

**Local Flood Risk Management Strategy
for Hertfordshire**

**Strategic Environmental Assessment
Environmental Report -
Annex E: Working Note on Issues and Options**

Prepared June 2012



Produced by Place Services on behalf of Hertfordshire County Council

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1 INTRODUCTION

1.1 Background

In July 2011 Hertfordshire County Council commissioned Essex County Council's Strategic Environmental Assessment Team, now part of Place Services, to undertake a Strategic Environmental Assessment (SEA) on the proposed Local Flood Risk Management Strategy (hereafter referred to as LFRMS) for Hertfordshire. Place Services continues to act as consultants for this work; therefore the content of the SEA should not be interpreted or otherwise represented as the formal view of Essex County Council.

This document is Annex E to the Environmental Report of the draft LFRMS. It is the Working Note produced by Place Services for the Issues and Options consultation on the LFRMS. It presented the findings of the SEA on the issues for the Strategy and assesses the options/ alternatives proposed.

1.2 Working Note Introduction

This working note has been produced to provide Hertfordshire County Council with a working record of the Strategic Environmental Assessment process with regard to the Issues and Options stage of their Local Flood Risk Management Strategy.

This appraisal is not intended to be a detailed assessment of each policy issue and its associated options as would be provided by a full SA/SEA. Undertaking a full baseline-led SA/SEA was not considered to be a viable approach due to the high level strategic nature of the issues and options presented within the LFRMS document. Nonetheless, the appraisal provided here will still highlight those options which will have the strongest holistic impact on the notion of sustainability.

The sustainability of an issue and its associated options is dependant upon the factors encompassed by the sustainability appraisal objectives. An option could have some very positive aspects and some very negative aspects; therefore in order to evaluate the overall sustainability of an option these factors must be amalgamated. This process also enables comparisons to be made between options and makes any choices regarding which are chosen and which are rejected explicit.

For this assessment, each issue is reproduced along with its options, followed by their individual performance under the SA/SEA framework. A short commentary will accompany each issue, explaining why relevant assessments have been made and suggesting which of the options provides the most sustainable strategic approach.

Please note that the contents of this working note are still subject to final review and consultation responses, and should be treated as a working draft only at this stage.

1.3 Synopsis of Working Note

Some general points coming out of the appraisal are as follows:

- The absence of spatial or procedural detail in each grouping of options makes it impracticable in most cases to assess any specific impacts across different

elements of the SEA Framework. This is however considered acceptable as each grouping of options represent a range of high level strategic policy directions through which the plan makers can address their highlighted issues. It is assumed that details will follow once a policy direction has been finalised, and that this detail will again be subjected to SEA. It is however still possible to assess each option relative to the other options associated with any one issue, and from that assessment select the most sustainable option.

- Regarding Issue 2 and to a lesser extent Issue 3, the option that would realise the strongest performance against the SEA Framework is not considered to be the most practical option. This is because those options would be financially intensive, and there may come a point of diminishing return as investment is progressively increased. An evidence-based level of investment will need to be sought in these cases.
- Regarding Issue 8: Sustainability, Option 3: Improve (the environment) is considered to be the most attractive option but it is currently assessed as resulting in a great degree of uncertainty across all parts of the SEA Framework other than Objective 6 which is concerned with biodiversity amenity. It is considered that this uncertainty could be resolved primarily through stating that funding commitments made under this option would be proportional and would not result in funding gaps in other areas of flood mitigation. The uncertainty is also reduced when this Issue and Option are assessed in conjunction with other preferable options.

2 SA/SEA APPRAISAL OF LOCAL FLOOD RISK MANAGEMENT STRATEGY ISSUES AND OPTIONS

2.1 Issue 1: Level of Local Flood Risk

A national assessment of surface water flood risk has identified that there are potentially in the order of 50,000 properties in Hertfordshire at a risk of flooding to a depth of 30cm due to the effects of a storm with a 0.5% probability of occurring in any one year. Because of the impacts of climate change the level of flood risk is anticipated to rise even if all existing flood risk management assets are maintained and replaced to original specifications and all new development takes flood risk and climate change into account.

OPTIONS

1. **Do Nothing** – potentially more properties will flood and for those already at the risk of flooding they will potentially flood to a greater depth and/or more frequently.
2. **Maintain** – keep pace with climate change so that there is no net increase in flood risk; existing flood risk management infrastructure will need to be improved over time and all new development will need to take climate change into account.
3. **Improve** – take action to reduce the number of properties that would potentially flood and the potential impacts of that flooding.

TABLE 1: SA/SEA APPRAISAL MATRIX FOR ISSUE 1

Option	Obj 1	Obj 2	Obj 3	Obj 4	Obj 5	Obj 6	Obj 7	Obj 8	Obj 9
1. Do Nothing	-	-	-	-	0	-	-	-	-
2. Maintain	-	0	-	-	0	0	-	0	0
3. Improve	++	++	++	++	+	0	+	0	++

COMMENTARY

Option 3, to proactively reduce the number of properties at risk of flooding, and the potential impacts of flooding, performs most strongly against the SEA Framework. There are positive impacts associated with Option 3 against the need to minimise the risk of flooding on existing development and amenity (Obj 1), to maintain and enhance water resources and quality (Obj 2), to promote human health (Obj 3) and to ensure that the potential impact of flooding on existing and future infrastructure is minimised (Obj 4). A positive impact is also realised against the need to adapt development to the impact of climate change (Obj 9). Secondary positive impacts have been assessed against the need to ensure that new development is directed to areas with the lowest probability of flooding (Obj 5) as proactive flood mitigation will ensure that more of these areas are available. A further positive impact is assessed

against enhancing the character of the townscape. Whilst reducing the risk of flooding would appear to have strong connotations with the notion of enhancing townscape character, there is the possibility that necessary flood mitigation measures may detract from visual amenity and as such the positive impact could potentially be tempered. It will need to be ensured that where possible development relating to flood mitigation is in keeping with the existing townscape.

Option 1 performs particularly poorly against the SEA Framework. Whilst 'Do Nothing' may appear to ensure a maintenance of the status quo, flood risk in Hertfordshire will increase as the effects of climatic change increase over time. As such, 'Do Nothing' will exacerbate existing flood issues. Strongly negative impacts have been assessed against many of the objectives which performed positively under Option 3 as not only will outstanding issues not be addressed, the increase in flood risk will see deterioration in performance against these objectives. Less strong negative impacts have been assessed against protecting biodiversity (Obj 6) and protecting soil (Obj 8) as it is considered that this issue is not particularly relevant to these SEA objectives but a 'Do Nothing' approach will likely see a decrease in relative performance. Option 2, to 'Maintain' current performance, will require the implementation of additional flood mitigation measures in recognition of the increasing potential for flooding to occur. Performance against the Framework is however mixed. It is considered that there will be no impact relative to the current situation on a number of objectives as the intention is to preserve the status quo. Minor negative impacts have been assessed against those objectives which require promotion, enhancement or the minimisation of a theme as keeping pace, whilst not resulting in an overtly negative impact per se, will nonetheless fail to realise an improvement.

2.2 Issue 2: Understanding Flood Risk

The future flood risk from surface water can be estimated but the details of flooding mechanisms and potential impacts are not generally well understood. In addition the European Floods Directive requires assessments of impacts on human health and life, the environment, cultural heritage and economic activity.

OPTIONS

1. **Do Nothing** – analysis of local flood risk would not improve and there will be poor quality information on which to base decision making. There is also a risk that the authority will not be able to meet legal requirements.
2. **Pragmatic Analysis** – areas where flood risk is felt to be significant will be prioritised for investigation so that the potential impacts and mechanisms of flooding can be better understood. This will include the potential impacts of climate change. The results can then be used in local decision making and flood risk management activity. Analysis will need to meet any legal requirements.
3. **Detailed Analysis** – a comprehensive analysis is carried out for all potential future flooding. The risk that much of the derived information will not be applied and may become out of date as methods of predicting of future flood risk improves.

TABLE 2: SA/SEA APPRAISAL MATRIX FOR ISSUE 2

Option	Obj 1	Obj 2	Obj 3	Obj 4	Obj 5	Obj 6	Obj 7	Obj 8	Obj 9
1. Do Nothing	-	-	-	-	-	-	-	-	-
2. Pragmatic Analysis	++	++	++	++	++	++	++	++	++
3. Detailed Analysis	++	++	++	++	++	++	++	++	++

COMMENTARY

Negative impacts have been assessed across the SEA Framework for Option 1 which is the 'Do Nothing' approach. It is stated in the commentary that the details of flooding mechanisms are not generally understood and as such by not seeking to further develop an understanding of flood risk issues there will be no further increase in knowledge. The SEA objectives require the minimisation, promotion, maintenance and protection of a number of themes as addressed by the objectives, and it is assessed that a 'Do Nothing' approach in a field not fully understood does not accord with these ideals. Strongly negative impacts have not been assessed however as there is still existing localised strategies and information which could be utilised. In addition, and as highlighted by the commentary associated with this issue, Option 1 may also result in a contravention of the European Floods Directive and should therefore be rejected.

Option 2 (Pragmatic Analysis) and Option 3 (Detailed Analysis) both show strong positive impacts across the SEA Framework. Both these Options involve a further development of the understanding of flood risk and as such directly accord with the SEA Framework which seeks to ensure that the impact of flooding across the range of relevant receptors is minimised. Whilst it is noted that the detailed assessment as described under Option 3 may result in a higher level of understanding than what would be realised under Option 2, it is considered that Option 3 will be broadly impractical. Option 3 would be associated with a far higher cost, both fiscally and in the time it takes to carry out the analysis. There is recognition in the commentary that analytical understanding of flood mitigation is growing and as such work carried out now may quickly become out of date or be seen as inaccurate as methodologies are improved. Consequently Option 3 is not considered to be as preferable an approach as Option 2 which seeks to focus analysis on those areas ascertained as being most at risk of flooding. Whilst this does not eliminate the potential for future methodologies to be improved and findings subsequently needing to be revised, it will eliminate the requirement to carry out detailed studies in areas of low to negligible flood risk, providing both cost and time savings. Option 2 is therefore considered to be the most practical option as it is assessed that the relative benefit of pursuing Option 3 is not significantly high enough to merit the increase in outlay that would be required.

2.3 Issue 3: Collecting of Flooding Data

This links to the issue above but is a distinct area of activity. Information about flooding in Hertfordshire has not been collected or held in a consistent format. There are local exceptions but generally there are limited records of the frequency, extent and impact of surface water flooding events. Robust data helps to interpret and refine predictions of future flooding and also informs decision making such as the prioritisation of activity

OPTIONS

1. **Do Nothing** – understanding of local flood risk will not improve significantly and lack of data will hinder the development of statutory flood risk assessments that are required to comply with legislation.
2. **Minimum Effective** – co-ordinate activity of local partners to develop a standardised framework that can integrate with existing reporting and provide a centralised point for the collection / collation of relevant data.
3. **High Investment** – set up a centralised mechanism to carry out detailed investigations and recording of all local flooding incidents.

TABLE 3: SA/SEA APPRAISAL MATRIX FOR ISSUE 3

Option	Obj 1	Obj 2	Obj 3	Obj 4	Obj 5	Obj 6	Obj 7	Obj 8	Obj 9
1. Do nothing	-	-	-	-	-	-	-	-	-
2. Minimum Effective	+	+	+	+	+	+	+	+	+
3. High Investment	++	++	++	++	++	++	++	++	++

COMMENTARY

Assessing this Issue under SEA is considered to be problematic due to the absence of spatial and procedural detail, and this is particularly the case when assessing the relative merits of Option 2 (Minimum Effective) and Option 3 (High Investment). Option 1 can however be considered to be the least sustainable option. Whilst data upon which to base a policy direction does exist, the format and amount of information is considered to be inconsistent across the administrative area and a 'Do Nothing' approach will not address this. The plan makers have also suggested that this could hinder the development of statutory flood risk assessments. This will evidently have a negative impact across the range of SEA objectives and more significantly will be in contravention of existing legislation. As such it is not considered viable to pursue this option.

As stated above, it is difficult to accurately assess the difference between a 'Minimum Effective' and 'High Investment' approach without further detail surrounding the implications of each. By definition a 'High Investment' approach, if undertaken in accordance with a strong methodology, would realise greater positive benefits than an approach designed to yield minimum effectiveness. The important distinction to be

made however is the relative increases in benefit accrued as investment is increased. The most sustainable option would therefore likely be an evidence based hybrid approach between 'Minimum Effective' and 'High Investment', with the decided approach being one where any further investment above the chosen level is unlikely to reap significant returns relative to the increase in finance required.

2.4 Issue 4: Parameters

Thresholds need to be defined to frame any local flood risk management. The Lead Local Flood Authority has discretion on many aspects of service delivery e.g. when flooding should be investigated; what is "significant" when recording structures and features that have a significant effect on local flood risk; how flood risk management might be prioritised; and whether there should be ongoing local authority investment in a capital programme.

OPTIONS

1. **No Parameters** – issues dealt with on a case by case basis which leads to inefficient use of resources and confusing processes that are not transparent. Difficult to plan to access any external sources of funding and decisions are constantly challenged.
2. **Prudent Parameters** – relatively high thresholds for intervention are defined for first strategy with programmed review. This gives an opportunity for an informed appraisal in the light of experience and a degree of certainty for operational planning in the interim. Not all cases of flooding or potential flood risk will be prioritised for action.
3. **Ambitious Parameters** – attempt is made to define parameters which embrace all cases of flooding and potential flood risk. This has the risk of raising expectations which cannot be met and committing to an unsustainable programme which cannot be resourced.

TABLE 4: SA/SEA APPRAISAL MATRIX FOR ISSUE 4

Option	Obj 1	Obj 2	Obj 3	Obj 4	Obj 5	Obj 6	Obj 7	Obj 8	Obj 9
1. No Parameters	-	-	-	-	-	-	-	-	-
2. Prudent Parameters	++	++	++	++	++	++	++	++	++
3. Ambitious Parameters	-	-	-	-	-	-	-	-	-

COMMENTARY

Similar to other issues, it is difficult to produce a detailed SEA on the options as presented due to the absence of spatial information or project detail in what is intended to be a high level strategic policy direction. It can however be stated that not setting any parameters for flood management as described by Option 1 will lead to an absence of an overarching strategy which itself will lead to resource inefficiency

and little basis upon which to co-ordinate stakeholder groups. As such negative impacts have been assessed across the SEA Framework. Weaker negative connotations have been assessed for Option 3 which seeks to set ambitious parameters for flood intervention. This is due to the fact that it is already stated that there is not the ability to fully resource this approach. As such, whilst benefit will be realised in some areas, this will be to the detriment of others. Option 3 does not stipulate which areas of flood management will be prioritised in the advent of a shortfall in resources and as such a broad but weaker negative assessment has been made against this option. The one exception is the stronger negative impact realised against SEA objective 3 which seeks to promote human health and wellbeing. This assessment has been made as the raising of expectation which cannot be met by stating an unachievable strategy direction will impact on the notion of wellbeing when it cannot be delivered. Option 2 (Prudent Parameters) is considered to be the most sustainable option and performs strongly against all the SEA objectives. This approach seems deliverable in the first instance and also does not seek to prioritise spatial areas or areas of flood risk management prior to carrying out informed reviews. This option therefore allows for the most sustainable distribution of resources and will ensure, so far as is possible, that no single theme is negatively impacted upon due to a lack of resources or neglect through uninformed decision making.

2.5 Issue 5: Investment in Flood Risk Management Projects

Funding is available for practical flood risk reduction projects nationally and regionally but is likely to only contribute a proportion of total costs. There are numerous potential sources of funding either through direct contribution or loans but again are unlikely to fully fund projects to manage existing flood risk. Defra have committed to fully fund the Lead Local Authority Role (for Hertfordshire County Council the funding available is £207,200 in 2011-2012 and £548,100 in 2012-13, 2013-14 and 2014-15) and within that funding there is some scope to fund capital projects.

OPTIONS

1. **No Direct Investment** – projects have to be fully funded from national / regional funding or third party sources.
2. **Limited Investment** – ad hoc funding linked to opportunity (may be difficult) to plan projects that require contributions from others and may not get best value through procurement).
3. **Planned and Programmed** – funding for development of capital bids for projects is made available and planned over a number of years. Some of the funding is made available for a modest capital programme.

TABLE 5: SA/SEA APPRAISAL MATRIX FOR ISSUE 5

Option	Obj 1	Obj 2	Obj 3	Obj 4	Obj 5	Obj 6	Obj 7	Obj 8	Obj 9
1. No Direct Investment	-	-	-	-	-	-	-	-	-

2. Limited Investment	-	-	-	-	-	-	-	-	-
3. Planned and Programmed	+	+	+	+	+	+	+	+	+

COMMENTARY

Again, a broad approach to the SEA of this issue has had to be taken due to an absence of detail in what is a high level strategic policy direction. In the supporting text to Issue 5 it is clearly stated that national and regional funding will only cover a proportion of the total costs required to fund flood risk reduction projects and as such Option 1, which presents the notion of not directly allocating local level financial resources, will not realise enough resources to adequately fund some projects. As no prioritisation of projects is offered in Option 1 a strongly negative impact assessment has been applied across the SEA Framework under the assumption that there will be no direct prioritisation and as such all receptors as defined by the SEA objectives will experience negative impacts when projects cannot go forward due to a lack of funding. Option 2, that of limited investment, is assessed as having a relatively more positive impact across the SEA Framework but an 'ad-hoc' approach by definition lacks a strategic element and as such is not seen as being able to realise as strong a benefit as the more managed approach offered by Option 3. An ad-hoc approach may result in financial resources being allocated to an existing project which could be to the detriment of a future project which may realise more benefit. A strong positive assessment has not been assessed for Option 3 however as the option does not indicate whether such an approach would realise the full funding that will be required for flood risk mitigation or any areas of prioritisation, either thematic or spatial, should insufficient funding exist.

2.6 Issue 6: Partnership and Collaboration

There are a number of organisations with statutory roles and others with an interest in local flood risk management. Opportunities for cooperation and the benefits that may be gained are likely to be identified in the local strategy. Relevant organisations have to act consistently with and/or have due regard for the strategy but there is no statutory requirement to form a partnership.

OPTIONS

1. **No Formal Partnership** – Hertfordshire County Council provides governance for the strategy and other bodies act as required. This is likely to result in a lack of co-ordination and no improvement in gaining most effective use of resources.
2. **Limited Partnership** – a core group is convened to guide strategic implementation of the strategy and where no suitable groups currently exist, topic groups are developed as and when required to guide implementation.
3. **Full Partnership Working** – all local Risk Management Authorities meet regularly as a single group to consider all aspects of implementation of the local flood risk management strategy.

TABLE 6: SA/SEA APPRAISAL MATRIX FOR ISSUE 6

Option	Obj 1	Obj 2	Obj 3	Obj 4	Obj 5	Obj 6	Obj 7	Obj 8	Obj 9
1. No Formal Partnership	-	-	-	-	-	-	-	-	-
2. Limited Partnership	/	/	/	/	/	/	/	/	/
3. Full Partnership Working	++	++	++	++	++	++	++	++	++

COMMENTARY

A detailed appraisal cannot be made against this issue as there is an absence of detail surrounding which working groups would be in scope of any plans for partnership working. The advantages of partnership working are clear in that it allows for the pooling of knowledge between disparate stakeholders as well as a more efficient co-ordination of time and resources and as such Option 1 (No formal partnership) would result in negative impacts across the SEA Framework relative to the other options.

It is considered that at this stage it is not possible to derive potential impacts on the SEA Framework from Option 2 (Limited Partnership). It can be stated that the impacts would be less negative than Option 1, but because a list of stakeholders does not form part of the supporting text for Option 2, it is not possible to assess individual impacts for each objective. It is surmised that those objectives covered by the interests of stakeholders will have stronger positive impacts than those which are not. Option 2 also suggests that groups will be convened as and when they are needed. Such an approach, particularly if these groups are subsequently disbanded, will mean it will be harder for individual stakeholders to be fully engaged in all aspects of the process. Option 3 (Full Partnership Working) is assessed as being the most sustainable option. Not only will this ensure that each theme as presented by the SEA Framework will have stakeholders with that area of professional interest, it is stated that these will all meet regularly as a single group. Such an approach allows for each stakeholder to consider the possible implications of proposals outside of their remit but which may impact upon it. The strong positive assessment assumes that there are adequate resources to facilitate such a working group.

2.7 Issue 7: Individuals need to be more Involved in Managing Flood Risk

Unless people have suffered flooding or have had a near miss they are unlikely consider taking measures to improve flood resilience and may see it as the responsibility of the authorities. However no-one has a legal right to protection from flooding or to benefit from flood risk reduction to any specified level. So individuals need to be encouraged and empowered to take responsibility for managing their own flood risk.

OPTIONS

1. **No Action** – only respond to requests for information and only engage with individuals and communities when developing practical flood risk management measures. Impacts of flooding will potentially be greater than if people were aware of the need to make basic plans and preparation.
2. **Basic Awareness** – make information about potential flood risk available so that people can make informed decisions. Promote links to information produced by the Environment Agency, National Food Forum and other bodies.
3. **Engage Individuals and Communities** – work with stakeholders in localities to involve them in the management of flood risk especially in areas where there are no feasible risk reduction

TABLE 7: SA/SEA APPRAISAL MATRIX FOR ISSUE 7

Option	Obj 1	Obj 2	Obj 3	Obj 4	Obj 5	Obj 6	Obj 7	Obj 8	Obj 9
1. No Action	-	0	-	0	0	0	0	0	-
2. Basic Awareness	+	0	+	0	0	0	0	0	+
3. Engage Individuals and Communities	++	0	++	0	0	0	0	0	++

COMMENTARY

Public engagement is key to reducing the effects of flooding on a localised level as there are steps that can be taken by any individual to aid the safeguarding of their property from the effects of flooding. As such there is a clear progression of impact on relevant indicators, from the negative impact that would be realised from making little to no attempt at public engagement to the positive impacts of proactively engaging individuals and communities. An engaged community can take many steps to reduce the potential impact of flooding, through individual measures to safeguard personal dwellings to having community wide contingency plans should a flooding event occur. It is the possible facilitation of a community wide strategy that affords Option 3 (Engage with Individuals and Communities) a stronger positive performance than Option 2 (Basic Awareness).

2.8 Issue 8: Sustainability

There needs to be regard for sustainable development in the delivery of the local flood risk management strategy. The powers related to flood risk management allow projects to be developed that deliberately flood areas as well as those that reduce the likelihood or severity of flooding. Some of the opportunities will be picked up in the Strategic Environment Assessment.

OPTIONS

1. **No Positive Action** – cause no environmental deterioration

2. **Do Minimum** – look for opportunities to enhance flood risk management projects to gain environmental benefits.
3. **Improve** – use flood risk management powers to develop an environmental enhancement programme to manage water in areas for the benefit of wildlife. Flood risk reduction for people and property in these cases would not be the main aim but may be a secondary benefit.

TABLE 8: SA/SEA APPRAISAL MATRIX FOR ISSUE 8

Option	Obj 1	Obj 2	Obj 3	Obj 4	Obj 5	Obj 6	Obj 7	Obj 8	Obj 9
1. No Positive Action	0	0	0	0	0	0	0	0	0
2. Do Minimum	0	0	0	0	0	+	0	0	0
3. Improve	/	/	/	/	/	++	/	/	/

COMMENTARY

This issue has been assessed as applying solely to biodiversity amenity although it is recognised that the delivery of what are essentially green projects will have implications across much of the rest of the SEA Framework. Option 1 (No Positive Action) has been assessed as having a neutral effect on biodiversity as it is clearly stated that no environmental deterioration will be accepted. Option 3 (Improve) would have more positive benefits towards achieving the protection and enhancement of biodiversity (Obj 6) than Option 1 (No Positive Action) and Option 2 (Do Minimum), but there will likely be funding implications of following this policy option, particularly if followed to an extreme, which could mean that various mitigation measures designed to protect property, historic amenity or infrastructure are unable to be delivered. Without an explanation of funding implications or priorities for action, it is not possible to assess the impact of Option 3 on all objectives other than Objective 6 as being anything other than uncertain. It is considered that this uncertainty could be resolved primarily through stating that funding commitments made under this option would be proportional and would not result in funding gaps in other areas of flood mitigation. The uncertainty is also reduced when this Issue and Option is assessed in conjunction with other preferable options.

3 CONCLUSION

TABLE 9: AMALGAMATION OF MOST SUSTAINABLE OPTIONS

Issue / Option	Obj 1	Obj 2	Obj 3	Obj 4	Obj 5	Obj 6	Obj 7	Obj 8	Obj 9
Issue 1: Level of Local Flood Risk Option 3: Improve	++	++	++	++	+	0	+	0	++
Issue 2: Understanding Flood Risk Option 2: Pragmatic Analysis	++	++	++	++	++	++	++	++	++
Issue 3: Collecting of Flood Data Option 3: High Investment	++	++	++	++	++	++	++	++	++
Issue 4: Parameters Option 2: Prudent Parameters	++	++	++	++	++	++	++	++	++
Issue 5: Investment in Flood Risk Management Projects Option 3: Planned and Programmed	+	+	+	+	+	+	+	+	+
Issue 6: Partnership and Collaboration Option 3: Full Partnership Working	++	++	++	++	++	++	++	++	++
Issue 7: Individuals need to be more Involved in Managing Flood Risk Option 3: Engage Individuals and Communities	++	0	++	0	0	0	0	0	++
Issue 8: Sustainability Option 3: Improve	/	/	/	/	/	++	/	/	/

CONCLUSION COMMENTARY

An amalgamation of those options considered to be the most sustainable seems to accord strongly with the SEA Framework, with all SEA Objectives being impacted upon positively across a number of issues. It is considered that the uncertainty assessed under Issue 8, which resulted from uncertainty surrounding the level of resources that would be devoted to biodiversity projects, and the subsequent impact on the ability to direct resources to other areas of importance, would be satisfactory addressed through the need to accord with the options presented for other issues.

It is however noted that at present the issues and options presented are of a high level strategic nature and can only be appraised relative to each other. As such, whilst the notions supported within the above chosen options should result in

development and practice which would be inherently and holistically sustainable, this can only be assured in subsequent rounds of the LFRMS document where practical details and a baseline-led spatial component will be introduced. Nonetheless, those options chosen in Table 9 above provide a strong basis for a sustainable approach to flood management within Hertfordshire.