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Natural
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William Powell AM
Chair, Petitions Committee,
National Assembly for Wales,
Cardiff Bay,
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23 January 2015

Dear William,

RE: P 04-572 Grants for Flood Resilience

Thank you for your letter dated December 2014 on Petition P 04-572 calling for grants for properties that have recently flooded, to fund work to make them more resilient to future flooding.

You ask for our opinion on the petition and the correspondence. We would make the following points:

- The issue as to whether grants should be made available is a policy issue for Welsh Government and not for Natural Resources Wales.
- However, our view is that whilst a grant system may have attractions in providing assistance to householders, it has significant drawbacks that mean that very careful consideration would have to be given to operating such a system. These include: flood resistance or resilience measures are by no means appropriate or cost effective in all cases; the cost in administering and operating a grant scheme could use up a significant amount of the budget allocated; and there would be a need to ensure the grant is actually spent on appropriate measures.
- It is useful to make a distinction between flood resistance measures (usually temporary measures such as flood gates that can be installed when floods are expected), and flood resilience measure (which are usually more permanent measures to reduce the impact of flooding, such as hard floors or water resistant plaster). Often, the distinction between the two is blurred.
- In general, we would concur with the points made in the Minister's letter to you dated 1 September 2014, that property level protection measures are not always the most appropriate or effective option, in terms of cost and in terms of applicability. For example, an Environment Agency study of the effectiveness of such measures included the comment that "the high cost of resilience measures makes these largely cost ineffective as a means of Government intervention, unless flooding of a property is extremely frequent, at greater than a 20% annual exceedance probability (1 in 5 years)." This means, in general, that such measures are not

appropriate for low frequency and high depth flooding, such as flood from the sea and from main rivers, which is NRW's remit. It may be more appropriate for frequent low depth flooding, usually associated with surface water or local watercourse flooding, which in general is the remit of Local Authorities.

- There are also issues around the practical use of flood resistance measures in a flood. For example, flood gates will not be used very frequently – will they still be serviceable and accessible when they are needed? Will the householder know how and when to install them? Or what happens if the householder is not in when flooding occurs? Such measures can sometimes give a false sense of security or even actually increase the danger (by effectively trapping people inside their homes, for example).
- However, as stated in the Minister's letter to you, NRW does provide flood resistance measures such as flood gates, where we are of the opinion it is the best option for a community as a whole. We do not provide them for individual houses on demand, as our view is that this is not consistent with our community-based approach to flood alleviation. We would also concur with the point in the Minister's letter that better value for money is achieved through community schemes.
- Flood resistance and resilience measures can play a role though, and we do direct householders, for example through our Flood Awareness Wales work and through our website, to information sources on what products are available privately should anyone wish to take their own action.
- We would agree that installing flood resilience measures in a property prone to flooding is, in general, a sensible idea, including doing so when repairing a flooded property. We would encourage this.
- We would also agree with the point that it would be desirable for insurance companies to take flood resistance and resilience measures into account when arriving at premiums, and we have lobbied for this. However, this is primarily a matter for Government and the insurance industry.
- Our information on flood risk is made available to the insurance industry, but it is our understanding that they also use their own information in calculating premiums.

We would also make some clarifications on specific issues raised in Mr Moore's correspondence that you have attached to your letter:

- 1st paragraph: Mr Moore refers to 'NRW correspondence', but it appears that the correspondence he is referring to is the Minister's letter of 1 September 2014, and not from NRW.
- 3rd paragraph: Mr Moore is talking about surface water flooding, and the statement that "the amount of rain which caused homes to nearly flood was a 1 in 6 year event and I believe this figure falls within the NRW remit to supply individual flood protection" is not correct: this was surface water flooding which is not NRW's remit, and we do not have (and we not aware that any other flood risk management authority in Wales has) such a criteria on frequency of flooding and eligibility for individual flood protection.
- 7th paragraph: Mr Moore is again referring to the Minister's letter when he says that 'NRW seems to be contradicting itself on the figures they present'. We are not presenting these figures - our experience of providing flood resistance products on a community basis has been that the average cost per household is around £1,200-£1,400 per property. If the cost of flood resilience measures were also included then the costs would naturally be higher.

I hope that these comments are helpful to the Committee; if there are any further questions, please do contact me.

Yours sincerely,

A handwritten signature in black ink that reads "Emyr Roberts". The signature is written in a cursive style with a large, stylized 'R'.

Emyr Roberts

**Prif Weithredwr
Chief Executive**