

APPG for Flooding and Flooded Communities

4-5pm on May 6th, Room N PCH.

Attendees

- Helen Morgan MP (Chair)
- Guest speakers:
 - Rob Allen (Policy Connect)
 - Hugh Ellis (Town and Country Planning Association)
 - Tracey Garrett (National Flood Forum)
- APPG members and stakeholders

1. Chair's Welcome and Introduction

Helen Morgan welcomed attendees and outlined the meeting's focus on the impact of the Planning and Infrastructure Bill on current and future flood risk.

Key opening statistics:

- 109,000 homes built in flood zones 2 & 3 since 2013/14
- 70,000 new homes not covered by FloodRe
- 20,000 homes built without flood defences
- Homes built after 2009 are excluded from the FloodRe scheme

2. Speaker Presentations

2.1 Rob Allen – Policy Connect

Topic: The Planning and Infrastructure Bill and Flood Risk

- Policy Connect's *Bricks and Water* reports examine flood resilience in built environments.
- **Concerns with the Bill:**
 - No reference to flooding, flood risk management, or coastal change.
 - EA flood risk guidance often ignored or legally challenged.
 - Example: 200 homes in North Somerset (Flood Zone 3) approved despite failing the sequential test due to housing demand arguments.
- **Recommendations:**
 - Move the **sequential test into law** to enforce compliance.
 - Amend **Clause 44** to allow cost recovery for enforcement, not just application processing.
 - Implement **Schedule 3 of the Flood and Water Management Act** for managing surface water and wider adoption of SUDS.
 - Require **Property Flood Resilience (PFR)** measures in all new homes, including "no regret" features like raised sockets and flood-resilient materials.

- **Summary:** None of these proposed changes conflict with housing growth targets, but flood resilience must be built in from the start.

2.2 Hugh Ellis – Town and Country Planning Association

Topic: Sustainable Planning and Building Communities

- **Criticism of the Bill:**
 - Climate risk not addressed in public bill committee evidence.
 - No reference to flood risk, overheating, or adaptation.
- **Key points:**
 - Adaptation is critical for future GDP growth (Climate Change Committee).
 - Opposition between resilience and growth is a false narrative—resilient design is achievable.
 - Post-2039, without FloodRe, homes built today may become uninsurable liabilities.
 - Current flood defence policies are poorly implemented—sequential and exception tests are weakly enforced.
- **Proposal:**
 - Add a new section titled “**Resilience**” to the Bill.
 - Legally tie planning systems to the **Climate Change Act** to ensure flood and climate resilience.
- **Conclusion:** This Bill is a unique opportunity to legislate for long-term resilience.

2.3 Tracey Garrett – National Flood Forum

Topic: Concerns and Experiences of Flood-Affected Communities

- The NFF receives over 1,000 calls a year—often from vulnerable residents affected by recent developments causing flooding.
- **Common complaints:**
 - New builds diverting water onto existing homes.
 - Building on natural flood storage areas.
 - Overwhelmed local drainage systems.
 - Lack of enforcement or response from authorities.
- **Impacts:**
 - Emotional trauma (e.g., PTSD), long-term displacement, and financial burdens.
- **Calls to Action:**
 - Implement Schedule 3.
 - Respect the sequential test and avoid flood plains.
 - Include communities’ voices in development decisions.

3. Q\&A and Discussion Points

Topics raised during the discussion included:

- **VAT Disparities:** VAT applies to renovation but not new builds—this incentivises risky new development.
- **Under-resourced Local Authorities:** Inability to properly assess, condition, and enforce planning applications.
- **Insurance Post-2039:** Risk of homes becoming uninsurable when FloodRe ends.
- **Alternative Design Approaches:** Raised homes (stilts), sacrificial basements (e.g., River Severn).
- **Historic Planning Errors:** Developments approved before current data cause ongoing flooding (e.g., 900 homes in Leicestershire).
- **SUDS:** Management, off-site implementation, and long-term maintenance responsibility issues.
- **Groundwater and Small Development:** Lack of inspection and data.
- **Fragmented Governance:** Multiple bodies overseeing flood risk management, many underfunded.
- **Right to Appeal:** Developers often have appeal routes that residents do not.
- **Local Knowledge & Democracy:** Neighbourhood plans and community input often sidelined.

4. Chair's Summary and Next Steps

Helen Morgan MP emphasized the importance of creating **realistic, cross-party recommendations** that:

- Promote **better enforcement**.
- Push for **adoption of Schedule 3**.
- Centre the **voice of communities** in development decisions.

A **draft recommendation letter** will be prepared for review, incorporating the discussions and expert inputs shared during the meeting.

Meeting closed at 5:00 PM.