

Local Flood Risk Management Strategy Consultation Report 27/11/2020

1. The draft City of London Local Flood Risk Management Strategy was approved for consultation by P&T Committee on 6th Oct 2020.
2. The public consultation took place between 19th Oct 2020 to 27th Nov 2020.
3. The following consultation documents were made available on the City of London Corporation website:
 - Local Flood Risk Management Strategy for consultation 2021-27
 - Strategic Environmental Assessment
 - Equality Impact Screening
4. Key stakeholders were contacted directly via email and invited to comment. This included other risk management authorities, statutory bodies, riparian owners, neighbouring LLFAs and regional bodies - see appendix 1 for list of consultees.
5. The consultation was publicised through partnership groups, London Climate Change Partnership, LoDEG and London Councils.
6. A total of 29 responses were received from 10 different respondents, and relevant changes were made to the draft LFRMS. A summary of the comments and the changes made is set out in table 1.
7. The final strategy was approved by the Flood Risk Steering Group on 2nd Dec 2020 and recommended for adoption by the City of London Planning and Transportation Committee in February 2021.

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Table 1: Consultation responses and changes to the draft LFRMS

	Name	Organisation	Comment summary	Response
1	Richard Snowdon	Honourable Society of the Inner Temple	Note the effect of climate change on flood risk and the lack of suitable flood defences at Temples. Note the intention to provide guidance on suitable measures for historic fabric of the City. Await results in 2023.	Comment noted. No change to LFRMS
2	Lucinda Robinson	Marine Management Organisation	Provides list of the relevant policies in the draft South East Inshore Marine Plan for review	Comment noted. There are no conflicts between the marine Plan policies and the LFRMS No change to LFRMS
3	Lucinda Robinson	Marine Management Organisation	Page 34 recommend mention of the draft South East Marine Plan in Appendix 1 Legislative context	The draft South East Marine Plan has not been included since it is a draft plan at this stage. The Marine Management Organisation has been added to the Risk Management Functions in the City table on page 35
4	Sharon Jenkins	Natural England	Defines statutory purpose of Natural England and confirms that Natural England have no comment to make on this consultation	Response noted No change to LFRMS
5	Andrzej Nowosielski	Thames Water	In the paragraph 5.1.2 where you mention “We will need to reduce the speed and quantity of rainwater entering drains” As well as the solution you put forward here (SuDS), I think it could be added that new development and	Wording in para 5.1.2 altered to read: “We will need to reduce the speed and quantity of rainwater entering drains, through the implementation of Sustainable Drainage Systems (SuDS) wherever possible, <u>reductions</u>

			renovation of buildings should address where possible reductions to peak flow, such as storage, which would also reduce the speed and quantity of rainwater entering drains	<i>in peak flows and storage</i> to reduce the risk of sewers surcharging
6	Andrzej Nowosielski	Thames Water	It may be built into the way that these strategies are implemented but there is no mention of work done by your neighbouring boroughs	An additional paragraph has been added to the Forward emphasising our commitment to partnership working with LFFAs and other risk management authorities
7	Andrzej Nowosielski	Thames Water	Generally, a well expressed and presented strategy	Comment noted No change to LFRMS
8	Paul Baker	LB Hammersmith & Fulham	No detailed comments on the LFRMS document but I do like the way the document is set out so clearly and it is easy to navigate your way through each section.	Comment noted. No change to LFRMS
9	Patricia Cuervo	Royal Borough of Kensington and Chelsea	I think it is a clear document which shows the correct amount of information to understand flood risk in the City. The text is clear and accessible which is difficult in this type of documents so well done to you and the team. I like the fact that you have related the objectives and measures to those within the Climate Action Strategy and the FRMP. I think it should be also future proof for	Comment noted No change to LFRMS

			when the FCERM action plan comes along	
10	Patricia Cuervo	Royal Borough of Kensington and Chelsea	The only thing that I think may be missing is information about how you are going to report the monitoring of the strategy. Will it be through the AMR (through Planning annually) through the monitoring of the Climate Action Strategy, or some other way?	An additional paragraph has been added 7.3 stating that <u>“Progress in implementation of the proposed measures will be overseen by the officer led Flood Risk Steering Group. Periodically progress against the LFRMS objectives and Climate Action Strategy aims will be made public through reporting to the City Corporation’s Planning and Transportation Committee. Reporting of progress to the Environment Agency/ Defra will be carried out on request – normally on an annual basis.”</u>
11	Patricia Cuervo	Royal Borough of Kensington and Chelsea	Also, and this does not need to be on the strategy itself, it may be useful to see what you have done so far since the LFRMS was first adopted in 2015. You have done a lot of good work and you should shout out about it	Comment noted Progress since 2015 will be included as an appendix to the Planning & Transportation Committee report seeking adoption of this strategy
12	Natasha Gibbs	Environment Agency	Section 1.1 Figure 1 - Does this include SW FR from only a certain event? As its missing some 1in1000 extent in the north of the borough	This map shows the City Flood Risk Area from the Local Plan policies map which is based on a 1 in 100 annual probability + 40% climate change. Figure 1 caption has been amended to read Figure 1: Flood Risk in the City

				of London <u>from Local Plan Policies map</u>
13	Natasha Gibbs	Environment Agency	Section 3.3 Local examples of SuDS - could a reference to how this is being monitored or captured be added if available	An additional sentence has been added to the Local examples box stating that <u>Monitoring of the impact of SuDS secured through the Planning System is underway and will be reported to the City's Officer level Flood Risk Steering Group</u>
14	Natasha Gibbs	Environment Agency	Section 3.3 After the catchment maps, maybe a reference to the effect on SW FR for CoL and reference working with partners (LLFAs and TW) around this.	An additional paragraph has been added to the forward <u>Flooding does not respect local authority boundaries so the flood risks in the City are influenced by policies and actions implemented in other Lead Local Flood Authority (LLFA) areas. The City Corporation is committed to working in partnership with LLFAs Thames Water and other risk management authorities to collectively address the flood risks we face.</u>
15	Natasha Gibbs	Environment Agency	Sections 4 and 5 Objectives and Measures: We may need to reference that the measures relate to the SW FRA for London covering CoL, though include weighting for flood risk overall for City of London	A sentence has been added stating that <u>These measures cover surface water, sewer surcharge, river and coastal flood risks for the Square Mile</u>
16	Natasha Gibbs	Environment Agency	Para 5.6.3 Could remove these responsibility references as they will be included in other	Paragraph 5.6.3 amended to read: "During the latter stages of a major flooding incident (the recovery period and return to normality) the City

			documents (MAFP and Major Incident Plan)	Corporation may be able to provide services and staff to assist with <u>a range of issues (see Multi Agency Flood Plan for details)</u> " the detailed list has been removed
17	Natasha Gibbs	Environment Agency	Para 6.1 Use of word multiples? Has definitive trigger been agreed internally for CoL, or is it just more than 1 property will trigger a S19?	Amendment made for clarity 5.6.4 Where multiple properties are <u>more than one property is</u> affected by a single source of flooding, the City Corporation will investigate the causes and impact of flooding and prepare a report outlining any actions to reduce the risk of reoccurrence.
18	Natasha Gibbs	Environment Agency	Remove EA reference - resilience measures are hard to fund in projects as the main option (as we found out) as they don't stop flooding, rather decrease effects on property when flooding	Reference to EA removed from 6.1 (4)
19	Natasha Gibbs	Environment Agency	The TRBMPs and FRMPs are reviewed every 6 years under the flood risk regs, whilst the FRMS doesn't have a specific timeline for update, they're required under the FWMA. Change 5 to 6 years in reference to keep in line with use of Objs and measures under FRMP	Timescale in para 7.4 changed to 6 years
20	Natasha Gibbs	Environment Agency	Add link to those local CoL plans/policies if available online	The City Corporation's website policy does not allow links in this type of document No change made to LFRMS

21	Tom Campbell	Environment Agency	<p>It's great to see the Thames Estuary 2100 requirements for the City of London referred to throughout the strategy, specifically the need to raise tidal defences in 2065 and 2100.</p> <p>It's also good to see the production of the Riverside Strategy included as an outcome for this year too.</p>	<p>Comment noted No change to LFRMS</p>
22	Tom Campbell	Environment Agency	<p>I wondered however whether there is something missing around implementation of the Riverside Strategy following its completion, principally around ensuring development applications consider the information and guidance outlined within the Riverside Strategy, but also actions around engaging with landowners on its contents and recommendations.</p>	<p>Paragraph 5.1.1 has been amended as follows: Working with <i>developers, landowners</i> the Environment Agency <i>and others</i> to implement the Thames Estuary 2100 Plan,</p>
23	Michael Atkins	Port of London Authority	<p>The PLA supports the reference under Measure two of the strategy which states that by quarter two of 2021 the city of London Corporation will have prepared a riverside strategy which will drive forward the requirements of the Thames Estuary 2100 Plan to reduce the risk of flooding whilst unlocking sustainable growth</p>	<p>Comment noted PLA will continue to be consulted as appropriate. No change to LFRMS</p>

			opportunities along the Thames in the Square Mile, including protecting heritage assets. The PLA request to continue to be consulted on the proposed Riverside Strategy at the appropriate time, particularly with regard to any specific proposals on or alongside the Thames within the City of London.	
24	Lauren Wilkinson	LB Southwark	We broadly agree with the approach taken to the Local Flood Risk Management Strategy Comments made in relation to areas of clarity and proofing. In paragraph 1.1 it says" at some risk from river flooding", should this be tidal or flooding from rivers and seas for clarity and accuracy	Paragraph 1.1 amended to read The City is at relatively low risk of flooding with specific areas at some risk from <u>tidal and</u> river flooding and surface water/sewer flooding (Fig 1).
25	Lauren Wilkinson	LB Southwark	Para 1.3 the first word should be tackling not tacking	Correction made
26	Lauren Wilkinson	LB Southwark	Para 3.2 Flood and tidal risk it would be useful to include a map of modelled breach extents. Has latest EA product 4 data been used? It would be useful if this could be set out	Modelled tidal breach extents map added
27	Lauren Wilkinson	LB Southwark	Para 3.3 Surface water and flood risk it would be useful to reference Critical Drainage Areas, including a map of these areas	The City corporation considers the whole of the city to be a critical drainage area due to the interconnected combined drainage

				network. Reducing volumes and speeds of surface water entering the drainage network is critical throughout the City since it could result in surcharges elsewhere No change made to LFRMS
28	Lauren Wilkinson	LB Southwark	On page 14 the hyperlink does not work please review	Hyperlink renewed
29	Lauren Wilkinson	LB Southwark	It could be useful to have a list of figures, maps and tables for reference	We will consider including this in the final adopted version

Appendix 1 List of consultees

Cheapside BID
City Bridge Trust
City of London Police
City of London School
City of Westminster
City Property Association
Diocese of London Church of England
Environment Agency
GLA
Highways England
Historic England
Historic Royal Palaces
Inner Temple
LB Camden
LB Hackney
LB Hammersmith & Fulham
LB Islington

LB Lambeth
LB Southwark
LB Tower Hamlets
London Councils
Marine Management Organisation
Middle Temple
Museum of London
Natural England
Network Rail
Port of London Authority
RB Kensington & Chelsea
Thames Water
The Aldgate Partnership
The Mermaid Theatre
Transport for London
UK Power Networks
Vintners Hall