



Blackpool Council



Consultation on the Lancashire Local Flood Risk Management Strategy 2021–2027

Introduction

The Flood and Water Management Act 2010 designated Blackburn-with-Darwen Council, Blackpool Council and Lancashire County Council as Lead Local Flood Authorities (LLFAs). The councils have a range of powers, duties and responsibilities and manage flood risk from 'local' sources. These local sources of flooding are surface water, groundwater and ordinary watercourses. The councils want your views on our joint draft Lancashire Local Flood Risk Management Strategy.

Under Section 9 of the Flood and Water Management Act 2010, Lead Local Flood Authorities must produce a Local Flood Risk Management Strategy which is consistent with the [National Flood and Coastal Erosion Risk Management Strategy](#) and we must publicly consult on our Draft Strategy.

The aim is to better protect and improve flood resilience for the people of Lancashire. It sets out how we will concentrate our resources and efforts to improve our understanding of local flood risks, whilst delivering schemes, and supporting our businesses and communities.

The strategy and consultation are only intended to address local sources of flooding. The strategy is not concerned with managing flood risk from main rivers, coastal or sewerage sources, because these are covered by the Environment Agency's Plans and Assessments Framework and a national strategy.

About this consultation

This survey is being undertaken by Infusion Research, part of Blackpool Council's Corporate Development Unit. Data will be gathered in accordance with the Infusion privacy notice accessible from [Blackpool Council's website](#). Completing this survey is voluntary, responses will be anonymised and no personal data relating to any individual will be collected or stored. Data relating to the responses of organisations will reference the name of the organisation if relevant to the response. Analysis of the data gathered will be shared with partner organisations. The findings from the survey are for consultation purposes only, and will be used

How your views will be used

How to complete this survey

If you wish to raise any issues about the strategy which are not covered by the questions below, please email infusion@blackpool.gov.uk

☒ Yes☐ No

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Please select which best describes your organisation:

- | | | |
|--|---|--|
| <input type="checkbox"/> Government Organisation i.e. Quango | <input type="checkbox"/> Water and Sewerage Company | <input checked="" type="checkbox"/> District/Unitary Council |
| <input type="checkbox"/> Flood Action Group | <input type="checkbox"/> Rivers Trust | <input type="checkbox"/> Wildlife Trust |
| <input type="checkbox"/> Town or Parish Council | <input type="checkbox"/> Regional Flood and Coastal Committee | <input type="checkbox"/> Developer/Consultant |
| <input type="checkbox"/> Highways England | <input type="checkbox"/> Network Rail | <input type="checkbox"/> Electricity North West |
| <input type="checkbox"/> Other, please state below | | |

Please let us know which organisation you're responding on behalf of:

Which of the following best describes your role in the organisation? Please select:

- | | | |
|---|---|---|
| <input type="checkbox"/> Highway Officer/Engineer | <input checked="" type="checkbox"/> Flood Risk Officer/Engineer | <input type="checkbox"/> Coast Officer/Engineer |
| <input type="checkbox"/> Planning Professional | <input type="checkbox"/> Landscape Architect | <input type="checkbox"/> Ecologist |
| <input type="checkbox"/> Chair/Administration | <input type="checkbox"/> Other, please state below | |

Service Manager Environmental Services / Drainage engineer

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Definitions and roles

The strategy defines the local flood risk as the risk of flooding from surface water, groundwater, and ordinary watercourses. The level of risk is worked out by multiplying the likelihood of it happening with the consequences.

How clear is this explanation of 'local' sources of flooding?



Very
clear



Clear



Neither
clear
nor
unclear



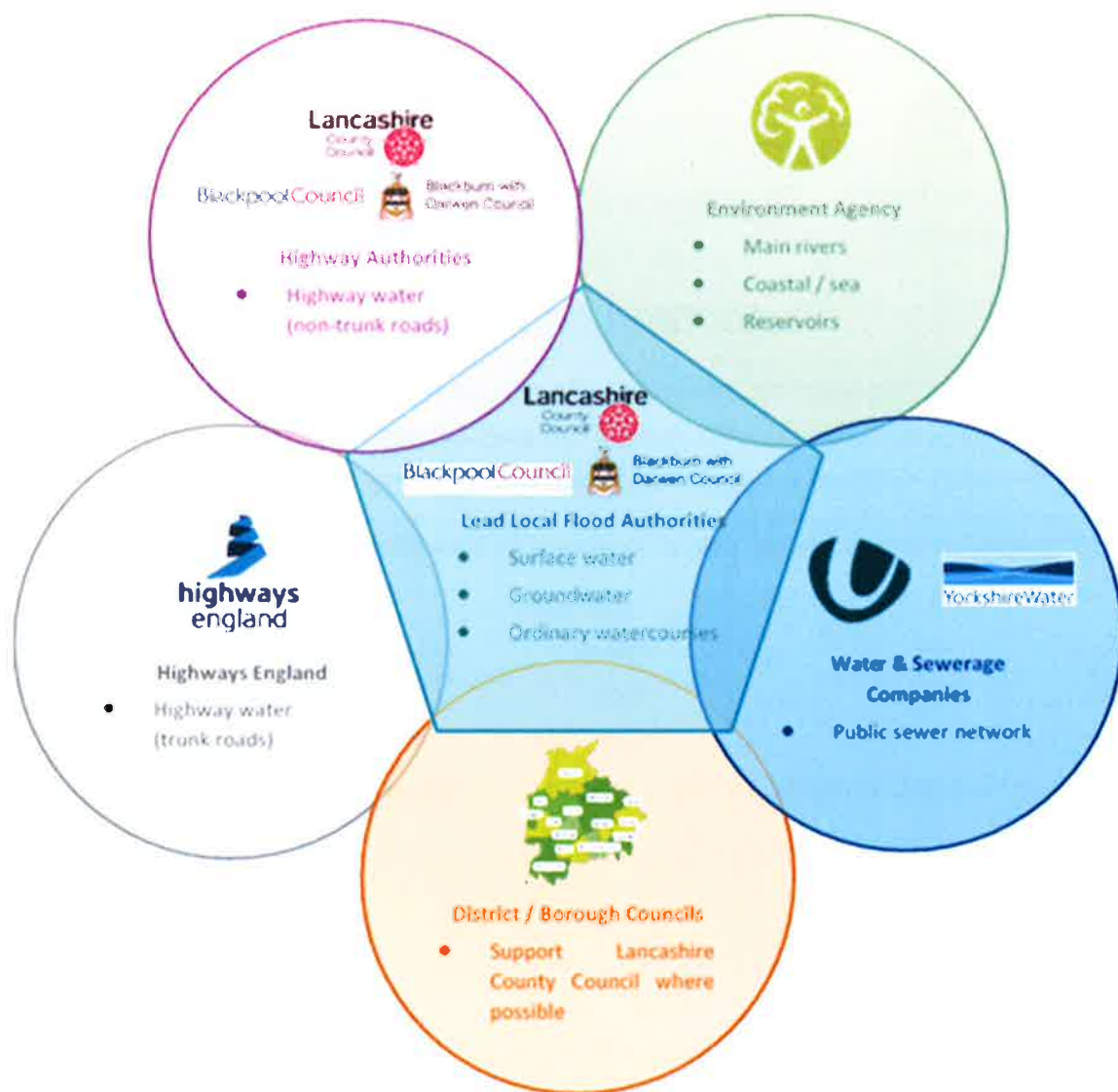
Unclear



Very
unclear

If you have answered 'unclear' or 'very unclear', what would help to make this clearer:

The strategy identifies the flood risk management authorities across Lancashire and what types of flood risks they are responsible for. The figure below summarises this:



How clear is the diagram above in explaining the role and responsibilities of the flood risk management authorities?

- ☐ Very clear
 ☒ Clear
 ☐ Neither clear nor unclear
 ☐ Unclear
 ☐ Very unclear

If you have answered 'unclear' or 'very unclear', what would help to make this clearer:

We feel the diagram does not reflect the actions of the District Council in dealing with flooding. Examples being liaison with flood groups, response at the local level, follow up investigations into flooding incidents and proactive maintenance and inspections.

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Legislative and Strategic Framework

The legislative framework sets out the roles and responsibilities flood risk management authorities have in flood and water management. The strategy describes how the following documents set the context for the strategy: the Flood Risk Regulations 2009, the Flood and Water Management Act 2010; the Town and Country Planning (Development Management Procedure) (England) Order 2015; Land Drainage Act 1991 (as amended by the FWMA 2010); Coast Protection Act 1949 (as amended by FWMA 2010); Highways Act 1980; Climate Change Act 2008; the Water Framework Directive (2000/60/EC); and the Water Industry Act 1991.

Do you agree that the strategy covers all of the legislation relevant to local flood risk management?

☒ Yes

☐ Somewhat

☐ No

☐ Don't know/not sure

If you have answered 'No' or 'Somewhat', please tell us why:

There are various national, regional and district level plans and strategies also relevant to the document. Those referenced in the strategy are: A Green Future: 25 Year Environment Plan; The Ten Point Plan for a Green Industrial Revolution; the National Planning Policy Framework; the North West Flood Risk Management Plan; the Catchment Flood Management Plans; the North West RFCC Business Plan; the Drainage and Wastewater Management Plan; Preliminary Flood Risk Assessments and Strategic Flood Risk Assessments.

Do you agree that the strategy covers all of the national, regional and local assessments and plans relevant to local flood risk management?

☐ Yes

☒ Somewhat

☐ No

☐ Don't know/not sure

If you have answered 'No' or 'Somewhat', please tell us why:

We feel that the strategy needs to acknowledge Multi Agency Flood Plans 1 and 2.

The strategy also identifies other individuals and landowners with a role and responsibilities for managing flood risks on their land. These are:

- **Business, land and property owners** – who must take measures to protect their property when there is known to be a risk
- **Riparian owners** – meaning someone who owns land next to or over a watercourse, and must ensure the water can pass freely through their land
- **Developers** – who manage flood risk on-site as part of a new development

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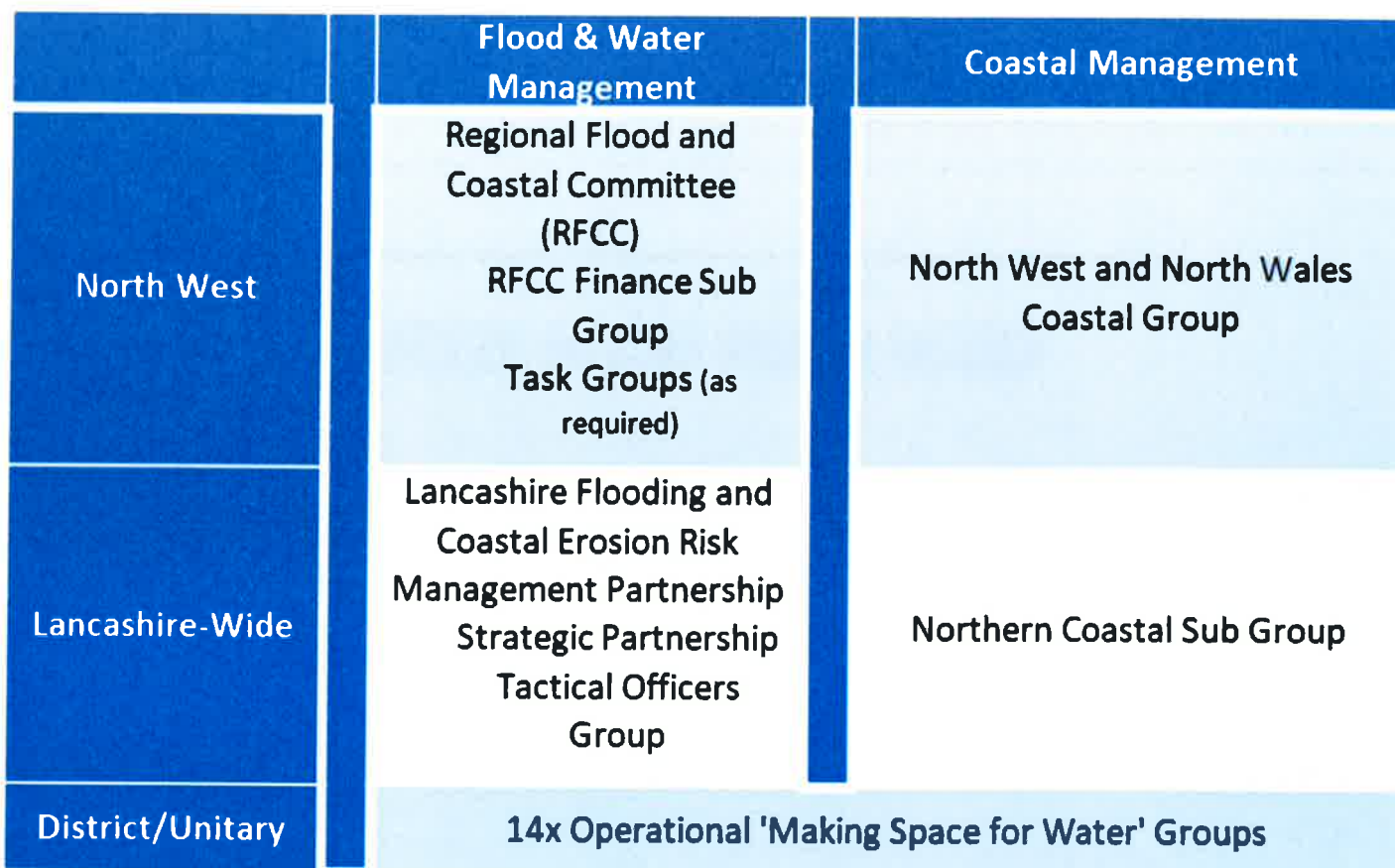
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The draft strategy sets out the governance for flood and coastal erosion risk management, which is summarised in the diagram below:



The North West Regional Flood and Coastal Committee ensures there are plans to identify, communicate and manage flood and coastal erosion risks, links to relevant bodies to develop an understanding of flood and erosion risk, and uses this to target investment.

The North West and North Wales Coastal Group examines the economic, social and environmental issues and addresses them through policy.

The Lancashire Flooding and Coastal Erosion Risk Management Partnership supports local governance, ensuring local issues and priorities are reflected at the North West Regional Flood and Coastal Committee. There is a strategic group which sets the overall direction, and a tactical group which reports to the strategic group.

How clear is this explanation of the role and responsibilities of individuals and communities?

☐ Very clear

☒ Clear

☐ Neither clear nor unclear

☐ Unclear

☐ Very unclear

If you have answered 'unclear' or 'very unclear', what would help to make this clearer:

We feel the explanation is clear however there is no reference to community responsibilities for volunteer groups such as flood wardens within the descriptions listed.

Is this explanation of the governance of flood and coastal erosion risk management clear?

☒ Yes ☐ Somewhat ☐ No ☐ Don't know/not sure

If you have answered 'No' or 'Somewhat', please tell us why:

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As Lead Local Flood Authorities we work with a number of partner flood risk management authorities as well as wider colleagues from charitable trusts to community groups. The main groups we have identified are:

- **Catchment Partnerships** – which look at practical measures to manage river catchment, and include organisations such as Environment Agency, United Utilities, Local Authorities, Landowners, Wildlife Trusts, National Farmers Union, universities and colleges, and Local Businesses
- **Flood Action Groups** – around 50 voluntary groups of local residents across the county
- **Lancashire Resilience Forum** – which pulls together those with a legal duty to respond to emergencies such as the emergency services, local authorities, the NHS, the Environment Agency, United Utilities, Maritime Coastguard Agency and others

Do you think this covers all the key wider partners we work with?

☐ Yes

☒ No

☐ Don't know/not sure

If you have answered 'No', please tell us which other partners need to be included in this section:

Catchment partnerships need to include Yorkshire Water to cover actions within the East of the County.

We would question whether Craven District Council and Calderdale needed to be included into the list of Local Authorities dealing with the risk of flooding in

Funding for flood and coastal erosion risk management (FCERM) is often facilitated through the FCERM Investment Programme, and comprises monies from:

- Flood defence Grant in Aid, from Central Government
- Local Levy, from the North West Regional Flood and Coastal Committee
- Partnership funding sources, from Councils, partners, businesses and communities

Does this cover all of the funding available for local flood risk management?

☐ Yes

☒ No

☐ Don't know/not sure

If 'No', please tell us about other possible sources of funding:

We feel that the Property Flood Resilience grant scheme could be listed as it is available to use when undertaking resilience work on properties which have previously flooded.

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Local Risks & Challenges

Which of the following local flood risks referred to in the strategy do you regard as the most important? (Please select no more than three options)

- | | | |
|---|---|---|
| <input type="checkbox"/> Increasing local flood risks as a result of climate change | <input checked="" type="checkbox"/> Inherited local flood risk from historical development | <input checked="" type="checkbox"/> Predominant surface water flood risk |
| <input type="checkbox"/> Groundwater risks in low lying areas | <input checked="" type="checkbox"/> Drainage infrastructure which is aging and at capacity in areas | <input type="checkbox"/> Many watercourses reflecting land that has been reclaimed and/or managed |
| <input type="checkbox"/> Other, please state below | | |

We feel drainage infrastructure must include maintenance such as routine cleansing of road gullies.

Which of the following challenges to effective local flood risk management referred to in the strategy do you regard as the most important? (Please select no more than three options)

- | | | |
|---|--|---|
| <input type="checkbox"/> Low uptake of flood insurance in at risk areas | <input type="checkbox"/> Public awareness of and resilience to flood and coastal risks | <input type="checkbox"/> Long-term sustainability of pumped catchments |
| <input type="checkbox"/> Poor water quality of our watercourses | <input checked="" type="checkbox"/> Regulation and maintenance of watercourses | <input type="checkbox"/> Developing and retaining flood risk professionals for Lancashire |
| <input checked="" type="checkbox"/> Other, please state below | | |

We feel Communication and co-operative working with neighbouring local flood authorities is required to create effective management of the flood risk to Lancashire

Do the options given in the two questions above reflect the local risks and challenges experienced across Lancashire?

- | | | | |
|------------------------------|--|-----------------------------|---|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> Somewhat | <input type="checkbox"/> No | <input type="checkbox"/> Don't know/not |
|------------------------------|--|-----------------------------|---|

sure

If 'No' or 'Somewhat', please explain why and tell us what more we could include:

We feel drainage infrastructure must include maintenance such as routine cleansing of road gullies.

We have previously listed that we feel communication and co-operative working with neighbouring lead local flood authorities is required to create

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Local Risks & Challenges

Which of the following local flood risks referred to in the strategy do you regard as the most important? (Please select no more than three options)

- | | | |
|---|---|---|
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| <input type="checkbox"/> Other, please state below | | |

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- | | | |
|---|--|---|
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| <input type="checkbox"/> Poor water quality of our watercourses | <input checked="" type="checkbox"/> Regulation and maintenance of watercourses | <input type="checkbox"/> Developing and retaining flood risk professionals for Lancashire |
| <input checked="" type="checkbox"/> Other, please state below | | |

We feel Communication and co-operative working with neighbouring local flood authorities is required to create effective management of the flood risk to Lancashire

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- | | | | |
|------------------------------|--|-----------------------------|---|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> Somewhat | <input type="checkbox"/> No | <input type="checkbox"/> Don't know/not |
|------------------------------|--|-----------------------------|---|

sure

If 'No' or 'Somewhat', please explain why and tell us what more we could include:

We feel drainage infrastructure must include maintenance such as routine cleansing of road gullies.

We have previously listed that we feel communication and co-operative working with neighbouring lead local flood authorities is required to create

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Opportunities

The draft strategy identifies a number of opportunities which could help Lancashire to better understand, manage and mitigate the risk of local flooding. These include:

- The new FCERM Investment Programme to 2027
- The delivery of multiple benefits from flood and coastal schemes
- Opportunities to manage local flood risks through development (Sustainable Drainage Schemes or "SuDS" - these are ways of managing surface water that take account of flooding, pollution, wildlife and plants, and amenity)
- Making the most of our water by integrating it within urban design and regeneration opportunities
- Using natural flood management techniques to contribute to catchment areas which work effectively
- Working towards a climate-resilient highway network (through smart monitoring and SuDS)
- Expanding the use of The Flood Hub as an effective support tool for communities at risk of flooding
- Influencing regional governance and national thinking
- Potential for Lancashire devolution

Which of the following do you regard as the top three opportunities to improve local flood risk management in Lancashire? Please select no more than three options:

- | | | |
|--|---|--|
| <input type="checkbox"/> More provision of flood warnings for local flood risks | <input checked="" type="checkbox"/> More resources to regulate local flood risk, including on private land | <input type="checkbox"/> Greater education, awareness and understanding of local flood risks is needed |
| <input checked="" type="checkbox"/> Funding bids for flood alleviation schemes are prioritised | <input checked="" type="checkbox"/> More effective and integrated working between flood risk management authorities to alleviate issues | <input type="checkbox"/> Property level protection measures |
| <input type="checkbox"/> Other, please state below | | |

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Our Vision

The Local Flood Risk Management Strategy must be consistent with the National Flood and Coastal Erosion Risk Management Strategy for England produced by the Environment Agency.

The National Flood and Coastal Erosion Risk Management Strategy has a vision of **'A nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100'**

Our vision is that by 2027, Lancashire will be a flood resilient place responsive to risks, challenges and opportunities supporting a sustainable future for the people of Lancashire.

Do you think our vision fits with that of the national strategy?

☒ Yes

☐ Somewhat

☐ No

☐ Don't
know/not
sure

If 'No' or 'Somewhat', please explain why and tell us what more we could do to improve our vision:

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Our Aims

The national strategy will be delivered through three key ambitions:

- **Climate resilient places:** working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change
- **Today's growth and infrastructure resilient in tomorrow's climate:** Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure.
- **A nation ready to respond and adapt to flooding and coastal change:** Ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action

The vision of our draft strategy will be delivered through six themes:

- **Delivering effective flood risk management locally** – meaning we will update our policies and procedures to comply with national practice
- **Understanding our local risks and challenges** – meaning we will learn more about the causes and effects of flooding, and improve communication with communities about the challenges we face
- **Supporting sustainable flood resilient development** – meaning that inappropriate development in areas at risk of flooding and erosion will be avoided, and that we will reduce the sources of flooding
- **Improving engagement with our flood family** – meaning that we will improve our work with partners and people at risk of flooding to improve their resilience
- **Maximising investment opportunities to better protect our businesses and communities** – we will build and maintain new measures to reduce flooding where we can afford to do so
- **Contributing towards a climate resilient Lancashire** – we will help our partners to detect and forecast issues faster, and work with others to help communities recover from flooding more quickly

Do you think our themes fit with the ambitions of the national strategy?

☒ Yes

☐ Somewhat

☐ No

☐ Don't
know/not
sure

If 'No' or 'Somewhat', please explain why and tell us what more we could do to improve our themes:

To what extent do you agree or disagree with the vision and themes of the strategy?

- ☐ Strongly agree ☒ Agree ☐ Neither agree nor disagree ☐ Disagree ☐ Strongly disagree

If you wish to explain your answer, or provide suggestions on how the themes or vision should change, please write in below:

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Actions

To deliver our strategy efficiently, effectively, transparently and in a way that is coordinated with our partners and communities we have developed a Business Plan to steer and focus our actions.

A Business Plan is an action-led plan focusing on delivering tasks which meet statutory responsibilities and contribute towards delivering our vision.

Actions identified under **Theme 1 (Delivering Effective Flood Risk Management Locally)** are:

- To do the work identified in the strategy and keep it up to date
- To review and revise the Flood Investigation Report Policy and the Consenting and Enforcement Policy for regulating Ordinary Watercourses
- To work proactively with Local Planning Authorities to ensure effective local policies are in place for managing flood risk and coastal erosion through the Land and Marine Planning Processes
- To consider the need for a Highway Drainage Connection Policy and a 'Designation of Flood Risk Features' Policy

Do you have any comments or further suggestions on these actions? Please write in below:

Consider the need to Manage flood risks created by rivers flowing into the County from neighbouring areas

Actions identified under **Theme 2 (Understanding our local risks and challenges)** are:

- Deliver any outstanding Surface Water Management Plans (SWMP), and identify further studies needed.
- To bid for funding to install groundwater monitoring equipment in targeted areas in Lancashire; to map all ordinary watercourses in Lancashire, using this to improve risk management; and to improve understanding of opportunities for natural flood management and strategic surface water management across Lancashire through sustainable drainage retrofit.

- To keep the Flood Risk Asset Register up to date
- To map all historic and new known flooding incidents since 2013
- To support development of an 'all source' flooding map for the North West, potentially via the Drainage and Wastewater Management Plan (DWMP)

Do you have any comments or further suggestions on these actions? Please write in below:

We feel historic and known flooding incidents must include far East Lancashire events. Earby, Kelbrook, Barnoldswick as examples

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Actions identified under Theme 3 (Supporting Sustainable Flood Resilient Development) are:

- Work with, support and advise Local Planning Authorities so their evidence base takes account of best practice, climate change, biodiversity net gain and amenity aspirations
- Encourage Local Planning Authorities to adopt the Sustainable Drainage Systems (SuDS) proforma on major developments, link into North West SuDS meetings, and ensure that SuDS assets are captured in Flood Risk Asset Registers
- Explore the feasibility of developing an integrated Lancashire-wide 'SuDS Suitability' guide
- Input on flood and coastal matters into the development of a natural capital accounting / biodiversity net gain approach for Lancashire
- Encourage all flood risk management authorities in Lancashire to become members of the Association of SuDS Authorities (ASA)

Do you have any comments or further suggestions on these actions? Please write in below:

We feel that adoption of SuDS by utility companies and Local lead flood authorities should be encouraged similar to the strategy in North Wales.

Actions identified under Theme 4 (Improving Engagement with our Flood Family) are:

- Improve our web presence on flooding and link pages to The Flood Hub, including a new Education section, and sharing Flood Action Group details where they consent to do so
- Improve maintenance on assets owned by flood risk management authorities
- Continue pro-active work with partnerships, including Catchment Partnerships with the community and private landowners and attending relevant partnership meetings to share best practice on technical knowledge, operational responses and infrastructure risks
- Develop a Communication and Engagement Plan showing clear lines of communication and reporting, within and amongst flood risk management authorities, wider partners and the people of Lancashire

Do you have any comments or further suggestions on these actions? Please write in below:

We agree with the development of communication and engagement plans and would hope this includes areas to the East of the County affected by flooding from neighbouring District's and Counties.

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Actions identified under Theme 5 (Maximising investment opportunities to better protect our businesses and customers) are:

- Deliver, monitor and share the investment programme, including identifying further opportunities for investment in flood and coast defences
- Develop a 'funding catalogue' of all potential sources of funding from public, private, voluntary and other sectors
- Establish a progress for the Partnership which facilitates quick allocation, approval and delivery of 'Quick Win' funding allocated annually to the Partnership, including governance and re-allocation of funding if needed
- Influence national thinking on flood insurance and grants for those affected by flooding to encourage a consistent approach from government rather than on a storm basis

Do you have any comments or further suggestions on these actions? Please write in below:

Agreed

Actions identified under Theme 6 (Contributing towards a sustainable, climate resilient Lancashire) are:

- Work with climate change action groups set up following Local Authority declaration of a climate emergency to ensure actions to address flood risk and coastal erosion are incorporated within climate change action plans
- Ensure a climate change allowance is incorporated into all proposed new sustainable drainage systems on developments consistent with national and/or local planning requirements and published guidance.
- Investigate the feasibility of introducing SuDS in schools across Lancashire to improve their resilience and provide an educational resource
- Explore the feasibility of delivering a series of 'water resilient parks' across Lancashire to introduce SuDS and natural flood management measures to contribute towards surface water storage where evidence shows this would be beneficial and financially viable
- In contributing towards a climate resilient highway network and economy, consider how Highway Authorities in Lancashire could adopt SuDS components

under the Highways Act 1980, and work with United Utilities to share learning following introduction of the Design and Construction Guide (DCG) for Sewers

Do you have any comments or further suggestions on these actions? Please write in below:

Agreed

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Updating the strategy

We propose to report progress on business plan actions at each Lancashire Flood and Coastal Erosion Risk Management Partnership strategic meeting which occurs quarterly. Do you support quarterly monitoring through the partnership or by other means (such as an Annual Progress Report)?

☐ I support quarterly monitoring through the Partnership governance

☐ I support an annual progress report published online

☒ I support quarterly monitoring through the Partnership and production of an annual progress report

☐ Other (please provide comments below)

☐ Unsure/No opinion

Please provide any comments/suggestions to support your response:

We are proposing to review the Draft Strategy after three years to ensure it remains up-to-date. Do you support a mid-term review?

☒ Yes

☐ No

☐ Other
(please explain)

☐ Don't know/not sure

If 'Don't Know/not sure' or 'Other', please explain why and provide comments/suggestions to support your response:

Thank you for taking the time to give us your views. Please click 'submit' to send your response.

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