Response of the Association of Drainage Authorities

The Association of Drainage Authorities (ADA) raises the following comments to the Consultation on the National Flood and Coastal Erosion Risk Management Strategy for England as provided by the Environment Agency on 24 November 2010.

Summary of Key Comments

A National Strategy for ALL partners
The National Strategy must be broadened in perspective to include all partners. The current document should become more of a National Strategy led by the Environment Agency, rather than a National Strategy for the Environment Agency.

Surface water, Groundwater and land drainage
The description of surface water and groundwater flooding used in the National Strategy do not fully describe the importance of actively managing these risks through watercourse maintenance and land drainage operations. If surface and groundwater levels are not properly regulated, they can put undue stress on riverine systems and cause flooding. Equally, if watercourses are not maintained, flooding can back up raising groundwater levels, or preventing the discharge of surface water systems.

The groundwater risk posed to lowland area and pumped catchments across England are not properly described at present by the National Strategy. Such areas where changes in water levels are directly reliant on the actions of operating authorities to maintain watercourses and pumping represent approximately 10% of England’s landmass. The Strategy therefore fails to fully consider the important role provided by the land drainage activity conducted by IDBs and others that underpins flood risk management in lowland parts of England.

Assessing the significance of small, local and frequent flooding
Without a mechanism or means for assessing the significance of small, local and frequent actual flooding against big, large scale and infrequent potential flooding, local decision making will be unable to fully describe the risks they face, or seek a fair proportion of national funding in the future.

Local decision making vs National consistency
Throughout the National Strategy there is a conflict between requiring decisions to be ‘nationally consistent’ yet ‘locally derived’. No mechanism is put forward to properly explain how both can be achieved within Local Strategies or new LLFA partnerships. This will be especially important where local communities will wish for higher frequency, lower consequence surface water flooding to feature, see above.

The Government, Defra and Environment Agency must recognise that local actions may not be consistent with national decisions and this should be reflected within the National Strategy.
However, encouraging LLFAs to co-operate and co-ordinate their plans within a catchment is supported. This does not mean they will necessarily be consistent though.

**Infrastructure**
The National Strategy must explicitly mention the risks posed to infrastructure. Too strong an emphasis is placed on purely protecting people and homes, rather than livelihoods, infrastructure, food, transportation, businesses on which English life depends. The National Strategy needs to give greater recognition to the long-term economic value of protecting assets such as agricultural land and infrastructure.

**Food security**
The National Strategy must consideration food security to be one of the future challenges to risk.

**Economic sustainability in light of climate change**
Maintaining existing standards of protection where climate change has been shown to be likely to reduce these standards should be assessed. It is not just the amount of funding available that may lead to an increase in risk, but also the potential constraints of current funding appraisal mechanisms for projects, especially in the Treasury ‘Green Book’ guidance/rules on the economic assessment of the justification of maintaining current standards. This should be reviewed and revised by Defra and the EA to enable a wider justification of funding for projects serving the overall resilience of water level management systems.

**Consultation Questions**

**Q1. Is there any additional information on risk that should be considered?**

Information on flood risk will need to be gathered from many sources as Lead Local Flood Authorities develop Preliminary Flood Risk Assessments and Local Flood Risk Management Strategies. The National Strategy must encourage the incorporation of local, historic data on surface and groundwater flooding, where it can be validated to a sufficient quality, to act as an evidence base for these Assessments and Strategies. This will create a greater linkage between the national overview role and the local leadership and operational role.

It will also help to broaden the scope of the National Strategy, which at present focuses very strongly on the core operational role of the Environment Agency, without sufficient consideration of the role of other operating authorities. Example: 3.3 Achieving the objectives – ‘This includes work done by the Environment Agency and others to manage the risks of flooding from rivers and the sea’, why state EA in this sentence without defining others? The National Strategy would therefore be improved by developing a broader ‘all-partner’ perspective.

**Q2. Are there any additional aspects of risk that need to be considered?**

**Surface water and Groundwater**
The description of surface water and groundwater flooding used in the National Strategy do not fully describe the importance of actively managing these risks through watercourse maintenance and land drainage operations. If surface and groundwater levels are not properly regulated, they can put undue stress on riverine systems and cause flooding. Equally, if watercourses are not maintained, flooding can back up raising groundwater levels, or preventing the discharge of surface water systems. Therefore the totality of the risk posed to
properties, national infrastructure, transport systems and agriculture is not sufficiently covered by the National Strategy at present.

The groundwater risk posed to lowland and pumped catchments across England (approximately 10% by land area), where changes in water levels are directly reliant on the actions of operating authorities to maintain watercourses and pumping, are not properly described at present by the National Strategy. The Strategy therefore fails to fully consider the important role provided by the land drainage activity conducted by Internal Drainage Boards that underpins flood risk management in lowland parts of England.

The consideration of future changes to risk (2.3) must also consider the risk to critical infrastructure, food security and how climate change will be better integrated into the economic appraisal of FCERM projects.

**Infrastructure**
Infrastructure is poorly featured in the current Strategy. A recent report in the Quarterly Journal of Engineering and Hydrogeology identified that lengths the British Railway network are at risk of subsidence in the future owing to their construction and their susceptibility to a changing climate, particularly rainfall patterns. Therefore, there will be a strong focus not just on the condition of the transport network’s own assets and drainage systems, but the management of groundwater levels through which these networks travel. This is just one example of how key infrastructure networks are reliant on managing groundwater levels, especially within lowland systems. The risks posed to our power, motorway and water supply networks were drawn in to close focus during the events of June and July 2007.

**Food Security**
Areas served by IDBs, such as the Fens contain the majority of grade one agricultural land in the UK, and produce over 40% of the fruit and vegetables consumed in the country. Pressures on food security are anticipated to grow into the future, and an important aspect of national security will be the capacity to secure some domestic productive capacity to balance reliance on imported foodstuffs. The Fens, by definition, are low-lying, at or below sea-level, and are maintained as high grade agricultural land by a combination of extensive land drainage, water level management and defence against coastal inundation. The damage to such land from salt water inundation includes the cumulative loss of production in subsequent years until the salt can be removed. Typically, this takes up to seven years.

**Economic sustainability in light of climate change**
Maintaining existing standards of protection where climate change has been shown to be likely to reduce these standards should be assessed. It is not just the amount of funding available that may lead to an increase in risk, but also the potential constraints of current funding appraisal mechanisms for projects, especially in the Treasury ‘Green Book’ guidance/rules on the economic assessment of the justification of maintaining current standards. This should be reviewed and revised by Defra and the EA to enable a wider justification of funding for projects serving the overall resilience of water level management systems.

Q3. The Strategy takes into account different sources of risk (for example coastal erosion and flooding from rivers and surface water). How can they best be quantified in a way that helps the assessment of the relative importance of these risks?

The National Strategy fails to offer a mechanism for addressing the local impact of surface water flooding. At a local level, the potential for massive flooding of many properties with a 1 in 100 or 1 in 200 is of academic interest compared to known cases of one or more properties that definitely do flood every ten or five years, or even annually, but which never attract funding on the basis that their number is too small to meet national significance criteria. The current
thresholds for coastal and fluvial flooding, and for the PFRA, are appropriate for preparation for major incidents that happen relatively infrequently in any one area, but do not capture the more localised nature of flooding which is a much more common experience. With the move towards a wider share of national funding on part-funding basis, without a means of assessing the significance of small, local and frequent actual flooding against big, large scale and infrequent potential flooding, it is hard to see in practice how local schemes will achieve a broader share of national funding. In effect, there is a need to be able to assess what is locally strategically important as well as nationally. In line with this, it is important that damage on a local scale that actually has national implications should also be considered, ranging from high grade agricultural land to specific infrastructure with strategic economic, social or cultural significance for England.

Q4. Do you agree with the proposed overall aims of the Strategy? If not, please explain why.

The proposed overall aims (p. 9) appear broadly correct. However, the term ‘people and their property’ implies ‘residents and their homes’, this is not a broad enough consideration of how flood affects peoples lives and livelihoods. This statement needs to more broadly define ‘property’ to covers commercial and agricultural property as well as homes.

The overriding theme within the Strategy matches the Government’s vision to enable greater community engagement and ‘localism’. However, seeking for decisions to be ‘locally derived’ yet also ‘nationally consistent’, appears to be a contradiction in terms. Increasing local decision making may not be compatible with other aims within the Strategy to ensure that Local Strategies and the general direction of FCERM activity in England is aligned, consistent, and co-ordinated, for instance “the Government promotes nationally consistent approaches to assessing and managing flood and coastal erosion risk” (p.25).

ADA supports the sentiment of the Minister’s Forward to the National Strategy when he states that “Many decisions are best made locally, by the communities at risk, and this strategy should provide a framework to encourage and enable local action”. However, this desire must be tempered within the National Strategy to realistically describe the limitations and constraints all organisations will have to work under. For instance, encouraging LLFAs to co-operate and co-ordinate their plans within catchments should be supported. This does not mean they will necessarily be consistent.

This vision also needs support from Defra and the Environment Agency, namely a fair mechanism for assessing the significance of small, local and frequent actual flooding against big, large scale and infrequent potential flooding.

Q5. Are there any additional goals that should be included? If so, what are they?

There needs to be a separate specific aim relating to managing the threat to infrastructure and managing water levels for the well being of the landscape.

Q6. Are there any other guiding principles for FCERM you would include? If so, what are they?

There needs to be greater recognition of the long-term economic value of protected assets such as agricultural land and infrastructure.
The National Strategy needs a guiding principle on the maintenance of systems. The National Strategy should emphasise the need to maintain the design standards of hydrological systems. Fluvial networks need to work as a whole. Primary watercourses must continue to be a national priority as they will dictate the capacity and rate of flow from tributaries or pumping capacity from pumped Internal Drainage Districts. Similarly the arterial watercourses within Internal Drainage Districts and pumping stations must remain a priority within Local Strategies. More broadly the National Strategy needs to put more emphasis on maintaining existing FCERM infrastructure.

ADA supports the guiding principle on sustainability however the statement that working with natural processes “are often more resilient to extreme events” is inaccurate. Working with natural processes will create systems that are more resilient to frequent and low-level events but are very unlikely to provide much protection during extreme events. Engineered ‘naturalistic’ projects such as washlands may provide higher levels of protection but it is wrong to describe these as natural processes.

The guiding principle on sustainability should include a definition of sustainability making it clear that sustainability has three pillars: social, environmental, and economic viability.

Q7a. Are the measures and actions set out in Sections 3.3.1 to 3.3.5 clear? If not, how can they be improved?

Throughout the National Strategy, but especially in these sections, the terms ‘plans’ and ‘strategies’ are used interchangeably and inconsistently. There are now a confusing array of different plans and strategies within FCERM in England and Wales, the commitment in the National Strategy to rationalise the range of different plans is welcomed. Providing a diagram detailing the structure of the current plans and strategy, including River Basin Management Plans, Shoreline Management Plans and Catchment Flood Risk Management Plans would be helpful, the present diagram in Figure 3 is confused and does not show this clearly. Similarly it is misleading to include National FCERM Policy (Defra) at the top of Figure 3 when all the other boxes in the diagram refer to documents. No such policy document has been produced since Future Water and it is ADA’s understanding the Water White Paper is not planning to explicitly cover FCERM.

The ‘Understanding of risk’ section (3.3) is very EA focused and should explicitly mention the specific knowledge and understanding of risk within lowland and pumped catchments provided by IDBs.

Data sharing is mentioned and the Strategy makes a commitment to ensuring that required information is shared and consistent. This is very important to other operating authorities who operate across a number of LLFA areas and will be expected to provide information to all of them. The information operating authorities are asked for should be consistent and in an agreed format, similarly this should also apply to information requested by the Environment Agency. The National Strategy has an important role to play in achieving this and should describe the importance of ensuring common standard for data in order to save money and enable direct comparisons, this will make the Environment Agency’s national overview role in FCERM easier in the long term.

Mention within ‘Achieving the objectives’ (3.3) of creating asset registers is welcome, and further detail about broadly who will be responsible for asset registration would be useful. Again consistency of information and the storage of data by all FRM Authorities as collectively as possible is important. Equally it is important that the system can handle linear as well and single point assets.
Q7b. Do the measures and actions give enough specific information on what will be done and by whom? If not, please can you explain where we need to be more specific?

Much of the work will need to be collaborative, and this will involve a range of organisations as appropriate to local areas. It might be helpful to make this point explicitly rather than seek to provide a definitive list covering all activities and circumstances. In cases where specific responsibilities lie at the door of a particular organisation the document appears to be sufficiently clear.

Q8. Please tell us about any other measures and actions you would include?

The reference to continuing central government funding where sustainable and economically justifiable is welcome (s. 3.3.2, p. 15), but perhaps could be strengthened. Just as greater local resources are expected to be deployed, there is also a case to be made for much greater recognition of the significance of flood risk management to the nation, and there may be an opportunity through the national strategy to seek to maximise the share of national resource that is dedicated to this area of work. Explicit references to supporting agriculture are also to be welcomed as a departure from the former, narrower focus on protection mainly to properties.

Q9. Are you aware of any barriers to the implementation of the measures discussed in Sections 3.3.1 to 3.3.5? If so, how can Defra and the Environment Agency help overcome them?

Funding in light of climate change
Many long term plans in FCERM, such as CFMPs and SMPs have identified existing flood risk management assets where the standards of protection will effectively be reduced by the likely future impact of climate change. These plans and strategies have also shown that the economic appraisal, using current Treasury guidance and rules (the “Green Book”), will not result in sufficient justification to maintain the current standard of protection provided by some of these assets in the longer term (say in 50 years time). The overall aim of reducing flood risk is, therefore, likely to be constrained in the future unless current Treasury rules are reviewed to find a way of being able to justify at least maintaining current standards of protection where climate change may reduce these standards.

Data sharing and storage
It will be important for Defra and the EA to ensure that all flood and coastal risk management authorities use a common standard format for the collection and storage of data and information on flood risk events and assets. This would ensure easier and more efficient data sharing and use of this data and information.

Capacity of LLFAs
ADA is concerned that the capability and capacity of Lead Local Flood Authorities to implement their new FCERM responsibilities under the Floods and Water Management Act 2010 represents a real risk to delivering of the Act’s objectives. The lack of a timetable for the enactment of specific sections of the Act coupled with financial constraints being placed on Local Authorities means that the current resources available within Councils are being lost. The concern is not just that LLFAs need additional financial resource but that in resourcing them the Government does not reduce the financial capacity or independence of other Flood Risk Authorities such as IDBs.
Q10a. How should the relative risks to people, property and business (including agriculture and food production) be taken into account?

It is encouraging that the consultation document appears to imply a more nuanced approach than the present emphasis on numbers of properties at risk. There is clearly a role for the Local Flood Risk Management Strategy here in establishing a prioritised strategy for action at the local level, and this should link closely with SMPs and CFMPs. The question of criteria for assessing relative risk is key, and the local Strategies will need to include a clear statement of the criteria used to prioritise identified flood risk. While it is important to continue to take into account the numbers of people and properties potentially at risk from flood events, this could be supplemented by considerations such as economic value of infrastructure and productive land, not only as a one-off cost, but taking into account the long-term cost of losing or restoring the asset. Disruption of key transport routes and business activity could additionally be factored in as should long term health and environmental damage avoided.

Q10b. How should the risks to people, property and business, and improving and protecting the environment and habitats be balanced?

Improving and protecting the environment and habitats should wherever possible be included within schemes which primarily reduce flood and/or coastal risk ie. Schemes should seek to achieve multi-objectives/benefits. The costs of improving and protecting the environment and habitats often have to be met from flood and coastal risk management funding, such as for the Ouse Washes Habitat Creation Scheme, since the cause of habitat loss or deterioration is usually deemed to be due to how flood and coastal risk is managed. These costs are not often then clearly identified within overall figures quoted for expenditure on flood and coastal risk management, so it is difficult for the wider public to assess whether the balance with risks to people, property and business is being achieved.

Q11a. How far is it possible to distinguish between FCERM benefits and other benefits (for example, to agriculture, land drainage, health, recreation, and the environment)

It is not necessarily essential to make such a distinction so long as it is possible to clearly establish the benefits to agriculture, land drainage, health, recreation and the environment from a specific FCERM scheme or maintenance regime. It is important that these benefits can be factored into criteria for prioritising and funding schemes and flood risk and drainage service provision. These benefits are too often considered on the basis of short term losses or gains and too easily regarded as intangible. Research work should be commissioned by Defra to appraise the relative benefits and how loss of land and land use can be better assessed, leading to a better comparison of relative benefits.

To separate land drainage from flood risk management seems nonsensical and a misunderstanding of the continuum of water level management within which flood risk management and land drainage sit.

Q11b. What is the best way to quantify these additional benefits and how should they be considered in FCERM decisions on priorities and funding?

Certain aspects can be quantified through assessing economic value over a period of time, for example the cost of loss of crops over a specific number of seasons in the event of inundation of agricultural land, and the vulnerability of specific crops to inundation for a set period of time can be calculated in detail. Benefits for land drainage can be calculated in terms of reduced likelihood and impact of inundation, as well as improvements to asset condition and associated
cost savings. Existing measures of e.g. biodiversity and water quality can be applied in the case of the natural environment. Health and recreation benefits are more difficult to quantify, although the extent of additional recreational assets and increased access to such assets would be one way of doing so.

**Q12. How may the current arrangements for emergency response be improved?**

Improved co-ordination and communication links in planning for emergencies and during emergencies is needed. In all situations an overall lead body should be clearly identified to oversee and co-ordinate the response to an emergency, and to be accountable at a local level. Access to detailed information on the location of FCERM assets is critical and can only be strategically realised using a centralised database system shared by all Flood Risk Authorities.

**Q13. Are the responsibilities of the key organisations managing flood and coastal erosion risks clear? If not, please explain why?**

The overall roles are clear. However, the legislation and its interpretation requires some clarification in the case of land drainage powers, particularly between LLFAs and District Councils in two-tier areas.

Describing the funding of IDBs it should be corrected that IDBs are funded by Local Authorities as well as land owners.

**Q14. Please tell us if any organisations or groups should be added and what their role might be**

The list of lead responsibilities in 4.2 must include Internal Drainage Boards and their roles in land drainage and water level management (among others) in areas particularly vulnerable to inundation risk. The statement regarding RFCCs scrutiny of local authority risk assessments should be clarified. This should more broadly define their role, ensuring that Local Strategies by different LLFAs within a catchment are compatible and conducive to good management of the broader catchment.

**Q15. Do the organisations identified in Chapter 4 have the skills and capabilities available to carry out the roles identified above and achieve the required outcomes? In not, how should these be secured?**

It is recognised that many LLFAs currently lack the resource to fully meet the requirements placed on them by the legislation. Defra and the EA have established training programmes and funding streams to assist LLFAs which will gradually feed into strengthening their role. IDBs and the Environment Agency currently have the necessary skills and capabilities required to fulfil their roles, however all authorities must enhance their capacity for joint cooperative working, and to ensure that delivery of their strategic and operational roles increasingly link up across the board range of flood risk and drainage management functions. LLFAs could also consider delegating work to IDBs.

In the present financial circumstances the key challenge for all authorities will lie in securing sufficient funding to fully resource their existing and new roles. While there are clearly opportunities for efficiency savings from improved co-operation and co-ordination, there are outstanding questions such as the potential for transferring staff and funds from one organisation to another where a function has been transferred by the legislation. In general terms, it will take some years for authorities to build up their resources to fulfil all aspects of the
legislation to a reasonable degree, and it is very important that the expectations of Government and local people are managed accordingly.

**Q16. Do you agree with the overall objectives for the proposed changes to the funding system as set out above? If not, please can you explain your answer**

The overall objectives are right. The potential for unlocking broader access to national funding through matching with local funding is to be welcomed. Encouraging more local choice will require the development of funding criteria with greater flexibility towards local circumstances. It is also vitally important that Government does not see increased local funding and responsibility as a means for withdrawing from funding for flood risk management. The principle of the beneficiary pays, which was enshrined in the Pitt Review, needs to be viewed in the light of situations where benefit is provided well beyond the local area. Work undertaken on a watercourse in a particular location may well benefit communities for a long distance upstream or downstream, often in different LLFA jurisdictions. In this regard, quite local schemes can provide a national or at least regional benefit, and there will need to be flexibility in the funding scheme to take account of this.

Consideration of the potential impact of increasing risk due to climate change must be fully integrated with the decision making and funding delivery process.

**Q17. Please tell us about any other options for prioritising and justifying maintenance and managing situations where ongoing maintenance cannot be justified from national budgets**

The current document focuses on EA maintained systems. There are options to be explored for justifying maintenance and management where a situation may be of very significant local impact but minimal wider consequence, but even in these cases there may well be an argument for some support from national funding. What appears to be missing from the National Strategy is a positive commitment, where work is proposed, to weigh up the effect on life and property of not doing work. This would involve a wider consideration of cost and benefits.

Current Treasury “Green Book” appraisal rules may restrain the consideration of benefits provided by projects especially in relation to climate change. These rules must be reviewed to allow for circumstances where increased maintenance or works will be needed to sustain standards of protection owing to the impacts of climate change. Increased funding alone will not avoid risk increasing over time if current Treasury rules are not revised to enable a wider justification of projects serving the overall resilience of water level management systems.

**Q18. How often should local strategies be reviewed and who should be involved in the review?**

There are a range of existing and emerging flood risk management strategies and plans, all of which have timetables for review. There is potential here to ensure that all of these reviews are conducted in a logical sequence so that updates and changes to one can influence and enhance linkages with others. At the very least, given that the PFRA is due to be reviewed in 2017, it seems logical that, as the basis for the National FCERM Strategy, review of national and local strategies and flood risk assessments should follow this cycle. The review of the Local FRM Strategy should involve all those organisations and groups involved in the development of the Strategy in the first place, including public participation.
Q19. Should reports on the implementation of the national strategy assess progress against specific milestones and activities? If so, what should these specific milestones and activities relate to?

It would be difficult to measure progress without some sort of milestones, however these should be kept high-level and few in number – relating to key priorities rather than acting as drivers for action at local level.

Q20. There are two levels of information: statutory guidance and advice. Are there any areas where we are proposing to provide advice where you consider it should be statutory (that is provided as guidance)? If so, please explain why.

ADA considers the following areas should receive statutory guidance in recognition of their importance to managing and co-ordinating flood risk management:

- Register of FCERM assets should be covered by statutory guidance to ensure that it is implemented in a standard methodology by all flood risk authorities. Ideally this should utilise a common database of assets as being developed through the EA’s Creating Asset Management Capacity (CAMC) Project.
- SuDS should also receive statutory guidance to help ensure acceptance and implementation. This should ensure that SuDS are designed with appropriate access for maintenance in the future.
- The methodology for the granting of consents under alterations made by the Flood and Water Management Act to the Land Drainage Act must have statutory implementation and guidance.
- The monitoring of high risk reservoirs should have essential safety advice issued with statutory support.

Q21. What primary objectives in FCERM should the strategy achieve over the next 12 years?

Suggested primary objectives:

- Establishing a long-term national vision for FCERM as a key component of national security policy, including its contribution to climate change adaptation, planning strategy, economic and social well-being and ecology;
- Rationalisation and joining-up of the Strategies, Plans and policies currently existing for FCERM;
- Improved public awareness and understanding of flood risk and drainage.

Q22. Is the risk-based approach to FCERM appropriate and does the approach suggested take account of the main risk factors?

The risk-based approach is appropriate for large-scale set-piece projects, particularly when dealing with high levels of risk at long return periods. However, for surface water and groundwater flooding and for essential maintenance of watercourses it is currently less well suited. There needs to be a way of accounting for the significance of well-maintained drainage systems in preventing long-term flood risk from damaged or underperforming infrastructure, as well as for the local impact of small numbers of properties which are known to flood regularly, as opposed to large numbers of properties which might flood on a one in 100 or 200 year return period. The approach is not suited for funding the significant responsibilities arising from duties such enforcing and consenting, investigating flooding incidents, establishing and maintaining asset registers, designating and monitoring assets and their condition. These activities must be
undertaken regardless of local levels of risk, and cannot be assessed adequately on a risk-based approach alone.

The elements listed on pp. 4-7 of the draft National Strategy do cover the main risk factors, however, threats to infrastructure and food producing land should also be introduced here. There also needs to be a recognition that while major national incidents of surface water flooding are comparatively rare, most people’s practical experience of flooding comes from surface water flooding at a localised level, on a lesser return period than 1 in 100. The best example of this is the single property, or small group of properties, that flood every few years.

Q23. Are there any barriers to local action that need to be removed or reduced?

There is a fundamental contradiction throughout the National Strategy that decisions should be ‘nationally consistent’ yet ‘locally derived’. The Strategy does not put forward a mechanism to properly explain how both can genuinely be achieved, especially when local community concerns will often focus around the higher frequency, lower consequence surface water flooding the PFRAs will not fully consider. The Strategy therefore needs to ensure a greater level of freedom to consider evidence on flooding from all sources, especially operational local knowledge from other operating authorities.

The RFCC could play a powerful role in promoting co-ordination between neighbouring LLFAs to ensure that local levy funding can be used to best effect where catchments cross administrative boundaries and a joint approach between LLFA areas is required.

Other key barriers that must be overcome include:
- an overarching lack of funding due to the present economic climate. Particularly Government funding which has already been cut for capital projects by 15%.
- the skills gap. There is a lack of trained and skilled people entering flood risk management with sufficient knowledge to assist LLFAs with their new role as well as continue to support the needs of IDBs and the EA.
- the lack of sufficiently skilled technical staff within Defra. This function used to be achieved via Defra’s ‘Regional Engineers’, which were cut several years ago.
- the Public Bodies Bill. The Bill leaves many public bodies at risk of changes to their governing legislation without full Parliamentary consideration or consultation. Decisions made with limited consultations and debate by Ministerial order put at risk the services offered by these bodies and their ability to work in partnership.