

Kent Local Flood Risk Management Strategy 2024-2034

Consultation Report

June 2024

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1 Introduction

Kent County Council (KCC) is the Lead Local Flood Authority (LLFA) for Kent. As the LLFA, we have an overview role for local flooding, which is flooding that arises from surface water runoff, ordinary watercourses, and groundwater. Further information on our statutory duties as a LLFA is outlined in [Section 9 of the Flood and Water Management Act 2010](#).

We are developing a new Kent Flood Risk Management Strategy (“Local Strategy”) for the period 2024-2034. This will replace the second Local Strategy adopted by KCC in 2017, which was intended to last until 2023. The latest version is the third Local Strategy which will build upon the lessons we have learned from previous Local Strategies.

The Local Strategy has been developed in partnership with other risk management authorities in Kent and stakeholders to help us work together and continue to:

- reduce local flood risks
- develop our understanding of flood risk
- further improve our working relationships with partners and communities.

It also reflects the Environment Agency’s [National Flood and Coastal Erosion Risk Management Strategy for England](#).

The aim of the Local Strategy is:

“Through this Local Strategy for Kent, our aim is to improve the safety and wellbeing of Kent’s residents and the economy of Kent through appropriate local flood risk management.”

We plan on delivering this aim by working effectively with communities and partners, incorporating climate adaptation, and utilising natural processes to provide multiple benefits, where possible.

The document describes the flood risk in the county; the roles and responsibilities of risk management authorities operating in the county; the aims and objectives of the strategy; progress and ongoing challenges since the previous Local Strategy (2017-2023); and how we will deliver and monitor our progress.

The objectives of the Local Strategy are:

- Understanding flood risk
- Reduce the risk of flooding
- Resilient planning
- Resilient communities

We have identified actions to support the delivery of the objectives. We have also set out metrics and targets so that we can report on the delivery of the Local Strategy.

These metrics and targets are outlined in Table A1-1 and Table A1-2 of the Local Strategy.

We worked with other Risk Management Authorities in the county to set the objectives and the proposed actions. We also sought their input to the extended timeframe the Local Strategy would cover.

This report provides the results of the consultation on the draft Kent Local Flood Risk Management Strategy 2024-2034 as well as an overview of the updates made to the strategy and our responses to the themes and comments that arose. Appendix 1 provides more detail about the categorisation of comments into each theme.

2 Consultation process

Prior to the public consultation, the draft Local Strategy was presented to the Kent Flood Risk Management Committee on the 14 November 2023. A recording of committee meetings can be found on [Kent.gov.uk](https://www.kent.gov.uk). This was the first time the full draft of the Local Strategy was available to the public, as it was added as an appendix to the committee agenda.

The draft Local Strategy for 2024-2034 then went to consultation for 10-weeks, from 22 November 2023 to 30 January 2024.

The consultation provided the opportunity for residents and stakeholders to find out about the draft strategy and provide feedback. Feedback was captured via a consultation questionnaire which was available on the KCC engagement website 'Let's talk Kent' - www.kent.gov.uk/localfloodrisk. Hard copies of the consultation questionnaire were also available on request.

At consultation stage, an Equality Impact Assessment (EqIA) was carried out to assess the impact the strategy could have on those with protected characteristics. The EqIA was available as one of the consultation documents and the questionnaire invited respondents to comment on the assessment that had been carried out. The draft Local Strategy and large print version of the draft Local Strategy, along with the EqIA were available to download. A Microsoft Word version of the online questionnaire could also be downloaded and sent back either by post or email.

Emails sharing details of the consultation were sent directly to key stakeholders, shown in Table 1.

Table 1: List of key stakeholders contacted using email to share the consultation details.

- ADEPT Flood and Water Management Group
- District and Borough Councils in Kent
- Environment Agency
- Thames Water
- Southern Water
- Upper Medway Internal Drainage Board
- Wider KCC Members

- KCC Highways
- Kent Association of Local Councils
- Kent Flood Action Group Forum
- Kent Flood Risk Management Network
- Kent Resilience Forum
- Lower Medway Internal Drainage Board
- North Kent Marshes Internal Drainage Board
- River Stour Internal Drainage Board
- Romney Marshes Internal Drainage Board
- High Weald
- Kent Downs
- Kent Greenpeace
- Kent Local Extinction Rebellion Groups
- Kent Local Friends of the Earth Groups
- Kent Local Transition Groups
- Kent Wildlife Trust
- South East Rivers Trust
- Town and Parish Councils in Kent
- Wildwood Trust

Social media posts were created at regular intervals during the consultation period. The posts were on KCC’s corporate social media channels; X/Twitter, Facebook, Nextdoor, and LinkedIn. An example of the social media posts promoting the consultation is shown in Figure 1. The social media posts were seen by 176,200 people and generated 429 clicks to the consultation page.



Figure 1: Kent County Council social media post on twitter.com/Kent_cc to promote the Local Flood Risk Management Strategy 2024-2034 consultation. This social media post was produced on the 17 January 2024.

An email banner was created and used by colleagues within the Flood and Water Management team to promote the Local Strategy consultation, shown in Figure 2.

Kent Local Flood Risk Management Strategy 2024-2034

Public consultation

Find out more and have your say by visiting:

www.kent.gov.uk/localfloodrisk



Figure 2: Email banner used to promote the Local Strategy consultation.

A [media release](#) was issued on the 22 November 2023. An article was included in KCC's resident e-newsletter [edition 75](#) which was sent out on the 23 November 2023. The Kent Association of Local Council (KALC) newsletter, website and social media channels displayed information about the Local Strategy consultation, on our behalf. An invitation to participate in the consultation was sent to 8,774 people registered with Let's Talk Kent who have expressed an interest in being kept informed of consultations regarding the environment and countryside. Water Magazine published an [article](#) to promote the consultation, on the 20 December 2023.

Promotion of the consultation to KCC staff was undertaken via internal staff communication platforms, such as Viva Engage.

In total there were 6,811 page views by 2,191 visitors, with 1,074 document downloads (including 865 downloads of the draft Local Strategy and 132 downloads of the questionnaire). We received a total of 148 responses for this consultation. A total of 137 responses were made using the online consultation questionnaire provided. A further 11 free text responses were received by email.

Respondents were asked how they found out about this consultation, 137 respondents answered this question with most visitors being directed to the consultation webpage from an email from Let's Talk Kent / KCC's Engagement and Consultation Team (74 respondents), or an email from KCC's Flood and Water Management Team (23 respondents). 3 respondents were directed by a friend or relative, with a further 3 respondents being directed by a KCC County Councillor, 2 people found out about the consultation by visiting Kent.gov.uk website. Social media also played a role in directing visitors to the webpage, especially Facebook (11 respondents) and Nextdoor (3 respondents). 12 people were directed to the consultation by their parish, town, borough or district council.

3 Information about consultation respondents

We asked respondents the capacity in which they were responding to the consultation/ Table 2 shows everyone who responded (a total of 148 respondents including both email and questionnaire responses):

Table 2: Answers to the question: Please tell us in what capacity you are completing this questionnaire. The table includes data from the consultation questionnaire responses and free text email responses.

Type of respondent	Number of responses (148)	Proportion of total responses
Kent Resident (living in the Kent County Council authority area)	114	77%
On behalf of a District or Borough Council, in an official capacity	5	3%
On behalf of a Town or Parish Council, in an official capacity	19	13%
Resident from somewhere else, such as Medway	1	1%
Risk Management Authority	2	1%
Flood Action Group	2	1%
Flood Warden	1	1%
Other organisations	3	2%
Unknown	1	1%

Most responses to the consultation were from residents (115 responses, 78%). 32 responses were from organisations acting in an official capacity (21% of all responses).

3.1 'More About You' data analysis

The tables and graphs within this section show the profile of respondents who completed the online consultation questionnaire. Please note that the demographic questions were optional and only asked of those who indicated they are responding as an individual rather than on behalf of an organisation. The proportion of responders who left these questions blank or indicated they did not want to disclose this information have also been included.

Table 3 shows the genders represented within the responses (137 responses). The sum of the percentages may not sum to 100% due to rounding.

Table 3: Consultation questionnaire respondent demographics.

Gender	Number of responses	Percentage
Female	30	22%
Male	50	37%
Responding on behalf of an organisation	16	12%
Do not want to take part	38	28%
Undisclosed	1	1%

57% of the 137 people who provided a response also stated that they had the same gender of which they were assigned at birth. No respondents disclosed that they were not of the same gender of which they were assigned at birth, with 2 respondents leaving this answer blank and 1 respondent preferring not to say.

Table 4 shows the age groups represented within the responses. There were 82 responses to this question, with all respondents being over 35 years of age. 82% of respondents were between 50-84 years of age.

Table 4: Age groups of respondents to the online consultation questionnaire.

Age group	Number of responses	Proportion of total
35-49	4	5%
50-59	20	24%
60-64	13	16%
65-74	26	32%
75-84	16	20%
85 and over	2	2%
Prefer not to say	1	1%

Table 5 shows how many respondents regard themselves as belonging to a particular religion or holding a particular belief. All 28 respondents who disclosed that they do regard themselves as belonging to a particular religion of belief were Christian.

Table 5: Percentage of respondents to the consultation question - Do you regard yourself as belonging to a particular religion or holding a belief?

Religion or holding a belief	Number of responses	Proportion of total
Yes	28	34%
No	50	61%
Prefer not to say	4	5%

Table 6 shows how many respondents consider themselves as having a disability as set out under The Equality Act 2010. 82 respondents answered this question.

Table 6: Percentage of respondents to the consultation questionnaire - Do you consider yourself to be disabled as set out in the Equality Act 2010?

Do you consider yourself to be disabled as set out in the Equality Act 2010?	Number of responses	Proportion of total
Yes	10	12%
No	68	83%
Prefer not to say	4	5%

Of those respondents that indicated that they do have a disability, there were 6 with a longstanding illness, 2 with a mental health condition, 1 with a sensory impairment, and 6 with a physical impairment. Respondents were able to select more than one answer for this question, so one respondent may be represented as having more than one disability and/or health condition.

Table 7 shows which ethnic groups respondents felt they belonged to. The majority of respondents identified as White English (70 respondents, 86%) with 79 respondents identifying as White (97% of respondents).

Table 7: Responses to the online consultation question (81 respondents) - To which of these ethnic groups do you feel you belong?

Ethnic group	Number of responses	Proportion of total
British/Irish	1	1%
White Australian	1	1%
White British	5	6%

Ethnic group	Number of responses	Proportion of total
White English	70	86%
White European	1	1%
White Irish Traveller	1	1%
White Scottish	1	1%
Prefer not to say	1	1%

We asked respondents to provide the first five characters of their postcode so that we could determine the spread of responses. This information is shown in Figure 3.

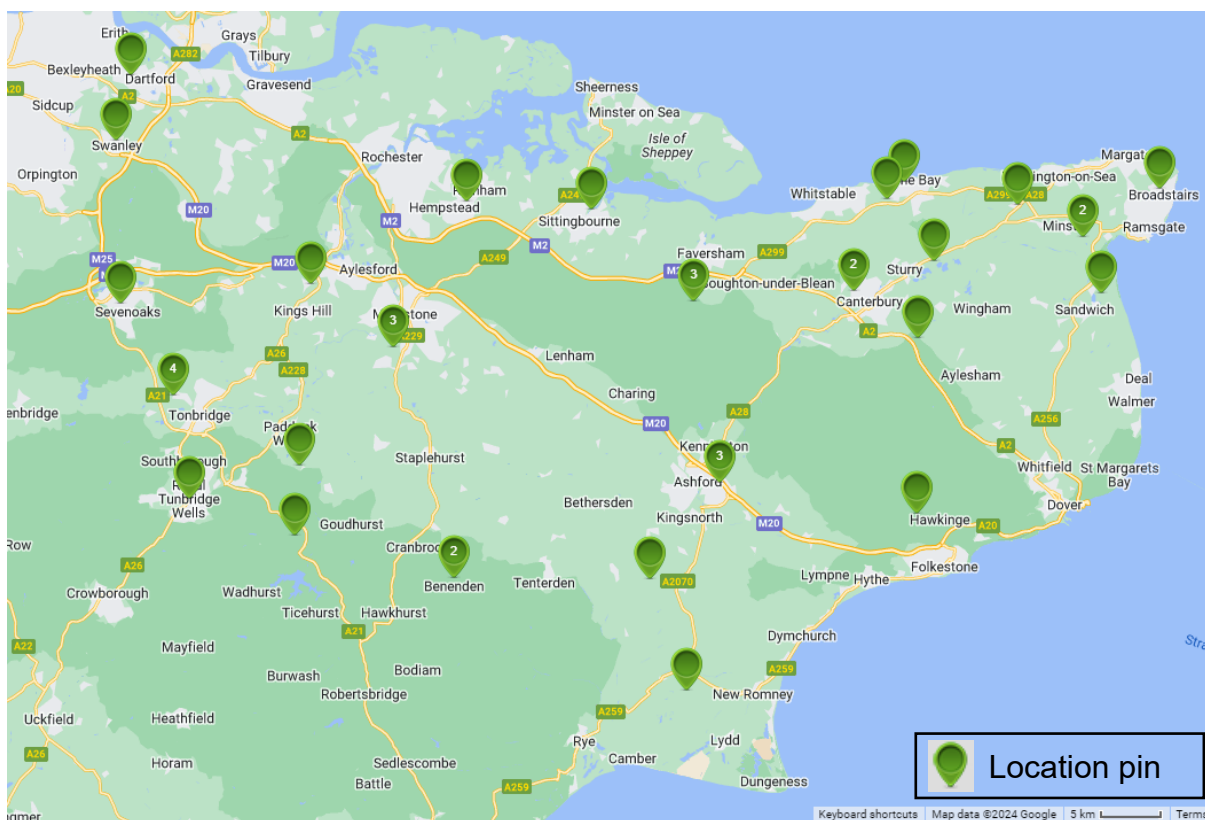


Figure 3: Map to show the locations of respondents using the first five characters of their postcode. The map was created using <https://fortress.maptive.com>.

Figure 3 shows a wide spread of responses across Kent. Respondents who stated their postcode began with CT had a much broader opinion on “To what extent do you agree or disagree that the draft Kent Local Flood Risk Management Strategy 2024-2034 (Local Strategy) clearly sets out our strategy for local flood risk management in Kent?” Whereas, respondents who stated their postcode began with TN mainly tended to agree (25 respondents).

The majority of respondents who stated their postcode began with ME also tended to agree (13 respondents), with 5 respondents tending not to agree, and no respondents strongly disagreeing.

4 Consultation responses

This section of the report sets out the responses to the questions about specific content of the draft Local Flood Risk Management Strategy. The responses received have helped us to understand where we may need to make amendments to the draft Local Strategy before finalising it for adoption.

Respondents were asked to indicate the extent to which they agreed or disagreed with a series of proposals put forward in the consultation document.

Not many residents had a strong opinion towards the question “To what extent do you agree or disagree that the draft Kent Local Flood Risk Management Strategy 2024-2034 (Local Strategy) clearly sets out our strategy for local flood risk management in Kent?”, with most residents tending to agree (18 respondents), which was closely followed by residents neither agreeing or disagreeing (11 respondents) and tending to disagree (11 respondents).

Appendix 1 gives details of the themes that arose from the free text comments with an explanation on how comments were themed. A free text response may cross over more than one theme.

4.1 Overall agreement or disagreement with the Local Strategy

4.1.1 To what extent do you agree or disagree that the draft Kent Local Flood Risk Management Strategy 2024-2034 (Local Strategy) clearly sets out our strategy for local flood risk management in Kent?

Figure 4 shows 56% of 137 respondents agreed that the draft Local Strategy clearly set out our strategy for local flood risk management, with 12% strongly agreeing. 22% of respondents answered that they either tended to disagree or strongly disagreed and 19% indicated they neither agreed nor disagreed. The sum of individual percentages may not sum to 100% due to rounding.

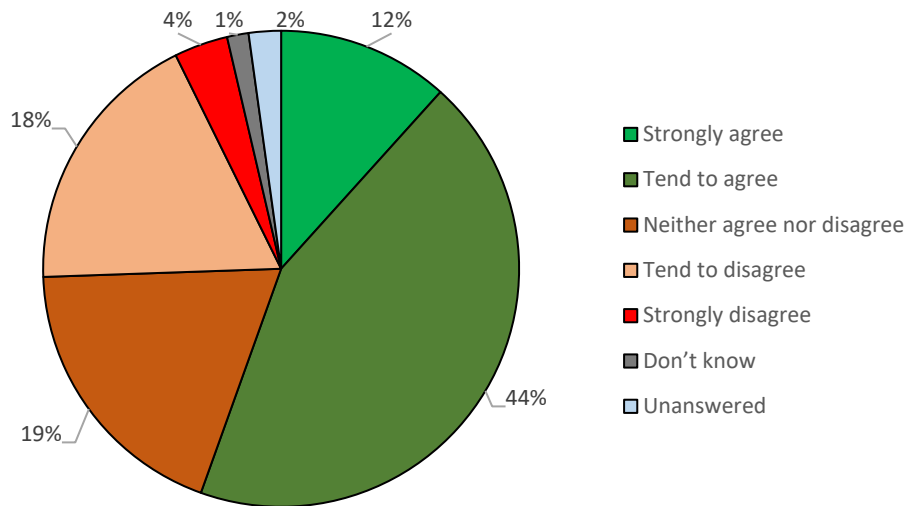


Figure 4: Pie chart showing responses to: To what extent do you agree or disagree that the draft Kent Local Flood Risk Management Strategy 2024-2034 (Local Strategy) clearly sets out our strategy for local flood risk management in Kent?

4.1.2 General Comments

Respondents were given the opportunity to provide a reason for their response to this question. The responses provided to the consultation covered a range of themes, these are shown in Table 8. Some responses contained more than one theme.

Table 8: Emerging themes for comments regarding 'To what extent do you agree or disagree that the draft Kent Local Flood Risk Management Strategy 2024-2034 (Local Strategy) clearly sets out our strategy for local flood risk management in Kent?'

Themes	Number of comments	Percentage
Misunderstanding/clarity	19	11%
Out of scope	26	13%
Highways drainage	4	2%
Land drainage	5	3%
Powers (water companies etc)	4	2%
Powers (other)	3	2%
Powers (development, planning)	5	3%
Planning	11	6%
Community resilience	2	1%
Actions/metrics/review/data	30	17%
Location specific	16	9%
General/positive comments	51	29%

Two key themes emerged from these responses, 17% of comments were regarding the lack of an action plan to deliver the Local Strategy and how the success of the strategy will be measured; and 13% are in the theme of responses that are out of scope of the strategy. The following quotes are examples of the responses we received:

“lacks any content that one might think it refers to Kent”

“there is too much about the process and too little about action.”

“no clear actions or measurement on the success of the strategies.”

29% of the comments were general/positive comments for example:

“The strategy is clearly structured and addresses relevant issues.”

“I think this document is a good template going forward.”

4.1.3 You said, we did

Kent faces extensive flood risk and setting it out in detail would make the document very large. We have prepared the Flood Risk to Communities documents that set out the flood risks in the county on a borough-by-borough basis and provide more detailed, local information. We will make the links to these documents more prominent within the Local Strategy and their role alongside it clearer.

It is difficult to set out an action plan for a 10-year strategy that will be realistic and deliverable, especially as we are reliant on partners to help us achieve many of the objectives. However, we recognise that some aspects of the Local Strategy require more clarity around how we will achieve them. We will set out our annual action plans in the Annual Review that we will prepare each year, to report on the success of the Local Strategy.

We also recognise that the success of the Local Strategy needs to be measurable, and targets are an important way to measure success. In some areas this is difficult, as we do not have enough data to benchmark a target or we cannot influence enough of the factors of success to confidently set a target. Where we can, we have set out targets and we will collect data in other areas so that we can set targets in a future review of the Local Strategy.

4.2 Objective 1

4.2.1 To what extent do you agree or disagree with Objective 1 as set out in the draft Local Strategy?

69% of respondents indicated they agree with Objective 1 as set out in the draft Local Strategy, with 27% strongly agreeing. 16% of respondents indicated they disagreed with Objective 1 and 11% indicated they neither agreed nor disagreed.

Figure 5 shows the responses within a pie chart. The respondents displayed used the questionnaire (a total of 137 respondents). The sum of individual percentages may not sum to 100% due to rounding.

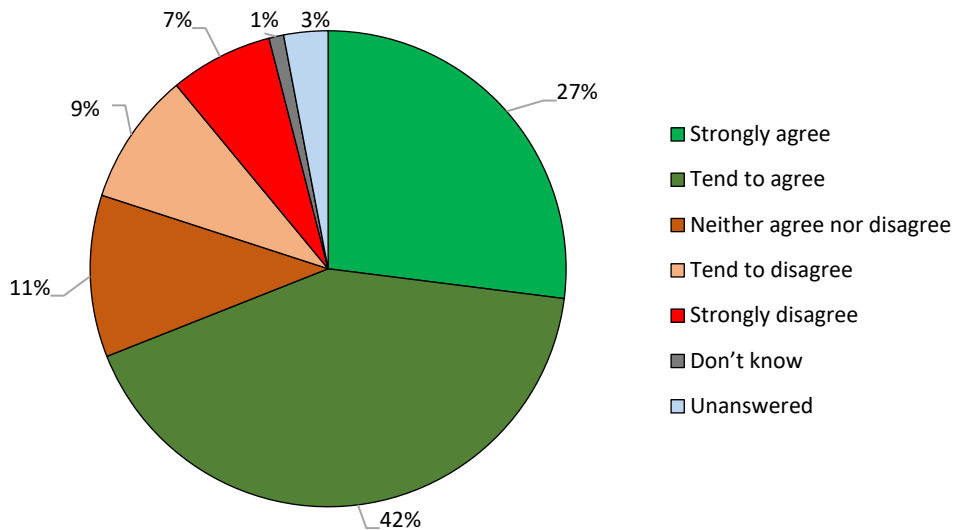


Figure 5: Pie chart showing responses to: To what extent do you agree or disagree with Objective 1 as set out in the draft Local Strategy?

4.2.2 To what extent do you agree or disagree with the actions set out in the 'To achieve this we will...' section for Objective 1?

Figures 6 to 10 show a summary of responses to the consultation questionnaire regarding each action set out to achieve Objective 1. Over 60% of respondents agreed with each of the actions conveyed to achieve Objective 1.

Figure 6 shows 70% of respondents indicated they agree with the action 'to improve communication and data sharing between risk management authorities following flood events' as set out in Objective 1 in the draft Local Strategy, with 39% strongly agreeing. 8% of respondents indicated they disagreed with this action and 18% indicated they neither agreed nor disagreed.

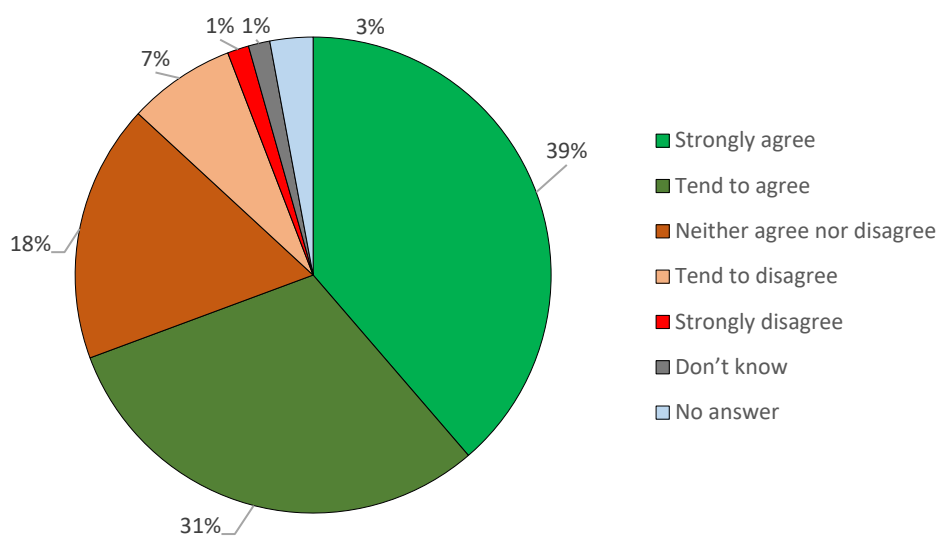


Figure 6 3: Pie chart showing responses to: Improve communication and data sharing between risk management authorities following flood events.

Figure 7 shows 75% of respondents indicated they agree with the action 'to continue to undertake Section 19 investigations of significant floods in Kent' as set out in Objective 1 in the draft Local Strategy, with 39% strongly agreeing. 6% of respondents indicated they disagreed with this action and 13% indicated they neither agreed nor disagreed.

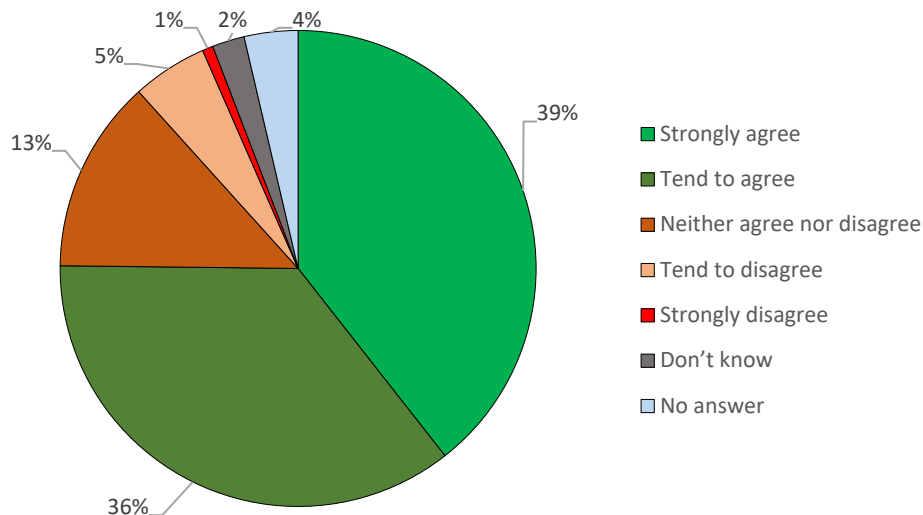


Figure 7: Pie chart showing responses to: Continue to undertake Section 19 investigations of significant floods in Kent.

Figure 8 shows 63% of respondents indicated they agree with the action 'to support the next round of water company Drainage and Wastewater Management Plans', as set out in Objective 1 in the draft Local Strategy, with 31% strongly agreeing. 11% of respondents indicated they disagreed with this action and 20% indicated they neither agreed nor disagreed.

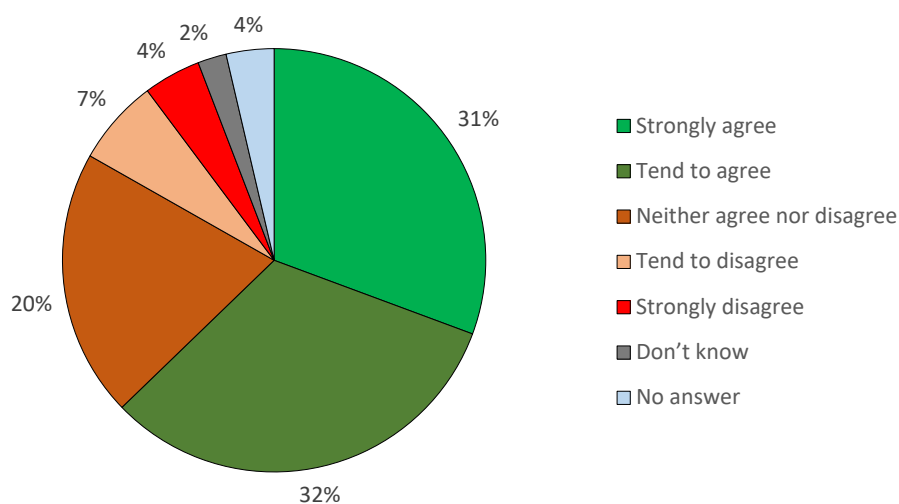


Figure 8: Pie chart showing responses to: Support the next round of water company Drainage and Wastewater Management Plans.

Figure 9 shows 72% of respondents indicated they agree with the action 'to maintain the asset register and work with partners to understand opportunities to improve it', as set out in Objective 1 in the draft Local Strategy, with 37% strongly agreeing. 7% of respondents indicated they disagreed with this action and 15% indicated they neither agreed nor disagreed.

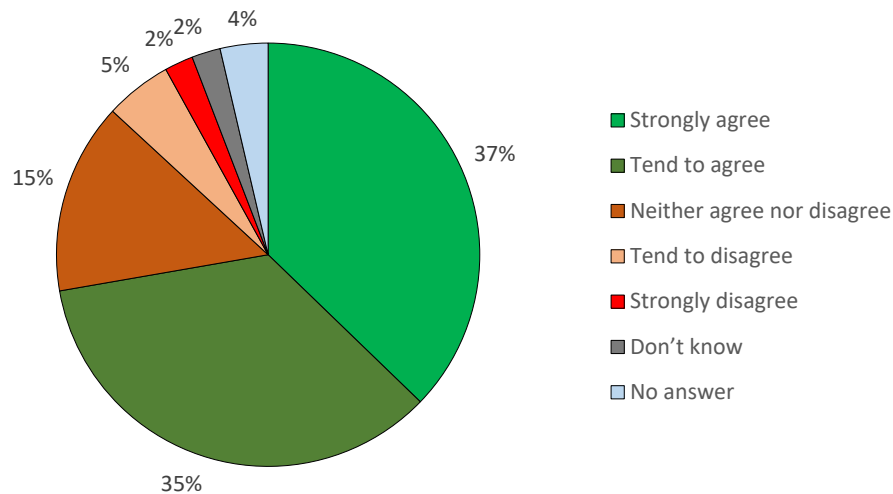


Figure 9: Pie chart showing responses to: Maintain the asset register and work with partners to understand opportunities to improve it.

Figure 10 shows 69% of respondents indicated they agree with the action 'Include climate change assessments in flood risk investigations', as set out in Objective 1 in the draft Local Strategy, with 43% strongly agreeing. 11% of respondents indicated they disagreed with this action and 14% indicated they neither agreed nor disagreed.

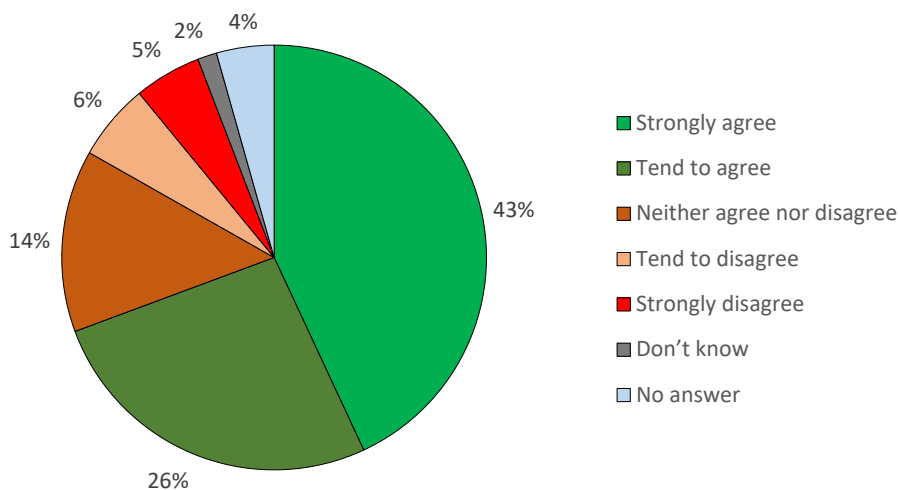


Figure 104: Pie chart showing responses to: Include climate change assessments in flood risk investigations.

4.2.3 To what extent do you agree or disagree with how we will measure the activities we will undertake to achieve the delivery of Objective 1?

Figure 11 shows the percentage of responses to this question. 65% of 137 respondents agreed with how we propose to measure the activities we will undertake to achieve the delivery of Objective 1, with 23% strongly agreeing. 11% of respondents disagreed with how we propose to measure the activities we will undertake to achieve the delivery of Objective 1, as set out within the draft Local Strategy. 20% of respondents neither agreed nor disagreed.

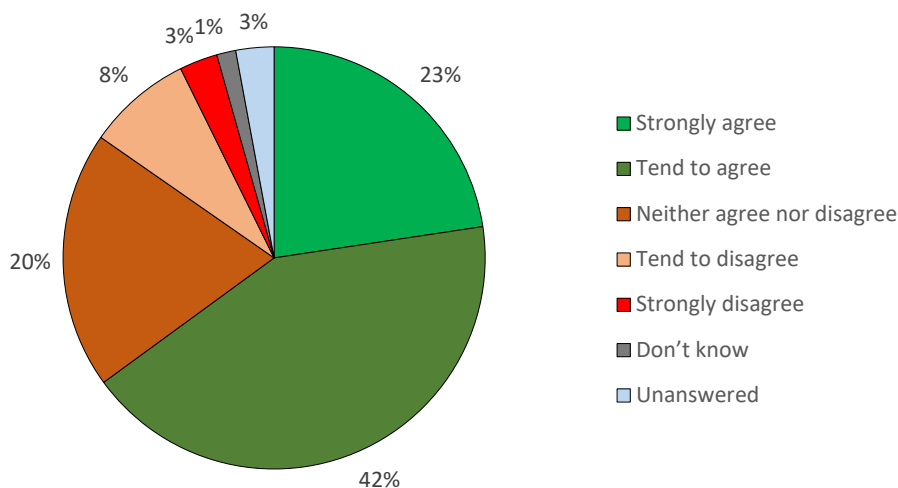


Figure 11: Pie chart showing responses to: To what extent do you agree or disagree with how we will measure the activities we will undertake to achieve the delivery of Objective 1?

4.2.4 Objective 1 comments

Respondents were given the opportunity to provide comments on Objective 1, including any actions or activities we have missed that could help to achieve this objective. The responses provided covered a range of themes, these are shown in Table 9. Some responses contained more than one theme.

Table 9: Emerging themes for comments regarding 'If you would like to provide comments on Objective 1, including any of the actions and/or activities we will undertake to achieve this objective, please tell us... If you have any suggestions on other actions, activities or metrics you would like us to report on annually, please include these in your answer.'

Themes	Number of comments	Percentage
Misunderstanding/clarity	14	13%
Out of scope	13	12%
Highways drainage	7	6%
Land drainage	3	3%
Powers (water companies)	4	4%
Powers (other)	3	3%
Powers (development, planning)	2	2%
Planning	2	2%

Themes	Number of comments	Percentage
Community resilience	3	3%
Actions/metrics/review/data	31	28%
Location specific	9	8%
General/positive comments	19	17%

The key theme that emerged from the comments regarding Objective 1, with 28% of comments in this theme, is the lack of an action plan to deliver Objective 1 and how the success of the strategy will be measured.

“although I agree with the actions listed - they are not enough to lead to me agreeing with the objective and action plan overall”

“For Objective 1 - There are no targets in the metrics. However the metrics appear logical and sound.”

This is followed by 13% of comments within the theme of a misunderstanding or lack of clarity in the strategy and 12% of comments regarding concerns that are out of scope.

Comments on this section also indicate that the meaning of “understand” in this objective may have been misunderstood, with some respondents seeing it as referring to the understanding of the general population. Whereas, we are referring to the gathering and improving data and information about flood risk to improve the understanding of it, principally by risk management authorities. We have clarified the text within Objective 1 of the Local Strategy to better reflect this. Supporting communities and residents to access this information is in Objective 4.

“Educate/advise residents of the ways they can protect themselves against flood risks”

Some responders to Objective 1 focussed on water companies and our relationship with them, particularly our role in regulating them.

“Are we able to penalise water companies?”

KCC does not have powers to regulate water companies, but we do work closely with them. We are working with them to reduce the amount of highway runoff that enters their sewers and causes sewage overflows, and we work with them to develop their Drainage and Wastewater Management Plans. Management of surface water is important for water companies to meet their targets under the Environment Act 2022 to reduce sewage overflows. This provides an opportunity for Lead Local Flood Authorities to work more closely with water companies, which we are keen to do.

Respondents also commented on Section 19 Investigations. Some respondents asked that the criteria for Section 19s to be clearer. Others have suggested that these investigations are undertaken more quickly and that they are prepared in conjunction with the local communities. Others have also asked that they be used as a learning opportunity for all risk management authorities.

“Better define the purpose of the S.19 Investigations and when we would commission a S.19 investigation. Are we able to penalise water companies?”

“S.19s process should be quicker”

“linked to improving comms and data sharing of RMAs following flood events”

Respondents also asked for more details about the asset register and what role it played in delivering the Local Strategy, for example:

“Define the asset register”

17% of the comments were general/positive comments, for example:

“I think you will struggle to beat nature and believe that most action taken will only move the problem”

“The basics need to be done before anything else can be accomplished”

4.2.5 You said, we did

We have clarified the purpose of Objective 1, to make it clear that it is about the gathering and improvement of data and information on flood risk. Access to this information by communities and residents is set out in Objective 4.

We have improved the Local Strategy by including links to websites with more information; for example, to add detail about Section 19 investigations. We have been working to make delivering Section 19 Investigation Reports quicker and we hope that this will be achieved soon.

Local communities are always engaged in the Section 19 investigations. This engagement may vary depending on who in the community takes an interest and who is impacted by the flooding. We will improve this engagement with local communities and add a measure of their engagement to the Local Strategy.

Not all risk management authorities are impacted by, or mentioned in Section 19 investigations and subsequent reports, however, we always liaise with the risk management authorities that are impacted or mentioned. There are sometimes broader issues that emerge from these investigations that we discuss with other risk management authorities and flood responders.

We have removed the asset register and the associated metrics from the Local Strategy, as this is a part of our role as the Lead Local Flood Authority, it is not a direct measure of the effectiveness of the Local Strategy.

4.3 Objective 2

4.3.1 To what extent do you agree or disagree with Objective 2 as set out in the draft Local Strategy?

Figure 12 shows the percentage of responses to the questionnaire (total of 137 respondents). 70% of respondents indicated that they agree with Objective 2 as set out in the draft Local Strategy, half of which strongly agreed. 12% of respondents disagreed with Objective 2 of the draft Local Strategy and 12% neither agreed nor disagreed. The sum of individual percentages may not sum to 100% due to rounding.

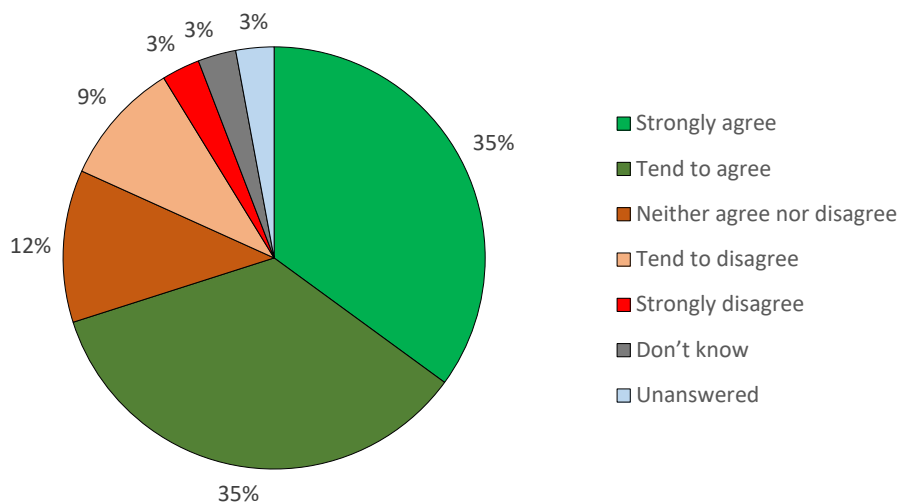


Figure 125: Pie chart to show responses to: To what extent do you agree or disagree with Objective 2 as set out in the draft Local Strategy?

4.3.2 To what extent do you agree or disagree with the actions set out in the 'To achieve this we will...' section for Objective 2?

Figures 13 to 17 show the percentages of responses to the consultation questionnaire regarding each action set out to achieve Objective 2. Over 60% of respondents agreed with each of the actions conveyed to achieve Objective 2.

Figure 13 shows the percentage of responses to this question. 67% of 137 respondents agreed to achieve Objective 2 'we will deliver more schemes to reduce the risk of local flooding', as set out within the draft Local Strategy, with 41% strongly agreeing. 10% of respondents disagreed with this action and 16% of respondents neither agreed nor disagreed.

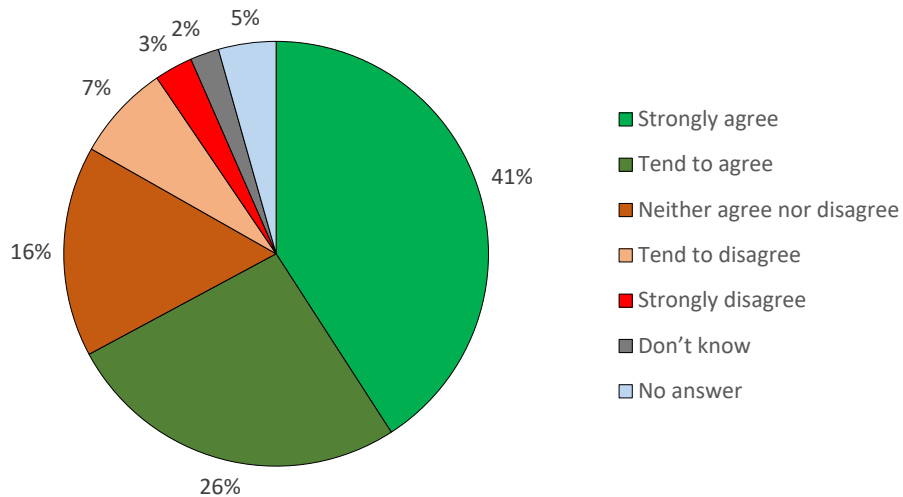


Figure 13: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will deliver more schemes to reduce the risk of local flooding'.

Figure 14 shows the percentage of responses to this question. 73% of 137 respondents agreed to achieve Objective 2 'we will work with partners to co-deliver schemes', as set out within the draft Local Strategy, with 44% strongly agreeing. 9% of respondents disagreed with this action and 12% of respondents neither agreed nor disagreed.

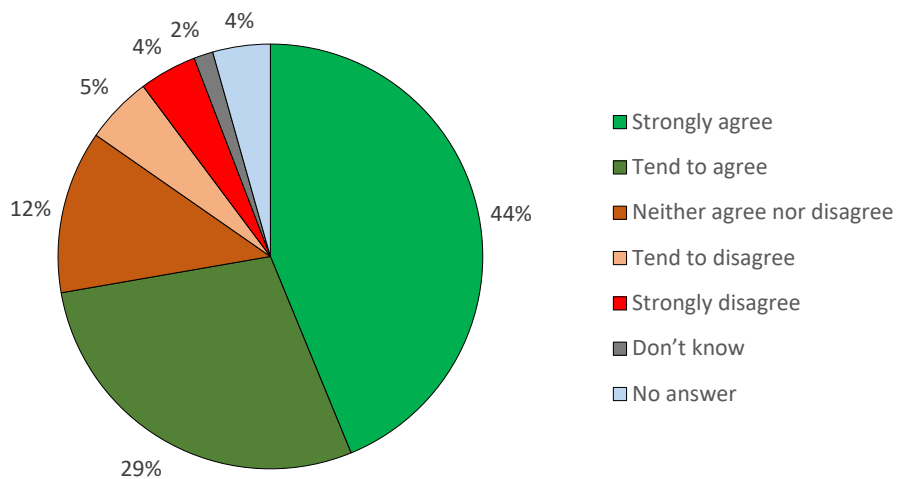


Figure 14: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... work with partners to co-deliver schemes'.

Figure 15 shows the percentage of responses to this question. 60% of 137 respondents agreed to achieve Objective 2 'we will support Southern Water's Clean Rivers and Seas Taskforce', as set out within the draft Local Strategy, with 37% strongly agreeing. 12% of respondents disagreed with this action and 21% of respondents neither agreed nor disagreed.

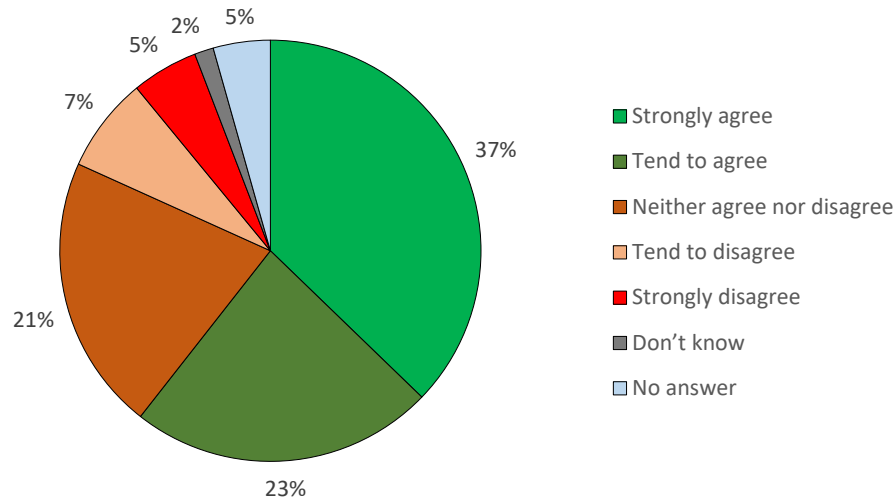


Figure 15: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... support Southern Water's Clean Rivers and Seas Taskforce'.

Figure 16 shows the percentage of responses to this question. 66% of 137 respondents agreed to achieve Objective 2 'we will ensure multiple benefits are included in flood risk management schemes', as set out within the draft Local Strategy, with 35% strongly agreeing. 9% of respondents disagreed with this action and 18% of respondents neither agreed nor disagreed.

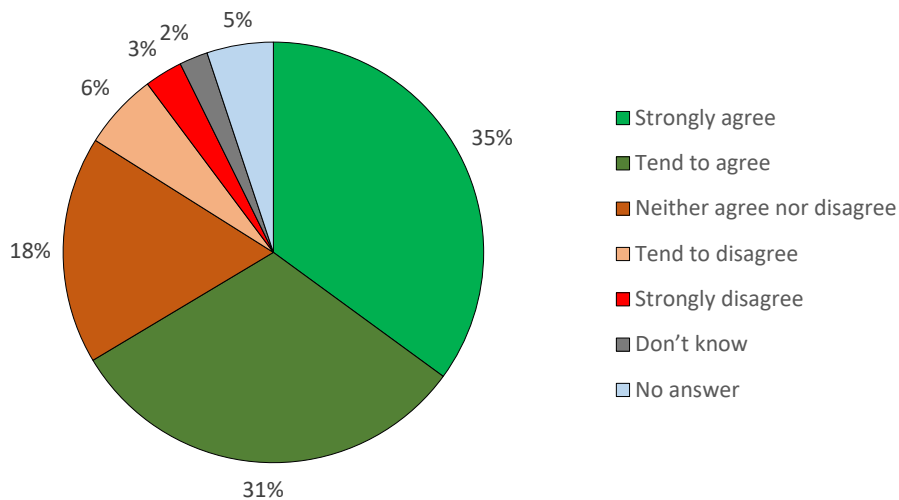


Figure 16: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... ensure multiple benefits are included in flood risk management schemes.'

Figure 17 shows the percentage of responses to this question. 72% of 137 respondents agreed to achieve Objective 2 'we will continue to provide advice on land drainage and riparian responsibilities', as set out within the draft Local Strategy, with 47% strongly agreeing. 7% of respondents disagreed with this action and 14% of respondents neither agreed nor disagreed.

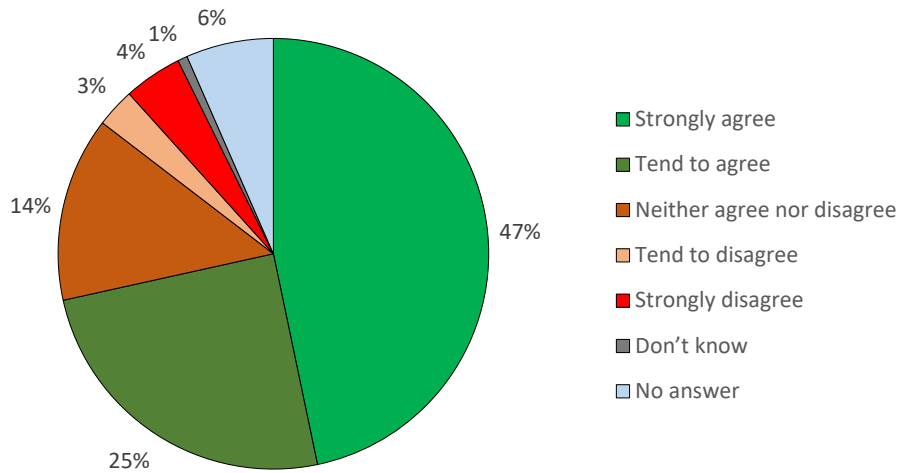


Figure 176: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... continue to provide advice on land drainage and riparian responsibilities.'

4.3.3 To what extent do you agree or disagree with how we will measure the activities we will undertake to achieve the delivery of Objective 2?

Figure 18 shows the percentage of responses to the questionnaire. 59% of 132 respondents agreed with 'how we will measure the activities to achieve the delivery of Objective 2' with 20% strongly agreeing. 13% of respondents disagreed with how we propose to measure the activities to achieve the delivery of Objective 2. Plus, 21% of respondents neither agree nor disagree. The sum of individual percentages may not sum to 100% due to rounding.

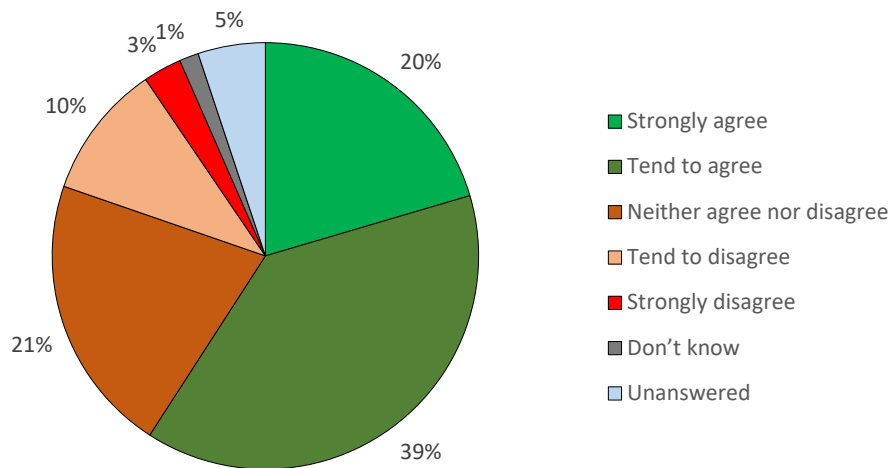


Figure 18: Pie chart to show responses to: To what extent do you agree or disagree with how we will measure the activities we will undertake to achieve the delivery of Objective 2?

4.3.4 Objective 2 comments

There were a significant range of themes for comments for Objective 2, shown in Table 10, including comments on planning, and about the maintenance of highway drainage assets. Planning comments have been responded to under the Objective 3 discussion (Section 4.4). Highways drainage assets are managed through the highways division and is not part of the scope for this Local Strategy.

Table 10: Emerging themes for comments regarding ‘If you would like to provide comments on Objective 2, including any of the actions and/or activities we will undertake to achieve this objective, please tell us... If you have any suggestions on other actions, activities or metrics you would like us to report on annually, please include these in your answer.’

Themes	Number of comments	Percentage
Misunderstanding/clarity	19	16%
Out of scope	10	8%
Highways drainage	11	9%
Land drainage	12	10%
Powers (water companies)	2	2%
Powers (other)	1	1%
Powers (development, planning)	1	1%
Planning	8	7%
Community resilience	3	3%
Actions/metrics/review/data	26	22%
Location specific	8	7%
General/positive comments	17	14%

Some responses contained more than one theme, but the key theme that emerges from the comments regarding Objective 2, with 22% of comments, is the lack of an action plan to deliver the Local Strategy and how the success of the strategy will be measured.

There are also a number of comments on the measures set out for this objective. In particular, there are several comments about how the measures reflected the success of the Local Strategy, and whether we were measuring the appropriate metrics.

“While it is helpful to count the number of schemes delivered - it would be more meaningful to know how many homes and businesses that were at risk of flooding have had that risk removed or reduced”

“the number of schemes delivered as part of the Clean Rivers and Seas Taskforce - we feel it needs a further reporting metric to give the scale of the schemes”

For Objective 2, 16% of the comments are within the theme of a misunderstanding or lack of clarity in the strategy, 10% regarding land drainage and 9% regarding Highway drainage maintenance. Comments tended to focus on the need for more

maintenance. KCC is one of the land drainage authorities in the county, however, we do not undertake regular maintenance of watercourses as it is not within our powers, similarly this strategy does not cover the maintenance of highway assets and maintenance activities falls outside the scope of this Local Strategy.

Some of the comments for this objective noted that the measures on our land drainage role do not give a sense of the flood risk management benefit we are able to provide.

“advice on land drainage will be helpful - it is not a useful measure - it would be more meaningful to know about the impact of advice”

There are further comments about water companies, some of these are similar to the comments under Objective 1 in Section 4.2. Comments under this objective also included whether KCC should be working with them and whether it affects our ability to comment on their plans.

“Supporting Southern Waters Clear Rivers etc Taskforce - does this include critical examination of Southern Waters plans?”

“Working with a fined water company does not inspire confidence. Do we trust the water companies?”

KCC’s work with Southern Water does not compromise our role as a consultee for their plans, any comments we make on these will be as robust as they would be if we were not partners with them. We understand the strong feelings about Southern Water and their track record, however, they remain the sewerage undertaker for the majority of the county, and only they can lead the reduction of sewage overflows that are necessary to improve the environment in Kent. KCC has a key role as a partner in supporting this work, choosing not to work with them on principle is likely to lead to worse outcomes for the environment.

17% of the comments were general/positive comments for example:

“Collecting data and running support schemes is all very well but positive action needs to be taken.”

“Surely any evidence will be self evident by matters getting better or deteriorating.”

4.3.5 You said, we did:

We have reviewed the measures we are proposing and have considered targets for some of these to make measuring the success of Objective 2 more comparable each year. We have introduced targets for the schemes we deliver, setting a target of 100 properties better protected within one year, and 2 hectares of impermeable surface is to be disconnected from the foul and/or combined sewer networks.

Given that the Clean River’s and Seas Taskforce is a Southern Water led programme, we did not feel it appropriate to set a target for this. Similarly, we won’t report any wider benefits from this programme, for instance benefits to the

environment, as this is for Southern Water to measure. However, we will provide links to where they publish this information in the Annual Review.

We will also include a metric to measure the effect that our land drainage advice has on flood risk. This will include betterment to land drainage consent applications as a result of our comments.

We have considered targets in other areas, however, we currently lack a robust baseline for some of these metrics, therefore, we cannot set a sensible target. We will continue to measure these metrics and will review the targets annually.

We have provided links to more information about highways drainage in the Local Strategy.

4.4 Objective 3

4.4.1 To what extent do you agree or disagree with Objective 3 as set out in the draft Local Strategy?

Figure 19 shows the percentages of responses to the consultation questionnaire. 68% of respondents indicated that they agree with Objective 3 as set out in the draft Local Strategy, with 39% strongly agreeing. 11% of respondents indicated that they disagreed with Objective 3, with 12% neither agreeing nor disagreeing. The sum of individual percentages may not sum to 100% due to rounding.

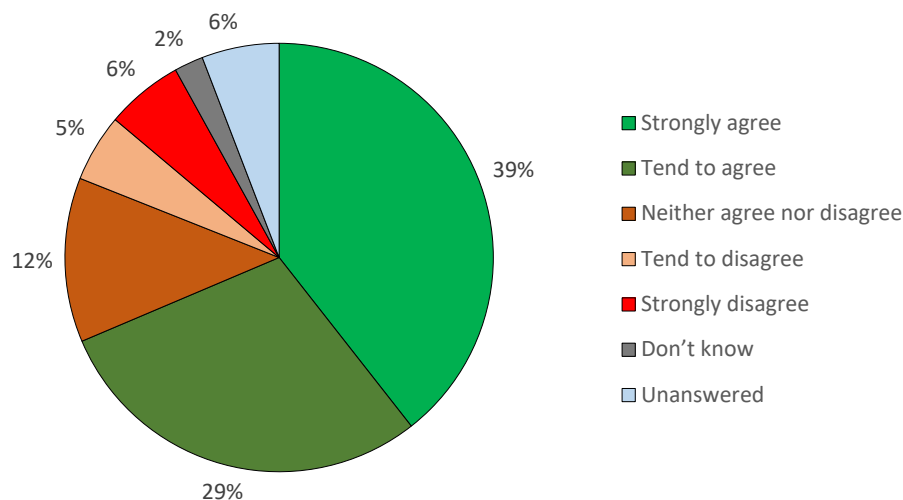


Figure 19: Pie chart to show responses to: To what extent do you agree or disagree with Objective 3 as set out in the draft Local Strategy?

4.4.2 To what extent do you agree or disagree with the actions set out in the 'To achieve this we will...' section for Objective 3?

Figures 20 to 22 show the percentages of responses to the consultation questionnaire regarding each action set out to achieve Objective 3. Over 60% of 137 respondents agreed with each of the actions conveyed to achieve Objective 3. The sum of individual percentages may not sum to 100% due to rounding.

Figure 20 shows the percentage of responses to this question. 71% of 137 respondents agreed to achieve Objective 3 'we will continue to encourage and support planning applications to appropriately consider the delivery of Sustainable Drainage Systems and reduce flood risk where possible', as set out within the draft Local Strategy, with 48% strongly agreeing. 12% of respondents disagreed with this action and 9% of respondents neither agreed nor disagreed.

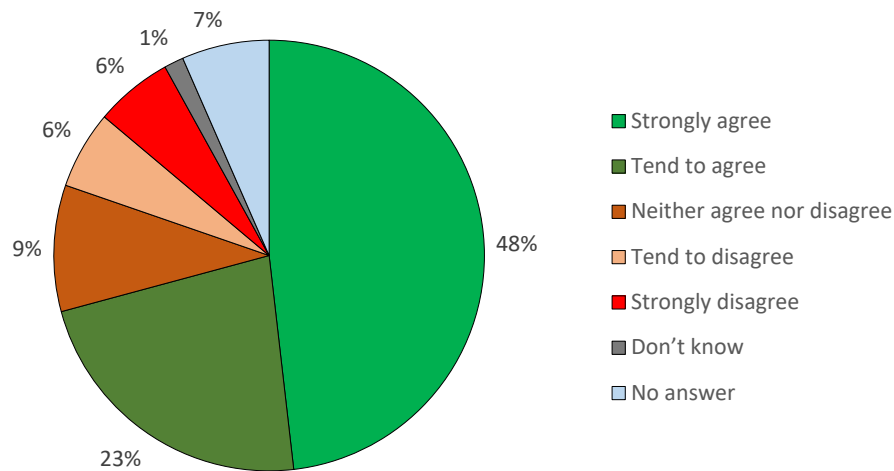


Figure 20: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... continue to encourage and support planning applications to appropriately consider the delivery of Sustainable Drainage Systems and reduce flood risk where possible.'

Figure 21 shows the percentage of responses to this question. 63% of 137 respondents agreed to achieve Objective 3 'we will implement Schedule 3 of the Flood and Water Management Act 2010', as set out within the draft Local Strategy, with 42% strongly agreeing. 8% of respondents disagreed with this action and 16% of respondents neither agreed nor disagreed.

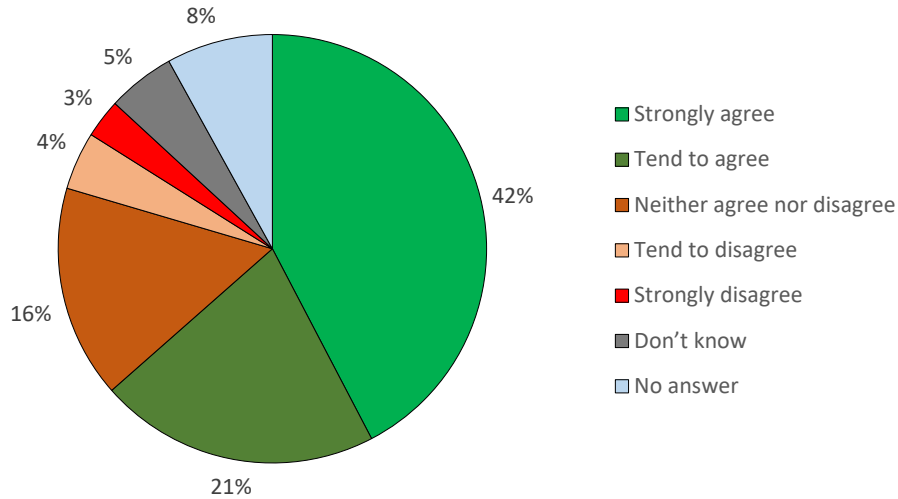


Figure 21: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... implement Schedule 3 of the Flood and Water Management Act 2010.'

Figure 22 shows the percentage of responses to this question. 73% of 137 respondents agreed to achieve Objective 3 'we will work with local planning authorities to ensure local flood risk is considered in local plan making and opportunities to proactively reduce flood risk are included', as set out within the draft Local Strategy, with 56% strongly agreeing. 12% of respondents disagreed with this action and 7% of respondents neither agreed nor disagreed.

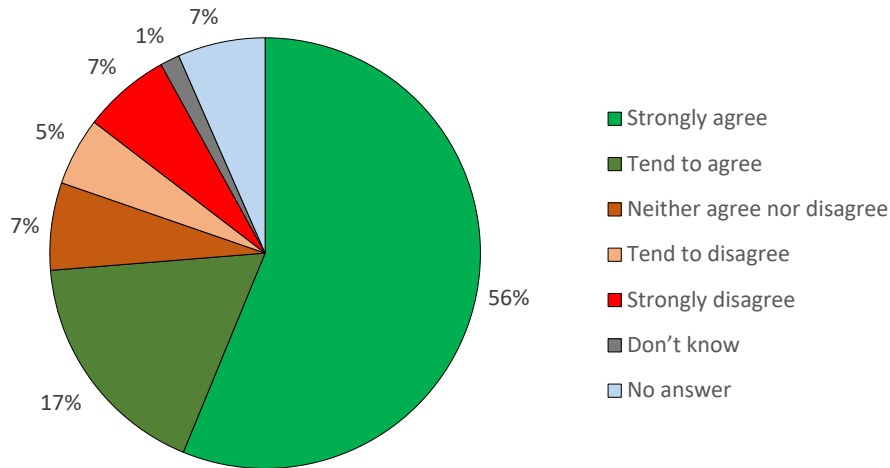


Figure 22: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... work with local planning authorities to ensure local flood risk is considered in local plan making and opportunities to proactively reduce flood risk are included.'

4.4.3 To what extent do you agree or disagree with how we will measure the activities we will undertake to achieve the delivery of Objective 3?

Figure 23 shows the percentage of responses to the consultation questionnaire. 62% of respondents agree with how we propose to measure the activities we will

undertake to achieve the delivery of Objective 3, as set out within the draft Local Strategy, with 31% strongly agreeing. 14% of respondents disagreed, with 7% strongly disagreeing and 17% neither agreeing nor disagreeing. The sum of individual percentages may not sum to 100% due to rounding.

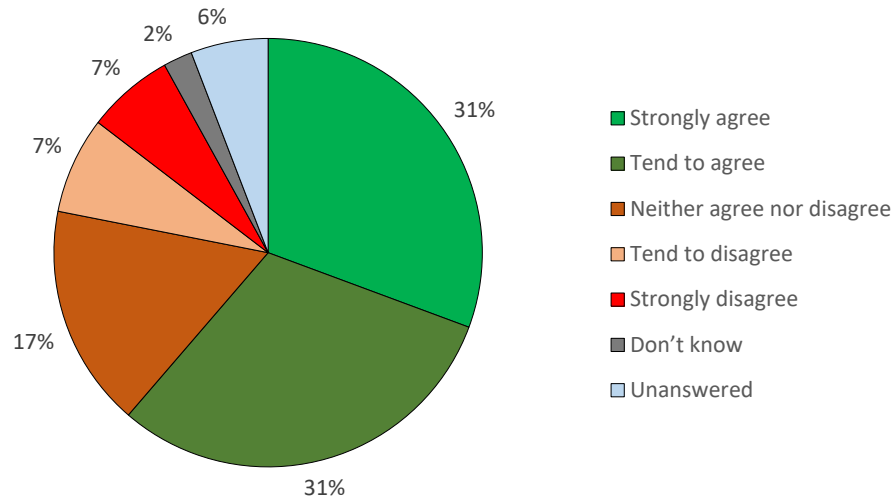


Figure 23: Pie chart to show responses to: To what extent do you agree or disagree with how we will measure the activities we will undertake to achieve the delivery of Objective 3?

4.4.4 Objective 3 comments

Respondents were given the opportunity to provide a reason for their response to this question. The responses provided cover a range of themes, these are shown in Table 11. Some responses contained more than one theme.

Table 11: Emerging themes for comments regarding 'If you would like to provide comments on Objective 3, including any of the actions and/or activities we will undertake to achieve this objective, please tell us... If you have any suggestions on other actions, activities or metrics you would like us to report on annually, please include these in your answer.'

Themes	Number of comments	Percentage
Misunderstanding/clarity	9	6%
Out of scope	33	23%
Highways drainage	2	1%
Land drainage	7	5%
Powers (water companies)	1	1%
Powers (other)	3	2%
Powers (development, planning)	8	6%
Planning	31	22%
Community resilience	1	1%
Actions/metrics/review/data	15	10%
Location specific	14	10%
General/positive comments	20	14%

Two key themes emerged from the responses regarding Objective 3, 23% of comments are within the theme of concerns that are out of scope of the Local Strategy and 22% were regarding planning.

Many of the comments suggested that the planning process should consider flood risk and require developments to account for flooding in the way that it currently does.

“stop building on flood plain land”

“This needs to be a rigorous and robust process that gives full weight to flood management.”

The [National Planning Policy Framework](#) requires new developments to consider flood risk and avoid floodplains. There are exceptions, for instance critical infrastructure or regeneration where existing settlements are currently in the flooding plain. However, national planning guidance requires developers to mitigate any increase in flood risk.

Some of the respondent comments asked KCC to implement measures that are beyond our power to deliver or are not achievable within national planning guidance.

“Make developers accountable if new developments continue to have on going flooding issues”

“Reduce the amount of housing development until infrastructure is in place.”

“Relating to “continue to encourage and support planning applications to “appropriately consider the delivery of Sustainable Drainage Systems and reduce flood risk where possible” – it is considered that this should be more robustly worded so that this is an expectation rather than something to be merely encouraged/supported”

“You need to do more than just consider these things, you need to enforce proper adoption and sustainable development”

As a statutory consultee in the planning process, not the planning authority, there are limits on what we can achieve in planning. We are reliant on being consulted, and reliant on the planning authority implementing our recommendations in the planning approval (should there be one). The planning authority then has the powers to enforce any recommendations if they are not actioned by the developer. We are not in a position to impose any expectations within the current planning regime.

Some comments ask us to go further than planning guidance currently allows, though many of these suggestions would be achieved with the implementation of Schedule 3 of the Flood and Water Management Act.

“Planning application responses by KCC to Kent’s planning authorities need to be more robust to ensure that the Suds last for

the lifetime of the development, i.e. 100 years – and Suds need monitoring/visits/to regulate and review.”

“Pressure for a change in the requirements for minor planning developments to have a flood risk assessment especially in areas of high risk”

If Schedule 3 is implemented as it has been drafted, we will be able to impose more expectations on developments and consider a broader range of developments, it will also give us powers of enforcement. However, within the current planning guidance, measures like this are not possible.

14% of the comments were general/positive comments, for example:

“Again, communication between various KCC departments is critical”

“It is important that planning authorities understand flood management.”

4.4.5 You said, we did:

To provide more detail about Schedule 3 we have added appropriate links, including links to [Schedule 3 of the Flood and Water Management Act 2010](#). We have also added a link to our KCC [Sustainable drainage in planning](#) webpage, where sustainable drainage and our role in planning is explained further. We will improve this page to help explain our role and that of other risk management authorities in the planning process.

We have considered targets for this objective; however, our role is dependent on the developments we are consulted on, and on other parties implementing what we recommend; achieving any targets set would be out of our control at present. We also lack a baseline for some measures. We will review the metrics annually and determine whether targets are appropriate, similarly if Schedule 3 is implemented we will consider targets for the delivery of the new role.

4.5 Objective 4

4.5.1 To what extent do you agree or disagree with Objective 4 as set out in the draft Local Strategy?

Figure 24 shows the percentages of responses to the consultation questionnaire. 69% of 137 respondents indicated they agree with Objective 4 as set out in the Local Strategy, with 42% strongly agreeing. 13% of respondents indicated they disagree with Objective 4; with 11% neither agreeing nor disagreeing. The sum of individual percentages may not sum to 100% due to rounding.

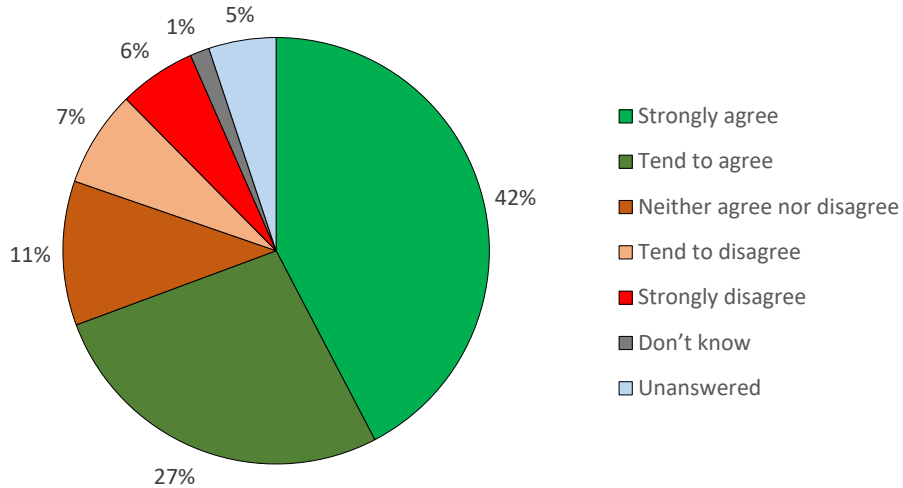


Figure 24: Pie chart to show responses to: To what extent do you agree or disagree with Objective 4 as set out in the draft Local Strategy?

4.5.2 To what extent do you agree or disagree with the actions set out in the 'To achieve this we will...' section for Objective 4?

Over 60% of 137 respondents agreed with each of the actions conveyed to achieve Objective 4. Figures 25 to 28 show the percentages of responses to the consultation questionnaire regarding each action set out to achieve Objective 4. The sum of individual percentages may not sum to 100% due to rounding.

Figure 25 shows the percentage of responses to this question. 73% of 137 respondents agreed to achieve Objective 4 'we will improve communities' access to appropriate data and information to understand flood risk in their area', as set out within the draft Local Strategy, with 54% strongly agreeing. 7% of respondents disagreed with this action and 12% of respondents neither agreed nor disagreed.

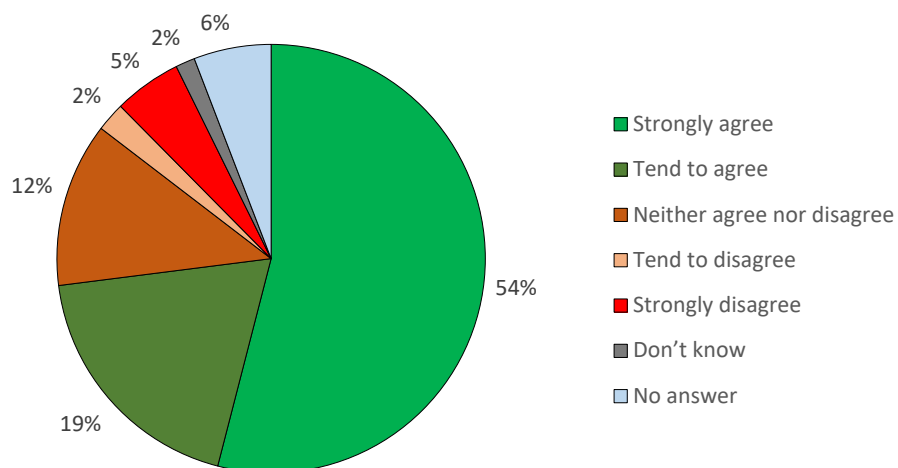


Figure 25: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... improve communities' access to appropriate data and information to understand flood risk in their area.'

Figure 26 shows the percentage of responses to this question. 71% of 137 respondents agreed to achieve Objective 4 'we will support communities to establish and maintain Flood Action Groups', as set out within the draft Local Strategy, with 42% strongly agreeing. 9% of respondents disagreed with this action and 13% of respondents neither agreed nor disagreed.

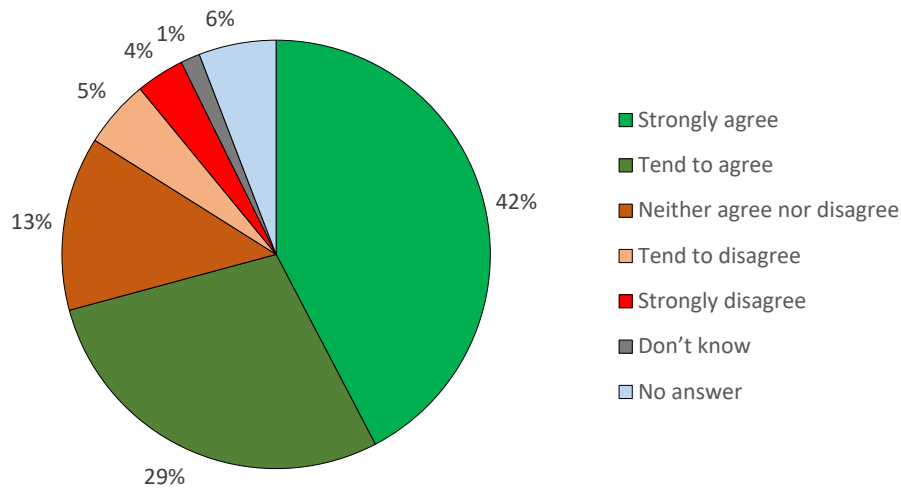


Figure 26: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... support communities to establish and maintain Flood Action Groups.'

Figure 27 shows the percentage of responses to this question. 68% of 137 respondents agreed to achieve Objective 4 'we will continue to promote the voluntary role of flood warden within flood risk communities, in partnership with the Environment Agency', as set out within the draft Local Strategy, with 39% strongly agreeing. 8% of respondents disagreed with this action and 16% of respondents neither agreed nor disagreed.

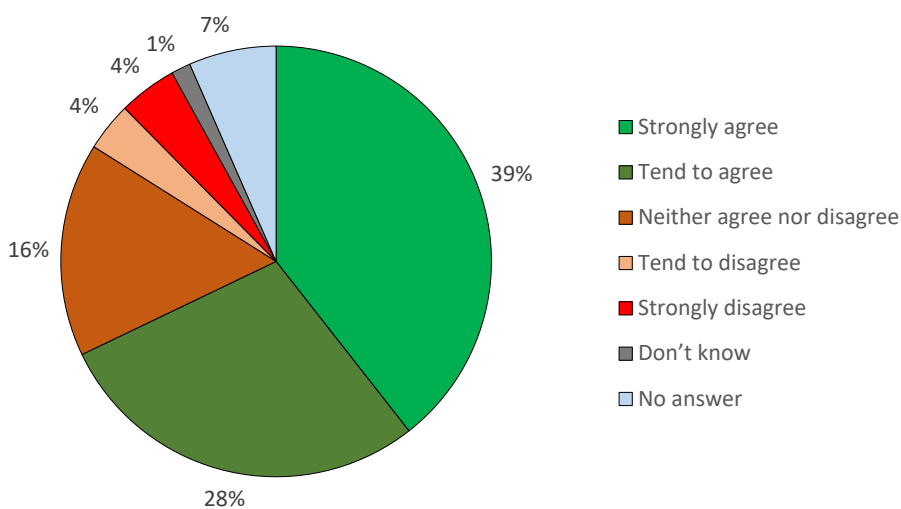


Figure 27: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... continue to promote the

voluntary role of flood warden within flood risk communities, in partnership with the Environment Agency.'

Figure 28 shows the percentage of responses to this question. 68% of 137 respondents agreed to achieve Objective 4 'we will encourage communities to prepare local flood plans', as set out within the draft Local Strategy, with 39% strongly agreeing. 9% of respondents disagreed with this action and 15% of respondents neither agreed nor disagreed.

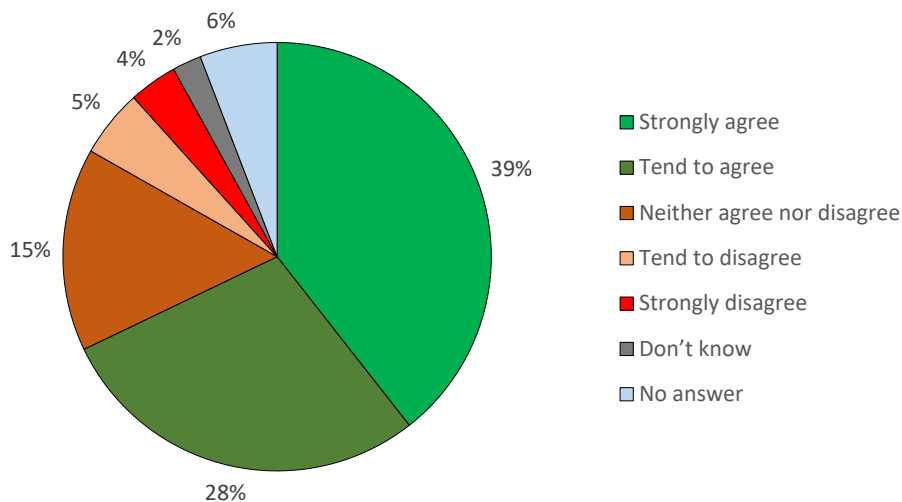


Figure 28: Pie chart to show responses to: To what extent do you agree or disagree with the actions set out in the 'To achieve this we will... encourage communities to prepare local flood plans.'

4.5.3 To what extent do you agree or disagree with how we will measure the activities we will undertake to achieve the delivery of Objective 4?

Figure 29 shows the percentage of responses to this question. 62% of respondents agree with how we propose to measure the activities we will undertake to achieve the delivery of Objective 4, as set out within the draft Local Strategy, with 28% strongly agreeing. 6% of respondents disagree with how we propose to measure the activities that we will undertake to achieve the delivery of Objective 4, with 2% strongly disagreeing. 22% neither agreed nor disagreed. The sum of individual percentages may not sum to 100% due to rounding.

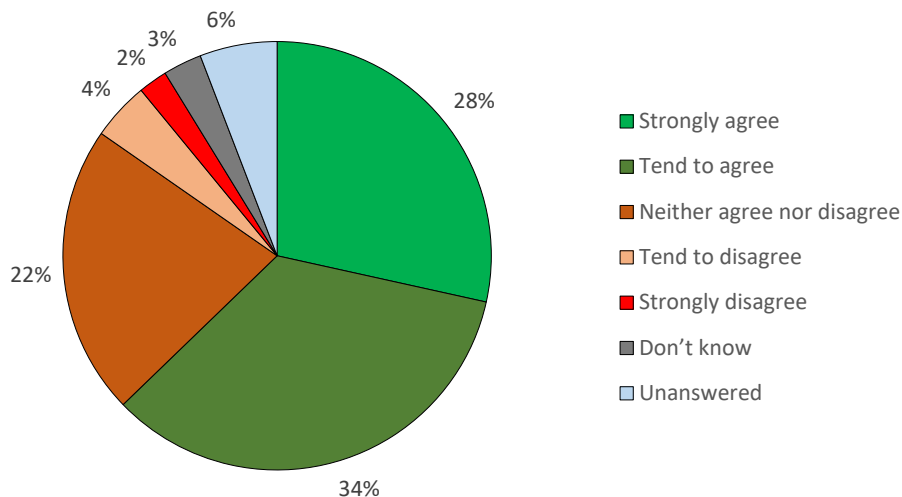


Figure 29: Pie chart to show responses to: To what extent do you agree or disagree with how we will measure the activities we will undertake to achieve the delivery of Objective 4?

4.5.4 Objective 4 comments

Respondents were given the opportunity to provide a reason for their response to this question. The responses provided cover a range of themes, these are shown in Table 12. Some responses contained more than one theme.

Table 12: Emerging themes for comments regarding 'If you would like to provide comments on Objective 4 including any of the actions and/or activities we will undertake to achieve this objective, please tell us... If you have any suggestions on other actions, activities or metrics you would like us to report on annually, please include these in your answer.'

Themes	Number of comments	Percentage
Misunderstanding/clarity	23	19%
Out of scope	15	12%
Highways drainage	2	2%
Land drainage	2	2%
Powers (water companies)	1	1%
Powers (other)	1	1%
Powers (development, planning)	0	0%
Planning	2	2%
Community resilience	32	26%
Actions/metrics/review/data	16	13%
Location specific	7	6%
General/positive comments	23	19%

The key themes that emerged from the comments is based upon community resilience with 26% of comments expanding on the question asked and 19% are within the theme of a misunderstanding or lack of clarity in the draft Local Strategy. Some comments on Objective 4 indicted concern that promoting community flood

plans and flood wardens was a way for flood risk management authorities to abrogate their responsibility for responding to a flood event.

“Given the seriousness of flooding in this area - should we be relying on voluntary wardens only?”

Community flood plans are a key tool that support local communities in a flood event, they are usually a simple guide that lets local communities know who to speak to in the event of a flood, and which authorities will help them. They are not a way to pass responsibilities on to local communities. A good flood plan will help a local community manage more effectively in a flood. Similarly, Flood Wardens have a key role to support local communities in the event of a flood. Flood Wardens warn and support vulnerable residents, which risk management authorities have never had the resources to do, particularly in large scale floods.

Other comments showed that readers were concerned about the need for Flood Wardens and how they would be trained and retained.

“More effort on maintaining wardens will be needed.”

“Will competent, capable volunteers come forward in the volumes needed?”

Several comments were concerned about the availability and quality of flood risk data.

“More readily available flood data and information for the public would be helpful.”

“It is essential that local residents have quick and free access to maps of local infrastructure relative to flooding issues.”

Other comments requested more engagement with communities when delivering flood risk management services.

“should you be looking to work more closely with local communities”

“All action to be taken on the flood risks in each area must be carried out with consultation with the local community”

Some comments felt that the metrics needed more data so that they could be understood in context. For instance, the number of flood wardens should be placed in the context of how many areas the risk management authorities considered a need for flood wardens. Similarly, the number of homes signed up for flood warnings needed to be understood in the context of how many homes were eligible for flood warnings.

“Metrics should probably start with Number of flood areas requiring action and nominated 'Wardens'. No of wardens required; locations without wardens or community groups.”

“You probably need a metric for communities around risk likelihood and risk impact if it occurs.”

19% of the comments were general/positive comments, for example:

“I think this has been well thought out and I welcome more information and flood wardens as this risk increases.”

“This is where technology needs to take over humans. Even community volunteers can be costly at some stage. Also maybe AI would have a place in monitoring such tech to provide prediction abilities.”

4.5.5 You said, we did:

We have updated the text under 4.1.4 Objective 4: Resilient communities so that it is clearer that flood plans and flood wardens play a vital role in helping manage flood risk and they are not used as an alternative to the roles that risk management authorities. We have updated the Local Strategy to include more information on the roles and responsibilities of flood wardens and flood plans and provided links to the Kent Prepared website with more information. Through the Local Strategy we hope to support this role and improve the uptake of flood wardens and flood plans.

We have also added to the metrics under Objective 1 and 4 to show that we are committed to working alongside communities when we undertake studies, investigations and projects in their area.

We have also added a measure to work with local community representatives, such as KALC and the Kent Flood Risk Action Forum, to understand what data and information they would like about flood risk and how we can help them access it.

We have added metrics to help put the uptake of flood plans and flood wardens in context of flood risk. To do this, we have added the number of priority flood areas, as well as, the number of priority flood areas with flood wardens, and with flood plans.

4.6 Consultation responses concerning the challenges to delivering local flood risk management in Kent

4.6.1 To what extent do you agree or disagree that the draft Local Strategy has identified the right challenges to delivering local flood risk management in Kent?

Figure 30 shows the percentages of responses to the consultation questionnaire. 65% of 137 respondents indicated they agree that the draft Local Strategy has identified the right challenges, with 24% of respondents strongly agreeing. 14% of respondents indicated that they disagree, with 5% strongly disagreeing. With, 15% of respondents neither agreeing nor disagreeing.

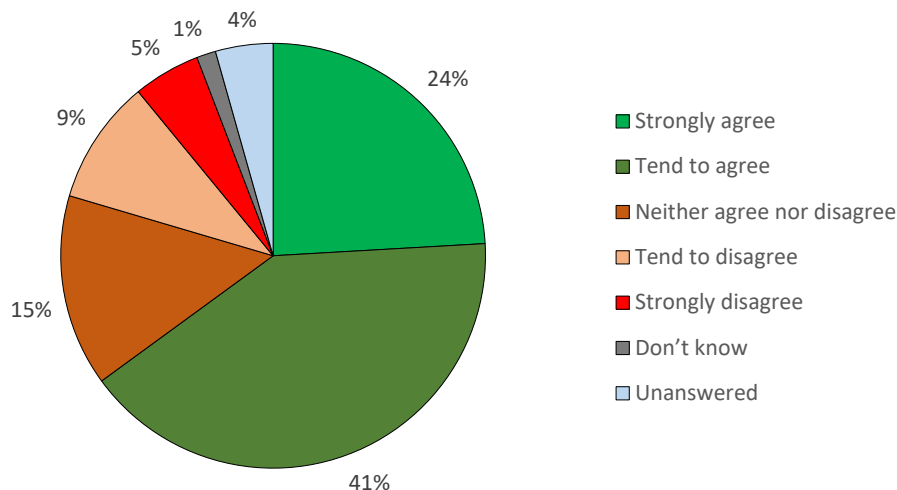


Figure 30: Pie chart to show responses to: To what extent do you agree or disagree that the draft Local Strategy has identified the right challenges to delivering local flood risk management in Kent?

4.6.2 Challenges comments

Comments on the challenges, shown in Table 13, generally reflect the comments throughout the responses we received. There were a large number that commented on flood risk in planning (responded to under Objective 3), many that commented on the maintenance of highway drainage and watercourses, (responded to under Objective 2), and a number of comments about water companies, (responded to under Objectives 1 and 2).

Table 13: Emerging themes for comments regarding challenges in delivering the Local Strategy

Themes	Number of comments	Percentage
Misunderstanding/clarity	34	22%
Out of scope	27	18%
Highways drainage	6	4%
Land drainage	9	6%
Powers (water companies)	2	1%
Powers (other)	3	2%
Powers (development, planning)	3	2%
Planning	17	11%
Community resilience	4	3%
Actions/metrics/review/data	11	7%
Location specific	17	11%
General/positive comments	19	13%

Some responses contained more than one theme. The two key themes that emerged from the comments were misunderstanding or lack of clarity in the strategy (22%), and 18% related to comments that are out of the scope of the Local Strategy. Some of the comments noted that the challenges have not necessarily been carried through into the objectives.

“Not all the challenges are carried through into the action plan and measures.”

This is because some of the challenges, particularly on resources and funding, were outside of the scope of the Local Strategy, and many were outside the scope of KCC to influence directly.

“Have you got an apprenticeship programme to train people for the vacant posts?”

“Perhaps no great progress until Central Government can devote additional funds”

These challenges are included in the Local Strategy to highlight the difficulties in delivering it, but managing some challenges is outside the scope of the Local Strategy. Whilst KCC has views on these challenges, our voice alone does not carry much weight and we do not have the resources to develop new training and apprenticeship standards ourselves, for instance. We are part of a national network of Lead Local Flood Authorities, through these we work with the Environment Agency and the government to discuss new and revised policies, guidance, funding, training and other aspects of managing local flood risks. Changes in these areas take time as there are many competing objectives at a national level.

13% of the comments were general/positive comments for example:

“The strategy is admirably clear. The link to climate change is well-founded.”

4.6.3 You said, we did:

We have updated the text within the Challenges section of the Local Strategy to clarify that the challenges we have identified include challenges to the delivery of the Local Strategy as well as challenges that are not within the scope of the Local Strategy to manage (such as funding and staff resources).

5 General comments

At the end of the consultation questionnaire, respondents were invited ‘to make any other comments about the draft Local Strategy, including any other information, details or links that you feel should be included’. There were 47 responses, some responses contained more than one theme, these are shown in Table 14.

Table 14: Emerging themes for general comments

Themes	Number of comments	Percentage
Misunderstanding/clarity	25	28%
Out of scope	6	7%
Highways drainage	4	4%
Land drainage	2	2%
Powers (water companies)	3	3%
Powers (other)	3	3%

Themes	Number of comments	Percentage
Powers (development, planning)	0	0%
Planning	8	9%
Community resilience	3	3%
Actions/metrics/review/data	6	7%
Location specific	13	14%
General/positive comments	17	19%

The key emerging theme had 28% of comments regarding a misunderstanding or lack of clarity in the strategy.

“I have no idea from this whether there is any risk in the area where I live”

19% of responses were general/positive comments for example:

“We like the fact that the strategy summarises progress since the previous strategy and what it intends to do next”

“The proposed content is considered appropriate and proportionate to the strategy’s remit”

5.1.1 You said, we did:

We have added links to resources that provide more details about flood risks.

6 Email responses

There was an opportunity for open comments via email, we received 11 responses via email. The email responses cover a range of themes, these are shown in Table 15. These comments have been dealt with in the appropriate section.

Table 15: Emerging themes for comments in email responses

Themes	Number of comments	Percentage
Misunderstanding/clarity	4	11%
Out of scope	7	19%
Highways drainage	1	3%
Land drainage	1	3%
Powers (water companies)	3	8%
Powers (other)	3	8%
Powers (development, planning)	1	3%
Planning	2	6%
Community resilience	1	3%
Actions/metrics/review/data	3	8%
Location specific	3	8%
General/positive comments	7	19%

The key theme regards concerns that are out of scope for the Local Strategy, with 19% of responses within this theme. Some responses contained more than one theme.

“greater clarification of what resilience will be created for flood issues associated with the potential of further development of housing, particularly where communities are reliant on historic combined drainage systems”

19% of responses were general/positive comments, for example:

“The strategy sets out clear direction and outlines the strategic intent and deliverables for the next 10 years”

“We are happy with the contents of the draft document.”

7 Equality Impact Assessment

An EqlA is a tool to assess the impact any proposals would have on the protected characteristics: age, disability, sex, gender identity, sexual orientation, race, religion or belief, and carer’s responsibilities.

As part of the consultation, we published our results of the EqlA for the draft Local Strategy. This can be found on our consultation page on [Let’s talk Kent](#).

Our assessment found that some small positive impacts could arise for some protected groups as a result of the emerging Local Strategy (2024 – 2034). The protected groups that may experience the small positive impacts were found to be age, disability and pregnancy/maternity. We felt the Local Strategy would have a small positive impact on these groups due to setting out our actions to achieving its objectives – ‘to better understand flood risk in Kent’, ‘reduce the risk of flooding in Kent’, ‘increase resilient planning’ and ‘help communities to become more flood resilient’.

Alongside the small positive impacts, the EqlA found there could also be some negative impacts felt by specific protected characteristics. After identifying the possible negative impacts, we found ways to best mitigate them.

For example, the negative impact on protected groups; age, disability, and race, could be an individual’s ability to read an online English version of the consultation documents. To mitigate this negative impact, we ensured the following were true:

- Using alternative text (Alt Text) to describe any images within the consultation documents so that a page reader (text-to-speech) could read the description aloud;
- A point of contact to verbally discuss the consultation documents;
- Printed copies of consultation documents to be available on request;
- Large print copies of the documents to be available on request;
- Available option for the consultation website that the documents are published on to be read by an automated voice, and;
- All consultation documents are available in different languages on request.

Responding to questions about the EqIA was not compulsory. We received 31 responses to the EqIA questions from the 137 questionnaire responses, none of the email responses mentioned the EqIA.

We asked for respondents views on our equality analysis and if individuals felt there is anything we should consider relating to equality and diversity within the consultation questionnaire. This was provided as a free text answer, so that the opinions of individuals could be freely expressed.

When reviewing the responses it was found that there were no appropriate comments that indicated we should amend the EqIA. Therefore, no changes have been made to the EqIA for the Local Strategy based on the responses to this section of the consultation.

8 Amendments to the Local Strategy 2024-2034

The consultation has been useful to identify shortcomings in the Local Strategy. Following on from the responses, amendments have been made to the Local Strategy, these are listed in Table 16.

Table 16: Summary of the amendments made to the Local Strategy 2024-2034.

Amendment description	Brief explanation
Removal of asset register information	Inappropriate for a strategy document
Addition of links	Provides further detail to reduce common miscommunication/misconceptions
Clarified text within Objective 1	Comments indicated a misunderstanding of Objective 1 therefore it was reworded for clarification.
Addition of a target to receive comments from local communities on Section 19's before publishing	A target was required to improve engagement with the local community regarding Section 19 reports.
Addition of a target for better protected properties and disconnection from foul/combined sewers, due to delivered projects	A target was required to measure the effectiveness of Objective 2.
Addition of further information regarding flood wardens	Comments indicted a misunderstanding of the role of flood wardens.
Clarified text in the Challenges section of the Local Strategy	Challenges that are out of scope, of the those that can be managed by the Local Strategy, have been amended for clarity.
Additional data collected within the land drainage reporting table	Shows the betterment to land drainage consents due to advice given.

Amendment description	Brief explanation
Additional metrics regarding flood wardens and flood plans	Metrics will be reported on to show where flood wardens and flood plans are still required across Kent.

9 Conclusions and Next Steps

The Local Strategy was generally supported by the respondents to the consultation, with 56% of respondents indicating that they agreed or strongly agreed with the Local Strategy. The other questions also received majority support from the respondents that provided a response.

The feedback we received have been helpful in amending the Local Strategy. The consultation also highlighted that the Local Strategy needed more robust metrics and targets to make clear how the monitoring demonstrated the delivery of the Local Strategy. We have revised the metrics and introduced targets to show how the Local Strategy is being delivered.

The consultation showed that some areas of the Local Strategy were not clear. We have clarified the role of voluntary groups within Kent, such as Flood Wardens and Flood Action Groups. We have amended the Local Strategy to include links to additional information on voluntary roles related to flooding in the community. We have also included links to further information around planning to aid understanding, as the scope of our role was not fully communicated.

This report, alongside the final version of the Local Strategy 2024-2034, will be presented to the Environment and Transport Cabinet Committee on 9 July 2024.

Each year we will produce an Annual Review to report on our progress to achieving the metrics, activities and targets described within the Appendix of the Local Strategy. This will be published on [Kent.gov.uk](https://www.kent.gov.uk).

Appendix 1

Table 17 shows the themes that arose from the free text comments of both the questionnaire and email responses. The table has an explanation for each theme to provide an insight on how comments were categorised. A free text response may cross over more than one theme.

These themes were used to determine what the biggest public pressures were for possible amendments to the draft Local Strategy.

Table 17: Themes from free text comments along with an explanation as to what comments would fit within that theme.

Themes	Explanation
Misunderstanding/clarity	Comments from respondents that have misunderstood the Local Strategy, possibly due to a lack of clarity within the report.
Out of scope	Comments from respondents that have understood the Local Strategy but feel we should achieve or add something outside of KCC/LLFA scope.
Highways drainage	Comments that specifically mention or refer to highways drainage.
Land drainage	Comments that specifically mention or refer to land drainage.
Powers (water companies)	Comments that assume we have powers to influence decisions or outcomes, regarding water companies.
Powers (other)	Comments that assume we have powers to influence decisions or outcomes, for example other Local Authorities.
Powers (development, planning)	Comments that assume we have powers to influence decisions or outcomes, regarding development and planning.
Planning	Comments towards planning applications and/or the planning system.
Community resilience	Comments that discuss flood wardens, volunteer groups, flood action plans, and/or similar community engagement or resilience practices.

Themes	Explanation
Actions/metrics/review/data/review/data	Comments discussing the actions and metrics within the Appendix of the draft Local Strategy 2024-2034.
Location specific	Comments that reference a specific location, such as Minster Marshes.
General/positive comments	Statements, comments unrelated to a specific part of the Strategy, supporting comments.

Any comments that we felt were out of scope for the Local Strategy and/or out of scope for KCC powers were omitted from this document; that included comments that were very specific to a location as the Local Strategy focuses on Kent as a whole. Our Flood Risk to Communities documents provide detailed information for each of the 12 boroughs within Kent, which may be of benefit to those who responded with comments specific to a location.