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Mr Dan Rogerson  
Parliamentary Under Secretary of State  
Department for Environment, Food & Rural Affairs  
Nobel House  
17 Smith Square  
London SW1P 3JR

27 March 2014

Dear Minister

**Tackling flooding in the South East**

We write on behalf of South East England Councils (SEEC) and South East Strategic Leaders (SESL). Together we promote the views and interests of all tiers of local government across the South East, representing more than nine million residents.

We are pleased that you will be meeting with our members on 9 April to hear about the impact of recent flooding on the South East. With the biggest population in England, the highest housing growth and the greatest economic returns to the Treasury, the human and economic cost of flooding in the South East is significant. In light of our experiences we would welcome your support on four key issues outlined in this letter. We look forward to discussing these in more detail on the 9<sup>th</sup>:

- 1) Ensuring sufficient funding for immediate repair and response work**
- 2) Investing today to reduce the cost of future flood emergencies**
- 3) Ensuring effective and efficient council-led multi-agency action**
- 4) Taking forward Sustainable Drainage Systems (SuDS).**

**1) Ensuring sufficient funding for immediate repair and response work**

Councils have been instrumental in leading action with partners to address the impact of recent flooding affecting large parts of the South East. Although the Thames Valley and Hambledon in Hampshire hit the headlines, flooding has also affected many other communities and businesses. Key routes such as the A32 in Hampshire and A22 in Surrey were still shut due to flooding in early March. Similarly, ongoing efforts have been necessary to keep key water treatment works operating, such as Kenley in Surrey serving 50,000 homes.

We welcome Government's recognition of the need to make additional funding available to councils, as reflected most recently in the Chancellor's Budget statement. It will be important to make sure that emergency capital funding for roads and repairs is sufficient to cover councils' costs as the full extent of the damage comes to light. We already have evidence in the South East that immediate costs are significant. Surrey County Council estimates the additional highways repairs will be at least £25m and Hampshire County Council estimates repairs will be up to £36m. Some member councils have seen a trebling of defect reporting over the last three months. Without sufficient additional funding, meeting these costs and others associated with damage caused by the prolonged intense rainfall may well delay, or even halt, priority investment projects.

**2) Investing today to reduce the cost of future flood emergencies**

In addition to emergency funding, longer-term capital investment is needed to alleviate future flooding in the South East. A robust, long-term investment programme is not only necessary to address an increasingly costly investment gap but to make critical infrastructure more resilient to extreme weather, reducing the cost of future repair and recovery operations.

Local authorities should not be required to fund major flood schemes, such as the River Thames scheme within the Lower Thames Flood Risk Management Strategy. Councils do not have the multiple millions of pounds required to fund such schemes, which are of vital importance and need Treasury backing to proceed. This has also been the subject of individual council leaders' correspondence to the Prime Minister and Chancellor of the Exchequer.

Furthermore, whilst we welcome the Government's move towards a longer-term six-year programme for Flood Defence Grant in Aid (FDGiA) we are concerned that the timescales for Local Lead Flood Authorities to submit their medium term plans to the Environment Agency have been insufficient to ensure that local needs, identified by recent events, inform future flood risk management. Requiring councils to develop robust forward work programmes during the months of February and March – during which time many councils have been focused on leading local flood response work – has put authorities under significant pressure. Councils need more time to develop detailed proposals to ensure that the lessons learned from the many flood investigations underway inform funding bids. We seek your assurance that the programme will remain open so that authorities have the opportunity to submit bids for schemes based on local knowledge and evidence from this year's, and potentially subsequent years', flooding. It is also important that grant aid formula is more outcomes-focused and responsive to flood-type variations.

### **3) Ensuring effective and efficient council-led multi-agency action**

Councils across the South East have been leading effective local action to deal with the impacts of recent flooding. Our experiences highlight key areas which could further improve the effectiveness and efficiency of the multi-agency approach and where we would welcome your support. For example:

- We urge Government to do all it can to ensure the Environment Agency works effectively with local partners, particularly in terms of sharing intelligence and utilising mapping tools. Not only will this make efficient use of limited resources, it will also help us better understand and manage the risk of ground water flooding which affects large parts of the South East. The last three months highlighted the devastating and long-lasting impacts of ground water flooding, particularly when this combines with fluvial and/or surface water flooding.
- Members have reported difficulties where their local water company disputed its responsibility to clear up after sewage has surcharged. We would welcome Government support to ensure water companies fulfil their obligations both in terms of response, recovery and on-going flood risk management.

### **4) Taking forward Sustainable Drainage Systems (SuDS)**

Whilst many of our flooding issues go well beyond the scope of Sustainable Drainage Systems (SuDS) alone, we recognise that they can still play an important role in managing drainage in new urban developments. Clarity on the way forward for SuDS is needed for all involved and we would be grateful for an update on your consultation and implementation timetable. Whilst district and county councils in the South East are committed to working closely together, we trust the Government will take into consideration the extra factors to consider when implementing SuDS legislation in two-tier areas, particularly in relation to the planning process and potential billing and delivery responsibilities. Furthermore, in view of the growing concern about how SuDS will be taken forward, we urge the Government to give further careful consideration to two key issues:

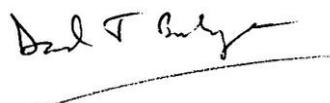
- How it will ensure lead local flood authorities have the necessary resources to approve, adopt and fund the on-going maintenance costs of SuDS?
- How charges for SuDS, including administration costs, will be applied and recovered?

We look forward to your response. We are also sending a copy to Brandon Lewis at DCLG.

Yours sincerely



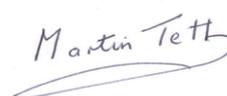
**Cllr Gordon Keymer CBE**  
Chairman, South East England Councils



**Cllr David Burbage MBE**  
Chairman, South East Strategic Leaders



**Cllr David Hodge**  
Deputy Chairman, South East England Councils



**Cllr Martin Tett**  
Vice Chairman, South East Strategic Leaders