



Consultation on the draft flood risk management plans - summary response document

We are the Environment Agency. We protect and improve the environment and make it a better place for people and wildlife.

We operate at the place where environmental change has its greatest impact on people's lives. We reduce the risks to people and properties from flooding; make sure there is enough water for people and wildlife; protect and improve air, land and water quality and apply the environmental standards within which industry can operate.

Acting to reduce climate change and helping people and wildlife adapt to its consequences are at the heart of all that we do.

We cannot do this alone. We work closely with a wide range of partners including government, business, local authorities, other agencies, civil society groups and the communities we serve.

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# Foreword

The devastating impact that flooding has on communities was demonstrated during the 2013/14 winter flooding. Flood risk management organisations and communities at risk of flooding will continue to face challenges in the future as the climate changes and the population increases.

Flood Risk Management Plans (FRMPs) identify the risk from flooding and set out the objectives and actions for managing that risk over the next six years. They bring together information about all sources of flooding, coastal erosion and the work that is planned by a range of organisations to manage flood risk. FRMPs are required by the European Union Floods Directive and are an important planning tool to promote awareness and understanding of flood risk, as well as guiding funding and resources to where the risks are greatest.

The Environment Agency sought views on the draft FRMPs during the consultation that ran from 10 October 2014 to 31 January 2015. The feedback from consultation is helping to shape the format and content of the final FRMPs, which are due to be published in December 2015.

Around 400 responses were received and this high level of engagement from organisations and individuals highlights the importance of flood risk management and the need for continued partnership working. The views and opinions expressed are wide ranging and sometimes contradictory. The feedback has helped to update the flood risk management plans and will inform decisions on how flood risk is managed.

This document summarises the range of comments made by partners involved in the management of floods and other interested organisations and individuals. Further information on how consultation feedback has helped us finalise both the flood risk management plans and river basin management plans can be found in '*Acting on your responses to the draft update to the river basin management plan and flood risk management plan consultations 2015*', due to be published on the 30 October 2015.

I would like to thank everyone who has taken part in the consultation and we look forward to working with you on the implementation of the FRMPs.



**Andy Wilkinson**

Deputy Director, FCRM Strategy Delivery  
Environment Agency

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# 1. Introduction

The European Union Floods Directive 2007/60/EC came into force in November 2007. The Floods Directive is implemented in the UK by the Flood Risk Regulations 2009. This legislation sets out a six year planning cycle where member states are required to map the extent of flood risk, identify what is at risk in these areas and to take adequate and coordinated measures to reduce the risk.

The Environment Agency is the responsible authority for producing Flood Risk Management Plans (FRMPs) for England covering flooding from main rivers, reservoirs and the sea. Lead local flood authorities (LLFAs) must prepare FRMPs in Flood Risk Areas (FRAs), where the risk of flooding from local flood risks is significant (identified in Preliminary Flood Risk Assessments as 30,000 people or more at risk of flooding from surface water, groundwater and ordinary watercourses).

The Environment Agency has worked in partnership with 104 LLFAs to develop 10 draft FRMPs which were published for consultation on the 10 October 2014. These cover ten river basin districts (RBDs) in England, listed in Table 1. The Severn and the Dee FRMPs were produced jointly with Natural Resources Wales and the Solway Tweed FRMP jointly with the Scottish Environmental Protection Agency. All FRMPs were accompanied by an environmental report, documenting the Strategic Environmental Assessment (SEA).

The timing of the consultation coincided with the consultation on the 2<sup>nd</sup> cycle of River Basin Management Plans (RBMPs) which are required under the European Union Water Framework Directive. It was important that the two consultations took place together to enable stakeholders to see the linkages and comment on the full extent of measures proposed to manage the water environment and to deliver integrated outcomes.

## 1.1. Consultation response

The consultation received nearly 400 responses. Table 1 shows the number of consultation responses received per RBD.

**Table 1 Number of consultation responses per River Basin District**

River basin district	Number of responses
Anglian	46
Dee	17*
Humber	43
Northumbria	18
North West	64
Severn	30*
Solway Tweed	19*
South East	38
South West	32
Thames	64
More than one / all RBD	22
Total	393

\* totals show only those responses received for the English side of the RBDs

The consultation included the following questions:

**Question 1:** Do you agree that this draft plan sets out the most significant flood risk issues for your area?

**Question 2:** What do you consider to be the highest priorities for managing the risk of flooding in your area?

**Question 3:** Do you understand the objectives as described in the draft plan?

**Question 4:** Is the balance right between the 'social', 'economic' and 'environmental' objectives, as explained in the draft plan?

**Question 5:** Are there other flood risk management objectives that should be included?

**Question 6:** Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan?

**Question 7:** Across all proposed, agreed and ongoing measures, the plan describes 'prevention', 'preparation', 'protection' and 'recover and review' approaches. Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?

**Question 8:** Are there other proposed measures that should be included?

**Question 9:** How can you support the work set out in the draft flood risk management plan to reduce flood risk?

**Question 10:** Are there things you think should be done to improve co-ordination of river basin and flood risk management planning?

**Question 11: (South West and Severn River Basin Districts only)** We have proposed a change to the boundary between the Severn and South West River Basin Districts. Do you agree this proposed change should be adopted in the final plan?

### **Strategic Environmental Assessment Consultation Questions**

**Question 12:** Do you agree with the conclusions of the environmental assessment? (yes / no). If not, please explain why.

**Question 13:** Are there any further significant environmental effects of the draft plan which you think should be considered? (yes / no). If yes, please describe what they are.

We have described potentially 'negative effects' of the draft plan on the environment which would need mitigation, as well as wider opportunities to achieve 'positive effects'.

**Question 14:** Are there further mitigations or opportunities that should be considered for the plan? (yes / no). If yes, please give details.

It was possible for individuals and organisations to respond to the consultation in a format that suited them, including online or email responses, verbally at meetings, or by written correspondence. Responses received during the consultation are being used to amend and finalise the FRMPs for their publication in December 2015.

The Environment Agency worked in partnership with Natural Resources Wales and the Scottish Environmental Protection Agency on the cross border FRMPs. The Environment Agency consulted on the English side of these RBDs.

## 1.2. Consultation on the updated River Basin Management Plans

The Environment Agency launched the FRMPs consultation at the same time as the draft RBMP consultation, recognising the need to have strong links between the two plans to deliver the best outcomes for the water environment. The communications and engagement were further aligned by incorporating FRMP messages into RBMP communication materials and equipping Environment Agency staff with the knowledge to talk about both consultations at meetings with stakeholders.

## 1.3. Purpose of this document

The Environment Agency is reviewing all of the comments received during the consultation and, where appropriate, the plans are being changed to take account of the responses. This document has been published to:

- share an overview of the feedback received for each consultation question, at a national level and for each RBD
- present summary information on
  - the number of responses submitted
  - the types of organisations that responded
- summarise the consultation and engagement process
- explain the next steps in flood risk management planning

This document covers the whole of England and reflects responses received for the 10 RBDs listed in Table 1 including the English parts of the Solway Tweed, Severn and the Dee river basin districts.

## 2. National feedback

This section covers the consultation responses submitted for all or more than one RBD. Some of these responses were submitted using the e-consultation tool answering the consultation questions. Other responses were received via letter or email and although not always in the question format they have provided valuable feedback on the draft FRMPs.

22 responses were received, containing a mixture of positive and negative comments towards the draft Flood Risk Management Plans (FRMPs). A number of responses focused on the measures and objectives and what the future expectations of the plan are. A lot of consultees felt that the FRMPs were too high level and that their purpose was not clear. Respondents also felt that the plans were too large and the layout confusing, making them a difficult document to read and access key information.

The word diagram below illustrates some of the key themes that were raised during the consultation.



The National responses came from a variety of organisations. A detailed breakdown of responses by organisation type is shown in Table 2.

**Table 2 Breakdown of national responses by organisation type**

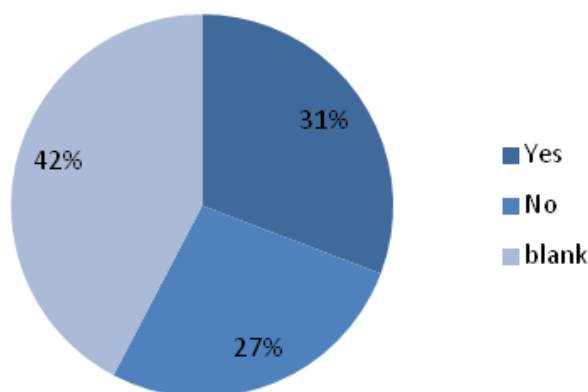
Organisation type	Number of responses	%
Academia	1	4.5%
Individual	2	9 %
Utilities	1	4.5%
Environment management (including NGOs)	7	32%
Government, local	3	13.5 %
Government, national	2	9 %
Leisure and tourism	2	9 %
Other	4	18.5 %
<b>Total</b>	<b>22</b>	



## 2.1. Summary of consultation feedback

The following pages summarise for each question the general themes emerging from the consultation and highlights areas that are being taken into consideration for the final FRMP.

### Question 1 “Do you agree that this draft plan sets out the most significant flood risk issues for your area? (Yes/No) If not, please explain what you think is missing.”



Responses to this question were fairly evenly split between yes and no. As a result it is inconclusive as to whether all of the draft FRMPs included the most significant flood risk issues. Those responses which agreed came from a variety of organisation types (Environment Management NGOs, local and national government and Utilities.)

*“The draft plans set out the most significant flood risk issues”*

27% of responders felt that the draft FRMPs did not cover the most significant flood risk issues and highlighted a range of additional themes which they felt

required greater emphasis. Multiple responses identified climate change as an issue which was perceived as not being covered in sufficient detail. Responders felt that FRMPs did not reflect the most up to date climate science and should include more information on the potential impacts.

*“Climate change and population growth combined with austerity will require a new approach to managing flood risk”*

Many respondents felt that the draft FRMP did not adequately represent all sources of flood risk, highlighting that the contributions from local authorities who are responsible for surface water were only present in some catchments, whereas some catchments just contained information on rivers and the sea. Coastal and surface water flood risk were highlighted as being inconsistently represented within some of the plans, as a result it was felt that some plans do not provide a full picture of flood risk.

*“The voluntary submission of data by some authorities, but not others leads to an incomplete picture of risks”*

Amongst those responders who felt that the plan did not cover all of the significant flood risk issues, the common themes which they felt were missing included:

- the Catchment Based Approach (CaBa) – as a means of identifying opportunities for flood risk management to deliver wider environmental benefits
- natural flood management – using upstream storage and land management practices to hold water back.

## Question 2 “What do you consider to be the highest priorities for managing the risk of flooding in your area?”

One of the most commonly raised priorities was the protection of people and property. Responders also raised a wide variety of other priorities for flood risk management with some shared themes as set out below.

One theme mentioned multiple times was the need for flood risk management to deliver wider environment benefits and for more integration with environment and water quality management. Responders commented that working with natural processes and incorporating ecological expertise into the design of flood defence schemes would help to achieve this.

*“Take a sustainable and holistic approach to all water management, joining up FCERM/water resources/ environmental management”*

The importance of maintenance, particularly of watercourses and existing flood defence assets was identified as a priority for some responders who felt that the draft plan places too much emphasis on capital flood defence schemes.

*“The draft FRMPs are generally disproportionately focussed on capital flood defence schemes and do not give sufficient attention to the importance of maintenance of existing assets in managing flood risk.”*

Protecting business, the economy and critical infrastructure from flooding was another issue raised in many of the responses. One such response highlighted the national importance of critical infrastructure and suggested that it could be included on the Environment Agency flood maps.

*“This would act as a reminder for all stakeholders that potential influences on such infrastructure of possible flood management interventions elsewhere in a River Basin District should be considered”*

Other priorities which respondents highlighted should be considered were:

- protection of agricultural land and food security as some responders feel that the existing capital funding mechanism undervalues agricultural land
- partnership working
- education and increasing awareness of flood risk
- community resilience
- taking an evidence based approach to flood risk management decisions
- incorporating the effects of climate change into flood risk management



### Question 3 “Do you understand the objectives as described in the draft plan?”

Approximately three quarters of those who responded to this question agreed that they understood the objectives outlined in the draft FRMP.

One of the responses whilst answering yes to this question also felt that protecting the economy was under represented in the FRMP. Also questioned the inclusion of coastal erosion in the objectives of some of the FRMPs. Whilst they welcomed the concept they questioned whether FRMPs was the right place for this given the general lack of coastal erosion in the plans.

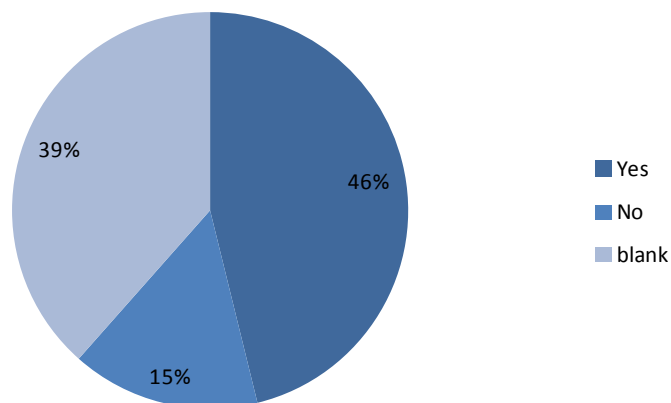


Figure 2 National responses to question 3

*“the FRMP is not necessarily the most appropriate place to highlight it (unless the breadth of the FRMP is broadened to include coastal erosion)”*

Those who answered no to this question gave the following reasons as to why they found the objectives difficult to understand:

- objectives should provide a clearer link between Local Flood Risk Management Strategies (LFRMS) and the national FCRM strategy
- the objectives are not clear and are difficult to locate within the document
- there are numerous sets of objectives which need to be simplified

*“The objectives are too numerous and could easily be reduced in number to make them more specific.”*

Some consultees provided additional feedback on objectives as describes below:

- catchment based approach (CaBa) partnerships should be represented in the objectives
- insufficient consultation with other Risk Management Authorities (RMAs)

### Question 4 “Is the balance right between the ‘social’, ‘economic’ and ‘environmental’ objectives, as explained in the draft plan? (Yes/No) If not, what would you change and why?”

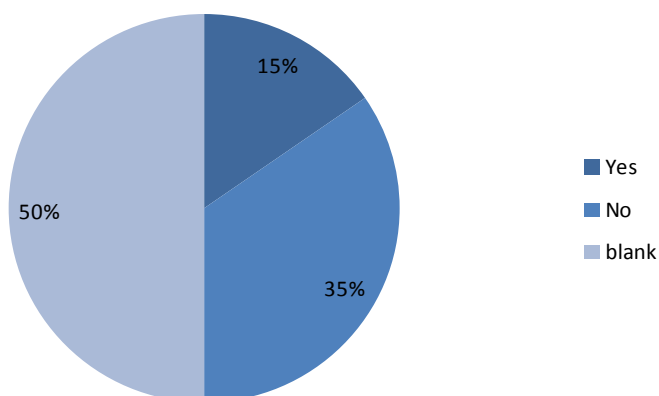


Figure 3 National responses to question 4

The majority of the responses to this question disagreed with the balance of ‘social’, ‘economic’ and ‘environmental’ objectives in the draft FRMPs.

Those who responded yes to this question came from a mixture of local and national government with one unspecified organisation. Those who answered no were predominately from environment management (NGO) with some leisure/tourism and Utilities.

Some of the key themes raised by those

answering no to this question are listed below:

Inconsistencies in how objectives are used and displayed in the various FRMPs make it difficult to assess whether the balance is right nationally. One consultee felt that some plans had struck a better balance than others.

*“We do not think that the objectives are expressed well in all Plans”*

A key theme in many responses was a lack of information about how the three categories of objectives (social, economic and environmental) are weighted and whether this is consistent nationally. Several consultees had opinions as to how the categories should be weighted:

The vast majority felt that social objectives should be given the highest weighting.

Some responders felt that economic and environmental objectives should be equally weighted and were currently under represented in the plan.

*“We agree that social should have the highest priority but consider that the environmental and economic objectives should be roughly equal”*

*“The draft FRMPs place disproportionate emphasis on protecting people and property, at the expense of protecting vital elements of the local and national economy”*

*“There are many more objectives listed under "social" and "economic" categories compared with "environmental".*

Some consultees suggested that the weighting of social objectives should be influenced by community vulnerability.

A number of responders expressed the opinion that there was little or no information on how objectives link to measures.

One responder felt that objectives could fall under more than one of the 3 categories and that priority should be given to those objectives that deliver multiple benefits.

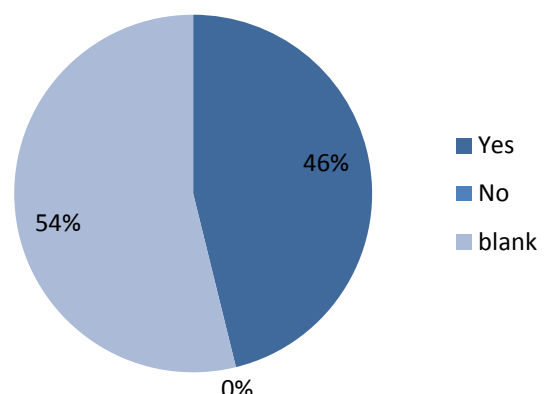
*“We believe that measures that benefit all three, economic, social and environmental objectives should be prioritised”*

## **Question 5 “Are there other flood risk management objectives that should be included? (Yes/No) If so, please explain what they are and why they should be included?”**

All of the responses to this question felt that there was a need for further objectives in the final FRMP.

A recurring theme was a need for more consistency in the objectives across the FRMPs with multiple consultees highlighting objectives in one or more plans that they felt should be included in all. A summary is included below:

- ensuring that flood risk management does not negatively impact, and where possible enhances, recreation and tourism
- reduction of economic damage and maintaining existing assets that protect businesses.
- many plans have objectives focusing on designated sites and Water Framework Directive (WFD) which should be expanded to include biodiversity



**Figure 4 National responses to question 5**

*“We encourage all other regions to include objectives that embrace the importance of biodiversity”*

*“We believe that this is an important objective that should be included in the other FRMPs”*

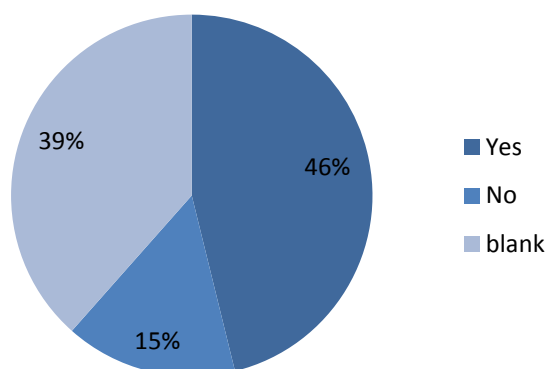
Further objectives suggested by consultees are summarised below:

- government to incentivise and support changing land management practices to slow the flow of surface water runoff and reduce peaks in flow
- recognising the impact of flood risk management on agricultural land and food security
- encourage a more holistic approach to flood risk management, encouraging the delivery of multiple benefits
- consultation of local and national stakeholders where flood risk management has the potential to negatively impact the environment (such as dredging)
- consideration of mine water pollution treatment should be included in flood alleviation schemes
- working with Catchment partnerships should be explicitly identified as an objective
- the importance of riparian landowner maintenance. Recognising that land owners, communities and businesses have a role to play managing flood risk
- assess the vulnerability of communities and target interventions in areas with high numbers of ‘vulnerable’ people

Some respondents used this question to highlight other issues with the objectives. One felt that the objectives needed greater integration with objectives in Local Flood Risk Management Strategies (LFRMS) and the national FCRM strategy. Another felt that specific objectives should be tailored to different catchment scales (property, community, catchment).

*“The FRMPs should provide the link between local strategies and national FCRM strategy”.*

### **Question 6 “Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan?”**



**Figure 5 National responses to question 6**

Approximately half of the responders understood the difference between on-going, agreed and proposed measures. Those who answered yes to this question came from a mixture of environment management (including NGOs), local and national government, utilities and leisure and tourism organisations.

One of the responses stated that whilst they understood the difference between the different types of measures they felt that the potential interactions between the types of measure required greater consideration.

*“We believe that the potential interactions between these measures should also be considered”*

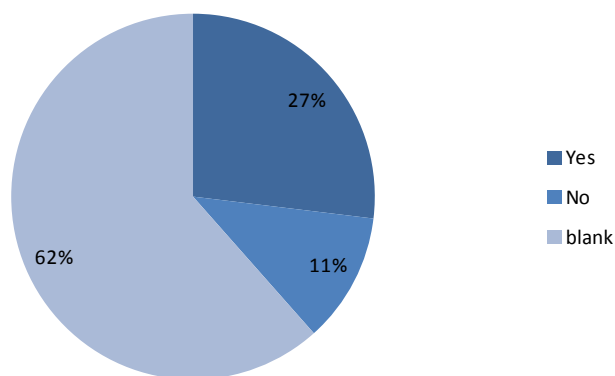
Those who answered no to this question provided the following explanations as to why the differentiation of measures was difficult to understand:

- FRMPs as a whole are overly complex. Splitting the measures into the three categories was seen to be overly complicated making it difficult for local users and communities to understand
- the diagrams used to explain the categories of measures are difficult to understand
- locally delivered measures are often not included in the plans, particularly those measures not listed in existing plans and strategies
- unclear whether communities will have the opportunity to review and comment on measures to inform whether they are still a priorities.

**Question 7 “Across all proposed, agreed and ongoing measures, the plan describes ‘prevention’, ‘preparation’, ‘protection’ and ‘recover and review’ approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**

The majority of respondents did not directly answer this question, however some did provide additional comments. 27 % of responders felt that the balance of measures was correct in the draft plans. The majority of those who answered yes came from environment management (including NGOs).

Some consultees reiterated some of the points raised in question five that, the approach to measures in the FRMP is too complex with too much of an emphasis on quantifying measures and creating an inventory of actions. They felt that this shifts the focus of FRMPs away from practical management. Additionally, merely comparing the number of measures in each category gives no indication of the scope and scale of individual actions.



**Figure 6 National responses to question 7**

*“If quantification is required to meet EU Directive requirements this should be done separately from setting out how local risk management authorities and their partners will work together to manage flood risk”*

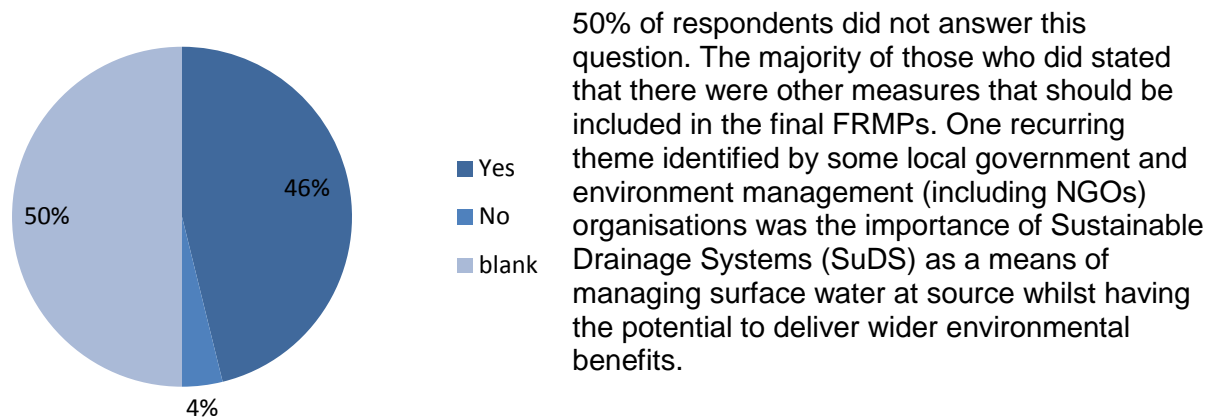
One consultee stated that the terminology used to describe measures in the draft FRMPs is not consistent with that used in previous plans and strategies (including Shoreline Management Plans and Catchment Flood Management Plans) creating a lack of consistency.

Some responders felt that there needs to be higher prioritisation of prevention and recovery and review measures in the plans. It was felt that these types of measures were under represented in the plans, which were seen as focusing on short term measures.

*“We believe there should be higher prioritisation of prevention measures and more prevention measures proposed. Although there is a place for short term actions such as dredging we believe there is an over emphasis on such measures.”*

*“FRMPs must ensure that recovery and review is sufficiently strong”*

**Question 8 : “Are there other proposed measures that should be included? (Yes/No) – If yes, please explain what they are and why they should be included.”**



**Figure 7 National responses to question 8**

*“The draft FRMPs do not take adequate account of surface water management and the use of SuDS and water management measures to manage surface water at source”*

*“A key measure is to deliver multi-functional SuDS that reduce flood risk but also deliver WFD objectives”*

One responder suggested that whilst current flood risk mapping provides useful information on present day flood risk there is a need to predict the future impacts of flooding. They highlighted that this could create a tool which could be used to help planners try to quantify the future changes to flood risk.

*“suggest considering as a further measure whether the flood risk could be illustrated for some future periods (e.g. +5 years, +10 years)”*

Another responder suggested the need to ensure that communities are resilient through working with communities to make sure that they understand their flood risk and are engaged.

*“We believe that building community resilience is key to addressing flood risk. The plan needs to reflect this”*

Other proposals for measures included:

- reference to marine plans and the marine policy statement should be made in relevant FRMPs
- more emphasis on ongoing maintenance. Plans disproportionately biased toward capital protection schemes rather than maintenance
- more emphasis on the role of development control to minimise inappropriate development
- recognition of the risk of flooding from mine water
- modelling and monitoring of coastal erosion

## Question 9 “How can you support the work set out in the draft Flood Risk Management Plan to reduce flood risk?”

Those who responded to this question suggested a variety of ways they could support the draft plan. Most were keen to continue to get more involved in flood risk management. The main theme was partnership working across all interested parties to reduce flood risk, and sharing data and knowledge. A selection of quotes are shown below:

*“We would be happy to provide expertise on wetland creation and natural flood management measures. We would also like to work with farmers to create demonstration sites of how re-establishing floodplain function can improve farm management through allowing specific areas to flood and using more appropriate crops/grazing techniques.”*

*“We would welcome the opportunity to explore whether there is any opportunity for additional funding/partnership approach”*

*“too often in discussions at catchment level, the voice of the amenity sector is not sought or heard”*

*“facilitate access to best current knowledge and practice for managing flood risk whilst also generating ecological (and associated societal) gains”*

*“If a catchment based approach to flood risk management is adopted the Catchment Partnership can help identify AND DELIVER the flood risk solutions.”*

*“The dissemination of information about flood risks, flood management and property protection to members. This would be achieved via e-news and publications and a range of different forms of advice.”*

## Question 10: “Are there things you think should be done to improve co-ordination of river basin and flood risk management planning?”

There was general agreement amongst consultees that the two plans must be linked. Responses to the FRMP consultation suggest the following improvements for co-ordination of river basin and flood risk management planning:

**Table 3 Quotes summarising feedback on FRMP and RBMP co-ordination**

<i>“Flood and coastal risk management and water quality must be explicitly brought together, by merging River Basin Management Plans (RBMPs) with Flood Risk Management Plans (FRMPs) and Shoreline Management Plans (SMPs)”</i>	
<i>“Plans should be integrated together into one to deliver a true management plan for a river basin so that stakeholders can be clear on what is proposed in their local area.”</i>	<i>“Engagement with all RMAs to develop a joint plan / approach rather than the way these documents have been produced”</i>
<i>Good leadership throughout flood risk and catchment management is needed to ensure that the two approaches are brought together”</i>	



## Additional National feedback

Some comments fell outside of the structured questions but were perceived as important feedback that should be considered when making changes to the final plan.

Multiple responders expressed general satisfaction with the FRMP process and the plans themselves.

*“We support in general the concept of the FRMPs as a strategic framework”*

*“The FRMPs provide an impressive level of technical and management detail”*

There was an underlying concern that the plans were too high level, with insufficient information about individual measures or actions. Several responders felt that this made it difficult to assess the actions in the plans at a local level.

*“there are concerns that the level of detail provided is limited and too broad in nature”*

Another common theme expressed by consultees was the length of the plans and accessibility of the information. The majority of people felt that the plans are too long making it difficult to locate the information relevant to them. One consultee went on to suggest that the plans would benefit from a summary document which would help emphasise the key messages for each RBD.

*“for more general consumption they would in our view benefit from a simple one or two page preface”*

Another concern raised was the lack of alignment with the FCRM 6 year programme and local flood risk management strategies. Some consultees felt that greater explanation as to how FRMPs will work alongside existing plans and strategies.

*“Finally, it is not clear how the draft plans relate to the Government’s six-year capital investment programme announced in December 2014. It is essential that the final flood risk management plans are in close alignment with this.”*

Other issues raised include:

- flood risk management actions should aim to deliver multiple benefits where possible
- the future of Catchment Flood Management Plans (CFMPs) need to be carefully considered
- better definition of cultural heritage is needed, the plans currently focus on selected designated sites
- reference to marine planning should be made in every FRMP
- FRMPs should reference the latest Met office climate predictions to plan for the changing climate

## **Consulting at a national level**

A wide range of communications and engagement activity was carried out at a national level to support the FRMP consultations and exchange ideas. This section provides some examples of these activities.

### **Workshops**

A number of workshops were held before and during the consultation period, with organisations from a range of sectors, to discuss the consultations.

Examples of workshops held:

- Modified waters workshop (also covering river basin management plans), October 2014
- NLPE (also covering river basin management plans), October 2014
- estuaries and coasts sub-group (also covering river basin management plans), November 2014
- water Industry sector workshop , January 2015
- rural land management sector workshop, January 2015

### **Meetings, seminars and conferences**

The consultation was on the agenda at a number of national meetings and events. For example:

- England Fisheries Group meeting, November 2014
- Catchment Based Approach national support group, February 2015
- International Navigation Association seminar, January 2015
- Strategic Water Quality and Waste Planning Group, March 2015
- Local Government Flood Forum, March 2015
- Regional Flood and Coastal Committee chairs, May, December 2014 and February 2015
- Local Authority Flood Risk Management Capacity Building Programme, January 2015
- Local Government Association coastal special interest group, December 2014

### **Social Media**

The consultation was promoted through social media with a series of tweets at the launch, mid and end of the consultation period. An email was also sent out at the launch, during the middle and at the end of consultation to stakeholders to encourage them to respond to the consultations.

### **Newsletters and websites**

The consultations were mentioned in various newsletters including the National Flood forum and a newsletter for Regional Flood and Coastal Committees (RFCCs).

Table 4 summarises the types of engagement carried out to promote FRMP consultation.

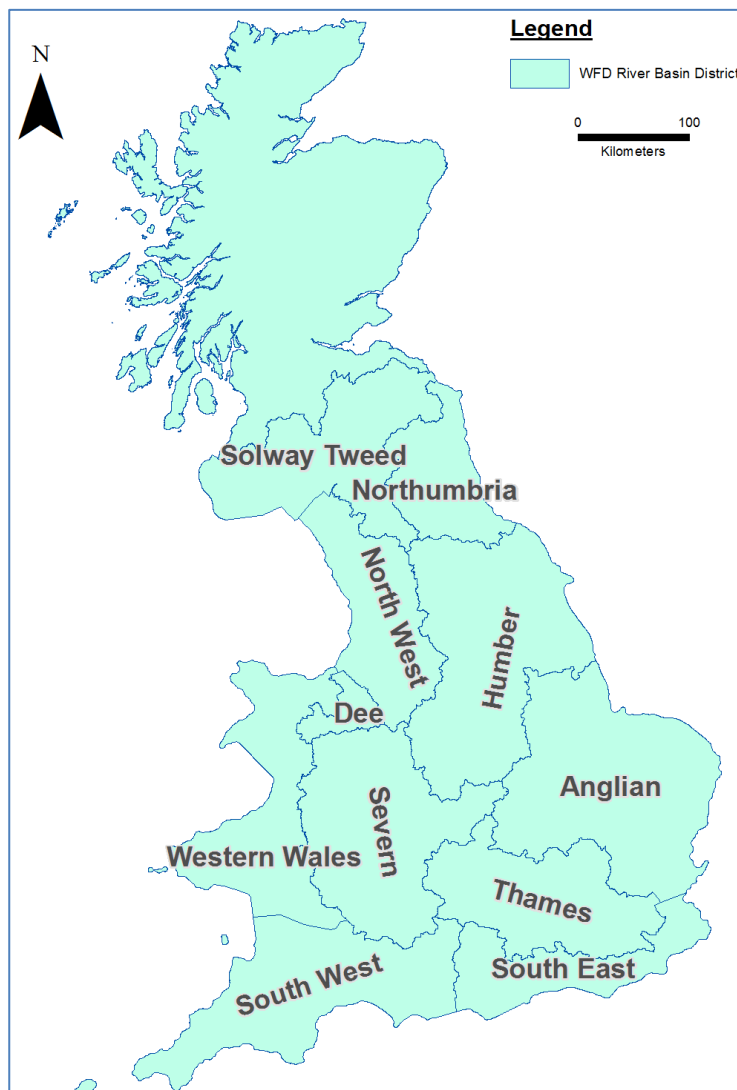
**Table 4 High level summary of national engagement.**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	17	Water UK Sewerage Infrastructure Network Group, Local Authority Flood Risk Management Capacity Building Programme, NLPE, England Fisheries Group meeting, Water UK Strategic Steering Group, Forestry Commission, English Heritage, Local Government Association coastal special interest group, Regional Flood and Coastal Committee Chairs, National Catchment Based Approach Group, Local Government Flood Forum, Strategic Water Quality and Waste Planning Group.
<b>Emails</b>	Multiple	All national stakeholders, Water Industry sector workshop ,Rural Land Management sector
<b>Social Media</b>	n/a	Multi-sector
<b>Workshop/ seminar</b>	6	The International Navigation Association, Modified waters stakeholders, Estuaries and coasts sub-group, Water Industry sector workshop, Rural land management sector workshop
<b>Newsletter</b>	1	Multi-sector
<b>Other (including phone calls)</b>	3	Conference Flood Defence Expo, FRMP Cross Border Advisory Group (CBAG) meetings, Highways Agency

# 3. River Basin District feedback

This section provides information for each river basin district (RBD). It summarises the main themes arising for each consultation question; the engagement carried out and the numbers of responses received by the following river basin districts (RBDs):

- ▶ [Anglian River Basin District](#)
- ▶ [Dee River Basin District \(English section\)](#)
- ▶ [Humber River Basin District](#)
- ▶ [North West River Basin District](#)
- ▶ [Northumbria River Basin District](#)
- ▶ [Severn River Basin District \(English section\)](#)
- ▶ [Solway Tweed River Basin District \(English section\)](#)
- ▶ [South East River Basin District](#)
- ▶ [South West River Basin District](#)
- ▶ [Thames River Basin District](#)



### 3.1. Anglian River Basin District

The Anglian River Basin District covers 27,890 km<sup>2</sup> from Lincolnshire in the north to Essex in the south, and Northamptonshire in the west to the East Anglian coast. The river basin district comprises eleven 'management' catchments. These catchments flow from the high chalk and limestone hills through very low lying fenland areas, before finally reaching the sea. The area is mainly rural, but some key population centres are located where there is a high risk of flooding.

46 river basin specific responses were received with the majority of responses (52%) came from local government, followed by environmental non-governmental organisations (18%), and other organisations (11%). Other government bodies made up 11% of the responders, while the remaining responses came from water companies, the private sector, and individuals. Only one response came from the transport and leisure sector. Within these responses, Internal Drainage Boards made up 13% of the responses.

Much of the focus was around the measures and objectives and the future expectations of the plan. Two clear points raised by many responders were:

- the plan felt too high level and complex; responders queried whether its purpose really is to be a multi source flood risk plan
- the measures lacked local relevance, and it was unclear which organisations were leading on these

Other points of interest raised included that the plan:

- did not emphasise the importance of maintenance in reducing flood risk to both people and property
- did not highlight the need to achieve a greater balance between capital and revenue spending
- needed to focus more on the economic effect flooding has on local communities in terms of its effects on agricultural production and tourism, two of the main industries in the river basin district
- did not include coastal and tidal flood risk, and coastal erosion
- should promote partnership working in order to achieve the objectives of the FRMP
- should aspire to and where possible, achieve multiple benefits from flood risk projects, and to highlight in the tables where such benefits will be met

The general feedback was that the questions asked were too rigid and it was difficult to navigate through e-consultation system. However the workshops and local meetings provided a good platform for people to ask questions regarding the FRMP consultation process.

The word diagram below illustrates some of the key themes that were raised in the responses.



Feedback received came from the following groups:

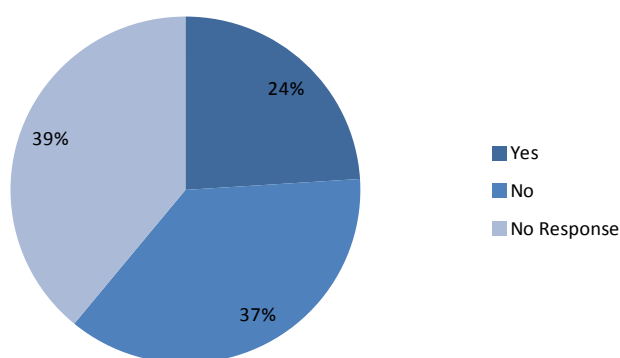
**Table 5 Breakdown of responses by organisation type Anglian RBD**

Organisation type	%	Number of responses
Individual	10.87	5
Business and commerce	2.17	1
Environment management (including NGOs)	17.39	8
Farming/land management	2.17	1
Government, local	52.17	24
Leisure / tourism	2.17	1
Utilities	2.17	1
Other	10.87	5
<b>Total</b>		<b>46</b>

## Summary of consultation feedback

The following pages summarise for each question the general themes emerging from the consultation and highlights areas that are being taken into consideration for the final FRMP.

### Question 1: “Do you agree that this draft plan sets out the most significant flood risk issues for your area? If not, please explain what you think is missing.”



24% of responders agreed that the draft plan sets out the most significant flood risk, however, it should be noted that the majority of those who said ‘yes’ are from the local government sector followed by the environment management (including NGOs) sector.

Overall, the responders agreed that while some of the main flood risk issues were set out in the plan, the document could not be described as taking into account all sources of flooding.

Figure 8 Anglian responses to question 1

Amongst those responders who felt that the plan did not cover all of the significant flood risk issues, the common themes which they felt were missing included:

- sources of flooding other than main river, the sea and reservoir
- maintenance of assets and watercourses
- Local Flood Risk Management Strategies (LFRMs)
- catchment management
- loss of life and the wider economic impact of flooding on the region.

It was felt that to gain a true reflection of significant flood risk, the document should include the risk of groundwater, surface water and ordinary watercourse flooding, and the impact of coastal erosion on local communities.

Several responders highlighted the fact that as the document does not adequately represent all sources of flood risk within the catchment, one of the primary purposes of the plan – to target investment – cannot be achieved in its present format.

Internal Drainage Boards and landowners felt that more emphasis should be put on the role that maintenance, or lack thereof, plays on flood risk in the catchment, particularly in the low-lying Fenland areas:

*“Maintenance of drainage infrastructure is essential for the natural and built environments to prosper. The development of houses and employment ... will be at significant risk of flooding without the maintenance of the whole system, including the SuDS, sewers, watercourses and rivers.”*

Local issues were highlighted as being largely absent from the plan. While the FRMP’s focus is a high level overview of flood risk within the catchment, many responders felt that local flood risk issues stated within the Local Flood Risk Management Strategies also need to be included to provide a more balanced picture of flood risk, and allow decisions to be made on a local as well as catchment scale:

*“Significance is relative and what is most significant at a local level might not be picked up at a RBD or catchment scale.”* (Source: local government)

However, one responder suggested that it may be useful to include the following in order to highlight local issues:

*“A priority list of significant areas for each catchment would be useful to enable effective planning by the Risk Management Authorities and encourage partnership working.”*

## **Question 2: "What do you consider to be the highest priorities for managing the risk of flooding in your area?"**

One of the main priorities identified by Internal Drainage Boards is ensuring continuous maintenance to ensure efficient conveyance of water during high flow events. The emphasis recently has been providing money for new, capital projects. However, the responders agree that there is a need to maintain a balance between capital investment and ongoing maintenance of existing structures and the watercourse itself, in order to effectively reduce flood risk.

Another high priority theme which emerged from the responses was working in partnership across all organisations involved with managing flood risk and that these partnerships should involve local communities. This would allow for the sharing of data and a greater understanding of roles and responsibilities. Communities would become better prepared and more resilient to the impact of flooding.

Other significant topics highlighted include:

- the need to understand the interactions between surface water and other sources of flood risk
- reducing flood risk by working with natural processes
- adopting a sustainable approach to water management to create opportunities on a catchment scale
- learning lessons from previous flooding events to inform policy and practices

*“...the number of properties at risk from surface water flooding exceeds Sea and river flooding by 20%.”*

*“Take a collective, proactive and innovative approach to manage flood risk to pool resources and funds in an integrated way to achieve enhanced overall benefit.”*

*“Take a sustainable, holistic approach to flood risk management to deliver wider environmental benefits, sustainable communities and best use of local water resources.”*

Two main priorities that were identified in several of the consultation responses were: avoiding risk and loss of life; and, the impact that flooding has on the local economy. Other priorities which were considered by various organisations are summarised below:

- long term management of flood risk from all sources
- tidal flooding / coastal flooding
- flood risk to agricultural land
- food security
- community resilience
- urbanisation and development
- preventing inappropriate development
- Sustainable Urban Drainage (SUDs)
- conservation and enhancement of the historic environment
- local decision making
- agricultural land and production
- multi-benefits from flood risk management schemes
- adaptation to climate change



### Question 3: "Do you understand the objectives as described in the draft plan? If not, what would help you understand them better?"

Over half (59%) of responders agreed that they understood the objectives for managing the risk of flooding. These responses came from a variety of sectors including local government, RMAs, environment management (including NGOs) and individuals.

For those organisations / individuals who said they didn't understand the objectives, the main reasons given were:

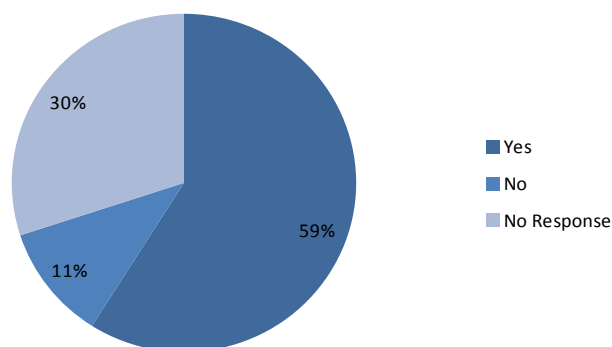


Figure 9 Anglian responses to question 3

- the objectives were ambiguous in some case
- they were incomplete due to lack of consultation with some RMAs
- they were too numerous to provide value
- it is unclear how the objectives complement each other.

It was felt that:

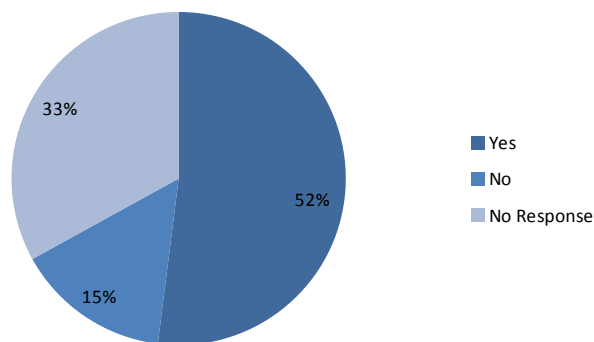
- there was a lack of objectives around reducing economic damage, from all sources of flooding in terms of the effects on tourism, non-residential properties and agriculture - particularly relevant to the weighting given to agricultural land
- it was unclear on what was meant by the adaptation to coastal erosion objective
- it was unclear how the objectives support and are consistent with the local strategies, particularly as not all local strategy objectives were incorporated into the FRMP

*"We believe the objective on agricultural land values should be expressed in stronger terms: the value of agricultural land should be given a higher weighting within the economic appraisal of options."*

*"It should be clearer what is meant by giving communities and landowners time to adapt to coastal erosion. A policy plan doesn't guarantee the funding to deliver this."*

An NGO suggested that it would be useful to include a column in the tables which shows the multi-benefits which a project may deliver, for example, WFD improvements. This would provide an improved link to the RBMP document.

**Question 4: "Is the balance right between the 'social', 'economic' and 'environmental' objectives, as explained in the draft plan? If not, what would you change and why?"**



**Figure 10 Anglian responses to question 4**

Across the responses received, the majority of respondents (52%) said that the right balance between 'social', 'economic' and 'environmental' objectives had been achieved. The majority of those that agreed with the balance were from the local government sector. It should be noted that the Environment Management (including NGOs) and individuals that responded to the consultation didn't answer this question.

Those responders who said that the objectives were not balanced (15%) highlighted that the balance was difficult to quantify and that a number of important issues had not been fully recognised.

*"They [objectives] do not appear to be explained in any great detail....it may be useful for an 'informed' reader to understand more about how each objective is to be measured and met"*

Of those responders who felt that the objectives were not balanced, common themes that they felt were missing / inadequately represented included:

- economic benefits and damages
- food security
- working with RMAs
- coastal erosion
- non-statutory wildlife sites

The following themes were highlighted by responders:

- greater weight should be given to economic benefits and damages and the importance of food security, given the increase in the severity of weather events
- objectives should be considered holistically to deliver sustainable flood risk management

*"The balance remains heavily weighted towards property with too little consideration given to economic damage. While risk to life has to be accorded the highest priority, the importance of food production and processing as a component of food security requires a higher level of recognition"*

*"Objectives should be multi-beneficial with regards to delivering combined social, economic and environmental benefits wherever possible"*

## Question 5: "Are there other flood risk management objectives that should be included? If so, please explain what they are and why they should be included"

A number (46%) of Anglian FRMP responders felt that additional flood risk management objectives needed to be included. This was agreed across all the sectors but the individuals and some of the Environment Management sector chose not to answer or said no.

An objective that was repeated by nine responders, who felt it should be included, was to do with working with natural processes. The quote below is representative of the views expressed on this theme:

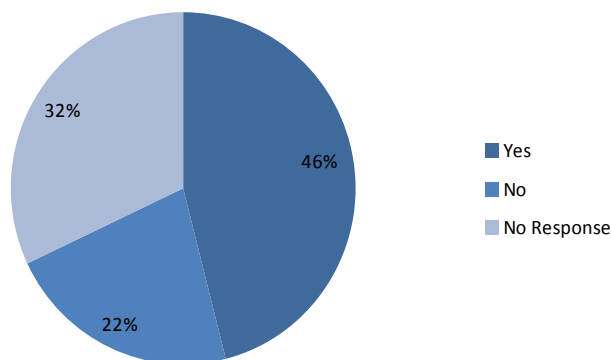


Figure 11 Anglian responses to question 5

*"We feel there is great potential for land use change and management, including the creation of floodplain woodland and the planting of hedges and buffer strips on farms, to reduce flood risk in this River Basin District."*

Some responders, particularly coastal local authorities, felt that coastal erosion was not fully covered by the objectives. It was also felt by some local authorities that the objectives could be used more effectively to link with the local flood risk management plans.

One responder made the point that environmental quality underpins the health of the economy and society, so separating objectives into social, economic and environmental objectives is too simplistic. The strongest themes for additional objectives can be summarised as follows:

- coastal erosion mitigation and adaptation
- preventing risk to life/loss of life
- recognition of the value of agricultural land to the economy
- a robust maintenance programme
- linking to local Flood Risk Management Strategies
- making space for water
- working with natural processes to achieve sustainable flood risk management
- climate change resilience
- increasing recreational opportunities through FCRM activities

There were many other individual suggestions for additional objectives, 27 in total. The consultation response document to be published in December, will attempt to address each one of these accordingly.

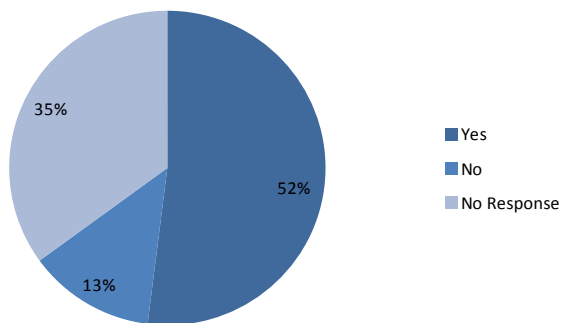
*"The FRMP should set an objective to ensure a Robust Revenue Maintenance Programme Exists. We welcome investment in a revenue maintenance programme. This is critical if we are to maintain our existing flood defences and drainage infrastructure. For too long the needs of farmers have been a low priority and agricultural businesses have suffered from a lack of adequate watercourse maintenance."*

This view was repeated by another two responders.

Expanding the objective of 'Reduce risk to people' to include preventing loss of life or reducing risk to life was also felt to be important by three responders. One said:

*"Reduce risk to people – should include "avoid loss of life" since this is a high priority for the Government."*

**Question 6: "Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan? If not, what would help you understand them better?"**



**Figure 12 Anglian responses to question 6**

Over half (52%) said they understood the difference between on-going, agreed and proposed measures. That is the overall majority of those that responded (80%). This was across all the sectors, however, it should be noted that 35% chose not to answer the question. The general comments received suggested that the categories were misleading and the expectation that agreed measure will be progressed needs to be managed. It was suggested that it needs to be clear that the delivery of the measures is subject to funding allocations and project approval. Some of the measures are aspirational;

what we and others would like to do to manage risk, and include a level of uncertainty.

It was suggested that:

*“there is an implication that agreement confers agreed funding and this is not explicit, needs clarifying”*

*“for clarity, it would be helpful to say (at the bottom of page 20) that agreed measures are also subject to other approvals/permissions/gateways, such as project appraisal.”*

Other key issues that were raised more than once were:

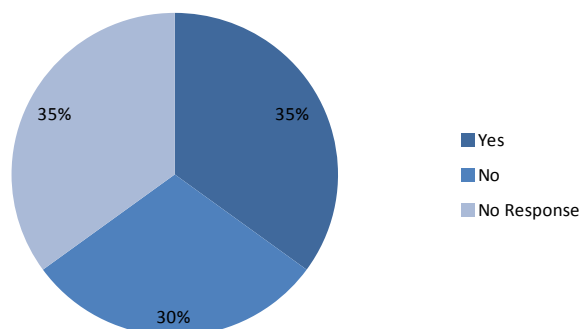
- it was not clear how the types of measures have been assigned, prioritised and ultimately how they will be monitored and reported on
- further explanation is needed around the assessment process and how measures will progress through the categories for example from ‘proposed’ to ‘agreed’
- additional terms postponed or cancelled are included as categories of measure taken from the Shoreline Management Plans. An explanation regarding these measures is required
- local measures being delivered to manage flood risk which are not in strategic plans, for example, a project being delivered following the tidal surge in December 2013

The summary maps and pie chart diagrams were seen as confusing and difficult to read:

*“The analysis measures the measurable but not what is important, [the] risk being reduced!”*

**Question 7: “Across all proposed, agreed and ongoing measures, the plan describes ‘prevention’, ‘preparation’, ‘protection’ and ‘recover and review’ approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**

Overall the split of responses was even. Of those that answered this question, just over half (53%) agreed that the balance within the plan for the different types of approaches was correct. However it was the local government and individuals that responded who said the balance was right with utilities, Environment Management and others disagreeing with the approach.



Comments provided to address the imbalance included:

**Figure 13 Anglian responses to question 7**

- capital investment programmes should be included
- there is a need for more prevention and recovery and review
- recovery measures should be more proactive and planned rather than reactive to a flood event
- clarity on the inclusion of adaptation measures and where they are included
- environmental actions are not represented or reflected in recovery and review prevention, protection and preparedness types of measures

Again it was highlighted that as the greatest number of people and property are at risk from surface water flooding and the greatest risk is posed from sea flooding, the balance of the measures should reflect this.

There were a number of comments suggesting changes to specific measures and locations.

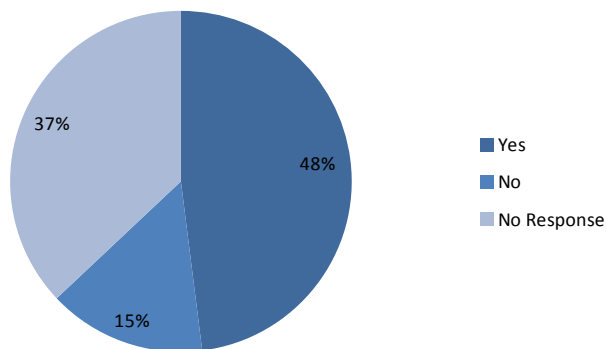
There were comments that the summary maps with the charts showing the spread of measures were confusing, difficult to interpret and not representative of the risk being managed.

*“Range of measures vary from high level strategic/ aspirational to very local specific ones, comparing on the basis of numbers of actions in each category is both pointless and impossible”*

*“The division into 4 types of measures is overly complex, and also risks seriously misrepresenting the scope and range of flood risk management activities undertaken within each catchment and river basin. The graphic representation to indicate '0' actions of a certain type risks sending a highly skewed and misleading public message”*

*“the balance of the value and outcomes of 3ps and R&R are not explored or justified. So difficult to see if balance is right. I.e. would more in prevention lessen the need for protect”*

**Question 8: “Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included”**



**Figure 14 Anglian responses to question 8**

Of the responders who answered the question, the majority (73%) said that there are other proposed measures that should be included. However, utilities had no additional measures to add. It should be noted that leisure and tourism, farming and land management responders didn't answer the question. There were 9 comments about location specific measures in addition to more general comments about the types of measures to be included.

These comments can be grouped into the following themes:

- adaptation measures and clarity of where they fit in the plan
- inclusion of maintenance measures
- measure of a holistic approach across the catchment
- more effective plans of response and recovery, ahead of events, to enable a more coordinated, joined up approach
- flood investigation measures
- managing flood risk to caravan parks
- improvement of land management techniques to manage and reduce flood risk

Reoccurring themes that were raised a number of times included:

- partnership working, reinstatement of flood plain and flood storage measures
- strengthening of planning advice and SuDS and their ongoing maintenance
- inclusion of local initiatives and measures not just those from existing strategic plans

*“landowners, communities and business at risk have a strong role to play in taking actions to minimise flood risk as well as community emergency response”*

*“Management of online and off line storage/attenuation areas to reduce flood risk (flood risk priority).”*

*“Deliver multi-functional SuDs that reduce flood risk but also deliver WFD objectives. Also a proper mechanism for adoption of SuDs and a mechanism for the ongoing maintenance of them”*

*“Need to add numerous local initiatives / actions [measures] for a full picture [of flood risk management]”*

## Question 9: “How can you support the work set out in the draft flood risk management plan to reduce flood risk?”

The response to this question highlighted many different ways in which responders felt they could support the work set out in the draft Anglian FRMP. The main theme was working in partnership across all interested parties to reduce flood risk,

*“[We] have significant land ownership .... and are seeking to work in partnership to deliver multi-objectives for healthy land and water management.”*

*“The FC has been working closely with EA nationally to develop the evidence base for the role of woodland in reducing flood risk (Woodland for Water report, 2011)*

*“...we have both a flood and a coastal partnership, comprising all risk management authorities, community groups and other relevant organisations. We work together with our communities to deliver FCERM ... in the best possible way and will continue to take this approach. A properly written and inclusive FRMP will be a valuable guide to us.”*

*“The works set out in the draft plan can be supported by IDBs as they undertake a comprehensive maintenance programme year on year and when needed improvements to their drainage infrastructure and pumping stations.”*

Other ideas put forward on how responders were able to support this work included:

- a borough council committee to collect evidence for surface water flooding
- local planning authorities working with others to manage and reduce flood risk by determining planning decisions
- involvement in flood boards/flood risk and drainage management groups/FRM partnerships
- coastal forums
- support with working with farmers and landowners to implement land management changes – Campaign for the Farmed Environment (CFE)
- to work together in the future to develop the FRMP further
- working together on nature partnership projects and NGO operated conservation sites
- work of the IDBs supports flood risk management activities
- through the Local Flood Risk Management Plans and work of the LLFA on surface water flooding
- NGOs as landowners can support land use change to reduce flood risk
- IDBs can support land owners and managers to maintain assets that are less critical to managing flood risk to people, and so unaffordable for the Environment Agency to continue to maintain.
- by providing advice on the significance of heritage assets that may be affected
- coastal RMAs\ – continuously seeking ways forward to manage the risk to communities, environment, business and infrastructure of coastal erosion.

**Question 10: “Are there things you think should be done to improve coordination of river basin and flood risk management planning?”**

In response to this question there was agreement that there needs to be better coordination between the Anglian FRMP and RBMP. Quotes taken from the responses have been used to summarise this below.

**Table 6 Quotes summarising feedback on FRMP and RBMP co-ordination**

<p><i>“By bringing the CFMPs, RBMPs and FRMPs into one document in the future would be the most practical solution to avoid duplicating reporting and enabling dual benefits to both the environment and through the reduction of flood risk.” “A catchment based approach may be more practicable than attempting detailed co-ordination across geographical areas as wide as river basins, because no other organisation is able to consider flood risk at this scale.”</i></p>	
<p><i>“Flooding is inextricably linked to water quality, point source and diffuse pollution, so these factors should be considered in the FRMP</i></p>	<p><i>“The Plans need to be inclusive and coordinated with RMAs. At present they are not.”</i></p>
<p><i>“A Combined assessment of risk, leading to measures that provide protection from all sources, where practicable, in smaller catchments that are at a scale to be understandable and manageable by officers and local communities.”</i></p>	
<p><i>Clearer identification of the documents. Staggering consultation periods. Consider how the documents can be clearly set out. A master plan that consists of a strategy overview with annexes that contain details of each catchment area - easier to navigate to section containing relevant information.”</i></p>	



## Additional Feedback for the Anglian River Basin District

As well as responses to the questions set out above, we received a large number of additional comments on the FRMP. These included general comments in addition to comments on specific pages of the FRMPs or specific location. The information gathered from these comments is summarised in the table below:

**Table 7 Additional feedback for the Anglian River Basin District**

Further comments were received as follows:		
Comments made	Source	Theme
The document deals with main river, reservoirs and coastal flooding, but the forward and the measures tables include ordinary watercourses and other flood risks. It should be made clearer from the outset the purpose of the document as many actions undertaken by IDBs and other RMAs fall outside of this scope.	Other; Government, local	General comments about improvements to the text for clarification.
Key topics to consider include: <ul style="list-style-type: none"> <li>• Maintenance and revenue investment</li> <li>• Working with RMAs</li> <li>• Appropriate consideration of risk and consequence</li> <li>• Impact of sewage and surface water discharges</li> <li>• Valuing agricultural land</li> <li>• Role of IDBs</li> </ul> Effectiveness of consultation	Other	1. "What do you consider to be the highest priorities for managing the risk of flooding in your area?"
Improve linkages to other plans and documents. FRMPs should clearly state the relationships of all the various plans applying to FCERM (ref: Figure 1).	Other	General comments about improvements to the text for clarification.
Traditional hard engineered solutions should be avoided in favour of more natural and sustainable flood risk management solutions.	Government, local; Environment management (including NGOs)	8. "Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included"
The vulnerability of most heritage assets (designated and non-designated) to flooding, including occasional flooding and the potential harm to or loss of their significance.	Government, national	2. "What do you consider to be the highest priorities for managing the risk of flooding in your area?"
The potential impact of flood risk management measures on heritage assets and their settings, and including impacts on water-related or water-dependent heritage assets.	Government, national	2. "What do you consider to be the highest priorities for managing the risk of flooding in your area?"

Further comments were received as follows:

Comments made	Source	Theme
The 'high level' nature of FRMPs mean there is insufficient detail to understand nature or effects of individual measures. Also difficult to gain full understanding of the strategic approach to flood risk management.	Government, national	“Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included”
Key topics to consider include: <ul style="list-style-type: none"> <li>• Natural flood risk management</li> <li>• Opportunities for partnership working</li> <li>• WFD opportunities</li> <li>• On-going dialogue</li> </ul> Sharing of data	Government, national	General areas of interest in relation to the draft FRMP.

Below are some quotes from the comment received:

*“Why are watercourse, groundwater, and surface water categorised as ‘other sources’ of flood risk within this document. This gives the impression of them being an afterthought, or secondary form of risk?”*

*“Recognise productivity of region and importance of historically-modified lowland watercourses and water level management regime in its ability to store and manage water to facilitate not just agriculture but human settlement, business and infrastructure.”*

*“Little reflection of impermeability of built environment and its effect on flood risk. New developments have potential to impact flood risk elsewhere so important to value and maintain our existing drainage infrastructure.”*

*“High level description of soil is confusing and not useful. Well-managed soils and drainage infrastructure is critical in reducing flood risk and these should be recognised. Limitations of infiltration to attenuate flows is limited and this must also be recognised.”*

*“A catchment based approach may be more practicable than attempting detailed co-ordination across geographical areas as wide as river basins, because no other organisation is able to consider flood risk at this scale. However, a mechanism of local delivery would be advantageous, particularly where work is already being undertaken on the ground and the EA can input and widen the scope of existing projects to deliver benefits that would meet the objectives of the FRMP. By coordinating work through the local flood risk management strategies this could be achieved.”*

## Consulting in the Anglian River Basin District

Our approach to promote the consultation with our stakeholders locally was predominately via emails, meetings and joint workshops with RBMP colleagues. Staff involved in meetings with stakeholder groups and partners shared information across 14 meetings and 3 workshops to highlight and discuss the consultation.

The Environment Agency also promoted the consultation locally through:

- Periodic Strategic Partnership meetings between July 2014 - January 2015
- Leaflet drops to councils, universities and libraries in the area to capture other interested parties

**Table 8 High level summary of engagement Anglian RBD**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	24	Local government, Regional Flood Coastal Committee, individual, farming/land managem Essex County Council, Southend – on - Sea Borough Council, Cambridge County Council, Central Bedfordshire Council, Bedfordshire Borough Council, Milton Keynes Council, Bedfordshire Group of Internal Drainage Boards, Essex Flood Partnership, Essex County Council, Stour and Orwell Estuary Management Group, Essex County Council, Lincolnshire Wildlife Trust, Southend – on – sea Borough Council, Southend – on – sea Borough Council, Lincolnshire County Council, North East Lincolnshire Council, Lincolnshire Rivers Trust, Anglian Water, Welland Rivers Trust, Canal & Rivers Trust, Boston & District Angling Association, Grantham Angling Club, Norfolk County Council, Anglian Central Regional Flood & Coastal Committee, Lincolnshire Wildlife Trust, Central Bedfordshire Council, Natural England, Stour and Orwell Estuary Management Group, Natural England, Central Bedfordshire Council, Essex County Council, Norfolk County Council.
<b>Briefings</b>	2	Central Lincolnshire Drainage Group, Internal within the Environment Agency
<b>Email</b>	4	Lincolnshire County Council, North Lincolnshire Council, North East Lincolnshire Council, Anglian River Users Group, South Kesteven Drainage Group, Bedfordshire Borough Council, Central Bedfordshire Council, Cambridgeshire County Council, Milton Keynes Council.
<b>Workshop</b>	3	Norfolk Coast Partnership, Norfolk Rivers Trust, RSPB, Holme Hale Farms, Water Level Management Alliance, Broke Brothers' Farms, Cam Conservancy, Cam Valley Forum, Cam Rowers, Histon Parish Council, Farming & Wildlife Action Group East, Bury Water Meadows Group, National Farmers Union, English Heritage, Willingham Lode Internal Drainage Board, Countryside Recreation Trust, Witchford Parish Council, Swaffam Ecotech RBMP event.
<b>Leaflet drop</b>	1	University of Cambridge, Anglian Ruskin University, Libraries

## 3.2. Dee River Basin District

The Dee River Basin District (RBD) covers North East Wales with the eastern part of the RBD in England. The responsible authorities for flood risk management in England and in Wales (with regard to main rivers, the sea and reservoirs), are the Environment Agency and Natural Resources Wales respectively. This is a summary of the consultation responses for the English section of the Dee RBD. Natural Resources Wales has produced its own consultation response document which is available using the following link:

<http://naturalresources.wales/media/4408/dfrmp-consultation-response.pdf>

17 responses were received for the English part of the Dee RBD. Responses to The Flood Risk Management Plan (FRMP) consultation came from a diverse mix of sectors and groups, including environmental non-governmental organisations, local government, water industry and leisure/tourism groups.

The level of detail in the responses to the consultation questions varied greatly. The majority of responses were aimed at all RBDs rather than the Dee RBD explicitly, so there is little to draw out in terms of specific changes to the Dee FRMP content. Subsequently, it is difficult to accurately interpret some of the multiple choice questions, displayed in this section as pie charts.

Key themes that emerged from the consultation include the impacts of climate change, linking with other flood risk strategies and improving consistency of objectives within each FRMP and also across different RBD's.

The word diagram below illustrates some of the key themes and issues that were raised in the responses.



Feedback was received from the following groups

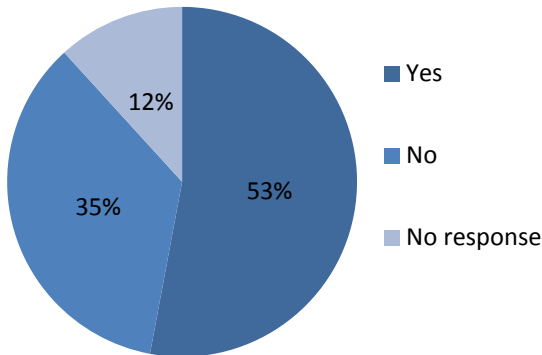
**Table 9 Breakdown of responses by organisation type Dee RBD**

Organisation type	%	Number of responses
Individual	5.9	1
Environment management (including NGO's)	5.9	1
Farming/land management	5.9	1
Leisure/Tourism	11.8	2
Utilities	17.7	3
Professional Members/Institutes	5.9	1
Government, local	5.9	1
Government, national	5.9	1
Other – Combined response from several organisations – public/private sector	5.9	1
Other – DEFRA Family	11.8	2
Other – developer	11.8	2
Other – Fisheries Interest Group	5.9	1
<b>Total</b>		<b>17</b>

## Summary of consultation feedback

The following pages summarise for each question the general themes emerging from the consultation and highlights areas that are being taken into consideration for the final FRMP.

### Question 1: “Do you agree that this draft plan sets out the most significant flood risk issues for your area? (Yes/No) If not, please explain what you think is missing.”



Approximately one third of consultation responses do not agree that the draft plan sets out the most significant flood risk issues. A number of comments were made regarding other issues that could be considered:

- the plans identify the most significant issues associated with flooding from the sea, rivers, surface water, reservoirs and groundwater. However, more consideration of sewer and water main issues would be beneficial

*“The discussion on the effects of climate change is not particularly focused”*

Figure 15 English Dee responses to question 1

• More information regarding flood risk on the English side of the Dee estuary and the historical flooding that has occurred there is needed.

*“Most significant flood risk issues could cover matters broader than the source of flooding. For example, funding of infrastructure and development pressures”*

- Discussion focuses largely on fluvial flooding and more emphasis could be given to surface water flooding and coastal flood risk.
- More emphasis could be given to infrastructure at risk of flooding.

### Question 2: “What do you consider to be the highest priorities for managing the risk of flooding in your area?”

Across the consultation comments, the highest priorities for managing flood risk are the protection of people, property and critical infrastructure. Other themes raised were as follows:

- natural flood management and integrated approaches to reducing flood risk
- sustainable options for managing flood risk, particularly in the context of climate change
- protection of power stations and electricity infrastructure assets
- the importance of taking a preventive approach to managing flood risk

*“The draft FRMPs are generally disproportionately focussed on capital flood defence schemes and do not give sufficient attention to the importance of maintenance of existing assets in managing flood risk.”*

### Question 3: “Do you understand the objectives as described in the draft plan? (Yes/No) If not, what would help you understand them better?”

The majority of consultation responses found the objectives to be clear. Where this was not the case, the following comments were made with regard to how understanding could be clarified:

- consultees would like to see consistency in the objectives throughout the plan

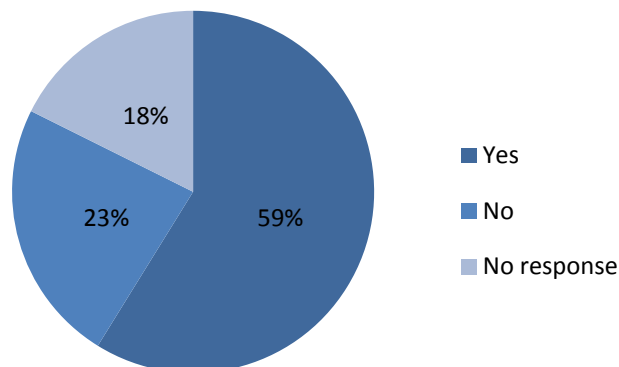


Figure 16 English Dee responses to question 3

*“The FRMPs should link together local strategies to provide a much clearer connection between local flood risk management strategies and the national FCRM strategy and provide the basis for partnership working”*

*“The contribution of each of the plan objectives towards social, economic and environmental goals is not explained... Evaluation of the contribution of plan objectives to social, economic and environmental objectives should be considered in an integrated way”*

*“Links between FRMP objectives and other Government policy objectives...should be identified to help broaden considerations and demonstrate a more integrated approach to achieving social, economic and environmental objectives”*

### Question 4: “Is the balance right between the social, economic and environmental objectives, as explained in the draft plan? If not, what would you change and why?”

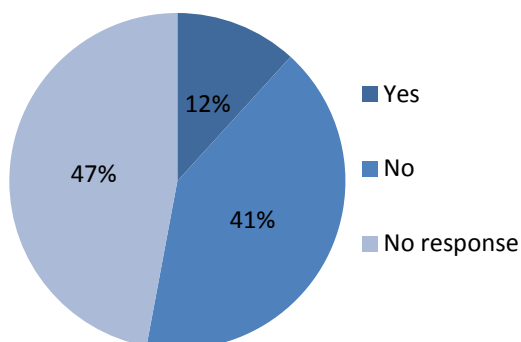


Figure 17 English Dee responses to question 4

Of the consultees who responded to this question, the majority did not find the balance between the social, economic and environmental objectives to be correct. Reasons given for this include:

*“We have not been able to identify any section within the plan that states what the balance is between the three objective areas of social, economic and environmental, it is also unclear how the balance has been applied. We believe it should be clearly stated if the plan gives one element a greater importance than others or if they are all of equal importance”*

*“The draft FRMPs place disproportionate emphasis on protecting people and property, at the expense of protecting vital elements of the local and national economy such as agricultural land and transport and energy assets”*

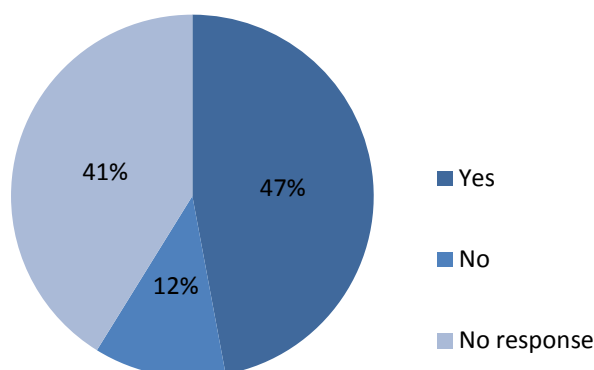
*“We agree that social [objectives] should have the highest priority but consider that the environmental and economic objectives should be roughly equal”*

- More consistency in the objectives across RBDs would help to clarify whether an appropriate balance has been achieved.
- Interpreting objectives across 10 FRMPs is hampered by the scale and size of the plans.

**Question 5: “Are there other flood risk management objectives that should be included? If so, please explain what they are and why they should be included?”**

Of the responses received for this question, a number of consultees made suggestions for additional objectives. These include:

- taking a catchment based approach to partnership working
- inclusion of recreation and tourism in objectives and measures
- identify farming practice that has the potential to be mutually beneficial to both flood risk management and agricultural industry



**Figure 18 English Dee responses to question 5**

*“Develop objectives that are specific to different scales of catchment”*

Some consultees raised concerns regarding how the FRMP links with other strategic documents and suggest that further work is needed to improve these linkages:

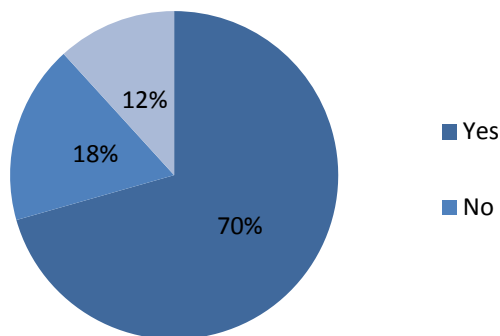
*“FRMPs operate at a much higher level than previous strategic flood plans... There is often insufficient detail to allow understanding of the nature or effects of individual measures/schemes [and] it is not always easy to gain a full understanding of the strategic approach to flood risk management, and its integration with other elements of environmental planning, at a catchment and sub-catchment scale”*

*“The FRMPs should be linked much more explicitly to local flood risk management strategies developed by local risk management authorities”*

Concerns were also raised regarding the future of CFMPs and the potential impact of phasing CFMPs out in favour of FRMPs:

*“Our view is that the demise of catchment-level plans may represent a risk that a body of important and detailed information will be lost from the public domain”*

**Question 6: “Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan?”**



**Figure 19 English Dee responses to question 6**

The majority of respondents had a clear understanding of how measures had been defined in the draft FRMP:

*“We believe the differences between the types of measures (on-going, agreed and proposed) are clearly stated within the plans”*

Where responses indicated that the difference between measures was not clear, the following comment was provided:

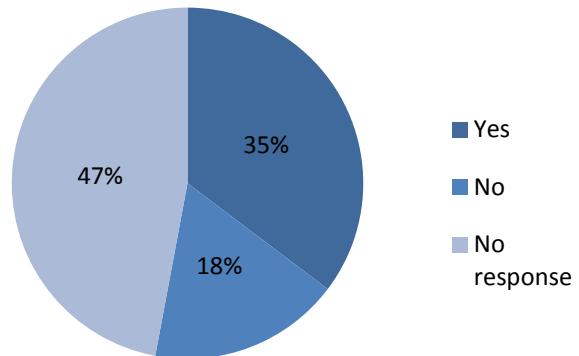
*“The draft FRMPs are overly complex. Although the plans contain explanations of the terms they use, this complex differentiation between measures, and focus on quantifying measures is confusing and makes the plans difficult for local users to understand and relate to or apply to their actions”*



**Question 7: Across all proposed, agreed and ongoing measures, the plan describes ‘prevention’, ‘preparation’, ‘protection’ and ‘recover and review’ approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**

The majority of consultees gave no response to this question. There were no suggested changes to existing Dee measures from the consultation comments. Responses to this question highlighted the omission of a measure for West Kirkby Flood Alleviation Scheme.

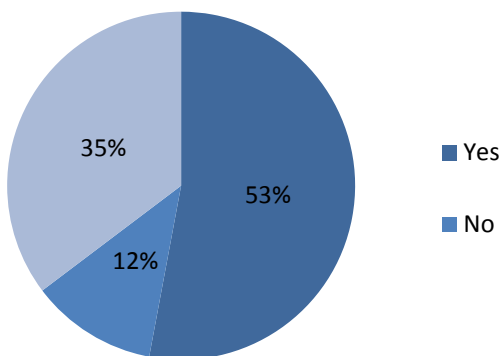
*“The different types of approaches to measures are clearly stated within the plans and the balance is clearly visible through the use of figures. We believe that the overall balance between Preventing, Preparing, Protecting or Recovery is appropriate”*



**Figure 20 English Dee responses to question 7**

One consultee felt the FRMP should not present an inventory of individual measures as it then risks missing some measures or giving disproportionate emphasis to some strategies or plans and not others.

**Question 8: “Are there other proposed measures that should be included? (Yes/No) If yes, please explain what they are and why they should be included.”**



**Figure 21 English Dee responses to question 8**

Most consultees thought other proposed measures should be included, however some of the subsequently proposed measures relate to other RBDs and so are not detailed here. A specific measure was proposed to have flood risk information quantified for a range of future periods to aid new development.

*“Initiate formal processes for daylighting / channel restoration / SUDs installation opportunities to be acknowledged, assessed and incorporated at the very earliest stages of any planning and development proposals put to local engagement”*

*“The inclusion of measures associated with assets that are not currently included such as sewers. We suggest that these should be included in future planning cycles”*

## Question 9 : “How can you support the work set out in the draft flood risk management plan to reduce flood risk?”

The following activities were highlighted from various consultees:

- continuing to engage in partnership working, communicating with partners and contributing to future planning cycles
- support the Environment Agency in the development of flood risk management techniques that rely on working with natural processes to achieve improved upstream flood storage and attenuated flood flows downstream
- provide contacts to share best practise and current knowledge.

## Question 10: “Are there things you think should be done to improve co-ordination of river basin and flood risk management planning?”

Suggested improvements to co-ordination work were:

- improved communications within and across existing groups
- local Authorities need to understand how WFD fits into their work
- integrated planning of measures within River Basin Districts which could aid resolution of conflicting objectives.

*‘We are willing to develop a coordinated approach. To this end we have already commenced work in our area to scope out how an integrated approach could be developed and what it may look like’*

## Consulting on the Dee River Basin District

Staff involved in meetings with stakeholder groups and partners shared information on the FRMP at their meetings and workshops during the consultation period. Examples include:

**Table 10 High level summary of engagement Dee RBD (English side)**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	9	Dee Liaison Panel; Weaver Goway Catchment Partnership, Merseyside Flood Risk Partnership, Cheshire and Mid Mersey Catchment; Merseyside and Greater Manchester Flood Risk Partnerships with Lead Local Flood Authorities and United UtilitiesPartnership, North West Regional Flood and Coastal Committee Members and Chair; North West Coastal Group, Country Landowners Association; Meres and Mosses Partnership.
<b>Workshop</b>	2	CLASP Workshop (local authority and public sector sustainability support service for NW focus on Climate Change), North West Regional Flood and Coastal Committee Workshop
<b>Email</b>	multiple	Lead local flood authorities, key stakeholders.

### 3.3. Humber River Basin District

The Humber River Basin District is one of the most diverse regions in England. It ranges from the upland areas of the Peak District, South Pennines and North York Moors with their internationally important peatlands, across the Derbyshire and Yorkshire Dales and the fertile river valleys of the Trent and Ouse, to the free-draining chalk of the Yorkshire and Lincolnshire Wolds.

43 responses were received for the Humber RBD. The majority of responses came from local government, followed by individuals. 13.9% came from environmental non-government organisations and 6.9% from utilities. There were no responses from the leisure / tourism or transport / navigation sectors.

There was a mixture of positive and negative responses towards the draft Humber FRMP. A lot of the focus was around the measures and objectives and what the future expectations of the plan are. A lot of people felt that it was too high level and complex and confusing as to whether or not it is a multi source flood risk plan. Many felt that the measures lacked local relevance and it was unclear which organisations were meant to be taking the measures forward. Another key issue that was felt to be lacking in the plan was the inclusion of coastal and tidal flood risk. A number of people identified that there is a need to work in partnership to achieve the objectives of the FRMP.

The majority of responders were neither satisfied nor dissatisfied with using the e-consultation tool to respond. The general feedback was that the questions asked were too rigid and it was difficult to navigate through the system. However the workshops and local meetings provided a good platform for people to ask questions regarding the FRMP consultation process.

The word diagram below illustrates some of the key themes that were raised in the responses.



Feedback was received from the following

**Table 11 Breakdown of responses by organisation type Humber RBD**

<b>Organisation type</b>	<b>%</b>	<b>Number of responses</b>
Individual	27.9	12
Environment management (including NGOs)	13.9	6
Farming/land management	2.3	1
Government, local	39.5	17
Government, national	4.6	2
Leisure / tourism	0	0
Transport / navigation	0	0
Utilities	6.9	3
Not entered	4.6	2
<b>Total</b>		<b>43</b>

## Summary of consultation feedback

The following pages summarise for each question the general themes emerging from the consultation and highlights areas that are being taken into consideration for the final FRMP.

### Question 1: "Do you agree that this draft plan sets out the most significant flood risk issues for your area? If not, please explain what you think is missing"

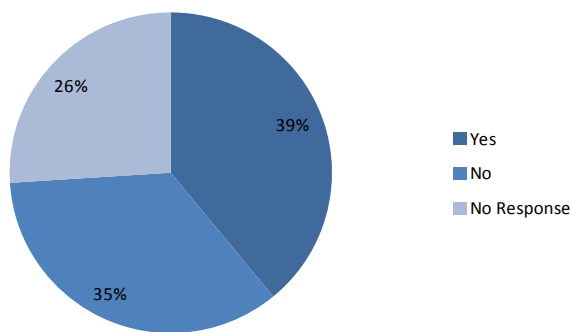


Figure 22 Humber responses to question 1

Many people did not respond to this question directly and as such slightly more than half of all responders said they did not think that the draft FRMP sets out the most significant flood risk issues for their area. Those who did agree were mainly from the local government sector. Given the reasons for not agreeing with the question, as set out below, it suggests that further work is required to set out the scope of the FRMP. For those responders who felt that the plan did not cover all the issues, common themes which they felt were missing included:

- sources of flooding
- maintenance
- local Flood Risk Management Strategies (LFRMs)
- catchment Management

It was felt that to gain a true reflection of significant flood risk, the document should include the risk of groundwater and surface water flooding. It was also noted that the scale and scope of coastal flooding was underrepresented. Those that raised concerns about sources of flooding suggested that by including this information,

*"...[it would] make it clear to people what the different sources of flooding are so that they can be better informed and prepared"*

Linked to being better informed and prepared, another point was raised about roles for organisations involved in flood risk and needing greater clarity on what these roles are. It was felt that this clarity would be of benefit to local communities, so that they too would have a better understanding about how flood risk is dealt with and managed.

A responder from the farming / land management sector identified that,

*"The FRMP should look to establish long term programming of maintenance activity and highlight where current investment is both insufficient and more cost beneficial to the overall performance of the system than capital schemes"*

Several responders highlighted issues around the long term maintenance of flood risk assets and continued investment in said structures. Further clarity was requested in regards to responsibility for maintenance regimes as this was not clear in the FRMP. At a catchment scale, concerns were also expressed by a local government source as to how ongoing programmes of maintenance could be proportionally better represented as they are fundamental to flood risk management activities. For one responder it was felt that LFRMs needed to,

*"...play a much stronger role in developing the objectives and measures contained in the FRMP"*

In parallel to this comment, it was suggested that by working together and sharing strategic thinking there is an opportunity to strength relationships between Risk Management Authorities (RMAs) and the Environment Agency, in order to develop a forward focused plan which links both LFRMs and the FRMP.

## **Question 2: "What do you consider to be the highest priorities for managing the risk of flooding in your area?"**

Many of the responses were summarised as bullet points to identify highest priorities for managing flood risk. One of the main priorities that was referred to by a local government responder was the programme for maintenance of existing assets. It was suggested that the FRMP needs to be clearer around the long term programme of maintenance activity and concerns to be addressed on withdrawal of maintenance on a catchment scale.

Another theme for high priority which emerged from the responses was working in partnership across all organisations involved with managing flood risk and that these partnerships involve local communities. This would allow for the sharing of data and a greater understanding of roles and responsibilities. Communities would become better prepared and more resilient to the impact of flooding.

Surface water flooding was identified by several responders and the need to understand the interactions between surface water and other sources of flood risk.

*"The consultation draft FRMP contains little reference to the surface water element [sic] and so does not fully reflect local issues and priorities..."*

This priority directly links to community engagement as it was suggested that clarity on the different sources of flooding would mean communities are again better informed and prepared.

Responders felt that reducing flood risk by working with natural processes was a priority, particularly for organisations involved in environmental management,

*"...long-term catchment plans (works and evidence gathering) for reducing flood risk by working with natural processes should be a priority now in order to deliver flood risk benefits in the mid- to long-term"*

By working with natural processes, it was identified that there would be opportunities on a catchment scale to improve floodplain connectivity, create woodland to reduce flood risk and help deliver Water Framework Directive (WFD) objectives. One responder said that a measure should be included for opportunities to create habitat in the floodplain and another responder said a measure for upland management was needed.

A priority that was identified in several of the consultation responses was avoiding risk to and loss of life. Learning lessons from previous flooding events should guide policy and practices to ensure that this remains a high priority in terms of managing flood risk both now and into the future.

Other priorities which were considered by various organisations are summarised below:

- long term management of flood risk from all sources
- tidal flooding / coastal flooding
- detailed catchment risks
- land use
- local decision making
- opportunity mapping
- urbanisation and development
- preventing inappropriate development
- Sustainable Urban Drainage (SUDs)
- conservation and enhancement of the historic environment
- evacuating water from areas designated as flood storage
- flood risk to agricultural land
- food security
- agricultural land and production
- managing flood risk of farmland.

### Question 3: "Do you understand the objectives as described in the draft plan? If not, what would help you understand them better?"

For those consultation responses received over half agreed that they understood the objectives for managing the risk of flooding. These responses came from a variety of sectors including local government, RMAs, environment management (including NGOs) and individuals.

For those organisations / individuals who said they didn't understand the objectives, the main reasons given were that the objectives were not clear, there were inconsistencies between the objectives in different sections of the draft document and that they didn't understand what they were trying to achieve.

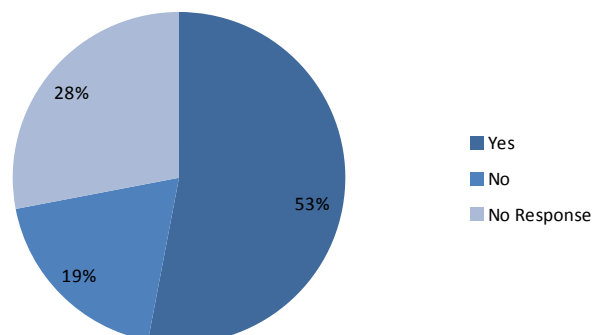


Figure 23 Humber responses to question 3

One responder noted that the draft FRMP didn't make it clear how the objectives would be monitored and how they would be reported on, to determine if the objectives were being met. As well as a system for monitoring and reporting, a question was raised around what investment and resources are available to actually deliver on the objectives, particularly around 'understanding flood risk and working in partnership',

*"...the links between the Flood Risk Management Plans and investment planning for flood risk management are not yet clearly defined enough. This lack of clarity may have an impact upon the efficiency and effectiveness with which RMAs are able to plan and coordinate resource and investment planning"*

There was some confusion around the inclusion of catchment objectives and RBD objectives. Most appear to be the same or similar but it needs to be clearer how individual catchment scale objectives are different to RBD scale objectives.

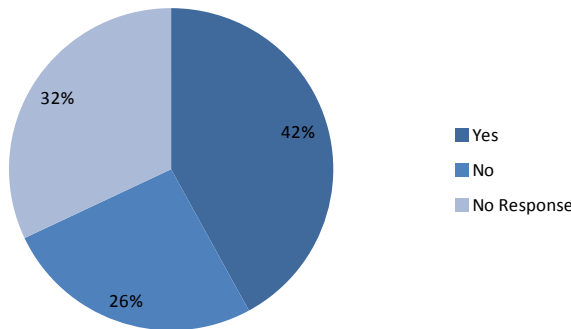
An environment management (including NGOs) organisation highlighted an inconsistency with how the objectives have been linked at a catchment level. It was felt that the environmental objective did not clearly set out how the environment can play a direct role in suggested that, reducing flood risk. The organisation

*"A specific objective to agree flood risk management measures with Catchment partnerships should reduce the likelihood that such natural approaches to flood risk management are overlooked"*

Such an environmental objective would make it clearer as to how natural processes and flood risk management are linked.

**Question 4: "Is the balance right between the 'social', 'economic' and 'environmental' objectives, as explained in the draft plan? If not, what would you change and why?"**

The majority of consultation responders (42%) felt that the right balance had been achieved between the three main objectives.



**Figure 24 Humber responses to question 4**

For those responders who said the objectives were not balanced (26%), similarly in response to question 3, they were challenged on their clarity, inconsistency and on what the objectives are trying to achieve.

*"We do not believe that the objectives are completely clear; this is primarily due to the fact that there appear to be several sets of objectives under the headings of Social, Economic and Environmental within the plan"*

*"This section currently assumes a prior knowledge by the reader of what objectives are and what they are trying to achieve. The plan needs to explain what is meant by Social, Economic and Environmental objectives. Some of the objectives need to be phrased more actively so it is clear what they are trying to achieve by the end of the plan"*

There was an acknowledgement from local government that there should be more importance paid to economic damages and the impact of climate change on food production, given the increase in severity of weather events. This was supported by other organisations, which identified that not enough precedence is given to the agricultural sector and the direct impact flooding has on a catchment scale.

For social objectives it was asked that more emphasis be placed on local communities and what they can contribute towards flood risk management. Giving communities more importance would allow them to implement their own measures for protection and have community flood plans in place.

One organisation said that it was unclear as to how the balance between the three objectives had been applied and which section of the draft plan this information was in

*"We believe it should be clearly stated if the plan gives one element a greater importance than others or if they are all of equal importance"*

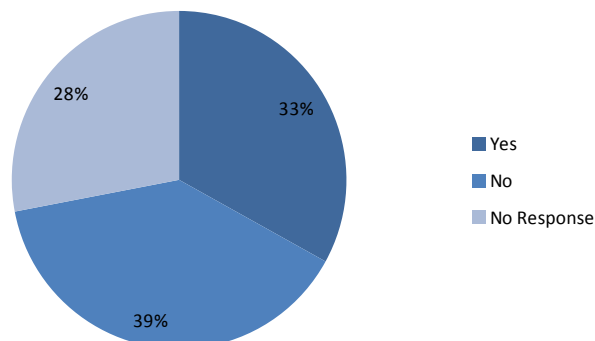


**Question 5: "Are there other flood risk management objectives that should be included? If so, please explain what they are and why they should be included"**

The majority of responders felt that no further flood risk management objectives needed to be included (39%). However some felt that the draft document had not covered all objectives and therefore additional ones should be included (33%).

Under the banner of economic objectives, one responder said that,

*"The FRMP should set an objective to ensure a Robust Revenue Maintenance Programme Exists"*



**Figure 25 Humber responses to question 5**

This objective would be welcomed as a way forward to working in partnership to deliver flood risk management in the rural sector. It was felt that not enough emphasis has been placed on flood risk management and its impact on the agricultural sector and ultimately the rural economy. It was suggested that an objective to recognise the value of agriculture should be included in order to raise the priority of this sector and recognise the impacts that flooding can have.

Also under the banner of economic objectives, a local government felt that there should be an objective specifically for economic growth and not just reducing economic damage. Promoting development and growth would fit in with the ‘growth agenda’ for the national government and would take into account the local impacts flooding can have on the recovery time for businesses after a flooding event and the effects on the local economy.

An objective with regard to the implications of climate change was identified as one that should be included. Without considering climate change and flood risk, there is a risk that,

*"...opportunities to improve resilience could be missed and that solutions are not adequately future-proofed"*

*"... an objective associated with understanding and managing the risks from future challenges, such as climate change should be considered"*

A response to whether there are other flood risk management objectives that should be included was given for having regard to the different sources of flood risk. It was felt that there should be a separate objective that specifically looks at combined flooding and that this should link to other RMA measures and objectives.

Under the banner of environmental objectives, one responder identified that,

*"A specific objective to agree flood risk management measures with Catchment partnerships should reduce the likelihood that such natural approaches to flood risk management are overlooked"*

This was also highlighted by another environment management / non-government organisation who said,

*“Close partnership working with the CaBA partnerships could be a clearer objective”*

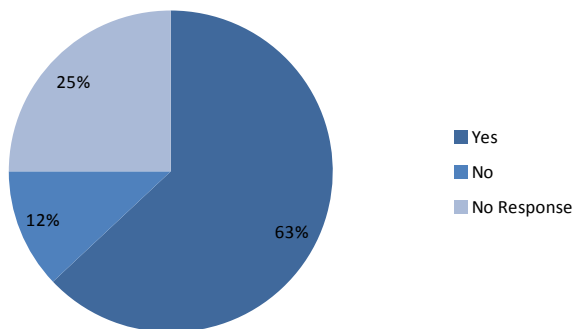
For one responder a specific environmental objective was suggested for inclusion around links between the FRMP and RBMP. It was felt that such an objective would provide links between flood risk management and opportunities for biodiversity.

It was asked to consider how flood risk and development can,

*“...better address economic growth and economic sustainability”*

This would be a social objective looking at working in partnership and seeking the opportunities which come about from ‘government initiatives such as Local Growth Deals’. This would give more emphasis to economic and social objectives to address flood risk management.

### **Question 6: "Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan? If not, what would help you understand them better?"**



**Figure 26 Humber responses to question 6**

Overall the comments received in response to the question is that yes, there is an understanding of the difference between the different type of measures (63%). The explanation is clear and the responders were able to understand what the measures are.

For those responders who answered no to the question (12%), clarity was needed around what each type of measure actual means. It was noted that for one catchment the text read that there were no agreed measures to manage flood risk, which would suggest potentially nothing will be done to manage the

risk in this particular catchment. A clearer understanding is needed about the definitions for how each measure has been categorised under ‘on-going, agreed and proposed’.

One individual commented that,

*“While the differences are explained in the draft FRMP, it is not clear how this distinction helps to illustrate flood risk management within the river basin”*

Although the types of measures and the differences between them have been explained, further clarity is needed as to how they demonstrate flood risk not only on a catchment scale but across the river basin district.

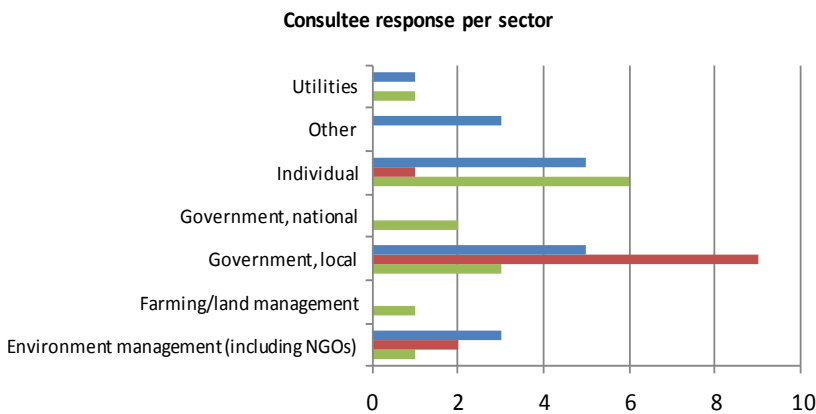
There are issues surrounding how the type of measures have been assigned and prioritised and ultimately how they will be monitored and reported on. It is suggested that further explanation is needed around the assessment process and what cost benefit and risk mitigation methods were applied in order to arrive at the final list of measures.

Other key issues that were raised about the type of measures in the draft FRMP were:

- deliverability and funding status of schemes on the Medium Term Plan (MTP)
- options to feed into the review of measures

- how measures can move from ongoing status and achieve a ‘step change’ in delivery
- the effects of climate change on the proposed measures
- pie charts are not a correct representation of the scale of measures.

**Question 7: Across all proposed, agreed and ongoing measures, the plan describes ‘prevention’, ‘preparation’, ‘protection’ and ‘recover and review’ approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**



**Figure 27 Humber responses to question**

As shown there was a fairly even split between those responders who felt the balance was right between the different approaches (39%) and those that didn't (28%). The majority of those were consultees from local government and environmental management (including NGOs) organisations. The graph below shows the number of responses per sector.

It was suggested that the approach was overly complex and had the potential to

*“...seriously misrepresent[ing] the scope and range of flood risk management activities undertaken within each catchment and the river basin overall”*

This was in reference to the pie charts that have been included which indicate in certain catchments that there are no actions which could send out misleading messages to the public, as work is being done or is planned. As well as this, from the same responder it was noted that

*“...the relative lack of detailed information on people and infrastructure at risk from surface water flooding means that the key statistics significantly underrepresent this aspect of flood risk”*

A positive message from a non-government organisation was the inclusion of working with natural processes as a proposed measure. This was seconded by another non-government organisation who welcomed actions which support creating a more natural catchment. A proposed change was to give natural processes for managing flood risk a higher prioritisation and look at their contribution towards WFD and BAP priorities. This could include opportunity mapping for woods and trees.

For those non-government organisations who felt the balance wasn't quite right, they suggested that

*“There are a lack of measures for the upper catchments to reduce flooding downstream. Measures to restore peat, to increase flood storage, connect rivers with their floodplain or create wetland habitat are not included”*

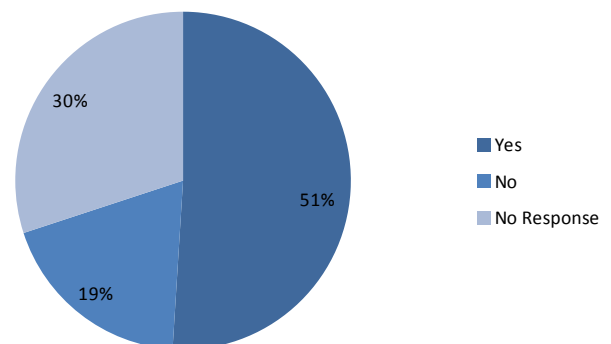
Other comments made which suggested the balance was not right included:

- maintenance should be listed as a key measure
- unable to assess the required level of investment for each measure
- no references to dredging
- too much emphasis on protection (an unsustainable way to manage flood risk) rather than prevention
- greater reference should be made to protection as these are physical schemes which reduce flood risk for communities
- more measures around preparing for risk should be included
- more measures on recovery and review to better understand the risk of flooding
- prepare for flooding by improving awareness of flood risk
- engagement with local communities
- acknowledge the economic benefits the measures will have to fit with the national government agenda for economic growth

**Question 8: “Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included”**

The majority of responders identified that there are other proposed measures that should be included. 22 said yes (51%), 8 said no (19%) and 13 didn't give a response (30%). For those who said yes the reasons were generally on a catchment scale and said there should be a greater emphasis on working in partnership and the advantages that this can bring.

*“Even if location specific measures are not included in the FRMP, it may be appropriate to include some general sewer flooding related measures... Including such measures may be especially pertinent where they will deliver benefits to multiple sources of flood risk...”*



**Figure 28 Humber responses to question 8**

It was identified that a measure around sewer flooding and the impacts of groundwater and surface water runoff should be included, as this would look at multiple sources of flood risk.

Another point which was raised in several of the consultation responses was including proposed measures to work with natural processes in order to reduce flood risk. It was felt this was a real weakness in the plan and the opportunity to reconnect rivers with their floodplain and naturalise river processes should be included as a proposed measure.

*“Wherever possible, efforts should be made to reconnect with the floodplain, to use natural river processes to slow the flow and reduce the impacts of flooding”*

*“There needs to be an increase in measures to reconnect rivers with their floodplain, naturalise river processes, and slow runoff in upper catchments”*

*“We would also like to be sure that all opportunities for natural flood risk management measures have been explored and picked up, including the installation of woody debris, the planting of more trees & woods”*

Some of the suggested comments for new measures included:

- SMP actions should be included in the plan
- the impacts of climate change on proposed measures
- habitat improvements are incorporated within each of the proposed measures
- flash flooding should be considered when working to reduce flood risk
- dredging of silted up rivers
- working in partnership to slow the flow in upper catchments
- flood risk measures that stimulate sustainable economic growth and improve wellbeing
- policies from the proposed draft LFRMS need to be included

### **Question 9: “How can you support the work set out in the draft flood risk management plan to reduce flood risk?”**

The response to this question highlighted many different ways in which responders felt they could support the draft plan. The main theme was working in partnership across all interested parties to reduce flood risk,

*“...close partnership working between the risk management authorities for all sources of flooding”*

*“Through exchange of knowledge across all interested parties, groups and organisations”*

*“... a strong partnership approach to flood risk management...”*

*“... identify and prioritise opportunities to work in partnership to reduce flood risk”*

*“With our proactive approach to partnership working we are engaged with other risk management authorities across our region and are constantly working to improve this process”.*

*“[name removed] will continue to promote, participate and host partnership activities. [name removed] officers will support FCRM partnership activities. [name removed] will share model and other data with partners”*

*“We would encourage the EA and other RMAs to contact us directly if, as the measures are being undertaken, opportunities to work together for mutual benefit are identified”*

Other support ideas that were put forward included:

- supporting schemes that will reduce flood risk to local citizens
- using a catchment based approach to deal with flood control
- engagement with Catchment partnerships

- specific measures where there are opportunities to provide biodiversity benefits
- ensure local communities are prepared for flooding and encourage them to implement their own measures where appropriate
- take on management of sites created as a result of flood risk management operations
- data exchange in respect of sewer flooding to aid understanding
- ensure future development does not increase flood risk
- provide and maintain and highway drainage network
- understand risk through modelling
- work together to promote and deliver resilience / flood proofing measures in accordance with FRMP measures
- provide funding in support of improving the water environment through tree planting

**Question 10: “Are there things you think should be done to improve coordination of river basin and flood risk management planning?”**

In response to this question there was agreement that there needs to be better coordination between the plans. Quotes taken from the responses have been used to summarise this below.

**Table 12 Quotes summarising feedback on FRMP and RBMP co-ordination**

<i>“Sharing of expertise, especially across two tier authorities would enable more to be achieved”</i>	<i>“...catchment based approach to engage others with decisions...”</i>
<i>“Early involvement of other RMAs and stakeholders... would allow for greater integration and co-ordination of activity”</i>	<i>“We recommend utilising existing established partnerships at a catchment / local scale to improve coordination”</i>
<i>“Improved engagement with organisations and individuals interested in flood risk management. Improving links between actions and funding mechanisms for the delivery of the WFD and FRM plans together”</i>	
<i>“Specific measures should be cross linked between both plans in order to ensure that they are providing multiple benefits i.e. achieving WFD objectives whilst also providing a flood risk management function”</i>	
<i>“More communication with landowners”</i>	<i>“...talk to IDBs”</i>
<i>“...numerous opportunities to achieve additional benefits and/or be more efficient with the use of resources...”</i>	<i>“...local partnership groups take on some accountability for the monitoring and delivery of the FRMP and RBMPs...”</i>
<i>“If water quality and flood risk were more closely aligned then it may be possible to achieve multiple benefit schemes that would deliver greater value for money”</i>	
<i>“Clearer information on who does what would help”</i>	<i>“In co-coordinating RBMP and FRMP activities there are opportunities to increase efficiency by reducing duplication through surveys and studies...”</i>

<i>"All RMAs need to be aware of what is contained in the FRMPs and the RBMPs so that any proposed measures can maximise benefits and funding opportunities and provide better value for money"</i>	
<i>"...the full integration of the flood risk management into the work of the catchment partnerships would go a long way to ensuring that all multiple benefit projects and ideas are identified at the earliest opportunity"</i>	<i>"...more could be done at a strategic level to identify opportunities to implement measures that deliver both a flood risk benefit and a water quality benefit"</i>
<i>"...action plan should be drawn up for each watercourse or area that encompasses both river basin and flood risk management planning. This approach may allow what funding is available to realise greater benefits than when being used for single purposes"</i>	

### Additional Feedback for the Humber River Basin District

As well as direct responses to the questions set out above, there were a number of responses to the consultation which were received outside of the online consultation tool. The information gathered from these respondents is briefly summarised in this section.

**Table 13 Additional Feedback for the Humber River Basin District**

Comments made	Source	Linked to question
Around the Humber Estuary, consideration should be given to rising sea levels and how changes in flood protection can take account of this change.	Individual	1. "Do you agree that this draft plan sets out the most significant flood risk issues for your area? If not, please explain what you think is missing"
Key topics to consider include: <ul style="list-style-type: none"> <li>• Food security</li> <li>• Valuing agricultural land and production</li> <li>• Land use and agriculture</li> <li>• Urbanisation, development and civil infrastructure</li> <li>• Maintenance and revenue investment</li> <li>• Consideration of risk and consequences</li> <li>• Soil</li> <li>• Natural flood risk management, woodland and washlands</li> <li>• Modelling</li> <li>• Riparian responsibilities</li> </ul>	Farming / land management	2. "What do you consider to be the highest priorities for managing the risk of flooding in your area?"
The 'high level' nature of FRMPs mean there is insufficient detail to understand nature or effects of individual measures. Also difficult to gain full understanding of the strategic approach to flood risk management.	government, national	8. Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included"
The actions are too general to identify the	government,	"Are there things you think should

Comments made	Source	Linked to question
potential impact on the historic environment. Engagement with relative organisations when proposing works.	national	be done to improve coordination of river basin and flood risk management planning?"
The vulnerability of most heritage assets (designated and non-designated) to flooding, including occasional flooding and the potential harm to or loss of their significance.	government, national	2. "What do you consider to be the highest priorities for managing the risk of flooding in your area?"
The potential impact of flood risk management measures on heritage assets and their settings, and including impacts on water-related or water-dependent heritage assets.	government, national	2. "What do you consider to be the highest priorities for managing the risk of flooding in your area?"
Key topics to consider include: <ul style="list-style-type: none"> <li>• FRMPs as a concept</li> <li>• Defining 'cultural heritage'</li> <li>• Improving the environment objective</li> <li>• Clarifying actions proposed</li> <li>• Maintaining up to date baseline information</li> <li>• On-going dialogue</li> </ul>	government, national	General areas of interest in relation to the draft FRMP.
The use of flood walls and barriers should be avoided and more natural and sustainable solutions used.	Environment management (including NGOs)	8. "Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included"
In each plan under the section titled 'What types of flood risk are included in the FRMP?' the FRMPs state that it will "show how flood risk management measures coordinate with measures outlined through river basin management planning under the Water Framework Directive." It would be helpful if the text here could explain if and how the co-ordination with other relevant plans will be considered.	Environment management (including NGOs)	General comments about improvements to the text for clarification.
Policy CC1 of the East Marine Plan reads as follows: 'Proposals should take account of: o How they may be impacted upon by, and respond to, climate change over their lifetime and o How they may impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.' The [name removed] organisation would anticipate that this will be of relevance to the measures proposed in the Humber Plans and therefore consideration should be given to	Environment management (including NGOs)	8. "Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included"



Comments made	Source	Linked to question
referencing this within the document.		
Section 13 of the FRMP refers to monitoring once the FRMP is in place. It would be useful to have more information on this, particularly on how a monitoring plan will be produced and whether it will be based entirely on existing information or if it new data will be gathered	Environment management (including NGOs)	General comments about improvements to the text for clarification.

## Consulting in the Humber River Basin District

Our approach to promote the consultation locally was predominately via emails and meetings with our stakeholders. Staff involved in meetings with stakeholder groups and partners shared information across 22 meetings and 10 workshops to highlight and discuss the consultation.

The Environment Agency also promoted the consultation locally through:

- periodic Strategic Partnership meetings between July 14-January 15
- representation at the October Trent and Yorkshire RFCC meetings

**Table 14 High level summary of engagement Humber RBD**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	22	East Riding of Yorkshire Council, East Riding of Yorkshire Flood Resilience Board; Strategic Flood Risk Partnership; Hull City Council, Yorkshire Wildlife Trust; Local Nature Partnership; Yorkshire Dales Rivers Trust; Friends of Bradford Beck, Lead Local Flood Authorities Network (Staffordshire, Warwickshire and West Midlands); North Yorkshire County Council; Chesterfield Water Management Group, Birmingham City Council Water Group; Lincolnshire County Council; North East Lincolnshire Council; Natural Assets Group (Staffordshire Trent Valley), Staffordshire & Shropshire Lead Local Flood Authority Delivery Group; Leicestershire Strategic Flood Board; East Midlands Lead Local Flood Authority Network; Trent & Ancholme Partnership Group; RSPB; UK Steel Committee; South Yorkshire Forest; South Yorkshire Local Nature Partnership; Hull Integrated Strategic Board, Derbyshire Strategic Flood Board; Birmingham & Black Country Local Enterprise Partnership; West Midlands External Funding Group; Derbyshire Technical Officers Group; Stoke & Staffordshire Local Nature Partnership; Nottingham City Council Lead Local Flood Authority; Water at Leeds, Leeds University; Lincolnshire Wildlife Trust; North Yorkshire County Council; NFU Regional Board, Scarborough Council; North Yorkshire County Council; City of York Council.
<b>Workshop</b>	10	Yorkshire Water Services, City of York Council, Risk Management Authorities (LLFAs, IDBs Highways Agency), Torne Catchment Group; Idle Catchment Group; Forestry Commission; Natural England
<b>Email</b>	5	North Yorkshire County Council, East Riding of Yorkshire Council; Lincolnshire County Council; North East Lincolnshire Council; North Lincolnshire Council; Dale to Vale Rivers Network, Lead Local Flood Authorities
<b>Briefing/ emails</b>	3	South Yorkshire Land Drainage Forum, West Yorkshire Lead Local Flood Authority Liaison Meeting, Central Lincolnshire Drainage Group
<b>Press releases</b>	1	Local Media press
<b>Public engagement</b>	1	Local residents
<b>Telephone calls</b>	multiple	Lead local flood authorities

### 3.4. North West River Basin District

The North West River Basin District (RBD) covers Cumbria, Lancashire, Greater Manchester, Merseyside and Cheshire. It also includes parts of Yorkshire, Derbyshire, Staffordshire and Shropshire. There was a good spread of responses from different organisations throughout the North West including catchment partnerships, environmental non-governmental organisations and strong levels of response from local government. Sectors such as agriculture, academia, water industry, angling, interest groups, general public and navigation also responded.

64 responses were received for the North West RBD. The level of detail in the responses to the consultation questions varied greatly. Some responses concentrated on single issues whilst others gave comprehensive thoughts on all of the questions. Many consultees felt that the importance and implications of climate change should be further emphasised and better portrayed.

A clear issue that emerged was that having multiple sets of objectives at River Basin District and catchment scale was confusing. There were a number of proposed measures submitted for consideration as part of the final plan and strong desires to increase linkages between the Flood Risk Management Plan (FRMP) and the River Basin Management Plan (RBMP).

Other recurring themes from respondents included the role and importance of maintenance, natural flood management and increasing partnership working. The word diagram below illustrates more of the key themes that were raised in the responses.



The majority of consultation responses were from local government, with 40% of the responses. These were largely from LLFAs within or partially within the NW River Basin District. The remainder sectors that responded are summarised below

**Table 15 breakdown of responses by organisation type North West RBD**

Organisation Type	%	Number of responses
Individual	7.81	5
Environment management (including NGO'S)	18.75	12
Farming/land management	7.81	5
Leisure/Tourism	4.69	3
Utilities	3.13	2
Professional members/Institutes	1.56	1
Government, local	40.63	26
Government, National	3.13	2
Other – combined response from several organisations – public/private sector	0	0
Other – DEFRA Family	10.94	7
Other – Developer	0	0
Other – Fisheries Interest Groups	0	0
Transport/navigation	1.56	1
Total		64

## Summary of consultation feedback

The following pages summarise for each question the general themes emerging from the consultation and highlights areas that are being taken into consideration for the final FRMP.

### Question 1: “Do you agree that this draft plan sets out the most significant flood risk issues for your area? If not, please explain what you think is missing.”

A significant number (47%) of responses to this question agreed that the plan covers the most significant flood risk issues for them.

Some of the responses highlighted specific local issues that should be mentioned in the plan, including restoration of upland moorland, a local erosion issue in the Wyre catchment, land drainage issues in South Fylde and East Lytham, historic flooding on the Wirral and protecting agricultural land in the Alt and Crossens catchment.

A number of respondents made reference to general issues that should have more emphasis; including regular maintenance, increasing community resilience and engagement, surface water flooding and natural flood management.

*“The positioning of community engagement within these plans should be more central and given more priority.”*

Some Lead Local Flood Authorities (LLFAs) called for more information on the following areas:

- the scale and impact of climate change
- identification of known flood risk locations
- land use change as a risk and mitigation method
- supporting sustainable development
- groundwater flooding and risk from multiple sources of flooding
- funding limitations and the need for partnership working
- benefits, practicality/limitations and promotion of Property Level Protection

*“Stronger emphasis should be made of sustainable economic growth in order to avoid increasing flood risk through inappropriate development.”*

One LLFA felt the relationships between various strategies and plans should be made clearer. Another response expressed a desire for more mention of Local Planning Authorities (LPAs) and Coastal Protection Authorities (CPAs) as well as LLFAs, and further catchment-scale emphasis on flooding from non Main River and surface water for the Lune catchment.

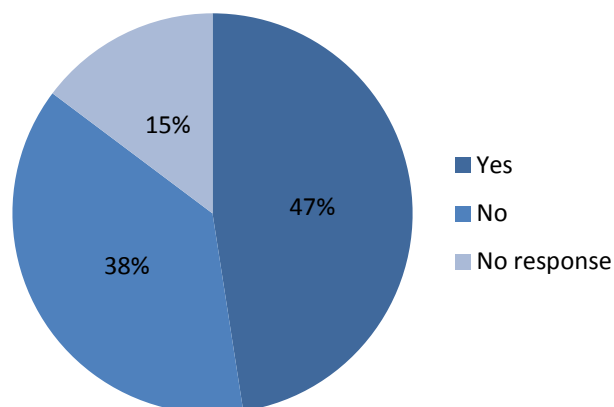


Figure 29 North West responses to question 1

## Question 2: “What do you consider to be the highest priorities for managing the risk of flooding in your area?”

The most common priority across consultation comments was the protection of people, property and infrastructure from flooding. Other themes raised were as follows:

- local Authority consultees highlighted the issue of surface water management, introducing Sustainable Drainage Systems (SuDS) and the inadequacy of existing drainage systems to cope with extreme rainfall.
- other priorities raised included regular maintenance, development regulation, availability of funding and investigating/understanding flood risk.

*‘Provision of SuDS schemes on all new developments and retrospective development of SuDS, with funding available and a greater willingness and support of such an approach as an alternative to surface water sewer and highway drainage upgrades.’*

*‘Understanding the assets within the Borough area and the flood mechanisms is critical to being able to manage flood risk.’*

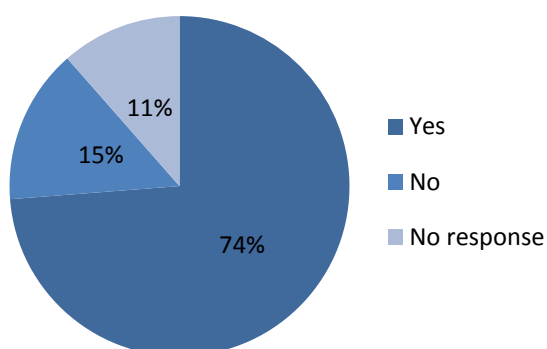
*‘Managing the risk of flooding on the Lower Irwell through the provision of additional defences in combination with other measures (e.g. community awareness, emergency planning, development management)’*

- the increasing importance of natural flood management, some specifically highlighting floodplain/upland woodland creation, buffer zones, restoring floodplain connectivity and hedge creation.
- agricultural land & food security
- community Resilience
- climate Change; including the potential effects on our weather as well as the performance of existing flood risk management assets into the future.

*‘Potential increases in the frequency of extreme weather events and sea level rise as a result of climate change.’*

- improved partnership working and communication

## Question 3: “Do you understand the objectives as described in the draft plan? If not, what would help you understand them better?”



Approximately three quarters of those who responded to this question agreed that they had a good understanding of the objectives as described in the draft plan.

The general consensus of those who answered yes was that objectives were easy to understand. However, a number of comments were expanded upon to make the following points:

Some respondents felt that there needed to be more clarity about whether objectives were to be delivered in

isolation or in combination. It is suggested by respondents that schemes should not be delivered on a “single objective basis” and that the final FRMP would benefit from “clear explanation of how the objectives will be achieved, and or actions assessed against the objectives”

- One comment recognised the benefit of having catchment/flood risk area specific objectives, but suggested that links between local and overarching objectives was difficult to identify given the large quantity of objectives across several sections of the draft FRMP.
- Use of abbreviations within the draft FRMP does not promote clarity and understanding.

A number of respondents were concerned that objectives in the draft FRMP do not link specifically with flood risk management strategies at a local level and felt that the connection between national and local strategies should be clearer. Further to this, it was also highlighted that the ability of Risk Management Authorities (RMAs) to plan future resources and investment effectively may be negatively impacted, if links between objectives and investment planning are not more clearly defined within the draft FRMP.

*“The FRMPs should link together local strategies to provide a much clearer connection between local flood risk management strategies and the national FCRM strategy and provide the basis for partnership working”*

The responses that answered no to this question suggested a number of factors that hindered understanding. These include:

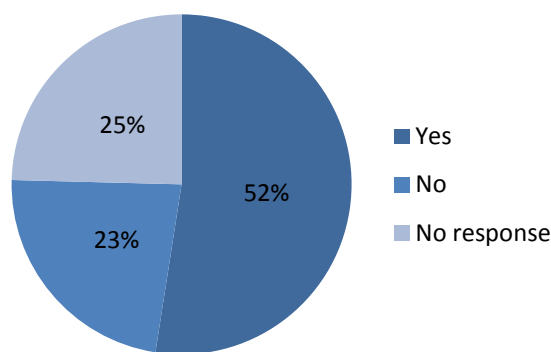
- multiple sets of objectives at River Basin District and catchment scale are confusing
- differences between objectives across draft FRMP sections made it unclear if/which objectives are priorities.

*“We would expect there to be consistency in the objectives throughout the plan and for them to be attributed in a similar way”*

- some objectives appear to be less measurable and more “aspirational”
- objectives are attributed explicitly under individual ‘social’, ‘economic’ or ‘environmental’ headings, but some have the potential to be applicable to multiple headings

#### **Question 4: “Is the balance right between the ‘social’, ‘economic’ and ‘environmental’ objectives, as explained in the draft plan? If not, what would you change and why?”**

A majority of the respondents considered that there was a balance between the social, economic and environmental objectives. Concerns were expressed about the difficulty of achieving a balance in practice but also understanding how the objectives would be applied in the delivery of the measures. There were also concerns that a focus on one particular objective may result in unacceptable impacts against other themes. There was felt to be a need to clarify how objectives will be considered and weighed to inform priorities and influence decision-making about delivery of measures. There was good support for consideration of



**Figure 31 North West responses to question 4**

ecosystem services, indicated under Objective 3, as part of flood risk management.

On the application of the objectives, points raised included:

- measures should be presented against the multiple objectives
- objectives should be used to evaluate the extent to which the three strands of sustainability (social, economic and environmental) are addressed by the measures
- objectives should be used to affirm the extent of an integrated approach to flood risk management

Specific points made on the objectives were:

- social objective 4 reads as a proposal or measure and needs re-wording
- use of the verb "minimise", within the social and economic objectives, could lead to unacceptable impacts elsewhere; the phrase "significantly reduce" may be more appropriate
- allowing natural sediment processes, Objective 9, is crucially important for habitat
- sustainable soil management, Objective 10, is highly important and should refer to reduction of soil compaction and soil stabilisation through tree planting
- the objectives should embrace sustainable outcomes such as conservation of industrial heritage, including watermills, and hydroelectric installations.
- objectives do not seem to have been used in the Alt Crossens or Mersey Estuary Catchment Flood Management Plans (CFMPs)

### Question 5: “Are there other flood risk management objectives that should be included? If so, please explain what they are and why they should be included?”

The majority of responses to this question indicated a need for further objectives in the final plan, with varied suggestions. Some of respondents suggested objectives were:

- safeguarding of critical infrastructure, transport and utilities
  - *“Working with the Catchment Based Approach (CaBA) partnerships should be explicitly identified as an objective”*
  - increased communication with riparian landowners to increase their knowledge of riparian landowner rights and responsibilities and inform them of future maintenance strategies
  - *“A key objective of any flood risk management delivery should be to engage the public and educate them about both the positive and negative environmental impacts of the works which are being undertaken. It*

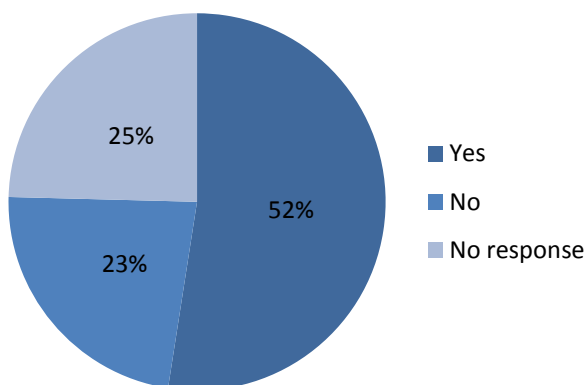


Figure 32 North West responses to question 5



*is crucial to increase understanding of flooding, hydromorphology and the fact that flooding is a natural process”*

- emphasise the importance of flood mitigation in supporting sustainable economic growth
- *“Research into the effects that the planned house building & other developments will have on sewer/waste-water flooding issues”*
- gathering of evidence to assess impacts of implemented actions. Research and collection of evidence will facilitate funding of new projects
- *“We feel it would be useful to have a specific objective which relates to Planning and Development because it is so important to preventing flood risk”*
- an objective on Risk Management Authorities working together to deliver a holistic approach to flood risk management
- *“Greater protection of farmland, parkland, amenity areas”*
- raising of flood risk awareness of businesses and communities at risk of flooding, which would improve flood resilience and flood warning uptake
- *“Ensure that flood risk management is delivered taking account of the social and economic challenges that can influence effective flood risk management in poorer communities”*
- prioritise protection of most productive and versatile agricultural land

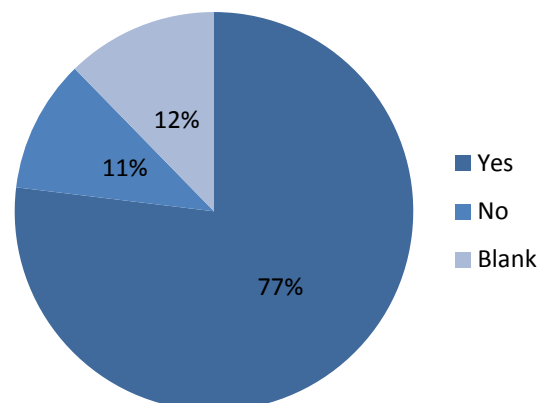
### **Question 6: “Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan? If not, what would help you understand them better?”**

Approximately 88% of the consultation responses for the North West responded to this question, with 12% leaving it blank. The majority of those who responded (77%) confirmed that they understand the difference between the on-going, agreed and proposed measures.

*“We believe the differences between the types of measures (on-going, agreed and proposed) are clearly stated within the plans”*

Some of the respondents who answered yes to this question also made the following points:

- the majority of the measures appear to be ongoing or agreed with a lack of proposed
- greater explanation is required as to why in some areas or catchments there are currently no proposed measures
- as many measures have been amalgamated from existing plans and strategies it is essential to ensure that these measures remain up to date and valid
- interactions between the three types of measures (social, economic and environmental) need to be explored
- one consultee showed their support for several of the RBD wide measures



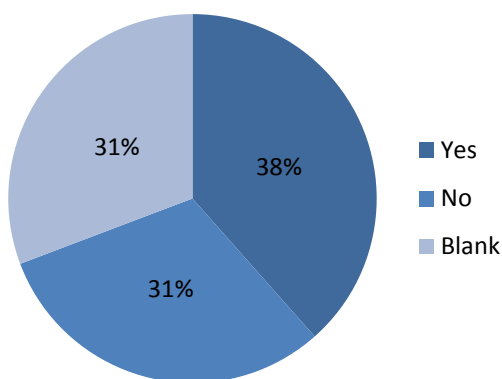
**Figure 33 North West responses to question 6**

The responses that answered no to this question highlighted a number of factors which they felt made it difficult to understand the differences between types of measures. These include:

- there is too much information in the plan, making it difficult for users to access and understand the key information. This applied to definition of measure and also implementation details for specific measures
- there was insufficient information about the role of communities in reviewing measures

*“The draft FRMPs are overly complex. Although the plans contain explanations of the terms they use, this complex differentiation between measures, and focus on quantifying measures is confusing and makes the plans difficult for local users to understand”*

**Question 7: Across all proposed, agreed and ongoing measures, the plan describes ‘prevention’, ‘preparation’, ‘protection’ and ‘recover and review’ approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**



Around 70% of the consultation responses for the North West answered this question, with 30% leaving it blank. Of those who did respond to this question there was an almost even split with 55% of respondents answering yes, that they felt the balance was right between the different types of approaches in the draft FRMP.

Additional comments from those who answered yes to this question are summarised below:

- all measures should aim to take a holistic approach to managing flood risk
- although the balance of the measures was right, there was insufficient information on the amount of funding available to implement them
- the importance of prevention measures should be emphasised

**Figure 34 North West responses to question 7**

*“We believe that the overall balance between Preventing, Preparing, Protecting or Recovery is appropriate”*

Those who answered no to this question provided a number of reasons as to why they felt the balance of measures was not correct in the North West plan. These include:

- greater emphasis should be given to prevention measures
- some measures appear to be in the wrong categories making it difficult to assess the balance
- there is a lack of recovery and review measures within the plan, particularly in the Alt Crossens catchment
- the number of measures in each category may not be a representative way of assessing whether the balance is right as it gives no indications of the individual scope or priority of the measures in each category

- it would be easier to answer this question if Environment Agency and Lead Local Flood Authority measures were displayed in one table
- there is not enough importance placed on food security and the value of agricultural land

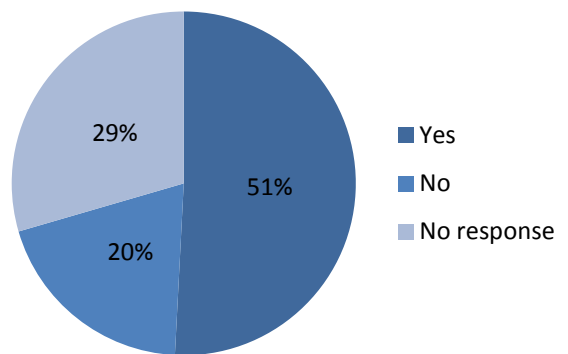
*“It is difficult to get a feel for the balance from the draft FRMPs”*

*“We feel there should be a greater emphasis on prevention and that some of the measures that are listed in protection should be classified as prevention”*

Some consultees felt that based on the information in the draft plan they were unable to comment on this question or that they were not in a position to comment.

**Question 8: “Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included.”**

Just over 50% of responses to this question stated that there were other measures that should be included in the North West FRMP. There were several further proposed catchment specific, as well river basin and national, measures that will be considered for the final plan. The key areas for improving measures are detailed below.



**Figure 35 North West responses to question 8**

**Making measures more specific:**

*‘FRMPs should show who is doing what, where and when in each catchment, in terms of strategies and broad actions’*

- The majority of comments stated that they expected measures to be more specific, measurable, achievable, realistic, and time related (SMART).
- The relationship between the measures and actual flood risk could be made clearer and show how it linked to the national flood risk strategy.
- The recognition of the Environment Agency’s strategic overview role and the proposal to seek an improved understanding of flood risk from canals was welcomed.

**Linking FRMP and RBMP measures:**

A number of responses highlighted a need to ensure FRMP measures were linked where possible to RBMP measures and to other existing flood plans such as surface water management plans and marine management plans. It was also noted that some of the Medium Term Plan measures were missing and needed to be included if appropriate.

**Proposed measures:**

*‘Flood risk was likely to have been looked at historically but the FRMP should have a measure to help with future planning including the impact of delivery of the FRMP measures.’*

Several asked for studies on the impacts of proposed housing allocations on flood risk and on the existing sewer systems. Respondents also wanted surface water to be more prominent and more focus given to culverts and their maintenance, SUDs and green infrastructure.

*'The interaction of surface water and sewers with river levels is vitally important and flooding from these sources is no less distressing to people. One potential measure that we would suggest around this is that water companies are included as planning consultees'*

Other proposals included:

- adding more prevention measures, including consideration of a reducing soil compaction, erosion prevention during high flows by managing invasive species
- further measures on making space for water
- adding further review and recovery measures
- taking into account our heritage assets
- prioritising measures in protected areas such as bathing waters
- adding measures which support food production and the agricultural economy
- assessing all Water Framework Directive (WFD) measures with flood risk ones even if they are cost prohibitive or technically infeasible
- support the agricultural community to develop plans to respond to flood risk and flood events
- more advice and guidance could be given to householders on how they can manage flood risk from their own properties

### **Partnership working**

Partners wanted to be more involved, especially in the early stages, and to be kept informed as the projects progressed. Many local examples were given, which could be covered, where possible, in the catchment summaries section of the final FRMP.

Although many partners have contributed to the draft FRMP already there were several requests for other partners to be mentioned, both for current contributions and to highlight projects and more importantly to volunteer to input to future measures, both in terms of delivery, funding and measure design. This was especially true for Catchment Based Approach groups. Several partnerships with the Environment Agency were highlighted as being very positive.

### **Maintenance and natural flood risk**

*'Be sure that all opportunities for natural flood risk management measures have been explored and picked up, including the installation of woody debris, the planting of more trees & woods'*

Several points were noted for maintenance and natural flood risk, including:

- investigate the role of forestry and woodland creation in rural or urban settings to reduce flood risk
- consider adding more upland management plan measures
- consider sharing maintenance plans with landowners

## **Question 9: “How can you support the work set out in the draft flood risk management plan to reduce flood risk?”**

There were a variety of ways in which consultees felt they could support the work of the draft flood risk management plan to reduce flood risk. Key themes that emerged from the responses provided include:

- partnership working and its associated benefits
- provision of advice and/or training to promote understanding; share best practice; achieve multiple benefits.
- planning and sustainable development
- natural flood management
- alignment of Local Flood Risk Management Strategies to the FRMP

More detail surrounding these themes can be found in the summary below:

The Regional Flood and Coastal Committee (RFCC) in the North West are working to integrate managing the water environment at a river basin and catchment scale including flood risk, water quality and water resources through partnership working and the implementation of innovative and sustainable interventions. This is being delivered through the development of a 2030 Vision, the following being key areas that support this:

- land Management – through the education and engagement of customers regarding water quality and flood risk management
- conservation – through encouragement of the wider use of ponds and lakes when developing strategic sites for business and industry
- community Resilience – by having strong objectives that facilitate increasing awareness of flood risk
- integrated Catchment Management – by monitoring / reporting on the success of partnership groups in linking flood risk and environmental outcomes
- sustainable Economic Growth – by working with business and encouraging this sector to take more responsibility for flooding
- climate Change – demonstrating impacts on flood risk through simple examples that people can relate to

The Catchment Based Approach Partnership (CaBA) identified a number of ways in which they could support work set out in the draft FRMP:

- representative could attend RFCC to support the work of FCRM
- provision of training to professionals on the implementation of natural flood risk management techniques
- working with CaBA partnerships provides greater opportunities for combined projects and funding
- CaBAs can lobby for, and influence policy
- provide access to volunteers for use in partnership working (on the ground)

Other ways in which consultees felt that they could support the work of the draft flood risk management plan to reduce flood risk include:

- LLFAs to collaborate with partners to manage flood risk within their area of influence

- early and effective consultation with all key stakeholders to ensure works do not increase flood risk at the catchment level.
- emphasis on the use of SUDS to control the rate of run-off to watercourses from impervious areas
- with a view to sharing knowledge; informing decision making and encouraging practice that seeks to reduce flood risk and provide wider environmental benefits, the following organisations would welcome consultation and some would be willing to provide advice and/or training regarding their areas of expertise:
  - The Wild Trout Trust
  - Midland Wind and Water Mills Group
  - English Heritage
  - The Amenity Forum
  - The Wyre Rivers Trust and Wyre Waters Catchment Partnership
- the Woodland Trust can provide advice and potentially contribute funding for partnership projects that include trees in their plans to reduce flood risk and improve the water environment.
- United Utilities will be proactive in working in partnership with other risk management authorities and identify that there are opportunities to work together to understand how water company assets can be included in future planning cycles.
- the Forestry Commission has been working nationally to develop the evidence base for the role of woodland in reducing flood risk and would welcome the opportunity to work with partners at the river basin level
- Moors for the Future Partnership (MFFP) are delivering land management actions to improve ecological condition and ecosystem service provision, including reducing storm flows, in upland catchments across the entire South Pennine Moors Special Area of Conservation. Evidencing with their impact on downstream flood risk is a priority
- the Royal Yachting Association (RYA) can work with recreational boaters to help prevent the spread of invasive non-native species
- the power industry can consider flood risk at power plant sites as part of the plant development process
- consideration of 'The Arnsdale & Silverdale Area of Outstanding Natural Beauty Landscape and Seascape Character Assessment' may benefit any flood risk management studies/proposals within this AONB

## **Question 10: “Are there things you think should be done to improve co-ordination of river basin and flood risk management planning?”**

Responses to the FRMP consultation suggest the following improvements for co-ordination of river basin and flood risk management planning:

- use catchment partnerships as an ideal forum for developing multi-benefit projects that deliver FRMP objectives and WFD targets
- have more consultation with key stakeholders to allow for collaboration on project design and delivery
- incorporate habitat creation into flood risk management schemes where possible
- listen to people on the ground on how water issues are affecting them
- have a better linkage between all catchment plans on a common catchment scale
- link the FRMP to Catchment Based Approach, referring to the work of other stakeholders
- acknowledge the work of organisations such as Rivers Trusts who are actively engaging and delivering works, often with flood risk benefits, achieving additional benefits more efficiently through an integrated approach to implementation of measures
- cross reference the measures in RBMP & FRMP documents with the use of appropriate visualisation materials
- use plain English documents that are inclusive for all to help with education of the issues
- combine the two documents as there should be a reduction in the number of plans produced covering flood risk management, including effective cross referencing in plans and strategies and delivery programmes
- more holistic partnership working at a local and sub regional scale
- stronger links with development planning and flood risk management/sustainable drainage processes to identify matched funding opportunities across social, economic and environmental programmes
- pick out where measures from the FRMP and RBMP geographically overlap
- include cost benefits in the Flood Risk Management Plan
- add to the list of areas where the EA are reviewing their maintenance work: Gowy; Lytham; Pilling; Cockerham
- should tourism have its own objective?
- increase the number of preventative measures
- the river basin and flood risk management plans should be more closely aligned with Shoreline Strategy Plans
- improve integration between the FRMP and Lake District National Park Partnership
- as an alternative to combining the two documents into one, provide a set of combined catchment summaries.

## Consulting on the North West River Basin District

The North West Flood Risk Management Plan consultation was promoted to predefined stakeholders via targeted e-mails (250+) and to the wider community, interests groups and the public using social media (a further 11,500 people were reached via 32 tweets). A number of meetings/workshops were held across all catchments within the river basin district and were all well attended by representatives from lead local flood authorities, local government & local nature partnerships, environmental organisations, sector representatives and statutory bodies. Wherever possible we promoted the 2<sup>nd</sup> cycle draft river basin management plan alongside the FRMP. A press release was issued at the start and the end of the consultation period and was published in the Westmoreland Gazette and the Skelmersdale Champion.

Staff involved in meetings with stakeholder groups and partners shared information on the FRMP at their meetings and workshops during the consultation period. Examples include:

**Table 16 High level summary of engagement North West RBD**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	53	53 (40 Catchment Partnership Meetings + Greater Manchester Wetlands Partnership; Wildfowl and Wetlands Trust; Cumbria County Council; Bollin Environment and Conservation; Atlantic Gateway - Sustainability and Environment Group; Merseyside and Greater Manchester Flood Risk Partnerships; NW Salmon Forum (NW Fisheries Consultative); South Pennines Local Nature Partnership; National Farmers Union (NW); Liverpool City Region's Nature Connected Board (Local Nature Partnership); Mersey Docks and Harbour Company (Peel Ports Limited); Countryside and Landowners Association; Meres and Mosses Landscape Partnership
<b>Workshop</b>	47	NW River Basin Liaison Panel members workshop; Weaver Goway Agricultural Sector Workshop; CLASP (LA and public sector sustainability support service for the NW); Campaign for the Farmed Environment (NFU and Douglas Catchment Host); Coastal and Estuary Workshop for dissolved inorganic nitrogen and phytoplankton issues; Chemical Industry Association; NW Regional Flood and Coastal Committee.
<b>Email</b>	multiple	Lead local flood authorities, key stakeholders.



### 3.5. Northumbria River Basin District

The Northumbria Flood Risk Management Plan covers the catchments of the River Tees, Wear, Tyne and the Northumberland Catchments draining to the North Sea. A largely rural area with the main developments located along the lower catchments and along the coast. We had a moderate return of responses to the consultation (16 responses) but with a good mix of organisations represented. 50% of responses were from government organisations, local councils or national bodies, 7% from leisure and farming backgrounds, 12% from utility companies and the remainder from environment management organisations.

16 responses were received for the Northumbria RBD. Overall the responses were largely supportive of the process and the plan itself, there were a number of suggestions for improvements both in the content and process on catchment management. A lot of the focus was around the measures and objectives and what the future expectations of the plan are. Some felt that it was too high level and complex and that it was not a more multi source flood risk plan. Many felt that the measures lacked local relevance and it was unclear which organisations were meant to be taking the measures forward. A theme throughout the responses was that there is a need to work in partnership to achieve the objectives of the FRMP.

The word diagram below illustrates some of the key themes that were raised in the responses



Feedback was received by the following organisation types:

**Table 17 breakdown of responses by organisation type Northumbria RBD**

Organisation Type	%	Number of Responses
Individual	0	0
Environment management (including NGOs)	25	4
Farming/land management	6.25	1
Government, local	37.5	6
Government, national	12.5	2
Leisure / tourism	6.25	1
Transport / navigation	0	0
Utilities	12.5	2
<b>Total</b>		<b>16</b>

## Summary of consultation feedback

The following pages summarise for each question the general themes emerging from the consultation and highlights areas that are being taken into consideration for the final FRMP.

### Question 1: "Do you agree that this draft plan sets out the most significant flood risk issues for your area? If not, please explain what you think is missing"

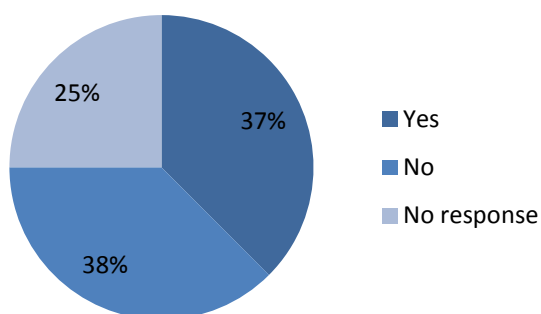


Figure 36 Northumbria responses to question 1

Of those that answer this question there was an even 50/50 split between the respondents, with half stating that the main flood risks were identified and the remaining ones believing that there were other flood risks that should be considered.

The plan itself outlined that for this round of FRMPs the main focus of the plan would be on those risks which were required to be included, these being flooding from main rivers, the sea and reservoirs. The plan does highlight that other sources of flood risk would be identified and addressed within the local flood risk

strategies and that the aim over the forthcoming FRMP cycle would be to align these plans more effectively to produce a true all sources of flood risk document.

For those responders who felt that the plan did not cover all the issues, common themes which they felt were missing included:

- sources of flooding
- new Development and urban creep
- local Flood Risk Management Strategies (LFRMs)

Most responses refer to surface water drainage, new development and flash flooding as aspects of flood risk which are not addressed fully in the plan. This is supported by comments from the responses

*"The extreme storm event of 28th June 2012 has raised public awareness of the importance of flood risk management within the Tyne catchment area. -Urban creep is a significant issue within the Tyne catchment area."*

*"Long term impact of increased surface water flows from the whole catchment as they become diverted from combined sewers or are generated by new developments."*

It was felt that to gain a true reflection of significant flood risk, the document should be more integrated with the other sources of flood risk across the plan area.

*"It is a shame that flooding from main rivers and reservoirs can't be considered in an integrated way with flooding from other watercourses (including the upstream / upland parts of main rivers) and surface water flooding. Surface run-off is really important"*

Further concerns identified within this section were associated with the ongoing maintenance of river systems, from an agricultural perspective and a recreational aspect. It was suggested that by working together and sharing strategic thinking there is an opportunity to strengthen relationships between Risk Management Authorities (RMAs) and the Environment Agency, in order to develop a

forward focused plan which links both LFRMs and the FRMP, it was also stressed that land owners and those working the land need to be fully involved in the discussions on management of the catchments.

## **Question 2: “What do you consider to be the highest priorities for managing the risk of flooding in your area?”**

The responses to this question ranged from specific locations, based on the areas of interest for the responder, such as the City of Durham, Middlesbrough, Team Valley and the Ouseburn Catchment, to broad principals of maintenance and development control. However, most agreed that the key priorities should be focused on the protection of people, property and infrastructure.

A common theme amongst many of the responses was around control of new development.

*“Development can also have a major impact on flood risk so developers, planners also need to be on board so that flood risk can be designed out and betterment can be achieved.”*

*“Controlling developments to provide betterment from all developments” Work with landowners and businesses to retrofit SUDS and greywater systems to reduce discharge into drainage systems during storm events.”*

To deliver this work a very strong theme was the continuation, establishment and development of partnership working.

*“The significant partnership working between the EA, Lead Local Flood Authorities and other risk management authorities is starting to deliver benefits in managing the risk of flooding.”*

*“ we wish to reinforce the need to continue to work together, in conjunction with the Cross Border Advisory Group, to ensure that no impacts from actions outlined in these FRM Plans adversely impact flood risk in Scotland or elsewhere”*

Going forward we will need to work hard on developing greater partnership working across both the risk management authorities, but also with those organisations working to improve the river environments and the landowners throughout the catchment. The use of natural land management and forestry was encouraged.

*“We feel there is great potential for land use change and management, including the creation of floodplain woodland and the planting of hedges and buffer strips on farms, to reduce flood risk in this River Basin District”*

Although concern was raised that we should not be imposing such techniques on land without full discussion and consultation with the land owners and tenants of those areas, and indeed we need to consider the risks to rural communities and helping those people with resilience and considering the risks to food production and the rural economy.

The maintenance of the existing defences and rivers was also raise as vital to ensure ongoing management of flood risk throughout the FRMP area.

*“The FRMP should set an objective to ensure a Robust Revenue Maintenance Programme Exists. We welcome investment in a revenue maintenance programme. This is critical if we are to maintain our existing flood defences and drainage infrastructure.”*

### Question 3: "Do you understand the objectives as described in the draft plan? If not, what would help you understand them better?"

Of those that responded to this question, 90% stated that they understood the objectives as outlined in the draft plan.

While on the whole, responses understood the objectives there were a number of comments suggesting that they could be made clearer between the main plan objectives and those in the catchment summaries. Reasons for this appear to be from the fact that objectives are stated in different parts of the plan and that the link between these is not as clear as it could be.

*"We do not believe that the objectives are completely clear; this is primarily due to the fact that there appear to be several sets of objectives under the headings of Social, Economic and Environmental within the plan."*

*"There appear to be differences between the statements in Sections 9, 10 and 11 and it is therefore not clear which, if any, should have priority"*

*"It is not clear how the catchment objectives sit within the overarching Flood Risk Management Plan objectives. We would also like to see a greater recognition within the objectives of the role which the environment can play in reducing flood risk."*

*"While there is an objective relating to the historic environment in both the main report and the individual Catchments, it only refers to some designated heritage assets and also confusingly refers to landscape value (when landscape merits a separate objective). Each River Basin District contains many important designated and non-designated heritage assets, particularly in terms of archaeology, which should be addressed."*

There were also some comments suggesting additional objectives should be considered.

*"More mention of partnership work and the Catchment Based Approach (and other partnerships) could be embedded in the objectives, throughout the document. There seemed to be little mention of Rapid Response Catchments in both documents"*

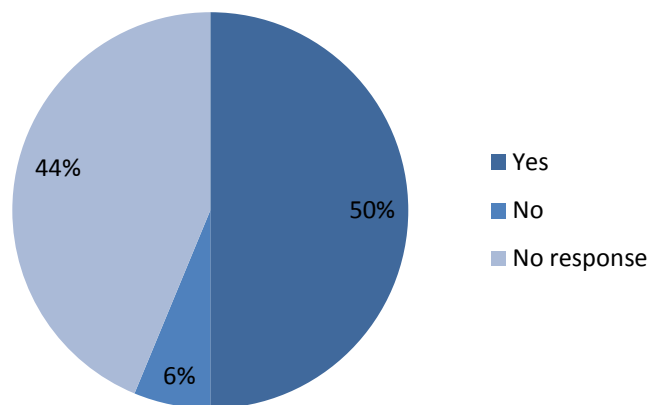
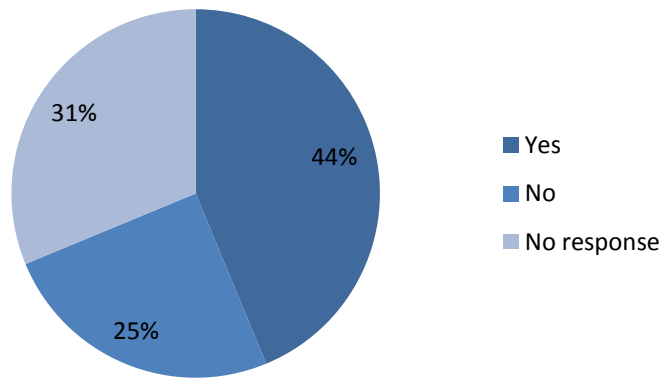


Figure 37 Northumbria responses to question 3

**Question 4: “Is the balance right between the social, economic and environmental objectives, as explained in the draft plan? If not, what would you change and why?”**

There was a more mixed response to this question with 64% of those responding agreeing that the balance was about right.



**Figure 38 Northumbria responses to question 4**

However, while a number responded that they were happy with the balance they clarified their response with further comments which will need to be considered going forward

*“We have not been able to identify any section within the plan that states what the balance is between the three objective areas of social, economic and environmental, it is also unclear how the balance has been applied. We believe it should be clearly stated if the plan gives one element a greater importance than others or if they are all of equal importance.”*

*“It is good to see a balance between social, economic and environmental objectives in both the overarching objectives and the ones for each catchment. However, the environmental objectives seem to refer almost exclusively to designated sites. A large proportion of ancient woodland across the UK does not have any protective designation and the objectives also fail to recognise the potential contribution of all types of green infrastructure, including trees and woodland, to the alleviation of flooding.”*

Of those that felt a change was required the comments suggested these tended to be directed towards specific additional objectives, rather than suggesting removal of existing ones from the plan

*“More consideration of expanding opportunities for Leisure and Recreation on and around the rivers.”*

*“Maximise opportunities for the use of agricultural land for flood management to protect communities but still considering the food security issues”*

Although counter to the previous response a note of caution was raised by another responder

*“The important role of agriculture within the catchment as a major industry, rural employer and producer of food should be recognised within the plan. Therefore agriculture and the rural economy must be a priority for local flood risk management and we believe that it should not be automatically presumed that agricultural land can be sacrificed for flood storage.”*

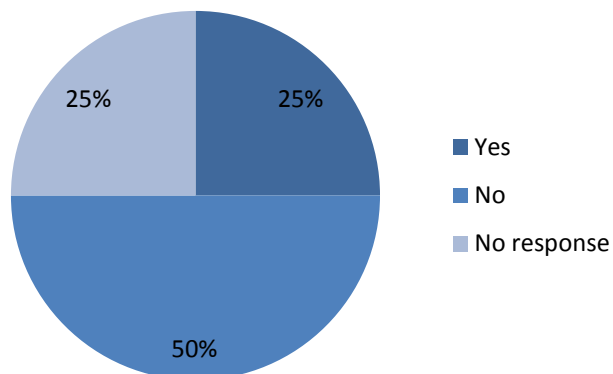
**Question 5: “Are there other flood risk management objectives that should be included? If so, please explain what they are and why they should be included?”**

Around 66% of those that answered this question directly suggested that no further objectives needed to be added to the plan at this stage.

Some responders indicated that they may have further comments on detail that comes from the main plan as they added the following comment to their response

*“None at this level”*

Of those that did consider that further objectives could be considered the main responses included



**Figure 39 Northumbria responses to question 5**

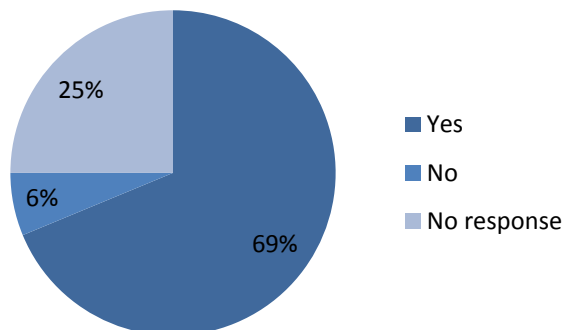
*“We would like to see integration with the River Basin Management Plan in order to see opportunities for flood risk improvements integrated with water and biodiversity objectives listed as a specific objective. There is a real need for flood risk management measures to be developed with catchment partnerships in order to see integration from the ground up. For example, working with the agricultural sector to reduce diffuse pollution as part of measures to deliver the Water Framework Directive could also include the planting of hedgerows and buffer strips along field edges which in turn would help reduce surface water run-off and potentially slow peak flows.”*

*“A specific objective to agree flood risk management measures with Catchment partnerships should reduce the likelihood that such natural approaches to flood risk management are overlooked”*

*“There needs to be an objective to work with businesses in the Tees Valley to manage surface water runoff and ordinary watercourse flows through the large industrial sites bounding the Tees particularly in the lower reaches where historic modification of the watercourse has introduced obstructions and lack of maintenance has restricted flows increasing the risk of flooding in the upstream catchment.”*

*“Climate change impacts on the tidal section of the River Tyne and the tributaries below the tidal limit. Keep a strategic transport network free from flooding. Amount of heavy industry at risk of river and sea flooding should be a high priority for the region where there are long term employment issues.”*

**Question 6: “Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan?”**



**Figure 40 Northumbria responses to question 6**

This section was well understood by all who returned with over 90% stating that they understood the difference.

*“We believe the differences between the types of measures (on-going, agreed and proposed) are clearly stated within the plans.”*

*“Yes, this is well explained within the draft plan”*

Interestingly those that responded that they did not understand the measures clarified their response with the statement

*“I am able to understand this but as a public document can some of the explanations/definitions be simplified?”*

**Question 7: Across all proposed, agreed and ongoing measures, the plan describes ‘prevention’, ‘preparation’, ‘protection’ and ‘recover and review’ approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**

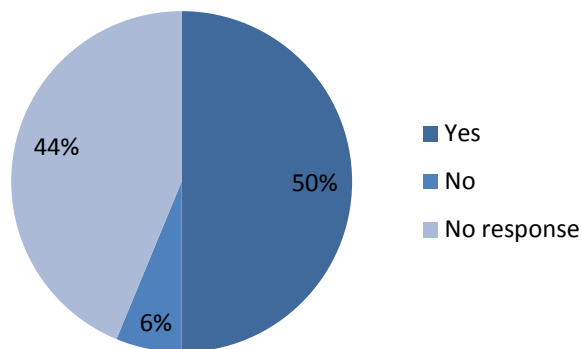
Again a largely positive response to this question with over 90 % (8) of those answering the question (9) agree that the balance between On-going and proposed actions being about right.

*“The different types of approaches to measures are clearly stated within the plans and the balance is clearly visible through the use of figures. We believe that the overall balance between Preventing, Preparing, Protecting or Recovery is appropriate.”*

Only one response suggested that the balance was not right in the plan, they provided a number of changes to measures around linking to specific locations and ongoing activities within the councils target development areas

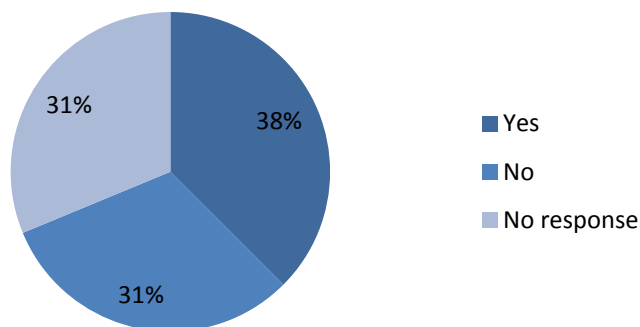
*“The draft FRMP table should be modified to highlight the partnership approach to delivery being more specific with locations”*

More linkages to partnership working and projects were encouraged in a number of responses



**Figure 41 Northumbria responses to question 7**

### Question 8: “Are there other proposed measures that should be included?”



Of those that answered this question (11) directly 54% (6) stated that there should be further measures included within the proposed measures.

Of these there were a large number of measures proposed to support additional development and strategic growth areas around the lower Tyne catchment and protection of major settlements

**Figure 42 Northumbria responses to question 8**

*“To mitigate the fluvial, surface water and tidal flood risk, the Council is proposing to deliver critical flood management infrastructure to support the regeneration of the area.” “the Council will commission consultants in 2015 to provide outline designs and project appraisals for: - tidal defences along the River Tyne...”*

*“Flood alleviation / prevention scheme for major settlements. e.g Durham City centre.”*

Another response was around the inclusion of similar measures across all catchments as outlined in the text below

*“welcomes the inclusion of an objective to protect heritage assets in the River Tees, Northumbrian, and Tyne Catchment Areas, but this objective should be applicable to all Catchment Areas and should cover all heritage asset types, whether designated or otherwise.”*

In addition to those responses, a number of measures were suggested around:

Some of the suggested comments for new measures included

- the impacts of climate change on proposed measures
- habitat improvements are incorporated within each of the proposed measures
- flash flooding should be considered when working to reduce flood risk
- dredging of silted up rivers
- working in partnership to slow the flow in upper catchments
- flood risk measures that stimulate sustainable economic growth and improve wellbeing
- policies from the proposed draft LFRMS need to be included

Finally, there were a number of updates and clarifications to existing measures suggested, this included adding a more definitive timescale for measures etc.



## Question 9: “How can you support the work set out in the draft flood risk management plan to reduce flood risk?”

Most responses included a line on how they would be able to help to support the ongoing work. It was really positive that most were keen to get more, or continue to be, involved in flood risk management. Many responses pointing to the existing partnership working which is ongoing across the main risk management authorities, but there are also requests to work closely with other organisations which responded.

*“We would welcome supporting this work.”*

*“...committed to continue to work with all partners to reduce flood risk through the Strategic Flood Management Partnerships.”*

*“Through partnership working”*

*“Through facilitation”*

*“Through close working relationships with the farming and forestry community, land managers and local parishes”*

*“can provide advice based on its involvement in many projects across the UK that are including trees among other measures to both reduce flood risk and improve the ecology of waterbodies.”*

*“We have a range of materials aimed at landowners that could be used in the Northumbria River Basin District.”*

*“Through helping local communities and farming areas become more resilient to climate change”*

*Through assisting with natural flood risk management schemes, peat projects etc, integrated with land management and stewardship”*

*“Through advising and mapping potential wetland habitat creation or floodplain woodland scheme design. . Through linking up schemes to have a bigger benefit on a landscape scale, adding value to measures”*

*The Trust is also working extensively with landowners to make the case for integrating trees and hedges into farms in order to bring multiple benefits to the landowner while also delivering water management objectives for the wider community. Finally, we may be able to provide funding both directly to landowners who are willing to plant trees on their land but also to partnership projects that wish to include trees in their plans to improve the water environment.”*

**Question 10: “Are there things you think should be done to improve co-ordination of river basin and flood risk management planning?”**

In response to this question there was resounding agreement that there needs to be better coordination between the plans. Quotes taken from the responses have been used to summarise this below:

**Table 18 Quotes summarising feedback on FRMP and RBMP co-ordination**

<p><i>The two plans should be intrinsically linked and schemes should not be brought forward which do not benefit both plans</i></p>	<p><i>“Within LLFAs the teams should be working together as outcomes can be gained from schemes under both plans.”</i></p>
<p><i>“They shouldn’t be seen as two separate activities but as partners.”</i></p>	<p><i>“Multiple agencies appear to be involved in this overall management process but their plans and objectives don’t appear to be brought together in one place.”</i></p>
<p><i>“the full integration of the flood risk management into the work of the catchment partnerships would go a long way to ensuring that all multiple benefit projects and ideas are identified at the earliest opportunity</i></p>	
<p><i>we may be missing opportunities for a partnership project to bring significant value to managing flood risk or improving water quality for example.”</i></p>	<p><i>“potential for numerous opportunities to achieve additional benefits and/or be more efficient with the use of resources”</i></p>
<p><i>there is very little evidence from the documents of a ‘joined-up approach’ between flooding and measures to improve the environmental quality of waterbodies in the region.</i></p>	
<p><i>“Consistent and thoroughness on details and understanding of the historic environment on these lines between the FRMP and RBMP would help ensure that we all work from a robust baseline of knowledge.</i></p>	

## Additional Feedback for the Northumbria River Basin District

As well as direct responses to the questions set out above, there were several responses to the consultation which were received outside of the online consultation tool. The information gathered from these respondents is summarised in this section. Some of the key themes raised were:

- more consultation with land owners and farmers
- partnership working is key to sustainable solutions
- importance of maintenance of existing defences, especially in rural areas
- clarity needed around objectives and measures
- prioritisation, timescale and location of measures needs to be clearer
- valuing Agricultural benefits higher
- food security and rural economic impacts
- importance of linked work programmes with RBMP and FRMPs
- utilisation of the catchment based approach to flood risk management
- continuing efforts to improve conveyance in conjunction with slowing flows

Some important comments from the consultation included:

*“ we caution against the recommendation of large scale re-wetting schemes without full prior consultation with landowners”*

*It is not always easy to gain a full understanding of the strategic approach to flood risk management, and its integration with other elements of environmental planning, at a catchment and sub-catchment scale.*

*There are clear benefits to be gained from co-ordinating planning processes for the more efficient delivery of a range of environmental outcomes there should be greater content and commitment relating to maximising the biodiversity benefits,*

*continued focus upon urban areas can only result in further non-residential properties and agricultural businesses being put at risk from flooding .... Further explanation would be helpful, needs to better address the socio-economic effects on the agricultural sector,*

*It is to be hoped that final FRMPs will also explicitly and positively encourage integrated, multiple-objective solutions, where appropriate, for the benefit of people, business and the environment.,*

*“very much welcome the comments on Natural Flood Management measures in the document. However, we would strongly urge that the application of these should be more ambitious in both scale and extent”*

## Consulting in the Northumbria River Basin District

Our approach to promote the consultation locally was predominately via emails and meetings with our stakeholders. While the FRMPs were mentioned by Agency staff attending many meetings and through conversations, those with key FRMP agenda items only are included in the table below. We offered specific meetings with the Risk Management Authorities, invitations were sent by email and followed up by phone calls. A number of these did make appointments and local meeting were carried out.

In addition, Flood Risk Staff attended and facilitated a number of joint FRMP / RBMP workshops to target the environmental bodies, these were very successful in drawing responses from key organisations in the area.

In total we attended 11 meetings and 2 workshops to encourage feedback on the consultation.

**Table 19 High level summary of engagement Northumbria RBD**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	11	RFCC – LLFA councillors and Officers, Water Company, NGOs, Northumberland Strategic Flood Group, Tees Valley Strategic Flood Group, Durham Strategic Flood Group, Northumberland River Basin Liaison Panel, Cross Border Advisory Group – Including LLFAs and SEPA, Northumberland County Council, Northumbrian Water, Tyne and Wear Strategic Flood Group, South Tyneside Council, Stockton Borough Council.
<b>Workshop</b>	2	RBMP / FRMP Workshop, Natural England.
<b>Email</b>	multiple	Lead local flood authorities, key stakeholders.
<b>Briefing</b>	2	RFCC – LLFA councillors and Officers, Water Company, NGOs, RFCC Update to LLFA Members.

### 3.6. Severn River Basin District

The Severn River Basin District (RBD) covers an area of just over 21,500 km<sup>2</sup>; it comprises uplands, valleys, and floodplains, urban and agricultural areas. The River Severn is the longest river in Britain, stretching 350km from its source to the mouth of the Bristol Channel. The sheer size of the RBD gives rise to a huge variety of characteristics, such as land use, geology and topography. It has a varied landscape from the uplands of Wales, down through valleys and rolling hills through central England, to the lowlands and the Severn Estuary.

The RBD includes the River Severn and its main tributaries, the Warwickshire Avon and the Teme. It also incorporates the rivers of South East Wales, including the Wye, Usk and Taff, and rivers of the South West that drain directly into the Severn Estuary, like the Bristol Avon. Much of the RBD is rural, with land managed for agriculture and forestry. It is also characterised by urban centres that are built along the main rivers, such as Worcester, Gloucester, Newport and Bristol. These population centres vary from small to medium in the upper catchments to large urban and sub-urban areas in the lower flatter floodplains.

Consultation responses were submitted via email, post or using an online 'e-consultation' tool provided by the Environment Agency. The majority of responders did not raise any issues with the e-consultation tool. Two responders highlighted technical difficulties and that as a method of consultation it may not be inclusive for everyone who may wish to comment.

A total of 30 responses were received in England during the consultation for the Severn River Basin Flood Risk Management Plan (FRMP). These included different organisations, groups and individuals. This report summarises the main points raised. The highest number of responses came from local government and environment management and non-governmental organisations (NGO's). Natural Resources Wales has produced its own consultation response document which is available using the following link:

<http://naturalresources.wales/media/4408/dfrmp-consultation-response.pdf>

Most of the responders offered constructive suggestions as to how the final FRMP could be improved. A number of comments highlighted the need to work in partnership to achieve the objectives of the FRMP. Many responders felt that in order to make effective plans to manage flood risk, all sources of flooding need to be addressed together in a single plan, and that this should consider surface water, groundwater and sewer flooding. About one third of responders commented that more detailed information and greater clarity would have helped them in their response.

The word diagram (wordle) below illustrates some of the key themes that were raised in the responses. This wordle was included to highlight the themes in a visual way. The most common themes discussed in the responses appear larger within the wordle.



Feedback was received from the following groups:

**Table 20 breakdown of responses by organisation type Severn RBD (English side)**

Organisation Type	%	Number of Responses
Individual	14	4
Environment management (including NGOs)	23	7
Farming/land management	7	2
Government, local	30	9
Other	13	4
Leisure / tourism	3	1
Business/commerce	3	1
Utilities	7	2
Total		16

## Summary of consultation feedback

The following pages summarise for each questions the general themes emerging from an analysis of all the responses and highlights areas that will be taken into consideration for the final FRMP

### Question 1: “Do you agree that this draft plan sets out the most significant flood risk issues for your area? If not, please explain what you think is missing.”

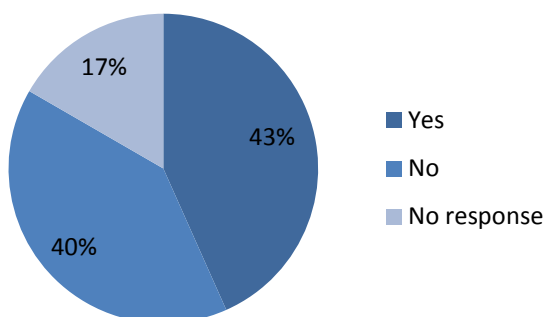


Figure 43 Severn responses to question 1

Response to this question indicated that there was no clear agreement that the draft FRMP set out the most significant flood risk issues, with an almost equal split between ‘yes’ and ‘no’. The majority of responders that indicated ‘yes’ were from the environmental management sector (including NGO’s), followed by local government and individuals. Responders that indicated ‘no’ came from a range of sectors. They commented that the plan did not address the most significant flood risk issues for their area. Common themes which they felt were missing included:

- sewer, surface water and groundwater flooding
- local Flood Risk Management Strategy information
- managing the catchment
- important not to underestimate the economic value of farmland
- funding of infrastructure
- development pressures
- risk from smaller, fast reacting catchments
- the full extent of climate change challenges

One responder suggested that climate change presents a significant challenge for future flood risk management and the sustainability of existing approaches.

Responders highlighted that to gain a true reflection of the most significant flood risk issues, the document should include adequate information on flood risk from sewer, surface water and groundwater flooding. Responders wanted to know if the scope of the plan should include sewer flooding.

It was suggested that understanding risk from all sources could prompt working in partnership to reduce flood risk. A responder stated;

*“Where flooding mechanisms are caused by sources that have multiple RMA responsibility, we aim to work in partnership with the relevant RMA to reduce flooding probability.”*

Some responders expressed the need for the FRMP to be in line with the objectives of the Local Flood Risk Management Strategies.

Some commented that more emphasis could be placed on catchment management and smaller, fast reacting catchments;

*“Smaller fast-reacting catchments have significant flood risk and safety implications which are often overlooked”*

## Question 2: “What do you consider to be the highest priorities for managing the risk of flooding in your area?”

Many of the responders focused comments on flood risk management priorities, according to their particular objectives and geography. These are summarised below:

- partnership working
- community engagement
- catchment based approaches
- surface water, groundwater and sewer flooding
- managing flood risk over the long term, taking account of climate change
- managing and reducing the impacts of flooding
- funding for the maintenance of flood defence assets
- conservation and enhancement of the historic environment
- development control
- sustainable drainage

A common theme of the consultation responses was partnership working to manage flood risk. It was suggested that it is a key priority for organisations responsible for flood risk management to take a ‘joined-up’ approach to reduce the risk of combined sources of flooding. One individual stated that their number one priority was;

*“Partnership / multi-agency working and good sharing of information / data / knowledge between organisations”*

Responders highlighted the need to manage the impacts and duration of flooding, focusing on areas of high population and those that are regularly flooded.

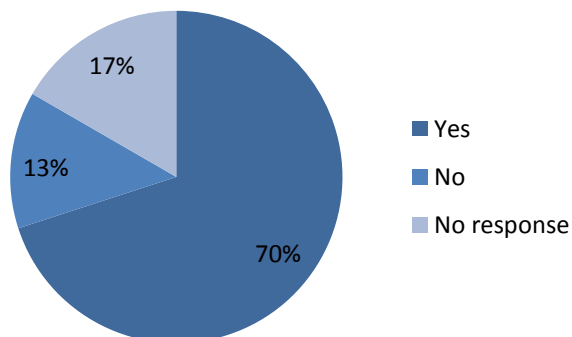
*“Addressing the management needs of regularly flooded communities, engineered solutions at local scale, mitigating the impact and reducing the duration of flooding”*

Overall, most responders commented that there was no clear priority for managing flood risk in an area. One environment management responder summarised that priorities should be;

*“A combination of flood defence alongside economic, social and environmental services working in harmony together, rather than one aspect reducing the benefit of the others.”*



**Question 3: “Do you understand the objectives as described in the draft plan? If not, what would help you understand them better?”**



**Figure 44 Severn responses to question 3**

The vast majority of responders indicated ‘yes’ they understood the objectives within the draft plan. The majority that indicated ‘yes’ were from local government or environment management sectors, with also a few individuals. Those that indicated ‘no’ were evenly distributed between individuals and environment management responders.

Two responders felt the layout of the objectives was confusing because some objectives were repeated at different levels of the FRMP. It was suggested that understanding could be improved if there were clear links between the objectives at both the catchment and river basin

district scales. It was commented that not all objectives were divided into social, economic and environmental categories.

*“We recommend making clear links between the objectives at the different scales, since we found there were some duplications, overlaps and repeated objectives”*

One responder from the environment management sector commented on the high volume of objectives. Another responder from the same sector stated that section 9 of the draft FRMP was useful as it provided a summary of the objectives for the river basin and it was simple and easy to understand.

Two responders commented on the historic environment objectives and felt that these were inconsistent in some of the catchments, and should be given a stronger weighting. One responder from the national government sector commented that the historic environment objective required further detail/clarification;

*“While there is an objective relating to the historic environment in both the main report (Section 9) and the individual Catchments, it only refers to some designated heritage assets and also confusingly refers to landscape value (when landscape merits a separate objective)”*

One responder commented that there should be more effective links between the objectives of the FRMP and the objectives of the River Basin Management Plan (RBMP).

#### Question 4: “Is the balance right between the ‘social’, ‘economic’ and ‘environmental’ objectives, as explained in the draft plan? If not, what would you change and why?”

Some responders commented that they could not easily decide whether the balance was right in the plan because not all the objectives were divided into economic, social and environmental categories.

*“The contribution of each of the plan objectives towards social, economic and environmental goals is not explained; therefore the balance is not explained”*

There were conflicting opinions from those who commented on how highly prioritised economic objectives should be placed.

Responders suggested adjusting some of the objectives of the FRMP, such as:

- higher weighting for environmental objectives
- higher weighting for agricultural land
- more focus on preparing communities for flooding
- more social objectives
- more rural/natural land use solutions

One responder from the farming sector commented:

*“The management of the environment underpins our social and economic wellbeing. The focus should be on delivering resilient and prepared communities that understand the importance of good (and innovative) land and water management for percolation and attenuation that benefit of people, wildlife and the economy.”*

Some responders indicated that objectives should have an equal weighting. One environment management responder commented that measures can and should deliver benefits for the economy, environment and society, and that measures that benefit all three need to be prioritised.

Responses to this question indicated a consensus that multiple objectives need to be considered together in order for objectives and flood risk management to be successful. A number of responders highlighted that working in partnership with other organisations would provide the most benefit for all the objectives.

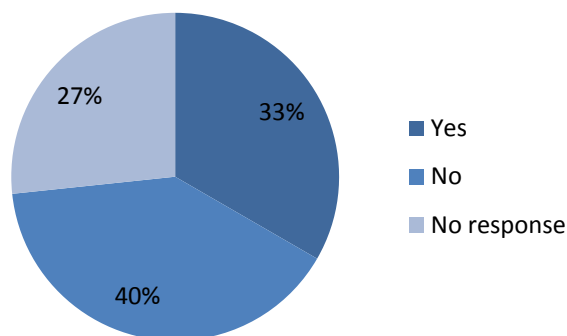
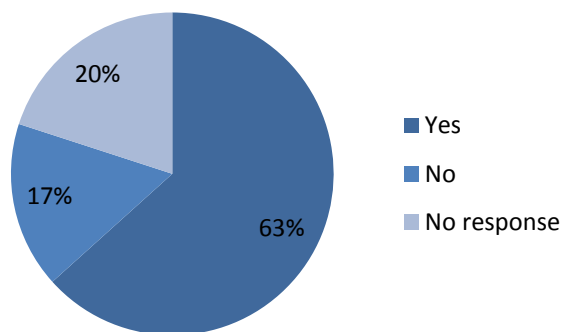


Figure 45 Severn responses to question 4

**Question 5: “Are there other flood risk management objectives that should be included? If so, please explain what they are and why they should be included?”**

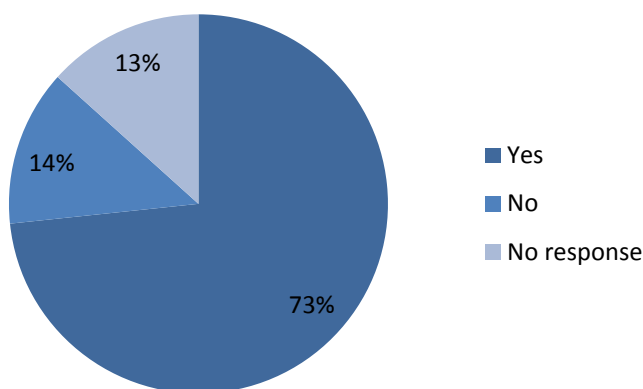
A large majority of responders, particularly from the environment management and local government sectors, indicated ‘yes’ to this question. The key themes for other or extended objectives are summarised below;

- rural sustainable drainage, including upland catchment management
- sewer flooding to be included within the scope of the plan
- reduction of flood duration
- mitigation of impacts of climate change
- providing help and assistance for vulnerable people
- recognising and prioritising, within Treasury rules and guidance, the value of agriculture to the national economy and food security.
- protecting heritage sites
- preventing economic damages due to loss of tourism
- surface water management
- recognition of internal drainage board work
- greater emphasis on community engagement and partnership working
- more overarching objective to cover environmental objectives (e.g. woodland creation)
- improve wording on sustainable development and how it can be encouraged.



**Figure 46 Severn responses to question 5**

**Question 6: “Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan? If not, what would help you understand them better?”**



A large majority of responders indicated ‘yes’ to this question. Those who indicated ‘yes’ were predominately made up of the Environmental management (including NGO’s) and Business sectors. Responders commented that the explanation of measures was clear and well illustrated in the diagrams within the FRMP.

Responders who answered ‘no’ to this question commented that more clarity was needed on the detail and the timescales of the measures. One responder commented that it was

**Figure 47 Severn responses to question 6**

important for 'agreed' measures to:

*“give stakeholders an idea when measures might be undertaken”*

Several of these responders highlighted that more clarity is needed in respect of the different terms and the criteria which distinguish the 'level' of measure (i.e. the difference between 'Proposed' and 'Agreed')

Another key observation raised by a responder from the Business sector was that there were generally not many 'new measures'; much of the commentary was about reinforcing existing 'agreed' or 'ongoing' measures. Although there was much detail in the draft FRMP, it seemed to focus predominantly on consolidating information, rather than proposing new measures (Source: Business).

**Question 7: Across all proposed, agreed and ongoing measures, the plan describes 'prevention', 'preparation', 'protection' and 'recover and review' approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**

Over half of the responders felt the balance wasn't right between the different types of approach. The majority of those were individuals or consultants from environmental management organisations, including NGO's.

Several of the responders commented that there was a lack of emphasis in the 'Preventing risk' category. One specifically stressing the need for

*“..stronger development control in areas where groundwater levels cause inundation of sewers and subsequent flooding”*

A responder from the environmental management (including NGO's) sector commented that there should be more measures at the catchment scale, taking a holistic approach to reap the benefits of natural flood management;

*“..Natural flood management measures should be more rapidly investigated and more widely rolled out, wherever they provide a better environmental, societal and economic option.”*

The draft FRMP indicates measures according to type (e.g. preventing, preparing, protecting, recovery and review) and status (agreed, on-going, proposed). Responders commented that it would be beneficial to indicate how these measures would result in the FRMP objectives being achieved. A responder from the environment management sector commented that it would be beneficial for the FRMP to contain some summary information about the number and relative priority of measures in these different categories at RBD scale.

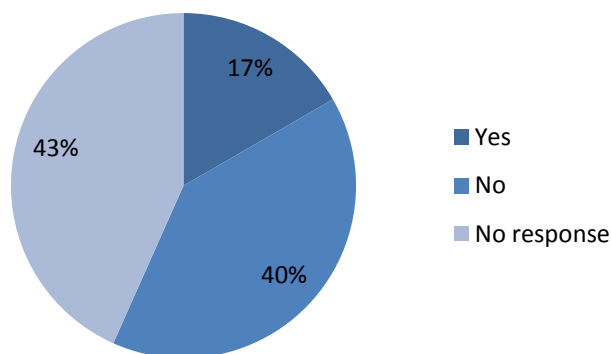
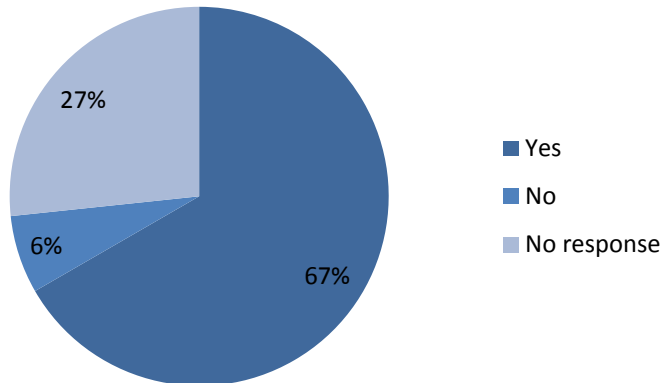


Figure 48 Severn responses to question 7

**Question 8: “Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included.”**



**Figure 49 Severn responses to question 8**

The vast majority of responders indicated ‘yes’ to this question. A key theme raised in the responses was the need for measures to support partnership working. It was suggested that the measures could be expanded to include those of the Lead Local Flood Authorities’ (LLFAs).

It was suggested that other measures should be included in connection with:

- opportunities for Natural Flood Risk Management
- adding surface water flooding

and sewer flooding to the table of measures

- improvements in the Forecasting/Flood Warning service
- tidal lagoons considered as an option for managing flood and coastal risk
- more emphasis on reducing flood risk to World Heritage Site City of Bath in this area
- maintenance of existing flood risk management assets
- utility company led flood risk management projects
- increased emphasis on community emergency plans, including areas not in rapidly responding catchments
- surveying the whole water body on foot to look for local cost effective interventions (e.g. impediments to flow, land management and attenuation opportunities) as part of the funding and proposals process of investment in flood infrastructure

It was commented that measures should be integrated with Water Framework Directive (WFD) measures

**Question 9: “How can you support the work set out in the draft flood risk management plan to reduce flood risk?”**

Responses to this question highlighted the many different ways in which the majority of responders felt they could positively support the draft plan. Below summarises a selection of quotes. The main theme was partnership working across all interested parties to reduce flood risk, and sharing data and knowledge:

*“..We will continue to engage with other partner organisations and community groups/individuals, whilst sharing any relevant data we hold which will be of use for reducing the risk of flooding to communities”*

*“..Gloucestershire CC will continue to work closely with the Environment Agency, its other partners and with local communities to manage local flood risk. The County Council will fulfil its role as the*

*Lead Local Flood Authority and has set out how this will be achieved in the publication in 2014 of a Local Flood Risk Management Strategy”*

*“...can provide advice based on its involvement in many projects across the UK that are including trees among other measures to both reduce flood risk and improve the ecology of water bodies”*

*“...Continuing support and involvement in the Rural SuDS pilot in the Stroud Valleys Involvement in future Rural Suds schemes...”*

*“...Our AMP 6 Business Plan includes a measure to deliver 21 partnership schemes to reduce flood risk with partners such as Risk Management Authorities – providing an opportunity to work in partnership to deliver flood risk protection and prevention measures that deliver the objectives set out in this FRMP...”*

*“..work in partnership with the relevant RMA to reduce flooding probability...”*

*“...to support projects within the plan through the new Countryside Stewardship schemes where activities have clear biodiversity or WFD benefits and they are within targets areas”*

*“Support our neighbouring LLFA’s in completing the actions within the Bristol Flood Risk Area”*

### **Question 10: “Are there things you think should be done to improve co-ordination of river basin and flood risk management planning?”**

The majority of responders highlighted the need to improve coordination of river basin and flood risk management planning. In particular, there were recurring comments from a number of environmental management (including NGOs) and local government responders to increase/improve links between the FRMPs and RBMPs. Several of the responders suggested that the FRMP and RBMP should be combined in one single plan.

*“..We welcome efforts to align the FRMP consultation with the River Basin Management Plan consultation, and suggest in the future there may be benefit in further integrating the two.”*

*“..The linkages between the environmental objectives of the Flood Risk Management Plans and those of the Water Framework Directive should be made clearer, encouraging stakeholders to think about the synergies between the two areas of work, thus promoting a more holistic consideration of water management”*

There was also a general concern from a number of environmental management and local government responders that WFD measures were not sufficiently highlighted throughout the FRMP, and that information was vague where they were mentioned. It was suggested that more clarity is needed within the FRMP where projects consider FRMP and RBMP/WFD together.

Another theme that was highlighted in the responses was the need to make full use of existing partnerships to increase engagement and partnership working both at a catchment and local scale to improve coordination, and further that;

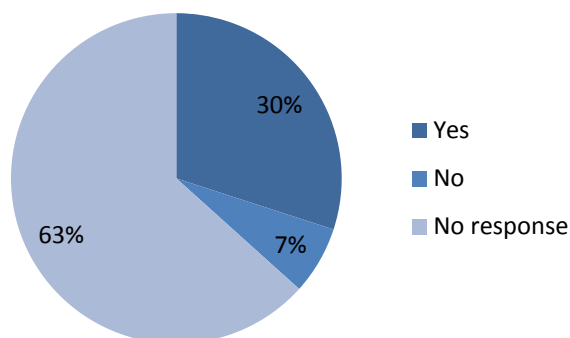
*“..Closer working relationships between teams delivering flood risk management and WFD actions need to be formalised, with the benefits that schemes can bring for WFD/RBMP actions considered and monetised more stringently”*

It was suggested that greater clarity is needed as to how responsibilities are divided between the Environment Agency and LLFAs to prevent duplication of effort.

One responder from the environment management sector suggested the creation of a project register of particularly small, non- cost beneficial projects that could be used by others to achieve additional benefits. There would also be more potential to combine sources of funding for projects.

**Question 11: “We have proposed a change to the boundary between the Severn and South West river basin districts. Do you agree this proposed change should be adopted in the final plan? If not, please explain why.”**

The majority of consultation responders who indicated ‘yes’ to this question were from the local government sector, followed by environment management (including NGO’s), the business/commerce sector and individuals. Two responders commented that the FRMP was unclear about what change to the RBD boundary was proposed.



**Figure 50 Severn responses to question 11**

One responding utility company answered ‘no’ to this question. They commented that the whole of the Bristol Avon and

North Somerset Streams catchment should also move into the South West River Basin District because there are no hydrological or environmental connections between the Bristol Avon catchment and the rest of the Severn River Basin District. In addition, the responder commented:

*“The existing administrative boundary of the Environment Agency lends weight to the argument that it would be more cost efficient to align the river basins with geographical areas of responsibility.”*

## Additional feedback for the Severn River Basin District

There were a number of other comments made in the consultation. These are summarised below;

**Table 21 Additional feedback for the Severn RBD**

Further comments were received relating to objectives and measures as follows:	
Comments made	Source (Sector)
Supportive of the draft and FRMP objectives. [ <i>Name Removed</i> ] to continue working in partnership to aid plan delivery.	Environment management (including NGO's)
The objective "Encourage a more natural management of the river and its floodplain to help deliver WFD target of good ecological status" (Table 9.1). This objective must be balanced with the landowners need to retain drainage capacity of the land, manage drainage infrastructure and produce food profitably.	Environment management (including NGO's)
Identify opportunities for floodplain restoration - any measures undertaken must be via full consultation and an agreement with the landowner.	
Ensure a robust revenue maintenance programme exists	
There should not be an automatic presumption that agricultural land can be sacrificed for flood storage.	
Policy and practices must find resilient ways of managing flood risk which defend life, property and farmlands.	
Identify other Government policy objectives and resulting actions that could contribute to the management of flood and coastal risk.	Environment management (including NGO's)
Ensure there are sustainable and deliverable options to manage flood risk and coastal management over the longer term	
Further clarity needed of the relationship between the FRMP table of measures and the capital investment programme, indicating which have secured funding for the next 6 year period.	Environmental management (including NGO's)
Suggest using the measures in the FRMP or capital programme, through river and coastal measures, to contribute to the Governments Biodiversity 2020 targets	
Unclear how measures are going to help to meet objectives, especially the environmental objectives (e.g. Improving the hydro-morphology of rivers)	Government, Local
Potential schemes for the future were not mentioned in the measures list	



**Further comments were received relating to objectives and measures as follows:**

Comments made	Source (Sector)
Concern for the vulnerability of heritage assets and the impact flood risk management measures have on heritage assets and their setting and concern that this hasn't been considered throughout the plan. Commented that flood risk management should positively boost the heritage environment.	Government, National
Concern that the plan hasn't used the correct definition of what cultural heritage means. Suggested this definition should then be used to create a standard heritage focused objective for each catchment – promoting the reduction of adverse effects of flooding, but also minimise harm to heritage assets caused by flood prevention measures.	Individual Government, Local
[Name removed] feel that measures should consider the heritage value of AONB areas, consider conservation status/listed building/conservation area status.	
[Name removed] felt that there were positive policies with regards to development, which could be rolled out to other local authorities.	
All the catchment partnerships to have seen and agreed these measures prior to inclusion in the final FRMP in order to ensure integration with WFD work	
It is important that any measures/actions avoid having a detrimental impact on protected landscapes, fulfil the policies of the statutory management plans and make a positive contribution to the environment	
There are a range of objectives that the plan is trying to achieve but it is unclear how the list of measure in the plan is contributing to these...we suggest that for each measure in the plan, a clear indication of which of the environmental (and other) objectives are going to be met by the activity is given	Government, Local
Develop wording of objectives/measures to describe how sustainable development can be encouraged as well as, or instead of, preventing inappropriate development	Government, Local
Delivery of measures needs to consider how multiple benefits can be optimised to deliver overall cost efficiency savings as well as benefits to people and wildlife	Environment Management

**Further explanation/clarity was sought as follows:**

<b>Comments made</b>	<b>Source (Sector)</b>
Clarity as to who is managing which issues of flood risk, and the timescales involved.	Community Group
Being clear on what economic resources are available and what engineering solutions are applicable and reasons why, or why not, in what timescales.	
A responder felt the plan should explain how funding from central government is allocated between main river, ordinary watercourse, surface water and ground water	Government, Local
Consider additional explanation of the increased risk from climate change. Thus the extent of the challenge for flood risk management planning into the future and sustainability of existing approaches	Environment management (including NGO's)
The Plan needs to be clearer with respect to its facilitation of growth, particularly in the Enterprise Zones/Areas across the region.	Government, Local

**Other comments regarding the plan were received as follows:**

<b>Comments made</b>	<b>Source (Sector)</b>
Improve co-ordination between all bodies, including LLFAs , in contributing to the FRMP	Environment management (including NGO's)
The downstream impacts of large new urban development's should be recognised, highlighting the importance to value and maintain our existing (SuDs) drainage infrastructure	
Encourage innovative approaches that can assist flood risk and coastal management (e.g. research, engagement with private sector)	Environment management (including NGO's)
Identifying challenges to delivery and potential routes for resolution e.g. WFD, funding options, partnerships/governance etc.	
[name removed] stated that it was not clear if the Nutrient Management plans and River Restoration plans (jointly developed between Natural England and Environment agency) have been taken into account in this plan.	Government, National
Believe the FRMP and RBMP don't have consistent and thorough details/understanding of the historical environment.	
Difficult to gain a full understanding of the strategic approach to FRM, and its integration with other elements of environmental planning at a catchment and sub-catchment scale.	Environmental management (including NGO's)

**The following comments were received relating to how flood risk should be managed:**

<b>Comments made</b>	<b>Source (Sector)</b>
Learn from Flood Events – to improve and develop services based on feedback from communities and partners. Supplement reliance on modelling with anecdotal evidence and local knowledge	Environment management (including NGO's)
Increase awareness of Riparian Responsibilities	
Suggest a review of maintenance responsibility, in particular the complexity of consenting and cost effective option for land owners to complete work themselves with EA/Local flood risk authority backing	
It is vital that adequate water resources and drainage capacity is available to cope with any new demands placed on the county's natural infrastructure e.g. flash flooding and high peak flows	
Community flood plans should consider the role of the historic environment.	Environment management (including NGO's)

**The following comments were received relating to further discussion/ partnership working:**

<b>Comments made</b>	<b>Source (Sector)</b>
Suggest using the FRMPs as a starting point to continue discussion between the Environment Agency, LLFA's and [name removed] at strategic and local level.	Government, National
[name removed] would welcome more information and detail on partnership working and heritage assets	
Would like to be consulted on for key conservation areas mentioned in the plan	
Positive policies with regards to development, which could be rolled out to other local authorities.	Environmental management (including NGO's)

**The following concerns were raised:**

<b>Comments made</b>	<b>Source (Sector)</b>
Concern over the financial implications of lost agricultural land	Environment management (including NGO's)
Food security is a key concern	
Concern that CFMP's may be phased out	Environmental management (including NGO's)

## Consulting In the Severn River Basin District

The Environment Agency approach to promoting the consultation locally was predominantly via meetings and emails with stakeholders in the RBD. Environment Agency staff involved in meetings with stakeholder groups and partners shared information across 13 meetings and 2 workshops to highlight and discuss the consultation. Emails and social media were also used as a form of stakeholder engagement. Information was shared with the River Basin Management Plan consultation, and where possible, joint consultation events were carried out.

**Table 22 High level summary of engagement Severn RBD**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	13	Local government, Regional Flood Coastal Committee, individual, farming/land management
<b>Briefing Emails</b>	3	Environment Agency, Local Government, MP's/ MEP's, Environment management (including NGO's), utilities, RFCC, national organisations representing parishes, farm/land management, Local Resilience Forums, Local Enterprise Partnerships, government national (including agencies), academia, transport/navigation, leisure/tourism, local community groups.
<b>Email</b>	6	Utilities, individual, national government, environment management (including NGO's)
<b>Social Media</b>	2	Multi-sector
<b>Workshop</b>	2	Individual, transport/navigation, farming/land management, utilities, leisure/tourism, environment management (including NGO's), local government, consultant/contractor
<b>Newsletter</b>	1	Multi-sector

### 3.7. Solway Tweed River Basin District

The Solway Tweed river basin district (RBD) covers from Cumbria in the west to Northumberland in the east and southern Scotland to the north. There was a good spread of responses from different organisations including the general public, local government, leisure/tourism and farming/land management.

18 responses were received for the Solway Tweed RBD (English section). The level of detail in the responses to the consultation questions varied with individuals tending to respond to one or two questions whilst organisations gave comprehensive thoughts on all the questions. Many consultees felt the highest priority for managing the risk of flooding should be focused around the protection of people, property and critical infrastructure.

A clear issue that emerged was that a Catchment Based Approach (CaBA) should be identified explicitly in the objectives and each catchment should identify which CaBA partnership it will work with.

Other recurring themes from respondents included partnership working, the role and importance of maintenance and linking FRMP's with local flood risk management strategies and the national FCRM strategy. The word diagram below illustrates more of the key themes that were raised in the responses.



Feedback was received from the following groups

**Table 23 Breakdown of responses by organisation type Solway Tweed RBD**

<b>Organisation Type</b>	<b>%</b>	<b>Number of responses</b>
<b>Individual</b>	11.11	2
<b>Environment Management (including NGO's)</b>	16.66	3
<b>Utilities</b>	11.11	2
<b>Government, local</b>	22.22	4
<b>Government, national</b>	5.55	1
<b>Leisure/Tourism</b>	11.11	2
<b>Farming/Land Management</b>	5.55	1
<b>Other</b>	16.66	3
<b>Total</b>		<b>18</b>

## Summary of consultation feedback

The following pages summarise for each question the general themes emerging from the consultation and highlights areas that are being taken into consideration for the final FRMP.

### Question 1: “Do you agree that this draft plan sets out the most significant flood risk issues for your area? If not, please explain what you think is missing.”

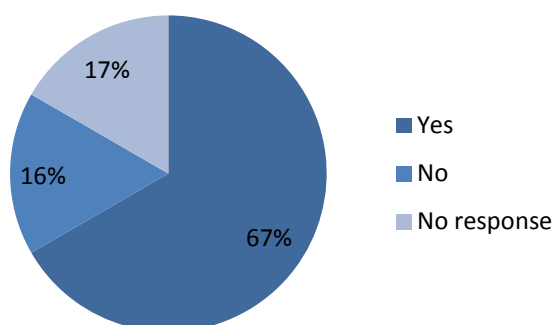


Figure 51 Solway Tweed responses to question 1

A significant number (67%) of responses to this question agreed that the draft plan identified the most significant flood risk issues for them. Some respondents identified areas we may need to consider in the plan, including the potential impact of climate change on the recreational boating sector, with increased storminess, less suitable conditions and increased damage to coastal facilities.

Three respondents felt that the plan did not consider the requirements from all types of flooding:

- Consider flooding from main rivers and reservoirs in an integrated way with flooding from other watercourses and surface water flooding.
- The plan does not reflect any significant flood risk issues associated with assets not covered by the requirements of the plan such as sewers and water mains or reflect data that was not assessed in development of the plan.
- Coastal flood risk is not adequately considered in the draft FRMPs. The FRMPs do not include, or explicitly relate to the policies and actions in Shoreline Management Plans.

A number of other respondents highlighted that more partnership, co-ordination, joint working and knowledge exchange was required to ensure the delivery of measures within the plan.

*“There is a need to consider cross-boundary partnership with SEPA in Scotland”*

*“More use of external specialists in providing training to multiple disciplines within the EA (rather than training provision within single discipline groups)”*

One respondent felt that much greater use should be made of existing ecological and geomorphological scientific knowledge in the design and delivery of measures designed to mitigate flood risk.

## Question 2: “What do you consider to be the highest priorities for managing the risk of flooding in your area?”

The most common priority across consultation comments was the protection of people, property and infrastructure from flooding.

*“Protect and Prevent are the two top priorities for all catchments. Protection is necessary in the short term and Prevention brings longer term sustainability and has the potential to bring significant other benefits into the catchment”*

*“The highest priorities for managing flood risk should be focused around the protection of people, property and critical infrastructure”*

*“Reduce flood risk to people and property. Manage flood risk through protecting and restoring the natural function of the catchment, rivers and floodplain. Working in partnership to achieve these aims.”*

North Yorkshire Local Authority has identified the following in their Local Flood Risk Strategy:

- a greater role for communities in managing flood risk.
- improved knowledge and understanding of flood risk and management responsibilities amongst partners, stakeholders, communities and the media.
- sustainable and appropriate development utilising sustainable drainage where ever possible.
- improved knowledge of watercourse network and drainage infrastructure.
- flood risk management measures that deliver social, economic and environmental benefits.
- best use of all potential funding opportunities to deliver flood risk management measures.

The Cumbria Local Flood Risk Management Strategy identified the following 5 Policy Objectives:

- reduction in flood risk to the people of Cumbria.
- increased knowledge and awareness of the factors affecting flood risk across Cumbria.
- ensure that flood risk management is integrated within the planning process in Cumbria.
- facilitate close partnership working between all risk management authorities.
- improve Community Resilience through awareness of flood risk.

Other themes raised were as follows:

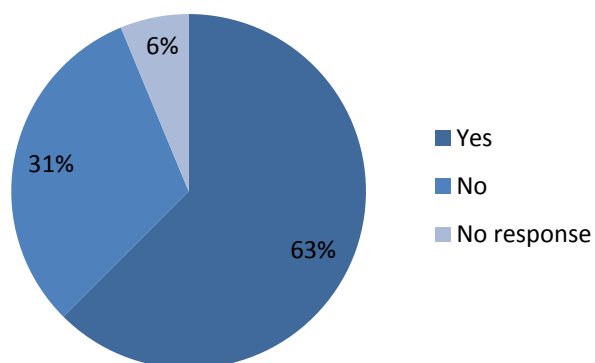
- SEPA wished to reinforce the need to continue to work together, in conjunction with the Cross Border Advisory Group, to ensure that no impacts from actions outlined in the FRMPs adversely impact Scotland or elsewhere.
- other priorities raised included dealing with existing inadequate drainage systems, high quality habitat and wildlife, land drainage and the implications of increased forestry cover.

*“Dealing with existing drainage systems, which are inadequate and the problem of not considering the land drainage natural or manmade on development sites.”*

*“The risks to communities and helping those people with resilience. The risks of food protection and the rural economy. The risks of high quality habitat and wildlife and heritage sites. The implications of increased forestry cover on flood risk for communities lower down the catchment.”*



**Question 3: “Do you understand the objectives as described in the draft plan? If not, what would help you understand them better?”**



**Figure 52 Solway Tweed responses to question 3**

The majority of the respondents (63%) understood the objectives as described in the draft plan. The general consensus of those who answered yes was that objectives were easy to understand. However, a number of comments were expanded upon to make the following points:

Some respondents felt that there needed to be more mention of partnership work and the Catchment Based Approach (CABA).

*“More mention of partnership work and the Catchment Based Approach (and other partnerships) could be embedded in the objectives, throughout the document.”*

*“It is important that the CaBA partnerships within each flood risk plan are explicitly identified in the objectives in the sections on 'Social' and 'Environmental' benefits.”*

A number of respondents were concerned that objectives in the draft FRMP do not link specifically with flood risk management strategies at a local level and felt the connection between national and local strategies should be clearer. Further to this, it was also highlighted that the links between the Flood Risk Management Plans and investment planning for flood risk management are not yet clearly defined enough.

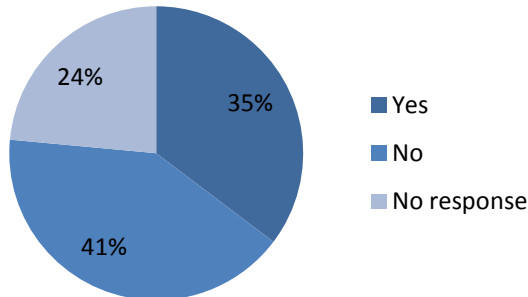
*“The FRMPs should link together local strategies to provide a much clearer connection between local flood risk management strategies and the national FCRM strategy and provide the basis for partnership working.”*

*“The draft FRMP objectives do not link explicitly with local flood risk management strategies developed by risk management authorities”*

The responses that answered no to this question suggested a number of factors that hindered understanding. These include:

- there appear to be several sets of objectives under the headings of Social, Economic and Environmental within the plan.
- there appear to be differences between the statements in Sections 9, 10 and 11 and it is therefore not clear which, if any, should have priority.
- we remain unclear as to why some of the objectives have been highlighted as being specifically linked to United Utilities while those of other Risk Management Authorities have not been highlighted in the same manner. We would expect there to be consistency in the objectives throughout the plan and for them to be attributed in a similar way.

**Question 4: “Is the balance right between the ‘social’, ‘economic’ and ‘environmental’ objectives, as explained in the draft plan? If not, what would you change and why?”**



A slight majority (41%) of respondents didn't agree that the balance between the social, economic and environmental objectives as explained in the draft plan was correct. Concerns were expressed about the following.

Social should have the highest priority but consider that the environmental and economic objectives should be roughly equal. This will make the plans more sustainable in the long term.

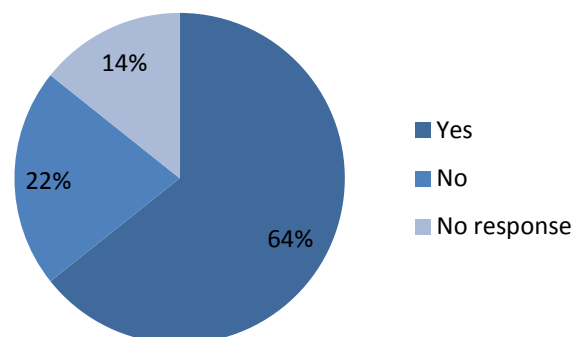
**Figure 53 Solway Tweed responses to question 4**

- Unable to identify any section within the plan that states what the balance is between the three objective areas of social, economic and environmental, it is also unclear how the balance has been applied.
- Whilst objectives to improve all 3 should be included, it isn't possible to judge this as any objective that improves one theme can also have an effect on one or both of the others, either positively or negatively.
- It would be useful to include known locations of key species, such as freshwater pearl mussel and crayfish.
- For both the Tyne and Northumberland Rivers, the conclusions / objectives mentioned using flood risk management to enhance the landscape, yet this idea was not taken forward into the table of measures.
- It is vital that we make full use of our amenity areas and maintain and plan them with flood risk in mind.

**Question 5: “Are there other flood risk management objectives that should be included? If so, please explain what they are and why they should be included?”**

The majority of respondents (64%) felt there were more flood risk management objectives that needed inclusion in the plans. Some of respondents suggested objectives were:

- flows need to be carefully managed so as not to effect other aspects of the river
- working with the CaBA partnerships should be explicitly identified as an objective
- it is unclear on the balance that has been applied between the objectives
- community involvement in preparing rapid response action plans
- monitoring is required at a local level to better understand flash flood events



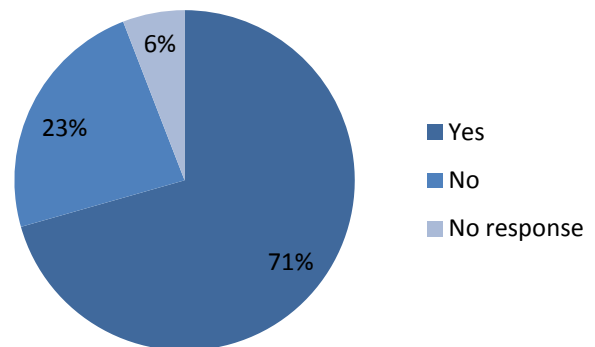
**Figure 54 Solway Tweed responses to question 5**

- no clear measures in the table to work on the Coquet or in the Rothbury area
- more monitoring in the uplands, especially for sediment
- more information on the monitoring and evaluation of natural flood risk management techniques
- there is potential for multiple benefits from working together with Natural England and the Forestry Commission. Land management is a key part to a holistic river system. Partnership with these bodies should also be mentioned in the documents
- some of the releases from the reservoirs could be re-examined, in the summers especially, to ensure the oxygen levels in rivers for fish
- need to carefully consider the species and density and size / location of woodland in order to have the best multiple benefits
- with regard to upland peat works and grip blocking or re-profiling, there are not only benefits for controlling sudden runoff, but also sediment retention and water colour
- when removing weirs for fish and eel passages, there may be a need to consider first the possibilities of micro-hydro power generation possibilities
- opportunity for local stakeholder and national specialist consultation/approval based on presentation of evidence for individual measures (as a minimum where negative environmental impacts are anticipated i.e. obligatory for proposed dredging activities)
- establishment and commitment in advance to consistent approach to flood risk management irrespective of current/recent flood
- develop objectives that are specific to different scales of catchment i.e. measures to control urban surface water runoff at property, neighbourhood and watershed scales
- instigate schemes that encourage/enable individuals, communities, businesses and local government to install and enact those measures at each scale.
- the plan currently indicated that surface water only affects urban areas, this should be changed to show how it affects rural communities

**Question 6: “Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan? If not, what would help you understand them better?”**

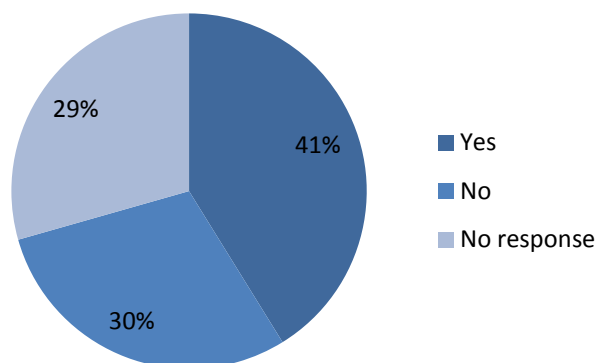
The majority of respondents (71%) understood the difference between on-going, agreed and proposed measures, as explained in the draft plan. There was only one detailed response to this question which was to:

- clarify whether the Ongoing and Agreed measures will be subject to review by the community to identify whether they are still a priority?



**Figure 55 Solway Tweed responses to question 6**

**Question 7: “Across all proposed, agreed and ongoing measures, the plan describes ‘prevention’, ‘preparation’, ‘protection’ and ‘recover and review’ approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**



Around 71% of the consultation responses for the Solway Tweed answered this question, with 29% leaving it blank. Of those who did respond to this question there was an even split with 50% of respondents answering yes, that they felt the balance was right between the different types of approaches in the draft FRMP.

Additional comments from those who answered yes to this question are summarised below:

**Figure 56 Solway Tweed responses to question 7**

- the different types of approaches to measures are clearly stated within the plans and the balance is clearly visible through the use of figures. We believe that the overall balance between Preventing, Preparing, Protecting or Recovery is appropriate
- the emphasis must be on prevention making sure we really plan for prevention in an integrated manner
- it is not possible to assess whether the required level of investment in each measure will be available. A particular example of where this might be of concern is with regard to the availability of funding for adequate maintenance to be carried out upon existing structures

Those who answered no this question provided a number of reasons as to why they felt the balance of measures were not correct in the Solway Tweed plan. These include:

- there should be more emphasis on prevention measures, to restore the natural function of the catchment. There is an ongoing measure for the Wear catchment to create new native woodland that would have a beneficial impact on flood risk, in line with the North Pennines AONB partnerships Management Plan. This should be proposed measure for the Tyne and Tees also, along with the other green engineering solutions such as leaky dams; where there is good evidence to suggest it can slow down flood waters. A proposal for this is in the Tyne Catchment Management Plan
- it is not possible to judge the appropriateness of the balance in a meaningful way given that the compromises made and decisions taken to arrive at each balance reported in each individual district plan are not disclosed
- the differentiation of approaches is too complex and shifts the focus of the FRMPs away from practical management of flood risk to providing an inventory of individual measures. As such, it risks misrepresenting local strategies by missing some schemes and actions and placing disproportionate emphasis on others. The FRMPs should not be quantified

inventories but should be a coordinated summary of the local strategies that are delivering flood risk management, at the catchment level. If quantification is required to meet EU Directive requirements this should be done separately from setting out how local risk management authorities and their partners will work together to manage flood risk in their catchment

- there remains a clear emphasis on Environment Agency work. Examples should include the positive benefits for reducing flood risk and economic growth offered by more application of sustainable drainage systems in developments. Settlements in rural areas are also at risk from flooding from surface water runoff from high ground

**Question 8: “Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included.”**

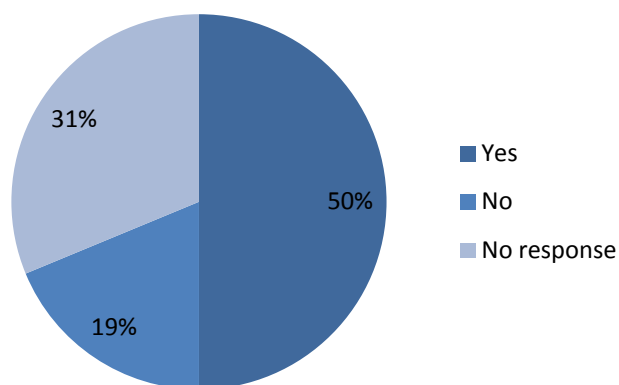
50% of respondents to this question stated that there were other measures that should be included in the Solway Tweed FRMP.

The key areas for improving measures are detailed below:

**Making measures more specific:**

*“FRMPs should show who is doing what, where and when in each catchment, in terms of strategies and broad actions.”*

- inclusion of measures associated with assets that are not currently included such as sewers
- prioritise measures in areas that contribute to protected areas such as bathing waters
- greater involvement in local Catchment Partnerships is essential so that measures are in peoples self interest. Measures need to be around something tangible



**Figure 57 Solway Tweed responses to question 8**

**Linking FRMP and existing flood plans:**

A number of responses highlighted a need to ensure FRMP measures were linked where possible to other existing flood plans such as shoreline management plans, surface water management plans and local flood risk management plans:

- shoreline Management Plans must be explicitly joined up with FRMPs so that the SMP action plans and FRMP measures and objectives are explicitly congruent
- the main focus of the FRMPs should be in showing how local flood risk management strategies join up across the catchment and relate to national FCRM strategy
- the draft FRMPs do not take adequate account of surface water management and the use of SuDS and water management measures to manage surface water at source and control the passage of water through the catchment as part of an integrated flood risk and water management strategy

### **Maintenance:**

- culvert repair/improvement plans should incorporate implicit assumption to explore day lighting options Initiate formal process for day lighting/channel restoration/SUDS installation opportunities to be acknowledged, assessed and incorporated at the very earliest stages of any planning and development proposals put to local government
- the FRMPs must recognise that regular, ongoing programmes of maintenance are an essential part of flood risk management, and must be coordinated at a catchment level
- the draft FRMPs are disproportionately biased to quantifying capital schemes rather than setting out maintenance programmes

### **Other proposals included:**

- synergies between flood risk schemes and environmental improvements need to be greater
- the importance of peat land restoration to prevent downstream flooding is noted throughout the management plan, but only appears as an action in the Tees proposed measures table. Restoration of these areas, including gully blocking, has just begun, and requires further funding

## **Question 9: “How can you support the work set out in the draft flood risk management plan to reduce flood risk?”**

There were a variety of ways in which consultees felt they could support the work of the draft flood risk management plan to reduce flood risk. Key themes that emerged from the responses provided include:

- partnership working and its associated benefits
- natural flood management
- provision of advice and/or training to promote understanding; share best practice; achieve multiple benefits

More detail surrounding these themes can be found in the summary below:

The Regional Flood and Coastal Committee (RFCC) in the North West are working to integrate managing the water environment at a river basin and catchment scale including flood risk, water quality and water resources through partnership working and the implementation of innovative and sustainable interventions. This is being delivered through the development of a 2030 Vision, the following being key areas that support this:

- land management – through the education and engagement of customers regarding water quality and flood risk management
- conservation – through encouragement of the wider use of ponds and lakes when developing strategic sites for business and industry
- community resilience – by having strong objectives that facilitate increasing awareness of flood risk
- integrated catchment management – by monitoring / reporting on the success of partnership groups in linking flood risk and environmental outcomes

- sustainable economic growth – by working with business and encouraging this sector to take more responsibility for flooding
- climate change – demonstrating impacts on flood risk through simple examples that people can relate to

Eden Rivers Trust (ERT) already works very closely with the EA on reducing flood risk in the Eden Catchment through various methods. They have also identified ways in which they could support work set out in the draft FRMP. These include:

- river restoration projects
- localised studies in rural locations (for example, Stockdalewath)
- the Interreg ALFA project
- work closely with communities without any perceived 'threat' from a government regulator
- help reduce the risk of flooding, especially in rural communities

Northumberland National Park would welcome supporting this work through:

- partnership working
- close working relationship with the farming community, land managers and local parishes
- assisting with natural flood risk management schemes, peat projects etc, integrated with land management and stewardship
- advising and mapping potential wetland habitat creation or floodplain woodland scheme design
- helping local communities and farming areas become more resilient to climate change
- linking up schemes to have a bigger benefit on a landscape scale

United Utilities will be proactive in working in partnership with other risk management authorities and identify that there are opportunities to work together to understand how water company assets can be included in future planning cycles.

- SEPA will continue to work with the Environment Agency and Cross Border Advisory Group to review the situation with regard to cross border flood risk. They will also continue to support and coordinate the delivery of the FRM Plans for the cross border areas through the provision of relevant data, FRM planning outputs and stakeholder engagement.
- The North Pennines AONB Partnerships Peatland Programme is working towards restoring habitat in the Tees, Tyne and Wear (Northumbria) and Eden (Solway Tweed) catchments.
- The Wild Trout Trust can provide training events and presentations to mixed disciplinary teams within the E.A. and are particularly keen to speak to Flood Risk and Development Control teams in order to facilitate access to best current knowledge and practice for managing flood risk whilst also generating ecological (and associated societal) gains.

- Cumbria County Council is the Lead Local Flood Authority for Cumbria and will engage with a wide range of partners to support the work set out in the draft flood risk management plan to reduce flood risk.

## Consulting on the Solway Tweed River Basin District

The Solway Tweed Flood Risk Management Plan consultation was promoted to predefined stakeholders via targeted emails and to the wider community, interest groups and the public using social media and newspaper adverts. Meetings were held to inform attendees of the process, give details of on the consultation questions and provide examples of the measures to familiarise themselves with the plan and encourage them to respond. Wherever possible we promoted the 2<sup>nd</sup> cycle draft river basin management plan alongside the FRMP. A press release was issued at the start and the end of the consultation period.

Staff involved in meetings with stakeholder groups and partners shared information on the FRMP at their meetings during the consultation period. Examples include:

**Table 24 high level summary of engagement Solway Tweed RBD**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	4	Farming/Land Management, Leisure/Tourism, Environment Management, Non Government Organisations
<b>Workshop</b>	2	Multi-Sector, Environment Management, Non Government Organisations
<b>Email</b>	multiple	Lead local flood authorities, key stakeholders.



### 3.8. South East River Basin District

The South East River Basin District covers the counties of Hampshire and the Isle of Wight, across East and West Sussex to Kent. Responses were received from a variety of different organisations including local government, environmental non-governmental organisations and the agriculture and water industry sectors. A number of individual responses were also received which focused on the Arun and Western Streams; and Cuckmere and Pevensey Levels management catchments.

46 responses were received for the South East RBD. The level of detail in the responses to the ten consultation questions varied greatly. Some responses concentrated on single issues whilst others gave comprehensive thoughts on all of the questions. In many cases the responses received did not follow the structure of the consultation questions.

The word diagram below illustrates some of the key themes that were raised in the responses.



#### Feedback came from the following groups:

Table 25 breakdown of responses by organisation type South East RBD

Organisation Type	%	Number of Responses
Government, local	22%	10
Environment management (including NGOs)	20%	9
Individual	15%	7
Farming/land management	6.5%	3
Utilities	6.5%	3
Government, national	4%	2
Business/Commerce	2%	1
Other	24%	11
<b>Total</b>		<b>46</b>

## Summary of consultation feedback

The following pages summarise for each questions the general themes emerging from an analysis of all the responses and highlights areas that will be taken into consideration for the final FRMP

### Question 1: “Do you agree that this draft plan sets out the most significant flood risk issues for your area? If not, please explain what you think is missing.”

Of the consultees that responded to this question, 40% felt that the plan set out the most significant flood risk issues for the South East River Basin District.

The primary concern focused on the extent to which local sources of flood risk are covered. Whilst the plan does include information on all sources of flooding; groundwater, surface water and sewer flooding were considered to be underrepresented. A couple of responses highlighted that this meant the plan was not able to adequately consider the impact of combined flood risk. Some responses also raised concerns that not all lead local flood authorities had contributed to these plans and local actions were not as prominent as they needed to be.

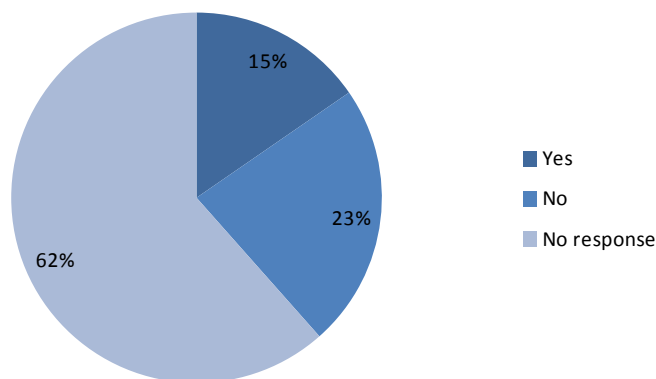


Figure 58 South East responses to question 1

*“Although the plan acknowledges the role of Surface water flooding, it only significantly reviews the impact of surface water flooding in Brighton and Hove. This is a serious oversight. As far as we are aware, in the majority of cases, surface water run off generated from urban hard surfaces is now the single largest cause of flood risk to people and property on a regular basis.”*

*“we feel that it is difficult to appreciate the full picture with regards to flood risk given the absence of information on key types of flooding... In the future we believe it would aid understanding and engagement if all types of flooding were presented in a single integrated plan.”*

A couple of the responses highlighted that whilst having a single integrated plan for flood risk management is a positive step, the document itself was too big and difficult to navigate. It was felt that it needed to be easier for people to focus on individual catchments.

In addition more than one comment related to the plan needing to be clearer about what it was trying to achieve. There was some criticism that the plan did not set out the most significant risks in each catchment and could therefore not direct investment. It was noted that the plan did not highlight to risk to specific local communities.

*“Due to the requirements of the Flood Risk Regulations, the plan focuses on areas where large numbers of properties are at risk. This gives a false picture of the risks and downplays the impact of flooding on isolated communities/properties”*

## Question 2: “What do you consider to be the highest priorities for managing the risk of flooding in your area?”

Responses to this question were varied and determined by the nature of the organisation that was responding, for example catchment partnerships and environmental stakeholders had a focus on natural flood management.

The following themes were identified in more than one response to this question:

- the desire for a greater emphasis on natural flood management and supporting landowners to provide increased flood storage in the flood plain
- the need for better engagement with the public to help them understand their risk and communicate the latest flood risk management research – for example on dredging
- the importance of preventing development in the floodplain, and encouraging the development and implementation of surface water management plans
- better co-ordination of actions to address flood risk across risk management authorities
- strategic and co-ordinated approach to maintenance – the plan focuses on new works and does not detail maintenance activities
- better involvement of catchment partnerships to find solutions to flood risk management and explore wider opportunities for funding
- the significance of the impact of climate change on low lying coastal plains/communities and the dominance of coastal issues in this area

*“The implementation of land management schemes or practices which increase infiltration and reduce surface runoff could have benefits in reducing and delaying flood peaks...and would also have additional benefits for water quality.”*

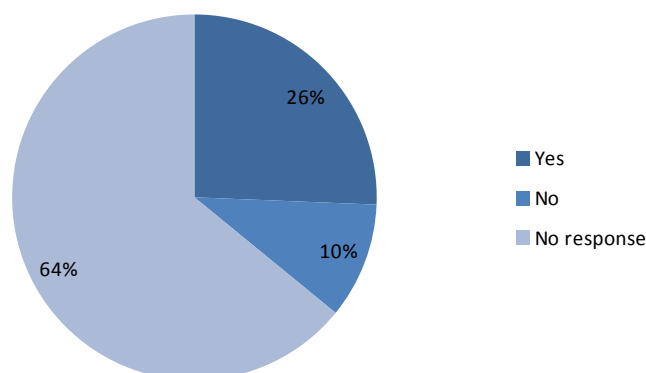
*“Identifying key objectives for catchments and then how risk management authorities will work together, exercising their own powers and duties, to realise these objectives is a very high priority.”*

*“A strategic and coordinated approach to maintenance is also needed.”*

A number of consultees used this consultation to provide specific comments on the management of the lower tidal River Arun and the tidal River Cuckmere. With regards to the River Arun these comments focused on the proposed changes to the maintenance regime and the limited reference to this in the plan. Comments received regarding the River Cuckmere detailed disagreement with the current management approach.

*“The increased flooding arising from inadequate maintenance this year is a clear warning of what we can expect if the EA withdraws from river management work south of the A259”*

## Question 3: “Do you understand the objectives as described in the draft plan? If not, what would help you understand them better?”



As only a limited number of respondents used the online consultation tool, only 35% answered this question. Of those that did, 71% confirmed that they did understand the objectives described in the draft plan.

The majority of responses were positive and did not generate any further comment.

*“We support the overall objectives set for the South East River Basin District (SERBD) and*

Figure 59 South East responses to question 3

*view these as providing a framework for action”*

The main issues for those that did not understand the objectives were:

- some objectives would benefit from being amended or further clarification provided
- the objectives were not consistent across the catchments
- the objectives lack reference to coastal erosion and in places groundwater flood risk
- clarity should be provided on how catchment and river basin district level objectives sit alongside each other
- stronger links need to be made between the objectives and delivery – with some actions not clearly identifying all relevant objectives (for example lack of environmental objectives recorded against actions)
- additional objectives were suggested such as inclusion of the role of catchment partnerships and sustainable soil management
- there are no performance indicators detailed to measure progress against delivering the objectives

*“We understand the objectives, but feel that some amendments/clarification would be useful to improve validity.”*

*“It is not clear how differing objectives sit within the overarching Flood Risk Management Plan objectives.”*

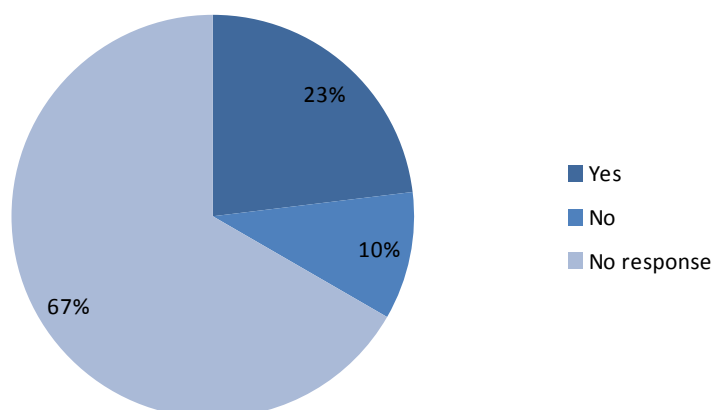
*“A lot of the actions on the objectives have no performance indicators for the work to be carried out... relating either to number of properties saved nor flood risk reduced by an amount.”*

*“The objectives are too numerous and could easily be reduced in number to make them more specific. The objectives are very subjective in parts they need to be more focussed to enable clear delivery against them to be measured.”*

#### **Question 4: “Is the balance right between the ‘social’, ‘economic’ and ‘environmental’ objectives, as explained in the draft plan? If not, what would you change and why?”**

The majority of respondents who answered this question (69%) felt that the balance of objectives was adequate. However, even the positive responses identified areas of concern with the consistency of the objectives across the plan and how they had been derived. There was also considerable uncertainty around the relative priority of social, economic and environmental objectives.

*“Whilst the objectives as they stand are welcomed, we are unclear as to how they are weighted and prioritised in order to give rise to measures.”*



**Figure 60 South East responses to question 4**

*“We agree that social should have the highest priority but consider that the environmental and economic objectives should be roughly equal.”*

Amongst respondents, there was no consensus as to what the balance of objectives of the plan was, or furthermore what it should be.

*“It is good to see four of the 9 objectives as listed for the River Basin District focus on environmental objectives and good that these objectives do not treat the environment as a passive ‘thing’ to be protected but as a potential contributor to flood risk reduction in its own right.”*

*“the lack of environmental measures included despite the national and international importance of the environment within the T&I catchment suggests that environmental objectives are not sufficiently considered.”*

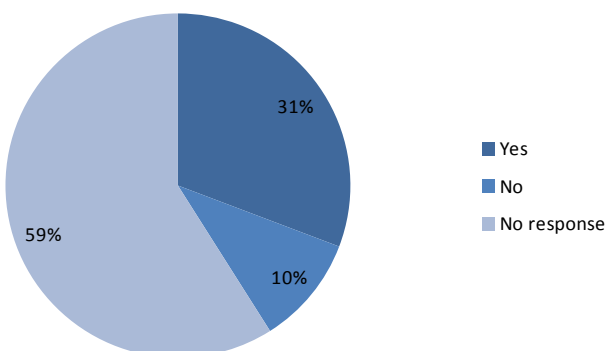
*“The balance between environment and economic should be more equal if plans are to be sustainable in the long term.”*

*“However, whilst the objectives appear balanced, in reality the delivery of FCERM does not give adequate weight to economic activities.”*

A common theme that was raised was that in many cases social, environmental and economic objectives are intrinsically linked and that objectives should be included that reflect this. In most cases these comments were made in the context of ensuring that the objectives, and by extension the plan itself, was sustainable.

*“We feel that greater consideration should be given to measures which integrate economic, social and environmental objectives in order to foster longer-term sustainability.”*

**Question 5: “Are there other flood risk management objectives that should be included? If so, please explain what they are and why they should be included?”**



**Figure 61 South East responses to question 5**

The majority of respondents (75%) who answered this question felt that there were other objectives which should be included.

The common suggestions for improvements/additional objectives at a strategic scale were:

- a greater emphasis on sustainability – combining social, environmental and economic aspects of flood risk management
- better encouragement of joint working across all stakeholders, with catchment partnerships receiving the most recognition
- reference to the integration of this plan with the river basin management plan
- better encouragement of holistic and innovative approaches for water management

*“A specific objective to agree flood risk management measures with Catchment partnerships should reduce the likelihood that such natural approaches to flood risk management are overlooked”*

*“There needs to be an objective to encourage innovative ways to achieve cost-effective FCERM (coupled with WFD benefits as appropriate).”*

Suggestions for improvements and additional objectives that addressed more specific concerns included:

- recognition of the impact of- and resilience to coastal change
- natural flood management as the primary solution for addressing flood risk
- ensuring planning law and policy supports growth whilst preventing inappropriate development
- recognition of the value of agricultural land
- provision of better groundwater flood warning systems
- better recognition of interaction of groundwater with other drainage systems

*“Groundwater flooding is mentioned and the impact on other drainage systems, particularly foul sewer networks, needs to be fully appreciated through continued close liaison between risk management authorities.”*

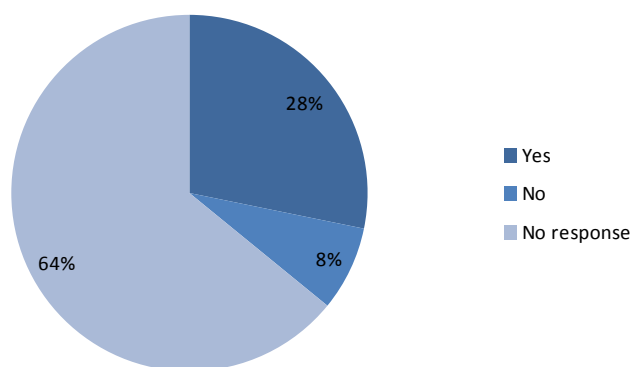
One respondent used this question to highlight a more fundamental concern that the plan does not conclude the most significant objectives for each catchment but compiles objectives from a variety of other sources.

*“We would like to see strategic goals or aims identified for flood risk management in each catchment that help to achieve the objectives, rather than a list of previously determined activities.”*

### **Question 6: “Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan? If not, what would help you understand them better?”**

Of the respondents who answered this question, the majority (79%) confirmed that they understood the difference between the different types of measures.

Only a small number of comments were made to support the response to this question, however the focus of these comments was on the relative priorities of the measures and on the timescales for review and implementation. This was of particular interest for ongoing and agreed measures where the plan was not specifically seeking comment.



**Figure 62 South East responses to question 6**

*“We understand the difference, although we would welcome the opportunity to engage in ongoing and agreed measures.”*

*“Clarification needed to Ongoing and Agreed measures if they will be subject to review by the community to identify whether they are still a priority into the future.”*

*“it would be beneficial if further clarification is provided on the agreed schemes in terms of the timescales for implementation.”*

Further to this, some respondents highlighted that early engagement with partners in the development of measures would be welcomed, and that partnership working should have greater prominence in all measures.

*“greater emphasis on partnership working should be built in to all ongoing, agreed and proposed measures.”*

One respondent felt strongly that there was too much consideration of strategies and plans, inhibiting the delivery of improvements and schemes while another used this question to comment on the statistics used in the plan and the lack of clarity as to how they have been used to prioritise the measures.

**Question 7: Across all proposed, agreed and ongoing measures, the plan describes ‘prevention’, ‘preparation’, ‘protection’ and ‘recover and review’ approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**

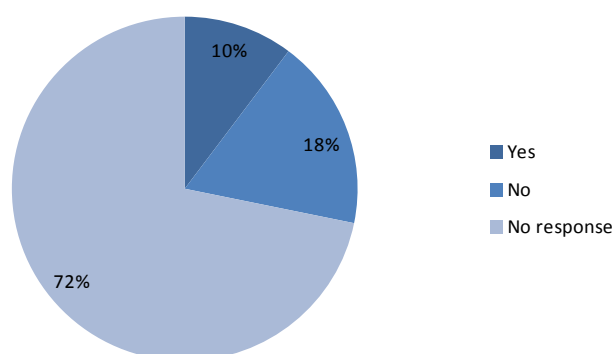
This question received the lowest response rate. Of the responses received however only 36% agreed that the balance is right within the plan for the different types of approach. The responses highlighted that the balance between the measures was catchment specific - responses for catchments where groundwater flooding is prevalent (for example the Test and Itchen) indicated that there was too much emphasis on preparedness. In other catchments a bias towards protection over prevention was observed.

Other points made were:

- not enough focus is given to longer term adaptation measures
- not enough measures relate to pro-active community resilience
- prevention is not always the most effective solution
- an incomplete picture is presented – not all flood risk measures from all risk management authorities are included
- the variation in scope of the actions makes comparison difficult

*“Many of the key flood issues needing to be addressed are major, long term issues and no amount of prevention, preparation or protection will enable sufficient recovery from their effects”*

*“It is also difficult to gauge the balance of actions in the catchment given that the picture is incomplete due to the plan not including actions from all risk management authorities”*



**Figure 63 South East responses to question 7**

*“The range of measures vary from high level strategic / aspirational actions to very local specific ones and as such simply comparing on the basis of numbers of actions in each category is pointless.”*

It was also raised by a couple of respondents that an inconsistent approach to the classification of measures seemed to have been taken both within and across the different Flood Risk Management Plans. It was felt that many measures developed from existing plans did not fit the categories of ‘protection’, ‘prevention’, ‘preparedness’ and ‘recovery and review’, and the categorisation was therefore too subjective to compare them sufficiently .

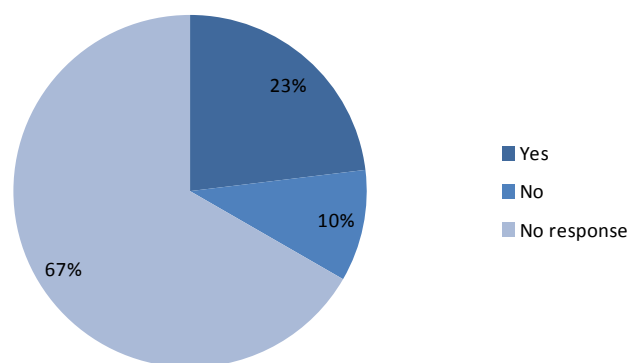
*“If this approach is to be used consistently it requires a wholesale review and potential re-write of all existing action plans to ensure consistency and standardisation fit this format.”*

Of those responses received, a significant amount of detail given regarding individual measures included in the plan, and proposed new measures. These comments will be considered alongside those for question 8.

**Question 8: “Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included.”**

The majority of respondents who answered this question (69%) agreed that there are other proposed measures which should be included in the plan. The suggestions made in response to this question varied. Some of the suggested areas that it was felt new measures should cover included:

- natural flood risk management
- ensuring Surface Water Management Plans are in place for all major conurbations
- mandatory Sustainable Drainage Systems (SuDS) for new development and maintenance of these systems
- establishment of a strategic fund to be used for ‘sustainable flood risk management trials’
- measures with integrated benefits
- sustainable development and land use practices
- co-ordination of activities across flood risk management
- development and planning advice
- adaptation measures
- encouragement of local initiatives to address flood risk
- addressing the impact of changing maintenance regimes
- consideration of the historic significance of areas where flood risk schemes are proposed



**Figure 64 South East responses to question 8**

*“We believe that without demonstration, the potential for natural flood risk management techniques to deliver cost effective and sustainable solutions to flooding issues will go untapped.”*

*“Ensuring no increase in the risk of flooding arising from future development is critical with the delivery of planning advice and SuDS as the key measures. In reality this needs much higher profile”*

*“Any proposals to improve flood risk...should conserve and enhance the heritage assets in these settlements and environmental enhancements should include enhancements to cultural heritage where possible”*



Some respondents, not limited to Risk Management Authorities, wanted to see all their measures and actions included in the plans. It was also raised that some actions and measures referenced in the document were not apparent in the measure tables. One respondent wanted to see the plans document measures that had been considered and subsequently rejected, with evidence behind these decisions.

Some responses were focussed on specific locations with stakeholders in the Cuckmere and Pevensey Levels catchment identifying what their preferred options for managing the tidal Cuckmere would be.

### **Question 9: “How can you support the work set out in the draft flood risk management plan to reduce flood risk?”**

The respondents to the consultation were from a variety of different sectors so the response to this question varied between local suggestions and proposals to working together more effectively and influencing at a wider scale.

Opportunities for partnership working were the main theme across the responses and included the following:

- providing advice to landowners
- supporting engagement with local communities – for example flood and water fairs and using existing press networks
- development of the catchment based approach and catchment partnerships
- closer liaison between all risk management authorities
- sharing of information and evidence
- co-ordination of local operational activities

*“We have a very good network of press and PR and can reach wide audiences with message about flooding.”*

*“We would be keen to explore where there are opportunities to deliver catchment benefits as well as FRM benefits; some of the projects that the partnership are developing may provide an opportunity to do this.”*

*“continue to provide support by close liaison with the Environment Agency, Lead Local Flood Authorities and other Risk Management Authorities, to ensure a common, clear appreciation of flooding risk issues and, where there are common interventions, to reach the most effective solution.”*

*“We are also undertaking a number of activities that help to meet the objectives including landowner engagement regarding runoff and sediment control, local works that benefits areas at risk and information to make flood risk issues clear to the public.”*

Other suggestions included:

- Influencing land use through other schemes and initiatives
- Helping to fund natural flood management approaches
- Providing knowledge of individual catchments and local areas

*“we may be able to provide funding both directly to landowners who are willing to plant trees on their land but also to partnership projects that wish to include trees in their plans to improve the water environment”*

**Question 10: “Are there things you think should be done to improve co-ordination of river basin and flood risk management planning?”**

Responses to this question varied in scope with some focussed on changes to how data and information is presented in the plans to comments on how strategic and operational processes could be better integrated. Quotes taken from the responses have been used to summarise this below.

**Table 26 Quotes summarising feedback on FRMP and RBMP co-ordination**

<i>“engage communities and consultees at an early stage within the draft management planning system (particularly for Flood Risk Management Strategies).”</i>	<i>“the linkages between the environmental objectives of flood risk management planning and those of WFD [Water Framework Directive] could be made clearer”</i>
<i>“We need to ensure continued close liaison of the risk management authorities and partners”</i>	<i>“The development of the strategies to deliver...these plans should be integrated.”</i>
<i>“the full integration of the flood risk management into the work of the catchment partnerships would go a long way to ensuring that all multiple benefit projects and ideas are identified at the earliest opportunity”</i>	
<i>“Identify SWB [Surface Water Body] ID for catchment specific measures tables... to allow CaBA [catchment based approach] partners to understand where proposed measures will take place in their catchment.”</i>	<i>“involvement of key stakeholders would be facilitated by having consultations of the same length, and ensuring that formal events to help organisation engage with the process cover both consultations.”</i>
<i>“Meeting WFD targets needs to be co-ordinated with flood alleviation schemes and removal of redundant historical water level control mechanisms.”</i>	<i>“Clarity of what function each type of plan / document has and its relationship to other documents.”</i>
<i>“Plans and actions need to be geo-referenced as they will be utilised at a very local level so reference to the smallest possible geographical unit (parish ideally) will ensure proper co-ordination of activities.”</i>	
<i>“It would be useful to have a flow chart showing the hierarchy and interaction between the various plans that are now evolving.”</i>	<i>“it is important to be clear on the links between various strategies.”</i>

## Additional Feedback for the South East River Basin District

Almost half of the responses received were submitted outside of the online consultation tool and did not respond specifically to the consultation questions. The responses were both detailed and varied. The comments related both to the South East plan and the wider flood risk management plan process. The main themes have been summarised in this section.

- The plans are a significant step towards integrating flood risk management and river basin planning, however the links between the plans and River Basin Management Plans should be expanded.
- The plans are not clear or consistent about what they are trying to achieve. The scope of the plans does not align to the stated outcomes.
- Because lead local flood authorities outside of Flood Risk Areas only included information on a voluntary basis the plans are incomplete, inconsistent and misleading in their representation of local flood risk.
- The plans do not sufficiently identify communities at highest risk in a way that can help target investment.
- The plans need to identify other sources of flood risk information more explicitly – for example Local Flood Risk Management Strategies
- The roles and responsibilities for flood risk management need to be clarified.
- Prioritisation of measures and timescales of delivery should be included.
- Comments were made specific to the Environment Agency's Lower Tidal River Arun Strategy and management approach of the River Cuckmere
- The documents were considered to be too large and poorly structured.
- It was not clear if or how the conclusions of the plans have influenced the measures.
- The plans should provide more detail on how climate change has been taken into account.
- Concerns were raised regarding the impacts on freshwater biodiversity and deliverability of compensation measures.
- Marine Planning should be explicitly referenced in the plans.
- The plans should have more consideration of the value of the agricultural industry.
- Maintenance of watercourses should be more frequent, sustained and promoted.
- The consultation should not have focussed on 'proposed' measures.

## Consulting in the South East River Basin District

The Environment Agency's approach to promoting the consultation locally was predominately via emails and meetings with different stakeholders. Engagement on the plan was undertaken alongside the South East River Basin Management Plan to maximise opportunities to reach the relevant stakeholders and to encourage co-ordinated responses to both plans.

The Environment Agency also promoted the consultation locally via social media.

**Table 27 High level summary of engagement South East**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	28	Freshwater Habitats Trust, New Forest Catchment Development Group, New Forest National Park Authority, Hampshire and Isle of Wight Wildlife Trust, Test and Itchen Catchment Partnership, Upper Itchen Initiative Group, Wessex Chalk Streams and Rivers Trust, Blackwater Conservation Group, Arun and Western Streams Catchment Partnerships, Adur and Ouse Catchment Partnership, Lewes District Council, Cuckmere and Pevensy Levels Catchment Partnership, Cuckmere and Pevensy Levels Water Week, Romney Marsh Living Landscape Partnership, Kent Wildlife Trust, Rother and Romney Catchment Partnership, Ashford Environment and Nature Conservation Forum, East Kent Catchment Improvement Partnership, Ashford Water Group, Dour Partnership, Friends of the River (Canterbury), Wildfowl and Wetlands Trust.
<b>Workshop</b>	1	All South East and Thames Water companies
<b>Email</b>	multiple	Lead local flood authorities, key stakeholders.
<b>Phone</b>	1	Cuckmere and Pevensy Levels Steering Group

### 3.9. South West River Basin District

The South West River Basin District covers the Isles of Scilly, Cornwall, Devon, Dorset and parts of Somerset, Hampshire and Wiltshire. There was a broad range of responses from different organisations throughout the South West. Over half of these were from local government and environmental non-government organisations. Catchment partnerships, utility companies and national government were among other sectors that also commented. There were also several responses from community organisations and individuals.

32 responses were received for the South West RBD. The focus and level of detail in the responses to the consultation questions varied greatly with some respondents concentrating on single issues whilst others provided detailed feedback to all of the questions.

The majority of respondents didn't comment on their satisfaction with the consultation process. Those that did had mixed experiences while using the consultation tools, however they provided feedback on how the process could be improved in the future.

The word diagram below illustrates some of the key themes that were raised in the responses.



Feedback came from the following groups:

**Table 28 breakdown of responses by organisation type South West RBD**

<b>Organisation type</b>	<b>%</b>	<b>Number of responses</b>
Individual	28.1%	9
Utilities	6.3%	2
Environment management (including NGOs)	12.5%	4
Farming/land management	3.1%	1
Government, local	31.3%	10
Government, national	3.1%	1
Other	15.6%	5
Not entered	0.0%	0
<b>Total</b>		<b>32</b>

## Summary of consultation feedback

The following pages summarise for each question the general themes emerging from the consultation and highlights areas that are being taken into consideration for the final FRMP.

### Question 1: "Do you agree that this draft plan sets out the most significant flood risk issues for your area?"

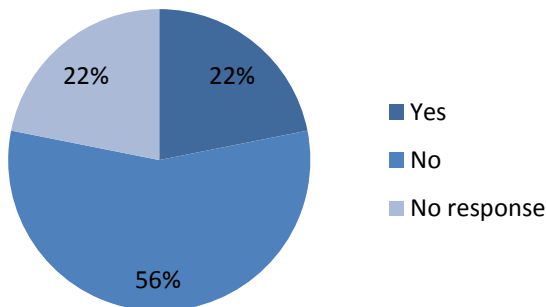


Figure 65 South West responses to question 1

The majority of respondents indicated that the draft plan did not cover the most significant flood risk issues within their area. There was no correlation between the response and the sector responding.

There were two common themes within the responses. Firstly when the various sources of flooding were addressed it was felt that both groundwater and sewer flooding were poorly accounted for despite being a genuine concern within the respondent's area. The cumulative effect of multiple sources of flooding was also poorly explored and subsequently the draft plan

lacked appropriate management of such flooding.

*"No proper conclusions for the combined threat of surface, river, tidal flooding in catchment are mentioned. The generic paragraph on surface water, ordinary watercourses and sewage should be expanded further."*

Secondly the generic nature of the issues were criticised as they did not provide any location specific information or enough detail as to be perceived useful. This issue was picked up on by multiple respondents.

*"Many of the catchments are identified as having flood risk from various sources but do not identify specific areas or level of flood risk. The level of detail differs between catchments."*

Further comments suggested the plan did not proportionally address the following issues:

- flooding implications due to climate change
- impact of flooding on farmland productivity
- coastal erosion
- Rapid Response Catchments

### Question 2: "What do you consider to be the highest priorities for managing the risk of flooding in your area?"

Due to the scale of the area covered under the management plan it is not surprising that the local priorities varied widely amongst the respondents. However there were some shared themes as set out below.

Firstly concerns were raised over the current funding approach outlined and how this is likely to change in the future for both new projects and maintenance. The maintenance of existing channels

and defences was given a significant weighting in multiple responses. It was voiced that a robust and transparent funding regime is vital to ensuring the longevity of defences and maintenance.

*“ 1. Adequate and appropriate resources within each of the Risk Management Authorities with relevant expertise and focus on FRM 2. Funding both from local sources and national for the review of flood risk and delivery of flood improvements”*

*“The FRMP should set an objective to ensure a Robust Revenue Maintenance Programme Exists. We welcome investment in a revenue maintenance programme. This is critical if we are to maintain our existing flood defences and drainage infrastructure.”*

It was also widely commented that hard engineering is always going to play a key role in managing flood risk, although softer approaches should also be sought to replace or compliment such schemes.

A catchment wide approach that delivered multiple environmental benefits through partnership working was considered to be the most effective way to reduce flood risk. Specific examples were provided to strengthen calls for an increase in floodplain connectivity and river restoration to be completed in upper catchments alongside other ‘softer’ land management techniques.

*“Although hard engineered structures will always be the first line of flood defence in England, there is considerable potential in natural flood management measures..... Such natural flood management measures tackle the root cause of flooding, in contrast to many others, which focus on treating the symptoms.”*

*“The rest of the focus is on hard engineering to resolve flooding, there is little consideration given to proven upstream management measures and little or no mention of land use and land management in reducing flooding”*

Partnership working was considered a key way to ensure greater environmental outcomes were achieved for the minimal cost. This could be achieved through resource and information pooling which would help reduce the amount of duplicated work. By consulting partners at a conception stage it was perceived that re-designs would be eliminated mid project.

While these points were widely agreed upon there were also more individual or even conflicting priorities suggested by some respondents as set out below:

- The acknowledgment of coastal protection and the maintenance and upgrading of existing defences due to the high value of the areas benefiting from such defences
- the need for long term plans for sea level rise
- ensure that the cumulative impact is acknowledged when considering cost benefit analysis for schemes protecting rural communities
- the value of agricultural land and the landowner’s needs should be considered when considering land use change
- recognition should be given to the importance of maintaining conveyance in lower catchments
- the need to create woodland in suitable floodplains and buffer strips to attenuate flows
- better information and education is needed to ensure that expectations are managed
- controlling/remove surface water connections to combined sewers and the impact of groundwater on sewers
- localised issues highlighted or current management practices questioned



### Question 3: "Do you understand the objectives as described in the draft plan?"

The majority of those who commented on this question felt that they understood the objectives described in the draft plan. However it was commented that the main objectives were hard to locate and even under the heading 'Conclusions and Objectives' there was no description of what the overall objectives were.

Another criticism of the objectives within the draft plan was that there was no way to assess the priority of objectives. Another respondent noted that it would make the draft plan easier

to follow and would have aided in the consultation response.

The generic nature of the objectives were also questioned and that they lacked performance indicators to measure success against. One respondent also commented that a deadline on objectives was required.

*"A lot of the actions on the objectives have no performance indicators for the work to be carried out. Whilst we recognise these will be in place for individual schemes, there are no overarching indicators relating either to number of properties saved nor flood risk reduced by an amount"*

Other comments include:

- objectives contained factual and grammatical mistakes
- lack of an overarching objective supporting the implementations of natural land use solutions.

Responses to this question also included suggestions of additional objectives which have been amalgamated with the responses to question 5 as there was some duplication.

### Question 4: "Is the balance right between the 'social', 'economic' and 'environmental' objectives, as explained in the draft plan?"

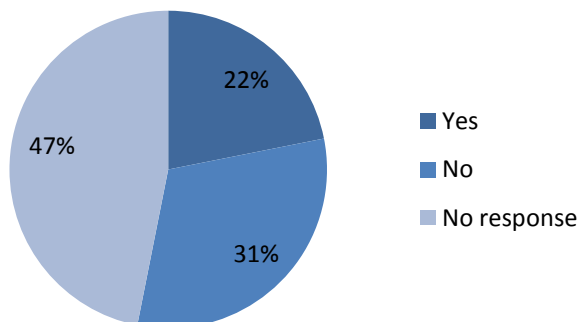


Figure 67 South West responses to question 4

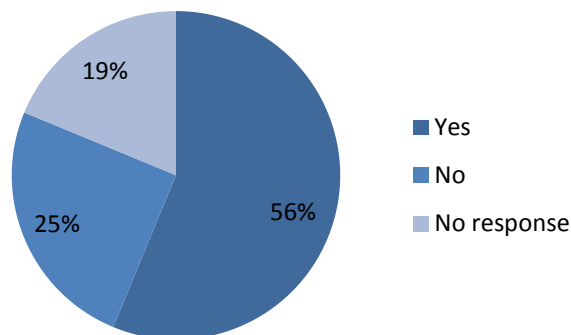


Figure 66 South West responses to question 3

The majority of local government respondents agreed that the correct balance had been reached. This was in stark contrast with the individual respondents who all disagreed. One respondent felt that the balance between the three categories was not explained within the document and another felt the layout of the objectives made it hard to assess against each other.

It was felt by various respondents that environmental objectives were generally underrated throughout the draft plan.

Suggestions were made that projects that delivered multiple environmental benefits should carry an inflated weighting to reflect the wide range of benefits they could achieve. This went hand in hand with the desire for an increase in partnership working from project conception through to completion.

*“The balance does not provide the right mix as there is little focus on the multiple benefits accrued by using an ecosystem services approach and bringing together multiple funders and objectives to deliver more substantial projects with more holistic benefits.”*

Along a similar theme to some of the responses to question 3 it was felt that it was hard to priorities the objectives against those in the same category let alone the other categories. This is especially important when the various objectives conflict with one another.

*“Can you explain the purpose of segmenting the objectives different groups? Surely it is far better to give each objective a weighting in terms of how important that objective is in meeting the overall objective of managing flood risk”*

There were also concerns about the sustainability of the plan if the economic aspects were weighted too low and as such it was suggested it needed to be brought up to a similar level as environmental.

*“We agree that social should have the highest priority but consider that the environmental and economic objectives should be roughly equal. This will make the plans more sustainable in the long term.”*

Other comments include:

- agree with the balance of the objectives although in some discreet areas Local Enterprise Zones will look to elevate economic growth above other objectives. Flood risk management must support Development Planning in this approach
- examples of local areas where new economic objectives/evidence have been provided
- focus should be on delivering resilient and prepared communities that understand the importance of good (and initiative) land and water use management for percolation and attenuation that benefit people, wildlife and the economy

### Question 5: "Are there other flood risk management objectives that should be included?"

The majority of the responses indicated there were missing objectives that should be included and it was commented that the objectives were very open ended and generic. As a wide range of respondents commented on this question, each with their own priorities, it was not surprising that numerous additional objectives were suggested.

Some of the more frequent comments were regarding additional objectives to manage flood risk through the use of natural land management and sustainable agriculture. One such example was the call for an objective that encouraged a reduction in sediment accretion in main rivers by reducing sediment runoff through land management. This was supported by the call for Catchment Based Approach partners to be specifically mentioned within the final plan to make sure partnership working was encouraged and subsequently maximum environmental outcomes were achieved for all projects.

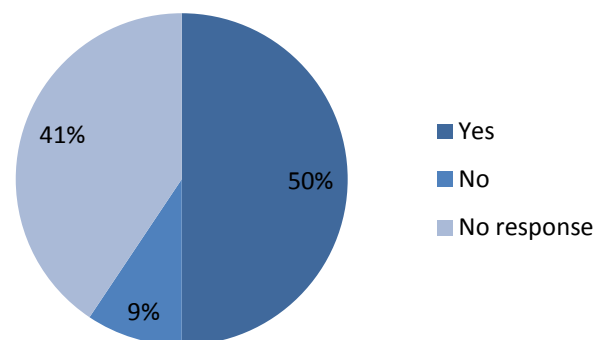


Figure 68 South West responses to question 5

*“Working with the CaBA partnerships should be explicitly identified as an objective. CaBA is mentioned at the end of the reports we have read, however, if it is not identified in the objectives there is a risk that a significant opportunity will be wasted.”*

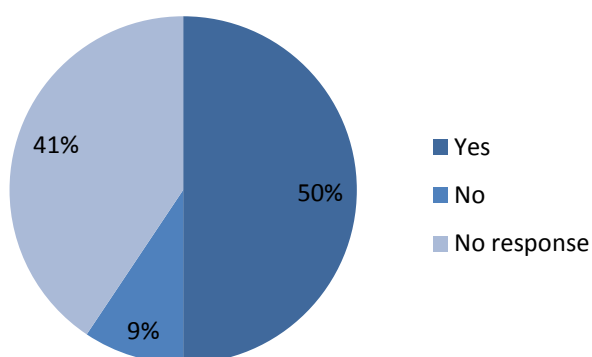
*“There is a real need for flood risk management measures to be developed with catchment partnerships in order to see integration from the ground up.”*

There were also responses that called for control of groundwater flooding to be an objective as it is felt to be a primary risk in some of the management catchments.

The following points provide a summary of some of the other comments made:

- flooding in some locations is not only beneficial but vital in maintaining strategic environmental objectives linked to the protection and potential enhancement of nationally designated sites
- needs to include specific mention of "avoiding loss of life" since this is a high priority for the Government
- include an objective into the economic category - Protection of Critical Infrastructure
- include the objective into the environmental category - Enhance biodiversity i.e. through SuDS
- coastal erosion requires more emphasis
- lacks information in the main body of the draft plan about the importance of managing invasive species
- integrating with the RBMP is obliquely mentioned but should be set out in a specific objective
- address the implications of long duration flooding of agricultural land regarding food production, infrastructure and the deposition of waste
- more emphasis should be placed on tidal flooding and defences with the acknowledgment of the benefit harbours and moorings provide
- the impermeability of urban areas needs greater emphasis in line with the numerous comments about agricultural runoff and soil permeability issues

### Question 6: "Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan?"



Half of the respondents felt they understood the differences set out, while only 3 answered no. Of these respondents 5 provided further comments. Concern was raised that the Flood Risk Management Plan was a moving target and, if all goes well, will quickly go out of date.

Further comments included:

- clarification is sought as to whether the Ongoing and Agreed measures will be subject to review by the community to identify whether they are still a priority

- one consultee suggested we used the

format on page 11 of the Environment Report and keep the same format for question 7

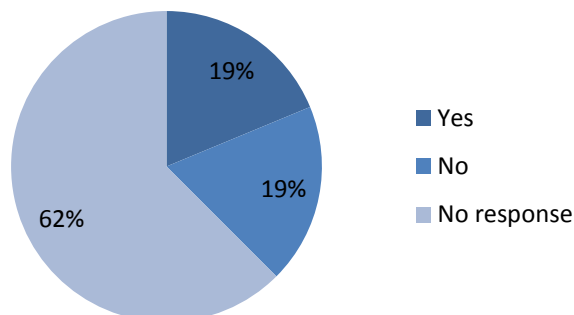
Figure 69 South West responses to question 6

**Question 7: Across all proposed, agreed and ongoing measures, the plan describes ‘prevention’, ‘preparation’, ‘protection’ and ‘recover and review’ approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**

The majority of respondents did not directly answer this question although 13 consultees provided further comments. One consultee queried why the Environment Agency were asking this question:

*“Priorities should be dictated by the importance of each objective in the management plan once they have been properly thought through and agreed.”*

The main theme behind multiple comments was that the wrong balance had been made between preventative and protection measures. It was felt that greater emphasis needed to be placed on preventative measures.



**Figure 70 South West responses to question 7**

*“The majority of the measures are about protection; recommend that you invest in schemes that may have a preventative outcome and also achieve multiple benefits such as achieving the WFD/River Avon Restoration Project objective of reconnecting floodplains/creating wetland habitat/sustainable agriculture”*

*“We accept that you need to protect existing property and infrastructure but also need to allocate resource into awareness and also into ensuring this requirement for protection reduces “ ie. no inappropriate development in high flood risk areas”*

One respondent called for transparency over how any changes in approach could be influenced by funding rather than changes best working practice.

*“Where a shift in approach is dictated by budget constraints rather than good practice or need, this should be made clear in policy documents”.*

One respondent also wanted to know if the Environment Agency will re-consult on the priority of projects that are ongoing and agreed to ensure they are still needed.

Further comments that were provided include:

- there is a call for greater community involvement through engaging with farmers and the parish council when measures may lead to a change in land use
- a preferred solution should be to look for opportunities for natural approaches to flood risk management
- the Environment Agency are too reliant on modelling and not listening to farmers with experience
- there should be focus on enhancing existing defences and flood prediction system
- provide a river Parrett tidal Barrier at Bridgwater
- the use and implementation of SUDs is critical
- no development should be made within the flood plain.
- for the South and West Somerset section there is no mention of the creation of a Somerset Rivers Authority which will lead on the 20 yr plan
- landowners should be able to manage and take ownership of their rivers

## Question 8: "Are there other proposed measures that should be included?"

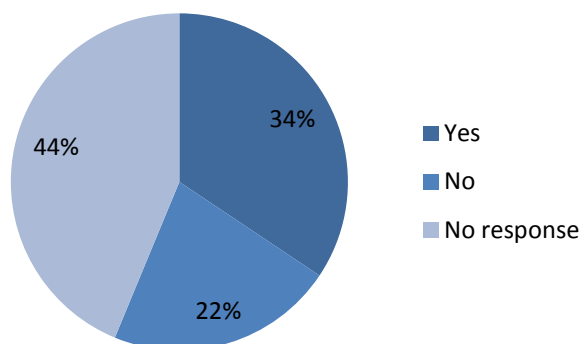


Figure 71 South West responses to question 8

11 out of the 18 respondents who answered this question said 'yes' and provided their ideas on what types of measures could have been included. The suggested measures were sometimes localised – relating to specific communities – or linked to understanding the reasons why certain historic local proposals have not been carried forward into this plan.

*'Is it possible to append proposed measures that have been excluded due to cost benefit assessment so that affected communities can understand the reasons why their schemes have not been included within the plan?'*

There was a theme of respondents wishing to see measures relating to changes of land management, the use of soft engineering options and a commitment to measures that integrate main river and local flood source solutions.

*'There should be a delivery framework that is outlined to integrated action to reduce flood risk and deliver against multiple agendas outlined in the Plan. We would recommend our integrated local delivery framework as outlined in the Community Guide for Your Water Environment and funding for facilitation to deliver locally led projects of multiple benefits.'*

*'We would also like to be sure that all opportunities for natural flood risk management measures have been explored and picked up, including the installation of woody debris, the planting of more trees & woods.....The omission of this delivery tool for natural land use management is an opportunity missed for this plan.'*

One respondent felt that there was an omission by not mentioning any management requirements for flooding though the use of beavers and that there is a need for monitoring in terms of flood risk.

It was also mentioned that new SuDs should be strictly enforced and monitored to ensure that they deliver improved flood management on the Exminster Marshes. The issue raised was not that the area floods as such but more the extent and duration of any flooding.

## **Question 9 "How can you support the work set out in the draft flood risk management plan to reduce flood risk?"**

There were 20 responses to this question – all of them positively advocating the use of partnership working, the tighter integration of different objectives and the promotion of projects with multiple benefits to deliver efficiencies in the use of public funding. There was a consistent theme for a catchment based approach to be fundamental to the development of flood plans by the Environment Agency, in conjunction with partner organisations.

*'By ensuring that flood risk management generates multiple benefits.'*

*'Consider opportunities for joint working and funding of flood improvements.'*

*'Continuing to fulfill role of LLFA Partnership working.'*

*'...to work to influence land management to reduce flood risk.'*

*'There are clear benefits to be gained from co-ordinating planning processes for the more efficient delivery of a range of environmental outcomes. In addition to its primary flood defence role, flood risk management activities can make a contribution to improving the water environment more broadly and to the achievement of the Government's Biodiversity 2020 targets.'*

*'...working extensively with landowners to make the case for integrating trees and hedges into farms in order to bring multiple benefits to the landowner while also delivering water management objectives for the wider community.'*

*'...we are committed to working with all interested groups to maximise the ecosystem benefits for the catchment as a whole and this includes mitigating flood risk.'*

## **Question 10: "Are there things you think should be done to improve co-ordination of river basin and flood risk management planning?"**

19 respondents provided an answer to this question. Of those the majority agreed that there should be better alignment and co-ordination between the plans. There were several themes where respondents felt that better alignment and co-ordination is needed, these including planning, policy, funding, and programming.

*"Need better alignment between Flood Risk and River Basin Management Plans, both on policy and funding"*

Some respondents highlighted the importance of partnership working, and engagement in general, to improve co-ordination of river basin and flood risk management planning, and one respondent felt that it would have been better if all Lead Local Flood Authorities had agreed to contribute to their respective Flood Risk Management Plan.

*"There is much to commend efforts being made by Risk Management Authorities to work in partnership to deliver maintenance works in the most cost effective way"*

A couple of respondents felt that the national and local flood risk management strategies should more clearly make the links between river basin and flood risk management planning, and, these links should be more clearly identified within the two plans.

*"The National FRM Strategy should clearly make the links between River Basin Management and Flood Risk Management"*

One respondent noted that they were not consulted during the development of the draft Flood Risk Management Plan, and another expressed a view that they wished to be more involved when the plans are updated and reviewed in the future.

### Question 11: "We have proposed a change to the boundary between the Severn and South West River Basin Districts.

**Do you agree this proposed change should be adopted in the final plan?"**

The overwhelming majority of respondents who provided an answer agreed with the proposed change.

One respondent, who answered 'no', felt that the whole of the Bristol Avon and North Somerset Streams catchment should also move into the South West River Basin District, because there are no hydrological or environmental connections between the Bristol Avon catchment and the rest of the Severn River Basin District. In addition, the respondent felt that the existing administrative boundary of the Environment Agency lends weight to the argument that it would be more cost efficient to align the river basins with geographical areas of responsibility.

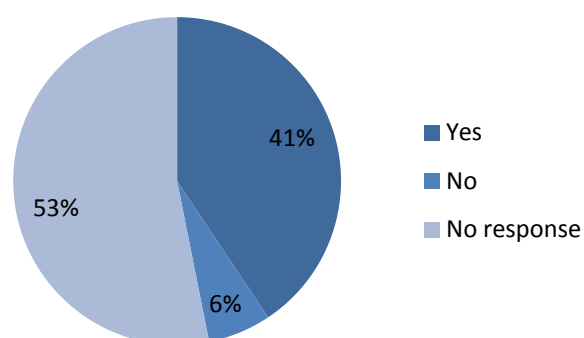


Figure 72 South West responses to question 11

### Additional feedback for the South West River Basin District

Some comments fell outside of the structured questions but were perceived as important feedback that should be considered when making changes to the final plan.

One respondent voiced their concerns over the intentions for the Flood Risk Management Plan and how it would sit in regards to previously published management plans such as the Catchment Flood Management Plan (CFMP) and the Shoreline Management Plan (SMP). It was felt that if it replaced the CFMP then there was a risk that detailed information could be lost.

*"Our view is that the demise of catchment-level plans may represent a risk that that a body of important and detailed information will be lost from the public domain at a time when ever more environmental planning is being conducted at the local landscape or catchment scale."*

There was an underlying concern over the inclusion of measures taken from the multiple Risk Management Authorities. One of the main concerns was that measures supported in documents such as Local Flood Risk Management Plans (LFRMS) and Local Strategy Action Plan (LSAP) were not included in the measures table.

*"The table included within the draft flood risk management plan only identifies the schemes included in the medium term plan and does not identify local schemes to address flood risk that are being funded from alternative sources."*

An alternative response calls for the Flood Risk Management Plan to act as an overarching document supported by locally derived plans such as LFRMS's and LSAP's where they will compliment the Flood Risk Management Plan in key locations. There was also the call for consistency across the river basin district.

*“We feel that the FRMP needs to remain high level and the Local Strategy Action Plans should provide detail of specific scheme proposals. Otherwise, there is a risk that it could duplicate requirements of these and lead to confusion. The LLFA has a responsibility to develop, maintain, apply and monitor a Local Strategy and we were part of the Stakeholder Group therefore, it is essential that the FRMP does not undermine the Local Strategy”*

Another concern raised was how the Environment Agency would monitor progress made against measures within the Flood Risk Management Plan. It was suggested that Key Performance Indicators were used.

*“The Plan contains no key performance indicators for the work to be carried out. Whilst we recognise these will be in place for individual schemes, there are no overarching indicators relating either to people eg communities with flood plans nor catchment health eg no of farms operating under a catchment sensitive farming regime.”*



## Consulting in the South West River Basin District

Staff involved in meetings with stakeholder groups and partners shared information at their meetings and workshops during the consultation period. They attended numerous meetings to highlight and discuss the consultation. Examples include:

**Table 29 High level summary of engagement in the South West RBD**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	400	Examples include: Hampshire Avon Catchment Partnership, Westcountry Rivers Trust (WRT), Somerset Water Management Partnership meeting, Wiltshire Dorset Bournemouth OA and Parish Council, WRFCC, SCC Technical advisory group, SWFRM, West Somerset Drainage boards, Dorset County Council.
<b>Workshop</b>	1	Natural England Wessex, South West Water, South Devon Catchment Partnership - Yealm & Erme Operational Catchments, South Devon Catchment Partnership - Avon, Salcombe & Kingsbridge Operational Catchment.
<b>Email</b>	Multiple	Lead local flood authorities, key stakeholders.
<b>Press release</b>	1	News release: South west media
<b>Conference</b>	1	WRT conference

### 3.10. Thames River Basin District

We received 64 responses to the draft Flood Risk Management plan for the Thames River Basin. Approximately two thirds of them were from catchment partnerships, non-governmental organisations (NGO) and local government. There were several responses from individuals as well as responses from the agriculture, water and navigation sectors.

The nature of the responses varied with some concentrating on single issues whilst others gave comprehensive comments on all of the questions.

The word diagram below illustrates some of the key themes that were raised in the responses.



Feedback came from the following groups:

**Table 30 breakdown of responses by organisation type Thames RBD**

Organisation Type	%	Number of Responses
Individual	15.62%	10
Government, local	39%	25
Environment management (including NGOs)	20.31%	13
Transport/navigation	3.12%	2
Utilities	3.12%	2
Government, national	3.12%	2
Farming/land management	1.56%	1
Other	14.06%	9
<b>Total</b>		<b>64</b>

## Summary of consultation feedback

The following pages summarise for each question the general themes emerging from the consultation and highlights areas that are being taken into consideration for the final FRMP.

### Question 1: “Do you agree that this draft plan sets out the most significant flood risk issues for your area? If not, please explain what you think is missing.”

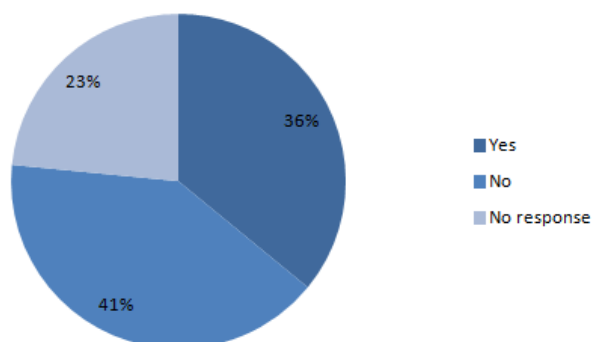


Figure 73 Thames responses to question 1

There were 49 responses to this question with a slight majority (26) raising concerns that the draft plan did not set out the most significant flood risk issues for their area.

Of those that disagreed with the question, most identified that their local flood issues weren't picked up by the plan. Some indicated that it is difficult to appreciate the full picture with regards to flood risk given the absence of information on key types of flooding. Whilst the plan sets out that it covers all sources, it was not generally felt that this was achieved.

For example, some considered the information on surface water to be sparse, and it was not well enough explained to why this was. *“...the document fails to recognise the impacts and interactions between surface water and combined sewage systems with that of fluvial flood risk and consequently estuarine risks.”* Others felt that there wasn't enough emphasis on smaller watercourses, with the focus being too much on the larger watercourses like the Thames.

One response suggested that the responsibilities for LLFAs and local planning authorities (LPAs) in flood management should be better defined in the plan. Others would like to see more joint projects with LLFAs and farmers to jointly manage runoff into rivers.

Some responses specific to London, including the quotes below, highlighted the importance of sewer surcharge in the capital, not only because of flood risk, but the added health risks which come with this source of flooding. It was felt that this needs to be emphasised in the plan.

*“We agree that heavy rainstorms and the resulting flooding from surface water run-off pose the greatest risk to London, largely as a result of the concentration of urban development...”*

*“Surface water drainage in London is managed through the combined sewer network which collects surface water along with foul sewage. This network is susceptible to overloading due to heavy rainfall, which is likely to increase in the future as a result of climate change.”*

### Question 2: “What do you consider to be the highest priorities for managing the risk of flooding in your area?”

There were 51 responses to this question out of 64. Some responses to this question were focussed on local issues, others related to the plan as a whole. Where responses were related to specific locations, there was often concern that these locations did not have specific actions identified in the plan even though they have flooded in recent years.

Four concerns were raised about groundwater flooding and one outlined the potential for increased groundwater flooding in areas where it is proposed that abstractions cease in the future. It was felt that this wasn't suitably addressed in the plan.

The following came up more than once as high priorities:

- flooding to roads and infrastructure
- *“Total catchment approach...to managing risk of flooding.”*
- the importance of avoiding development on floodplains. However, it was also highlighted that in certain areas (with high development pressures) this might not be possible, so flood risk to those developments needs to be affectively addressed
- the value of sustainable drainage systems (SuDS) to slow the runoff from urban and rural areas into rivers
- *“A more coordinated approach between the London boroughs with regard to protection, prevention, response and recovery activities.”*
- natural flood management considerations
- the importance of riparian owners responsibilities, and improving understanding around this
- maintenance of existing defences

### Question 3: “Do you understand the objectives as described in the draft plan? If not, what would help you understand them better?”

There were 46 responses to this question with 39 confirming that they understood the objectives described in the draft plan and *“welcomed the range of objectives that are included in different parts of the plan.”* However, one respondent was overwhelmed by the volume of information in the plan.

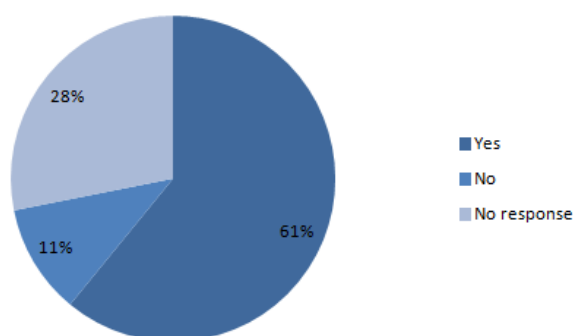
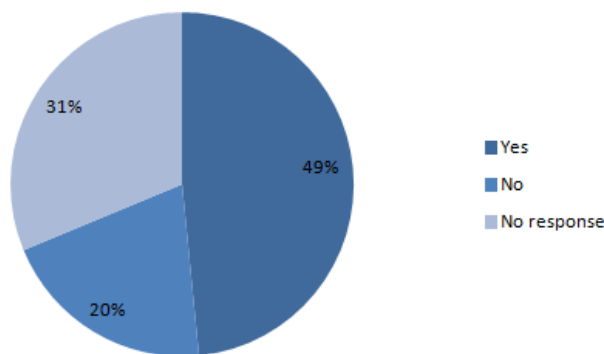


Figure 74 Thames responses to question 3

The following responses will be considered in the review:

- some of the objectives which were put forward in individual catchments could be applicable at the river basin district (RBD) scale for example, *“Several catchments had specific objectives relating to SuDS.....which should also apply throughout the RBD.”*
- feedback highlighted *stronger* links need to be made between objectives and delivery *“We understand the objectives, but feel that some amendments/clarification would be useful to improve validity.”*
- in some catchments, the tables of measures need to record more measures as delivering environmental objectives
- there is too much emphasis on reservoir flooding in the social objectives at the RBD scale
- links between these objectives and those in local flood risk management strategies produced by LLFAs should be improved
- catchment partnerships should be better referenced in each catchment section

**Question 4: “Is the balance right between the ‘social’, ‘economic’ and ‘environmental’ objectives, as explained in the draft plan? If not, what would you change and why?”**



**Figure 75 Thames responses to question 4**

There were 44 responses to this question. The majority of respondents who answered this question felt that the balance of objectives was acceptable. For example, *“We welcome the inclusion of economic objectives to reduce the number of businesses and critical infrastructure affected by flooding from surface water.”*

Those who believed the balance wasn't quite right generally felt that the emphasis on environmental and economic objectives needed to be higher. It was also suggested that the description of the different types of objectives needed to be

better explained. One comment outlined, *“The balance between environment and economic should be more equal if plans are to be sustainable in the long term.”*

In some cases it was also felt that the objectives often don't go far enough to address flood risk because of the use of words like 'promote' and phrases like 'where possible'. For example *“...the plan is only to 'promote' SuDS and to reduce flood risk 'where possible' for new developments. This doesn't seem to go far enough to reduce flooding in the local area.”*

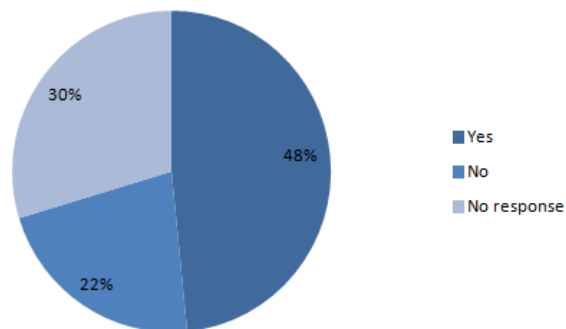
Concerns were raised by some where they thought some individual locations were not given enough emphasis within the plan.

One respondent felt there was not a balance between the objectives, *“Different catchments seem to have taken very different approaches to balancing flood risk with social economic and environmental objectives.”* This respondent also highlighted that there needed to be more linking with the river basin management plan (RBMP) when developing objectives.

**Question 5: “Are there other flood risk management objectives that should be included? If so, please explain what they are and why they should be included?”**

There were 45 responses with the majority indicating that other objectives should be included. It was suggested that *“A more integrated approach to flood risk from all sources would be beneficial.”* Some LLFAs suggested that information from their local flood risk management strategies should be included to give a full picture of flood risk management.

*“It is unclear what form of flooding is being tackled by the objectives and why they have been prioritised; what objectives were considered and how were they prioritised.”*

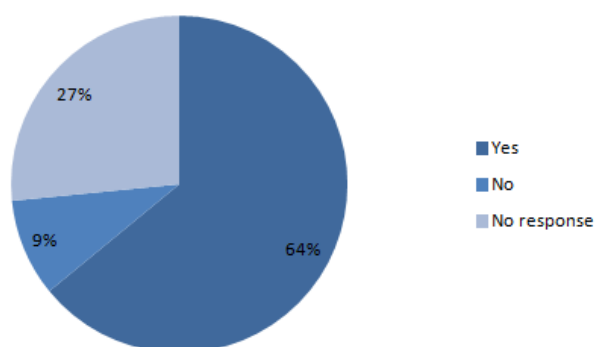


**Figure 76 Thames responses to question 5**

The following are suggested additional objectives which could be included:

- increased emphasis on active river management (for example dredging or bank clearance)
- reference to national resilience programmes and emergency response,
- consideration of rural SuDS
- more information from or reference to local flood risk management strategies
- better planning policy aimed at reducing flood risk and preventing development in and around flood plains
- more emphasis on planning to improve water storage and engagement with water companies
- more commitment to provide or fund physical measures to reduce flood risk
- reference to sustainability, *“An additional objective relating to sustainability should be included to tie together the economic, social and environmental aspects of flood risk management.”*
- creation of floodplain woodland and the planting of hedges and buffer strips on farms to reduce flood risk, *“We feel there is great potential for land use change and management, including the creation of floodplain woodland and the planting of hedges and buffer strips on farms, to reduce flood risk in this river basin district.”*
- partnership working
- mention of home insurance
- interactions between groundwater flooding and other sources, *“Groundwater flooding is mentioned and the impact on other drainage systems, particularly foul sewer networks, needs to be fully appreciated through continued close liaison between risk management authorities.”*
- including the impact on the economy much more strongly
- working with catchment partnerships
- 

**Question 6: “Do you understand the difference between on-going, agreed and proposed measures, as explained in the draft plan? If not, what would help you understand them better?”**



**Figure 77 Thames responses to question 6**

Of the 47 respondents who answered this question, the majority confirmed that they understand the difference between the different types of measures.

The following comments summarise the key themes raised:

*“We understand the difference, although we would welcome the opportunity to engage in ongoing and agreed measures.”*

*“It is not clear the difference between the different approaches and we feel that this would be very confusing to the general public. Better explanations could be given with examples to distinguish between the four approaches and then how each approach links to the other.”*

*explanations could be given with examples to distinguish between the four approaches and then how each approach links to the other.”*

*“The maps could be clearer. Local authority boundaries and major settlements would help people to easily orientate and so better understand the maps.”*

*“We believe this data should feature on the EA website, shown against the catchment maps.”*

One respondent suggested that timescales for proposed measures would be useful.

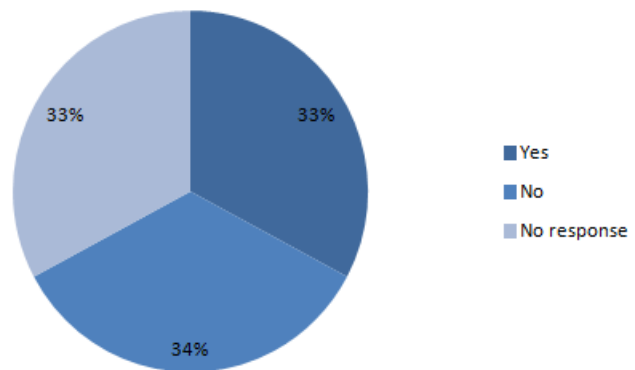
There were specific responses relating to the London Flood Risk Area, the Upper Mole Flood Alleviation Scheme and Thurrock.

**Question 7: Across all proposed, agreed and ongoing measures, the plan describes ‘prevention’, ‘preparation’, ‘protection’ and ‘recover and review’ approaches. “Is the balance right between these different types of approach, as explained in the draft plan? If not, which proposed measures would you change, and why?”**

There were 43 responses to this question and of those who answered this question, there was an even split between those that agreed and disagreed that the balance is right within the plan for the different types of approach.

Ways in which respondents thought the balance could be improved include:

- increasing the number of protection and prevention measures
- more effective forward planning in the response, recovery and review stage
- assessing the opportunities for natural approaches to flood risk management
- naming more organisations, who the Environment Agency can work with in partnership, in the plan



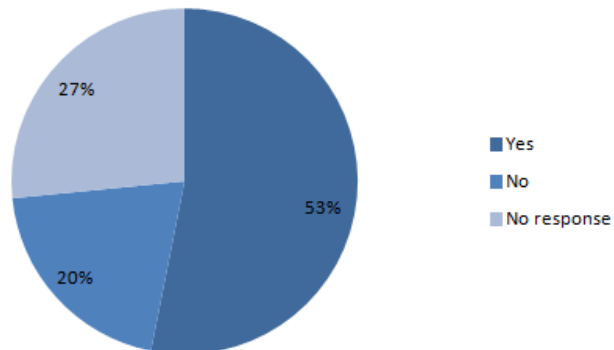
**Figure 78 Thames responses to question 7**

*“The fact that only 40 of the measures listed (12%) are described as ‘protecting from risk’ suggests this approach may not be receiving enough emphasis....there also needs to be much more emphasis on prevention...”*

*“The range of measures varies from high level strategic and aspirational actions to very local specific ones.”*

There were comments relating to the maps being confusing and difficult to interpret. *“The ‘pie charts’ that have been used to show the balance between different measures are confusing since the quadrants shown do not represent the proportions of each approach.”*

**Question 8: “Are there other proposed measures that should be included? If yes, please explain what they are and why they should be included.”**



There were 47 responses to this question with the majority agreeing that there are other proposed measures which should be included in the plan. These responses referred to a mixture of specific locations, and more general comments about the RBD as a whole. For example *“A total approach to rivers should be developed which encompasses flood risk, river basin management plans and catchment management plans.”*

**Figure 79 Thames responses to question 8**

Some of the suggested themes for new measures include:

- the importance of the role of the water industry
- rural SuDS schemes
- cessation of abstraction and its impact on flood risk
- how LLFAs are planning to manage risk from other sources
- emphasis on developments not increasing flood risk, including to wildlife sites
- *“Working with flood groups to gain a fuller understanding of the projects which could be run to mitigate flooding.”*
- more effective forward planning in the response, recovery and review stage,
- maintenance programmes
- *‘... the inclusion of measures which deliver natural flood risk management.’*
- *engaging communities*
- enhancement of public spaces and contributing to the regeneration of areas
- the value of economic activity
- coordination of activities across flood risk management
- sustainable development and land use practices
- land management activities to improve local flood storage and reduce runoff and pollution
- acknowledging all the different types of infrastructure *“For transport infrastructure...refer not just to roads and rail, but acknowledge metro, light rail, tram.”*

As well as these, some respondents also suggested general areas for improvement. These included; communication with recreational and navigational boat users, more detail on specific watercourses rather than high level measures, better linking with LLFA measures, better linking with shoreline management plans, and more emphasis on groundwater influences.



## Question 9: “How can you support the work set out in the draft flood risk management plan to reduce flood risk?”

There were 45 responses to this question. The respondents to the consultation were from a variety of different sectors. Responses varied between localised suggestions and proposals for working together more effectively at a larger scale.

There were several encouraging suggestions which are set out below:

- helping to increase local awareness
- contributing information and expertise about local area – what is happening and what is planned- *“...will continue to provide support by close liaison....to ensure a common, clear appreciation of flooding risk issues and, where there are common interventions, to reach the most effective solutions.”*
- community and landowner engagement to raise awareness- *“...we would wish to maintain this positive working relationship to help reduce flood risk.”*
- work on river restoration projects,
- sharing information from local flood risk management strategies
- developing rural SuDS schemes
- improving modelling information for surface water flooding
- implementing property level protection schemes
- carrying out gully maintenance
- implementing planning policies to manage flood risk
- installation of SuDS schemes on new developments and the highway
- involve local communities to undertake river restoration
- engagement with catchment partnerships- *“The draft plan describes how catchment partnerships will be engaged to support delivery...this is a positive move, but... it must be recognised that the hosting of partnerships cannot continue without funding.”*
- help to develop woodland creation projects
- development of riverside strategies in line with the Thames Estuary 2100 (TE2100) Plan
- sharing of data and information, *“...engage with partners to determine how its planning decisions, land management practices and relationships with local communities and residents can contribute towards better flood risk prevention, protection and preparedness.”*
- work in partnership to help mitigate flood risk to transport infrastructure,
- communication of measures set out in the plan to river users
- flood resilience work to improve flood protection of water supply assets

**Question 10: “Are there things you think should be done to improve co-ordination of river basin and flood risk management planning?”**

There were 41 responses to this question with resounding agreement that there needs to be better coordination between the plans. Quotes taken from the responses provide a representative summary of this below.

**Table 31 Quotes summarising how to improve co-ordination of FRMPs and RBMPs**

<i>“Reduce the repetition in the documents.”</i>	
<i>“I would encourage a joined up approach between these 2 areas.”</i>	<i>“The development of the strategies to deliver...these plans should be integrated.”</i>
<i>“Greater integration of the river basin and flood risk management plans...could streamline objectives and actions to reduce flood risk from all sources, whilst identifying additional benefits...”</i>	
<i>“A mechanism to promote the development of multi objective schemes.”</i>	<i>“We need to ensure continued close liaison of the risk management authorities and partners.”</i>
<i>“In the longer term we feel it would be beneficial to integrate both plans in order to secure an integrated approach to management of the water environment.”</i>	<i>“Whilst good working relationships exist it is not always clear where the boundaries of responsibility exist.”</i>
<i>“There is a cross over and potential for more partnership working if the essence of the 2 types of planning were applied together, especially at that local level with communities.”</i>	<i>“The application for funding from various streams to have similar timeframes and deadlines to allow for the combining projects to deliver flood risk and other water quality benefits.”</i>
<i>“The approach should include ensuring that all actions proposed in the FRMP must demonstrate how they will directly improve the health, quality and resilience of the relevant water bodies.”</i>	
<i>“A strategic approach to catchment management is vital.”</i>	<i>“Greater consideration needs to be given to achieving flood risk objectives through the delivery of catchment based approach (CaBA)...”</i>

## Additional Feedback for the Thames River Basin District

As well as direct responses to the set questions above, there were several responses to the consultation that provided additional feedback about the draft flood risk management plan.

The main themes from the additional feedback were regarding the clarity of measures and how they link with the existing capital investments programme and other associated plans. Additional points that were captured are listed below using direct quotes where possible:

- lack of consistency regarding where multiple sources of flooding are covered, *The FRMPs start by saying that they 'highlight the hazards and risks from rivers, the sea, surface water, groundwater and reservoirs.....' However from the text this does not actually appear to be the case, at least for all areas.*
- more emphasis on defining the risk to communities – or pointing the reader to where more detailed information can be found
- clarity needed around how objectives and measures have been set, *"...it would be more meaningful to set out how various risk management authorities decide on measures and priorities (including coordinated action)..."*
- prioritisation and timescale of measures needs to be clearer
- measures tables should be removed from the text
- there should be more emphasis on assessing progress rather than counting the number of measures
- maps could be improved by including more place names to make them more meaningful
- it needs to be clear where the FRMP fits with other existing plans
- *"...we consider it needs greater content and commitment with respect to maximising the biodiversity benefits, and minimising any negative impact.."*
- needs to better address the socio-economic effects on the agricultural sector
- *"The FRMP should set an objective to ensure a robust revenue maintenance programme exists."*
- the geographical location of individual measures needs to be clearer
- it needs to be clearer how the FRMP links with the capital investment programme
- detail on the rainfall patterns and volumes in the Thames RBD
- some suggested additional text for the land use, economic activity, recreation, soils, water and flood risk management systems and drainage sections
- there needs to be a better description of ongoing, agreed and proposed measures (with examples)

## Consulting in the Thames River Basin District

Our approach to promote the consultation locally was predominately via proactive email, adding details into existing correspondence and by promoting the consultation at existing meetings with our political stakeholders. Staff involved in meetings with stakeholder groups and partners shared information across 22 meetings and 10 workshops to highlight and discuss the consultation. There were a handful of proactive workshops with catchment partnerships, organised specifically to promote the consultation and the plan.

The Environment Agency also promoted the consultation locally through:

two sets of e-mails to 135 MP's across the Thames river basin district, one at the start of the consultation and a reminder before the consultation closed. These invited MPs to take part in the consultation and explained how they or their constituents could get more information.

4 tweets from the @EnvAgencySE account, which has over 17.5K followers. These were put out at the start and end of the consultation. The tweets were broadcast further than the Environment Agency followers as they were re-tweeted a number of times.



**Table 32 High level summary of engagement in the Thames RBD**

Type of Event	Number of Instances	Sector Stakeholders Involved
<b>Meetings</b>	22	Colne Valley Groundwork Trust, Upper Thames partnership, North-West Kent Countryside Partnership, University of the third age, Marsh Dykes and Thamesmead, Thames Regional Flood and Coastal Committee (RFCC), Lower Lee Pollution Monitoring Volunteers, Brent Catchment Partnership, Public meeting, Catchment Partnerships in London, Medway Catchment hosts meeting, Beult & Middle Medway CIG hosts, South East River Trust, Medway Catchment & North Kent Catchment hosts, Medway Catchment, Beult CIG meeting, Mole Catchment partnership steering group, North Kent Catchment Partnership, Friends of the Westbrook Stream, Roding Beam and Ingrebourne Catchment Partnership, Thames Estuary Partnership, Your Tidal Thames steering group, North Herts District Council, Beane and Mimram Partnership Core Group, Luton Lea Catchment Partnership, Stort Partnership, Wey Landscape Partnership, Green Godalming group, Farnham rivers group, Wey catchment partnership , Kent Climate Change Network, Kent Planning Policy Forum, Thames Water, Landscape institute, Chilterns Conservation Board (and LPAs),  Riverfly National Conference for coordinators and trainers.
<b>Workshop</b>	10	Urban Design London, North-West Kent Countryside Partnership, Medway Catchment, Eden & Upper Medway CIG stakeholders, Medway Catchment, -Teise CIG stakeholders, Medway Catchment, Beult CIG stakeholders, Medway Catchment -Middle Medway CIG stakeholders, Medway Strategic Partnership, KCC - Kent Environment Strategy review, Thames Liaison Panel, Natural England, Water industry
<b>Email</b>	multiple	Lead local flood authorities, key stakeholders.
<b>Phone</b>	2	Eden & Upper Medway Catchment Improvement Groups (CIGs), Southern Water
<b>Social media</b>	Multiple	Public and stakeholders
<b>Briefing</b>	1	Drain London board members

## 4. Consultation on Strategic Environmental Assessment

Of those replying to the consultation, approximately two thirds specifically answered the questions about the Strategic Environmental Assessment (SEA) as reported in the Environmental Report. The majority were from local government and government bodies, the environment management sector (including Catchment Partnerships, Wildlife and Rivers Trusts). The remaining comments came mostly from individuals with smaller numbers from water companies, local flood groups, Internal Drainage Boards, energy companies and other businesses.

Three separate questions were asked about the SEA:

**1. Do you agree with the conclusions of the environmental assessment?**

To this question, more than 3 times as many responded 'yes' compared with 'no' with many respondents providing justification for their response.

**2. Are there any further significant environmental effects of the draft plan which you think should be considered?**

To this question, marginally more respondents answered 'no' than 'yes'. Many respondents provided further detail in their response.

**3. Are there further mitigations or opportunities that should be considered for the plan?**

To this question, similar numbers answered 'yes' to those that answered 'no'. Many respondents provided further detail in their response.

There was a great deal of cross over between the questions, as well as relevant comments to the SEA provided in responses to other consultation questions. The feedback has been combined within the following summary and topic headings.

### 4.1. Environmental Report Conclusions

Of those who responded, many more agreed with the conclusions of the environmental assessment than disagreed. A few comments were raised that the measures in the draft FRMP lacked descriptive detail which increased uncertainty about the likely effects and prevented full support for the conclusions in the Environmental Report.

Concerns were also raised that the SEA did not appear to have been fully integrated with the FRMPs and had not been able to influence them. Some responses wanted more detail on how the draft FRMPs had considered other plans and how the final FRMPs would influence other plans such as local development plans.

### 4.2. Approach to SEA

A few respondents had concerns that the approach of combining effects across management catchments, risked presenting an overall neutral effect and disguising localised negative or positive effects. On a similar theme, several comments from the environmental management sector requested a detailed breakdown of the negative effects of individual measures in the final plan on specific sites including European designated sites, Sites of Special Scientific Interest (SSSIs) and

other important habitats. Other responses recognised that a much greater level of assessment of environmental effects would be required for the projects emanating from the measures in the final plan.

A number of respondents felt that the baseline for the assessment should have been widened to include locally-important sites and features in addition to nationally and internationally protected sites and features. Specifically respondents requested consideration of National Character Areas for landscape, all heritage assets, local wildlife sites and specific habitats such as ancient woodland and saline lagoons.

Some respondents felt that the assessment was lacking or required greater detail in a number of areas including:

- groundwater
- bathing waters
- shellfish
- coastal processes
- food production
- canoeing and leisure boating
- fish and fish passage
- spread of invasive species
- human health
- electricity infrastructure
- landscape
- heritage
- wildlife adaptation potential in a changing climate

In addition to the above list a few respondents also wanted to understand how the effects presented in the SEA would be affected by climate change.

Several respondents requested further detail on how monitoring would pick up both the predicted and unforeseen effects of the plan.

### 4.3. Opportunities

A number of responses raised opportunities for the plan to improve the environment through natural flood management options which could create new habitat such as wetlands and woodland as well as provide greater opportunity for recreation which would in turn improve human health. Several responses also provided lists of potential risks and opportunities to existing designated sites associated with the measures presented in the draft plan.

### 4.4. Proposed Habitat Regulations Assessment (HRA)

Some responses from government bodies and the environmental management sector in particular commented on the planned approach to the Habitats Regulations Assessment (HRA). These included comments on the timing of the HRA with some concerns that the absence of an HRA at draft plan stage meant less clarity on the effects on European designated sites and a missed opportunity to influence the measures in the draft plan. Other comments included the need to consider new and proposed European sites, offshore marine designations and Ramsar sites and a request for one cross-border HRA for the Severn River Basin District.

The responses also raised concerns about an over-reliance on the conclusions in existing HRAs with a request to ensure these assessments remain valid. Some respondents also suggested that the HRA should present the effects of measures on individual sites rather than bundles of measures at a catchment scale. Respondents raised the need for an in-combination assessment to determine the combined effects from neighbouring FRMPs as well as the plans of others.

A number of respondents also raised concerns that the assessment implied a potential adverse effect on some European sites including the Humber Estuary and some freshwater sites in the South East River Basin District. Clarity was also sought on whether measures proposed in England could affect European sites either partly or wholly in Wales.

## 5. Next steps

Every response to the consultation has been thoroughly read, and the comments reviewed to consider how they might influence the forthcoming flood risk management plans and the future approach to planning and implementation. This has taken place at a national level and a local level, depending on the nature of the consultation comments - involving partners and respondents where necessary.

Further information on how consultation feedback has helped us finalise both the flood risk management plans and river basin management plans can be found in '*Acting on your responses to the draft update to the river basin management plan and flood risk management plan consultations 2015*', due to be published on the 30 October 2015.

Flood risk management plans (within England) will be published in December 2015.



# Annex 1. List of consultation participants

The following table identifies the organisations who took part in the consultation. Individuals are not included, and where some organisations replied separately to more than one river basin district, they are included only once, unless they are specifically identified as a local part of a national organisation.

Organisation
Affinity Water Ltd
Age UK
Alfriston Parish Council
Alt/Crossens Catchment Partnership
Amenity Forum
Arnside and Silverdale Area of Outstanding Natural Beauty Partnership
Arun and Rother Rivers Trust
Arundel Town Council
Association of Drainage Authorities (ADA)
Association of Electricity Producers
Association of Greater Manchester Authorities (AGMA)
Birmingham City Council
Bishops Tawton Parish Council
Bolton Metropolitan Borough Council
Borough Council of King's Lynn and West Norfolk
Breckland District Council
Bristol City Council
Broads Authority
Buckinghamshire County Council
Burnley Borough Council
Bury Council
Cambridgeshire County Council
Campaign to Protect Rural England (Lancashire Branch)
Catchment Partnership for Cornwall
Central Bedfordshire Council
Cherwell District Council
Chichester District Council
Climate Change Support Programme (CLASP )
Coast and Countryside Planner
Coastal Groups England
Copeland Borough Council

Cornwall Council
Cotswolds Conservation Board
Country Land and Business Association (CLA)
Coventry City Council
Crawley Borough Council
Cuckmere Flood Forum
Derbyshire County Council
Devon County Council
Downham Market Group of Internal Drainage Boards
East Riding of Yorkshire Council
Energy UK
English Heritage
Exmoor National Park Authority
Farming and Wildlife Advisory Group (FWAG) South West
Forestry Commission England: North West and West Midlands
Fylde Borough Council
Gateshead Council
Gloucestershire County Council
Gloucestershire Rural Community Council
Graveley parish council
Greening Godalming
Halton Borough Council
Hampshire and Isle of Wight Wildlife Trust
Hampshire Avon Catchment Partnership
Hampshire County Council
Henrietta Park Residents Association
Herefordshire and Gloucestershire Canal Trust
Hull City Council
Idle Catchment Partnership, consisting of; Nottinghamshire Wildlife Trust, Royal Society for the Protection of Birds (RSPB), Environment Agency, Severn Trent Water, Natural England, Angling Trust, Campaign for the Farmed Environment (CFE), National Farmers Union (NFU), Forestry Commission, Canal and Rivers Trust, Country Land and Business Association (CLA), National Trust, Sherwood Forest Trust, Nottinghamshire County Council, UK Coal, Isle of Axholme and North Nottinghamshire Water Level Management Board, local parishes, local authorities, local landowners and businesses and local community representatives.
Isle of Wight Council
Kent County Council
Knowsley Metropolitan Borough Council
Lake District National Park
Lancashire County Council
Lancaster City Council
Leicester City Council
Loddon Catchment Partnership

London Forum of Amenity and Civic Societies
Loddon Valley Residents Association
Long Man Brewery
Marine Management Organisation (MMO)
Mersey Estuary Catchment Partnership
Middle Level Commissioners
Midland Water Power
Midland Wind and Water Mills Group and traditional Corn Millers' Guild
National Farmers Union (NFU)
National Trust
Natural England
Natural Resources Wales (Dee)
New Forest Verderers
Newcastle City Council
Norfolk County Council
North Devon Catchment Partnership
North Somerset Council
North West North Wales Coastal Group
Northampton Borough Council
Northamptonshire County Council
Nottingham City Council
Nottinghamshire Wildlife Trust
Pupils to Parliament
Ribble Life Partnership - Ribble Fisheries Consultative Association
Ribble Trust
Ribble Valley Borough Council
River Chess Association
Rivers Return Catchment Partnership
Rochdale Borough Council
Royal Borough of Windsor and Maidenhead
Royal Society for the Protection of Birds (RSPB)
Royal Yachting Association
Sefton Council
Sembcorp Bournemouth Water
Severn Rivers Trust
Severn Trent Water
South West Water
Southend Borough Council
Southern Regional Flood and Coastal Committee (RFCC)
Southern Water
St Helens Metropolitan Borough Council
Stanstead Abbots Parish Council
Strine Internal Drainage Board

Suffolk Coastal District Council
Swallowfield Flood Resilience Group
The Amenity Forum
The Manchester Ship Canal Limited - Peel Ports Group
The North Walsham and Dilham Canal Trust
The OnTrent Initiative
The Rivers Trust
The Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire
Thurrock Borough Council
Tidal Lagoon Power
Transport for London
United Utilities plc
Urban Vision
Warrington Borough Council
West Country Rivers Trust
West Sussex County Council
Wild Trout Trust
Wirral Council (Regeneration and Environment)
Witham First District Internal Drainage Board
Woodland Trust
Worcestershire Wildlife Trust
Wyre Rivers Trust and Wyre Waters Catchment Partnership
Yorkshire Wildlife Trust

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