out when necessary and before and after photographs taken.
7.11	SWRFS have established a cohort of Tactical Advisors in relation to flooding. Contribution to emergency flooding situations feedback to FRMP following incidents. Suggestion: Utilise social media to remind public that they are able to notify MTCBC of blocked culverts etc.	
7.12	We are keen to work with MTCBC wherever possible in line with our duties as a risk management authority.	DC/WW Comment - Noted We will continue to meet with DC/WW to ensure that we work together wherever appropriate and practicable.
	<b>Question 7 . Are there other flood risk management objectives that should be included?</b> <b>Yes, No</b>	
7.13	No comments received	
8.0	<b>28 Jan 15 MTCBC Planning Department</b>	
8.1	I refer to the current public consultation exercise on Merthyr Tydfil's Draft Local Flood Risk Management Plan. Town Planning's response is provided below. Section 7.1.4 identifies options for additional funding, including funding through the Community Infrastructure Levy and Section 106/Planning Obligations. Whilst the inclusion of these potential sources of funding is supported, it should be noted that there are restrictions on their use.	Noted - no response required.

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8.2	In respect of CIL, funding should not be used to remedy existing deficiencies unless those deficiencies would be made more severe by new development. Where the former criteria is met, CIL can be used to increase the capacity of existing infrastructure or repair failing infrastructure.	Agreed - This clause has been added to the Section renumbered 7.1.5.
8.3	With regard to Section 106/Planning obligations, funding should only be used to mitigate the impact of a specific development. Planning obligations can only be secured where they meet the following tests: necessary to make the development acceptable in planning terms; directly related to the proposed development; and fairly and reasonably related in scale and kind to the development. There are also limits on the pooling of contributions from planning obligations.	Agreed - This clause has been added to the Section renumbered 7.1.5.
8.4	<b>Appendix 2</b> , which highlights the measures contained within the LFRMS, indicates that areas of land identified for development within the LDP may be deemed unsuitable when detailed Plans are produced. A full review of the LDP will formally begin in May 2015 and as such, it will be necessary to consider the implications of the LFRMP for undeveloped development plan allocations as part of this process.	Agreed - This clause has been added to the Section renumbered 7.1.5.
	I trust the above is sufficient for your purposes; however, if you require further information, please do not hesitate to contact me.	Noted - no response required.
9.0	<b>22 Jan 2015 MTCBC - Customer Community Services</b>	
9.1	Clauses 2.1, 2.2 As we own these documents LFRMS & PFRA, for access to all interested people can we provide hard copies alongside FRMP in the locations throughout CB – are these locations listed anywhere?	Agreed - hard copies of the PFRA and the LFRMS will be placed in all libraries, and leisure centres and the Civic Centre together with the FRMP. A list of all locations has been added to the Section 9 - Public Consultation.
9.2	Clause 3.3.6 Would it be better to have fig 3 in page 20 not at page 25? Lot of turning pages back and forth	Agreed - the location of Fig. 3 has been moved.
9.3	Table 4 and Figure 4 no narrative reference in section 3	Agreed - the narrative has been amended to include reference to the figure and table.

**MTCBC - FLOOD RISK MANAGEMENT PLAN**  
**Comments and Responses**

No.	Comment	MTCBC Response
9.4	Table 2 suggest colour lines for "yes"	Agreed - the Community Areas contained within the Flood Risk Area have been given a blue background whilst those areas outside have been left white.
9.5	Clause 4.4 heavily acronym'd - some first mentioned organisations not expanded. Difficult to read.	Agreed - the names of other authorities have been written out in full as it is the only time they have been mentioned in the FRMP.
10.0	<b>27 Feb 15 Dwr Cymru / Welsh Water (DCWW)</b>	
10.1	We welcome the opportunity to comment on the draft FRMP which has been published for consultation and are pleased that we were also given the opportunity to comment on one section during the drafting of the document.	Noted - no response required.
10.2	Overall, we believe that this is a good plan that will provide a good basis for delivering flood risk management measures in the area of Merthyr Tydfil CBC during this first cycle of the Floods Directive.	Noted - no response required.
10.3	Article 7 of the Floods Directive requires that flood risk management plans should take the Water Framework Directive's environmental objectives into account and requires coordination between the application of the two Directives. This should be strengthened in the FRMP, and this is also a comment that we have provided on the EA/NRW FRMP for the Severn, although we believe that table 9.1 in that document provides good examples of linkages.	Disagree - The co-ordination between the WFD and the MTCBC FRMP has been explained in the Plan and NRW have indicated that they are satisfied with what has been done.
10.4	You have referenced two main reservoirs being located partly in MTCBC, namely Llwyn Onn and Pontsticill. As you are aware, DCWW is responsible for the management of these reservoirs and it may be pertinent to reference this.	Noted - Details of the ownership of these water bodies have been included in the MTCBC LFRMS.
10.5	We were really pleased to see a clear statement on the highway drainage maintenance policy in the borough.	Agreed - no response required.

**MTCBC - FLOOD RISK MANAGEMENT PLAN**  
**Comments and Responses**

No.	Comment	MTCBC Response
10.6	You have referenced discussions between MTCBC and DCWW in relation to illegal connections to existing culverts and the culverting of watercourses without consent. I am not aware of any discussions in relation to this specific point, but rather in relation to the updating of DCWW records where culverts have been erroneously mapped as public sewers.	Noted - the clause has been amended to clarify that this matter <b>will be</b> a point of discussion with DC/WW.
10.7	Section 3.2.8 is a little misleading for the general public in relation to explaining what combined sewers and CSOs are, but I would be very happy to provide some alternative wording.	Noted - DC/WW sent amended wording and this has been put into the Plan.
10.8	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 – domestic and commercial – are reliant on the essential water and sewerage services that our sector provides. We would like to see greater prominence given to the need to ensure that both water and wastewater infrastructure such as treatment works are adequately protected and resilient in the instance of a major flooding event.	Noted - however, there are no waste water treatment works within MTCBC but it is the responsibility of the owners of these services to ensure they are protected and made more resilient. Sewage Treatment Works and pumping stations are included in the definition of services and are therefore included in the counts if they are in the National Receptor Database. During the PFRA process the presence of an existing pumping station in Troedyrhiw was taken into account which resulted in an additional "blue square" being added to the MTCBC Flood Risk Area.
10.9	Could I ask that the mobile numbers for Nick Holt and myself are removed from the contact details on page 166. This may be confusing for customers if they pick up the document and we need to ensure that customers are routed through to our customer services teams in the first instance as they are best equipped to ensure that their call is answered and dealt with as quickly as possible.	Agreed. - the mobile numbers have been removed.

**MTCBC - FLOOD RISK MANAGEMENT PLAN**  
**Comments and Responses**

No.	Comment	MTCBC Response
10.10	We wish to continue to work with you to share information and experience, both on existing networks and both retrofit and new build SuDS.	Noted - We will continue to meet with DC/WW to ensure that we work together wherever appropriate and practicable.
11.0	<b>20 Jan 15 NRW</b>	
11.1	To follow up from the SEA item discussed at Thursday's meeting I thought I would just send a quick email to confirm the requirements for the SEA. If the LLFA is not undertaking a new SEA for their FRMP because they have used the same measures as within the LFRMS, the LLFA should state in the FRMP that the SEA from the LFRMS is still valid and include a link within the draft FRMP to the valid SEA.	Agreed - The same measures are being used and therefore the SEA prepared for the Strategy is still valid and no HRA is required. A link to the SEA has been put into the Plan. See clause 7.1.4
11.2	The SEA should be reviewed and updated if necessary to check is still current and appropriate for the FRMP. When it comes to publishing the final FRMP, the SEA should be published alongside the FRMP (or in the very least a link to the SEA should be published alongside the FRMP).	Noted - It was not considered necessary to review the SEA. The SEA has been published on the Webpage and printed copies of the SEA will be included with the FRMP, PFRA and LFRMS at libraries and leisure centres and at the MTCBC Civic Centre. See clause 9.2
11.3	If the LLFA is including some new measures within their FRMP that will not have been included within the LFRMS SEA, the LLFA should seek advice on what is needed in terms of SEA (either internally or through consultant).	Noted - No new measures have been included in the FRMP.
11.2	When the LLFA submits their FRMP to NRW for consultation, the draft plan should be shared with Tom Lewis (if in the Severn RBD) or Richard Wicks (if in Western Wales RBD) and copied to me. The accompanying SEA (either the LFRMS SEA that is still current or new SEA) should then be sent to the Strategic Assessment Team who undertake the Statutory Consultee role for NRW (email: strategic.assessment@cyfoethnaturiolcymru.gov.uk ).	The FRMP was sent to Tom Lewis at NRW, through Rachel Sion, as part of the consultation process. The LFRMS SEA that is still current has been sent to the Strategic Assessment Team.