

Consultation on draft Flood Risk Management Plans 2021-2027

Blueprint for Water Response – January 2022

Wildlife and Countryside Link is a coalition of 64 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

Blueprint for Water, part of Wildlife and Countryside Link, is a unique coalition of environmental, water efficiency, fisheries and recreational organisations that come together to form a powerful joint voice across a range of water-based issues.

This response is supported by the following Link members:

- Angling Trust
- British Canoeing
- Floodplain Meadows Partnership
- Friends of the Earth England
- Institute of Fisheries Management
- National Trust
- Rivers Trust
- RSPB
- Salmon and Trout Conservation
- The Wildlife Trusts
- WWT

For further information, please contact Wildlife and Countryside Link:

Ellie Ward

Policy and Information Coordinator

E: eleanor@wcl.org.uk

Please tell us if you are responding as an individual or on behalf of an organisation or group.

On behalf of Blueprint for Water, part of Wildlife and Countryside Link.

What is your email address?

eleanor@wcl.org.uk

Can we publish your response?

Yes. We consent to our response being shared with partners who have worked to develop the draft FRMPs.

Summary

Blueprint for Water are responding to this consultation into the draft Flood Risk Management Plans as practitioners and experts in nature-based solutions. We do not have the capacity to consider all the measures and details within the ten Flood Risk Management Plans. As such we propose that all the plans meet the following recommendations:

- Deliver natural flood measures where feasible.
- Design measures to deliver multiple benefits, in particular for nature and biodiversity.
- A strategic approach that ensures the best measures are delivered in the best places, supporting multiple benefits, and guaranteeing a complete range of natural flood management (NFM) measures being delivered rather than focusing on ease of delivery or short-term goals. This should be achieved by taking a natural capital accounting approach to considering costs and benefits over the whole life of a scheme.
- Feed into and reflect Local Nature Recovery Strategies (LNRS) and vice versa.
- Ensure Risk Management Authorities (RMAs) use experts to undertake extensive community engagement and involvement prior to starting practical measures to secure community buy in and ownership.
- Particularly in urban areas, we want to see RMAs prioritise blue spaces to reduce flood risk and improve health and well-being, with RMAs playing a role in driving improvements through planning, regeneration and local nature recovery strategies.
- Ensure plans and measures are resilient to climate change. Using nature-based solutions as part of a hard engineering scheme adds capacity and resilience.

We support catchment-based approaches and schemes such as The Thames Valley Flood Scheme. Options being investigated within this scheme include large scale floodwater storage, and natural flood risk management measures such as creating wetlands, improving soils, altering crop management and planting trees, to help retain or slow the flow of water. Where traditional defences are uneconomic, these catchment solutions bring wider benefits – and so can draw in wider sources of funding from a range of partners and beneficiaries. These include:

- The creation of more opportunities for people to access and enjoy green and blue spaces for recreation, such as paths and open spaces – supported by green infrastructure funding.
- The creation of new habitat – through land management payments such as E.L.M. or developer funding for biodiversity net gain.
- The reduction of water entering sewer systems, reducing the risk of knock-on sewer flooding – funded by water companies.

The scheme's aims recognise this, the vision being to reduce flood risk, enhance the environment, support sustainable economic growth, and improve health and wellbeing for residents. Establishing and supporting such approaches – which recognise and factor in the opportunity to deliver multiple benefits by blending funds from multiple partners – are a key way in which Government can facilitate the recovery of England's waters.

Questions - strategic measures

5. The draft FRMPs set out a number of strategic measures to manage flood risk in identified flood risk areas. Do you agree with these measures?

Totally

Partially

Not at all

Don't know

Please comment further:

We welcome that the 18 nationally consistent draft objectives aim to reduce the adverse consequences of flooding on the environment, and align with the National FCERM strategy ambitions of increasing resilience and adaptation to flooding and coastal change. Blueprint members advocate working with natural processes through natural flood management (NFM) to increase climate resilience and adaptation, whilst benefitting biodiversity.

Objectives 8-10 under 'minimising the consequences of flooding for the environment' should be more explicit in the scale of Natural Flood Management (NFM) work to be achieved. Currently there is reoccurring risk that NFM techniques are pushed aside in favour of hard engineering solutions, despite the number of successful NFM schemes which have been piloted. Explicit targets are needed to incentivise and ensure that NFM is adopted in flood alleviation schemes to ensure the wider benefits to the environment, as well as human health and well-being are realised.

NFM solutions can provide cost-effective and sustainable means of adapting to climate change impacts and providing benefits to biodiversity. NFM presents a shift from a historically localised and reactive approach to flood risk management towards a strategic, multi-benefit, and catchment-based approach. NFM is achieved by adopting a strategic, source to sea (catchment) approach, protecting and working with natural systems, habitats and processes, and utilising soft engineering techniques; in this context RMAs should be encouraged to consider the full range of NFM techniques, from localised installations such as 'leaky dams', to habitat- and land-management practices that improve the water-holding capacity of the landscape across large areas.

The national measures directing RMAs to work together to 'identify a programme of nature-based solutions in their area' (Measure ID 0299999010) and the EA to work with others to 'maximise the use of nature-based solutions in England' (Measure ID 0299999045) could help to meet many of these objectives, yet both are unspecific. We would like to see NFM measures being considered as a component of all flood schemes, and implemented where appropriate.

Similarly, the national measures relating to achieving wider environmental benefits (Measure ID 0299999015) provide no detail on how RMAs should ensure that *meaningful* links with Local Nature Recovery Strategies are made; this should ensure not only that 'new and restored habitats contribute to reducing flood and coastal risk' as set out in the FRMP objectives, but also that all schemes, whether nature-based or not, take account of local biodiversity priorities in order to avoid or mitigate environmental damage, and where possible contribute to the enhancement of the local

environment. Close links between FRMPs and LNRSs will better enable RMAs to ensure that measures are designed to deliver multiple benefits, in particular nature/biodiversity, from the outset.

6. The draft FRMPs set out a number of strategic measures to manage flood risk outside of identified flood risk areas. If applicable to the FRMP you are responding to, do you agree with these measures?

Totally

Partially

Not at all

Don't know

Please comment further:

We agree that it is vital to manage flood risk outside of identified flood risk areas in order to manage the movement and storage of water at a catchment scale, which is intrinsically linked to flood risk. Whilst not commenting on specific FRMP measures, we support a catchment-based approach to flood risk management in order to improve resilience to flooding. Catchment-scale consideration should become the norm, applied as a national or RBD-level measures, rather than being considered only in specific Strategic or Flood Risk areas – whilst this is implied within some of the national measures, it is not explicit. Catchment-scale solutions will help manage rainwater more naturally through the catchment by controlling run-off, reducing peak flows in rivers and drainage systems, and providing areas for flood storage.

Large-scale nature-based projects should be funded to deliver mutually beneficial outcomes for nature, people and climate, including implementation of NFM at a catchment scale. The combination of solutions, such as tree planting, peatland restoration and wetland creation can provide flood alleviation benefits while helping tackle the climate and nature crises. There needs to be a rapid upscaling in the use of these tried-and-tested solutions, to help address challenges to the water environment and deliver multiple co-benefits for people and nature.

Connections and climate change

7. To what extent do you think the objectives and measures set out in the draft Flood Risk Management Plans (FRMPs) support and contribute to the delivery of the ambitions in the national Flood and Coastal Erosion Risk Management Strategy (FCERM Strategy)?

Totally

Partially

Not at all

Don't know

Please comment further:

Blueprint welcomed the shift in focus within the national FCERM strategy from one of 'protection' to one of resilience - including natural flood management and good spatial planning, with climate adaptation at the forefront. We were also supportive of the FCERM setting out a strategic overview until 2100. However, it is vital that supporting plans such as FRMPs and SMPs have robust deliverables to reach these goals. It is not clear in the current draft FRMPs how the measures will deliver the long-term 2100 goals through actionable milestones.

Within the plans we welcome the four national draft objectives and national measures relating to nature-based solutions. However, whilst these do reflect the ambition of the national FCERM strategy, they could go further.

The FCERM seeks to mainstream nature-based solutions yet there is no specificity in the FRMP objectives to direct RMAs to use nature-based solutions where they are feasible. In addition, although one of the national measures for the Environment Agency calls to maximise opportunities for nature-based solutions, the national measures for Lead Local Flood Authorities is much weaker with the measure saying "may work to identify a programme of nature-based approaches" (Measure ID 0299999010). We recommend this is changed to "should".

8. To what extent do the measures in the draft FRMPs help to deliver multiple benefits for both flood risk management and the wider water environment?

Totally

Partially

Not at all

Don't know

Please comment further:

We support the national measures (Measure ID 0299999015, Measure ID 0299999042) that specify delivering multiple benefits and linking to other plans such as river basin management plans.

The national measures recognise the importance of working across local authorities, businesses, and communities to manage flood risk. Whilst national objective 8 references that risk management actions should help to achieve environmental objectives set out on the River Basin Management Plans, this could more specifically reference biodiversity recovery and the use of the biodiversity net gain target as written into the Environment Act. Regarding the measures promoting Biodiversity Net Gain, we feel that FRM schemes should first seek to avoid damage to the natural environment, and then to deliver a net benefit to biodiversity, ideally through the scheme itself (rather than by seeking to deliver net benefit elsewhere, or by 'purchasing' benefit delivered by others). We also suggest that this approach should apply across all schemes included in the plans, rather than just those

where BNG is a requirement of planning, and that each scheme should provide justification setting out how damage will be avoided and biodiversity gain then maximised.

Nature-based solutions such as wetlands can be put in place which not only reduce the flow of water but also improve the quality of the water. It is important that factors like these are taken into account during decision making and support the case for natural flood management interventions. This is also relevant to the role of nature-based solutions in coastal erosion risk management. The creation of saltmarsh, for example, through managed realignment provides multiple benefits including storing significant volumes of carbon. Although the measures promote the use of nature-based solutions, we are unclear as to whether the process for deciding on flood interventions adequately takes a natural capital approach and a cost benefit approach that gives weight to the full range of benefits.

Measures do not currently reflect the role of FRMPs in delivering against the targets set out in the Environment Act. This should be amended, in particular the target to halt species decline by 2030 and the water quality targets.

9. To what extent do you agree that the draft FRMPs consider the likely impacts of flood risk associated with climate change?

Totally

Partially

Not at all

Don't know

Please comment further:

The national objectives relating to climate change guidance, enhanced mapping, warnings, working with research partners, and raising awareness amongst those at risk all contribute to the above aim, and are welcome.

However, the objectives consistently reference the importance of having a long-term vision to become resilient to future risk of flooding and coastal change, which is vital in meeting the challenges created by the increasing pressures of extreme weather events and sea level rise caused by climate change. We would like to see more detail on how the Environment Agency plans to manage and advise on the threat of habitat loss due to coastal erosion of the protected area network. Coastal erosion and sea level rise is already threatening key habitats around the coastline of England, and we wish to understand how the Environment Agency plans to advise landowners and authorities about how to manage this significant risk to biodiversity hotspots. Coastal habitats can play a key role in flood and erosion protection, but this needs to be planned and delivered strategically to ensure that both biodiversity and flood / erosion risk management benefits are secured, working with natural processes to create the space for roll-back of habitats and secure compensatory habitat.