

 <b>Brent</b>	<b>Cabinet</b> 7 April 2025
	<b>Report from the Corporate Director, Neighbourhoods and Regeneration</b>
	<b>Lead Member- Cabinet Member for Public Realm and Enforcement (Councillor Krupa Sheth)</b>
<b>Local Flood Risk Management Strategy</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>List of Appendices:</b>	Three Appendix A: The Local Flood Risk management Strategy Appendix B: Action Plan Appendix C: Consultation Questions
<b>Background Papers:</b>	None
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## 1.0 Executive Summary

- 1.1 The Flood Risk Regulations 2009 introduced duties onto Local Lead Flood Authorities (LLFAs) including the requirement to prepare a Flood Risk Management Strategy (Strategy).
- 1.2 The Strategy details actions the Council and other key stakeholders are taking to manage flood risk in Brent. It has the following aims:

- Improving the understanding of flooding risks In Brent.
- Reducing the risk of flooding for people and businesses in Brent.
- Providing clear information on the roles and responsibilities of everyone involved in flood risk management in Brent.
- Ensuring that emergency plans and responses to flood incidents in Brent are effective.
- To take a sustainable and holistic approach to flood management, seeking to deliver wider environmental and social benefits

1.3 The original Strategy was adopted in 2015. A revised, updated Strategy has been drafted and a consultation has taken place with key stakeholders, including local residents and businesses, neighbouring boroughs, Thames Water and the Environment Agency. The Strategy has been amended to take on board the feedback provided during the consultation.

## **2.0 Recommendation(s)**

2.1 That the Cabinet approves the Flood Risk Strategy for Brent as described in Section 3 and appended to this report.

## **3.0 Detail**

### **3.1 Cabinet Member Foreword**

3.1.1 Brent avoided the severe floods that affected other parts of the country in 2007 and 2012 but did experience some flooding in 2007 and 2010, mainly in open spaces and gardens. With climate change increasing extreme weather events, flooding in Brent could become more frequent, and its impact could be significant due to the borough's high population density.

3.1.2 Flooding causes major social and economic issues, and reducing the long-term risk is crucial for everyone, requiring collaboration between public agencies, businesses, and households. This Strategy outlines existing efforts to manage flood risks and the steps needed to improve them, focusing on local flood risks like groundwater, surface water, and ordinary watercourses. While preventing all flooding is impossible, the Strategy aims to prioritize actions based on evidence and resources. The goal is to be as prepared as possible when flooding occurs

3.1.3 The Strategy can directly contribute to Brent Council's Borough Plan by aligning with its key objectives, particularly those focused on improving community resilience, protecting the environment, and promoting sustainable development.

### **1. Objective: Strengthening Resilience and Reducing Vulnerability**

The Strategy focuses on reducing the long-term risk of flooding, and enhancing the borough's resilience to extreme weather events. By managing local flood risks effectively, it helps protect communities, especially those in flood-prone

areas, reducing vulnerability to environmental hazards and contributing to the Borough Plan's aim of creating safer, more resilient communities.

## **2. Objective: Sustainable Growth and Infrastructure**

The Strategy identifies flood risks and incorporating flood prevention measures into planning. This ensures that infrastructure and housing developments are resilient to flooding, aligning with the Borough Plan goal of sustainable growth while minimizing flood-related disruption.

## **3. Objective: Protecting and Enhancing the Environment**

The Strategy addresses environmental risks from flooding, particularly to natural habitats and watercourses. By managing local flood risks it ensures that environmental assets are protected, contributing to the Borough Plan's objective of preserving and enhancing Brent's natural environment.

## **4. Objective: Promoting Well-being and Quality of Life**

The Strategy aims to reduce economic and social impacts by mitigating flood risks and ensuring the borough is better prepared when flooding occurs. This supports the objective of improving quality of life and well-being for residents by minimizing the stress and displacement caused by flooding events.

## **5. Objective: Partnership Working and Community Engagement**

The Strategy emphasizes collaboration between public agencies, businesses, and households, ensuring a joint approach to flood risk management. This promotes partnership working, a key aspect of the Borough Plan, and encourages community involvement, fostering a shared responsibility for flood resilience across Brent.

### **3.2 Background**

3.2.1 Following extensive flooding in 2007 the Government gave powers and responsibilities to local authorities enabling them to manage flood risk more effectively. The Flood Risk Regulations 2009 and the Flood and Water Management Act 2010, have increased the statutory responsibilities of unitary authorities such Brent Council, which has a role as the Lead Local Flood Authority for the borough.

3.2.2 The Flood Risk Regulations 2009 requires LLFAs to prepare preliminary assessment reports, to identify Flood Risk Areas and to prepare a Flood Risk Strategy. The Flood and Water Management Act 2010 aims to provide better, more comprehensive management of flood risk for people, homes and businesses. It identifies "risk management authorities"; bodies with an interest in flood risk management. The Act outlines the responsibility of the lead local flood authority to "develop, maintain, apply and monitor" a strategy for local flood risk management.

- 3.2.3 This updated Strategy details actions the Council and other key stakeholders are taking to manage flood risk in Brent. The Strategy has five objectives:

#### **Improving the Understanding of Flooding Risks in Brent**

- 3.2.4 The Strategy sets out the flood risk by discussing the flooding history, the geography, likely sources of floods and the overall risk of flooding for Brent.
- 3.2.5 From the historical incidence of flooding, Brent has a low to moderate flood risk. The key flood risk is from surface water flooding. This occurs when the volume and intensity of a rainfall event exceeds the capacity of the drainage system, the responsibility for which lies with Thames Water. Brent also has a small risk of groundwater flooding which occurs when the water table rises to ground level and inundates low lying areas, though more work may be required to understand this.
- 3.2.6 Getting a better understanding of flood risk will involve more studies, modelling the risk posed by surface water, from information gathered by investigations into flooding events. Gathering information is part of our Action Plan (section A1, A2 and A3). Reports of flooding incidents will trigger S19 investigations to be carried out, which will be evidence a case to put a project on the RFCC programme to apply for funding for an extensive flood alleviation study to be carried out in the borough. Such a study would include modelling of the surface water, data collection from the Environment Agency and Thames Water on flooding and identification of the main factors posing the flood risks, as well as solution options to carry out construction works to improve a particular area of high risk of flooding.

#### **Reducing the Risk of Flooding for People and Businesses in Brent**

- 3.2.7 The Strategy details what is already being done to manage the flood risk in Brent; including systems set up to investigate flooding incidents and the register of "Flood Risk Assets" - structures or physical features that influence flood risk. If a rainfall event is severe enough, maintenance alone will not stop flooding, however maintaining existing assets is important in alleviating the effects of flooding. The Strategy includes a summary of the actions that Brent Council and the risk management authorities in Brent will be undertaking to deliver the objectives of the Strategy.
- 3.2.8 Providing clear information on the roles and responsibilities of everyone involved in flood risk management in Brent
- 3.2.9 This Strategy has a coordinated approach to work in this important area, and will draw together the work of other risk management authorities within the borough, such as water companies and the Environment Agency.
- 3.2.10 Communicating with the public about flood risk is important. The key messages are:
- Flooding is rare in Brent but when it does occur the impact could be severe and it is important that everybody is prepared for it.

- It is important that we increase our knowledge of where there is a risk of flooding so that we can look to reduce that risk. Without this knowledge we cannot act.
- It is important to report flood incidents because it adds to our knowledge on areas at risk and frequency of incidents. This information informs how activities are prioritised.
- We can never be sure down to the level of individual properties where will be affected by flooding.
- The council has a programme of work to improve flood risk where practical affordable solutions can be found.

Publicly consulting on this strategy engages with residents about flood risk.

3.2.11 Ensuring that emergency plans and responses to flood incidents are effective. Flooding comes in a variety of forms with varying levels of seriousness ranging from ponding to damaging or dangerous flooding. The Strategy sets out the Council's responses.

3.2.12 To take a sustainable and holistic approach to flood management, seeking to deliver wider environmental and social benefits

3.2.13 Flood risk management is an environmental activity and the strategy needs to support both local and national plans for sustainable development. It does this by considering key national plans such as the Water Framework Directive and the Strategic Environment Assessment (SEA) directive, as well as local plans such as Brent's planning framework.

#### **4.0 Consultation**

4.1 As the LLFA, the Council consulted community stakeholders, internal council teams and Risk Management Authorities (RMAs) and partner organisations on our Strategy.

4.2 The Flood and Water Management Act (2010) stipulates that the LLFA consult RMAs that may be affected by the strategy and the public. The LLFA requested feedback from community stakeholders and RMAs as well as internally for consideration and amending the Strategy where appropriate.

4.3 The Strategy was put on the consultation portal and was signposted with links from various places on the Council website. Hardcopies of the strategy and associated documents, along with consultation questionnaire, were available at main Brent libraries. Additionally stakeholders were asked to comment, including the Environment Agency, Thames Water, TfL and adjacent boroughs. Members' attention was brought to the strategy via an all-Councillor email

4.4 The associated documents which accompanied the strategy as part of the consultation were the Habitats Regulations Assessment, Strategic Environmental Assessment and the Action Plan. The consultation ran from 18<sup>th</sup> November to 31<sup>st</sup> December 2025

4.5 The consultation questions in full are included in Appendix C

4.6 There were ten responses to the consultation. A summary of the comments and responses to those comments are below:

- **Strategic Objectives of the Local Flood Risk Management Strategy:** Most respondents agree with the objectives, though some raised concerns about execution, prioritization, and the clarity of the strategy. Issues highlighted included neglect of local rivers, conflicts with other priorities like development and cost minimization, and concerns about water quality.
- **Understanding of the Strategy:** Most find the strategy easy to understand, though some suggested improvements, such as reordering sections, introducing key terms earlier, and providing clearer reporting information.
- **Desire for More Information:** Some want more details on flood risk management, specifically drainage and local authorities' actions, such as improving sewer capacity and flood prevention collaborations with neighbouring boroughs.
- **Missing Elements in the Strategy:** Common concerns include the management of sewage systems, impact on watercourses, maintenance issues, and the need for better planning integration. Suggestions included more examples of Property Flood Resilience, clearer emergency communication, and addressing flood risks to basements.
- **Action Plan Disagreements:** While there was no widespread opposition, some suggested the action plan lacks urgency and requires more immediate action on local flood capacity, clearer maintenance and financing plans, and better coordination with other stakeholders like Thames Water.
- **Timescales in the Action Plan:** Most respondents agreed with the proposed timescales, though some felt action should be more immediate, especially to address the severity of flood risks and support local community initiatives.
- **Additional Actions in the Action Plan:** Few new actions were proposed, but some emphasized clearer commitments, specific solutions for past flooding incidents, and a rethinking of how to manage water to avoid future issues.
- **Environmental, Social, and Economic Factors:** Limited feedback was provided, with some suggesting the alignment of flood risk management with Brent's carbon and biodiversity goals. Concerns were raised about building pressures and the current approach to flood risk.

- **SEA Objectives:** Most respondents agreed with the objectives, though some requested more clarity and a stronger acknowledgment of current flood risks and conflicts between priorities like funding and development.
- **SEA Comments:** Most responses were non-committal, but one respondent suggested including volunteer groups in discussions and another felt the SEA did not sufficiently address the seriousness of the situation.
- **Additional Comments on the HRA:** A few respondents expressed concerns about the impact of flooding on local rivers, sewage contamination, and the lack of Habitat Regulations Assessments (HRAs) for new developments, particularly in Kenton.

4.7 In summary, while the overall response to the strategy is positive, there were some suggestions for improvement, particularly regarding urgent action, clarity, coordination, and more comprehensive consideration of environmental and maintenance issues. The feedback was taken on board in the documents as appropriate.

## **5.0 Stakeholder and ward member consultation and engagement**

5.1 This is detailed in Section 4.0

## **6.0 Financial Considerations**

6.1 Many of the functions and activities detailed in the strategy are already embedded in the day-to-day activities of the Council, and so the adoption of this Flood Risk Strategy will be contained within existing budgets.

6.2 The implementation of the Flood Risk Strategy may require some additional officer time. However, the resultant resource commitment is anticipated to be minimal and will be met from the service areas budget.

## **7.0 Legal Considerations**

7.1 The roles and responsibilities of Brent Council and our partners in relation to flood risk management are principally defined by two key pieces of legislation:

7.3 The Flood Risk Regulations 2009 introduced the following duties onto Local Lead Flood Authorities ;

- the duty to prepare preliminary assessment reports;
- the duty to identify Flood Risk Areas and,
- the duty to prepare a Flood Risk Strategy

7.4 Flood and Water Management Act 2010 aims to provide better, more comprehensive management of flood risk for people, homes and businesses. The Act identifies risk management authorities, which are bodies with an interest in flood risk management.

7.5 Brent Council takes on the role of Lead Local Flood Authority, and has the 'lead' role in managing local flood risk from surface water, groundwater and ordinary watercourses across Brent. The Act outlines the responsibility of the lead local flood authority to "develop, maintain, apply and monitor" a strategy for local flood risk management. The approval by Cabinet of this Strategy will evidence the fulfilment of that duty.

## **8.0 Equity, Diversity & Inclusion (EDI) Considerations**

8.1 Both Screening and a full Equalities Assessment took place for the Flood Strategy. The Screening identified that there could be beneficial effects from the Strategy on three protected characteristics. As the aim of the strategy is to reduce the risk (and therefore logically) the incidence of flooding, access to properties should be improved (through reduced flooding) which should benefit those groups who may have mobility issues (Age, Disability and Maternity & Pregnancy)

8.2 The full Equalities Assessment considered the borough Flood Risk Map and cross-referenced it against the geographical diversity across the Borough of the effected Protected Characteristic groups. It showed that there were higher proportions of the Age and Disability groups in areas of higher flood risk; therefore any mitigation of flood risk should disproportionately benefit those groups. There was no geographical information available for the Pregnancy and Maternity Group.

## **9.0 Climate Change and Environmental Considerations**

9.1 The strategy addresses environmental risks from flooding, particularly to natural habitats and watercourses. By managing local flood risks it ensures that environmental assets are protected, contributing to the Borough Plan's objective of preserving and enhancing Brent's natural environment

## **10.0 Human Resources/Property Considerations (if appropriate)**

N/A

## **11.0 Communication Considerations**

N/A

**Report sign off:**

**Alice Lester**

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