

<b>Sustainable Development Select Committee</b>		
<b>Report Title</b>	<b>Flood and River Related Consultation – Preliminary Results</b>	
<b>Ward</b>	All wards	Item No. 4
<b>Contributors</b>	Director of Regeneration & Asset Management Head of Planning	
<b>Class</b>	Part 1	Date: 11 May 2015

### **Reason for lateness**

This report is intended to highlight the results of consultation (with the public and with statutory consultees) on the Council's draft Local Flood Risk Management Strategy and River Corridors Improvement Plan Supplementary Planning Document. The consultations closed on 30<sup>th</sup> April (day of dispatch for reports) and there have been a number of responses from statutory consultees received on 29<sup>th</sup> and 30<sup>th</sup> April which needed to be reviewed by the report authors and reflected in the report if appropriate.

### **1. Summary**

- 1.1 This report provides information to the Sustainable Development Select Committee about the preliminary results of public consultation on the Council's draft Local Flood Risk Management Strategy and the River Corridors Improvement Plan Supplementary Planning Document.
- 1.2 The report provides a background and context to the Council's statutory obligations under the Flood and Water Management Act 2010 - as a Lead Local Flood Authority - to develop, maintain, apply and monitor a strategy for local flood risk management in its area.
- 1.3 It also provides the context for the River Corridors Improvement Plan as one of the documents that, when adopted, will support the Council's Local Development Framework and set out guidance to inform decisions on planning applications where development near a river or river corridor is proposed.
- 1.4 Appendix A to the report sets out the consultation and communications plan used to support the joint consultation process. Appendices B & C outline the preliminary results of the consultation for each of these documents.

## 2. Policy context

- 2.1 *Shaping our future*, Lewisham's Sustainable Community Strategy for 2008-2020, sets out a vision for Lewisham;-  
'Together, we will make Lewisham the best place in London to live, work and learn.'

*Shaping our future* includes the priority outcomes:-

**Empowered and responsible** – where people can be actively involved in their local area and contribute to supportive communities.

- 2.2 In addition, the Council has ten corporate priorities which support delivery of the Sustainable Community Strategy. The alleviation of flood risk for residents and businesses, together with the multi-agency work to prepare for, and cope with extreme weather events contributes to the achievement of three of the Council's corporate priorities:-

- **Community leadership and empowerment** – develop opportunities for the active participation and engagement of people in the life of the community.
- **Clean, green and liveable** – environmental management, cleanliness and care for roads, pavements and a sustainable environment.
- **Inspiring efficiency, effectiveness and equity** – ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community.

- 2.3 Lewisham's local flood risk management objectives have been developed to align with the Council's wider strategic priorities along with the Core Strategy objectives and recently updated Strategic Flood Risk Assessment. They are set out below.  
Locally we will:

- **avoid** inappropriate development and **promote** new-development and re-development that **contributes** to a reduction in flood risk elsewhere and creates environmental benefit (e.g. sustainable urban drainage systems, reduced CO2, increased biodiversity)
- work with partners to **ensure** local flood defences are maintained
- **require** river restoration, appropriate flood defence and mitigation as part of development proposals, where appropriate
- **encourage** flood risk management activities so owners of watercourses (riparian owners) and flood defence structures take action to reduce the risk to themselves, their property, and others

- continue to **improve** our understanding of flood risk and flood incidents by recording and monitoring flooding incidents to inform future work programmes
- **provide** open, transparent governance of flood risk management
- **engage** with and support local communities to value and care for the green infrastructure used to manage flood risk
- **deliver** outcomes that make best use of public resources and available sources of funding.

2.4 The role of the River Corridors Improvement Plan is to explain and elaborate on the policies in Lewisham's Core Strategy (part of the LDF) in relation to development near rivers.

2.5 In addition to implementing planning policy, the SPD will assist and aid the implementation of other documents in the Council Planning Policy Framework.

2.6 In particular the SPD, will contribute to the implementation of the following Council priorities;-

- community leadership and empowerment – developing opportunities for the active participation and engagement of people in the life of the community
- young people's achievement and involvement – raising educational attainment and improving facilities for young people through partnership working
- clean, green and liveable – improving environmental management, the cleanliness and care for roads and pavements and promoting a sustainable environment
- safety, security and a visible presence – partnership working with the police and others and the Council's powers to combat anti-social behaviour
- strengthening the local economy – gaining resources to regenerate key localities, strengthen employment skills and promote public transport
- decent homes for all – investment in social and affordable housing to achieve the Decent Homes Standards, tackle homelessness and supply key worker housing
- active, healthy citizens – leisure, sporting, learning and creative activities for everyone
- inspiring efficiency, effectiveness and equity – ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community.

2.7 The aims of the RCIP are to:

- Provide guidance for developers and landowners;
- Ensure high quality development along the river corridors;
- Ensure development enhances the river setting;

- Provide guidance on flood alleviation and ecological improvements;
- Ensure that development is appropriate and that the impacts of development are effectively understood;
- Engage local communities in flood prone areas and encourage appropriate action;
- Encourage development which positively responds to rivers and their setting, ensuring that any necessary mitigation is designed in from the earliest stage as an inherent part of the scheme;
- Improve the overall water quality and river health.

## 2.8 The objectives of the RCIP are set out below:

- To protect and enhance the biodiversity and landscape value of the rivers in Lewisham;
- To provide coordinated guidance for development adjacent to the London Borough of Lewisham's rivers, promoting regeneration and ensuring design is responsive to and makes the most of opportunities to enhance the river environment;
- To promote the sustainable and efficient use of space by protecting and enhancing the multifunctional nature of the Ravensbourne, Quaggy and Pool Rivers, Deptford Creek and the River Thames;
- To promote opportunities to manage flooding;
- To safeguard and increase the role of the river corridors in the public realm, contributing to the open space network in the Borough, and to promote opportunities for sport, leisure, education, investment and employment;
- To promote social inclusion and tackle deprivation and discrimination, ensuring that the river corridor is accessible to everyone as part of the blueribbon network;
- To promote opportunities for walking and cycling by ensuring existing routes, such as the Waterlink Way and Route 21, are maintained and where possible enhanced, and by promoting opportunities to overcome barriers to the public rights of way network.
- To promote improved access to rivers and increased public awareness.

## 3. **Background - Local Flood Risk Management Strategy**

- 3.1 Following the severe floods of 2007, the Government commissioned Sir Michael Pitt to undertake a review of all the issues and actions associated with this extreme weather event. His report in December 2008 produced 92 recommendations, 15 of which the Government acted on immediately.
- 3.2 Sir Michael Pitt's review stated that "the role of local authorities should be enhanced so that they take on responsibility for leading the co-ordination of flood risk management in their areas". The Department for Environment, Food and Rural Affairs (Defra) followed up on the report

and the first draft of the Flood and Water Bill was produced. This was widely consulted on and many issues were raised about how the proposals could be financed. Part of the concept of the Bill was that lead local flood authorities (LLFAs) would be set up to co-ordinate all local flood related activities.

- 3.3 Part of the Flood and Water Management Act 2010 (the Act) commenced on 1 October 2010, following its Royal Assent in April 2010.
- 3.4 The Act defines the Lead Local Flood Authority for an area as the unitary authority or the county council. This is to avoid any delay or confusion about who is responsible, but in no way prevents partnership arrangements to make full use of all capabilities and experience locally. The Act enables lead local authorities to delegate flood or coastal erosion functions to another risk management authority by agreement.

#### **4. Local partnerships**

- 4.1 The Pitt Review recommended that the lead local flood authority should bring together all relevant bodies to help manage local flood risk. The important roles played by district councils, internal drainage boards, highway's authorities and water companies are also recognised in the Act and these bodies, together with the Environment Agency, are identified as risk management authorities.
- 4.2 The Act enables effective partnerships to be formed between the lead local flood authority and the other relevant authorities who retain their existing powers (with some enhancement), but it does not say what any local arrangements should look like. It requires the relevant authorities to co-operate with each other in exercising functions under the Act and they can delegate to each other. It also empowers a lead local flood authority or the Environment Agency to require information from others.
- 4.3 As an LLFA, it is Lewisham's role to forge effective partnerships with adjacent LLFAs and the Environment Agency as well as other key stakeholders – Thames Water, Network Rail and Transport for London.
- 4.4 The London Borough of Lewisham is working as part of the South East London Flood Risk Management Group (SELFRMG) to manage local flood risk and fulfil our duties and responsibilities under the Flood Risk Regulations 2009 (FRRs) and the Flood and Water Management Act 2010.
- 4.5 The South East London Flood Risk Management Group (SELFRMG) is made up of the four south east London boroughs:
  - London Borough of Bexley
  - London Borough of Bromley
  - Royal Borough of Greenwich

- London Borough of Lewisham

4.6 The SELFRMG was formed as part of the Greater London Authority Drain London Programme in 2010 to work together to produce Surface Water Management Plans (SWMP) and Preliminary Flood Risk Assessments (PFRA), the latter was a requirement of the Act. It was agreed that the Group be formalised and membership extended to other risk management authorities to form the South East London Partnership (SELP). The SELP meets every quarter and is made up of the following:

- SELP representative of the Thames Regional Flood & Coastal Committee
- SELP representative of the Southern Regional Flood & Coastal Committee
- Lead councillors from each borough
- Council officers from each borough
- Environment Agency
- Thames Water

## **5. The requirement to develop a local strategy**

5.1 The Environment Agency has developed and published a national strategy for the management of coastal erosion and all sources of flood risk for England. The National Strategy was consulted on publicly, approved by the Secretary of State and laid before Parliament prior to its publication (July 2011).

5.2 The Act also requires a lead local flood authority to develop, maintain, apply and monitor a strategy for local flood risk management in its area. The lead local flood authority will be responsible for ensuring the strategy is put in place but the local partners can agree how to develop it in the way that suits them best. The Act sets out the minimum that a local strategy must contain, and the lead local flood authority is required to consult on the strategy with risk management authorities and the public. The Local Government Association (LGA) in association with local authority representatives, the Environment Agency and Defra published a Preliminary Framework for local strategies to help local authorities develop their local flood risk management strategy in a consistent manner.

5.3 The Act requires local flood risk management strategies to be consistent with the National Strategy – in particular the guiding principles for managing flood and coastal erosion risk. The local strategies build on information such as national risk assessments and use consistent risk based approaches across different local authority areas and catchments. The local strategy will not be secondary to the national strategy; rather it will have distinct objectives to manage local flood risks important to local communities.

- 5.4 Local flood risk includes surface runoff, groundwater, and ordinary watercourses (including lakes and ponds). Local authorities need to consider the full range of measures consistent with a risk management approach in developing their local flood risk strategy. Resilience and other approaches which minimise the impact of flooding are expected to be a key aspect of the measures proposed.
- 5.5 The local Flood Risk Management Strategy must be produced in consultation with risk management authorities that may be affected by the strategy (i.e. the Environment Agency, Transport for London and Thames Water) as well as the public. The LLFA will be responsible for ensuring the strategy is put in place but local partners can agree how to develop it in a way that best suits them. The strategy must set out:
- who the risk management authorities are in the area
  - what FCRM functions may be exercised by these authorities
  - the objectives for managing local flood risk
  - the measures proposed to achieve those objectives
  - how and when the measures are expected to be implemented; the costs and benefits of those measures, and how they are to be paid for
  - the assessment of local flood risk for the purpose of the strategy
  - how and when the strategy is to be reviewed and
  - how the strategy contributes to the achievement of wider environmental objectives.
- 5.6 To manage flood risk Lewisham will:
- Work in partnership with other Risk Management Authorities (RMAs) for example, the Environment Agency, Transport for London, Thames Water and Network Rail
  - Prepare a South East London group-wide Local Flood Risk Management Strategy (LFRMS) with those authorities mentioned in paragraph 5.5
  - Prepare a specific Local Flood Risk Management Strategy for the London Borough of Lewisham with a six year action plan to be reviewed annually
- 5.7 The Local Flood Risk Management Strategy, in combination with the National Flood and Coastal Erosion Management Strategy, will encourage more effective risk management by enabling people, communities, business and the public sector to work together to:
- ensure a clear understanding of the risks of flooding and erosion, nationally and locally, so that investment in risk management can be prioritised more effectively
  - set out clear plans for risk management so that communities and businesses can make informed decisions about the management of the residual risk

- encourage innovative management of flood and coastal erosion risks, taking account of the needs of communities, businesses, and the environment
- form links between the Local Flood Risk Management Strategy and local spatial planning
- ensure that emergency plans and responses to flood incidents are effective and that communities are able to respond properly to flood warnings
- help communities to recover more quickly and effectively after incidents.

## **6. Lewisham's local flood risk management strategy**

- 6.1 The South East London Flood Risk Management Group is developing an overarching group-wide LFRMS to present the Group's common aims and objectives, their shared approach to flood risk management and their commitment to partnership working. Lewisham is also developing a borough level strategy which specifies Lewisham specific objectives and concerns with a borough specific six year action plan.
- 6.2 As well as being consistent with the Environment Agency's National Strategy, the local strategy is linked to a range of regional and local plans and studies:
- Lewisham's Core Strategy, Local Plans and Strategic Flood Risk Assessment (National Planning Policy Framework)
  - Lewisham's River Corridors Improvement Plan (Supplementary Planning Document – in development)
  - Lewisham's Preliminary Flood Risk Assessment (Flood Risk Regulations 2009)
  - Lewisham's Surface Water Management Plan (Pitt Review)
  - Multi Agency Flood Plan (Civil Contingencies Act 2004)
  - Thames River Basin Management Plan (EU Water Framework Directive 2000)
  - Thames and North Kent Rivers Catchment Flood Management Plans (Catchment Framework Management Plans Guidance)
  - River Ravensbourne Catchment Improvement Plan (in development)
- 6.3 The local strategy will form the framework within which communities should have a greater say in local risk management decisions, and are supported in becoming better informed about flood risk issues generally.
- 6.4 A range of internal stakeholders have been involved in the development of the local strategy including officers from Planning; Emergency Planning; Regeneration Programme Management; Asset Management; Highways; Sustainable Resources; Parks & Open Spaces and Ecological Regeneration.



## **7. Background – River Corridors Improvement Plan**

- 7.1 The Core Strategy is the principal planning policy document in the Lewisham Local Development Framework (LDF) and it sets out the vision, strategic objectives, strategy and policies to guide public and private sector investment to manage development and regeneration in the borough through to 2026.
- 7.2 The RCIP SPD, when adopted, will form part of the LDF and will facilitate the implementation of the vision, objectives and policies of the Core Strategy. As an SPD, the document will be used to explain and elaborate on the implementation of policy in the rest of Lewisham's LDF and the content must be consistent with the policies in the Development Plan, including those in the Core Strategy and London Plan.
- 7.3 The starting point for the RCIP SPD is the existing Ravensbourne River Corridor Improvement Plan (September 2010) which focused on a specific area of the Ravensbourne River. The draft RCIP SPD has been prepared as part of the Council's European River Corridor Improvement Plan project and builds on the content of the existing document by updating and expanding on the content to cover all rivers in the borough.

## **8. Lewisham River Corridor Improvement Plan SPD summary**

- 8.1 The RCIP SPD will provide detailed guidance to positively influence development near rivers, and to ensure that the development positively responds to the rivers and their setting. The RCIP SPD will provide co-ordinated guidance for development and seeks to ensure that development is of high quality and enhances the river setting.
- 8.2 The first section of the RCIP SPD provides an introduction to the document, including the aims and objectives. The second section sets out the vision, which, as an overarching statement is:
- “A coordinated approach to bring the River Thames, Deptford Creek, the River Ravensbourne, the River Quaggy, Pool River and Kyd Brook back to the heart of Lewisham, as distinctive and attractive focal points that bring together local communities and wildlife, promoting healthy living whilst reducing flood risk and the impacts of climate change.”
- 8.3 The third section looks at the policy and strategic context.
- 8.4 Section 4 breaks Lewisham's rivers down into three different 'character areas' each of which are described in terms of the corridor itself, key landscape and townscape characteristics, the river ecology, flood risk, heritage and conservation areas. The three character areas are:
- River Thames and Deptford Creek

- River Ravensbourne and River Pool
- River Quaggy and Kyd Brook

- 8.5 Section 5 looks at access arrangements, both in terms of existing access to the rivers, as well as potential enhancements.
- 8.6 Section 6 contains the design and development guidelines which should be referred to for any development or redevelopment. Developers, landowners, applicants and the Council should have regard to these guidelines when considering development near a river.
- 8.7 Section 7 looks at the different delivery mechanisms, and section 8 sets out an action plan for river related works.

## **9. The consultation process**

- 9.1 It is a statutory requirement that the LLFA develop the local strategy in consultation with flood risk management authorities and the public and from a practical standpoint there are substantial benefits in ensuring local communities acquire a better understanding of local risk management, co-ordinated planning and sustainability. It will also emphasise the need to balance national and local activities and funding.
- 9.2 The consultation process for Local Development Framework documents such as this SPD is set out in the Statement of Community Involvement. It is a legal requirement to undertake the consultation stated in the SCI.
- 9.3 A full consultation and communications plan with a range of actions was developed to support the six week consultation. This can be seen at Appendix A.
- 9.4 Access to both the Local Flood Risk Management Strategy and River Corridors Improvement Plan consultations was primarily online through Lewisham's Consultation Portal signposted via news items on the 'Get involved', Planning and Environment sections of the website and supported by a mix of direct mail, social media and the availability of questionnaires in libraries. A mix of direct mail and social media was used to raise awareness of both consultations for relevant groups/stakeholders.

## **10. Financial implications**

- 10.1 There are no specific financial implications arising from this report. A budget of £118k for flood management is currently held within the Regeneration & Asset Management Division. Any necessary expenditure arising as a result of implementing the strategy, once

finalised, will be contained within this sum or otherwise subject to the approval of the Executive Director for Resources and Regeneration or Mayor and Cabinet.

## **11. Legal implications**

- 11.1 The Council is a Lead Local Flood Authority and Risk Management Authority under the Flood and Water Management Act 2010, 'the Act'. As a lead Local Flood Authority (LLFA) it must develop, maintain, apply and monitor a strategy for local flood risk management in its area called a local flood risk management strategy (LFRMS). The strategy must specify:
- the risk managements authorities in the area
  - the objectives for managing local fold risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Management Plan, prepared in accordance with the Flood Risk Regulations 2009).
  - the measures proposed to achieve those objectives
  - how and when the measures are expected to be implemented
  - the costs and benefits of those measures, and how they are to be paid for
  - the assessment of local flood risk for the purpose of the strategy
  - how and when the strategy is to be reviewed, and
  - how the strategy contributes to the achievement of wider environmental objectives
- 11.2 This strategy must be in compliance with National Flood and Coastal Erosion Management Strategy published by the Environmental Agency. The LLFA must consult on its LFRMS with the risk management authorities that may be affected by the strategy and the public. (section 9 (9) of the Act). A risk management authority in this context is the Environment Agency, a lead local flood Authority, internal drainage authority, a water company and highways authority.
- 11.3 The procedures which the Council is required to follow when producing a Supplementary Planning Document derive from the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 11.4 The function of approving Planning Documents is shared by the Mayor and Cabinet and Full Council, however the formal adoption of the document is a matter reserved to Full Council only.
- 11.5 If Full Council resolves to adopt the SPD, the document will form part of the Local Development Framework.

- 11.6 The Equality Act 2010 introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 11.7 In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act.
  - advance equality of opportunity between people who share a protected characteristic and those who do not.
  - foster good relations between people who share a protected characteristic and those who do not.
- 11.8 The duty continues to be a ‘have regard duty’, and the weight to be attached to it is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 11.9 The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at: <http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance/>
- 11.10 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
1. The essential guide to the public sector equality duty
  2. Meeting the equality duty in policy and decision-making
  3. Engagement and the equality duty
  4. Equality objectives and the equality duty
  5. Equality information and the equality duty

- 11.11 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:  
<http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

## 12. Crime and disorder implications

- 12.1 The RCIP does not provide details of how individual developments are to come forward however planning applications for development on individual sites are required and will need to demonstrate how proposals meet the crime and safety objectives and policies of the London Plan and Lewisham's adopted Core Strategy. This will help ensure that new development does not give rise to crime, fear of crime or public disorder and to ensure that the borough is a safe, attractive and inclusive.

## 13. Equalities implications

- 13.1 The Equality Act 2010 became law in October 2010. This Act aims to streamline all previous anti-discrimination laws within a Single Act. The new public sector Equality Duty, which is part of the Equality Act 2010, came into effect on the 5 April 2011.
- 13.2 *Shaping our future*, Lewisham's Sustainable Community Strategy for 2008- 2020, sets out a vision for Lewisham;-

***“Together we will make Lewisham the best place in London to live work and learn.”***

This is underpinned by hard-edged principles for:

**reducing inequality** – narrowing the gap in outcomes for citizens

**delivering together efficiently, effectively and equitably** - ensuring that all citizens have appropriate access to and choice of high quality local services

- 13.3 Lewisham's Comprehensive Equalities Scheme (CES) 2012-16 describes the Council's commitment to equality for citizens, service users and employees. The CES is underpinned by a set of high level strategic objectives which incorporate the requirements of the Equality Act 2010 and the Public Sector Equality Duty.

The Council equality objectives through the CES include:

**To improve access to services**

Take reasonable steps to ensure that services are inclusive; responsive to risk; physically accessible and provided through the most efficient and effective channels available.

**To increase understanding and mutual respect between communities**

Take reasonable steps to build stronger communities and promote good relations - both within and between communities.

**To increase participation and engagement**

Take reasonable steps to remove barriers that may exist to engagement and help residents (especially those who are under-represented) to participate in local decision making and influence local decisions.

- 13.4 The Local Flood Risk Management Strategy includes as an appendix, a research study on 'Social Vulnerability to the impacts of Climate Change' in Lewisham.
- 13.5 A full equalities analysis assessment (EAA) will be undertaken to inform the final version of the strategy and will take into account the results of stakeholder and public consultation.
- 13.6 New development within the borough will be subject to the provisions set out in the SPD and it will improve the general accessibility of the public realm and riverside environments.
- 13.7 It is not necessary to undertake an EAA of the SPD. The Core Strategy has been subject to an EAA and the SPD is guidance that will assist in the implementation of the already assessed Core Strategy.

**14. Environmental implications**

- 14.1 Reducing, mitigating and effectively managing flood risk in the Borough will contribute significantly to our multi-agency approach to climate change adaptation, given projections of increased severe weather events.
- 14.2 Environmental issues are at the heart of the planning process and the key objectives of the RCIP SPD set out the importance of identifying key environmental features in order to protect and enhance the amenity of the local area, as well as securing development that helps create a more sustainable Lewisham.

14.3 Both documents have been subject to Strategic Environmental Screening processes against sustainability objectives. Both documents are also accompanied by a Strategic Environmental Assessment and these have been part of the documentation subject to public and statutory stakeholder consultation.

**For further information about this report, please contact;-**

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## Appendix A



### **Rivers and flood alleviation related engagement – spring 2015 Consultation and communications plan**

#### **Situational analysis**

Lewisham's rivers are a source of enjoyment for large numbers of our residents. In recent years, the Council has been working with a number of partners including the European Union, the Environment Agency, the Greater London Authority and private developers to 're-naturalise' sections of both the Ravensbourne and the Quaggy to help make the most of these important natural resources. This has been at the heart of a number of award-winning public realm improvement schemes, for instance at Cornmill Gardens and Ladywell Fields.

However, urban areas like Lewisham will always be susceptible to flooding, and so the Council has to be careful to balance improvement schemes with its responsibilities as a Lead Local Flood Authority (LLFA) under the Flood Risk Regulations 2009 and the Flood and Water Management Act 2010. In schemes like those mentioned above, this has been made possible by the implementation of subtle water storage solutions which will enable the rivers to safely flood nearby open spaces.

As a LLFA, Lewisham is part of the South East London Flood Risk Management Group along with Bexley, Bromley and Greenwich. The Group have adopted a partnership approach and developed an overarching **Local Flood Risk Management Strategy (LFRMS)** for the partnership area and four borough specific strategies along with a statutory strategic environmental assessment. There is an statutory obligation to consult a range of strategic stakeholders and risk management authorities e.g. Thames Water, TfL, Network Rail, neighbouring boroughs not part of the Group; the Environment Agency, Natural England etc. as well as local residents, amenity groups, businesses, developers and environmental/conservation groups.

Under the Flood Risk Regulations 2009 **Flood Risk Management Plans** have to be produced and published by December 2015 for the whole of England and Wales. FRMPs identify the risk from flooding and set out objectives and measures for managing that risk. In so doing, they aggregate information about all sources of flooding - and coastal erosion where appropriate - to better inform prioritisation, decision making and work programming. These plans will shape important decisions, direct considerable investment and action, and deliver significant benefits to communities and the environment. In England, the Environment Agency leads on flooding from rivers, the sea and reservoirs, again working with partners in cross-border catchments. Lead Local Flood Authorities (LLFAs) lead on local flood risk



(surface water, ground water and non-main rivers). Responses from the consultation on Lewisham's draft local flood risk management strategy will also inform the Flood Risk Management Plan for London.

The **River Corridors Improvement Plan Supplementary Planning Document (RCIP)** will provide detailed planning policy guidance for all rivers and river corridors in the borough and is being prepared in partnership with the Environment Agency. Its purpose is to ensure that all works along the river corridors are of a high quality and guided by the protection and enhancement of local amenity. It seeks to strike a balance between the interests of environmental protection and enhancement, flood risk, housing supply and economic growth. It builds on the existing Ravensbourne Corridor Improvement Plan which looks at one section of the Ravensbourne River, from Catford to the River Thames at Deptford, and identifies how development and local initiatives can enhance its quality.

### **Objectives**

This consultation process, supported by a communications plan aims to:

- Raise awareness of Lewisham's role and responsibilities as a Lead Local Flood Authority and the roles and responsibilities of partner organisations who are risk management authorities
- Raise awareness of the extent and type of flood risks across Lewisham
- Seek the views of local residents, businesses, communities of interest and key stakeholders on our partnership objectives and local objectives for managing flood risk
- Seek views on the measures proposed to achieve those objectives, when those measures would be implemented and their costs and benefits
- Provide an opportunity for comment on the actions proposed by the Council to help manage local flood risk through its draft six-year action plan
- Seek views on additional or alternative actions for consideration.

### **Strategy**

Access to both the Local Flood Risk Management Strategy and River Corridors Improvement Plan consultations will primarily be online through Lewisham's Consultation Portal signposted via news items on the 'Get involved', Planning and Environment sections of the website and supported by a mix of direct mail, social media and the availability of questionnaires in libraries. It is proposed to raise awareness of both consultations to relevant groups/stakeholders using direct mail and social media.

### **Tactics/channels/actions**

The target audiences for these consultations can be divided into two tiers, the second being mainly other risk management authorities and stakeholders whose statutory responsibilities may be impacted by the LFRMS or RCIP:

### *Tier one*

- Lewisham residents; young people, families and parents, older people, carers, people with a physical disability, people with a sensory disability, people with a learning disability
- The business community, architects, planning consultants, property developers, private homebuilders, riparian owners
- Lewisham staff, councillors, emergency planning, public health
- Local assemblies, Local amenity groups, Young Advisors, Positive Ageing Council, voluntary & community sector, environmental/conservation groups
- Public sector partners
- Schools.

### *Tier two*

- Environment Agency (south east region), Thames Water Utilities Ltd, Transport for London, Greater London Authority (GLA), Network Rail
- London boroughs of Bexley, Bromley & RB Greenwich as highways authorities, LB Southwark
- London Fire Brigade and other emergency responders
- Regional Flood and Coastal Committee.

A range of actions will support both consultation processes:

- A news item and signposts on the Council's website (across three key pages 'Get involved', Planning and Environment) with a link to the questionnaire via Lewisham's Consultation Portal
- Brief news items with a link to the consultation within the Lewisham Life eNewsletter and any other relevant eNewsletters issued by the Council for the duration of the consultation
- A 'News for You' item and link to the consultation aimed at Lewisham staff
- A direct email to raise awareness with a link to the consultation for councillors
- Awareness of the consultation targeted at
  - Local Assemblies participants
  - Young Advisors
  - Members of the Positive Ageing Council
- Targeted use of external networks to raise awareness and link to the consultation via email and/or social media
  - Voluntary Action Lewisham
  - 'Greenscene' Twitter account
  - Ravensbourne Catchment Improvement Group [which includes Thames 21 and the Quaggy Waterways Action Group (QUAG)]
  - South East London Flood Risk Management Group
- Direct mail to individuals/organisations who have in the past expressed an interest in Lewisham's environment and in particular its rivers and who are not currently on the Planning Policy mailing list
- Notification of the consultation to schools which have expressed an interest in the subject

- Copies of the documents and paper-based questionnaires can also be available in libraries

### **Controls/evaluation**

The consultations are scheduled to run for six weeks and an analysis of the consultation responses will begin three weeks after the consultations open with the emerging data available. Respondents will be asked to indicate how they were made aware of the consultation along with their postcode (both optional) to understand the geographical spread of responses.

In terms of monitoring, respondents to the LFRMS will be asked to indicate that are responding as;-

- a resident of the borough
- business located in the borough
- work/study/spend time in the borough
- a land owner
- a representative of a community group/voluntary or other organisation

They will also be asked;-

- how long they have lived in the borough
- if they own or rent their accommodation (own outright; owns with mortgage or loan; part owns and part rents – shared ownership; rents)
- if you rent who is your landlord (council, housing association, housing cooperative, charitable trust social housing provider, private landlord or letting agency)
- the age group they belong to
- their gender
- if they consider they have a disability
- their ethnicity (white British background; other White background; Black and minority ethnic background; prefer not to say)
- Occupation (full time employee; part time employee; self-employed; unemployed; retired; full time carer; full time student)

### **Lewisham Local Flood Risk Management Strategy (LFRMS) – Introduction to consultation and consultation questions**

Lewisham Council is a Lead Local Flood Authority under the Flood Risk Regulations 2009 and the Flood and Water Management Act 2010. This means the Council has a specific role and a set of responsibilities, duties and powers to help them manage flood risk from localised sources across the borough. Lewisham's Local Flood Risk Management Strategy (the Strategy) sets out how the Council along with other agencies and organisations like Thames Water and the Environment Agency (known as risk management authorities) will monitor and respond to sources of local flood risk now and into the future. It has been developed to ensure that flood risks are managed in a co-ordinated way to balance the needs of communities, the local economy and the environment.

We would like to hear the views of residents, people who work or spend time in the borough businesses and community groups on the Strategy. Your responses will help shape the final document. Your responses will also inform the Flood Risk Management Plan for London which is being developed by the Environment Agency.

In addition to the Strategy, the following documents are provided for consultation:

- Local Flood Risk Management Strategy – Non Technical Summary
- Action Plan
- Strategic Environmental Assessment
- Flood Risk Maps x 8

Lewisham's local flood risk management objectives have been developed to fit with the Council's wider strategic priorities for the borough. Locally we will:

- **avoid** inappropriate development and **promote** new-development and redevelopment that **contributes** to a reduction in flood risk elsewhere and creates environmental benefit (e.g. sustainable urban drainage systems, reduced CO2, increased biodiversity)
- work with partners to **ensure** local flood defences are maintained
- **require** river restoration, appropriate flood defence and mitigation as part of development proposals, where appropriate
- **encourage** flood risk management activities so owners of watercourses (riparian owners) and flood defence structures take action to reduce the risk to themselves, their property, and others
- continue to **improve** our understanding of flood risk and flood incidents by recording and monitoring flooding incidents to inform future work programmes
- **provide** open, transparent governance of flood risk management
- **engage** with and support local communities to value and care for the green infrastructure used to manage flood risk
- **deliver** outcomes that make best use of public resources and available sources of funding.

The Strategy sets out a range of information:

- Definition of the Council's roles and responsibilities as a lead local flood authority
- An explanation of the other risk management authorities responsible for managing flood risk from various sources
- Details of the potential sources of flood risk for the borough and identification of areas at a relatively higher risk of flooding
- The approach to managing flood risk including an action plan

Q1. Is it clear what the responsibilities of the Council are in relation to flood risk management?

- Q2. Are the roles and responsibilities of the other risk management authorities clearly set out in the strategy?
- Q3. Are the local flood risk objectives clear, comprehensive and appropriate in seeking to protect the interests of local communities?
- Q4. Do the Strategy and Flood Risk Maps give you a clear idea of the potential type and extent of flood risk across Lewisham?
- Q5. Is it clear what actions are being considered by the Council to manage local flood risk over the next six years?
- Q6. Does the Strategy provide a clear direction on how the Council and its partners intend to manage local flood risk in the future?

Do you have any other comments on the LFRMS?

### **River Corridors Improvement Plan Supplementary Planning Document (RCIP) – Introduction to consultation and consultation questions**

The River Corridors Improvement Plan Supplementary Planning Document (RCIP) will provide detailed planning policy guidance for all rivers and river corridors in the borough. It is being developed in partnership with the Environment Agency. Its purpose is to ensure that all works along the river corridors are of a high quality and guided by principles designed to protect and enhance the local amenity. It seeks to strike a balance between the interests of environmental protection and enhancement, flood risk, housing supply and economic growth. It builds on the existing Ravensbourne Corridor Improvement Plan which looks at one section of the Ravensbourne River, from Catford to the River Thames at Deptford, and identifies how development and local initiatives can enhance its quality.

We would like to hear the views of residents, people who work or spend time in the borough, community and amenity groups, local businesses, developers, architects and planning consultants. Your responses will help shape the final document.

#### **General**

1. Are the aims and objectives of the RCIP clear?  
YES                      NO

1.1 If not, please indicate what you think is missing.

2. Do you think the design and development guidelines (section 6) give a clear message to developers, landowners, community groups, the Council and other interested parties about how development near river corridors should take place.  
YES NO

### **Borough-wide policies**

3. Policy 1: Do you agree with the joined up approach to development and the aspiration of bringing rivers back to the heart of Lewisham's developments and open spaces, as set out in this policy?  
YES NO

3.1 Can you think of any other benefits that an 'integrated approach' would bring?

4. Policy 2: Do you agree that Full river restoration should be the starting point for discussions about river improvements, followed by a 'sliding scale' to Partial restoration and In-channel enhancements?  
YES NO

5. Policy 3: Do you agree with the aspiration for all new development to improve both visual and physical access to and along the river?  
YES NO

6. Policy 4: Do you agree that all new development should treat the river as a key part of the site, the place and any public spaces?  
YES NO

7. Policy 5: Do you agree that all new development should protect and improve local biodiversity?  
YES NO

7.1 Do you agree with the measures set out at parts a-h of the draft policy?

YES NO

8. Policy 6: Do you agree with the approach taken to managing flood risk?  
YES NO

9. Policy 7: Do you agree with the approach taken to managing and maintaining areas near rivers?  
YES NO

### **Corridor specific policies**

10. Policy 8: Do you agree with the approach taken to managing new development in the Thames River and Deptford Creek area?

YES NO

11. Policy 9: Do you agree with the approach taken to managing new development in the Ravensbourne, Pool, Quaggy and Kyd Brook areas?

YES NO

**Other**

Do you have any other comments on the RCIP?