Organisation	Response
Historic England	The Strategy identifies measures to manage local flooding, the risk of which is generally assessed to be low. The report notes the role of infrastructure such as the Thames Tideway Tunnel and Thames barrier in continuing to protect Westminster from serious flooding episodes. Where local measures are needed, we trust that these will be sensitively designed to ensure that they conserve the significance of heritage assets, in line with national policy for sustainable development. In this respect, for clarity, we suggest that Objective 2 specifically defines the environment as the 'natural, built and historic environment', thereby ensuring consideration of heritage assets is fully integrated into the objective.
RBKC	Thank you for inviting RBKC to Westminster's LFRMS consultation. We found the document very thorough and interesting, although in some cases it could benefit from shortening sentences to make it more legible. A list of abbreviations will be useful too. We have the following comments to make: In the Executive Summary there could be reference to how the Strategy will be monitored. In the internal LLFA roles (table 3.1, page 9) you may want to include customer services or the services who receive the residents' and members of the public phone calls to report flooding. Map 1.1: please include the names of the Local Authorities and the river in the map to refer to paragraph 1.2 Page 11, paragraph 3.1.4 (3rd bullet point): the role of the EA is more a supporting role rather than a reviewing role. It is not clear what this review will entail. 4.3.4 Sewer flooding. The Thames Tideway Tunnel will not connect all of the Combined Sewer Overflows along the river so the last sentence in this paragraph may need to be reviewed as overflows will continue albeit to a lesser degree. This is also relevant for paragraph 4.3.5 (second section). 4.4 The final sentence refers to how the potential increase of the Thames Barrier closures due to climate change may lead to a slight decrease of flood risk in central London. However, if the barrier is needed due to tidal events it is not clear how that will affect the

WCC (KH)	A few minor suggested changes to the text. I don't have any substantive comments on the actual content. · Page 9 Typo "As well as these new roles, the council has other longstanding responsibilities which play and important role in flood risk management." · Page 10 – GPH is incorrectly referred to as Growth Property and Housing (the P is for planning) · Para 3.2.5 (page 13) – This paragraph should also include Westminster in the list of organisations who are a part of the Central London North Flood Risk Partnership if that is the case. · Page 38 – The London Plan – technically the London Plan isn't adopted in the same way we adopt them – I think the correct term is to say the London Plan was published on so and so date. · Page 41 – The sub-title for the City Plan section should have the date 2016 as that is the most recently adopted version of the Plan. Some suggested re-wording of this section: This is the overall key planning policy document for determining planning applications in Westminster. It and is currently under revision and will be published for public
Local Resident - J	p5 It is stated that "The Flood and Water Management Act (2010) gives the council a number of statutory duties". What exactly are these duties? It would be helpful for these statutory duties to be listed in full. p10 Under 3.1.2 Thames Water, there appears to be no information or data supplied by Thames Water that residents in Westminster can readily access. An explanation in the consultation document of how this would be achieved and how frequently, would be both helpful and transparent. p11 Under 3.1.4 The Environment Agency, it should be clear that the EA does not deal with local drainage issues. p15 It is stated in table 4.1 that the number of sewer flooding incidents recorded for W2 is recorded as 42 incidents in the last 20 years. This is at odds with previous data supplied by Thames Water in June 2010, which indicates the recorded incidents of sewer flooding as between 51 and 100 cases (see Westminster PFRA Map 4.1a Summary Map of Past Floods - Recorded Incidents of Sewer Flooding (Thames Water DG5 Data). Therefore the data provided in table 4.1 is misleading and the
Thames Water	no comments but revised table provided of sewer water flooding.

Natural England	Based on the plans submitted, Natural England considers that the proposed plans will not have significant adverse impacts on currently existing designated sites. **Thames recommended Marine Conservation Zone** Natural England would like to bring to the attention of the Council plans for the designation of a Marine Conservation Zone in the River Thames. The Thames Estuary was a site recommended as a Marine Conservation Zone (MCZ) during the regional seas projects. This has now been amended and has been split into two separate recommended sites; the first (Upper Thames) stretches from Richmond Bridge to Battersea Bridge and the second (Swanscombe) stretches from The Queen Elizabeth II Bridge to Columbia Wharf/Grays. The Upper Thames Estuary rMCZ is an important area for smelt (Osmerus eperlanus). The boundary of the lower site, Swanscombe rMCZ, has been determined to fit more closely around records of the tentacled lagoon-worm (Alkmaria romijni) for which there is currently considered to be a gap in the ecological network. Other broad-scale habitats that were initially considered when the whole Thames was an rMCZ are included within the recommended Swanscombe site. The Thames Estuary rMCZ was last consulted on in 2012/13 (further information can be found here) and this documents the features that were considered at that time. The habitats which we currently have some confidence of presence and extent within the Swanscombe site are; Intertidal sand and muddy sand; Intertidal mixed sediments and Subtidal sand. NB the broad-scale habitat of intertidal mud is a supporting habitat of the tentacled-lagoon worm. This information is in draft status only and forms part of our scientific advice on the sites that are under consideration for Tranche 3. Defra and the minister will make final decisions regarding which sites and which features will go forward to a public consultation. These sites are not

Environment Agency (incl	3.1.4 EA responsibilities: The Environment Agency has a strategic role in flood risk management for England with responsibilities to: · Taking a strategic overview of the management of all sources of flooding and coastal erosion · Publish a National Flood Risk Management Strategy which provides a clear national framework for all forms of flood risk management; · Managing regional flood and coastal committees (RFCC) and support and advise around decisions made; · Review and support LLFAs; Providing data and information and tools to inform government policy and support local delivery of this; and, · Reporting and monitoring flood and coastal erosions risk management. Operationally the Environment Agency focuses on flooding from main rivers and the sea, which includes the Tidal River Thames in Westminster. 3.2.1 Residents and businesses Signposting by including links the for bullet points in this section, or link to where this is made available to the public i.e. Westminster webpage. 4.4 Future changes to local flood risk through climate change: Refer to the Thames Estuary 2100 plan (TE2100) and outlook for tidal Thames in future and objectives for RMAs and how Westminster is incorporating this into planning (maybe more info in the SFRA)? 5.1 Objectives for LFRMS (specifically Obj 4 and 5): A reference to whether the objectives for the LFRMS incorporate or have taken into consideration the TE2100 objectives as well as any other relevant policy and guidance. Action Plan Objective 1C: Review asset information collected for the River Thames tidal flood wall and how this is included in the LLFA asset register: FOR INFO - The EA holds records and performs regular checks
Canals and River Trust	The Canal and River Trust own the canals in Westminster. The Trust does not have any specific statutory responsibilities in relation to flooding and, therefore, its responsibilities are those of an owner and operator of its canals and other waterways.

WCC response to comments and actions undertaken.
The Council is particularly conscious of the need to protect heritage assets and this also comes through very strongly in the Council's current revision of the City Plan. The City Plan revision is supported by a Strategic Flood Risk Assessment which will be out to consultation later in November 2017 and also specifically supports this objective. We are happy to amend the objective wording to ensure a consistent approach.
We will include a reference to the monitoring process in the ES. We agree that it is a good idea to ensure customer services are clear on what to do with reports of flooding and what advice to give. I have put the names of our neighbouring borough's in Map 1.1. As noted, para 2.1 makes reference to the boundary neighboring authorities and the river. For 3.1.4. The EA both supports us but also we feel that they review and ensure that we do provide regular updates to both the strategy and the more general reporting functions we complete and send back to them. Where they are not happy with progress they do tell us - hence the statement of review. Thank you for the suggested clarifications on Thames Tideway and we have amended accordingly. Action plan: we will monitor the action plan through the annual progress report, and have incorporated the majority of your other helpful clarifications/suggestions, thank you! have already been done in July 2017. Should the deadline be in the next 6 years? Objective 1E: what is a 'PRFA term'. - this is the preliminary flood risk assessment.

Thank you for your comments and suggested changes to aid clarity.
Hyperlink to the current legislation webpage included where any modifications would also be listed in future. Unfortunately we are only able to access the data that Thames Water (as a commercial organisation) seeks to make available and we have no powers to influence their policy on data sharing under this strategy. I have made it clear that the EA does not deal with local drainage issues. Yes - we do go into more detail in the SFRA regarding the impacts of climate change on flood risk. This gives full reference to the TE2100 studies. I think our statutory duties are filled out in full. There is an updated table listing the sewer flooding incidences now in the final report, and it is made clear that this supersedes any previous data/results and we are confident that Thames Water have provided their most up to date figures. This is less relevant to the LFRMS as it does not need to deal with flooding from the River Thames as this is not local flood risk. We could refer to the SFRA for further details.
Most up to date figures given.

Noted; and shared internally. The revised city plan has more details on SUDS moving forward in the City Plan and this will be best dealt with as a consideration there.

3.1.4. clarification made in final report. we deal with future climate change issues moreso in the SFRA and a reference has been put in to say so. We have noted the asset information information, thank you. Remaining issues - these matters were also discussed in our face to face meeting in November 17, as was proactive community engagement.
We have clarified the responsibility as suggested in the final report and noted that you intend to support our flooding activity where possible.