

**Written evidence submitted by Cllr Dr Erica Lewis, Leader Lancaster City Council
City Councillor for John O'Guant, County Councillor for Lancaster South East (FLO0100)**

Not submitted on behalf of either Lancaster City Council or Lancashire County Council.

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

It's not clear to me that they do.

Shifting risk to individual residents & businesses rather than doing catchment management

The area I represent as a county councillor, south Lancaster, has flooded three times in three years, including twice in August 2020. But the policy presented will continue to leave these residents and small businesses to struggle by themselves. The Bellwin Scheme was not activated for any of these flood incidents, neither residents nor businesses have received support for property level defences, and the flood risk mitigation scheme identified by the Environment Agency does not meet the funding requirements. None of this would appear to change under the new policy.

Statements like the below:

We will ensure our communities and businesses have the information they need to take ownership of their resilience. We will provide support to communities to increase awareness and understanding of risk, and share advice on steps which can help to better prepare. (p7)

reaffirm for my community that we are on our own in trying to deal with flood risk. There seems to be something of a fundamental mistake in the governments understanding of flooding – they respond when there is largescale impact. But residents and businesses don't experience flooding as a collective, it is devastating for each household and business individually.

The flooding in south Lancaster is a combination of surface water flooding and Burrow Beck (which is mostly main river) overflowing. With climate change, overwhelmed infrastructure and a planning system geared to maintain the status quo on water, it is likely flooding in south Lancaster will get worse, without intervention. This policy doesn't convince me that government intends to change anything that will help the residents of south Lancaster.

Slightly further south but still in Lancaster is the village of Galgate. It too has repeatedly experienced flooding. It too has been told that the flood risk mitigation scheme identified by the Environment Agency will not be funded.

The village of Halton and low-lying areas of central Lancaster are still waiting for the results of their catchment studies, initiated after Storm Desmond.

But flooding from watercourses is not our only flooding problem.

No requirement to upgrade basic infrastructure to cope with climate change

A good downpour in our districts sees a number of houses and small businesses routinely flood because our drainage infrastructure is overwhelmed. However, when investigated no agency is at fault because the drainage systems are not required to meet the intensity of these rain events. This is little comfort to the residents and small businesses who routinely flood across the district.

I have previously asked United Utilities, through the scrutiny processes of Lancashire County Council, whether they would consider increasing drainage capacity in places where we know that drains are regularly overwhelmed. The answer given was patronising, and certainly not sympathetic to the long-term impact on residents and small businesses. The policy document would seem to indicate that the government is not contemplating any changes to the current position.

Ordinary watercourses and drainage assets and features – including drains, ditches, culverts, pipes and gullies can, if blocked or overwhelmed, cause small-scale flooding. We want to ensure that all those who have statutory responsibilities for these assets and features – both existing and those in new developments – are meeting their obligations. (p22)

The consequence of this position will be repeated flooding for residents and small businesses as climate change increasing the frequency and intensity of rain events.

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

No.

The current arrangements are both ineffective in terms of flood risk management and frustrating for residents. It is very confusing and frustrating for residents and local businesses to be passed from one agency to another. Often without ever finding anyone who will take responsibility for the flooding they experience.

Across Lancashire there are a series of 'making space for water meetings' which bring together technical officers at the district level across the many agencies involved in water management. Local flood action groups have repeatedly asked for the opportunity to engage with these meetings and been refused¹. We appreciate that there may need to be some technical discussion behind closed doors. However, we also think it would significantly contribute to water management if local flood groups could have the opportunity at the beginning of each meeting to share local

¹ pp7, 11-12, The future of Flood Action Groups in Lancashire Scrutiny inquiry session – July 2019, <https://council.lancashire.gov.uk/documents/s162621/Appendix%20%20Report%20of%20the%20Strengthening%20Flood%20Risk%20Management%20and%20Preparedness%20Task%20and%20Finish%20Group.pdf>

observations and ask questions about particularly risk points. That everyone is in the room, would mean that residents should at least be able to get a clear agency on which agency was responsible.

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?

It seems a significant oversight in the current funding system that residents and small businesses can repeatedly experience flooding but not receive any support for property level defences. Supporting property level flood defences would allow residents to feel more secure in their homes, it would reduce the need for evacuations and reduce the level of emergency response needed. At the moment, I know many residents who are in fear of flooding every time there is heavy rain. This has a significant impact on well-being and mental health.

As I have already noted, it seems a fundamental misunderstanding of the impacts of flooding, to believe that central government support is only needed in response to large scale events, rather than for each household and business that floods.

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

As part of a recent scrutiny inquiry into flooding at Lancashire County Council we brought together some of the flood action groups across Lancashire. The point of the meeting was to

discuss how the County Council as the Lead Local Flood Authority (LLFA) and Risk Management Authorities (RMA) could better support and meet the needs of flooded communities in Lancashire. It aimed to provide participants with an opportunity to impart their expectations, aspirations, knowledge and experience of establishing and running a flood action group in Lancashire. The purpose was not to say who was responsible for what.²

The committee may find the report of the meeting useful in considering this question. It is available from

<https://council.lancashire.gov.uk/documents/s162621/Appendix%20%20Report%20of%20the%20Strengthening%20Flood%20Risk%20Management%20and%20Preparedness%20Task%20and%20Finish%20Group.pdf>

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?

² p2, The future of Flood Action Groups in Lancashire Scrutiny inquiry session – July 2019, <https://council.lancashire.gov.uk/documents/s162621/Appendix%20%20Report%20of%20the%20Strengthening%20Flood%20Risk%20Management%20and%20Preparedness%20Task%20and%20Finish%20Group.pdf>

Natural flood management should become a focus of how we use land and manage water in areas that are currently at risk of flooding, or our projected to become at risk. However, if we are to ask farmers and other landowners to make land available for water management, we need compensate those landowners for that use.

We also need to value agricultural land more highly in terms of flood risk mitigation. Following Storms Desmond and Eva a number of local farms were flooded, however, because it was fields that were flooded rather than buildings, there was very little support for these farmers. Water stood on those fields for an extended period, repeated crops were lost, but the farmers were left to deal with this situation largely by themselves, other than the support of their local MP.

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?

The current planning system does little to help manage flooding or flood risk. I wrote to the last review of the National Planning Policy Framework asking that the standard for water management be changed from the current 'no more, no faster' to 'hold and slow'. I'm not aware that this recommendation was accepted. However, without this change the planning system at best doesn't contribute to reducing flood risk and at worst makes flood risk worse.

How can it be sensible to allow development on a piece of land in an area with a known flooding problem and not ask that the development makes a contribution to holding and slowing water in order to reduce flood risk? If the government wants local communities to be more supportive of new developments, then ensuring that those developments contribute to solving major local problems would seem to be a very sensible suggestion. Expanding drainage systems beyond current requirements is also likely to be a more cost-effective solution, than requiring entirely new drainage schemes.

As an illustration, there is a parcel of land in Lancaster that is both of interest to a volume housing builder as a development site, and to the Environment Agency as the possible site for a reservoir. The builder currently plans to build just above the flood exclusion zone, thus probably removing the ability for an objection to be made on flood grounds. The builder has been asked to consider adopting higher water management standards on the site both to protect potential homeowners and reduce the downstream risk. They say no, and yet if this development were to go ahead south Lancaster would lose a significant opportunity to reduce flood risk.

Our communities also need more assurance about the quality of water management in planning applications. As part of an overview and scrutiny inquiry on flooding in Lancashire the task and finish group was told that "the flood risk management team deals with approximately 1000 applications a year with only five team members to assess them"³. Community members worry that the resourcing of the flood risk

³ p10 Strengthening flood risk management and preparedness in Lancashire Overview and Scrutiny Review – November 2019

management team at the county council is insufficient to thoroughly scrutinise every application. There is also a concern that a conservative approach to risk, grounded in a lack of resources to respond to an appeal, means that fewer objections are lodged than might otherwise be made.

It would bring comfort to the community if progress was made on the requirement to build SUDs to an adoptable standard and to have them adopted. At the moment residents are often unconvinced of the quality of SUDs proposals and worried that ongoing maintenance will be properly undertaken. This matter was considered in further detail in the inquiry report.⁴

7. What lessons can be learned from the recent winter floods about the way Government and local authorities respond to flooding events?

It has to be recognised that flooding is devastating for each household and business and recognise that the households and business involved in small or isolated flood events require support. Currently these flood events are often overlooked in central government responses as the focus is on large scale events.

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<https://council.lancashire.gov.uk/documents/s162620/Appendix%201%20Report%20of%20the%20Strengthening%20Flood%20Risk%20Management%20and%20Preparedness%20Task%20and%20Finish%20Group.pdf>

⁴ pp11-13, Strengthening flood risk management and preparedness in Lancashire Overview and Scrutiny Review – November 2019

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