

Mr David J Rowlands AM
Chair of Petitions Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

24 April 2018

Dear David

Thank you for your letter about our Roath Flood Scheme in Cardiff and the petition to save trees and ground in Roath Brook Gardens and Roath Mill Gardens, as discussed at the Petitions Committee on 27 February 2018.

I would like to begin by restating that we at Natural Resources Wales are passionate about protecting and enhancing the environment. Indeed, it is our core purpose, but our duties also include protecting people and property from flooding about which we are also passionate. As such we certainly recognise and identify with the concerns of those who live in the community or use Roath Park Gardens. I wish to reassure you that we would not remove trees unless, in our assessment, it was absolutely necessary. And even then, we would, as in this case, make up for it by replanting replacement trees and planting more trees nearby, as with the 200 saplings we have planted in Roath Recreation Ground.

Please find our reply to each of your questions below.

- 1) Your response to the petitioners' proposal that the current risk of flooding should be recalculated following the completion of Phase 1 and 2 work*

In our opinion the flood risk at Roath Brook Gardens (Phase 3), does not need recalculating following completion of Phases 1 and 2. This is because the risk and measures required to manage it will not change following the completion of Phases 1 and 2.

Properties on Alma Road and Cressy Road are liable to flood solely and directly by flooding from Roath Brook Gardens. These properties would not be flooded by any other flood route at the onset of flooding, such as from Waterloo Gardens. Hence modelling the flood risk from Roath Brook Gardens separately from the downstream parks, is in our view unnecessary, since there is a clear, discrete flood risk from Roath Brook Gardens. These Phase 3 works will reduce the risk of properties being flooded from this distinct risk.

- 2) Further details about the methodology of the options appraisal conducted during the design of the scheme and the results of that appraisal*

Our appraisal followed the Flood and Coastal Erosion Risk Management appraisal guidance which is available here for reference:

<https://www.gov.uk/government/publications/flood-and-coastal-erosion-risk-management-appraisal-guidance>

At the outset of this project we identified a long list of fifteen flood risk management options and considered their initial feasibility. From this assessment, four flood risk management options were short listed for further investigation: Various engineering solutions were considered for each. Options were also considered in combination to achieve the most efficient scheme.

As with all flood management schemes we appraised options on their technical, economic, environmental and social factors, to comprehensively evaluate the benefits, costs, impacts and risks of each. Consultation with stakeholders, such as Cardiff Council, CADW and the community, also informed this initial process, from 2012.

The preferred option selected was to construct new raised defences, with elements of increasing channel conveyance to increase the flow of water away from the potential flood area. The Environmental Report submitted with our planning application provides further details on this process in section 3.2:

https://planning.cardiff.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal= CARDIFF_DCAPR_11_4012.

We consider that our appraisal process was thorough and delivered the best outcome, especially given the many and varied requirements of a complicated flood alleviation scheme. As you will be aware this scheme went through the full Cardiff Council planning process before receiving permission to proceed in April 2016.

3) An update on the outcomes arising from recent discussions with the local community

We continue to have productive discussions with the Roath Brook Trees campaign group to find a way forward.

In addition, we also continue to receive correspondence from residents who wish us to progress and implement this scheme.

After listening to the views of the community and the concerns of the campaign group we have agreed to pause tree felling and construction in Roath Brook Gardens and Roath Mill Gardens, (specifically Phase 3 of the Roath Flood Scheme), for four months from March to July.

This pause will allow the campaign group to further scrutinise our modelling, specifically the hydrology and hydraulic model used to predict the flood risk, and the options appraisal that selected the current design. The campaign group will review Phase 3 and if appropriate submit new evidence. We have committed to listen to the concerns of the campaign group

and to consider any new evidence they might submit to us prior to making a decision on how to progress.

We remain confident of our assessment of the flood risk to the Pen-y-lan and Roath communities and of the need to complete this scheme. We are committed to better protecting the 60 properties affected and those exposed by Phase 3 of this overall scheme. And as this pause allows, we are willing to listen to the community and consider any new evidence.

4) Information about how schemes are prioritised on an all-Wales basis, particularly taking account of the views of the local community

Flood risk management project prioritisation is sophisticated, taking account of a wide array of factors, including flood risk, economic justification, deliverability and funding availability.

Since 2014 we have used a Wales-wide Communities at Risk Register (CaRR), to inform this process: England and Scotland use a similar prioritisation process. This draws on national scale modelling and a preliminary flood risk assessment process to provide a picture of flood risk across Wales. It identifies and ranks areas of interest for us to investigate further in feasibility studies. The CaRR is a very broad high-level tool with a relatively low resolution, functioning by river catchment and communities. It is not appropriate to use this tool at a local scale, i.e. by street, as requested by the campaign group. The data sources are too coarse for such assessment and it would create an inconsistent comparison to other communities in the ranking.

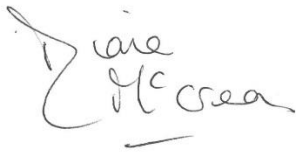
Feasibility studies of individual flood risk areas within a community enable us to understand the specific flood risk, based on property damage, disruption and risk to life, and develop projects as and where necessary. Capital investments are then justified on individual detailed business cases which comply with the economic justification rules of UK Treasury. This can be irrespective of a community's position on the CaRR. Each project undertakes a detailed analysis of the flood risk to individual homes, businesses and infrastructure and follows the appraisal process to identify a preferred option. All projects are then still subject to Welsh Government prioritisation and funding settlements for each financial year.

I hope that these responses give you the answers you were seeking. We would of course be happy to answer any further questions.

Finally, having viewed the recording of the committee meeting, we feel it is important to point out that several of the statements and comments made by committee members, in public, were factually incorrect and some had little basis in evidence.

Given that we are an evidence-based organisation, and as detailed above, this scheme has been proposed based on careful analysis of the best evidence and due process, we are disappointed that these factually incorrect comments are now a matter of public record. Please see our concerns on the attached addendum which we have included so that a balanced and accurate record exists publicly.

Yours sincerely

A handwritten signature in black ink that reads "Diane McCrea". The signature is written in a cursive style with a large initial 'D'.

Diane McCrea MBE
Cadeirydd, Cyfoeth Naturiol Cymru
Chair, Natural Resources Wales