Sub-Contracting Risk: Neoliberal Policy Agendas and the Changing Perceptions and Practices of Flood Risk Management

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The floods of June & July 2007

- 55,000 properties were flooded (over 10 000 in Hull).
- largest loss of essential services since World War II
  - 500 000 people without mains water or electricity.
- Transport networks failed,
- Dam breach was narrowly averted and
- Emergency facilities were put out of action.
- Cost to the insurance industry or over £3 billion –
- other substantial costs will be met by central government, local public bodies, businesses and private individuals.(Pitt Report 2008)

Pitt Report 2008: calling for change

"The impact of climate change means that the probability of events on a similar scale happening in future is increasing.

So the Review calls for urgent and fundamental changes in the way the country is adapting to the likelihood of more frequent and intense periods of heavy rainfall..."

Is there a change in the nature of flood "regimes"?

- The Changing nature of a flood
  - changes in pattern of local level flooding over last 30 years – pluvial/fluvial
  - Shift in the impact of floods – increased urbanisation
- Changing nature of socio-political environment
  - How we govern flood management has changed
  - Have social/lifestyle changes affected flood impacts
  - Is flood risk an individual or collective responsibility: Big Society;
- Considering flooding as a socio-physical process: Are there distinctive flood regimes?

Pluvial flooding

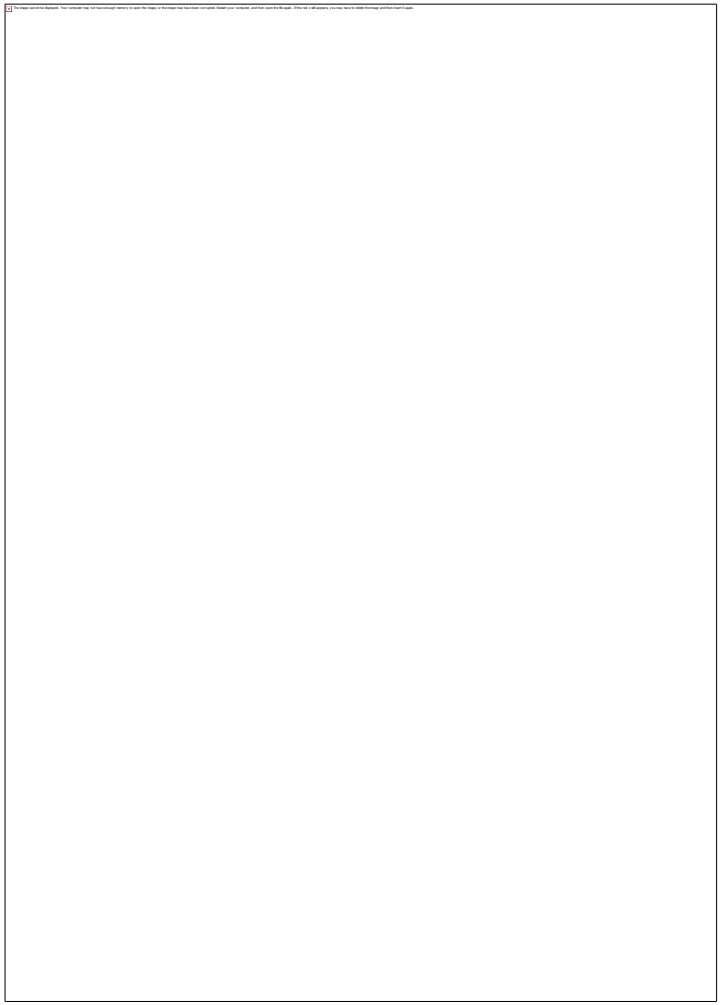
Trans-disciplinary Approach

- Attempts to apply trans-disciplinary approach by bringing together a team composed of a human geographer, environmental historian and physical geographer.
- To better understand how different parties to flood risk management perceive and respond to risk and how those attitudes have changed over the last fifty-five years.

- In the context of how privatisation and the contracting out of water management and local government services have altered the manner in which flood risk issues are addressed, especially with the rise of sub-contracting.

Methods

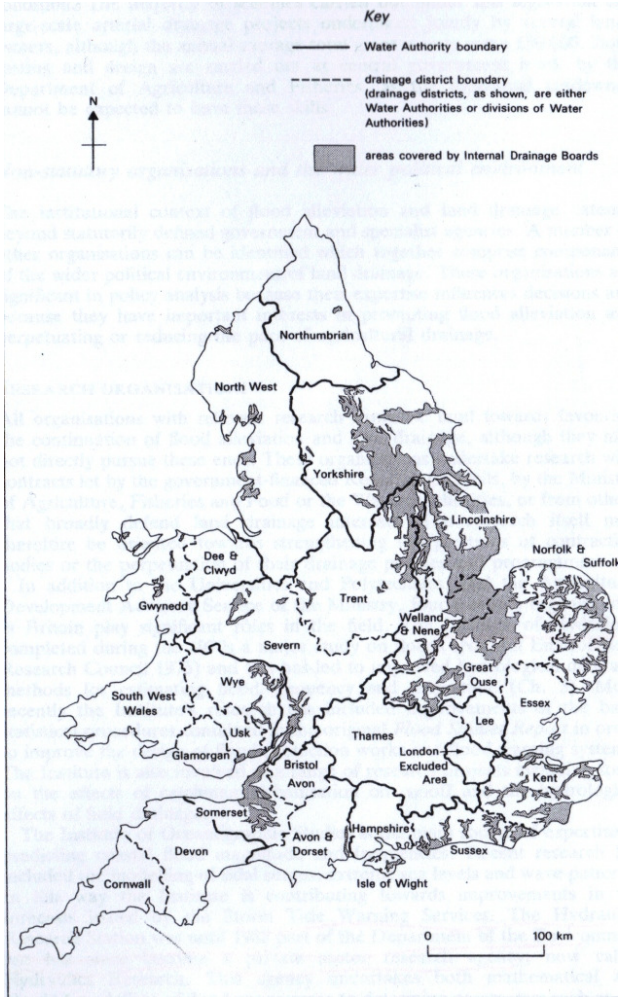
- Archival work on flooding
- Focus on Hull and environs
- Interviews with 35 local, regional and national actors, including officials, regulators, politicians, consultants, and others
- Active engagement
  - Independent Review of Hull floods
  - Advisory role on Hull's SWMP
  - Steering committee membership



Path dependence and historical lock-in

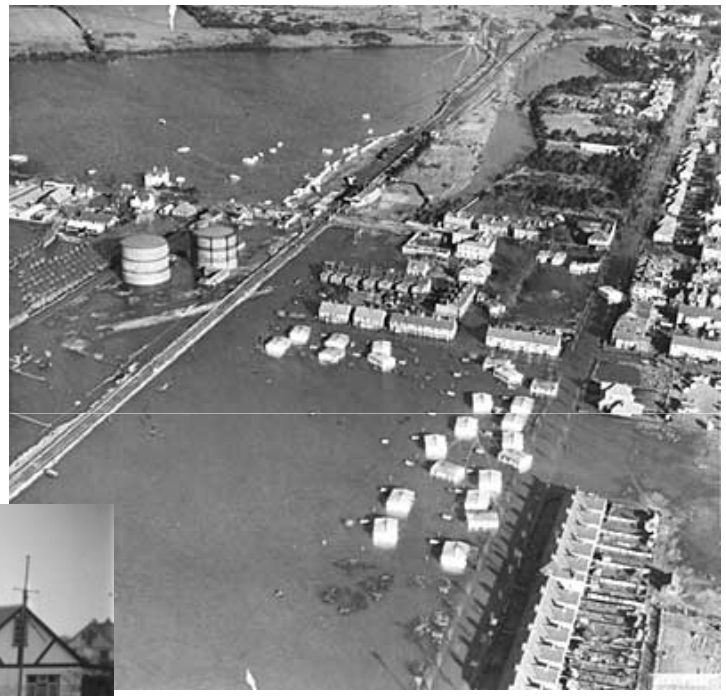
- "Inherent vulnerability" of much of landscape: background social vulnerability built up sequentially over time: "English Lowlands"

- "shared" common cultural and historical exposure to higher background levels of risk requires special consideration before any engagement with more specific factors of vulnerability



Major flood events as triggers to new flood regimes?

- 1953 East coast floods
  - 300+ die
  - major flood defence works follow
  - state welfareism in effect, with high levels of protection



Major flood events as triggers to new flood regimes?

- Easter 1998 - Northamptonshire and Wales
- 2000 – major floods, including North Yorkshire
  - triggers review of planning policy on flood plains
  - major increase in investment via Environment Agency budget

Major flood events as triggers to new flood regimes?

- 2005 Carlisle
- 2007 June: Yorkshire, July: South West
  - Triggered Pitt review
  - Future policy changes
- 2010 Cockermouth &Cumbria
  - ‘Wettest’ day in UK record
  - Recognition of climate change?

Flood risk policy milestones

- PPG 25: Development and flood risk (2001) superseded by PPS 25 (2008)
- ‘Future Flooding,’ Foresight OST 2004.
- ‘Making Space for Water’ consultation (2004) and response (2005)
- Future Water: The Government’s water strategy for England 2008
- Pitt report 2008
- European Floods directive (2009)
- Flood and Water Management Act (2010)

Governance of flood risk management:

Division of responsibilities in England and Wales

- **Environment Agency** General supervisory duty over all flood defence matters. Statutory planning consultee (England only).

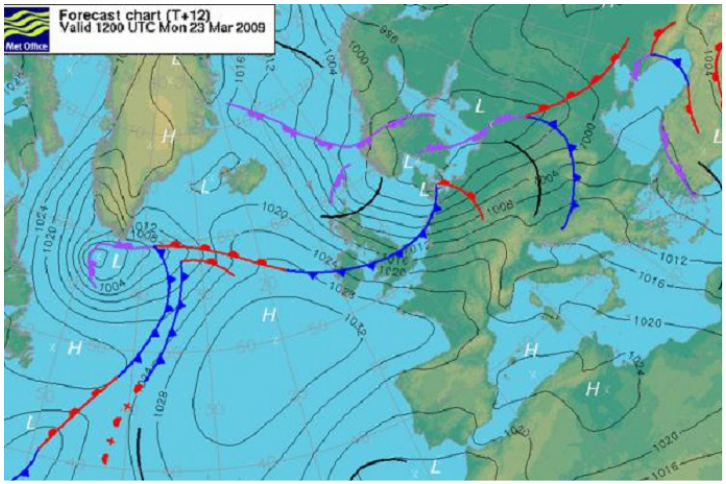
- **Local authorities** (including highway authorities) Surface drainage from roads and public spaces. Development planning control.

- **Water company** (as the sewerage undertaker) Statutory duty to deal with foul water and storm water received from water customers.

- **Emergency services**: Fire & Rescue - moral responsibility but no statutory obligation, multi-agency response

Adding complexity to this governance and policy landscape are:

- Regulators of these various actors – for instance OFWAT for the Water Companies
- Internal Drainage boards – particularly important in rural and lowland areas
- Met Office and other forecasters
- Contracting consultants
- EU WFD and now floods directive
- Developers and landowners, including riparian landowners
- The public



Diagnosing the problem – Areas of agreement

- Governance confusion and leadership absence – historical legacy
- Likelihood of future increase in flood events and mounting costs
- Changing nature of flood events – new flood regimes
- New approaches, moving away from ‘flood defence’ to ‘flood risk management’ – Making Space for Water/Living with Floods
- Need to improve communication and engagement with public about communicating uncertainties and flood risk
- Risk equations need to take greater account of consequences and wider costs – including vulnerabilities
- Taking greater personal responsibility for flood mitigation measures
- Loss of local expertise and knowledge on flooding

Catalyst of Change? Post-Pitt

- Environment Agency given lead national overview role for flood policy
- Much improved inter-agency partnership working with renewed emphasis on information sharing and working across LA boundaries
- Local authorities to be given lead role in ensuring local preparedness and response, through partnerships
- Considerable work commenced to understand surface water flooding, acknowledging lack of knowledge in this key area – SWMPs underway
- Responsibilities for SUDS clarified
- Work to train and recruit more experts, particularly for local government

SUDs system: Upton, Northampton

Can flood policy ever be neoliberal? The historical context

- Complex mixture of statutory and common law on drainage and flood matters based on the four principles
  1. individual riparian owner responsibility,
  2. permissive rather than mandatory powers,
  3. local decision-making,
  4. payment according to degree of benefit
- Long history of localised flood management accounts for the fragmentary character of contemporary watercourse management with its ambiguous division of responsibilities
- May explain why changes to water management have proven so hard to implement.

Can flood policy ever be neoliberal? The political context

- Collectivist - v - individualist tensions pervade flood policy
- Post-1953 rise in government flood defence spending & greater building on flood plains
- Growing post WW2 emphasis on urban flood management at expense of rural flood protection: cost–benefit analysis rules supreme
- Neoliberal policy struggles with imperfect, distorted or hidden information; and with, cross-boundary issues, including unclear and shared responsibilities

Neoliberal policy moments: Planning

- Roll-back deregulation of planning – presumption in favour of development and new housing development on floodplains: coincidence? Levee effect on a truly national basis?
- Roll-out neoliberal re-regulation, PPS25: *"The aims of planning policy on development and flood risk are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk*.
- EA as statutory consultee, sequential test, exceptions test, RFRAs, SFRAs

Neoliberal moments continued

- Privatisation of water companies and new regulatory frameworks – including OFWAT as economic regulator; take over local drainage maps, agency agreements with LAs for drainage vs in-house and contracting out.
- Roll-back of local government involvement, financial pressures and contracting out
- Loss of local drainage engineering capacity and ability to intervene over poor development in (many) LAs
- Cost-benefit analysis mode of regulation that favours those in urban or richer areas, more ‘valuable assets’
- Questioning of ‘equalisation’ policies – asking why should low risk areas cross-subsidise others?
- Moral hazard arguments around flood funding

Diagnosing the problem – Areas of contention

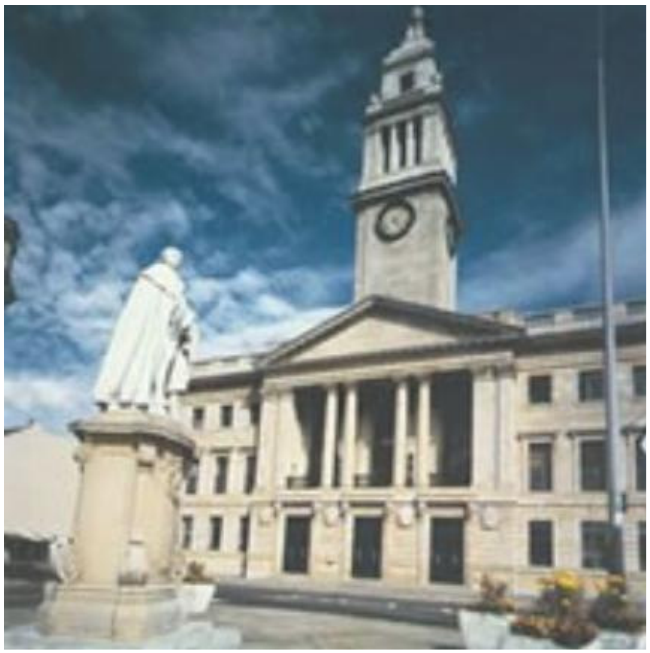
- Value of expert models under question – need for openness about their limitations
- Debates over economic limits to what we can afford to protect, especially rural as opposed to urban, food security versus infrastructure & built environment
- ABI : national government agreement (2008-13) on insurance knowledge: cover now under negotiation with ABI not wanting to extend it and looking for review of responsibilities – in effect calls into question geographical 'equalisation' policy
- Time scales – co-alignment of investment timescales, and also lumpiness – eg impacts of OFWAT 5-year AMP cycles leading to redundancies and loss of knowledge

Locating expert knowledges:

Locally embedded knowledge in 'halcyon days'

- Hull Independent Review expressed disquiet at loss of local knowledge of how local drainage systems worked as field engineers phased out
- Interviews – often corroborated loss and its importance at local level - but also a degree of inward-looking and protectionism involved?
- Much expertise is recycled and relocated in system, not lost – yet but generation retiring soon & no one to replace them with
- Inadvertently may have fostered more consultation with public in search of 'lost' local knowledge
- Digitalisation of local knowledge: Good or Bad?

Guildhall, Hull



Locating expert knowledges:

Contracting out – the rise of the consultant & contractor

- Counterpoised to loss of local knowledge is the rise of the consultant and contracting out
- Contractors "possess" expertise, innovation and ability to cope with peak work loads
- Gives access to national and international best practices
- Often felt to be cheaper than permanent in-house staff
- Frameworks and alliances work well in requiring sharing of private knowledge
- Problems may emerge unless there is an "intelligent client"

Competing knowledges –
Burstwick Drain

- 130+ houses (mainly new build) flooded in small village in 2007
- EA maintains drain with policy of “no regular dredging” backed by its consultants but residents & local farmers dispute this regime
- Community action creates Burstwick United & raised money to hire own “expert” knowledge with Dutch consultancy who claim regular draining increase flow up to 50% - ignored by EA
- Near flood event in January 2008 leads farmers to act on community’s behalf to clear obstructions
- Other forms of cooperative action
- EA spends £2m on large scale flood defence earthworks

Burstwick Drain, Hedon

The shape of the flood regime to come?

- Changes in event magnitude and frequency: climate change or not?
- “Lock-ins” from past resist easy changes to flood governance
- Sub-contracting and newly constructed “cycles” to expert knowledges – unclear effects
- Multi-agency/partner responses without clear pathways of leadership, responsibilities: 2010 Water Act?
- Big Society: Myth or reality?

Young lovers in flood England

Preliminary findings and thoughts

- Limits of localism in flood risk policy, given multi-scalar and boundary crossing nature of flood risk and flood events.
- Communicating changing ideas about risk to public has been problematic so far – few seem to understand the government's thinking
- Experts more sceptical of their own models than some policy makers
- Nationalisation of risk management (including flood) & its consequences since 1953 disempowered individual & communities
- Different risk levels for drainage, fluvial and coastal flooding based on historical records of event frequency and magnitude that may no longer be indicative

But some positives

- Improved awareness of importance of critical infrastructure risks – clean water, electricity, hospitals, communications etc..
- Including new (GIS-based) mapping of assets (drains, culverts, watercourse) and retrieval of some lost knowledge
- Improved partnership working between local government, EA, planners and emergency services
- Adaptation measures for new housing quickly ushered in through planning – at least in Hull

Conclusions (very preliminary)

- Flood regimes evolve in complex and unpredictable ways
- Historical evolution of policy and its embeddedness in local institutions, shared practices, experiences and values is essential in understanding how (neoliberal) policies advocated by national governments are mediated
- What exists at the local level shapes and limits what policy can be expected to do. And when policy contradictions emerge, it is not clear that the 'neoliberal' moment will have any "solutions" or even be ascendant in any reshaping of policy.
- Floods knowledge is not on a fixed unidirectional trajectory towards perfection but is imperfect, discontinuous and disputed.

One of the benefits of recent events may prove to that ***we are at least starting to admit more openly to what we don't know!***

Winchcombe Flood