RESPONSE TO THE FLOOD RESILIENCE INQUIRY[1], ENVIRONMENTAL AUDIT COMMITTEE

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Inquiry questions

Strengthening Flood Resilience

1. To what extent are current flood resilience assets and interventions fit-for-purpose and what are the strengths and weaknesses?

- Are there alternative approaches from across the UK and elsewhere which could help inform improvements and innovation?

The work of individual farmers and farm clusters such as the North Essex Farm Cluster is invaluable in helping to increase flood resilience. In North Essex, there are numerous projects in action all of which are helping to keep water on the land for longer while also creating new habitats. One farmer we are in contact with has reported this month that his two-year-old wetland, that was previously arable land now attracts egrets, green sandpipers and snipe. This one case study is instructive because it involves new ponds on the flood plain, one of which is fed by a culvert that travels around 1km from the main road and takes the road run-off and holds it back. The next stage of the proposal will be to consider releasing water from the River Blackwater onto the floodplain in times of high flow.

In addition, the Cluster and the local farming advisory group, along with Natural England, are creating numerous new ponds where 'ghost ponds' are found. These also hold water back during periods of heavy rain and some of them have been designed specifically to do this

Finally, Spains Hall Estate, at the top of the River Pant/Blackwater cluster area has a very successful beaver project which is reducing flooding and slowing water flow.

Farmers are key to successful natural flood resilience.

For some years, there has been talk of the need for a giant concrete dam (paid for by quarrying 400 acres adjacent to the River Blackwater) at Coggeshall, but it is interesting that since all of the measures outlined above have taken place, Coggeshall has not flooded. It will be essential for the Environment Agency to model the impacts of the natural flood management measures being employed in the catchment before moving ahead with the dam.

2. How appropriate is the current balance between 'green' nature-based solutions and 'grey' hard infrastructure resilience assets, and what adjustments, if any, are needed to improve it?

- What role can natural flood management techniques, such as wetland restoration and tree planting, play in enhancing flood resilience while contributing to broader biodiversity and climate objectives?

[1] https://committees.parliament.uk/work/8736/flood-resilience-in-england/

The starting emphasis should be on natural flood management techniques, such as wetland restoration, river re-wiggling, pond creation and tree planting. Peatland and wetland restoration, for example, provides many benefits in addition to supporting huge levels of water capture and storage (including carbon sequestration and biodiversity gains). One of the many advantages of such restoration is the negligible costs and carbon footprint of taking action. There is no requirement, for example, for the manufacturing of major technology or equipment and no ongoing use of fossil-fuel based power (although we do recognise that restoration techniques might involve some initial machine-using groundwork and some installation of plastic dams or pipes).

Restored peat mosses and wetlands require relatively low maintenance, perhaps some weed incursion control, but mostly it is over to the forces of nature to deliver the many benefits.

Grey techniques should be the last resort.

3. What changes to the planning system and building regulations are needed to ensure that buildings and infrastructure are resilient to flooding in the short, medium, and long-term?

- What long-term land use strategies and approaches to flooding should the government consider, especially for communities that cannot be protected from flooding or inundation?

Land use strategies which cover all the ecosystem and natural capital services provided in an area are an essential tool for ensuring that climate mitigation, future food security and nature's recovery are all considered as an equal priority alongside growth and development.

The definition of the terms 'sustainable development' and 'sustainability' are not defined sufficiently clearly within the National Planning Policy Framework (NPPF). It must be explicit that these terms are not just referring to the materials that buildings, roads or other infrastructure are made of. Development should not be considered to be 'sustainable' if it will cause or exacerbate flooding either in the area of development, or in nearby or downstream communities. Local knowledge should be taken into account, as well as the on-paper exercises from consultants. The lack of focus on sustainable passenger and freight transport also adds to flood risk – the continued prioritisation of new roads, rather than rail/water based transport is exacerbating the problems highlighted by local communities.

Land, such as wetlands and peatmosses, which captures and stores huge amounts of water should be explicitly referenced in the NPPF and required to be subject to specific risk assessment.

Currently only the standard method for calculating housing need is mandatory in the planning guidance. It seems developers and councils can cherry-pick which of the other criteria in the NPPF they wish to comply with. Environmental policies are not given the same weight as those relating to the economy. Local plan policies are treated in much the same way.

There is, therefore, insufficient consideration of the risks associated with flooding during the plan-making and decision-taking stages of the planning process and there is insufficient accountability for making decisions that result in higher risks of, or actual, flooding incidents.

Evidence presented must include an analysis of any new natural flood management systems in place or planned.

Community evidence of flood risk must be acknowledged by a planning authority and/or the Planning Inspectorate.

Sites are allocated for development despite their current ecosystem services including high levels of water capture and storage. See the Case Study below:

Case Study New Carrington Allocation:

The New Carrington Allocation within the Greater Manchester Spatial Plan[2] has involved the release of 169 hectares of Green Belt against the wishes of the local community. One of the key reasons for the lack of local support is the concern about the huge risk of local flooding when the developments go ahead. There is no confidence that solutions, which may meet planning guidelines, will provide sufficient resilience for both existing and new communities.

The former Green Belt land comprises part of a 335-hectare peat moss (restorable according to Natural England), Grade 2 Best & Most Versatile agricultural land, woodland and wetland habitats. Fifteen sites of biological importance (8 within the allocation boundary and a further 7 on its perimeter) and one site of special scientific interest will be impacted.

Both councillors and communities continue to challenge the developments planned here as there is a real risk of local and downstream flooding. The high levels of water capture in this location are not a 'one-off' incident. Carrington 'Lake' is a feature which appears every year, particularly in the autumn/winter months. It is embraced by local communities because of the protection from flooding that it delivers. Please see our recent blog[3] and additional photographs on the Carrington Lake page of our website[4].

Despite the supposed protections in the NPPF and the requirement that (paragraph 188), for example, plans should "*allocate land with the least environmental or amenity value*", the land that has been allocated here has the highest environmental/amenity value in Trafford. Given the current ecosystem services provided, this land should have been retained for climate mitigation, nature's recovery and future food security, providing benefits to surrounding communities and those downstream of the River Mersey and Sinderland Brook (which is where all that water will culminate).

Monitoring flood resilience

4. To what extent are current metrics for monitoring the effectiveness of flood resilience fit for purpose, and what improvements could make them more effective?

- Do current metrics capture the range and effectiveness of privately-owned flood resilience assets, and if not, how can this be improved?
- Do we have appropriate metrics and mechanisms to measure the cost effectiveness of flooding assets and interventions in terms of investment versus long-term savings and, if not, what should they look like?

Insufficient emphasis is placed on metrics to monitor the outcome of development where properties have flooded (whether this is the new build or where, as a consequence of development, existing properties have flooded). These metrics should assess what information was made available at each stage of the planning process and whether decisions were made despite the risks being highlighted – or were decisions made because the risks were not highlighted. This would be valuable learning information to support decision making for future planning applications in areas likely to be impacted by, or cause, flooding.

[2] https://www.greatermanchester-ca.gov.uk/media/3ccbetc4/post-adoption-places-for-everyone-joint-development-plan.pdf

[3] https://friendsofcarringtonmoss.com/2025/01/05/what-exactly-is-the-vision-for-new-carrington/

[4] https://friendsofcarringtonmoss.com/carrington-lake-2/

Metrics should also capture the full cost of flood incidents to understand which organisation or individuals have picked up the costs of the consequences of flooding. This is important because if costs were avoided during the preparation for the development, the public sector and individuals may be picking up costs that should be funded by developers.

It is unlikely at this stage that there is sufficient monitoring or evidence around natural flood techniques and their benefits/impacts. These techniques must be developed and used. For example, in the answer to question 1, we discussed the various projects in the Blackwater Catchment and evidence of these should be consolidated and their impact understood.

Coordination of flood resilience

5. How effectively and how frequently do flood risk management authorities work together to tackle flooding issues and do they have sufficient resources and skills available to carry out their work?

- For instance, how can the government ensure that areas prone to flooding near the mouth of a river, are not negatively impacted by increased pressure on the river, or by flood-mitigation measures taken upstream?
- Where is the interface between the responsibilities for river and surface water flooding, and how could monitoring and coordination be improved to enhance effectiveness and early warning of flooding?

Farm clusters are an excellent way to bring together the relevant bodies. See www.northessexfarmcluster.co.uk for its sponsoring bodies.

6. What should the key priorities be for the Flood Resilience Taskforce, and how can it enhance coordination and improve flood resilience?

- Is there a role for community-based flood response teams, and who is responsible for building that resource?

Provide funding and support for farmers, farm clusters and community groups.

7. Is there a backlog in maintenance of existing flooding adaptation/resilience assets and in identifying where new ones could be introduced?

- Is there clarity about whose responsibilities these are, and how could this be improved?
- How strong is the knowledge base on both the condition of existing assets and where new ones might be needed and what steps could strengthen it?

Resources, funding and support for flood resilience

8. What level of flood resilience is required to address the flood risks identified in the Climate Change Risk Assessment and is current funding adequate to meet these risks effectively?

- Is there sufficient government support and funding for the maintenance of privately-owned flood defence and resilience assets?

- What changes, if any, should be made to the next iteration of the Flood and Coastal Erosion Risk Management (FCERM) investment programme to improve its outcomes?
- How well does the National Adaptation Plan address the need for flooding adaptation measures, and what additional steps should be taken to ensure effective long-term flood resilience in high-risk areas?

9. How can the Government encourage more long-term private investment in flooding defences and resilience measures?

- What role can the insurance industry play in supporting this?

10. What support do property owners and neighbourhoods require to enhance their resilience to flooding?

- What is the current level of awareness among property owners about flood resilience measures, how they can be improved, and who can support it?

About the Community Planning Alliance

The Community Planning Alliance was founded in 2021 to support grassroots campaign groups operating in the planning system. Our map lists over 600 campaigns, all over the UK. We lobby for better community participation in planning, greater environmental protections and the right houses and infrastructure in the right places.

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