

LOCAL GOVERNMENT ASSOCIATION RESPONSE TO THE PITT REVIEW'S INTERIM CONCLUSIONS AND RECOMMENDATIONS

THEME		PITT REVIEW'S INTERIM CONCLUSION OR RECOMMENDATION	LGA POSITION AND COMMENTS
Strong Government Leadership	Climate Change	<p>(IC 1) Government should take the lead in making the case for the need for adaptation to climate change and particularly in mitigating the potential impacts on communities.</p> <p>(IC 2) Government should develop a clear strategy and action plan to deliver the provisions of the Climate Change Bill to support adaptation to increasing impacts from flooding.</p>	<p>We agree that more leadership is needed from central government to ensure that other major organisations, businesses and communities are required to change their behaviours. Clearly, there is good deal of work to be done at a regional and local level around mitigation and adaptation. The LGA's Climate Change Commission has made specific recommendations for local government, central government and other stakeholders on how the local government response can be improved and is actively encouraging authorities to develop ambitious climate change strategies for their local areas. However, it is vital that Government puts in place a robust statutory and regulatory framework together with robust targets and standards that all should adhere to. Strong and consistent leadership from central government will help to support and encourage leadership at the local level.</p>
Developing Understanding of Flood Risk		<p>(IC 3) The EA should further develop its tools and techniques for modelling river flooding, especially to take account of extreme and multiple events and should take forward work to develop similar tools and techniques to model surface water flooding.</p>	<p>We agree that more could be done in this area, but it would be helpful to understand exactly what is being envisaged in this regard. A number of changes could support this area:</p> <ul style="list-style-type: none"> - ensuring that all sources of flood risk (not just rivers) have tools available to model their behaviour and that there are standardised application systems available to identify, log, map and assess these consistently and share this information between partner organisations; - rainfall gauges are implemented more widely and disparate systems are linked e.g. gauges owned and operated by the EA, Met Office, councils etc) to understand better rainfall in disparate locations; - more widespread telemetry implemented urgently, on major rivers at key points where this is currently lacking and on other watercourses classed as main river; - More sharing of data (LIDAR, telemetry etc) with the EA's partners both proactively for planning and securely on-line during incidents; - More dialogue by the EA with local partners around what constitutes an appropriately sized area.
		<p>(IC 4) The EA should revise its flood maps to identify areas where there is a risk of significant depths and velocity of water to improve the effectiveness of emergency planning.</p>	<p>We agree that better information for these areas is to be welcomed. However, we are also of the view that the EA should provide its partners with more information for all main rivers both in planning documents (above what levels should a river cause us problems) and dynamically during incidents on river depths and velocities to inform our responses (e.g. for those concerned with the structural integrity of bridges). This information would be particularly helpful for local authorities.</p>
		<p>(IC 5) The EA should work more closely with LRFs to provide information drawn from flood risk modelling and mapping tools to improve the accuracy and consistency of flood risk information in Community Risk Registers.</p>	<p>Insofar as this relates to flood risks under its remit we agree, but the EA is not responsible for overall surface water flood risk and would have capacity issues in providing an enhanced service which covered all areas of flood risk. Information provided for emergency planning purposes should be accurate, consistent and useful to all parties. It is essential that any revision of flood risk considers the impact on stakeholders or the public, to avoid unnecessary</p>

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		(IC 6) The EA should progressively develop and bring into use flood visualisation tools designed to meet the needs of flood risk managers, EPOs and responders.	<p>confusion.</p> <p>We agree that access to visualisation tools (for rainfall as well as floods) is an area that could provide tremendous benefits particularly if links could be made between models and known hotspots/critical infrastructure. The EA has a number of systems which might benefit from being opened-up to partners (e.g. local authority drainage staff) able to interpret their data in a meaningful way (telemetry, EnviroMet etc) at little or no cost. It is disappointing to note that the Atlantis Programme highlighted lacks any involvement of the main Cat 1s and 2s.</p> <p>Ideally, we would like to see the development of a standard single or joint GIS application which could be accessed and used by all responding agencies for logging and responding jointly to all flooding locations in a given area. This could also be linked to Incident Management Systems, such as the AIMS system used by many local authorities. For this purpose, there should be a nationally provided GIS application also for the drainage infrastructure, covering both natural open channel and artificial piped or canalised systems. The NFCDD is hopelessly inadequate for this purpose and appears to be scaled only for 'main river' records.</p>
		(REC 1) The Review recommends that more frequent and systematic monitoring of groundwater levels at times of high risk should be undertaken by the EA which should begin as soon as possible to predict and mitigate further serious groundwater flooding from this winter onwards.	This sounds like a good idea, but it is unclear how this would be done and reported, which areas would be chosen and whether the EA has the capacity to cover something so large and which could vary so much dependent on soil, geology or topography. More information around the feasibility of this proposal is required to enable it to be evaluated to see whether it is a cost-effective proposal rather than a great 'research' topic. More effort also needs to be put into preparing national advice to property holders who suffer from cellar flooding due to groundwater (this does not seem to be addressed in the Review).
		(IC 7) The Met Office and the EA produce an early assessment of the costs, benefits and feasibility of techniques which can predict where rain will fall and where surface water flooding will occur.	We need a more sophisticated ability to predict flooding events. There is an opportunity for the two agencies to enhance their systems by having better coverage for their rainfall radar, providing all local authorities with free access to the Met Office's EnviroMet rainfall tracking system via the internet and implementing and linking more rainfall gauges networks, e.g. gauges owned and operated by the EA, MetOffice, councils etc) to understand differential rainfall patterns in disparate locations over more prolonged periods.
		(REC 2) The EA, supported by local authorities and water companies, should urgently identify areas at highest risk from surface water flooding where known, inform LRFs and take steps to identify remaining high risk areas over the coming months.	This sounds more straightforward than it probably is. Many surface water flooding 'hotspots' will already be well-known to relevant services based on historical instances of flooding and mitigation measures can and should be developed where these are known to cause a significant flood risk. However, where extreme rainfall events take place, flooding can occur in areas not known to have experienced this before or where this could not have been predicted. 40 of 81 authorities flooded last summer, who the LGA has surveyed, identified a new need to fund flood resilience schemes in areas flooded for the first time last summer. This can arise for a number of reasons and requires that there are appropriate generic emergency response procedures in place as well as specific plans for known locations. Overall,

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			<p>assessing all of the variables which might collectively give rise to a higher than average flood risk is potentially a mammoth task for which responsible agencies are not resourced nor is there an agreed single model for undertaking this work at the local level, e.g. should there be an individual flood risk management strategy for each neighbourhood or ward: what is the basis for such an approach? Water companies are generally only resourced for responding to existing flooding problems (expressed in the DG5 flooding register) and not strategic flood risk management. Consequently, they do not have reliable models showing potential future flood risk from their assets (e.g. caused by new development or climate change).</p>
Managing Flood Risk	Building and Planning	<p>(IC 8) PPS 25 should be rigorously applied by planning authorities, including giving consideration to all sources of flooding risk and ensuring that developers make a full contribution to the costs both of building and maintaining any necessary defences.</p>	<p>We agree that PPS25 should be rigorously applied by planning authorities in robust, and preferably more formal, partnership with the EA, water companies and possibly other partners. However, this also needs to be reconciled with the fact that many towns and cities are already built in flood plains, that Government is making huge demands on local government around the building of large numbers of homes as part of regional spatial strategies, and that developer contributions are also being sought around the provision of green spaces, transport links and affordable housing. Government needs to establish where the balance lies here rather than passing the problem onto local government where inconsistent conclusions might be drawn.</p>
	Urban Creep	<p>(IC 9) Householders and business owners should no longer be able to lay impermeable surfaces as of right.</p>	<p>This is very welcome and many forms of hard standings should be outlawed if they do not allow water to be absorbed naturally close to where the rainfall has occurred. There has been a growing body of evidence for some years that this has contributed to drainage and flooding problems. While immediate action is required, the LGA recommends that Government undertakes research to provide guidance on alternatives which perhaps address perceived needs without creating run-off problems. DIY retail outlets should be encouraged to disseminate best practice guidance notes in this respect.</p>
	Right to Connect to Drainage Systems	<p>(IC 10) The automatic right to connect to connect surface water drainage of new developments to the sewerage system should be removed.</p>	<p>There are Pros and Cons to be considered in relation to the right to connect. The delivery of the government's housing agenda will depend on the provision of adequate infrastructure - specific funding is available for this in growth areas, but it is not yet clear how this will be resourced in all other areas. The right to connect currently does not encourage developers or other parts of the planning and development system to ensure sustainable drainage options are in place. We need to encourage developers to consider the impact of regeneration and construction and to install and maintain SUDs where possible. We also need to ensure local authorities have the technical resources to support this. Options such as a certificate of completion before connection might encourage higher standards of sustainable construction and drainage. The LGA suggests a review of the right to connect, with the involvement of all stakeholders, including the Planning Officers Society, to identify all the drivers for higher standards and increased capacity in our drainage system.</p>

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	New Buildings	(IC 11) No new building should be allowed in a flood risk area that is not flood-resilient and the Government should work with organisations such as RIBA and the building industry to encourage flood resilient building and development design.	We agree, but would make clear that this will only happen if Government makes this mandatory rather than leaving this to voluntary codes. Given the amount of construction work currently in development and planned, this is a pressing need if we are not to add significantly to existing flood risk levels. Although further research should be undertaken, Government departments and agencies have already undertaken enough work in this area (in the shape of pilots and recommended approaches, as can be found on the EA website) for this to be implemented with some urgency.
		(IC 12) Government should incorporate flood resistance and resilience requirements for new properties in flood risk areas into Building Regulations as part of the current process of revision.	We agree and would reiterate the comments in IC11 above.
	Existing Buildings	(IC 13) Government should incorporate requirements for resistant or resilient refurbishment of flooded properties in high flood-risk areas into Building Regulations as part of the current process of revision.	We agree and would reiterate the comments in IC11 above. The current system of reinstating materials and fixtures and fittings that are inappropriate in a flood risk area is completely at odds with the principles of sustainable development and waste reduction.
		(IC 14) Local authorities and housing associations should take a more active role in increasing the uptake of flood resistance and resilience measures, leading by example by repairing their properties with appropriate materials where it is cost-effective.	<p>We agree, but this could provide the pretext for Government to pass the buck to others and for inconsistency across the country. In our view, Government should develop a national framework and set of standards which can be provided to the EA, local government, housing associations and others for implementation. This would naturally require additional funding as we are not resourced for this.</p> <p>We are also surprised that this IC relates only to domestic properties owned by local authorities and housing associations: why should not insurance companies (ideally placed for this) require all private properties previously flooded to do this? This should logically also apply to business premises and Government offices .</p>
		(IC 15) Local authority properties in high flood-risk areas should extend eligibility for home improvement grants and loans to encompass flood resistance and resilience products.	This sounds like a good idea, but would be an additional burden for which local authorities are not currently resourced. There needs to be some research around the likely take-up and appropriate provision made to prevent this meeting the same fate as recent grants schemes for installing eco-friendly home electricity generation.
		(IC 16) As they discharge their duties under the Civil Contingencies Act to promote business continuity, local authorities should encourage the uptake of property-level flood resistance and resilience measures. This should be reflected in guidance from government.	<p>The encouragement to take-up flood resistance and resilience measures is good in principle, but placing this burden solely upon local authorities is misguided (albeit well-intended) as their capacity and resources are not infinitely elastic . The development of awareness and incentives would be a useful area of work for the insurance industry to be involved in.</p> <p>IWe recommend that Government develops a national framework and set of standards which can be provided to local responders for delivery. However, we believe this is a burden which should be shared between local authorities and the EA (which has all the contacts with companies providing these resources), indeed there could be economies of scale if the Government/EA organised a national campaign with roadshow events as the EA has done previously for flood warnings and resilience. There are also likely to be some additional costs associated with this.</p>
Surface Water	Stronger	(IC 17) Local authorities should lead on the management of	In principle, the concept of a local authority leading or co-

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<p>Flooding and Drainage</p>	<p>Leadership</p>	<p>surface water flooding and drainage at the local level with the support of all responsible organisations, including the EA, water companies, and IDBs, the Highways Agency and British Waterways.</p>	<p>ordinating a statutory-based partnership of stakeholders, each with a role in ensuring that there is an effective, proportionate and funded strategy towards the management of flood risk at the 'local level', is something that the LGA would welcome in principle. However, achieving this is easier said than done and there are a number of issues and prerequisites that would need to be in place to prevent such an approach from unravelling.</p> <p>Firstly, there would need to be an effective new statutory foundation for the management of flood risk (not just flooding) and drainage which covers all stakeholders with a role in this and which places clearly articulated duties to play their part - not voluntary participation or co-operation - with penalties for non-conformity. This should apply to the EA, local government (tier to be agreed, but district-based is probably more appropriate), water companies, IDBs, Highways Agency and British Waterways. It should also place clear statutory maintenance duties on riparian owners who only have common law obligations at present and should also encompass reservoir undertakers and their roles.</p> <p>Secondly, there should be a clear articulation of what it is we would like these partnerships to achieve. In our view, the key outcome needs to be the development of a local authority district-based ten to twenty-five year (?) Surface Water Management Plan in which partners agree issues and priorities around the existing infrastructure, an action plan setting-out how the infrastructure should evolve and over what timeframe, and how these actions are to be co-ordinated and funded. On the latter point, it is essential that the strategy is underpinned by a joint investment plan and that existing regimes, such as the water companies' investment plans reviewed by OFWAT, take due account of these. As far as we are aware, a model for the SWMPs has yet to be properly articulated and a national template should be developed to facilitate this. This should be subject to further consultation and should be informed by the lessons of the process undertaken within Glasgow.</p> <p>Thirdly, there needs to be a clear understanding of what duties should be placed upon partners to ensure appropriate behaviours in pursuit of the desired outcomes and the CCA approach may help in this regard. In our view, there should be duties on all players to co-operate towards identified shared aims, to share information subject to appropriate safeguards, to assess the risk of flooding in specific locations, to prepare joint strategic and operational plans, to work together for the resolution of identified problems, to communicate our strategies and plans to the public, and to promote flood resilience to the public and businesses. There also needs to be an identified arbiter to ensure that partners fulfil these obligations.</p> <p>Fourthly, there should be some clear standards and guidance on the forums required to facilitate the joint working. The LGA recommends the model developed in Leeds for district-</p>

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			<p>based forums comprised of representatives of the council, EA, water company and British Waterways which encompasses: (i) a strategic flood risk management board at senior management level to agree and oversee the strategy; (ii) a technical-operational forum to address known problems and investigate incidents; (iii) a combined group of planners and drainage experts to review drainage implications of major new developments.</p> <p>Lastly, we should identify and learn from European case study examples, particularly on the way national and local government, land owners, environmental agencies etc can work together to reduce both local and national flood risk. As part of research into models of good practice, we should consider a range of options for financing flood risk management and look at pooling resources, skills and joint schemes to achieve the most efficient and effective solutions.</p>
		(IC 18) Local authorities in flood risk areas should assess their capabilities to deliver a wide range of responsibilities in relation to flood risk management.	<p>Once again this is a good idea in principle and a certain amount of preparatory work could be undertaken with limited effort. However, we would argue that Government should first agree the content of the framework which should be implemented, the roles which they would foresee each of the key players undertaking and how these are to be funded, then local government will have an appropriate baseline against which it can benchmark its capabilities. Without a clear understanding of what is likely to be required, this is probably somewhat premature. We would recommend that this IC should not be solely targeted at local authorities, when other stakeholders will have an enhanced role to play and in some cases lack adequate provision to discharge their current and likely future responsibilities. This IC should also apply to all local authorities, given that last summer's floods demonstrated that flooding should be now be considered a risk for all areas.</p>
		(IC 19) The EA should have a national overview of all flood risk and DEFRA's work on the development of a national overview role for the EA in relation to surface water flooding should be progressed.	<p>In principle, it is a good idea to have a single agency exercising a national overview and this is in a sense an extension of the logic of the Water Resources Act, 1991 (s.105) which states that the EA "<i>shall ... exercise a general supervision over all matters relating to flood defence</i>". However, there are a number of caveats which should be highlighted that impinge upon this.</p> <p>Firstly, there should be further clarification around the mutual responsibilities of the EA and DEFRA to ensure that they do not duplicate effort and that there are no grounds for confusion. Consideration could be given to transferring more of DEFRA's Flood Management responsibilities to the EA.</p> <p>Secondly, the LGA would question whether the EA is sufficiently resourced for the functions it is currently responsible for. This proposal would require a step-change in its existing capabilities to ensure that it is able to pick-up these burdens effectively. It will also need to have robust powers to ensure that local partnerships work and that all agencies play their part.</p>

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			<p>Thirdly, there needs to be clear articulation of where the balance lies between providing a national overview and national tools and resources and local determination. The EA may find itself with potential conflicts of interest as the overall enforcer and a stakeholder in individual local partnerships.</p>
<p>Better Co-ordination and Information</p>		<p>(IC 20) Local Surface Water Management Plans (as set-out under PPS25) should provide the basis for managing surface water flood risk. These plans should be co-ordinated by the local authority and be risk-based, considering all sources of flooding.</p> <p>Para. 4.33 states that “Each SWMP should be accompanied by an action plan setting out all of the actions to be taken by all those engaged in flood risk management and with responsibilities in this area, which may often include the EA in its local capacity. These action plans should be developed in partnership with the relevant organisations and led by the local authority”.</p> <p>Para. 4.34: “Water companies will have a crucial role in the development of ... action plans”.</p> <p>Para. 4.35: “The resulting actions should be risk-based and form part of a coherent strategy for managing the local risk of flooding”.</p>	<p>We agree, but please see our response to IC 17.</p> <p>SWMPs should support more strategic planning at local, regional and national level. By building on data from all partners, they should improve flood risk management, address known and future shortcomings in the drainage infrastructure, inform Community Risk Registers to aid EPOs in identifying high-risk areas, inform land-use planning for new and existing developments (e.g. options for flood storage areas, SUDs) and provide framework for prioritising resources regarding new assets and maintenance. This covers a lot of ground and we need to be sure that SWMPs are sufficiently broad to allow for a comprehensive plan for the maintenance and evolution of the drainage infrastructure. Further discussions around this should ensure that there are clear views on how the SWMPs might relate to Community Risk Registers required by the Civil Contingencies Act and the Strategic Flood Risk Assessment required under PPS25.</p>
		<p>(IC 21) A local register of all the main flood risk management and drainage assets (overland and underground) should be compiled by the relevant local authority, including an assessment of their condition and details of responsible owners.</p> <p>Para. 4.34: “Water companies will have a crucial role in the development of effective registers ..., providing information relating to the location and condition of their drainage infrastructure. They should also be able to provide basic modelling of the flows of water through their networks and what would happen if these were exceeded. Other organisations, such as the Highways Agency and British Waterways, will also need to provide similar information on their assets”.</p>	<p>We need local authorities to have a better understanding of local water assets. This will help them to make the case for investment in maintenance and renewal. It will also help identify underfunding and inform submissions to the next spending review to address current underfunding and future spending requirements.</p> <p>We would also suggest that all watercourses and ponds of a significant size in a district should be identified by the local authority and information maintained on the ownership of these for enforcement purposes. Solicitors should also be required to draw attention to these ‘assets’ as part of the conveyancing process so that owners understand the nature of the burden they are taking on.”</p> <p>This proposal appears to go far beyond council-owned and maintained culverts, drains and gullies to encompass the location and condition of all flood defences and drainage assets belonging to a range of corporate and private bodies and individuals.</p> <p>Whilst it is possibly a good idea in principle to have a single repository maintained by a single body, there are a number of important caveats:</p> <ul style="list-style-type: none"> - firstly, it is questionable whether much of the information desired is actually available. What information should be gathered, by whom, within what timeframe and how will this exercise be funded ? - secondly, given the scope for reinventing the wheel or inconsistency in standards of data-gathering and assessment, should it not be recommended that there should

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			<p>be a standard methodology and application system in which to log and assess these assets and infrastructures ?</p> <ul style="list-style-type: none"> - thirdly, this is dependent upon the statutory framework obliging responsible bodies to share information (as suggested in our response to IC17) ? - fourthly, are any statutory obligations going to be placed on developers and highways authorities to ensure that accurate as-built records are prepared for all new developments and added to the body of knowledge ? <p>Whilst this recommendation is crucial in understanding the condition of all our assets and providing the basis for an action plan to support SWMPs and flood risk management planning , it will involve a huge investment of resources and could take several years to complete. A strategy to provide a timetable of actions, co-operation and funding will be essential if this very sensible recommendation is to be fulfilled.</p>
		(IC 22) DEFRA should issue guidance on how all organisations can be brought together to work with local authorities on surface water flood risk management, sharing information, modelling and expertise on a consistent basis.	We agree. Please see earlier responses above, especially to IC17.
	Tools for Surface Water Flood Risk Management - Slower Water and Better Drainage	(IC 23) Government, as part of its water strategy, should resolve the issue of which organisations should be responsible for the ownership and maintenance of SUDs.	We agree . It is crucial that we resolve the current situation regarding SUDs, whereby there is an on-going risk that developers build these but then do not wish to maintain them and water companies do not want to adopt them. Local authorities are then looked to in order to intervene and pick-up the responsibility, even though these costs would have been avoided if conventional gully and piped drainage had been installed. It is recommended that government takes a fresh look at the effectiveness of, and responsibility for, SUDS and how these should be better regulated or taken account of.
		(IC 24) DEFRA should work with OFWAT and the water industry to explore how appropriate risk-based standards for drainage systems (including pumping stations) can be achieved.	<p>We agree that revised standards need to be developed, although we would argue that representatives of other key stakeholders (especially local authority land drainage engineers) with a vested interest should be allowed to participate in this process to prevent it from being too self-serving or voluntary-based. It is worrying that, although IC17 foresees that "local authorities should lead on the management of surface water flooding and drainage at the local level", they are not deemed as a key component in devising these new standards.</p> <p>Water companies and developers building prospectively adoptable sewers commonly design sewers to accommodate flows arising from the worst case 1 in 30 year rainfall without flooding, in accordance with the guidance issued by Water UK. When flood alleviation schemes are being designed by flood defence operating authorities (e.g. the EA and local authorities) to control flooding from watercourses, a much higher standard is used, e.g. a 1 in 100 year flood, or worse, including an uplift for climate change. This discrepancy between the standards used for sewers and watercourses does not seem reasonable. This becomes even more the case when it is considered that some 'watercourse' culverts (for historical reasons, relating to the powers used</p>

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		(IC 25) As part of the forthcoming 2009 water industry pricing review, the water companies - in conjunction with local authorities and other partners - should develop proposals for investment in the existing drainage network to deal with increasing flood risk.	<p>to build them) are classed as public surface water sewers.</p> <p>In our comments regarding IC17 above, we stated that the development of local authority district-based Surface Water Management Plans need to be underpinned by a joint investment plan and that existing regimes, such as the water companies' investment plans reviewed by OFWAT, take due account of these.</p> <p>In that sense we agree that there needs to be a mechanism for determining the medium- to long-term investment needs of the drainage infrastructure and flood risk management. However, this requires there to be a new framework in place which describes what is needed, how this can be undertaken, and who should be doing what so we do not 'get the cart before the horse' ? In the absence of this framework, is the water industry pricing review the most appropriate vehicle given that it addresses only part of the debate ? Perhaps the terms of reference for this review should be amended so that its impact is more provisional pending the outcome and reception of the Pitt Review's final recommendations ?</p>
	Effective Scrutiny	(IC 26) Local authority scrutiny committees should review SWMPs and other linked plans, such as Local Development Frameworks and Community Risk Registers, to ensure that flood risk is adequately considered and to ensure greater transparency and progress in the management of that risk.	<p>This conclusion provides an opportunity for flood risk management to become part of the mainstream of local governance, but we would suggest that it would require careful development and implementation to ensure that this proved ultimately fruitful.</p> <p>Several issues should be taken into account in developing this idea:</p> <ul style="list-style-type: none"> - firstly, the drainage infrastructure is very complicated from a technical and historical perspective and it would be advisable if some form of readily comprehensible guidance were produced by Government to enable members to grasp the complexities and subtleties of this and what the key issues to focus on are; - secondly, what would the relationship of any scrutiny committee be to other committees which focus on LDFs or specific planning issues as well as wider emergency planning ? - thirdly, what accountability would there be to the committee from other stakeholders in Flood Risk/SWMP partnership, such as water companies and the EA <p>Scrutiny committees need to incorporate these issues if they are to have any 'teeth'.</p>
	Flood Defence	(IC 27) The EA and other local organisations should continue to focus investment on areas of highest assessed long-term risk, whether or not they have recently been flooded.	<p>We agree that this should always happen where there are finite resources, but it does not remove the question of whether the allocation made available to the EA by Government is adequate. Is this a question that the Pitt Review should be asking directly ? It is also vital that there is transparency in decision-making and any decision not to invest in a particular area is explained and justified to those affected. This then gives rise to the question of what is to be done to help those repeatedly flooded when the assessed level of risk is not sufficient to qualify for funding and local funding means are lacking ?</p> <p>Please note that, as we remarked upon under REC 2, water</p>

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			companies are generally only resourced for responding to existing flooding problems (expressed in the DG5 flooding register) and not strategic flood risk management.
		(IC 28) The Government should commit to a strategic long-term approach to its investment in flood risk management, planning up to 25 years ahead and this should encourage local partners to think longer-term.	We agree and this echoes our thoughts around SWMP in our response to IC17 above. The longer-term our approach, the more solid our planning assumptions and investment strategies are likely to be.
	Maintenance of Defences and Watercourses	(IC 29) The EA should open dialogue with all those landowners who will be affected by either a withdrawal from or significant reduction in maintenance of rural watercourses.	We would suggest that the responsibilities and needs of farmers around surface water run-off should be picked-up in the new statutory framework. Better targeting of Defra environmental subsidies could increase the incentives for farmers and other land owners to reduce practices that increase flood risk (such as cropping patterns) and encourage proactive measures to address problems - clearing culverts etc. The Review of the Common Agricultural Policy could be an opportunity to look at incentives to help reduce flood risk
	Temporary and Demountable Structures	(REC 3) The Review recommends that the EA should urgently develop and implement a clear policy on the use of temporary and demountable defences.	We agree with this. Authorities need to understand what part temporary defences could play in their flood risk management strategies.
	The Role of Sandbags	(IC 30) Government should develop a single national set of guidance for local authorities and the public on the use and usefulness of sandbags and other alternatives rather than leaving the matter wholly to local discretion.	We agree. Sandbags can be seen by the public and the media as a panacea in flooding events and their existence and deployment constitutes one of the most fraught parts of the emergency response to flooding.
	Working with Natural Processes	(IC 31) DEFRA, the EA and Natural England should work with partners to establish a programme and framework to achieve greater working with natural processes, including the identification of appropriate sites and the development of more incentives for creating water storage, restoring the natural course of rivers and establishing green corridors.	We agree. It is essential that flood risk management gives greater consideration to the development, protection and role of green spaces and wetlands. In addition, the role of land management and land owners and the on-going place-shaping agenda should all be considered in developing this framework.
	Modernising Responsibilities for Flood Risk Management	(IC 33) Flooding legislation should be updated and streamlined under a single unifying Act that among other outcomes addresses all sources of flooding, clarifies responsibilities and facilitates flood risk management.	We agree with this and would refer back to our comments against IC17 for our specific concerns around this. The LGA is keen to work with government and key stakeholders in updating legislation on flooding and clarifying responsibilities. It is of particular concern to many of our member authorities that there is currently a lack of responsibility for surface water run-off.
	Insurance	(IC 34) Government and the insurance industry should work together to deliver a public education programme setting out the benefits of insurance in the context of flooding.	We agree that this is long overdue and would suggest further that - in light of the approach taken for motoring - there might be (i) merits in considering whether this could be made compulsory for both buildings and contents or (ii) mortgage providers could be required to see documentary evidence that buildings and contents insurance is in place. It might be argued that this should be left as a matter of choice, but the failure to act has financial and other resource implications for the responding agencies who could reasonably argue that there is space for a high-degree of self-help here.
		(IC 35) Government and the insurance industry should work together to develop options to improve the availability and uptake of flood risk insurance by low-income households and assess the costs, benefits and feasibility of these options before the Review's final report.	We agree (see IC35 above).
		(IC 36) In flood risk areas a note on flood risk and the simple steps that could be taken to mitigate it should be included with all insurance renewal notices. Moreover, if Flood Warning	We agree. We would recommend that the Insurance industry works with government and partners to consider a system of incentives to help reduce local flood risk and damage. We

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		Direct is available in a customer's area, one of the conditions of renewal could be to sign-up to this service.	also recommend discussion within the industry about standardising the level of service received after flooding and to review the performance of loss adjusters and contractors in the light of policy holders experience last summer. There is much that can be done to help householders mitigate the risk of flooding and ensure property is better adapted to withstand extreme weather - we recommend that guidance is developed as a priority.
The Emergency Response	Met Office Forecasts	(IC 37) The Met Office and the EA should produce an assessment of the options for issuing warnings against a lower threshold of probability, including costs, benefits and feasibility for further consideration in the final report.	We agree that there needs to be further dialogue between the EA, Met Office and other stakeholders on the thresholds for issuing warnings as the rationale for these decisions is often lost on local government partners. This also links to the identification of flood warning zones by the EA which sometimes makes little sense to local authority EPOs and the public.
	The Local Response	(IC 38) Unless agreed otherwise locally, 'upper tier' local authorities should be the lead organisation in relation to multi-agency planning for severe weather emergencies at the local level and for triggering multi-agency arrangements in response to severe weather warnings. Para. 5.17: "The Police, unless agreed otherwise locally, should then convene and lead the multi-agency response".	We agree, but would defer to local determination on this subject to very clear agreement and arrangements.
		(IC 39) Where a Gold command is established, the Police, unless agreed otherwise locally, should convene and lead the multi-agency response.	We agree that this conforms to best practice.
		(IC 40) Gold commands should be established at an early stage on a precautionary basis where there is a risk of serious flooding.	Where the risk of a serious flooding event can be predicted across a wider area, this could be deemed a sensible precaution. However, this links intimately with IC 38 above and there needs to be further consideration as to who should be the primary agent in this.
		(IC 41) LRFs should assess the effectiveness of their Gold facilities, including flexible accommodation, IT and communications systems.	We would suggest that there should be a one-off exercise by central government in which it sets down minimum standards for Gold and Silver commands which is followed by a detailed audit and inspection Authorities report that Gold Command is well-developed and resourced, but Silver Commands by comparison can be too small and poorly-equipped to perform as effective multi-agency set-ups. This issue needs to be addressed.
		(REC 4) All LRFs should urgently review their current local arrangements for water rescue to consider whether they are adequate in light of the summer's events and their local community risk registers.	We agree and as with other recommendations for LRFs, will be undertaking research and analysis of the future plans (of all LRFs, not just those affected in summer 2007) to review and revise their arrangements in the light of lessons learned from the flooding last summer.
		(IC 42) The LGA should consider how best mutual support might be enhanced between local authorities in the vent of a future wide-area emergency.	The LGA is currently consulting with our advisers on identifying the various options and good practice for mutual support and is keen to work closely with the Pitt Review Team government and partners to develop this piece of work. We hope to develop a set of recommendations on effective arrangements and help to ensure these are widely adopted.
		(REC 5) All LRFs should undertake an urgent review of designated rest centres and other major facilities to ensure either that they have the necessary levels of resilience to enable them to be used in the response to flooding and other major emergencies, or that alternative arrangements are put in	We agree and reiterate our comments on Rec 4 above.

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	place.	
	(IC 43) CCS guidance to local EPOs should specifically include incidents which leave large numbers of people stranded on motorways and trunk roads.	We understood that this issue was addressed some time ago and that this responsibility formed part of the Highways Agency's responsibilities.
	(IC 44) As part of their emergency plans, LRFs should consider the vulnerability of motorways and trunk roads to flooding and consider the potential for earlier, stronger, more specific warnings and strategic road clearance and closures to avoid people becoming stranded.	The vulnerability of key roads is taken account of in local authorities' existing flood plans. All multi-agency flood plans should include diversion schemes to address the likely impact. In relation to the specific types of roads mentioned, we would suggest that the planning and response burden falls primarily to the Highways Agency which should be tasked with approaching the LRFs to advise what its arrangements are.
	(REC 6) The Cabinet Office, with other departments, should urgently consider the costs, benefits and feasibility of establishing arrangements for the urgent acquisition of supplies during a major emergency, including the use of call-off contracts or the creation of national or regional stockpiles of equipment and consumables.	We agree and would advise that the Council's Head of Risk and Emergency Planning is formally consulted by the CCS lead on what should be in place for both flooding and other emergencies. A national framework should address key considerations including: <ul style="list-style-type: none"> - what resources are needed for each of the specific periods of incident response and recovery (e.g. immediate: first 24 hours; short-term of 1-7 days; then medium-term of 7 days to 3 months; long-term of 3 months plus). - Which resources need to be held physically and which could be virtual, drawn down from call-off contracts or from supermarkets ? - Where should resources be stored (locally, regionally, nationally) ? - What are optimal or minimum stock levels ? - What are the storage, maintenance and security considerations ? - How should these resources be deployed and within what acceptable timeframes
	(IC 45) DEFRA should review the current requirement in emergency regulations for the minimum amount of water to be provided in an emergency to reflect reasonable needs during a long-term loss of supply.	We agree and there should be urgent discussions with the water industry to ensure that bottled or similar water is always provided when requested on a 'provide now, discuss the cost implications later' basis. The key requirement should always be for clean water to be provided immediately for those who need it.
	(REC 7) The Department of Health guidance clarifying the role and accountabilities of organisations involved in providing scientific and technical advice during a major incident should be implemented as soon as possible and understood by Gold Commanders.	We agree and this should apply equally to all incidents with health implications.
	(REC 8) The guidance currently under preparation by Cabinet Office should provide local responders with advice on the definition and identification of vulnerable people and on planning to support them in an emergency should be issued urgently.	We agree with this in principle. However, we are concerned that this and other guidance/strategies (e.g. DEFRA's current consultation documents) are in danger of being rushed through by Government departments in response to the Pitt Review's ICs and recommendations. <p>The Review has identified a number of gaps and deficiencies which have in reality been present for some years. We would prefer the implementation of recommendations to be methodical and take the time needed to get it right. For example, the recent CCS guidance around vulnerable people was extremely poor in even its later drafting and required some quite blunt intervention from the LGA perspective to ensure serious problems were addressed. There is a danger that stakeholders will not have enough time to compose a useful response to</p>

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	The National and Regional Response	(IC 46) Central government crisis machinery should always be activated if significant wide-area flooding of whatever nature is expected or occurs.	fundamental issues. We would broadly agree, so long as COBR's operation does not burden local responses unduly with unnecessary requests for information for ministerial briefings via the regional resilience tier. Further consideration should be given as to what information could and should be reasonably demanded by COBR, bearing in mind that local responders primary and statutory duties relate to their local response. This area might be aided by the development and roll-out of some ICT capability that enables local responders to input data directly when convenient to them (e.g. via the much-vaunted Regional Extranet ?) It would be helpful if local responders could have sight of central government's Common Recognised Information Picture (CRIP) SITREP template to inform our processes.
		(IC 47) DEFRA extends its current departmental programme to share best practice and provide training in emergency response across the organisation.	The LGA's advisers have suggested that it would be more helpful if the responsibilities of the CCS were developed so that it becomes the repository of training and exercising expertise within central government.
		(REC 9) In order to effectively fulfil its Lead Department role for flood risk management and emergency response, DEFRA needs to urgently develop and share a national flood emergency framework.	We agree that there may be merits in developing (methodically rather than hurriedly) a national flood emergency framework, although the utility of this will depend very much on what this is intended to encompass.
		(IC 48) DEFRA and the EA should work together to establish a single London situation room to co-ordinate flooding information, act as a focal point for cross-DEFRA efforts and support DEFRA ministers.	As noted under IC19, we believe that there should be further clarification around the mutual responsibilities of the EA and DEFRA to ensure that they do not duplicate effort and that there are no grounds for confusion.
		(IC 49) A national flooding exercise should take place at the earliest opportunity in order to test the new arrangements which central government departments are putting into place to deal with flooding and infrastructure emergencies.	We agree that a national exercise should take place once the new arrangements have been developed and agreed and that DEFRA should host these at least every 3 years.
		(IC 50) Financial assistance for local responders in relation to emergency response and recovery should be revised to improve speed, simplicity and certainty.	We agree. The recent experience was far more responsive and dynamic than on previous occasions. Consideration should be given as to whether organisations like the community foundations can be tasked on a national basis for making disbursements to affected householders following flooding and other incidents and similar organisations to undertake this for businesses.
	Transition to Recovery	(IC 51) LRFs should be made aware of recent CCS guidance setting-out the transition to recovery. Recovery sub-groups should be established from the onset of major emergencies and in due course there should be a formal handover to the local Recovery Co-ordinating Group(s), normally chaired by the Chief Executive of the affected local authority.	We agree and hope that this is in place in most areas.
Critical Infrastructure: Keeping our Essential Services Going	Protecting Our Infrastructure	(IC 52) Government should establish a systematic, co-ordinated, cross-sector campaign to reduce disruption caused by natural events to critical infrastructure and essential services.	We agree in part, although this probably does not go far enough. We are disappointed that it took the recent floods to highlight Government's failure to take forward the CNI work following the 2000 floods and Y2K. In our view, it also highlights that the fact that the light-touch duties placed upon the utilities under the Civil Contingencies Act as Cat.2 rather than Cat. 1 responders have provided a pretext for them to fail to assess the risks to their assets adequately, to plan for their losses and the resultant impact, and indeed not to share information on the consequences with other statutory partners. The utilities should be given further duties under the impending review of the CCA to ensure that they act-up to their responsibilities to communities and

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			other responders in terms of risk assessment, emergency planning, warning and informing the public as well as having business continuity plans.
		(IC 53) Government should develop and issue guidance on consistent and proportionate minimum levels of protection from flooding for critical infrastructure.	We agree, subject to comments made at IC52 above.
		(IC 54) Infrastructure-operating companies should present the case for further investment in flood resilience through the appropriate regulatory process.	We agree, subject to comments made at IC52 above.
		(IC 55) A duty should be introduced on critical infrastructure operators to have business continuity planning to BS25999 in place to more closely reflect the duty on Category 1 responders. This should include minimising the loss of service as far as practicable in the event of a serious emergency from flooding.	We agree, subject to comments made at IC52 above.
		(REC 10) Category 1 responders should be urgently provided with a detailed assessment of critical infrastructure in their areas to enable them to assess its vulnerability to flooding.	We agree this would be useful, but it would be helpful to establish who is going to provide and collate this.
		(IC 56) In relation to information-sharing and co-operation, the CCA and regulations should be extended to require Category 2 responders to more formally contribute information on critical sites, their vulnerability and the impact of their loss.	<p>As noted under IC52 above, this to be welcomed but does not go far enough. It is essential that utilities routinely share information with local partners to enable more effective emergency planning and co-operation.</p> <p>We believe that the current duties placed on the utilities have allowed them to avoid contributing to the development of emergency repose arrangements to an appropriate extent. Their responsibilities should be completely reviewed under the forthcoming CCA review by the CCS, which we hope will place further statutory responsibilities upon them in terms of both planning and response (e.g. attendance at Gold or Silver control centres in flooding incidents, sharing information on properties reported as flooded, allowing local authorities to access maps of their infrastructure etc). We need clear responsibilities for all responders to co-operate, with sanctions if this does not happen.</p>
		(IC 57) Single points of failure and the complete loss of assets need to be explicitly considered in the risk assessment and contingency planning undertaken by operators, emergency planners and responders.	We agree that this is desirable, but in our view can only arise if the responders concerned have adequate statutory obligations placed upon them in the first instance (see IC52 and IC56 above).
		(IC 58) LRFs should ensure that Community Risk Registers reflect risks to critical infrastructure from flooding and other hazards.	We agree that CRRs should reflect these risks, but in many areas there may be so many of these that they could swamp the register such that they can only be given a generic mention. Surely this is as much an issue for regional and national risk registers too ?
		(IC 59) Category 2 responders should be required to participate fully at Gold and Silver commands and that the government should deliver this through the Civil Contingencies Act or other regulatory regimes.	Once again this relates to the failure to apply appropriate burdens under the CCA to the utilities as noted under IC52 and IC56 above. Their responsibilities should be completely reviewed under the forthcoming CCA review by the CCS, which we hope will place further statutory responsibilities upon them in terms of both planning and response
		(IC 60) Emergency plans and BCPs of essential service providers should be reviewed annually by local authority scrutiny committees.	We consider that this IC is well-intended, but probably misguided for the following reasons. Firstly, the existing generic and specific emergency plans of the local authority and its partners are not subjected to such reviews: why should these plans be any different ? Secondly, the skills required to write such plans do not develop overnight: how

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			could we provide members with sufficient competence and capacity to be able to critique these so that there were tangible benefits to be gained? Thirdly, who is encompassed under the rubric of essential service providers?
		(IC 61) Critical infrastructure planning should become a separate discipline within civil protection at the local level.	We disagree with this. The need to plan for disruptions should be deemed an integral component of all civil protection, so we do not agree that it should become a separate discipline. The same CCA duties surely relate to these services as they do to others?
		(IC 62) The Government should implement legislative changes proposed in the recently-published EA biennial report on dam and reservoir safety.	<p>We agree that a number of key changes are required to ensure that the statutory framework for ensuring dam and reservoir safety is fit-for-purpose. This includes:</p> <ul style="list-style-type: none"> - a more risk-based approach rather than the existing volumetric thresholds which captures a greater number of structures than at present; - encompassing other bodies of water like quarry lagoons which constitute <i>de facto</i> reservoirs, but which are regulated under the Mines and Quarries Act; - making sure off-site plans and inundation maps are required where there are downstream communities at-risk for which the operators or owners can be charged for preparing; - highlighting how the significant number of bodies of water belonging to organisations with inadequate resources can be addressed; - providing 'good practice' guidance for the use of undertakers/owners which preferably has statutory force. <p>We are happy with the progress being made by DEFRA's Project Board for Reservoir Flood Planning.</p>
		(IC 63) All reservoir undertakers should be required by DEFRA to prepare inundation maps and share them with LRFs to improve Community Risk Registers and emergency planning.	Member authorities have raised their concerns specifically on the issue of their inability to access this information. We agree that, where the level of identified risk calls for this, then inundation maps should be prepared and shared with appropriate partners. The optimal way for this process to be successful could be - as is currently being contemplated - for a one-off national exercise to be commissioned by DEFRA/EA for the mapping of all structures with a given risk profile. However, authorities are concerned that they need access to this information now in order to inform their local flood risk assessments and emergency plans.
Engaging Public	The Raising Awareness Before The Emergency	(IC 64) The EA should produce a sliding scale of options for greater personalisation of public warning information, including costs, benefits and feasibility before the Review's final report.	<p>We agree that it would be worthwhile for the EA to investigate options for trying to 'get the message across' to the public. However, we are firmly of the view that the shortcomings identified in the Review are part of a much wider picture of Government being reluctant to address the whole issue of how the public are communicated with in relation to emergencies, both proactively and reactively, in an open and meaningful way.</p> <p>The warning and informing the public duty has not been a successful aspect of the CCA guidance and implementation. We need to make better use of information technology to communicate between agencies and to the public in flooding events. We need a clear vision of what we want to achieve and how this should be done nationally. There are lessons to be learned from public education and warning systems in other</p>

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			<p>countries.</p> <p>The lack of a dedicated emergency management agency prepared to advocate and support more effective warning and informing is telling.</p>
	Weather and Flood Warnings	(REC 11) The EA should work urgently with telecommunications companies, consulting the Information Commissioner as necessary to facilitate the roll-out of 'opt-out' telephone flood warning schemes to all homes and businesses liable to flooding, including homes with ex-directory numbers.	<p>We agree with this whole-heartedly and this is consistent with our original submission. This is a simple change with potentially major benefits.</p> <p>The LGA is very keen to work with the Review Team and government and support research to analyse mechanisms and arrangements for improving our systems for warning and informing the public. We believe there is a great deal of potential with communications technology to improve the way EA and LRFs issue effective warnings and build on door knocking etc.</p>
		(REC 12) LRFs should urgently develop plans to enhance flood warnings through 'door-knocking' by local authorities based on an assessment of the post code areas likely to flood.	<p>Member authorities have differing views about this recommendation, which is well-intentioned but in many areas would be impractical. In many areas, this is a role which has been traditionally assigned to the Police and EA loud-hailer vehicles and they would seek to prioritise officers for this purpose. However, local authorities are not emergency responders in the same fashion (with significant numbers of officers operating outside normal office hours) and do not have the levels or types of staff (at least in any meaningful numbers) who could do this in an effective way. During office hours, it would be a significant challenge to get staff to do this when these are spread out over a large area, but outside of hours this would be all but impossible in a reasonable timeframe. Moreover, during flood responses local authorities already find themselves overstretched performing a plethora of various roles.</p> <p>We would suggest that the Review reconsiders what purpose needs to be fulfilled and whether there are other media through which this might be achieved.</p> <p>LRFs will be able to determine the most effective way to enhance flood warnings in their local area - in certain areas and situations door knocking will be very effective. A review of practice and feasibility, together with a detailed exploration of other options would be most helpful before this recommendation was adopted in all areas.</p>
		(IC 65) The EA should work with local responders to raise awareness in flood risk areas and identify a range of mechanisms to warn the public, particularly the vulnerable, in response to flooding.	<p>We agree with this in principle, but would stress the need for caution in recognition of the sheer scale of work this will give rise to. It is vital that we raise the awareness and capacity of the public to take account of flood risk and be prepared for emergencies. However, the EA is not currently resourced to do this, neither are local authorities. We would suggest that this should also be considered in light of our comments under IC64. We would further suggest that work in this area could be informed by the LGA's proposed 'reference group of authorities to test out some of the recommendations and conclusions and identify solutions and good practice.</p>
	Providing Advice	(IC 66) Advice by telephone should come from just two sources -	Although we do not fundamentally disagree with the proposal,

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	In An Emergency	the EA for flooding information and local authority contacts centres for local advice.	<p>this IC is in danger of proceeding on the basis of symptoms rather than causes as noted under IC64. Unless there is a clear national strategy on how information should be provided to the public in emergencies across the board, rather than the current piecemeal approach based on addressing the consequences of particular hazards, it is hard to see why it would be wrong to argue that information in flood emergencies should only come from one single telephone source which logically makes more sense.</p> <p>IC66 also makes no mention of how the public would become aware that there would be two numbers, how they should distinguish between them and what would they do if they had concerns that spanned the remits of both ? Does this proposal not let the water companies off the hook?</p> <p>Finally, we are aware that the EA had launched a pilot project for a single flood helpline to handle calls for flooding related to the EA's and local authorities' responsibilities the LGA is keen to work with the EA on this initiative.</p>
		(IC 67) Advice disseminated via the internet should be coherent by ensuring integration and consistency between local websites, including that of the LRF and those of Category 1 responders.	We agree that there should be more consistency in the provision of advice to the public, but this links back again to our generic criticisms located at IC64. There should be a national view taken on what would be the best platform for providing the public with information on what they should do if an incident were to arise and what is happening in an actual incident: for example, should there be joint LRF websites for this purpose or should we expect the public to use the Council website etc ? Once the level has been agreed, then there can be an appropriate campaign to publicise this for flooding as well as other types of incident. Our preference would be for Government to develop a Resilience website template for all LRFs which they host securely on a resilient government platform, but which could be populated and maintained locally.
		(IC 68) Essential service providers should maintain continuous provision of public information during an emergency through a website linked to other responders and local authority contact centres.	Please see response to IC67 through which this could also be delivered.
		(IC 69) Government should work towards a single definitive set of flood-related health advice for householders and businesses which can be used by the media and the authorities both locally and nationally.	We would propose that it would be more effective if DEFRA or the CCS co-ordinated the development of one comprehensive leaflet which covers all aspects of recovering from flooding to replace the huge number prepared by the many organisations with a role: general who does what (LAs); insurance (ABI); rogue builders (Trading Standards); crisis loans (DWP); public health and clean-up (CIEH); as well as other leaflets provided by the EA or water companies.
		(IC 70) Council leaders and chief executives play a prominent role in public reassurance and advice through the local media during a flooding emergency as part of a co-ordinated effort overseen by Gold commanders.	We agree with this as a principle, but this depends very much on the culture of the Council and this cannot be legislated for. In the earlier stages it may be enough for the Gold Commander to do this, but this could not be sustained into a recovery operation. The key issues are that there are visible leaders providing effective messages of reassurance and advice. Affected authorities have reported that taking a prominent public role in last summers floods was extremely helpful in reassuring the public and providing useful

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			information. Local radio was also an extremely useful medium and in many instances provided an essential source of information and a vital link between the public and the emergency services and local authority spokespersons.
	The Role of Communities and Individuals	(REC 13) LRFs should urgently make arrangements to involve local media representatives in the local preparedness and response to support their public information role.	<p>We agree and this is being picked-up in the LRF's response to the recent letter from the Cabinet Office on the urgent recommendations.</p> <p>Case studies of how local authorities worked with their local media in recent flooding emergencies would be very useful in sharing good practice and we recommend that this would be a useful and relatively quick piece of analysis and guidance.</p>
		(IC 71) Flood risk should be made part of the mandatory search requirements when people buy property and should form part of the Home Improvement Packs.	We agree.
		(IC 72) The Government should launch a public information campaign which draws on a single definitive set of flood prevention and mitigation advice for householders and businesses and which can be used by media and the authorities locally and nationally.	<p>We agree with this. Please refer to our response to IC69. We would add that flood prevention devices should also be taken to include sump pumps for cellars, etc, for dealing with groundwater flooding.</p> <p>We recommend that any public information campaign is informed by and developed within the context of work on climate change and the increased likelihood of more extreme weather in the future.</p> <p>Local authorities are developing local climate change strategies and campaigns which will encompass mitigation advice. It will be useful for government to work with authorities which are already leading in this area in developing the most effective advice and messages.</p>
		(REC 14) Members of the public should make-up a flood kit - including key personal documents, insurance policy, emergency contact numbers (including local council, emergency services and Floodline - 0845 988 1188), torch, battery or wind.	We agree. As part of a wider rethink by Government around the role of the public prior to and during emergencies (see IC64), this could mark an important first step towards 'community resilience' in which the public are educated into realising that they have an important role in preparing themselves for emergencies rather than being passive recipients of a 'service'. This step might be made more palatable if Government procured a partner to develop template 'flood kits' which could be bought 'off-the-shelf' at low cost and which the public could then supplement with local information and their own possessions as suggested under REC 15.
		<p>(REC 15) Members of the public should increase their personal state of readiness and resilience to floods by following the EA's practical advice, where appropriate, as summarised below:</p> <ul style="list-style-type: none"> • Make sure you have adequate insurance. Flood damage is included in most buildings insurance policies but do check your home and contents are covered. • Access the EA's website to check flood risks to property (this can be followed up by advice from the Agency, for example whether the property in question is protected to some degree by physical defences. • Contact the EA to be registered on their Flood Warnings Direct scheme (however, this does not apply to surface water flooding or sewerage flooding and people should also make sure they remain alert to weather forecasts). • Keep vital possessions, such as financial and legal documents 	<p>We agree and would reiterate comments made under REC 14 above.</p> <p>We recommend that the insurance industry helps to reinforce a culture of resilience by considering the use of incentives for policy holders who actively help to prevent flood risk and damage.</p>

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		<p>and items of sentimental value, upstairs or stored as high as possible in waterproof containers and have plans in place to move items at short notice.</p> <ul style="list-style-type: none"> • Make a list of other useful numbers you may need - your local council, the emergency services and your Floodline quick dial number. • Make sure you know where to turn off your gas, electricity and water. If you are not sure, ask the person who checks your meter when they next visit. Mark the tap or switch with a sticker to help you remember. 	
Recovering from the floods	Health and Well-being	<p>(IC 73) Local recovery co-ordinating groups should ensure that coherent health and well-being support is readily available to those affected by flooding, using a variety of sources including voluntary and community groups.</p>	<p>This information and support should be made available. However, this should be accessed via a single portal (see IC 69) that is publicised and made readily available, although this may be disseminated through a number of processes identified by local co-ordinating groups. The extent of the impact on the community can be long-term, sometimes years, and any support should recognise this and plan accordingly, particularly when reviewing the array of options to deliver such a service.</p>
		<p>(IC 74) The monitoring of impacts on health and well-being, and actions to mitigate and manage the effects should form a systematic part of recovery work at the local level.</p>	<p>We agree, but also see comments for IC 73.</p>
	Public Communication and Engagement	<p>(IC 75) Communication strategies during recovery need to be agreed at the outset by all recovery co-ordinating groups and focus on reassurance, advice and progress.</p>	<p>We agree, although this should form part of the recovery planning process and any recovery plan developed. The latter should recognise that aspects of the recovery process, including an assessment of communication strategies, should begin during the response stage so that systems are in place when response hands over to recovery (see also comments for IC73).</p>
		<p>(IC 76) Local authorities should co-ordinate a systematic programme of community engagement in their area during the recovery phase.</p>	<p>We agree and are pleased that the need for communities to be consulted in planning for recovery has been noted.</p>
	Roles, Responsibilities and Recovery Operations	<p>(IC 77) Central government recovery co-ordinating groups should be established from the outset of major emergencies and in due course there should be formal handover from the crisis machinery to the recovery co-ordinating group - normally chaired by the minister of the lead government department for recovery.</p>	<p>We agree and would suggest that this model is adopted at the local level.</p>
		<p>(IC 78) Communities and Local Government should have lead responsibility within central government for co-ordinating recovery from wide-area flooding emergencies.</p>	<p>If the lead department concept is to stay in place, then we would agree that this is appropriate. This should be accompanied by appropriate training and exercising to enable the department to discharge its functions.</p>
		<p>(IC 79) Roles and objectives of those in central government responsible for recovery should be developed on the basis of the model employed during the recovery from last summer's floods, and that these standing arrangements should be set out in the Concept of Operations (CONOPS) for central government's response to emergencies.</p>	<p>We agree.</p>
		<p>(IC 80) Central government guidance to local responders - Emergency Response and Recovery - should be updated to reflect the new formalised arrangements for recovery.</p>	<p>We agree that this requires a review, but we would suggest that this is done as part of the forthcoming CCA review.</p>
		<p>(IC 81) All Local Resilience Forums should plan, train and exercise on the basis of the recently published National Recovery Guidance.</p>	<p>We agree. We are encouraged that this reflects our thoughts that recovery is not just a local authority issue, but the responsibility of many of those involved in response as well depending on the incident. This should also include existing Category 2 responders who may be key stakeholders in recovery</p>

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		(IC 82) Local authorities should have a clear plan for harnessing voluntary and community resources during the recovery phase.	from flooding. We agree, but feel this should go beyond the scope of voluntary and community resources and identify others that would be involved in the different aspects of recovery, e.g. business community, civic trusts, universities, or current strategic delivery partnerships.
		(IC 83) For recovery from emergencies spanning more than a single local authority area, the Government Offices should enable coherence and co-ordination, if necessary, between recovery operations in different local authorities.	We agree that there needs to be as much coherence and consistency as possible, but would note that in the absence of a single control structure there will always be differences. Moreover, local recovery operations need to address the needs of the specific communities and local authority staff will no doubt do what they feel is in the best interests of their communities rather than second-guessing peer authorities. Authorities will look to Government Offices for support and linkages to central government assistance. For the long-term, Government needs to take a view on whether recovery for wider areas needs to be led at a different, higher level. If this is the case, who leads and how should the different districts interact? We would suggest that this issue is more complex than the IC suggests.
		(IC 84) The Local Government Association and Government Offices should develop arrangements to provide advice and support from organisations experienced in recovery to areas dealing with recovery from an emergency.	We agree that sharing experience and best practice is highly desirable and that this should be done in advance rather than during incidents, if possible. However, although the LGA is very willing to help identify and promote good practice, this IC may overestimate how far the LGA can help this process along given limited resources on emergency planning work. Perhaps this work should remain with the National Recovery Working Group working with the Government Offices. Alternatively, perhaps the Emergency Planning College could play a more active role in disseminating this type of information (please see IC 92 below on lessons learned).
		((IC 85) There needs to be an agreed framework - including definitions and timescales - for local-central recovery reporting, and that this should be included in all relevant government guidance.	We agree that this is an area that needs to be addressed as requests for information by central and regional government can be time-consuming and disruptive while an agency is trying to respond to the needs of the community during an incident which will always take precedence in our priorities. There sometimes seems to be an inability on the part of Government to grasp that the public has no obligation to report that they have been flooded or abandoned their homes and that local authorities may not find this out for a long time, if at all. These requests are made on Cat. 1 agencies, including councils, with clear statutory duties under the CCA by a Government which is exempt from any statutory burdens itself, which suggests a lack of accountability. Moreover, our member authorities have concerns that the information sought is often too wide-ranging, seemingly pointless (why do ministers need to know the proportion of owner-occupiers flooded versus council tenants ?), and with very short deadlines. Finally, this process should be more two-way with government offices giving something back to responders in the thick of a response, e.g. concrete financial support, resources and mutual aid etc. The following factors should be picked-up:

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			<ul style="list-style-type: none"> - what information is required and for what purpose ? - how often is this is needed ? - is Government prepared to accept that only provisional information is available and this might be as good as it gets ? - how is reporting this information going to be of benefit locally ? - is there a standard format for this to be reported which can be integrated with the Cat 1 responders own reporting systems ? - could this requirement not form part of the Regional Extranet application being pursued by the CCS so that information could be directly input at times more convenient to the responder or so that the data of multiple agencies can be brought together ? <p>Our responses to IC 6 and IC 17 alluded to the need for there to be better information-sharing and systems developed for responders to share data in emergencies. This is particularly important for flooding emergencies as affected people report flooding to many different bodies, including councils, water companies, the EA, Fire Services, and especially insurance companies. Government could facilitate a huge step forward if it were to define a new data collection framework in advance (and resolve any data protection issues) and implement operational systems for these organisations to pool information about which properties have flooded for use in incidents. This would benefit our responses and provide ministers with the information they request.</p>
	Funding for recovery	(IC 86) Local authorities should continue to make arrangements to bear the costs of recovery for all but the most exceptional emergencies, and should revisit their reserve and insurance arrangements in light of last summer's floods.	<p>We do not agree with the conclusion as it is framed. It appears to pay little regard to some of the realities of local government funding and the degree to which insurance policies make allowance for self-insurance these days. Also, we do not insure other parts of the infrastructure owned by others which may need to be reinstated. Most councils do already bear the costs of recovery for minor emergencies, given that Bellwin does not apply. Most local authorities do think it prudent to have adequate reserves, but the extent of these has to be weighed against the investment needs for services etc. We think this IC should set-out exactly when it felt that central authorities should actually provide support to local authorities and if it was able to define 'exceptional emergencies' ?</p> <p>The issue of recovery needs to be addressed as part of a comprehensive review of the Bellwin Scheme.</p>
		(IC 87) Central government should have pre-planned rather than ad hoc arrangements to contribute towards the financial burden of recovery from the most exceptional emergencies.	We agree, but please refer to IC 86.
		(IC 88) Any future model for financial assistance should be designed to minimise unnecessary expenditure and maximise value for money for public finances collectively, rather than singularly for central or local government	We agree, but stress that any development of work looking into this should involve all key stakeholders.
		(IC 89) Arrangements for distributing any financial assistance during the recovery phase should be transparent and equitable.	We agree. We would also suggest that Government considers the merits of setting-up a national system or model for the distribution using the local community foundations or the Red Cross so that there is consistency and also an additional

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			burden is taken off local authorities at a time when they are already stretched.
	Normalisation and Regeneration	(IC 90) The aims and objectives for the recovery phase should be agreed at the outset by recovery coordinating groups to provide focus and enable orderly transition into mainstream programmes when multi-agency coordination of recovery is no longer required.	We agree.
		(IC 91) Recovery coordinating groups should make early strategic decisions about longer-term regeneration and economic development opportunities during and after recovery.	We agree.
		(IC 92) Recovery co-ordinating groups should evaluate and share lessons from both the response and recovery phases to inform their planning for future emergencies.	<p>Identifying lessons learned is a standard part of the emergency planning cycle for responders directly involved in an incident. However, there are two problems with this key concept.</p> <p>Firstly, authorities have reported that partners do not always participate in these processes because they are overstretched or because the CCA duties upon them are too weak (e.g. water companies).</p> <p>Secondly, the scope of application for these lessons learned can go far beyond immediate areas, so there needs to be a national mechanism for ensuring that the lessons of Carlisle or Doncaster can be learned by other areas. However, we do not have an Emergency Management Agency resourced to do this as in some countries, nor a national database of lessons learned which could be accessed by all relevant stakeholders. In the absence of these, applying the lessons depends on an independent review, the CCS or GOs doing something on ad hoc basis or the goodwill of those affected in put together presentations. This is far from ideal though. (Please also see IC 84).</p> <p>We would also suggest that this recommendation should be extended to include a requirement that local authorities, the EA and the water companies collaborate on investigation of the causes of the flooding.</p>