

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

24 January 2018

Dear Mr Rowlands,

Thank you for your correspondence on the above petition. We are obviously aware of the high interest in the proposed part of our flood scheme in Roath Mill and Roath Brook Gardens, including the petition. For several months, we have engaged with residents of Penylan and representatives of the #RoathBrookTrees campaign group to try to understand, address and resolve their concerns. In addition, and in order to try to move forward on those concerns, we have also held meetings with local elected representatives and the Welsh Government Minister for the Environment and her officials.

A number of issues are raised in the petition. For reasons of clarity and completeness we aim to address each point in turn using the text of the petition.

As local residents, we believe that the planned flood works in Roath Mill Gardens and Roath Brook Gardens in Penylan, Cardiff are unnecessarily destructive.

We do understand the concerns that have been raised. Our aim is to give the same level of flood protection to the people and properties in Roath Mill Gardens and Roath Brook Gardens as will be provided to others in the wider community at risk from flooding. We have always recognised that there would be a short-term impact from the construction works and have done our utmost to minimise that impact. We believed that in undertaking an extensive options appraisal exercise for the whole scheme, followed by what we considered to be extensive public consultation - before submitting and receiving planning permission from the local planning authority - we had shown that our proposals were needed and proportionate. We do not share the view that our scheme is 'unnecessarily destructive' and in fact we believe it is the least that needs to be done in order to give the required level of protection from future flooding. As part of gaining planning permission there is an agreed level of restoration of the park in line with the character and nature of the Edwardian park/gardens.

We have seen the devastation of Waterloo Gardens and oppose Phase 3 of Natural Resources Wales' Roath Flood Scheme, which will widen the brook in Roath Mill and Roath Brook Gardens and see the felling of over 30 trees in an area where there has never been any flooding in the past.

At the outset of this project we undertook a thorough investigation of many options to achieve the desired levels of protection before we concluded that the most effective, and least impact option, was to widen the brook. In widening the brook and to put in place replacement banks, it is inevitable that we would have to fell a number of trees. However, we have kept the number to an absolute minimum, whilst trying to protect as many of the best quality trees in the park as we can.

Turning to the point about historical flooding, it is correct to say that we are not aware of any flooding inside properties but there have been a number of what we term 'near misses' where water has risen to the height of the existing banks. Our approach to managing floods is not one where we react to flooding that has occurred, but to use the best available information and flood models to predict where flooding is likely to occur in the future and to put schemes in place (risk management approach) to prevent this. That is the approach that we have adopted here in Roath and it is consistent with approaches elsewhere in Wales. It is also in line with Welsh Government policy and approach.

We want to save the trees and ground in Roath Mill Gardens and Roath Brook Gardens in order to preserve the character of the area, minimise ecological damage and protect the habitats of our local wildlife.

As the leading environmental body in Wales we have great empathy with this statement. We have always recognised the need to preserve the special character of the area and have strived to incorporate within our design ways of minimising the impact on wildlife and nature. Although there is inevitably an impact, we believe that some of this will be short-term and whilst it is not possible to re-introduce trees that are decades old, our replanting scheme and maintenance thereafter will be done to give the best chance possible for the park and gardens to recover and flourish. Whilst we do not under-estimate people's current connection to the park and particular trees, and recognise there will be short-term disruption, it is our belief that the park will maintain its character, ecology and wildlife and will be sustained for future generations to enjoy.

We believe that Natural Resources Wales have not properly considered all options available, have misled the public with inaccurate figures during their consultation period and that it is, in fact unnecessary to bulldoze park grounds in order to widen the channel of the brook and remove mature trees in the process.

Through working with our own staff and external consultants we believe that we identified and considered all options before commencing this scheme. Of course, we recognise that others hold a different view. But at no time within our discussions have others been able to identify an alternative that is viable and that will not have greater impacts within the general area. At no time have we intentionally misled people. Some of our publications contained an error of data, *for a limited time*, but we want to re-emphasise that all information prior to October 2016 and within the planning application was correct.

To reiterate earlier statements, we believe that our scheme is proportionate, necessary, with minimal impact and will give the same level of flood protection within the community.

We call on the Welsh Government to urge National Resources Wales to stop work at Roath Mill and Roath Brook Gardens and consider the other viable options available to mitigate the perceived flood risk to this area.

As has been said earlier, we believe we have considered all viable options. In our professional opinion our scheme remains the best with the least impact. Through our discussions with the community no other options have been identified that can give the required level of protection to the people and properties at Roath Mill and Roath Brook Gardens.

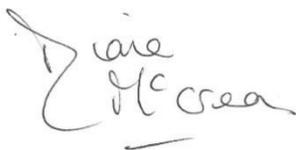
I hope the above addresses the points that have been raised in the petition. I would now like to turn to how we are attempting to engage with the community and its representative via the campaign group.

This matter is obviously current and so the position is one that changes. However, we would advise that the meetings held on 12 and 17 January 2018 with the campaign group have been, we believe, constructive and positive and enable us to better understand concerns. These meetings have also provided the opportunity for the campaign group to understand why we are undertaking the works. We remain hopeful that we will be able to agree a way forward with the campaign group, but recognise that there will be others who are likely to continue to object and protest against our flood scheme. We are holding further engagement events during the week commencing 22 January 2018.

Whilst it is important to recognise that everyone has a right to protest, it is equally important to highlight that we have been through the due process in developing the flood scheme, including public consultation, planning permission and final design.

In conclusion, we have always recognised that there will be a short-term impact as a result of our work on the parks and we have taken this into account in designing our scheme, developing the landscaping and re-planting proposals, as well as in our public consultation and elements of the scheme have evolved as a result of this consultation. We should like to stress that we are confident that our proposals will provide the flood protection required, the least impact on the environment, whilst maintaining the Edwardian heritage of the parks and gardens for future generations.

Yours sincerely,



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