



LOCAL FLOOD RISK MANAGEMENT STRATEGY

Consultation Report

July 2015

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1. Introduction

1.1 What is the Local Flood Risk Management Strategy?

Under the Flood Risk Regulations 2009 (“the Regulations”), Southwark Council was designated as a Lead Local Flood Authority (LLFA) with duties to identify areas at risk of flooding, prepare flood hazard / risk maps, flood risk management plans and co-operate with other risk management authorities in managing flood risk. Subsequently, the Flood and Water Management Act 2010 (“the Act”) came into effect in April 2011, requiring LLFAs to take on the responsibility of leading the co-ordination of flood risk management in their areas.

Under section 9 of the Act, Southwark Council is required to develop, maintain, apply and monitor a Local Flood Risk Management Strategy (LFRMS) for the borough. The LFRMS should provide strategic direction in proactively managing flood risk in Southwark to meet the requirements of the act.

The LFRMS outlines the general approach to managing flood risk across the borough consistent with the Act. The council’s primary purpose for this strategy is to ensure that, as far as is reasonably practicable, the risk of flooding to human health and life, the environment, economic activity, infrastructure and cultural heritage arising from surface water, groundwater and ordinary watercourses is minimised.

The key objectives of the strategy are to:

- Ensure a clear understanding of local flood risks, so that investment in risk management can be prioritised and implemented most effectively.
- Develop and maintain community and partnership based engagement in the management of flood risk and encouraging beneficiaries to invest in the management of risk where possible.
- Set out clear and consistent plans for risk management so that communities and businesses can make informed decisions about managing residual risks.
- Encourage innovative management of flood risk, taking account of the needs of communities and the environment
- Promote sustainable measures to reduce flood risk and provide multiple benefits to local communities.
- Develop links between the local flood risk management strategy and local spatial planning.
- Co-operate with neighbouring LLFAs to ensure effective risk management of flooding and compliance with the Water Framework Directive.
- Increase environmental protection and integrate considerations into the preparation and implementation of policies and programmes that promote sustainable development.
- Ensure that emergency plans and responses to flood incidents are effective and that communities are able to respond properly to flood warnings.
- Help communities to recover more quickly and effectively from flooding incidents.

The strategy will be reviewed every six years in line with the Preliminary Flood Risk Assessment (PFRA). There will be minor annual review of the action plans to take account of any changes that may have occurred in the course of each year.

1.2 What is the Strategic Environmental Assessment?

The Strategic Environmental Assessment (SEA) Regulations require that a statement is made available to accompany the plan, as soon as possible after the adoption of the plan or programme. The SEA Regulations recommend that the statement should contain the following:

- The reasons for choosing the strategy as adopted, in the light of other reasonable alternatives;
- How environmental considerations have been integrated into the strategy;
- How consultation responses have been taken into account; and
- Measures that are to be taken to monitor the significant environmental effects of the strategy.

1.3 What is this consultation report?

This document explains the consultation that has been undertaken so far as part of the preparation of the LFRMS and how these comments have been taken on board and influenced the final version.

Beyond the legal requirement to consult, views of partners, residents, groups and businesses were captured and incorporated where possible to ensure the LFRMS meets the needs of the community.

A consultation plan was prepared that set out the range of consultation intended. This report has been prepared to summarise the consultation that took place, the comments that have been received, the responses to these comments, and overall, the ways in which these comments have been incorporated in the final strategy document.

1.4 How to find your way around this document?

This consultation report comprises the following:

- Section 1: Introduction to the LFRMS and the consultation report.
- Section 2: The stages of consultation carried out so far and what happens next
- Section 3: The consultation carried out on the LFRMS and the SEA and a summary of comments received.
- Section 4: How and why the consultation process is monitored.
- Appendices

1.5 Where to get more information

The LFRMS and all supporting documents can be viewed at our website:

http://www.southwark.gov.uk/downloads/download/3986/draft_local_flood_risk_management_strategy

Copies are also available by contacting the Flood and Drainage Team at:

Email: floodriskmanagement@southwark.gov.uk or telephone 020 7525 2445

All the documents are also available to view in the local libraries and one stop shops (see **Appendix A** for location details).

2. Stages of consultation

2.1 What stages of consultation have been carried out so far?

Table 1. Details of Consultation Stages

STAGE OF CONSULTATION	WHEN DID IT OCCUR?
Consultation with internal partners on the draft Local Flood Risk Management Strategy, including further development based on the comments received.	November 2012 – March 2013
Consultation with external partners on the revised draft strategy including further development based on comments received.	May 2013 – April 2014
Consultation on the final draft Local Flood Risk Management Strategy and draft sustainability appraisal report.	November 2014 – February 2015
Consideration of the responses to the consultation on the Local Flood Risk Management Strategy and draft sustainability appraisal report.	February – April 2015
Preparation of the final strategy	April 2015
Adoption of the strategy	July 2015

2.2 What was consulted on?

Consultation on the draft LFRMS was undertaken for a period of 13 weeks from the 10th November 2014 to the 6th February 2015. This included consultation on the supporting SEA. The results of the consultation on this document are provided in the SEA Adoption Statement (**Appendix F**). The strategy sets out the proposed approach to managing flood risk throughout the borough. A list of all the consultees including statutory consultees that were consulted on the draft LFRMS is set out in **Appendix B**.

However, this was not the only consultation carried out as part of the preparation of the strategy. The consultation was undertaken in three stages:

- Consultation with internal partners
- Consultation with external partners, including the Environment Agency (EA), Thames Water and neighbouring London Boroughs.
- Consultation with the public.

Initial consultation was also undertaken on the SEA, for which the EA, English Heritage and Natural England were consulted. For further details of the responses received are included in the SEA Adoption Statement.

2.3 What happens next?

The draft strategy has been amended to incorporate the comments received; the final strategy will be submitted to the responsible cabinet member for adoption by 31st July 2015.

Once adopted, the strategy will be used as the basis for flood risk management across the borough; this document will be reviewed every six years and updated as required.

3. Consultation

3.1 Who was consulted and how?

The following sets out the consultation that has been carried out on the draft LFRMS.

A Consultation Plan was developed to document the consultation procedure and to ensure compliance with Southwark's Statement of Community Involvement (SCI) and the Act. The SCI sets out the approach to consultation on all planning documents, and identifies a number of barriers for consultation for different groups. Although the Local Flood Risk Management Strategy is not a planning document, the approach documented in the SCI was considered suitable for use. The SCI can be found on the Southwark website.

http://www.southwark.gov.uk/info/856/planning_policy/1238/statement_of_community_involvement_sci

The requirements for consultation set out in the Consultation Plan were met. The consultation period for the draft strategy was 13 weeks. Feedback that was received at any point in the consultation period was considered equally. The table below summarises the public consultation activity that was undertaken.

Table 2. Consultation Summary

Type of consultation	Activity	Groups involved	Date
External Consultation			
Approval to Consult	Approval of external consultation strategy to allow for initiation of consultation.	Cabinet member	September 2014
Documents on the web	All documents easily available electronically for people to read at their leisure	Everyone with internet access	10 November 2014
Documents available in libraries, one stop shops and council offices	All documents easily available in a range of locations throughout the borough	Available for all	10 November 2014
Public Consultation			
Camberwell Community Council	Inform the community about the Local Flood Risk Management Strategy, including providing details of where the strategy can be viewed.	Local residents and Councillors	19 November 2014
Peckham and Nunhead Community Council	Inform the community about the Local Flood Risk Management Strategy, including providing details of where the strategy can be viewed.	Local residents and Councillors	10 November 2014
Borough, Bankside and Walworth Community Council	Inform the community about the Local Flood Risk Management Strategy, including providing details of where the strategy can be viewed.	Local residents and Councillors	29 November 2014

Bermondsey and Rotherhithe Community Council	Inform the community about the Local Flood Risk Management Strategy, including providing details of where the strategy can be viewed.	Local residents and Councillors	3 December 2014
Dulwich Community Council	Inform the community about the Local Flood Risk Management Strategy, including providing details of where the strategy can be viewed.	Local residents and Councillors	3 December 2014
EA Consultation	Submission of the Strategy to allow for any further comments to be made.	EA	6 December 2014

3.2 How many comments were received?

3 questionnaire responses were received from individuals, generating 7 relevant individual comments on different aspects of the strategy. These comments have been considered as part of the preparation of the final version of the strategy. Given the technical nature of the subject, this level of response is not surprising. Other Local Authorities had comparative responses for their consultation.

A response was also received from the EA, in which they confirmed they had no further observations. This follows their earlier comments at the external partners' consultation stage which were incorporated in the draft final strategy document.

3.3 Questionnaire

A questionnaire was created that allowed respondents to state whether they believe that:

- The roles and responsibilities of the risk management authorities are clearly defined within the strategy.
- It is clear what the responsibilities of Southwark Council are.
- The objectives are clearly defined in the document.
- The document provides a suitable level of detail of the flood risk within Southwark.
- The strategy provides clear direction on how flood risk is to be managed.
- It is clear what actions will be taken by the council to manage local flood risk in the next few years.
- It is clear how the council will fund the actions.

A questionnaire was also created for the Strategic Environmental Assessment. Both questionnaires are included in Appendices C and D.

3.4 Summary of responses received

All comments received and the responses to these comments are set out in **Appendix E**. A summary of the main issues raised during this stage of the consultation and a brief explanation of how these comments have affected the content of the LFRMS is as follows;

Two of the responses highlighted that residents need to be reminded on a regular basis of their responsibilities on actions that need to be taken to mitigate flood risk. This could be in

the form of awareness programmes. This will be considered going forward during the implementation of the Local Flood Risk Management Strategy.

3.5 Specific events

No specific events were arranged for the consultation on the LFRMS, as they were not considered suitable in this case.

3.6 Strategic Environmental Assessment Consultation

Consultation on the SEA Environmental Report was undertaken from November 2014 to February 2015. The consultees included the following three statutory environmental bodies: Natural England, EA and English Heritage. The SEA Report was made available for their review alongside the Local Flood Risk Management Strategy. In addition, the LFRMS and SEA were placed on the Southwark Council website, together with consultation questionnaires, included as **Appendix D**.

Consultation responses were received from Natural England and English Heritage and the following tables set out the responses received and explain how the issues raised were or will be addressed. No response was received from the EA. One consultation questionnaire from Southwark's website was filled out and returned. For more details, refer to the SEA Adoption Statement.

4. Monitoring our consultation

4.1 Why we monitor our consultation?

In addition to compliance with legal requirements, it is important that the final Local Flood Risk Management Strategy meets the needs of those living, working and visiting Southwark. Our SCI indicates that the success of consultation can be measured by the numbers and diversity of consultees and respondees. By monitoring the responses received through consultation, it can be determined whether there are any obvious gaps or areas that we need to focus on to make sure the consultation reach all relevant parties.

4.2 How we monitor our consultation

During every consultation, Southwark Council look at the different people and groups that have commented on the planning document and look back over the events and consultation activities carried out to see whether more or different groups should have been targeted. This is fed into planning for any additional stages of consultation, with further consultation events set up as required.. The aim is to encourage people from all groups and areas to get involved in consultations. This includes people across all nine protected characteristic groups including different ethnic, age and religious groups. It also includes involving people from different organisations to include local residents, local voluntary and community sector groups, local businesses and traders, landowners, statutory consultees such as the EA and developers.

The team attended all community council meeting to raise awareness of the Local Flood Risk Management Strategy and how the community can provide comments.

Consultation on the Local Flood Risk Management Strategy was mostly received through comments on questionnaire responses. This resulted in a limited demographic feedback that does not provide a clear picture of whether a wide range of groups of people were engaged. However, based on the requirements of the Consultation Plan, coupled with the extensive consultation carried out prior to the public consultation, the team is confident that the Local Flood Risk Management Strategy is suitable for implementation and meets the needs of local residents, businesses and groups.

5. Recommendation

The final LFRMS is a document that is fully compliant with all legal requirements under the Act, and represents a sound, practical approach to the management of flood risk in Southwark. Based on the consultation undertaken with internal partners, external partners and with members of the general public, the Flood and Drainage Team is confident that the strategy, if adopted will fully meet its objectives.

It is therefore recommended that the LFRMS be adopted for use by the Council.

Appendix A

List of locations where documents made available

Libraries

Blue Anchor Library - Market Place, Southwark Park Road, SE16 3UQ

(Monday, Tuesday and Thursday 9am to 7pm, Friday 10am to 6pm, Saturday 9am to 5pm)

Brandon Library - Maddock Way, Cooks Road, SE17 3NH

(Monday 10am to 6pm, Tuesday and Thursday 10am to 7pm, Saturday 10am to 5pm)

Camberwell Library - 17-21 Camberwell Church Street, SE5 8TR

(Monday, Tuesday and Thursday 9am to 8pm, Friday 10am to 6pm, Saturday 9am to 5pm)

Canada Water Library – 21 Surrey Quays Road, SE16 7AR

(Monday to Friday 9am-8pm, Saturday 9-5pm, Sunday 12-4pm)

Dulwich Library - 368 Lordship Lane, SE22 8NB

(Monday, Wednesday, Thursday and Friday 9am to 8pm, Tuesday 10am to 8pm, Saturday 9am to 5pm Sun 12pm to 4pm)

East Street Library - 168-170 Old Kent Road, SE1 5TY

(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)

Grove Vale Library - 25-27 Grove Vale, SE22 8EQ

(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)

John Harvard Library - 211 Borough High Street, SE1 1JA

(Monday, Tuesday, Wednesday and Thursday, Friday 9am to 7pm, Saturday 9am to 5pm)

Kingswood Library - Seeley Drive, SE21 8QR

(Monday and Thursday 10am to 2pm, Tuesday and Friday 2pm to 4pm, Sat 1pm to 5pm)

Nunhead Library - Gordon Road, SE15 3RW

(Monday, Tuesday and Thursday 10am to 7pm, Friday 10am to 6pm, Saturday 10am to 5pm)

Peckham Library - 122 Peckham Hill Street, SE15 5JR

(Monday, Tuesday, Thursday and Friday 9am to 8pm, Wednesday 10am to 8pm, Saturday 10am to 5pm, Sunday 12pm to 4pm)

Area Housing Offices

Camberwell - Harris Street, London, SE5 7RX

Rotherhithe - 153-159 Abbeyfield Road, Rotherhithe, SE16 2LS

(All open Monday – Friday, 9am-5pm)

Peckham -122 Peckham Hill Street, London SE15 5JR

(Also open Saturday 9am to 1pm)

One Stop Shops

Peckham - 122 Peckham Hill Street, London, SE15 5JR

(Open Monday-Friday 9am-5pm, Saturday 9am to 1pm)

Appendix B

List of consultees including statutory consultees

*Please note this list is not exhaustive and also relates to successor bodies where re-organisations occur.

Statutory

- Regional Flood and Coastal Committee
- Environmental Agency
- Thames Water
- Greater London Authority
- London Councils
- Transport for London
- English Heritage (London Region)
- London Development Agency
- Natural England
- Mayor of London
- The Highway Authority

Neighbouring Councils

- Bromley Council
- Lambeth Council
- Lewisham Council

Non-statutory Consultees

- Southwark Local Community Councils
- Tenants and Residents Associations
- Local Businesses
- Friends of Local Parks Groups
- Herne Hill Forum
- General Public

Appendix C

Local Flood Risk Management Strategy Questionnaire



Consultation Questionnaire

Local Flood Risk Management Strategy

November 2014

Please answer the following questions concerning the Local Flood Risk Strategy (LFRS).

1. Are the roles and responsibilities of the risk management authorities clearly defined in the strategy?
2. Is it clear what the responsibilities of the council are? YES/NO

If not please indicate what you think is missing?

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3. Are the objectives of the strategy clearly defined in the document? YES/NO
4. Does the strategy give you a good idea of the extent of flood risk in Southwark? YES/NO
5. Does the strategy provide a clear direction on how the council intends to manage local flood risk? YES/NO
6. Is it clear what actions will be taken by the council to manage local flood risk in the next few years? YES/NO
7. What other actions could the council take to address flood risk in the borough?

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8. Is it clear how the council will fund the actions? YES/NO

Prioritisation

As a result of limited funding the council has to prioritise measures to manage flood risk.

9. Please grade Actions 1 to 7 in your preferred order of priority (1 is the least priority and 7 is the highest in priority).
 - a. Investigating predicted flood risk areas
 - b. Investigating existing small-scale flooding problems
 - c. Enhanced maintenance and improvement of the drainage network
 - d. Encourage private landowners and householders to be responsible for preventing flooding to their property?
 - e. Encourage individuals to take small steps such as depaving to help reduce flood risk
 - f. Encourage new developments to incorporate measures to reduce flood risk in surrounding areas.
 - g. Council to work in partnership with new developers for solutions to affordable drainage.

Please provide any additional comments:

About This Consultation

The council would like to hear your views on the draft local flood risk strategy.

Period of Consultation

Please ensure the council receives your views by 5pm on Friday, 6th February 2015.

Post or email your responses for the attention of:

John Kissi
Flood Risk Manager
Flood and Drainage Team
London Borough of Southwark
FREEPOST SE1919/14
London SE1P 5LX

Email: FloodRiskManagement@southwark.gov.uk

If you require further information about this consultation please telephone
020 7525 2062

Appendix D

Strategic Environmental Assessment Questionnaire



Consultation Questionnaire

Strategic Environmental Assessment

November 2014

Please answer the following questions concerning the Local Flood Risk Strategy (LFRS).

1. Have all relevant plans, programmes and policies been considered? YES/NO

If not please indicate what you think is missing?

2. Are you content that Section 4.3 and Appendix 2 set out an accurate description of the current environmental baseline? YES/NO

If not please explain why.

3. Are you aware of any further environmental information that will help to inform the assessment findings? YES/NO

If so, please provide details.

4. Do the SEA objectives reflect the right aspirations for development of more sustainable approaches to surface water management? YES/NO
5. Are you aware of other 'reasonable alternatives' for the management of flood risk within Southwark that should be considered as part of the SEA process? YES/NO

If so, please provide details.

6. Do you agree with the predicted environmental effects of the LFRMS measures set out in Section 6 of the Environmental Report? YES/NO

If not, please explain why.

7. How should the LFRMS balance objectives to protect and enhance the natural environment with the need to manage flood risk to the human environment?

8. What are your thoughts on proposals for monitoring the environmental effects of the LFRMS?

9. Do you have any comments on the proposed structure of the Environmental Report?

10. Do you have any further comments on the proposed approach and scope of the SEA?

About This Consultation

The council would like to hear your views on the draft Strategic Environmental Assessment

Period of Consultation

Please ensure the council receives your views by 5pm on Friday, 6th February 2015.

Post or email your responses for the attention of:

John Kissi
Flood Risk Manager
Flood and Drainage Team
London Borough of Southwark
FREEPOST SE1919/14
London SE1P 5LX

Email: FloodRiskManagement@southwark.gov.uk

If you require further information about this consultation please telephone
020 7525 2062

Appendix E

Responses received on the draft Strategy

Ref	Source	Details of Comment	Officer Response to Comment
1	Questionnaire (received by mail)	The language of the report needs to be changed to make it simpler to read.	A non-technical summary was provided with the LFRMS; the English used in the summary was simpler than for the strategy itself. Therefore, no action is required.
2	Questionnaire (received by mail)	I found the strategy by accident. It should be spread around all of the Tenants and Residents Associations (TRAs).	As a result of receiving this comment, the Strategy was sent to all TRAs.
3	Questionnaire (received by mail)	Awareness programmes should be used in the management of flood risk within Southwark.	Awareness programmes were undertaken as presentations were made to all community councils. More of that will be done going forward in the implementation of the strategy. This will be developed further once the strategy has been adopted.
4	Questionnaire (received by mail)	Workshops, seminars, leaflet displays etc. should be used to provide information on the strategy and effects on the natural environment.	Workshops, seminars and other such communication measures will be considered during the implementation of the strategy. This will be developed further once the strategy has been adopted.
5	Questionnaire (received via website)	We have been closely involved with the Dulwich and Herne Hill Flood Alleviation project. We would like in due course i) evidence of effectiveness of measures implemented and ii) whether the EA surface flood maps have been amended in terms of the surface flood risk in our area.	Construction of the Herne Hill flood alleviation scheme has recently been completed. The effects of the scheme will be monitored over a set period, in order to measure its overall effectiveness. Discussions will be held with the EA regarding the surface water flood maps, and any modelling work required. No changes will be made to the strategy based on this comment.
6	Questionnaire (received via website)	We also like the idea of the depaving and greening projects but would need to see leadership and support from the Council in such projects, and direct offers to residents.	Projects involving sustainable drainage systems, which may involve depaving and greening will be rolled out in line with the guidelines set out in the Local Flood Risk Management Strategy. The action plans detail potential options for each community council area. These will be investigated further and developed once the strategy has been adopted.

Ref	Source	Details of Comment	Officer Response to Comment
7		Residents need a reminder (on a regular basis) of the actions they need to take with regards to flood risk including telephone numbers to contact in an emergency and actions to take to mitigate risk.	In line with the strategy, community flood plans will be developed for high risk areas to help communities determine practical actions to take before, during and after flooding. The strategy also highlights measures to reduce damage from flooding, such as, improved weather warnings, education and awareness. Methods for communicating effectively to residents will be developed once the strategy has been adopted.

Appendix F
Strategic Environmental Assessment Adoption Statement