

East Sussex Local Flood Risk Management Strategy – comments by Friends of Lewes

Introduction

The Friends of Lewes is the civic society for Lewes, was established in 1952 and has about 500 members. It is concerned with the conservation of the town of Lewes and the immediate surrounding countryside and because there is a history of flooding in this area it has a particular interest in this flood risk management strategy.

The Society welcomes the draft strategy because it outlines how ESCC will:

- discharge new challenging responsibilities for management of three significant but previously neglected sources of flood risk, (groundwater, surface-water and ordinary watercourses)
- lead other risk management authorities (RMAs) in measures to ensure the county gets a “joined up” approach to reducing as far as is affordable both the probability and consequences of flooding.

The Society supports the ESCC approach subject to the detailed comments that follow. It is a clear statement of the difficult job to be done. It welcomes the need for a more “joined up” approach to flood risk management. It also welcomes the commitment to an evidence based approach despite the difficulties this can cause to those traumatised by recent floods. However it has doubts about whether the time-scales set out in the Delivery Plan are realistic and achievable.

The Society considers that a clear distinction needs to be made between ESCC's responsibility to reduce flood risk from clearly identified sources and their leadership role. On the former it assumes there will be good progress on surface water management if relevant legislative provisions are activated promptly. For groundwater and ordinary watercourses problems are more diffuse and much will depend on the will to enforce existing responsibilities. On the leadership role the delivery plan is realistic in that objectives are set in terms of activities rather than outcomes. It is appropriate therefore that the priority is to facilitate discussion and analysis that improves the evidence base for appropriate actions within the sphere influence of each RMA, an approach that has been proved in the Lewes IUD. But a commitment to setting outcome objectives as discussion progresses within the next three years should be added.

Detailed comments.

P3 para 5. Succinct but inadequate. Redraft to reflect the full range of duties placed on ESCC by the 2010 Act. These are set out in Para 8 and the Appendix at A4.9 A clear distinction should be made between the leadership/ roles and the flood risk management (FRM) duties for surface and groundwater and ordinary watercourses.

P4 Box. The role of IDB's is under review and could be allocated to ESCC.

P5 para 10. Add “its probability” after manage

P5 para 13. Add “- blight in relation to e.g. business confidence, community spirit and tourism”

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P5 para 15. Illustrate evidence e.g. climate change, rising asset values and expectations.

P6 Box. The term leadership needs to be unpacked. Under the 2010 Act ESCC has to bring together all evidence and risk management options collected by the RMAs, promote resolution of inconsistencies and work towards consensus on priorities and actions. This is an inevitable consequence of not being the funding authority for most RMAs.

P6 Para 18. The bullet points need to reflect more clearly leadership and RMA roles in relation to flood incident management, recovery & flood warning. It would also be an appropriate place to introduce the word resilience. Effective response to flooding is valued very highly.

P8 para 25. Define flood hotspot. i.e. include in the strategy a summary of section A5 in the appendix including the strengths and weaknesses of the first assessment.

P9 Box. The last para in the box fails to capture the complex dynamism of resilience development. Location of emergency services in the floodplain is a common and vexed question. Service providers rightly point out that floodplain locations can often improve efficiency and effectiveness when the area is not flooded. (99.98% of the time on the basis of historic experience in Lewes.) Floodplain location with effective resilience planning may thus be the best solution.

P9 para 30. Would be helped by distinguishing between ESCC roles in

- 1 - management of previously neglected flood sources.
- 2 – integration of the evidence base and prioritisation.
- 3 - coordination of other RMA effort in the absence powers to control funding

P10 para 33 2nd bullet. Include property developers, landowner organisations, Natural England and the conservation charities especially SWT and RSPB.

3rd bullet. It bodes ill for partnership if ESCC does not intend to thrash out a joint position with local lower tier authorities informed by an LGA brief.

P11 Box. How will the first two partnerships relate to the EA and the water companies? Good relations, based on trust and respect, like those that exist already in the Lewes IUD will be a critical factor for success.

P11 Para 34. The evidence base is vital. ESCC should ensure that other RMAs are fully involved in the review process to ensure that all stakeholders have full confidence in conclusions drawn.

P12 Para 37 – 39. Inevitably prioritisation is controversial. The Strategy should say how ESCC is going to develop/build consensus on weighting factors e.g. as between

- social, economic and environmental factors.
- Short and long term issues. e.g. in the long run sea level rise will dwarf other issues for the coastal communities and those to which the tide flows such as Lewes.
- Flood risk management and other issues e.g. water resource protection, and food security.

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P13 para 42. The contribution of third tier authorities should also be recognised. ESCC should make a more explicit commitment to

- building on the work that has already been done by others
- identifying gaps and finding means of plugging them
- not changing “branding” if at all possible – the EA has learnt from bitter experience that change without good reason alienates communities.

P14 paras 45 – 48. Whilst these emphasise the ESCC role in sustainable drainage they are not specific about the capacity deficits that need to be remedied. Reference should be made to the relationships between planners and the EA and to what can be done to require or encourage flood resilient development of borderline areas. Cooperation in awareness raising on flood resilience is also needed amongst developers and an informed public is an essential complement to a permissive planning system.

P14 para 49. Figures from the appendix should be summarised to emphasise the point that very little new money will be available to ESCC.

P14 para 50. The harsh reality of the new situation should be emphasised more strongly. There are still many people in Lewes who think that “they” should fix our flood problem. It is accepted that Lewes solutions will come more from resilience than reduced probability.

P15 para 51. Add an action point “The Council will work with all RMAs to identify least cost solutions that optimise the mix of resilience and reductions in flood probability”.

P15 para 55. Delete “in house” . Although the point has been made in para 53 it needs to be reinforced in para 55. In addition add “lead improvement in communications between RMAs”

P16 para 56. Whilst it is inevitable that many objectives have to be set in terms of activities rather than outcomes, there should be a commitment to replace activities with target outcomes as fast as possible. It follows also that critical review of the effectiveness of the many activities listed in the first part of the delivery plan is a top priority for 2017. Monitoring procedures need to be defined and initiated now and the necessary resources need to be allocated. This is so important that it needs its own objective. It is a project that might better, have more credibility and cost less if it was outsourced.

Delivery Plan. In the Empowering Communities section there should be a commitment to produce a user friendly account of what the strategy means for “you”. The first edition of “What our strategy means for you” material should be promised for 2015 – 17 so that communities are in a better position to respond to the next strategy consultation in 2017. There should also be a specific commitment to looking further ahead to say 10, 25 and 100 year strategies having regard to the economic, social and environmental challenges that could be significant. The aim would be to engage communities in discussion of for example intergenerational issues.

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