

<b>Transport and Place Scrutiny Panel</b>	<b>DATE</b> 03/10/24	<b>ITEM NO</b> 5
<b>SUBJECT</b> Lead Local Flood Authority update	<b>WARD (S)</b> All	
<b>CHIEF OFFICER</b> Director of Communities, Environment and Central	Climate Change, Environment and Transport	
<b>DECISION CLASSIFICATION</b> <i>Scrutiny Report</i>	N/A	

## SECTION I

### 1. Recommendations to decision maker:

- 1.1 To consider a report on the current status and future work programme of the Council related to flood risk and water management, and to make recommendations to the Executive, if necessary.
- 1.2 To agree that the report and any recommendations be submitted to the Chief Executive.
- 1.3 To note that the report and response to the recommendations of the Overview & Scrutiny Committee will be presented at the next meeting of the Committee.

### 2. Links to Our Greenwich Missions

- 2.1 This report relates to the Council's agreed missions as follows:
  - People's health supports them in living their best life
  - Everyone in Greenwich is safer, and feels safer
  - People in Greenwich have access to a safe and secure home that meets their needs

- It is easier, safer and greener to move around the borough and the rest of London
- Development delivers positive change to an area for existing and new communities
- Neighbourhoods are vibrant, safe and attractive with community services that meet the needs of local residents
- Greenwich plays an active role in tackling the climate crisis and improving environmental sustainability, in line with our commitment of being carbon neutral by 2030
- Town centres, high streets and shopping parades are vibrant, prosperous, well-maintained places that meet the needs of local people
- Our Council is better at listening to communities, and communities feel they are heard
- We develop networks with communities, key partners and businesses to meet need and address challenges together
- We design our services around the needs of our residents
- Our Council is an adaptive organisation, enabling it to navigate the increasing number of challenges it faces while remaining financially sustainable
- Our Council works in the most efficient and effective ways possible

### **3. Purpose of Report and Executive Summary**

This report advises on the current status and future work programme of the Council related to flood risk and water management. The report additionally provides an overview of the statutory responsibilities of the Royal Borough of Greenwich as a flood risk management authority and the role of partners (e.g. Environment Agency and Thames Water etc.) involved in flood risk reduction. This includes the role of Royal Greenwich as a local planning authority and a category one responder.

## **SECTION 2**

### **4. The Report**

#### ***Background***

In response to the floods in summer 2007, the government commissioned the 'Pitt review' to investigate the scale, causes, and impacts of the flooding.

Over 55,000 homes and 6,000 businesses were flooded and related insurance claims were approaching £3 billion by the end of 2007. The 'Pitt review' recommended the creation of the Flood and Water Management Act 2010 and Lead Local Flood Authorities. (LLFA)s are county councils, unitary authorities or borough councils. We lead in managing local flood risks (i.e. risks of flooding from surface water, ground water and ordinary (smaller) watercourses).

### **Challenges for Greenwich**

With regards to flood risk, Greenwich faces some unique challenges in comparison to other London Boroughs. These include:

- Thames Barrier – Although this is an Environment Agency asset, it directly impacts upon Greenwich residents. In particular, it has been identified that the Thames Barrier will need to be replaced by 2100. This will involve raising the height of the barrier, and moving it to a new downstream location.
- Thamesmead Area – Thamesmead is formed of former marshland, and largely sits beneath river level. It is artificially kept dry. There is significant housing stock in Thamesmead, which would be put at severe risk if a flood event were to occur.
- Greenwich has the longest river frontage of all London Boroughs, putting us at greater risk of flooding.
- Significant parts of the borough are classed as critical drainage areas, meaning that properties in these areas are at higher risk of flooding in the event of heavy rain downpours.

### ***Who is responsible for flood risk in the Royal Borough of Greenwich?***

Royal Borough of Greenwich has responsibilities for flood risk as a Lead Local Flood Authority, Local Planning Authority, Highways Authority and a Category One responder.

#### Our Flood Risk Responsibilities as a Lead Local Flood Authority:

As the Lead Local Flood Authority for the borough, we are responsible for managing flood risk from:

- surface water flooding
- groundwater
- ordinary watercourses, such as small rivers, streams, brooks, and ditches

#### Lead Local Flood Authority Duties

We have several duties that we fulfil as the Lead Local Flood Authority:

1. investigate significant local flooding incidents and publish the results of such investigations.
2. develop, maintain, apply and monitor a strategy for local flood risk management. Local flood risk is the risk of flooding from surface water, groundwater and ordinary watercourses. The council is required to produce and publish a Local Flood Risk Management Strategy (LFRMS) every six years, which outlines how the LLFA plans to manage flood risk for the area.
3. co-operating with other flood risk management authorities. Risk Management Authorities have a statutory co-operate with each other, act in a manner that is consistent with the National Flood and Coastal Erosion Risk Management Strategy for England and the local flood risk management strategies developed by Lead Local Flood Authorities, and exchange information. We have formed partnerships with the following Risk Management Authorities (RMAs):
  - Environment Agency
  - Neighbouring Lead Local Flood Authorities
  - Greater London Authority
  - Water and sewerage companies
  - Highways authorities.
4. ensuring new developments do not increase local flood risk
5. undertake a statutory consultee role providing technical advice on surface water drainage to local planning authorities on major developments
6. maintaining a flood risk asset register.
7. ensuring ordinary watercourses are free of blockages
8. granting consent for third-party works on ordinary watercourses
9. acting consistently with national flood and coastal erosion management strategies. For example:
  - Throughout much of the Thames Estuary, flood walls and embankments that protect property and infrastructure will need to increase in height by a metre or more by 2100 to offer adequate protection against tidal flooding.
  - The Royal Borough of Greenwich Surface Water Management Plan (SWMP) is a non-statutory document which can be used to identify the existing risk of surface water flooding. The SWMP also provides

a tool for the LLFA to identify options to manage risk, make informed investment decisions, and plan for the delivery of actions to manage flood risk.

### Lead Local Flood Authority Powers

To fulfil these duties LLFAs have several important powers to help them manage and mitigate flood risks effectively such as:

- undertaking works to manage flood risks from surface runoff and groundwater (section 14A of the Land Drainage Act 1991)
- designating structures and features that significantly affect flood risk (section 30 of the Flood and Water Management Act 2010)
- requesting information from any person about flood and coastal erosion risk management (section 14 of the Flood and Water Management Act 2010)
- civil sanctions that can be applied to individuals or organisations that do not comply with information requests (section 15 of the Flood and Water Management Act 2010)
- taking enforcement action where works on ordinary watercourses have been completed without our consent (Land Drainage Act 1991)
- taking enforcement action to maintain a proper flow of water on ordinary watercourses (Land Drainage Act 1991)

### Other Flood Risk Risk Responsibilities

In addition to our responsibilities as an LLFA, RBG has the following responsibilities with respect to Flood Risk:

#### Local Planning Authority Responsibilities

As a Local Planning Authority (LPA), we manage all planning applications for development in Greenwich. We ensure that all major planning applications are reviewed with regards to flood risk and surface water drainage. RBG has a responsibility to ensure that any development does not increase flood risk either upstream, downstream, or on-site.

#### Highways Authority Responsibilities

Royal Borough of Greenwich Highways teams are responsible for maintaining highway assets such as drains, kerbs, road gullies, ditches and

pipes up to the point where they connect to the public sewer network, at which point they becomes Thames Water's responsibility.

### Emergency Planning Team Responsibilities

The Royal Borough of Greenwich Emergency Planning Team administer the Council's role as a Category One responder and oversee the response to major incidents such as flooding, explosions, or large-scale evacuations. Category One responders have responsibilities under the Civil Contingencies Act (2004) when a major flooding incident is declared. They are directly involved in the management and delivery of the response.

Category One responders in the Royal Borough of Greenwich include:

- RBG
- Emergency Services (Police, Ambulance, Fire and Rescue Services)
- Environment Agency

A major flooding incident can be defined as flooding which endangers life, threatens serious damage to the environment, impacts a significant number of properties, or causes significant disruption to key parts of the infrastructure.

### **Other Risk Management Authorities**

#### Environment Agency

It's important to note that 20%-25% is defended by flood defences (Thames Barrier, a series of flood walls, and Sutcliffe Park), there is a need to work on the front foot with the Environment Agency to future plan and reduce the impacts of climate change. The Environment Agency (EA) are responsible for managing main rivers. The key duties of the Environment Agency include:

- Delivering flood risk warnings in partnership with the Met Office
- Managing the construction and maintenance of flood defences on main rivers
- Providing consent for and enforcement of works near to or within main rivers
- Producing guidance on Flood Risk Management Plans (FRMPs)
- Supporting other Risk Management Authorities (RMAs), such as the Greenwich Council, in the delivery of flood risk management projects as appropriate.

The EA-designated main rivers within and adjacent to the Royal Borough of Greenwich are:

- Butts Canal
- Deptford Creek
- Kid Brook
- The River Ravensbourne
- The River Thames
- The River Quaggy
- Wickham Valley Watercourse

### Thames Water

Thames Water are responsible for managing public sewers and ensuring their systems have sufficient capacity to cope with heavy rainfall and surface water runoff, as required. They are also responsible for maintenance of their sewer network.

The main roles of water and sewerage companies in managing flood and coastal erosion risks are to:

- make sure their systems have the appropriate level of resilience to flooding, and maintain essential services during emergencies
- maintain and manage their water supply and sewerage systems to manage the impact and reduce the risk of flooding and pollution to the environment. They have a duty under section 94 Water Industry Act 1991 to ensure that the area they serve is “effectually drained”. This includes drainage of surface water from the land around buildings as well as provision of foul sewers.
- provide advice to LLFAs on how water and sewerage company assets impact on local flood risk
- work with developers, landowners and LLFAs to understand and manage risks for example, by working to manage the amount of rainfall that enters sewerage systems
- work with the Environment Agency, LLFAs and district councils to coordinate the management of water supply and sewerage systems with other flood risk management work.

### Transport for London

Transport for London (TfL) has the duty to manage London’s public transport network. Under this role, TfL is also responsible for managing certain highway drainage and roadside ditches along TfL’s red routes under the Highways Act (1980). TfL’s red routes in Greenwich are:

- A2 (Blackheath Hill, Blackheath Road, Deptford Bridge, East Rochester Way, Shooters Hill Road)
- A20 (Eltham Road, Sidcup Road)
- A102 (Blackwall Tunnel Southern Approach)

- A205 (Grand Depot Road, South Circular Road, Well Hall Road)
- A210 (Eltham Road)
- A2204 (New Ferry Approach)
- A2213 (Kidbrooke Park Road)

### National Highways

National Highways are responsible for highway drainage and asset management of motorways. National Highways also identify areas at greatest risk of flooding through their Drainage Data Management System, helping to prioritise upgrades to the drainage system which may be required.

### **What is the borough doing to mitigate flood risk ?**

#### 1. Flood investigations

We have recently undertaken flood risk investigations under Section 19 of Flood and Water Management Act 2010 at Woodbrook Road in November 2022, and flood investigations are in progress for Kingsground, Plumstead High Street, Nathan Way and White Hart Road.

#### 2. Updating Local Flood Risk Management Strategy (LFRMS)

Our existing LFRMS expired in 2015. As an interim measure the objectives and its accompanying action plan sets out flood risk management flood risk objectives were reviewed and revised in 2022. Phase I of the new the Local Flood Risk Management Strategy (LFRMS) has been completed. The scoping exercise was completed by Flood Risk Consultancy Binnies. We aim to commission the new strategy in 2025, and the objectives will be developed and delivered in collaboration with risk management authorities, residents, and businesses.

#### 3. Cooperation with other Risk Management Authorities

We currently meet with the Thames Regional Flood and Coastal Committee on a quarterly basis and sit on the committee representing RBG, and the boroughs of Bexley, Lewisham and Bromley.

Water has no boundaries and the partnership facilities essential partnership working between the boroughs to reduce flood risk. The Royal Borough of Greenwich attends a monthly partnership call with the South East London Flood Risk Management (SELFRM) Group. The group consists of boroughs of Bexley, Bromley, Lewisham, and the Environment Agency, and Thames Water.



RBG attends the Thamesmead and Marsh Dykes Partnership and the Ravensbourne Catchment Partnership which is hosted by local river restoration charity Thames 21

A working group with Thames Water, RBG Highways Team, and the LLFA has been established since the first quarter of 2024 to jointly investigate flooding hotspots within the borough.

We also attend the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) Flood and Water Management Group and London Drainage Engineers Group (LoDEG) through which the Royal of Greenwich contributes towards the development national strategy and recently the production of London's Surface Water Strategy.

4. The flooding team and planning teamwork partnership to ensure development does not increase flood risk elsewhere enabling the authority to satisfy their flood risk obligations on the National Planning Policy Framework (NPPF). In addition to this RBG also completed a Level 2 Strategic Flood Risk Assessment (SFRA) 2019 to ensure that planned future development is at the lowest possible risk of flooding, where possible. We are working with the local plans team to produce a new in SFRA in 2025.
5. The flooding team play an important role in the planning system and support the delivery of green/blue development that best meets the needs of the local area through our role as a statutory consultee to the local planning authority. The number of planning applications we review has steadily grown; in 2020, we commented on 80 applications, and we are on track to comment on 220 applications for 2024/2025.
6. Our asset register is work in progress and we have recently developed a legal agreement with Thames Water enabling both organisations to share data. Thames Water have recently provided the authority with a GIS of their sewer network throughout the Royal Borough Greenwich. We have mapped locations for gullies, manholes, sewers, and flood defences within the Royal Borough of Greenwich in the asset register.
7. The Royal Borough of Greenwich is working on a Riverside Strategy with partners to enable opportunities for upgrading flood defences through planned developments. This Riverside Strategy will also facilitate the

creation of good public spaces, which will provide flood protection whilst being green, accessible, vibrant, and attractive. Riverside Strategies need to be in place by 2030 to enable future planning regarding flood defence upgrades in line with these visions.

8. The Royal Borough of Greenwich have been working with Metis to revise the existing Surface Water Management Plan (SWMP) and to develop a SuDS opportunity map to identify strategic locations where SuDS and flood alleviation schemes could be constructed to reduce flooding, and convert the grey to green. The creation of a SuDS opportunity mapping has the potential to provide the evidence base that is necessary to unlock partnership funding from Thames RFCC.
9. The Royal Borough of Greenwich recently completed a flood alleviation scheme in Clothworkers Wood in June 2024. The Clothworkers Woods scheme is a Natural Flood Management (NFM) scheme in the Shooters Hill area, designed to utilise Clothworkers Wood as a flood storage area for the Wickham Valley Watercourse through the creation of a wet woodland. The was commissioned as there is a high risk of flooding to Willow Dene School and the surrounding urbanised area. This is particularly due to the risk of blockages to the existing culvert inlet near the Willow Dene School. The Surface water flood map as shown below identifies approximately 30 properties at risk of flooding, predominantly along Edison Grove.
10. The Royal Borough of Greenwich successfully secured £1 million in funding from the Natural Flood Management Programme initiated by the Environment Agency and Defra in September 2023. The £25 million fund attracted over 600 applications, and 40 projects are set to benefit from this fund. 40 projects to benefit from £25 million funding for natural flood management - GOV.UK ([www.gov.uk](http://www.gov.uk))
11. Remedial works to streams. Since the flooding on Woodbrook Road. RBG has taken the lead and are regularly maintaining the river at the rear of Woodbrook Road to keep the grids and grilles clear of debris. The ownership of this asset remains unclear. RBG recently removed a river wall from the River Quaggy under the instruction from the Environment Agency. The river wall was knocked into the stream by the fire service and was causing an obstruction to flow.

12. The flood team also oversees Highways Drainage Infrastructure. Our future plan is to adopt a risk-based approach to asset management and to facilitate plan we are investigating options to purchase an asset management app called Karrbontech. It is envisaged through this app we can map both RBG's and Thames Waters network, and monitor silt levels, gully jetting and emptying. Our current programme is to maintain gullies annually, however this is not always the best approach as some gullies require emptying more frequently, and some do not requiring emptying for 4 years.

### **What and are the current and future challenges and barriers?**

#### Climate Change and aging infrastructure

We are facing more weather extremes in London and across the U.K, climate change is leading to heavier rainfall and extreme floods across the country. As well needing to adapt to the impacts of climate change, we are confronted with the challenges of aging infrastructure. The combined risks of climate change and aging infrastructure creates an environment for floods. These impacts can be reduced through installation of SuDS throughout the Royal Borough of Greenwich.

#### Policy and resourcing

Defra plan to Implement Schedule 3 of the Flood and Water Management Act 2010 in 2024. Schedule 3 will make sustainable drainage systems (SuDS) mandatory in new developments in England. The LLFA will become a SuDS Approval Body (SAB), and SuDS schemes will require approval from the local authority acting in its capacity as a SAB in addition to other permissions from planning and highways. All sites that meet the SAB approval thresholds will require a SAB approval to be in place prior to starting construction, New developments including Permitted Development (PD) and minor development require the use of SuDS. It will be mandatory for the authority to adopt SuDS schemes approved by the SAB.

#### Current resources

Prior to 2020, the flood service was managed by one member of staff and whilst we were delivering projects, we were not robust in responding to planning applications. The flood service was subsequently re-established, allowing the flood service to establish a pipeline of projects to deliver on top of our obligation to respond to planning applications. As part of the departmental re-organisation which is currently being implemented, we

expect to bring the service up to a resourcing level consistent with that of other local boroughs.

We will, in addition, continue to work with consultancy partners (primarily Metis and Aecom) when their technical expertise is required.

## 6. **Next Steps**

- 6.1 The Chair will set out closing remarks and make recommendations to the relevant decision maker as required at the meeting and these will be published as an appendix. The Relevant decision maker will respond to the recommendations in a separate published appendix and both will be brought back to the next meeting of the Committee/Panel.

## 7. **Cross-Cutting Issues and Implications**

<b>Issue</b>	<b>Implications</b>	<b>Sign-off</b>
<b>Legal</b> including Human Rights Act	The purpose of this report is to advise the Panel on the current status and future work programme of the Council related to flood risk and water management. As such, no decisions are required, and no legal implications arise.	Eleanor Penn, Assistant Head of Legal Services (Planning & Procurement), 20th September 2024
<b>Finance</b> and other resources	This report provides an overview of the statutory responsibilities of the Royal Borough of Greenwich as a flood risk management authority and the role of partners involved in flood risk reduction. This includes the role of Royal Greenwich as a local planning authority and a category one responder.  There are no direct financial implications arising from this report.	Sue Rock Accountancy Business Change Manager 19/09/2024

<b>Equalities</b>	<i>The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no apparent equality impact on end users. The Council's Equality and Equity Charter is integrated into all projects. Developing a best practice approach enables the authority to meet its obligations under the Council's Equality Objectives 2020 - 2024</i>	<i>Ashish Patel Flood Risk Manager 17/09/24</i>
<b>Climate change</b>	<i>This report supports the Greenwich Carbon Neutral Plan as the Lead Local Flood Authority encourages developers and partners to install Greener SuDS to provide biodiversity, amenity, water quality and quantity</i>	<i>Ashish Patel Flood Risk Manager 17/09/24</i>
<b>Community Engagement</b>	<i>No community engagement was conducted as part of this report</i>	<i>Ashish Patel Flood Risk Manager 17/09/24</i>

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