



Department  
for Environment  
Food & Rural Affairs

# Government response to the Multi-Agency Flood Plan Review

January 2019



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## Introduction

1. In November 2017 Major General (ret'd) Tim Cross CBE was asked by the Secretary of State for Environment, Food and Rural Affairs to conduct a review on Multi-Agency Flood Plans, and in May 2018 the government published his findings.
2. The review was commissioned as part of the government's ongoing work to address flood risk, and acknowledged the fact that over the last few years a great deal of experience has been gained from flood events, and good practice has evolved. The review sought to identify cases of good practice and investigate how these might be spread more consistently across the country. Flood resilience planning forms part of the wider work the government is taking forward on national resilience, and the review was conducted with due consideration of this.
3. This paper sets out the government's response to the conclusions and recommendations in the Multi-Agency Flood Plan review. The government is grateful to General Cross for conducting the review and for local partners and organisations who have been generous with their feedback and support on the work. The government has already started to take key actions to strengthen flood emergency planning and response, and will continue to do so.

## The review

4. In England, Multi-Agency Flood Plans are written and held by local resilience forums, of which there are 38 across the country. In the review, General Cross came to the conclusion that currently, flood planning and response to minor and medium scale flooding in the country would be managed comfortably by local resilience forums and local responders. Equally, he noted that communities that experience frequent flooding have good processes and plans in place. Where his concern lay was with the possibility of widespread and enduring flooding hitting on a scale worse than that which the country saw in the 2015/2016 floods in Cumbria, Lancashire and Yorkshire. His conclusions and recommendations addressed the necessity to upgrade the robustness of flood plans in England by tackling a wide range of factors that affect standards of planning and preparedness for major flood events.
5. Many of the recommendations align with the government's ambition to strengthen community resilience to flooding and this was outlined in the statement launching the review made by the Secretary of State for Environment Food and Rural Affairs, laid in Parliament on 3 November 2017 via a written ministerial statement.<sup>1</sup> The statement

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<sup>1</sup> <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2017-11-03/HCWS221/>

set out the ongoing work to improve flood resilience, and committed to providing a considered response to the review.

6. The government accepts many of the key principles of the review and has already started to take action on a number of the recommendations. This document recognises the significant work already underway since publication of the review in May 2018.
7. In the research phase of the review, General Cross consulted extensively with local resilience forums, and the government has continued to engage with them to explore options to address the recommendations. The underpinning principle remains that local resilience forums need to feel supported by the government, without being constrained by regulations that may be unsuitable to local activity and inadvertently limit flexibility.
8. Multi-Agency Flood Plans are owned by local resilience forums and as such many of the recommendations in the review are aimed at action being taken at a local level. Due to a local resilience forum's status as a non-legal entity, it is important to note that much of this document makes reference to actions that government would encourage local resilience forums to take, but that are not legislative. This reflects General Cross' view, which the government agrees with, that local resilience forums are performing well and the current system and legislative framework is fit for purpose. This response therefore proposes to outline ways in which the government will support and provide clarity where needed.

## Response to conclusions and recommendations

### Improved Multi-Agency Flood Plans

9. The government fully supports the recommendation to create a risk-specific emergency flood standard which will form part of the Cabinet Office core set of National Resilience standards for local resilience forums in England. The aim of the standard is to support local resilience forums by clearly laying out their statutory duties under the Civil Contingencies Act 2004 among other legislation, and outlining good and leading practice for local resilience forums when responding to an emergency flooding incident.
10. The standard will be released alongside revised guidance on writing Multi-Agency Flood Plans. The government recognises the need to provide an updated version of the guidance, which was written in 2011, to better reflect the needs of local resilience forums. This is particularly true in light of technological developments such as ResilienceDirect which help move towards digital systems of storing and updating live

data. The government has engaged with local resilience forums on the guidance, and held two workshops in October 2018 which provided positive opportunities to gather feedback from local resilience forum partners across the country. The revised guidance will signpost online guidance and data, and include a framework for writing Multi-Agency Flood Plans to encourage a consistent approach and ease of transfer across local resilience forums.

11. The revised guidance and new standard form a complementary support package for local resilience forums and will be released for consultation in early 2019.
12. Individual local resilience forums are responsible for owning a Multi-Agency Flood Plan and making sure it is of a sufficiently high standard. The government supports the recommendation that an agreed and consistent system of assurance should be spread across local resilience forums, to monitor standards and promote continuous improvement. The government believes that this should take place in the form of regular self-assurance, using the standard and revised guidance as benchmarks to check that requirements are being met.
13. The revised guidance will recommend that partners within local resilience forums, including the Environment Agency, should actively seek the views of practitioners from other local resilience forums. The government is keen that peer review of this kind is encouraged, as this will in turn help promote consistency across local resilience forums. It will provide a process whereby best practice can be widely shared by practitioners with a broad range of experience and knowledge of emergency response.
14. In addition to this, the Environment Agency will provide support by performing a health-check on Multi-Agency Flood Plans once every three years. This will commence one year after the release of the revised guidance and standard, to allow local resilience forums time to implement changes and test their plans. The government believes that practitioners from the Environment Agency with expert knowledge and understanding of emergency planning will be well placed to perform these checks, which are intended to provide local resilience forums with an additional layer of support and direction.

## **Funding for flood emergency response**

15. The hazard posed by flooding is expected to increase in the coming decades as climate change causes sea levels to rise and extreme weather to occur more frequently. This is in addition to increasing urban development and population growth in flood risk areas magnifying the impact of flooding. General Cross noted that the increased risk is likely to bring about flooding that cannot be mitigated completely by hard defences, and therefore more investment needs to be directed towards response and resilience. The government agrees that it is necessary to examine the balance of capital and resource funding, in order to make sure that the capability for

emergency flood response needs is met. It will continue to critically monitor financial requirements, to ensure that there is adequate funding to meet emergency response standards as reinforcement to the tangible need to improve and maintain defences.

16. The government currently assesses the number of rapidly deployable assets available to support during a flood against the scenarios in the National Risk Assessment, with a view to how the risk is likely to change and what might be needed in five or ten years' time. Following the National Flood Resilience Review in 2016, the government invested a further £12.5 million towards mobile flood defences. The government maintains a national Flood Asset Register of over 100 specialist flood rescue teams, and now has 500,000 sandbags, 25 miles of mobile flood barriers and 250 mobile pumps available at depots which are ready to be moved as needed.
17. In the Autumn Budget 2018, the government allocated an additional £13.1 million towards tackling risks from floods and climate change.
18. £5.4 million of this will fund the provision of a Flood Warning Service to communities at high risk of flooding. The Environment Agency's Flood Warning Service provides an alert system to the public, professional partners and the media across England, delivering warning messages to people at immediate risk of flooding. The flood warning service will be expanded to cover all communities in England at the highest risk of flooding from rivers and the sea (those with a 3.33% annual probability of flooding). The benefits of this, as damages avoided, will be approximately £36.8 million per annum.
19. £3 million will go towards boosting action to make homes and buildings more resilient to floods when they occur. This will include improved flood resilience techniques in buildings, purchasing frameworks with suppliers who have appropriate skills, and the encouraged application of the code-of-practice to show how flood resilience techniques can be embedded in the wider property market place.
20. Finally, £4.7 million is being directed towards action on surface water flood risk. There is ongoing work to improve flood risk assessment for surface water by better combining local and national information. This will include providing local detail for surface water flood maps and improving the speed of communicating storm forecasts to local responders. This work supports the implementation of the government's surface water management action plan, published in July 2018.
21. The government believes that a long term view of flood readiness and response is the best approach to the increasing risk, and there is already work underway to explore our approach to long-term future floods management. The government plans to publish a policy statement on flood and coastal erosion risk management in 2019, which will set out the government's policy and changes needed to rise to future challenges as part of the wider work on the 25 Year Environment Plan.

22. The government will seek to establish a specialist flood planning team consisting of a full-time flood incident management resource to provide expertise on flood planning. The Environment Agency are well trained in flood management and currently have 6,500 flood trained staff across England. The government recognises their capability and intends to form a specialist team who will be in a position to create partnerships and networks across local resilience forums, share best practice, assess flood plans and provide mapping and technical expertise. The team will be able to advise and direct on flood planning, and promote best practice. Creating a permanent focal point for flood planning in the form of the specialist team will allow a better strategic approach, provide oversight on all flood risks in an area and utilise resource and capability in the optimal way to mitigate flood risks.

## Capability and technology

23. The Emergency Planning College delivers training in emergency and crises management, and is recognised as a leading centre for multi-agency civil protection learning and development. The government recognises that there are other course providers that local resilience forums may choose instead, so it believes that the Cabinet Office, rather than the Emergency Planning College, should remain the intellectual home for civil protection and resilience doctrine.
24. In his review General Cross thought that there was scope for improvement in the way the Emergency Planning College is currently run, such as affordability and geographical accessibility of the training, as well shifting focus back to domestic needs. The Emergency Planning College is able to offer training delivered by experienced industry-leading experts, so the government is keen to see it work closely with organisations of all sizes to meet their needs. The government will continue to collaborate with the Emergency Planning College and other professional institutions and networks to help local resilience forums access high quality, needs-specific training for multi-agency flood planning, response and recovery.
25. The government is in agreement with the recommendation that there are clear benefits to implementing national and local training programmes for local resilience forums. The government spent £1 million on the last national exercise 'Watermark' which took place in 2011. The government will determine the timing and frequency of national (tier 1) exercises when decisions are made about our strategic approach to future flood incident management in 2019, with a preference for holding a national (tier 1) exercise once every 5 years. A training needs analysis, including for tactical advisors, will be considered as part of this.
26. The government fully supports the recommendation to continue to invest in forecasting technology, and as mentioned above has already made an investment of £5.4 million to increase flood warning coverage for an additional 62,000 properties and £4.7 million to improve surface water flooding preparedness and forecasting. The government recognises the need to take advantage of improving technological



capability and modelling. Whilst investment in river and coastal monitoring and modelling is undoubtedly beneficial, investment in surface water forecasting will be of continued focus over the next few years.

27. The government supports General Cross' view that local resilience forums should have a clear understanding of how to access nationally deployable assets, as well as better awareness of the technological capabilities available. It will seek to address this by providing clarity in the revised guidance.
28. ResilienceDirect has undergone a recent overhaul, and the government is in agreement with General Cross that the system can provide a valuable tool for resilience planning and response. The government has made a number of changes to improve its functionality and user experience. National response templates have successfully been built into ResilienceDirect, with the number of users growing rapidly at roughly 1000 per month. This growth enables users to submit real time information about an incident that can be accessed by all those involved in a response, feeding into Strategic and Tactical Co-ordination Group reports. These changes will support the work of the government, National Flood Response Centre operations, and all ResilienceDirect users including local resilience forums.
29. The government is committed to improving and investing in ResilienceDirect. This includes introducing more features such as mapping capabilities, with work on a new mapping interface already underway. The government has engaged with local resilience forums on many of these improvements, and the feedback included the desire to share guidance and communication across local resilience forums, using ResilienceDirect as a platform to enable this. This feature will be introduced by the Knowledge Hub, which allows users to access a library of information and share guidance and communications.

## **Roles, responsibilities and support**

30. The government welcomes the recommendation made by General Cross for clarification to be provided on the duties and responsibilities of local resilience forum partners involved in flood emergency planning and response. As with most emergencies, a wide range of organisations need to be involved, fulfilling their respective duties with the right level of expertise and capability. The government believes that the current framework is suitable for the range of risks that the country faces, and importantly, it supports flexibility to meet the diverse range of local response needs. Roles and duties need to be outlined in the Multi-Agency Flood Plan and all partners should agree to them. Support for this will be provided in the revised guidance.
31. The government believes it is important that the individual roles and responsibilities of the organisations that constitute local resilience forums are clear about expectations and their statutory duties. The Flood and Water Management Act 2010 sets out roles

for flood risk management and the Civil Contingencies Act 2004 sets out the legislative requirements of Category 1 and 2 responders, to make sure that these organisations work together to plan and prepare for a range of emergencies. The government believes that ownership of responsibility on a local level helps encourage organisations to invest in local preparedness. The roles and responsibilities of the local resilience forum will be clearly set out in the government flood emergency standard.

32. The government will not be introducing statutory duties for the fire and rescue service in relation to flood risk management. The fire and rescue service already have discretionary powers to respond to certain local incidents including major flooding under their general powers in the Fire and Rescue Services Act 2004. Depending on the particular flooding circumstance, multiple agencies may be involved in flood rescue, and it remains down to local choice as to who is needed at the time.
33. The government supports the work being taken forward to create risk-based local resilience forum groupings, where more than one local resilience forum shares a common risk from a geographical feature, such as flooding from a river. It recognises the practical benefits of the collaborative approach being taken in groupings such as the Trent Group and East Coast Group. By creating risk based groupings where there is clear evidence for their need, the government believes that positive steps can be taken towards overcoming any boundary issues that may exist, and allows pooling of resource and capability in emergency flooding situations. Work has already commenced on the creation of a South West Group, to be followed by a North West Group. The government supports these initiatives, and others that may arise in the future.
34. In the review, General Cross looked at the ways in which different sources of flooding are treated in an emergency situation, including river, coastal, surface water and ground water. He suggested that since the changes made by the Flood and Water Management Act 2010, there has been a lack of clarity among local resilience forums as to who is responsible for surface water, and whether the duty rests with the Lead Local Flood Authorities or with the Environment Agency.
35. Under the Civil Contingencies Act 2004, the Environment Agency is defined as a Category 1 emergency responder. All Category 1 responders including the Environment Agency, Lead Local Flood Authorities, fire and rescue service and police, have a duty to assess, plan and advise in respect of emergencies that may occur.
36. The Environment Agency is not expected to respond to flooding from surface water sources, unless the flooding impacts their assets or obstructs performance of their statutory functions. However, along with all public authorities, it has power, not a duty, to respond to many types of flooding incidents, subject to resource availability and providing that its statutory responsibilities are met.

37. The Environment Agency is highly capable when it comes to flood response. It has an extensive range of newly upgraded equipment for emergency flood response, which it exercises and deploys in coastal and river flooding incidents. This includes 25 miles of mobile, temporary flood barriers, 250 high volume pumps compatible with 93 miles of fire service hoses and 7 incident response vehicles. It has 6,500 staff trained to respond to incidents and regularly exercises with the military to ensure that their support can be drawn on when required.
38. In addition, under the Environment Act 1995, the Environment Agency has a 'general supervisory function' for flood preparedness, which relates to its role to prepare strategic documents such as the National and Local Flooding and Coastal Risk Management Strategies and Flood Risk Plans, co-ordinate activity of other Risk Management Authorities, issue flood warnings, comment on development control decisions, give advice, provide training and conduct research.
39. As a result, the Environment Agency is in a good position to respond to flooding during a large scale surface water flooding incident. This does not take any responsibility away from Lead Local Flood Authorities, who remain responsible for surface and ground water flood risk planning and prevention.
40. Therefore, the government has no plans to change the current legal framework of responsibilities in connection with flooding from different sources. It recognises however, that the Environment Agency is often in a good position to respond to surface water flooding incidents and supports its willingness to do so as part of a collaborative and nuanced local resilience forum approach.
41. General Cross highlighted the support that the Military provide in major flooding events, and the government will continue to call on the Military in cases of extreme flooding emergencies. The Ministry of Defence's network of resilience liaison officers are called upon in major flood emergencies to help with civil emergencies, including flooding, as needed. The government recognises the importance of this network and will continue to ensure that that Liaison Officer posts are filled with suitably qualified and experienced personnel.

## Community resilience

42. The review emphasised the power of community resilience in the face of emergency incidents such as flooding. The government values and supports co-ordinated local response from communities and volunteers, and encourages local resilience forums to take an organisational, leadership role in such events.
43. The twelve Regional Flood and Coastal Committees across England play an important role in engaging with the voluntary sector and bringing together local and national decision makers, with members including Lead Local Flood Authorities. The Flood and Water Management Act 2010 allows the Environment Agency to issues

levies, which are paid by the Lead Local Flood Authorities, as a contribution to flood and coastal risk management. The levy is subject to approval by the appropriate Regional Flood and Coastal Committees, which comprises local authority representatives.

44. General Cross recommended that Regional Flood and Coastal Committees should be encouraged to direct funds and grants towards local community resilience initiatives. Regional Flood and Coastal Committees already can and do use the local levy to fund these initiatives, and the government will continue to empower them to take the right decisions and address any barriers. Regional Flood and Coastal Committees have a key role in balancing local priorities and making sure that investment optimises value for money and benefits for local communities. The government will continue to engage with Regional Flood and Coastal Committees chairs to identify further opportunities.
45. The government will seek to further strengthen ties with the voluntary sector and is actively engaged with work being led by the Charity Commission to better coordinate charitable giving and fund distribution. This work includes the establishment of a National Emergencies Trust, comparable to international Disaster Emergency Committee arrangements.
46. The government agrees with the recommendation that a nationally consistent approach is needed to enable local areas to work with organisational partners to tailor the support they need against the capability and capacity available in their area. The government co-ordinates the Communities Prepared National Group, which supports the development and local implementation of community resilience policy across England. It provides a forum for local managers and government to share good practice and lessons learned in community engagement and capability building across the country. The group advises the government on policy and projects relating to community resilience, and identifies opportunities for co-ordination of community resilience related work. This is outlined in The National Adaptation Programme<sup>2</sup>.
47. The Communities Prepared National Group aims to increase the number of strategies for community resilience at local resilience forum level, and enable greater coordination and collaboration amongst practitioners across the country. It is currently refreshing its framework to enhance this. The government encourages consistency of flood risk management to be integrated with the full range of community resilience risks in the National Risk Register. National Level Assessments, which provides comprehensive detail on potential scenarios over the next five years and their consequences, are available to local resilience forums and can promote consistency of understanding and approach to all risks.

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/727252/national-adaptation-programme-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf)

# Summary of recommendations in the review

**Note: Recommendations start at 7 in the review as General Cross dedicated 1-6 to introductions and general observations.**

## 7. Written flood plans

A new Cabinet Office 'standard' should be introduced for flood response planning – and be used as a part of the (below) assurance process; and all Multi-Agency Flood Plans should address and cover the same basic principles of flood planning, as set out in revised Defra guidance.

## 8. Assurance of flood plans

An agreed system of internal and external Multi-Agency Flood Plan assurance needs to be established across the country.

## 9. Composition of Local Resilience Forums and funding challenges

Whilst the boundary issues are not easily resolved, the aim over time must surely be to make them more coherent. In the meantime, consideration should be given to implementing a national 3 to 6 year funding formula, based on 'core requirements', the flood (and other) risks and/or the population served by an local resilience forum's area.

The formation of flood-specific, multi-local resilience forums 'risk-based' groupings, covering all local resilience forums in England, should be encouraged.

## 10. Training and exercising

The Emergency Planning College should become the intellectual home for flood response planning doctrine, and act as the centre for the development of resilience doctrine in the round, including floods. It should re-focus back onto the needs of the local resilience forums, and develop affordable and accredited training programmes for local responders.

There should be a clearly laid out and publicised annual programme of flood exercises across England (indeed the UK) and a review of how national Tier 1 exercises are conducted once local resilience forums have had time to amend their Multi-Agency Flood Plans in the light of the new guidance and new Catchment Groups have been established.

A training-needs analysis of the Fire and Rescue Service delivered Flood Tactical Adviser training on behalf of Defra should be conducted in order to formalise funding.

## **11. National funding and resource**

The balance between the funding of defences as opposed to that available to prepare for and respond to actual floods should be critically examined to allow for greater flexibility and an increase in the amount of resource dedicated to local resilience forum flood preparedness, bolstering preparedness to respond to large-scale flooding that could easily overwhelm local capability.

## **12. National flood response capability**

The government should continue to invest in flood forecasting and warning capabilities and in rapidly deployable national assets – including those held on the National Asset register established by the Fire and Rescue Services. Local resilience forums need to have a better understanding on how to access these assets.

## **13. The Environment Agency**

The current role of the Environment Agency should be expanded to give it greater reach and enable it to provide additional direct support to local resilience forums. It should also be allowed greater flexibility on balancing spending between flood defences and flood emergency planning and response.

## **14. Military**

The network of Royal Navy, Army and Royal Air Force Liaison Officers should be strongly supported and strengthened wherever possible.

## **15. Legislation, guidance and accountability**

Greater clarity is required on the issues of who is ultimately accountable on resilience issues and outcomes.

Along with the updated Multi-Agency Flood Plan guidance being produced as a part of this review, a wider review of documentation and guidance and, where possible, consolidation would help to reduce the load on local resilience forums.

## **16. ResilienceDirect and emerging technologies**

To become the backbone of national resilience – providing a single, coherent ‘golden thread’ picture running from local level (the ‘teeth’) up to COBR (the ‘tail’) – continuing investment in ResilienceDirect is needed. It should hold all the data and information that produces the intelligence and hence the knowledge that enables decisions to be taken at local, regional and national level – with appropriate backup capabilities.

## **17. Community resilience and the use of volunteers**

There should be a consistent national approach to building Level 1 personal and community resilience. Links with the voluntary and charitable sector need to be strengthened, with established national protocols and clarity on such issues as health and safety and insurance.

Regional Flood and Coastal Committees should be encouraged to direct funding/grants towards community initiatives to enable people and communities to become more resilient, and 'bounce back' quicker – with appropriate oversight and scrutiny of how funding/grants are distributed to avoid duplication of effort.

## **18. Surface water flooding**

Responsibility for emergency planning/response for surface and groundwater flooding should be brought into line with main river and coastal flooding which is currently the responsibility of the Environment Agency.