

Online Responses

Anonymous Response

Response ID: ANON-HPP7-TGTF-M

Submitted to: North West Regional Flood and Coastal Committee Draft Business Plan 2019 to 2022

Submitted on: 2018-12-20 10:28:47

About the consultation

About you

1) Please tell us if you are responding as an individual or on behalf of an organisation or group:

Responding as an individual

If you selected other, please specify:

N/A

2) What is your email address?

N/A

3) Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity:

Yes

If you do not want us to publish your response, you need to tell us why:

N/A

4) Please tell us how you found out about this consultation:

From the Environment Agency

Your views

1) Do you consider yourself or those you represent to be at risk of flooding or coastal erosion?

Yes

2) How familiar with the North West Regional Flood and Coastal Committee were you before reading this business plan?

I was somewhat familiar with what the Committee does

3) Having read the business plan, do you have a better understanding of:

a) understanding of business plan - the role of the RFCC?:

Yes

b) understanding of business plan - what we are aiming to achieve?:

Yes

Please provide further information to support your answer:

N/A

4) In the draft business plan (pages 18 - 23) there are 12 proposed objectives. Please rank these objectives in order of importance, with 1 being the most important and 12 being the least important.

Objective ref.	Objective description	Ranking
A1	To measure, assess and improve the effectiveness and efficiency of risk management authorities' collective engagement with communities on flood and coastal erosion risk management	11
A2	To better understand the increasing risks in the North West arising from our changing climate and develop means of communicating this in order to increase communities' resilience	3
A3	To build an evidence base to demonstrate to coastal communities the likely scale of challenge faced in managing coastal erosion	4
A4	Using this evidence to begin discussing adaptation options with those communities	8
B1	To successfully deliver, build on and develop our natural flood management programme	6
B2	To develop and strengthen partners' approach to engaging, planning and managing water at catchment scale	1
B3	To agree some waterbodies which could be operated to both maintain supply and help reduce flood risk, and to implement revised or trial operating protocol on at least one	12
B4	To increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments	7
B5	To find more ways to enhance the environment and recreational amenity through our flood risk management programme	10
B6	To influence the future system of environmental land management payments and to make best use of the existing payments.	9
C1	To increase understanding of the multiple benefits of flood and coastal erosion risk management schemes, how to value and promote them, and develop the skills pipeline in the North West to support the timely and effective development of place-based schemes and approaches.	5
C2	To attract new partners and funding for integrated schemes, particularly from the private sector, which will reduce flood or coastal erosion risk and provide multiple benefits	2

5) Please tell us if you have any other comments on the priorities set out in the business plan.

Other comments on the priorities:

The priorities seem good - they are all important. Overall the document is so long and the priorities are fairly low down in it, it is difficult to identify them as important priorities in the current format. Could you flag them earlier?

6) Please tell us if you are a potential partner with similar objectives and provide details of any opportunities for us to work together. Suggestions of opportunities:

EA FCRM team member - there are many areas of cross-over (as you would hope). The joined up approach to partnership resources and engagement/ empowerment of communities seem particularly pertinent.

Further comments

7) Please tell us if you have any further comments that have not been covered by the previous questions and provide as much information as possible to support your answer.

Any further comments:

Think that it would be helpful if the document was more concise to ensure that key messages are easy to distill. Possibly use an appendix for some maps, tables etc?

Your feedback on this online tool

8) How satisfied were you with the tool?

Satisfied

Please tell us if you have any suggestions on how we could improve the tool:

N/A

Fylde Council Response

Response ID: ANON-HPP7-TGT7-5

Submitted to: North West Regional Flood and Coastal Committee Draft Business Plan 2019 to 2022

Submitted on: 2019-01-08 10:33:09

About the consultation

About you

1) Please tell us if you are responding as an individual or on behalf of an organisation or group:

Responding on behalf of an organisation or group

If you selected other, please specify:

N/A

2) What is your email address?

Your email address:

N/A

3) Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity:

Yes

If you do not want us to publish your response, you need to tell us why:

N/A

4) Please tell us how you found out about this consultation:

From the Environment Agency

Other:

Responding as an organisation or group

5) Please state the name of the organisation or group you are responding on behalf of.

Name of organisation or group:

Fylde Council

Your views

1) Do you consider yourself or those you represent to be at risk of flooding or coastal erosion?

Yes

2) How familiar with the North West Regional Flood and Coastal Committee were you before reading this business plan?

I was somewhat familiar with what the Committee does

3) Having read the business plan, do you have a better understanding of:

a) understanding of business plan - the role of the RFCC?

Yes

b) understanding of business plan - what we are aiming to achieve?

Maybe

Please provide further information to support your answer:

The Business Plan could be a bit more succinct, but what is aimed to be achieved is apparent.

4) In the draft business plan (pages 18 - 23) there are 12 proposed objectives. Please rank these objectives in order of importance, with 1 being the most important and 12 being the least important.

Objective ref.	Objective description	Ranking
A1	To measure, assess and improve the effectiveness and efficiency of risk management authorities' collective engagement with communities on flood and coastal erosion risk management	11
A2	To better understand the increasing risks in the North West arising from our changing climate and develop means of communicating this in order to increase communities' resilience	1
A3	To build an evidence base to demonstrate to coastal communities the likely scale of challenge faced in managing coastal erosion	6
A4	Using this evidence to begin discussing adaptation options with those communities	7
B1	To successfully deliver, build on and develop our natural flood management programme	2
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B3	To agree some waterbodies which could be operated to both maintain supply and help reduce flood risk, and to implement revised or trial operating protocol on at least one	12
B4	To increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments	8
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C1	To increase understanding of the multiple benefits of flood and coastal erosion risk management schemes, how to value and promote them, and develop the skills pipeline in the North West to support the timely and effective development of place-based schemes and approaches.	4
C2	To attract new partners and funding for integrated schemes, particularly from the private sector, which will reduce flood or coastal erosion risk and provide multiple benefits	5

5) Please tell us if you have any other comments on the priorities set out in the business plan.

Other comments on the priorities:

Would like to stress the importance of integrated partnership working, and enabling funding for schemes from various sources.

Since around the mid-2000's Local Authorities have had resource and powers reduced, and it is felt that Local Authorities are best placed in terms of knowledge, and contacts, to develop and deliver schemes. For instance, Local Authorities have close links to potential contributors and beneficiaries. The lead Local Flood Authority initiative was okay in principle (given power back to local sources but perhaps has not performed as well as envisaged in practise.

6) Please tell us if you are a potential partner with similar objectives and provide details of any opportunities for us to work together.

Suggestions of opportunities:

Yes, Fylde Council is a partner, currently delivering a programme of flood and erosion defences. We are trying to raise the awareness of the risk of flooding and erosion, and implement measures to mitigate this in the long term.

Within our catchment there are some critical flood embankments (Lytham Creek Embankments, in the approved Strategy for renewal by 2019). These embankments are the EA's responsibility; but we currently have a temporarily mobilised team developing and delivering flood and erosion defences. We would be interested to see how we could work together with the EA to develop and deliver these critical flood embankments.

Further comments

7) Please tell us if you have any further comments that have not been covered by the previous questions and provide as much information as possible to support your answer.

Any further comments:

We would welcome a more integrated approach to managing flood risk with the EA and the Lead Local Authority (Lancashire County Council); including developing and delivering Schemes.

Such an approach could work well with more presence from the EA on a day to day basis (not necessarily every day, nor even every week, but a close and open working relationship nonetheless due to the joint objectives in realising/reporting outcome measures). Occasional visits and occasional workshops are fine, but due to Local Authority pressures it would be useful to have integrated teams working together.

West Lancashire Borough Council Response

Response ID: ANON-HPP7-TGTG-N

Submitted to: North West Regional Flood and Coastal Committee Draft Business Plan 2019 to 2022

Submitted on: 2019-02-04 12:07:44

About the consultation

About you

1) Please tell us if you are responding as an individual or on behalf of an organisation or group:

Responding on behalf of an organisation or group

If you selected other, please specify:

N/A

2) What is your email address?

Your email address:

N/A

3) Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity:

Yes

If you do not want us to publish your response, you need to tell us why:

N/A

4) Please tell us how you found out about this consultation:

From another organisation

Other:

Responding as an organisation or group

5) Please state the name of the organisation or group you are responding on behalf of.

Name of organisation or group:

West Lancashire Borough Council

Your views

1) Do you consider yourself or those you represent to be at risk of flooding or coastal erosion?

Yes

2) How familiar with the North West Regional Flood and Coastal Committee were you before reading this business plan?

I was somewhat familiar with what the Committee does

3) Having read the business plan, do you have a better understanding of:

a) understanding of business plan - the role of the RFCC?

Yes

b) understanding of business plan - what we are aiming to achieve?

Yes

Please provide further information to support your answer:

N/A

4) In the draft business plan (pages 18 - 23) there are 12 proposed objectives. Please rank these objectives in order of importance, with 1 being the most important and 12 being the least important:

Objective ref.	Objective description	Ranking
A1	To measure, assess and improve the effectiveness and efficiency of risk management authorities' collective engagement with communities on flood and coastal erosion risk management	0
A2	To better understand the increasing risks in the North West arising from our changing climate and develop means of communicating this in order to increase communities' resilience	3
A3	To build an evidence base to demonstrate to coastal communities the likely scale of challenge faced in managing coastal erosion	0
A4	Using this evidence to begin discussing adaptation options with those communities	0
B1	To successfully deliver, build on and develop our natural flood management programme	0
B2	To develop and strengthen partners' approach to engaging, planning and managing water at catchment scale	0
B3	To agree some waterbodies which could be operated to both maintain supply and help reduce flood risk, and to implement revised or trial operating protocol on at least one	0
B4	To increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments	1
B5	To find more ways to enhance the environment and recreational amenity through our flood risk management programme	0
B6	To influence the future system of environmental land management payments and to make best use of the existing payments.	0
C1	To increase understanding of the multiple benefits of flood and coastal erosion risk management schemes, how to value and promote them, and develop the skills pipeline in the North West to support the timely and effective development of place-based schemes and approaches.	0
C2	To attract new partners and funding for integrated schemes, particularly from the private sector, which will reduce flood or coastal erosion risk and provide multiple benefits	2

5) Please tell us if you have any other comments on the priorities set out in the business plan.

Other comments on the priorities:

N/A

6) Please tell us if you are a potential partner with similar objectives and provide details of any opportunities for us to work together.

Suggestions of opportunities:

N/A

Further comments

7) Please tell us if you have any further comments that have not been covered by the previous questions and provide as much information as possible to support your answer:

Any further comments:

You have recognised that SuDS is important as an objective is to increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments. You aim to do this by understanding how sustainable drainage requirements are being implemented on new developments, issues constraining this and identifying any steps we could take across the North West to encourage stronger and more consistent implementation.

The implementation of SuDS is happening but definitely needs a consistent approach. However, the long term maintenance of SuDS seems to be ignored. There is only so much that can be done through planning so who is going to undertake or police ongoing maintenance? Developers elect to use management companies to undertake the maintenance for the lifetime of the development which is 100 years. Being realistic is this sustainable?

Your feedback on this online tool

8) How satisfied were you with the tool?

Satisfied

Please tell us if you have any suggestions on how we could improve the tool:

N/A

United Utilities Response

Response ID: ANON-HPP7-TGTN-V

Submitted to: North West Regional Flood and Coastal Committee Draft Business Plan 2019 to 2022

Submitted on: 2019-02-07 16:53:48

About the consultation

About you

1) Please tell us if you are responding as an individual or on behalf of an organisation or group:

Responding on behalf of an organisation or group

If you selected other, please specify:

N/A

2) What is your email address?

Your email address:

N/A

3) Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity:

Yes

If you do not want us to publish your response, you need to tell us why:

N/A

4) Please tell us how you found out about this consultation:

From another organisation

Other:

Responding as an organisation or group

5) Please state the name of the organisation or group you are responding on behalf of.

Name of organisation or group:

United Utilities

Your views

1) Do you consider yourself or those you represent to be at risk of flooding or coastal erosion?

Yes

2) How familiar with the North West Regional Flood and Coastal Committee were you before reading this business plan?

I was very familiar with what the Committee does

3) Having read the business plan, do you have a better understanding of:

a) understanding of business plan - the role of the RFCC?

Yes

b) understanding of business plan - what we are aiming to achieve?

Yes

Please provide further information to support your answer:

The plan is excellent about explaining what the RFCC does, however as this is a business plan, United Utilities would expect more detail on plan delivery, including project specific details, as well as more detailed financial information.

4) In the draft business plan (pages 18 - 23) there are 12 proposed objectives. Please rank these objectives in order of importance, with 1 being the most important and 12 being the least important:

Objective ref.	Objective description	Ranking
A1	To measure, assess and improve the effectiveness and efficiency of risk management authorities' collective engagement with communities on flood and coastal erosion risk management	2
A2	To better understand the increasing risks in the North West arising from our changing climate and develop means of communicating this in order to increase communities' resilience	11
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A4	Using this evidence to begin discussing adaptation options with those communities	10
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B3	To agree some waterbodies which could be operated to both maintain supply and help reduce flood risk, and to implement revised or trial operating protocol on at least one	5
B4	To increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments	3
B5	To find more ways to enhance the environment and recreational amenity through our flood risk management programme	7
B6	To influence the future system of environmental land management payments and to make best use of the existing payments.	12
C1	To increase understanding of the multiple benefits of flood and coastal erosion risk management schemes, how to value and promote them, and develop the skills pipeline in the North West to support the timely and effective development of place-based schemes and approaches.	6
C2	To attract new partners and funding for integrated schemes, particularly from the private sector, which will reduce flood or coastal erosion risk and provide multiple benefits	8

5) Please tell us if you have any other comments on the priorities set out in the business plan.

Other comments on the priorities:

United Utilities believe that all objectives are equally important, ranking is compliant of the dictated process and not totally reflected of the equal importance we attach. If possible we would propose, further fast track consultation on these priorities with responders requested to indicate a high,

medium, or low priority status to the activities listed. Such an approach may give truer and more valuable insight into the most valued activities.

B3: To agree some waterbodies which could be operated to both maintain supply and help reduce flood risk, and to implement revised or trial operating protocol on at least one United Utilities would question as to whether the use of water resource assets to manage flood risk can be referenced given continuing disagreement over consequential flood liability and indemnities.

B4: To increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments Comment: United Utilities would suggest the following to be added to the end of this statement; adoption and retrofitting of such installations should be actively pursued by all RMA's.

6) Please tell us if you are a potential partner with similar objectives and provide details of any opportunities for us to work together.

Suggestions of opportunities:

As a fellow risk management authority, United Utilities has many similar objectives with partnership potential, this is building on from the existing partnership opportunities we have already embraced over the last business planning period. Our proposed AMP7 performance commitments relating to reducing flood risk to our customers is challenging and will require us to work in partnership with other risk management authorities to achieve the targets suggested in our business plan. Options we consider for reducing flood risk align with the RFCC's business plan objectives; embracing SuDS opportunities and considering their adoption, natural flood management as an alternative to hard engineering solutions and slowing the flow as part of catchment based solutions.

As a company we are also interested in the natural capital benefit to any potential partner opportunities as this is also a performance commitment featuring in our AMP7 business plan. United Utilities also looks for opportunity to separate surface water from our combined sewer network which occasionally interacts with third party assets and we rely on a close relationship with other RMAs to allow partnering on such projects.

As the WaSC for the North West, we also create opportunity to regularly discuss development and the effect development has on the sewer network. As United Utilities are not a statutory consultee on any development applications, we actively seek to partner with other authorities to ensure the impact to the sewer network is appropriately considered. Whilst the business plan makes commendable statements and ambition regarding improving management of surface water and reducing flood risk through constructing interventions there is no reference to measures aimed at preventing urban creep and ensuring adequate and appropriate maintenance of flood risk assets. United Utilities strongly advocate the application of the following by Local Planning Authorities (LPA's), Lead local Flood Authorities (LLFA's) and Highway Authorities (HA's):

- All LPA's should robustly apply and enforce the SuDS hierarchy when considering new development proposals. We believe that this should also be reinforced by LLFA's
- All LPA's should promote the rules around permitted development relating to property owners paving over permeable areas with impermeable surfaces/materials. Where non-compliance is observed enforcement action should be taken
- All LLFA's should ensure that riparian fulfil their statutory obligation to maintain watercourses in order to convey full flow capacity – where necessary taking enforcement action.
- All HA's should manage highway drainage assets in a manner that reduces the risk of flooding, and inundation of other drainage assets, optimising flow and capacity benefits that those assets provide.

United Utilities feel that failure to provide the above fundamental aspects could negate all of the other best efforts to manage surface water that this business plan provides for.

The appointment of the part funded RFCC and UU Flood Risk Partnership Manager will help to facilitate and encourage the partnership opportunities listed above.

Further comments

7) Please tell us if you have any further comments that have not been covered by the previous questions and provide as much information as possible to support your answer.

Any further comments:

Summary

United Utilities provides water and wastewater services to around 7 million customers in the North West of England, from Crewe to Carlisle. As a responsible business, we understand the role we play in safeguarding the quality of the environment, protecting and enhancing it whilst delivering our services. The recent headline severe weather events experienced in 2015 (Storms Desmond, Eva and Frank) and events in Millom (Sept 2017) and the Fylde Coast (November 2017) served to remind us the importance of collaborating with other (flood) Risk Management Authorities and working in partnership to reduce flood risk to local communities.

Whilst we have a statutory duty to maintain our asset base to safeguard the water quality of rivers and coastal waters in the North West we also have to ensure that our sewer network does not unnecessarily create or contribute to flood risk.

We also recognise the need to openly share our data and associated information relating to sewer flooding with other RMA's as it can help them understand flow contributions to issues they face and can serve to highlight locations of common flood issues/responsibility and identify opportunities to collaborate.

We acknowledge that there are potential cost efficiencies to be gained by RMA's identifying and scoping up joint schemes. In addition individual RMA's may be better resources and practiced in certain aspects of flood identification/management (e.g. hydraulic sewer modelling). Differing RMA's may also be better able to access contractor skills where they already exist within existing procurement strategies and supply chains.

The Business Plan has been consciously aligned with the developing direction for the environment as a whole, as set out in the government's 25 Year Environment Plan ('A Green Future: Our 25 Year Plan to Improve the Environment', January 2018). The plan also builds on the forward looking North West RFCC Vision 2030 work that has been underway for the past three years. Consequently the NW RFCC are already actively progressing elements now central to the 25 Year Environment Plan, for example natural flood management. In setting priorities and objectives for the next few years the RFCC have consolidated and shaped these in line with the Environment Plan.

It is anticipated that the activities outlined in the plan will both align with and support a new national Flood and Coastal Risk Management strategy that is currently being developed through a collaborative approach to set the overall national vision for the future and to help make the necessary decisions in the right way.

Whilst there are no specific questions posed by the consultation we would make the following observations and comments.

We are happy for our response to be shared openly and do not have any wish for it be kept confidential.

Foreword (p1) We note that there is no reference to UU in his opening section of the draft document. We attend RFCC and are active attendees of strategic partnership meetings, we are also a Risk Management Authority as required under the Flood and Water Management Act. Given that other key stakeholders are referred to in this section we believe, for completeness, reference should also be made to our organisation in a key stakeholder context.

Partnership with United Utilities (p5)

United Utilities and the Environment Agency have been engaged over a number of months discussing the potential for water resource assets to be utilised to provide storm water run-off capacity in advance of forecast significant rainfall events. It has not been possible to reach common agreement over responsibility and legal liability for and consequential downstream flooding and UU continue to seek indemnification by the EA. We would therefore question whether reference to water supply assets is appropriate given failure to agree on liability aspects.

We would suggest the inclusion of the following as a final paragraph to this section.

“In recognition of the part United Utilities can play in the promotion of flood risk reduction between RMA's and other partners we have part funded a Flood Risk Partnership Manager Role for 2 years from November 2011. It is anticipated that this role will serve to improve Partnership working through identification of best practice, application of lessons learned, identification of innovative approaches/funding and liaison to remove any obstacles to collaboration or partnership.”

Communities at risk of flooding from rivers and the sea (p8)

We believe that the document would benefit from clearer images (sharper) than the map shown in the draft document and would also suggest consideration is given to showing sections of the region per page in order to identify areas at risk more clearly.

Communities at risk of flooding from Surface Water (p9)

Again we believe that the document would benefit from clearer images (sharper) than the map shown in the draft document and would also suggest consideration is given to showing sections of the region per page in order to identify areas at risk more clearly.

Surface Water Flooding (p10)

We would suggest that the first sentence is amended to read “in Sewer, drainage and watercourse networks being overwhelmed”. Often lay people attribute sewers and drains to the water company and this is not the case, watercourses also contribute to urban flood risk.

2nd paragraph: Some LLFA's currently offer “light touch scrutiny” to developers' proposals to further culverting of watercourses or diversions of culverted watercourses yet we are all fully aware of the benefits that opening up such piped systems can offer in terms of flood risk management We suggest adding: “Disturbance of existing or historical systems during development can also have a major impact on SW flooding and any alterations need to be understood and controlled”

The section also refers to “promoting the adoption of sustainable drainage systems and green infrastructure”. We feel that it should be emphasised that adoption of such assets is an option available to all RMA's and some community groups. In Spring of this year the Ofwat sewer adoption codes will be published relating to water company adoption of SuDS that qualify as prospectively adoptable sewer assets – it doesn't provide for the adoption of none sewer assets and such opportunities to vest and maintain should be considered by other stakeholders.

Whilst the business plan makes commendable statements and ambition regarding improving management of surface water and reducing flood risk through constructing interventions there is no reference to measures aimed at preventing urban creep and ensuring adequate and appropriate

maintenance of flood risk assets. United Utilities strongly advocate the application of the following by Local Planning Authorities (LPA's), Lead local Flood Authorities (LLFA's) and Highway Authorities (HA's):

- All LPA's should robustly apply and enforce the SuDS hierarchy when considering new development proposals. We believe that this should also be reinforced by LLFA's
- All LPA's should promote the rules around permitted development relating to property owners paving over permeable areas with impermeable surfaces/materials. Where non-compliance is observed enforcement action should be taken
- All LLFA's should ensure that riparian fulfil their statutory obligation to maintain watercourses in order to convey full flow capacity – where necessary taking enforcement action.
- All HA's should manage highway drainage assets in a manner that reduces the risk of flooding, and inundation of other drainage assets, optimising flow and capacity benefits that those assets provide. United Utilities feel that failure to provide the above fundamental aspects could negate all of the other best efforts to manage surface water that this business plan provides for.

Delivering the Investment Programme (p12)

In addition to the referencing of additional delivery resources funded by the RFCC we would also suggest reference to the UU/RFCC funded Flood Risk Partnership Manager role. We would suggest inclusion of the following; "We have also taken steps to improve partnership working between United Utilities and other RMA's through jointly funding A (UU) Flood Risk Partnership Manager role as outlined earlier."

Table 1 - Clarity needed as to how Allerdale is achieving 320 homes to be better protected as the table shows no financial investment.

Developing the future programme (p16)

We feel that paragraph 5 would benefit from the addition of the following; "To achieve these benefits LPA's and LLFA's need to ensure that development proposals brought forward strictly adhere to the hierarchy for sustainable drainage"

B: Using and managing land sustainably (p20)

Paragraph 2, second sentence, suggest amend to read "sewers, drains and watercourses".

Objectives, bullet #3. Again as similar to the above we would question as to whether the use of water resource assets to manage flood risk can be referenced given continuing disagreement over consequential flood liability and indemnities.

Objectives, bullet #4. Add to end of sentence "adoption and retrofitting of such installations should be actively pursued by all RMA's."

The response has been prepared by Tony Griffiths (tony.griffiths@uuplc.co.uk) and Sharma Jencitis (sharma.jencitis@uuplc.co.uk).

[Your feedback on this online tool](#)

8) How satisfied were you with the tool?

Satisfied

Please tell us if you have any suggestions on how we could improve the tool:

Include an attachments option

Association of Drainage Authorities Response

Response ID: ANON-HPP7-TGMR-T

Submitted to: North West Regional Flood and Coastal Committee Draft Business Plan 2019 to 2022

Submitted on: 2019-02-07 18:34:36

About the consultation

About you

1) Please tell us if you are responding as an individual or on behalf of an organisation or group:

Responding on behalf of an organisation or group

If you selected other, please specify:

N/A

2) What is your email address?

Your email address:

N/A

3) Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity:

Yes

If you do not want us to publish your response, you need to tell us why:

N/A

4) Please tell us how you found out about this consultation:

From the Environment Agency

Other:

Responding as an organisation or group

5) Please state the name of the organisation or group you are responding on behalf of.

Name of organisation or group:

ADA (Association of Drainage Authorities)

Your views

1) Do you consider yourself or those you represent to be at risk of flooding or coastal erosion?

Yes

2) How familiar with the North West Regional Flood and Coastal Committee were you before reading this business plan?

I was very familiar with what the Committee does

3) Having read the business plan, do you have a better understanding of:

a) understanding of business plan - the role of the RFCC?

Yes

b) understanding of business plan - what we are aiming to achieve?

Yes

Please provide further information to support your answer:

N/A

4 In the draft business plan (pages 18 - 23) there are 12 proposed objectives. Please rank these objectives in order of importance, with 1 being the most important and 12 being the least important.

Objective ref.	Objective description	Ranking
A1	To measure, assess and improve the effectiveness and efficiency of risk management authorities' collective engagement with communities on flood and coastal erosion risk management	0
A2	To better understand the increasing risks in the North West arising from our changing climate and develop means of communicating this in order to increase communities' resilience	6
A3	To build an evidence base to demonstrate to coastal communities the likely scale of challenge faced in managing coastal erosion	5
A4	Using this evidence to begin discussing adaptation options with those communities	0
B1	To successfully deliver, build on and develop our natural flood management programme	0
B2	To develop and strengthen partners' approach to engaging, planning and managing water at catchment scale	1
B3	To agree some waterbodies which could be operated to both maintain supply and help reduce flood risk, and to implement revised or trial operating protocol on at least one	4
B4	To increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments	3
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B6	To influence the future system of environmental land management payments and to make best use of the existing payments.	0
C1	To increase understanding of the multiple benefits of flood and coastal erosion risk management schemes, how to value and promote them, and develop the skills pipeline in the North West to support the timely and effective development of place-based schemes and approaches.	0
C2	To attract new partners and funding for integrated schemes, particularly from the private sector, which will reduce flood or coastal erosion risk and provide multiple benefits	2

5) Please tell us if you have any other comments on the priorities set out in the business plan.

Other comments on the priorities:

I have provided the top 6 priorities and consider that all the other priorities are of roughly equal importance behind the top 6.

6) Please tell us if you are a potential partner with similar objectives and provide details of any opportunities for us to work together.

Suggestions of opportunities:

ADA is keen to support the NW RFCC in strengthening its role across the North West and finding ways of developing local delivery mechanisms where the EA and Local Authorities, on their own, struggle to deliver work.

Further comments

7) Please tell us if you have any further comments that have not been covered by the previous questions and provide as much information as possible to support your answer.

Any further comments:

1. ADA very much supports the general production of this document and NW RFCCs principles of working in partnership with a wide range of interested parties.
2. NW RFCC should more explicitly include other significant potential partners such as the Canals & Rivers Trust, Network Rail, National Trust and the relevant National Park Authorities, for example
3. The Mission Statement should include the word “economy”. It features well elsewhere in the document and needs to be clearly cited as part of NW RFCC’s vision.
4. A key risk is the danger of people not properly understanding what cannot be promised or achieved. (i.e. completely preventing flooding)
5. Critical infrastructure is mentioned. What about ports, power generation and refineries/chemical plants?
6. £34m of partnership funding is mentioned. What is the split between private and public sector partnership funding?
7. All RFCCs have the option to raise funds through a General Drainage Charge. What is NW RFCC’s position on this?
8. Defra are introducing Environmental Land Management Schemes (ELMS). What is scope for NW RFCC to encourage and promote the uptake of these schemes in relation to catchment and water level management?
9. The EA’s withdrawal from maintaining certain main river assets across the region which are classified as a low flood risk is a cause for concern in some areas.
How can the NW RFCC play a key role in facilitating alternative arrangements for the local management of these assets in a long-term sustainable way?

Your feedback on this online tool

8) How satisfied were you with the tool?

Satisfied

Please tell us if you have any suggestions on how we could improve the tool:

N/A

Wirral Council Response

Response ID: ANON-HPP7-TGN3-U

Submitted to: North West Regional Flood and Coastal Committee Draft Business Plan 2019 to 2022

Submitted on: 2019-02-08 08:34:54

About the consultation

About you

1) Please tell us if you are responding as an individual or on behalf of an organisation or group:

Responding on behalf of an organisation or group

If you selected other, please specify:

N/A

2) What is your email address?

Your email address:

N/A

3) Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity:

Yes

If you do not want us to publish your response, you need to tell us why:

N/A

4) Please tell us how you found out about this consultation:

From the Environment Agency

Other:

Responding as an organisation or group

5) Please state the name of the organisation or group you are responding on behalf of.

Name of organisation or group:

Wirral Council

Your views

1) Do you consider yourself or those you represent to be at risk of flooding or coastal erosion?

Yes

2) How familiar with the North West Regional Flood and Coastal Committee were you before reading this business plan?

I was very familiar with what the Committee does

3) Having read the business plan, do you have a better understanding of:

a) understanding of business plan - the role of the RFCC?

Yes

b) understanding of business plan - what we are aiming to achieve?

Yes

Please provide further information to support your answer:

The Who We Are section and following text in the foreword clearly sets out the role of the RFCC. I understand what the RFCC is aiming to achieve through the business plan and acknowledge that erosion risk is identified as a theme of the plan however it would have been useful to put that into context with infographics like river, sea and surface water flood risk have been.

I think the reference to North West Coastal Group is incorrect on the flow chart and throughout the document. North West Coastal Group is a sub-Group, like Liverpool Bay Coastal Group. The overarching group is north West and North Wales Coastal Group.

4) In the draft business plan (pages 18 - 23) there are 12 proposed objectives. Please rank these objectives in order of importance, with 1 being the most important and 12 being the least important:

Objective ref.	Objective description	Ranking
A1	To measure, assess and improve the effectiveness and efficiency of risk management authorities' collective engagement with communities on flood and coastal erosion risk management	6
A2	To better understand the increasing risks in the North West arising from our changing climate and develop means of communicating this in order to increase communities' resilience	1
A3	To build an evidence base to demonstrate to coastal communities the likely scale of challenge faced in managing coastal erosion	9
A4	Using this evidence to begin discussing adaptation options with those communities	10
B1	To successfully deliver, build on and develop our natural flood management programme	5
B2	To develop and strengthen partners' approach to engaging, planning and managing water at catchment scale	8
B3	To agree some waterbodies which could be operated to both maintain supply and help reduce flood risk, and to implement revised or trial operating protocol on at least one	12
B4	To increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments	2
B5	To find more ways to enhance the environment and recreational amenity through our flood risk management programme	7
B6	To influence the future system of environmental land management payments and to make best use of the existing payments.	11
C1	To increase understanding of the multiple benefits of flood and coastal erosion risk management schemes, how to value and promote them, and develop the skills pipeline in the North West to support the timely and effective development of place-based schemes and approaches.	4
C2	To attract new partners and funding for integrated schemes, particularly from the private sector, which will reduce flood or coastal erosion risk and provide multiple benefits	3

5) Please tell us if you have any other comments on the priorities set out in the business plan.

Other comments on the priorities:

N/A

6) Please tell us if you are a potential partner with similar objectives and provide details of any opportunities for us to work together:

N/A

Suggestions of opportunities:

N/A

Further comments

7) Please tell us if you have any further comments that have not been covered by the previous questions and provide as much information as possible to support your answer.

Any further comments:

N/A

Your feedback on this online tool

8) How satisfied were you with the tool?

Neither satisfied nor dissatisfied

Please tell us if you have any suggestions on how we could improve the tool:

N/A

Eden Rivers Trust Response

Response ID: ANON-HPP7-TGTU-3

Submitted to: North West Regional Flood and Coastal Committee Draft Business Plan 2019 to 2022

Submitted on: 2019-02-08 10:28:31

About the consultation

About you

1) Please tell us if you are responding as an individual or on behalf of an organisation or group:

Responding on behalf of an organisation or group

If you selected other, please specify:

N/A

2) What is your email address?

Your email address:

N/A

3) Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity:

Yes

If you do not want us to publish your response, you need to tell us why:

N/A

4) Please tell us how you found out about this consultation:

Through an organisation, group or trade association you're a member of

Other:

N/A

Responding as an organisation or group

5) Please state the name of the organisation or group you are responding on behalf of.

Name of organisation or group:

Eden Rivers Trust

Your views

1) Do you consider yourself or those you represent to be at risk of flooding or coastal erosion?

No

2) How familiar with the North West Regional Flood and Coastal Committee were you before reading this business plan?

I was somewhat familiar with what the Committee does

3) Having read the business plan, do you have a better understanding of:

a) understanding of business plan - the role of the RFCC?

Yes

b) understanding of business plan - what we are aiming to achieve?

Yes

Please provide further information to support your answer:

N/A

4) In the draft business plan (pages 18 - 23) there are 12 proposed objectives. Please rank these objectives in order of importance, with 1 being the most important and 12 being the least important:

Objective ref.	Objective description	Ranking
A1	To measure, assess and improve the effectiveness and efficiency of risk management authorities' collective engagement with communities on flood and coastal erosion risk management	6
A2	To better understand the increasing risks in the North West arising from our changing climate and develop means of communicating this in order to increase communities' resilience	7
A3	To build an evidence base to demonstrate to coastal communities the likely scale of challenge faced in managing coastal erosion	11
A4	Using this evidence to begin discussing adaptation options with those communities	12
B1	To successfully deliver, build on and develop our natural flood management programme	4
B2	To develop and strengthen partners' approach to engaging, planning and managing water at catchment scale	3
B3	To agree some waterbodies which could be operated to both maintain supply and help reduce flood risk, and to implement revised or trial operating protocol on at least one	10
B4	To increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments	2
B5	To find more ways to enhance the environment and recreational amenity through our flood risk management programme	1
B6	To influence the future system of environmental land management payments and to make best use of the existing payments.	5
C1	To increase understanding of the multiple benefits of flood and coastal erosion risk management schemes, how to value and promote them, and develop the skills pipeline in the North West to support the timely and effective development of place-based schemes and approaches.	9
C2	To attract new partners and funding for integrated schemes, particularly from the private sector, which will reduce flood or coastal erosion risk and provide multiple benefits	8

5) Please tell us if you have any other comments on the priorities set out in the business plan.

Other comments on the priorities:

It is good to see an emphasis on working at a catchment scale and encompassing the value of the environment and amenity into flood schemes. This is much needed. It is good to see that increasing the adoption of SuDS is a priority for the RFCC. However, many schemes are being installed which

are labelled as SuDS yet do little to deliver on the 'Sustainable' element. This includes schemes which have the majority of storage underground, or collect all surface water in a single habitat-poor, fenced-off storage pond. We would like to see an increased requirement for SuDS to keep water above ground where possible. This maximises opportunity for both biodiversity and amenity.

6) Please tell us if you are a potential partner with similar objectives and provide details of any opportunities for us to work together:

N/A

Suggestions of opportunities:

We already work with the RFCC through the Eden Catchment Management Group. Eden Rivers Trust host this group.

Further comments

7) Please tell us if you have any further comments that have not been covered by the previous questions and provide as much information as possible to support your answer.

N/A

Any further comments:

In the section on catchment partnerships, the Eden is missing from the list.

A UU-hosted collaboration resource is mentioned. It would be good to have further details about this.

Some Local Levy funds have been made available for NFM work on the past. It is extremely helpful that this resource is available, however in future it would be good to have a clearer application process and eligibility criteria.

Your feedback on this online tool

8) How satisfied were you with the tool?

Satisfied

Please tell us if you have any suggestions on how we could improve the tool:

N/A

Mersey Rivers Trust Response

Response ID: ANON-HPP7-TGTT-2

Submitted to: North West Regional Flood and Coastal Committee Draft Business Plan 2019 to 2022

Submitted on: 2019-02-08 16:39:07

About the consultation

About you

1) Please tell us if you are responding as an individual or on behalf of an organisation or group:

Responding on behalf of an organisation or group

If you selected other, please specify:

N/A

2) What is your email address?

Your email address:

N/A

3) Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity:

Yes

If you do not want us to publish your response, you need to tell us why:

N/A

4) Please tell us how you found out about this consultation:

Through an organisation, group or trade association you're a member of

Other:

Responding as an organisation or group

5) Please state the name of the organisation or group you are responding on behalf of.

Name of organisation or group:

Mersey Rivers Trust

Your views

1) Do you consider yourself or those you represent to be at risk of flooding or coastal erosion?

Yes

2) How familiar with the North West Regional Flood and Coastal Committee were you before reading this business plan?

I was somewhat familiar with what the Committee does

3) Having read the business plan, do you have a better understanding of:

a) understanding of business plan - the role of the RFCC?

Yes

b) understanding of business plan - what we are aiming to achieve?

Yes

Please provide further information to support your answer:

N/A

4) In the draft business plan (pages 18 - 23) there are 12 proposed objectives. Please rank these objectives in order of importance, with 1 being the most important and 12 being the least important:

Objective ref.	Objective description	Ranking
A1	To measure, assess and improve the effectiveness and efficiency of risk management authorities' collective engagement with communities on flood and coastal erosion risk management	0
A2	To better understand the increasing risks in the North West arising from our changing climate and develop means of communicating this in order to increase communities' resilience	0
A3	To build an evidence base to demonstrate to coastal communities the likely scale of challenge faced in managing coastal erosion	0
A4	Using this evidence to begin discussing adaptation options with those communities	0
B1	To successfully deliver, build on and develop our natural flood management programme	0
B2	To develop and strengthen partners' approach to engaging, planning and managing water at catchment scale	0
B3	To agree some waterbodies which could be operated to both maintain supply and help reduce flood risk, and to implement revised or trial operating protocol on at least one	0
B4	To increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments	0
B5	To find more ways to enhance the environment and recreational amenity through our flood risk management programme	0
B6	To influence the future system of environmental land management payments and to make best use of the existing payments.	0
C1	To increase understanding of the multiple benefits of flood and coastal erosion risk management schemes, how to value and promote them, and develop the skills pipeline in the North West to support the timely and effective development of place-based schemes and approaches.	0
C2	To attract new partners and funding for integrated schemes, particularly from the private sector, which will reduce flood or coastal erosion risk and provide multiple benefits	0

5) Please tell us if you have any other comments on the priorities set out in the business plan.

Other comments on the priorities:

All of these are important

6) Please tell us if you are a potential partner with similar objectives and provide details of any opportunities for us to work together:

Suggestions of opportunities:

Potential for Mersey Rivers Trust working in partnership with the NW RFCC.

As a Rivers Trust and Catchment Partnerships host, we are committed to reducing flood risk as well as improving water quality, and we engage communities in achieving these. We are implementing Natural Flood Management (NFM) by delivering NFM projects in the Mersey catchments and we would like to do more. We already work with members of the catchment partnerships and we are keen to work in partnership with the NW RFCC.

Further comments

7) Please tell us if you have any further comments that have not been covered by the previous questions and provide as much information as possible to support your answer.

Any further comments:

Catchment Partnerships have a role in flood risk management. The Mersey Rivers hosts three Catchment Partnerships. Our partnerships' work is multi-beneficial and with our partners we identify areas where flood mitigation and water quality benefits can be realised together. This work often enables growth by holding water back. Closer links to RFCC would be helpful. NFM Delivery Group

Currently we are establishing a NFM Delivery Group for Merseyside, with two Catchment Partnerships along with local authorities. We would like the support of RFCC for this group.

Your feedback on this online tool

8) How satisfied were you with the tool?

Satisfied

Please tell us if you have any suggestions on how we could improve the tool:

N/A

Greater Manchester Combined Authority Response

Submitted to: North West Regional Flood and Coastal Committee Draft Business Plan 2019 to 2022

Submitted on: 2019-02-08 17:30:13

About the consultation

About you

1) Please tell us if you are responding as an individual or on behalf of an organisation or group:

Responding on behalf of an organisation or group

If you selected other, please specify:

N/A

2) What is your email address?

Your email address:

N/A

3) Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity:

Yes

If you do not want us to publish your response, you need to tell us why:

N/A

4) Please tell us how you found out about this consultation:

From the Environment Agency

Other:

Responding as an organisation or group

5) Please state the name of the organisation or group you are responding on behalf of.

Name of organisation or group:

Greater Manchester Partnership

Your views

1) Do you consider yourself or those you represent to be at risk of flooding or coastal erosion?

Yes

2) How familiar with the North West Regional Flood and Coastal Committee were you before reading this business plan?

I was very familiar with what the Committee does

3) Having read the business plan, do you have a better understanding of:

a) understanding of business plan - the role of the RFCC?

Yes

b) understanding of business plan - what we are aiming to achieve?

Yes

Please provide further information to support your answer:

This was a difficult question to answer as representing Local Authorities in Greater Manchester on this consultation I am fully aware already of what the RFCC does. The plan however is clear in what the RFCC does and how it support communities to manage flood risk.

4) In the draft business plan (pages 18 - 23) there are 12 proposed objectives. Please rank these objectives in order of importance, with 1 being the most important and 12 being the least important:

Objective ref.	Objective description	Ranking
A1	To measure, assess and improve the effectiveness and efficiency of risk management authorities' collective engagement with communities on flood and coastal erosion risk management	0
A2	To better understand the increasing risks in the North West arising from our changing climate and develop means of communicating this in order to increase communities' resilience	0
A3	To build an evidence base to demonstrate to coastal communities the likely scale of challenge faced in managing coastal erosion	0
A4	Using this evidence to begin discussing adaptation options with those communities	0
B1	To successfully deliver, build on and develop our natural flood management programme	0
B2	To develop and strengthen partners' approach to engaging, planning and managing water at catchment scale	0
B3	To agree some waterbodies which could be operated to both maintain supply and help reduce flood risk, and to implement revised or trial operating protocol on at least one	0
B4	To increase the adoption of sustainable drainage systems (SuDS) and green infrastructure on new developments and its retrofitting on existing developments	0
B5	To find more ways to enhance the environment and recreational amenity through our flood risk management programme	0
B6	To influence the future system of environmental land management payments and to make best use of the existing payments.	0
C1	To increase understanding of the multiple benefits of flood and coastal erosion risk management schemes, how to value and promote them, and develop the skills pipeline in the North West to support the timely and effective development of place-based schemes and approaches.	0
C2	To attract new partners and funding for integrated schemes, particularly from the private sector, which will reduce flood or coastal erosion risk and provide multiple benefits	0

Other comments on the priorities:

It was acknowledged that trying to rank the priorities as outlined in question 3 was difficult to achieve, as it was felt all the objectives were important. Instead of trying to rank priorities, the following feedback focuses on where indicators are missing or the emphasis or commitment should be stronger.

Economic resilience

Economic resilience is not as prominent as it could be; the hooks are there relating to unlocking growth and aligning investment as noted on page 7 but little detail to support such a step change. Whilst there are references to economic regeneration and growth within the plan, they are perhaps too limited and could be developed further. On page 22 the goal states that developers and planners should recognise the importance of flood risk and climate change adaptation and how managing them can unlock additional development, economic regeneration and growth. However the plan should identify stronger emphasis around existing infrastructure, around older and harder to reach communities as well as growth including town centres and understand better how we can embed flood risk management into these areas.

The current focus is around protecting residential properties but often many of the more deprived and hard to reach areas have business communities made up of many local SME's, often sole traders. These are often long standing local employers or service providers. With 'the plan' having such a development focus, there is little mention of business resilience especially in respect to these type of businesses. They are part of the urban fabric, are often more vulnerable and are in many cases less able to withstand the shock of flooding with lack of insurance often a contributing factor as to their inability to re-establish themselves, quickly if at all. This in turn has a social impact on the whole of the community.

Economic resilience should be more prominent in 'the plan' as contributions from private investors is very important in light of the reducing RFCC local levy pot. This funding has traditionally supported projects that otherwise would remain only partially funded and in some cases not at all. There may be more opportunities to support and align with other investment streams for regeneration and improving infrastructure.

Promoting RFCC, community engagement and addressing personal responsibility.

Page 6 of the plan makes reference to community resilience and identifies one of its principles is around involving, listening to and doing the best for communities and is expanded on pages 18 to 19. The success indicators as outlined on page 19 could be strengthened to show that there is actual behavioural change around flood resilience. Whilst online use of the Flood Hub and sign up to the flood warning service provides some insight, they do not provide a comprehensive understanding of communities' attitude to flood risk and climate change, which often requires bespoke and long-term engagement.

The plan should also explain the relationship between RFCC members and their role in linking the RFCC to communities and help promote the RFCC. As a public facing document, there should be stronger reference to education around flood resilience and climate change adaptation. The plan should acknowledge that there is a genuine need for community engagement to encourage commitment to change behaviour through bottom up grass roots action empowering others to stimulate action by local residents and businesses. The programme suggested on page 19 needs to be stronger to address personal responsibility and educate around riparian issues to understand the benefits of well-managed watercourses and local environment. Community resilience is mentioned on page 9 but more clarity around how RMA's including Local Authorities will interact with this process to get out to communities is needed.

The plan needs to place more emphasis on supporting individuals in taking a more active responsibility in managing their risks along with realistic expectation of RMA's and what the RFCC can actually do.

Communities are very different across GM to other partnerships such as Cumbria where the model advocated there is not easily replicable in GM. The plan should acknowledge and reflect the

differences across the North West and strengthen the programme to tackle hard to reach and vulnerable areas. There are examples in the Community Flood Pathfinder Programme legacy reports and ongoing community engagement priorities such as in Rochdale.

Local Authority Challenges.

The plan overall feels very EA centric even though there is reference to surface water flooding it is a little limited. There could be a stronger steer on how this will be supported in terms of flood risk management responsibilities capacity building/retention etc. There is no reference to ordinary/non-main watercourses and this is an area that the LA's are responsible for and is additional pressure to other local flood risk. There should be some understanding through the plan of the pressures and challenges on LLFA's and how the RFCC can support development of good practice in the sub regions and allows priorities around surface water and ordinary watercourses to unlock investment, for example through planning development and processes on the GM Environment Plan.

RFCC and representing/conveying key pressure and issues to Government around managing flood risk. It would be helpful for the RFCC to be more challenging around issues such as SUDS, community resilience etc.

Wider Links.

The plan could expand on the role that the CaBA approach has within flood management and how it can help facilitate multi benefit outcomes. Natural flood solutions are key contributors to long-term water management and climate change adaptation. Investment to fund these measures is difficult to find, however new innovative investment models are being identified around natural capital. This forward thinking approach is due in part to the understanding that grant funding is limited and likely to be more so in the future.

Current flood risk management thinking around funding needs to be stronger aligned to these approaches and the Catchment Partnerships otherwise an integrated approach to water management is unlikely to be achieved.

The Catchment Partnerships managing the CaBA approach are instrumental in delivery of nature based solutions on a catchment basis and there needs to be a stronger link to them through flood and coastal groups.

6) Please tell us if you are a potential partner with similar objectives and provide details of any opportunities for us to work together.

Suggestions of opportunities:

GMCA is a partner organisation and already work closely with the RFCC to ensure that opportunities to work together are identified.

Further comments

7) Please tell us if you have any further comments that have not been covered by the previous questions and provide as much information as possible to support your answer.

Any further comments:

N/A

Your feedback on this online tool

8) How satisfied were you with the tool?

Satisfied

Please tell us if you have any suggestions on how we could improve the tool:

N/A

Email Responses

Forestry Commission Response

I lead for the Forestry Commission on Natural Flood Management in the North West and West Midlands, I also sit on the North West Flood and Coastal Committee Slow the Flow Board. Thank you for the opportunity to provide our views on the draft NWRFC Business Plan. I have proposed some very small changes and we would be most grateful if they could be included. They primarily concern the section on natural flood management on page 15:

Please see suggested text changes (italics) and comment below:

Natural flood management programme

In recent years there has been a growing recognition of the role that natural processes can play in managing flood flows and coastal erosion ~~when used in conjunction with engineered flood defences~~ (1). The North West RFCC recognised it's potential and has invested Local Levy funding to explore opportunities and build partnerships to develop natural flood management.

Following the 2016 Autumn Statement, Defra announced £15 million of government funding for natural flood management projects across England. The Environment Agency, together with risk management authorities, Natural England and Forestry Commission, identified a number of projects at *small catchment scale where NFM can make a significant contribution to reducing flood risk* (2) or coastal zone scale. The progress we had already made in the North West meant that we were successful in securing £4.1m of the funding. Delivery of these projects is a top priority for the RFCC and its constituent partners.

- (1) Comment: NFM does work on its own and it is often used where engineered defences are not viable – sometimes the only option for example Stockdalewath (Ian Irvine NWRFC can describe)
- (2) Comment: key point NFM is only effective and affordable at small catchment scale ~ <100km²

The leaky dam on the front cover of the business plan is not a great example, it appears to be unsecured, in an advanced stage of decay and probably not very effective. The Forestry Commission and Forest Research advocate dams like the one attached (please feel free to use this image). They are resilient and when sited and used correctly in series pose no risk and temporarily detain significant volumes of peak flows.

Natural England Response

Planning consultation: NW Regional Flood and Coastal Committee Draft Business Plan 2019-2022 Consultation

Thank you for your consultation on the above which we received via the North West and North Wales Coastal Group on 13 December 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We welcome this opportunity to comment on the proposed Business Plan for 2019 – 2022 from the North West Regional Flood and Coastal Committee (NW RFCC). In summary Natural England supports the NW RFCC Business Plan (2019-2022) and offer the following comments in regards to the details within the plan:

We are pleased to see that the Business Plan aligns with, and has incorporated key elements of the Government's overarching 25 Year Environment Plan, this has been captured succinctly within the Vision framework (page 17). Namely increasing adoption of green infrastructure, applying a natural capital approach, increasing the use of natural flood management, supporting communities and businesses to become more aware and resilient to flood and coastal risks, and supporting coastal communities in adapting to coastal change.

We are supportive and welcome that key concepts and objective within this business plan and acknowledge that these align with Natural England's three guiding principles under our [Conservation 21 Strategy](#); creating resilient landscapes and seas, putting people at the heart of the environment and growing natural capital.

We welcome and support the call for continued monitoring of the changing environment along the coast (as highlighted on page 19) and the link with sustainable development to be able to make considered and strategic planning decisions for future developments.

The business plan acknowledges the opportunities for the environment from incorporating natural processing into managing flood risk, and that by doing so schemes can re-connect communities through the creation of green space.

Under the long term goal of enabling sustainable economic growth and investment (detailed on page 22), Natural England welcomes the ambition to fully value potential schemes, incorporating environmental, social and health, and wellbeing benefits and that by doing so the NW RFCC can diversify and seek new major partners for funding.

Page 2 We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Aurelie Bohan on the details below or telephone 02080 266127.

Merseyside Strategic Partnership Response

NORTH WEST REGIONAL FLOOD AND COASTAL COMMITTEE (RFCC) BUSINESS PLAN 2019 - 2022

I'm writing in response to the above consultation in my role as Chair of the Merseyside Flood and Coastal Erosion Risk Management (FCERM) Partnership, hereafter the Partnership which, for the purposes of this response, consists of the Lead Local Flood Authorities (LLFAs) of Knowsley Council, Sefton Council, Liverpool City Council and Wirral Council.

On the behalf of my Partnership I'd firstly like to thank the Committee for the opportunity to comment on this draft Business Plan. Our Partnership is fully supportive of the Business Plan concept and trusts this will serve the Committee and sub-regional Partnerships well in attracting increased investment from existing and new sources, in engaging our communities and in offering greater transparency and awareness of the Committee's work.

Our Partnership wishes to offer the following comments:

- 1.** The Business Plan would benefit from a clearer structure and consistent terms to tangibly demonstrate how its mission will be achieved over the timescale of the Business Plan. The document is rather text heavy and value would be added by text down into clearer and distinct sections supported by key diagrams.
- 2.** I am concerned about the timescale of the Business Plan, 2019 – 2022, and whether the mission is achievable within this, or whether the mission is a longer term ambition that this Business Plan, and future Business Plans, are working towards. Furthermore, the proposed timescale does not align well with other timescales to which the Committee and Partnerships are working towards. There would be greater value in aligning the Business Plan timescale with, for example, the timescale of the FCERM Investment Programme or Defra's 25 Year Environment Plan.
- 3.** The Partnership fully supports the move towards the 'longer term goals' and away from the previous 'RFCC Vision themes'. These new goals align well with Defra's 25 Year Environment Plan and should provide a clearer line of sight from national to regional FCERM priorities. These goals also align themselves to the universal pillars of sustainability; people, economy and environment. The use of these new goals, and their terminology within, should better support the Committee in holding discussions with wider stakeholders, such as the Liverpool City Region.
- 4.** References to the FCERM Investment Programme appear in all three of the Committee's goals and, given its significance as a core and statutory element of Committee business, the question is raised as to whether delivering and maximising the FCERM Investment Programme should be highlighted through the Business Plan as an ongoing strategic priority for the Committee. Whilst a statutory element, perhaps there is more work to do in match funding and supplementing funds in our FCERM Investment Programme with others. Indeed the Business Plan is a useful place in which to state this ambition and to challenge ourselves as a Committee as to how we could achieve this. Doing so would drive forward discussions with, for example, Local Enterprise Partnerships and Combined Authorities across our region.
- 5.** The Partnership is pleased to see that '*gaining a better understanding of surface water flood risk and how we are addressing it*' is a key priority of the Business Plan. However, I would keen for the Committee to go further than simply better understand our risk but also to prioritise investment of our Local Levy in addressing surface water flood risks. As you'll be aware, surface water flood risk in Merseyside significantly outweighs that of fluvial and coastal flood risk combined. Furthermore in a

speech in October 2018, Sir James Bevan underlined the growing concerns the Environment Agency has around managing our surface water flood risks as climate change takes hold, calling it '*the biggest flood risk of all*'. For our Partnership, it's a key area of work that we would welcome further investment in to alleviate the risk and impact of surface water flooding. What may facilitate this is a review of how the Committee allocates Local Levy funding in a way that is more equitable to sub-regional partnerships and to all flood risks in the North West.

6. I understand the Committee agreed to appoint an RFCC Member for 'Development' matters and that the role was advertised, but was unsuccessful in recruiting to, in summer 2017. A Development Member on the Committee would be a valuable addition in driving forward and supporting Local Planning Authorities and flood risk managers in delivering relevant aspects of the Business Plan, principally in relation to sustainable drainage systems. This Member would also help to address Members concerns at Committee meetings, support engagement at a strategic level with Combined Authorities with regards to their Spatial Development Strategies, help to bridge the gap with Local Planning Authorities, transport authorities and other infrastructure providers, and to better engage developers in the benefits of early and positive planning for water management to deliver multi-benefits from sustainable drainage systems on developments hereby helping to deliver on the aspirations of the 25 Year Environment Plan.

7. I am incorrectly listed on Page 30, and also on The Flood Hub, as 'Wirral Council'; I am a Councillor for Sefton Council. Given that Councillors attend the North West RFCC to represent their FCERM Partnership, consideration ought to be given as to whether Councillors listed in the photograph are listed as per their Local Authority or as per their FCERM Partnership.

8. I must applaud and thank the Committee for its fantastic work in developing The Flood Hub. There is a real opportunity for us, as a Committee and as FCERM Partnerships, to increase awareness and importance of our work via this website. I look forward to continuing to support our Flood Hub. I trust that this response is constructive in progressing the draft Business Plan into its final form. If you require any clarification please don't hesitate to contact me.

I trust that this response is constructive in progressing the draft Business Plan into its final form. If you require any clarification please don't hesitate to contact me.

As a Partnership we look forward to receiving your final Business Plan and providing strategic direction at a sub-regional Merseyside level so that our plan, where possible, aligns with the ambitions of the North West RFCC

The Institution of Civil Engineers (North West Region) Response

Draft Business Plan 2019-2022

The ICE has over 6,000 members in the North West Region, many of whom are involved in the field of flood risk and/or shoreline management, working for the Environment Agency, Lead Flood and Coastal Risk Management Authorities or for Consultants/Contractors that have expertise in this field.

The NWRFC clearly plays an important role, not only financially, in supporting delivery of schemes that reduce the risk of flooding to communities in the North West and the draft plan clearly lays out how this will be achieved as well as identifying specific areas where it sees action as being required. The ICE North West is supportive of the overall aims and objectives of the NWRFC Business Plan.

There are however other important aspects of future FCERM that we believe should be identified, developed further or at the least acknowledged, in the Business Plan. The specific areas identified are:

- Integration of shoreline/catchment management with land use planning;
- Improvement in partnership funding contributions;
- Compensation to landowners impacted by flooding and/or erosion;
- Management of risk to elements other than residential/commercial properties e.g. landfill sites;
- Extension of Flood Hub

Land Use Planning

The draft Business Plan references Shoreline Management Plans and the policies they set for future management of our coastline but one of the main issues is that the timescales for SMPs or CMPs is that they are working to totally different timescales (typically 50-100 years) to land use plans (5-10 years). The latter need to take not only account of the policies that the SMP is proposing but also there needs to be recognition of the timescales and the work required to implement policies, particularly when this may involve adaption, modifications to communities etc. due to the impacts of climate change. Whilst this may not be directly relevant to the period of the Business Plan, we would suggest that a marker should be put down in this respect. The one reference to Planners in the Draft focuses on “unlocking additional development, economic regeneration and growth potential” and there is no reference to some of the issues that will need to be faced and how in some cases attitudes e.g. to assumed protection, are going to have change and difficult decisions will have to be made.

Partnership Funding

With only a limited budget available to support flood and erosion risk reduction measures it is important that what money there is, is used wisely and the partnership funding arrangements currently in place have provided opportunities for pooling of financial resources to enable schemes that might otherwise not be funded to progress. However, it is apparent that the partnership funding that supports schemes quite often comes from other local government funding rather than from businesses that are receiving benefits of reduced flood or erosion risk e.g. the proposed flood defence at West Kirby on the Wirral is being funded by FDGiA supported by NWRFC local levy contribution with the balance being obtained from the Council’s highways budget. Whilst this is good it is not necessarily fully in the spirit of the idea and we are of the opinion that in the future there needs to be more emphasis placed on obtaining money from commercial/corporate entities whose businesses benefit from the investment in flood and erosion risk measures. We would suggest that there is some reference to this in the Business Plan.

Compensation for Landowners

The issue of compensation for landowners whose properties are lost to coastal erosion or where the frequency of flooding is so great that it no longer becomes viable to remain has been talked about for a number of years but present government policy is that there is no guarantee of compensation for landowners. Whilst it is right not to use public money to erect new defences or maintain existing defences to frontages where it is clearly not economically viable and sustainable to do so, it could be argued that there is a moral case to re-consider the policy of no compensation, particularly for those who have lived in properties since before climate change was accepted as an issue. If owners bought properties when information was available to allow them to make an informed decision about whether to proceed or not, then that would be a different case. With future climate change then compensation should be in the mix when talking about future adaptation measures and reference to future discussions with government would appropriately be included when talking about long term goals about adapting to climate change.

Management of risk to elements other than residential/commercial properties

The focus of on-going FCERM is quite rightly about protecting people and property. However, there are other issues associated with coastal erosion where future behaviour could have a long term impact on the environment. There are a number of frontages in the North West where there are landfill sites or areas where the legacy of past industrial actions present a potential pollution risk along the shoreline, which will increase in time e.g. Walney Island, between Harrington and Maryport in Cumbria. Securing funds to protect these shorelines or deal with the potential pollution as a result of on-going erosion, particularly when private operators are not involved, is a clear challenge as such schemes do not score highly for traditional outcome measures. Again, we would welcome some reference to supporting development of measures/approaches that address risks from coastal erosion and, where appropriate, flooding when there are risks to elements other than people and property.

Extension of Flood Hub

The Flood Hub provides an excellent resource for FCERM managers and the ICE North West is supportive of its on-going development. At the present time the resource appears to be very much fluvially based with less reference to risks of flooding or erosion along the coast e.g. in case studies. We would like to see more reference to the risks along the coast, which can be different in nature to those experienced in riverine locations but equally devastating.