



Draft West Sussex Local Flood Risk Management Strategy (LFRMS) 2021 – 2026 Consultation Summary, Autumn 2021

1. Introduction

West Sussex County Council Lead Local Flood Authority (LLFA) has a duty to consult key stakeholders (incl. the public) in relation to its Local Flood Risk Management Strategy under the Flood & Water Management Act 2010 [FWMA2010] and associated Flood Risk Management Regulations 2009 [FRM2009]. The Local Flood Risk Management Strategy sets out how West Sussex County Council will undertake its flood risk management responsibilities over the years 2021 to 2026 to meet the requirements of the Flood and Water Management Act 2010. Subsequent action plans or programmes of work derived are likely to be funded by a combination of different funding schemes.

Engagement with key stakeholders was undertaken throughout the preparation stages between 2019 – 2020. A combination of face-to-face workshops and online meetings was facilitated by the LLFA's appointed consultant, JBA, and was then scaled up and shared for wider public participation.

West Sussex LLFA consulted on the Draft Local Flood Risk Management Strategy 2021 – 2026 (LFRMS) between September and October 2021. Over that period responses from over 150 groups and individuals, totalling over 520 individual comments, were received. These comments were from our professional partners, individuals, town and parish councils, and other local organisations. This document provides a summary of the feedback received on the online consultation hosted on the WSCC 'Your Voice' digital platform.

2. Approach to consultation

The draft LFRMS was prepared by the LLFA and its consultants, incorporating the feedback from the two stakeholder workshops and additional meetings between technical liaison groups since 2019.

The draft LFRMS was published for six weeks to allow comments to be made in the context of the following themes:

- (a) Risk of flooding from surface water, groundwater, and ordinary watercourses (The remit of the LLFA).
- (b) Which authority is responsible for what in relation to the management of local flood risk?
- (c) The role of West Sussex County Council as Lead Local Flood Authority.
- (d) Views on Climate Change and Adaptation.

The online survey was hosted on the West Sussex 'Your Voice' engagement hub with appropriate links to further information.

To keep the exercise more inclusive and therefore accessible, electronic versions of the survey were made available by email that could be printed for use as necessary by members of the public.

Press releases were prepared for county and local newspapers to promote the consultation and survey and how people could take part. A social media campaign via Facebook and Twitter was also published and monitored. The WSCC Residents, Town/Parish Councils E-newsletters as well as our internal publication of the bulletin were also used to promote the consultation.

The Communications plan for the LFRMS Consultation identified several key stakeholder groups from which to seek views as well as the recommended primary method of engagement for each group. The stakeholder groups identified at the consultation planning stage included but were not necessarily limited to:

- Potential locally affected residents/businesses in the immediate vicinity of any of the initial 25 Priority Areas;
- Resident groups and individuals who have coordinated past community responses to flood risk consultations;
- Parish/Town Councils;
- Borough and District Councils;
- Neighbouring Authorities;
- Local Members and Members of Parliament;
- Landowners and/or their Agents;
- Utilities companies;
- Other statutory and non-statutory environmental bodies (for example, Environment Agency, Natural England); and
- Other 'hard to reach' groups including consultation bodies as required.

3. Survey Questions

As part of the consultation respondents were asked the following questions:

1. Is the purpose of the Local Flood Risk Management Strategy clear?
2. Do you agree or disagree with the 25 priority areas?
3. Have any significant flood risk areas not been considered?
4. Is the LFRMS concise, current, easy to navigate and understand?
5. Do you agree with the overall structure of the Local Flood Risk Management Strategy?
6. Is there anything you feel is missing from this Local Flood Risk Management Strategy or anything else we should be aware of?
7. On a scale of 1 -5 where 1 represents 'not at all' and 5 represents 'very well', overall, how well do you think the Local Flood Risk Management Strategy will be successful in reducing flood risk?
8. Do you feel this strategy contributes positively to addressing the potential impacts of climate change and complements the WSCC Climate Change Strategy?

A series of optional demographic questions were inserted at the end of the main survey.

4. Summary of Responses (Residents/Individuals)

The following is a summary of the key responses to the question posed:

1. Is the purpose of the Local Flood Risk Management Strategy clear?

Most of the respondents agreed that the purpose of the draft strategy was clear and the setting of the 5-year vision was good. Other comments set out that further clarity could be given as to the responsibility for the maps and statistics for deriving the overall purpose. It was also expressed that the purpose of the LFRMS could be further clarified and focussed on more specific actions. A concern was also expressed as to who is involved and the level of coordination required to achieve the local strategy's specific purpose.

2. Do you agree or disagree with the 25 priority areas?

Most respondents broadly agreed with the 25 priority areas presented. However, it was stated that more could be done beyond simply focusing on the priority areas. Some viewed 25 priority areas as too narrow a focus in the context of over 150 areas awarded a priority score. It was suggested work could be done in other areas with many specific locations offered. Lots of 'similar scale' surface water flooding has been widespread over many more areas than the 'top 25'. It was also suggested that the reliability, quantity and quality of the baseline data may contain assumptions and inaccuracies that may have inadvertently skewed the analyses.

3. Have any significant flood risk areas not been considered?

The respondents could neither agree nor disagree on the yes-no basis. Many respondents agreed with the key significant areas but equally there were a variety of locations offered in comparison.

4. Is the LFRMS concise, current, easy to navigate and understand?

No clear consensus emerged; however, the majority did agree that it was presented on the assumption of current knowledge, understanding and best professional judgement. A significant majority disagreed that the document was easy to understand, due to its technical content and the complexity of some of the information it contained and presented. Similarly, a significant majority disagreed that the document was easy to navigate and search for certain information.

5. Do you agree with the overall structure of the Local Flood Risk Management Strategy?

Many respondents agreed with the structure of the strategy as presented, however, some level of difficulty was noted by some respondents to navigate and better understand its content. A general feeling was voiced that it could be more focussed on actions achieving specific outcomes.

6. Is there anything you feel is missing from this Local Flood Risk Management Strategy or anything else we should be aware of?

It was perceived that significant fluvial and coastal issues had been overlooked and omitted as well as whole lifecycle consideration for the potential effects of climate change and in particular sea level rise. The topics of wastewater and sewage capacity were also heavily cited within the context of development management and building within flood plains. Lack of maintenance with respect to assets as well as the inability to recognise future infrastructure requirements were also significant concerns raised. A final common theme was that a clear summary of the current situation would have been beneficial detailing the short, medium, and longer-term proposals for action.

7. On a scale of 1 -5 where 1 represents 'not at all' and 5 represents 'very well', overall, how well do you think the Local Flood Risk Management Strategy will be successful in reducing flood risk?

At the time of the consultation, the majority (c90%) of respondents appear not to feel confident (Score of <3) that the strategy as presented would have the desired effect of being successful in reducing local flood risk. It was suggested that other drivers, political priorities, such as the carbon agenda, NetGain and Energy policy may be to the detriment of traditional flood risk management activities. It was suggested funding will be a significant issue as well as wider implications of the planning regime and local development management.

8. Do you feel this strategy contributes positively to addressing the potential impacts of climate change and compliments the WSCC Climate Change Strategy?

Half of the total number of respondents either agreed or somewhat agreed that the strategy contributes positively to the potential impacts from climate change. However, more uncertainty was expressed as to how it will complement the local WSCC Climate Change Strategy with competing political priorities emerging. The need to realise multiple benefits to West Sussex County Council activities showed strongest support.

Optional demographic questions at the end of main survey.

Half the total number of respondents were identified as being male with 30% female and the remainder preferring not to say. Many respondents being between the ages of 45 -65 with the next highest category being over 75. Less than 1% were under the age of 35. In the context of religious beliefs nearly half of the respondents stated Christian with the majority citing 'other' or no religion. Much of our population sample deemed themselves to be in good health at the time of the consultation.

5. Responses from our Professional Partners (Other RMAs)

Several significant representations were received from four of the LLFA's key professional partners as set out below:

Environment Agency (EA)

The EA support the strategy and suggested there would be future opportunities for innovation and research and a more collaborative way of working. Adaptation was seen to be more difficult, however not impossible, to be achieved through SuDS and looking at wider multiple benefit schemes such as Natural Flood Management. It was stated that the EA would continue to develop schemes in collaboration as well as continue to support data and information sharing.

Natural England (NE)

Natural England's response focussed on the need for the strategy to comply with existing and emerging legislative and policy requirements. An updated SEA and HRA are required and there are now more legislative provisions with regard to Biodiversity Net Gain.

Marine Management Organisation (MMO)

The MMO generally support the LFRMS and signposted the LLFA to relevant elements of reference to the local Marine Plan with respect to the Marine and Coastal Access Act (2009) as well as clauses from the Marine Policy Statement with respect to Climate Change Adaptation and Mitigation and Coastal Change and Flooding.

Southern Water (SWS)

Southern Water supports the aims of the LFRMS along with the six objectives. It pointed out that the link between this and the WSCC Climate Change Strategy is a significant one. A few technical clarifications were requested around specific responsibilities and potentially legally driven definitions. Southern Water acknowledges that although water companies have a significant role to play, they do not always have the clear remit or processes in place to act without the assistance of Professional Partners.

6. Key themes

The responses have been categorised into one of the following areas to help show the key themes that came through the consultation on the LFRMS:

- a. Clarification of where there may have been a misunderstanding in the Strategy documents with respect to clarity/language or presentation.
- b. Signposting responses to where existing information is located which addresses a query or comment.
- c. Identifying specific local issues which need to be investigated outside of the Strategy.
- d. Amending the Strategy documents and confirm what change has been made.

Comments that did not fit into any of the categories were still considered in the consultation.

The key themes emerging from this round of consultation were:

1. The ranking and prioritisation of risk areas at the Parish or Borough level, and the order in that any works may occur.

Any programme of work would be generated based on priority, clearly identifying what funding may be accessible and what is not yet funded. A 'Top 25', five per strategy year, of prioritised areas have been considered by the Risk Management Authorities. This shows where work will be considered first, however this does not guarantee work will go ahead in these locations. It is intended that the focus on investigation and identifying options will be the primary consideration, and any programme of work would be a 'living document' and be published as appropriate. Action & Implementation plans would also be developed for these priority areas.

2. Locations of recent and historic flooding

Feedback has been received on the detail of the flood mapping and the data shown on the 25 Priority Areas maps. Data and information will be shared with the Environment Agency and local Drainage Engineers when considering the new surface water flood maps (NaFRA2) due to be published in 2023. It is intended that where necessary and/or appropriate the LFRMS will be reviewed to take account of any significant changes.

3. Funding, gaps, and reliance on partnership projects

Appropriate funding for any projects and programmes will inform the Economic Business Case during strategy implementation. Sources of potential funding have been highlighted in the LFRMS to show more transparency that many future projects will need significant third-party contributions if they are to be considered viable solutions.

4. Development Management and wider planning process

The main concern residents expressed have about new development is the perceived increase of flood risk to the existing housing stock as well as future housing needs. The Planning and Development Management process is a key factor for strategy implementation. These considerations have been deemed currently out of scope for this round of consultation. The relevant Local Planning Authority (LPA) take the lead on such matters now and in future.

5. Riparian Responsibilities

The key duties and responsibilities have been outlined within the scope of the strategy document.

6. Public Engagement

This process is iterative, therefore further consultation and engagement activities will continue over the lifetime of the strategy. Stakeholders and interested parties will have opportunities to get involved in collaboration with West Sussex County Council, District and Borough Councils, local groups and the Parish and Town Councils.