

Exe Catchment Flood Management Plan – Revised Action Plan

Policy Unit PU1 – Greater Exeter

Policy 5 – Areas of moderate to high flood risk where we can generally take further action to reduce flood risk

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
2009	Investigate how we can improve the environmental and flood risk management performance of our existing systems through Exeter and Stoke Canon. Environmental enhancements to form an integral part of these schemes wherever possible.	PE1 ECON1 ECON2 ENV1 ENV2 ENV4	FRM Strategy Plan carried out for Exeter and Stoke Canon. Note that a Pre-Feasibility Study for Exeter has been completed (April 2007). Strategy includes or fully considers upstream measures and environmental enhancements.	FRM Strategy Plan completed. (Pre-Feasibility Study has already been completed). If appropriate, leading to schemes identified on the FRM business plan for implementation.	Environment Agency Exeter City Council Possibly Devon County Council if there is a likely impact on highways drainage.	2012	HIGH
2009	Evaluate risk to critical infrastructure , especially between Exeter and Stoke Canon: Pynes WTW and mainline railway	PE1 ECON1 ECON2 ENV1 ENV2 ENV4	Level of risk identified Include within FRM Strategy Plan.	Emergency plans take account of our understanding of risk Included within FRM Strategy plan	South West Water Network Rail Utilities	2012	HIGH
2009	Investigate the risk of flooding to the waste water treatment works in Stoke Canon, Countess Weir, and the main sewer along the Exeter canal embankment in relation to FRM works. These have the potential to cause serious pollution if flooding occurs.	ENV1 ENV4	Study carried out to identify key risk areas. Possibly linking into proposals for specific mitigation measures.	Study completed. Key risk areas identified. Leading to projects to put in place mitigation measures initiated. In the long term, reduction in risk of disruption to water and sewerage, and pollution in particular to the Exe estuary SPA / Ramsar site.	South West Water Environment Agency	2012	HIGH

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
2009	Investigate locations and routes for birds to find compensatory high water roosts as the estuary changes and if this can also provide flood risk benefits. In particular, investigate if use can be made of land between Exwick Radial Gates and Cowley Bridge both for this purpose and for flood attenuation / washlands.	Potentially all objectives	Sea level rise monitored Habitat at risk identified Alternative habitat sites identified. Evaluate options within FRM Strategy Plan	No net loss of habitat suitable for use by bird interest features of the SPA. Compliance with Defra guidance. Include within FRM Strategy Plan	Environment Agency RSPB Natural England Exeter City Council Landowners	2012	LOW
2009	Investigate opportunities to restore areas of the North Brook and Pin Brook in Exeter, both to provide environmental enhancements and to reduce flood risk (e.g. from blockages to culverted sections).	PE1 ECON1 ENV1 ENV2 ENV4 ENV5	Feasibility Study	Feasibility Study completed with recommendations for taking the study forward. Specific measures identified for both the North Brook and Pin Brook – which will lead to: - a reduction in number of properties at risk, particularly as a result of blocked culverts e.g. on the North Brook - environmental enhancements	Exeter City Council Environment Agency Natural England	2020	LOW
2009	Take action to reduce the impact of flooding, through improved flood forecasting and engaging local partners and community in flood awareness, incident management, emergency response. Make use of new technology as this becomes available.	PE1 ECON1 ECON2 ENV1	Flood warning lead time. Number of properties covered by warning service. Community awareness of reducing flood impact / number of flood wardens. Use of new technology.	Level of flood warning improved.	Environment Agency Exeter City Council	2015	HIGH
2011	Work with partners to retro-fit SuDs in problem areas. Including identifying and retro-fitting SuDs where problems of highways drainage entering sewerage systems have been identified. Ensure that	PE1 ECON1 ECON2	Study / Consultation to identify key problem areas and appropriate methods of remediation, retro-fitting and ongoing maintenance regimes	Report completed, leading to specific, appropriate, durable and practical retro-fitting measures identified including appropriate capacity to cater for Climate	Devon County Council Environment Agency	2020	LOW

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
	allowance is made for a commuted sum for future maintenance of SuDs.	ENV4 possibly ENV1 depending on SuDS scheme.	(including funding). Incidents of Surface Water flooding recorded.	Change and design to failure, and then implemented. Significant number of retro-fit SuDs schemes installed. Problems of highways drainage run-off entering sewers reduced.	South West Water		
2009	Ensure spatial planning and development does not increase flood risk (PPS25).	PE1 ECON1	Number of planning applications decisions allowing inappropriate development in the flood plain.	Compliance with PPS25 No inappropriate planning applications approved in the floodplain. No developments approved by local authority against EA advice.	Developers Exeter City Planning Authority East Devon Planning Authority Environment Agency	Ongoing	HIGH
2009	Investigate ways in which people can be moved out of risk areas over the lifetime of the CFMP, particularly as poor housing stock deteriorates over the longer term. Investigate also if critical infrastructure can also be moved out of risk areas over the lifetime of the CFMP.	PE1 ECON1	Local development document – possibly linking back to policy development at national level. Philosophy of approach clarified by Environment Agency (in particular, consider Mincinglake, Northbrook, Pin Brook and Alphinbrook)	Included in Local Development Framework. Areas where future river and flood plain restoration may be considered are identified.	Environment Agency, including link back to National Policy Team Consultation with Exeter City Council very important At national level, Defra, and Secretary of State	2050	LOW

Policy Unit PU2 – Tiverton

Policy 5 – Areas of moderate to high flood risk where we can generally take further action to reduce flood risk

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
2009	Investigate how we can improve the environmental and flood risk management performance of our existing systems through Tiverton. Environmental enhancements to form an integral part of these schemes wherever possible.	PE1 ECON1 ECON2 ENV1 ENV2 ENV4	FRM Strategy to be carried out for the defences in Tiverton including the River Exe and River Lowman Fully considers upstream measures in policy unit 7 and how benefits could be passed on downstream. Strategy needs to be included on the FRM business plan.	FRM Strategy completed. If appropriate, subsequently leading into a Feasibility Study and implementation. Project needs to be included on the FRM business plan.	Environment Agency Mid Devon District Council	2020	High
2009	Investigate if use can be made of land next to the River Lowman in Tiverton for flood storage / washlands– for example Grid Refs: SS 963 129 and SS 967 131	PE1 ECON1 ECON2 ENV1 ENV2 ENV4	Study carried out – likely to be included within the FRM Strategy in the above action. Possibly take into account the proposed new cycleway from Tiverton to Crediton.	FRM Strategy identifies if potential flood storage areas / washlands on the River Lowman in Tiverton can practicably be used for this purpose, and includes environmental enhancements	Environment Agency Mid Devon District Council Landowners / local community with an interest in this land.	2020	Medium
2009	There may be an opportunity for improvements to be made to reduce flood risk as part of new developments (for example, developments next to the Lowman). In addition, ensure existing Third Party flood risk infrastructure is maintained – for example, on the West Bank of the Exe in Tiverton. As part of managing future flood risk to new developments, the local authority may specify a sum of money to be retained specifically for	PE1 ECON1 ECON2 ENV4 Possibly ENV1	Development Control to ensure new developments maximise opportunity for channel improvements. Identify all Third Party flood risk infrastructure.	New developments take the opportunity to include appropriate channel improvements. Long term maintenance of SuDs is taken into account. Third Party infrastructure is identified within NFCDD and its condition and maintenance regime determined.	Developers Mid Devon District Council Environment Agency Third Party owners of flood risk infrastructure	2010	Medium

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
	future maintenance purposes – i.e. a commuted sum, particularly for SuDs.						
2011	Work with partners to retro-fit SuDs in problem areas. Including identifying and retro-fitting SuDs where problems of highways drainage entering sewerage systems have been identified. Ensure that allowance is made for a commuted sum for future maintenance of SuDs.	PE1 ECON1 ECON2 ENV4 possibly ENV1 depending on SuDS scheme.	Consultation to identify key problem areas and appropriate methods of remediation, retro-fitting and ongoing maintenance regimes (including funding). Incidents of Surface Water flooding recorded.	Specific, appropriate, durable and practical retro-fitting measures identified including appropriate capacity to cater for Climate Change and design to failure, and then implemented. Significant number of retro-fit SuDs schemes installed. Problems of highways drainage run-off entering sewers reduced.	Devon County Council Environment Agency Highways Agency South West Water	2020	Low
2009	Take action to reduce the impact of flooding, through improved flood forecasting and engaging local partners and community in flood awareness, incident management, emergency response. Make use of new technology as this becomes available.	PE1 ECON1 ECON2 ENV1	Flood warning lead time. Number of properties covered by warning service. Community awareness of reducing flood impact / number of flood wardens. Use of new technology.	Level of flood warning improved.	Environment Agency Mid Devon District Council	2015	High
2009	Investigate ponding of water behind defences in Tiverton if flooding does occur, and if intervention is needed to reduce the duration of flooding if this does occur. (i.e. to reduce impact).	PE1 ECON1	Locations identified as part of FRM Strategy Plan identified above. Options investigated (including flap valves and pumping) Study included in Strategy Plan	Plan completed and includes this action, If appropriate, triggering remedial works included within FRM business plan.	Environment Agency	2020	Medium
2009	Evaluate risk to Critical Infrastructure: Hospital, School, WTW, STW, Evacuation	PE1	Level of risk identified Include within strategy plan	Emergency plans take account of our understanding of risk	Utilities South West Water	2009	High

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
	Centres. Use this to help inform action PU2.9			Included within FRM Strategy Plan	Emergency Planners Education Authority Primary Care Trust		
2009	Ensure spatial planning and development does not increase flood risk (PPS25).	PE1 ECON1	Number of planning applications decisions allowing inappropriate development in the flood plain.	Compliance with PPS25 No inappropriate planning applications approved in the floodplain. No developments approved by local authority against EA advice.	Developers Mid Devon District Council Environment Agency	Ongoing	High
2009	Investigate ways in which people can be moved out of risk areas over the lifetime of the CFMP, particularly as poor housing stock deteriorates over the longer term. Investigate also if critical infrastructure can also be moved out of risk areas.	PE1 ECON1	Local Development Documents – possibly linking back to policy development at national level. Philosophy of approach clarified by Environment Agency. (Wellbrook, Cowley Moor, Tidecombe Stream))	Included in Local Development Frameworks and our FRM Strategy as identified above. Areas where future river and flood plain restoration may be considered are identified.	Environment Agency, including link back to National Policy Team Consultation with Mid Devon District Council very important At national level, Defra, and Secretary of State	2050	Low
2009	Investigate measures upstream to reduce the flood risk. Look at ways of influencing land use and land management practices in the Lowman catchment. See also Policy Unit 7.	Potentially, all objectives.	Strategic Plan developed to influence Land Management; investigating more specific measures and actions – to consider, for example, woodland planting, wetland creation, hedgerow planting, and other land use changes. Including consultation with	Strategic Plan completed, including consensus / agreement with all organisations responsible. This will then inform the FRM Strategy mentioned above and also specific FRM projects if appropriate	Environment Agency NFU FWAG Landowners / farmers	2020	Medium

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
			organisations responsible, taking into account issues of funding mapping of potential areas landscape character.		Natural England Mid-Devon District Council		
2009	Improve awareness and resilience in communities at risk of fast onset flooding with deep and fast flows, and assess if works to reduce the flood risk are possible.	PE1	Communities identified Local Resilience forums plan appropriately. Works identified if appropriate.	Emergency planning takes account of risk of fast onset flooding with deep and fast flows. Works implemented if appropriate.	Environment Agency Devon County Council Local Resilience Forum partners	Ongoing	High

Policy Unit PU3 – Cullompton

Policy 5 – Areas of moderate to high flood risk where we can generally take further action to reduce flood risk

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
2009	Investigate the response of the River Culm and Spratford Stream to high flows – particularly the interaction of flows with the M5 (which cuts the floodplain in half), the railway line and the possible eastern route for the new Cullompton by-pass (which will require working with the Highways Agency). This may involve modelling work and should include identifying if hedge and floodplain woodland planting can attenuate flows, ensuring that measures are in-keeping with landscape character. Link this into the following action.	PE1 ECON1 ECON2	Study carried out, probably in collaboration with the Highways Agency and involving modelling work, to gain a better understanding of flood flows for the Culm and Spratford Stream in the Cullompton area. Measures implemented in consultation with Mid Devon District Council are in-keeping with landscape character.	Study completed and interaction of floodwater with M5 / railway / eastern by-pass clarified. Information from this study then links in to the following action.	Environment Agency Highways Agency Mid Devon District Council Devon County Council (Highways) Network Rail	2012	High

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
2009	Prepare Asset Management Plan to identify where future works may be required to reduce risk to Cullompton.	PE1 ECON1 ECON2	Asset Management Plan development.	Asset Management Plans identify key assets where future works are targeted. Possibly identifying need for a Feasibility Study, if appropriate, which would need to be included in the FRM business plan.	Environment Agency	2012	Medium
2011	Work with partners to manage surface water flooding issues in Cullompton, particularly in relation to new development on the west side of Cullompton, and the possible western route for the new Cullompton by-pass. Incorporating the use of SuDs. Ensure that allowance is made for a commuted sum for future maintenance of SuDs.	PE1 ECON1 ECON2 ENV1	Incidents of surface water flooding recorded. A plan to manage surface water run off developed, investigating the impact of the western by-pass and proposed new development on surface water flooding issues. Fitting of SuDs to both new and existing development (i.e. retro-fitting) to be considered.	Surface Water Management Plan completed.	Devon County Council Mid Devon District Council Environment Agency Highways Agency Developers	2015	Medium
2009	Investigate opportunities to make hydraulic and environmental improvements to the tributary streams, both to provide environmental enhancements and to reduce flood risk from blockages to culverted sections. In particular, look at the possibility of opening up culverted sections. This may be done in conjunction with the following action:	PE1 ECON1 ENV1	Plan to improve the management of surface waters developed to identify specific problem areas and identify solutions in which environmental enhancements form an integral part.	Plan completed, leading, if appropriate, to specific remedial projects. These need to be included on the FRM business plan. This may also be linked to the following action.	Environment Agency Mid Devon District Council	2025	Low
2009	Investigate ways in which people can be moved out of risk areas over the lifetime of the CFMP, particularly as poor housing stock deteriorates over the longer term. Investigate also if critical infrastructure can also be moved out of risk areas.	PE1 ECON1	Local Development Document – possibly linking back to policy development at national level. Philosophy of approach clarified by Environment Agency.	Include in Local Development Framework. Areas where future river and flood plain restoration may be considered are identified.	Environment Agency, including link back to National Policy Team Consultation with	2050	Low

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
			(Cole Brook and Crow Green Stream).		Mid Devon District Council very important At national level, Defra, and Secretary of State		
2009	Ensure spatial planning and development does not increase flood risk (PPS25).	PE1 ECON1	Number of planning applications decisions allowing inappropriate development in the flood plain.	Compliance with PPS25 No inappropriate planning applications approved in the floodplain. No developments approved by local authority against EA advice.	Developers Mid Devon District Council Environment Agency	ON-GOING	High
2009	Take action to reduce the impact of flooding, through improved flood forecasting and engaging local partners and community in flood awareness, incident management, emergency response. Make use of new technology as this becomes available. Investigate if some level of flood warning coverage may be feasible on the tributary streams.	PE1 ECON1 ECON2 ENV1	Flood warning lead time. Number of properties covered by warning service. Community awareness of reducing flood impact / number of flood wardens. Use of new technology. Flood warning coverage on tributary streams (Cole Brook and Crow Green Stream).	Level of flood warning improved.	Environment Agency Mid Devon District Council	2015	High
2009	Engage landowners to influence land use and land management practices in the upper Culm catchment, which is relatively shallow and low lying and has the potential to significantly reduce and attenuate peak flows by holding back flood water.	Potentially, all objectives.	Strategic Plan developed to influence Land Management; investigating specific measures and actions – to consider, for example, improving soil condition, buffer strips, woodland planting, wetland creation, hedgerow planting,	Strategy Plan completed, including consensus / agreement with all organisations responsible. This will then link into specific FRM projects if appropriate which will need to be included in the FRM	Environment Agency NFU FWAG Landowners /	2015	Medium

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
	See also Policy Unit 7.		and other land use changes. Including consultation with organisations responsible, taking into account issues of funding mapping of potential areas landscape character.	business plan.	farmers Natural England Mid Devon District Council		

Policy Unit PU4 – Exe Estuary Towns and Infrastructure

Policy 5 – Areas of moderate to high flood risk where we can generally take further action to reduce flood risk

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
2009	Investigate ways in which existing flood defence schemes in urban areas e.g. Withycombe Brook in Exmouth can be upgraded, taking into account flows and sea level rise since their construction, and in particular considering issues of tide-locking. Environmental enhancements to form an integral part of any upgrading of schemes wherever possible.	PE1 ECON1 ECON2 ENV1 ENV4	We will assess the current schemes / systems and their components, taking into account, where appropriate, the Exe Estuary Strategy (see note above). Also, giving due consideration to the Exe Estuary Cycle Route.	Assessment completed. If appropriate, subsequently linking in to Feasibility Study – this needs to be included in the FRM business plan. Note that in practice changes to some schemes such as the Withycombe Brook may be very difficult to implement due to their current construction.	Environment Agency Teignbridge District Council East Devon District Council Network Rail	2015	Medium

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
2011	Work with partners to retro-fit SuDs in problem areas. Including identifying and retro-fitting SuDs where problems of highways drainage entering sewerage systems have been identified. Ensure that allowance is made for a commuted sum for future maintenance of SuDs. Identifying where SuDs could be fitted to include areas where surface water problems 'pluvial flooding' are associated with tide-locking.	PE1 ECON1 ECON2 ENV4 possibly ENV1 depending on SuDS scheme.	Consultation to identify key problem areas and appropriate methods of remediation, retro-fitting and ongoing maintenance regimes (including funding). Incidents of Surface Water flooding recorded.	Specific, appropriate, durable and practical retro-fitting measures identified including appropriate capacity to cater for Climate Change and design to failure, and then implemented. Significant number of retro-fit SuDs schemes installed. Problems of highways drainage run-off entering sewers reduced.	Devon County Council Environment Agency Highways Agency South West Water	2020	Low
2009	Ensure spatial planning and development does not increase flood risk (PPS25).	PE1 ECON1	Number of planning applications decisions allowing inappropriate development in the flood plain.	Compliance with PPS25 No inappropriate planning applications approved in the floodplain. No developments approved by local authority against EA advice.	Developers East Devon District Council Teignbridge District Council Environment Agency	Ongoing	High
2009	Take action to reduce the impact of flooding, through improved flood forecasting and engaging local partners and community in flood awareness, incident management, emergency response. Make use of new technology as this becomes available.	PE1 ECON1 ECON2 ENV1	Flood warning lead time. Number of properties covered by warning service. Community awareness of reducing flood impact / number of flood wardens. Use of new technology.	Level of flood warning improved.	Environment Agency Exeter City Council	2015	High
2009	Investigate ways in which people can be moved out of risk areas over the lifetime of the CFMP, particularly as poor housing stock deteriorates over the longer term. In this	PE1 ECON1	Local Development Documents – possibly linking back to policy development at national level. Philosophy of approach	Included in Local Development Frameworks. Areas where future river and floodplain restoration may be considered are identified.	Environment Agency, including link back to National Policy	2050	Low

Year Added/ Amended	Action	Objective	Monitoring indicator	Success criteria	Organisations responsible (lead first)	Timescale	Priority
	<p>policy unit, consider in particular mobile homes / caravan parks in the Dawlish Warren area.</p> <p>Investigate also if critical infrastructure can also be moved out of risk areas.</p>		clarified by Environment Agency.	In this particular policy unit, specific mobile homes / caravan parks are identified.	<p>Team</p> <p>Consultation with Teignbridge District Council very important</p> <p>At national level, Defra, and Secretary of State</p>		
2009	Investigate measures upstream to reduce the risk. Engage landowners to influence land use and land management practices in the catchments within and upstream of the policy unit, for example in the River Kenn catchment where land use issues have previously resulted in flooding in Kennford.	Potentially, all objectives	Plan developed to investigate more specific measures and actions – to consider, for example, improving soil condition, using buffer strips, woodland planting, wetland creation, hedgerow planting, and other land use changes. Including consultation with organisations responsible, taking into account issues of funding mapping of potential areas landscape character.	<p>Plan to influence land management completed, including consensus / agreement with all organisations responsible.</p> <p>This will then link into specific FRM projects if appropriate which will need to be included in the FRM business plan.</p>	<p>Environment Agency</p> <p>NFU</p> <p>FWAG</p> <p>Landowners / farmers</p> <p>Natural England</p> <p>Teignbridge District Council</p> <p>East Devon District Council</p> <p>Exeter City Council</p>	2025	Low
2009	Improve awareness and resilience in communities at risk of fast onset flooding with deep and fast flows, and assess if works to reduce the flood risk are possible. Taking into account results from our assessment of rapid responding catchments.	PE1	<p>Communities identified</p> <p>Local Resilience forums plan appropriately. Works identified if appropriate.</p>	<p>Emergency planning takes account of risk of fast onset flooding with deep and fast flows.</p> <p>Works implemented if appropriate.</p>	<p>Environment Agency</p> <p>Devon County Council</p> <p>Local Resilience Forum partners</p>	Ongoing	High

Schedule of Change

CFMPs remain live documents. As such, our understanding of risk and the actions (measures) to manage these risks are liable to change. Since the publication of the Exe CFMP in December 2009 a number of changes have taken place. Below is a summary of changes to the actions (measures) since its publication in 2009.

Policy Location	Action	Comment	Change	Date of change
2011				
Following the introduction of the Flood Risk Regulations (2009) and the Flood and Water Management Act (2010) the roles and responsibilities of flood risk management authorities has changed.				
As well as this, a framework for implementation has been developed which has altered our approach to annual monitoring. As such, a whole scale review of actions (measures) within the South West has been undertaken to ensure CFMPs adequately reflect these important pieces of legislation.				
Changes to this action plan include:-				
<ul style="list-style-type: none"> • Amendment to four actions • Inclusion of a schedule of change 				
Greater Exeter	Work with partners to retro-fit SuDs in problem areas. Including identifying and retro-fitting SuDs where problems of highways drainage entering sewerage systems have been identified. Ensure that allowance is made for a commuted sum for future maintenance of SuDs.	Lead organisations should be LLFA – Exeter City Council	Set Lead Organisation as Devon County Council	September 2011
Tiverton	Work with partners to retro-fit SuDs in problem areas. Including identifying and retro-fitting SuDs where problems of highways drainage entering sewerage systems have been identified. Ensure that allowance is made for a commuted sum for future maintenance of SuDs.	Lead organisation should be LLFA - Somerset	Set Lead Organisation as Devon County Council	September 2011
Cullompton	Work with partners to manage surface water flooding issues in Cullompton, particularly in relation to new development on the west side of Cullompton, and the possible western route for the new Cullompton by-pass. Incorporating the use of SuDs. Ensure that allowance is made for a commuted sum for future maintenance of SuDs.	Lead organisation should be LLFA – Devon County	Set Lead Organisation as Devon County Council	September 2011

Policy Location	Action	Comment	Change	Date of change
Exe Estuary Towns	Work with partners to retro-fit SuDs in problem areas. Including identifying and retro-fitting SuDs where problems of highways drainage entering sewerage systems have been identified. Ensure that allowance is made for a commuted sum for future maintenance of SuDs. Identifying where SuDs could be fitted to include areas where surface water problems 'pluvial flooding' are associated with tide-locking.	Lead organisation should be LLFA – Devon County	Set Lead Organisation as Devon County Council	September 2011