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Blueprint FRMP Response

Introduction

The Blueprint members welcome the opportunity to respond to the English draft Flood Risk Management Plans (FRMPs) and our response provides overarching comments to all ten regional plans. In general we believe that the plans present a useful summary of fluvial, coastal and reservoir flood risk and proposed management and we leave the detail to be commented on by those with more direct local knowledge. However, there are a number of important points we would like to make on the plans and measures.

Key Points

- Blueprint believe that measures can and should deliver benefits for the economy, environment and society and that measures that benefit all three need to be prioritised. We are therefore disappointed to see the large number of measures proposed which are marked as only delivering on the economy. Delivery of measures needs to consider how multiple benefits can be optimised to deliver not just for flood protection but for Water Framework Directive, Biodiversity 2020 and other objectives, including local green space and health and well being priorities. Measures that provide benefits in this way offer overall cost efficiency savings as well as benefits to people and wildlife. Examples of such measures include sustainable drainage systems, upland restoration and sustainable land management.

  The Flood Risk Management functions of the Environment Agency, local authorities and Internal Drainage Boards have an important role to play in making sure that this happens. It is vitally important to ensure that England's network of protected areas is maintained. The flood authorities – primarily the Environment Agency – must take a leading role to protect wildlife sites against flood damage and ensure that, following coastal squeeze, new habitat is created in-line with Government commitments (e.g. Biodiversity 2020). We also believe it is important that there is more assistance to help people adapt to changes in flood risk. We welcome the work being done to plan for climate change, but believe more could be done to help communities and economies adapt when further flood defences are unlikely to be funded. We recognise that flood management authorities have limited and shrinking budgets, but consider these to be core government responsibilities.

  We believe additional objectives within the plans should include a requirement to consider how measures can achieve multiple benefits as well as objectives to deliver biodiversity and wider environmental health benefits in line with Government's "Natural Environment White Paper". We welcome the inclusion of Biodiversity Action Plan targets within the Severn District objectives and the enhancement of biodiversity in the Thames

District objectives and would like to see these incorporated within other district objectives.

- We are glad to see these draft plans address both fluvial and coastal flood risk management, but would also like to see them cover all sources of flooding and the management of coastal erosion. The exclusion of measures to tackle surface water flood management is a particular problem, as one of the aims of these plans is to provide an overview of all flood risk and its management. Surface water flooding provides a cumulative impact on other forms of flooding. Measures acting upon surface water flooding can therefore have a positive effect on fluvial flood risk. In order to formulate an accurate picture of flood risk and management in a region it seems imperative that surface water should be considered.

  Surface water flood risk is less well managed than flood risk from rivers or the coast and crosses unitary authority boundaries. Management at a catchment scale would secure major benefits to flood risk and cost efficiencies.

  We remain extremely disappointed that the government has recently rejected key opportunities to address surface water flood risk; in particular through the proper implementation of Schedule 3 of the Flood and Water Management Act and substantial funding for sustainable drainage retrofitting in AMP6 or local authority plans. It is therefore even more important that FRMPs include surface water management measures due to increasing risk of surface water flooding from increased development, a struggling sewerage system and climate change.

  Sustainable drainage systems (SuDS) not only alleviate surface water flooding but can also help towards Water Framework Directive delivery as they can improve water quality of run-off, preventing pollutants such as hydrocarbons from entering water courses. If designed appropriately SuDS can provide environmental, well-being and other societal benefits. SuDS can increase people's connection with nature and provide valuable wildlife habitat within an urban environment.

- Blueprint believes that there should be more measures than currently proposed that take a catchment scale, holistic approach. Although hard engineered structures will always be the main form of flood management in England, there is considerable potential in natural flood management measures. These should be more rapidly investigated and more widely rolled out, wherever they provide a better environmental, societal and economic option. Such natural flood management measures tackle the root cause of flooding rather than the majority of others which focus on treating the symptoms and ultimately result in the need for continued investment and spiralling costs. Small and medium scale natural flood management measures such as those demonstrated through the 'Pitt Review' pilots (e.g. Holnicote, Pickering) have the potential to both reduce overall flood risk and complement more traditional engineering approaches. In addition, such

approaches are much more amenable to delivering other benefits such as biodiversity, carbon storage or greenspace.

We feel that the plans lack measures on upland habitat restoration and measures tackling land use and management which can be a significant source of soil erosion and subsequent nutrient enrichment which can cause silting up of water courses. Upland restoration can provide a hugely valuable water storage function and healthy uplands can also slow flow and reduce flood peaks[1,2,3]. We welcome those measures which do take a whole catchment approach; however, we refer back to our previous point in that they very much look towards relieving flood management only rather than at how the measures can achieve a range of benefits.

- We are concerned that there is a lack of understanding around natural flood management measures, especially amongst the general public and we believe that FRMPs offer an opportunity to assist in raising awareness and communication of the benefits that natural flood management provides reducing concerns around any reduction in maintenance of hard flood defences.

  As stakeholders ourselves, and as people who discuss flood management projects with members and other citizens, we think that government could do a better job of communicating and consulting on local strategies and schemes. This doesn't mean delivering everyone's wish list – but communities and stakeholders must be made aware of potential changes to flood management, told what we can realistically influence, and helped to adjust where necessary. In some cases this is done excellently, but where it is not it excludes many stakeholders – and in many places makes it politically impossible for flood management authorities to make changes recommended by Shoreline Management Plans, Catchment Flood Management Plans and Flood or Coastal Risk Management Strategies. The review of activities by these plans and strategies is one of the greatest strengths of the English flood management system, so it is vital that problems with communication and adaptation are fixed.

- Finally, we welcome efforts to align the FRMP consultation with the River Basin Management Plan consultation, and suggest that in future there may be benefit in further integrating the two. The linkages between the environmental objectives of flood risk

[1] Exeter University (2014) Peat bog restoration work holds back water (downloaded 22/12/2014) http://www.exeter.ac.uk/news/featurednews/title_355403_en.html

[2] Brown, L.E., Holden, J. & Palmer, S.M. (2014) Effects of Moorland Burning on the Ecohydrology of River basins. EMBER project. University of Leeds http://www.wateratleeds.org/fileadmin/documents/water_at_leeds/Ember_report.pdf

[3] Montgomeryshire Wildlife Trust (downloaded 22/12/014) Pumlumon Project http://www.montwt.co.uk/what-we-do/living-landscapes/pumlumon-project

management planning and those of the Water Framework Directive should be made clearer, encouraging stakeholders to think about the synergies between the two areas of work, and promoting a more holistic consideration of water management more generally.

Blueprint for Water coalition

The Blueprint for Water is a unique coalition of environmental, water efficiency and fishing and angling organisations that is calling on the Government and its agencies to set out the necessary steps to achieve "sustainable water" by 2015. The Blueprint for Water is a campaign of Wildlife and Countryside Link. More information is available at www.blueprintforwater.org.uk

This briefing is supported by the following ten organisations:

- Angling Trust
- National Trust
- Marine Conservation Society
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- The Rivers Trust
- The Wildlife Trusts
- Wildfowl & Wetlands Trust
- Woodland Trust
- WWF

Wildlife and Countryside Link
January 2015

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