
Wokingham Borough Council Local Flood Risk Management Strategy

Summary of Autumn 2014 Public Consultation Responses and Changes to the LFRMS

1. Introduction

- 1.1.1. Consultation is an important part of developing a robust and effective Local Flood Risk Management Strategy (LFRMS), which deals with the most important issues in Wokingham and works to encourage stakeholders to take shared responsibility for managing and responding to local flood risk.
- 1.1.2. The Wokingham Borough Council LFRMS was published in draft for public consultation from the 1 September until the 31 October 2014. This consultation provided individuals, communities, businesses and other organisations with the opportunity to influence the LFRMS.
- 1.1.3. The consultation documents were available to read and download on Wokingham Borough Council's website and comments were submitted via an online questionnaire, emailed and sent via post to the Council.
- 1.1.4. The consultation sought views on:
- The objectives of the LFRMS;
 - The structure and content of the LFRMS;
 - The clarity of information in the LFRMS;
 - How the LFRMS has assessed flood risk and the consequences of flooding;
 - What people regard as the priorities; and
 - The actions that Wokingham Borough Council plans to take, along with its partners and communities, to better manage local flooding in the future.
- 1.1.5. The following methodology has been applied in response to comments raised as part of the public consultation:
- Comments which are relevant to the LFRMS and valid (well evidenced, echoed by other comments, or substantiated through the Borough Council's research) have resulted in an amendment to the LFRMS.
 - Comments which are incorrect (contradicted by a majority or shown to be inaccurate following research by the Borough Council) have not resulted in alterations to the LFRMS.
 - Comments which are outside of the scope of the LFRMS (such as those related to coastal or Main River flooding) have been noted separately, and, where possible, the issue passed on to the appropriate organisation.
- 1.1.6. A summary of the comments received and the resulting changes made to the LFRMS are provided in this report.

2. Summary of Responses and Proposed Changes

2.1. The LFRMS Objectives

2.1.1. A third of all the comments received called for amendments to the LFRMS objectives and / or for the inclusion of additional objectives.

2.1.2. A number of comments were received on the current objectives:

- Objective 1 and 2 should ensure that Wokingham Borough Council actively work with residents to collect information on historic and current flood risk and consult the community during the planning process.

WBC: A number of the measures that will ensure the achievement of these objectives encourage working with residents to improve understanding of flooding. These include:

- Utilise social media to enable the general public to report flood issues to improve knowledge of flood risk in the Borough;
 - Continue to work with local communities to develop Flood Forums/ Partnerships in at risk areas in the Borough; and
 - The findings and actions emerging from the SWMP will be promoted to local communities to involve them in the process of identifying solutions and implementing the actions.
- Objective 3 should be strengthened to ensure new development does not pose a threat in terms of increasing flood risk.

WBC: The wording of Objective 3 of the **LFRMS has been amended** to remove uncertainty in this objective. The revised wording for Objective 3 is as follows:

Ensure that planning and decisions take full account of flood risk, avoiding development in inappropriate locations, preventing an increase in flood risk and minimising existing flood risk wherever possible.

- With regards to Objective 4 the importance of historical assets should be remembered, especially as flood defences have the potential to be harmful to the significance of heritage assets.

WBC: The Strategic Environmental Assessment for the LFRMS addresses the concerns regarding historical assets.

- Objective 4 appears to recognise only structures as critical assets in drainage systems, whereas a great many features impact on capacity and may need maintenance and/or improvement both now and in the future.

WBC: The wording of Objective 4 of the **LFRMS has been amended** to ensure it recognises all flood risk management features, not just structures:

Maintain and, where necessary, improve local flood risk management infrastructure and work with riparian owners to ensure privately owned flood defence assets, features and Ordinary watercourses are well maintained, to reduce risk.

- All six objectives should state what will happen as a result of the objective and when this will occur.

WBC: Section 6 sets out the various measures that will be implemented in order to achieve each of the objectives. The Action Plan set out in Section 8 establishes the timescale in which each of the objectives will be achieved. This document provides a strategic overview of the approach to flood risk management in the Borough. Further research and investigation is required on some of the measures and actions before specific resources and finances can be detailed.

2.1.3. Suggestions for additional objectives included:

- More comprehensive information on flooding to be used for planning application reviews.

WBC: Objective 3 will ensure the flood risk and drainage information submitted with planning applications is comprehensively reviewed in line with current and appropriate guidance.

- Provision of better information for property owners on how to better manage flood risk at their property in order to protect areas downstream.

WBC: The following measures, that will be delivered in order to achieve Objectives 4 and 5 respectively, address the above comment:

Produce a guidance/advice note for riparian owners to ensure they are aware of their responsibilities to maintain their watercourses and associated assets.

Work with local communities at risk from flooding to develop Flood Forums and work with these Forums to develop Flood Plans and encourage Flood Wardens.

- Place greater emphasis on undertaking large scale flood alleviation works.

WBC: An emphasis on undertaking 'Large scale flood alleviation works' would not be consistent with national policy. All flood alleviation works seeking National Government funding are required to demonstrate they maximise the benefit available. National Government funding for flood alleviation works is allocated on a prioritisation basis, which reflects the economic benefits that can be provided by a scheme over its lifetime. Given the rural nature of Wokingham Borough and the scale of the watercourses for which Wokingham Borough Council is responsible the scale of flooding is relatively minor compared to other locations nationally, whilst costs to implement large scale works would be substantial. This would effectively rule out any significant contribution from National Government towards the costs of large scale flood alleviation works. Therefore Wokingham Borough Council is committed to seeking opportunities to deliver economically viable flood alleviation works to maximise the potential to deliver alleviation to the maximum number of individuals and businesses possible.

- Recognise the social, economic and environmental cost of flooding to physical infrastructure, which would include the historic environment. This objective should also recognise that flood prevention and mitigation measures can themselves have adverse consequences which should be avoided / mitigated. The following objective was suggested:

Avoid or, where that is not possible, mitigate the social, economic and environmental impacts of both flooding and flood prevention and mitigation measures

WBC: It was felt it would be more beneficial to provide information on the impact flooding can have in terms of social, economic and environmental costs, including the historic environment, rather than including an additional objective. The **LFRMS has been amended** to provide this additional information.

2.2. Legislative and Policy Context

2.2.1. The majority of responses agreed this section was sufficiently comprehensive and provided adequate detail.

- It was requested that a section be included on the relevant River Basin Management Plan (RBMP) and how the LFRMS will contribute to achieving the objectives and measures of this document and the relevant Catchment Flood Management Plan (CFMP) in line with the Water Framework Directive (WFD) and the catchment based approach.

WBC: This comment is covered by the Water Framework Directive assessment for the LFRMS.

2.2.2. This section of the **LFRMS has not been amended**.

2.3. Roles and Responsibilities

2.3.1. The majority of responses to the public consultation stated that the roles and responsibilities of the various flood risk management authorities were adequately and clearly covered by the LFRMS; however a number of comments were received:

- With respect to the Environment Agency's role, it was felt by one member of the public that it is not clearly set out in the LFRMS as to how the Environment Agency's responsibilities are integrated into the flood risk management approach.

WBC: The national and local responsibilities of the Environment Agency with regards to flood risk management are detailed in the LFRMS. The **LFRMS has been amended** to include a link to the Environment Agency's website, where additional information on their role and responsibilities can be found.

- It was also questioned as to whether Wokingham Borough Council has an influence on developments for which it is not the planning authority.

WBC: Wokingham Borough Council is consulted on all planning applications that will affect an area of the Borough under planning legislation; it was not felt necessary to replicate this information in this document.

- It was noted that Figure 2 and section 4.3 of the LFRMS should be amended to detail that a representative from the RFCC and not the RFCC chair attends the Strategic Group meetings. It was also noted that an EA Area Officer attends the Technical Group Meeting, which should also be amended within Figure 2.

WBC: The **LFRMS has been amended** to reflect the above comment.

- One resident noted that attention should be drawn to the fact that the Parish Councils are a useful conduit for information, in both directions. Often, Parish Clerks know more quickly and more accurately about flooding events. They also have email and other networks which provide very effective means of collecting and disseminating information.

WBC: The value of Parish Councils and Parish Clerks is recognised and a number of the measures propose to work with these groups and individuals to better flood risk understanding, alleviation, preparation and response.

- Concern was raised that this section is too complicated and covers too many authorities with a similar remit. It was suggested an organogram be used to demonstrate the various bodies with a responsibility for flood risk management.

WBC: The Roles and Responsibilities section is not only for members of the public, but to ensure all Risk Management Authorities in Wokingham have a clear understanding of what is expected of them. It is therefore, not appropriate to simplify this section or remove any of the authorities listed. It is considered that an organogram would not make things clearer as the roles of the risk management authorities are not formally linked and there is no hierarchy in which these organisations sit.

2.4. Understanding and Managing the Flood Risk in Wokingham

2.4.1. The following comments were received on Section 5 of the LFRMS:

- It was requested that further information be included within section D.5.3 relating to any schemes/projects which have already been undertaken and are being investigated in the borough (i.e. the WBC Road Resilience Strategy) to manage local flood risk.

WBC: The sensitive nature of some of the information on flood risk alleviation schemes means this information could not be replicated in this LFRMS in a consistent manner.

- It was also suggested that Section D.3 is updated to include the locations/details/mechanisms where available of the historic flooding experienced in the borough to help identify areas at high flood risk in the borough to enable resources to be targeted appropriately.

WBC: Information on historic flooding is held by the Borough and published in the Strategic Flood Risk Assessment (SFRA). The **LFRMS has been amended** to include an additional short-term measure to update the SFRA.

- A number of comments call for historical flood information to be more widely used to determine planning decisions.

WBC: Objective 3 will ensure the flood risk and drainage information submitted with planning applications is comprehensively reviewed in line with current and appropriate guidance.

- It was requested that further information be included to inform residents and businesses on how they can improve their resilience to flooding.

WBC: One of the measures to deliver Objective 5 of the LFRMS objectives is to continue to:

Work with local communities to develop Flood Forums/ Partnerships in at risk areas in the Borough, which will help improve their understanding of the options available to improve resilience to flooding and reduce flood risk.

2.4.2. This section of the **LFRMS has not been amended**.

2.5. Additional Measures

2.5.1. A number of additional measures were suggested in the consultation responses:

- Another measure is required to maximise the opportunity to seek funding: researching other avenues for generating income for flood risk management. In particular, what other schemes and projects are planned for the borough that could have a flood risk management dimension.

WBC: Schemes and projects are being developed continuously and providing a list in this document would soon become outdated. Wokingham Borough Council Officers continually liaise with each other, developers and other Risk Management Authorities to maximise the opportunities to deliver flood risk reduction benefits to the community.

- The expertise of communities and local knowledge should be given greater weight when reviewing planning applications and identifying areas at risk of flooding.

WBC: Local knowledge and expertise is collected as part of the Section 19 Flood Investigations for areas at risk and are used to form the evidence base for establishing areas at risk in the borough and areas where flood alleviation schemes are required. This information is also used in the review of planning applications. Objective 3 will ensure the flood risk and drainage information submitted with planning applications is comprehensively reviewed in line with current and appropriate guidance.

- The general public do not necessarily know who the responsible risk management authority is during an emergency; better coordination needs to be achieved between the various risk management authorities to ensure any issues are dealt with, regardless of whether the wrong risk management authority was notified.

WBC: Wokingham Borough Council will work with communities at risk of flooding to form Flood Forums to help educate people and ensure they understand who to contact during times of flood. Wokingham Borough Council will also work with at risk communities during a flood event, to liaise with Flood Forums and Wardens, to ensure they are aware of any issues exacerbating the flooding.

- An action plan is required, listing the known risk areas in order of priority, with a timescale for remedial action commensurate with the available budget.

WBC: A priority tool is one of the actions proposed to deliver the objectives of the LFRMS. This tool will identify areas and communities at high risk and help prioritise measures and flood alleviation schemes.

- Specific flood alleviation schemes should be proposed.

WBC: Schemes and projects are being developed continuously. Any list provided in this document would soon become outdated.

- Include a section on how the WFD objectives and measures will be incorporated to ensure that wider environmental benefits will be achieved to create multiple benefits.

WBC: The Water Framework Directive assessment for the LFRMS sets out how WFD objectives will be considered in flood risk management works and schemes in the Borough.

- The measures relating to Objective 2 should be amended to ensure that wider environmental benefits will be achieved through the LFRMS and details provided on how these measures will be achieved.

WBC: The SEA and HRA for the LFRMS address the above concerns.

- Where are the clearly defined actions, actual resources applied, defined finances, measurable outcomes states, etc.? Without these, this LFRMS will not change the way Wokingham Borough Council manage flood risk and people will remain at risk.

WBC: This document provides a strategic overview of the approach to flood risk management in the Borough. Further research and investigation is required on some of the measures and actions before specific resources and finances can be detailed.

- Since setting a SuDS policy is failing at the national level, WBC must continue to develop a local policy for the Borough.

WBC: One of the measures under Objective 3 is to:

Develop a guidance document for SuDS, setting out the local standards that will be required for SuDS in Wokingham in addition to the National Standards.

- Wokingham Borough Council should continue to improve its maintenance of road drains, gullies and adjacent culverts.

WBC: Wokingham Borough Council have a duty to maintain roads and associated drainage features as part of their role as the Highways Authority. The various tasks associated with this duty do not need to be duplicated as measures in the LFRMS.

- Advising landowners of their responsibilities should be a high priority measure.

WBC: One of the existing short-term measures is to:

Produce a guidance/advice note for riparian owners to ensure they are aware of their responsibilities to maintain their watercourses and associated assets.

- All outstanding planning consents in or impinging on Flood Zones 2 and 3 should be reversed.

WBC: The cost and time associated with reversing all outstanding planning consents makes this measure unviable. In addition, Wokingham Borough Council policy does not prevent development in Flood Zone 2 or 3 and thus, there is no supporting documentation to back up such a revision to these decisions.

- Identify areas and communities at high risk and the measures that will be undertaken to manage the risk, such as local flood plans, flood wardens and flood protection equipment, and where possible the measures ensure that communities take action to manage the risk for themselves.

WBC: One of the existing measures is to:

Work with local communities at risk from flooding to develop Flood Forums and work with these Forums to develop Flood Plans and encourage Flood Wardens.

2.5.2. This section of the **LFRMS has not been amended.**

2.6. Funding and Delivery

2.6.1. The majority of responses felt this section was clear and provided adequate information.

- It was requested that a brief description of partnership funding be included to inform local people/businesses/property owners who may benefit from a scheme that they are able to make contributions.

WBC: The **LFRMS has been amended** to reflect the above comment.

2.7. Review and Development of the LFRMS

2.7.1. The majority of responses received as part of the public consultation agreed with the timeframe for reviewing the LFRMS. Two comments were received suggesting alternative timeframes:

- It is noted that the LFRMS is likely to be reviewed in 2017, following a review of the National Strategy in 2016. It is felt that it would be better if the LFRMS could be developed before the review on the basis of an outcome-focussed set of objectives, leading to an action plan of proposals, with possible funding sources.
- It is suggested that the review should be in response to weather conditions experienced over the next few years and not undertaken at an arbitrary point in time.

WBC: The review of the National Strategy will potentially produce a number of considerations that the Wokingham LFRMS must take account of. Updating the Wokingham LFRMS in full prior to the update of the National Strategy is likely to result in abortive works and additional costs. The LFRMS will be continually monitored and updated as additional information on flood risk becomes available to ensure it is as up-to-date, relevant and useful as possible.

2.7.2. This section of the **LFRMS has not been amended**.

2.8. Appendices

- It was suggested that additional information be provided in an appendix relating to SuDS and how SuDS can be incorporated within developments to manage surface water runoff to benefit water quality and the environment.

WBC: The above comment will be covered by the Wokingham SuDS policy document, for which there is a measure to develop (currently being drafted). The SuDS policy document will become a SPD.

2.8.1. This section of the **LFRMS has not been amended**.

2.9. General Comments

2.9.1. The following general comments on the document were received:

- The LFRMS needs to be much more catchment based.

WBC: The prioritisation tool will take a more catchment based approach. The strategic nature of the LFRMS does not warrant a catchment based approach and would not be of benefit at this level.

- The LFRMS does not make reference to the increasing problems of gaining insurance for residential and commercial properties.

WBC: This issue is currently being discussed by the Government with the Association of British Insurers, feeding into an agreement called 'Flood Re'. One of the measures in the LFRMS is to: *Prepare a briefing note on Flood Re and what affect it has on new developments.*

- The LFRMS needs to be more specific on timescales, financial implications, how measures will be achieved and how they will be achieved with current resources; no cost benefit analysis has been undertaken for any of the measures.

WBC: As each of the specific actions is looked at in detail, further information on timescales and financial implications will be provided. Cost benefit analysis will be undertaken at the detailed stage; this detailed analysis is not appropriate at this strategic scale. The LFRMS will be a 'living document' and will therefore be updated as and when new information becomes available.

- The pressure on the council to provide more homes could be at odds with the aim of alleviating flood risk unless there is legislative force behind ensuring developers provide and maintain flood defences.

WBC: Objective 3 will ensure the flood risk and drainage information submitted with planning applications is comprehensively reviewed in line with current and appropriate guidance.

- In terms of presentation, the use of various intensities of blue for headings may be ok for a printed document, but the paler headings are hard to read online.

WBC: The colour of the headings in the **LFRRMS have been amended** to ensure they are clearly legible when viewing the document online.

- When it comes to implementing measures, Wokingham Borough Council should organise a meeting for those affected / set to benefit to ensure all views are considered.

WBC: One of the existing measures will address concerns that those affected need to be informed of future flood alleviation schemes / works:

WBC will work with local communities to raise awareness of planned flood alleviation works, the prioritisation system and the need for and benefits of partnership funding.

2.10. Comments on the Consultation

- It was questioned whether the all the neighbouring authorities have been consulted on the LFRMS, and if so, it was stated that this should be stated in the LFRMS.

WBC: All neighbouring authorities have been consulted on the LFRMS, although no comments have been submitted. The **LFRRMS has been amended** to clarify this point.

2.11. Additional Changes

- 2.11.1. Since the LFRMS Draft for Consultation was published, Wokingham Borough Council's responsibility to review, adopt and maintain all surface water drainage systems as the Sustainable Drainage Approving Body (SAB) has been amended. The relevant text in the **LFRRMS has been amended** to reflect these changes.

3. Conclusion

- 3.1.1. Table 1 provides a summary of all of the proposed changes identified against the comments received during the public consultation.

Table 1 – Proposed Changes

Document	Section	Proposed Change
LFRRMS	Objective 3	The wording of Objective 3 has been amended to: "Ensure that planning and decisions take full account of flood risk, avoiding development in inappropriate locations, preventing an increase in flood risk and minimising existing flood risk wherever possible". The revised wording removes the uncertainty in this objective.
LFRRMS	Objective 4	The wording of Objective 4 has been amended to ensure it recognises all flood risk management features, not just structures: " <i>Maintain and, where necessary, improve local flood risk management infrastructure and work with riparian owners to ensure privately owned flood defence assets, features and Ordinary watercourses are well maintained to reduce risk</i> ".

Document	Section	Proposed Change
LFMRS	2.7	Additional information on the impact flooding can have in terms of social, economic and environmental costs, including the historic environment, have been included in this section.
LFMRS	4.2.1.3	A link to the Environment Agency's website providing further information on their flood risk management responsibilities has been added.
LFMRS	4.2.1.1	Wokingham Borough Council's responsibilities under the Flood and Water Management Act in relation to SuDS were altered in December 2014. The relevant section of Table 5 has been amended to reflect the revised process.
LFMRS	4.3.1	As the proposed Sustainable Drainage Body approach was revoked in September 2014 and replaced by amendments to the planning system, Section 4.3.1 has been amended to reflect Wokingham Borough Council's new responsibility as the Local Planning Authority.
LFMRS	4.3 & 4.4	Figure 2 and Section 4.3 have been amended
LFMRS	7.2	A description of Partnership Funding has been added to this section to provide information to those who may be able to make contributions to schemes funded through this mechanism.
LFMRS	8	An additional measure has been included committing to review and update the SFRA. This is a short term measure.
LFMRS	General	The colour of the headings in the document has been amended to ensure they are clearly legible when viewing the document online.

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