

# Consultation Response Form

## Draft Flood & Coastal Erosion Risk Management National Strategy for England

We welcome your views on the Flood & Coastal Erosion Risk Management National Strategy for England. Please use this form if you are responding by email or post rather than online.

If you would like to respond online, please use this link: <https://consult.environment-agency.gov.uk/fcrm/national-strategy-public>

The consultation document and supporting evidence documents are also available using the link above. We would encourage you to read them. If you would like a hardcopy, please email us at [FCERMstrategy@environment-agency.gov.uk](mailto:FCERMstrategy@environment-agency.gov.uk) or write to us at the address provided in the 'Returning your response' section below.

Please complete the questions and where there is a free text field, give as much information as possible to support your answer.

### Returning your response

The consultation will run for 8 weeks from 9 May to 4 July 2019. Any responses we receive after this date will not be included in the analysis.

We would like you to use this form if you are not submitting your response online. You can return it by email to [FCERMstrategy@environment-agency.gov.uk](mailto:FCERMstrategy@environment-agency.gov.uk) using the heading 'FCERM National Strategy Consultation'.

Please also use this email address if you have any questions regarding this consultation.

Or post your completed form to:

FCERM National Strategy Consultation  
FCRM Strategy Team c/o Morena Staiano  
Environment Agency  
Horizon House  
Deanery Road  
Bristol  
BS1 5AH

### How we will use your information

We are running this consultation in accordance with our Privacy Notice. A copy of the Privacy Notice is provided at the end of this document and we would encourage you to read this.

The Environment Agency will look to make all responses received online via our consultation website publicly available during and after the consultation. We will not be publishing consultation responses which are received by email or post, unless you specifically tell us to do so.

We will not respond individually to responses. After the consultation has closed we will publish a summary of the responses on our website. We will not publish names of individuals who respond but we may publish the name of the organisation for those responses made on behalf of organisations.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

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## Section 1: About you

*To help us analyse the responses we receive we'd like to understand more about you and, if applicable, the type of organisation and business you represent.*

**Please tell us if you are responding as an individual or on behalf of an organisation or group:**  
(Please select one answer)

☒ Responding on behalf of an organisation or group (representing collective views)

**If you are representing collective views, please specify which organisation or group and what type it is, e.g. environmental group, business:**

Cambridgeshire County Council (CCC)

Please continue to the next page.

## Section 2: Introduction and setting the context

**Q1. To what extent do you agree with the vision: A nation ready for, and resilient to, flooding and coastal change - today, tomorrow and to the year 2100?** *(Please select one answer)*

- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

We consider that "A nation prepared for and resilient to flooding and coastal change" would be a better worded and therefore more memorable vision. The "today" and "tomorrow" element may be settling an unrealistic impression of the strategy since, as the National Strategy makes clear, we are neither resilient to flooding today or tomorrow.

While having a vision to 2100 is strongly supported, the strategy will not achieve this aim. The actions, which only take us up to 2030, would not in themselves be sufficient to enable this country to meet the vision given the threat of climate change and the scale of national policy and action change needed.

The following question relates to the strategic overview role of the Environment Agency. The relevant section within the draft strategy can be found on page 12.

**Q2. To what extent do you agree with the Environment Agency's proposed strategic overview role as set out in the chapter 'setting the context for the draft strategy'?** *(Please select one answer)*

- ☐ No agreement
- ☒ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☐ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

The strategy takes a different approach in setting out the Environment Agency (EA)'s role compared to other risk management authorities (RMAs) which leads to the section being misleading for communities/readers as explained in the following points.

The Environment Agency's strategic overview section (p12) does not explain what "operational" is in this context and the activities listed under operational make this ambiguous. The role of Lead Local Flood Authority (LLFAs) is a purely strategic one, it confers no operational functions in the sense that LLFAs operate any structures or make any decisions that affect flooding during an incident (LLFAs do not). The term "operational" is inappropriate in this context and we suggest it is changed, perhaps to "strategic responsibility" or "risk management responsibility".

The text about water companies needs improvement - we would suggest liaising with water companies to improve this paragraph.

Similarly, highways authorities are not responsible for all roadside ditches. This is only the case where the highway authority is also the landowner, which is not the case for the majority of highways (just as the EA is not the landowner for main rivers). Roadside ditches are generally the responsibility of the riparian owner i.e. the landowner adjacent to the highway. Lower tier authorities (i.e. district councils) retain permissive powers to undertake maintenance of roadside ditches.

It is also important to distinguish between the strategic role of RMAs and their emergency response role. The Civil Contingencies Act (CCA) was passed before the Flood and Water Management Act 2010 (FWMA) was drafted. It did not consider, nor does it specifically reference, flood risk management activities in assigning Category 1 responder roles other than for the Environment Agency. Upper tier authorities (county and unitary councils) do have a duty in the CCA to respond to emergencies and to fulfil certain roles (as do lower tier authorities), but these are not linked to their role as LLFAs. If an LLFA chose to delegate all of its functions under s13 of the FWMA the body to which it delegated them would not gain any responsibilities under the CCA. The reference to LLFAs being category 1 responders should therefore be amended.

Flood Risk Management Plans are referenced under LLFAs, but the EA has to prepare these as well.

The National Strategy must be more consistent in setting out RMA functions and more accurate about those functions. It is poor that there are errors and misleading statements in the basic descriptions of RMAs at this stage of our working relationships. CCC would recommend that partners are invited to draft the sections of the National Strategy relevant to their legal roles and functions - this would be a good example of partnership working.

## Section 3: Climate resilient places

*We are asking for views about all of the strategic objectives and measures, however please do not feel you must answer all of these questions. If you don't have views to share, please leave the question blank.*

**Q3a. To what extent do you agree with strategic objective 1.1: Between now and 2050 the nation will be resilient to future flood and coastal risks. Over the next year the Environment Agency will work with partners to explore and develop the concept of standards for flood and coastal resilience? (Please select one answer)**

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

This (the first sentence) is an ambitious objective that CCC would support. It is unclear why the second sentence is also included in the objective text, as the objective should not be predicated on the idea of generating standards. Having standards in policy is not the same as actually achieving resilience on the ground. The second sentence is more of a means to an end, except that it does not align with measure 1.1.2.

We are supportive of the idea of robust resilience standards and look to learn from approaches taken in other countries (e.g. Natalia Moudrak's presentation at the Flood and Coast Conference with regards to the standards in Canada). We would note that it will be challenging to implement, reach and maintain resilience standards unless current funding levels, funding models and mechanisms change. For example, if a standard of protection is determined how does this affect the LTIS work and required investment?

**Q3b. Please provide comments on the measures described under strategic objective 1.1, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 1.1 can be found on page 22 of the draft strategy document)*

Strategic objective 1.1 should be the defining objective of the strategy and therefore it should be stated that every measure in the strategy contributes to it. In order to deliver resilience by 2050, there needs to be a way of determining the risk and understanding the opportunities to manage these as well as setting a standard to aim for. The measures set out under this objective do not on their own deliver the objective. As the devil is in the detail, CCC would like to see and be consulted on a clear set of actions proposed to help deliver this objective and the others in the strategy.

A decision needs to be made about whether the EA will work with partners to explore and develop the concept of resilience standards over the next year (as in strategic objective 1.1) or by 2022 (measure 1.1.2) and the measure updated accordingly. The timings of this imply that the appraisal guidance might be complete before the resilience standard is finalised which would not enable the guidance to reflect the outcome of the standard.

Measure 1.1.1: The appraisal guidance also needs to account for the different costs and economies of scale in delivering different forms of flood risk management to ensure that all sources of flood risk can achieve the resilience standard. Surface water schemes are inherently hard to deliver and in order for resilience from flooding to be achieved national and local investment decisions need to take more account of surface water.

Measure 1.1.2: The statement "the EA will also develop a suite of national tools that can be used in combination to deliver flood and coastal resilience in places" should be its own measure with timescales.

**Q4a. To what extent do you agree with strategic objective 1.2: Between now and 2050 risk management authorities will help places plan and adapt to flooding and coastal change across a range of climate futures?** *(Please select one answer)*

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

Objective 1 and 2 are very similar and it might be helpful to combine them or elevate the status of objective 1 to make it sit above all other objectives.

**Q4b. Please provide comments on the measures described under strategic objective 1.2, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 1.2 can be found on page 26 of the draft strategy document)*

Agree with the measures, with the following comments:

With regards to measure 1.2.2, this is fine, but not enough is being done at present to promote the current picture and evidence. The evidence is already very strong. It does not matter how good the evidence is if it only talked about by scientists and if the details are not promoted enough to wider society.

It will be necessary to find methods by which adaptive measures can be tested / measured. At present it is not easy to quantitatively test surface water management or ordinary watercourse interventions.

Adaptive approaches should also feature in Flood Risk Management Plans for all RMAs.

**Q5a. To what extent do you agree with strategic objective 1.3: Between now and 2030 all those involved in managing water will embrace and embed adaptive approaches to enhance the resilience of our environment to future flooding and drought? *(Please select one answer)***

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable



**Please explain your answer:**

While the National Strategy is not an appropriate place to set objectives for water resource management there is a need for more emphasis in the strategy about holistic water management and delivery of multiple benefits as part of flood schemes. This should not just be left to 'working with natural processes' case studies to explain. A more integrated water approach was expected given that this best practise approach is becoming more mainstream and that one of the strategy working groups was called "putting water at the heart of decision making".

The content of this section is largely focussed on natural processes in flood risk management, there is little mention of water resources or water companies. The section text should ideally be strengthened as discussed in response to 5a.

Strengthening should include reference to sustainable drainage systems (SuDS), which are an ideal adaptive measure for flood risk management.

**Q5b. Please provide comments on the measures described under strategic objective 1.3, and tell us about any additional measures you think there should be, and who could implement them.**

Ideally MHCLG would also work with the EA on this so that measures can also be introduced to link holistic water management to planning.

The measures are not specific so it is not clear what exactly is intended to be delivered.

Measure 1.3.2: Is there an opportunity to work more closely with other parts of government on developing and updating agricultural policy as well as just working with farmers?

Measures 1.3.2: Agriculture is an important area in flood risk management. There are however many partners already working with farmers such as Catchment Partners, some water companies and Natural England. There is no sense in duplicating this work. Farmers will have adapted to working with the organisations already leading in this field, so a partnership approach to flood risk management liaison would be better than the EA starting afresh.

New measures:

- From 2020 all RMAs will promote water as a resource
- By 2026 FRMPs and RBMPs will be joined up and all RMAs will address and manage water as a resource in their flood risk management strategies and in the delivery of their work.
- The EA and other RMAs will work together with other professional organisations to develop guidance on design and construction of natural flood risk management (NFM).
- RMAs will work together to investigate how the benefits of NFM can be easily assessed including how they can be accommodated in hydraulic models or simpler benefit calculation tools.
- The EA will work with partners to develop simpler funding mechanisms for SuDS and small NFM projects.

**Q6a. To what extent do you agree with strategic objective 1.4: Between now and 2030 risk management authorities enhance the natural, built and historic environments so we leave it in a better state for the next generation? (Please select one answer)**

☐ No agreement



- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

We are strongly supportive of the government's ambition - as set out in the 25 Year Environment Plan - to leave the environment in a better state for the next generation. Ideally, the objective should be set in the context of flood risk management schemes.

**Q6b. Please provide comments on the measures described under strategic objective 1.4, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 1.4 can be found on page 30 of the draft strategy document)*

Measures could include making the funding mechanism for Flood Defence Grant in Aid (FDGiA) more flexible to work with other funding mechanisms where there are multiple partners delivering multiple objectives (for instance, single assurance routes for multiple public funds).

Defra/Environment Agency need to consider guidance and funding for schemes that deliver optimal benefits to the nation/environment as a whole, as opposed to only funding schemes that optimise flood risk management outcome measures. There may be schemes that can deliver many benefits across a number of sectors, but may cost more, or, to deliver the most benefits for the funding available, may need to reduce the outcome measures to maximise other outcomes. Conversations about these options are rare, as strategic decisions are usually predicated on delivering Outcome Measures due to this generating the most funding. A more strategic and environmentally holistic approach would help to deliver the National Strategy's ambitions for sustainable place-making.

**Q7a. To what extent do you agree with strategic objective 1.5: Between now and 2030, risk management authorities will use funding and financing from new sources to invest in making the nation resilient to flooding and coastal change? *(Please select one answer)***

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)

- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

Agree that new funding sources are needed.

In order for new funding and financing models to be viable, the EA and Defra will need to be less risk averse when considering innovative funding opportunities.

**Q7b. Please provide comments on the measures described under strategic objective 1.5, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 1.5 can be found on page 31 of the draft strategy document)*

Measure 1.5.1: We would welcome development of green finance as a method of investment.

Measure 1.5.2: Agree we need to test the feasibility of upfront financing for adaptive approaches. Upfront funding for other means already takes place via local government and PFI schemes and experience from these can already be pulled together to make a decision about whether or not to pursue this for flood risk.

Forward funding is not uncommon for upper tier authorities who may already do this for the building of public buildings like schools. However this process works best when this is a statutory duty (as with schools); when land is in public ownership; and if there is a guarantee that the scheme will present value for public money (i.e. the forward funding body will see its investment paid back). This may mean that it is easier to invest in infrastructure in places with high land values and less easy to do so in areas of deprivation.

It would help if the EA could borrow funds in the same way as local government.

In practice this would need planning and finance teams to work very closely together. Community Infrastructure Levy (CIL) regulations must be allowed to enable pooling of funds for infrastructure investment.

Private finance initiatives have been used to build important elements of infrastructure such as hospitals. These can often lead to a very high quality development but also to significant interest rates having to be paid by the organisation that has to repay the PFI borrowing.

Through measure 1.5.1 government and the EA need to come up with appropriate incentives to encourage more business-led financing, for example encouraging expenditure in return for reductions in taxation.

Private business and agriculture both have a large part to play and need to be more involved. A range of mechanisms for encouraging or mandating this need to be investigated in partnership.

## Section 4: Today's growth and infrastructure - resilient to tomorrow's climate

*We are asking for views about all of the strategic objectives and measures, however please do not feel you must answer all of these questions. If you don't have views to share, please leave the question blank.*

**Q8a. To what extent do you agree with strategic objective 2.1: Between now and 2030 all new development will contribute to achieving place based resilience to flooding and coastal change?**  
(Please select one answer)

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☐ Strong agreement (I can support it)
- ☒ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

Given that the pressures of climate change that are already affecting us, it is nonsensical to build new properties that are not resilient to flooding.

The statement about 99.4% of planning applications being decided in line with EA advice is slightly misleading as it doesn't take account of homes in surface water flood risk areas. LPAs should be required to report whether or not they decided planning applications against the advice of LLFAs. Cambridgeshire has reviewed past LLFA responses and the planning decisions made, and an average of 18% of applications are being decided against LLFA advice every year. This is based on data from 2015-2017 with 2018 showing that the same trend is likely once all the planning applications from that year are concluded.

On page 5 and 17 there is a statement that 'we are likely to see the number of properties built on the flood plan almost double by 2065'. CCC is under the impression that this statement hides several factors that need to be explained in the document. For example if the statement relates to development in Internal Drainage Board managed fens that are well protected and managed, or in London, or includes the expectation that climate change will increase the extent of the flood zones, this needs to be detailed in a caveat. Otherwise this is a contradiction in what the strategy is aiming to achieve. It recognises that properties already exist in harm's way and yet it suggests that development will continue to be permitted in these high-risk areas placing more properties in harm's way.

The consequence of properties at risk of flooding is not just the risk and cost of damage to these properties, it also means that flood defences have to be maintained (via public money) and emergency responders are put under more pressure to ensure the safety of residents in these developments during a flood emergency. Where development in a flood plain is unavoidable, including those water compatible businesses determined through the NPPF sequential test, these should be required to provide innovative solutions that adequately allow space for water and expected increases due to climate change.

**Q8b. Please provide comments on the measures described under strategic objective 2.1, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 2.1 can be found on page 34 of the draft strategy document)*

Measure 2.1.1 is already undertaken by most LLFAs but, especially for those county councils with a large number of local planning authorities, they would appreciate additional support with this. Investment in skills for planners and LLFA teams is dearly needed.

Measure 2.1.2 LLFAs may need training to assist with this and it would also help if legislation was a bit more specific in order to support LLFAs in this role. If local planning authorities (LPAs) or LLFAs were obliged to report on how many applications are approved despite LLFA objection, and if the wording of the Planning Act could be made more specific to ensure that LLFAs are a cited formal consultee on Local Plans (not just the upper tier authority as a whole) this would encourage policy planners to engage earlier and better with LLFAs. While the fact that LLFAs are not cited as a formal consultee on Local Plans may be a minor point in terms of planning wording, it does mean that LLFAs responses are not always taken seriously enough and that many upper tier LLFAs are not able to resource this area of work at all.

There would need to be consideration of how adaptive approaches can apply to new developments, especially with regards to who would be responsible for delivering any adaptation and maintaining any adaptive features. Most developments are not actively managed once they are built and sold and site components are often managed by a number of different people and organisations.

**Q9a. To what extent do you agree with strategic objective 2.2: Between now and 2030 all new development will seek to support environmental net gain in local places?** *(Please select one answer)*

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

We are supportive of this objective. It needs embedding in legislation to ensure developers adhere to its requirements.

**Q9b. Please provide comments on the measures described under strategic objective 2.2, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 2.2 can be found on page 35 of the draft strategy document)*

The measures are not strong enough to deliver the strategic objective.

While CCC agrees with the objective it will be challenging to deliver against these measures unless there is unified government support. It can already be hard to make flood risk management schemes cost viable, especially surface water schemes, without these additional environmental costs. If the public sector will struggle to deliver environmental improvements then the private sector will too, so clear policy will be needed.

There will be a resource and cash cost associated with measures 2.211 and 2.2.2 so funding and training for this will need to be found.

**Q10a. To what extent do you agree with strategic objective 2.3: Between now and 2030 all risk management authorities will contribute positively to local economic regeneration and sustainable growth through their investments in flooding and coastal change projects? *(Please select one answer)***

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

CCC understands what the EA is trying to achieve here but does not think the wording is right. We would prefer to see an objective that promoted economic benefits in all flood and coastal change projects, for instance "By 2030 all flood and coastal change projects will contribute positively to local and national economies".

There will be a cost associated with this (in training staff as well as in delivery). It is already difficult to make many flood risk management projects, especially surface water management schemes, cost viable (with current funding criteria).

**Q10b. Please provide comments on the measure described under strategic objective 2.3, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 2.3 can be found on page 38 of the draft strategy document)*

Supportive. CCC also proposes further measures:

The EA will undertake research into the flood and coastal change factors that affect local economies

RMA's will identify ways in which flood and coastal infrastructure project funding can account for local economic benefits

Government and the EA will imbed these findings in the partnership funding allocation rules along with measures to support wider national economic benefits

**Q11a. To what extent do you agree with strategic objective 2.4: Between now and 2050 places affected by flooding and coastal change will be 'built back better' and in better places?** *(Please select one answer)*

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

Ideally (in order to gain complete agreement) this would be implemented before the end of the Flood-Re scheme. This is an area where major change is needed and would make a huge difference to flood risk and flood damages in the UK. It is very important that the insurance industry's approach to building back is updated to ensure they 'build back better'.

**Q11b. Please provide comments on the measures described under strategic objective 2.4, and tell us about any additional measures you think there should be, and who could implement them.**



*(The measures for strategic objective 2.4 can be found on page 39 of the draft strategy document)*

Behavioural norms and changes cannot be properly assessed and understood without engaging with appropriate professionals, groups and people that represent the communities that need to change. Part of the change needs to come from homeowners and businesses to adapt their premises, in the way they have to prevent burglary. CCC would like to see more measures that help to deliver a built back better culture. For instance:

The EA will pull together or undertake new research into how to deliver the behaviour changes required of home and business owners to adapt their premises to be flood resilient.

The EA will investigate the opportunities to use FDGiA to support 'build back better' and implement changes to the funding allocation rules

The EA and RMAs will promote the benefits of "build back better".

**Q12a. To what extent do you agree with strategic objective 2.5: Between now and 2030 all flooding and coastal infrastructure owners will understand the responsibilities they have to support flood and coastal resilience in places?** *(Please select one answer)*

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☐ Strong agreement (I can support it)
- ☒ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

Strongly agree. This section is well written and acknowledges the different scales of both infrastructure and infrastructure owner.

The issue of riparian ownership needs greater consideration, better national communications and a recognition by government that riparian infrastructure can have a significant impact on both local flood risk and local RMA resources. More work needs to be done in this area. Many residents do not have the awareness, expertise or funding to manage flood risk assets or structures.

Could it be made clear in the text that this includes bodies that are not an RMA but who still have infrastructure that impacts on flood risk (e.g. Network Rail whose rail embankments often create defacto defences and also have drainage culverts under them). Organisations need to consider not just the flood risk affecting their own infrastructure but how their infrastructure affects others.

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**floodline**  
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**Q12b. Please provide comments on the measures described under strategic objective 2.5, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 2.5 can be found on page 41 of the draft strategy document)*

CCC would like to see a measure that directly addresses the issue of flood risk management infrastructure in private ownership, considering national awareness raising and providing education and training to private owners. Ideally there should also be consideration of (and therefore a measure for) who the most appropriate asset owner is for significant infrastructure and how to apply standards of resilience (see Objective 1.1) to private assets.

The EA is directly funded for maintenance of flood risk management assets, however LLFAs, coastal authorities and private owners do not receive direct funding for maintenance. This will impact on levels of maintenance, lifetime of assets and certainty around standards of protection as well as constructing new flood risk management assets (as they become a maintenance burden). CCC acknowledges that those responsible for the infrastructure playing the greatest role in flood risk management should be funded. However given the significant risk in some places related to riparian owned assets and the huge resource burden on RMA time to try to facilitate improvements, CCC would like to see research undertaken to look at whether it would be more equitable for all flood risk management infrastructure to be considered for maintenance funding based. The approach should be based on risk and be irrespective of the owner or responsible body.

**Q13a. To what extent do you agree with strategic objective 2.6: Between now and 2050 the Environment Agency and risk management authorities will work with infrastructure providers to ensure all infrastructure investment is resilient to future flooding and coastal change? (Please select one answer)**

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☐ Strong agreement (I can support it)
- ☒ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

-

**Q13b. Please provide comments on the measures described under strategic objective 2.6, and tell us about any additional measures you think there should be, and who could implement them.**

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*(The measures for strategic objective 2.6 can be found on page 43 of the draft strategy document)*

Measure 2.6.1. We need to work with government as well as infrastructure providers to ensure infrastructure investment is resilient.

Delivery of this objective will be contingent on establishing a standard of resilience that infrastructure needs to meet. Given the greater number of people affected by infrastructure failure, it may be appropriate to set a higher standard of resilience for infrastructure.

CCC would like to see measures that support the understanding and assessment of the risk to infrastructure and the impacts that it has on communities and the economy. For instance:

The EA and RMAs will work with infrastructure providers to assess and map the risks of flooding and coastal change to infrastructure, the impacts that risk has on communities and the economy and the impacts that loss of infrastructure has during incidents.

This assessment will need to include identifying the communities affected by the loss of infrastructure even where they may not otherwise be affected by flooding and the impacts of, for example, losing electricity that powers pumps or mobile signal needed for provision of information. The maps should be and available for use in Flood Emergency Plans. Measures to address the impacts could then be identified and included in Flood Risk Management Plans.

CCC would also like to see measures that make requirements on owners and operators of key infrastructure to ensure their infrastructure meets minimum standards of resilience.

Please continue to the next page.

## Section 5: A nation of climate champions, able to adapt to flooding and coastal change through innovation

*We are asking for views about all of the strategic objectives and measures, however please do not feel you must answer all of these questions. If you don't have views to share, please leave the question blank.*

**Q14a. To what extent do you agree with strategic objective 3.1: Between now and 2030 young people at 16 should understand the impact of flooding and coastal change, but also recognise the potential solutions for their place, and opportunities for career development? (Please select one answer)**

- ☐ No agreement
- ☒ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☐ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

A clearer syllabus in this area with useful material would be helpful for, and has been requested by, teachers. Recent climate news and protests demonstrate that many young people do already have good awareness of climate change; underpinning this within the formal education system would help ensure even more young people become aware and better informed. While this strategic objective is critically important for the long term we also feel that action is needed to engage other age groups. We all have a role to play. We need to raise awareness with people who:

live at risk of flooding but aren't aware.

don't live at risk of flooding today but may move to a flood risk area in future.

don't live at risk of flooding but may be able to support local communities who do.

The timescale is disappointing as this objective will take more than a generation to educate the nation and on its own it is unlikely to have a significant impact on the awareness of the nation.

Neither this objective, nor any of the others proposed, will create a nation of climate champions. Far more detailed proposals are required to meet this aim.

**Please continue to the next page.**

**Q14b. Please provide comments on the measure described under strategic objective 3.1, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 3.1 can be found on page 48 of the draft strategy document)*

Assuming the objective remains the same, CCC suggests that more proactive and engaged methods are needed to raise awareness. For instance:

RMA's will work with partners to deliver and maintain a national social media campaign on flood risk and climate change impacts and tailored social media campaigns for specific flood risk areas.

**Q15a. To what extent do you agree with strategic objective 3.2: Between now and 2030 people will understand the potential impact of flooding and coastal change on them and take action? (Please select one answer)**

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

If the objective was reworded to "Between now and 2030 people will understand the potential impact of flooding and coastal change on them and they are supported to take appropriate action" this would be more measurable. It would also take in account that communities need to be empowered to take action and it may not always be in their power to deliver the actions that are needed e.g. with coastal erosion.

Understanding flood risk is a key part of this, but the National Strategy must go beyond just telling people about risk, as this alone will not develop a nation of climate champions or self-actors. Significantly, more direct engagement is needed to move not just to 'understanding' but from 'understanding' to 'taking action'. This will require significant extra resources across RMA's.

'Taking action' is not just about protecting oneself but also about doing your bit (e.g. as a landowner or neighbour) to ensure you are supporting your community and not making flood risk worse. This could be doing your riparian maintenance but also supporting others with post-flooding trauma.

The recognition of the mental health impacts of flooding, in all ages of people, is very important and we would like to see this followed up with some related measures as suggested in Q16b.

**Q15b. Please provide comments on the measures described under strategic objective 3.2, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 3.2 can be found on pages 49 and 50 of the draft strategy document)*

The measures here are quite specific and limited and they need to be stronger and more wide reaching in order to engage with and empower communities.

The first two suggested measures below are intended to cover working with people to make them realise that they can all make flood risk better or worse by their local actions. This includes actions like not blocking drains with fly tipping, litter, fats, oils, greases or building materials and by undertaking any riparian responsibilities that they have or helping others to do so. The third new measure is about pulling together the complete picture for everyone to understand.

New measure: By end of 2020 the Environment Agency and other RMAs will work with government and the Law Society to raise awareness of flood risk nationally and the roles that individuals play in managing that risk, whether as those with riparian responsibilities or just responsible community members.

New measure: By 2021 the Environment Agency and other RMAs will work with government to raise awareness of flood risk nationally and the roles that businesses play in that risk, whether as riparian owners or just responsible members of the community.

New measure: By 2022 all RMAs will be working with government nationally to improve all communities understanding of the links between flood risk, severe weather, climate change, carbon emissions and the daily actions of individuals.

New measure: By 2030 community flood groups will have been established in all communities at significant risk of flooding and these groups will have developed and tested local flood plans with the support of the EA and risk management authorities.

Also see new mental health measure suggested for objective 3.3

**Q16a. To what extent do you agree with strategic objective 3.3: Between now and 2030 people will receive a consistent and coordinated level of support from all those involved in response and recovery from flooding and coastal change?** *(Please select one answer)*

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)
- ☐ Strong agreement (I can support it)
- ☒ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

**customer service line**  
**03708 506 506**

**incident hotline**  
**0800 80 70 60**

**floodline**  
**03459 88 11 88**

The text in the section relating to this objective should recognise that planning for and response to surface water flooding is quite fragmented across England, and needs addressing as a matter of urgency. The text “The planning for and response to surface water flooding is led by lead local authorities” is incorrect.

LLFA’s work primarily is about mitigating flood risk. While most LLFAs will play some role in response to surface water flooding not many currently play a formal role in planning for a flood event or in the response to an event. These activities are still very much lead by Local Resilience Forums and emergency planners. The role of the LLFAs in emergency planning and response varies hugely from council to council. It is also worth noting in the strategy that compared to river and sea flooding it is difficult to plan for surface water flooding given the lack of clear warning for local communities.

**Q16b. Please provide comments on the measures described under strategic objective 3.3, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 3.3 can be found on page 51 of the draft strategy document)*

Measure 3.3.1 here is assumed to be talking about roles in response to surface water flooding. If it is then CCC supports this but it should be reworded to:

Measure 3.3.1 to: By 2021 the Environment Agency will work with government, RMAs and emergency responders to clarify roles in relation to planning for and response to surface water flooding.

If the measure is actually talking more generally about responsibilities for all elements of managing surface water flood risk then this needs to be amended and this current measure put elsewhere in the strategy.

We wonder if measure 3.3.3 should be a bit clearer re which organisations you are talking about and perhaps edited to: By 2025 the Environment Agency will work with government, emergency responders, the insurance industry, charities and the private sector to better join up the organisations involved in providing incident response and recovery to provide a consisted and coordinated service.

CCC considers that RMAs should investigate whether it is possible to have other methods for public flood warnings for those not covered by the EA’s flood warning service e.g. communicating weather warnings for those vulnerable to surface water or for those that might not be flooded but might be affected by flooding due to isolation, road closures etc.

New measure relevant to objective 3.2 and 3.3: By the end of 2020 the EA will work with Public Health England and the Association of Directors of Public Health and other relevant parties to raise awareness of the impact of flooding on mental health and to develop plans for rapid support and interventions in the early stages of community recovery following flood events.

**Q17a. To what extent do you agree with strategic objective 3.4: Between now and 2030 the nation will be recognised as world leader in managing flooding and coastal change, as well as developing and attracting talent to create resilient places? (Please select one answer)**

- ☐ No agreement
- ☐ Some limited agreement (I can agree in part, but not entirely)
- ☐ Basic agreement (I can live with it)

**customer service line**  
**03708 506 506**

**incident hotline**  
**0800 80 70 60**

**floodline**  
**03459 88 11 88**



- ☒ Strong agreement (I can support it)
- ☐ Complete agreement (I can support it wholeheartedly)
- ☐ I don't know
- ☐ Not applicable

**Please explain your answer:**

CCC supports this objective and considers that leadership requires significant investment across the sector, not just in talent and standards. The discussion about this objective only considers how professional talent will be improved and standards established. In order to become a world leader in flood risk management the nation will need to also invest world leading, or at least substantially more, funds in this sector. Without more investment it is hard to see how the nation can become a world leader.

**Q17b. Please provide comments on the measures described under strategic objective 3.4, and tell us about any additional measures you think there should be, and who could implement them.**

*(The measures for strategic objective 3.4 can be found on page 53 of the draft strategy document)*

Measures 3.4.1 is a bit vague on who or what you are intending to target. There is a question as to whether this relates to the communities' use of flood resilience products, the insurance industry's or developers. We would suggest there is also a measure to say that by 2022 the Environment Agency and RMAs will use flood resilient measures that have been tested and assured by standards setting organisations (i.e. that have a kite mark).

In measure 3.4.2 'will influence' makes it unclear what you are expecting to achieve by when. It should be changed to "will have influenced", either in 2025 or say 2027. This is because the current date on measure 3.4.2 is too far in the future to just have started influencing higher and further education given that we have skills shortages now. The work needs to be complete as soon as possible. LLFAs and the Environment Agency (Paul Cross' team) are already looking to develop new courses for the sector.

## Section 6: Any other comments

**Q18. Please provide any other comments:**

Action plan

Given that the action plan is going to be absolutely key to the delivery of the strategic objectives and that it is expected that the actions will span all RMAs it is important that RMAs are involved in the drafting of the plan.

Resilient places and infrastructure

CCC welcomes the strategy seeking to work with the growth agenda rather than against it, which makes it more achievable. A place-based approach where required outcomes (not outputs) and guiding principles

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**floodline**  
**03459 88 11 88**

can be interpreted and applied appropriately allows local partners to deploy the most appropriate and innovative means to deliver. This recognises that local places work differently and that 'one size fits all' is not the most effective or efficient way to achieve the desired outcome. It is essential that the outcomes are enshrined in policy and legislation to ensure local decision makers can be held to account.

CCC would like to see an objective in the strategy that supports the development of a culture of resilience by design, so that all projects, programmes, developments and interventions adopt climate resilience measures, in the same way that energy efficiency is undertaken by design. This would reduce the reliance on consultations to ensure best practice is followed (reducing EA resources) and would mean schemes that aren't consulted on still adopt these practices.

Delivering a successful flood strategy requires commitment across government; it cannot just be an EA or Defra issue. In order to ensure that development can and does bring forward the needed levels of resilience and environmental improvement the government must find a way to ensure consistent policy development between departments to support the building industry and national infrastructure providers to do so. The lack of join up means that currently it is easy for bad practise to develop. Without consistency, the costs of either resilience or the fallout from flooding will fall very unevenly and some development phases, developers, councils or residents will end up picking up the whole bill. At present even Homes England and the Housing Infrastructure Fund are not sufficiently funded to deliver the resilience that this country needs. We therefore fully support the aim for cross-Whitehall recognition of the need to invest in flood and coastal erosion risk management.

Local Industrial Strategies are an example of where a joined up approach is needed but is not often being realised. Too few of them have references to environmental issues and opportunities.

Environmental issues:

CCC supports a valuing Natural Capital approach to developing wider environmental resilience e.g. using upland moors to retain water ('slow the flow'), reduce soil erosion, increase biodiversity and the landscapes resilience to climate change and reduce flood risk elsewhere. The strategy recognises biodiversity and wider environmental net gain but makes insufficient references to wider water and environmental management benefits. This is disappointing given that 'putting water at the heart of decision making' was one of the working groups and that partners are hoping for a more joined up approach to River Basin Management Plans and Flood Risk Management Plans in this cycle.

Partnership:

The National Strategy continues with a very top down approach and while this, and the need to devolve funding for other partners to take stronger roles, is understood, it is not the ideal way to create a climate resilient country or nation of climate champions. The strategy is clearly written from an EA perspective. Addressing the gaps in the delivery of surface water flood risk management and the challenges that LLFAs have in accessing funding would be a useful step towards creating a resilient nation.

Resilience vs protection:

The shift from protection to resilience is going to be challenging for communities. The roles of government and local government in promoting and delivering on this message need to be made clear.

General:

The text describing the sections is often very well worded so it is a shame for some very basic mistakes plus some weak objectives and measures to let this down. By addressing the points made in this response we believe that strategy can be strengthened and become a strong leading partnership strategy for the flood and water sector.

It is very hard to find and reference sections in this document; it would be much better if each section was numbered. This would also help to break up the document.

END OF CCC RESPONSE

## Section 7: Strategic Environmental Assessment Environmental Report

CCC is not commenting on the SEA.