

# Appendix D Public Consultation Review: Flintshire Local Flood Risk Management Strategy 2025 (LFRMS 2025)

## Dates of Consultation:

The public consultation ran from 25/06/2025 to 30/07/2025

Method(s) of Engagement: Online survey hosted on Flintshire County Council website, available in English and Welsh languages.

Key stakeholders including, but not limited to Risk Management Authorities, Neighbouring Local Authorities, Elected Members, Welsh Government and Welsh Local Government Association and active Local flood risk management groups were notified about the consultation via email, with a digital link to the survey included in both languages.

Individuals who are unable to complete the survey online could visit any Connects Centre where support was available. Connects Centres were open 9am to 4.30pm on the following days: Buckley: Tuesday, Wednesday, Thursday, Connah's Quay, Flint and Holywell: Monday to Friday and Mold: Monday, Wednesday, Friday

## Responses

Total number of responses: 7 responses were recorded via the online survey, with an additional response received via email.

While the consultation captured valuable local knowledge, engagement was skewed toward certain villages, homeowners, and informed residents, with limited input from businesses, and other external stakeholders such as Risk Management Authorities.

## Summary of proposed changes to LFRMS following the consultation

- A detailed table outlining the roles and responsibilities of Risk Management Authorities (RMAs) will be added for greater clarity.
- The Policy Action Plan will continue to be revised and published annually on the Council website to improve transparency and track progress.
- No changes will be made to the North Wales SuDS Guide, which is a jointly produced, approved document available online.
- The question on Sustainable Drainage Approval Body (SAB) requirements remains to raise awareness of legislative changes since 2019, with further information provided via Flintshire's website.
- Appendix F "FRMP Outputs" will be amended to accurately reflect Main River flood risks within the Bretton Communities at Risk Register (CaRR) area.

**Q1. Who answered the survey?**

Response	Number of respondents
Other (please specify)	0
A Risk Management Authority	1
One of the emergency services	0
A local elected member / councillor	2
Business Owner	0
Local group representative	1
Resident	3

**Q2. What postcode do you live/work in?**

Number of responses	Area	County
2	Mold	Flintshire
1	Mold / New Brighton area	Flintshire
3	Broughton	Flintshire
1	Broughton,(near Chester / Airbus	Flintshire
1	Denbigh	Denbighshire

**Q3. Have you ever experienced flooding in your home or workplace?**

Response	Percentage of respondents
Yes, both internal property and external flooding	14.3%
Yes, external flooding only (road, garden/outbuildings/garage)	14.3%
No	71.4%

**Q4. Do you live in an area of flood risk\*?**

Response	Percentage of respondents
Yes, flood risk shown on NRW online maps	28.6%
Yes, flood risk is not shown on NRW online maps	0%
No, flood risk is not shown on NRW online maps	71.4%

*\*The Natural Resources Wales (NRW) flood risk maps offer an indicative overview of areas at risk of flooding from sources including: main rivers, the sea, reservoirs, and surface water. However, it is recognised that these maps are not exhaustive and may not capture all local flood risks.*

**Q5. What are your main concerns relating to flood risk management?**

No.	Response	FCC comments
1	<p>Hendre - the main items of concern are the regular flooding along Mill Terrace and Lloyd Terrace, Rhydymwyn.</p> <p>- Overflowing private culvert system discharging towards Rhydymwyn on the A541 from the Mold side of the Rhosesmor junction.</p> <p>Cilcain - the main item of concern is the overflowing of water down Mountain Road Mountain Road and the resulting need to have a new gulley system down Mountain Road, past the village car park, turn left at the Square and join up with the existing system in front of the Chapel.</p> <p>General - the main item of concern is the lack of routine maintenance leading to blocked gullies and culverts</p>	<p>Hendre is captured on the Strategy Action plan, Ref 11 and Cilcain Ref 06.</p> <p>Full consultation response has been shared with Flintshire LLFA Flood Investigation Officer for further investigation as part of the wider “Hendre FBC” scheme. Hendre OBC was submitted to Welsh Government in March 2025. An expression of interest for external funding to support the development of a scheme for Hendre was submitted to Welsh Government in December 2025.</p>
2	<p>We live part way down Clayton road in Maes-y-march, on 2 occasions of heavy rainfall the culvert at the junction of Clayton road and queens park has not been able to cope with the water due to poor management and as a result the overflow comes down Clayton road at speed and for whatever reason kicks left into Maes-y-March which in turn fills up and has flooded a number of properties and also required the fire and rescue teams to evacuated a number of residents</p>	<p>Broughton is captured on the Strategy Action plan Ref 12a, 12b, 12c.</p> <p>Full consultation response has been shared with Flintshire LLFA Flood Investigation Officer for further investigation.</p> <p>NRW Flood Map highlights the risk described at this location from heavy rainfall.</p> <p>This area forms part of a wider flood scheme for Mold which is currently being reviewed by Welsh Government.</p>
3	<p>Members of the Broughton and Bretton Flood Group have multiple concerns about flood risk management in our area of Flintshire a few examples of which are noted here: in our experience little support has been made available to residents during flood events; any response from local authorities/organisations has been slow in coming; Flintshire County Council seems unable to provide even the most basic routine maintenance on existing drainage systems/highways to reduce the risk of flood; over the years</p>	<p>Broughton is captured on the Strategy Action plan 03a, 03b with ongoing schemes to promote trash screen improvements, Natural Flood Management and the developmental of a flood scheme for the Broughton area subject to Welsh Government funding and local landowner agreement. It should be noted that the delivery of a flood mitigation scheme by the Environment Agency (EA) or Natural Resources Wales (NRW) typically takes several years from inception to completion. This reflects the need for detailed hydraulic modelling,</p>

	<p>decisions made by local planners do not seem to have been informed by TAN 15 and extensive development has occurred that has impacted water storage capacity in the area and increased the threat of flooding; the long standing NRW policy of ‘no dredging’ has resulted in river drains and the river becoming heavily silted, further limiting water storage at times of heavy rain and during storm events. Some of the problems identified are as a consequence of inadequate resource being made available.</p>	<p>options appraisal, environmental assessment, public consultation, funding approval, landowner negotiations, and statutory consents, followed by detailed design and construction.</p> <p>As a result, even relatively small-scale flood mitigation schemes can commonly take between 5 and 10 years to progress from initial identification to delivery, with more complex schemes taking longer.</p> <p>It is a positive step that the Broughton and Bretton Community Flood Group has been established and is working in partnership with the LLFA and other Risk Management Authorities, including the Highways Authority.</p>
<b>4</b>	<p>Several people in the area are made homeless for long periods. This effects their mental health. Property prices decline.</p>	<p>The Council recognises that flooding can have significant and long-lasting impacts on affected residents. In some cases, individuals and families may be displaced from their homes for extended periods, which can have a detrimental effect on mental health and wellbeing. Flooding can also cause concern regarding property condition and perceived impacts on property values.</p> <p>The Council does not underestimate these impacts and continues to work with partner organisations, including Natural Resources Wales and other Risk Management Authorities, to reduce flood risk where reasonably practicable and to support communities affected by flooding.</p>
<b>5</b>	None	<b>n/a</b>
<b>6</b>	None	<b>n/a</b>
<b>7</b>	None	<b>n/a</b>
<b>8</b>	None	<b>n/a</b>

**Q6. How clearly does section four of the LFRMS describe the roles and responsibilities?**

<b>Response</b>	<b>Percentage of respondents</b>
Very Clear	28.6%
Somewhat Clear	28.6%
Not Clear	42.9%

**Changes to document:**

*The existing document includes a pictogram of the main RMAs and their roles and responsibilities in response to each flooding type.*

*For additional clarity the following table will be added to the document.*

<b>Risk Management Authority (RMA)</b>	<b>Main Flood Responsibilities in Wales</b>
Welsh Government	Sets national flood and coastal erosion risk management policy and legislation; provides funding; oversees RMAs and national strategy.
Natural Resources Wales (NRW)	Manages flood risk from main rivers, the sea, and reservoirs; issues flood warnings; maintains and operates major flood defences; provides flood risk mapping and advice.
Lead Local Flood Authority (LLFA) (County or County Borough Council)	Manages flood risk from surface water, ordinary watercourses, and groundwater; investigates significant flooding incidents; maintains asset registers; produces local flood risk management strategies.
Local Planning Authority (LPA)	Ensures flood risk is considered in planning decisions in line with national policy (TAN15); applies development control to avoid inappropriate development in flood-risk areas.
SuDS Approval Body (SAB) (within the Local Authority)	Approves, adopts, and enforces Sustainable Drainage Systems (SuDS) for most new developments; ensures surface water is managed sustainably before construction begins.
Highway Authority	Manages flood risk from highway drainage systems, including gullies and roadside drains; responds to flooding affecting the public highway.
Water and Sewerage Companies	Manages flood risk from public sewers; maintains and upgrades sewerage infrastructure; responds to sewer flooding incidents.
Landowners / Riparian Owners	Responsible for maintaining ordinary watercourses on or adjacent to their land to allow the free flow of water.
Emergency Services & Local Resilience Forums	Respond to flooding emergencies; coordinate evacuation, public safety, and recovery during severe flood events.

**Q7. To what extent do you agree or disagree with the proposed policy action plan (key priorities areas)?**

Response	Number of Respondents
Strongly disagree	2
Disagree	0
Neither agree or disagree	0
Agree	3
Strongly Agree	2

**Please state which Policy Actions you disagree with and set out your reasons:**

- Improve understanding of local flood
- Improve communication
- Increase preparedness and resilience
- Minimise the risk and impacts of flooding and coastal erosion to individuals, communities, businesses and the environment
- A sustainable and holistic approach
- Where possible, prioritise investment to the most at-risk communities
- Provide appropriate and effective flood investigations
- Use knowledge and data to inform planning decisions, SABs and policy formation

I can find no evidence of these objectives being progressed.

As a Local Councillor we regularly in receipt of complaints of local flooding going back 20 years which remain unresolved. Recent Minutes examples have *been redacted from this document*. They include two examples of locations where there is a private drainage issue which can be resolved privately by the landowner via Land Drainage Tribunal Wales ([www.agriculturalandtribunal.gov.wales](http://www.agriculturalandtribunal.gov.wales)) if not resolved via a discussion with the adjacent landowner. Highlighting the complexities of flood risk management and responsibilities to manage flood risk in Wales.

**Changes to document:**

None. The action plan will be revised and published annually on Council website to ensure transparency and help to track actions.

**Q8. How suitable are the actions in the Policy Action Plan for delivering the objectives?**

Response	Number of Respondents
Don't know	2
Not all suitable	1
Not very suitable	0
Somewhat suitable	3
Suitable	1

**Response:**

*The LLFA acknowledges the feedback regarding the suitability of actions in the Policy Action Plan.*

*The LLFA will continue to work with partner agencies to ensure that actions are realistic, achievable, and will seek additional resource / external funding where available to monitor progress to ensure the objectives of the plan are met.*

**Changes to document:**

None. The action plan will be revised and published annually on Council website to ensure transparency and help to track actions.

**Q9. Do you agree with the actions proposed for your area?**

<b>Response</b>	<b>Percentage of respondents</b>
Yes	33.3%
No	66.7%

**Q10. Are there other actions you would like to see proposed for your area??**

No.	Consultation Response	Action Plan Ref	FCC Comment
1	<p>Hendre - the main items of concern are the regular flooding along Mill Terrace and Lloyd Terrace Rhydymwyn.</p> <p>Cilcain - the main item of concern is the overflowing of water down Mountain Road Mountain Road and the resulting need to have a new gully system down Mountain Road, past the village car park, turn left at the Square and join up with the existing system in front of the Chapel.</p> <p>General - the main item of concern is the lack of routine maintenance leading to blocked gullies and culverts</p> <p>Further emphasis required re the need for improved routine maintenance</p>	Hendre 11 Cilcain 06	<p>Both areas are included in the FCC Community Specific Action Plan.</p> <p>General - We acknowledge the concerns regarding blocked gullies and culverts. Multiple RMAs are responsible for different parts of the network, and routine maintenance is prioritised subject to available funding. Improvements in asset management are enabling more targeted and proactive maintenance, helping to reduce blockages and their impacts where resources allow.</p>
2	For reasons previously stated we are unable to comment on the detailed actions.	n/a	
3	My area Broughton and Bretton isn't mentioned in the plan which is very disappointing as there were over 40 properties with issues. Too many agencies involved with different policies should be one governing body overseeing the whole thing. Too much repetition and lot of money spent in different sector making policies and this could be reduced.	Bretton 02 Broughton 3a and 3b	<p>Both areas are included in the FCC Community Specific Action Plan.</p> <p>It is acknowledged that the management of flood risk in Wales is complex; however, as a Council, we endeavour to manage this within the established legal framework.</p>
4	Some means of measuring and communicating the results of these desirable actions.		The action plan will be revised and published annually on Council website to ensure transparency and help to track actions.

**Changes to document:**

None, areas are covered by existing Action Plan. The action plan will be revised and published annually on Council website to ensure transparency and help to track actions.

#### Q11. Comments on the North Wales Sustainable Drainage (SUDs) guide

No.	Consultation Response	FCC Comment
1	This needs reviewing and updating with the working difficulties and ownership - responsibilities of collating information but back on the developer. The guide itself is good, but I think there could be more on the developer to ease the workload of the SAB teams.	The LLFA will work with partners to ensure the guide remains a practical, accessible resource that supports effective surface water management and compliance with sustainable drainage requirements.
2	No	n/a
3	It says same thing which bodies should be doing what and what they should be doing but they are not. Like dredging streams and culverts. It is all well and good saying who is responsible for what on paper but in reality this isn't being done! There should be more accountability and a body that actually monitors where and when repairs and maintenance is carries out.	The North Wales SuDS Guide is intended to provide clear, consistent guidance on the expectations, requirements and processes for the design, approval, construction, operation and maintenance of sustainable drainage systems (SuDS) across the North Wales region.
4	In Wales, County Councils have a statutory duty as Sustainable Drainage Approval Bodies (SABs) to manage surface water from developments. There is little evidence of this policy being implemented.	Flintshire CC supports the <a href="http://www.sabsociety.wales">www.sabsociety.wales</a> and reports annually to the WLGA SAB survey which monitors the number of adoptions and approval granted by each of the 22 Local Authorities.

#### **Changes to document:**

None. The North Wales Suds guide is a shared document written on behalf of the North Wales Flood Risk Management Group (NWFRMG) by Arup Consulting Engineers. The document has since been approved by the group for publication is available online.

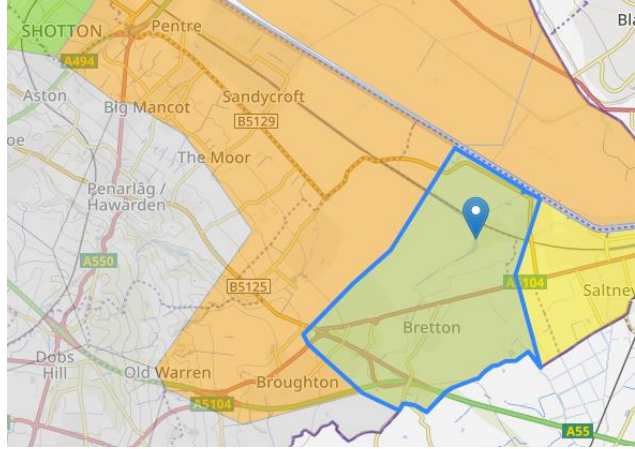
**Q12. Were you aware that since 2019, all new development within Flintshire of more than one house or where the construction area is of 100m<sup>2</sup> require sustainable drainage to better manage on-site surface water and reduce flood risk?**

<b>Response</b>	<b>Number of respondents</b>
Yes	5
No	2

**Changes to document:**

None. This was question was designed to raise awareness of the new SAB requirements in Flintshire and across Wales since legislative change in 2019. Further details available online: [www.flintshire.gov.uk/en/Resident/Planning/Sustainable-Drainage-Systems.aspx](http://www.flintshire.gov.uk/en/Resident/Planning/Sustainable-Drainage-Systems.aspx) (opens in a new window).

**Q13. Do you have any other suggestions for improving the Local Flood Risk Management Strategy?**

No.	Response	FCC Comment
1	Yes, clear the drains and culvert more frequently	Multiple RMAs are responsible for different parts of the network, and routine maintenance is prioritised subject to available funding.
2	<p>We welcome the clarity of information contained within the document which will help to better inform and educate its broad based target audience including the authorities and organisations referenced within it. Combining what were previously two separate documents into a single publication now provides readers with a greater level of detail, not only in relation to future directions, roles and responsibilities but most importantly, measurable outcomes which should undoubtedly bring about greater accountability. We are sure that climate change has acted as a spur to many local authorities and it is unfortunate that such a serious response has been so late in coming to Flintshire.</p> <p>We have some questions/comments:</p> <p>(i) would it be possible to include a map showing the river, river drains and watercourses in Flintshire?</p> <p>(ii) in relation to the omission of Broughton from the document. Part of this village suffers from flooding from small watercourses and surface water and residential properties have suffered damage as a consequence of both Storms Christoph and Babet. Has this been a deliberate omission or are statistics included within those from Bretton?</p> <p>(iii) Bretton is shown as an inland flood risk area in Flintshire and is listed as area M. On the risk receptor tables Bretton is at risk from flooding from surface water and small watercourses. We are confused by this as we were under the impression that the Mold Junction, Bretton and Higher Ferry Drains, all maintained by NRW were part of the main river system? We</p>	<p>In response the points raised:</p> <p>i) Fluvial mapping is not included in this document for the area of Flintshire (437 km<sup>2</sup>) due to viability issues associated with representing multiple watercourses at the scale required for effective visualisation. NRW hosts digital maps of main rivers online: <a href="http://www.datamap.gov.wales/layers/inspire-nrw:NRW_MAIN_RIVERS">www.datamap.gov.wales/layers/inspire-nrw:NRW_MAIN_RIVERS</a></p> <p>i) In Appendix F FRMP outputs; the CaRR areas Bretton has a named area, however Broughton is situated within the named CaRR area “Queensferry-Sandycroft-Manor Lane” this merely reflects the naming convention of the CaRR areas, which we understand may be confusing. As such the number for Broughton are included in the “Queensferry-Sandycroft-Manor Lane” CaRR and the number for Bretton in the “Bretton” CaRR.</p> 

	would therefore have said that Bretton is at risk of flooding from the river, small watercourses, surface water and the sewer system.	iii) Upon review of the CaRR map, I agree that the main rivers—High Ferry Drain, Mold Junction Drain, and Bretton Drain—should all be included within both the Bretton and Lache CaRR areas. Accordingly, the FRMP will be amended. As part of the Bretton OBC, a detailed modelling study was undertaken and submitted to the Welsh Government, providing more comprehensive details than those contained in the summary FRMP.
3	Yes increase the amount of staff on planning so they can actually scrutinize the planning applications from developers and individuals to check flood risk areas. This isn't carried out quite often due to lack of staff.	As of Autumn 2025, joint replies to planning consultations have been made by the Lead Local Flood Authority (LLFA) and the Sustainable Drainage Approving Body (SAB), helping to strengthen scrutiny of planning applications in relation to flood risk despite ongoing staffing constraints.

**Changes to document:**

Amend Appendix F “FRMP Outputs” to reflect the Main River risk in the Bretton Communities at Risk Register (CaRR) area.

