



# Flood Investigation

Consultation Report



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## 1. Introduction

The draft Flood Investigation document, hereinafter referred to as "the document", contains policies which set out the approach and extent to which Lancashire County Council (LCC), as a Lead Local Flood Authority (LLFA), will investigate a flood incident and publish its results in accordance with its duty.

This report analyses consultation responses received during a public consultation of the document between 3 July 2023 and 27 August 2023.

## 2. Background

It is intended for the document to supersede Lancashire County Council's current Flood Investigation Policy, produced in 2014, taking account of lessons learnt as we have applied this policy and undertaken our duties in response to a wide range of flooding events.

This fulfils objective 1.2 of the Lancashire Local Flood Risk Management Strategy 2021 – 2027, adopted in November 2021, which commits the Lead Local Flood Authority to reviewing and revising its current Flood Investigation Policy by March 2024.

## 3. Public Consultation

A public consultation of the document was undertaken between Monday 3rd July 2023 and Sunday 27th August 2023. The purpose of this consultation was to gather views from a wide range of stakeholder groups and the public about the content of the document and the policies within.

### 3.1. The Survey

The consultation was conducted via an online snap survey hosted on the county council's 'have your say' consultation webpage. A full list of consultation questions can be found in Appendix A of this report. Consultation materials included:

- a copy of the document,
- a link to the county council's current Flood Investigation Policy,
- a link to the Flood and Water Management Act, 2010, and
- a link to the Lancashire Local Flood Risk Management Strategy 2021 – 2027.

Hard copies of the survey and consultation materials were made available on request via email and from county council owned libraries across Lancashire. Accessible versions were also made available on request.

### 3.2. The Consultees

Stakeholder groups and the public were notified of and invited to contribute to the public consultation via the following means:



- Weekly social media posts across the county council's platforms, including Facebook and X (formerly known as Twitter).
- Emails to identified stakeholder groups as shown in table 1 below.
- Posters that were placed in all county council owned libraries to promote the consultation throughout the 8-week consultation period.
- A consultation announcement and reminders that were uploaded onto the county council's intranet and C-First for County Councillors.

**Table 1:** Stakeholder Groups invited to comment on the consultation via email.

<b>Lancashire County Council</b>	Lead Local Flood Authority, Highway Authority, Design and Construction, Asset Management, Estates and Schools, Planning, Climate Change and Environment, Sensory Impairment Team.
<b>District Councils</b>	Local Planning Authority and Drainage Officers.
<b>Environment Agency</b>	Partnership and Strategic Overview Teams, Spatial Planning and Asset Management teams for the Cumbria and Lancashire and for the Greater Manchester, Merseyside and Cheshire areas.
<b>Water and Sewerage Companies</b>	United Utilities, Yorkshire Water
<b>Internal Drainage Board</b>	Earby and Salterforth Internal Drainage Board
<b>Other organisations</b>	Association of Drainage Authorities, Association of SuDS Authorities, Blackpool Council, Blackburn with Darwen Council, Canal and Rivers Trust, Electricity North West, Rivers Trusts (Irwell, Ribble, Douglas, Alt Crossens, Lune, Wyre), Lancashire Flood and Coastal Erosion Risk Management Partnership, Lancashire Wildlife Trust, National Highways, National Trust, Natural England, Network Rail, National Farmers Union, North West North Wales Coastal Group, RSPB.
<b>Councillors and Committees</b>	All County Councillors, Lancashire Association of Local Councils, North West Regional Flood and Coastal Committee.
<b>Equality Groups</b>	Disability First, Disability Equality North West, N Vision North West, Carers Trust Fylde Coast, Empowerment Charity, Age UK, Alzheimers, Accrington & District Blind Society, Deafway, Preston and Western Lancashire Race Equality Council.

## 4. Consultation Results

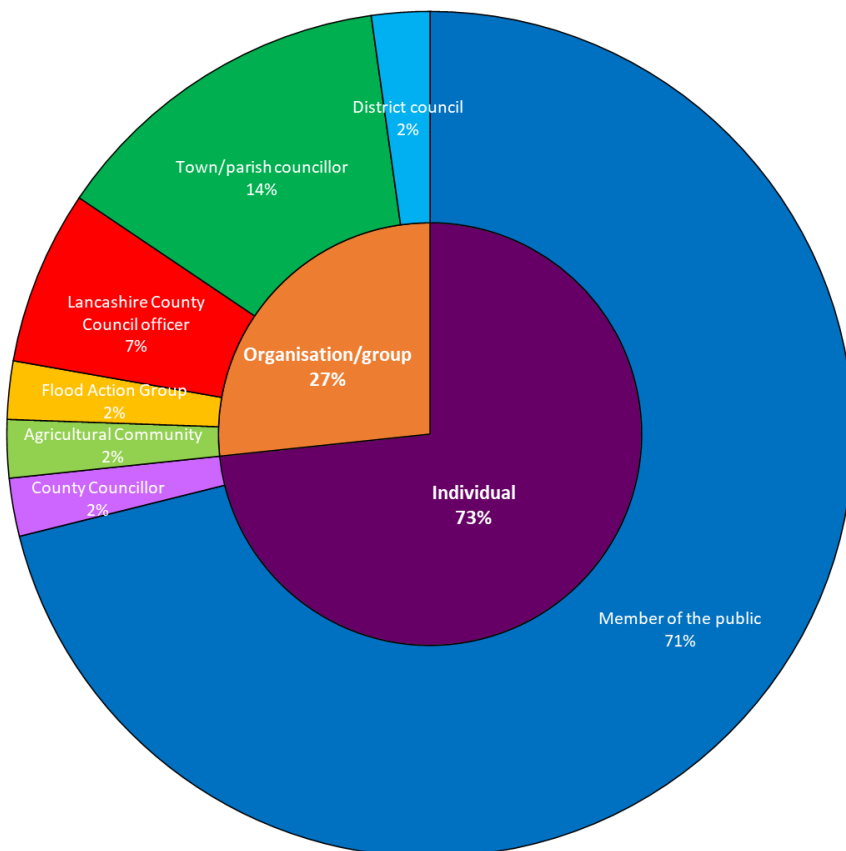
A total of 43 online snap survey responses and 2 paper survey responses were received giving a combined total of 45 survey responses to the public consultation. We also received one additional email of support for the document, however this response has been omitted from the data analysis and is not included in the survey response total.

All consultation responses have been given equal weighting for the purpose of the data analysis, and all responses will be used to inform post-consultation changes to the final Flood Investigation document and policies within, where this is considered to be appropriate. Consultation responses will also be used to inform the writing of the guidance document which will accompany the final version of the document.

### 4.1. The Respondents

The first section of the consultation survey, Questions 1 to 7, asked respondents if they were responding to the survey as an individual or as part of an organisation / group, and if an organisation / group, then which one. The results to Questions 1 to 7 are shown in Figure 1 below:

**Questions 1 to 7: Who are you and where are you responding from?**



**Figure 1: Respondents by group**

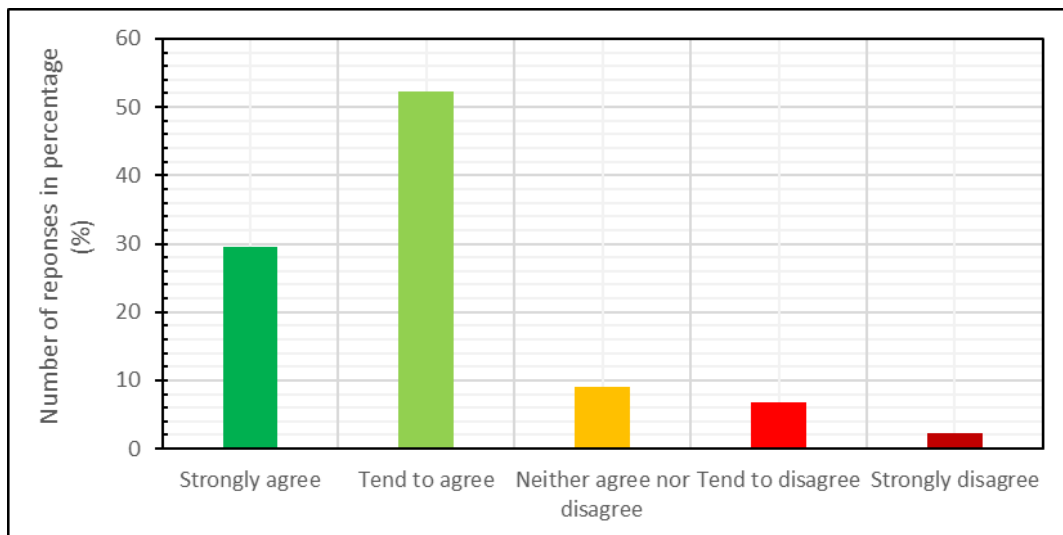


Figure 1 shows into which groups the 45 consultation respondents fit. The inner section shows that 73% of respondents were individuals and 27% belong to organisation/groups. The outer circle breaks these categories down further into specific groups and communities, for example almost all the individuals who responded to the consultation were members of the public, apart from 1 person (2%) who was a County Councillor. There were 5 organisations / groups that also responded to the consultation, including the agricultural community, Flood Action Groups and District Councils. Within the county council, consultation responses came from officers within the Ecology, Design and Construction and Flood Risk Management teams.

## 4.2. Survey Responses

The next section of the consultation survey, Questions 8 to 32, asked respondents for their views on the content of the document and the policies within. The results to multiple choice Questions 8, 10, 12, 14, 16, 18, 20, 22, 24, 26, 28 and 30 are shown in Figures 2 to 13 below:

### Question 8: Do you agree or disagree that in the introduction is clear?

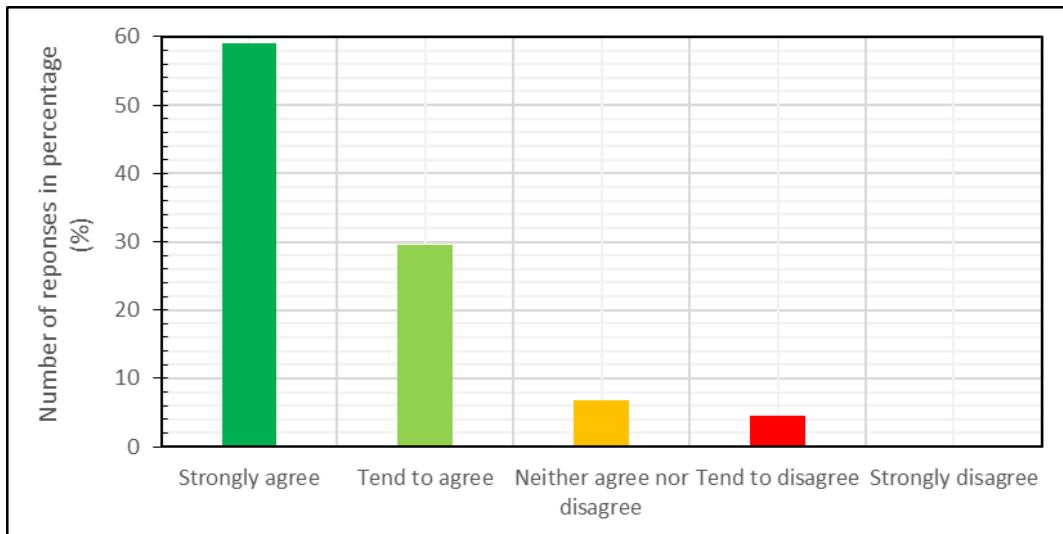


**Figure 2: Clarity of the introduction.**

Figure 2 shows that in response to Question 8, over 80% of those filling in the questionnaire agree the introduction is clear in explaining what the document contains. 9% disagree that it is clear and 9% neither agree nor disagree.



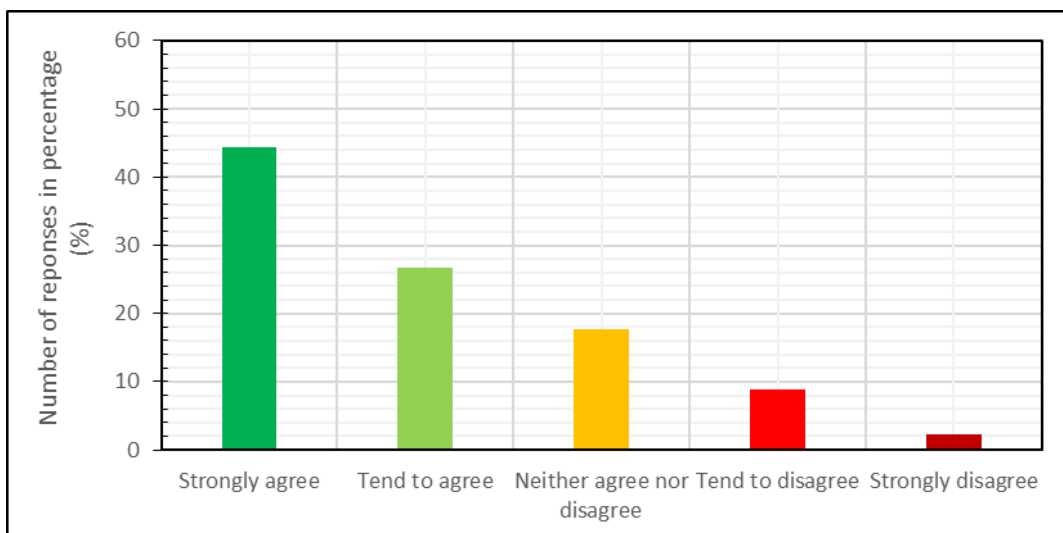
**Question 10: Is the document clear in why flood incidents are important to report?**



**Figure 3: Flood incidents are important to report.**

Figure 3 shows the response to Question 10. The most popular response is strongly agree with 59% of responses, followed by the agree with 29% of responses, showing that 89% of people think it is clear why flood risk incidents should be reported. No respondents selected strongly disagree and with 5% of respondents tending to disagree that the document is clear why flood incidents should be reported.

**Question 12: Do you agree or disagree with the level of information needed when reporting a flood?**

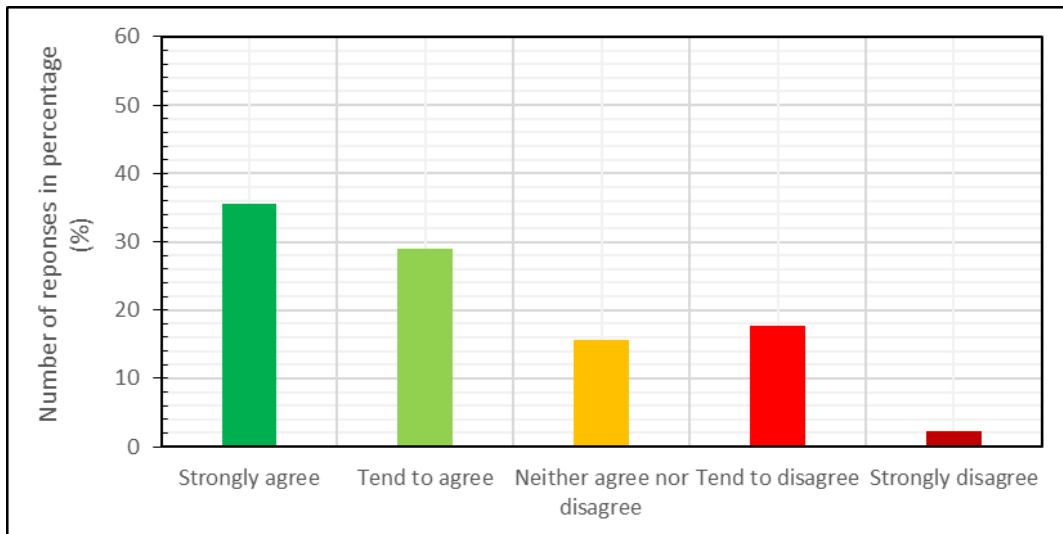


**Figure 4: The minimum level of information for flood reporting.**

Figure 4 shows that over 70% of those who responded either strongly or tend to agree with the minimum level of valid information. Only 1 respondent (2%) strongly disagrees.



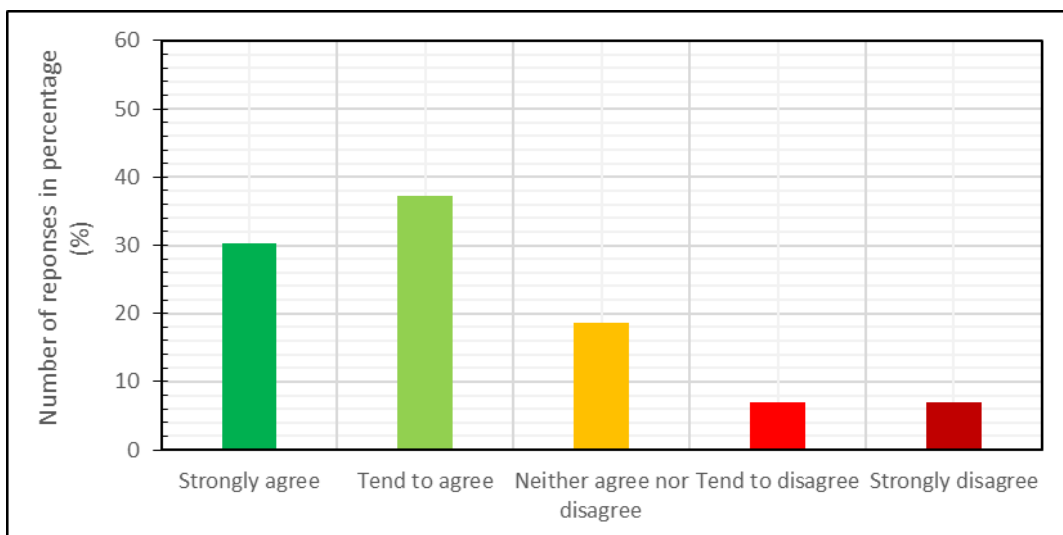
**Question 14: Do you agree or disagree it is clear when an investigation tier is triggered and what points need satisfying.**



**Figure 5: When investigation tiers are triggered.**

In figure 5 the responses are more evenly distributed. 65% of respondents either strongly or tend to agree and 35% of respondents either disagree or neither agree or disagree that it is clear than an investigation tier will be triggered if points a, b, c, and d have been satisfied.

**Question 16: How strongly do you agree or disagree with Tier 1?**



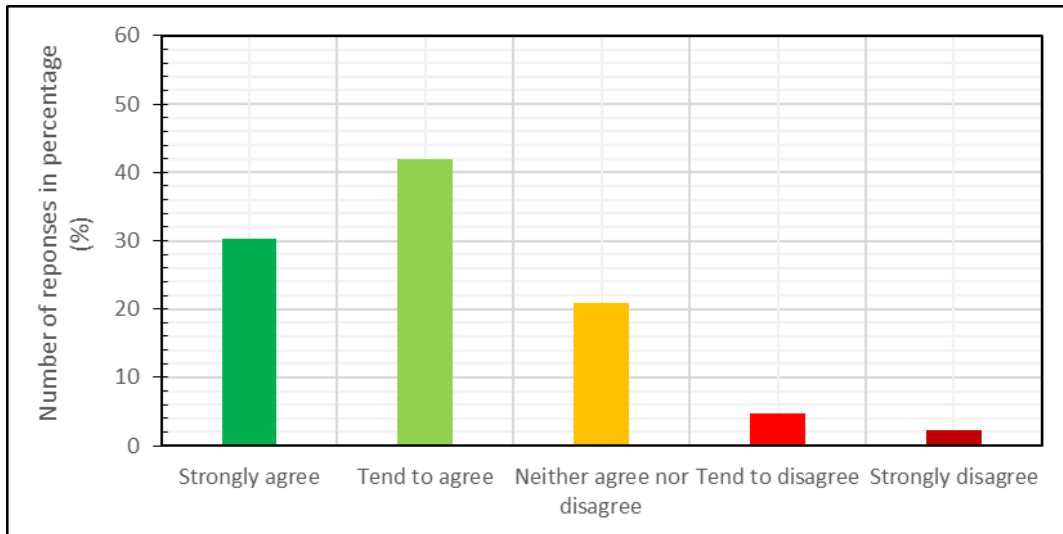
**Figure 6: Response to Tier 1**

Figure 6 shows most respondents, 37%, tend to agree with tier 1 in the document. 30% of respondents answered strongly agree and 14% of respondents' answers were in the tend to disagree or strongly disagree category.





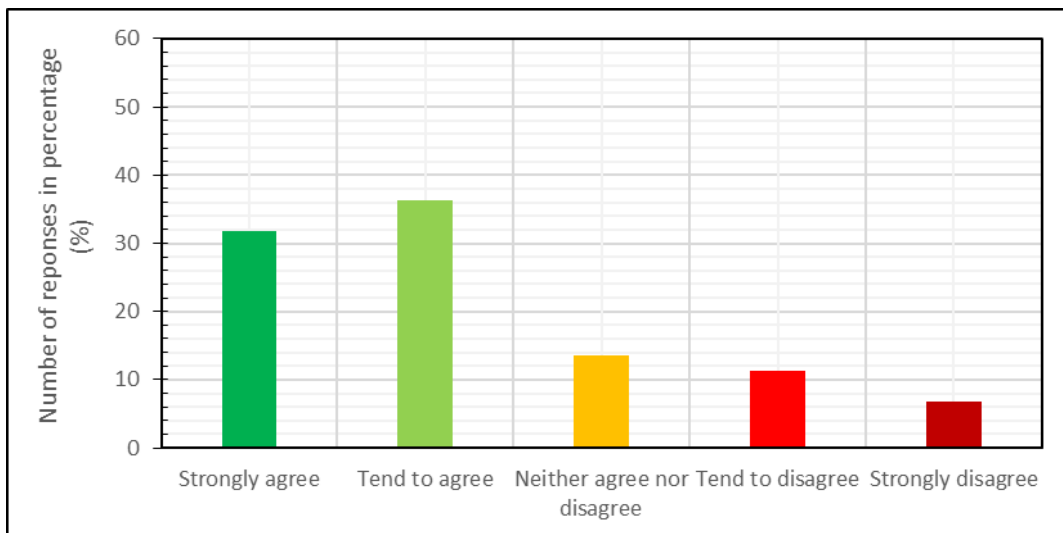
**Question 18: How strongly do you agree or disagree with Tier 2?**



**Figure 7: Response to Tier 2**

Figure 7 shows that 72% of responses either strongly agree or tend to agree with tier 2. The tend to agree option received 42% of responses. The disagree categories received 6.5% of responses. 21% of respondents answered in the neither agree nor disagree category.

**Question 20: How strongly do you agree or disagree with Tier 3a?**

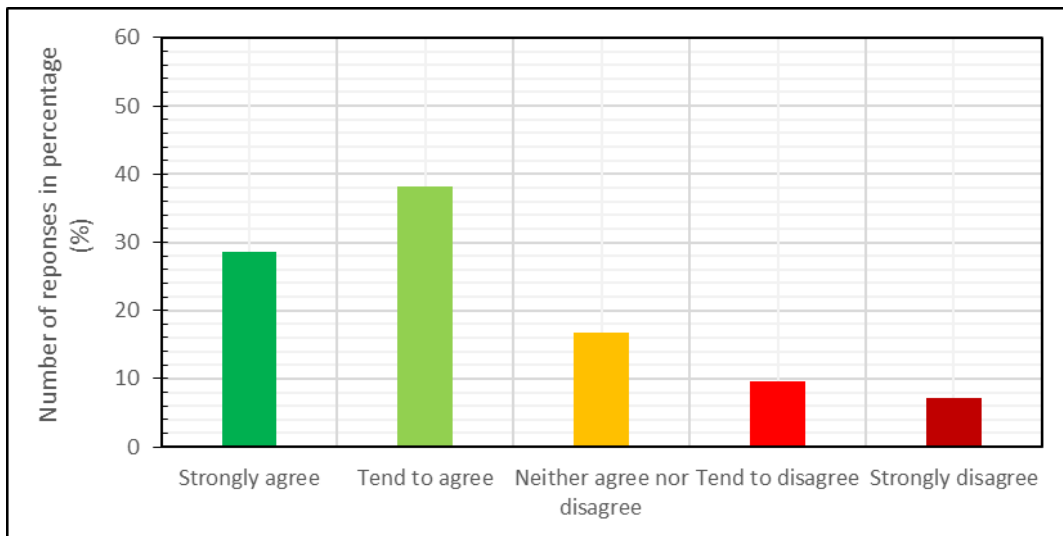


**Figure 8: Response to Tier 3a.**

Figure 8 refers to the response for Question 20. The category that received the highest responses was tend to agree with 36%, followed closely with strongly agree at 32% making the combined total for agree with tier 3a, 68%. Tend to disagree received 11% of the responses and strongly disagree, 7%.



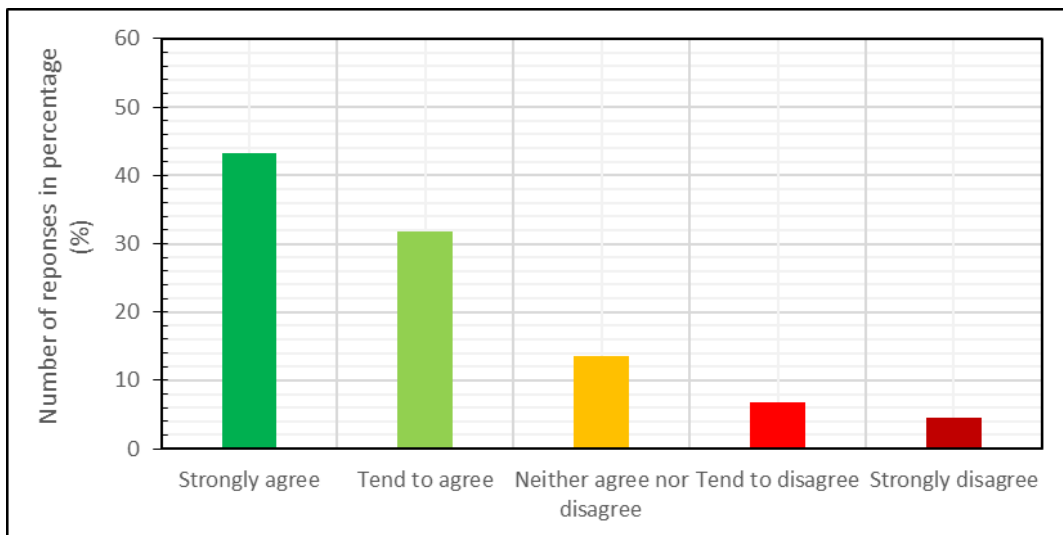
**Question 22: How strongly do you agree or disagree with Tier 3b?**



**Figure 9: Response to Tier 3b**

Figure 9 shows the responses for Question 22 which received the lowest number of responses with 42 out of the 45 respondents answering. The tend to agree option received the highest number of responses at 38%, followed by strongly agree which got 28%. The disagree options got a combined total of 17% of the responses.

**Question 24: How strongly do you agree or disagree with Tier 4?**

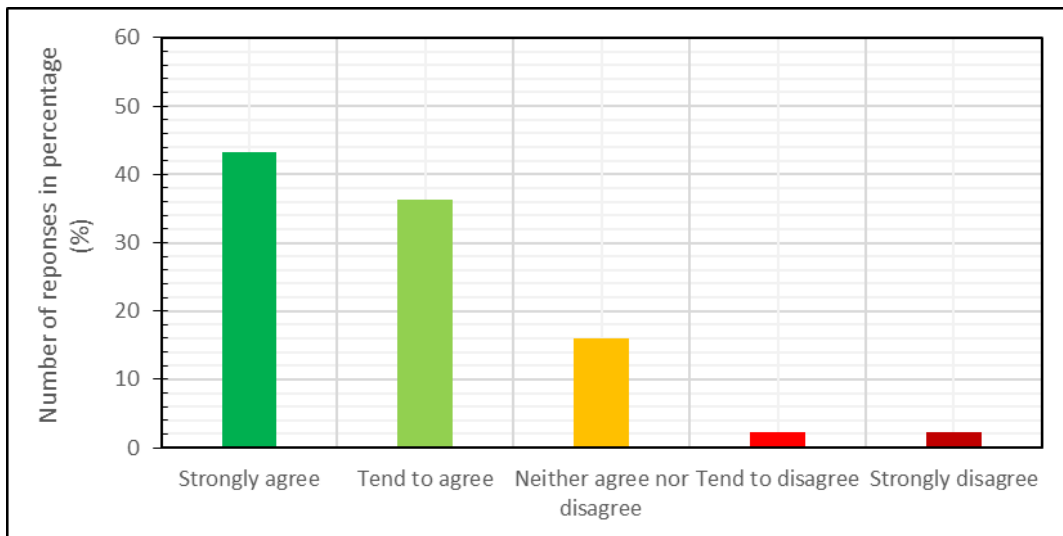


**Figure 10: Response to Tier 4**

Figure 10 shows the responses to Question 24. The category with the highest responses is strongly agree, with 43% of the respondents selecting this answer. 7% of respondents selected tend to disagree and 5% selected strongly disagree.



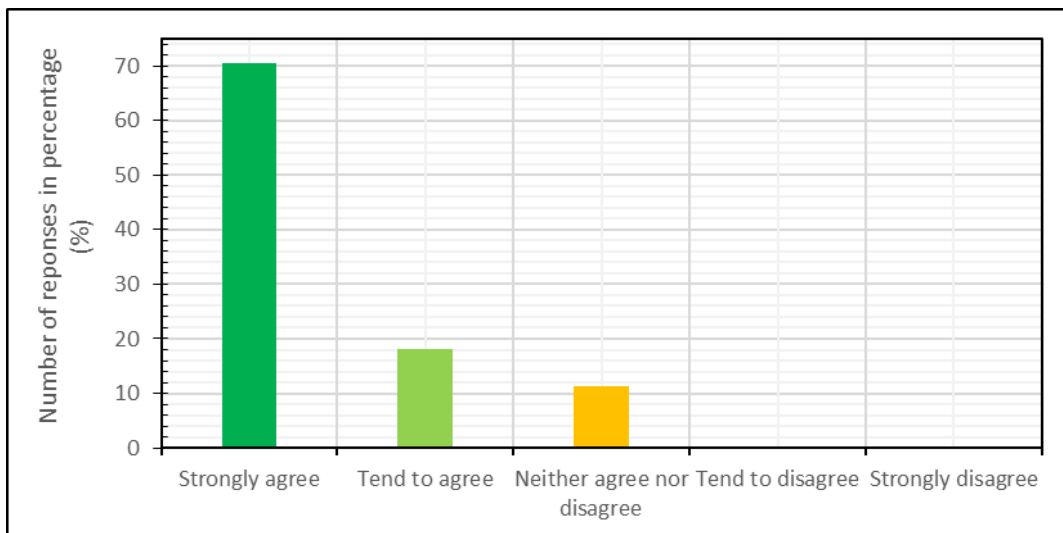
**Question 26: How strongly do you agree or disagree with Tier 5?**



**Figure 11: Response to Tier 5**

Figure 11 shows the highest response to Question 26 is strongly agree with 43% of responses. The second highest answer tend to agree at 36%, making the combined agree percentage 80%. Both disagree responses got one response each.

**Question 28: Should the LLFA publish a register of flood incidents over the outlined threshold?**

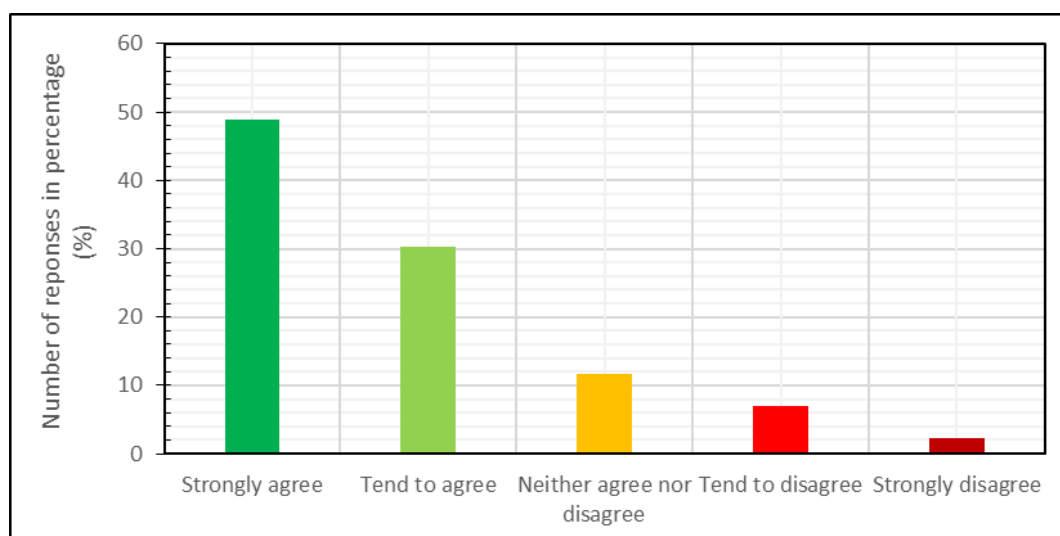


**Figure 12: Publishing a register of flood incidents.**

Figure 12 shows the response to the Question 28. For this question no respondents disagreed that the LLFA should publish a register for flood incidents that meet the thresholds set out in Policy INV2. 89% of respondents either strongly agreeing or tending to agree. 11% opted for neither agree nor disagree.



**Question 30: How strongly do you agree or disagree with the information in the flood incident register?**



**Figure 13:** Information in the flood incident register.

**Figure 13** shows that 49% of respondents selected that they strongly agree with the information that will be contained in the flood incident register. 30% selected the tend to agree making up a combined total of 80% of the responses. The disagree category received a combined percentage of 9%.

The consultation survey also invited additional comments and suggestions in Questions 9, 11, 13, 15, 19, 21, 23, 25, 27, 29, 31 and 32. A total of 125 comments across all consultation questions were received. Each of these comments have been reviewed and are categorised as follows:

- No comment, no action
- Comment noted, no action required
- Comment noted, action within policy document
- Comment noted, action within guidance document

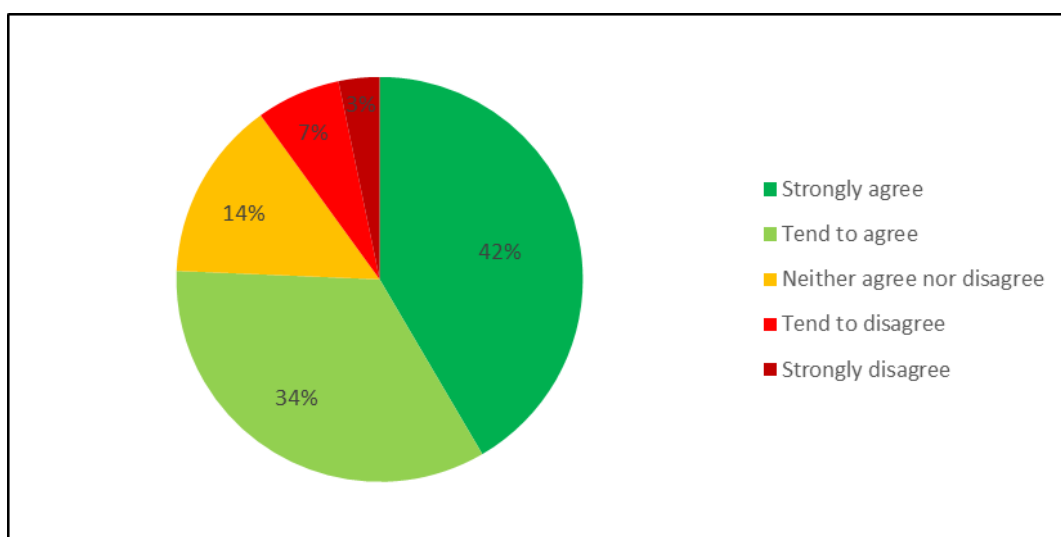
Where action is required, the feedback provided will be taken into account when shaping the final version of the relevant document(s).

## 5. Consultation Analysis and Interpretation

Overall, the results suggest that respondents agree to the consultation questions more than they disagree. Some parts of the document are supported more than others, showing there are areas where the document could be improved.

Figures 14 and 15 below combine responses from multiple questions to promote further comparison and to help form the conclusions drawn.

**Summary of all multiple-choice questions**



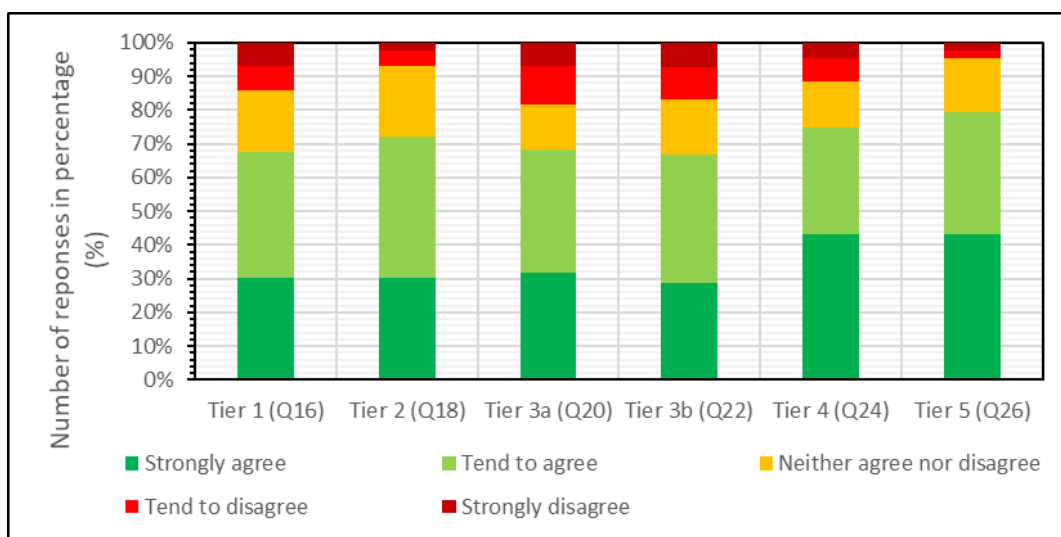
**Figure 14:** Overall percentage agreement to consultation questions.

Figure 14 combines all responses to Questions 8, 10, 12, 14, 16, 18, 20, 22, 24, 26, 28 and 30, totalling 552 responses.

Looking further at Figure 14, the largest section is 'strongly agree' with respondents selecting this answer 42% of the time. A total 76% of responses are in the 'agree' category, demonstrating that the document is well supported overall.

Only 10% of responses are in the 'disagree' categories, with 'strongly disagree' being selected in just 3% of responses. Reasons for this are explored further in Section 5.1 below.

### Summary of questions regarding tiers



**Figure 15:** Responses to consultation questions regarding tiers.

Table 1 of the document explains what outputs will be published depending on the severity of each flooding event, as categorised by tiers. The public consultation contained 6 questions which all referred to this table and the results have been compared in Figure 15 above.

The response to Questions 16 to 26 all follow a similar trend, with either 'strongly agree' or 'tend to agree' being selected most frequently.

Both 'published investigation outputs' set out in Policy INV2 of the document are supported. The output for tiers 4 and 5 is the creation of a 'Flood Investigation Report' which is supported more than the output for tiers 1, 2, 3a and 3b which involves placing them on a 'Flood Incident Register'.

This observation should not detract from the 'Flood Incident Register', as Figure 12 shows the Flood Incident Register is strongly supported, with no respondents disagreeing with its creation. However, Question 30 regarding the contents of the register, as shown in Figure 13, did receive a small number of 'disagree' or 'strongly disagree' responses. Further clarity could be provided to the contents of the Flood Incident Register and how it would work in practice.

### 5.1. Data Anomalies

Looking at the raw data alongside Figure 14 allows comparison of individual responses and whether they are reflective of the data set. One respondent strongly disagreed with 9 out of the 12 questions analysed, meaning they make up 53% of the strongly disagree section in Figure 14. Another respondent answered with neither agree nor disagree for 11 out of the 12 multiple choice questions. Every response must be treated equally but both these responses do not reflect the general trends of the overall data set.



## 5.2. Individual questions to further review

All questions follow a similar trend but to differing degrees of support. There are some questions to examine further.

For example, Figure 2 shows that 18% of respondents disagreed with Question 8, suggesting the introduction was not clear. It is important those reading the document understand what the document contains, therefore the data suggests there is a need for further clarity in the introduction.

Similarly, 36% of respondents disagreed with Question 14, as shown in Figure 5. This question asked 'how clear is it that an investigation tier will be triggered if points a, b, c and d have been satisfied?'. The data suggests this section of the document needs further clarification on when an investigation would be triggered.

## 6. Summary and Recommendations

Overall analysis of the data and comments suggests the reception to the consultation document was positive and generally the content of the document and the policies within are supported. Some areas where clarification and refinement are recommended have been identified, including:

- a) Section 1 'Introduction' requires further detail and clarity, including on how to report flooding and the process of how flooding is investigated.
- b) Section 2.2 'INV2: Flood Investigation Policy', requires further explanation as to when an investigation will be triggered.
- c) Section 2.2 'INV2: Flood Investigation Policy' should be revisited to in terms of the outputs of each tier of flood investigation. Whilst both proposed 'published investigation outputs' are supported, the output of a 'Flood Investigation Report' for tiers 4 and 5 is more supported more than a 'Flood Incident Register' output for tiers 1, 2, 3a and 3b.
- d) Section 2.2 'INV2: Flood Investigation Policy' should be reviewed to consider whether flooding to agricultural land is appropriate to be incorporated within any tier.
- e) Section 2.3: 'Flood Incident Register' is strongly supported, however further clarity is needed on the content of the register and how the register would work in practice.



## Appendix A - List of consultation questions

- Question 1:** Are you responding as an individual or on behalf of a group/organisation?
- Question 2:** If an individual, are you? (Member of the public or other)
- Question 3:** If other please provide?
- Question 4:** If organisation, what is your organisation/group? (Agricultural Community, Charitable Organisations, Community Interest Group, Consultants, County Councillor, Developers, District Councillor, Electricity North West, Environment Agency, Flood Action Group, Internal Drainage Board, Lancashire County Council, Lead Local Flood Authority (Neighbouring), Local Highway Authority, Member of Parliament, National Highways, Network Rail, RFCC Member, Town / Parish Councillor, United Utilities, Yorkshire Water and other.)
- Question 5:** If other, please provide
- Question 6:** If LCC officer, which LCC service do you work for? (Asset Management, Countryside, Design and Construction, Development Control and Spatial Planning, Ecology, Environment and Climate Change, Estates, Flood Risk Management, Highway Infrastructure, Highways Operations, Public Rights of Way, Strategic Development, Transport Planning and Transport Infrastructure and Delivery.)
- Question 7:** If other (LCC service) please provide
- Question 8:** How strongly do you agree or disagree that it is clear from the introduction what the Flood Investigation policy is about?
- Question 9:** Please can you tell us why? (if disagree)
- Question 10:** How strongly do you agree or disagree that it is clear why it is important to report flood incidents to the Lead Local Flood Authority?
- Question 11:** Please can you tell us why? (if disagree)
- Question 12:** How strongly do you agree or disagree with the minimum level of valid information, direct to Lead Local Flood Authority to made aware of a flood?
- Question 13:** Please can you tell us why? (if disagree)
- Question 14:** How strongly do you agree or disagree that it is clear that an investigation tier will be triggered if points a, b, c and d have been satisfied?
- Question 15:** Please can you tell us why? (if disagree)
- Question 16:** How strongly do you agree or disagree with Tier 1?
- Question 17:** Please can you tell us why? (if disagree)





- Question 18:** How strongly do you agree or disagree with Tier 2?
- Question 19:** Please can you tell us why? (if disagree)
- Question 20:** How strongly do you agree or disagree with Tier 3a?
- Question 21:** Please can you tell us why?(if disagree)
- Question 22:** How strongly do you agree or disagree with Tier 3b?
- Question 23:** Please can you tell us why? (if disagree)
- Question 24:** How strongly do you agree or disagree with Tier 4?
- Question 25:** Please can you tell us why? (if disagree)
- Question 26:** How strongly do you agree or disagree with Tier 5?
- Question 27:** Please can you tell us why? (if disagree)
- Question 28:** How strongly do you agree or disagree that the Lead Local Flood Authority should publish a register of flood incidents that meet the thresholds set out in Policy INV2?
- Question 29:** Please can you tell us why? (if disagree)
- Question 30:** How strongly do you agree or disagree with the information that will be contained in the register?
- Question 31:** Please can you tell us why? (if disagree)
- Question 32:** Do you have any further comments to make in regard to the Flood Investigation Policies?

