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Summary of responses to the consultation on policy options for promoting property- level flood protection and resilience 30th July to 31st October 2008

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Introduction

The 2007 summer floods illustrated the distress and damage that flooding can cause. Not only do householders lose possessions and suffer damage to their properties when there is a flood, often they are also forced to endure the disruption and emotional distress caused by being unable to return to their homes for several months after the event. Household floods cause an average of around £30,000¹ damage per property and can lead to both physical and mental ill-health. The Environment Agency estimates that at present around 400,000 homes and 75,000 businesses in England are located in areas where there is a significant annual chance of river or coastal flooding². Further homes are at risk of surface water or sewer flooding.

Defra issued a consultation on 30 July 2008 setting out options on ways to increase the use of property-level measures to reduce the impacts of flooding for those homes facing the highest risk of flooding. The promotion of property-level measures is supported by Sir Michael Pitt's review on lessons learned from the 2007 floods, which recommends that Government encourages further promotion of flood protection and resilience measures, both for new buildings and for existing properties in flood risk areas. The consultation built on Defra's pilot grant scheme and set out two policy options:

(1) offering free home flood surveys for households in at-risk communities;

(2) offering free home flood surveys and a grant to subsidise the costs of flood protection measures

The consultation raised a series of questions for stakeholders to consider based around these two options (Annex 2). The consultation closed on 31 October 2008.

As part of the consultation Defra held four stakeholder workshops between the 15 and 24 October 2008. This brought together over 200 key stakeholders. Defra subsequently received 57 substantive written responses to this consultation, as shown in Annex 1.

Except where respondents asked for all or part of their response to remain confidential, Defra's Information Resource Centre will supply copies of the consultation responses to personal callers or in response to telephone or e-mail requests (020 7238 6575 or e-mail defra.library@defra.gsi.gov.uk). Wherever possible, personal callers should give the library 24 hours notice of their

¹ Risk & Policy Analysts Ltd, Flood Hazard Research Centre, EFTEC & CASPAR (2004) The appraisal of human-related intangible impacts of flooding. Defra.

² Environment Agency (2006) National Flood Risk Assessment.

requirements. An administrative charge will be made to cover photocopying and postage costs.

This paper summarises the responses received, categorised by respondent as shown in Annex 1. The focus of the summary is on comments received to individual questions but where possible we have sought to capture the more general points made. The paper is structured as follows:

- Part 1 Key messages from consultation and workshop
- Part 2 Responses to the individual questions
- Annex 1 List of respondents to the consultation
- Annex 2 List of questions raised in the consultation document

Next Steps

Information on how property-level flood protection and resilience proposals will be taken forward will be available on the Defra website:

<http://www.defra.gov.uk/environ/fcd/adaptationandresilience/default.htm>

Part 1 – Key Messages from Consultation

Consultation overview

It was clear from the consultation that household level flood resilience and protection measures can help reduce damage, disruption and negative impacts on health. They provide a more effective alternative to the use of sandbags and can significantly reduce recovery time and clean-up costs, making it easier and quicker for people to move back into their homes.

Less than 30% of people whose households have been flooded take any steps to make their homes more resilient to floods or to reduce water entry and so, in support of the recommendations in the Pitt Review, the consultees agreed that improving the uptake of household flood level flood resilience and protection measures was vitally important. It was also recognised at the workshops that public perception of resilience measures is usually unfavourable due to potential inconvenience, stigma and impact on property values.

It was agreed by the majority of the respondents, and the attendees at the grant scheme workshops, that Government needs to provide more information to households and improve awareness in areas at a high risk of flooding. It was also felt that information needs to be provided to the public on the impacts of flooding and the flood protection and resilience products that are available to allow households to make informed decisions on how they can protect their properties. It was also noted by many of the respondents that the majority of homeowners lack the expertise and finances to effectively protect themselves. It is therefore imperative that Government provides advice and assistance.

The majority of respondents thought that the estimated costs detailed in the consultation were reasonable, although this was dependent on there being sufficient supply of products and expertise.

Increasing take-up for property-level flood protection and resilience

There was no clear consensus on whether the government grant scheme should focus on just households or businesses and households. There was however, strong indication that in the first instance, it was important to concentrate on households. Following the initial funding rounds of the scheme, it was thought that it may be possible to start looking at protecting small businesses.

Generally, it was felt that the provision of free household flood risk surveys would, to a limited extent, increase the take-up of property level resilience and protection measures. However, the majority of respondents felt that to gain the full benefits of the survey it was important to incentivise the actual implementation of the resilience and protection measures. It was recognised that

installing flood protection measures would be a considerable burden on households and without such a grant, many of the recommendations from the survey would not be acted upon. Thus the majority of respondents felt that the best way of encouraging take up of the measures would be to subsidise them for households in a smaller number of communities.

All respondents believed that the use of public funds to subsidise the costs of flood protection and resilience for individual properties, rather than just paying for free home surveys was appropriate. Respondents made it clear that this funding should not be at the expense of existing flood defence funds. It was less clear whether the scheme should look to reach a greater number of properties, offering partial subsidies or whether it should be used for full flood protection subsidies, which would assist less households but would have the guarantee that those properties included would be fully protected.

All respondents, both in the workshops and to the consultation, believed that the grant should be offered to all appropriate at risk properties, and not just concentrate on low-income households. There was no agreement for exploring a means testing system.

It was agreed that a cap of £4,500 was reasonable to cover almost all basic protection for the majority of households. Respondents believed that using this cap level would allow a reasonable number of high risk properties to receive full protection.

The majority of respondents believed that the scheme should be nationally consistent to promote fairness and equality across the country. However, it was also considered to be important to ensure local authorities play a lead role in the management of the scheme to promote local flexibility, utilising local knowledge and expertise.

Further issues, including encouraging resilient repair and refurbishment

It is clear from the consultation and the outcome of the workshops that a range of professional groups that would be appropriate to conduct household risk surveys. Organisations such as the Royal Institution of Chartered Surveyors would be appropriate for carrying out the surveys. However, it is important that other capable independent organisations are not overlooked.

There was no clear consensus about whether all protection and resilience measures should require the BSI Kitemark. It is clear however, that quality assurance of products is essential, whether that is the BSI Kitemark or an equivalent certificate. It was recognised that a barrier to innovation in flood protection products was the cost of gaining such a certificate, and many

respondents believed that to improve competition and availability of such products, it was important to reduce these costs.

A clear message from the consultation was that in the event of a major flood, there would be insufficient supply of skills and materials to enable resilient and resistant repairs to be carried out. It was felt that the experience from the Summer2007 floods showed how the problem of having an insufficient supply of skills and materials causes bottlenecks in the supply system, which causes significant delays to repair work being carried out. It is thought that to avoid such issues arising, it is vital to encourage the uptake of protection and resilience measures now, and not wait for such an emergency.

The majority of respondents felt that an independent quality-assurance standard would help to encourage resilient repair, providing confidence for householders in products and the standard of works.

Workshops

Delegates believed that household level flood resilience measures could provide a useful contribution to managing flood risk given some of the difficulties and limitations of implementing flood protection measures, particularly at a community level. However, it was recognised that public perception of resilience measures is usually unfavourable due to potential inconvenience, stigma and impact on property values. It was also suggested that a lack of knowledge about flood resilience and protection measures may hinder uptake but it was thought that this would be relatively easy to overcome.

The uptake of household level flood resilience and protection measures could also be encouraged by raising awareness and sharing knowledge by facilitating dissemination of knowledge and capacity building amongst relevant professionals. The importance of engagement with communities via meetings, newsletters etc was also highlighted and it was suggested that local authorities and the Environment Agency play a key role in this process.

The role of financial incentives and approaches to stimulate innovation and uptake of measures was also discussed. There was broad consensus that more was required to open up the market for new flood resilience and protection measures by making the accreditation process for products easier and more affordable.

In terms of policy options, there was overwhelming support for Option 2, in which government would provide grants to subsidise the costs of resilience and protection measures. It was suggested that grants would facilitate greater uptake of measures, provide a greater level of consistency and allow local flexibility. There was clear preference (70% of delegates) for the scheme to be based on flood risk rather than means testing ability to pay for measures.

When asked about capping subsidies for individual households, many of the delegates suggested that more information might be required. However, in the interim there was agreement that the subsidy level of £5,000 used in the pilot studies was a reasonable value, £500 more than suggested in the consultation document.

For more information, the full report from the workshops can be found at <http://www.defra.gov.uk/enviro/fcd/adaptationandresilience/propertyresilience.htm>

Part 2 – Responses to the Individual Questions

Consultation Overview

Q1 Do you think that the costs and benefits for the measures outlined here and in the Impact Assessment (Annex C) are reasonable estimates? Do you have further information to help refine the estimates?

Operating authorities including local authorities and the Environment Agency

The majority of respondents thought the estimated costs for the measures outlined were reasonable, however a number of respondents did not feel they had the expertise in this area to comment. One authority thought they were reasonable estimates assuming that there is sufficient availability of expertise to carry out studies, suitable materials to undertake work and sufficient expert builders to undertake work. Shortfalls in any of these areas would increase costs on a supply and demand basis.

Insurers

Insurers agreed that the estimated costs and benefits seemed reasonable but did not have any further information to help refine the figures.

Providers of flood protection measures, products and surveys

There was no consistent view amongst providers of flood protection measures with some viewing the costs as overestimated, whilst others felt they were underestimated.

Individuals and community groups

Generally, respondents believed the costs estimated to be reasonable.

Professional associations, institutions and academics

Comments from associations, institutions and academics were mixed. Responses varied from those that felt the costs were reasonable but felt there was scope for further research based on experience gained from the 2007 floods, to others that felt the costs had been underestimated and had concerns that it would result in the delivery of compromised projects. A number of the respondents also felt that the costs and benefits outlined did not take into account the disruption experienced by property owners during the flood recovery process. They argued that non-economic factors should be taken into consideration when deciding which properties to target.

Q2 Do you think that the Government needs to give more information to high-risk properties and help them do more to protect themselves? Alternatively, do you think that the level of property-level flood protection and resilience should be left to market forces and individual choice?

Operating authorities including local authorities and the Environment Agency

Almost all operating authorities agreed that Government needs to provide more information to households and improve awareness in areas at a high-risk of flooding. Information needs to be provided to the public on the impacts of flooding and the flood protection and resilience products that are available to allow households to make informed decisions on how they can protect their properties. Many of the respondents noted that the majority of homeowners lack the expertise and finances to effectively protect themselves so Government needs to provide advice and assistance.

The majority of respondents thought that market forces and individual choice should not feature in property-level flood protection as there would be a risk that some householders would continue to take no action.

Insurers

All respondents believed the Government should provide more information to households at risk on the costs and benefits of flood protection so they are then in a better position to make a more informed decision. It was agreed by most respondents that property-level flood protection should be left to market forces and individual choice.

Providers of flood protection measures, products and surveys

Providers of flood protection measures and products agreed that Government needs to provide more information and assistance to households in high risk areas. One respondent suggested that information should be provided nationally, not just targeted to those in high-risk areas.

Respondents also agreed that if property-level flood protection was left to market forces then the current take-up of flood protection measures would not improve.

Individuals and community groups

The majority of respondents from this group believed that Government has not done enough to protect high-risk properties in the past, and that unbiased

information on levels of risk, options for protection, and costs of suitable products and measures needs to be provided.

Respondents agreed that property-level flood protection should not be left to market forces, with one individual suggesting that there should be a minimum level of protection specified which is related to the perceived risk in a particular area.

Professional associations, institutions and academics

Generally, professional associations agreed that more information and assistance needs to be provided by Government to owners of properties at high risk of flooding. One group said that current data on flood risk to individual properties is not generally available and where it is the majority of owners would not be able to understand the level of risk. It was also recommended that Government should continue to recognise the need to provide sufficient funding for both community-level flood defences and household level flood resilience measures.

It was widely agreed that relying on market forces would not be the most adequate way to encourage take up of flood protection measures.

Increasing take-up of property-level flood protection and resilience

Q3 If a government grant scheme were to be introduced, do you agree that it should initially focus on households rather than businesses?

Operating authorities including local authorities and the Environment Agency

The majority of operating authorities wanted to see the government grant scheme focus on households in the first instance. However a number of authorities thought that small businesses should be considered in some way as well because some businesses are an integral part of communities. It was suggested this could be done by offering them the free survey but not the subsidy.

Insurers

Most respondents in this group agreed that the government grant scheme should be offered to both at-risk households and small businesses.

One insurer emphasised the importance of ensuring small businesses understand their flood risk and the benefits of flood risk management, insurance and resilience measures.

Providers of flood protection measures, products and surveys

There was no consistent view amongst providers of flood protection measures and products. A number agreed that the government grant scheme should focus initially on households whilst others felt businesses should also be considered. It was suggested that there should be help available to businesses based on the severity of flood risk, benefits/costs of measures, ability to pay and key business indicators such as jobs and benefit to the local economy. However, it was also thought that businesses would be more able to generate funds for a survey and resistance and resilience measures than households would.

Individuals and community groups

There was strong support amongst individuals and community groups for the government grant scheme to initially focus on households.

Professional associations, institutions and academics

The majority of professional associations, institutions and academics believed the grant scheme should be offered to households only, as businesses should be carrying out work related to flood risk as a normal part of their business continuity planning. One respondent thought the grant scheme should focus on both households and businesses whilst one suggested considering the inclusion of businesses if they are an integral part of a community (e.g. corner shop).

A further viewpoint suggested that grants should be allocated in proportion to risk and the savings that could be achieved, rather than based on an arbitrary distinction between households and businesses.

Q4 Do you think that a free home survey scheme would be an effective way to drive increased take-up of property-level flood protection and resilience? What else could be done to encourage greater voluntary take-up of such measures?

Operating authorities including local authorities and the Environment Agency

Generally, operating authorities agreed that a free home survey scheme would be an effective way to increase take-up of property-level flood protection and resilience, but only if put together with a grant scheme. It was thought that a free

home survey on its own would not change householder flood risk unless action is subsequently taken to implement the recommendations in the survey.

A further respondent thought the free home survey would give homeowners the confidence and understanding of what types of flood resilience or proofing measures would be appropriate for their property considering the degree of flood risk presented. However, most authorities agreed that installing flood protection measures was a considerable cost to households and a subsidy scheme would further increase take-up. There were also thoughts that a free survey would only create concern for people once they were made aware of their level of risk.

Insurers

Generally, insurers agreed that a free home survey would increase the take-up of flood protection measures. One insurance group suggested that following on from the implementation of a free home survey scheme, insurers may then be able to advise property owners of the impact on insurance for each option open to them, which in itself, may encourage the property owners to take action. It was also suggested that a preferred supplier list of flood resilient/resistant measures be produced and made available to the public and the survey report be consumer friendly.

Providers of flood protection measures, products and surveys

Most providers of flood protection measures felt that a free home survey would not be an effective way to increase take-up of flood protection measures. It was suggested that there is very little that can be done to voluntarily increase the take up of property level flood protection, until the homeowner understands the cost benefit ratio to themselves of protecting their property. Measures suggested by providers that could help to increase the take up of protection and resilience measures included: providing, homeowners with information on what tried and tested products are available; offering a subsidy/grant to purchase the products/services; and insurance companies reducing premiums/excesses on policies where homeowners have carried out work.

Individuals and community groups

There was consensus that offering a free home survey alone to home owners would not increase take-up of flood protection measures. Many respondents believed that the information received from the survey would only increase worry and anxiety as cost would still be a major barrier for households.

Professional associations, institutions and academics

There was a general consensus from this group that introducing a free home survey scheme would not increase take-up of flood resilience and protection

measures. Some believed that individual property owners would assess the risk of flooding against the cost of the measures being recommended and most would accept the risk. Others thought consumers might not act on the recommendations of the home surveys to improve the flood resistance of their property due to either a lack of resources or a lack of faith in the technologies on offer.

It was suggested by one association that financial incentives other than subsidies could increase take up of flood protective measures. For example, if any scheme could be linked together with a lowering of insurance company premiums, that might incentivise the public to take up any recommendations following a survey.

Q5 Is it reasonable to expect people living in high-risk areas to pay much or all of the cost of protecting their homes from flood damage? What viable options exist for supporting lower-income households?

Operating authorities including local authorities and the Environment Agency

Some authorities thought it was reasonable to expect people living in high-risk areas to pay much or all of the cost associated with protecting their homes, but only if they could afford to. It was also thought by some that this was dependant on individual circumstances. For example property owners might choose to live in a particular location whereas some tenants might not have been given the choice. It was suggested that level of flood risk was reflected in housing prices resulting in lower income families living in high risk areas.

It was also thought that mitigating intermittent and infrequent risks will not be a high priority for lower income families, and the implementation of flood protection would remain low if it had to be self funded. It was suggested that financial and practical support was required, including risk assessments, help with information on options, suitable contractors and help with funding.

Insurers

Most insurers thought it was reasonable to expect homeowners to pay for flood protection measures, especially if they were living in a high risk area out of choice. However, it was thought that if the area had become high risk because of other developments, then homeowners, regardless of income, should not be held responsible.

All respondents suggested that lower income families living in high risk areas should be offered financial assistance from the government in the form of a grant/subsidy scheme to those most in need.

Providers of flood protection measures, products and surveys

The vast majority of respondents thought that it was unreasonable to expect households living in high-risk areas to pay for flood protection and resilience measures. There was some thought that all high risk areas should be treated the same, for example, where a particular area could not benefit from a capital scheme they should not necessarily be asked to pay for their own protection.

Options suggested for supporting low income households include: the council lending out flood protection / resilience units (the council keep a stock and then deploy to at risk households on flood warning); or the provision of subsidies/grants up to £1,000 increasing in to £2,000 for low income households who have been subject to means testing.

Individuals and community groups

The majority of individual and community groups believe that it is unreasonable to expect households living in high-risk flood areas to shoulder the cost of flood protection. It was felt that as other people living in high-risk areas benefited from capital flood defence schemes, it would be inequitable to expect other households to pay.

Respondents suggested that support for lower income households could be based on state benefits received.

Professional associations, institutions and academics

This group largely agreed that it was reasonable for households in high risk areas to pay some or all of the cost of flood protection. However, as one respondent stated, with the costs of flood protection remaining high, and the technology by no means thoroughly tested, homeowners should receive some government assistance through a mixture of grants, interest free loans, and subsidised products.

However, there was some who believed that whether one lives in an area of high risk was not dependant on income and it would be unfair that those living in high risk areas should have to pay for protection. It was thought that many homeowners were unaware of the flood risk at the time of purchase and therefore flood protection was an unexpected expense, not compensated for by lower property prices.

Q6 Is it appropriate to use public funds to subsidise the costs of flood protection or resilience for individual properties, rather than just paying for a free home survey?

Operating authorities including local authorities and the Environment Agency

Almost all respondents supported the use of public funds to subsidise the cost of flood protection or resilience measures for individual properties. It was agreed that since public funds were already used for community level protection schemes then it was reasonable to use the funds for property level protection as well.

Most respondents also agreed that public funding would be important in increasing interest and take-up in flood protection solutions.

Insurers

There was general agreement that using public funds to subsidise the costs of flood protection for individual properties was appropriate.

It was suggested that this should not be at the expense of existing flood defence funds and some felt that public funds should be made available for dealing with the causes of flooding rather than the effects on individual properties.

Providers of flood protection measures, products and surveys

The majority of respondents from this group agreed that it was appropriate to use public funds to support flood protection measures in individual properties. It was noted that property- based flood protection schemes can often be a lot more cost effective than a permanent solution. They were also faster to bring forth as they required less or no planning consent and did not disrupt the environment and natural habitat to the same extent.

It was suggested that if public funds were used to subsidise the cost of flood protection and resilience measures then it should be made available to as many properties as possible through a capped grant or means testing.

Individuals and community groups

There was considerable support for using public funds to subsidise the cost of flood protection and resilience measures. One individual felt that it would be unfair for individual homeowners to cover the full cost of protection or resilience to their property, while near neighbours enjoyed the benefits of community-level defences, to which they had made no direct contribution.

Professional associations, institutions and academics

Respondents from this group agreed that it was appropriate to use public funds although one group felt that this would only be appropriate provided it can be demonstrated that the investment is value for money by reducing the burden on Government.

Q7 Do you have suggestions on how we could ensure that any future grant scheme is simple to administer but also fair? Do you think that it would be a good idea to deliver the free surveys or the subsidises via teams who already deliver similar schemes, such as those responsible for private sector housing renewal?

Operating authorities including local authorities and the Environment Agency

There were a range of suggestions from authorities on how the subsidy scheme could be administered:

- (i) Schemes could be administered by the local authorities responsible for administering council tax.
- (ii) Local authorities would be well placed to administer the grant scheme given that they already undertook significant responsibilities in relation to housing renewal, flood risk management and had strong ties with their communities. It would be sensible to align flood resilience measures with existing housing renewal programmes.
- (iii) Environmental Health Officers typically had extensive housing experience both from their housing enforcement role and from their grant activities.
- (iv) Offering a single flat level part subsidy to all appropriate at risk property owners. It would be a good idea to offer free surveys or subsidies via the teams that already deliver similar schemes.
- (v) Administer the scheme through current systems that already appeared to be working locally.

Insurers

Respondents agreed that the simplest way to administer the grant scheme would be based entirely on the degree of risk facing an individual property rather than the income of the property owner. It would make sense to deliver any grants or other assistance via an existing system serving similar schemes in order to minimise costs.

Providers of flood protection measures, products and surveys

Providers of flood protection measures, products and surveys suggested a range of ways the scheme could be administered. These included:

- (i) The Regional Development Agency who already had people and processes in place to administer such grants for other schemes and this will fit well into their regeneration plans;
- (ii) Through local authorities in the same way as other existing schemes and be means tested;
- (iii) There has to be one unitary authority with responsibility for flooding and for building and maintaining flood defences. It is suggested that the Environment Agency is central budget holder.

Individuals and community groups

The majority of respondents felt that local authorities were best placed to deliver a grant scheme as they were already practiced in the delivery of schemes such as home insulation/ home improvement grants. It was felt that using the same teams who already delivered similar schemes would be appropriate, but with specialist help from the Environment Agency to look at the level of risk.

Professional associations, institutions and academics

Amongst professional associations, institutions and academics it was suggested that the scheme should be administered via local authorities who already administer grant schemes for home improvement and may be best placed to take on this role providing there was no increase in the financial burden on them. However, some also suggested that those already involved in housing renewal could be well placed to become involved.

Q8 Should any subsidy scheme offer full subsidies for a small number of high risk properties or partial subsidies for a larger number of properties? Is a £4,500 cap for the measures themselves (excluding survey) an appropriate level for the subsidy?

Operating authorities including local authorities and the Environment Agency

Operating authorities generally felt that the scheme should offer partial subsidies for a larger number of properties. The importance of the subsidy scheme having visible benefits was noted and it was suggested that there may be increased benefit and take-up if partial subsidies were offered initially, enabling a greater number of high risk properties to reduce their flood risk.

It was agreed by most respondents that a £4,500 cap for the measures per property seemed an appropriate amount. It was also suggested that the amount of subsidy could be linked to level of risk or be based on individual building types.

Insurers

Almost all respondents agreed that the subsidy scheme should be offered to a larger number of properties receiving partial financial support. The subsidy scheme should be offered to the largest possible number of households at risk, encouraging all beneficiaries to make a contribution towards their own defences.

It was mentioned that despite the benefits of offering full subsidies to a smaller number of properties, the scheme could then become open to public criticism, with those living in lower risk flood areas believing that the budget should be more evenly spread, and feeling that those living in high risk areas should shoulder some of the responsibility themselves.

The responses indicated that the £4,500 cap seemed reasonable to provide basic protection for the majority of households.

Providers of flood protection measures, products and surveys

Some providers felt that a partial subsidy should be offered to a larger number of at-risk properties whilst some thought the subsidy should be offered as a sliding scale. It was suggested that the amount of subsidy offered should be based on the costs and benefits and the ability of the householder to contribute to the cost of the protection measures.

Almost all respondents thought the cap of £4,500 was reasonable. It was also suggested that flood protection measures be excluded from VAT.

Individuals and community groups

The majority of respondents felt that a government grant scheme should offer full subsidies to a smaller number of properties. This could be based on level of vulnerability and/or level of income. A small number of respondents felt that the scheme should reach as many households as possible, whilst suggesting there should be a mechanism to allow larger grants in exceptional circumstances. There was limited support for the implementation of a sliding scale of subsidies relevant to the actual assessed risks, and amount of work required by each property.

All comments regarding the appropriateness of the £4,500 cap thought the figure was a reasonable amount to offer high-risk households.

Professional associations, institutions and academics

Reactions to this question were varied. Several respondents thought partial funding should be offered to a larger number of properties. It was also thought that this would increase awareness and demonstrate that the government is committed to the principle of property level protection. However, there was some concern that a partial subsidy could potentially be wasted as it would not be enough to install full protection measures. Further respondents suggested that a full subsidy should be offered to those most at risk whilst some thought subsidies should be allocated based on the size of the risk and the amount of potential savings.

Q9 Should the subsidy be offered to all appropriate at-risk properties or only low-income households or communities? Should the subsidy be available to all those on qualifying benefits or based on full means-testing?

Operating authorities including local authorities and the Environment Agency

There was considerable agreement amongst authorities that the subsidy should be offered to all appropriate at-risk properties. It was suggested that the scheme should be available to areas that do not benefit from flood defences that would protect against a flood that could take place once in every 100 years, and areas that also suffer from sewer and surface water flooding. Protecting those unlikely to be able to afford flood protection and those least likely to recover from a flood event should help prioritise the potential allocation or availability of flood protection grants.

The majority of respondents thought the subsidy should be based on qualifying benefits as means testing would be costly and difficult to administer. It was suggested that a basic level grant could be offered to all vulnerable households with a benefits related or means tested top-up being available for those households on low incomes, or alternatively the subsidy could be linked to the council tax banding as a measure of the size of the property.

Insurers

There was an agreement amongst insurers that the subsidy should be offered to all at-risk properties.

Providers of flood protection measures, products and surveys

Respondents agreed that the subsidy should be offered to all at-risk households with suggestions that the subsidy could use a sliding scale based on risk/hazard,

benefits/costs of measures and ability to pay. Means testing should not factor when administering the scheme.

Individuals and community groups

There was general agreement that the subsidy scheme should be offered to all at risk properties. There was some support for focusing on vulnerable, low-income properties but that the scheme should not be limited to those on benefits.

Professional associations, institutions and academics

Professional association, institutions and academics expressed support for the subsidy scheme to be offered to all at-risk properties. One respondent wanted to see the subsidy offered to all at risk properties but those on high income receiving only partial funding. There was some support for the availability of the subsidy being based on the size of the risk and the amount of potential savings. It was widely agreed that basing the subsidy on benefits or means-testing would be costly to administer and an inefficient use of resources.

Q10 Do you think that the costs and benefits for the government schemes outlined in the Impact Assessment (Annex C) are reasonable estimates? Do you have further information to help refine the estimates?

Operating authorities including local authorities and the Environment Agency

The majority of respondents felt they could not comment on the costs and benefits outlined or they referred to their answer given in question one of the consultation.

Insurers

Respondents felt they were not in a position to comment on the estimated costs and benefits for the government scheme.

Providers of flood protection measures, products and surveys

One respondent felt that the costs and benefits were too conservative; whilst others felt they could not comment or referred to their answer for question one.

Individuals and community groups

Again, most respondents believed they were not in a position to comment on the estimated costs and benefits. Others thought the costs seemed reasonable.

Professional associations, institutions and academics

Respondents felt the costs and benefits were reasonable and had no further information to add to the estimates.

Q11 Which approach do you think will be most effective at increasing take-up – offering free home surveys to households in a large number of high risk communities, or offering to subsidise property-level measures for households in a smaller number of communities?

Operating authorities including local authorities and the Environment Agency

Overall, operating authorities agreed that the most effective approach at increasing take-up of flood protection measures would be to offer to subsidise property-level measures to households. Most respondents felt that it was unlikely take-up would increase if households had to incur the costs of installing flood protection measures.

Insurers

Responses to this question were broadly divided. Several responses indicated that a free home survey would effectively increase take-up whilst reaching the largest amount of properties possible, suggesting that offering a free home survey would inform property owners of the actions they could take to protect their property, and provide insurers with the information they needed to advise property owners on the terms they can offer, with and without the risk improvements suggested.

There was also significant support for subsidising the cost of implementing flood protection measures as the most effective option.

Providers of flood protection measures, products and surveys

The majority of responses from providers indicated that providing subsidies to property owners was the most appropriate way to increase take-up of flood protection measures. There was also a belief that although the free home survey would educate the homeowner to water ingress routes which existed on their property and highlight ways to reduce the risk in the event of a future flood, it could also create a barrier to the take up of the recommendations due to the homeowner being made aware of the financial costs to protecting the property.

It was also suggested that the grant scheme needed to be visible to vulnerable communities and show that government is putting the recommendations of the Pitt Review into practice in a commercially effective and timely manner.

Individuals and community groups

There was unanimous support for the subsidy scheme amongst individuals and community groups with respondents believing that offering to subsidise property level measures would be a better way of increasing take-up than offering a larger number of free surveys. It was felt that people needed to see the work being done and the flood protection/resilience actually bringing the benefits.

Professional associations, institutions and academics

There was general agreement that offering to subsidise property level flood protection would increase take up more effectively, as this would help overcome the hurdle of meeting the up-front costs of flood resilience measures. It was thought that it could also encourage businesses to provide the capacity needed to deliver more widespread flood resilience improvements. Others felt that offering a subsidy scheme had the potential to result in more community engagement and feelings of unity in neighbours implementing similar measures.

Q12 How could local authorities, the Environment Agency and communities best work together to deliver property-level schemes? What should their respective roles be?

Operating authorities including local authorities and the Environment Agency

There were a wide range of suggestions given in response to this question; however the majority of responses indicated that the Environment Agency and local authorities would need to work closely together. Suggestions included:

- (i) Environment Agency to identify at-risk households and provide local authorities with the survey guidance, product and installation advice and guidance, as well as develop the quality assurance for the relevant property-level measures. Local authorities to administer the grants and carry out the free surveys.
- (ii) All operating authorities that have powers under the Land Drainage and Water Resources Acts to implement flood relief improvement works should assess the flood risk and benefits and then engage in public consultation along lines currently used for area based capital schemes.
- (iii) To determine eligibility for subsidy the Environment Agency should advise on fluvial risks while Local Authorities and communities should work together to assess non fluvial risk. Once eligibility is confirmed Local

Authorities would be able to distribute the subsidies through their Housing Departments.

- (iv) One organisation should have the authority, responsibility, funding, skill base and local knowledge to co-ordinate and implement preventative repairs, maintenance and improvement of all aspects of catchment drainage.

Insurers

Insurers generally believed that the Environment Agency should take a clear leadership role by managing the scheme whilst the local authorities should administer and deliver the service in conjunction with local community groups.

Providers of flood protection measures, products and surveys

The majority of respondents agreed that the Environment Agency should take a management role in the grant scheme and should help lead, direct, facilitate and monitor the process. Local authorities should administer the scheme and be the key link with householders acquiring specialist knowledge from private industry as well as the Environment Agency when required.

Individuals and community groups

As with other respondents, individuals and community groups felt that the Environment Agency and local authorities would need to work closely together to ensure the effectiveness of the scheme. Only a few respondents thought the scheme should be left entirely to the local authorities. A number of respondents suggested that the Environment Agency should provide a leadership role whilst the local authorities should distribute and monitor the subsidy.

Professional associations, institutions and academics

Respondents suggested that the Environment Agency should work with the insurance industry and providers of flood protection measures, as well as local authorities and communities. There was also some thought that the Environment Agency should collect property level flood data whilst the local authorities would provide the link between users such as householders and independent assessors. They should also be responsible for administering any grant scheme.

Q13 What would be the most effective ways of consulting with members of selected communities in order to communicate risk information, help them understand flood protection and resilience, and engage them fully in the schemes?

Operating authorities including local authorities and the Environment Agency

Operating authorities suggested that a range of methods would need to be used such as the sending of information literature to households at risk (e.g. leaflets, newsletters), holding public discussion meetings, setting up a helpline, using district representatives, Parish and Town Councils, using flood product fairs, and engaging with existing local flood action groups or campaigns.

Insurers

Most insurers felt that local authorities were best placed to consult with members of communities. Local authorities could then engage with local interest groups, resident associations and parish councils. Information on the scheme and risks should be publicised through the usual channels, such as local press and radio. Consideration should be given to alternative methods of communication for those in high flood risk areas such as direct mailings, information posters in public areas such as libraries, shopping centres, or leisure centres.

Providers of flood protection measures, products and surveys

Respondents believed that a range of methods could be effectively used in communicating risk to communities. Local authorities could take the lead but also the Association of British Insurers and individual insurers could communicate messages directly to their customers. Members of the parish, district, county councils and Unitary Authorities could use their pre-established lines of communication in those affected communities.

It was also suggested that The National Flood Forum could be used to promote protection and resilience products through organised flood fairs.

Individuals and community groups

Individuals and community groups suggested several methods that could be used to communicate with communities. Local Authorities should be expected to lead, involving local community bodies such as parish councils and community flood groups where possible. There were other suggestions such as: the Environment Agency; an appointed community representative in the Parish Council; organisations such as the National Flood Forum; and holding awareness raising sessions to highlight that an area had been selected. This should involve Environment Agency, local authorities, community representatives, and surveyors/consultants and contractors/product suppliers.

Professional associations, institutions and academics

It was felt that the most effective way of engaging with communities was through existing communication channels, including local publications, parish meetings, and local coordinating committees.

Q14 Do you support an approach that promotes local flexibility of spend or do you prefer a nationally consistent approach?

Operating authorities including local authorities and the Environment Agency

Most authorities indicated that they would support an approach that promoted local flexibility based on national guidelines. It was also suggested that a nationally driven approach would provide fairness and equality across the country. This could be locally managed and implemented.

There was also some support for a local approach as no two areas were the same, and there was normally a range of potential solutions of varying cost and complexity.

Insurers

Generally, respondents supported a nationally consistent approach. However, one respondent felt the importance of local knowledge should not be underestimated, and there must therefore be a degree of flexibility incorporated into any scheme to allow for this.

Providers of flood protection measures, products and surveys

Providers of flood protection measures supported a nationally consistent approach with one respondent stating that it was the only rational way to roll out a scheme of national importance. There was concern that local flexibility at Local Authority level could lead to a post code lottery and the promotion of unsuitable products being deployed. It was felt that the Environment Agency had the expertise in this area and should determine policy centrally. It was felt that the approach needed to be as fair as possible and a national framework should set key objectives, outputs and outcomes and guidelines. It should also support local authorities in implementing the scheme with local flexibility to meet local needs whilst keeping to the core objectives and outcomes.

Professional associations, institutions and academics

The majority of respondents felt that a nationally consistent approach was more appropriate for the implementation of the subsidy scheme. One group felt consistency was required to ensure that those facing the same sorts of risks had

access to the same levels of support. It was thought that promoting flexibility was vital, in particular where the risks involved were dependent on local geography and understanding of the communities.

Further issues, including encouraging resilient repair and refurbishment

Q15 Which professional groups are appropriate for the role of conducting household flood risk surveys? What more needs to be done to increase capacity and expertise on flood risk issues amongst these professional groups?

Operating authorities including local authorities and the Environment Agency

Operating authorities suggested a range of professional groups were appropriate to conduct household flood surveys. These included building and chartered surveyors, engineers and architects, environmental health officers and drainage consultants. It was also suggested that Defra should develop a national list of approved surveyors, with regional or local sub-lists.

It was suggested that improved awareness of the sources and pathways for flooding, and understanding flood models would help deliver better quality surveys. A specific training course should be created to produce numbers of professionally qualified, competent and insured people.

Insurers

Professional groups suggested by insurers included:

- (i) Royal Institute of Chartered Surveyors
- (ii) Civil engineers
- (iii) Hydrologists
- (iv) Professional groups in the insurance industry.

There was some suggestion that additional training/education was something best dealt with by the groups concerned, or alternatively an accredited qualification or training programme would be appropriate and provide confidence to homeowners.

Providers of flood protection measures, products and surveys

The majority of providers believed that the Royal Institute of Chartered Surveyors (RICS) could be a leading body for flood surveys. However, there were

independent flood assessment companies in the UK who were not members of RICS or other professional bodies that should not be overlooked.

In terms of ways to increase capacity and expertise, one respondent suggested that less in-depth qualifications should be required, and more building specific training that could be completed in a shorter time scale, allowing those interested in gaining and using these qualifications to be in the market place in as short a time as possible.

Individuals and community groups

As with other responses, individuals and community groups believed that a number of professional groups could be used to conduct household flood risk surveys. Members of two groups not mentioned elsewhere are the Institution of Civil Engineers and the Chartered Institute of Water and Environmental Management. One respondent felt that the Environment Agency should have control over, and responsibility for, conducting the individual flood risk assessment process, irrespective of whether the risk assessments were carried out in-house by professionals employed by the Agency, or by contractors to it.

Respondents commented that a specific qualification developed for the purpose would be desirable. One respondent believed there was currently a shortage of professionals able to offer household flood risk assessments and this would hamper the initiative if the problem was not addressed. They felt the RICS and other similar organisations were best placed to deliver this very necessary accreditation.

Professional associations, institutions and academics

A number of suggestions of appropriate professional groups were made by respondents, including the consultancy and engineering industry, the insurance industry, building surveyors, RICS and domestic energy assessors.

There was also some thought that the number of professionals with the knowledge, skills and experience to quantify the extent of flooding was limited and no group had the full range of skills necessary to carry out these assessments. There was no consensus on whether the extra training required was substantial for those professionals not qualified in this area. Unlike other assessment schemes, the risk associated with a wrong assessment could be severe and the requirements for professional indemnity would be significant.

Q16 How can we encourage new innovative flood protection products, while ensuring a robust system for testing new products? What is needed to provide assurance that products are suitable for their intended use, such as the reinstated BSI Kitemark or an alternative quality assurance mark?

Operating authorities including local authorities and the Environment Agency

Operating authorities suggested several ways the government could encourage new innovative flood protection products. One of the main themes was reducing the cost of obtaining product certification. There was also some thought that the introduction of this scheme should stimulate the market to be innovative. Other suggestions included: Building Regulations could be introduced that ensured that particular building standards were required in all flood risk areas; tax breaks could be given to involved firms; and other companies should be looked at who can provide quality control..

Insurers

Insurers generally agreed that the BSI Kitemark quality assurance mark or equivalent would be appropriate. One respondent suggested that it would give suppliers, customers and insurers a benchmark to work from in a field which, to date, is very lacking in experience and range of products. There were no suggestions on how government could encourage innovation of flood protection products.

Providers of flood protection measures, products and surveys

The majority of respondents agreed that the BSI Kitemark quality assurance mark should be used to test new products. One respondent suggested that this was a well established and recognised brand of, not only quality products, but also of quality companies and manufacturing processes. They felt that there was an issue around other products on the market, not bearing the BSI Kitemark, leading to consumer confusion about what to buy.

Individuals and community groups

Individuals and community groups suggested that government could encourage innovation of new products by offering grants, loans and subsidies to innovators, running a publicly owned testing rig available to provide Kitemarking for free or very low cost, and by commissioning a specialist group to determine what measure is necessary to meet a product shortfall.

Professional associations, institutions and academics

There were mixed views from this group of respondents. Some thought that innovation will be driven by market demand. Others felt that testing of new products needs to be as inexpensive as possible without compromising the quality of the test. One response suggested government could fund testing of a limited number of products each year via a dedicated facility.

In terms of what was needed to provide assurance, one respondent suggested testing regimes would need to be robust enough to provide quality assurance, yet not so onerous as to delay unduly the launch of new products and services to market. Another felt the BSI Kitemark scheme should be utilised as it was well established and understood by the majority of householders.

Q17 Do you think we have identified the correct costings and the range of costs are right? Do you agree with our analysis of the costs and benefits of flood resilience (Annex C)?

Operating authorities including local authorities and the Environment Agency

The majority of operating authorities felt they were not in a position to comment on the costs identified. Others generally agreed that the costs outlined seemed reasonable and had no evidence to suggest otherwise.

Insurers

Respondents agreed with the costs that have been identified.

Providers of flood protection measures, products and surveys

The majority of respondents felt the costs seemed reasonable but had no expertise in the area. One respondent commented that they thought the reinstatement costs were nearer to between £20,000 and £40,000, as opposed to between £20,000 and £30,000 that the consultation document details.

Individuals and community groups

Respondents felt they did not have the necessary skills to comment on the costs outlined.

Professional associations, institutions and academics

The majority of respondents did not have any specific comments. However, one respondent believed that the wide variety of buildings that were likely to be included in this scheme made the identification of typical costs difficult.

Q18 In the event of a major flood, would the supply of skills and materials be sufficient to enable the resilient repair of all affected homes? Would bottlenecks in the supply system cause delays in restoration?

Operating authorities including local authorities and the Environment Agency

Generally respondents agreed that it was unlikely that there would be sufficient skills and materials available in the event of a major flood. One authority felt there was currently a lack of skills and materials sufficient to enable the resilient repair of homes affected by flooding. Experience has shown that good, quality builders are inundated with work to deal with these repairs causing many victims to be out of their homes for many months, sometimes years.

Due to the potential for bottlenecks in the supply system causing inevitable delays, it was suggested that a proactive approach would be to build in resilience prior to a flooding event.

Insurers

Most insurers agreed that there would be insufficient supply of skills and materials available for resilient repairs. Several respondents believed there not to be enough professionals who were qualified to advise on flood resilience.

Providers of flood protection measures, products and surveys

Respondents felt that based on the Summer 2007 floods, supply of skills and materials would not be sufficient, and bottlenecks in the supply system would cause delays.

One respondent believed that the problems with the supply of skills and materials and bottlenecks in the system would exist after a major flood irrespective of whether resilient repair or like for like repair was put into place. They felt that at least with resilient repair the homeowner was reducing the financial impact in the event of future floods.

Individuals and community groups

A widely held view amongst individuals and community groups was that the supply of skills and materials would not be sufficient. Several respondents commented that resilience would not change this shortage.

Professional associations, institutions and academics

Most respondents agreed that there would be a shortage of skills to deliver in the aftermath of a major flooding event. One respondent felt that the supply of skills to adequately repair homes was significantly below that required. This could lead

to inexperienced contractors carrying out substandard work without adequate supervision.

Q19 Do you think that an independent quality-assurance standard would help to encourage resilient repair? Are there other viable voluntary approaches?

Operating authorities including local authorities and the Environment Agency

Most respondents generally thought a quality-assurance standard would help encourage resilient repair. The standard would provide households with confidence in products and resilience works.

One respondent felt the best approach would be to see examples of when products and measures have been put to the test in real situations, and the avoidance of damage caused to a property would need to be publicised, to increase take up of these measures.

Insurers

Responses from insurers generally indicated that they supported a quality assurance standard for flood resilient repairs.

One respondent felt people would like to see a recognised accreditation or standard to show that homes were built to flood-resilient standards. Consumers would have more confidence in a property's ability to withstand a flood, developers could use it as a marketing tool, and insurers would be better placed to offer competitively-priced flood insurance.

Providers of flood protection measures, products and surveys

Providers of flood protection measures, products and surveys generally thought that the introduction of a standard would not increase resilient repair. Some thought a quality assurance standard would only make a difference to those that had to bear the full cost of resilience measures themselves. Whilst others suggested that insurers/assessors were ideally placed to educate and inform restoration builders of resilient repairs which needed to be put into place.

Individuals and community groups

Responses amongst this group were mixed. Several respondents thought a quality assurance standard would encourage resilient repair. One stated that

once people could see clearly what flood-resilient work entailed following flooding, they were more likely to adopt the approach.

Professional associations, institutions and academics

Generally, respondents agreed that introducing an independent quality assurance standard would reduce doubt and uncertainty amongst property owners and theoretically increase resilient repair. One respondent agreed that an independent quality-assurance standard could ensure uniformity of standards, as one could not know whether the measures were effective until the actual flooding risk occurred.

Respondents felt that voluntary approaches were not appropriate for resilience type work.

Q20 Is compulsion an appropriate way to increase the use of resilient repair in high-risk homes or do you think individual consumer choice is the right route? Would you support a compulsory requirement for resilient repairs if an economic case could be made for such a requirement?

Operating authorities including local authorities and the Environment Agency

There was some support for using compulsion to increase resilient repair in high-risk homes. However, there was disagreement on how this should be administered. One respondent suggested that compulsion should be restricted to building resilience in to new properties in flood risk areas whilst others felt that amending the current Building Regulations would be the best approach.

Many respondents did not support compulsion and felt that resilience was best progressed by developing the understanding and commitment of householders.

Insurers

Responses from insurers generally opposed making resilient repair in high-risk homes compulsory, believing that every effort should be made to convince the owners of flood vulnerable properties to make resilient repairs in their own interest.

There were concerns that if resilient repairs were to be made compulsory there would be a shortage of skilled labour. One insurer also stated that current insurance policies states that properties will be reinstated, following a flood, on a like-for-like basis, funded by the insurer. According to the insurers, this helps ensure that the policyholder gets a fair deal, and that claims costs (and therefore

premiums) are kept at an acceptable level. Compulsory resilient reinstatement would make the cost of a claim higher, with this cost being passed onto the policyholder, who may not even want these measures in the first place.

Providers of flood protection measures, products and surveys

Some providers of flood protection measures supported a compulsory requirement for resilient repairs, with one provider suggesting that resilient measures would ultimately reduce the long term costs to the insurance industry and economy and keep the emotional upheaval of experiencing a flood to a minimum. Other respondents thought that individual consumer choice would be more suitable.

Individuals and community groups

A number of respondents wanted to see resilient repair made compulsory for high-risk homes but only if it was supported by a government grant scheme to assist with the extra costs to homeowners. There was also some support for including this in Building Regulations.

Professional associations, institutions and academics

Several respondents indicated that they would support compulsion of resilient repairs in new build and renovation projects and included in the Building Regulations. There were concerns however that compulsion could encourage property owners to do the bare minimum or cut corners and that compulsion could be met with resistance or resentment.

Annex 1 - List of respondents to the consultation

Operating authorities including local authorities and the Environment Agency

Aylesbury Vale District Council
Bedford Borough Council
Bedford Group of Drainage Boards
Cherwell District Council
East Herts Council
English Heritage
English Partnerships
Environment Agency
Gloucester City Council
Gloucestershire County Council
Greater London Authority
Herefordshire Council
Hull City Council
Lancashire County Council
Leeds City Council
Lewes District Council
Milton Keynes Council
Salford City Council
Severn Trent Water
Shropshire County Council
South Somerset District Council
South West Water
West Oxfordshire District Council

Insurers

Association of British Insurers (ABI)
British Insurance Brokers Associations (BIBA)
Norwich Union
RBS Insurance

Providers of flood protection measures, products and surveys

Eco-coverage Technologies Ltd
Flood Ark
Flood Management Support Services Ltd
Flood Risk Management Services Ltd
Floodgate
Floodguards Systems Ltd
Revetment Flood Protection

Individuals and community groups

Alan Allison
Bewdley Residents' Flood Committee
Dewsbury West Neighbourhood Management Pathfinder
Ian Wood
Julian Payne
Mike Maddocks
Neighbourhood Watch
Stephen Horne
Steve Bengé
Sunderland Point Community Association
The Kensington Society
The National Flood Forum
Tony Cornell

Professional associations, institutions and academics

Association for Consultancy and Engineering
Awarding Body of the Built Environment (ABBE)
British Property Federation
Lancaster University
Landmark Information Group Limited
National Housing Federation
Property Care Association
The Institution of Civil Engineers
UK Environmental Law Association
University of Wolverhampton

Annex 2 - List of questions raised in the consultation document

Part 1: Consultation Overview

- Q.1 Do you think that the costs and benefits for the measures outlined here and in the Impact Assessment (Annex C) are reasonable estimates? Do you have further information to help refine the estimates?
- Q.2 Do you think that the Government needs to give more information to high-risk properties and help them do more to protect themselves? Alternatively, do you think that the level of property-level flood protection and resilience should be left to market forces and individual choice?

Part 2: Increasing take-up of property-level flood protection and resilience

- Q.3 If a government grant scheme were to be introduced, do you agree that it should initially focus on households rather than businesses?
- Q.4 Do you think that a free home survey scheme would be an effective way to drive increased take-up of property-level flood protection and resilience? What else could be done to encourage greater voluntary take-up of such measures?
- Q.5 Is it reasonable to expect people living in high-risk areas to pay much or all of the cost of protecting their homes from flood damage? What viable options exist for supporting lower-income households?
- Q.6 Is it appropriate to use public funds to subsidise the costs of flood protection or resilience for individual properties, rather than just paying for a free home survey?
- Q.7 Do you have suggestions on how we could ensure that any future grant scheme is simple to administer but also fair? Do you think that it would be a good idea to deliver the free surveys or the subsidises via teams who already deliver similar schemes, such as those responsible for private sector housing renewal?
- Q.8 Should any subsidy scheme offer full subsidies for a small number of high risk properties or partial subsidies for a larger number of properties? Is it a £4,500 cap for the measures themselves (excluding survey) an appropriate level for the subsidy?
- Q.9 Should the subsidy be offered to all appropriate at-risk properties or only low-income households or communities? Should the subsidy be available to all those on qualifying benefits or based on full means-testing?

- Q.10 Do you think that the costs and benefits for the government schemes outlined in the Impact Assessment (Annex C) are reasonable estimates? Do you have further information to help refine the estimates?
- Q.11 Which approach do you think will be most effective at increasing take-up – offering free home surveys to households in a large number of high risk communities, or offering to subsidise property-level measures for households in a smaller number of communities?
- Q.12 How could local authorities, the Environment Agency and communities best work together to deliver property-level schemes? What should their respective roles be?
- Q.13 What would be the most effective ways of consulting with members of selected communities in order to communicate risk information, help them understand flood protection and resilience, and engage them fully in the schemes?
- Q.14 Do you support an approach that promotes local flexibility of spend or do you prefer a nationally consistent approach?

Part 3: Further issues, including encouraging resilient repair and refurbishment

- Q.15 Which professional groups are appropriate for the role of conducting household flood risk surveys? What more needs to be done to increase capacity and expertise on flood risk issues amongst these professional groups?
- Q.16 How can we encourage new innovative flood protection products, while ensuring a robust system for testing new products? What is needed to provide assurance that products are suitable for their intended use, such as the reinstated BSI Kitemark or an alternative quality assurance mark?
- Q.17 Do you think we have identified the correct costings and the range of costs are right? Do you agree with our analysis of the costs and benefits of flood resilience (Annex C)?
- Q.18 In the event of a major flood, would the supply of skills and materials be sufficient to enable the resilient repair of all affected homes? Would bottlenecks in the supply system cause delays in restoration?
- Q.19 Do you think that an independent quality-assurance standard would help to encourage resilient repair? Are there other viable voluntary approaches?
- Q.20 Is compulsion an appropriate way to increase the use of resilient repair in high-risk homes or do you think individual consumer choice is the right route? Would you support a compulsory requirement for resilient repairs if an economic case could be made for such a requirement?