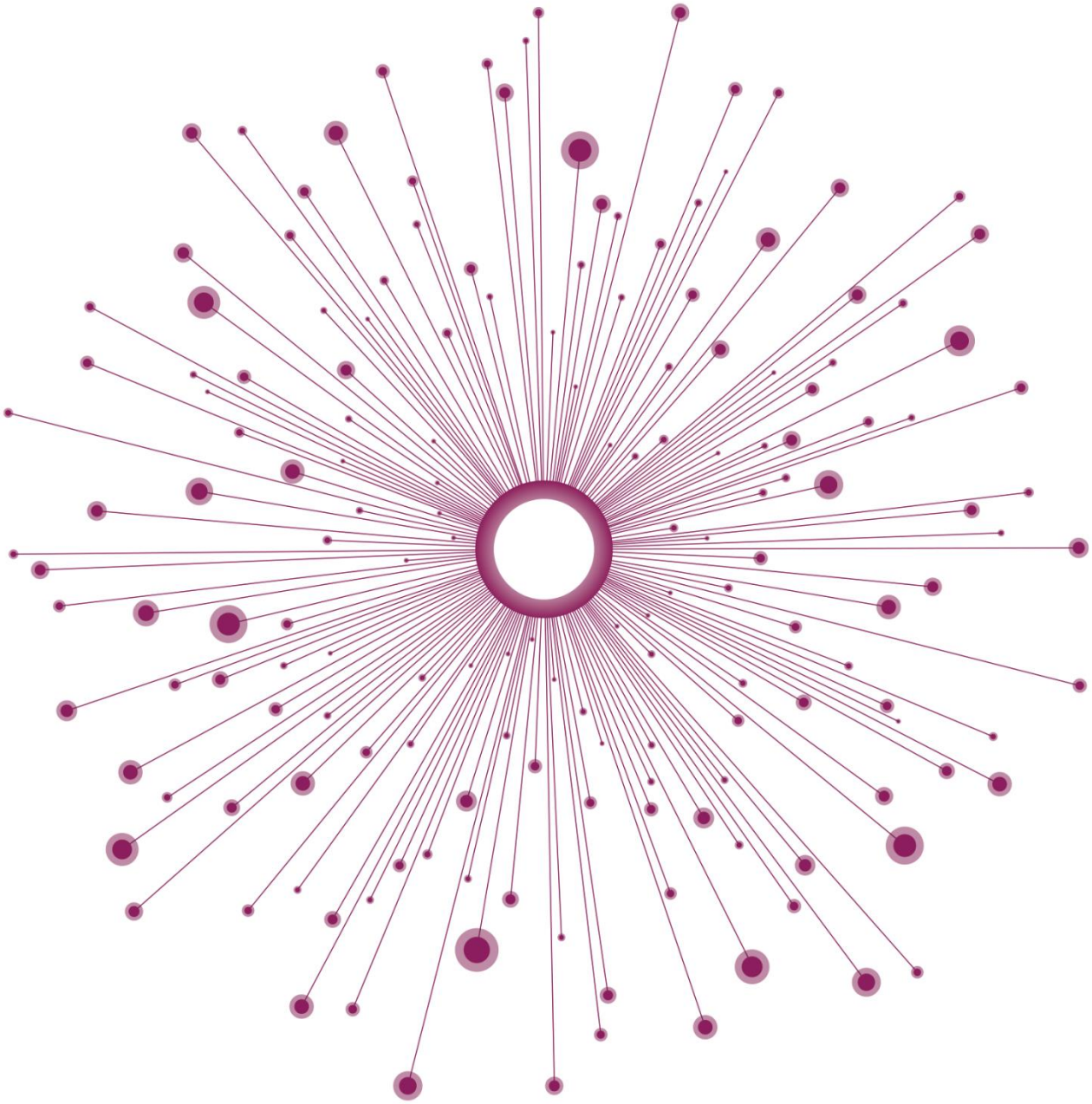
Lancashire Flood Risk Management Strategy Consultation: Data Analysis

April 2021



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1. Summary and Recommendations

General Comments

- The crucial part of the strategy is the vision, themes and actions. These were the most understood and welcomed parts of the document, suggesting broad consensus amongst respondents over the direction. A number of additional suggestions were made across the rest of the consultation exercise which reflected a lack of clarity from some respondents to aspects of the document;
- The team responsible for developing the strategy should develop a response to the points raised in this report, to be published alongside the revised strategy.
- Individuals responding to the survey were a lot less likely to be clear on questions requiring factual knowledge than those responding on behalf of an organisation.

Definition and roles

- Whilst the majority of respondents felt that the definition of "local flood risk" was clear, respondents highlighted that this would not be the case for the general public;
- A majority of respondents felt that the diagram explaining the roles and responsibilities of the flood risk management authorities was clear, but the total proportion was lower than those who found the definition of "local flood risk" clear.

Legislative and Strategic Framework

- Just under half of respondents felt that the relevant legislation was included, but many did not feel in a position to comment, and two suggested specific acts of parliament;
- Slightly fewer respondents than the above question said they agreed that relevant assessments and plans were included, and a significant amount of suggestions were made about others which could be included, such as waste plans and local plans;
- Whilst over half of respondents felt that the descriptions of individual responsibilities and the governance involved was clear, it was evident from the comments that there was confusion over the diagram and how it related to the governance process;
- Although over half respondents commented that the strategy referenced all of the other groups that the Flood Risk Management Authorities would work with, 21 specific suggestions were received on other organisations;
- Fewer than half of respondents felt insufficiently informed to suggest additional funding sources

Local Risks and Challenges

- The top flood risks identified were:
    - Drainage Infrastructure aging and at capacity (109)
    - Increasing local flood risks as a result of climate change (78)
    - Predominant surface water flood risk (76)

  All of these are already included in the action plan, suggesting no further changes are needed, although a review of the detailed comments may highlight useful additions;
- Four challenges to flood risk management were identified as being more important than the other options:
    - Regulation and maintenance of watercourses (104)

- Developing and retaining flood risk professionals for Lancashire (64)
- Long-term sustainability of pumped catchments (55)
- Public awareness of and resilience to flood and coastal risks (52)

Opportunities

- The main opportunities to improve flood risk management identified from the options given were more numerous than in the "risks and challenges" question:
  - More effective and integrated working between flood risk management authorities to alleviate issues (90)
  - More resources to regulate local flood risk, including on private land (86)
  - Funding bids for flood alleviation schemes are prioritised (69)
  - Greater education, awareness and understanding of local flood risks is needed (49)
  - Property level protection measures (41)

Vision and Aims

- Just under half of respondents agreed that the vision fits with the national strategy, with 8 disagreeing. Whilst this is positive, a substantial number of comments suggested ways in which the vision could be changed. These should be considered in detail for their fit with the strategic direction suggested by the evidence base;
- Over 60% of respondents agreed that there was a fit between local themes and national ambitions, with this relatively high figure potentially reflecting that these were more easily interpreted and understood than questions of governance and technical definitions. The comments received were diverse, only being made by one or two respondents. This potentially suggests that they reflect personal interests and that the local themes do not require as much additional consideration as other aspects of the strategy;
- Similarly, nearly ¾ of respondents agreed to some extent that they agreed with the vision and themes of the strategy, again suggesting that these were broadly welcomed and comprehensive.

Actions

- The diversity of suggestions made about contents of the action plan should feed into a review of the action plan by the Lead Local Flood Authorities as part of the post-consultation review of the strategy.

Updating the Strategy

- There was clear support (49%) for quarterly monitoring of the strategy by the partnership and the production of an annual report, and this should be actioned;
- There was resounding support (85%) for a review of the strategy taking place after 3 years, and this should be built into the action plan.

Recommendations

- The team intends to produce a non-technical summary document to assist the general public in understanding and interpreting the strategy. This should take account of the comments made regarding the terminology used and diagrams included in the strategy;
- To evidence consideration of the consultation responses, the team should produce a document which outlines key themes and points, whether these will be addressed and why this position was reached

2. Methodology

This consultation exercise addresses the legal requirement on the Lead Authorities on the Strategy (Blackpool, Blackburn with Darwen and Lancashire Councils) to engage with stakeholders and the public on the content of the Local Flood Risk Management Strategy. The survey was undertaken wholly online due to the national lockdown imposed in response to the Coronavirus pandemic, with an option to request a hard copy if needed.

The survey questions were based on a scope developed by the three officers from the Lead Authorities. This included a draft questionnaire covering most aspects of the strategy. This was refined to remove questions of less direct relevance to the vision, strategy and delivery of the strategy, improve the flow of the survey and ensure a balanced approach.

The survey (see Appendix A) included a web link to the draft strategy, but also included all of the salient information so that respondents could respond in an informed way without needing to commit to reading the full strategy. Some information, such as local district profiles, were omitted as these were contextual and not open to discussion as part of the scope of this exercise. There are instances where respondents have called for more information that may already be provided in the strategy itself. The questionnaire mostly followed the format and content of the strategy, dealing with each aspect of the document consecutively, although some topics and questions were combined to shorten the survey. This report summarises the responses to each question asked.

The three lead authorities undertook promotion of the survey via a press release to local media, regular posts on social media accounts, and through targeted distribution of the survey link to key stakeholders, with reminder emails as necessary.

169 responses were submitted from **February 12 to March 19 2021**. This includes 25 partial responses. Partial responses include surveys that people had saved their responses to but not returned to complete and submit the form, and surveys that people had partially completed then navigated away from the web page. These are included in this analysis.

6 further responses were received where the respondent did not complete the questionnaire but chose to comment in an open-ended fashion. These were all on behalf of stakeholder organisations or from individuals working with in them, with several including supplementary information or relevant documents. Due to the need for these to be considered on their own terms, they are not covered in the analysis below. The emails and accompanying documentation have been supplied to the team and should be treated in the same way as the literal comments from survey respondents.

Note that percentage totals may not sum to 100% due to rounding.

The role of this report

This report provides an overview of common issues identified by respondents. Inevitably, in a consultation on a technical document, many of the respondents had clearly made significant time and effort to offer challenges and suggestions not picked up in the grouping of responses. A spreadsheet including verbatim comments (redacted to remove information which could identify individuals, offensive or libellous statements, and profanities) is provided as Appendix B. To comply with consultation practice and principles, it is strongly recommended that Subject Matter Experts

review these comments to see whether there are implications for the detail of the strategy, and develop a position to be shared with the revised strategy.

Who responded?

From identified respondents, 35 responses (20.8%) were responses on behalf of organisations and 133 responses (79.2%) were from individuals. Detailed analysis of the data shows that, for more than half of the questions asked, 100% of those saying that they did not feel in a position to comment, or who responded that they didn't understand the issue, were individuals, with the remaining questions also seeing a very high proportion of individuals saying similar. This reflects the technical nature of the document.

98 of the individual respondents were homeowners (79%), 11 responses were from councillors (8.9%), 4 responses from landowners/farmers (3.2%) and 3 responses were from RFCC (Regional Flood and Coast Committee) members (2.4%).

From 124 responses made by individuals, 117 respondents (94.4%) stated they were a Lancashire resident and 37 (29.8%) stated their property had been affected by flooding.

Responses by the type of organisation and role of those with their organisations are shown in the charts below:

Figure 1: Response by organisation

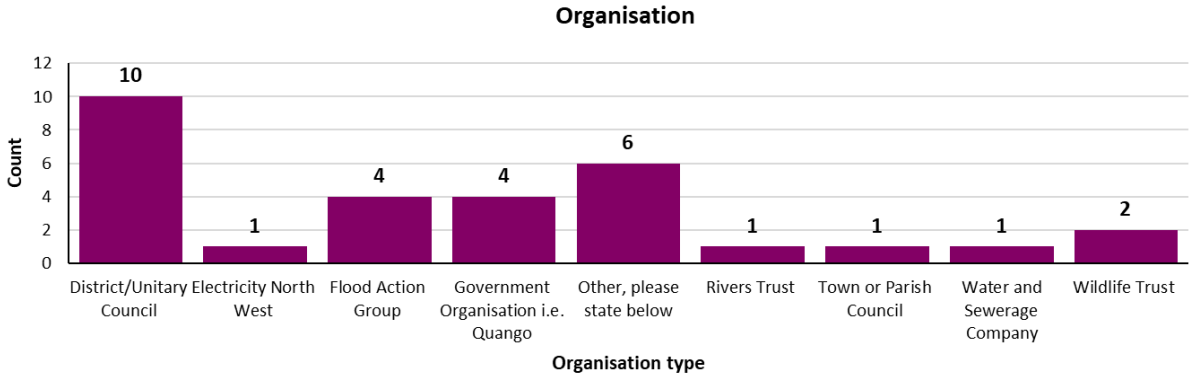
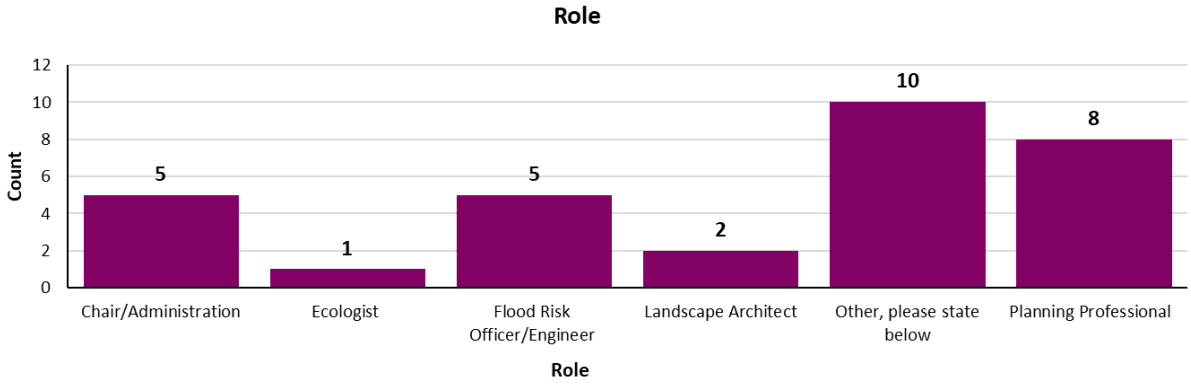


Figure 2: Response by role



3. Results

Definition and roles

The first section of the questionnaire looked at the definitions of the problems being addressed and the roles of agencies involved.

Question 1 presented a definition of the local flood risk. 19% of respondents felt this was "very clear" and 57% felt it was "clear", whilst a total of 13% felt it was "unclear" or "very unclear".

When asked to explain why the explanation of "local" sources of flooding was "unclear" or "very unclear", excluding "no, N/A and not applicable" comments, 24 comments highlighted the following issues:

- 8 comments suggested the definition was vague, particularly to those who were not professionals/experts in this area, including the highlighting of "ordinary watercourse" as a term which was unclear;
- 7 comments focused on the explanation of risk, including wanting more information around the mitigation of risk and how the risk of flooding is presented;
- Other comments focused on language needing to be simplified and further clarification being needed in the strategy, including four comments that made reference to the following question.

Question 2 referred to a diagram included in the strategy which showed the responsibilities of various agencies around flooding and the way in which they related to each other. 14% felt this was "very clear" and 53% "clear", slightly fewer than in question 1. 22% felt it was "unclear" or "very unclear", with 40 comments received:

- 20 comments said that the role and responsibility of bodies needed further clarification;
- 7 suggested that definitions should be included within the diagram (with several again querying what an "ordinary watercourse" was);
- 5 said that the diagram itself was visually unclear, with a further two taking a negative view of the diagram;
- 4 queried the inclusion/exclusion of organisations on the diagram;
- The other comments were not directly relevant to the question.

Legislative and Strategic Framework

The next section looked at the context within which the strategy was being delivered, and explored whether the draft document had adequately accounted for the legal framework and networks within which the lead authorities operate.

Question 3 asked whether the strategy covered all of the legislation relevant to local flood risk management. 47% agreed, 15% said it "somewhat" covered the legislation, whilst 7% said it did not and a further 31% did not know, or were unsure.

Of those expressing reservations, 34 commented in more detail:

- 11 made general comments about their individual circumstances or other observations which were not directly applicable;

- 10 highlighted specific legislation being "missing" or not explained clearly, with two suggesting specific acts of parliament;
- Other comments were of a more general nature or suggested that the respondent wasn't in a position to comment on the legislation included.

Question 4 asked whether the strategy covered all of the relevant assessments and plans. 41% agreed, 22% said it "somewhat" covered them, with 8% saying "no" and 30% not knowing or being unsure.

40 made further comments:

- 19 made comments which were not applicable to the question. Of those with more general relevance, some suggested the strategy was not relevant to real world outcomes, or that roles and responsibilities were unclear;
- 18 suggested specific additional local plans, or wanted further explanation of the assessments;
- 3 said they lacked knowledge on this topic or that the terminology used was unclear.

Questions 5 and 6 presented some definitions of parties with a specific responsibility around flood management, and a diagram of governance arrangements. It is worth noting that the presentation of the questions appears to have affected responses, with some respondents considering both questions together when making comments. 13% said that the explanation of the role of individuals and communities was "very clear", with 54% saying it was "clear". A total of 17% felt it was "unclear" or "very unclear".

24 made further comments around the role of communities, but these mostly related to governance. 8 cited that the relationships between the groups were unclear (which refers to the governance diagram), 8 said that the input or accountability of individuals or organisations was unclear, 4 referred to the diagram being unclear (again, a reference to the governance diagram), with the other comments being more general in nature.

57% of respondents answered that the governance explanation was clear, with 22% saying it was "somewhat" clear and 11% saying "no". Of the 31 respondents choosing to explain their answers, 10 cited that the relationships between the groups were unclear (some of which refers to the governance diagram), 6 cited the language used, and a further 3 called for more information on the responsibilities of each party involved.

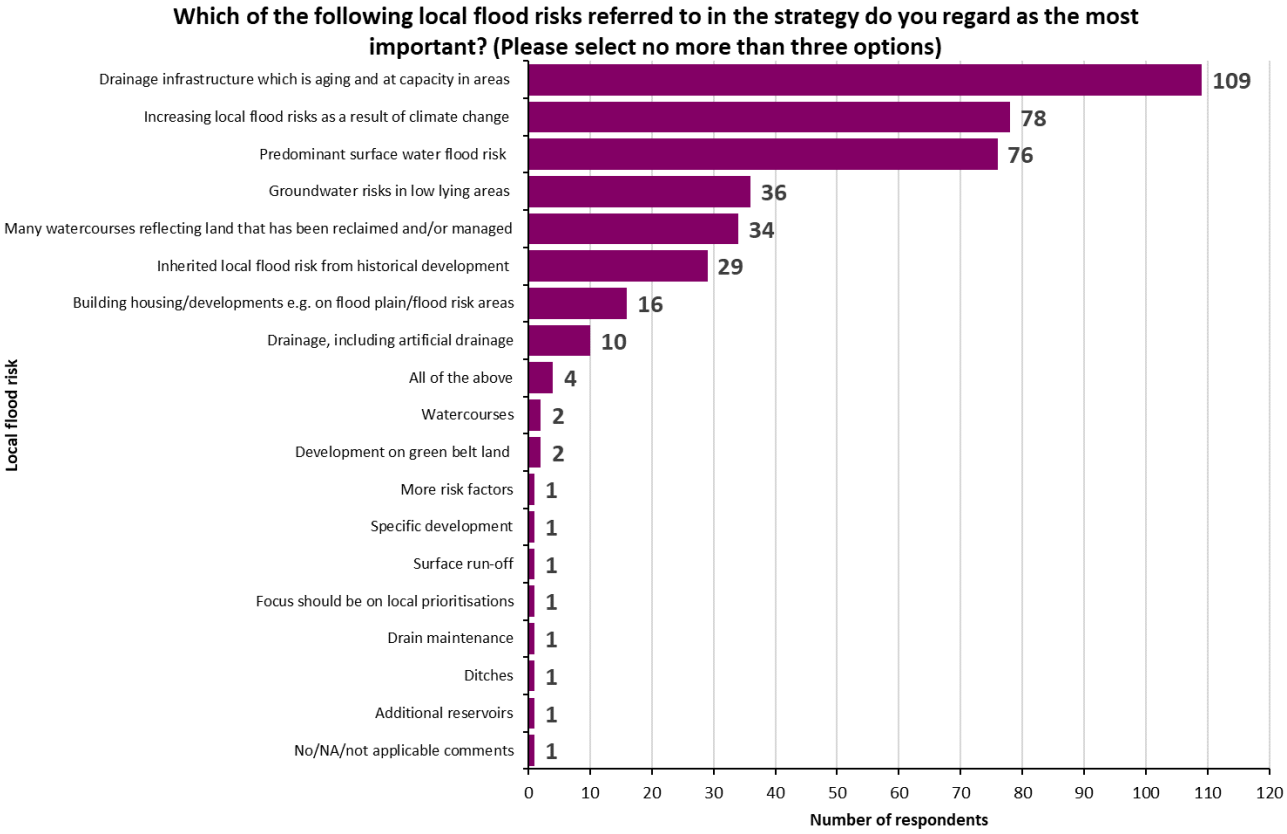
Question 7 presented details of partner organisations for consideration and asked whether this was comprehensive. 56% said it was, with 17% saying it was not, and 27% being unsure. 34 comments were received, with 21 suggesting specific organisations and 4 stating it was unclear, whilst other comments covered issues which were not applicable or less relevant to the question.

Question 8 asked about sources of funding for risk management. This was the question in this section which respondents felt least informed to make a response on, with 45% feeling unable to comment, and just 43% saying yes (i.e. that the list provided covered all funding sources). 29 comments were received, of which 16 referenced specific or general sources of funding.

Local Risks & Challenges

This section considered some of the practical issues with delivering local risk management.

Figure 3 below covers **Question 8c** on the local flood risks referred to in the strategy that respondents regarded as the most important, based on the selection of three options each, and shows a clear distinction between the top three responses and other answers:

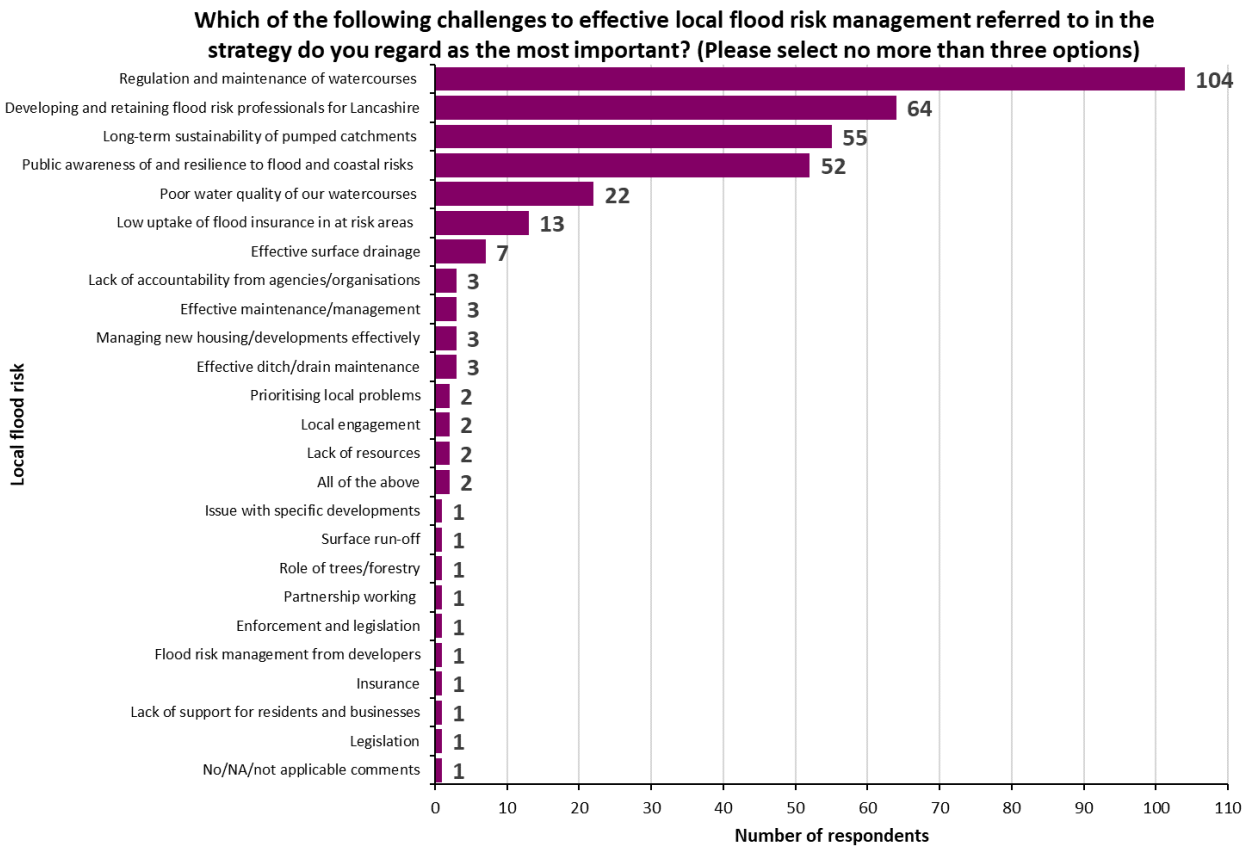


In addition, 39 comments were received making various observations, including from respondents who had ticked “other”:

- 16 commented on housing developments, for example building on flood plains, and a further 2 around development on green belt land;
- 10 suggested drainage, including artificial drainage, with a further comment around drain maintenance;
- Other comments tended to be more diverse or not directly relevant to the question.

Question 8e then asked respondents to consider the challenges involved in effective flood risk management, which is shown in **Figure 4** (overleaf). In this case, four of the available options are clearly considered as more important to the other potential responses.

36 further comments were received, with the level of diversity in these meaning that many suggestions were categorised individually or only with one other response. Of the most numerous, 7 cited effective surface drainage, with 3 respondents citing each of the following: Managing new housing/developments effectively, effective maintenance and management in general, and lack of accountability from agencies and organisations.

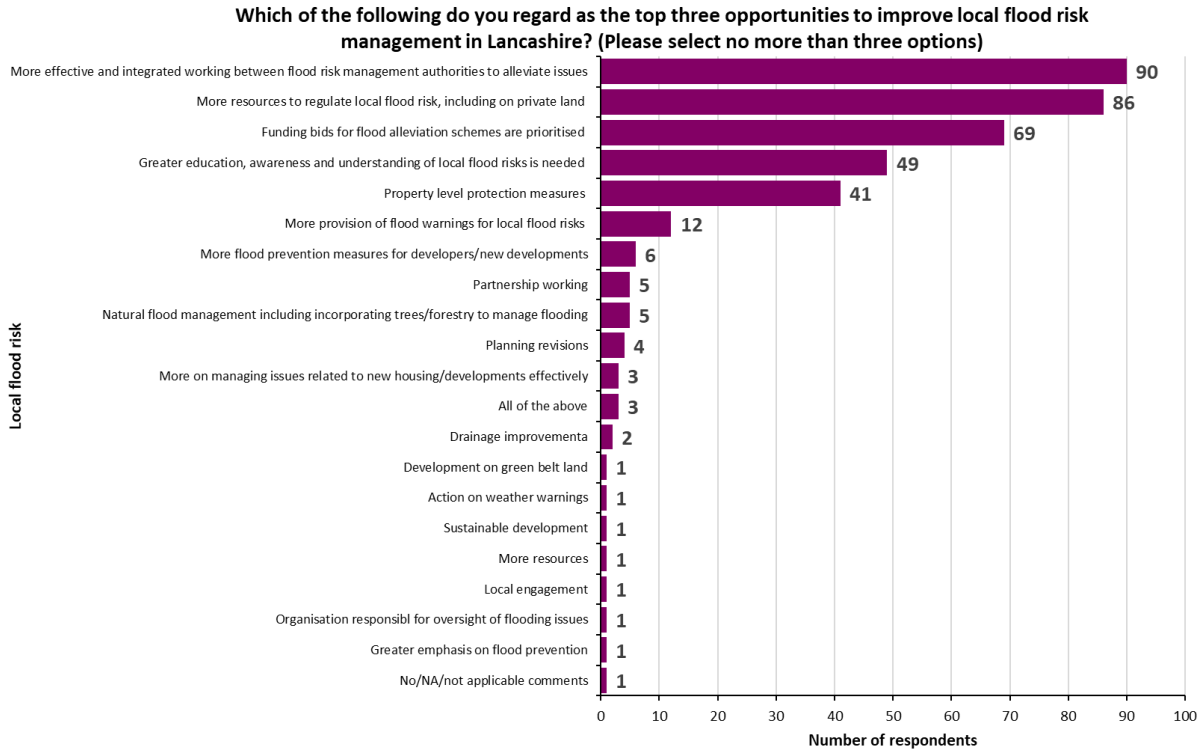


Question 9a asked respondents to reflect on whether the previous questions reflected the local risks and challenges across Lancashire. 44% said yes, with a further 31% saying that they did "somewhat", whilst 13% said "no". This question attracted a large number of comments and suggestions of "other" risks, with a significant proportion of these reflecting some of the comments in the previous two questions:

- 16 talked about managing issue related to new housing and developments effectively;
- 8 wanted a greater focus on drainage issues;
- 6 talked about effective management and/or maintenance, including upland and sand management;
- 4 sought action on flooding issues;
- Other responses tended to be in their own category or together with only one other response, or to not be relevant to the topic.

Opportunities

This section sought to provide balance with the previous focus on risks, asking about the biggest three opportunities to improve local flood risk management. The distinction between respondents' chosen options was less clear than on the previous questions, with five options attracting a large majority of responses:



33 comments were received suggesting "other" opportunities:

- 6 suggested there needed to be more flood prevention measures for developers and new developments;
- 5 wanted to see more partnership working;
- 5 wanted to see greater use of natural flood management;
- 4 would seek planning revisions;
- 3 wanted to see more effective management of new housing/developments;
- Other comments were in categories of their own, or with one other response.

Vision and Aims

These sections asked about the fundamental purpose of the strategy – i.e. to set out the direction of work in this area in the future.

Question 10 set out the national vision and the proposed local vision, and asked whether respondents felt that the local vision fitted with that of the national strategy. 48% felt it did, with a further 24% saying it "somewhat" did, and 20% saying they didn't know or were unsure. 8% (12 respondents) said that it did not.

Of those answering "no" or "somewhat", 44 offered detailed comments:

- 7 of these were not directly or indirectly applicable to the question;
- 5 considered the timeframe unrealistic;
- 5 emphasised the need for action on flooding;
- 4 suggested looking at the development and planning process;
- 4 suggested the language should be simplified;
- Other comments made by one or two respondents covered a wide range of issues, particularly around the emphasis of the vision.

Question 11 set out the ambitions of the national strategy, and the themes of the local strategy. Positively, 60% of respondents felt there was a fit between the two, 19% said they "somewhat" fit, and 6% saying they did not fit, with 15% saying they didn't know or weren't sure, making this one of the better understood and agreed elements of the strategy. 27 further comments were received, of which 4 were irrelevant to the question, and 3 called for developer accountability. Other responses were only made by one or two respondents, covering a total of 18 other topics.

Question 12 asked to what extent respondents agreed or disagreed with the vision and themes of the strategy. 73% either "strongly agreed" or "agreed", with 6% "disagreeing" or "strongly disagreeing". As with the previous question, there was little consistency with suggestions on how the vision or themes should change, with 21 relevant comments covering 19 different topic areas and only "accountability for developers" recurring more than twice. 4 further comments were not applicable.

Actions

Recognising that strategic action plans tend to evolve and adapt over time, this section included details of the proposed actions and sought open-ended comments on them. The diversity of comments received reflect the complexity of the issue, and should be treated as a valuable source of ideas.

Theme 1: Delivering effective flood risk management locally received 58 comments, of which 7 were in agreement with the theme or specific actions identified, with 1 suggesting it didn't address the issues. 19 broad areas were suggested, with the most frequently occurring being comments that focussed on specific actions (8), suggestions of specific policies or information to be included (6), reviewing house building and developments (6) and observations on partnership or collaborative working (4).

Theme 2: Understanding our local risks and challenges attracted 49 comments, of which 4 were in general agreement or specific items, and 2 which disagreed. Mapping was most commonly cited (10 respondents), with a further 4 comments calling for the inclusion of specific policies or information. A further 14 relevant categories of comment were recorded.

Theme 3: Supporting sustainable flood-resilient development attracted 54 comments, with 4 in agreement and 1 sceptical about the theme. Responses tended to group together more than across other themes, with 10 commenting about the need to review housebuilding and developments, 10 focusing on sustainable drainage, and 6 on partnership working. A further 11 relevant types of comment were recorded, some of which linked closely to aspects of the development process.

Theme 4: Improving engagement with our flood family attracted 37 comments. 4 agreed, with 1 disagreeing and a further respondent expressing scepticism. 6 noted that communication was not clear, with a further 14 comments being recorded.

Theme 5: Maximising investment opportunities to better protect our businesses and customers saw comments from 34 respondents. 4 agreed, with one being sceptical. Suggestions around lobbying and funding attracted 5 respondents, with the other categories being more disparate.

Theme 6: Contributing towards a sustainable, climate-resilient Lancashire gained 38 comments, with 4 in agreement and none expressing scepticism or disagreement. 3 suggested the inclusion of specific policies or information, but no other categories attracted significant numbers of comments.

Updating the strategy

The final section asked about the process for reporting on and reviewing the strategy. 26% sought quarterly monitoring via partnership governance, 14% wanted an annual progress report, and 49% wanted both. 22 comments were received, most of which amplified the option respondents selected.

This section also asked about the review period, with a suggestion that it was reviewed mid-term to ensure it remains up-to-date. This was supported by 85% of respondents, with three calling for an earlier review, two suggesting it needed ongoing review, and one calling for an annual review. In practice, the distinctions between these are likely to be around definitions, as the governance process would suggest that tracking the progress of actions would take place relatively frequently, with the formal review process being a more intensive exercise which would not be needed as often.