

Written evidence submitted by the National Trust (FLO0089)

28 August 2020

With our staff, members, volunteers and supporters, the National Trust is the biggest conservation charity in Europe. We protect and care for places so people and nature can thrive. Many millions share the belief that nature, beauty and history are for everyone. So we look after the nation's coastline, historic sites, countryside and green spaces, ensuring everyone benefits. For everyone, for ever.

Introduction

Flooding is an issue of significant importance to the National Trust, including at the coast where coastal change and erosion threatens some of the places that we care for. We have adopted an approach that prioritises working with natural processes to manage coastal change (we have published two versions of the *Shifting Shores* report setting out this approach). Inshore, 43% of land in England and Wales drains to the boundary of a National Trust property, meaning that we have a significant interest in water in the landscape, its flow and its quality for people and biodiversity (which was covered in our *Source to Sea* report).

There are a number of important physical characteristics associated with climate change-driven coastal and fluvial flooding that shape the risks and consequences of flooding and which should be addressed in the Government's aims and priorities in national flood risk policy:

UK coastal flood risk is expected to increase over the 21st century and beyond under all emission scenarios considered. This means that we can expect to see both an increase in the frequency and magnitude of extreme water levels around the UK coastline.

Coastal flooding can occur solely as a consequence of flooding from the sea but it can also occur in combination with fluvial and pluvial flooding, underlining the importance of a joined up approach to Catchment Flood Management and Shoreline Management Planning

Changes in groundwater levels at the coast, in response to sea level rise, will impact on some coastal communities, subject to geology, hydrology and topography. Groundwater changes can force increased land instability leading to subsidence, or saline intrusion into groundwater, impacting on drinking water aquifers and the fabric of buildings.

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

1.1 Both the Government policy statement and the Environment Agency strategy are framed by the challenge of climate change and are explicit about the need to respond and adapt. We particularly welcome the emphasis on Nature Based Solutions and the integrated approach to land management to secure multiple benefits.

1.2 It is critical that adaptation to climate change is prioritised by Environment Agency, the Government and Local Authorities. At present, the UK's climate adaptation efforts lag behind those of even its climate mitigation efforts. The Committee on Climate Change's 2019 report on progress in preparing for climate change concluded that the risk of climate change from flooding was continuing to increase and that additional measures are necessary.

2. Are the current national and local governance and co-ordination arrangements for flood and coastal risk management in England effective?

2.1 Whilst the framework for coordination and governance is relatively clear, the implementation can be compromised by under-resourced LLFAs or a lack of join up at the local level. Floods and droughts are different ends of a spectrum and wider management of the water environment cannot be carried out in isolation. We believe management of the water environment needs to be joined

up from source to sea and the Environment Agency's strategic overview is central to this. Issues arise when local decisions are driven by sectoral interests (e.g. where objectives are more associated with drainage than flood risk management per se) and a strategic approach is needed if we are to deliver for floods, drought, people and a healthy environment.

2.2 We can see the potential for Catchment Partnerships to play a greater role in helping to engage communities with flood risk management. Their impact however is currently constrained by funding for coordination and we believe much more could be achieved through a relatively small increase in investment. Empowering local organisations that work with local communities to find solutions to local issues will help deliver the strategy ambitions for resilient communities. As noted later significant impact on flood resilience can be achieved through local low-cost nature-based interventions that also deliver other benefits for biodiversity and people. Governance and coordination need to empower local communities to become engaged and involved in the solutions for their local environment.

2.3 The responsibility for flood and coastal risk management sits largely with Defra. We are concerned that new development in areas known to be vulnerable to flooding inland and at the coast continues to occur and approvals for which sit outside the remit of Defra. This situation provides an example of where current national and local governance and co-ordination arrangements for flood and coastal risk management in England is not effective. The Ministry of Housing, Communities and Local Government (MHCLG) and The Planning Inspectorate need to play a greater part in flood risk management and help avoid adding to the number of residential and commercial properties being built in areas vulnerable to flooding. Catchment-scale land management could help to avoid this type of development, and could also help to ensure that new schemes such as ELM are targeted and incentivise sustainable approaches. The driver for development in inappropriate places is often linked to requirements for Local Authorities to deliver on housing numbers, meaning that concerns raised by the EA on vulnerability to current and future flood risk often get over ruled. In this respect current national and local governance and coordination arrangements for flood and coastal risk management in England are not effective. Reforms to England's planning system are an opportunity to reduce inappropriate developments that will increase flood risk in future, for example by ensuring flood risk is a factor taken into account when determining land-use zoning.

2.4 The current Shoreline Management Plan (SMP) Refresh, commissioned by the Environment Agency (EA), has underlined the value of the EA and Local Authority led Coastal Groups which bring together a wide range of stakeholders. Compared with a decade ago, when SMP2 was initiated, the majority of stakeholders within Coastal Groups increasingly recognise the need to embrace adaptive approaches to flood management. SMP Coastal Groups are an example of effective national and local governance and co-ordination arrangements for flood and coastal risk management, and they (and Catchment Partnerships) should share best practices and lessons learned between them.

2.5 Co-ordination of the English regional coastal monitoring observatories continues to deliver a solid evidence base for decision-making around approaches to flooding and coastal erosion risk management, and is another positive example of where national and local governance and co-ordination arrangements have worked well.

2.6 Forecasting and warning of flood and extreme weather events also continue to provide effective early warning of weather events likely to result in flood and coastal erosion risk.

3. What level of investment will be required in future in order to effectively manage flood risk in England, and how can this best be targeted?

3.1 It is hard to comment on overall levels of funding, but we are pleased to see recent announcements and specific budget allocations for natural flood management. If NFM is to be seen a legitimate flood risk management tool, it needs to be funded accordingly. We would like to see better cost-benefit approaches across all schemes to ensure the full range of benefits are considered when decisions are made about which approach to take (for example considering associated gains for carbon, access, biodiversity). However, for very small schemes in headwaters

where NFM can have a significant impact for local communities a “no regrets” policy could be adopted to ensure funding is not hampered by the necessity to build detailed business cases with cost benefit calculations as would be required for larger engineered schemes.

3.2 The impacts of climate change at the coast and inland are becoming ever more apparent. In 2018 the Committee on Climate Change’s Adaptation Sub-Committee investigated the long-term challenges of managing England’s coastline against the backdrop of a changing climate. Overall the report concluded that the current approach to coastal flood and erosion risk management in England is unsustainable in the face of climate change.

The key findings were:

- a. Coastal communities, infrastructure and landscapes already face threats from flooding and coastal erosion. These threats will increase in the future.
- b. In the future, some coastal communities and infrastructure are likely to be unviable in their current form. This problem is not being confronted with the required urgency or openness.
- c. Sustainable coastal adaptation is possible and could deliver multiple benefits. However, it requires a long-term commitment and proactive steps to inform and facilitate change in social attitudes.

We believe these key findings from the coast are just as applicable to flood risk management inland.

3.3. Over the past 15 years the National Trust has undertaken a phased and detailed approach to assessing the implications of sea level rise, increased storminess and thus the impacts of coastal flooding at our places through our Coastal Risk Assessment. This is complimentary to the public process of Shoreline Management Planning. We are using this information to develop Coastal Adaptation Strategies at our priority coastal change locations.

3.4 We believe it should be a priority for Government and Local Authorities to develop Adaptation Strategies as part of national and local flood risk management. This should be across catchments and along the coast, in a ‘Source to Sea’ based approach. We think that Government policy, the EA and LAs can help to drive this sort of innovation and best practice in adaptive approaches to flood risk management and ensure that resources are targeted to support adoption of appropriate land use and land management across catchments, including through mechanisms such as ELM.

4. How can communities most effectively be involved, and supported, in the policies and decisions that affect them?

4.1 EA and Local Authorities should continue to lead effective collaborative partnerships that enable communities most affected by flooding to be involved, and supported, in the policies and decisions that impact upon them. Community involvement should be a key principle of flooding policy and changes to the planning system should enhance and support community involvement in the connections between flooding and planning.

4.2 Achieving effective community involvement will require approaches to be tailored to a particular place and reflect the local aspirations and opportunities, economic and environmental needs of the place and the people. There cannot be a one size fits all approach but giving people and organisations control and choices about how they respond to flooding is vital, as long as the need is recognised to fund immediate and ongoing support for communities from the flood risk management authorities to sustain this approach.

4.3 We believe it is important that local communities can be supported to understand and play a role in managing their own flood risk. Whilst major flood and coastal erosion risk management schemes are necessarily the realm of the Environment Agency and major contracts there are many small scale risks that have the potential to affect lives and livelihoods. These smaller flood risk

issues are often amenable to small scale and cost-effective natural flood management approaches. It is important that communities and land managers are given the support to explore the potential for these and the means to execute such projects. Local organisations and NGO's often already hold local relationships and could be the most effective way to deliver these outcomes together with the local communities.

4.4 It is recognised and welcome that significant advances have been made in weather forecasting and storm tracking, and therefore the ability to communicate timely and accurate flood alerts that encourages people to move to safe places of refuge in anticipation of flood events. However public safety and welfare remains at risk as a consequence of flooding and the ability of local communities to recover varies. Work by the Joseph Rowntree Foundation has highlighted disadvantaged communities as being disproportionately affected by coastal and fluvial flooding. This is in part because social housing has historically been developed in areas prone to flooding, and because these communities lack the resources, through for example lack of insurance or savings, to begin the process of recovery. So in addition there may be good cause to consider 'targeted' support for the most disadvantaged communities.

4.5 In the section called "managing our flow more effectively", there is a call for those who have statutory responsibility for ditches/culverts/ordinary water course to meet their obligations in regard to clearance and management. Further support is required to help those with statutory responsibility to identify ditches/culverts that need clearance for sound flood risk reasons and those that could be left to help slow the flow and reduce flood risk downstream. There is a risk that all ditches/ordinary water courses are cleared regardless of their potential flood risk. Indeed it could be that regular wholesale clearance of these water bodies will actually increase flood risk further downstream when leaving them unclear results in minimal increase in flood risk near the water body. Those with statutory responsibility need support to help them understand and assess the management options available on a site by site basis. Again, this highlights the importance of the Environment Agency's oversight role.

4.6 A key Government aim and priority in national flood risk policy, in the light of the impacts of climate change, must be to ensure that Local Plans and Neighbourhood Plans play a more significant role in flood risk management as required by the National Planning Policy Framework. An example of this would be the use of Coastal Change Management Areas as a strategic tool within land use planning to guide issues such as land use allocations. A further example would be to ensure new development never increases the risk of flooding elsewhere. To achieve this the Ministry of Housing Communities and Local Government (MHCLG) and The Planning Inspectorate will need to play a greater part in flood risk management alongside Defra.

5. With increasing focus on natural flood management measures, how should future agricultural and environmental policies be focussed and integrated with the Government's wider approach to flood risk?

5.1 We welcome the increased focus on natural flood management and use of nature-based solutions. The Government's approach to flood risk must include using agricultural and environmental policies to achieve good land management that slows flows, and holds water, and in particular, achieves sustainable soil management. The potential conflict of use of land for intensive food production or achieving other benefits for water and biodiversity needs to be addressed through policies that value the public ecosystem benefits as well as those for food production. In some places both can be achieved but in others, decisions on land use need to be made, and policies should help direct these decisions or maximise the benefits by rewarding farmers for environmental outcomes alongside sustainable food production. Catchment management is complex and requires local design solutions to achieve the best value for the public including those for flood mitigation which often derive other benefits for biodiversity and people.

5.2 We consider that all those involved in flood risk management need to embrace and embed adaptive approaches to enhance the resilience of our environment to future flooding and in so doing contribute to wider environmental objectives. For example, managing change at the coast and making space for water in catchments need to be part of delivering the Nature Recovery Network for England.

5.3 All involved in flood risk management should be seeking to protect and enhance the built and historic environment along with a key role in protection of habitats, conservation and water environment. This fits with Government's wider ambition under the 25 Year Environment Plan, and we would like to see flood risk management authorities contributing to the delivery of key elements of the Plan, such as the Nature Recovery Network

5.4 We advocate harnessing adaptive approaches to coastal and fluvial flooding as a means to deliver on the 25 Year Environment Plan, utilising land management policy and funding (such as agri-environment schemes) as part of the delivery mechanism.

5.5 We believe that there is great potential for better management of soils and more direct natural flood management techniques to help with flood risk management, either alone, or in combination with more traditional engineered schemes. We welcome the proposed focus of the developing ELM scheme on public funds for public goods; water management (flooding and drought) and water quality are widely acknowledged as clear benefits from good land management.

5.6 Given the importance of floodplains for the natural functioning of rivers and as places where water is naturally stored during flood events, there is scope for better management of these areas. We would like to see floodplains given recognition in agricultural policy (as they are in planning policy albeit not always successfully). By designating floodplains as a specific land category within ELMs, land managers and farmers could be rewarded for the wide range of public goods that can be provided through 'flood-, biodiversity- and carbon-friendly' practices. In particular, the restoration and creation of species-rich floodplain grasslands which can store floodwater, have high wildlife value, store carbon and have a rich cultural heritage.

5.7 In the wider catchment away from the river and its floodplain, small scale and cost-effective interventions could also deliver some flood risk benefit alongside other benefits such as carbon and wildlife. At large scales, restoration of our upland blanket bogs has clear natural flood management as well as carbon and biodiversity benefits whilst wetlands, leaky dams on small streams and better soil management can be implemented across farms to deliver multiple benefits in the same way.

5.8 A more integrated approach to managing water flows, water quality, soils and biodiversity should be at the heart of flood, agricultural and environmental policies but there needs to be a recognition that it will not be possible to deliver all benefits everywhere. Many of the benefits are context and location specific and so to ensure the best outcomes land managers and farmers will need access to specialist advice. We have been working on the potential for natural flood management with a group of farmers in the Yorkshire Dales as part of our Payments for Outcomes trials. This group have shown lots of interest in implementing NFM measures but wanted to know (a) how work on their farm would affect flood risk downstream; and (b) how measures might affect their farm business (how often and for how long would land be underwater). These reflections further emphasise the need for technical input to ELM schemes with NFM objectives.

5.9 With respect to the interaction between flood risk management and biodiversity policies, there is a complex relationship in which some flood management solutions can be win-win and others in which protecting lives and properties can have negative impacts on biodiversity. Where possible there should be a presumption for those solutions which can deliver both. Where flood and coastal erosion management policies directly impact on biodiversity it is important that compensation is put in place (assuming that mitigation hierarchies have been applied). The Environment Agency has delivered a significant area of compensatory habitat in the past through the Habitat Compensation Scheme; it is important that habitat benefits continue to be delivered in future and Biodiversity Gain should play a role in helping to deliver this and should be applied to flood and coastal policies.

6. How can housing and other development be made more resilient to flooding, and what role can be played by measures such as insurance, sustainable drainage and planning policy?

6.1 A significant issue which crosses floods and water quality is CSOs (Combined Sewer Overflows). We believe it should be specifically included in the policy statement. This is a flooding issue that results in a water quality problem. The management of surface water is the key issue. In

order that we do not allow raw sewage into rivers we need to better manage surface water before it gets into the foul drainage system. This means retrospectively dealing with existing surface water connections and better planning for any new development that will contribute in the future. Surface water diverted elsewhere e.g. SUDS can create fantastic habitats and amenity areas so we just need to plan and create them rather than allowing it to flow into the foul drain. Education and a change in planning standards are required to facilitate this change. It will result in both flood risk and water quality benefits.

6.2 It is hard to say as yet what the impact of proposed planning reforms in the Government's recent planning white paper are likely to be on flooding, as much more detail is needed on the guidance, regulation and standards that will be put in place around the zonal system proposed. Reforms to England's planning system could potentially help reduce inappropriate developments that increase flood risk in future, for example by ensuring flood risk is a factor taken into account when determining land-use zoning. There may also be an opportunity and value in putting SuDs onto a statutory footing, and planning for greater strategic use of nature-based approaches such as treatment wetlands in association with new housing development. However, there is also a risk of unforeseen consequences of development where outline approval is presumed in areas earmarked for growth or renewal. We want to see any changes to the planning system contribute to better use and management of water resources and deliver sustainable development with climate resilience and net gain for biodiversity in mind.