Comments from third parties on For a Rainy Day

From the **Environment Agency** (London section)

Thanks for your email and the chance to offer further comment on the 'For a Rainy Day' report, which we broadly support. We will continue to work with the Mayor and GLA group in implementing its recommendations. We support the reports findings and recommendations but I have outlined a few points for your further consideration below.

Recommendation 1

The Environment Agency supports the recommendations to the Mayor that the information gathered during the Drain London Project be made public. However, we would emphasise that the role of publishing this information is the responsibility of the individual London boroughs. Environment Agency officers seconded into London Councils have been working on supporting the London boroughs on this issue, with input from the GLA and the Drain London Board, and have circulated briefings to both borough officers and members. Whilst 'Finding 1' refers to the importance of flood risk awareness and emergency planning when responding to floods, this is not reflected in the recommendations in respect of the need for the public and businesses to sign up for flood warning and for Local Authorities to have adequate emergency plans in place.

Recommendation 6

Funding - since the publication of this report Defra has announced its new approach to funding flood and coastal risk management. 'Flood & Coastal Resilience Partnership Funding' was announced in May 2011 and applies to the allocation of capital Flood Defence Grant-in-Aid (FDGiA) to flood and coastal erosion risk management projects (including surface water projects). This is an outcome focussed partnership approach to funding which will enable a greater spread of projects to be funded by FDGiA, with gaps in funding being made up from contributions from beneficiaries.

On page 26 of the report it talks about Drain London and states:

"The project will enable a regional submission to be made for government funding to manage surface water flood risks in London."

Submission to Government funding for surface water flood risk projects will not be made on a regional basis. Individual boroughs or boroughs in partnership will apply for FDGiA and levy funds separately as schemes are developed from the evidence produced by the Drain London project.

Recommendation 7

The Environment Agency supports the recommendations to the Mayor to encourage partnership working between organisations and also third sector organisations and communities. The Greenstreet's project is an example of this.

Memorandum from the City of London Corporation

Submitted by the Office of the City Remembrancer

1. The City of London Corporation welcomes the "for a Rainy Day" report and its assessment of the responsibilities of the Mayor in relation to flood risk from surface water and rivers in London. The Committee's conclusions are generally in line with the City's expectations but the City would wish to see a clearer timetable on how the recommendations will be taken forward.

Recommendation 1

The Mayor should ensure that the Drain London flood risk data are available to the public, alongside information about what householders can do if they live in a flood risk area. Ways to make the data available could include the Water and/or Climate Change Adaptation Strategies, the London Datastore, the Environment Agency's existing publication of river and coastal flood risk maps and local borough publication

2. The GLA may wish to postpone the publication of the flood maps as the current Drain London model gives only a broad indication of the areas likely to be affected by surface water flood risk. This may cause undue alarm for those residents and businesses which have been grouped in the at risk section. The City is currently undertaking more detailed modelling of surface water flood risk, which all lead local flood authorities (LLFAs) are required to produce by June 2013. These maps are more likely to be of benefit and use to the public.

Recommendation 2

The Mayor should extend the applicability of the Green Roofs Fund to include other forms of sustainable drainage to support more exemplar projects to stimulate commercial interest.

Where possible, the Mayor should also ensure that the GLA Group estate exemplifies sustainable drainage in its own property works.

3. The City would welcome any initiatives which provide evidence and case studies showing flood risk alleviation projects. The City is collaborating on a green roof project at the Museum of London, funded through the Drain London Tier 3 allocations and would welcome other Sustainable Drainage Systems (SUDS) projects of this type to act as exemplars for future large scale implementation.

Recommendation 3

The Mayor, in his final Water and/or Climate Change Adaptation Strategies and their implementation, should raise awareness of the environmental impacts of garden paving and awareness of environmentally sustainable surface materials.

4. This recommendation should be extended to include paving associated with commercial developments including car-parking areas.

Recommendation 4

The Mayor should retain the target to restore 15km of rivers in the final version of his Climate Change Adaptation Strategy, and set out a plan for how this can be realised.

5. The City notes that it is unlikely that "hidden" rivers within the City's boundaries could be restored.

Recommendation 5

The Mayor should join the Assembly in calling for the forthcoming Water White Paper to address Thames Water's need to work directly with households to rectify misconnected drains.

6. The City of London welcomes this proposal as part of a Thames Water led multifaceted approach to sewer flooding and river water quality.

Recommendations 6 and 7

The Mayor should set out, in the final Water and/or Climate Change Adaptation Strategies, steps to identify and secure sources of short, medium and long-term funding from public, private and third sectors for the delivery of priority flood protection projects, including those in the Drain London, London Rivers Action Plan and London Green Grid programmes.

The Mayor should set out, in the final Water and/or Climate Change Adaptation Strategies, what steps he can take to support a mechanism to develop partnerships to take forward flood risk mitigation works.

7. The City Corporation would welcome support from the Mayor to identify and coordinate funding for flood protection projects, particularly those which involve partnerships across several LLFA areas within London.

Conclusion

8. The City of London Corporation believes that the Mayor has fulfilled an important role in managing the Drain London project and would endorse continued work with Lead Local Flood Authorities, to ensure that a coordinated approach to flood risk is maintained throughout London.

January 2012

From the National Flood Forum

Thank you for involving the National Flood Forum.

We are definitely interested in the Report and take great heart that London has grasped the issues so firmly. The Drain London project has broken new ground in how it has addressed the structural issues of flood risk management in a large and complex city environment.

The NFF is keen to help London develop the mechanisms to expand awareness and involvement of communities in the issues arising from the Report. In particular, we would be happy to help with the effective dissemination of public information to communities, the issues around funding of schemes and the development of community partnerships. These are all areas where the Flood Forum has experience and credibility available to few other groups.

I would be happy to discuss this in more detail with you.