

**WORCESTERSHIRE COUNTY COUNCIL**

**WORCESTERSHIRE LOCAL FLOOD RISK  
MANAGEMENT STRATEGY**

**STRATEGIC ENVIRONMENTAL ASSESSMENT:  
ADDENDUM REPORT**

**September 2016**

1. This addendum is part of a suite of Strategic Environment Assessment (SEA) documents produced to assess the environmental performance of the Worcestershire Local Flood Risk Management Strategy (LFRMS). It should be read alongside the *SEA Environmental Report* and *SEA Post-Adoption Statement*.
2. A full assessment of the draft LFRMS has been undertaken in the *Environmental Report*. The purpose of this *Addendum* is to assess the likely significant environmental effects – if any – that may arise as a result of changes made to the LFRMS since its publication in draft form.
3. The draft LFRMS and accompanying *Environmental Report* were subject to public consultation between 07 December 2015 and 29 February 2016. Responses from this consultation have been taken into account in producing the final, adopted version of the LFRMS.
4. The following summary sets out the likely significance of environmental effects arising from the substantive changes made to the LFRMS since it was published in draft form:

| <b>Change to LFRMS since draft version</b>  | <b>Likely significance of environmental effects</b>  |
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| The LFRMS now includes information on Rapid Response Catchments.  | This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms. |
| The Multi-Agency Flood Plan for Pershore is now referenced in the LFRMS, as a case study.   | This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms. |
| The LFRMS notes that flood risk management and highway drainage are now part of the same team, which will assist in integrating these two operations.   | This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms. |
| A greater emphasis on communication is now provided.  | This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms. |
| Text on the role of trees has been clarified, and the Woodland Trust publications <i>Trees in our towns - The role of trees and woodland in managing urban water quality and quantity</i> and <i>Planting trees to protect water: The role of trees and woods on farms in managing water quality and quantity</i> are now referenced. | This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms. |

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| <p>LFRMS amended to clarify that Worcestershire requires additional allowances to reflect urban creep (the incremental conversion of permeable surfaces to impermeable).</p>  | <p>This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p> |
| <p>LFRMS now recognises the complexities of upstream catchment management, including that schemes will require consideration of, inter alia, the need to actively and fully consult, engage and seek agreement with land managers and farmers. The important role of landowners, funding and partnerships is also recognised.</p> | <p>This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p> |
| <p>The positive contribution to the environment that can be made by farmers and land owners, contributing positively to flood risk management and environmental quality, is now recognised more fully.</p>  | <p>This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p> |
| <p>The importance of understanding agriculture is now included.</p>   | <p>This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p> |
| <p>A concise executive summary is now included, along with a short summary section at the beginning of each chapter, setting out the key messages.</p>  | <p>This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p> |
| <p>Wording had now been amended to avoid inconsistencies over the term 'main river' to avoid confusion.</p>   | <p>This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p> |
| <p>The LFRMS now states that its actions will need to integrate closely with catchment-wide strategies led by the Environment Agency.</p>   | <p>This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p> |

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| <p>The fact that the LFRMS applies to all flood risk mitigation, large or small, is now stated.</p>   | <p>This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p>   |
| <p>The LFRMS now states that, subject to designation, flood risk assets will be included on an Asset Register available for the public to view.</p>   | <p>This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p>   |
| <p>Objective 2.1 has been amended from "Ensure that FRM is fully taken into account by those planning new infrastructure and developments" to "Ensure that FRM is fully integrated into the design and planning of new infrastructure and developments at the earliest possible stage".</p>   | <p>The revised wording responds to an SEA recommendation and now makes clear that flood risk management should be taken into account at the earliest possible stage, to help ensure it is integrated into designs from the outset. This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p>   |
| <p>Objective 2.4 has been amended from "Work with landowners, NGOs and other public bodies to reduce surface water run-off" to "Work with landowners, NGOs and other public bodies to reduce surface water run-off and to prioritise a green infrastructure approach".</p>  | <p>The revised wording responds to an SEA recommendation. The specific reference to a green infrastructure approach should help to encourage the consideration of how flood risk management can not only address flood risk, but also achieve multi-functional benefits for people and for the natural and historic environment. This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p> |
| <p>Objective 4.2 has been amended from "Work with Local Planning Authorities to ensure surface water flooding is taken account in Local Plans and supporting evidence" to "Work with Local Planning Authorities and local communities to ensure surface water flooding is taken into account in Local Plans, Neighbourhood Plans, and supporting evidence".</p> | <p>The revised wording responds to an SEA recommendation to better reflect the need to engage with local communities. This is a valuable improvement, but is not considered likely to have significant environmental effects in SEA terms.</p>  |

5. The changes made to the LFRMS are considered to strengthen the document by improving cross-cutting links; providing a greater understanding of the nature of

flood risk and how various sectors can help to mitigate its effects; and improving clarity on the LLFA's responsibilities and ways of working.

6. All of the changes are considered to be either neutral or positive in their effect on the SEA objectives. None of the changes – either alone or in combination – are sufficient to have led to any revisions to the SEA ratings provided in the Environmental Report.
7. The difficulties encountered at Environmental Report stage – namely a lack of policy direction, lack of detail, and lack of alternatives – remain unchanged. As stated in the Environmental Report, the SEA seeks to identify *significant* effects, but many of the impacts will not be known until site-specific proposals are developed and implemented, and it cannot provide a full, site-level consideration of likely impacts; there is a valuable role for more detailed assessment regimes (such as Environmental Impact Assessment) to ensure development is truly sustainable.