

## **Appendix 2: Consultation report for draft LFRMS 2016 – 2026**

### *Executive Summary*

Following the six week consultation period between 29 February and 10 April 2016, a total of 39 responses were received. Two thirds of respondents used the consultation survey; however an additional 15 open responses were received via letter and email. The greatest numbers of responses were received from Town and Parish Councils (26%) and voluntary groups (23%).

Response to the draft strategy was largely positive, with levels of disagreement below 20%. The headline results are as follows:

- The language and structure were found to be accessible (81% agreed it was easy to follow).
- Explanation of the different sources of flooding was clear (over two thirds (71%) were in agreement).
- Comments received on the Sustainable Drainage Systems (SuDS) guidance were positive, with Local Planning Authorities particularly welcoming the provision of standard advice.
- One third (33%) of respondents did not feel that the strategy helped to clarify flood risk in East Sussex.
- A quarter (26%) of respondents felt that further clarification and guidance could be provided regarding on homeowner responsibilities for flood protection and maintenance.

One local authority provided the majority of adverse comments, and formed a large part of the reported 20% levels of disagreement.

The responses outlined a number of suggested inclusions and additional comments. These focused on standing advice for SuDS (16%) and delivery of the strategy (13%), reflecting the large number of district, borough, and local councils which submitted written comments. Suggested inclusions are outlined in section f) of this report, and an overview of all written comments can be found in Agenda Item 4.

Although many detailed comments were received, no fundamental changes were identified within the strategy and its technical appendices.

Valuable feedback was also received during table discussions with technical stakeholders at the consultation launch event on 3 March 2016, and was taken into consideration for the final strategy.

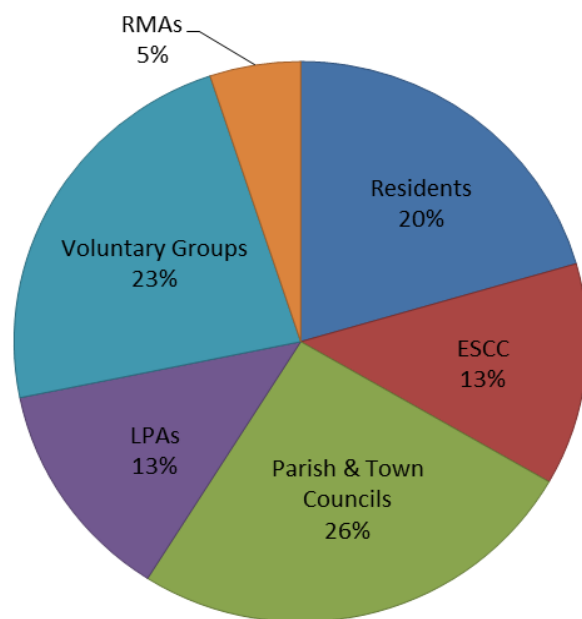
## The Consultation Process

The consultation process aimed to determine whether the draft strategy was accessible, and provided a sufficient level of guidance to homeowners, planners and developers.

A copy of the consultation survey is included in Appendix A; and the questions were grouped into the following topics:

- a) **Accessibility of language and structure of the strategy**
- b) **Indication of flood risk in East Sussex**
- c) **Guiding Principle**
- d) **Individual responsibilities for protecting property and maintaining drainage assets**
- e) **Standing advice to developers and planners on SuDS**
- f) **Omissions and further comments**

Of the 39 consultation responses received, over two thirds (69%) were submitted using the consultation survey (largely via the Council's online consultation portal) whereas the remainder were open responses, sent by email or letter. The breakdown of all consultation respondents is outlined in Figure 1.



**Figure 1:** Breakdown of all 39 consultation responses by respondent

## Findings

The following respondent statistics are based on the consultation survey responses alone; however are supported by additional written comments and open responses.

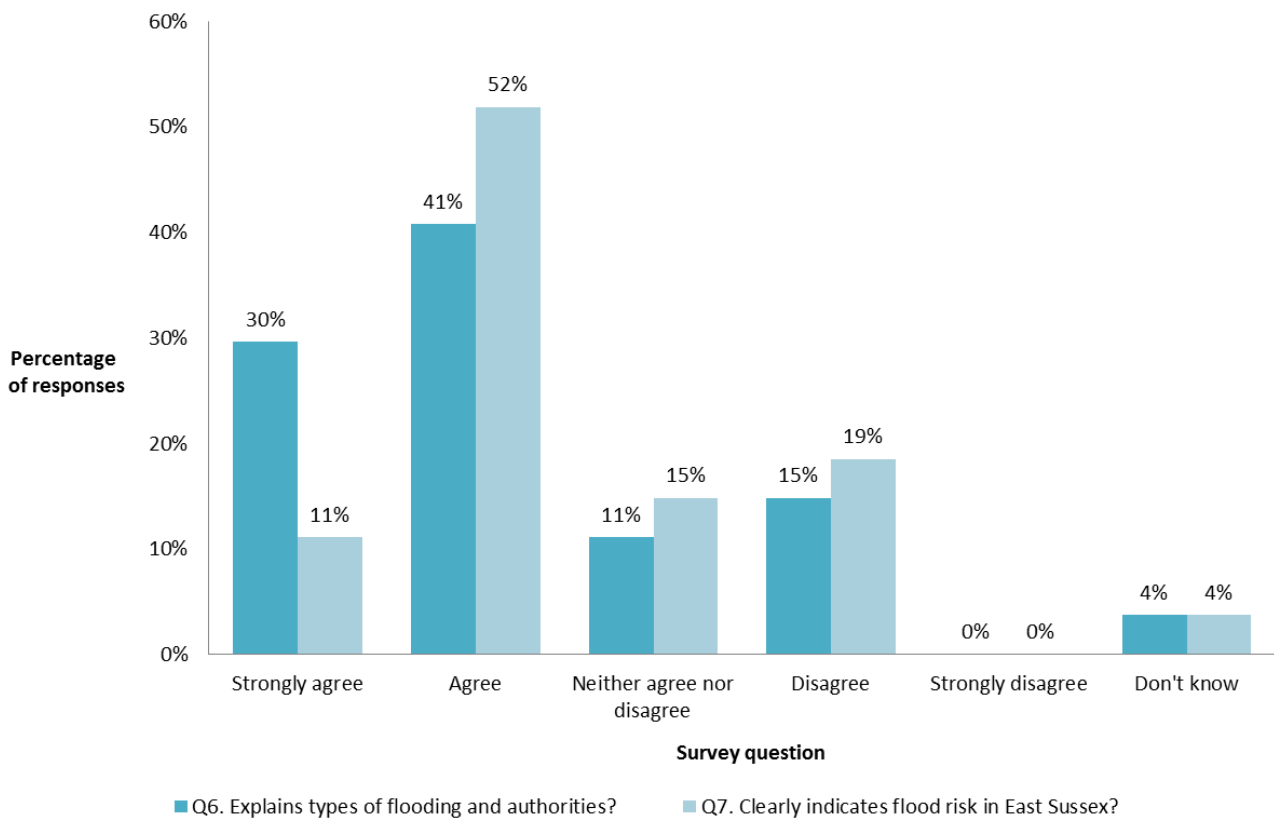
### *a) Language and Structure*

To cater for the range of audiences which might use the strategy, the document requires accessible language and a clear structure.

- Over three quarters of respondents found the document either easy or very easy to understand (78%) and to follow (81%), as reflected in the majority of written comments: *'it is very clearly written and easy to understand'*.
- However around one tenth (11%) of respondents found the strategy difficult to understand, with the document length stated as the main reason (5 responses): *'Fairly easy to follow but very long.'*

b) *Flood Risk in East Sussex*

Clarifying the different sources of flooding, the relevant management authorities and the county-wide flood risk, aimed to increase understanding of flood risk in East Sussex.



**Figure 2:** Responses for Q6 and 7 of the consultation survey, regarding the types of flooding and flood risk in East Sussex.

- Over two thirds (71%) of respondents strongly agreed that the types of flooding and authorities responsible were well explained: *'will aid all stakeholders having a greater understanding of the role of the Lead Local Flood Authority'*.
- Approximately one quarter (26%) either disagreed or answered 'neither agree nor disagree', as they felt aspects were missing: *'some of the minor aspects are omitted i.e. the role of internal drainage boards'*.

- Approximately two thirds (63%) agreed that the strategy gave a clear indication of flood risk: *'This exercise is useful for comparative purposes across East Sussex'*.
- However one third (33%) either disagreed or answered 'neither agree nor disagree'. Reasons provided were:
  - The focus on areas of high population does not sufficiently represent rural or local flooding issues: *'It is also very focused on the main urbanised areas'; 'I believe that the problems in Ringmer are ignored'*.
  - It does not include impacts of flooding on transport links and infrastructure: *'impacted by flooding...through being cut off from the county through inaccessible roads'*.

#### c) Guiding Principle

As the Guiding Principle underpins the strategy, and determines the objectives and strategic priorities, agreement of its wording was important.

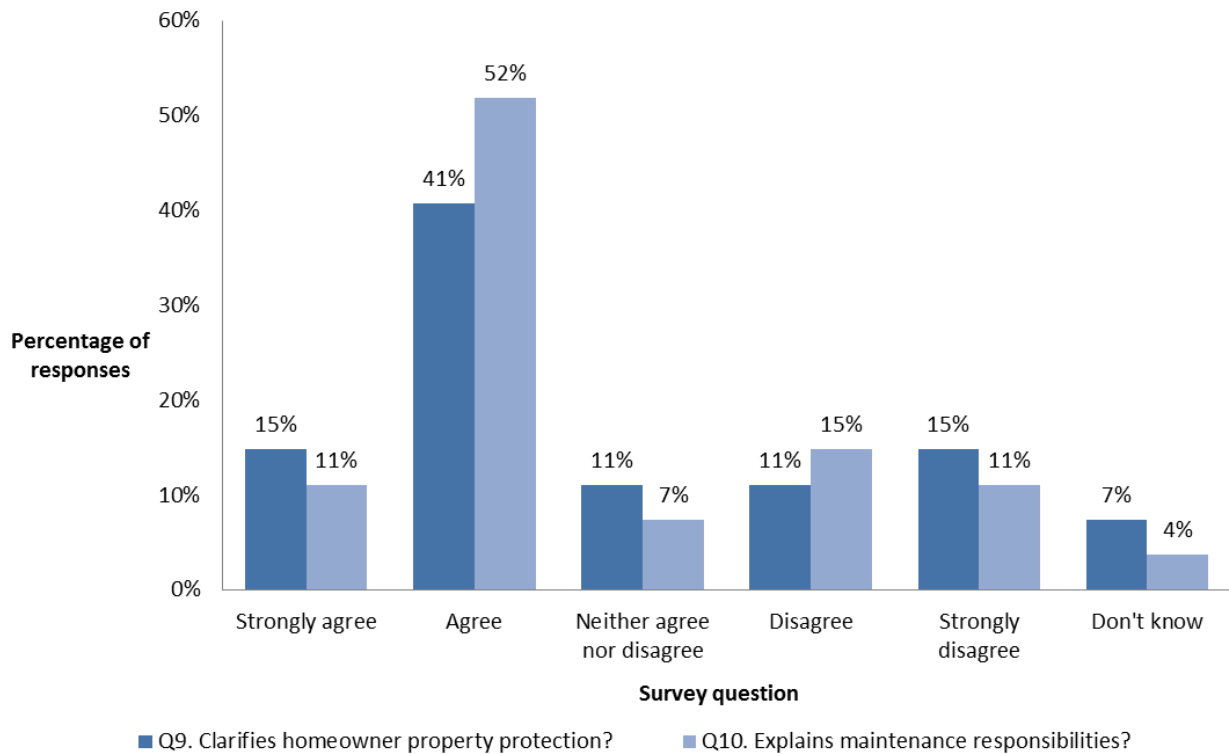
- Over two thirds (70%) of respondents agreed or strongly agreed with the strategy's guiding principle: *'The guiding principle...is a reasonable principle'*.
- Whereas one quarter (26%) either disagreed or answered 'neither agree nor disagree' as they felt it could be stronger: *'rather flaccid objective', 'concerned that the Strategy is not strong ... enough'*.

#### d) Homeowner responsibilities

The information on riparian ownership and homeowner responsibilities was intended to equip homeowners with the necessary information to increase their resilience to flooding.

- Just over half (56%) of respondents agreed or strongly agreed that the strategy clarified homeowner responsibilities to protect their property.
- A quarter (26%) disagreed or strongly disagreed, with a consensus that clarification and more advice could be provided: *'probably needs clearer articulation...whom homeowners can turn for advice', 'what types of action they...are expected to take to protect their properties'*.
- Approximately two thirds (63%) of respondents agreed or strongly agreed that the strategy clearly explained responsibilities for maintaining watercourses and drainage assets.
- A quarter (26%) disagreed or strongly disagreed, with opinion split on whether too much or too little onus for maintenance was being placed on landowners: *'puts too much responsibility on individual landowners'; 'important to place more emphasis on residents/landowner's responsibilities'*.

- Written responses identified some of the constraints with riparian ownership (cost, capacity, enforcement) and suggested more collaborative maintenance: *‘encourage ESCC to consider promoting ways to enable... more novel ways of delivering maintenance services’*



**Figure 3:** Responses for Q9 and 10 of the consultation survey, regarding homeowner responsibilities for flood protection and asset maintenance.

#### e) SuDS Standing Advice

This guidance was targeted towards planners and developers, to inform the design of drainage systems and reviews of development proposals.

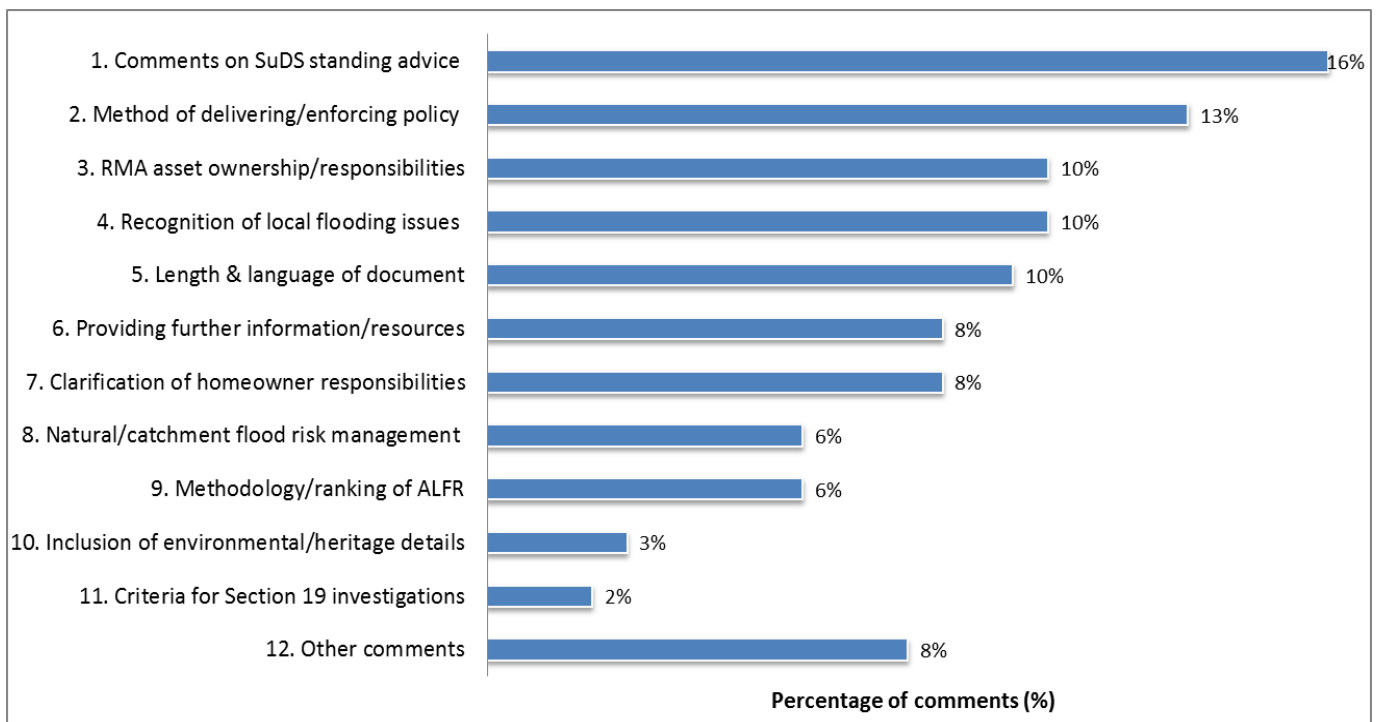
- Around two fifths (44%) of respondents agreed or strongly agreed that the level of SuDS standing advice was sufficient. Responses from planning authorities welcomed the inclusion of the advice: *‘We welcome particularly the increased emphasis on SUDS’*; *‘is likely to be particularly useful at the pre-application engagement stage’*, *‘considering reflecting the DRAs in Local Plan policy’*.
- Some respondents raised concerns over enforcement of the advice, and its focus on new developments (e.g. excludes extensions): *‘feels this needs to be properly enforced’*; *‘SuDS should be expanded to apply to any development’*.
- Two thirds (62%) answered ‘neither agree nor disagree’ and 15% answered ‘Don’t know’, perhaps reflecting the technical nature of the guidance.

*f) Omissions and further comments*

The majority of consultation survey responses included additional written comments, and fifteen open responses were received from local councils or organisations.

Additional and open comments were classified into 12 themes to allow quantitative analysis (Figure 2), with detailed responses often touching upon several themes.

Full details of the written comments received, and the suggested actions resulting from them, are outlined in Agenda Item 4.



**Figure 4:** The key themes raised in additional comments and open responses, ordered by percentage of responses. 'Other comments' were statements which did not identify any particular views or issues to be considered.

Respondents were also encouraged to detail any aspects which they felt had been omitted from the strategy. Comments fell into the following themes:

- Catchment-scale and natural flood risk management **(4 responses)**
- Coastal flooding and management **(2 responses)**
- Other factors the methodology of the Assessment of Local Flood Risk (e.g. infrastructure, flood risk beyond county boundary) **(4 responses)**
- Information from other authorities/ sources e.g. EA flood maps **(3 responses)**
- Addressing the potential failure to meet responsibilities/implement the strategy **(2 responses)**
- Details of local flooding issues **(1 response)**
- Details of Highways maintenance and flooding **(2 responses)**

## Conclusions

From the information gathered during the consultation process it can be concluded that:

- Response to the strategy was generally positive, with levels of disagreement remaining below 20%.
- It was found to be accessible in language and structure, with 81% of respondents finding the document easy to follow.
- Explanation of the different sources of flooding was shown to be clear, with over two thirds (71%) of respondents in agreement.
- The SuDS standing advice was generally well received, with Local Planning Authorities welcoming the focus on development. However perhaps due to the technical nature of the guidance, two thirds of respondents (62%) were unable to comment on its suitability.
- A quarter (26%) of respondents felt that clarification and further guidance could be provided regarding on homeowner responsibilities for flood protection and maintenance.
- One third (33%) of respondents did not feel that localised or rural flooding issues were not sufficiently represented in the strategy. Although it is not possible to provide details of all flooding issues in the county, differences in expressing this section could be considered.
- Additional comments and open responses focused on standing advice for SuDS (16%) and delivery of the strategy (13%), which reflects the large number of district, borough, and local councils which submitted written comments.
- Although many detailed comments were received, no fundamental changes were identified with the strategy and its technical appendices. Suggested changes have been analysed in more detail in Agenda Item 4 to identify how they can be taken forward within the final strategy documents.
- One local authority provided adverse comment on all aspects of the strategy. This was of considerable concern, and required further discussion with the authority involved.

## **Appendix A: Consultation Survey Questions for Draft LFRMS 2016-2026**

### **Introduction**

- 1. What is your name?**
- 2. What is your email address?**
- 3. What is your organisation?**

### **Section 1 - Language and structure**

- 4. How easy did you find it to understand the Strategy?**

(Very easy, Easy, Neither easy nor difficult, Difficult, Very difficult, Don't know)

**If you felt the document was difficult or very difficult to understand, please tell us why.**

- 5. How easy was it to follow the structure of the Strategy?**

(Very easy, Easy, Neither easy nor difficult, Difficult, Very difficult, Don't know)

**If you found the document difficult or very difficult to follow, please tell us why:**

### **Section 2 – Flood Risk in East Sussex**

- 6. Does the strategy clearly explain the different types of flooding and which authorities have a role in managing it?**

(Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, Don't know)

**If you disagree or strongly disagree, please tell us why:**

- 7. Does the strategy give a clear indication of flood risk in East Sussex?**

(Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, Don't know)

**If you disagree or strongly disagree, please tell us why:**

### **Section 3 - Guiding Principle of the Strategy**

- 8. Do you agree or disagree with the strategy's guiding principle?**

(Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, Don't know)



**If you disagree or strongly disagree, please tell us why:**

#### **Section 4 – The Strategy**

**9. Does the Strategy clarify the responsibilities of a homeowner to protect their property from flooding?**

(Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, Don't know)

**If you disagree or strongly disagree, please tell us why:**

**10. Does the Strategy clearly explain the responsibilities for maintaining watercourses and drainage assets?**

(Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, Don't know)

**If you disagree or strongly disagree, please tell us why:**

**11. Do you feel the level of standing advice on Sustainable Drainage Systems (SuDS) provided in the Strategy is sufficient to assist developers and planning authorities?**

(Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, Don't know)

**If you disagree or strongly disagree, please tell us why:**

#### **Section 5 – Additional Information**

**12. Is there anything which has not been included in the strategy, which you feel should be?**

**13. Do you have any other comments on the strategy?**

**14. Would you be happy for us to contact you if we need more information about your response?**

(Yes, No)