

Written evidence submitted by The Westminster Sustainable Business Forum (WSBF) (FLO0084)

Consultation response: will Government's 'ambitious' new flooding strategy deliver?

This document forms an addendum to the Westminster Sustainable Business Forum's response to the EFRA committee's recent call for evidence on flood risk management in England, submitted on 6th May 2020.

The Westminster Sustainable Business Forum (WSBF) is Policy Connect's high-level coalition of key UK businesses, Parliamentarians, Civil Servants, academics, and other organisations. Providing a politically neutral environment for knowledge sharing and discussion on sustainability policy, we help to inform the wider sustainability agenda in government and are a trusted source of independent information and advice for policymakers. We publish authoritative research reports; impact on government policy through our in-depth round table policy discussions and outputs; and inform the wider sustainability debate by convening Parliamentarians, senior Civil Servants, business experts and other stakeholders at our larger policy events and seminars. The WSBF works in the policy areas of construction, infrastructure, water, sustainable planning, green finance and natural capital. We are cross-party, independent and not-for-profit.

Introduction

We welcome the Environment Agency's updated Flood and Coastal Erosion Risk Management Strategy and accompanying Government policy statement, setting out long-term plans to protect communities from flooding. The WSBF has been focussing on this policy area for a number of years and in particular, we welcome greater investment in natural flood management schemes and nature-based solutions. We are also pleased to see greater emphasis on adaptation of existing buildings to improve their resilience to flooding and acknowledgement that issues surrounding water management and flooding must be considered at the catchment-scale.

However, past intentions to manage water effectively have often not been implemented (for example, Schedule 3 of the Flood and Water Management Act for mandatory use of SuDS or recommendations in the Pitt Review for discharge of surface water to public sewers) and it is therefore crucial that the Government makes good on these commitments. Furthermore, there are areas where the Government must go further, in particular, to promote the uptake of property flood resilience measures in vulnerable homes, which is currently only being undertaken at a fraction of the pace required.

Finally, it should be recognised that flood and planning policy go hand-in-hand, given that new development can often exacerbate the risks from flooding, especially where this is located on the floodplain. Risks to new development from flooding receives little attention in the Government's current White Paper – Planning for the Future and this should be higher on the agenda. We therefore recommend that both DEFRA and MHLCG own future policy statements on flooding, given how closely these two areas are linked.

1. How effectively do the new Government policy statement and Environment Agency strategy meet the challenge posed by a changing climate?

Part I of the Government's Policy Statement highlights the commitment within the 2020 budget for investment of £5.2 billion over six years for flood and coastal defences in England¹. However, even including the additional £170 million announced recently, this falls short of the £1 billion per year estimated by the Environment Agency as the optimal, long term average level of investment².

We recommend that funding to manage flooding and coastal erosion is increased to £1 billion annually, in line with recommendations made by the Environment Agency

Although increased funding for formal flood defences to protect communities against flooding from rivers and the sea is welcome, climate change is leading to more frequent flooding from a variety of sources, such as surface water runoff and sewer surcharge. It is not realistic or cost-effective to work on the basis that all communities can be fully protected from all sources of flooding indefinitely – flooding is going to keep happening.

Adapting homes so that they are more resilient to the effects of climate change is therefore crucial. At the property-level, resilience measures reduce the costs associated with building restoration and allow homes to be re-occupied more quickly. Our forthcoming inquiry, *Bricks and Water 2*³, explored this issue in detail including necessary updates to Building Regulations.

We recommend Part C of Building Regulations should be updated to require all properties at risk of flooding to include property flood resilience measures. These measures should be specified and installed in accordance with the industry Code of Practice⁴ for property flood resilience.

Part II of the Policy Statement includes a commitment to promote the uptake of Sustainable Drainage Systems (SuDS) to reduce flood risk and increase water quality. Simple legislative changes that would help to achieve this, but are not included within the Government's proposed actions.

We recommend that the use of SuDS should be made mandatory for all new development in England by enacting relevant sections of Schedule 3 of the Flood and Water Management Act, in line with recent changes made in Wales.

We recommend removal of the automatic right for new development to discharge surface water to existing public sewers, in accordance with recommendation 10 made within the 2008 Pitt Review.

Part III of the Policy Statement focusses on the importance of nature based solutions, including natural flood management practices. These techniques can be highly effective in mitigating the impacts of climate change, especially managing increased rainfall in the upper catchment. Part III of the strategy also mentions the forthcoming Environmental Land Management scheme, which will replace the existing payment system under the Common Agricultural Policy. Within our 2018

¹ Budget 2020: delivering our promises to the British people, HM Treasury, March 2020

² Long term investment scenarios 2019, Environment Agency, May 2019

³ Bricks and Water 2: property resilience for new and existing homes, Policy Connect, September 2020

⁴ Code of practice and guidance for property flood resilience, CIRIA, November 2019

inquiry, *Bricks and Waters*⁵, we drew attention to the key role that land managers and farmers play in upstream measures to improve water quality and reduce flood risk. We recommended that practices that work with nature, such as tree planting, soil restoration, and storage of floodwater should therefore be put high up the list of priorities for public subsidy. Part II of the statement makes reference to encouraging and enabling farmers to design and build water storage facilities in a way that can also provide additional benefits to support flood management, and Part III refers to using the new Environmental Land Management Scheme to ‘support’ natural flood management measures.

We recommend that natural flood management and nature-based practices are funded urgently as priorities in the introduction of the Environmental Land Management scheme. These measures create wider environmental benefits that will accrue such as increased biodiversity and improved soil health.

We welcome the £200 million announced in **Part IV** of the Policy Statement for a proposed Resilience Programme, targeting 25 places over six years. The programme will trial and evaluate how different actions can improve resilience to flooding and support communities to adapt their homes to a changing climate. Within *Bricks and Water 2*, we proposed a system for measuring the ‘water performance’ of existing buildings, with the aim of making homes more water efficient and resilient to flooding. We view this proposal as being complementary to this forthcoming Resilience Programme, given that it will help homeowners within the most vulnerable communities to obtain practical and cost-effective recommendations on how to improve the water efficiency, flood resilience, and drainage arrangements of their homes.

We recommend that the Government should extend the proposed Resilience Programme to help residents understand the ‘water performance’ of their homes through updates to the existing Energy Performance Certificate. We will be happy to work with the Government in our follow-up work to *Bricks and Water 2* to help facilitate this.

Part IV of the Policy Statement also sets out proposed changes to the joint Government and Insurance Industry Flood Re scheme. These include discounted premiums to households that have fitted property flood resilience measures and permitting the payment of claims to include an additional amount to ‘build back better’ following a flood. We welcome these changes, which will help to accelerate the uptake of flood resilience measures. At present they are only being installed at a fraction of the pace required to make vulnerable communities insurable once Flood Re is withdrawn.

We recommend that Government implements proposed changes to the Flood Re Scheme and should make further changes to the scheme to cover residential buildings constructed after 1st January 2009.

Finally, we welcome proposals set out in **Part V** of the Policy Statement for a more catchment-based approach to flood management. We identified this as a priority within *Bricks and Water*, given the limitations associated with consideration of issues associated with flooding at a Local Planning Authority scale.

We recommend that this current governance gap at catchment (the term we used to describe the ‘sub-national’) level should be filled, through better funding for existing Catchment Partnerships.

⁵ *Bricks and Water: a plan of action for building homes and managing water in England*, Policy Connect, June 2018

While the aspirations in the Policy Statement are a good start, we recommend that this additional capacity must be provided to ensure implementation happens in reality.