

# Kent Local Flood Risk Management Strategy Consultation Report

November 2017

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## 1. Introduction

Kent County Council (KCC) is the Lead Local Flood Authority (LLFA) for Kent with a role to oversee local flooding, which is flooding from surface water, groundwater and ordinary watercourses. As LLFA, KCC must prepare a Local Flood Risk Management Strategy (Local Strategy) as a requirement of the Flood and Water Management Act 2010 (the Act). The Local Strategy that sets out how local flood risks will be managed in the county, who will deliver them and how they will be funded.

KCC adopted a Local Flood Risk Management Strategy in 2013, which can be found here: [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0016/12076/Kent-Local-Flood-Risk-Management-Strategy-Report.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0016/12076/Kent-Local-Flood-Risk-Management-Strategy-Report.pdf). This Local Strategy now needs to be replaced and KCC has drafted a new version, which it has consulted on.

The new Local Strategy will be adopted by KCC after the appearing before the Environment and Transportation Cabinet Committee. This consultation will inform the final draft of the Local Strategy. .

## 2. Consultation process

The consultation on the new Local Strategy started on 16 August and ran until 8 October 2017.

6,445 members of the public who have registered on the Consultation Directory and requested to be kept informed of consultation relating to General interest and Environment and countryside were invited to take part in the consultation.

The Flood and Water Management team works closely with community groups and parish councils. The consultation was sent to Kent Association of Local Councils (KALC) and directly to stakeholders such as communities and parishes, the districts and boroughs of Kent, the water companies, the Environment Agency and the Internal Drainage Boards.

The consultation was also tweeted three times from the Kent County Council Twitter account during the consultation period:

<b>Date</b>	<b>Content</b>
17/08/2017	Have your say on our Local Flood Risk Management Strategy public consultation running until 8th October: <a href="http://bit.ly/2x3RRQ9">http://bit.ly/2x3RRQ9</a>
20/09/2017	Take part in our Local Flood Risk Management Strategy consultation by 8th October: <a href="http://bit.ly/2x3RRQ9">http://bit.ly/2x3RRQ9</a>
02/10/2017	Last chance - tell us your views on the Local Flood Risk Management Strategy consultation before 8th October: <a href="http://bit.ly/2i5sSsV">http://bit.ly/2i5sSsV</a>

A [Press Release](#) was issued on September 26 2017.

The consultation was also promoted to KCC staff via newsletters and building information screens.

The consultation asked eight questions about the draft Local Strategy, each with an option to provide more details about the response. There were also questions about whether the Equality Impact Assessment (EqIA) was appropriate and questions that gathered the respondents' equalities information.

All consultation documents were available online at [www.kent.gov.uk/localfloodrisk](http://www.kent.gov.uk/localfloodrisk) and hard copies were available upon request.

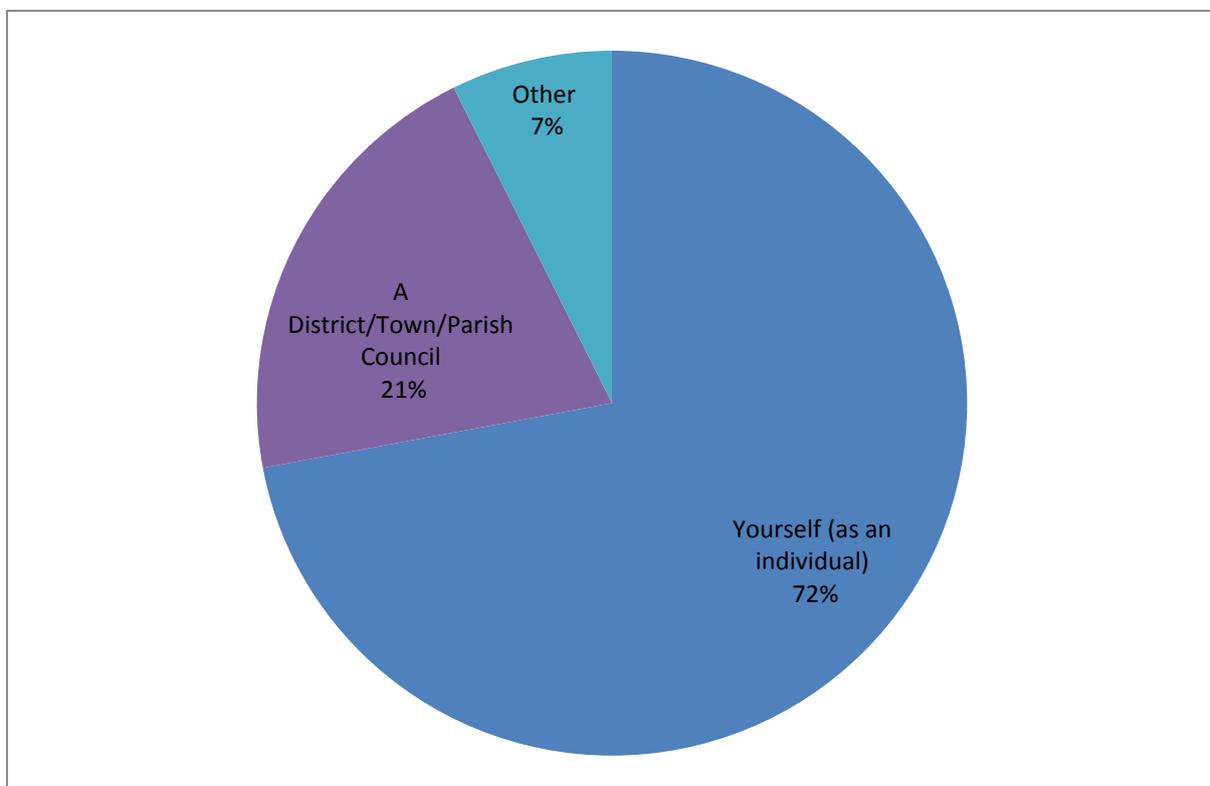
The following table summarises the frequency that documents were downloaded from the consultation directory: [www.kent.gov.uk/localfloodrisk](http://www.kent.gov.uk/localfloodrisk)

<b>Documents</b>	<b>Downloads</b>
Kent Local Strategy 2017-23 draft (PDF version)	479 downloads
Kent Local Strategy 2017-23 draft (Word)	66 downloads

version)	
Local Flood Risk Management Strategy 2017-2023 draft EqIA	69 downloads
Local Flood Risk Management Strategy questionnaire (Word version)	79 downloads
Kent County Council Preliminary Flood Risk Assessment	78 downloads

### 3. Respondents

We received 68 responses to the consultation questionnaire. A breakdown of the responders is shown in Figure 1.



**Figure 1 Breakdown of responders**

Of these, 49 were from individuals, 14 were from parish councils and five were other bodies, representing professional partners and non-governmental organisations.

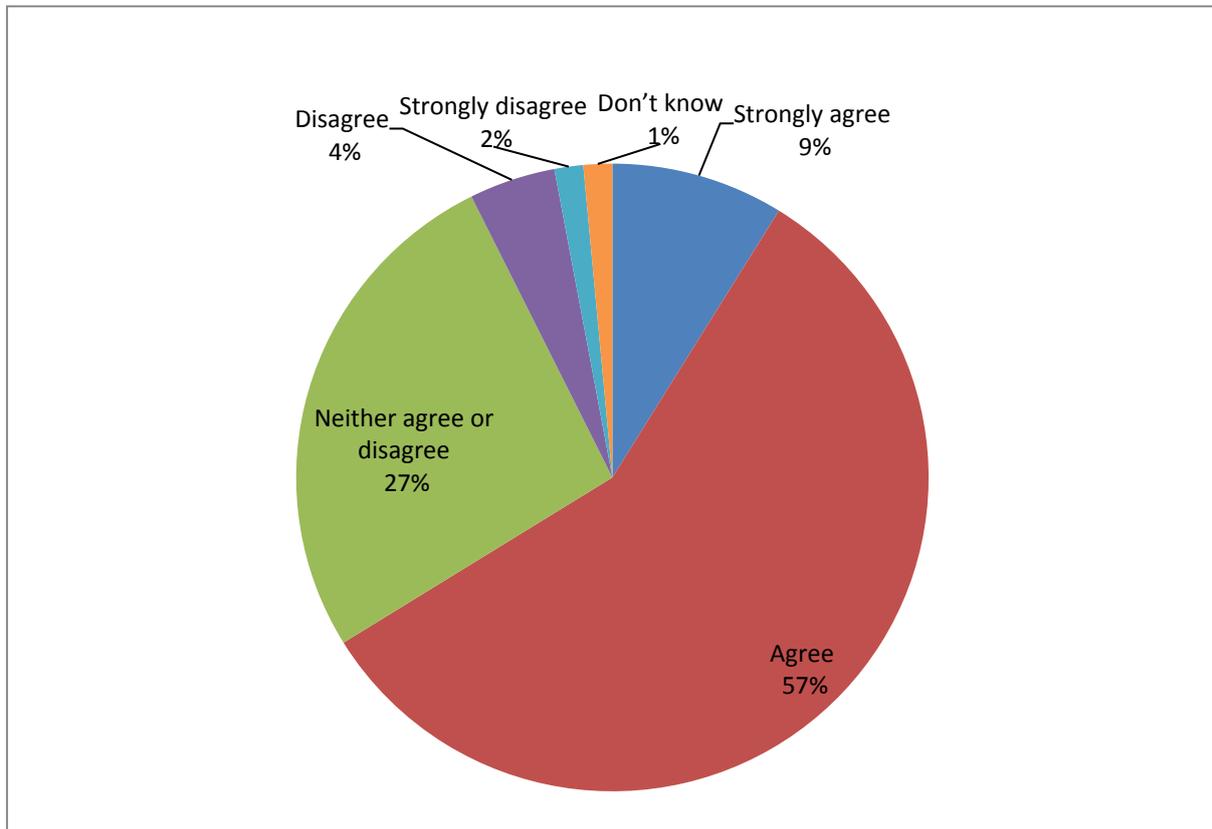
### 4. Consultation responses

Below is an analysis of the questions on the Local Strategy and a summary of the free text responses we received.

Question 1 asked the respondents what capacity they were responding in, which is addressed in Section 3.

**Question 2. To what extent do you agree or disagree that the Kent Local Flood Risk Management Strategy 2017-2023 (Local Strategy) clearly sets out a strategy for Local Flood Risk Management in Kent?**

This question was responded to by every respondent, 68 in total. A breakdown of their responses is given in Figure 2.



**Figure 2 Breakdown of question 2 responses**

Respondents generally agreed that the Local Strategy clearly sets out a strategy for Local Flood Risk Management in Kent, with 66% agreeing or strongly agreeing with this statement. 26% of respondents answered that they neither agree or disagree and 2% that they don't know. 6% selected disagree or strongly disagree.

Generally there is support for the Local Strategy, however there are a number of comments that provide more insight to the respondents thoughts. The quotes below are examples of the responses:

A well presented and detailed document. The graphics are particularly good and useful.

I don't think it is sufficiently focused.

Looking at the text responses to this question, where they have been provided, there are generally two themes to the responses that disagree. These are concerns about the impacts of planning and development on local flood risk and factors outside the specific remit of the Local Strategy, for instance the frequency of highway gully cleansing or fluvial flooding issues. The quotes below are examples of ones that suggest other areas are included in the Local Strategy:

Tighter controls regarding building on areas prone to flooding or flood plains.

KCC do not provide a programmed street gully cleansing rota, they seem to just chase complaints. In 1974, the schedule for gully cleansing was monthly on the main routes in Thanet and twice annually on all other roads and every two years in alleyways. KCC fail to even cleanse the gullies in my road once per annum.

#### **You said, we did:**

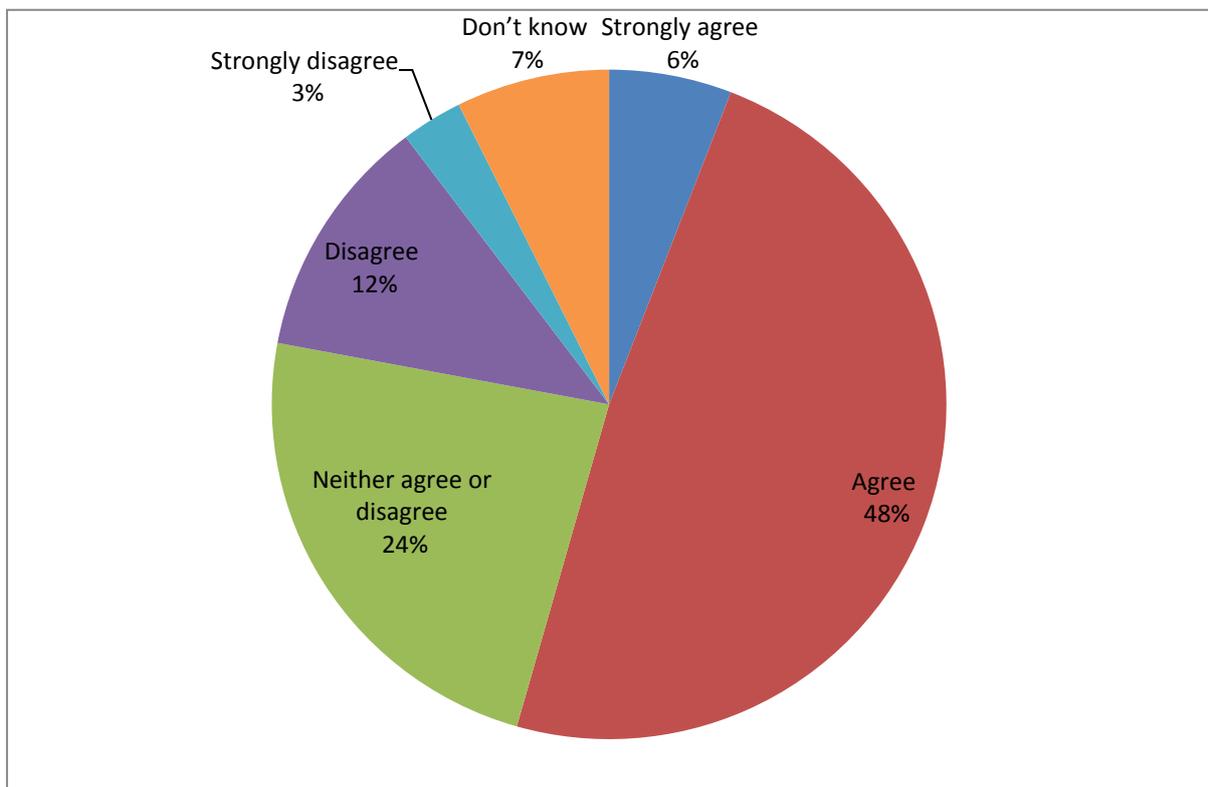
There is a need to provide more information on the scope of this Local Strategy and how it links to other strategies and policies on the management of flood risk in Kent. We will add an extra section to the final strategy to provide more contextual information on this line.

There is also a need highlight how flood risk is accounted for in new development applications and how the Local Strategy supports the management of local flooding through developments and planning. The actions and objectives that relate to flood risk and development will be enhanced and emphasised.

**Question 3. The Local Strategy sits alongside the Flood Risk to Communities documents. To what extent do you agree or disagree with presenting the information about flood risk in Kent in separate documents to the strategy for local flood risk management?**

This question was responded to by every respondent, 68 in total. A breakdown of their responses is given in Figure 3.

There is a mixed response to this question with 54% of respondents selecting that they agree or strongly agree with the approach of having the flood risk information presented separately. 15% of respondents disagreed or strongly disagreed. A further 24% responded that they neither agreed nor disagreed and 7% that they don't know.



**Figure 3 Breakdown of question 3 responses**

Below are some comments from respondents:

Makes sense otherwise there is simply too much to read. Easy enough to cross reference.

You need both documents to consider whether the strategy is correct and so they should be in the same document.

There is clearly a more mixed response to this method of presentation and we appreciate that it is not ideal. However, the large volume of information on flood risk management and the highly variable nature of flood risk in the county make it very hard to concisely present the information in one document.

**You said, we did:**

We have noted the comments on this style of presentation and will revise both sets of documents to ensure they are easier to read side by side and cross-reference. We will also improve the links to the Surface Water Management Plans as these provide a lot of the context for this Local Strategy.

**Question 4. Is there any other information, details or links that you feel should be included in the Local Strategy itself? Please give details:**

27 respondents out of 68 provided substantive responses to this question. They generally follow the same pattern as the responses to Question 2, focussing on the impacts of development on local flood risk or specific details of beyond the remit of the Local Strategy.

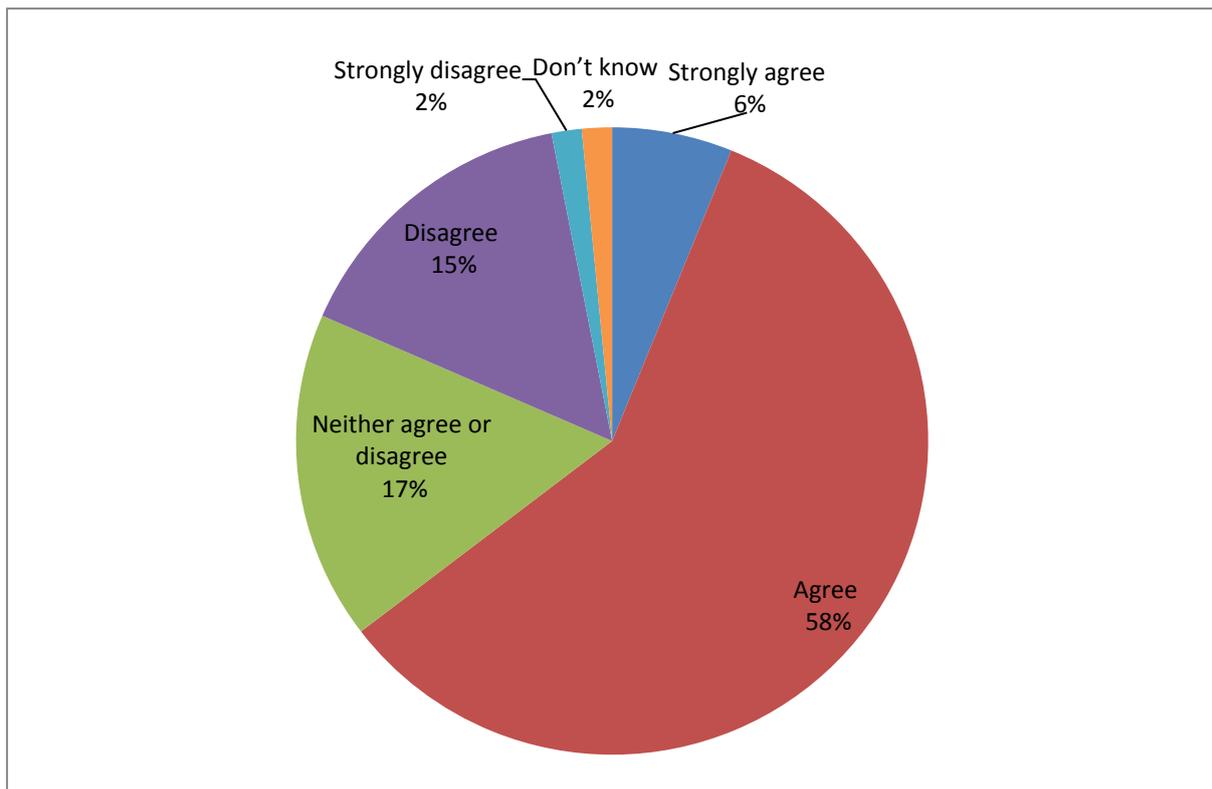
Other comments relate to information that is presented in the Flood Risk to Communities documents. There are other points that have been raised in this section, for instance the provision of a description and contact details for risk management authorities in Kent.

**You said, we did:**

We will address the points raised by Questions 2 and 3 and provide a description for risk management authorities in the Local Strategy and pointers to local contact details in the Flood Risk to Communities documents.

**Question 5. To what extent do you agree or disagree that the Local Strategy has identified the right challenges for delivering local flood risk management in Kent?**

This question was responded to by 65 of the 68 responders. A breakdown of their responses is given in Figure 4.



**Figure 4 Breakdown of question 5 responses**

64% of responders agree or strongly agree with this statement. 17% selected disagree or strongly disagree. 17% neither agree or disagree and 2% don't know.

The suggestions provided often presented objectives or actions rather than specific challenges and many of the comments focussed on highway drainage and the impact of new developments. Where challenges were presented by the responders they often overlapped with the existing challenges presented in the report, for instance a lack of funding was presented by one responder, which is included in challenge 9: Understanding the full economic benefits of flood risk management. Below are examples of comments from the responders:

Huge housing developments are surely going to exacerbate any flooding problems that exist now, and interfere with flood risk management.

Poor maintenance of drains (streets) - clearing and cleaning.

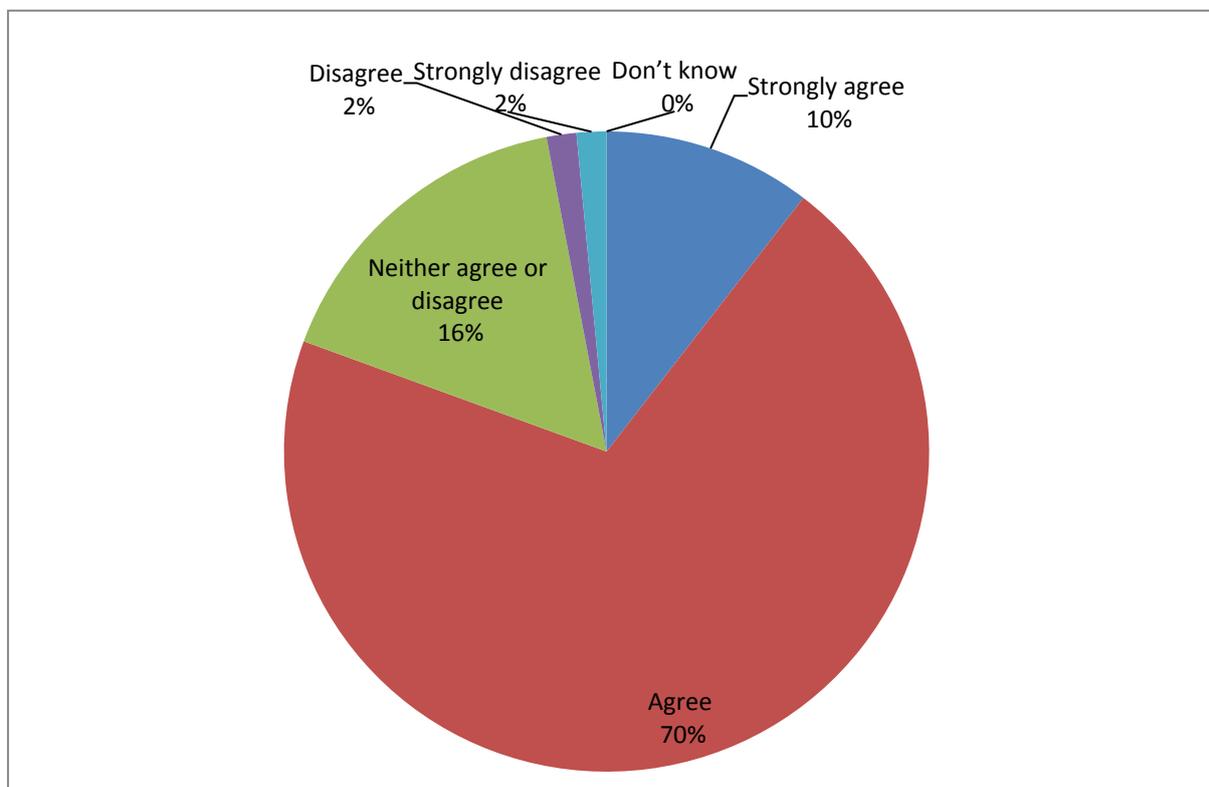
However, the challenges do not identify or specifically mention the issue of funding for maintenance, they generally focus on capital investment.

**You said, we did:**

The funding for maintenance of drains and other local flood risk management assets will be included in the funding challenge in Section 6 of the Local Strategy as this does represent a significant challenge to the management of local flood risk.

**Question 6. To what extent do you agree or disagree with the objectives for local flood risk management as set out in the Local Strategy?**

This question was responded to by 67 responders. A breakdown of their responses is given in Figure 5.



**Figure 5 Breakdown of question 6 responses**

80% of responders either agreed or strongly agreed. 4% disagreed or strongly disagreed, 16% neither agreed or disagreed and no one said they don't know. Generally there was strong agreement that these objectives are appropriate.

Suggestions for further objectives focussed on the flood risk from new developments and maintenance of highway drains. Below are examples of comments from the responders:

The objectives are sound but there is a necessity to fulfil them, action is the most important part of this.

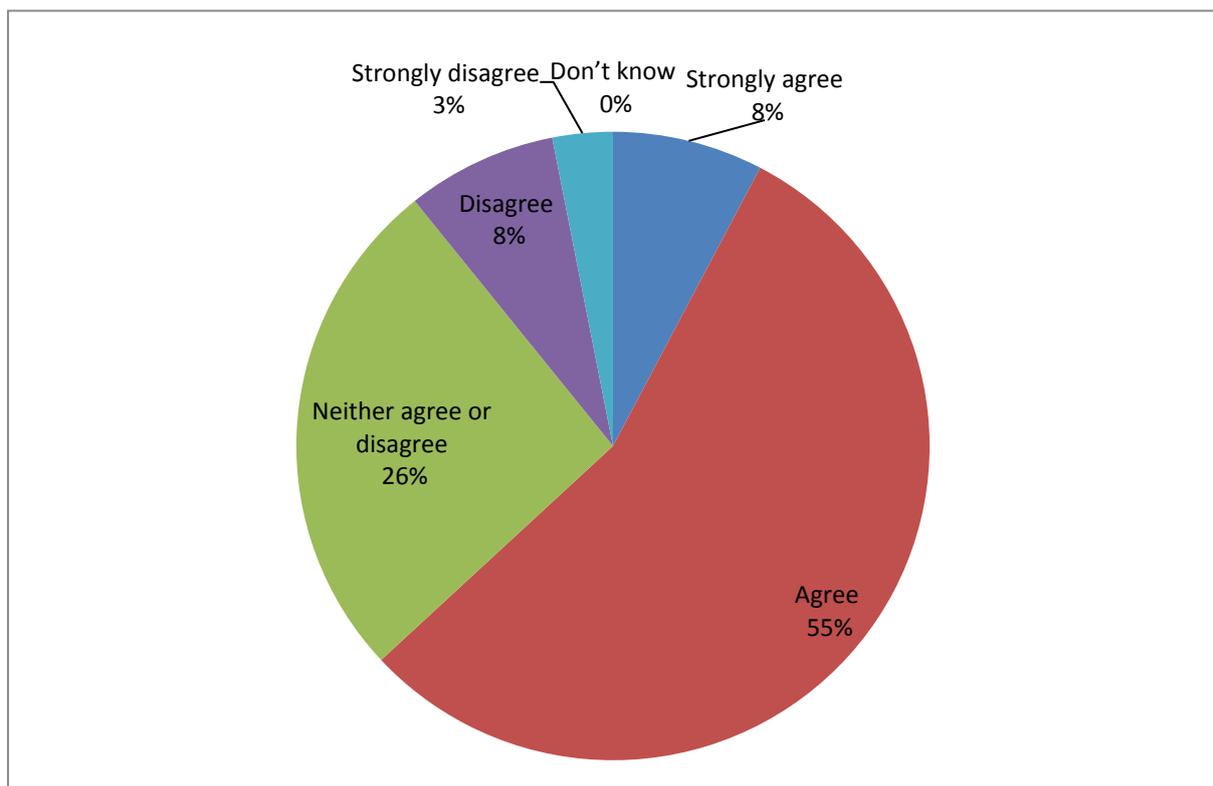
Regular maintenance and checks of current drainage systems

#### You said, we did:

Generally the responders said they agreed with objectives and we will keep them as they are in the draft Local Strategy.

#### Question 7. To what extent do you agree or disagree with the actions identified to deliver the objectives for local flood risk management as set out in the Local Strategy?

This question was responded to by 65 of the 68 respondents. A breakdown of their responses is given in Figure 6.



**Figure 6 Breakdown of question 7 responses**

63% agreed or strongly agreed with the proposed actions. 11% disagreed or strongly disagreed. 26% responded that they neither agree or disagree and no one responded that they don't know.

Suggestions for further actions included the same themes as the responses to previous questions; reducing the impact of new developments and improved highway drainage maintenance. There were also comments that there were not enough specific actions or delivery of measures to reduce flood risk. Comments in response to this question and other questions in this consultation also highlight that there need to be more links with environmental objectives and climate change.

Below are examples of comments from the respondents:

I think that maintenance of existing street/road drains needs to be improved

Interface and liaison with Local Authorities Local Development Plans to ensure the two agree and flood risk is included

needs additional actions in respect of preventing flooding from impacting on beach pollution levels for our seaside towns

Actions just seem to be more talking - not actually doing anything.

#### **You said, we did:**

Highway drainage maintenance policy is outside the scope of the Local Strategy. However, there is a need for better coordination between local flood risk management and highway drainage maintenance and this will be added to the Local Strategy.

There is an action plan of specific local flood risk management projects in the Local Strategy, however, it is clear that this is not well enough emphasised. More emphasis will be placed on delivering and maintaining the action plan. We will also improve the wording of other actions to make it clear that we will deliver measures to reduce the risks.

We will add actions that better integrate the delivery of the Local Strategy with other environmental strategies, plans and initiatives to better achieve multiple benefits across flooding and environmental sectors.

**Question 8. Do you have any other comments about the Local Strategy?**

35 responses were provided to this question. Some were on the recurring themes of highway drainage maintenance and housing developments and other issues raised in the previous questions. Many commented that they generally find that the Local Strategy was well produced but urging action on delivering measures or that there was not enough information. Some examples of the responses we received are shown below:

**You said, we did:**

This question did not raise any new issues from the previous comments. From the responses to the questionnaire in general, we will improve the links to the Flood Risk to Communities Documents and the Surface Water Management Plans to ensure the evidence base is accessible. We will also emphasise where we will deliver measures that manage local flood risk.

**5. Equality Analysis**

Respondents were given the opportunity to comment on the initial Equality Impact Assessment:

**Question 9. We have completed an initial Equality Impact Assessment (EqIA) for the draft Local Strategy. We welcome your views on our equality analysis and if you think there is anything we should consider relating to equality and diversity.**

There were eight responses and most of these expressed surprise at the use of an EqIA for this document. There were no substantive comments and nothing to change the EqIA.

**6. Next steps**

The revised Local Strategy, this consultation report and the EqIA will be presented to the Environment and Transportation Cabinet Committee on 30 November 2017. Following this the Local Strategy will be adopted by the Cabinet Member for Planning, Highways, Transport and Waste.

This consultation report will be made available on the consultation webpage and an email alert sent to those who registered with consultation.

Once the final Local Strategy has been adopted it will be available on our website.