

P-05-801 Save the trees and ground in Roath Mill and Roath Brook Gardens before it's too late, Correspondence – Petitioner to Committee, 17.06.20

Your e-mail enclosed a copy of the letter received from Natural Resources Wales dated 29th March 2020 inviting our comments. Representatives of the group met with Natural Resources Wales in early March 2020 when we were informed of the results of the re-assessment and in advance of the public announcement (a copy of which appears below).

Whilst we are naturally pleased with the results of Natural Resources Wales re-assessment, in that further destructive works to the parks appears unlikely, there remain a number of issues of concern which we believe the committee should be aware of.

1. The letter states that the reassessment has been completed. The group asked NRW for a copy of the report at the meeting in March and it was agreed that it would be disclosed. This has not yet been provided and after being chased earlier this month we were informed on 8 June that *"The report is still a Final Draft and cannot be published formally until it has been through a final internal validation exercise. Unfortunately, the huge amount of work that has fallen out of the February flooding has delayed the final validation. Whilst the validation will not change the outcome ... it is likely to be several weeks before the staff who can carry out the validation will be available, due to their February Flooding priorities."* Whilst we have been promised a copy of the final report we would ask the Committee to also request a copy of the same and monitor the progress of this final validation exercise.

2. Whilst the letter to the committee states that number of properties subject to a "1 in 75" flood risk has reduced, it does not state the size of that reduction. The re-assessment undertaken by NRW actually reduces the number of properties said to be at a "1 in 75" flood risk from approximately 70 properties to 11 properties (see NRW announcement below). This is obviously a very significant reduction.

3. The stated reasons for the reduction are:
a) the new Footbridge built in Roath Brook Gardens by Cardiff Council; and
b) the work completed downstream (phases 1 & 2)

In response we would note:

a) In relation to the footbridge it was installed in 2013, before NRW commenced its design works in March 2014 and over 4 years before the works were actually due to commence. It is obviously concerning that something which appears so fundamental had not even been noticed, let alone its effect considered throughout this time. Further it is worth noting that in their appraisals none of the reports suggest a change in the footbridge as one of the measures that could be taken to cause a dramatic change in the flood risk. A change in footbridge could, of course, have been recommended at a far lower cost to the environment and the public purse. The committee will recall that they were told on a number of occasions by NRW that a thorough and comprehensive review of the risks and options was undertaken before they decided that the significant environmental impact of this scheme was the only option.

b) A re-assessment due to the work completed downstream was one of the central requests the Campaign Group made from the start (along with taking account of the environmental damage). As the members of the committee will recall NRW asserted throughout this matter that a re-assessment was not required because the work completed downstream would have no impact on the flood risk on the houses affected by Phase III. In that regard we would refer by way of example to the response to point 1 in the letter from NRW to the Chair of the Committee dated 24th April 2018. NRW could not have been more explicit in stating *“the risk and measures required to manage it will not change following the completion of Phases 1 and 2”*. Further, even when they reluctantly agreed to re-assess, NRW continued to state that they remained *“confident of [their] assessment of the flood risk in the area.”* (NRW Letter to committee dated 29th January 2019). It is clear now that their confidence was misplaced and further that they may have misled the Petitions Committee on fundamental points.

4. The Campaign Group has no desire to point to individual mistakes which may have occurred in this matter, or create scapegoats, but we are concerned that the manner in which the local residents were treated could be repeated in areas where locals may not have the opportunity or ability to challenge NRW’s actions. It is therefore important that NRW acknowledge the mistakes which were made, and learn from them, to ensure that they are not repeated. In that regard we have offered to engage with NRW in relation to helping shape future consultations and have been provided with contact details of a third party to engage with. We contacted that third party on 30th March but have not heard back (although we acknowledge this may be COVID related).

We would therefore request that the Committee continue to monitor the position to ensure a suitable outcome for all involved. If the Committee require any further information please do not hesitate to contact us.

Regards

Friends of Roath Brook

Appendix: Text of NRW announcement ([re-assessment-of-cardiff-flood-scheme-completed](#))

Re-assessment of Cardiff flood scheme completed

Natural Resources Wales (NRW) has completed its re-assessment of the flood risk in the Pen-y-lan area of Cardiff.

The first two phases of the Roath Brook Flood Scheme have reduced the risk of flooding to more than 300 homes and businesses in the area.

The final part of the scheme to reduce flood risk to the remaining properties around Roath Brook and Roath Mill Gardens has been on hold since December 2017.

Since that time NRW worked with the Friends of Roath Brook campaign group and in January 2019 agreed to re-assess the final phase as a separate piece of work.

The re-assessment considered the work already completed downstream and the new footbridge built in Roath Brook Gardens by Cardiff Council.

The footbridge was constructed after the original flood risk was assessed but formed part of the design for the works in Roath Brook Gardens as part of the wider scheme.

The initial result estimates the number of properties at flood risk during a 1.33% (1 in 75) chance flood event has reduced to 11. NRW remains committed to working with partners and the community to find a solution to manage the flood risk.

Tim England, Operations Manager for NRW, said:

“Following our re-assessment, there are properties in the area that remain at flood risk, and this risk will only increase due to climate change.

“There may be a way to address this remaining risk as part of work that Cardiff Council is considering at Roath Park Lake, upstream of Pen-y-lan.

“We are discussing this with Cardiff Council and won’t consider further work in Roath Brook and Roath Mill Gardens until these discussions are finalised.

“We will inform the local community once this work is complete and what options we have to address the remaining risk.”