

Meeting Name:	Cabinet
Date:	16 September 2024
Report title:	Local Flood Risk Management Strategy
Cabinet Member:	Councillor James McAsh, Clean Air, Streets and Waste
Ward(s) or groups affected:	All
Classification:	Open
Reason for lateness (if applicable):	N/a

FOREWORD - COUNCILLOR JAMES McASH, CABINET MEMBER FOR CLEAR AIR, STREETS AND WASTE

Over 2,000 properties are at a high risk of flooding from surface water within the Southwark borough. With the effects of climate change this number is likely to rise in coming years. It is vital that we invest and support the development of flood risk management within the Southwark borough to better protect people, property and the natural environment.

Collaboration between departments in Southwark Council, led by the Flood Risk Management Team, has meant that sustainable and innovative flood alleviation projects have been successfully delivered.

The Dulwich and Herne Hill areas experienced widespread flooding in 1984, 2004, and 2007. In 2015 a flood alleviation scheme was completed that provided £12m of economic benefit to the area, whilst protecting over 200 properties at risk of surface water flooding and 80 properties at risk of sewer flooding.

This Local Flood Risk Management Strategy sets out four strategic objectives which Southwark Council will follow to deliver improved flood risk management duties over the next six years. These are underpinned by core themes of flood risk awareness, collaboration and communication, socio-economic and environmental benefits, and climate change.

Our recently updated Surface Water Management Plan has refreshed our understanding of flood risk within the Southwark borough. This information has subsequently informed decisions taken for this Local Flood Risk Management Strategy, from which a detailed action plan has been produced which establishes 41 actions for delivery by Southwark Council and other risk management authorities to improve Southwark's flood resilience.

The Southwark Flood Risk Management Team will lead on the delivery of most actions however it is crucial that risk management authorities collaborate effectively to support the overall delivery of flood risk management.

Flood risk cannot be avoided completely but actions taken by individuals, businesses, community groups, and organisations can help to reduce damage and improve recovery.

We would like to thank colleagues across Southwark Council for contributing to the development of this Local Flood Risk Management Strategy. We would also like to thank the Environment Agency and Thames Water for their support in taking ownership of some actions within the Southwark borough.

Alongside this we would like to thank all those who have taken the time to respond to our public consultation and provided us with valued feedback which will be considered through the development and delivery of this Local Flood Risk Management Strategy.

RECOMMENDATIONS

Recommendations for the Cabinet

1. That the approval and implementation of the updated Local Flood Risk Management Strategy (LFRMS) as set out in Appendix 1 be agreed.

Recommendations for the Leader of the Council

2. That the leader of the Council approves the implementation of the strategy as per the Council's statutory duties as a Lead Local Flood Authority (LLFA) role.

REASONS FOR RECOMMENDATIONS

3. An updated LFRMS is a statutory duty of the authority. As a LLFA, Southwark Council has a duty to develop a strategy for local flood risk management. There is also a requirement to maintain, apply and monitor it, as set out under Section 9 of the Flood and Water Management Act (2010).

ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

4. N/a

POST DECISION IMPLEMENTATION

5. Once approval has been received to adopt the LFRMS, the document will be published on the council's website, and a communications campaign will be organised to notify the community. Sessions can also be held between LLFA officers and councillors to improve awareness of the LFRMS and how it can be used.
6. To support the delivery of the LFRMS, an Action Plan has been developed, which details how the goals of the LFRMS will be achieved. These actions each have timescales for delivery, and these will be monitored to evaluate the delivery of the LFRMS.

Key Activity	Target completion date
Local Flood Risk Management Strategy to be published	2024
Implementation of Action Plan	2024 - 2030

BACKGROUND INFORMATION

7. The Regulations designate all local authorities including Southwark Council as Lead Local Flood Authorities. Among others, a Lead Local Flood Authority (“LLFA”) has 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. The Act came into effect in April 2011, requiring LLFAs to take on the responsibility of leading on the management and co-ordination of local flood risk.
8. The Council has taken notice of the new roles and responsibilities under the act and is one of very few Boroughs in London to have put in place a dedicated flood and drainage team. The team has been in place since April 2011.
9. Under section 9 of the Act, Southwark Council is required to develop, maintain, apply, and monitor a LFRMS for the borough. The LFRMS should provide strategic direction in proactively managing flood risk in Southwark to meet the requirements of the act.
10. 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.
11. The key objectives of the strategy are to:
 - To improve community awareness of local flood risks and the authorities responsible for managing them.
 - To collaborate with internal departments, organisations, authorities and partnership groups to support successful communication in managing flood risk.
 - To support development across Southwark encouraging the integration of Sustainable Drainage Systems (SuDS) within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.
 - To apply knowledge on local flood risk to assist in improving Southwark’s resilience to the impacts of climate change.
12. The LFRMS can be found in (Appendix 1), along with this a Strategic

Environmental Assessment (SEA) (Appendix 2), Habitat Regulations Assessment (HRA) (Appendix 3), Action Plan (Appendix 4), have also been developed.

KEY ISSUES FOR CONSIDERATION

13. Development of the first draft of the LFRMS was completed in 2023. The documents were then distributed internally for consultation among relevant Council teams. Comments received from the internal consultation were incorporated into an updated version of the documents.
14. The revised strategy was then sent to external partners for the second stage of consultation. This was to ensure that the document fully complied with all requirements of the Act, and to draw on the experience and knowledge of the external partners. The external partners consulted included the Environment Agency, Thames Water, neighbouring London Boroughs and Transport for London. The comments received were used to further refine the strategy.
15. The draft strategy was subsequently sent out for public consultation in June 2023. This was to ensure that the needs of the community were fully understood and met.
16. The consultation process involved attendance and presentations at Community Council meetings. The draft strategy, the associated SEA and questionnaires were loaded on the Council's website for the public to review and comment. In addition, the aforementioned documents were placed in all local libraries, one stop shops and housing offices to make them readily accessible to the public.
17. The public consultation received a good level of engagement, with over 100 responses from members of the public. This ensured that the final version of the LFRMS was as reflective of the views of local residents as possible, to ensure a Strategy that can be implemented to the benefit of communities across Southwark.
18. Notice has been taken of relevant comments and responses were reviewed and suitably incorporated into an updated version of the LFRMS. Key among them was the need to make the document available to tenants and resident associations and to simplify the language in the strategy. A simplified version of the strategy was already available, and tenants and residents' associations were notified of the consultation.
19. The consultation was undertaken in adherence with the Council's Statement of Community Involvement adopted on the 29 January 2008 which specifies a 12-week public consultation (6 weeks formal and 6 weeks informal) period for Local Development Documents.
20. Table 1 below summarises the stages of the consultation process.

Table 1. Consultation Stages

Stage of Consultation	When did it occur?
Internal consultation	Early 2023
External consultation with relevant stakeholders	February 2023
Public consultation	June - August 2023

21. Following the public consultation, the responses received were reviewed and suitably incorporated into an updated version of the LFRMS. An overview of the main comments received, that were addressed by updates, has been included below:

- **Stronger policies / bolder actions on depaving, non-permeable paving and improving green space** – Information included to support, encourage, and advise residents on de-paving and the installation of green roofs. The document puts forth measures to regulate the effective use of these strategies by private landowners and sets a firm plan for extending the few small pilot projects which have been put in place so far. Green roofs and de-paving are key components of Southwark's strategy.
- **Improved references to policy context** – Wider policy drivers noted, including the Urban Greening factor and Biodiversity Net Gain, highlighting these as important measures which will manage surface water and increase attenuation. The LFRMS should also reference Southwark Local Plan policies on drainage.
- **Increase the frequency of community events with residents** – No changes made to LFRMS. However, Southwark Flood Risk team have formed a partnership with the National Flood Forum to setup a community flood group in Gipsy Hill and have attended / are attending multiple community events to increase awareness of flooding and suitable mitigation.

Policy framework implications

22. The Council's roles and responsibilities under the Act and Regulations, which are documented in the LFRMS, have implications, particularly on the Council's development of planning policy.

23. The LFRMS also highlights the increasing importance for new developments to demonstrate an allowance for climate change and its impacts in proposals, such as changes in rainfall patterns.

Community, equalities (including socio-economic) and health impact statement.

24. Recommendations set out in this report will have no particular impact on people with protected characteristics, namely age, disability, faith/religion, gender, race and ethnicity and sexual orientation.

25. The LFRMS has identified areas at a higher risk of flooding and recommends engagement with such communities to raise awareness and actions to reduce flood risk.

Climate change implications

26. The LFRMS aligns with priority 3 of the Council's Climate Change Strategy. The plan is underpinned by the core theme of climate change and the effects this will have on properties at risk of flooding in the future.
27. Southwark Council's aim of becoming carbon neutral by 2030 is also something which the LLFA supports and looks to maximise opportunities within the delivery of flood alleviation schemes. Actions addressing climate change issues have been included under LFRMS Strategic Objective D and broadly aim to:
- To reduce carbon emissions, with the aim of being carbon neutral.
 - To improve biodiversity by contributing to net environmental / biodiversity gain.
28. The LLFA will collaborate with the Southwark Climate Change team to support the delivery of the Climate Change Action Plan, where these actions relate to flood risk.
29. Climate change is set to increase the risk of tidal flooding Southwark is vulnerable to from the River Thames. At present this is managed by the Thames Tidal Defence System which in its entirety includes:
- The Thames Barrier and eight other flood barriers
 - Over 330km of walls and embankments
 - Over 400 other structures such as flood gates, outfalls and pumps.
30. However, these assets need to be regularly maintained and where this cannot be met there is a reduced standard of protection offered by the Tidal Thames Defence System due to asset deterioration and the impact of climate change.
31. To manage this the Thames Estuary 2100 (TE2100) Plan sets out an adaptive plan for different rates of sea level rise and monitors how the estuary is changing. Regular reviews of the plan enable an effective approach to maintaining and improving defences along the Thames Estuary against the effects of climate change. The TE2100 Plan was developed by the EA and provides strategic direction for managing flood risk in the Thames Estuary to the end of the century.
32. Southwark Council will continue to work with our partners in managing the flood risk from the River Thames to bolster resilience to flooding both now and in the face of climate change.

Resource implications

33. The LFRMS will have no additional resource implications for Southwark Council. A team has been in place to execute the Council's duties and

responsibilities under the Flood Risk Management Act 2010. This team will assume responsibility for implementing the LFRMS. The team is currently funded from the Council's allocation of a Government Grant.

Consultation

34. Extensive consultation was carried out in three stages:
 - Consultation with internal partners
 - Consultation with external partners (e.g. Environment Agency, Thames Water, neighbouring London Boroughs)
 - Public consultation.
35. The process ensured that the views of internal and external stakeholders were taken into consideration in the final strategy.
36. All available avenues were employed to ensure stakeholders were made aware of the document. These included the website, libraries, housing offices and one stop shops. Council social media channels were used to publicise the public consultation, to ensure that residents were fully aware of the consultation taking place.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive (Governance & Assurance) – NST280824

37. The Flood Risk Regulations 2009 and Flood and Water Management Act 2010 impose a wide range of duties on Lead Local Flood Authorities. Primarily these duties relate to the need to analyse and plot the risk from flooding in their area and to prepare a flood management plan, which may identify areas where flood mitigation work is advisable. The requirement is to coordinate views and activity with other local bodies and communities through public consultation and scrutiny, and delivery planning.
38. Section 9 of the Act requires the Council as the lead local flood authority to maintain, apply and monitor a strategy for flood risk management in its area ("LFRMS"). Under section 7 of the Act, the LFRMS must be consistent with the national flood and coastal erosion risk management strategy. Prior to adopting the LFRMS, the Council is required to consult with the public and in turn publish a summary of its LFRMS.
39. The consultation responses are summarised in paragraph 21 of the report.
40. Section 149 of the Equality Act 2010 imposes the public sector equality duty (PSED) on public authorities in the exercise of their functions, the council, in the exercise of its functions, to have due regard to the need to:
 - eliminate discrimination, harassment and victimisation.
 - advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it;

- foster good relations between persons who share a relevant protected characteristic and those who do not share it.
41. Community, equalities (including socio-economic) and health impact are considered in paragraphs 24-25.
 42. Council Assembly on 14 July 2021 approved a change to the council's Constitution to confirm that all decisions made by the council will consider the climate and equality (including socio-economic disadvantage and health inequality) consequences of taking that decision. This is considered at paragraphs 26-32.
 43. Under paragraph 3B, under paragraph 5 of the policy heading, Cabinet has the power to determine the authority's strategy and programme in relation to the social, environmental and economic needs of the area. Given the cross-cutting nature of the LFRMS at Appendix 1, Cabinet is asked to agree the strategy.

Planning

44. The Head of Development Management has confirmed that there are no comments from the Planning team, and that they approve of the content included within the LFRMS.

Strategic Director of Resources (FC24/010)

45. This report requests that the Cabinet and the leader of the Council approve the updated Local Flood Risk Management Strategy outlined above.
46. The Strategic Director of Resources notes that there are no additional funding implications arising from the implementation of the updated Local Flood Risk Management Strategy.
47. The funding of the strategy will be contained within the £452k Flood Risk base budget within the Highways Division.
48. The Strategic Director of Resources notes that staffing and any other running costs connected with these recommendations are to be contained within existing resources.

APPENDICES

No.	Title
Appendix 1	Local Flood Risk Management Strategy and Associated Documents
Appendix 2	Strategic Environmental Assessment (SEA)
Appendix 3	Habitat Regulations Assessment (HRA)
Appendix 4	Action Plan

AUDIT TRAIL

Cabinet Member	Councillor James McAsh, Clear Air, Streets and Waste	
Lead Officer	Toni Ange, Acting Strategic Director of Environment, Sustainability and Leisure	
Report Author	Alwyn Samuel, Highways Maintenance Manager	
Version	Final	
Dated	4 September 2024	
Key Decision?	Yes	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Assistant Chief Executive, Governance and Assurance	Yes	Yes
Strategic Director, Resources	Yes	Yes
Cabinet Member	Yes	Yes
Date final report sent to Constitutional Team		4 September 2024