



Pitt Review on Flooding London First response to interim report

London First is a business membership organisation with the mission to make London the best city in the world to do business in. We represent the capital's leading employers who account for over 26% of London's GDP. A key priority is promoting London as a safe and resilient city. We work to improve the communication between business, government and the police services at a strategic level, encouraging progressive ideas and innovative partnerships. We are delighted to have the opportunity to share the views and recommendations, on behalf of the business community, in response to the Pitt Review's interim report on Flooding.

General comments

The report is a terrific foundation to identify the lessons from the 2007 floods. The report made some excellent recommendations, most of which London First supports.

1. Although London was not affected to the same severity as the rest of the country, the floods allowed us to consider how London might respond to a major flooding incident. It is generally agreed that weather is getting worse, not better, and it is clear there will be a role for private sector in tackling the effects of severe weather. The report falls short of clearly outlining the role and expectations on business, however, it offers a good platform for debate with business on shared issues.
2. As an independent report, the review team were able to tackle complex, in-depth issues to highlight gaps in multi-agency working and the supporting policy. The challenge, to ensure we really learn the lessons, will be to get commitment from senior government to maintain the pressure for progress on the recommendations.

Engagement with business

3. London First members list flooding as their third greatest concern to business continuity, after terrorism and power outages. Historically the Environment Agency's engagement with residents has been very good but engagement with business, on business issues has been sporadic. Our members would welcome more opportunities to openly discuss the role of businesses, particularly the role of retailers during major flooding incidents.
4. In December 2006 London First held a briefing on Flooding that included the Environment Agency. It would be useful to have more business briefings on flooding issues, particularly on the implications for businesses from the Pitt review.
5. Since business has not been engaged sufficiently so far, there is a concern that The Environment Agency and emergency planning officers do not fully understand the critical issues facing employers. A dedicated business liaison officer at the Environment Agency would help in the challenge against flooding and extreme weather. A business liaison would be a catalyst to explore the role of businesses and the opportunities to work together to prevent, plan and protect against potential impact of severe weather.

Surface water flooding

6. The 2007 floods showed the significant risk from surface water flooding and the necessity to take flash flooding and flooding due to prolonged rain just as seriously as tidal and river flooding. More needs to be done to raise the awareness of the risk from surface water flooding and promoting guidance on managing a flash flood incident. It is worth noting that almost 60% of businesses that we surveyed have emergency power sources located in basements, at risk from flash and surface water flooding.

Clarity on roles and responsibilities

7. There is confusion about the roles of the Environment Agency, Defra, local councils, water companies and transport authorities in relation to managing a flooding incident. A clear outline of what organisations are responsible for which functions and at what stage of a flooding incident, is critical to business continuity and national economic wellbeing. Including who is responsible for specialist water rescue which at this stage is unclear.

Detailed comments

Climate change adaptation

8. We support the recommendation that organisations should consider at the design stage of new buildings, measures protecting against a changing climate, so as to avoid expensive retrofitting in the future. Clarity however is needed on what it practically means to 'consider at the design stage'. The Lord West review (November 2007) is also calling on businesses to consider protective security at the design stage. Joined up guidance on both these issues would be welcomed by business.
9. Practical advice for businesses generally, not just the developers, should be available, interpreting the implications from Planning Policy Statement 25 (PPS25), promoting flood resistance and resilience measures and clarity on the role of wider business. Guidance should be aimed at operational business leaders such as business continuity and risk managers.

Modelling and mapping flood risk

10. Many businesses do not believe they are at risk of flooding because they are outside flooding zones and therefore may not have tested their resilience plans accordingly. We welcome the recommendation calling on the Met Office and Environment Agency to explore the costs, benefits and feasibility of techniques to predict where surface water flooding will occur.

Surface water flooding and drainage

11. London First supports in principle, the recommendation for local authorities to lead on the management of surface water flooding and drainage at a local level. Information clearly outlining the roles and responsibilities of The Environment Agency, water companies and other supporting agencies would be useful to business and ought to form part of the guidance to be developed.
12. For completeness the strategic responsibility for surface water flooding should fall to The Environment Agency who also has the strategic and national role in coastal and river flooding.

Insurance

13. To raise the profile of the risk of flooding, it would be useful to involve business in the guidance to be developed. Joint guidance between business, the insurance industry and the Environment Agency would be best placed to encourage businesses to test continuity plans against the effects of severe weather. The joint guidance developed with business, for business - should include:
 - Practical guidance on preparing for a flood;
 - Useful information and contacts during a flood; and
 - Post-flood advice.

Understanding critical infrastructure

14. London First will be suggesting to the Civil Contingencies Secretariat that the review of The Civil Contingencies Act, due in summer 2008, should include the views of business. In particular, business should be engaged regarding the role of Category 2 (C2) responders - such as information sharing, commercial sensitivities, legal obligations as well as considering which other organisations should be included in the group. The proposed consultation with business is in support of the interim conclusion that C2 responders more formally contribute information on critical sites, their vulnerability and the impact of their loss.

15. There is tremendous support from London First members for business representation at resilience exercise tests, such as the recent London exercise, testing Gold Command structures based on a flooding scenario. Just as faith groups are often invited as observers to exercise tests, business should be given the same opportunity, and if called upon, add relevant value to the exercise by explaining how business would respond in such incidents. It is often forgotten that businesses, especially large companies, have significant potential coverage over movement of people, and a duty of care to their staff.

Local emergency response

16. In London, boroughs responded well locally and it took some time before the London Resilience Team (LRT) was alerted to local situations. If the incident escalated quickly many boroughs would have been alerting London Resilience at the time aid was needed, not giving LRT as much time as they could have had to prepare their response. Local resilience forums act as the strategic body, monitoring the local responses. Boroughs should alert local resilience forums simultaneously to responding to an incident, especially when severe weather warnings have already been issued.
17. The review recommends the development and utilisation of flood visualisation tools for emergency planners, flood risk managers and responders. With a duty of care over staff, business equally needs these tools and we hope there is a view to share such resources with the business community. There is also an opportunity to work with business to share good practice, between sectors, on risk management.

Public awareness before emergencies

18. Awareness campaigns should be dynamic and interactive to attract a high volume of employer engagement. Online testing is an innovative, cost effective and surprisingly realistic way for businesses (small or large) to prove and improve continuity plans. Participants are involved in active learning and have the chance to practice their response and apply recommendations to realistic scenarios. In September 2007, London First, with the Environment Agency, carried out an online scenario that aimed to test business continuity plans against the effects of severe weather. More than 300 businesses signed up. It offered a dynamic platform for debate between private and public sector and allowed us to share good practice and signpost to current guidance. Online scenario testing has been successful in London and should be considered as part of a national programme to engage businesses and their staff.
19. Business umbrella groups like London First offer a terrific platform to promote new guidance with business audiences. Events are an opportunity for businesses to network with emergency planning officers.

Weather and flood warnings

20. A London First member survey (October 2007), found over half of businesses do not utilise the Environment Agency's floodline warning system, finding media sources more relevant. Many businesses are already signed up to community alert systems and it would make sense for Environment Agency flood alerts to utilise existing systems to reach a wider business audience. The Met Office severe weather warnings are already feed into CommunitySafe (free alerts to business) and Vocal (paid for service).
21. Business would find fast time communication during a flooding incident extremely useful. This might include information such as where flooding is expected, where it has already occurred, how transport has been affected and key contact details. Links to guidance on flood mitigation and insurance should be circulated with flood alerts. A scoping exercise exploring how boroughs intend to communicate with businesses during an incident should be delivered and the take up from local businesses reported.

Conclusion

Businesses are more likely to be affected by severe weather than by a terrorist attack, yet business preparedness does not reflect this. To move flooding risk up the agenda, more needs to be done to bring together key players in business with the Environment Agency and Insurance industry, to raise the profile of the risk of flooding, to begin a meaningful dialogue on the role of business and work together to encourage businesses to exercise their continuity plans against severe weather.

We are delighted that the Environment Secretary Hilary Benn is backing the Pitt review report. To ensure the pressure for progress remains, we suggest a briefing six months on, with business, the review team and relevant representatives to discuss feedback and developments. London First would welcome the opportunity to facilitate such a session, and indeed any of the other working groups mentioned, as part of our recommendations to engage business.

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