

Date: 31st March 2008
Our ref:
Your ref:



Sir Michael Pitt
The Pitt Review
Cabinet Office
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Dear Sir Michael,

Natural England's Response to *Learning Lessons from the 2007 Floods: An Independent Review by Sir Michael Pitt*

Natural England would like to congratulate you and your team on the extensive and insightful analysis contained in *Learning Lessons from the 2007 Floods – An Independent Review*. We are also pleased to accept your invitation to submit views on the Review's Interim Conclusions and to take part in a discussion over the coming months on the measures that need to be adopted to help the country deal more effectively with future flooding incidents.

Please find attached our response to the Review at this interim juncture. We have confined our comments to Interim Conclusion 31, which refers directly to Natural England and deals with the themes that were at the heart of our written submission to the Review.

If you would like to discuss our views in more detail, please contact Rob Cathcart in our policy team (rob.cathcart@naturalengland.org.uk 01733 455 595).

Yours sincerely

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Natural England's Response to *Learning Lessons from the 2007 Floods: An Independent Review by Sir Michael Pitt*

Interim Conclusion 31

"DEFRA, the Environment Agency 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."

Natural England welcomes the Review's recognition (section 4.62) that it is not sustainable from an economic, environmental or engineering perspective to manage all flood risk through the construction of ever bigger and more extensive hard defences. Central to our evidence to the Review – and clearly this is a view shared by many other consultees – was the assertion that complementary natural solutions in the wider catchment have a vital role to play in mitigating flood risk and helping both fluvial and coastal systems to adapt to climate change.

We stressed that restoration or re-creation of wetlands, particularly washland storage, realignment of river channels and floodplain restoration, can – given appropriate circumstances and intelligent design – slow flood flows, increase flood storage capacity, and create more absorbent catchments.

This integrated approach offers the prospect of multiple benefits for society: mitigation of flood risk, enhanced biodiversity, natural resource protection and climate change adaptation.

We welcome the fact that the Review (section 4.68) acknowledged our concerns that the current system of flood risk management planning is not widely delivering these types of solution on the ground. Moreover, Interim Conclusion 31 urges DEFRA, the Environment Agency and Natural England to take positive steps to remedy this deficiency.

Natural England has already begun discussions with these organisations on how we can best give effect to the aspirations of Interim Conclusion 31, and we thought it would be helpful to share our preferred approach with you pending your final conclusions in the Summer.

Natural England believes that the establishment of a joint programme to achieve greater working with natural processes is essential. There is already established a strategic framework for the management of flood and coastal erosion risk through Catchment Flood Management Plans and Shoreline Management Plans. We believe that it is appropriate for this framework to

continue and that we should not be seeking to devise a replacement.

However, there is merit in establishing a programme, as proposed by Interim Conclusion 31, to examine the ways in which this strategic planning framework can be improved and so increasingly deliver schemes that work with natural processes. Indeed, there are a number of potentially productive areas of work that we believe the programme could explore:

1. **Catchment stewardship** – An examination of how overall “catchment stewardship” can be better integrated to ensure that flood risk and land-use management considerations are better aligned. For example, Catchment Flood Management Plans need more effective linkages with Environmental Stewardship targeting to ensure that opportunities for washland storage and wetland creation are realised. We increasingly have spatial planning tools that can inform this process, such as the Wetland Vision mapping resource – developed by Natural England, the Environment Agency and other partners to identify areas of potential wetland restoration or re-creation. For example, flood risk management funds could be used to create washland storage, while Higher Level Scheme funding could enhance its potential for breeding waders by paying farmers to retain water levels within 10-15 cm of the soil surface in the Spring and early Summer.

The programme could also usefully examine how flood risk management requirements and the land-use planning system can be better aligned to ensure that new development is appropriately located in relation to floodplains and eroding coasts. It is vital that space is provided for natural processes to function and for managed realignment, at the coast and in river floodplains, to be a realistic opportunity.

2. **Effective incentives** – DEFRA’s new Outcome Measures framework for allocating flood risk management expenditure has been designed to generate schemes that fulfil the aspirations of *Making Space for Water*, including integrated schemes that work with natural processes. However, it has yet to be used in anger and we are currently unsure whether it will provide adequate incentives. The programme could usefully examine how an appropriate priority-scoring system – the mechanism within the Outcome Measures framework that rates proposed schemes – should operate to deliver integrated schemes, taking account of factors such as sustainability and climate change adaptation. Until now, driven by simple cost-benefit calculations, the system has had a tendency to deliver traditional concrete defences almost exclusively. How do we make the priority scoring system more intelligent and therefore more encouraging of project proposals for integrated schemes?

3. **Project appraisal guidance** – DEFRA publishes a suite of Project Appraisal Guidance documents to advise flood operating authorities on best practice for the appraisal and development of

schemes. The package of guidance is due for revision and this opportunity to update the environmental guidance volume, in particular, could usefully be explored by the programme as a means of influencing the design and development of appropriate schemes.

4. **Identifying appropriate sites** – The predisposition of the project-planning and funding systems to encourage the development of traditional hard-defence schemes has meant that sites that could feasibly host integrated schemes have often been overlooked. Natural England believes that the programme should collate information on potential sites that could host schemes that work with natural processes and, as a next step, recommend a select number for fast-track implementation as demonstration projects.

5. **Dedicated funding** – The programme could usefully consider the potential role of a dedicated fund to support the identification of appropriate sites and the development of demonstration projects.

6. **Grip-blocking and re-alignment** – As you will know from our written evidence, Natural England advocates a strategic programme of grip-blocking in the uplands and more rapid progress towards managed realignment in both coastal and fluvial floodplains. We believe that a joint programme established as suggested under Interim Conclusion 31 could provide critical momentum for delivering in these areas. It could provide a decisive national focus, identifying locations for strategic intervention and helping to remove blockages in the planning and funding systems.

Natural England hopes that the above proposals point to some useful options that a joint programme could explore at its inception. We would be pleased to amplify these points, and in person if you feel that such discussions would be helpful.

Rob Cooke

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