



HILLINGDON
LONDON

Local Flood Risk Management Strategy

Consultation Review

May 2024

Section	Comment	LLFA Response	Change made? If not, please detail why.
1.1	Residents requested greater clarity around the purpose of the strategy	The first 2 paragraphs of Section 1.1 could be replaced a highlighted sentence or two (could be bold or in a box, etc) summarising the purpose.	Text Amended to better clarify purpose
1.2	'Working with Others' should be 'Working With Other Stakeholders	Section 3 title has been changed from "Working with Others" to "Working with Statutory Partners" and a new Section has been added to reflect the work with communities.	Text amended
1.4	Hillingdon's 'climate change targets' should be 'Council's climate change targets' "	Change "Hillingdon's" to "Council's" in Section 1.4	Text amended
2.1	different bodies' should be 'different authorities'	Change "bodies" to "authorities" in Section 2.	Text amended
2.2	Clarify section 2.2. regarding receding flows	Section 2.2 has been reworded to provide clarification	Text amended
3.6	Resident would like to know more about the maintenance schedules of gullies	The maintenance schedule of assets goes beyond just flood risk management. The gully clearance programme is weather dependent and therefore any commitment is subject to change. Information on how many times assets are 'cleaned' is being considered further and this will emerge as part of the Action Plan work on what information can be made available.	Further work to emerge from action plan to reflect this request

3.7	RAF Northolt lies within Hillingdon, making the Ministry of Defence a key landowner with thousands of square metres of impermeable surfacing.	RAF Northolt has been added to the key areas with the Ministry of Defence acknowledged as an important landowner.	Text Amended
4	No mention is made south west of the Borough encompassing Yiewsley, West Drayton, Harmondsworth and Sipson.	Reference has been made to work in West Drayton in the amended text but further work will emerge regarding priority areas. The Fish Passage project in West Drayton is being pursued and officers are already keen to identify projects in the south west of the borough.	To emerge from Action Plan work as priority areas are developed further
4.1	Provide more details on how Hillingdon are monitoring flood risk to make decisions on future projects.	Action A5 ensures that the Council keeps flood risk data up to date. The Environment Agency mapping on fluvial flood risk also reflects flood events as does the Council's own strategic flood risk assessment.	No changes. Observation noted.
4.3	Responses observed that Court Park, Elephant Park and Bessingby Parks flood alleviation schemes were not accompanied by consultation, have not been maintained and queries about their rationale were raised.	Engagement was undertaken on all these projects and positive feedback has been received about the efficacy of both Elephant Park and Bessingby Park. Concerns about Court Park are being investigated further. Notwithstanding the above, strengthening engagement on projects has been identified through lessons learned and this will resolve matters relating to rationale. The Council will not undertake work whether it is not necessary. In some instances, the flood alleviation schemes protect residents that are downstream and away from the physical works.	Lessons learned for future project management are being implemented.

4.3	Involve recognition of the excellent work done by local residents. Give them more of an involvement in flood prevention, especially further work in Park Wood	Case studies have been added to the Strategy to reflect the role of volunteers and where action has been resident led. Information on projects will be presented online with clearer acknowledgement of the groups involved.	Review and update
6.1	There is nothing to explain clearly how every homeowner is advised of actions that they should take nor when authorities explain to residents how they may assist when flooding occurs.	There is information on this topic in Section 7.1 (previously 6.1) and 7.2 and amendments have been made to strengthen the text. This section has been decoupled from the wider communities' section and further Actions have been added to the Action Plan.	Text reviewed and updated. Further information to emerge from Action Plan implementation
6.1	It should be made clearer to residents that the use of impermeable products on driveways is not acceptable and where it has been used, installation of additional drainage run off trenches is to be encouraged. Would be good to provide property owners clearer information about permeable materials for driveways and the benefits of them.	There is information on this topic in Section 7.2 and amendments have been made to strengthen the text. This section has been decoupled from the wider communities' section and further Actions have been added to the Action Plan.	Review text and add to website presentation material
6.1	Section 6.1 could be simplified	Section 7.1 (previously 6.1) has been amended to simplify the text. Further information will be forthcoming through the Action Plan Actions	Text amended

6.2	Due to the number of parties involved in managing flood risk (Council, TfL, Thames Water, etc.) it is not completely clear exactly who to report issues to (e.g. which highways are under Council and which under TfL?)	The text in section 7 (previously 6) has been updated to reflect who to report information to. An action plan requirement ensures the Council will provide further information and use the website to present the information in a better way.	Text amended
6.2	In instances where the source of flooding or rising groundwater under or over the public highway or footway is unclear it does not clearly state who should be the primary initial contact.	Section 7 (previously 6) has been updated to ensure that Hillingdon Council should be the primary contact if an enquirer is unsure on who to contact.	Text amended
6.2	Clearer flood contacts and an emergency flood contact should be provided.	Section 7 contains the relevant information with clarification on who to contact. Further information will be made available as the Action Plan requirements are fulfilled.	Comment noted. No amendments made.
6.3	Additional advice and resources on making a property flood action plan is requested.	Section 7 and the Action Plan has been strengthened to reflect this (and other) comments. Further information will be made available online through the Action Plan requirements.	Text amended and new Actions added
6.4	More clarity/information on how local residents/communities can support the voluntary works as part of this strategy.	Section 4 (decoupled from Section 6) now contains more information on volunteering. Opportunities will be promoted through the Action Plan implementation.	Text amended
1.3, 1.5	Who will undertake an annual review?	Section 1 has been amended to reflect the need for an Annual Status Report and by who.	Text amended
2.1.4	The generic image of flooding in	Photo of Park Avenue manhole surcharging (LLFA to send to Metis) has	Image amended

	Oxfordshire should be locally specific.	replaced the generic image of surface water flooding	
3.2.2	Better coordination with neighbouring boroughs is required.	Section 3 has been amended to reflect the partnership work which includes the North West London Partnership group. The Action Plan has also been strengthened to reflect the partnership working.	Text amended
Acronyms	Flood Action Groups (FLAGs) not included in the acronyms list.	FLAGs have been added to the Acronyms and Abbreviations.	Text amended
Whole document	Residents found the documents to be very lengthy and asked if they could be simplified and shortened.	The strategy needs to be lengthy to reflect the amount of information that is necessary to divulge. The document was also produced in this format for ease of consultation. It will be broken down into component parts on the website to allow for an easier interface. A full version will still be available for those that want it.	Comment noted
Whole document	Residents would like to see better/increased maintenance of existing flood alleviation measures.	Further work will emerge from the Action Plan with regards to flood assets and what information on maintenance can be provided.	Noted. Further work to emerge from Action Plan
Whole document	Residents think there should be more focus on how climate change will increase flood risk and how the council are adapting to this.	There are many references to climate change in the Strategy. Importantly, climate change is embedded within the mapping which will be made available online. There is also a commitment for further work on flood risk adaptation and resilience in the Strategic Climate Action Plan.	Noted - this comes through mapping and monitoring of incidents
Whole document	Ensure 'Council', 'Hillingdon' and 'borough' are correctly used noting that Hillingdon is a defined location within the borough.	References have been clarified.	Text amended

Themes	Working with 'statutory authorities' needs to be distinct from 'working with other stakeholders'	The Strategy has been amended to differentiate between those with statutory duties and other groups and individuals. The specific language used is different to that proposed but changes have been made.	Text amended
1.2	Engagement needs to be defined	<p>The specific work on engagement will be defined through the implementation of the Action Plan and will be specific to the relevant organisation or groups.</p> <p>The Action Plan has been amended to include the need for an engagement plan</p>	Noted. To be developed further through implementation of the Action Plan
1.2	Opportunities needs to be defined	'Opportunities and projects' are generic terms to identify how better flood risk management can be achieved. Not all measures will result in specific Council led projects. In that regard, opportunities can relate to many other measures, particularly those delivered by others within the borough.	Noted
2	Replace 'intense rainfall' with 'cloudbursts'	The original text is considered sufficient to illustrate the point of increased rainfall which is generic and therefore includes 'cloudbursts'.	Noted
2	Presentation of mapping needs to be improved	There is a significant amount of mapping available with regards to flood risk and therefore would not be feasible to include in the document. The links provided were interactive to enable users to select the relevant information. Once adopted, the Strategy will be accompanied by mapping on the website.	Noted
2	Artificial waterways and sources to be replaced by alternative explanation	This section has been amended but 'artificial' has been retained to maintain the important difference with natural watercourses and waterbodies. Artificial sources are intended to describe features that	Text amended

		were purpose built. Although there may be a degree of natural water collection, the actual source is a result of human intervention.	
2	Clarify types of sewers.	Text has been amended to differentiate between foul and surface water sewers	Text amended
Whole Document	Clarification on how objectives will be measured and monitored	The Annual Status Report will provide a commentary on the progress against the relevant objectives. The implementation of the Action Plan will be developed further with clarity around timescales. The Strategy provides the overview with the detailed work to be developed further.	Noted
Action D5	SUDS should always be used in new development	Not all developments as defined by the Town and Country Planning Act require physical works. In some cases, those that do may not physically be able to, or need, to use SuDS. Each development will be considered on a case by case basis with preference for the use of SuDS in all instances where drainage arrangements are a material planning consideration.	Noted