

Committee(s): Planning & Transportation Committee – for decision	Dated: 29/06/2021
Subject: Riverside Strategy for public consultation	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1 People are safe and feel safe 11 We have clean air, land and water and a thriving and sustainable natural environment 12 Our spaces are secure, resilient and well maintained
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of: Gordon Roy, Environmental Resilience Director	For Decision
Report authors: Holly Smith, Tim Munday and Janet Laban. Environmental Resilience Team, DBE	

Summary

The Environmental Resilience team in DBE has been developing a riverside strategy as one of the measures from the Local Flood Risk Management Strategy (LFRMS) 2021-27 as approved by Planning & Transportation committee on 16th February 2021. This report is seeking approval for the Environmental Resilience Team to continue to progress the Riverside Strategy and to put the City of London's draft Riverside Strategy (Appendix A) out to public consultation to obtain the views of external stakeholders and users of the riverside. Once the public consultation is complete and comments considered, the Riverside Strategy will be brought back to this committee for adoption.

This City Riverside Strategy provides a roadmap to guide the City of London Corporation as Local Authority and Lead Local Flood Authority (LLFA) for the Square Mile. Our aim is to ensure that the City remains at low risk of flooding throughout this century and beyond, taking account of the predicted changes in sea level rise as a result of climate change. The options set out in this strategy will be reviewed at least every 10 years in the light of new evidence and may change in the future.

Recommendation(s)

Members are recommended to:

- Agree that the Riverside Strategy continue to be progressed by the City Corporation and,
- Endorse the draft Riverside Strategy to be sent out for public consultation for 6 weeks.

Main Report

Background

1. The Environment Agency led Thames Estuary 2100 Plan (TE2100) identifies actions that will need to be taken during this century to protect the land adjacent to the tidal Thames from flood risk. This area, including parts of the City, is protected from severe tidal flooding by the Thames Barrier and the other estuary defences. However, climate change impacts such as sea level rise and the prevalence of more extreme weather events mean that additional local and estuary-wide protection will be needed later this century.
2. Within the City the TE2100 plan identifies the need to raise flood defences to 5.85m AOD (above ordinance datum) by 2065 and 6.35m AOD by 2100. For the City's riverside this means raising parts of the flood defence by up to 1m although some sections are already at the required level for 2100. The adaptive pathways approach adopted in the TE2100 plan links the flood defence raising to sea level rise. Through the TE2100 ten -year review it is looking increasingly likely that these dates will be brought forward since sea level rise is accelerating faster than anticipated.
3. This defence raising will have an impact on riverfront structures and walkways, on views of the river from the riverside walk and from nearby buildings. These impacts will need to be managed in a way that integrates the raised defences with the wider riverside environs. It also presents opportunities to enhance the user experience of the riverside, improve opportunities for biodiversity and highlight the historic importance of the City's riverside. Planning now will enable the most cost-effective options to be implemented in a pro- active way, thus maximizing the potential opportunities associated with programmed works.
4. The Environmental Resilience team in the Department for the Built Environment (DBE) has been developing a riverside strategy to interpret the TE2100 plan at a local level. This is one of the measures from the statutory Local Flood Risk Management Strategy (LFRMS) 2021-27 as approved by Planning & Transportation committee on 16th February 2021.

Current Position

5. This draft City Riverside Strategy provides a roadmap to guide the City of London Corporation as Local Authority and Lead Local Flood Authority (LLFA) for the Square Mile. Our aim is to ensure that the City remains at low risk of flooding throughout this century and beyond, taking account of the predicted changes in sea level rise as a result of climate change. The options set out in this strategy will be reviewed at least every 10 years in the light of new evidence and may change in the future
6. The City of London is one of the first local authorities along the Thames Estuary to develop a Riverside Strategy in line with the TE2100 plan. The City Corporation received funding from the Thames Regional Flood and Coastal Committee to assist with the development of this strategy as a pilot for riparian LLFAs along the Thames Estuary. We have also participated in the Design Council's "Design in the Public Sector" programme (sponsored by the Local

Government Association) to improve the draft strategy. As a trail blazer in this area, there is a lot to be learned and disseminated to other local authorities who will be developing Riverside Strategies in the near future.

7. The Environmental Resilience Team has developed this draft strategy taking account of internal consultation with colleagues and feedback from the Environment Agency. We are now seeking approval for public consultation with external stakeholders including statutory bodies such as the Port of London Authority (PLA), the Mayor of London and the Marine Management Organisation (MMO), riverside users, riparian owners and any other interested parties. As mentioned previously, the City is the first local authority to produce a riverside strategy to tackle sea level rise, so receiving comments from external stakeholders will be very useful to the development of the strategy.
8. The draft Riverside Strategy (Appendix A) provides a mechanism for incremental flood defence raising exploiting opportunities to incorporate raising into planned works where possible for example through planned development at riparian sites or routine maintenance. The strategy also includes a series of design policies to ensure that such raising is not detrimental to the experience and functioning of the City's riverside.
9. The Thames Barrier currently protects Central London from river flooding and will continue to do so into the future. Given this protection, the fundamental need for upstream defence raising and a Riverside Strategy has been considered and discussed as part of internal consultation. The primary function of the Thames Barrier is to prevent tidal flooding in London, and it is currently closed when water levels due to high tides are forecast to overtop the river flood defences upstream of the Barrier. High water levels in the tidal Thames are increasing as a result of climate change resulting in more frequent barrier closures. A limit of 50 closures per year on average has been set to allow sufficient time for sustainable management of the Thames Barrier and to reduce navigation impacts. Raising the statutory heights of local flood defences along the Thames will be needed to manage the frequency of barrier closures by allowing higher water levels to pass up the Thames thus prolonging the life of the existing barrier. As water levels increase further, a major upgrade or replacement of the Thames Barrier will be required to protect London in the future. These options are being considered in the TE2100 Plan.
10. Another issue that has been raised through internal consultation is how the work required to *implement* the Strategy will be funded and who is responsible for the works. The Metropolis Management (Thames River Prevention of Floods) Amendment Act 1879 requires riparian owners to carry out flood works maintaining the flood defences that they own. For the City's short stretch this would apply to over 20 riparian owners including the City Corporation as landowner of riparian properties.
11. The costs for each riparian owner will vary depending on the length of flood defence, the level of raising required, the opportunity to incorporate raising into other planned works and the degree to which they incorporate other benefits. Other potential options for funding include the use of planning obligations applied to all areas that would benefit from the improved flood defences or use of the Community Infrastructure Levy. Alternatively, the flood defence raising could be

centrally funded as a nationally significant infrastructure project or through flood defence grant in aid with contributions from beneficiaries.

12. Exploration of the need for and funding of the TE2100 proposals is outside the scope of this Riverside Strategy and will be considered through the 10-year review of the TE2100 Plan. The City Corporation will seek to carry out a cost benefit analysis for some City Corporation owned sections of the flood defence. This will provide evidence for funding discussions, and a realistic picture of potential costs to riparian owners of implementing the TE2100 Plan, to feed into the TE2100 review consultation in early 2022.
13. Some riparian owners may challenge the legal basis of this requirement and the degree to which other TE2100 planned works such as replacement of the Thames Barrier should prevent the need for local defence raising. The logistics of ensuring that the whole of the flood defence is raised to the required level and connected to adjacent stretches will be a challenge. There is a danger that lack of funding will result in riparian owners failing to adequately complete this task. There are also challenges in establishing ownership and riparian responsibility, particularly where flood defence structures are not associated with adjacent buildings or extend over the riverbed or where lease arrangements are in place.

Options

14. The main alternative option to progressing the City's Riverside Strategy would be to challenge the TE2100 Plan through their public consultation in early 2022. The City Corporation's Local Plan 2015, draft City Plan 2036 and Local Flood Risk Management Strategy 2021-27 all support the TE2100 Plan. Both the adopted 2015 Local Plan and the draft City Plan refer to the need for flood defence raising and require new development along the City's riverside to be designed to enable future flood defence raising, noting the responsibility of riparian owners for the maintenance and enhancement of flood defences.
15. The preferred option is to progress the City's Riverside Strategy and share our learning from this with other riparian LLFAs providing protection for the whole Thames Estuary to 2100 and beyond. As LLFA we believe that the TE2100 Plan provides the best option for protection of the whole Thames Estuary. A more appropriate response to the TE2100 review would be to challenge the funding mechanism for implementation and explore other options for funding.

Proposals

16. It is proposed that the City Corporation continue to progress the Riverside Strategy.
17. It is proposed that the draft Riverside Strategy go out for public consultation. The strategy and associated documents will be made available on the City Corporation's website along with a StoryMap providing an engaging introduction to the strategy. Please contact the Environmental Resilience Team if you would like to view the draft StoryMap. The strategy will be sent to interested stakeholders including the Environment Agency, Mayor of London and other

statutory consultees; riparian owners, businesses and residents; and users of the river and riverside walk

18. It will be out for consultation for 6 weeks during which time the Environmental Resilience team will be available for meetings and discussions with stakeholders.
19. Comments made during the public consultation will be taken into account in finalising the strategy. The final strategy will be brought back to the Planning and Transportation Committee and Policy & Resources Committee for approval for adoption.

Key Data

20. An extensive desktop study was undertaken (including commissioning a UAV drone survey) to help identify the scale of the challenge faced along the City's 1.5 mile stretch of riverside. The research and evidence have informed the Implementation Approach and Design policies set out in this strategy. Appendix 1 of the draft strategy provides detailed maps and assessment of the following aspects:

- Raising requirements – end of Stage 2 (2065)
- Raising requirements - end of Stage 3 (2100)
- Non - developable sites
- Historic environment
- Land use and ownership
- Access to the riverside
- River safety
- Natural capital and biodiversity
- Public realm furniture
- Lighting

Corporate & Strategic Implications

21. **Strategic implications** - The City Corporation's Climate Action Strategy (CAS) 2020-2027 includes a strong focus on Climate Resilience against the six climate risks that the City faces:
 - Flood risk
 - Heat stress
 - Water resources
 - Natural capital
 - Pests & diseases
 - Food & trade
22. Implementation of this strategy will require an integrated approach so that solutions for each risk incorporate responses to other risks where possible. For example, measure to address flood risk on the City's riverside, should also incorporate greening to reduce heat stress; taking care to choose suitable plants which improve natural capital and biodiversity and are resistant to emerging pests and diseases.
23. The CAS approach sits well with the TE2100 Plan riverside strategy approach. This integrates improvements to flood risk management defences into wider redevelopment, enhancing the social, environmental and commercial aspects of the riverside. The

Environment Agency is encouraging councils and strategic planning authorities to use this approach to achieve additional benefits whilst addressing climate change related flood risks

24. As owner of riparian properties, the City Corporation is required under the Metropolis Management (Thames River Prevention of Floods) Amendment Act 1879 to carry out flood works, maintaining the flood defences that they own. If adopted this strategy will apply to all properties on the City's riverside. For City owned riparian properties elsewhere the TE2100 Plan will apply, along with any local measures required through the relevant local authority.
25. **Financial implications** – none
26. **Resource implications** – The external consultation will be managed by the Environmental Resilience Team in DBE as part of their program of work.
27. **Legal implications** - None
28. **Risk implications** - This strategy has been developed in response to Corporate and Departmental risks relating to climate change and flood risk. The strategy seeks to provide both appropriate flood defences and shape an outstanding riverside space. Without appropriate flood defences, there is a risk of damage to property and infrastructure and potential loss of life through catastrophic flooding. If opportunities are missed to shape an outstanding riverside space, the experiences of riverside users will be greatly diminished with an impact on the City's reputation. This could also represent a failure to realise the full potential of the City's riverside as a strategically important asset. There remains substantial uncertainty with regards to the speed and impact of sea level rise and the implementation, funding and future legislative requirements of the Thames Estuary 2100 Plan. This strategy has been developed fully acknowledging this uncertainty (and also the adaptive approach of the wider plan) and has been written to enable future flexibility while still allowing practical interventions now.
29. Failure to progress this strategy would risk non compliance with the City Corporation's statutory duties as LLFA and the commitments made in the Climate Action Strategy.
30. **Equalities implications** – A Test of relevance was carried out on the Strategy, please see Appendix B
31. **Climate implications** – This strategy forms part of the Climate Resilience strand of the Climate Action Strategy.
32. **Security implications** – none

Conclusion

The Environmental Resilience team in DBE has been developing a riverside strategy as one of the measures from the Local Flood Risk Management Strategy (LFRMS) 2021-27 as approved by P&T earlier this year.

This City Riverside Strategy provides a roadmap to guide the City of London Corporation as Local Authority and Lead Local Flood Authority (LLFA) for the Square Mile. The options set out in this strategy will be reviewed at least every 10 years in the light of new evidence and may change in the future. Our aim is to ensure that the City remains at low risk of flooding throughout this century and beyond, taking account of the predicted changes in sea level rise as a result of climate change.

This report is seeking approval to put the City of London's Riverside Strategy out to public consultation to obtain the views of external stakeholders and users of the riverside. Once the public consultation is complete and comments considered, the Riverside Strategy will be brought back to this Committee for adoption.

Appendices

- Appendix A – draft Riverside Strategy for Public Consultation
 - Appendix 1 Where are we now – the evidence base
 - Appendix 2 Illustrative defence raising options
- Appendix B – Equalities Assessment Test of Relevance

Background Papers

Planning and Transportation Committee 16th February 2021. Agenda item 6 - Local Flood Risk Management Strategy 2021-27

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