

Black Country LFRMS Consultation Responses

Private Individual/ organisation	Comment Reference	Comment	Response	Action Taken
Alan Boyd Walsall & Sandwell Councils	Sandwell 1	<i>Do you agree with the approach taken by the Councils to the management of flood risk including: Developing a risk based approach on establishing a local significance consequence</i> A pragmatic approach	Comment noted	No change
Kim Kang		<i>What information do you think should be made publicly available?</i> Where hot spots are more likely and what action would be taken.	Comment noted, the Black Country Authorities will publish as much information as possible, while ensuring that personal information and commercially sensitive information is redacted where appropriate.	No change
Alan Boyd Walsall & Sandwell Councils	Sandwell 2	<i>What information do you think should be made publicly available?</i> As much information as is reasonable	Comment noted, the Black Country Authorities will publish as much information as possible, while ensuring that personal information and commercially sensitive information is redacted where appropriate.	No change
Robert Sunley Sandwell MBC	Sandwell 3	<i>What information do you think should be made publicly available?</i> Flood prevention/mitigation methods in new planning schemes	Comment noted, the flood mitigation measures that form part of any new development are available on the planning portals of the individual local authorities as part of the associated documents that accompany a planning application. Therefore this information is already publicly available.	No change

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Severn Trent Water	ST Q1	<p>We agree with the approach taken and can understand the advantages of doing a joint LFRMS for the Black Country. We recommend that the strategy could be enhanced further by the additional of more LLFA specific content in the strategy.</p> <p>We also recommend that the strategy includes more references the links to other RMA plans and strategies. For instance, you may wish to consider cross referencing our AMP 6 plans, especially those aspects that are helping to reduce flood risk from sewers throughout the black country. More specifically, our target is to reduce incidents of internal sewer flooding by 13% and external sewer flooding by 6%. We will do this by adopting a more risk based outcomes approach in line with EA / OFWAT Drainage Strategy Framework (http://www.ofwat.gov.uk/wp-content/uploads/2015/12/rpt_com201305drainagestrategy1.pdf) and the Sewerage Risk Management 5 (SRM5) methodology. We will be focussing on managing low severity sewer flooding through property level protection, whilst also increasing our investment in schemes to increase the capacity of our network. We will continue to invest in repairing, replacing and rehabilitating the sewerage network, as well as undertaking proactive and reactive maintenance of the network. We will have an increased emphasis on changing customer behaviours to reduce sewer blockages which can lead to flooding. We will deliver more sustainable solutions to flooding and work in partnership with other RMAs to deliver integrated flood risk management schemes. Finally, we will be significantly increasing the amount of real time monitoring and telemetry we have on the network to better understand and manage flood risk.</p>	<p>Comment noted and accept that additional information regarding the AMP6 plans would be beneficial context to add to the LFRMS.</p>	<p>Additional text added to the section regarding the role and responsibilities of Severn Trent Water.</p>
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Severn Trent Water	ST Q2	<p>Yes, in our view the strategy mostly does explain roles and responsibilities, but we recommend making the following clearer / addressing these points:-</p> <ul style="list-style-type: none"> - Definitions and responsibilities associated with surface water flooding - The glossary refers to surface water flooding as “In this context, surface water flooding describes flooding from sewers, drains and runoff from land, small water courses and ditches that occurs as a result of heavy rainfall” and distinguishes this from ‘pluvial flooding’. This definition of surface water flooding (we presume taken from the SWMP guidance) suggests surface water flooding is the responsibility of multiple organisations including us as STW as it includes sewer flooding. However, the main body of the report clearly states that ‘surface water flooding’ is the responsibility of the LLFA, and that sewer flooding is STW’s remit. Whilst we appreciate the complexities and subtleties of urban flooding, including responsibilities, we do recommend that there is more consistency in the documents when referring to ‘surface water flooding’, ‘surface runoff flooding’, ‘pluvial flooding’ especially in relation to roles 	<p>Comment noted, we agree that the definition of surface water flooding could be improved to avoid confusion. We recommend that for the purpose of the LFRMS that surface water flooding is defined as that which results from intense rainfall leading to overland flow and ponding only.</p>	<p>Terminology table amended to revise definition of surface water flooding and to add in sewer flooding.</p>
Severn Trent Water	ST Q2	<p>- We recommend that some of the references to water companies and water company activities are more consistent and updated. For instance:-</p> <ol style="list-style-type: none"> 1. DG5 register – Water companies no longer hold a formal DG5 register. For us at STW, we still have a register but this is now a risk register, referred to as a ‘Flood risk register’ 2. There is a mixture of references to water companies and water authorities. 3. 4.3.9 – Given the definition of a flood in the Flood and Water Management Act 2010, we would recommend removing the reference to ‘water supply’ 4. 4.3.10 – We would recommend removing the references to land owners. It is much more likely that we work with local authorities rather 	<p>Comments noted, points one to three are accepted. However it is appropriate to reference landowners in section 4.3.10 as in reducing runoff to sewers they are a key party in that process. Accept that local authorities also play a key role and therefore it is appropriate to highlight that here.</p>	<p>Text changed; DG5 references replaced with ‘flood risk register’, consistent reference to water companies, reference to water supply removed.</p> <p>Reference to local authorities added to Section 4.3.10.</p>

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Severn Trent Water	ST Q3	<p>Yes we agree with the proposed approach to manage flood risk. We recommend that the following points be considered and are noted: -</p> <ul style="list-style-type: none"> - Vision, Aims, Objectives – We support the vision to ‘reduce risk to all’. We would recommend making it clearer what ‘risk to all’ means, especially when the approach appears to be focussing on areas of greatest risk. We also support that the vision will be ‘undertaken following a clear and transparent approach’ but again would recommend more clearly setting out this approach in the strategy, including how the aims and objectives relate to each, and whether this reduction in risk can be quantified. For instance, we would recommend explicitly stating and summarising what this approach is e.g. “the approach to managing flood risk is...” - Managing exceedance flows - We recommend more consideration is given to how exceedance flows can be managed and how the problem of drainage systems have different return periods can be managed. For instance, there is an increasing amount of guidance that could be used to inform such a strategy e.g. “C738 –Managing urban flooding from heavy rainfall – encouraging the uptake of designing for exceedance”. On page 7 of the document, there is reference to “inadequate drainage infrastructure”. We would recommend distinguishing between drainage infrastructure capacity being exceeded and drainage infrastructure being ‘inadequate’ and explaining what is meant by adequate. 	<p>Comment noted, the vision is appropriate to state that the LFRMS will reduce risk to all as it encompasses a range of actions to manage flood risk across the Black Country including control of new development as well as new flood risk management schemes.</p> <p>Management of exceedance flows in new major developments is a requirement of the SuDS Standards. This will be reinforced by the actions under Measure 4A, particularly to develop Black Country guidance on the use of SuDS and drainage of new developments. If exceedance flows are currently leading to surface water flood risk these will be investigated and if necessary schemes developed to deal with these issues.</p> <p>Accepted that use of 'inadequate drainage infrastructure' is in appropriate, and it is correct to refer to its capacity being exceeded.</p>	<p>Text on page 7 amended to refer to 'exceedance of drainage infrastructure capacity' rather than 'inadequate drainage infrastructure'.</p>
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Severn Trent Water	ST Q3	<p>- Partnership Approach – We are supportive of this approach and we look forward to working with you. It would be good to discuss what working in partnership to address flooding means for you.</p> <p>- Urban creep – We fully support the reference to the issue of urban creep and the proposed action in the Action Plan. We would welcome further insight into how urban creep could be reduced.</p> <p>- We are supportive of the principle of making information freely available. We also support the LFRMS distinction between information shared between RMAs and information that is publically available. However, please bear in mind that some of our information may be sensitive and may have commercial value and therefore may not be appropriate to share or share free of charge</p>	Comments noted.	No change
Severn Trent Water	ST Q4	<p>- We were not clear what the 'Human Health' consequence category meant in Appendix D "Flooding of 15 people, but no less than 5 properties". We would recommend further clarity.</p> <p>- We would also recommend that there is a degree of flexibility built into this approach since some surface water flooding events can only affect a small number of properties.</p> <p>- Please be aware that we investigate (to varying levels) all reported incidents of sewer flooding.</p> <p>- We would also recommend that further details are included as to what an 'investigation' may consist of.</p>	Comment noted, these are the agreed thresholds for prioritisation of flood investigations. However there will be flexibility in application of the thresholds and the Black Country Authorities will reserve the right to investigate incidents outside of these criteria if deemed appropriate.	Appendix D amended to include further text to clarify that there will be discretion on the implementation of this policy.

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Severn Trent Water	ST Q5	<p>- We expressed our views to Defra in the 'Delivering Sustainable Drainage' consultation in 2014 which set out (the then) draft proposals to deliver SuDs through the planning system.</p> <p>- We agree with the proposals for implementing SUDs as set out in Objective 4.</p> <p>- We would welcome the opportunity to work with this on developing a policy on urban creep.</p> <p>- We would also like to work closely with you to ensure are responses to planning authorities are aligned and consistent with yours as statutory consultee.</p>	Comments noted, urban creep allowances will be included in the Black Country SuDS Handbook.	No change
Severn Trent Water	ST Q7	<p>We do broadly agree with this, but we have concerns about what is meant by 'all relevant' flood risk information. For instance, there is information we hold that whilst we are happy to share with other RMAs, we feel would not be helpful or appropriate to put this in the public domain. We would welcome further discussion on this matter in particular if there are proposals to put information relating to Severn Trent Water and our activities / performance in the public domain. Also, we recommend that careful consideration is given to what information is made freely available as information about flood risk can be complex. Also, we also recommend not including Appendix E in the LFRMS without putting these locations in context. For instance, by explaining:- what assessments have been made? has the flood risk in these locations been quantified and prioritised? Is there a plan to reduce risk in these specific location? What actions have already been taken since these incidents to reduce flood risk?</p>	<p>Comment noted, we accept that certain information held by STW is commercially sensitive and not suitable for the public domain.</p> <p>The LFRMS does not specifically say that all relevant information will be published, this is only within the consultation survey. The Black Country Authorities will publish as much information as possible, while ensuring that personal information and commercially sensitive information is redacted where appropriate.</p> <p>The information in Appendix E is no different to that included within a SFRA. The locations are only a record of where has been flooded and this is appropriate to include.</p>	No change

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Severn Trent Water	ST Q9	<p>Yes we fully support the development of LLFA specific action plans to support the LFRMS.</p> <p>We recommend that the draft action plan in Appendix A is further enhanced by:-</p> <ol style="list-style-type: none"> 1. Including more specific information about timescales for delivery, including what 'on-going' means. 2. Including more information about the relative priorities of these actions 3. Clarify the proposed governance of these actions plans e.g. monitoring and reporting. 4. Provide a few more details on how the actions will be carried out on key actions such as "Develop a Flood Risk Management Plan for the West Midlands Cluster" e.g. by including more specific details in the table 	<p>Comments noted, the action plan has been reviewed to improve information on timescales.</p> <p>It is not appropriate to prioritise the actions against each other, some will occur routinely as they are statutory duties while others will be progressed wherever possible given time and budgetary constraints.</p> <p>The process for monitoring and reporting progress against the action plan is set out in Section 9 of the LFRMS.</p>	Action plan reviewed and enhanced to give greater clarity on timescales for implementation of actions.
Environment Agency	EA General	In general we feel that both the LFRMS and SEA cover the points we would expect to see and have incorporated some of our previous comments on the SEA scoping consultation. Please note that both the Severn and Humber River Basin Management Plans (RBMPs) have been updated and should be referred to as the most recent plan from Jan 2016 onwards. The RBMPs are due to be published on GOV.UK on 17th December 2015.	Comment noted, the RBMPs are yet to be published and therefore the LFRMS cannot refer to the updated versions.	No change
Environment Agency	EA LFRMS 1	The LFRMS document would benefit from the inclusion of more maps showing principle watercourses, current flood risk etc for each LLFA.	Comment noted, accepted a map of the main watercourse would be useful in the LFRMS. Maps of flood risk are not typically included in LFRMS as this is the role of the PFRA / SFRA and therefore inclusion in the alarms would be duplication.	No change
Environment Agency	EA LFRMS 2	Glossary: Suggest that you include a definition of LLFA here.	Comment noted and accepted	LLFA added to glossary.

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Environment Agency	EA LFRMS 3	Executive Summary: 2nd paragraph under 'What is Vision for Flood Risk' change 'Black County' to 'Black Country'.	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 4	1.1.1 Penultimate sentence should read '...with regards to local flood risk...'	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 5	1.1.2 First two sentences say the same thing.	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 6	3.2.3 2nd sentence, should it read '...north of Kingswinford...' or '...north to Kingswinford...'?	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 7	3.3.1 'Sandwell' is missing from first sentence.	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 8	3.3.3 Rivers in Sandwell do not flow into the River Avon. The River Stour flows into the River Severn. (There is another River Stour in Warwickshire which is a tributary of the River Avon).	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 9	3.5 The Wolverhampton section is inconsistent with the others as it does not include area or population figures.	Comment noted and accepted	Text changed, added area and population figures.
Environment Agency	EA LFRMS 10	3.6.4 The correct title for the national strategy is 'Flood and Coastal Erosion Risk Management Strategy for England' published by Defra in 2011.	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 11	3.6.6 The NPPF sets out the government's planning policies in England and how they should be applied.	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 12	4.3.1. Refers to Appendix B in relation to roles and responsibilities for flood risk management. Actual Appendix B is a list of relevant legislation.	Comment noted and accepted. There is no appendix with further details of roles and responsibilities.	Text changed
Environment Agency	EA LFRMS 13	4.3.3 Question whether these can still be regarded as 'new' responsibilities as they have now been in place for a number of years.	Comment noted and accepted, reference to 'new' removed.	Text changed
Environment Agency	EA LFRMS 14	4.3.4 The Environment Agency is responsible for managing flooding from main rivers and the sea and has a responsibility to provide a strategic overview for all flooding sources and coastal erosion. The National Flood and Coastal Erosion Risk Management Strategy for England outlines a national framework for flood and coastal risk management balancing the needs of communities, the economy and the environment.	Comment noted and accepted improvement to text of this section.	Text changed
Environment Agency	EA LFRMS 15	4.3.14 Delete 's' from 'recommendations' and 'the' before 'Highways England'.	Comment noted and accepted	Text changed

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Environment Agency	EA LFRMS 16	<p>4.3 Suggest that reference to RFCCs be added to the section on roles and responsibilities or elsewhere in the document if more appropriate.</p> <p>Regional Flood and Coastal Committees were established in accordance with the Flood and Water Management Act 2010 and are composed of elected members appointed by each LLFA and independent members appointed by the Environment Agency with relevant experience</p> <p>Committees have three primary functions:</p> <ul style="list-style-type: none"> • To ensure there are coherent plans for identifying, communicating and managing flood and coastal erosion risks across catchments; • To promote efficient, targeted and risk-based investment in flood and coastal erosion risk management that optimises value for money and benefits for local communities, and • To provide a link between the Environment Agency, Lead Local Flood Authorities, other RMAs, and other relevant bodies to engender mutual understanding of flood and coastal erosion risks in its area. <p>Sandwell, Walsall and Wolverhampton councils all have a seat on the Trent RFCC which is held by an elected member from each authority. Dudley Council has a seat on the English Severn and Wye RFCC. Local authority officers attend the meetings in a supporting capacity.</p>	Comment noted and accepted	Text changed to add RFCCs.
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Environment Agency	EA LFRMS 17	5. Expected this chapter to provide more of an overview about existing risk - include more detail about the number of people and property (residential, non-residential, critical infrastructure) currently at low, medium and high risk, ideally broken down by LLFA. This can then be compared with the figures at future risk in section 5.3.2. May be better presented in a table rather than text.	Comment noted, formal figures of the number of people and properties at risk is hard to establish, no property counting has been undertaken for the UFMfSW and this would be complicated by the work undertaken as part of the Sandwell SWMP and Thimble Mill Brook flood alleviation scheme that has refined flood risk modelling for the area. The figures presented in Section 5.3.2 are from the A Summary of Climate Change Risks for the West Midlands report which does not give comparative present day figures. Therefore any comparison would be problematic to establish.	No change
Environment Agency	EA LFRMS 18	5.1.2 What about surface water flooding in July 2012 which affected Wolverhampton and Walsall?	Comment noted and accepted.	Text added to Section 5.1.2 to highlight 2012 event.
Environment Agency	EA LFRMS 19	5.1.5 Would benefit from the inclusion of numbers of people or properties affected. Clarify whether the £50,000 quoted is a total damages figure or for the damages per property.	Comment noted, this is the value per property.	Text changed to clarify.
Environment Agency	EA LFRMS 20	5.1.6 Suggest that you make reference here to the balancing area at Sheepwash which reduces flood risk to Great Bridge as well as the River Tame flood defences which provide a 50 year (2%) standard of protection.	This is a main river scheme and therefore not appropriate to highlight here.	No change
Environment Agency	EA LFRMS 21	5.1.8 Would expect to see reference here to July 2012 surface water flooding which affected Wolverhampton and Walsall.	Comment noted, the impact of the 2012 event is noted in paragraph 5.1.10 through the description of the flooding from the Thimblemill Brook.	No change

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Environment Agency	EA LFRMS 22	5.1.10 Suggest that you include the number of properties at risk in Thimblemill Brook area identified by recent modelling work.	Comment noted and accepted.	Numbers of properties at risk from Thimblemill Brook added to Section 5.1.10
Environment Agency	EA LFRMS 23	5.1.12 Change 'heath' to 'health'.	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 24	5.2.2 Clarify which 'Borough' this is referring to.	Comment noted, this should refer to the Black Country	Text changed
Environment Agency	EA LFRMS 25	5.2.3 Change 'sewage' to 'sewerage'.	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 26	5.2.4 Change 'Balck' to 'Black'	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 27	5.2.6 2nd bullet, delete 'was' after 'Sandwell MBC'.	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 28	5.3 We would like to make you aware that revised climate change allowances will be published in autumn 2015. The allowances are being revised to reflect the latest climate projections in UKCP09 and wider flood risk research published since 2009. The main changes will be allowances for peak river flow and will be based on river basin districts. Until the allowances are published you can the allowances and guidance in 'Adapting to climate change: Guidance for flood risk management authorities' as a guide (but be aware that the allowances numbers for planners are likely to be slightly different).	Comment noted but the strategy cannot take into account unpublished guidance on climate change. The allowances will be updated in subsequent updated to the LFRMS.	No change

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Environment Agency	EA LFRMS 29	6. Wider environmental objectives have not really been covered, which is a requirement of the Flood & Water Management Act. For example working with natural processes for a more sustainable approach and the specific water-body objectives and measures set out in the Humber and Severn River Basin Management Plans. We would expect to see some reference to environmental objectives which could contribute towards managing local flood risk, for example, SuDS, enhancing biodiversity, habitat creation, creation of multi-functional green spaces (amenity, FRM, environmental benefits), blue / green infrastructure, seeking opportunities when consenting works on ordinary watercourses and contributing to the delivery of WFD targets etc. Consider if there are areas that would benefit from de-culverting and where river channels could be restored to a more natural state. For example where opportunities could be sought as part of regeneration proposals or new developments.	Comment noted, and accepted that the wider environmental objectives can be better represented in the LFRMS.	Additional measures and actions added to the LFRMS to cover wider environmental objectives.
Environment Agency	EA LFRMS 30	7.1.3 Maybe 'signpost' section 7.6 which gives examples/case studies for completed schemes?	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 31	7.2 LLFAs also receive direct funding for flood risk management through DCLG Local Services Support Grant (LSSG). See here for further information: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/480527/Funding_for_Flood_and_Coastal_Erosion_in_England_Dec_2015.pdf	Comment noted and accepted	Additional text added to Section 7.1.3 to illustrate additional funding LLFAs receive and what it is used for.
Environment Agency	EA LFRMS 32	7.3.1 Suggest you also include something along the lines of: 'Each RFCC annually sets the level of local authority funding that local authorities will contribute in the following year.'	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 33	7.3.2 1st sentence amend to read '...the English Severn and Wye RFCC and the Trent RFCC.'	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 34	7.4 Reference could be made to the use of private/voluntary contributions from organisations or individuals who would benefit from flood risk management projects.	Comment noted and accepted	Text changed
Environment Agency	EA LFRMS 35	7.4.5 Include details of whether the Black Country authorities have any plans/proposals to use CIL as outlined.	Comment noted, CIL will be used if possible to support flood risk management schemes, however no specific projects have been identified at this time.	No change

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Environment Agency	EA LFRMS 36	<p>7.4.8 We support the consideration of weir removal to provide multiple benefits to WFD and flood risk. The opportunity to incorporate WFD enhancements into schemes should be undertaken and opportunities should be integrated into schemes at the initial phase.</p> <p>WFD Funding – this paragraph is misleading. FCRM grant in aid (FCRM GiA) can only be spent on schemes where the primary purpose is flood risk management. However, other environmental benefits such as WFD should also be maximised where they are integral to the flood risk management work.</p> <p>It is possible that works which assist in meeting WFD targets, but which do not have the required flood risk management benefits may be eligible for WFD GiA or local levy funding.</p>	Comment noted. This section does not concern FCERM GiA but separate WFD GiA funding.	Text changed to make clear that this is WFD funding separate from FCERM GiA
Environment Agency	EA LFRMS 37	7.6.1 5th bullet point – where does this relate to? No location given.	Comment noted, this relates to lee Vale Road, Stourbridge	Text changed

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Environment Agency	EA LFRMS 38	<p>7.6.2 Due to the fluid nature of the ongoing investment programme, this section will require regular updating if the current format is maintained. It might be better to include less specific details or to provide a link signposting the reader to the 6 year investment programme on GOV.UK. https://www.google.com/maps/d/viewer?mid=zDIYgkD0zbyk.kkxJV47hNuMs</p> <p>It might be more appropriate for specific schemes from the programme to be included in the Action Plan. It would then be possible to add new schemes which come into the programme on an annual basis. The latest situation on the schemes you have referred to in section 7.6.2:</p> <ul style="list-style-type: none"> o West Bromwich, Sandwell Borough – We assume that you are referring to Sheepwash flood storage reservoir. We recently completed improvement works at Sheepwash flood storage reservoir. The aim was to halt erosion of the sides of the channel and re-establish the grass on the reservoir spillways. Rather than hard engineered solutions, we opted for a more sympathetic approach and installed rock amours to prevent erosion and allow a natural river habitat to thrive. We laid ‘Truckpave’ blocks made from recycled materials to reinforce the spillways before covering on top with topsoil and grass seed. o Upper Tame Holloway Bank – this scheme is being removed from the programme following issues arising from a pre-construction structural survey of adjacent buildings. We are not yet sure whether this scheme will re-commence at a later date or not. Therefore suggest that you remove this from the document. o Mushroom Green Dam, Dudley – The scheme is now unlikely to be completed until 2016/17. 	<p>Comment noted, it is felt that it is useful to highlight schemes that are currently being delivered to show what is actually happening on the ground. We accept that it will need to be updated regularly.</p> <p>Specific schemes have intentionally been excluded from the action plan as which come forward will change as study work is progressed and understanding of their relative priorities and feasibility is developed.</p>	Text changed following information on specific schemes
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Environment Agency	EA App A 1	Appendix A - Action Plan The action plan would benefit from the addition of priorities and clearer timescales.	Comment noted, timescales will be reviewed and updated if required to give greater clarity. It is not deemed appropriate to prioritise actions beyond giving a timescale.	Action plan reviewed and timescales updated.
Environment Agency	EA App A 2	2B – Actions should be linked with environmental opportunities which could provide match funding and bring added benefit to a scheme.	Comment noted and accepted.	Actions amended to highlight potential of environmental funding sources.
Environment Agency	EA App A 3	3C – Guidance should include advice on ‘sensitive’ maintenance of watercourses i.e. only removing woody debris where it is posing a flood risk. The guidance could make reference to the Environment Agency’s Living on the Edge publication	Comment noted and accept that need to be clear through guidance that maintenance should be sensitive to the environmental impact it may have within watercourses.	Actions amended.
Environment Agency	EA App A 4	4A – Any SuDS handbooks should provide advice on the multiple benefits that can be gained from SuDS such as wildlife habitat and increased amenity value as well as helping with flood risk.	Comment noted, multiple benefits will be included as part of the proposed SuDS handbook.	No change
Environment Agency	EA App A 5	4B – Development of a consenting process for ordinary watercourses should include an assessment of the environmental impact of any works and ensure local Authorities are fulfilling their duty under the NERC Act.	Comment noted, the consenting process will include assessment of the environmental impact of any works. It is not necessary to specifically highlight this in the actions as it is a legal requirement as noted.	No change

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Environment Agency	EA App B	<p>Appendix B – Relevant Legislation</p> <p>Appendix is incomplete without reference to the Floods & Water Management Act. Maybe give a high level overview of its purpose?</p> <p>You might find the following page on the LGA website useful with regards to summaries of relevant legislation: http://www.local.gov.uk/local-flood-risk-management/-/journal_content/56/10180/3572110/ARTICLE</p>	Comment noted, the FWMA is discussed in detail in Section 3.6 of the main document and therefore is not repeated in Appendix B.	No change
Environment Agency	EA App C	<p>Appendix C – Relevant Policy & Previous Studies</p> <p>Updates to the Severn and Humber River Basin Management Plans are due to be published on 17 December 2015 on GOV.UK. Further information can be found here: https://www.gov.uk/government/collections/river-basin-management-plan-update</p> <p>Suggest you also include reference to both the Severn and Humber Flood Risk Management Plans (FRMPs) which are due to be published on 17 December 2015 on GOV.UK. https://www.gov.uk/guidance/flood-risk-management-plans-what-they-are-and-whos-responsible-for-them</p>	Comment noted, the RBMPs and FRMPs are yet to be published and therefore the LFRMS cannot refer to the updated versions.	No change
Environment Agency	EA SEA	<p>We agree with the recommendations to include the consideration of environmental enhancements as part of the management of flood risk infrastructure and ensuring new development does not adversely affect WFD status.</p> <p>Please note that WFD implications for LFRMS go beyond water pollution and water levels as a change in river structure e.g. length of bank revetment or a control structure casing a barrier to fish movement has a real bearing on WFD objectives.</p>	Comment noted	Additional measures added to Objective 2 to further enforce the need to consider wider environmental objectives when undertaking flood risk management activities.

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Highways England	HE	<p>We would recommend that the following should be considered for inclusion within the strategy document.</p> <ul style="list-style-type: none"> - The importance of the maintenance of third party watercourses that interact with the SRN is stressed, in particular ensuring that culverts are not blocked (with silt). Any standing water on the carriageway presents a significant safety risk. - Safety, specifically to highway users is specified as an aim, or as a part of one of the existing aims. - The SRN (M5 and M6) is referenced within individual council context sections highlighting the importance of maintaining the operation and safety of the SRN. - The close interaction between the River Tame (and tributaries) with the M5 and M6 is recognised. 	Comments noted and accepted.	Additional text added to Section 4 on Highways England.
Dudley Metropolitan Borough Council - Highway Maintenance Manager	DMBC	<p>In the Strategy Action Plan we would like reference to Highway Drainage Assets, In particular:</p> <p>Dudley to achieve full compliance with the recommendations contained in the Department of Transport's Highway Maintenance Efficiency Programme Guide published 2012</p>	Comment noted, accepted that this would be a useful action under Measure 2D	Additional action added under Measure 2D for Black Country Authorities to achieve compliance with Department of Transport's Highway Maintenance Efficiency Programme Guide.

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Walsall MBC	WMBC 1	<p>Section 5.1.12 Walsall MBC (history of flooding). Could you please alter the text to read as follows:</p> <p>“The risk of flooding from watercourses is reasonably low in the Borough due to its location near the top of the River Tame catchment and a legacy of major culverting works, such as the tunnel carrying the Ford Brook under the Town Centre. Flooding that does occur from watercourses is most likely to be due to limited capacity in places or blockages. The steep and largely urban nature of the area makes the Borough prone to localised surface water flooding, which is complicated in many locations by the historic development and adoption of the receiving drainage networks.</p> <p>Whilst there is not one particular area of the Borough that suffers repeat and severe flooding, there are a number of flood hotspots distributed across the Borough that flood fairly frequently, such as the Darlaston Road area, Brickyard Road in Aldridge, the A461 Lichfield Road and Walsall Arboretum. Surface water has recently caused issues in various locations in 2008, 2010, 2012 and 2014. One of the most severe events was on the 28th June 2012 when thunderstorms caused widespread surface water flooding across the Borough and more widely across the West Midlands conurbation, Staffordshire and Derbyshire.”</p>	Comment noted and accepted	Text changed
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Black Country LFRMS Consultation Responses

WMBC 2	<p>Appendix C, under the title The Black Country Strategic Flood Risk Assessment (Jacobs, 2009), then Walsall</p> <p>The information about the Ford Brook only having a 5 year standard or protection for the Town Centre is not correct as work was undertaken following the SFRA to assess the flood risk further from the Ford Brook. It would be better to change to second and third bullet points to:</p> <ul style="list-style-type: none"> • The initial SFRA identified that the Ford Brook tunnel in Walsall Town Centre may only provide a limited standard of protection. However, follow on work to the SFRA (Halcrow, 2009) found that no properties flood in a 20 year return period event and few properties flood in a 100 year return period event. However in very extreme circumstances in a 1000 year return period event parts of Walsall Town Centre are at flood risk from the Ford Brook. • The Tame Tunnel provides a degree of flood protection to the Willenhall area 	Comment noted and accepted	Text changed
WMBC 3	<p>Appendix C, under the title, Walsall Preliminary Flood Risk Assessment (Walsall Council, 2011)</p> <p>For information, when Hannah did a detailed review of the information behind the PFRA, much of this was unreliable as some of the flood events referred to related to reports of blocked drains.</p> <p>She thinks it would be beneficial to run property counts using the latest surface water mapping for the Borough and present this information in the Strategy for all of the Boroughs.</p>	<p>Comment noted, it has been decided that this will not be undertaken at this point for the purposes of the LFRMS as it has not been undertaken and the Sandwell SWMP / Thimblemill PAR have produced more accurate modelling in those locations.</p>	No change
WMBC 4	<p>Appendix C, under the title, Walsall Preliminary Flood Risk Assessment (Walsall Council, 2011)</p> <p>This refers to Sandwell MBC at the moment</p>	Comment noted and accepted	Text changed