**Environment, Food and Rural Affairs Committee**

Robbie Moore MP
Department for Environment, Food and Rural Affairs
London
*By email*

14 May 2024

Dear Robbie,

**Flooding preparedness**

I am writing to outline my Committee's conclusions and concerns following its recent work on flooding preparedness in England. The Government's Flooding and Coastal Erosion Management (FCERM) investment programme has provided a tangible benefit to many communities. However, as we heard in an evidence session with the Local Government Association, the Environment Agency, the National Flood Forum and the Nature Friendly Farming Network on 20 February, elements of the programme must change to respond to the threats posted by climate change, housebuilding in at-risk areas and the declining condition of defence assets.

The Government and Environment Agency (EA) acknowledge that several of these threats, particularly surface water flooding, cannot be tackled by simply building more concrete flood defences. The condition of EA-maintained defences has declined due to a lack of resources, so more funding needs to be directed towards maintenance. Capital investment must shift more towards localised infrastructure and adaptations, such as Sustainable Drainage Systems (SuDS), Property Flood Resilience (PFR) measures and Natural Flood Management (NFM). These smaller and often less expensive measures can serve smaller communities and can provide a good return on investment, particularly when used extensively and in tandem with each other and grey infrastructure. Nature-based solutions can also provide other social, health and environmental benefits, often not factored into how FCERM investment is allocated. As such, I would like to begin by drawing your attention to the findings set out in our letter to the Department on 14 March 2024 regarding Urban Green Spaces, which

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highlighted the importance of prioritising green infrastructure to improve flooding resilience in population centres.

The Government and the EA have improved the evidence base for nature-based interventions and are building confidence in the SuDS and PFR industries by improving the training available and industry codes of practice. However, the Government is a long way from achieving its ambition to mainstream these measures. PFR installations remain piecemeal and prohibitively expensive for many, despite welcome initiatives like the Property Flood Resilience Repair Grant Scheme and the Build Back Better Scheme. The Government's £100m Frequently Flooded Allowance is welcome but is likely insufficient to protect many of the homes in flood-risk areas that are unlikely to benefit from future flood defences. Many local authorities want to invest in surface water management and NFM but lack the resources or skills to demonstrate returns on investment. While we recognise you are taking steps to address this issue, many local authorities also find the FCERM investment programme too bureaucratic and expensive to justify applications for such smaller interventions. It is evident that local authority budgets are too stretched to invest other resources into PFR, NFM or SuDS at sufficient scale.

We see merit in the National Infrastructure Commission's (NIC) proposals for local flood risk reduction targets which may encourage the reallocation of some local budgets towards flooding resilience. Private finance could provide another solution but, despite many businesses standing to gain from better flood defences, the partnership funding approach has succeeded in securing only 9% of flooding investment from the private sector. Drainage and Wastewater Management Plans will lead to a degree of collaboration between water companies and risk management authorities, but stronger drivers are needed to encourage investment, particularly from infrastructure companies whose assets are at significant risk from flooding. Potential approaches could include the creation of markets for flooding mitigation, tax incentives and changes to construction codes and planning requirements: for instance, on top of its plans to require the installation of SuDS on new builds, PFR measures could be a requirement for buildings at risk of flooding.

Riparian owners of flooding assets and other landowners could also do more. However, there is limited information on the state of privately owned flooding defences and public awareness of individual responsibility is limited: trends so far suggest a rise of impermeable surfaces, such as paved front lawns, and a slow take-up to flood alerts. The updated National Flood Risk Assessment (NaFRA) due this year should be seen as an opportunity to educate those at risk. Incentives, such as lower drainage fees for better drainage assets, or permitted development reforms could encourage better practices and investment in the private sphere.

The planning system, if well implemented, can ensure that new homes are sufficiently protected, even if built in a floodplain. Efforts by the EA to improve local skills are welcome, including better mapping tools and the new data that will be provided by

NaFRA but further improvements to local capacity are needed to make the best use of NaFRA data, and to ensure that planning conditions are enforced. Nature-based solutions and SuDS also require new expertise amongst planners and other delivery agents. Although the Government has acknowledged the capacity issue, allowed an increase in planning fees and introduced the Planning Skills Delivery Fund, it has also made it clear in its response to our letter on Urban Green Spaces and its response to the LUHC Committee report, *Financial distress in local authorities*, that fundamental changes to local authority revenues are not an option.

The farming sector has seen unprecedented levels of water logging over the past year, with likely disastrous results for food production and subsequent implications for farmers' finances and consumer prices. Not only is support needed post-flood, but also landowners such as farmers could be better incentivised to adapt their practices and adopt more NFM measures that could protect themselves and others.

With these findings in mind, we would appreciate a response to a number of questions, highlighted in bold below, by 7 June.

*Investment in funding defences*

1) NFM, PFR and SuDS will be a bigger feature in the next iteration of the EA's Long Term Investment Scenarios (LTIS) analysis which is expected to inform the next FCERM investment programme, not due to start until 2027. In the meantime, many already viable projects may have to wait before their communities can benefit from them. **What assessment has the Government and the Environment Agency made of the potential merits of bringing forward the schedule for the next LTIS analysis to inform the current FCERM investment programme? Will the updated LTIS take better account of the wider social and environmental benefits that NFM, PFR and SuDS can bring?**

2) We have heard that grants for PFR have ambitious spending deadlines and do not fully cover the costs of the measures that may be required. **What consideration has the Government given to making (a) the PFR spending deadlines more flexible and (b) more grants available for more disadvantaged households and communities that will struggle to afford PFR?**

3) As noted to the Public Accounts Committee (PAC), the Government and the EA are looking at how to balance capital and maintenance spending. To achieve optimum value for money, the EA has previously stated that 98% of high-consequence flooding assets should be in a favourable condition. **Can the Government indicate whether this will be the aim for future investment in flooding defences? Given that many flooding defences are owned by private landowners, what assessment has been made of (a) the state of these assets and (b) whether further inventions are necessary to ensure that these are in good condition?**

4) The Government has accepted NIC recommendations to explore more funding options for PFR and review policy options to manage unplanned increases in

impermeable hard surfaces. However, these choices are only some of the ways that home and landowners can affect flooding risks, and businesses also will need to play a role. **Will the Government commit to a wider review, by the end of 2024, of the mechanisms available to (a) build awareness of flood risks and (b) require or incentivise more sustainable water management on private property and private investment into flooding mitigation and defences?**

5) Several stakeholders have suggested devolving elements of FCERM funding to lead local flood authorities (LLFAs). A single funding pot could invest in place-based interventions that reinforce each other, rather than focusing on individual projects. This could remove bureaucratic hurdles to smaller projects, give more confidence to investors and enable LLFAs to consider other actions - such as education programmes - to encourage the retrofit of flooding defences. A devolved funding pot could also be combined with private sector contributions to boost impact. We noted the benefits of blended funding approaches during our Urban Green Spaces inquiry, but the Government's response to our letter was unclear on how it would support such innovative solutions. The Government is reticent about devolving funding halfway through the current investment programme and points to efforts by the EA to "explore" more co-financing for a whole package of measures, rather than individual projects. **What is the timeline for exploring co-financing options? If this proves to be challenging, how else will the Government support innovative local funding solutions to finance more PFR, NFM and SuDS?**

*Local capacity and skills*

6) We have heard that local authority costs for core flooding responsibilities, such as post-flood clean-up activities, are not covered by the grants they receive or the fees they can charge. Although the Government told the PAC that local planning authorities have sufficient powers and resources to enforce planning conditions related to flood defences, we continue to hear that long-term monitoring may be limited. **What assessment has the Government made of the affordability of costs incurred by local authorities when carrying out their flooding responsibilities, including post-flood clean-up and monitoring of planning conditions, and whether more revenue raising powers or grants are needed to cover these costs?**

7) As we heard during our Urban Green Spaces inquiry, local authorities would benefit from guidance on how to use Government initiatives, such as Biodiversity Net Gain and Local Nature Recovery Strategies, to encourage the use of nature-based solutions. The Government response to our letter, however, did not address this suggestion. **What progress has been made to "align" flood planning with Local Nature Recovery Strategies and the future Land Use Framework to encourage the use of nature-based solutions, as the Government promised in its Plan for Water?**

8) The Government is working on a Green Jobs Plan. **Will flooding prevention – especially nature-based solutions – be a key part of the Green Jobs Plan?**

9) We welcome ongoing work by the EA to identify and fill local training gaps but capacity could also be improved through greater collaboration. **What assessment has the Government made of the merits of (a) pooling local flooding resources, (b) making the EA a statutory consultee for developments in areas with surface water flooding risks and (c) supporting more collaboration with NGOs?**

*Farming*

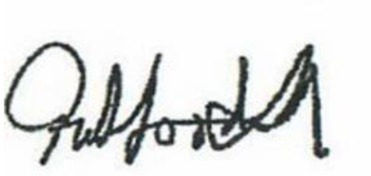
10) Initiatives such as the Farming Recovery Fund are welcome but, as this is tied to the activation of the Flood Recovery Framework, some badly flooded areas of the country are not receiving this support. The Government is reviewing the eligibility criteria but the impact on unsupported farmers continues. **Why is the Farming Recovery Fund tied to the Flood Recovery Framework and what progress has been made on reviewing the eligibility criteria?**

11) Countryside Stewardship can encourage NFM measures, but the Sustainable Farming Incentive supports much fewer. **What assessment has the Government made of how ELM schemes can be adapted, or more farmers encouraged into Countryside Stewardship, to encourage more NFM actions?**

12) Farmers need specialist advice to adapt their business to a wetter climate. Despite the work of the Catchment Sensitive Farming service, we have heard that more catchment-based, holistic, on-farm advice is needed, supported by an integrated water management strategy to use excess water more efficiently. We have also heard that planning permissions, environmental permits and other requirements for changing the structure of land can inhibit NFM actions. **What assessment has been made of barriers to more NFM in the agricultural sector such as (a) the need for planning permissions and permits and (b) a lack of whole-farm, landscape-level advice and collaboration? What plan does the Government have to address these concerns?**

I look forward to your response.

Yours sincerely,



**Rt Hon Sir Robert Goodwill MP**
**Chair, Environment, Food and Rural Affairs Committee**