

Impact Assessment



Assessment of: Devon Local Flood Risk Management Strategy

Service: Planning, Transportation and Environment

Head of Service: Dave Black

Version / date of sign off by Head of Service: 18 January 2021

Assessment carried out by (job title): Jessica Bishop, Senior Flood and Coastal Erosion Risk Officer

1. Description of project / service / activity / policy under review

Devon County Council is the Lead Local Flood Authority (LLFA) for the Devon County area. Under flood risk management legislation, LLFAs have various responsibilities for local flood risk management, including maintaining a local flood risk management strategy. Initially produced in 2014, this local strategy is now up for review.

Devon's local flood risk management strategy outlines Devon County Council's roles and responsibilities as LLFA, as well as those of other Risk Management Authorities and how we should work together. In addition, the local strategy sets out priority communities and an annual investment plan for flood risk management measures.

The local strategy touches on all flood risk management authorities in Devon but concentrates on how Devon County Council will continue to

implement their responsibilities and duties.

2. Reason for change / review

Under the Flood and Water Management Act 2010, the local strategy requires reviewing every 6 years. The previous edition for 2014-2020 will be reviewed and updated in line with the [National Flood and Coastal Erosion Risk Management Strategy](#).

3. Aims / objectives, limitations and options going forwards (summary)

Aims and objectives

The high level vision of Devon's Local Flood Risk Management Strategy is *'To be a leading authority in the management and reduction of flood risk in the County of Devon'*. This will be achieved through the following 8 objectives:

1. We will reduce flood risk to properties and significant infrastructure, and enhance the local economy - Measured by the number of communities, properties and significant infrastructure with reduced flood risk as a result of intervention by Risk Management Authorities.
2. We will co-ordinate Risk Management Authorities and encourage collaborative working - By the successful delivery of Devon's Flood Risk Management Action Plan collaborated through the Devon Flood and Water Management Group
3. We will protect and enhance the natural environment, landscape and heritage assets, providing opportunities for carbon storage, energy generation and access and recreation where appropriate - By following DCC internal environmental review processes and measuring environmental net-gain and change in the condition of heritage assets as a result of intervention by Risk Management Authorities
4. We will prioritise high risk communities - Through our prioritisation criteria to identify at risk communities
5. We will influence the planning process through our role as statutory consultee - Measured by the volume of planning applications assessed
6. We will set out a clear strategy - Evidenced by the production of this document
7. We will ensure the latest climate change predictions are incorporated into flood schemes and development proposals - By following the latest UK Climate Projections
8. We will improve resilience through community engagement and education - Measured by the number of communities positively engaged and with emergency plans

Limitations of the local strategy

How Devon County Council fulfils its duties as LLFA can have a significant impact on people at risk of flooding. The devastating impacts of flooding or the worry of being at risk can have huge impact on people's lives and wellbeing. Unfortunately, we cannot help everybody at once or always find a quick solution, therefore risk across the County must be assessed and communities prioritised.

The rural nature of Devon means that the usual risk based approach, focusing on larger and more populated areas for investment in flood risk management is not always appropriate as this can lead to prioritising densely urban areas where the count of properties flooded is high, rather than rural areas where a small number of properties may have been affected on several occasions. The large number of agricultural businesses in the area could also be potentially overlooked in favour of protected businesses in urban areas.

For Devon's local strategy, the threshold to identify a 'significant' flood in historic records was reduced from the nationally used figures to reflect the rural nature of Devon and the fact that in storm events, many smaller communities across the County are affected rather than one large urban location. This is consistent with other neighbouring LLFAs across the South West Region with similar urban/rural distributions of the population.

Socio-economic issues also play a part here, where urban areas could potentially be populated by deprived members of the population. Therefore, a balance needs to be met in how the flood risk in urban and rural areas is addressed.

Options going forward

Options going forward as a result of this Equality Impact Assessment are analysed in Section 8 (Equality Analysis) and various recommendations are made for changes or additions to existing measures in the local strategy. This is summarised in Section 4 (People affected and their diversity profile, measures to address in the local strategy).

These recommendations include raising awareness, in particular, targeting vulnerable groups at risk of flooding and using plain English. It is anticipated that the Devon Resilience Community Forum is the best platform for this. Vulnerability should also be assessed in high risk locations where flood investigations and schemes are being progressed.

Devon County Council's own Property Flood Resilience funding scheme is also highlighted as a useful tool to target vulnerable members of the community.

The local strategy document itself and associated documents and website should also be as widely accessible as possible, complying with legal accessibility requirements.

4. People affected and their diversity profile

People affected

People affected by this local strategy are those that are directly impacted by flood risk issues. Such as the general public at risk of flooding, those affected by land drainage issues, those with watercourses through their land and those affected by any development sites with surface water flooding implications. In addition to this people may also be affected by any physical works we do as part of a flood alleviation scheme. This can be positive, where their flood risk is reduced, or the physical impacts of engineered works could potentially be negative. Individual impact assessments and planning permissions as part of building a flood scheme should cover and address any negative impacts here.

We know where many of the high-risk areas are in Devon and so can make an assessment of risk across the county. However, the nature of flooding is that it is unpredictable (or has very short notice) when these possible incidents will occur. The Local Flood Risk Management Strategy outlines how we manage this risk for people across Devon, ensuring as much as we can that no group of people, particularly vulnerable people are impacted more negatively. This is through pro-active work to protect communities and increase awareness and resilience, and also through reactive work following flooding to a location.

Measures to address this in the local strategy

The local strategy and resulting principles and actions will directly affect residents of Devon and various vulnerable groups of people at risk of flooding. Measures are put in place as part of the strategy in the form of a series of principles and criteria of how and when we will prioritise and carry out flood risk management investigations and works. The following taken from the strategy document consider vulnerable members of the community or give an opportunity to be taken forward further in order to improve flood risk to vulnerable groups and reduce any potential negative impact:

1. *Principle 15: Raising Awareness and Improving Communication and Involvement. Through the collaboration with other Risk Management Authorities and the Devon Community Resilience Forum, all Partners will work together towards raising public awareness (including those that are most vulnerable such as the elderly, young children, those living with a disability or living in areas of deprivation) about flood risk and the roles of the Risk Management Authorities, providing clear and up to date information.*

Recommendation for this to be targeted at vulnerable groups to ensure they are aware of any risk and prepared, to maximise their resilience. When working with communities and developing emergency plans, it will be encouraged for specific reference to be made to identify vulnerable members of the community that will need assistance. This work will be done through work with Devon's Community Resilience Forum.

Recommendation for same approach as communicating the local strategy documents themselves, using plain English and very simplified explanations in communications and promotions. This will be done through working closely with Devon's Community Resilience Forum.

2. *Principle 16: Property Flood Resilience. When wider flood alleviation schemes for a community or individual property are not viable or unable to be delivered in the foreseeable future, Risk Management Authorities will remain committed to making properties more resilient to flooding through the installation of Property Flood Resilience measures where possible.*

Recommendation to take a proactive approach in community engagement to target the promotion property flood resilience with communities with known older populations or those with disabilities that are more vulnerable to the impacts of flooding.

Recommendation to ensure that any applicants where English is not their first language that if needed, they have access to a clear warning service that they understand or to install permanent measures which do not rely on the resident installing measures themselves at times of high flood risk.

3. Flood investigation threshold (See Appendix A). This includes a significance threshold to trigger an official flood investigation under Section 19 of the Flood and Water Management Act 2010. It requires vulnerable people to be considered when determining if a flood investigation report with recommendations is required. It also takes into account the rural nature of Devon and small communities that are affected by flooding.

As the investigation reports are very reactive and limited research can be done, it is unlikely that this vulnerable group of a community would be highlighted. Recommendation to continue with implementing this criteria and publishing the investigation reports in an accessible format.

4. Prioritisation criteria and analysis (see Appendix B). Already includes vulnerable people to be considered when prioritising communities and allocation of funding and resources. It also takes into account both urban and rural areas at risk of flooding.

However, some communities will find that they are the focus of flood risk management improvement measures over another. Tensions arising as a result of this should be addressed through good community engagement and raising awareness through this local strategy.

Figures on people with limited mobility/disabilities for each Devon parish could be added to our prioritisation model for prioritising flood risk communities. However, this is a lengthy and complex technical task and therefore currently not able to accompany this local strategy.

Recommended that a more accurate approach may be to assess community vulnerability once a particular location has been brought to our attention and make a more detailed assessment of disability in the area to include in the detailed investigation to determine impacts and calculate economic and social damages.

5. Priority communities. Part 2 of the local strategy outlines how we will prioritise communities at risk of flooding, followed by a list of priority communities for future investigation and investment in flood risk management measures over the next 6 years.
6. Action Plan. Part 3 of the local strategy is updated annually and shows the areas of investment in flood risk management measures across

Devon for the current financial year.

Recommended to carry out impact assessments for flood schemes to identify any necessary individual and appropriate measures that are to be put in place to ensure individuals fully understand any potential impacts on them, together with their rights and responsibilities.

Any major flood schemes and projects will be subject to an Equality Impact Assessment if not covered by this assessment to ensure that no particular group of people are negatively affected and that any publications or methods of reporting are accessible to the whole community affected.

The local strategy document itself is a measure being used to carry out Devon County Council's role as LLFA. The communication of this strategy and supporting documents will assist in raising awareness in communities and evidencing how we will address flood risk management issues over the next investment period up to 2027. Therefore, the strategy document itself and supporting documents must be accessible to as wider audience as possible. The document has been assessed alongside its development to ensure content is accessible and making as much available as web pages where possible.

Diversity profile

The characteristics most likely to be affected by flood risk are age and disability, as these two can make people more vulnerable to physical risks, as they may not be able to take action themselves or seek information to help. In Devon, the highest number of residents are aged between 55 and 74, making up 27.5% of the population ([Protected Characteristics – Facts and Figures](#))

Disability is also a significant characteristic if at risk of flooding. Devon's [long-term health problem or disability](#) figures show numbers of those with limited day to day activities as a result of long term illness or disability for Parishes across Devon. The break down of these figures for parish areas does still not indicate if those people are at risk of flooding. In addition, these figures aren't represented as a percentage of the population, so larger population areas will have larger figures. Naturally, the larger more urban areas will have higher figures. These are often the areas with higher risk of flooding to large numbers of properties.

Appendix C lists a few locations within each District area which showed relatively high numbers of those with limited day to day activities as a result of long-term illness or disability.

As part of Devon's Property Flood Resilience funding scheme application process, we ask if the applicant considers themselves to be vulnerable. Out of 98 applications (since April 2017 – April 2020), 45% of applicants considered themselves to be vulnerable. With any vulnerable applicants we will ensure that the measures installed are passive and require no intervention or that they have access to help with any requirements of the installations.

When determining if a high number of disabled people are at risk of flooding in an area, a detailed assessment of individual communities would be required to understand where the vulnerable are located and if they are at risk of flooding. These figures are not proportional or detailed enough location wise.

Our assessment of communities at risk is done on the Parish scale and these figures could be added to the model which would highlight areas with high flood risk and high levels of disability. As recommended above, a more accurate approach may be to assess this once a particular location has been brought to our attention. We could then make a more detailed assessment of disability in the area and include this in the detailed investigation to determine potential impacts and then calculate economic and social damages.

The elderly may find barriers with using internet and emails due to unawareness and inexperience. However, there is a fairly high amount of elderly customers in touch with our team and they often come through this route. There may not be a high level of awareness of what our team does and how we can help, but through working with our partners such as District Councils and EA, they will refer people to us when relevant and we can help. The older generation still send in letters, which always reach the team and relevant officers.

It is a possibility that more elderly people live in rural locations, which are often near watercourses or in steep valleys prone to flooding. However, there is no data available on this.

It is not clear if any particular vulnerable group has a greater dependence on our service. However, it is certain that the impacts of flooding on vulnerable groups will be greater than on non-vulnerable groups.

5. Stakeholders, their interest and potential impacts

Flood risk management stakeholders, such as staff from the Environment Agency, District Councils and South West Water, in addition to developers.

6. Research used to inform this assessment

To inform this assessment, facts and figures from Devon County Council Equality and Diversity web pages have been used, such as [Protected Characteristics – Facts and Figures](#) and [long-term health problem or disability](#). All other information is from the local strategy consultation document itself.

In order to fairly prioritise our flood risk management work (parts 2 and 3 of local strategy document) data analysis has been carried out taking into account local flood risk data, critical/vulnerable infrastructure information such as locations of schools, care homes, hospitals etc. and an assessment of how resilient or vulnerable a community/parish is to flood risk.

7. Description of consultation process and outcomes

[If this assessment is currently draft, describe how you are going to consult (if relevant and necessary) and update the results here for your final version. Delete this note and insert text here...]

The draft local strategy and supporting documents have been subject to public consultation. The consultation period ran from 21st August – 15th October 2020, a period of 8 weeks.

The consultation documents included the main strategy document, which included links to our online annual action plan and Strategic Environmental Assessment documents. The annual action plan and list of priority communities for the next 6 years were also available to view on our online mapping service.

The public and professional partners were invited to make comments and provide valuable feedback on the strategy documents via the online form or by emailing the Flood and Coastal Risk Management Team direct.

Partner authorities were made aware of the consultation by email to direct contacts and to Chief Executive officers too. Parish and Town Councils were also contacted and a press release was made available.

Consultees:

District Councils/Planning Authorities

Environment Agency

South West Water

Internal Drainage Boards

Highway Authorities

Network Rail

DCC Emergency Planning

DCC Planning

DCC Transport Planning

Natural England

English Heritage

All Parish and Town Councils

Following the conclusion of the public consultation, responses were collated in a formal log, indicating the LLFA view on the points raised and a recommendation on any proposed amendment to the draft local strategy.

Based on this overall log, a short summary of the responses was compiled highlighting the general range of issues addressed and picking-up on any particularly significant or controversial issues, whilst also showing how these will be addressed through the final Strategy.

A summary overview of the consultation response was submitted to Devon County Council Scrutiny Committee Members.

Changes and amendments to the strategy were agreed with the Local Flood Risk Management Project Board and approved by DCC Cabinet in February 2020.

8. Equality analysis

Giving Due Regard to Equality and Human Rights

The local authority must consider how people will be affected by the service, policy or practice. In so doing we must give due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations.

Where relevant, we must take into account the protected characteristics of age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, sexual orientation, race, and religion and belief. This means considering how people with different needs get the different services they require and are not disadvantaged, and facilities are available to them on an equal basis in order to meet their needs; advancing equality of opportunity by recognising the disadvantages to which protected groups are subject and considering how they can be overcome.

We also need to ensure that human rights are protected. In particular, that people have:

- A reasonable level of choice in where and how they live their life and interact with others (this is an aspect of the human right to 'private and family life').

- An appropriate level of care which results in dignity and respect (the protection to a private and family life, protection from torture and the freedom of thought, belief and religion within the Human Rights Act and elimination of discrimination and the promotion of good relations under the Equality Act 2010).
- A right to life (ensuring that nothing we do results in unlawful or unnecessary/avoidable death).
- The Equality Act 2010 and other relevant legislation does not prevent the Council from taking difficult decisions which result in service reductions or closures for example, it does however require the Council to ensure that such decisions are:
 - Informed and properly considered with a rigorous, conscious approach and open mind, taking due regard of the effects on the protected characteristics and the general duty to eliminate discrimination, advance equality and foster good relations.
 - Proportionate (negative impacts are proportionate to the aims of the policy decision)
 - Fair
 - Necessary
 - Reasonable, and
 - Those affected have been adequately consulted.

<p>Characteristics</p>	<p>Potential or actual issues for this group.</p> <p>[Please refer to the Diversity Guide and See RED]</p>	<p>In what way will you:</p> <ul style="list-style-type: none"> • eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. • advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible. • foster good relations between groups (tackled prejudice and promoted understanding), if relevant? <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the DCC Equality Policy?</p>
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<p>All residents (include generic equality provisions)</p>	<p>Some residents will benefit from community engagement, flood alleviation measures or assistance with resolving a land drainage issue in priority over others.</p>	<p>Devon’s local strategy includes several measures to ensure that flood risk management is fairly delivered to those in need. The following measures highlighted in Section 4 help address this:</p> <ul style="list-style-type: none"> • Principle 15: Raising awareness and improving communication and involvement. This is intended to reach as many residents as possible that are at risk of flooding. • Principle 16: Property Flood Resilience. Devon’s Property Flood Resilience funding scheme is available for all members of the public to apply for. Property Flood Resilience is also a measure which can be implemented on larger scales across a community if a large flood scheme is not viable. This means that those communities can still be offered some form of flood protections and resilience. • Flood investigation threshold. If the threshold in Appendix A is reached, any location in Devon that has suffered from flooding can be subject to an investigation report and resulting recommended actions for Risk Management Authorities to take forward. It takes into account the rural nature of Devon and small communities that are affected by flooding, so should fairly take into account the nature of flooding and affected communities in Devon. • Prioritisation criteria and analysis outlined in Appendix B takes into account both urban and rural areas at risk of flooding to reach as many at risk communities as possible. However, some communities will find that they are the focus of flood risk management improvement measures over another. Tensions arising as a result of this should be addressed through good community engagement and raising awareness through this strategy. • Part 2 of the strategy outlines how we will prioritise communities at risk of flooding, followed by a list of priority communities for future investigation and investment in flood risk management measures over the next 6 years. Again, some communities will find that they are the focus of flood risk
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		<p>management improvement measures over another. Tensions arising as a result of this should be addressed through good community engagement and raising awareness through this strategy.</p> <ul style="list-style-type: none"> • The Action Plan is updated annually and shows the areas of investment in flood risk management measures across Devon for the current financial year. Any resulting major flood schemes and projects will be subject to an Equality Impact Assessment if not covered by this assessment to ensure that no particular group of people are negatively affected and that any publications or methods of reporting are accessible to the whole community affected.

<p>Age</p>	<p>Communication issues:</p> <p>Elderly members of communities may have difficulty in accessing material and reading advice about flood risk, due to poor eyesight, no internet access or being unable to get out to local community events and meetings.</p> <p>In the promotion of the local strategy and raising flood awareness in Devon, a wide range of communication methods will be used, from local Town and Parish Councils to press releases and social media updates.</p> <p>The Summary of the local strategy will be a very simplified explanation of the main and supporting documents aimed at the public, using plain English.</p> <p>Mobility issues:</p> <p>Elderly members of communities may have difficulty moving around inside and outside of their home and be less able to help themselves, which could put them in danger in the event of a flood.</p> <p>The prioritisation criteria for identifying areas for investment in</p>	<p>The following measures highlighted in Section 4 can help address any potential issues for those where age is causing vulnerability or is being negatively impacted by the local flood risk management strategy.</p> <ul style="list-style-type: none"> • Principle 15: Raising Awareness and Improving Communication and Involvement. It is highlighted that this is particularly important for those that are most vulnerable such as the elderly, young children, those living with a disability or living in areas of deprivation <i>Recommendation for this to be targeted at vulnerable groups to ensure they are aware of any risk and prepared, to maximise their resilience. When working with communities and developing emergency plans, it will be encouraged for specific reference to be made to identify vulnerable members of the community that will need assistance. This work will be done through work with Devon's Community Resilience Forum.</i> • Principle 16: Property Flood Resilience. As part of Devon's Property Flood Resilience funding scheme application process, we ask if the applicant considers themselves to be vulnerable. With any vulnerable applicants we will ensure that they have access to help with any requirements of the measure to be installed. <i>Recommendation to take a proactive approach in community engagement to target the promotion property flood resilience with communities with known older populations that are more vulnerable to the impacts of flooding.</i> • Flood investigation threshold (See Appendix A). This requires vulnerable people to be considered when determining if a flood investigation report with recommendations is required. It also takes into account the rural nature of Devon and small communities that are affected by flooding. • Prioritisation criteria and analysis (see Appendix B) already includes vulnerable people to be considered when prioritising communities and
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	<p>flood risk management will need to identify areas with vulnerable community members, such as the old or those living with a disability. Planned works, schemes and community action plans in these locations will reduce the flood risk and reduce any danger to the vulnerable population. Emergency plans will make specific reference to identifying vulnerable members of the community that will need assistance.</p>	<p>allocation of funding and resources.</p> <p><i>Figures on people with limited mobility/disabilities for each Devon parish could be added to our prioritisation model for prioritising flood risk communities. However, this is a lengthy and complex technical task and may not be able to accompany this local strategy. Individual locations should be assessed once flood investigations and schemes are being progressed.</i></p> <p>Any resulting major flood schemes and projects will be subject to an Equality Impact Assessment if not covered by this assessment to ensure that no particular group of people are negatively affected and that any publications or methods of reporting are accessible to the whole community affected.</p> <p>The local strategy document itself is a measure being used to carry out Devon County Council's role as LLFA. The communication of this strategy and supporting documents will assist in raising awareness in communities and evidencing how we will address flood risk management issues over the next investment period up to 2027. Therefore the strategy document itself and supporting documents must be accessible to as wider audience as possible.</p> <p>The document has been assessed as developed to ensure content is accessible</p>

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		<p>and making as much available as web pages where possible.</p>

<p>Disability (incl. sensory, mobility, mental health, learning disability, neurodiversity, long term ill health) and carers of disabled people</p>	<p>Communication issues: Those living with a disability such as a mental health condition, learning difficulties or other brain/cognitive condition may have difficulty with understanding or communication.</p> <p>In the promotion of the local strategy and raising flood awareness in Devon, a wide range of communication methods will be used, from local Town and Parish Councils to press releases and social media updates.</p> <p>The Summary of the local strategy will be a very simplified explanation of the main and supporting documents aimed at the public, using plain English.</p> <p>In addition to this, documents with larger print for example could be arranged on request for those with visual impairments.</p> <p>Accessibility checks will be carried out on the finished document and all key information will be available online.</p> <p>Mobility issues: Those living with a physical disability</p>	<p>The following measures highlighted in Section 4 can help address any potential issues for those where a disability is causing vulnerability or is being negatively impacted by the local flood risk management strategy.</p> <ul style="list-style-type: none"> • Principle 15: Raising Awareness and Improving Communication and Involvement. It is highlighted that this is particularly important for those that are most vulnerable such as the elderly, young children, those living with a disability or living in areas of deprivation <i>Recommendation for this to be targeted at vulnerable groups to ensure they are aware of any risk and prepared, to maximise their resilience. When working with communities and developing emergency plans, it will be encouraged for specific reference to be made to identify vulnerable members of the community that will need assistance. This work will be done through work with Devon's Community Resilience Forum.</i> • Principle 16: Property Flood Resilience. As part of Devon's Property Flood Resilience funding scheme application process, we ask if the applicant considers themselves to be vulnerable. With any vulnerable applicants we will ensure that they have access to help with any requirements of the measure to be installed. <i>Recommendation to take a proactive approach in community engagement to target the promotion property flood resilience with known communities containing those with disabilities that are more vulnerable to the impacts of flooding.</i> • Flood investigation threshold (See Appendix A). This requires vulnerable people to be considered when determining if a flood investigation report with recommendations is required. It also takes into account the rural nature of Devon and small communities that are affected by flooding. • Prioritisation criteria and analysis (see Appendix B) already includes vulnerable people to be considered when prioritising communities and
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	<p>may have difficulty moving around inside and outside of their home and be less able to help themselves, which could put them in danger in the event of a flood.</p> <p>The prioritisation criteria for identifying areas for investment in flood risk management will need to identify areas with vulnerable community members, such as the old or those living with a disability. Planned works, schemes and community action plans in these locations will reduce the flood risk and reduce any danger to the vulnerable population.</p>	<p>allocation of funding and resources.</p> <p><i>Figures on people with limited mobility/disabilities for each Devon parish could be added to our prioritisation model for prioritising flood risk communities. However, this is a lengthy and complex technical task and may not be able to accompany this local strategy. Individual locations should be assessed once flood investigations and schemes are being progressed.</i></p> <p>Any resulting major flood schemes and projects will be subject to an Equality Impact Assessment if not covered by this assessment to ensure that no particular group of people are negatively affected and that any publications or methods of reporting are accessible to the whole community affected.</p> <p>The local strategy document itself is a measure being used to carry out Devon County Council's role as LLFA. The communication of this strategy and supporting documents will assist in raising awareness in communities and evidencing how we will address flood risk management issues over the next investment period up to 2027. Therefore the strategy document itself and supporting documents must be accessible to as wider audience as possible.</p> <p>The document has been assessed as developed to ensure content is</p>

<p>Characteristics</p>	<p>Potential or actual issues for this group.</p> <p>[Please refer to the Diversity Guide and See RED]</p>	<p>In what way will you:</p> <ul style="list-style-type: none"> • eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. • advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible. • foster good relations between groups (tackled prejudice and promoted understanding), if relevant? <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the DCC Equality Policy?</p>
		<p>accessible and making as much available as web pages where possible.</p>

<p>Culture and ethnicity: nationality/national origin, ethnic origin/race, skin colour, religion and belief</p>	<p>Communication issues: English may not be the first language of some members of the community and therefore may be a barrier to clearly communicating flood risk and raising awareness.</p> <p>In the promotion of the local strategy and raising flood awareness in Devon, a wide range of communication methods will be used, from local Town and Parish Councils to press releases and social media updates.</p> <p>The Summary of the Local Strategy will be a very simplified explanation of the main and supporting documents aimed at the public, using plain English.</p>	<p>The following measures highlighted in Section 4 can help address any potential issues for those where their culture and ethnicity is causing vulnerability or is being negatively impacted by the local flood risk management strategy.</p> <ul style="list-style-type: none"> • Principle 15: Raising Awareness and Improving Communication and Involvement. This does not directly address those where English may not be the first language of members of a community. <i>Recommendation for same approach as communicating the local strategy documents themselves, using plain English and very simplified explanations in communications and promotions. This will be done through working closely with Devon's Community Resilience Forum.</i> • Principle 16: Property Flood Resilience. Information not available in other languages. However clear contact details are available on the flood risk management website for contact to be made if further help or guidance is needed. As part of Devon's Property Flood Resilience funding scheme application process, we ask if the applicant considers themselves to be vulnerable. Those who are not confident with the English language and flood warnings etc. may consider themselves more vulnerable. <i>Recommendation to ensure that any applicants where English is not their first language that if needed, they have access to a clear warning service that they understand or to install permanent measures which do not rely on the resident installing measures themselves at times of high flood risk.</i> • Flood investigation threshold (See Appendix A). This requires vulnerable people to be considered when determining if a flood investigation report with recommendations is required. This does not directly address those where English may not be the first language of members of a community. <i>As the investigation reports are very reactive and limited research can be done, it is unlikely that this vulnerable group of a community would be</i>
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<p>Characteristics</p>	<p>Potential or actual issues for this group.</p> <p>[Please refer to the Diversity Guide and See RED]</p>	<p>In what way will you:</p> <ul style="list-style-type: none"> eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible. foster good relations between groups (tackled prejudice and promoted understanding), if relevant? <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the DCC Equality Policy?</p>
		<p><i>highlighted. Recommendation to continue with implementing this criteria and publishing the investigation reports in an accessible format.</i></p> <ul style="list-style-type: none"> Prioritisation criteria and analysis (see Appendix B) already includes vulnerable people to be considered when prioritising communities and allocation of funding and resources. Action plan. Members of a community where English is not their first language could be affected by any outcomes of the local strategy or proposed works. <p><i>Recommended to carry out impact assessments for flood schemes which will result in any necessary individual and appropriate measures to be put in place to ensure that individuals fully understand any impacts on them and their rights and responsibilities.</i></p> <p>The local strategy document itself is a measure being used to carry out Devon County Council's role as LLFA. The communication of this strategy and supporting documents will assist in raising awareness in communities and evidencing how we will address flood risk management issues over the next investment period up to 2027. Therefore the strategy document itself and</p>

<p>Characteristics</p>	<p>Potential or actual issues for this group.</p> <p>[Please refer to the Diversity Guide and See RED]</p>	<p>In what way will you:</p> <ul style="list-style-type: none"> • eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. • advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible. • foster good relations between groups (tackled prejudice and promoted understanding), if relevant? <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the DCC Equality Policy?</p>
		<p>supporting documents must be accessible to as wider audience as possible.</p> <p>The document has been assessed as developed to ensure content is accessible and making as much available as web pages where possible.</p>

Characteristics	Potential or actual issues for this group. [Please refer to the Diversity Guide and See RED]	<p>In what way will you:</p> <ul style="list-style-type: none"> eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible. foster good relations between groups (tackled prejudice and promoted understanding), if relevant? <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the DCC Equality Policy?</p>
Sex, gender and gender identity (including men, women, non-binary and transgender people), and pregnancy and maternity (including women's right to breastfeed)	<p>Mobility issues: Pregnancy can cause mobility issues.</p> <p>Mobility issues could affect vulnerability during a flood.</p>	<p>Mobility issues caused by pregnancy will be very temporary and difficult to monitor across the population in line with flood events and planned flood schemes.</p> <p>Any resulting major flood schemes and projects will be subject to an Equality Impact Assessment if not covered by this assessment to ensure that no particular group of people (including those with mobility issues) are negatively affected and that any publications or methods of reporting are accessible to the whole community affected.</p> <p>In the promotion of the local strategy and raising flood awareness in Devon, a wide range of communication methods will be used, from local Town and Parish Councils to press releases and social media updates. Information will be accessible online.</p>
Sexual orientation and marriage/civil partnership	N/A	N/A

<p>Other relevant socio-economic factors such as family size/single people/lone parents, income/deprivation, housing, education and skills, literacy, sub-cultures, 'digital exclusion', access to transport options, rural/urban</p>	<p>Socio-economic issues:</p> <p>Those living in deprived areas may be more likely to receive investment for flood risk management, due to methods of prioritising communities and towns by assessing the number of properties at risk.</p> <p>The prioritisation criteria for prioritising communities at risk of flooding and the methods used for assessing if an official flood investigation both include considerations to be taken into account that particularly affect or endanger the vulnerable, including those living in deprived areas. This will cover both urban and rural locations.</p> <p>Small rural communities with very few properties affected could be missed when prioritising flood risk management works due to the low number of properties affected.</p>	<p>The following measures highlighted in Section 4 can help address any potential issues for those where socio-economic issues are causing a negative impact on a particular group of people as result of the local flood risk management strategy.</p> <ul style="list-style-type: none"> • Principle 15: Raising awareness and improving communication and involvement. This is intended to reach as many residents as possible that are at risk of flooding. In deprived areas, this engagement may be more challenging and may need to consider different approaches. This can be done through the Devon Community Resilience Forum. • Prioritisation criteria and analysis outlined in Appendix B takes into account both urban and rural areas at risk of flooding. As part of the development of any flood scheme. Deprivation is taken into account when considering the economic benefits the scheme can offer through reduction in flood risk. • Part 2 of the local strategy outlines how we will prioritise communities at risk of flooding, followed by a list of priority communities for future investigation and investment in flood risk management measures over the next 6 years. Rural areas with high frequency flooding will be identified as such on the priority list and will be considered as fairly as possible alongside larger more densely populated urban areas. • Principle 16: Property Flood Resilience. It is recognised that offering support to small communities and groups with individual property protection may be more appropriate than investing in a flood defence scheme, which could be costly, with little economic benefit.
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9. Human rights considerations:

As part of this assessment, it has been considered how people will be affected by Devon's Local Flood Risk Management Strategy. Protected characteristics have been specifically taken into account in Section 8.

As part of the development of the local strategy, an 8 week public consultation has been completed. This has given the residents of Devon the opportunity to be made aware of our role and what help is available to them and also to feedback into the process to ensure that the strategy is fit for purpose.

All objectives, principles and criteria in the strategy aim to reach all members of society and for us to carry out our flood risk management role as fairly as possible.

10. Supporting independence, wellbeing and resilience. Give consideration to the groups listed above and how they may have different needs:

In what way can you support and create opportunities for people and communities (of place and interest) to be independent, empowered and resourceful?

Through raising awareness of flood risk, encouraging individuals to join up to the Devon Community Resilience Forum. This is a platform for developing local emergency plans, learning of other community projects and local solutions to flood risk problems. Access to funding opportunities is also promoted and facilitated through the Forum.

In what way can you help people to be safe, protected from harm, and with good health and wellbeing?

By delivering flood improvements in line with our current (and updated) local strategy, prioritising communities at risk, whilst taking in to account vulnerable members of the community.

In what way can you help people to be connected, and involved in community activities?

Again, through the Devon Community Resilience Forum which we promote in our local strategy, website and regular newsletters distributed to Parish and Town Councils.

11. Environmental analysis

An impact assessment should give due regard to the following activities in order to ensure we meet a range of environmental legal duties. The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please mark X in the relevant box below and proceed to section 12, otherwise complete the environmental analysis table):

Devon County Council's Environmental Review Process	X
Planning Permission	
Environmental Impact Assessment	
Strategic Environmental Assessment	X

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Reduce, reuse, recycle and compost:		All flood improvement schemes will look to reuse material wherever possible, reducing costs, transportation and carbon emissions.
Conserve and enhance wildlife:		All flood improvements will look to enhance the natural environment and improve biodiversity.
Safeguard the distinctive characteristics, features and special qualities of Devon's landscape:		The distinctive characteristics, features and special qualities of Devon's landscape will be protected or enhanced during any flood improvement works. Any significant affects will be mitigated.
Conserve and enhance Devon's cultural and historic heritage:		Due consideration will be given to ensure Devon's historic assets are protected and enhanced wherever possible.
Minimise greenhouse gas emissions:		Careful design and use of materials will aim to reduce the transportation and machinery usage to minimise greenhouse gases and help towards a zero net carbon.
Minimise pollution (including air, land, water, light and noise):		Careful design and use of materials will aim to reduce the transportation and machinery usage to minimise pollution.
Contribute to reducing water consumption:		Design considerations will make space for water.

Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level):		All flood improvement studies, works and advice given will have due regard to the effects of climate change and the current future predictions will be taken into account to ensure the standard of protection is maintained.
Other (please state below):		

12. Economic analysis

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Impact on knowledge and skills:		Community engagement and promotion of this local strategy and supporting documents should improve knowledge about flood risk and how to find out relevant information.
Impact on employment levels:	N/A	N/A
Impact on local business:		One of the main impacts of implementing the Local Flood Risk Management Strategy will be the improved protection of homes and businesses from flooding, resulting in more resilient communities and economy.

13. Linkages or conflicts between social, environmental and economic impacts (Combined Impacts):

Locations with high numbers of properties at risk of flooding tend to be urban areas. Densely populated urban areas are more likely to contain social housing or low income households, some considered as deprived areas and more vulnerable to the impacts of flooding. The prioritisation criteria (Appendix B) in the Local Flood Risk Management Strategy considers with high weighting, the number of properties at risk in an area when allocating funding and prioritising flood investigations and schemes. The threshold for investigating flood events is also linked the number of properties flooded.

However, there are many rural locations with small communities and individuals at risk of flooding. These locations may also contain vulnerable people and therefore a balance is needed in the investigations and prioritisation of funding and flood schemes to ensure that the process is fair to all residents of Devon, whilst considering the needs of those that are most vulnerable.

14. How will the economic, social and environmental well-being of the relevant area be improved through what is being proposed? And how, in conducting the process of procurement, might that improvement be secured?

The local strategy aims to reduce flood risk and to protect communities, economy and natural environment. It even aims to enhance these. This will be achieved through our objectives highlighted in Section 3.

For all flood risk management activities, Devon County Council procurement rules are followed. We have a framework and term consultants already in place for delivering studies, works and flood schemes.

15. How will impacts and actions be monitored?

Impacts will be monitored through evidence of better protected communities during flood events and communities with raised awareness of flood risk.

Community engagement through the Devon Community Resilience Forum is a good platform for ensuring communities are aware of our role and an opportunity to feedback to the Flood Risk Management Team.

Appendix A: Flooding significance thresholds

Flooding significance thresholds

Investigation reports under Section 19 of the Flood and Water Management Act will be considered by DCC for events with a significance threshold level of:

5 or more residential properties internally flooded (in one area, e.g. one street)

2 or more commercial properties internally flooded.

Critical infrastructure affected (e.g. roads or rail links closed).

Critical services affected.

OR if the above criteria are not met:

History of repeated flooding. The frequency of flooding greater than 3 occurrences of internal property flooding within 5 years or similar frequency felt to be significant.

The incident is part of a widespread flood event.

The vulnerable are particularly at risk, such as the elderly, young children, those living with a disability or living in areas of deprivation.

Significant negative impact on the natural environment.

Appendix B: Prioritisation Criteria

Criteria used for GIS analysis to prioritise communities and Devon's Local Flood Risk Management Strategy Action Plan

- Number of properties affected or at high risk in any one community
- Frequency of flooding to that community
- Depth/Severity of flooding experienced or at high risk
- Risk to life (particularly the vulnerable such as the elderly, young children, those living with a disability or in areas of deprivation)
- Impact on, or high risk of disruption to critical infrastructure
- Impact on, or high risk of disruption to businesses and services, especially essential services such as health, education, emergency services
- Impact on, or high risk of impact on the Environment
- Sufficient Cost-Benefit ratio and robust business case.

The specific order of the criteria does not reflect the weighting attached to each. In particular, the risk to life is shown beneath three other criteria, as it is directly influenced by them.

Prioritisation is subject to change as a result of any new data on flooding events.

This is an ongoing assessment and will always consider the most up to date climate change allowances as part of supporting modelling information

Appendix C: Long-term health problem or disability figures for Devon

Below are a few locations within each District area which showed relatively high numbers of those with limited day to day activities as a result of long term illness or disability, from Devon's [long-term health problem or disability](#) figures:

East Devon:

Honiton, Exmouth, Sidmouth, Seaton

Exeter:

Alphington, Priory, Whipton Barton

Mid Devon:

Crediton, Cullompton, Tiverton

North Devon:

Barnstaple, Ilfracombe, Fremington, Braunton

South Hams:

Ivybridge, Kingsbridge, Totnes, Dartmouth

Teignbridge:

Bovey Tracey, Dawlish, Kingsteignton, Teignmouth, Newton Abbot

Torrige:

Bideford, Northam,

West Devon:

Okehampton, Tavistock