

Appendix 1: Consultation on the Southwark LFRMS SEA Scoping Report

Table 1 - Natural England Comments

SEA Scoping Report Consultation Response	Natural England
Contact Name	Franscesca Barker
Date Received	08 November 2012
Comment	Mouchel Response
<p>1 Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)</p> <ul style="list-style-type: none"> • There are no SSSIs that fall within the borough of Southwark. • There are no European sites (e.g. designated Special Areas or Conservation, Special Protection Areas and/or Ramsar Sites) fall within the scope of the Conservation of Habitats and Species Regulations 2010. 	No action required.
<p>2 Designated Landscapes and Landscape Character</p> <p>No protected landscape within the area, however local designations and local landscape character should be considered where appropriate.</p>	Noted. Southwark Council have confirmed that on a borough scale landscape character assessments have not been undertaken. Section 5.10.3 has been added that outlines the classification and size of Public Parks in the borough to give an indication of the character of open space on a local scale.
<p>3 Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010</p> <p>Where information exists on protected species particularly those not covered by a designated site or BAP habitat, this information should be used to inform the SEA.</p>	Noted. Section 5.4.4 has been amended to acknowledge the potential for the borough to contain protected species that are not covered by the BAPs or within a designated site. At this stage species listed in the Southwark BAP are sufficient to inform the SEA framework. However, projects that are implemented as a result of the LFRMS should be assessed to

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	determine impacts on protected and BAP priority habitats and species.
<p>4 Access and Recreation</p> <p>Natural England encourages any proposal to incorporate measures to help encourage people to access the nature for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.</p> <p>Flood storage and attenuation of surface water runoff in carefully selected locations will provide multiple benefits – including biodiversity, water quality improvements and green infrastructure. Solutions that incorporate the creation of green infrastructure and its multiple benefits should be considered.</p>	<p>Noted. Objectives 10 and 13 have been added. They will ensure the LFRMS protects and enhances green infrastructure and open spaces as well as increasing public accessibility.</p>
<p>5 Local Wildlife or Geological Sites</p> <p>The SEA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the Borough Ecologist, Local Record Centre or Wildlife Trust established for the purposes of identifying and selecting local sites; The SEA should therefore include an assessment of the likely impacts on the wildlife interests of the sites identified. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures.</p>	<p>Noted. The Local Sites baseline has been amended and confirmed as up to date by the Borough Ecologist. The measures in the LFRMS will be assessed against this objective in the SEA Report.</p> <p>Objectives 3 aims to ensure that Southwark’s LFRMS considers the protection and enhancement of biodiversity at all designated</p>

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	sites in the borough. The SEA Report will consider the likely impacts of the LFRMS on designated sites and any mitigation required.
<p>6 Other features of nature conservation interest, e.g. habitats and species identified within the UK and City/Borough Biodiversity Action Plans</p> <p>Opportunities for habitat creation and enhancement should be maximised, particularly in relation to BAP habitat. This might include new/existing wetlands, or river restoration (restoring more natural flows, bankside vegetation, and removing structures and impoundments where feasible).</p>	Objective 4 aims to ensure that Southwark's LFRMS seeks to promote the restoration and re-creation of habitats and species.
<p>Please note that the reference to plans and policies with regard to Biodiversity Strategy for England should now make reference to the Biodiversity 2020: A strategy for England's wildlife and ecosystem services rather than Working with the Grain of Nature: A Biodiversity Strategy for England (2011) Defra – see weblink Biodiversity 2020: A strategy for England's wildlife and ecosystem services</p>	Noted. Biodiversity 2020: A strategy for England's wildlife and ecosystem services has been added to the list of Plans, Programmes and Policies (PPPs) in Appendix 2 and Working with the Grain of Nature: A Biodiversity Strategy for England (2002) has been removed.
<p>7 Contribution to local environmental initiatives and priorities</p> <p>The SEA should consider how it might contribute to local environmental initiatives and priorities such as the objectives of Local Nature Partnerships encouraged by the Government through last year's Environment White Paper: The Natural Choice. London has received funding from the Department of Environment, Food and Rural Affairs (Defra) to undertake capacity-building to explore the role and remit of a Local Nature Partnership for London.</p>	Objective 4 aims to ensure that the LFRMS measures promote preservation and positive change in the local natural environment. Suggested indicators will measure the number of biodiversity enhancement schemes related to flood management schemes in the borough allowing an assessment of whether the flood strategy is contributing to local biological enhancement.

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<p>8 Cumulative and in-combination effects</p> <p>The SEA should include an assessment to identify, describe and evaluate the effects that are likely to result from the LFRMS in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment.</p> <p>(Subject to available information):</p> <ol style="list-style-type: none"> a. Existing completed projects b. Approved but uncompleted projects c. Ongoing activities d. Plans or projects for which an application has been made and which are under consideration by the consenting authorities e. Plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects. 	<p>Noted. The review of PPPs considered the possibility to interact cumulatively with the predicted effects of the LFRMS. The assessment has identified potential cumulative and synergistic effects associated with the adoption of the strategy (as reported in Section 3.2 and 6.3.9 of the Environmental Report).</p> <p>At this stage the Strategy outlines potential strategic measures that could be implemented.</p> <p>Given the nature of this Strategy and the limited information it is not possible to identify the cumulative effects relating to individual projects that may or may not be progressed within the Borough.</p> <p>It should be noted that any individual project which is progressed within the Borough will be subject to assessment against and compliance with the LFRMS. This includes a requirement to implement measures to manage flood risk at a project level.</p>

Table 2 - Environment Agency Comments

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Question 1. Have all relevant plans and programmes been considered?	
<p><u>Additional plans, policies or programmes which the Council should consider</u> We collect key evidence for information and influencing plans. This information covers a wide range of environmental determinants and can be used to influence the policies and implementation of local plans. For more detail please visit: http://www.environment-agency.gov.uk/research/library/data/34331.aspx</p> <p>For the most up to date and accurate environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage. http://www.geostore.com/environment-agency/</p>	<p>Noted. The Environment Agency corporate strategy evidence has been reviewed to inform the SEA framework and provide wider context for the environmental baseline and key issues within Southwark.</p>
<p>There are a number of new publications, legislation and strategies which we feel should be included in Appendix A - Task A1: Identifying Relevant Policies, Plans and Programmes. These are detailed below. We feel the report will be further strengthened by including these links.</p>	<p>No action required.</p>

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<p>National Flood Emergency Framework In planning and preparing for a flooding emergency, the Government’s strategic objectives are to:</p> <ul style="list-style-type: none"> • protect human life and alleviate suffering; and, as far as possible, property and the environment; • support the continuity of everyday activity and the restoration of disrupted services at the earliest opportunity; and • uphold the rule of law and the democratic process. <p>The National Flood Emergency Framework is intended to cover the development, maintenance, testing and, when necessary, implementation of operational response arrangements that are:</p> <ul style="list-style-type: none"> • able to respond promptly to any changes in alert levels; • developed on an integrated basis, combining local flexibility with national consistency and equity; • capable of implementation in a flexible, phased, sustainable and proportionate way; • based on the best available scientific evidence; • based on existing services, systems and processes wherever possible, augmenting, adapting and complementing them as necessary to meet the unique challenges of a flood emergency; • understood by, and acceptable to, emergency planners and responders; • designed to promote the earliest possible return to normality. <p>http://www.defra.gov.uk/publications/2011/06/08/pb13430-national-flood/</p>	<p>Noted. The Framework has been considered and added to the reviewed PPPs in Appendix 2.</p>
<p>Civil Contingencies Act 2004 (CCA) Legislation that aims to provide a single framework for civil protection. The Act and accompanying non-legislative measures, delivers a single framework for civil protection in the country.</p> <p>The National Flood and Coast Erosion Management Strategy (July 2011) require communities to prepare flood action plans and link with the Cabinet Office’s initiative to develop wider community resilience to</p>	<p>Noted. This is considered to be relevant to the LFRMS and the Council’s responsibilities as the Lead Local Flood Authority, rather than the SEA.</p>

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<p>threats and hazards.</p> <p>Part 1 of the Act and supporting regulations and statutory guidance establish a clear set of roles and responsibilities for those involved in emergency preparation and response at the local level. They are required to:</p> <ul style="list-style-type: none"> • assess the risk of emergencies occurring and use this to inform contingency planning; • put in place emergency plans; • put in place Business Continuity Management arrangements; • put in place arrangements to make information available to the public about civil protection matters and maintain arrangements to warn, inform and advise the public in the event of an emergency; • provide advice and assistance to businesses and voluntary organisations about business continuity management (Local Authorities only); • share information with other local responders to enhance co-ordination; and • co-operate with other local responders to enhance co-ordination and efficiency <p>http://www.cabinetoffice.gov.uk/content/civil-contingencies-act</p>	
<p>Localism Act</p> <p>Planning and regeneration provisions will provide for neighbourhood development orders to allow communities to approve development without requiring normal planning consent. Local authorities, the Environment Agency and other prescribed bodies are obliged to work together on certain strategic matters under the 'duty to cooperate' in the Localism Act in England. In particular, these organisations should cooperate across boundaries because flood risk often requires wider than local consideration.</p> <p>The Localism Act also requires lead local flood authorities (LLFAs) to make arrangements for overview and scrutiny committees to review and scrutinise risk management authorities. Risk management</p>	<p>Noted. This is considered to be relevant to the LFRMS and Council's responsibilities as the Lead Local Flood Authority, rather than the SEA.</p>

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<p>authorities are now under a duty to comply with a request made by an overview and scrutiny committee for information or a response to a report in relation to its flood or coastal erosion risk management functions.</p> <p>The act also makes provision for committee system local authorities that are lead local flood authorities to review and scrutinise the exercise by risk management authorities of flood risk management or coastal erosion risk management functions which may affect the local authority's area. Find out more on the Dept for Communities and Local Government (DCLG) website: Localism Act.</p>	
<p>Building regulations The Department for Communities and Local Government is responsible for policy on Building Regulations. These exist to ensure the health, safety, welfare and convenience of people in and around buildings.</p> <p>Part H of the Building Regulations specifically covers drainage. It strongly recommends a more sustainable approach to surface water management with a hierarchy that suggests disposal to watercourses and sewers is the last resort.</p> <p>There is no current advice directly on flood risk in the Building Regulations, with some references to the management of moisture and contamination should there be flooding.</p> <p>Sir Michael Pitt's review of the 2007 flooding suggested that Part H of the Building Regulations should be amended to include property level flood resilience and resistance measures. A number of measures have been included to help reduce flood risk including that:</p> <ul style="list-style-type: none"> • the requirement of planning permission to pave over front gardens with impermeable surfaces • the Flood and Water Management Act calls for new developments to no longer connect directly to sewerage systems for surface water runoff. Instead sustainable drainage systems (SuDS) are encouraged. 	<p>Noted. The Regulations has been considered and added to the reviewed PPPs in Appendix 2.</p>

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<p>The Code for Sustainable Homes Produced by the Department for Communities and Local Government, the Code for Sustainable Homes is the national standard for the sustainable design and construction of new homes.</p> <p>The code is not mandatory, but under certain circumstances it can be required; where Local Authorities stipulate a requirement in their local plans, or where affordable housing is funded by the Homes and Community Agency, who require homes to be built to Code Level 3.</p> <p>The code is configured into a number of categories and issues, with Category 4: Surface water run-off having two issues: Sur 1 – which deals with the management of surface water run-off from developments, and Sur 2 – which deals with flood risk.</p> <p>More about the Code for Sustainable Homes – on the Communities and Local Government website</p>	<p>Noted. The Framework has been considered and added to the reviewed PPPs in Appendix 2.</p>
<p>Surface Water Management Plans</p> <p>The 2007 floods highlighted the need for better planning and management of surface water flood risks.</p> <p><u>Who will lead on producing Surface Water Management Plans?</u> Government have decided that county council and unitary authorities should lead and coordinate the production of Surface Water Management Plans (SWMPs) that consider flood risk from surface water, groundwater and ordinary watercourses.</p> <p>SWMPs will underpin in taking the lead on managing flooding from surface runoff, as well as groundwater and ordinary watercourses where relevant. The plan includes an assessment of flood risk from these sources and a programme of actions to manage these risks.</p>	<p>Noted. Southwark Council’s Surface Water Management Plan (2011) has been considered and added to the list of PPPs in Appendix 2.</p>

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<p><u>What will SWMPs do?</u> SWMPs will help county councils and unitary authorities, plus their supporting partners understand and manage local flood risk. They will help put in place:</p> <ul style="list-style-type: none"> • coordinated and prioritised investment strategies and asset management; • support for greater use of Sustainable Drainage Systems (SuDS) to help avoid large investments in unsustainable hard infrastructure; • identify design approaches that avoid and reduce flood risk to and from new development (PPS 25); • information to improve emergency planning decisions for local authorities and awareness of surface water flooding when preparing for emergencies. <p>http://www.defra.gov.uk/environment/flooding/manage/surfacewater/plans.htm</p> <p>http://www.defra.gov.uk/publications/2011/06/10/pb13546-surface-water-guidance/</p>	
<p>Other useful guidance and strategies The voluntary Code of Practice (CoP) (Definition of Waste: Development Industry Code of Practice) Produced by industry it provides a framework for determining whether or not excavated material used in land development is waste. The CoP sets out good practice for the development industry to use when assessing:</p> <ul style="list-style-type: none"> • if materials are classified as waste or not; and • determining when treated waste can cease to be waste for a particular use. <p>It also describes an auditable system to demonstrate that the Code of Practice has been adhered to on a site by site basis.</p> <p>http://www.environment-agency.gov.uk/static/documents/Leisure/PS006.pdf http://www.nhbc.co.uk/Productsandservices/ConsultancyandTesting/LandQualityEndorsement/documents/</p>	<p>Noted. The Code of Practice has been considered and added to the reviewed PPPs in Appendix 2.</p>

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<p>London River Restoration Action Plan (LRRAP).</p> <ul style="list-style-type: none"> The London River Restoration Action Plan is a Collaborative led by the Agency to facilitate a programme of river restoration across the whole of London. The objectives are to facilitate and track progress towards the delivery of London Plan London River Restoration targets for 2015 and 2020. (15km 2015 and 25km by 2020). The plan comprises of a document, providing background, maps and case studies and a Website containing maps, directory of projects including completed and developing projects and detailed case studies and links to best practice and policy 	Noted. The Plan has been considered and added to the reviewed PPPs in Appendix 2.
<p>Guidance on producing Preliminary Flood Risk Assessments</p> <p>This Guidance provides information to help Lead Local Flood Authorities, which are County and Unitary Authorities to meet duties to prepare Preliminary Flood Risk Assessments, as required by the Flood Risk Regulations 2009 (the Flood Risk Regulations)</p> <p>http://publications.environment-agency.gov.uk/pdf/GEHO0410BSLS-E-E.pdf</p>	This is considered to be relevant for the Council to consider in the production of their Preliminary Flood Risk Assessments, rather than this SEA.
<p>London Borough of Southwark Strategic Flood Risk Assessment (SFRA)</p> <p>The SFRA recognises that properties and infrastructure within the London Borough of Southwark are also at risk of flooding from other sources. These include surcharging of the underground sewer system, the blockage of culverts and gullies (which results in overland flow), and surface water flooding. Evidence of localised flooding of this nature has been captured through consultation with local authorities, Thames Water and the Environment Agency.</p> <p>www.southwark.gov.uk/download/2551/part_1</p>	Noted. The Framework has been considered and added to the reviewed PPPs in Appendix 2.

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<p>Strategic Environmental Assessment and Climate Change: Guidance for Practitioners</p> <p>This guidance suggests how climate change issues can be considered in SEA in England & Wales. The original guidance was launched in 2004, and this revised version has been updated in 2007 and compliments advice set out in UK Practical Guide to the SEA Directive.</p> <p>The guidance provides practical guidance on ways SEA can consider climate change and should be applied to Waste Management Strategy. The guidance is available at: http://www.environment-agency.gov.uk/commondata/acrobat/seaccjune07_1797458.pdf</p>	<p>Noted. This guidance was used during the SEA. An indicative list of guidance used is provided in Section 3.1 of the SEA Report.</p>
<p>Drain London Project</p> <p>Drain London will aim to manage and reduce surface water flood risk in London by improving knowledge of the surface water drainage system and identifying areas at greatest risk of flooding. http://www.london.gov.uk/drain-london</p>	<p>Noted. The Drain London project has been considered and added to the reviewed PPPs in Appendix 2.</p>
Question 2. Does the baseline information reflect the current situation in the LFRMS area or are there additional social, environmental or economic factors that should be considered?	
<p>The SEA Scoping Report appears consistent with the National Flood Risk & Coastal Erosion Management Strategy (NFCERMS), produced by the Environment Agency. This is in line with the additional sections of the Flood and Water Management Act which came into force in July 2011 after the government laid a commencement order before parliament. These require local planning authorities to exercise their flood management functions in line with the Environment Agency's flood and coastal erosion strategy. The order also gives councils more powers to carry out works to manage groundwater and surface water flooding.</p>	<p>No action required.</p>
<p>We question the accuracy of the statement in paragraph 5.6.2 that attributes flooding in 2005 to non</p>	<p>Noted. The information originated from the</p>

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closure of Thames Barrier. Our asset management team would wish to know where this information originated from.	<p><i>Southwark Preliminary Flood Risk Assessment (2011) Table 4-1 Past Floods & Consequences, where it states:</i></p> <p>'The Thames Barrier which normally protects the London Borough of Southwark from tidal flooding, was not shut, and sufficient warning was not provided to local residents close to the floodgates prior to the onset of flooding, causing flooding along the Southwark frontage and into some basements to a depth of between 4 and 6 inches (according to Report on Planning 188 Southwark Council March 2009 as referenced in Southwark LCLIP Report).</p> <p>The Preliminary Flood Risk Assessment is available at: http://modern.gov.southwark.gov.uk/mglssueHistoryHome.aspx?lId=15666&optionId=0/oPreliminary%20Flood%20Risk%20Assessment</p>
<p><u>Flood Risk Management: Resilience Buildings and infrastructure</u> In many cases a great deal of damage and upheaval is caused by relatively shallow depths of flooding in buildings. To avoid this for new buildings, sound planning should ensure that properties are built with ground floor levels at a locally specified height to achieve satisfactory flood protection. This is a very</p>	<p>Noted. During Stage A of SEA process we have considered the current and likely future baseline. Housing and homes have been identified as being potentially effected by the LFRMS in Section 5.8.3.</p>

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<p>simple and low cost action that is easy to carry forward into general design practice.</p> <p>In existing buildings bespoke solutions may be appropriate to prevent water entering the building. For instance, while sandbags may still have a role, more robust and more watertight means of protecting external doorways from ingress of flood water are now available.</p> <p>If flood water cannot be kept out of a building, then damage and the burden of recovery can be significantly reduced if furnishings are easily removable and reliable flood warnings can be given.</p> <p>Resilience of electrical and telecoms installations may also be increased by raising the level of power sockets and switchboards.</p>	
<p>It is also important to consider resistance and resilience for critical infrastructure. Critical infrastructure comprises 'those facilities, systems, sites and networks necessary for the functioning of the country and the delivery of the essential services upon which daily life depends'. Measure to reduce flood risk should be adopted as an integral part of any critical infrastructure owner's business plan.</p> <p>The importance of communication networks should not be underestimated. In particular, mobile phone networks nowadays form a key aspect of communication during emergency and recovery situations. It is therefore important that the siting of key mobile phone infrastructure has high resilience from direct flooding and also from loss of electrical supply due to flooding.</p>	<p>Noted. Critical infrastructure in the borough is identified in sections 5.7 Population and Human Health and 5.8 Material Assets. Section 5.8.2 has been added to clarify the importance of critical infrastructure including utilities (e.g. clean water, electricity supply, telecoms network) and access to community care facilities (hospitals or health centres)</p> <p>Objective 15 of the SEA Framework aims to ensure that the impact of flooding on existing and future critical infrastructure is considered in the LFRMS.</p>

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<p><u>Highways and roads</u></p> <p>Many developments are built with ground floor levels lower than adjacent highways. This creates a situation of vulnerability. This can be the case in flat, low lying areas where the highway construction thickness results in the finished surface of the highway becoming elevated above adjacent building plots. This can be avoided at the design phase.</p> <p>Such cases are also common in hilly areas where a highway may run along a contour and the development on one side is lower.</p> <p>Properties on the low side may be vulnerable to flooding from an event as simple as a highway gully becoming blocked. The ponding water will flow over the kerb at a vehicle access point to a property. Clearly this sort of flood risk is easily avoidable in the design of new property, but can be a difficult issue to resolve in established areas.</p> <p>Key infrastructure – such as electricity sub-stations, telecoms installations and water pumping stations – should be located so that they are secure from significant flood risk.</p> <p>The role of planning and the effective communication of flood risk are key factors in achieving this resilience. In practice, this may be as simple as building up ground levels locally.</p>	<p>Noted. Critical infrastructure in the borough is identified in sections 5.7 Population and Human Health and 5.8 Material Assets. Section 5.7.3 identifies the travel network within Southwark. Section 5.8.2 has been added to clarify the importance of critical infrastructure including utilities (e.g. clean water, electricity supply, telecoms network) and access to community care facilities (hospitals or health centres)</p> <p>Objective 15 of the SEA Framework aims to ensure that the impact of flooding on existing and future critical infrastructure is considered in the LFRMS.</p>
<p><u>Public transport systems</u></p> <p>Main transport systems – such as railways, transit systems, canals and principal roads – should also be developed and managed with regard to flood risk. Careful design and appropriate retrofits are capable of improving resilience and so avoiding the loss of public transport in what may be a relatively minor flood event.</p>	<p>Noted. Critical infrastructure in the borough is identified in sections 5.7 Population and Human Health and 5.8 Material Assets. Section 5.7.3 identifies the travel network within Southwark Objective 15 of the SEA Framework aims to</p>

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<p>Sometimes flood water runs off other impermeable surfaces in an urban area and may access a transport system at only one low spot, but nevertheless cause widespread disruption. It is good practice to consider reliability, availability, maintainability and safety/security (RAMS) in the design of major transport infrastructure. This work should include flood risk, management of surface water and exceedance flood routing</p> <p>It may be possible to adjust local ground levels or construct small scale flood walls to deflect a flood route from a railway into an area which has a less critical use. Canals should have detailed consideration as they may be elevated and a source of flood risk to adjacent property.</p> <p>Where flooding from watercourses or surface water sources occurs, the impacts may be worsened by foul water flooding. This may be caused by surface water entering foul drainage systems through yard gullies or other ground-level gratings.</p> <p>The risk of foul flooding in such circumstances may be reduced by more 'defensive design'</p>	<p>ensure that the impact of flooding on existing and future critical infrastructure is considered in the LFRMS.</p> <p>Objective 15 of the SEA Framework aims to ensure that the impact of flooding on existing and future critical infrastructure is considered in the LFRMS.</p>
Question 3. Do the issues identified in this report cover all the significant environmental and sustainability issues relevant to the LFRMS area?	
<p>Flood risk management requires coordination of a variety of actions, including planning of developments, land management, flood warning, community involvement and structures to reduce flood risk. Since actions that affect one part of a river can have consequences elsewhere, flood management measures are most effective when they are carried out in a coordinated way throughout a catchment. Catchments are the ideal base for a flood management approach that examines the processes of runoff and storage and hence the causes of flooding. They are also a practical management unit for integrating biodiversity</p>	<p>This is considered applicable to the Strategy, rather than the SEA.</p>

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protection, industry, housing and transport in a sustainable manner.	
<p>Under paragraph 5.6 <i>Water</i> there is need to include the following:</p> <p><u>Role of Environment Agency in Climate Change</u> The Environment Agency has taken on a new role as the Government’s delivery body in England to help organisations adapt to climate change. This role will build on the work of the UK Climate Impacts Programme (UKCIP), based at Oxford University. The Environment Agency will provide advice and support to key sectors to help them build resilience to climate change.</p> <p>Climate change will create opportunities and risks for local authorities. For example, warmer summers may lead to increased demand for leisure and tourism related services, whilst wetter winters will increase pressure on drainage systems. Climate change could have an impact on the following council services: emergency planning, building control, land use planning, local flood and coastal risk management , provision of local infrastructure and green spaces, provision of schools; environmental services including waste management, pollution control and monitoring and environmental health, transport infrastructure and the local natural and historic environment.</p> <p>The council role as estate manager and service provider plays a vital part in ensuring that adaptation is taking place at a local level. For more information please visit http://www.ukcip.org.uk/government/local-authorities/. The council should require development proposals to take account of the expected changes in local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future adaptation. Information on these measures must be submitted with an application. Specifically, the council should require major developments to:</p>	<p>Noted. This has been updated in line with the comments received in a dedicated Climatic Factors - Section 5.2. A reference to the climate change section has been added to the individual topic section.</p>

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<ul style="list-style-type: none"> • identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development, • identify the potential impacts of these changes on the proposed development and its neighbours, • indicate the ways in which the proposed development design overcomes the hazards and exploits the opportunities associated with these impacts whilst meeting other sustainable development criteria, particularly the need to achieve overall reductions in greenhouse gas emissions <p>More can be done by addressing potential infrastructure capacity issues associated with climate change and the potential costs of adapting to climate change. This can be reduced by building resilience into major infrastructure, such as new buildings or roads. This is likely to be a staged process, taking effect:</p> <ul style="list-style-type: none"> • when infrastructure is upgraded • when local development documents or other plans come up for regular review • when assessments are undertaken as part of a wider sustainability review • before service providers are forced to act by a sudden event or mounting maintenance cost 	
<p><u>Environment Agency role in drought</u> We are responsible for monitoring, reporting and acting to reduce the impact of drought on the environment. We work with water abstractors (such as water companies, farmers and industry) to manage the demand and availability of water and decide whether water company applications for drought permits are reasonable. We have drought plans for all of England and Wales. These set out how we will manage water resources during a drought. These plans aim to balance the competing interests of the environment and the need for public water supply. They contain a range of environmental indicators that determine the action we will take to achieve this aim. See http://www.defra.gov.uk/environment/climate/</p>	<p>Noted. Climate Change and Water Resources has been included in Section 5.2.4. This outlines the potential for reduced water availability in the summer months due to the effects of climate change.</p>

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<p>For wildlife sites that contain protected species or have a National/European wildlife designation, then Natural England should be involved as well.</p> <p><u>What we do during a drought</u> During a drought, we step up our monitoring actions to make sure that we continue to protect the environment from harm. Our ongoing work with water companies, and other water users such as farmers, means they have their own plans in place to cope with hot dry spells. We make sure that they do not take too much water from rivers and that they are following their drought plans. We deal with drought permit applications from water companies to allow them to continue abstracting water during drought. The environmental impact and public water supplies are important considerations when deciding whether to grant these applications. Our other key responsibility is to report on the state of water resources during a drought to the public, government and our partners. More details can be accessed via http://publications.environment-agency.gov.uk/PDF/GEHO0911BUDJ-E-E.pdf</p>	
<p><u>Water Demand Management</u></p> <p>Rainwater harvesting can be a useful means of enhancing water supplies and reducing the demand on water resources. Rainwater harvesting also has the potential to contribute to the improved management of surface water run-off. However, we consider that:</p> <ul style="list-style-type: none"> • each proposal should be examined on a case by case basis. • the effectiveness of rainwater harvesting schemes varies considerably and depends on the sector and scale. • simple water efficiency measures should always be considered before rainwater harvesting. 	<p>Noted. During Stage A of the SEA process we have considered the current and likely future baseline. The SEA Report identifies potential adaption/ mitigation measures, where appropriate.</p>

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An overview of our position on Rainwater Harvesting can be found at http://publications.environmentagency.gov.uk/PDF/GEHO0611BTYB-E-E.pdf	
<p><u>Water Stress</u></p> <p>The borough will require the highest level of water efficiency activity and therefore more stringent water consumption targets than those set out by Building Regulations, which may be adequate for other parts of the country. Other useful links:</p> <ul style="list-style-type: none"> • Areas of water stress: final classification - http://publications.environment-agency.gov.uk/PDF/GEHO1207BNOC-E-E.pdf • Water resources in England and Wales - current state and future pressures December 2008 http://publications.environment-agency.gov.uk/PDF/GEHO1208BPAS-E-E.pdf • Water for people and the environment Water Resources Strategy for Southern Region http://publications.environment-agency.gov.uk/PDF/GEHO1209BRLC-E-E.pdf • Water for people and the environment Water Resources Strategy for England and Wales – Feb 2009 http://publications.environment-agency.gov.uk/PDF/GEHO0309BPKX-E-E.pdf 	Noted. During Stage A of the SEA process we have considered the current and likely future baseline. The SEA Report identifies potential adaption/ mitigation measures, where appropriate.
<p><u>More information sources</u></p> <p><u>DataShare</u></p> <p>You can find up-to-date evidence and data on the Data Share service. Please register as a WFD Co-deliverer to access data on local waterbodies:</p> <p>www.geostore.com/environmentagency/WebStore?xml=environment-agency/xml/application.xml</p>	Noted.

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<p><u>Local State of the Environment Reports</u> You can find information and evidence in the regional State of the Environment Reports. They contain key information, data and statistics about many environmental opportunities including biodiversity and habitats. www.environment-agency.gov.uk/research/library/publications/34019.aspx</p>	Noted.
Question 4. Do the SEA objectives reflect the right aspirations for development of more sustainable approaches to surface water management?	
<p><u>Southwark Strategic Flood Risk Assessment (SFRA)</u> The Southwark Strategic Flood Risk Assessment (SFRA) acknowledges that given the heavily urbanised character of much of the borough, it is inevitable that localised flooding problems arising from under capacity drainage and/or sewer systems will occur, particularly given the mounting pressure placed upon ageing systems as a result of climate change.</p> <p>Furthermore, sewer systems are generally designed (in accordance with current Government guidance) to cater for the 1 in 30 year storm, and highway soakaways are generally designed for only 1 in 10 year storms. Storms over and above these design events will exceed the drainage system, resulting in overland flow, often in an uncontrolled manner, resulting in localised flooding.</p>	This is considered applicable to the Strategy, rather than the SEA.
<p><u>Areas susceptible to surface water flooding in the borough</u> The Environment Agency's surface water flood maps give an indication of the broad areas likely to be at risk of surface water flooding. However, Environment Agency surface water flood maps are not suitable for identifying whether an individual property will flood.</p> <p>This is because the modelling only gives an indication of broad areas at risk, and because we do not hold information on floor levels, construction characteristics or designs of properties. We would need this and other detailed information to be able to say whether flooding of certain depth would enter into an individual</p>	Noted. Removed reference to numbers of individual properties that are estimated to be flooded, and maintained Figure 5.6 Flood Map for Surface Water to give an indication of the areas at risk within Southwark.

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<p>property and cause damage.</p> <p>They may be suitable for identifying where properties are in areas at risk of flooding for locations where surface water flooding is strongly influenced by topography. Each map can only give an indication of areas at risk from surface water flooding from a national assessment. They cannot provide detail on individual properties. Therefore the information should not be interpreted as showing that the location you are interested in will or won't actually flood, but simply that it is in or not in an area shown at risk on the maps. For more information please visit: http://www.environment-agency.gov.uk/research/planning/109490.aspx</p>	
<p><u>Drain London project</u> The Flood and Water Management Act requires boroughs to investigate (by 2015) and address flood risk problems and maintain a public register of Flood Risk Management assets. Boroughs are the Lead Local Flood Authorities (LLFAs) and have full responsibility for managing flood risk from surface water, groundwater and ordinary watercourses.</p> <p>Once Drain London finishes, each London Borough will have to investigate (by 2015) measures to address remaining flood risk problems and develop and maintain a public register for Flood Risk Management Assets.</p> <p>The Drain London Forum will continue to help boroughs with their responsibilities for managing flood risk by providing guidance on asset registers, helping to form multi-agency partnerships and sharing good practice, knowledge and expertise. Under the Flood Risk Regulations 2009 LLFAs are also responsible for assessing, mapping and planning for local flood risk, and any interaction these have with drainage systems and other sources of flooding, including from sewers. Water companies will work with LLFAs to help manage surface water flooding.</p>	<p>Noted. The LFRMS will satisfy the requirements of the Drain London project and The Flood and Water Management Act.</p>

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<p><u>Community Infrastructure Levy and Surface Water Management</u> The Flood and Water Management Act gives councils more powers to carry out works to manage groundwater and surface water flooding. It is our intention to use proposals for Community Infrastructure Levy charging schedules to secure funding for FCRM schemes that are unlikely to be wholly funded through Central or Local government funds. The management of the drainage systems and associated flooding is the responsibility of several bodies, making the risks of flooding even more complex. The Government recognises that in planning for prosperity adequate infrastructure needs to be provided (NPPF para 7) and the Local Plan has a crucial role in this (Para 157). The CIL is seen by Government as a key way to fund new infrastructure and unlock land for growth. The NPPF states that CIL charges should be worked up and tested alongside the Local Plan (Para 175). We need to work with the council to identify where infrastructure improvement is needed to deliver sustainable development.</p> <p>The CIL Regulations specifically identify the levy as contributing to investment in flood defence and open space. CIL will help complement other funding sources and fill gaps that remain as more funding for flood risk infrastructure will be expected to be provided locally as the traditional form of Grant in Aid is being reduced. This could be infrastructure schemes to mitigate the impacts of surface water runoff, reduce flood risk, river restoration projects, or projects to deliver river basin management plan objectives, where they can be clearly linked to open space or flood defence benefits or other flood risk management infrastructure. For more information please visit: Surface water and groundwater flooding – on the Defra website Improving surface water drainage – on the Defra website</p>	<p>This is considered applicable to the Strategy, rather than the SEA.</p>

Table 3 - English Heritage Comments

SEA Scoping Report Consultation Response	English Heritage
Contact Name	Graham Saunders
Date Received	04 December 2012
Comment	Mouchel Response
Baseline Information – Cultural Heritage (pg38 -41)	
The baseline information needs to take account of the significance of all heritage assets and their settings (this includes non-designated assets). This includes heritage assets that may not fall within the boundary of Southwark but would have an influence on how developments managed in the Borough. For example the Outstanding Universal Value, significance and setting of the Tower of London World Heritage Site, albeit sited north of the Borough, still has an influence on the character of Southwark. As such the SEA should consider its heritage values as part of the assessment process. This approach should apply to any other relevant heritage assets.	Noted. The Tower of London World Heritage Site has been added to the baseline information. Section 5.9.5 refers to the importance of taking into account undesignated heritage assets and unknown archaeology.
It is also important that the baseline information highlights the condition of the historic environment including its heritage assets. For example the English Heritage Register of Heritage At Risk notes that there are 31 buildings, 1 place of worship, 2 scheduled monuments, 1 registered park and garden, and 1 conservation area, all at risk. This Register does not include any comment on other elements of the historic environment that may be at risk, such as locally listed buildings.	Noted. Section 5.9.2 has been added detailing the Heritage at Risk programme and the number and type of assets that feature on the list within Southwark.
Under Townscape/Landscape, recognition should be given to local views as identified by the Council through its various Development Plan Documents and other sources of information (such as Conservation Area Appraisals).	Noted. Under Section 5.10.3 Strategic Views – the importance of local views and their consideration in the LFRMS has been documented
SEA Objectives – Cultural Heritage	
It is important that the need to protect and enhance the significance of all heritage assets including their settings is identified part of the SEA objective for Cultural Heritage.	Noted. The objective has been reworded so that it is clear that the objective considers protecting and enhancing setting as well as heritage assets.

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It should be noted that under Potential Indicator, only World Heritage Sites benefit from buffer zones. In the case of the Tower of London one has not been official inscribed by UNESCO. However the Tower of London does benefit from a Local Setting Study that helps inform the setting of the Site. In the case of other heritage assets the approach should be to consider the setting of heritage assets and how flood related applications relate to them.	Noted. The buffer zone indicator has been removed. A suggested indicator has been added which would monitor number of flood related schemes where contributions are made to the enhancement of heritage assets or their setting
The indicator relating to the damage of heritage assets should be amended so that it measures whether flood related applications avoid causing harm to, and where possible enhance the significance of heritage assets and their settings.	Noted. The SEA Objective 11 potential indicator has been amended. It now includes a measure of flood risk related schemes that cause harm or make enhancements to the significance of heritage assets and their setting.
Policies, Plans and Programmes	
There area number of additional Policies, Plans and Programmes that should be included. These are listed below: <ul style="list-style-type: none"> • Planning (Listed Buildings and Conservation Areas) Act 1990 • PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide – March 2010 (it should be noted that this is still valid and not replaced by the introduction of the NPPF) • English Heritage’s Guidance on the <i>Environmental Assessment, Sustainability Appraisal and the Historic Environment</i> (2010). This document should be carefully reviewed as part of developing the SEA for the Flood Risk management Strategy. 	Noted. The Planning Act (1990) and PPS5 have been reviewed and added to the updated PPPs table in Appendix 2. English Heritage’s guidance has been reviewed and used to develop the methodology for the SEA assessment, detailed in the SEA Report section 3.1.