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Consultation on Draft National Flood and Coastal Erosion Risk Management Strategy for England

Dear Morena,

Water UK represents and works with all major water and wastewater service providers in England, Scotland, Wales and Northern Ireland. Our vision is of a water sector that provides customers and communities with world-class services and enhances the UK's quality of life.

We welcome the opportunity to respond to this consultation, on behalf in particular of our members in England given the geographical remit of the strategy. We would be happy for our response to be published.

We support the overall direction of the strategy in moving from a narrow focus on protection to a broader concept of resilience. This journey is similar to that taken by the water industry over recent years, with resilience having been embedded through the statutory duty introduced by the Water Act 2014 and being a central theme for the 2019 Price Review.

We also support the ambition of a holistic approach to flood resilience across a wide range of sectors. As the concept of 'resilience' can be subject to different interpretations, it would be helpful in building a shared understanding of the strategy and its implications to put this more explicitly within the context of the overall '4Rs' approach to resilience set out by the Cabinet Office, encompassing resistance, reliability, redundancy and response & recovery.

This would provide greater clarity that in the face of natural processes like flooding from rivers and coastal change – and the impact of climate change and population growth – we will as a society need to consider a wider range of options than in the past, and that this will inevitably involve making what may be difficult choices. Wherever possible, we should accept and work with the grain of natural processes, through natural flood management, good land management, temporary flood storage areas and sustainable drainage systems.

Delivering the strategy will require enhanced co-ordination and collaboration across many organisations; the Environment Agency's strategic overview role will therefore be crucial. It would be helpful to understand more about how the Environment Agency envisages this role might evolve over the timeline of the strategy.

In the appendix we provide comments specific aspects of the draft strategy; we have welcomed the opportunity to work with the Environment Agency during the development of the draft strategy and look forward to continuing to do so as the strategy is developed further.

Yours sincerely,

A handwritten signature in black ink that reads "Rob Wesley". The signature is written in a cursive style with a long, sweeping tail on the letter "y".

Rob Wesley

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Appendix Detailed comments on the draft National FCERM Strategy for England

In this appendix, we provide comments – where appropriate – on specific aspects of the draft strategy.

An overall observation is that many of the objectives and measures refer generically to ‘risk management authorities’ (RMAs) or ‘infrastructure providers’, categories which can overlap. Understanding of the strategy and its implications for individual organisations would be enhanced by a more disaggregated approach and, where appropriate, identifying where there are perceived to be the greatest gaps to be addressed.

In addition, understanding of the different timeframes for the elements of the strategy could be enhanced by a graphical summary highlighting the milestones proposed at the various dates set out in the strategy, such as 2020, 2021, 2022, 2024, 2025, 2026, 2030, 2050 and 2100.

This would also aid the identification, and testing, of linkages and interdependencies between different aspects of the strategy, and the roles of different organisations. Given that many of the objectives will need much more collaborative approaches to planning, delivery and funding, developing a shared understanding of the delivery timeline will be essential, as will looking at opportunities to address any barriers to greater collaboration.

Strategic Objectives 1.1 and 1.2

We support both the overall direction of the strategy in moving from a narrow focus on protection to a broader concept of resilience, and the facilitating concept of common standards for flood and coastal resilience that can be used to drive consistent and co-ordinated actions by all parties.

We would though caution that the complexity of the task of developing, testing, agreeing and implementing common standards – and metrics to assess performance against these standards on a consistent basis, which would appear to be envisaged by strategic objectives 2.5 and 2.6 – should not be under-estimated.

Within the water industry, the development and refinement of metrics for resilience has been – and continues to be – a substantial exercise. Doing so across all organisations with flooding responsibilities will inevitably be a greater challenge, albeit with greater potential benefits. We would be happy to share learning points from our experiences as the Agency considers this point further.

A further point to bear in mind in relation to the water industry in particular is the interaction of any new requirements or obligations with the five-yearly regulatory cycle of price reviews, led by the economic regulator Ofwat.

The current price review, defining obligations to 2025, will conclude later this year. Planning for the 2024 Price Review will start in earnest shortly afterwards, so close co-ordination with Ofwat will be essential to avoid the potential for a disconnect between FCERM expectations of water companies and the economic regulatory framework within which they are required to operate. This will also be relevant to other strategic objectives (for example strategic objectives 1.4, 2.2 and 2.3).

More broadly, we support these objectives being framed as long-term objectives to 2050 and beyond to 2100. As intermediate milestones are considered, it will be important to bear in mind affordability in determining the appropriate pace of movement towards these long-term objectives.

Strategic Objective 1.3

We support the better alignment between the long-term planning activities of RMAs envisaged in measure 1.3.3, but we suggest that this measure, and the strategic objective as a whole, should be bolder.

We note that the draft strategy only makes limited references to the new approach to long term planning for drainage and wastewater, Drainage and Wastewater Management Plans (DWMPs), that has been co-created by a broad-based group of stakeholders, including the water industry, the Environment Agency and Defra.

The design of the DWMP framework explicitly recognises that drainage – and managing associated risks of flooding – is a shared responsibility. Given this, outcomes that maximise benefits to society and the environment can best be achieved by a shared approach to planning, enabling earlier identification of opportunities for the co-creation, and potentially co-funding, of solutions that meet multiple objectives.

However, as we have previously observed to Defra¹, to achieve this, it will be essential that all RMAs actively participate in the development and production of plans. We have suggested that as a minimum, all RMAs should have a duty to co-operate in the production of DWMPs and be statutory consultees for DWMPs.

We therefore suggest that measure 1.3.3. should be bolder, setting a clear expectation that **all** RMAs should actively participate in the production of DWMPs. This should include participation in the production of the first cycle of DWMPs, which will be published in draft in summer 2022 and finalised in 2023.

A further observation is that while we recognise the potential benefits of greater linkage between planning for flooding and planning for drought, we would suggest that the more immediate objective should be seizing the opportunity presented by the new DWMP framework to establish a more joined-up approach to the long-term planning of drainage across the many organisations with drainage responsibilities.

We do agree though that more thought is needed on a long-term vision for an integrated approach to water management at a river basin scale, and there could be opportunities to rationalise and streamline various plans and strategies, to deliver more effective planning, better collaboration and cost savings.

¹ <https://www.water.org.uk/publication/water-uk-response-to-improving-our-management-of-water-in-the-environment/>

Strategic objective 2.2

While we support the goal of environmental net gain, as set out in the 25-year environment plan, the measures under this objective would appear to seek to put responsibility on achieving environmental net gain on RMAs, rather than developers. This is an example where disaggregating expectations of different RMAs may be helpful.

Strategic objectives 2.5 and 2.6

We agree with the objective of ensuring that all infrastructure investment is resilient to future flooding and coastal change; improving the resilience of water industry infrastructure has been a major focus of investment in recent years. However, achieving resilience across all infrastructure investment would require defining what standard, or standards, of resilience is deemed appropriate – so these objectives would seem to be linked to, or even dependent on, the delivery of measures like 1.3.3, although the delivery timescales would not appear to be aligned.

As there are often interdependencies in the resilience of infrastructure, delivering these objectives is likely to need enhanced collaboration and information sharing between organisations and sectors. Where possible, greater alignment of planning and funding cycles would be beneficial, as would ensuring that the regulatory regimes within which RMAs and infrastructure providers operate support a ‘working together’ approach.

Strategic objective 3.1

We support the ambition to nurture a nation of climate champions, and this chimes with the extensive educational activities carried out by water companies to improve understanding of the water cycle, climate change and sustainability. We suggest that this objective should support learning in both primary and secondary schools, and should include actions that individuals can take to reduce the risk of different types of flooding, such as not flushing inappropriate items like baby wipes down toilets.

Strategic objective 3.3

Delivering this objective will require a range of organisations to work together more closely and effectively than ever before. We therefore strongly support the enabling measure 3.3.1, clarifying roles and responsibilities in relation to surface water flooding; it will be important that all RMAs are involved in taking this forward to ensure that there is a common understanding of roles and responsibilities.