



7 August 2013

Flood Insurance Consultation
Department for Environment, Food and Rural Affairs
3rd Floor, Nobel House
17 Smith Square
London SW1P 3JR

Dear Sir,

RESPONSE OF CPA TO DEFRA CONSULTATION ON HOME INSURANCE IN AREAS OF FLOOD RISK

The City Property Association (CPA) is pleased to respond to the consultation by the Department for Environment Food and Rural Affairs on 'Securing the future availability and affordability of home insurance in areas of flood risk'.

The City Property Association was established in 1904 and represents the interests of property owners and occupiers in the City of London. It has 180 members, including most of the major developers active in the City of London at the present time. A membership list is attached.

We have seen the response of the British Property Federation, with which the CPA broadly agrees. In particular, the CPA supports the proposal for Flood Re. However we would qualify this support with the following observations:

- (a) We believe that the Government should consider extending Flood Re to cover commercial property as well as residential, and in particular it should certainly cover SMEs;
- (b) We believe that a way should be found for properties built after 2009 (those at risk being relatively few) to be included in Flood Re, to avoid the inevitable blight which would result.

We hope this is helpful.

Yours sincerely,

Paul Houston
Secretary

CITY PROPERTY ASSOCIATION

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LIST OF CPA MEMBERS, 31 JULY 2013

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|------------------------------------|--------------------------------|
| 8build | Dorsey & Whitney (Europe) LLP |
| Academy Consulting solutions | DP9 Ltd |
| AECOM | DTZ |
| Aedas Architects | E C Harris |
| ARUP | EPR Architects Ltd |
| Ashurst LLP | Evans Randall |
| Aukett Fitzroy Robinson | Eversheds |
| Balfour Beatty Construction | Exemplar Properties |
| Bennetts Associates | F & C Property Management |
| Berwin Leighton Paisner | Farebrother |
| BBG Real Estate Advisors | Foggo Associates |
| Bouygues UK | Foster and Partners |
| Bovis Lend Lease | Freshfield Bruckhaus Deringer |
| Broadgate Estate Ltd | Gardiner & Theobald |
| Brookfield Developments Europe Ltd | Gensler |
| Buro Four | Gerald Eve LLP |
| Campbell Architects | Gibberd |
| Canary Wharf Limited | GL Hearn |
| Cannings Connolly | Gleeds |
| Capita Symonds | Glenn Howells |
| Capital Real Estate Partners LLP | GM Real Estate |
| CBRE | GMW Architects |
| CgMs | Goldman Sachs |
| City of London | Gordon Ingram Associates |
| Clifford Chance | Great Portland Estates plc |
| Cluttons LLP | Greycoat Real Estate LLP |
| CMS Cameron McKenna LLP | Hayes Davidson |
| Collyer Bristow LLP | Helical Bar |
| Colville Estate | Herbert Smith Freehills LLP |
| Como Group | Hermes |
| CORE Offices Real Estate LLP | Heron Property Corporation Ltd |
| CPC Project Services LLP | Hilson Moran |
| Cundall | Hines UK Ltd |
| Curtins Consulting Ltd | Hoare Lea |
| Cushman & Wakefield LLP | Houghton Properties |
| DAC Beachcroft LLP | Hurley Palmer Flatt |
| Dechert LLP | Indigo Planning |
| Deloitte | Ingleby Trice |
| Derwent London plc | Irwin Mitchell |
| Development Securities | J Peiser Wainwright |
| DLA Piper UK LLP | Jackson Coles LLP |

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Jardine Lloyd T Group plc
John Robertson Architects
Jones Lang LaSalle
JP Morgan Chase Bank NA
Kingston Smith
KKS Strategy LLP
Knight Frank
Land Securities plc
Landmark Chambers
Landmark plc
Lawrence Graham
Legal and General Property Ltd
Linklaters LLP
Lockton Real Estate
London Real Estate Advisors LLP
M3 Consulting
Mace Group
Make Architects
Malcolm Hollis
Mansell Construction Services Ltd
Marsh Ltd
Mayer Brown International LLP
McLaren Construction Group
Memery Crystal LLP
Miller Construction
Minerva Corporation Plc
Mitsui
MJP Architects
Momentum Transport Planning
Montagu Evans LLP
Morgan Sindall
MPG Shreeves LLP
Museum of London Archaeology Service
Nabarro
Newton Perkins LLP
Norton Rose Fulbright LLP
Olswang LLP
Orbit Architects
Ordnance Survey
Orion Capital Managers(UK)Ltd
Orrick Herrington Sutcliffe (Europe) LLP
Oxford Properties Management UK Ltd
Paul Davis + Partners
Pell Frischmann
Pellings LLP
Pilbrow & Partners

Potter Raper Partnership
PricewaterhouseCoopers
QCIC Group
Quadrant Estates
Reed Smith LLP
Reynolds Porter Chamberlain LLP
Ridgeford Properties
Rolfe Judd
Rook Rider Solicitors LLP
RREEF UK Office Property Funds
Scott Brownrigg
Second London Wall (SLW) Project Management
Sheperd & Wedderburn
Sheppard Robson
Simmons & Simmons
Sir Robert McAlpine Ltd
SJBerwin LLP
Skanska Construction UK Ltd
Slaughter & May
Standard Life Investments
Stanhope plc
Steer Davies Gleave
Stephan Reinke Architects
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T P Bennett
Tate Hindle
Taylor Vinters Services Ltd
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Telereal Trillium
The Blackstone Group
The British Land Company PLC
The Mercer's Company
Thomas & Adamson
Tishman Speyer
TLT LLP
Topland Group Plc
Transport for London
Trehearne Architects
Tuffin Ferraby Taylor LLP
Turley Associates
UBS
URS Infrastructure & Environment UK Limited
Waterman Group
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Wilkinson Eyre Architects
Willis UK and Ireland

Willmott Dixon
WRBC Services Ltd

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