

DR BEN SPENCER MP
RUNNYMEDE AND WEYBRIDGE



HOUSE OF COMMONS
LONDON SW1A 0AA

Flood Risk and Coastal Erosion Risk Management Team
Department for Environment, Food and Rural Affairs
Foss House, Kings Pool 1-2
Peasholme Green
York
YO1 7PX

29/03/2021

Dear Sir/ Madam,

Re: Floods Call for Evidence

This submission has been prepared in response to key issues and questions raised in the 'Managing Flood and Coastal Erosion Risk and Property Flood Resilience' consultation published by DEFRA in February 2021.

As highlighted by DEFRA, the River Thames as it runs through my constituency is on the largest area of undefended, developed floodplain in England¹. In the past, the area has suffered serious floods, the extent of which is highlighted in Image 2 below. With climate change, the risk of flooding is only going to grow. The River Thames Scheme, which will alleviate the risk of flooding, is unfortunately already significantly delayed and will still take years to be delivered.

As highlighted by the Secretary of State in his foreword, flooding not only poses a risk to life and property, but also affects our health, wellbeing, businesses and livelihoods. The flooding in 2014 saw huge and costly damage to many homes and businesses in Runnymede and Weybridge. While I am of course pleased this has not been repeated since, every time water levels rise and flood alerts and warnings are issued it causes a huge amount of stress and anguish and my constituents should not have to live in fear of flooding.

My response to this consultation therefore will focus on three key priorities for flood risk management: speeding up the process for delivering high priority flood alleviation measures, encouraging greater uptake of household flood mitigation measures, and improving communication and access to information for those who are at risk. The response below sets out my comments and suggestions to the sections of the consultation relevant to these three areas.

¹ <https://www.gov.uk/government/publications/river-thames-scheme>



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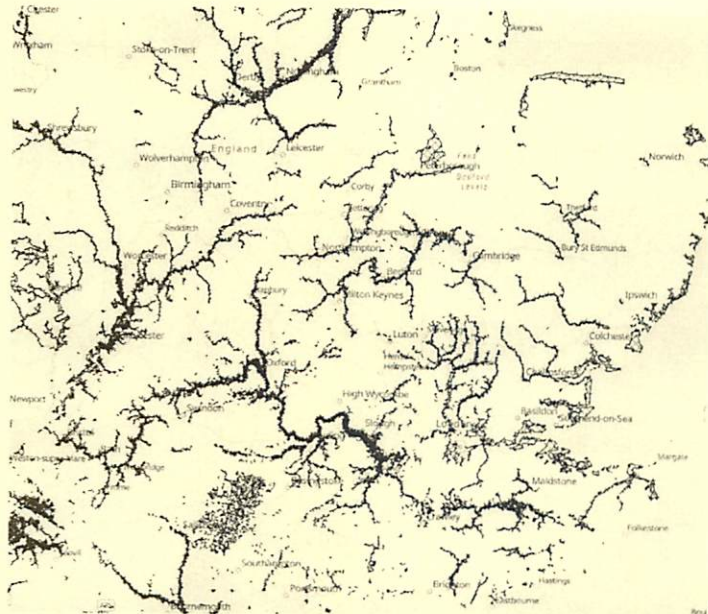


Image 1²

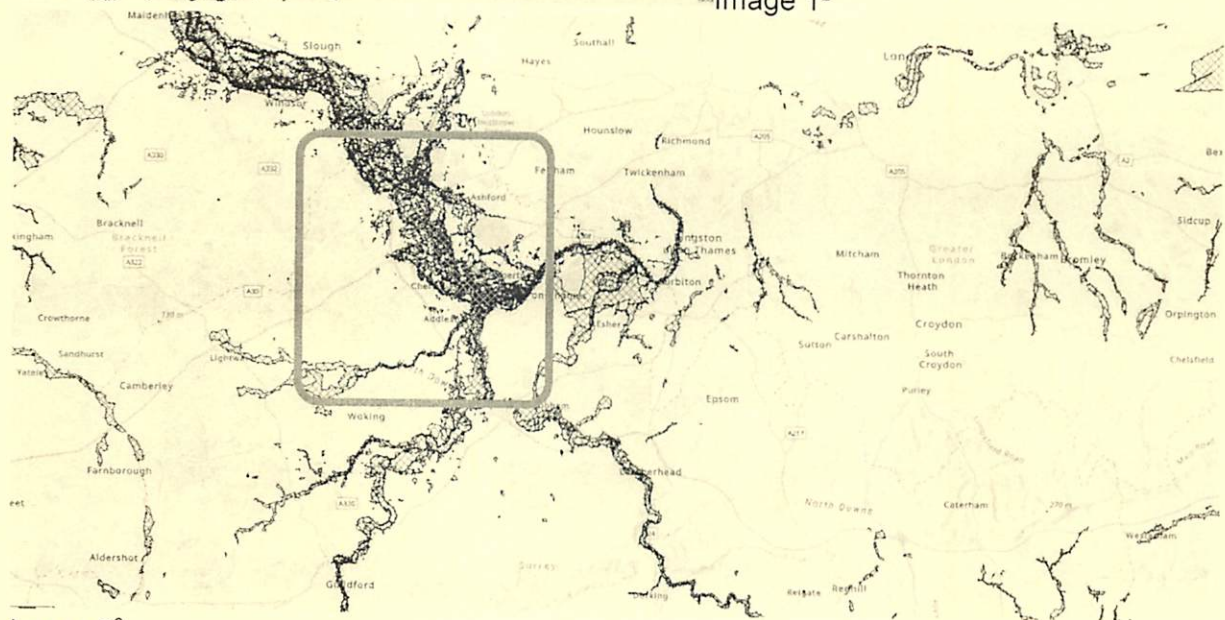


Image 2³

Resistance measures for properties and communities

Large infrastructure or community schemes are not always viable to address flood risk, as they can be costly, cause significant disruption and take time to deliver. I would therefore welcome greater support for the installation of resistance measures to properties through the

² Recorded flood outlines showing areas of repeated flooding,
<https://environment.data.gov.uk/arcgis/rest/services/EA/RecordedFloodOutlines/MapServer>

³ Recorded flood outlines highlighting Runnymede and Weybridge



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flood defence investment programme, to ensure households have greater access to measures to reduce flood risk to their homes.

I welcome the Government's recognition of the need to accelerate the uptake of Property Flood Resilience (PFR) measures to limit the damage and disruption caused by flooding. Currently Grant Aid for PFR is only available for those in the highest risk bands, however as stated in the report, evidence shows that manually operated measures such as door gates and air brick covers are generally cost beneficial for a greater number than those currently eligible.

I support the relaxing of this requirement to ensure more households can benefit from support to protect their properties from flooding and believe we should consider this more in line with existing schemes to improve home efficiency, such as home insulation, replacement boilers etc.

In addition to broadening eligibility, to encourage uptake there also needs to be clearer communication of the support available, potential benefits, eligibility criteria and where to access advice and information. Any changes to the current flood defence investment programme should include an objective to communicate this clearly and directly to all households potentially affected.

With regards to encouraging a greater private market for PFR, it is important to draw the distinction between retrofitting measures and agreeing standards for new builds. I agree that where existing home or business owners feel they may benefit from improved flood resistance or resilience measures this should be accessible and, if possible, incentivised. Whether this is through lower insurance premiums due to lower risk, or in the case of businesses, tax offsets for their investment, or simply offering a centralised approach which can reduce costs through economies of scale, I believe it would be beneficial to work with commercial partners on potential models for a more vibrant private market.

For new build properties I would support new measures being brought forward to strengthen planning policy and business regulation to ensure any new build property had minimal flood risk and mitigated any increased flood risk on neighbouring properties caused by the development. I would urge DEFRA to liaise with MHCLG to ensure robust joint policy development in this area.

Inefficiencies caused by the length of time taken to develop schemes

The current process for developing a business case is not only lengthy but also confusing for local communities. The current process, requiring a Strategic Outline Business Case, followed by an Outline Business Case, and finally a Full Business Case, is neither clear nor concise, and often leads to local resentment and frustration due to perceived repetition and frequent delay.



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The River Thames Scheme is a clear example of this. Despite the strategic outline having been presented in 2015, the scale of the Scheme meant significant challenges and delays were faced when agreeing and allocating costs, to the extent that funding was not agreed until late 2019. Even with this agreed, work has still not progressed to begin planning or public consultation on the Scheme.

Complex projects of this magnitude will undoubtedly take significant time to plan and develop, and the River Thames Scheme in particular has undergone significant change during this period, however any measures which can be fairly brought in to streamline this process would be beneficial to all. As funding is usually a particularly contentious area, I would particularly support measures to encourage more private investment in schemes. Where businesses stand to benefit from the greater resilience and improved infrastructure it is right that they too should contribute, however as returns are difficult to quantify, and spread over a long timeframe, measures should be put in place to incentivise this investment.

In a similar way to the investment super-deduction announced in the Budget on 3 March, I would urge Government to consider innovative ways to incentivise business investment not only in their own businesses, but also directly into our communities.

Beyond funding decisions, I agree that clearer and more transparent information on the process and timeline for projects would be beneficial. I do not support funding being conditional on fixed time limits as this would remove the flexibility often required and could result in projects such as the River Thames Scheme being rejected despite the strong need and business case. However, I do believe timely progress through the process could be incentivised, and look forward to further proposals being brought forward in this area.

Metrics and reporting

In addition to the data outlined in figure 4 and figure 5 of the report which could be used to develop the case for and report progress on the flood defence programme, I believe data should also be collected on cultural and historical sites which would benefit from the greater protections provided. The information on businesses, infrastructure and environmental improvements are important, but our heritage is also vital to our communities, and damage caused can be greater, or even be irreparable.

Communication, knowledge and understanding

As highlighted above, I believe further work is needed to improve understanding and accessibility of flood risk and the measures available to prevent or reduce the impact of flooding. Earlier this year when another flood warning was issued for the River Thames, it became evident that residents' expectations of local authorities to mitigate flood risk were, at times, inaccurate, but also the support and information provided to them in return was not always clear or readily available.



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For communities that face a known risk of flooding, agencies should work together with residents to ensure clear and concise information is accessible to all. Last week held a meeting with representatives of Runnymede Borough Council, Surrey County Council, the Local Resilience Forum and the Environment Agency to discuss how to better communicate and respond to flood alerts when they are issued. I will be holding further discussions with local authorities, resident flood groups, and utility companies to drive forward action in the lead-up to a Flood Group Conference I am organising this summer to be held in the constituency.

I am grateful to everyone involved for their commitment to working together to improve the information and support available to residents, but the creation of formal flood control centres in areas of significant flood risk that residents can call directly, would formalise this work, providing greater awareness support and accountability.

Yours sincerely,

A handwritten signature in black ink, consisting of a series of fluid, connected strokes that form a stylized representation of the name 'Ben Spencer'.

Dr Ben Spencer
Member of Parliament for Runnymede and Weybridge