

Appendix B – Schedule of Issues

Initial Matters for consideration

General comments

While it is understood that the Flood Risk Management Plans have been developed in response to European legislation, the draft plans as they stand may not be suitable for a general public audience. These are very detailed and extensive documents, perhaps more so than need be.

In particular, the summary leaflet describes the Flood Risk Management Plan as a single point for joining up working and bringing together all flood risk management strategies and plans. In effect, it is presented as the definitive document for Flood Risk Planning in the area, but contains little reference to the statutory Local Flood Risk Management Strategies or, indeed the National Flood and Coastal Erosion Strategy, with which the Local Flood Risk Management Strategies must legally be consistent.

In Lincolnshire, the flood risk and drainage management partnership has deliberately developed the Local Flood Risk Management Strategy as a joint document, covering flood risk from all sources. This raises the question of which takes precedence, and whether there is a risk that local priorities could be driven by objectives set in the Flood Risk Management Plans, at a much broader geographical basis and on very different governance principles.

The representation of measures as a count for each catchment, and for the river basin district as a whole, is potentially highly inconsistent and misleading. This is partly because each catchment is very different in its geography, topography and levels of risk. More important, however, is the fact that the level of detail supplied by each Lead Local Flood Authority will be very different.

For example, Lincolnshire has supplied only information on the larger schemes, on the basis that the common works programme is revised every year, and because the partnership is developing a method of prioritising local schemes that is specific to Lincolnshire. It must be questioned whether schemes of this scale need to be reported in a document covering a whole river basin, how the six-year timescales for revising FRMPs would accommodate local flexibility and revision of local programmes, and whether setting objectives and measures at river basin level could override more local prioritisation.

In effect, the pie-chart form of enumerating schemes does not, at present compare like with like, and risks giving an unrealistic impression of the levels of activity across the river basin area. It is a concern that little reference is made to local strategies as a means of determining local objectives and priorities. It could be suggested that the maps and charts bring little real value to the document, and the key source of referencing for any schemes other than Environment Agency programmes sanctioned by the RFCC should be Local Flood Risk Management Strategies – the more so where it has been agreed that the Local Flood Risk Management Strategy already encompasses a joint approach.

Catchment summaries

The role of Lincolnshire County Council (as LLFA) along with the Flood Risk Management Partnership and the implementation of the Joint Lincolnshire Flood Risk and Drainage Management Strategy in 2012 is well covered in the introduction section of the Witham catchment. The sections on the Nene and Welland catchment, however, make no reference to this, in fact under the Welland catchment Lincolnshire only gets a mention as having minor contributions (compared to Northants, Leics and Peterborough CC) when in fact half of the catchment falls within the Lincolnshire county boundary.

Within summary introductions of each catchment area there is reference to 'other sources of flooding' which includes reference to surface water. In some cases this is identified as a significant issue. Yet there is no reference to the way in which surface water issues are being investigated or dealt with (for example through the Lead Local Flood Authority responsibility), or of scheme identification and implementation via local strategies.

The tables detailing actions in each catchment are very repetitive, with most sections beginning "To minimise the risk of flooding etc etc" These form a sizeable portion of the document and if these could be slimmed down by referencing key documents such as local Flood Risk Management Strategies, Shoreline Management Plans etc, then this would surely make the whole document more digestible. In the current form they seem to offer little of particular substance.

Other comments

The above comments are offered as initial thoughts to assist debate on these very large documents. Members of the Scrutiny Committee are invited to consider them in this light, but there may be other issues that Members may wish to bring to the attention of the Committee.

Further discussion is expected within the Lincolnshire Flood Risk and Drainage Management Partnership, with Members' views informing the final version of the formal response submitted to the consultation.