

Written evidence submitted by The Caterham flood Action Group (FLO0013)

Introduction

We, the Caterham Flood Action Group (FLAG), represent flood victims of Caterham on the Hill, Chaldon and Old Coulsdon, where 121 homes (of the 350 at risk) suffered terribly in the devastating floods of June 2016.

We are affiliated to the National Flood Forum (NFF) and hold regular Multi-agency Meetings (MAM) with the Risk Management Authorities (those being, Surrey County Council (SCC - as LLFA), Tandridge District Council (TDC - as LPA), the London Borough of Croydon (LBC - as LLFA & LPA), Thames Water, The Environment Agency and City of London Corporation). Our most recent virtual MAM took place on 24th April '20.

Our goal to find a long-term solution to this man-made flood risk.

Our Catchment falls within steep sided valleys, decades of cumulative overdevelopment, non-maintenance of the surface water drainage infrastructure, no investment/upgrade of the foul drainage infrastructure to suit development, population growth or climate change and failure to manage the flood risk, simply means that when it rains, we're at risk of foul flooding... in the 21st century and it's absolutely disgusting.

We have participated in many consultations on all things flood related and to be perfectly honest, they are getting rather repetitive.

"Insanity is doing the same thing over and over again but expecting different results".

The Pitt review came up with the solutions many years ago, why then are we still debating this issue?

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69489/2012-01-31-pb13705-pitt-review-progress.pdf

And if all but two of the recommendations (92 in total) were taken forward (in 2012), why are we no closer to managing the flood risk in this country?

For the record, the Caterham FLAG are participating in the collaborative learning project, commissioned by the Environment Agency, undertaken by Icarus.

One-to-one interviews have been carried out by Ute Kelly (Lecturer in Peace Studies at the University of Bradford), her information could be useful to this inquiry.

Why re-invent the wheel each time? To save time, and time equals money, join up of EA departments would be most beneficial.

Prior to the Covid-19 emergency, the UK was flooded, it will do so again... the virus has not reduced the flood risk.

Lessons must be learned, and the government needs to listen to communities, we need a common-sense approach to managing the flood risk, of course some tough decisions might need to be made and some money spent.

Fractured responsibility has left the country at risk from the elements, it's time for one single point of accountability, failure to do so, will only result in another expensive inquiry in another Eight years!

We appreciate this opportunity (trust you will listen... this time), so in response to this latest inquiry...

[Please note our skill set and response refers to surface water flooding (often overlooked) and foul flooding (appalling dismissed)].

Terms of reference

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

NO.

1.1, In this catchment some residents have been flooded four times in twenty years, their voices were not considered relevant until the NFF intervened. Each RMA had blamed the other, for whoever accepted responsibility, paid for it, we the public were routinely ignored.

After four years we're finally making progress, but it has been painfully slow (nb uncertainty regarding funding now abounds due to this current dilemma and the financial impact of covid-19 on the economy).

SCC is far more proactive than LBC, yet Croydon is the fourth worst area in England and Wales for surface water flooding, therefore the LLFA, should in theory be working far harder to manage that risk. Regional variations in LLFA expertise (resources and/or skill set), has created a flood risk lottery.

Political prioritisation leaves many residents in 'safe seats' neglected if their views don't align with the 'governing' party.

For example, Old Coulsdon falls in Croydon South, a Tory stronghold, LBC is a Labour council. Whereas residents on Caterham on the Hill (the most densely populated area in Surrey) voted for the Lib Dems, Surrey being governed by the conservatives.

Regardless of how one votes, no-one should suffer repeat foul flooding.

Fractured responsibility only serves to increase the flood risk. We need ONE accountable non-partisan authority.

1.2, There is no 'join up', a total lack of coordination and communication, emails vanish into the black hole of the public sector.

Procrastination is a convenient local government tool to ensure the public, give up and 'clear off', the private sector could not possibly operate with such inefficiency.

We are powerless to complain about this breakdown in communication, we the public have no means of redress, for the councils are 'supposed' to be self-regulating (tax payers wouldn't have been flooded with sewage for two decades if someone at the top was accountable).

To reiterate, we need one single point of accountability, that manages the flood risk from ALL sources. At present all floods are equal, but some are more equal than others, surface water flooding just doesn't seem to count, leaving victims devastated by the impact but also frustrated at the lack of acknowledgement and action taken to protect them from repeat. Recent dialogue at the MAM reinforces this, the Flood Risk Maps that count are the ones for Coastal and River Flooding, in which groundwater is an important but incomplete element.

Consider too, how safe is it to stay at home... Self-isolating with 3' of sewage?

1.3, There is far too much information, in different places and in fact what is online is contradictory. Our catchment is at high risk of surface water flooding BUT no risk on the planning maps.

We need a one stop shop, for residents, developers, planners etc... does this place flood, YES or NO, simples.

And flood zone classifications should reflect this risk, regardless of the source.

Language used is not clear, 1:100 doesn't mean you won't flood for another 99 years, two storms of this severity can occur in one weekend. Percentages are not helpfully either because if your house floods, it does so 100% not 0.001%.

A common-sense approach is required to ensure the public are aware and can comprehend the risk they might be in.

1.4, EA flood maps are incomplete, we have many subterranean rivers in the local area, Bournes that rise approximately every seven years, locals know of them but their omission on the internet, renders us powerless to challenge inappropriate planning applications.

Only recently we were on a groundwater flood alert, this renders SuDS completely useless (the superficial layer of clay here, does little to improve SuDS functionality). Flood risk maps must represent the catchment in reality, when evidence is presented to the EA, this should be incorporated once verified.

In our recent MAM, LBC as LLFA, admitted confusion, due to the sheer amount of information, and the disingenuous developer knows this, leaving us the public, without expert advice, unable to respond to planning applications.

1.5, The developer pays for the Flood Risk Assessment (FRA), so it's hardly going to be truthful... An independent body should be providing these reports (the developer paying for facts not fiction that steers the application through the planning system).

1.6, Planning policy is not protecting us from repeat foul flooding, where it could, a lack of expertise in planning departments and massive workloads, guarantees policy is not implemented, huge staff turnovers and lack of continuity, ensures no knowledge build up and regrettably local historic knowledge is ignored.

Building control don't have the powers to ensure SuDS are installed as per application, more often than not these have been watered down along the way and discharged as conditions, a developer isn't going to eat into profit if they don't have to.

1.7, Cumulative development is not addressed here, and should an application be dismissed, the developer has the right to appeal. Then a dry desk based assessment in Bristol, makes the decision about our 'place', we therefore have no control in shaping the place we call community for, to reiterate, technically, on paper we are not at risk of flooding.

Our only option to challenge these terrible planning decisions are call-in (which is seldom successful as the LPA are 'deemed' to be responsible for implementing policy), the LGO, which takes far too long by which time the building is up (and under water) or Judicial Review... which is restrictive purely on finances.

We the public have no champion that represents us, who works for the collective good of the community, that seeks to provide betterment, that manages the flood risk and outcome.

1.8, Riparian ownership, management and maintenance... utter fiasco!

We have a culvert that runs under hundreds of homes, most are not aware of it and cannot see the 'in' or 'out', how on earth can they know if its blocked? Or be expected to clean it when there is no means of access? The top of this culvert (which failed in June 2016) lies in SCC, the bottom, in LBC.

Potentially the residents who flooded could end up with a nasty bill to maintain an asset they do not know about.

Ditches are 'expected' to be cleared by landowners, who often fail to do so, resulting in flooding downstream, yet the LLFA appear powerless to insist maintenance be carried out.

Rules and guidelines are unclear, this issue needs addressing, riparian law needs updating.

1.9, In short, National government does not support Local government, who in turn are failing local people.

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

2.1, There is a focus on incident management, the EA cannot be faulted for the response to the flooding of Feb 2020, staff worked tirelessly to protect communities, but there appears to be an absence of support for long term recovery.

Press coverage left, those affected and relocated to hotels, where sent packing when these establishments closed (due to covid-19). Flood victims are now back in inhospitable homes, self-isolating. Rapidly forgotten when another emergency descends.

And perhaps had the authorities listened to local fears and addressed concerns before the event, the financial impact would not have been quite so great.

A proactive response to managing the risk could have protected residents better (Grenfell being a prime example).

2.2, As previously stated, the focus is on fluvial flooding incidents, where there are concentrations of flooded properties at the expense of more dispersed, but often greater numbers, from pluvial flooding (a hidden issue).

The EA has responsibilities for main river flooding, but not flooding from ordinary watercourses and pluvial flooding, it is such a shame water is not aware of these rules, when cascading through our homes.

Hence, we need one accountable overseeing authority, who can instruct the local stake holders accordingly.

We need surface water flooding to be on the agenda, at present the government is failing residents.

The Government warning strap line 'Prepare, act, survive', is not applicable to pluvial situations. It is a wasted message for a large percentage of homeowners at risk.

2.3, It's time to listen to communities, involve them... descending upon the situation, to manage the immediate flood risk, then leaving again, is not a collaborative exercise that helps a community adapt.

2.4, If only the response to flood emergencies were as thorough as the Government's covid-19 response, we would not have had to wait two decades for help!

The Government have all the reports, please act.

3. Given the challenge posed by climate change, what should be the Government's aims and priorities in national flood risk policy, and what level of investment will be required in future in order to achieve this?

3.1, Regional rainfall predictions must address surface water flood risk as opposed to one random percentage applied across the land.

3.2, Great care must be taken to ensure climate change does not just become a convenient excuse for doing nothing. We cannot continue to build homes at risk (and that is the families, not just the bricks and mortar), then blame the floods that destroy on Climate change, that is simply irresponsible.

Planning policy must ensure homes are safe, the developer cannot build knowing the risks without taking any responsibility, making profit yet offering no guarantee.

If builders were accountable, they would not be proposing most of these schemes, yet this is what the 'customer' expects, one's largest purchase has no guarantee against flooding.

I have more rights to complain and request a refund when buying a pair of socks!

3.3, A catchment-based approach to manage flooding must be implemented, that includes the Pluvial risk.

3.4, The South East is predicted to run out of water in 25 years, the chalk aquifers under our homes must be protected from contamination (the repeat foul flooding and discharge to ground via deep bore soak away's in a GSPZ must be Investigated and addressed) and replenished, surface water must be directed underground, as opposed to inundating foul drains (resulting in hydraulic is flooding).

To avoid drought, we need water BUT in the right place and that is not our front rooms!

The irony is, we could be flooded whilst on a hose pipe ban.

3.5, The right to connect surface water to foul drains must end, Climate change will see increased rainfall with that comes additional foul flood events in Surrey and Greater London... in a 'civilised' country.

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

4.1, People and communities should be automatically considered as equal partners in flood risk management. Our local knowledge must be valued.

4.2, The authorities must acknowledge that not all those at risk are in a position to make their voices heard, the vulnerable and disadvantaged are possibly at the greatest risk, unable to pay for insurance or 'build back better'.

Data protection renders volunteer organisations powerless to assist these members of our community, hence we need an accountable organisation, acting on our behalf.

4.3, As mentioned, our community action group have participated in many inquiries, investing countless unpaid hours in debate. We have asked DEFRA and MHCLG questions regarding policy, many months later, we are waiting for a response.

The Planning system in the UK is broken, driven purely by numbers and profit, as opposed to people and their needs.

Ironically, Covid-19 could be put to good use here, killing two birds with one stone, blocks of tiny flats without gardens or units considered 'shared amenities', essentially vertical slums of the future, should be avoided.

The importance of green space on mental health (whilst also being really useful for managing the flood risk, making space for water) has been proven over these last six weeks. The NPPF needs to be rewritten to deliver sustainable development as opposed to the presumption in favour of development, regardless of the consequences.

4.4, The Caterham FLAG was chosen as a pilot location for the collaborative learning project, collaborative however works both ways, the voice of the public has to go up the command chain... and policy changed.

4.5, Findings from the NFCERM strategy (a consultation the Caterham FLAG also participated in), must have an impact on the NPPF.

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, NFM can be utilised in our catchment on what remaining green space we have, only if these precious pockets of land are protected.

5.2, Our flood risk is manmade, we need a holistic approach, that includes NFM as part of the solution. Retro fitting SuDS and enforcing strong planning policy also required.

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, Cumulative development, urban creep is increasing flood risk downstream, the foul flooding cannot be reduced by further additions, year after year.

The drainage Infrastructure must support development, population growth and climate change.

6.2, Buildings have potential to be more resilient, people living at risk cannot become so. Mental health is often overlooked, being ignored has an even greater negative impact on personal resilience. The fear of development equals the fear of flooding.

6.3, Most development is not on the flood plain and most flood risk is pluvial, which the EA are not involved in, failings regularly occur at every stage of the delivery of planning policy.

6.4, The NPPF and associated guidance need strengthening to better take account of current and future flood risks.

6.5, FRAs funded by the developer carried out by the LLFA, would ensure that they are of a consistent standard, that they collectively build a better picture of flood risk in an area and to help build capacity in LLFAs.

6.5, PFR cannot be relied upon, it does not manage the flood risk.

If all the homes at risk here today are offered PFR, without any other Flood alleviation scheme, in ten years the depth of human excrement flowing down our streets will be considerably deeper, putting a greater number at risk and overtopping any flood defences.

6.6, SuDS on clay are as useful as a chocolate teapot. We need innovative designs to manage surface water on sites.

6.7, Regional planning committees should be created to ensure local knowledge is addressed and appeals should be considered locally, Bristol should only be considering planning decisions in... Bristol!

Conclusion/solution.

One accountable non-partisan flood authority.