

# Reforming our approach to floods funding

**To what extent do you agree with our overall proposed approach to funding FCERM projects as set out in Part 3?**

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Don't Know

Agree.

**Please explain your answer.**

This approach would be of benefit to smaller schemes where it may be difficult to find partnership funding.

**Are there any other approaches to funding flood projects you feel would be effective?**

Too much detail is required to support the implementation of smaller schemes, which can outweigh the costs to actually build the scheme.

Sometimes the money spend on data collection and studies is disproportionate when compared to the implementation costs and a more simplified approach is required particularly when schemes are being delivered by local authorities.

A great deal of time is spent by officers in preparing reports and data for gateway stages and forms when in reality a single stage for smaller schemes may be appropriate to enable a Contractor to be procured. When a scheme is viable, yet bureaucratic hurdles are presented this can be difficult to explain to local residents in need of protection.

**To what extent do you agree that Principle 1 - the first £3 million of eligible project costs to be notionally provided by Defra through a Contribution Free Allowance - described in Part 3 is an appropriate way to fund FCERM projects. As set out in Part 3, the allocation of funding to a project using these principles would be confirmed once the project has passed through the programme prioritisation step (see Part 4).**

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Don't Know

Strongly Agree.

**Please explain your answer.**

N/A

**To what extent do you agree that Principle 2 - a single basic rate of Defra funding to be 'notionally' applied to all new FCERM project costs above the £3 million Contribution Free Allowance, regardless of their outcomes - described in Part 3 is an appropriate way to fund FCERM projects. As set out in Part 3, the allocation of funding to a project using these principles would be confirmed once the project has passed through the programme prioritisation step (see Part 4).**

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Don't Know

Neutral.

**Please explain your answer.**

We are unlikely to be involved with schemes on this scale.

**To what extent do you agree that Principle 3 - All FCERM refurbishment projects are fully funded (refurbishment projects are those that restore existing assets that have fallen below designed levels of operation or are at the end of their design life) - described in Part 3 is an appropriate way to fund FCERM projects. As set out in Part 3, the allocation of funding to a project using these principles would be confirmed once the project has passed through the programme prioritisation step (see Part 4).**

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Don't Know

Neutral.

**Please explain your answer.**

N/A.

**Do you agree Property Flood Resilience (PFR) (resistance measures), as described under 'Other considerations' in Part 3, is an appropriate option to include in government funded flood risk mitigation?**

- Strongly Agree
- Agree
- Neutral
- Disagree

- **Strongly Disagree**
- **Don't Know**

Agree.

**Please explain your answer.**

This funding should be allocated to the LLFA to distribute based on need and local knowledge.

**Do you think that the overall proposals for funding flood and coastal erosion projects will support the right amount of natural flood management? Are there other proposals you think we should consider?**

- **Agree**
- **Disagree**
- **Don't Know**

Agree.

**Please explain your answer.**

Natural flood management scheme funding can often be included in flood alleviation schemes. NFM funding should be made available to District Councils.

**Do you believe there are any benefits and/or challenges of the current 2012 rule that have not been identified in Part 3?**

The annual allocation of funding can provide a degree of uncertainty in projects needing more than one year for delivery. Letters provided to authorities confirming allocation do not highlight the steps required to obtain funding sufficiently which causes issues within Councils as these often are taken as success of funds by some senior management and Councillors when in reality they are often only indicating that a project can proceed to work towards the next gateway. Funding is then not guaranteed for the following year which is sometimes the scheme delivery year.

**Do you think a similar provision to the '2012 rule' remains necessary under the new approach?**

Allocation letters need to be more specific as to the requirements that need to be followed to obtain funding.

**Please outline any potential effects of the proposals outlined in Part 3 on groups with a protected characteristic.**

N/A.

**Which of these options do you think that FCERM projects should be prioritised for delivery.**

- **Overall FCERM project value for money and flood risk (approach 1)**
- **Bolstering projects that achieve priority outcomes (approach 2)**
- **Incentives to secure additional partnership funding contributions (approach 3)**
- **None of the above**
- **Other**

Incentives to secure additional partnership funding contributions (approach 3)

### **Please explain your answer.**

It is sometimes difficult to obtain funding for flood alleviation schemes for small communities particularly where more frequent flooding occurs, but the number of properties effected is low. Sometimes smaller measures can provide large benefits but would not necessarily meet funding requirements or the level of evidence required to prove the benefits would cost more than the benefit itself.

There may be a case for incorporating other measures such as sustainable drainage, NFM or property level protection and a balanced approach between Option 2 and 3 may be beneficial.

Sometimes some funding for small schemes can be sourced elsewhere which needs topping up to enable a scheme to go ahead. Providing funding as a top up would be of assistance, but supporting application information would need to be proportionate to the benefit. Access to the funding should be readily available with a short form application procedure particularly for small projects.

**Please rank in order of preference the 5 potential outcomes that could be prioritised through prioritisation Approach 2 (with 1 being the highest preference and 5 being the lowest preference):**

- **Supporting economic growth and the wider economy**
- **Deprived areas**
- **Specific types of flood resilience intervention, such as natural flood management**
- **Specific types of communities, e.g. rural or coastal communities**
- **Local choice**

- 1) Specific types of communities, e.g. rural or coastal communities.
- 2) Specific types of flood resilience intervention, such as natural flood management
- 3) Local choice
- 4) Deprived areas
- 5) Supporting economic growth and the wider economy

### **Please explain your rankings.**

We have ranked economic growth and wider economy at the lowest as this shouldn't be the driver to support existing communities. The need for flood protection should be the main driver and there are specific communities where investment is needed. Flood defence measures shouldn't be used to bring forward undeveloped land for development that is currently needed for flood storage just to achieve economic growth and this would be in contradiction to the aims of the National Planning Policy Framework.

Whilst the type of intervention is important and therefore weighting towards more natural or sustainable measures is beneficial, this shouldn't be at the expense of ensuring a suitable level of standard can be achieved and sometimes a mixed approach will be needed. Designers should however ensure that more sustainable approaches are assessed as part of the solution.

**Are there any other outcomes we should consider prioritising through prioritisation Approach 2?**

Measures that would reduce surface water runoff from entering the existing surface water infrastructure whether a watercourse or culvert or sewer. This could be from various land uses from farmland to private residential properties. Promoting and providing funds for storage at or close to source would be of benefit not only to flood risk reduction but also in raising awareness.

Greater funding should be made available to retrofit SUDS into existing communities. The cumulative impact of small changes can provide a large overall benefit.

**Please outline any potential effects of the proposals outlined in Part 4 on groups with a protected characteristic.**

Works in rural communities can provide major benefits downstream.

**How confident are you that the transition arrangements described are sufficient to ensure continued delivery of projects nearing construction and/or projects already under construction?**

- **Very Confident**
- **Confident**
- **Neutral**
- **Not confident**
- **Not confident at all**
- **Don't know**

Neutral.

**Please explain your answer.**

This will depend on the approach that is adopted and type of scheme being put forward. It could have a positive or negative impact. Funding for projects already under construction should be protected. Existing schemes that are at design / scoping phase should be required to move on the new assessment approach as soon as possible to avoid abortive work.

**Please outline any potential effects of the proposals outlined in Part 5 on groups with a protected characteristic.**

This should provide a benefit.

**To what extent do you agree with the four proposed principles guiding our work on alternative sources of funding (outlined in Part 6) – viability, fairness, sustainability and efficiency?**

- **Strongly agree.**
- **Somewhat agree**
- **Neutral**
- **Somewhat disagree**
- **Strongly disagree**
- **Don't know**

Somewhat agree.

**If you disagree with any of the proposed principles in the previous question, please explain why.**

Flood defences should be used as a last resort to free up land for housebuilding targets. Flood defences rely on ongoing maintenance and design levels are subject to change due to the potential effects of climate change.

**To what extent do you agree with the five areas we are planning to explore to identify alternative sources of funding (outlined in Part 6) – insurance sector, water and sewerage**

**companies, land and property value uplift, local funding and building on the existing system?**

- **Strongly agree.**
- **Somewhat agree**
- **Neutral**
- **Somewhat disagree**
- **Strongly disagree**
- **Don't know**

Somewhat agree.

**If you disagree with any of the proposed areas in the previous question, please explain why.**

Land and property value uplift needs to be carefully considered to ensure the appropriateness. A reliance of flood defences to protect currently non existing developments may cause future issues. Flood defences have a design limit, maintenance needs to be considered, there is a risk of complacency and climate change may have an impact.

**Are there any areas that you feel we are missing? Please explain your answer.**

No Response.

**Please provide any further feedback on our proposed areas for alternative sources of funding (insurance sector, water and sewerage companies, land and property value uplift, local funding and building on the existing system), including any additional evidence you would like us to consider in support of your answers.**

In relation to water and sewerage companies, this needs to be carefully considered to avoid unreasonable increases in bills to customers.

**Please outline any potential effects of the alternative sources of funding work on groups with a protected characteristic.**

Some rural communities are not served by formal drainage facilities, so they would not receive any benefit from water company investment.

**In your opinion, how can Regional Flood and Coastal Committees be empowered to deliver greater local choice in flood investment programme decisions?**

The provision of direct funding to regional committees would allow greater local choice to be delivered using local knowledge through catchment based partnership decisions. The input from flood risk officers at local level into decision making could be of benefit.

**What changes do you believe are needed to support and enable Regional Mayors to enhance partnership working with other organisations for flood risk management?**

A sub committee of LLFA's for the regional mayor area would support and enable Regional Mayors to enhance partnership working. This would seem to replicate some current working but over a larger geographic area.

**How do you believe Regional Mayors can enable integrated approaches to strategic flood planning? What changes are needed to achieve this and how can risks be managed?**

Regional Mayors should take advice from technical officers through an LLFA sub-committee.

**In your opinion, how can Regional Mayors support or enhance governance arrangements for Local Flood Risk Management Strategies? What changes are needed to achieve this and how can risks be managed?**

Sufficient funding needs to be provided to maintain existing infrastructure as well as for flood risk reduction activities. There is a wide network of local authority owned culverts, highway sewers and drains that require sufficient funding to allow maintenance at a suitable frequency to provide a suitable standard of service.

**In your opinion, what are the risks and opportunities of devolving some of the flood funding budget to either local or mayoral authorities in the longer-term? How could risks be mitigated?**

In principal greater funding being devolved to local authorities is considered beneficial as it will allow better access to projects being funded.

Considerations are:

- 1) How should funding be distributed as flood risk varies by authority.
- 2) How can funding be suitably ring fenced for flood risk activities.
- 3) What timeframe would funding be offered over? Some projects take longer than a year to realise for example.
- 4) Risk could be mitigated by having it ring-fenced and the ability to accrue for larger projects over time periods and a suitable sub-committee to oversee.

**What changes do you believe are needed to enable and encourage Regional Mayors to consider flood risk management when making revenue raising and spending decisions?**

Suitable strategic flood risk management plans based on local knowledge should be used to assist with informing decisions. These should include scheme proposals for an area.

**Please outline any potential effects of the local choice, English devolution and opportunities for flood risk management work on groups with a protected characteristic.**

Improved access to funding at a local level would be beneficial for groups with a protected characteristic.

**Overall, how satisfied are you with our online consultation tool?**

- **Very satisfied**
- **Satisfied**
- **Neither satisfied nor dissatisfied**
- **Dissatisfied**
- **Very dissatisfied**
- **Don't know**

Satisfied.

**Please give us any comments you have on the tool, including suggestions on how we could improve it.**

No Response.

