

Introduction

1. The NFU represents 55,000 members in England and Wales, involved in 46,000 farming businesses. In addition, we have 55,000 countryside members with an interest in farming and the countryside. We welcome the opportunity to respond to the EFRA Committee inquiry on Flooding. Given our members interests, we have chosen to respond to the Committee's questions from an agricultural perspective.

Executive Summary

2. In brief, the NFU's response outlines the main impacts flooding has on agriculture and sets out how successful future adaptation to the increased risks from climate change are needed to increase the resilience of the agriculture sector.

Withdrawal of Maintenance

3. The NFU would like to encourage the Environment Agency (EA) to follow their own protocol - 'Protocol for the maintenance of flood and coastal risk management assets'¹ - when it comes to the withdrawal, or in some cases, abandonment of flood defence assets. It is essential that early (average notice is 6-months²) and open discussions are held with those that may be affected and that the EA is clear from the outset of its intentions and clear and consistent terminology is used.

Natural Flood Management (NFM)

4. We acknowledge that farming does have a role and is keen to play its part when it comes to NFM. Given the contribution such actions would make to flood management – often these actions are long term or permanent service provisions – they should be rewarded on a similar basis. However, there remains a lack of clarity around responsibility or liability and sustained support to landowners and farmers who agree to the implementation of NFM features/schemes after either the short-term funding for the scheme ends or interest fades.
5. The NFU recognises that there are benefits to NFM, but it must also be recognised that it cannot be considered as the only solution to flood risk reduction or flood storage within a 'place'. Often a combination of both hard defences and nature-based solutions are required. In addition, whilst NFM has its place in reducing the risk of flooding, it is critical that communities understand its limited function during extreme weather events, something we are experiencing more often.
6. Ultimately, NFM must sit within a robustly evidenced catchment-wide flood mitigation plan that accounts for the physical, land management, economic and environmental features and assets of the catchment. This must remain at the forefront of the EA's mind when considering potential flood management options. Furthermore, the EA must engage at the earliest opportunity, and fully, with rural communities and farmers in helping to identify the best solutions to address flood management.

Future Environmental Land Management Schemes (ELMs)

7. Within the new Environmental Land Management scheme (ELMs) there is potential for appropriate NFM funding for farmers and landowners, but the basis of payment within the new tiers is not yet resolved. There is great potential for a scheme that 'stacks' environmental service provision for a

¹ <http://eastdonylandpc.co.uk/wp-content/uploads/2016/07/EA-Maintenance-protocol.pdf>

² <https://www.gov.uk/guidance/flood-and-sea-defences-when-maintenance-stops>

number of complementary outputs, if the scheme and reward structure is designed to permit such an outcome. However, as ELMs is still being planned and assessed there needs to be complete engagement with the agricultural sector to ensure that the options available are the right ones.

8. The NFU believes that further evidence and guidance is required as to how a new ELM scheme will contribute to farmers and landowners who are at risk from flooding and coastal erosion.

Sustainable Drainage Systems

9. The NFU understands the need to manage flood events and that Sustainable Drainage Systems (SuDS) can help to manage surface water flooding. However, adequate funding and clear guidance associated with the maintenance and liability of a SuDS scheme are required. Transparent discussions with farmers and landowners who will be impacted are essential prior to a decision being made.

NFU Response

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

10. During a flood event in a predominantly agricultural area, we believe that it would be extremely useful if organisations, like the NFU, were included in the Local Resilience Forum (LRF) discussions as we have the communication platform to provide support which would be beneficial both to our members and the LRF. Our members can also relay essential local knowledge and provide, if required, additional resource. By way of an example; after the NFU's work to help North Yorkshire County Council during the Summer 2019 floods, members of staff from the NFU's North East Team were invited to join the North Yorkshire LRF during the Lower Aire (East Cowick and Snaith) floods this spring.
11. Co-ordination of the risk management is largely effective, but in some cases, we have examples where there seems to be a distinct disconnect between some Lead Local Flood Authorities (LLFAs), the EA and other Risk Management Authorities (RMA) during an incident. Often miscommunications can lead to pumps being withdrawn from use, when they could be utilised elsewhere.
12. Within the EA, there has been some cases of variations in the interpretations of guidance/regulations from local to regional and even national level, this albeit not widespread, can be hugely unhelpful and confusing for our farming members.
13. Effective co-ordination is key when managing the response to a flood event and can achieve much better results. Coordination between LLFAs is critical when events cross numerous boundaries and can be challenging. Coordination between all LRFs is also critical, both during the incident, recovery and review. There is a potential argument here for a single regional resilience body that includes flooding in its remit.
14. The sharing of data (e.g. satellite imagery, potential flood impact areas etc.) between all actors could be improved to ensure all RMAs and partners understand how flood assets operate and where water may be diverted to should a decision be made. This will also help RMAs plan for dealing with an event.

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

15. The main problem that communities across the country face after a flood event is that they are often forgotten about by the public and the media before the floodwater has fully receded. Funding after
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an event is provided on an ad-hoc basis with no joined-up thinking or long-term maintenance plans in place. Most flood funding is on capital projects not maintenance. The lack of investment to maintain flood defence assets is coming to light as we are seeing numerous breaches of flood embankments. For example, in the last few months the Wainfleet Relief Channel on River Steeping (in June 2019), Dorrington Catchwater (First week of October 2019) and Barlings Eau, East of Lincoln (9 November 2019) all failed due to breaches which led to thousands of acres of agricultural land being flooded. Additionally, there are also countless other examples of overtopping as a result of a lack of main river maintenance; predominantly caused by in-channel silt, vegetation and trees restricting the conveyance resulting unprecedented levels and then overtopping.

16. Flooding is a hugely contentious, public-focused problem that we are experiencing more frequently. The government must listen to local communities, farmers and landowners from the outset on the nature of the flooding problem in order to find sustainable solutions. Local communities are very infrequently listened to, but rather agencies repair the problems as they arise, rather than invest in maintenance of flood risk assets and watercourses in anticipation of problems (and mindful that pressure on these assets will only increase with climate change).

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?

17. The EA's Long-Term Investment Scenarios (LTIS) 2019³ states that £1.1 billion of annual investment is required to provide protection and resilience from flooding in England. The Government proposes to spend £5.2 billion on capital projects over six years between 2021 and 2027 to reduce the risk of flooding to 336,000 homes and non-residential properties. According to EA modelling, this is projected to reduce national flood risk by up to 11% by 2027. During the previous six-year period up to 2021 the Government has invested £2.6 billion in capital projects to reduce the risk of flooding to 300,000 homes across England. The weighting of the awarding of the funding is heavily granted towards protecting people and property and disregards high-value agricultural land. Therefore, using the Government's own data there is not adequate funding available to counter the impacts of future flooding.
18. Agriculture is often at the mercy of extreme and changeable weather, whilst at the same time, it is viewed by some as the solution to many flooding problems. Whilst current funding prioritises concentrations of people and property, farmers experience a lack of maintenance of watercourses and coastal channels and reduced maintenance of banks and flood defence assets. The result is more frequent, more extensive and longer duration flooding events. Without insurance cover for their losses, farming businesses are being put under increased financial pressures after each flood event. At the same time, they are being asked to take more and more land out of production (with extremely limited reward, if any) to reduce flood risk elsewhere.
19. This is an unsustainable and inequitable outcome, which causes damage to farming businesses and rural communities. Furthermore, it is unreasonable that communities that are afforded little protection from flood funding are the same communities that are asked to implement measures and make significant change to benefit others. Therefore, we ask that the Government's approach to the allocation of flood risk management funding, should prioritise the nation's food security and therefore agricultural land alongside people and property.
20. Flooding and water management in river and coastal areas must be properly funded to protect urban and rural businesses, infrastructure and communities. Government spending must be transparent, and the artificial distinction between capital and maintenance expenditure removed. The NFU recognises that the total amount of funding available for flood risk management has increased, with budgets confirmed until 2021. Between 2016 and 2019 there was an increase of

³ <https://www.nfuonline.com/cross-sector/environment/water/flooding/ea-release-flooding-scenarios-report/>

more than £100m in the annual funding available for the installation of new flood defences and the importance of maintaining existing defences must stay at the forefront of the Government's flood risk management strategy. However, very little of it went to protecting rural communities or agricultural businesses.

21. Currently, adequate funding is not available and we recognise that money from other sources (private or through levies) may be required. However, the Government will need to work with stakeholders to develop this potential flood defence funding plan.
22. Careful consideration with planning and flood risk modelling would be required if there was a direction to encourage businesses to protect their own assets. This could result in unintended consequences and possible displacement of flood water. For example, businesses who have the capital to be able to afford to build their own flood defence protection, could then displace that flood water to either a completely different area or, more likely, onto agricultural land. The amount of flood defences that would be required in some areas would not be affordable to the majority of farmers and landowners. Therefore, we fear that adequate strategic planning would need to be in place to assess the potential flood risk exacerbation if increased large business (asset or property level) protection rises and a mechanism to compensate those impacted.

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

23. The NFU should be invited to participate in the Local Resilience Forum, or at least should be invited to dial in during an incident. Farmers are often equipped and willing to assist. They are also knowledgeable about the local hydrological regimes and can provide essential information that may help reduce risks during an event. The NFU can also provide details of the potential number of impacted farming business and an idea of the types of vulnerable business (livestock) within an affected area.
24. Additionally, public confidence will be strengthened if the EA's withdrawal of maintenance procedure is adhered to in full and the reason for the withdrawal of maintenance is clearly conveyed. The protocol, which needs to be published on .GOV, will only be successful if the EA informs and works with landowners/farmers from the outset. Consistent and open discussions about the potential withdrawal of maintenance will help to instil confidence in farmers, landowners and members of the public.
25. Flood risk management projects that will actively impact landowners, either with natural or traditional structures, must include active consultation and the input of their knowledge into modelling work. Schemes must also look at the full life costs of the project upon the whole farming business and payments made accordingly (a compulsory purchase order rather than just compensation must be offered).

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?

26. The NFU recognises the increased focus on 'nature-based solutions', arguably since the EU's Sustainable Development Goals (SDGs) were published in 2015 which stated that natural solutions should be utilised to address flood risk problems. Natural Flood Management (NFM) is being increasingly implemented in catchments across the country because it is seen as a cheap solution compared with a hard-engineered or hybrid (i.e. a combination of natural and engineered solutions) projects. This is often due to the scheme not being able to achieve Flood Defence Grant in Aid (FDGiA) because of the stringent cost-benefit analysis which often leaves rural communities at risk. However, there remains a lack of clarity and support to landowners and farmers who agree to the implementation of NFM features/schemes after either the short-term funding for the scheme ends or
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local interest fades. In some cases, this leaves a single individual with the sole liability and responsibility of the feature/scheme which can lead to a plethora of issues to that individual, both financially and personally (for example stress/anxiety caused by potential feature failure).

27. NFM should be regarded as a public good; costs and risk should be shared by the beneficiaries/society on a full cost basis and not income foregone. Whilst the NFU recognises that there are benefits and that we are part of the solution and have a role to play when it comes to flood risk management, especially with regards to NFM, it must also be recognised that NFM cannot be considered alone, as the solution to flood risk. Catchment context must remain at the forefront of any decision making when considering potential flood management options.
 28. Farmers across the country already play an active role in reducing flood and coastal management. This is through the continued maintenance of thousands of kilometres of river network for conveyance and the environment, and where appropriate, proactive engagement in NFM schemes.
 29. The NFU recognises that NFM techniques, in the right location, can have a role, but they are not the universal panacea. Instead they should only be used as part of a cohesive and carefully planned package of measures across the catchment such as maintenance and de-silting, looking at upstream attenuation and downstream conveyance to address shorter- and longer-term flood risk.
 30. Special consideration needs to be given to the following:
 - The need to actively and fully consult, engage and seek agreement with land managers, especially farmers, to ensure schemes can work alongside other land uses, including agriculture and food production.
 - NFM measures bring their own suite of management and maintenance issues that need to be addressed in any scheme's development and **long-term** flood risk management resource planning.
 - A clear functional remit for all NFM measures should be established, including any measures should the site attract species of designation. As such, an automatic assumption to duplicate the initial NFM measure cannot be guaranteed.
 - Where NFM techniques are implemented, suitable financial support and incentives should exist.
 - Agri-environment schemes (existing and future) are unlikely to be the best funding vehicle, particularly for bespoke, longer-term schemes or areas of lowland water storage; funding mechanisms need to truly value the flood mitigation services provided over decades rather than years.
 - NFM will come in a variety of forms, some may be compatible with food production (no till arable, cross slope buffer strips) but other approaches (washlands, woodland planting), longer-term NFM (10 years plus) need distinct funding through EA source, not Defra.
 - Any NFM measures must work for both the landowner and tenant(s).
 - NFM techniques could be implemented on farms and have a role in catchment wide flood risk reduction. But these measures must meet minimum defence resilience thresholds to provide the protection needed. Further research is needed to develop funding and implementation.
 31. As outlined within the NFU's Flooding Manifesto (2017)⁴, where agricultural land is part of the solution to flooding as part of total catchment management, such as NFM or designated flood water storage areas, this must be planned, agreed and paid for in advance at commercial prices.
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32. Defra recently pledged £15m to help better understand NFM and its potential to alleviate flood risk management. However, it is important to consider that these projects were only awarded funding 2.5 years ago⁵. Therefore, there will only be a very short period of monitoring to assess the potential flood risk attenuation of these projects or any unintended consequences. Furthermore, catchment context is a hugely important consideration when it comes to NFM as what appeared to be successful in one catchment will not necessarily have the same effect elsewhere due to differing geology, land-use practices, soil type etc. The NFU would urge all involved parties to consider these aspects within their review of the Defra funded NFM projects.

Environmental Land Management schemes (ELMs)

33. NFM services offered by farm businesses would, in some cases, make a very considerable saving for the wider economy. However, before decisions are made on the sourcing of funding for NFM, it is necessary to clearly identify the range of techniques that could be provided. The NFU currently sits on the steering group for CIRIAs NFM project which has been commissioned by the EA. Unfortunately, financial constrictions may not allow the required suite of NFM tools to be covered. Within the new Environmental Land Management scheme (ELMs) there is potential for appropriate NFM funding for farmers and landowners. However, as ELMs is still being planned and assessed there needs to be complete engagement with the agricultural sector to ensure that the options available are the right ones. Countryside Stewardship (CS) schemes provide farmers and landowners with funding for some NFM options⁶. However, there has not been a great uptake in these due to the high levels of risk associated with taking part. The CS options are 5 or 10 years in length. The payments do not take into account what happens after this period e.g. replacing a dam or structure that will inevitably have a short life span due to the use of natural materials e.g. wood. There is also no cover or support when it comes to the liabilities associated with NFM structures or schemes – the liability falls to the landowner as the riparian owner. Therefore, if an NFM feature did fail, leading to increased flood risk downstream the liability is that of the landowner. The CS scheme also does not consider opportunity costs of creating a new habitat from which you cannot return to conventional farming. These are all lessons learned that the Government should carefully consider whilst developing the new ELMs.

34. NFM measures that see long term diversions of land management into non-food use will need to sit in Tier 3 of ELMs, at least. Preferably, FCERM funding will be used to support this for the public good that is being provided and not fall solely on the ELMs budget. However, short term more ephemeral measures like soil management would be suited to be funded as part of Tier 1 or 2.

35. NFM projects that have received funding from other sources e.g. a Rivers Trust usually have successful implementation (e.g. the Haltwhistle Burn project⁷) but interest of those initially involved usually dissipates once the scheme has been built. Often the funding is purely for the capital works and not for maintenance. We are at the point now where many NFM schemes have been in place for a few years and will need essential maintenance, without prior agreement the likelihood is that this essential and ongoing maintenance will have to be carried out by the landowner, whom the scheme probably benefits the least.

36. In brief the NFU would like to highlight these main points:

- Farmers have a clear role to play in flood risk management – but this requires proper planning across the catchment as opposed to a piecemeal approach.

⁴ <https://www.nfuonline.com/flooding-manifesto-jan-17-final-online/>

⁵ <https://www.gov.uk/government/news/schemes-across-the-country-to-receive-15-million-of-natural-flood-management-funding>

⁶ https://www.gov.uk/countryside-stewardship-grants?land_use%5B%5D=flood-risk

⁷ <http://research.ncl.ac.uk/haltwhistleburn/>

- There is a need to properly incentivise farmers and landowners beyond the simple calculation of income forgone given the public goods that will be delivered.
- The fact NFM is a long-term undertaking so both ongoing maintenance and liability need to be factored into any ELMs scheme design.
- Flood storage and ongoing maintenance may go well beyond the typical length of an agreement. This must be factored in; ELMs for flood risk management will involve long-term and sustainable changes as opposed to quick fixes. Long-term measures should be funded from the FCERM budget.

Beavers & Flood Risk Management

37. Recent calls for the release of beavers within catchments in England are often associated with their alleged flood reduction benefits. However, the quantifiable evidence into the flood mitigation generated from beaver habitats in England and Wales is extremely limited, with recent studies not considering basic hydrological routing effects when considering the flood peak reduction in a reach.
38. Beavers are herbivores and are best known for building dams in watercourses, creating large pond-like reservoirs. The mammals use woody material to construct their dams and are considered pioneers in dam engineering⁸. However, these dams can cause a plethora of flood risk hazards which means that location, especially catchment context, is an essential consideration when contemplating the release of beavers within an area.
39. The risks could also far outweigh the benefits as beavers are renowned for sporadically ‘breaking’ or destroying, their dams. If a dam break were to occur during a peak event the dam-construction material would end up being transported downstream and could lead to blockages within culverts and under bridges; further exacerbating the flood risk e.g. the Devon beaver trial⁹ where 55 dams were originally constructed. Of these, there are only 26 in place now.
40. The NFU has serious concerns about the impact of beavers on agricultural land. Beavers can block land drains leading to the wetting up of productive land leading to losses in productivity e.g. Tayside, Scotland. They can also impact on maintenance of riverbanks, increasing the flood risk.

Overall Impact of Flooding on Farming

41. Furthermore, the importance and contribution of our food and farming sectors to the economy must not be overlooked; some of our most productive and highest value agricultural land (60%) is in the floodplain or coastal regions that are vulnerable to flooding, and deserves to be protected.
42. In order to ensure that adequate flood risk management can be enacted and delivered, actions and measures to address flood risk must be properly funded and the allocation for any funding must be transparent.
43. The NFU would welcome the opportunity for Risk Management Authorities (RMA) to work with our farmer and grower members to help identify opportunities for utilising farming practices to manage flooding whilst ensuring farm-business profitability. The discussion will need to take place before a decision is made by any RMA, as this will not only allow farmers to provide essential local information but it will also allow farmers to plan and adapt their farming business in advance so the impacts are minimal. Discussions with our members must be open and transparent for this measure to succeed. There is already a plethora of environmental and flood risk activities licences and permits that our farmer and grower members have to consider, for the achievability of a scheme it is important to ensure that the impacts of these regulations to our members is as minimal as possible.

⁸ <https://phys.org/news/2018-05-beavers-good-reveals.html>

⁹ <https://www.sciencedirect.com/science/article/pii/S0269749105000540>

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

44. The NFU welcomed the fact that the Government committed to an infrastructure first approach to development in its Election Manifesto through the planning system. Recent events have proven the need to ensure both urban and rural areas can accommodate robust and future proof drainage solutions. This is clearly needed for water infrastructure and for new development to be carried out in line with Schedule 3 of the Flood and Water Management Act 2010. Especially the need for local authorities to adopt and maintain systems. The NFU would stress how important it is for compliance with the Act to be foremost and with any additional potential benefits from nature-based solutions to be then added.
45. There needs to be an accelerated programme of water treatment works and urban area upgrades to systems some of which were developed over a hundred years ago. All drainage and sewage systems need to accommodate new development and cope with existing development pressure inherited from where smaller housing developments, replacement business units and car parks have been approved with drainage direct to the system. We now are witnessing additional pressures being created by climate changes, such as more intense and frequent rainfall events and more frequent flooding of properties, businesses, and land with polluted water from drains as well as from rivers. This increases the potential for pollution from these properties as well as increasing their clean-up costs after flush events.
46. The NFU calls for call for planning guidance that requires run-off neutral developments. As well as building regulations and requirements that are designed to capture more water around retail and industrial buildings. Simple measures such as grey water recycling and water butts can all help. Building regulations could also be upgraded to help achieve cleaner water targets and to reduce wastewater as well as energy efficiency. The planning system can only go so far, there also needs to be a catch-up and focus on retrofitting homes with water reduction and water quality management features. The Government could also focus support, such as grant aiding domestic improvements, to help low income families and single, often older, one person households in rural as well as urban areas, where the costs could otherwise be prohibitive.
47. Cumulative run-off pressures from planning development can also go under the radar. One clear example is that large areas of suburbia have been often been hard surfaced, with runoff direct to the drain, as front gardens are replaced by car parking using permitted development rights¹⁰. In theory those permitted development rights require hardstanding over 5 meters to either be made of more porous materials or provide direct run off to permeable or porous areas within the curtilage of the dwelling-house. In practice they are often not enforced.
48. The Coronavirus outbreak has highlighted is the need for safe open green space in urban areas and where people live so they are not forced to travel to less polluted places to take exercise. There should be an opportunity to connect measures to improve water quality and provide areas that complement open spaces and places people that can enjoy. This means capturing water more locally and ensuring water treatments are robust enough to ensure contamination does not continue.

Water Infrastructure

49. As aforementioned, the Government itself has identified the clear need for water infrastructure (designed to manage water risks and resource e.g. ambitious flood storage schemes, innovative water resource projects) that are fit for the future. Water infrastructure is desperately needed across the country that adequately considers the risks from water as a hazard and as a resource.

¹⁰ <http://www.legislation.gov.uk/ukxi/2015/596/schedule/2/part/1/crossheading/class-f-hard-surfaces-incidental-to-the-enjoyment-of-a-dwellinghouse/made>

Sustainable Drainage Systems (SuDS)

50. The NFU would emphasise the need for green spaces, incorporating water pollution reduction methods to be developed as part of the planning approvals they support. Measures should be self-contained and demonstrate that they will not impact on farmland or field drains. This can be an issue in urban fringe area, including Green Belts, where farmland can already be affected by uncontrolled water pollution and flooding. Providing Sustainable Drainage Systems (SuDs) within safe open spaces and wildlife footpath corridors; and swales within car parks and adjacent to highway improvement junctions; helps ensure maintenance can be carried out promptly and additional costs are not passed onto the adjacent landowners.
51. SuDs, and other nature-based solutions to flood risk management, are being increasingly favoured due to their low-cost implementation and the lack of achievable flood defence funding from central government due to the stringent and unrealistic cost-benefit criteria. The potential reduction of surface water flooding and water pollution from urban areas and transport from SuDS has been proven in the UK¹¹.
52. However, the large-scale uptake of SuDs remains a distant prospect pending commencement of Schedule 3 of the Flood and Water Management Act 2010¹² (provisions are commenced in Wales). Without this, the future of SuDS will be extremely limited as the pressures from increased surface runoff, flooding and the associated pollution on local authorities and water companies increases they are looking to SuDS as a cost-effective solution. But someone will have to pay the price, and without the implementation of Schedule 3 it will be the farmer or landowner. Farmers across the country are ready and willing to help alleviate the flood risk to communities but this should be in line with our asks in our Flooding Manifesto¹³ – plan, protect and pay. No longer should farmland be considered sacrificial especially as British Agriculture has more than proven its worth during the Covid-19 global pandemic.

Property Level Protection

53. Property level protection is being increasingly relied upon for flood risk management as it is low cost, most of which falls to the homeowner, unless a grant is obtained. However, cumulatively the costs can surmount that of a larger defence that could potentially not only protect homes, businesses and infrastructure but also agricultural land. One example of this could be the Wash Frontage in Eastern England. If the existing coastal defence was brought up to the same standards as the recently improved Wrangle Sea Bank, in line with projected sea level rise, the potential flood protection would extend for tens of kilometres in-land and would also go towards protecting some of the best and most versatile agricultural land in England.

May 2020

¹¹https://www.researchgate.net/profile/Petra_Schneider/post/how_will_one_go_about_in_comparing_the_construction_cost_of_SuDS_to_conventional_drainage/attachment/59d6398a79197b8077996c2c/AS:402343179898880@1472937497168/download/The-SuDS-Manual-C697.pdf

¹² <http://www.legislation.gov.uk/ukpga/2010/29/schedule/3>

¹³ <https://www.nfuonline.com/flooding-manifesto-jan-17-final-online/>
