

# Local Flood Risk Management Strategy

---

## Consultation Analysis

Following approval from Sutton Council's Environment and Neighbourhood Committee, the draft Local Flood Risk Management Strategy (LFRMS) went out to public consultation on the 10<sup>th</sup> October 2014 and ran until the 31<sup>st</sup> January 2015. The LFRMS along with its supporting documents were available on Sutton Council's Consultation Hub website where there was an accompanying survey for completion. The consultation was advertised on the Council's Flood Risk Management webpage's along with the use of social media. Hard copies of the documents were also made available in the Borough's public libraries where the consultation was supported by advertisement through the use of posters.

The LFRMS was sent out to the key stakeholders and risk management authorities (the Environment Agency, Thames Water and Transport for London) for consultation at the same time.

Compared to the 48 responses which were received in reply to the engagement process ran during the production of the LFRMS, the consultation only received 3 responses and an additional set of comments from Sutton Council's Scrutiny Committee. None of the key stakeholders or risk management authorities replied. This could have been because they were mostly involved in the workshops through which the document was produced.

The Consultation Hub responses can be found in Appendix C1 and Sutton Council's Scrutiny Committee comments can be found in Appendix C2.

## Proposed Changes

Following the consultation, the responses were analysed and it is proposed that the following actions are carried out:

1. **Consultation Hub Question:** Could other partners, businesses, developers and agencies do better to manage flood risk in the LBS? If yes, please elaborate.

**Consultation Hub Response:** Yes. One key cause of flooding is the paving over of driveways increasing runoff. This is still a common occurrence in Worcester Park. I have not seen any action to prevent this despite planning permission being required for any impermeable area 5sqm or bigger.

**Proposed Action:** Para 3.2.4 provides a link to the LPA's Local Plan which will set out the Council's policies on sustainable drainage. Additionally, objective 3 outlined in Para 4.1.1 talks about proactively encouraging sustainable practices and identifying opportunities for holistic water management which would include the reduction of permeable paving (as well as retro-fitting SuDS).  
**Therefore it is not seen that an action is required.**

2. **Scrutiny Committee Comment:** Foreword → In setting the context, the foreword doesn't make reference to recent winters' flooding e.g. A217/Belmont Roundabout which would be fresh in residents' minds. Refers to significant surface water flooding in Mitcham Junction, which is LB Merton. It was suggested that Members could be a useful source of info for officers, in respect of their local knowledge of historical flooding in borough.

**Proposed Action:** The Mitcham Junction reference will be removed and the 2013/14 winter flooding will be mentioned in the foreword (interaction of various sources of flooding).

3. **Scrutiny Committee Comment:** Para 3.2.6 → This paragraph contains a non-exhaustive list of Council owned assets which have a role in flood risk management. It would have been useful to reference soakaways in this list as it is used to reduce surface water runoff; the soakaway cleansing scheme is

referenced in the October 2014 Flood Risk Management report to the Scrutiny Committee as a means of managing flood risk; and the scheme forms part of the action plan for flood alleviation works.

**Proposed Action:** Soakaways will be added to the list of Sutton Council maintained assets.

4. **Scrutiny Committee Comment:** Para 3.3.7 → It was noted that whilst this paragraph talks about insurers' responsibilities and the Flood Reinsurance Scheme, it does not mention the Council's position (if any) about insurance. Officers confirmed that as far as they were aware there was no Council policy on this.

**Proposed Action:** The 'Flood Re' scheme mentioned in this section has not yet been enacted. This paragraph will be re-written to ensure that this point is clear. It will also be added that Sutton Council have no responsibility in terms of insurance.

5. **Scrutiny Committee Comment:** Para 5.2.1 (page 9) → The committee was concerned that info about the identification and prioritisation of work at the CDA's was inconsistent. The strategy explains that 12 CDAs had been identified across Sutton and that 5 areas had been identified as at greatest risk, but it does not explain how this assessment was made or relate it clearly to the action being taken to manage this risk at paragraph 5.2.1.

**Proposed Action:** The 5 CDAs identified as being at greatest risk have been done so based upon the number of properties at risk of flooding due to surface water and local knowledge. This explanation will be added to page 9 using the Surface Water Management Plan for a reference. All 5 of the CDAs have been included in flood mitigation work. As Table 5-1 shows, CDAs 23, 26, 28 and 33 have all had applications submitted for funding. CDA 22 benefitted from the Environment Agency lead Worcester Park Flood Alleviation Scheme which Sutton Council did contribute to. Table 5-1 will be edited to include this.

6. **Scrutiny Committee Comment:** Para 5.3.3 → The committee enquired further into the progress of the review of the IFG and welcomed the news that officers had a list of potential officers for the group and planned to hold their meetings to follow on from the quarterly SW London Strategic Flood Group meetings so that information could be disseminated across the Council. The first meeting was scheduled for February 2015.

**Proposed Action:** No action required.

7. **Scrutiny Committee Comment:** Para 5.3.10 → Members were concerned about properties being publicly listed as having had one or more flood incidents, but were reassured to hear from officers that reports of properties affected by flooding were not published by the Council.

**Proposed Action:** No action required.

8. **Scrutiny Committee Comment:** Para 5.6.8 – 5.7.4 → The committee recognises the difficulties arising from working at a time of financial constraints but would want to see this section provide further commentary on how and when alternative funding sources would be approached.

**Proposed Action:** The LFRMS is a strategic, overview document and so specific details on how and when alternative funding sources should be utilised would be inappropriate. Therefore it is not seen that an action is required.

9. **Scrutiny Committee Comment:** Para 7.2.2 → The committee welcomed the proposal that it takes responsibility to consider the Annual Monitoring Report.

**Proposed Action:** No action required.

10. **Scrutiny Committee Comment:** General → Following discussion around future public engagement with the LFRMS, Committee members welcomed the idea of officers taking the Action Plan and an update on progress to Local Committees (particularly those most affected by Flood Risk). Officers considered adding this as an action under the measure to 'Educate residents to understand how they can influence and get involved in local flood risk management.'

**Proposed Action:** An action will be added to objective 5, measure 5.1 to encompass this comment.

## Appendix C

## APPENDIX C1 – Consultation Hub Responses

What is your name?	What is your email address?	Are you responding on behalf of an organisation?	If yes, what is the name of your organisation?	What is your postcode?
Provided	Provided	No		Provided
		Not Answered		
Provided	Provided	No		Provided

To what extent do you agree or disagree that the strategy has effectively investigated and displayed the flood risk in the London Borough of Sutton?	If you disagree or strongly disagree, please state where you feel we could investigate flood risk further or display the findings better.
Agree	
Neither agree or disagree	
Neither agree or disagree	

To what extent do you agree or disagree that the strategy has covered all of the flood risk management responsibilities?	If you disagree or strongly disagree, please state which flood risk management responsibilities you feel have not been covered clearly enough.
Neither agree or disagree	
Neither agree or disagree	
Neither agree or disagree	

Do you think it is clear which risk management authority is responsible for each risk?	If no, please use the space below to explain your answer
Yes	
No	

To what extent do you agree or disagree that the objectives set out in the strategy best reflect the priorities set by the Council?	If you disagree or strongly disagree, please state which objectives do not best reflect the priorities set by the Council and why you feel this way.
Neither agree or disagree	
Neither agree or disagree	
Agree	

How satisfied or dissatisfied do you feel that the proposed measures and actions will achieve the objectives?	If dissatisfied or very dissatisfied, please state which of the proposed measures and actions you feel will not achieve the objectives and please recommend what could be set out instead.
Dissatisfied	The strategy is a great start and is a good definition of the problem but I'm very sceptical if it will translate in to actions and the physical work required to reduce the risk.
Neither satisfied or dissatisfied	

Neither satisfied or dissatisfied	
<b>Do you feel that other partners, businesses, developers and agencies could do better to manage flood risk in the London Borough of Sutton?</b>	<b>If yes, please elaborate on how you feel that other partners, businesses, developers and agencies could do better to manage flood risk in the London Borough of Sutton.</b>
Yes	One key cause of flooding is the paving over of driveways increasing runoff. This is still a common occurrence in Worcester Park. I have not seen any action to prevent this despite planning permission being required for any impermeable area 5sqm or bigger.
No	
Yes	

<b>To what extent do you agree or disagree that the strategy successfully integrates with other flood risk management strategies relevant to the London Borough of Sutton?</b>	<b>If you answered the previous question as disagree or strongly disagree, which other flood risk management strategies relevant to the London Borough of Sutton do you feel the strategy does not integrate well with?</b>
Neither agree or disagree	
Neither agree or disagree	
Neither agree or disagree	

<b>Do you think that the reviewing process is acceptable?</b>	<b>If no, please explain your response below - If no, what would you suggest should trigger a review?</b>	<b>If you have any other comments, including any concerning the Strategic Environmental Assessment (SEA) or the Habitats Regulations Assessment (HRA) please make them here.</b>
Yes		
Yes		
Yes		



## APPENDIX C2 – Sutton Council's Scrutiny Committee Comments

Page / reference	Comment(s)
Foreword	In setting the context, the foreword doesn't make reference to recent winters' flooding e.g. A217/Belmont Roundabout which would be fresh in residents' minds. Refers to significant surface water flooding in Mitcham Junction, which is LB Merton. It was suggested that Members could be a useful source of info for officers, in respect of their local knowledge of historical flooding in borough.
Para 3.2.6.	This paragraph contains a non-exhaustive list of Council owned assets which have a role in flood risk management. It would have been useful to reference soakaways in this list as it is used to reduce surface water runoff; the soakaway cleansing scheme is referenced in the October 2014 Flood Risk Management report to the Scrutiny Committee as a means of managing flood risk; and the scheme forms part of the action plan for flood alleviation works.
Para 3.3.7	It was noted that whilst this paragraph talks about insurers' responsibilities and the Flood Reinsurance Scheme, it does not mention the Council's position (if any) about insurance. Officers confirmed that as far as they were aware there was no Council policy on this.
Page 9 & Para 5.2.1	The committee was concerned that info about the identification and prioritisation of work at the CDA's was inconsistent. The strategy explains that 12 CDAs had been identified across Sutton and that 5 areas had been identified as at greatest risk, but it does not explain how this assessment was made or relate it clearly to the action being taken to manage this risk at paragraph 5.2.1.
Para 5.3.3.	The committee enquired further into the progress of the review of the IFG and welcomed the news that officers had a list of potential officers for the group and planned to hold their meetings to follow on from the quarterly SW London Strategic Flood Group meetings so that information could be disseminated across the Council. The first meeting was scheduled for February 2015.
Para 5.3.10	Members were concerned about properties being publicly listed as having had one or more flood incidents, but were reassured to hear from officers that reports of properties affected by flooding were not published by the Council.
Para 5.6.8 – 5.7.4	The committee recognises the difficulties arising from working at a time of financial constraints but would want to see this section provide further commentary on how and when alternative funding sources would be approached.
Para 7.2.2	The committee welcomed the proposal that it takes responsibility to consider the Annual Monitoring Report.
General	Following discussion around future public engagement with the LFRMS, Committee members welcomed the idea of officers taking the Action Plan and an update on progress to Local Committees (particularly those most affected by Flood Risk). Officers considered adding this as an action under the measure to 'Educate residents to understand how they can influence and get involved in local flood risk management.'