



Department
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Sir John Armitt
National Infrastructure Commission
Via email

Your ref: xxx
Our ref: xxx

14 July 2020

Dear Sir John,

I am writing about the flood related recommendations in your first National Infrastructure Assessment.

I must start by saying that I am very grateful to the National Infrastructure Commission (NIC) for its first ever flagship National Infrastructure Assessment. This once-a-Parliament assessment provides an ambitious, credible and long-term vision with wide ranging and significant recommendations across all areas of economic infrastructure. The government will respond formally to all of NIC's recommendations by publishing another first of its kind, a National Infrastructure Strategy.

Ahead of that National Infrastructure Strategy, we are publishing a government policy statement on flooding and coastal erosion which sets out our long-term ambition to create a nation more resilient to future flood and coastal erosion risk. The government policy statement includes a broad range of policies and actions which will build a more resilient nation. These include policies which address the flood and coast matters raised by NIC, including:

- Our ambitious new 6 year funding programme to deliver longer term certainty and unlock greater efficiency in infrastructure funding. The doubling of government investment shows our level of ambition, and recognition of the increasing pressures posed by climate change and population growth. It exceeds the level of investment which NIC recommended;
- Strengthening strategic planning for flood and coastal risk management, based on catchments and coastal cells, and making local flood and coastal erosion plans clearer and more ambitious;
- Action to strengthen local understanding of surface water flood risk and better manage the impacts; and
- How we will maintain and enhance our planning policies to direct new development away from areas at risk and ensure that new developments take into account future climate change and do not increase flood risk elsewhere.

I hope you agree these policies recognise and reflect the NICs findings and proposals.

In particular, I wanted to explain our thinking on nationwide standards of flood resilience. We agree on the need for a broad focus on overall resilience to flooding. This includes better protecting and better preparing people and places to reduce the harm caused by flooding. These risks are growing as a result of climate change and population growth, and



so we have an ambitious agenda to meet the increasing challenges. The government has clearly demonstrated its ambitious approach and serious commitment to tackling flooding and coastal erosion. The doubling of the amount we invest in the flood and coastal defences programme in England to £5.2 billion over the six years from 2021-27 is a good example of this. Our new £200m innovative flood resilience programme will also deliver broader resilience actions in 25 places across the country.

Whilst we welcome NIC's work on resilience, we do not consider that standards of resilience to flooding are the right approach. The responses to our call for evidence on resilience in flood and coast contexts, and our research exploring different approaches to resilience, have demonstrated that there is no agreed understanding of resilience and no established method for assessing and quantifying flood resilience. Developing such a method, and then any resilience standards based on it, would be a complicated and resource intensive process, and would not be effective for engaging the people and communities who are facing flood risks. We are keen instead to focus resources on taking action and providing real, tangible improvements for those at risk.

There are significant variations between local areas in the risks faced, potential for action and vulnerability of communities. A standard which is achievable across the whole country would, inevitably, be a "lowest common denominator". Whilst your report proposed that cities should have a higher standard than rural areas, we believe this approach may heighten differences between the different parts of the country rather than address them. Setting standards based on population density may also create artificial distinctions between places, overlooking the reliance of large cities on their surrounding catchments.

In summary, our policy statement sets out an alternative approach, rather than resilience standards, but is focused on a similar vision. It will drive progress and maximise the effectiveness of investment in the following ways:

- We will continue to use established and effective cost-benefit approaches to prioritise and target flood funding for maximum benefit, and will further develop and improve our approaches, taking into account the full range of resilience actions, both individually and in combination;
- We will strengthen local flood plans in future to provide a framework for action and investment in local areas; and
- So that we can measure and demonstrate progress, we will develop a national set of indicators to monitor trends over time, and the local picture, and better understand the impacts of our policies. We will also improve the reporting of national and local progress towards our goals so that it is clearer and more accessible.

Our policy statement provides a strong foundation on which to drive forward action to improve resilience to flooding and coastal erosion both nationally and locally. I hope you find this explanation helpful in advance of a government response to NIC's overall recommendations in the National Infrastructure Strategy.

Thank you again for all your work in this area. It has been very helpful in informing our policy development.



RT HON GEORGE EUSTICE MP