



**Clerk: Barbara Smith**

**Correspondence Address: Twyn Cottage, Cantref, Brecon, Powys, LD3 8LN**

**Tel: 01874 623947**

**E-mail: [barbara.smith777@btinternet.com](mailto:barbara.smith777@btinternet.com)**

Land Drainage Section  
Powys County Council  
County Hall  
Llandrindod Wells  
Powys  
LD1 5LG

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Dear Sirs

**Powys Local Flood Risk Management Strategy: Response to Public Consultation**

I am writing on behalf of Llanfrynach Community Council to submit its comments on the Powys Local Flood Risk Management Strategy as published in May 2013. We have responded under the headings in the Consultation Questionnaire.

**Q1.** Overall usefulness of the Strategy in helping to (a) provide information about the various forms of flooding in Powys, and (b) set out what actions will be taken as a result of this.

(a) Very useful

(b) Not very useful - as actual actions are limited by priorities and future available resources

**Q2.** Importance of the 11 objectives and the stated actions to us.

Objective 1	Important
Objective 2	Very important
Objective 3	Very important
Objective 4	Important
Objective 5	Not important
Objective 6	Neither important nor unimportant
Objective 7	Neither important nor unimportant
Objective 8	Important
Objective 9	Very important
Objective 10	Very important
Objective 11	Very important

**Q2a.** Our views on specific actions under the Objectives that are very important.

Objective 1, Actions 1.3 & 1.4 Very important. The registration and designation of assets (i.e. all elements of the watercourse or drainage system that can cause flooding) is an essential starting point to ensuring common understanding and also responsibility with partnership working with other authorities and with private owners. The Strategy should be clearer on how and when registration is being done - it is surely already underway.

Objective 3, Action 3.1; Objective 4, Actions 4.1 & 4.4; Objective 9, Actions 9.2 & 9.3

All very important elements of engaging with communities at medium risk (e.g. Llanfrynach where NRW, Powys CC and private individuals all have a role to play in managing flood risk). All these actions would need to be considered in the process of drawing up a Community Flood Plan. The Strategy should, in our opinion, explain more about preparing a Community Flood Plan as an overarching means of (a) considering and (b) recording for all parties who does what and when with regard to both maintenance of assets (channels, underground drains, culverts etc) and response to a flooding incident. For communities at medium risk, the Community Flood Plan would be largely drawn up by the community itself, but with essential supporting input from Powys CC.

**Q3.** Before reading this draft strategy, our knowledge about the roles that different organisations play in the event of flooding

Very knowledgeable

**Q4.** Whether property (homes or businesses) been affected by a flood in the past in our area

Properties in the Llanfrynach Community Council area have been affected by floods

**Q5.** Our (Community Council's) current level of awareness regarding flooding in our community

We know that our local community has been and is likely to be at risk of flooding in the future

**Q6.** Communication channels we would like you to use to tell us which areas in Powys are generally at risk of flooding.

- Powys County Council Website;
- A newsletter for the affected local community
- Via Community Council
- Via the local media

**Q6a.** If the risk of flooding was more immediate and you were able to communicate this to us, our preferred method would be:

- Contact via the blue light services/agencies working in the area to avert a flood situation
- Other: Local Flood Warden

**Q7.** Details of flood risk that you don't appear to have already captured in the plan.

There are two types of flood risk where the Strategy could be clearer in Section 1.12 'Nature of flood risk in Powys' given the relatively dispersed rural population in Powys. These are:

- (a) Insufficient emphasis on small watercourses and drainage channels (Para 1.12.16 to 19) The heading and following text is confusing as the overarching term is 'rivers'. For rural Powys, flooding of isolated properties and rural roads is often due to lack of maintenance and/or blockages of smaller watercourses and drainage channels, not rivers. As implied in Paras 5.2.49 to 51, some of these issues can be managed by the local community or individuals once they are clear on either their responsibilities or that the flood risk is too small to justify Powys CC regularly maintaining the channel or related asset.
- (b) Insufficient emphasis on rural surface water flooding (Para 1.12.8 to 12, and Table 3.2) what is written in the Strategy (except a brief reference in para 1.12.9) seems to be more oriented towards surface water management associated with Map for Surface Water Flood Risk Areas. For rural Powys, more emphasis should be given to the issue of surface water run-off from rural land impacting directly on isolated rural dwellings. This often occurs where the dwelling is on sloping land and is simply 'in the way of' the surface water flow as distinct from the dwelling being situated in or near some low point.

**Q8.** Our understanding of our responsibilities in relation to flood risk

Role - Town and Community Council    Yes

**Q9.** Our views on desirable actions by Powys County Council in order of priority.

1. Building flood defences in high risk areas
2. Managing assets to reduce risk of flooding
3. Working with planners to ensure new developments don't add to flood risk
4. Working with local communities to help them prepare for flooding
5. Working with riparian owners to ensure proper maintenance of watercourses / other private assets to reduce the risk of flooding
6. Cleaning out road gullies
7. Building flood defences wherever possible

**Q10.** For our 2nd priority, we have the following location:

Stream junctions into roadside drain plus culvert under A40 in middle of Llanhamlach. Flooding due to blockage here has closed the A40

**Q10a.** Other actions that we'd like to put forward

Specific mention of Community Flood Plans as a focus for community action (see Q 2a)

**Q11.** Our confidence that Powys County Council is fully prepared to deal with and carry out its duties with regard to being a Lead Local Flood Authority

Not very confident

**Q12.** Other comments with regard the whole plan

1. It is not clear that Powys CC expects to edit or amend this Consultation Draft of the Strategy in the light of the consultation. We expect this to be done.
2. The Strategy or parts of it are referred to in places as a 'plan'. It's only a high level plan. It must be implemented via specific plans in the light of actual priorities and resources.
3. Considering that resistance and resilience measures are often likely to be the only viable solution to flooding of individual rural properties, the Strategy should give more information about this form of flood risk management and refer to National Flood Forum.
4. With regard to Town and Community Councils (Section 2.12), the Strategy could usefully state that these bodies can act as a focus for the local community in (a) promoting Community Flood Plans, and (b) identifying maintenance issues that could be carried out by the local community (paras 5.2.49 to 51 and Q 7(a) refer).
5. With regard to understanding best practice (para 5.2.54 and Section 10 - References), there should be specific reference to the following two established sources of information:
  - Flood Risk Portal - gateway to local flood risk management information, learning and networking - see [www.local.gov.uk/floodportal](http://www.local.gov.uk/floodportal)
  - National Flood Forum - dedicated to supporting and representing communities and individuals at risk of flooding - see [www.nationalfloodforum.org.uk](http://www.nationalfloodforum.org.uk)

We look forward to hearing about the outcome of the consultation.

Yours truly

**Mrs Barbara Smith**  
**Clerk to Llanfrynach Community Council**