

The comments below are in a response for detail concerning Welsh Government's response to flooding events. The detail is for consideration and where necessary for inclusion in a WLGA report to include responses from other Welsh Local Authorities. The response focus on the 4 key areas as numbered below and as set out in the request for information.

1. Whether the current level of funding provided by the Welsh Government for flood and coastal erosion risk management (FCERM), and for relevant authorities to provide emergency flood response, is sufficient;

Revenue Funding

- 2019/20 £105,000
- This grant covers statutory activities under the Flood And Water Management Act 2010 as Lead Local Flood Authority, which include:
 - o SuDS Approving Body (SAB)
 - o FRMP & LFRMS activities
 - o Asset maintenance, inspection, recording and mapping
 - o Flood investigations
 - o Training
 - o Software etc.

Current levels of funding do not allow Monmouthshire CC as the LLFA to deliver the current demand on the in-house Flood Team. Additional revenue funding is required to support the following activities:

- Staff costs for investigation, studies and scheme development works associated with the response to the devastating flooding experienced during winter 2019/20. These flood events have resulted in a significant increase in workload which requires additional funding to undertake the necessary investigations, reporting and scheme appraisals. Without further funding, delays in completing Section 19 reports and promoting flood schemes are inevitable unless additional resource can be employed.
- Asset inspections and recording – Current levels of funding hamper the quantity of drainage investigations which we are able to undertake. Additional funding would secure resource to undertake additional activities such as CCTV surveys, culvert capacity checks etc., asset recording etc.. Following the winter flood events of 2019/20 we have seen a significant increase in demand within this area.
- Staff costs associated with the role of SUDS Approving Body - workload has doubled during 2020 compared to 2019 when Schedule 3 was enacted. No additional financial support has been received which has significantly drained staff resources and reduced capacity to manage and respond to flood events.

Annual allocations of Revenue funding make it very difficult to forward plan workload. If certainty of funding for staff resource could be provided, appointments over 2-3 years could be made to cover elements of work that span financial years i.e. scheme assessment & development, activities associated with Flood Risk Management Plans and Local Flood Risk Management Strategies etc.. Longer term settlements will also support programmes of works associated with asset maintenance and inspection.

The majority of communities affected by flooding in Monmouthshire during winter 2019/20 were flooded from main rivers. MCC as Lead Local Flood Authority are limited as to what we can do to resolve these issues from main river flooding and are largely reliant on Natural Resources Wales (NRW) to react and assess potential mitigation options. As well as our own resource limitations we are aware of the limited resources available to NRW to respond to such large events which spanned much of Wales last winter. Additional funding is therefore required across all RMA's to work collaboratively to protect our communities. With more frequent flood events, workloads of LLFA's and RMAs will only increase, the costs of which need to be met by sufficient levels of funding.

Capital

- Current levels of funding are generally sufficient. MCC have generally been successful in receiving the required grant funding through scheme applications. Recent flood events have identified the need for more flood schemes which will require greater future capital investment.
- The Small Scheme Grant has been beneficial for the typical smaller schemes in Monmouthshire.
- Grant Received:
 - o Last 3 years £159,879
 - o 2019/20 - £127,500
 - o Total - £287,379

Recent changes to the Small Scheme threshold to allow allocations to LLFA's of >£100k was welcomed and much needed. As with larger capital schemes, a significant increase in the number of small schemes required annually is anticipated. We are currently developing a 5 year forward programme of small schemes which will require additional grant support to deliver along with experienced staff resource and expertise to manage these projects. The ability of this grant to span financial years would be beneficial.

As outlined above, the current level of investment limits what can be achieved by LLFA's and RMA's. When we experience significant flood events there is very little to no staff resource readily available to adequately respond without diverting resource from other areas. This has a knock on effect and threatens the ability of LLFA's to deliver their statutory duties under the Flood and Water Management Act 2010. Work associated with the response and recovery to a major flood event takes months even years to deliver. The effects of the Winter 2019/20 events will be felt for years to come in Monmouthshire and require a continued increased level of investment to adequately respond. This work has to take place alongside "the day job" and whilst delivering other key statutory functions related to FCERM.

DAF Grant

Financial assistance provided directly to residents through the DAF scheme was welcomed by

residents. Approximately 150 properties benefitted from this scheme in Monmouthshire. Monmouthshire CC were required to administer this financial aid scheme, process applications and check properties were flooded, which required significant input from staff across the Authority. The substantial costs associated with this work have not been recovered and are not eligible under the EFAS grant. Future schemes should take account of this and allow Authorities to employ additional resource and re-cover all such costs.

2. Whether more emergency funding will be necessary to assist local authorities to deal with flooding this winter;

If another wet winter is experienced with regular or significant flooding, yes, additional funding to undertake emergency repairs, clearance and inspections will be required. Such flood events also require a significant volume of post event input through Section 19 reports, residents meetings, scheme assessments and development etc. which current levels of revenue funding do not cover.

LLFA staff are already fully utilised with statutory duties with next to no capacity to drop workloads and respond to major flood events without causing delays in other areas. Any further notable flooding this winter which requires a response from staff during and post event(s) through inspections, reports, scheme promotion etc. would require additional financial support.

Monmouthshire CC were successful in applying for £101,525 through the Emergency Flood Response Grant in February 2020. This grant covered essential work undertaken during the initial response to the flood events and was very welcomed. The grant however required all costs to have been incurred and claimed by the end of March 2020. At this time we were still experiencing flooding and the aftermath of Storms Ciarra, Dennis & Jorge. Whilst this grant covered a lot of the culvert and watercourse works, much of this work was still ongoing and could not be recouped through the grant. We subsequently tried to re-coup the costs through the EFAS grant which was unsuccessful due to the threshold limits as outlined above. Such grants need to be more flexible in terms of end of financial year's restrictions to accommodate ongoing events.

3. Whether local authorities are sufficiently supported to recover from a major flooding event, undertake any necessary investigations and make changes needed to manage the risk of a recurring event

As outlined in 1. above, current levels of funding and resource make responding to major flood events very difficult. Such events generate huge volumes of workload through the initial response phase to investigations, reporting, public engagement, scheme development etc.. Public perception is often that a flooding problem should be resolved immediately after the event, where in reality it can be years later. Further investment can allow LLFA's & RMA's to manage the expectations of individuals more effectively and to assess and deliver flood alleviation options in a more timely and cost effective way.

In terms of funding to recover costs associated with major flood events, Monmouthshire CC

have sought funding through the EFAS scheme which has identified a number of issues. A general observation of the EFAS scheme is that it has to be activated by Welsh Government for a particular event. Therefore Council's currently do not have any certainty that they will be supported financially when faced with a serious event.

Specifics in respect to the February floods:

- When the scheme was activated we were led to believe that Ministers had indicated that there was some flexibility in the scheme. Councils were encouraged and advised to register even if costs were not expected to exceed their threshold.
- Councils were also encouraged to award additional reliefs for Council Tax and Business Rates to homes and businesses affected by the floods and to include these in the EFAS return (the expectation was that these would be fully funded)
- From the contact we had with Welsh Government colleagues, there was an expectation that the usual thresholds would not apply. However this turned out not to be the case. When the EFAS terms and conditions were released towards the end of March 2020 the standard thresholds were applied along with the 85% rule on eligible expenditure. (This also applied to the Council Tax and Business Rate element of the claim).
- Compiling the claim was a significant piece of work and involved Officers from across the Council, with Welsh Government requiring a detailed list of the work undertaken. The result of this exercise was a payment of just £6,857. It really was not worth all the effort for such a small sum of money.

At the same time as compiling the EFAS claim, Councils were also being asked to identify the recovery costs of the floods (split over 3 financial years). This information was submitted to Welsh Government in May 2020. We have only recently been given the go ahead (mid September) to start this work and for 2020/21 only. Again, as with EFAS, the guidance is patchy and incomplete making it very difficult for Councils to plan both the work and their finances.

The main sticking point appears to be that Welsh Government are looking to the UK Government to provide funding for these emergency schemes. Delays in agreeing this funding has a direct impact on councils, who are dealing with the effect of these events in real time. This all makes it very difficult for Councils to plan and manage their resources.

With regard to managing risk of recurring events, Welsh Government are aware of the issues with private un-adopted flood bunds which breached in Monmouthshire during Storm Dennis & Jorge. These events, most notably in Llanbadoc, Llanwenarth and Prioress Mill Lane Usk, resulted in significant and life threatening flooding to many properties. With the exception of Llanbadoc, which has now been recognised and formally adopted by NRW as their asset, the remaining locations remain in a state of uncertainty.

Despite some repairs being undertaken, residents remain in a state of extreme anxiety and

consciousness that repeat flood events could result in a catastrophic failure of these defences again, and that a repeat of the devastation caused during winter 2019/20 could re-occur.

All parties recognise the need for such defences to be assessed, monitored and inspected as they are key assets in protecting property and life. As these structures form a defence from main river flooding, Monmouthshire CC are not in a position to formally undertake the above. Funding, which can only be released from Welsh Government, is required to allow Natural Resources Wales as Risk Management Authority, to undertake the appropriate assessments of these structures, with a view to undertaking the necessary improvements to allow them to be formally adopted and placed on a cyclic inspection and maintenance regime.

As the first point of contact for our residents affected by flooding, Monmouthshire CC has continued to raise concerns over this with NRW and Welsh Government. Unfortunately the issues and concerns held by residents remain, with no resolution in sight. Greater support from Welsh Government in recognising the need for swift action and financial assistance to deal with such issues should be realised following last winter's flooding and during similar future flood events.

4. How effective the Wales Flood and Coastal Erosion Committee is in providing an advisory and coordinating role to Welsh Government.

We as LLFA have not had any direct dealings with the FCERM Committee nor are aware of the how effective they have been with advising Welsh Government. More details of the Committee's meetings including Agendas and minutes would be welcomed.

In addition to the main funding streams for FCERM, additional funding is required for Local Authority Highway teams to manage surface water drainage systems effectively. We are already experiencing more frequent year round heavy rainfall events in Wales with the situation only going to get worse. Rural highway drainage systems in particular are more frequently being called upon to cope with overland runoff, for which they are not designed to cater for. With cuts to highway budgets over many years, little or no proactive inspection or maintenance is not uncommon on these drainage systems. Effectively they are falling into a state of disrepair and require significant investment to restore and upgrade to cater for larger rainfall events brought about by climate change. These highway drainage systems often form a crucial role in flood prevention and should be treated as flood defence assets where they provide such a function. Additional funding specific to these assets is required to ensure communities are protected from effective surface water drainage systems that are fit for purpose.

As part of this review elected Members have been consulted and have raised the following additional points for inclusion in this submission:

- Improved funding for highway drainage systems and watercourses required
- Funding to repair damaged road surfacing is required post flood events
- On the preventative side maintaining clear planning policies on not having future residential developments in flood zones and not to pursue the technical risk based

approach being proposed for TAN15 and to have a zero tolerance approach to building in areas which are at risk of flooding.

- The Welsh Government should always provide the full resources on a claim basis to cover the impact and costs of flooding for local authorities. There may also be hidden later costs of flooding events. For example the drainage replacement and resurfacing. So the deadline for claims needs to be left open for some time after the flooding event so its true cost implications can be properly assessed.
- A fund to cover emergency accommodation for residents who have had to evacuate their homes is required. This can be for periods of over 12 months in some cases.