

City of London Corporation

Draft Local Flood Risk Management
Strategy

2027 – 2033

June 2026



Executive Summary

A Local Flood Risk Management Strategy is a statutory document which sets out how a local authority will manage flood risk in its area and is required under the Flood and Water Management Act 2010. The City of London Corporation has produced a new Local Flood Risk Management Strategy to replace the previous strategy which was published in 2020. Despite the areas of flood risk in the Square Mile being relatively confined, the likelihood of flooding is increasing due to climate change and the consequences could be significant in terms of disruption to business, inconvenience to occupiers and reputational damage.

Rainfall and flooding do not respect local authority boundaries. Flood risk in the Square Mile is influenced by policies and actions implemented in other areas. The City Corporation is committed to working in partnership with other Lead Local Flood Authorities and Risk Management Authorities to collectively address the flood risks we all face.

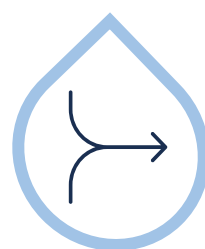
This Local Flood Risk Management Strategy sets out the City Corporation's vision for managing the risk of all sources of flooding in the Square Mile, which will be achieved across the following three ambition areas:



Resilient places



Empowered people



Coordinated delivery

Resilient Places - The 'places' of the Square Mile, including buildings, streets and open spaces, are better prepared for flooding and the City Corporation has the right processes to effectively monitor flood risk and resilience.

Empowered people - Residents, businesses, workers and visitors in the Square Mile are informed, engaged and able to act on building flood resilience and that those involved in an emergency flood response are empowered to fulfil their role and responsibilities.

Coordinated delivery - Strengthen partnerships, improve the use of data and evidence, and embed flood resilience into long term planning and decision making, so that delivery is joined up and effective.

Each of the ambitions have two outcomes that are supported by objectives and key results to facilitate their delivery.

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1. Introduction

Purpose

The [Flood and Water Management Act 2010](#) assigns various responsibilities to Lead Local Flood Authorities. This includes the requirement to develop, maintain, apply and monitor a strategy for local flood risk management in its area every six years. As the unitary authority, the City of London Corporation is the Lead Local Flood Authority (LLFA) for the City of London, also known as the 'Square Mile'.

Local flooding can be defined as flooding from surface water, groundwater, and ordinary watercourses. This Local Flood Risk Management Strategy (LFRMS) identifies the approach that the City Corporation is taking over the next six years to manage the flood risks that affect the Square Mile and the processes by which progress will be monitored.

This LFRMS covers flood risk affecting the Square Mile's geographic area; it does not include flood risks on City Corporation owned or managed land beyond the Square Mile.

London Surface Water Strategy alignment

A LFRMS must be developed in accordance with the Environment Agency's 2020 [National Flood and Coastal Erosion Risk Management Strategy](#). The ambitions of this LFRMS have been selected to align with Flood Ready London's 2025 [London Surface Water Strategy](#).

The London Surface Water Strategy sets out a coordinated and cross boundary approach to managing surface water flood risk in London from 2025 to 2030 through the creation of Surface Water Catchment Partnerships. The City Corporation is part of the Central London Surface Water Catchment Partnership. This partnership should deliver a mixture of 'Capture, Control, Adapt & Respond' solutions to build resilience. 'Capture' solutions aim to capture and retain water where it falls (up to 15mm); 'Control' solutions aim to control and slow the flow of surface water (up to 45mm); and 'Adapt & Respond' solutions aim to minimise the impacts of any rainfall event (up to 75mm) that results in floodwater that is too much to be captured and controlled (see Figure 1).

The ambitions of this LFRMS have been aligned to those of the London wide strategy. The delivery framework (vision, outcomes, objectives and key results) has been tailored to suit the unique context of managing all types of flood risk within the Square Mile. This means that the City Corporation can contribute to the London wide vision of collectively working to address the risk of surface water flooding across the capital whilst still focusing on the specific risks, responsibilities and opportunities that exist within the Square Mile.



Figure 1 – Capture, Control, Adapt & Respond pathway (taken from Figure 14 of the London Surface Water Strategy)

Local context

The Square Mile is located on the north bank of the River Thames within Greater London (see Figure 2). It is the historic heart of London and was established on higher ground than its neighbouring boroughs, which provides flood protection from the River Thames.

The Square Mile has an area of approximately 2.9 km² and borders the boroughs of Camden, Islington, Hackney, Tower Hamlets and the City of Westminster. It also borders Southwark and Lambeth on the south side of the River Thames, through the bridgeheads of London and Blackfriars Bridges.

As well as the River Thames, at least two historical watercourses flow through the Square Mile: the River Fleet and the River Walbrook. These two watercourses join the River Thames within the Square Mile boundary; however, they now form part of the sewer network.

The Square Mile is heavily urbanised with commercial buildings and infrastructure. It is home to approximately 8,600 residents and a work-day population of over 600,000, as well as millions of domestic and international visitors each year. The Square Mile is one of the main financial districts in the world. Many historic landmarks and buildings are located in the Square Mile,

including St Paul's Cathedral and the Mansion House. There are small areas of open space – primarily private and public gardens and churchyards.

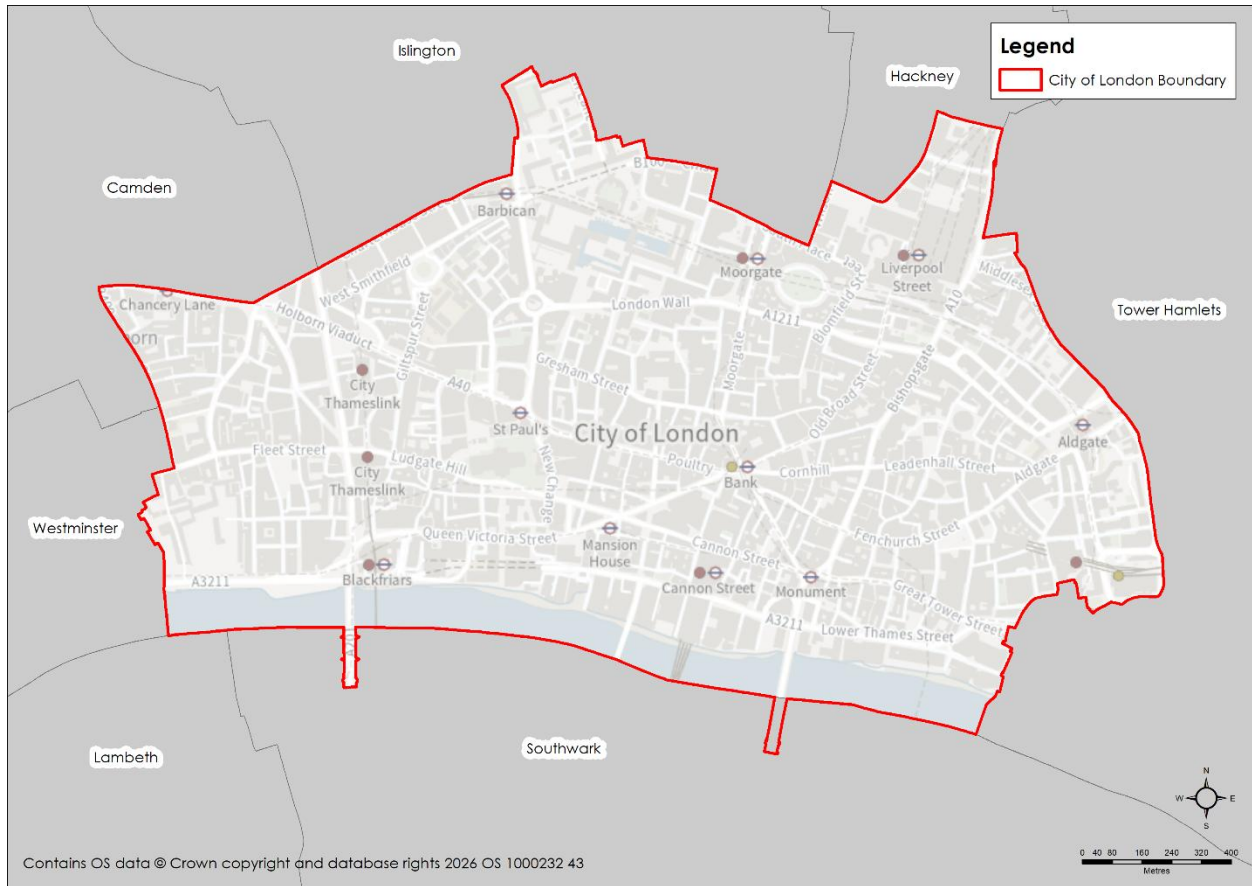


Figure 2 – Square Mile location

Successes from previous strategy (2020-2027)

The delivery period for City Corporation's previous [LFRMS](#) ran from 2020 – 2027. Successes from the 2020-2027 LFRMS are outlined below.

- ✓ Delivered multiple Sustainable Drainage Systems (SuDS) schemes across the Square Mile's public realm including Finsbury Circus, Bread Street, Little Trinity Lane, St Andrews Undershafft and Knightrider Court. All of the City Corporation's SuDS schemes in the Square Mile are available to view on the Greater London Authority's [Retrofit SuDS Map](#).
- ✓ Published the first [Riverside Strategy](#) which establishes how the City Corporation will secure flood protection along our stretch of the River Thames as part of the [Thames Estuary 2100](#) (TE2100) Plan.
- ✓ Maximised the contributions from development for reducing flood risk through the provision of SuDS in accordance with guidance and policies

in the [City Plan 2040](#) and [Planning for Sustainability Supplementary Planning Document](#).

- ✓ Published the Strategic Flood Risk Assessment 2023 (SFRA) which forms the evidence base for the new City Plan 2040.
- ✓ Reviewed and updated the City Corporation's Multi Agency Flood Plan (MAFP).
- ✓ Published new community flood resources for Square Mile [workers](#), [building owners](#) and [businesses](#).
- ✓ Created a flood resistance and resilience case study guide for commercial and historic buildings.
- ✓ Published online asset register map.
- ✓ Collaborated with the Town Clerk's Resilience Team in their capacity as Chair of the City of London's Borough Resilience Forum to deliver a winter flood awareness campaign. This included a four-part flood resilience [webinar series](#).
- ✓ Continued to engage with regional networks for sharing of knowledge and best practice, including the Central London North Flood Risk Partnership Group, the London Drainage Engineers Group and the Central London Surface Water Catchment Partnership.

How this strategy was developed

Stakeholder engagement was a key part of developing this LFRMS to capture local knowledge of flood risks and understand the levers and aspirations for flood risk management in order to develop the delivery framework.

LFRMS stakeholders [TBC depending on formal consultation]

Stakeholders that could affect or be affected by this LFRMS can be grouped as follows:

- **City Corporation internal service directorates and teams** - Environmental Resilience, Resilient Buildings, Highways, Planning, Planning Policy, Emergency Planning, Public Realm, Transport, City Gardens, Engineers, Responsible Procurement, Insurance, Corporate Strategy and Risk, City Bridge Foundation, City of London Schools.
- **Elected members**
- **Risk Management Authorities (RMAs)** - Environment Agency, Thames Water and Transport for London (TfL)

- **Other organisations** – Greater London Authority, Port of London Authority, London Councils, Network Rail, London Fire Brigade, Royal Parks, Historic England and Natural England
- **London Boroughs in our flood risk partnerships** - Westminster, Camden, Islington, Tower Hamlets, Kensington and Chelsea, Hammersmith and Fulham, Brent, Ealing, Hackney, Haringey
- **Square Mile community groups, residents and businesses**

Pre-consultation workshops

Prior to the formal consultation period, two strategy development workshops were held in March 2026 with key internal and external stakeholders. The aim of these workshops was to offer an early opportunity for shaping the overall vision of the LFRMS, considering what successful outcomes could look like and what would need to be done to achieve them. This fed into the drafting of the ambitions, outcomes and objectives.

Public consultation

A public consultation period for the draft LFRMS was conducted from X to X. Further details on the public consultation period and feedback received can be found in Chapter 5 'How engagement has shaped this strategy'.

2. Flood risk management strategy requirements

The Flood and Water Management Act 2010 specifies the Lead Local Flood Authority's duties regarding Local Flood Risk Management Strategies and outlines the elements that must be included in a Local Flood Risk Management Strategy. Table 1 shows these requirements and where each one is covered in the City of London Local Flood Risk Management Strategy 2027.

Table 1: Flood and Water Management Act

| The Flood and Water Management Act 2010 section 9 (4) requires that the strategy must specify: | Where it is covered in this strategy |
|---|---|
| (a) the risk management authorities in the authority's area, | Appendix B |
| (b) the flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area, | Appendix B |
| (c) the objectives for managing local flood risk (including any objectives included in the authority's | Chapter 4 |

| | |
|--|-----------|
| flood risk management plan prepared in accordance with the Flood Risk Regulations 2009), | |
| (d) the measures proposed to achieve those objectives, | Chapter 4 |
| (e) how and when the measures are expected to be implemented, | Chapter 4 |
| (f) the costs and benefits of those measures, and how they are to be paid for, | Chapter 6 |
| (g) the assessment of local flood risk for the purpose of the strategy, | Chapter 3 |
| (h) how and when the strategy is to be reviewed, and | Chapter 7 |
| (i) how the strategy contributes to the achievement of wider environmental objectives. | Chapter 8 |

3. Flood risk in the City of London

Flood risk is a combination of the probability and the potential consequences of flooding. The Square Mile is at relatively low risk of flooding with specific areas at some risk from river and tidal flooding and surface water / sewer flooding. Despite the area of flood risk being relatively confined, the consequences of flooding occurring could be significant in terms of disruption to business, inconvenience to occupiers and reputational damage. Further detail on the sources of flood risk in the Square Mile can be found in the City Corporation's [2023 Strategic Flood Risk Assessment](#) (SFRA).

River and tidal flood risk

Limited areas of the Square Mile are at risk from the tidally influenced River Thames in the absence of the current flood defences (see Figure 3). Environment Agency breach modelling shows that the residual risk from a breach or overtopping of defences is confined to the riverside south of Upper and Lower Thames Street (A3211) and the Inner and Middle Temple (see Figure 4).

The Thames Barrier and local flood defence walls protect the Square Mile, but changes will be needed to address sea level rise associated with climate change and aging infrastructure. The TE2100 Plan identifies the need to raise flood defences in central London by up to 0.5 m by 2050 and by up to 1m by 2090 to provide increased protection up to a 1 in 10,000 year event (0.01% chance of occurrence in any given year).

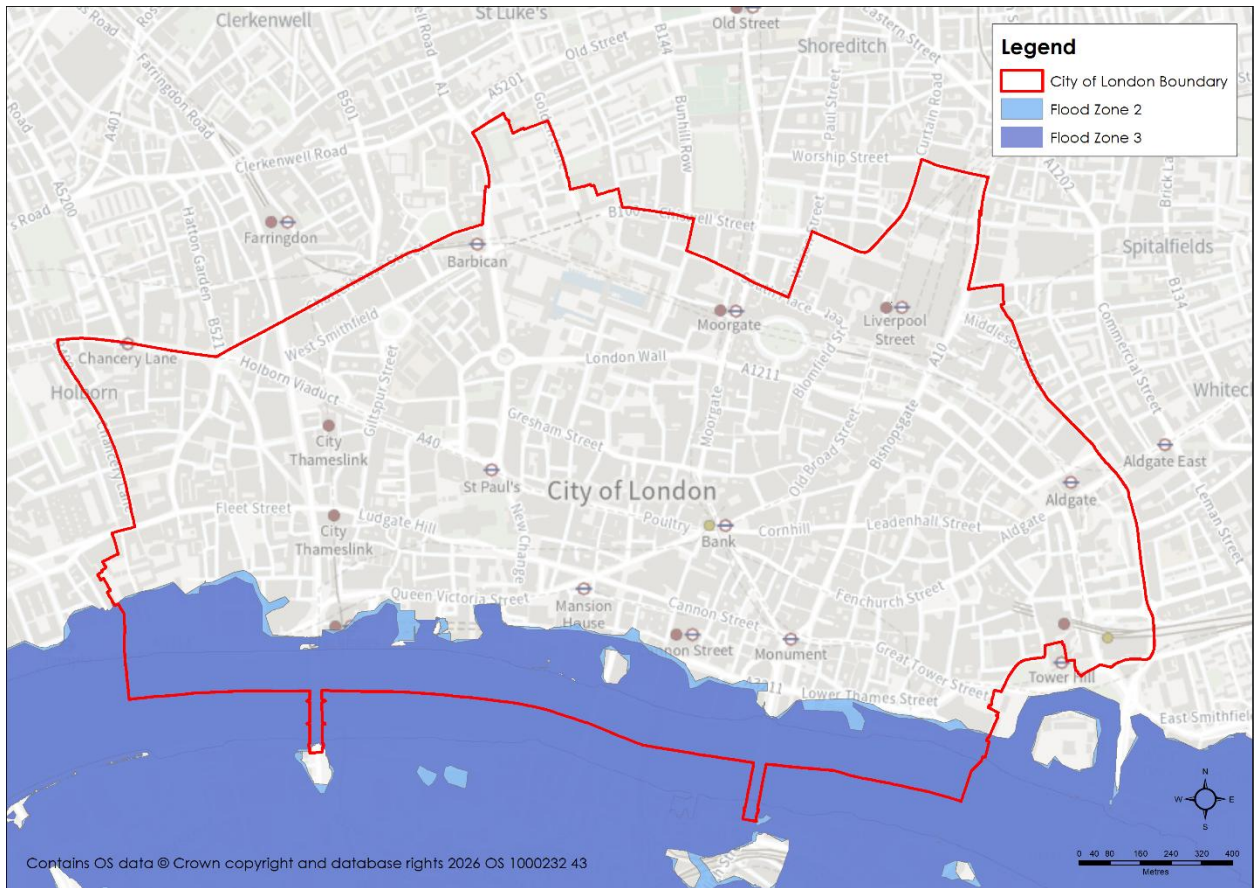


Figure 3 – Extents of Flood Zones 2 and 3 in the Square Mile

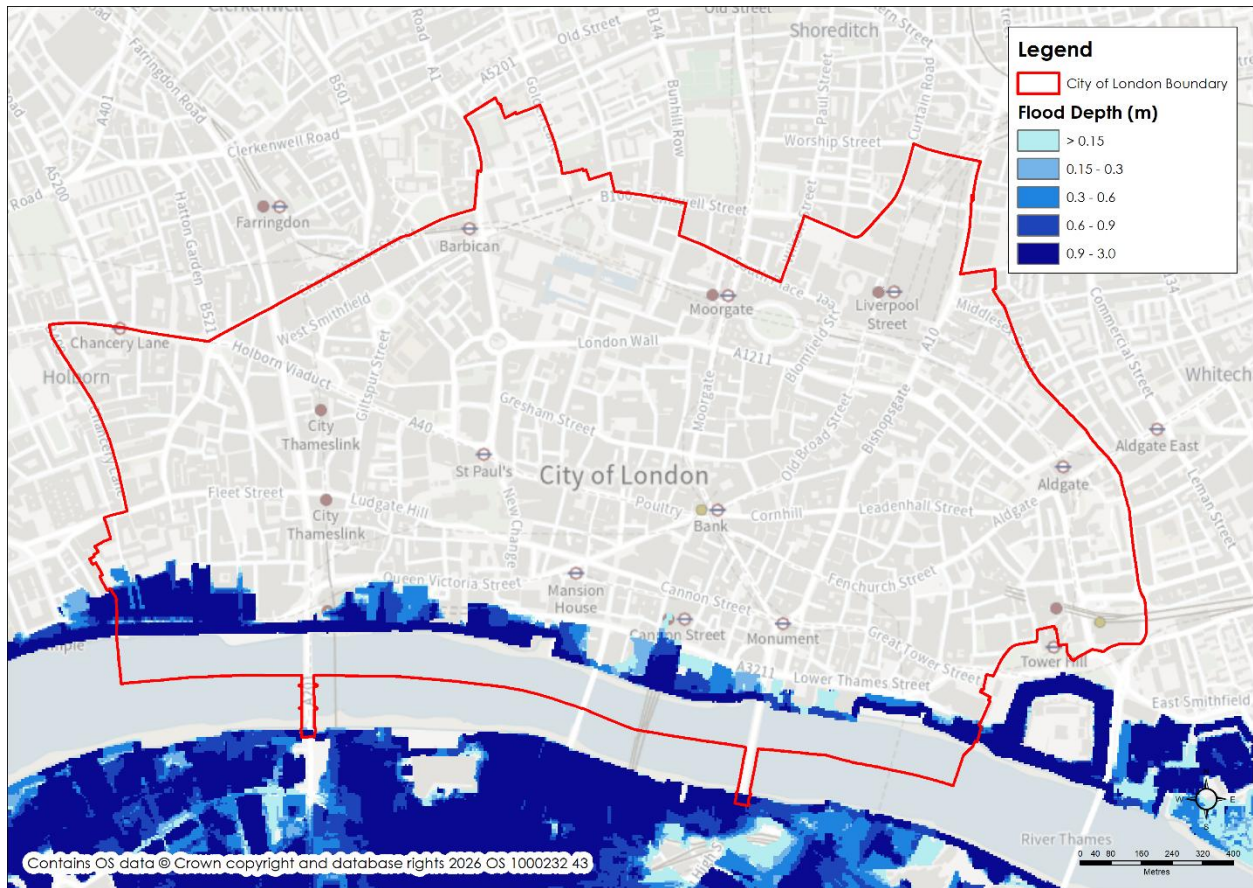


Figure 4 – Flood extents of the Thames Tidal Breach Model

Surface water and sewer flood risk

Due to the interconnected nature of the combined sewer system in the Square Mile, there is a direct link between surface water and sewer flooding. The built-up nature of the Square Mile and its limited natural drainage capacity means that surface water and sewer flooding are the most likely causes of flooding. During heavy rainfall, the available capacity of the combined sewer system can be exceeded. This can lead to surcharging from manholes and gullies at street level, or into properties through sewer connections or combined sewer overflows into the River Thames. In July 2021, two extreme storms occurred in London in which two months of rainfall fell within two hours. These events resulted in extensive surface water flooding and caused an [estimated insurance loss of at least £281 million](#).

The main and local combined sewers in the Square Mile receive flows from Westminster, Kensington and Chelsea, Hammersmith and Fulham, Camden and Islington. Due to the large upstream sewer catchment, works within the named boroughs which alter the rate by which surface water reaches the sewer system could impact the risk of sewer flooding in the Square Mile.

Figure 5 shows that the risk of flooding from surface water and sewer overflow in the Square Mile is confined to restricted areas including the former Fleet Valley at Farringdon Street and the River Thames riverside.

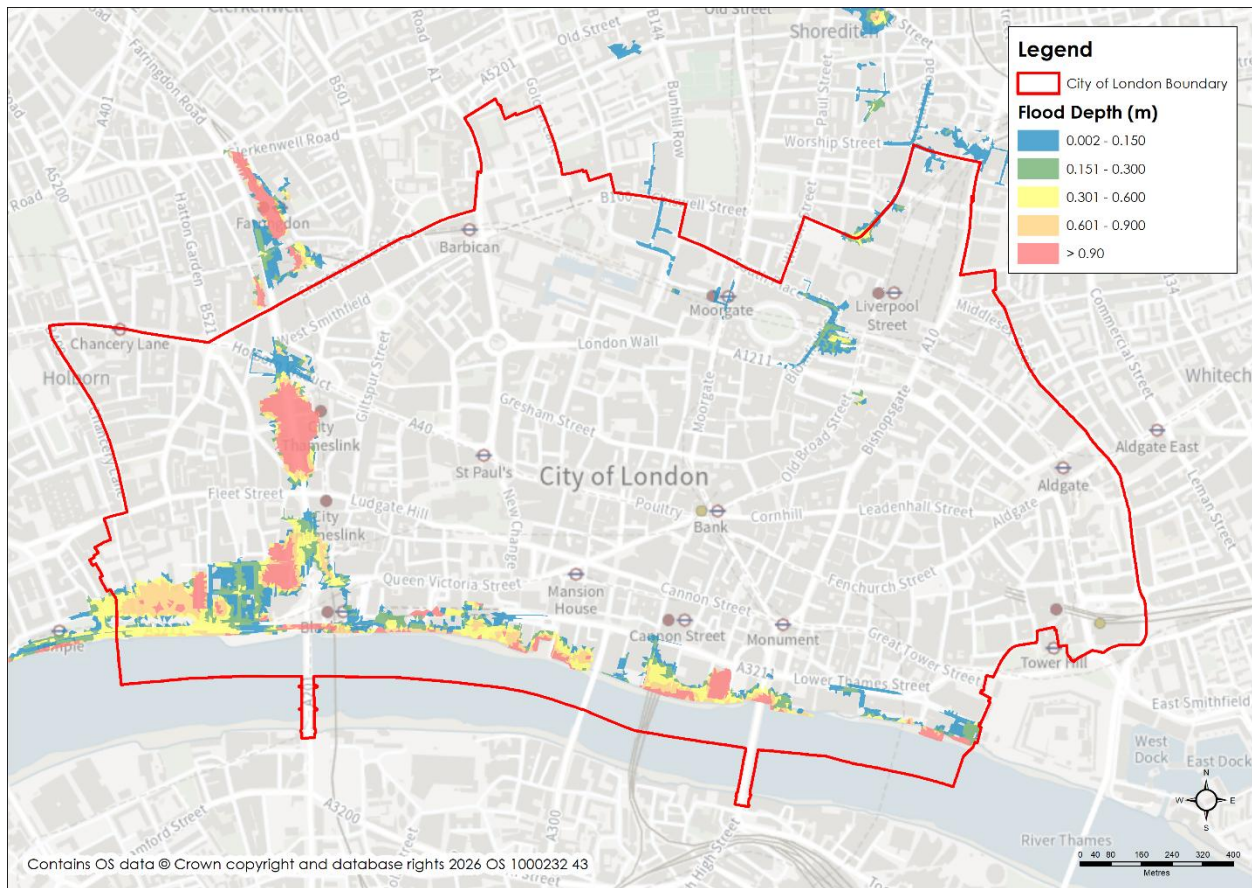


Figure 5 - Surface water flooding and sewer overflow extents

Groundwater flood risk

The Square Mile is protected from groundwater flooding in the deep chalk aquifer by the General Aquifer Research Development and Investigation programme, which maintains groundwater levels at -30 to -50 m Above Ordnance Datum. Some areas within the Square Mile have increased potential for elevated groundwater from the shallow aquifer which comprises sand and gravel which have a high porosity and permeability (Figure 5).

It is difficult to predict groundwater risk due to complex interactions between rainfall infiltration, basement barriers and the predominance of impermeable surfaces in the Square Mile. Groundwater flood risk is not expected to increase in the short to medium term. However, climate change is likely to increase groundwater flood risk due to higher rainfall. Increased leakage from drains and sewers infiltrating into the ground and changes to surface impermeability (i.e. more infiltration SuDS) could further contribute. Sea level rise will increase the

water level within the River Thames which will also increase groundwater levels, though this influence decreases as distance from the riverside increase.

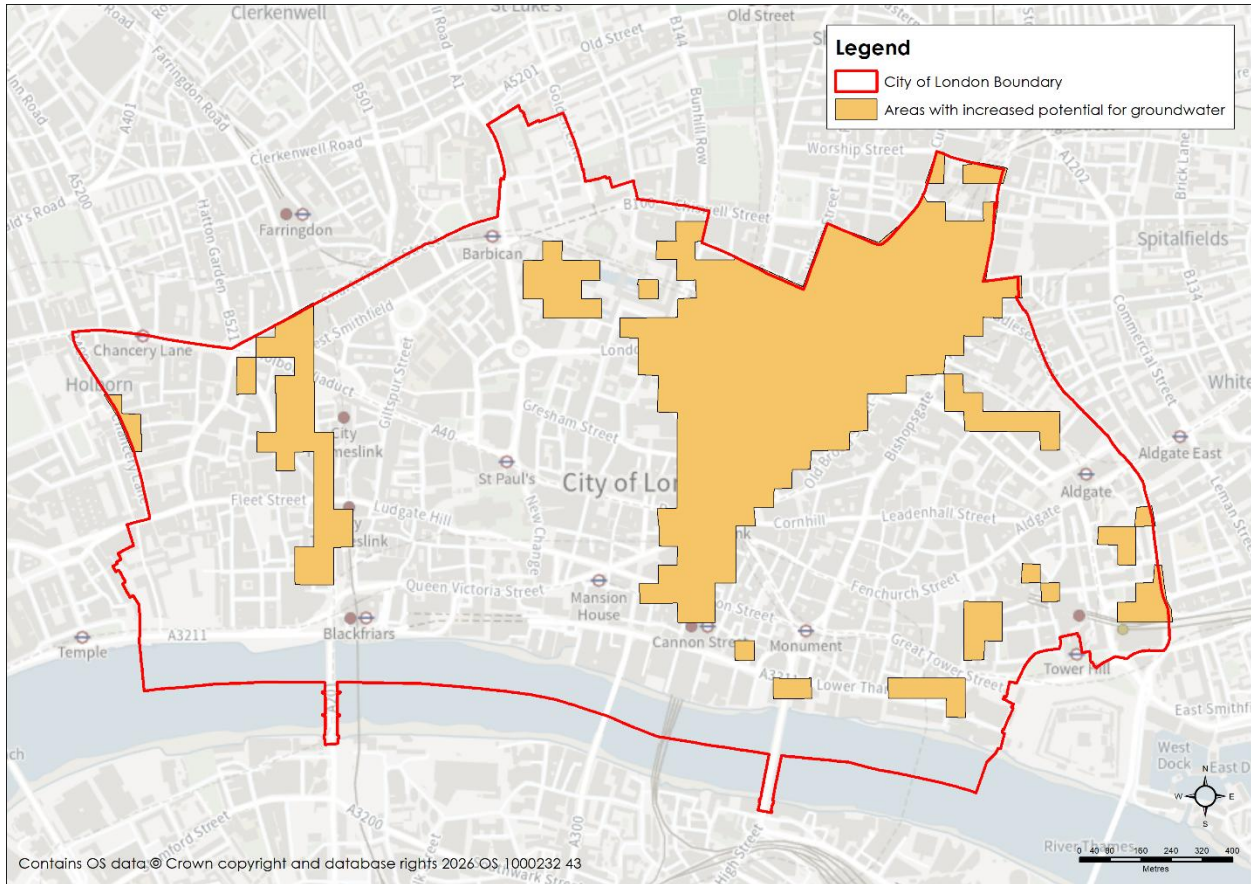


Figure 5 - Areas with increased potential for elevated groundwater

Climate change and flood risk

Our climate is changing and will continue to change for many decades to come. The projected impacts are hotter drier summers, warmer wetter winters, more extreme weather events and sea level rise.

Current guidance from the Environment Agency suggests that rainfall intensity is likely to increase by between 20% and 40% over the next 100 years. Increased rainfall intensity will impact the ability of the combined sewer network to effectively capture and convey surface water flows.

The frequency of severe droughts is likely to increase as a result of climate change, which can exacerbate the risk of surface water flooding where very dry ground cannot absorb rainfall resulting in increased runoff. Similarly ground movement and subsidence will damage drainage infrastructure.

Sea level is predicted to rise with consequential increases in flood risk from the tidally influenced River Thames. The TE2100 Plan identifies the need and

potential options for upgrading or replacing the Thames barrier and river wall defences over the next century.

4. How we're planning to manage flood risk for 2027 – 2033

This chapter outlines the LFRMS' framework for reducing the risk and impact of flooding in the Square Mile. The framework aligns with the ambitions of the London Surface Water Strategy but has a tailored vision, outcomes and objectives to suit the unique context of managing flood risk within the Square Mile.

Our definitions

Table 2 below summarises how we are defining each of the elements which make up the Local Flood risk Management Strategy's framework.

Table 2: Framework elements definitions

| Element | Our definition |
|-------------|---|
| Vision | Describes the future we are working towards |
| Ambitions | The big changes we want to achieve |
| Outcomes | Tangible results that show benefits for the people, communities and environments of the Square Mile |
| Objectives | Break down outcomes into clear action areas, measured by key results |
| Key results | Specific, measurable and timebound targets that track the LFRMS' progress. |

Our vision

"Increasing the Square Mile's resilience to flooding, through taking action with others that benefits people, places and the environment"

Ambitions, outcomes and objectives summary

Figure 6 provides an overview of how all the elements fit together to work towards achieving our vision. The final three sections of this chapter provide more detail on how we'll deliver the desired change for each of the ambitions through their associated outcomes, objectives and key results.

Vision

Ambitions

Outcomes

Objectives

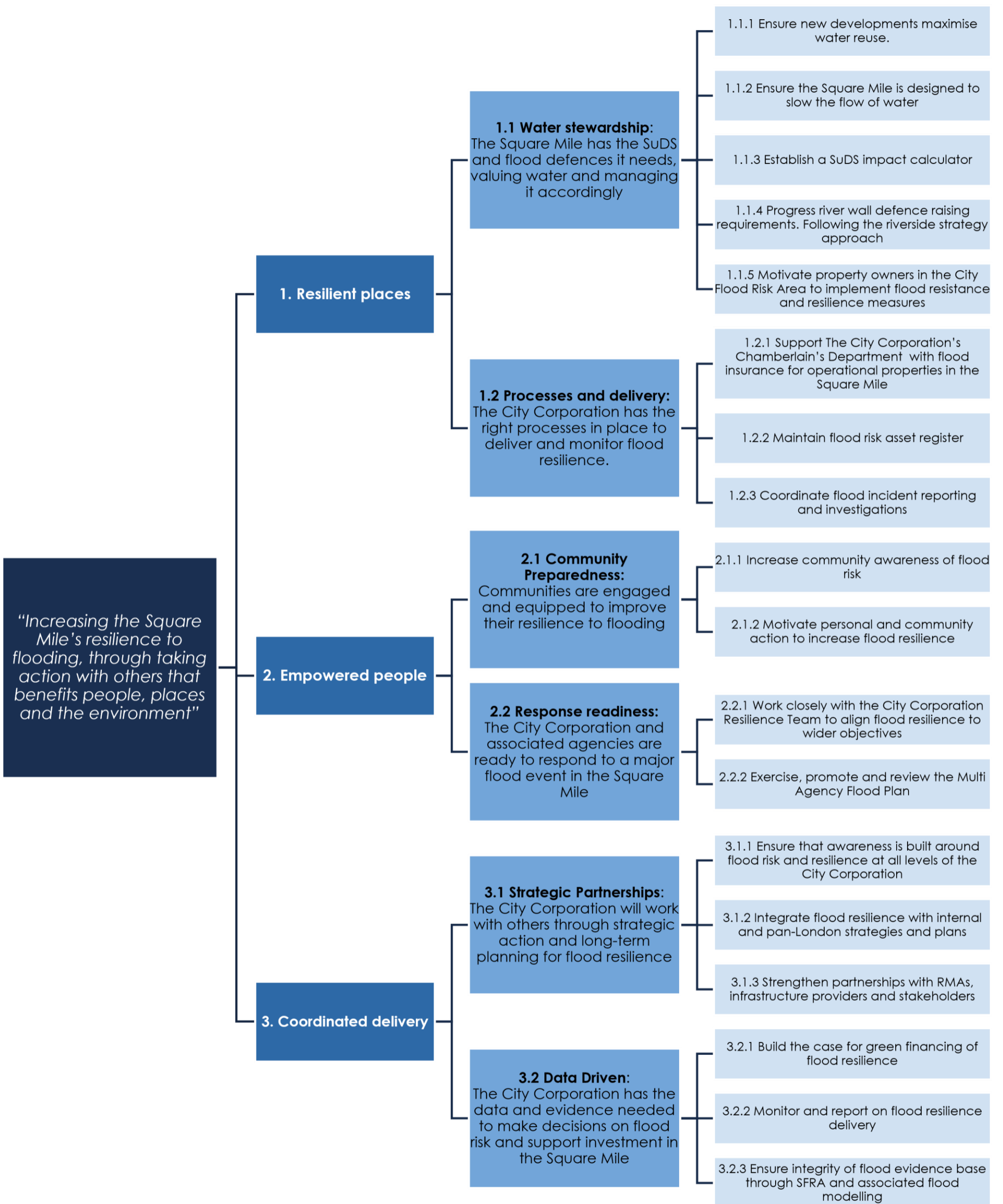


Figure 6 - Vision, ambitions, outcomes and objectives framework

Ambition 1 - Resilient places

The 'places' of the Square Mile, including buildings, streets and open spaces, are better prepared for flooding and the City Corporation has the right processes to effectively monitor flood risk and resilience.

Why do we need this?

Our ambition of resilient places reflects the growing need to adapt the Square Mile's built environment to increasing flood risk driven by the impacts of climate change. While the level of flood risk in the Square Mile is relatively low, changes in rainfall patterns and rising sea levels mean that existing flood defence and sewerage infrastructure will come under increasing pressure over the lifetime of this LFRMS.

The Square Mile is very built up, with lots of hard surfaces and limited space for rain to drain naturally. This puts strain on the combined sewer system as it does not have sufficient capacity to cope with heavy rainfall events. Surface water and sewer flooding are already the most likely types of flooding in the Square Mile, particularly in areas around Farringdon Street and New Bridge Street, and along the riverside. Climate change is expected to increase the frequency and intensity of rainfall, worsening this over time.

Sea level rise is also increasing the risk of fluvial/tidal flooding from the River Thames in the area between the riverside and Thames Street. Although the Thames Barrier and existing riverside walls currently offer a high level of protection, these flood defences will need to be raised in the future to maintain this standard. Much of the riverside is privately owned, so it is important that flood defence raising plans are considered into development and management plans as early as possible.

Alongside physical interventions, the City Corporation as the LLFA for the Square Mile needs the right processes in place to overcome administrative challenges around flood asset and incident reporting.

A small flood incident in the Square Mile could have a major impact. The City is a global financial centre with critical infrastructure, historic buildings, a large daytime workforce and millions of visitors each year. Flooding can disrupt businesses, damage important assets, affect public safety and harm the Square Mile's reputation.

Outcome 1.1 Water stewardship

The Square Mile has the SuDS and flood defences it needs, valuing water and managing it accordingly.

What are we aiming to achieve?

Rainfall is a valuable resource and should be managed accordingly. We need to make better use of our buildings, streets and open spaces to slow, store and reuse the water that falls on them. This can be achieved through the delivery of SuDS which specifically maximise water reuse. Riverside flood defence raising can be achieved through working with developers, landowners and the Environment Agency to follow the Riverside Strategy. There are approximately 242 properties located in the City Flood Risk Area which can become better prepared for flooding through the implementation of flood resistance and resilience measures as part of new development or routine maintenance.

How we'll do this:

Objective 1.1.1

Ensure new developments maximise water reuse.

Key results:

- 100% of all major planning applications will consider water reuse in their drainage strategy.
- 50% of all major planning application will incorporate rainwater or greywater harvesting as part of their proposed development annually.

Objective 1.1.2

Ensure the Square Mile is designed to slow the flow of rainwater.

Key results:

- Each year, an additional 1% of the Square Mile's area will be covered by SuDS where there were none previously (including from development and public realm).
- 100% of all public realm designs consider the integration of SuDS where appropriate.
- By 2033, pilot three alternative irrigation sources for Square Mile open spaces.
- Reduce potable water use for irrigation by 5% annually, achieving a 30% reduction by 2033.

Objective 1.1.3

Establish a SuDS impact calculator tool.

Key results:

- By 2030, create a SuDS impact tool and a suite of case studies.
- Achieve a minimum of 80% of tool users reporting positive feedback on the tool.

Objective 1.1.4

Progress river wall defence raising requirements, following the Riverside Strategy approach.

Key results:

- 100% of major planning applications granted along the riverside will have plans in place for future defence raising where appropriate.
- 70% of major planning applications granted along the riverside will provide raising to the 2050 level as part of the development where appropriate.

Objective 1.1.5

Motivate property owners in the City Flood Risk Area to implement flood resistance and resilience measures.

Key results:

- By 2033, create and promote tailored guidance for commercial and residential building owners and City workers.
- Directly engage with at least 10 properties in the City Flood risk Area annually, achieving a minimum of 80% positive feedback and improved awareness.
- 50% of direct engagements result in the implementation of flood resistance and resilience measures.

Outcome 1.2 **Processes and delivery**

The City Corporation has the right processes in place to deliver and monitor flood resilience.

What are we aiming to achieve?

As the LLFA for the Square Mile, the City Corporation needs to have the right processes and procedures in place to manage flood risk effectively. We will achieve this through our statutory duty to maintain a register of flood risk assets, ensuring City Corporation owned buildings in the Square Mile have flood insurance and responding clearly and consistently to reports of flooding.

How we'll do this:

Objective 1.2.1

Support City Corporation's Chamberlains department with flood insurance for operational properties in the Square Mile.

Key results:

- Annually verify that 100% of operational properties in the Square Mile owned by the City Corporation are able to get flood insurance.

Objective 1.2.2

Maintain the flood risk asset register

Key results:

- Publish annual statement of flood risk asset register every November, with commentary on the condition of assets.

Objective 1.2.3

Coordinate flood incident reporting and investigations.

Key results:

- Acknowledge all reported incidents of flooding within 5 working days.
- Deliver 100% of Section 19 investigations within required timeframes.

Ambition 2 - Empowered people

Residents, businesses, workers and visitors in the Square Mile are informed, engaged and able to act on building flood resilience and that those involved in an emergency flood response are empowered to fulfil their role and responsibilities.

Why do we need this?

The Square Mile has a very different community profile to other London boroughs. There are around 8,600 people who live in the Square Mile however around 678,000 people make up its working population and it welcomes millions of domestic and international visitors each year. The transient worker and visitor populations means that many people who spend time in the Square Mile may be unfamiliar with whether an area or building they use on a daily basis is at risk from flooding.

Residents, businesses, workers, visitors need to understand the flood risks they face and know what actions to take before, during and after a flood incident. Knowledge and awareness building are vital, through the provision of clear and accessible information that helps people to make informed decisions about protecting themselves and their properties.

Working with communities also builds a shared responsibility. When people feel informed and involved, they are more likely to share knowledge and take action within their organisations and networks. Given the Square Mile's role as global centre of business, these benefits can extend well beyond the City's boundary.

In addition, effective flood response depends on well-prepared organisations. The City Corporation has a Multi Agency Flood Plan (MAFP), which sets out a coordinated response and recovery phase if a severe flood event were to occur in the Square Mile. We need all those involved in this response to be empowered to fulfil their roles to minimise the risk to people, property and critical services.

Outcome 2.1 **Community preparedness**

Communities are engaged and equipped to improve their resilience to flooding.

What are we aiming to achieve?

We want people who live, work and spend time in the Square Mile to be aware, informed and resilient when it comes to flood risk. We can achieve this by making flood risk information clear and relevant, recognising that different communities will need different methods and materials for engagement.

The City Corporation will support people to better understand the flood risks they may face, where to find weather warnings and alerts and what practical actions that can be taken before, during and after a flood event occurs.

How we'll do this:

Objective 2.1.1

Increase community awareness of flood risk.

Key results:

- Annually deliver a seasonal awareness campaign with at least two supporting engagement events.
- Achieve a minimum of 80% of participants reporting positive feedback and improved awareness
- Ensure at least 50% of community members engaged through our events have / are signed up to the Environment Agency and Met Office alerts annually.

Objective 2.1.2

Motivate personal and community action to increase flood resilience

Key results:

- Annually publish one case study demonstrating behaviour change as a result campaign attendance and learning.

Outcome 2.2 **Response readiness**

The City Corporation, Risk Management Authorities and other flood risk partners are engaged and equipped to improve their preparation for, response to and recovery from flooding.

What are we aiming to achieve?

Effective management of flood risks across the Square Mile requires coordination between different organisations with clearly defined roles and responsibilities. We will ensure that the City Corporation, Risk Management Authorities and other flood risk partners are prepared to respond if a severe flood event were to occur in the Square Mile by exercising, promoting and reviewing MAFP framework.

How we'll do this:

Objective 2.2.1

Work closely with the City Corporation Resilience Team to align flood resilience to wider objectives.

Key results:

- Hold quarterly team meetings to coordinate messaging and engagement and improved awareness.
- Annually collaborate on flood resilience impact briefing, highlighting new actions or lessons learnt.

Objective 2.2.2

Exercise, promote and review the Multi Agency Flood Plan (MAFP).

Key results:

- Exercise the MAFP every two years or whenever there is a major revision.
- Annually issue MAFP responder refresher briefing every October.

Ambition 3 - Coordinated delivery

Our aim is to strengthen partnerships, improve the use of data and evidence and embed flood resilience into long term planning and decision making, so that delivery is joined up and effective.

Why do we need this?

Flood risk in the Square Mile cannot be managed by a single organisation. Water does not observe political, administrative or community boundaries therefore effective flood resilience relies on many actors working together in a coordinated way.

A key part of this coordination is collecting, sharing and using data and information. Good evidence helps us to make informed decisions, target investment and track whether the actions we take are working effectively. We need a shared and reliable flood risk evidence base to guide the prioritisation of action and demonstrate the benefit of flood resilience measures.

In line with the London Surface Water Strategy, we need to play our part in taking a catchment scale approach by working with other LLFAs and flood risk partners to manage cross boundary flood risk. Coordination is also needed to ensure flood resilience is built into wider local, regional and national strategies. This will maximise the impact of actions and deliver wider benefits such as climate adaptation and increased biodiversity.

What are we aiming to achieve?

Outcome 3.1 Strategic partnerships

The City Corporation will work with others through strategic action and long-term planning for flood resilience.

We will maintain and strengthen relationships with partners and ensure that flood risk remains visible at strategic level. An informed leadership team and aligned priorities are essential for delivering this LFRMS. We will work with internal teams, senior leadership and external partners to coordinate planning and action on flood resilience.

How will we do this?

Objective 3.1.1

Ensure that awareness is built around flood risk and resilience at all levels of the City Corporation.

Key results:

- Facilitate four flood risk steering groups annually.
- Deliver at least one flood risk and resilience upskilling session to the Corporate Risk team and/or all staff.

Objective 3.1.2

Integrate flood resilience within internal and pan-London strategies and plans.

Key results:

- Review internal and external strategies on a quarterly basis for opportunities to integrate flood resilience.

Objective 3.1.3

Strengthen partnerships with RMAs, infrastructure providers and stakeholders.

Key results:

- Annually attend at least ten flood partnership meetings.

Outcome 3.2 **Data driven**

We have the data and evidence we need to make decisions on flood risk and support investment in the Square Mile.

What are we aiming to achieve?

We will build and maintain a strong evidence base to support flood risk management and investment. Reliable data and clear evidence are not only essential for understanding flood risk but also for demonstrating the value of taking action to attract investment.

The unique positioning of the City Corporation means that it is well placed to explore innovative approaches to funding flood resilience and engage with potential public and private investors in order to unlock opportunities for investment. We will also ensure that the integrity of our flood evidence base is maintained through ongoing monitoring and annually reporting on this LFRMS and the SFRA. This will support informed decisions and help to position flood resilience as a valuable and investable priority in the Square Mile.

How will we do this?

Objective 3.2.1

Build the case for green financing of flood resilience.

Key results:

- By 2030, deliver a research project and internal engagement sessions on green finance for flood resilience. Aiming to achieve a minimum of 80% positive feedback and improved awareness from participants.

Objective 3.2.2

Monitor and report on flood resilience delivery.

Key results:

- Annually publish a review of the LFRMS in March and SFRA in December.

Objective 3.2.3

Ensure integrity of flood evidence base through the SFRA and associated flood modelling.

Key results:

- By at least 2028, we will have published an updated SFRA.
- Capture 100% of SuDS details from major development applications and provide annual update on both proposed and completed developments.

5. How engagement has shaped this strategy

Our engagement process

Prior to the consultation period, two strategy development workshops were held in March 2026 with key internal and external stakeholders. The aim of these workshops was to offer an early opportunity for shaping the overall vision of the LFRMS and considering what successful outcomes could look like and what would need to be done to achieve them, which fed into the drafting of the ambitions, outcomes and objectives.

A formal consultation period for the draft LFRMS was carried out from X 2026 to X 2026. During this period, the draft LFRMS and appendices were published on the City Corporation's flood risk webpages, and the consultation was promoted directly to key stakeholders as well as through a number of communication channels.

Feedback provided in the consultation has been addressed and incorporated into the final LFRMS. We've summarised our response to some of the comments in the 'You said, we did' section below.

You said, we did

[Will be completed post consultation period]

6. Resources, funding and benefits of delivery

Resources

As the LLFA, the City Corporation is responsible for the coordination and cooperation with other RMAs to address flood risk in the Square Mile and will use existing resources to fulfil many of the objectives for delivering the LFRMS. The lead team for implementing the LFRMS is the Environmental Resilience Team.

Thames Water Utilities Limited is responsible for the sewerage infrastructure and the prevention of sewer flooding. As part of their responsibility for managing sewer flood risk, Thames Water Utilities Limited have developed a 25 year [Drainage and Wastewater Management Plan](#) to reduce pressures on their service.

Utility companies and property owners are responsible for site specific flood alleviation, resistance and resilience of their premises. Where premises will benefit from wider flood alleviation schemes, property owners will be encouraged to provide a contribution towards such schemes.

Square Mile developers are responsible for ensuring that flood risks are addressed in building design and associated landscaping.

Funding

There are many internal and external sources of funding that can be accessed to deliver flood resilience within the Square Mile.

Internal:

- **Service area revenue and capital budgets** – Some of the LFRMS delivery will require Officer time to implement, other aspects will be delivered through the City Corporation's capital works programme.
- **LLFA grant** – The City Corporation receives a grant from central government to implement the statutory duties of the LLFA role.
- **Climate Action Strategy** – The City Corporation has invested £15 million to prepare the Square Mile for extreme weather events from 2020 – 2027.
- **Section 106 Agreements** - New developments may be required to contribute towards specific projects due to specific obligations based on planning policies.
- **Community Infrastructure Levy (CIL)** – A charge on new development that is used to help fund the provision of infrastructure in the Square Mile.

External:

- **FCERM Grant in Aid (GiA)** – Provided by DEFRA for use in financing some or all stages of a flood alleviation project. Projects must contribute to reducing the probability of a flood whilst demonstrating a sufficient benefit-cost ratio.
- **Local levy** – Available for the City Corporation to request through the Thames Regional Flood and Coastal Committee for the development and implementation of flood risk management projects.
- **Third party / partnership funding** – This could come from charity organisations, landowners or key partners such as Thames Water, the Greater London Authority and Transport for London or the London Surface Water Strategy.
- **Private Beneficiary Funding** – Private companies and ‘beneficiaries’ of flood resilience schemes – whose land or property would be better protected as a result of a scheme – may be able to contribute some funding. Support could come through sponsorship, financial contributions or employee volunteering.

Benefits

The implementation of the LFRMS will contribute to ensuring that the Square Mile remains at low risk from flooding and is able to prepare for, respond to and recover from any flood incidents that do occur, benefitting people, places and the environment.

Delivering on our ambitions for this LFRMS will also create benefits further afield than just the Square Mile:

Resilient places:

- **Reduce upstream and downstream flood risk** through flood defence maintenance. Downstream surface water and sewer flood risk in Tower Hamlets will be reduced by slowing, storing and managing surface water in SuDS.
- **Protect critical regional infrastructure**, including transport corridors and utility networks that serve a far wider population than just the Square Mile.

Empowered people:

- **Raising flood risk awareness beyond our boundary** as businesses, institutions, workers and visitors take flood resilience learnings back to homes, workplaces and other boroughs.

- **Enhancing community preparedness for other emergencies** as flood response planning and engagement supports a broader awareness of emergency response and business continuity.

Coordinated delivery:

- **Taking a multi-agency partnership approach** is crucial to align efforts and make strategic decisions, and allocate funding and resources to projects efficiently.
- **Sharing best practice**, providing learning, data and guidance that could be applicable to other boroughs' LFRMS.

7. Strategy monitoring & review

Governance

As detailed in Chapter 5, the draft LFRMS was subject to public consultation in Summer 2026 in line with the requirements of the Flood and Water Management Act 2010. The LFRMS was adopted by the Planning and Transportation Committee on X Month 2026.

The implementation progress of the LFRMS will be overseen by the officer led Flood Risk Steering Group. The Flood Risk Steering Group is chaired by the City Corporation's District Surveyor and includes representatives from Environment, City Surveyors and Town Clerks departments.

Monitoring

The LLFA will be responsible for monitoring and reviewing the progress of the LFRMS as outlined in this document. Progress will be reported on an annual basis.

Review

The LFRMS will be reviewed by the Planning and Transportation Committee every six years in accordance with the Flood and Water Management Act 2010, with the next review due in 2033.

8. Wider environmental benefits

Strategic Environmental Assessment and Habitat Regulation Assessment

A Strategic Environmental Assessment and Habitat Regulations Assessment screening have also been carried out to support the LFRMS and ensure its implementation would not significantly impact the environment or significantly harm a designated feature of a recognised protected European site.

The Strategic Environmental Assessment screening report is provided in Appendix C and the Habitat Regulation Assessment screening report is provided in Appendix D.

Wider environmental benefits

The delivery of this LFRMS will also contribute to achieving wider environmental benefits within the Square Mile. The below summarises some of these benefits and how they link to other City Corporation environmental strategies and plans.

Addressing climate challenges

The LFRMS directly contributes to the City Corporation's [Climate Action Strategy](#), which was published in 2020. The Climate Action Strategy sets out how the City Corporation and Square Mile will achieve net zero, build climate resilience and champion sustainable growth. The LFRMS will also support the [City Plan 2040](#)'s Climate Resilience Policies CR1, CR2, CR3 and CR4. By planning for more intense rainfall events and sea level rise, the LFRMS will help to build resilience in the Square Mile's buildings, public spaces and infrastructure. By managing rainfall as a valuable resource through a water stewardship approach which maximises SuDS and water use, resilience can be built against other extreme weather events such as heatwaves and droughts.

Improving water quality and managing water resources

The delivery of the LFRMS will support better management of water as a valuable resource. Some SuDS help to reduce polluted runoff from entering the combined sewer network and the River Thames through their natural filtration process. Encouraging water reuse within buildings as well as the integration of attenuated rainfall into soft landscaping irrigation processes also supports water resources to be used more efficiently. This is particularly important in the context of the 'hotter, drier summers' climate projections for the Square Mile.

Protect and enhancing biodiversity

The LFRMS will support biodiversity and green spaces across the Square Mile through the introduction of SuDS and flood defence works which follow the

Riverside Strategy approach. This supports the City Corporation's [Biodiversity Action Plan](#), which was published in 2021, specifically around its theme of 'the built environment' which aims to improve infrastructure for biodiversity in the built environment and the [City Plan 2040](#)'s Open Spaces & Green Infrastructure Policies OS2, OS3, OS4 and OS5.

Protecting historic assets

The Square Mile is the historic centre of London and has a rich and varied historic environment, including over 600 listed buildings alongside other historic statues, monuments, sculptures and archaeological remains. By reducing flood risk and promoting flood resistance and resilience measures, the LFRMS will help to protect and preserve at risk historic assets such as those to the south of Thames Street, Tudor Street and along Farringdon Street as well as the historic Temple Gardens. This will also contribute to the [City Plan 2040's](#) Heritage & Tall Buildings Policies HE1 and HE2.

Appendix A Legislative and policy context

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| <p>National</p> | <p><u>Civil Contingencies Act</u> (2004) deals with civil protection matters and sets out the roles of responders to emergencies, including flooding. Under the Act, Local Authorities and the EA are Category One responders.</p> |
| | <p><u>Flood and Water Management Act</u> (2010) sets out the legislative framework for the management of flood risk in England, including the definition of the Lead Local Flood Authority and the requirements of a Local Flood Risk Management Strategy. It is noted that Schedule 3 of the Flood and Water Management Act was not enacted in 2010 but a recommendation to enact Schedule 3 was passed from Defra to government. A decision is still awaited.</p> |
| | <p><u>National Flood and Coastal Erosion Risk Management Strategy</u> (2020) sets out a framework for RMAs involved in managing flood risk in order to increase the nation's flood resilience. The publication of the NFCERMS was followed by an Action Plan aligned with the long-term objectives of the NFCERMS.</p> |
| | <p><u>National Planning Policy Framework</u> (2024). The NPPF sets out the planning policies to provide sustainable development and is published by the Ministry of Housing, Communities and Local Government. The NPPF sets out the national planning policies in England that development is expected to meet. The NPPF is supported by Planning Practice Guidance, including the <u>Flood Risk and Coastal Change</u> PPG, which is revised as necessary. In 2025, consultation took place on a revised NPPF. At the time of publication, the results of the consultation are awaited.</p> |
| | <p><u>National Standard for Sustainable Drainage Systems</u> (2025) The original Non-Statutory Technical Standards for the design, maintenance and operation of SuDS were set out by DEFRA in 2015 and were to be used in conjunction with the NPPF and PPG. The new national standards were most recently updated in July 2025. These standards are intended for application in the design of surface water drainage systems for new infrastructure and development.</p> |
| | <p><u>National Flood Risk Assessment 2</u> (2025) This assessment, carried out by the EA, provides a single picture of current and future flood risk from rivers, the sea, and surface water for England. It uses the best available data both from the EA and local authorities.</p> |

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| Regional | <p><u>Thames Catchment Flood Management Plan</u> (2009) is a plan which helps RMAs such as the EA to plan and agree the most effective ways to manage flood risk in the future. A CFMP considers all types of inland flooding CFMPs also consider likely effects of climate change, land use change / management and the need for future development.</p> |
| | <p><u>London Regional Flood Risk Appraisal</u> (2018) produced by the Greater London Authority to inform the London Plan reviewed the risk of flooding from all sources across Greater London.</p> |
| | <p><u>The London Plan</u> (2021) produced by the Greater London Authority sets out regional planning policies for Greater London.</p> |
| | <p><u>Thames River Basin Management Plan</u> (2022) produced by the Environment Agency sets out the pressures facing the water environment in the river basin district and the actions that will address them.</p> |
| | <p><u>Thames Estuary 2100 (TE2100) Plan</u> (2023) produced by the Environment Agency sets out the plan for managing the risk of tidal flooding in the River Thames estuary to 2100, including local actions for individual councils to take.</p> |
| | <p><u>Drainage and Wastewater Management Plan</u> (2023) produced by Thames Water Utilities Limited sets out the priorities for investment in drainage and wastewater infrastructure between 2025 and 2050.</p> |
| | <p><u>London Climate Resilience Review</u> (2024) is an independent review that was commissioned by the Greater London Authority. The review provides an assessment of London's climate resilience and makes 50 recommendations for action to guide London's preparations for more frequent and intense climate impacts.</p> |
| | <p><u>London Surface Water Strategy</u> (2025) Following severe flooding in July 2021, the London Surface Water Strategy was developed by the Flood Ready London partnership, formed of the EA, London Councils, London Fire Brigade, Mayor of London, Thames Water and Transport for London with support from the Thames RFCC. The strategy sets out a collective approach from 2025 to 2030 for how London can address the real and growing risk of surface water flooding to communities, the environment, and the economy.</p> |
| Local | <p><u>Biodiversity Action Plan</u> (2021) sets out objectives and actions to support the wider Square Mile community in delivering strategically planned biodiversity networks, taking into consideration both local and national priorities.</p> |

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| | <p><u>Strategic Flood Risk Assessment</u> (2023) provides the most up-to-date information regarding the risks the City faces from tidal, surface water, sewer and groundwater flooding. The SFRA includes mapping of flood modelling that has been undertaken for the Square Mile. The SFRA reflects the policy framework as of April 2023, a forward look chapter lists likely changes.</p> |
| | <p><u>Climate Action Strategy</u> (2020) sets out how the City Corporation will achieve net zero, build climate resilience and champion sustainable growth, both in the UK and globally, over the next two decades to 2040.</p> |
| | <p><u>Riverside Strategy</u> (2021) The strategy sets out the approach to raising the flood defences over the coming century whilst also providing benefits to the workers, residents and visitors that use the Thames river frontage. The Riverside Strategy follows the Environment Agency's riverside strategy approach set out in the Thames Estuary 2100 (TE2100) plan. This is a holistic approach which looks at making flood defences more resilient to rising sea levels at the same time as creating opportunities for improvement. The TE2100 plan was reviewed and updated in 2023. The City of London Riverside Strategy was subsequently updated in 2025 to align with the latest TE2100 requirements.</p> |
| | <p><u>Corporate Plan</u> (2024) informs effective use of resources and guides planning and decision-making for the City of London Corporation from 2024 to 2029 through six strategic outcomes. The delivery of the LFRMS will support the following Corporate Plan outcomes: Leading Sustainable Environment, Diverse Engaged Communities and Vibrant Thriving Destination.</p> |
| | <p><u>Transport Strategy second edition</u> (2024) sets out a vision for the Square Mile's streets, public spaces and public transport system to ensure that it remains a great place to live, work, study and visit.</p> |
| | <p><u>Planning for Sustainability Supplementary Planning Document</u> (2025) provides guidance and sets out key actions and measures on five environmental sustainability topics that applicants should address in planning application proposals in the Square Mile.</p> |
| | <p><u>Multi Agency Flood Plan</u> (2026) produced by the City Corporation Borough Resilience Forum, the MAFP sets out the role and responsibilities for all relevant parties in respond to a severe flooding incident in the Square Mile.</p> |
| | <p><u>City Plan 2040</u> is the emerging local plan for the Square Mile, setting the City Corporation's approach to development up to 2040, together with policies that will guide future decisions on</p> |

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| | planning applications. It is anticipated that the City Plan 2040 will be adopted in early August 2026. |
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Appendix B Flood risk powers and responsibilities

Risk Management Authorities (RMAs) and other interested parties

The Flood and Water Management Act 2010 recognises the following authorities as RMAs:

- Lead Local Flood Authorities (LLFA)
- The Environment Agency
- Water companies
- Highways authorities
- Internal Drainage Boards (not relevant to the Square Mile)
- District and borough councils

These RMAs have a duty to co-operate with each other in the exercise of their duties and the power to take on flood risk functions from other authorities by mutual agreement.

The relevant risk management authorities for the Square Mile are the City Corporation as LLFA, the Environment Agency which exercises a national and regional role in co-ordinating flood risk management, Thames Water as the water company and sewerage undertaker for the City, and Transport for London as the Highways Agency for parts of the City. A number of other authorities, although not defined as RMAs, have a role to play in the management of flood risk in the City. These include the Greater London Authority (GLA) and Transport for London (TfL); Network Rail which manages mainline stations feeding the City; the Emergency Services and first responders in tackling flooding incidents; the Marine Management Organisation and the Port of London Authority; and neighbouring boroughs as LLFAs for their areas since they also influence the Square Mile's flood risk management.

The roles and responsibilities of all relevant RMAs and interested parties are summarised in the table below.

| Group | Function | Responsibilities |
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| City Corporation | Lead Local Flood Authority | <p>Strategic role in overseeing the management of local flood risk i.e. flood risk from surface water runoff, groundwater and ordinary watercourses.</p> <p>This includes responsibility for Develop, maintain, apply, and monitor a Local Flood Risk Management Strategy.</p> <ul style="list-style-type: none"> • Investigate and record details of flood events where appropriate and necessary. • Establish and maintain an asset register of structures or features which are likely to have a significant effect on flood risk. • Carry out flood risk management work if the work is considered desirable with regards to the Local Flood Risk Management Strategy for the area, and the purpose of the work is to manage flood risk from surface runoff, groundwater in the authority's area. • Undertake a statutory consultee role on surface water drainage proposals for major developments. |
| | Planning Authority | Ensuring that development does not increase vulnerability to flood risk for new and existing properties. |
| | Category 1 responder under the Civil Contingencies Act | Ensuring that systems and processes are in place to provide an emergency response to a severe flooding incident in the Square Mile. |
| | Highway Authority | Duty to maintain the highway including responsibility for drain and gully maintenance on non-strategic roads in the Square Mile. |
| Environment Agency | Strategic role | Taking a strategic overview of the management of all sources of flooding and coastal erosion. This includes |

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| | | setting the direction for managing the risks through strategic plans; providing evidence and advice to inform government policy and support others; working collaboratively to support the development of risk management skills and capacity and providing a framework to support local delivery. |
| | Operational role | <ul style="list-style-type: none"> Operational responsibility for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea, as well as being the coastal erosion RMA. Responsible for the inspection of flood defences and maintenance of the Thames Barrier. Advisory and statutory consultee role in the assessment of flood risk associated with planning policy and development. Advisory role in the assessment of Multi Agency Flood Plans. |
| Marine Management Organisation | Strategic role | Responsibility for preparing marine plans for English inshore and offshore waters including the tidal extent of the River Thames. |
| Thames Water | Sewerage undertaker | <ul style="list-style-type: none"> Responsible for provision and maintenance of the sewer network. Upgrade of sewer capacity to facilitate increased drainage capacity requirements. |
| Transport for London | Transport infrastructure provider | Responsible for provision and maintenance of strategi/c road network, London Underground and bus network ensuring their resilience to flood risk. |
| Network Rail | Transport infrastructure provider | Responsible for provision and maintenance of railway network serving mainline stations in the Square Mile and their resilience to flood risk. |
| Greater London Authority | London Drainage Engineers Group (LoDEG) | Facilitation of coordinated working on flood risk across London including provision of guidance and information. |

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| Flood Ready London | London Surface Water Strategy facilitation | Facilitation of London Surface Water Strategy and its associated Surface Water Catchment Partnerships. |
| Neighbouring boroughs | LLFAs for their areas | Strategic role of overseeing the management of local flood risk in their areas and liaison with other affected LLFAs. |
| Businesses and residents | Property owners, Square Mile occupants | <ul style="list-style-type: none"> • Property owners responsible for flood resistance and resilience and emergency and contingency planning associated with properties and occupants. • Riparian owners are responsible for the maintenance of flood defences. |
| Utility companies | Utility providers | Responsible for provision and maintenance of utility infrastructure e.g. electricity, gas, telecommunications and ensuring its resilience to flood risk. |

Appendix C SEA screening report

Appendix D HRA screening report

Appendix E Glossary and Key Terms

| Term | Definition |
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| Catchment | The total area of land within a drainage basin where water drains and is collected before flowing into streams, rivers and lakes. |
| City Flood Risk Area (FRA) | Areas of the Square Mile that are at risk of river or surface water flooding as defined in the City Plan 2040. |
| Flood Zones | <p>Environment Agency defined zones which signify the probability of river flooding in a particular area. The probability values ignore the presence of any flooding or sea defences.</p> <ul style="list-style-type: none"> • Flood Zone 1- Low probability of flooding - less than 1 in 1,000 annual probability of river or sea flooding (1%) • Flood Zone 2 – Medium probability of flooding - between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%). • Flood Zone 3 - High probability of flooding - a 1 in 100 or greater annual probability of river flooding (>1%). |
| Fluvial flooding | This means river flooding and is when a river overtops and overflows as a result of sustained or intense rainfall. |
| Groundwater | Water found beneath the ground, stored in the cracks and gaps in soil, sand and rock, and in aquifers. |
| Habitat Regulations Assessment (HRA) | A process that determined whether or not development plans could negatively impact local plans on a recognised protected European site. |
| Infiltration | This is the process in which water at the ground surface enters the soil into the subsurface. |
| Lead Local Flood Authority (LLFA) | The local authority with the statutory responsibility for flood risk |

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| | management in its local area. The City Corporation is the LLFA for the Square Mile. |
| Local Flood Risk Management Strategy (LFRMS) | Strategy for managing flood risk at a local level as required by the Flood and Water Management Act 2010. |
| Multi Agency Flood Plan (MAFP) | Emergency plan for responding to a severe flooding incident. |
| Risk Management Authorities (RMAs) | Authorities defined in the Flood and Water Management Act as having flood risk responsibilities. |
| Slow the flow | An approach to managing rainfall through the use of SuDS to slow the flow of water to allow it to soak into the ground, be stored, or used by vegetation. |
| Strategic Environmental Assessment (SEA) | A Strategic Environmental Assessment is an organised procedure to assess environmental impact associated with a program, plan or policy. |
| Strategic Flood Risk Assessment (SFRA) | A Strategic Flood Risk Assessment is a document that assesses and maps the risk of flooding from all sources of flooding and the impacts of climate change. It is used by planning authorities when making land use allocation and determining planning applications. |
| Sewer flooding | When sewers become blocked or reach full capacity during heavy rainfall and the sewer water overflows out of them. |
| Surface water | This is water that falls as rain and collects on the ground surface, before flowing into drains and gullies or percolating into the ground below. |
| Surface water flooding | Surface water flooding occurs when rainfall exceeds the capacity of drainage systems and cannot infiltrate into the ground quickly enough, resulting in water flowing overland and accumulating within low-lying areas. |

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| Sustainable Drainage Systems (SuDS) | Water management measures designed to drain surface water runoff in a manner that will slow, reduce and treat it providing a more sustainable approach than the traditional direct connection to the combined sewer system. |
| Thames Estuary 2100 Plan (TE2100 Plan) | The Environment Agency's plan for addressing flood risk management in the Thames Estuary up to the year 2100. |