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Dear Colleague

I hope this finds you well.

Please find attached the Red Cross submission to the evidence call for scrutiny of the Water, Sustainable Drainage and Flood Management Bill. We would be delighted to provide more information on all points made in the submission, should that be helpful.

I trust this is in order. If you need any further information, please do get back to me.

Kind regards

Jonna

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Water, Sustainable Drainage and Flood Management Bill

Committee for Infrastructure

Submission by the Red Cross

November 2025

1. Introduction

The British Red Cross welcomes the opportunity to contribute evidence to this Bill. We have supported communities both during and after extreme weather events such as Storm Eowyn in 2025 and Storm Darragh in 2024, and during other flooding events across the region in recent years. We understand the devastating practical and emotional impact of the floods on communities and people, and have also developed tools that help communities build preparedness and resilience. We see first hand how emergencies disproportionately affect people in the most vulnerable situations, and our research confirms this.

UK wide, the Red Cross responds to an emergency every four hours. This includes storms, floods and extreme weather events, and we have extensive experience of working with communities to identify effective solutions, both in the immediate and longer term. We focus on human centred, locally tailored and efficient emergency preparedness, including prevention, preparation and response, and support first responders. We also work alongside first responders, and have developed strong relationships as well as a clear understanding of the resilience framework in Northern Ireland.

We welcome the Bill as an important piece of legislation that will contribute to resilience and emergency preparedness in Northern Ireland. Our expertise relevant to the Bill relates to flood preparedness, response and recovery at household and community level, and our comments will focus on this element of the Bill covered in Articles 6-7.

2. Key recommendations

We recommend that:

- The legislation – specifically clauses 6 and 7 - should adopt the widest possible approach to flood protection grants, ensuring that eligibility is based on flood risk rather than property tenure or ownership status. This will enable all households at greatest risk - whether owner-occupied, privately rented, or

social housing - to take timely action to protect their homes. This can be achieved by retaining clause 6 of the Bill in its current form.

In addition, we welcome the following elements of the Bill:

- A strengthened approach to flood risk assessment, through the clearer powers and regulation of assessment approaches proposed in the Bill. This is vital to assist in prevention and preparation, and reduce risk to communities.
- Clear regulation of SuDS systems, which is essential to ensuring an effective, consistent and equitable approach across housing developments and communities in Northern Ireland.

3. Key messages

This submission highlights the opportunity for the Bill to adopt a tenure-neutral approach to flood protection, ensuring support reaches those most at risk - whether homeowners or tenants. Widening access will strengthen community resilience, reduce displacement and recovery costs, and set a leading example of how to tackle inequalities while enabling households least able to self-fund protective measures to prepare effectively for floods and extreme weather.

Key messages from our research and operational expertise demonstrate the importance of putting those at greatest risk, including those experiencing socioeconomic disadvantage, at the heart of flood preparedness:

- People most at risk in a flood are often also most vulnerable: targeting protection grants and support to those with limited resources will reduce this inequality and prevent harm
- Specifically, tenants are affected differently from home owners, with typically less opportunity and less income to take preventative action.
- Those on the lowest incomes are hardest hit in floods; many can't afford insurance and often face long displacement, with financial and health impacts
- Health issues, digital exclusion and digital literacy issues, as well as language barriers also limit capacity to prepare; however, these issues often coincide with socioeconomic deprivation and lack of resources.
- People in social or low income private rented accommodation tend to face the most significant barriers, including lack of resources as well as relying on landlords to take property level action
- 72% of tenants responding to our 2024 survey reported being prevented from altering the property in any way.

Financial implications: Insurance and affordability of prevention key issues

UK wide, flooding costs an estimated £2 billion per year. In 2020, insurance claims for flooding following major storms averaged £32,000 per household, not accounting for

additional disruptions to daily life, work, and education.¹ While large scale flood defences continue to play a role in flood management, this highlights that strengthened property level flood resilience can also play a significant role to reduce overall risk and cost to society as a whole, including the public purse as well as insurers. However, our *Vulnerability and Resilience* report² shows that at a UK level, only 10% of homeowners have taken action to flood proof their home. In the same survey, 15% reported wanting to do so, but finding it difficult to afford measures, find suppliers and/or manage the process. Most notably, the majority of home owners don't know about available measures, or don't think they need to do anything as they estimate their risk as low.

Role and limitations of current Property Flood Resilience measures

Property flood resilience (PFR) includes a wide range of measures, such as flood doors and automatic air bricks, which work to reduce the risk of flood water entering properties, and limit damage in the event of severe flooding. Installing PFR measures can, however, involve considerable preparatory work including property surveys and assessments, and findings from the *Vulnerability and Resilience* report also highlight that rising living costs are making it harder for households to finance Property Flood Resilience (PFR) measures. People in social rented housing and low income private rented accommodation find this particularly challenging, as they are most likely to struggle to make ends meet; in addition, in many cases landlords limit tenants' ability to alter a rental property.

This demonstrates the importance of a statutory flood protection grant scheme, and we welcome the proposals in the Bill to put the scheme on a statutory footing, as the first statutory scheme in the UK. As noted above, we urge for the scheme to be tenure-neutral, as this allows for support to be targeted to those most in need, while also reducing harm and associated additional demand on public services. This can be achieved by maintaining the current wording in clause 6 of the Bill.

Impact of socioeconomic disadvantage: compounded vulnerability

The central finding from our research is that not all households are equally able to take action. People in more deprived areas are particularly likely to lack resources to take protective measures, while 72% of people in social housing or private tenancies reported they are not able to alter the property in any way, because they don't own it. This underlines the role of landlords, and highlights the issue of financing resilience in the social and private rented sector.

The issue of deprivation and affordability is relevant in Northern Ireland, as elsewhere. Our research on social vulnerability to floods, published in *Every Time It Rains* (2022), shows that higher flood risk and higher socioeconomic deprivation often coincide in Northern Ireland: 25% of areas at highest flood risk are also among those experiencing

¹ BBC News. (2020). Storm payouts average out at £32,000 per household. Retrieved from <https://www.bbc.co.uk/news/business-51773037>

² British Red Cross (2024) [Vulnerability and Resilience](#)

higher socioeconomic deprivation. This is particularly the situation in Belfast, many parts of which are at risk of pluvial, fluvial and coastal flooding.

In addition, it is notable that people living in more deprived areas are less likely to be able to afford comprehensive insurance: our *Vulnerability and Resilience* report shows that at a UK level, one in eight households are uninsured, or underinsured, with those living in deprived areas significantly more likely to lack insurance. Our operational insights indicate that there is a concrete link to low income and poverty, with many households lacking any savings for unexpected costs. Recently, our operational teams assisted a household which had previously had insurance, but had been unable to renew it as they needed a new washing machine. This demonstrates a key mechanism how people less able to afford insurance covering flood damage are left especially vulnerable to the substantial costs of flood recovery, including repairs to their home, replacement of possessions and temporary accommodation. This, in turn, increases the risk for long term health impacts, as well as homelessness.

2. Learning from our work on emergencies and flooding

Crisis and emergency response is one of the core areas of work for the Red Cross in Northern Ireland. We coordinate emergency response teams across Northern Ireland, with three volunteer led teams based in Belfast, the North West and the South West. Teams liaise closely with the NI Fire and Rescue Service (NIFRS) and deploy on request of NIFRS, in line with our role as auxiliary to government; our teams also have access to a rescue vehicle at each hub. We respond to a wide range of events from extreme weather and floods to agricultural events and threats to life, providing practical and psychosocial support. In 2024, we responded to 212 events, assisting 329 people.

In early 2025, the Red Cross contributed to the relief effort after Storm Eowyn, which included extended assistance to communities and households affected by prolonged power and Internet access outages. While review of Storm Eowyn remains ongoing, initial evidence from those affected highlighted practical as well as emotional impacts from the storm, including from managing sometimes very difficult situations such as caring for vulnerable people, caring for livestock or running businesses without electricity, broadband access and in some cases facing considerable damage. It highlighted that people who might not have been initially at risk in the immediate response, became at risk due to the prolonged impacts, needing support for food and medicine for example.

Potential impact of protection schemes integrating vulnerability

Our experience in working with local communities underlines that many people have limited awareness of their risk to emergencies such as extreme weather and floods. Many people believe, among other things, that they are not at risk living on a hill, and even more people are unaware of practical actions, such as knowing how to get warnings, access sandbags, or ensure household essentials are protected.

As described above, we also see the long term impacts of lack of preparedness, and the practical and financial costs to those affected, which are additional to the health and wellbeing impacts on people and communities affected. On the basis of this experience, we believe that a statutory flood protection grant scheme can play a major part in strengthening flood preparedness and resilience.

However, it is essential the legislation, and subsequent subordinate legislation, integrates vulnerability as a criterion and offers protection to the widest possible group of households at risk, to ensure the most effective preparation and prevention is available to support communities build resilience. Our research consistently shows that those on the lowest incomes, and in particular low income tenants in social housing, typically are hit the hardest. Often, these households also face other barriers including health, language and digital inclusion issues, which create a compound, intersectional impact that serves to increase challenges for tenants to take effective action to protect themselves and their properties.

3. Learning from our research

We have documented the impact of flooding on people, households and communities in a series of reports, including the Northern Ireland focused reports *Living in Fear of the Rain* (2010) and *Cut Off by the Floods* (2012), as well as the UK wide reports [Every Time It Rains](#) (2022) and [Vulnerability and Resilience](#) (2024), both of which include Northern Ireland specific evidence and recommendations. All reports recommend strengthening property level flood protection, as well as increasing uptake and understanding of emergency preparedness information, and working with communities on preparedness, involving the voluntary and community sector that often plays a key role in local relief and response efforts.

It can also be noted that the extensive UK Public Survey of Risk Perception, Resilience and Preparedness, undertaken by the UK government through the Cabinet Office and the Department for Environment, Food and Rural Affairs in July 2025, reflects similar findings³. In this survey, 32% of respondents in Northern Ireland felt that they were likely to be affected by flooding severe enough to force people to leave their homes in the next two years; 79% thought a storm severe enough to cause injuries or disruption would occur.

Meanwhile, 41% thought the impact of flooding would be severe, should they personally be affected. However, while 67% of respondents said they were capable of taking action, just over half (55%) said their household was slightly or not at all prepared; this survey did not ask for reasons, but our research indicates that affordability is a key issue, while almost half of respondents to our 2024 survey⁴ felt

³ Cabinet Office (July 2025) [UK Public Survey of Risk Perception, Resilience and Preparedness 2025](#)

⁴ British Red Cross (2024) [Vulnerability and Resilience](#)

available advice is not relevant to them. Tenants are typically unable to alter their home in any way, which is a central barrier and highlights the role of landlords, including NIHE, housing associations and private landlords, in both being aware of risk to their properties and taking action to prevent or reduce risk.

In the UK survey, two thirds (66%) felt their community was slightly or not at all prepared, and almost a third (30%) felt local authorities were not at all prepared for an emergency or disaster. The vast majority (90%) felt the Northern Ireland Executive should have at least a large responsibility for preparedness, while councils (72%) and utilities (80%) should have large responsibility; only 29% households should have main responsibility.

Local impacts: Lack of preparedness compounds damage

Our *Cut Off by the Floods* report (2012) highlights rural communities as a specific vulnerable category, as many rural communities are at risk of being completely cut off from critical services, through flood damage to roads and critical infrastructure. In the flooding in 2010-2011 in Fermanagh, for example, communities were cut off from basic services, including access to employment, schools, healthcare, and experienced difficulties with basic everyday needs such as access to a food shop, pharmacies and post for several weeks. The *Living in Fear of the Rain* report (2010), which focuses on floods in Belfast in 2007-09, shows that most people affected did not think they were at risk, which affected preparedness and meant that many people faced significant damage, with long lasting practical and emotional impacts as a result.

Our role in supporting community resilience

The North West Flooding Review⁵ undertaken by The Executive Office and the Department for Infrastructure following the 2017 flooding recommended a holistic response to meeting the complexity of needs after flooding events. These needs included the need for emotional health and wellbeing support, on which the Red Cross was tasked to work with Department of Health to develop guidance and a framework. As a member of the RCRG, the Red Cross co designed the "Community Resilience in Urban Areas" toolkit, an accessible guide to help communities better understand their risks of flooding and to improve their preparedness for the future. The Toolkit has been adopted by RCRG as an approved methodology and a number of pilots have been undertaken, highlighting positive outcomes for community cohesion, capacity and emergency preparedness. The toolkit is now also informing good practice elsewhere in the UK. This work highlights the contribution voluntary and community sector organisations can make to supporting regional emergency preparedness mechanisms, as well as building community capacity and resilience to emergencies.

Health impacts: a main concern for individuals

⁵ The Executive Office and Department for Infrastructure (2018) [North West Flooding Review](#)

Both the *Living in Fear of the Rain* and *Every Time It Rains* reports show that people who have experienced a flood frequently experience longer term mental health symptoms, and anxiety about being flooded again. This is one of the most significant impacts of flooding, and has concrete impacts on the health and wellbeing of those affected, as well as health services in affected areas.

Losing memories: losing identity

Our research includes examples where children and entire families worry about being flooded again on an ongoing basis, and experience major anxiety when it rains heavily. This includes symptoms such as losing sleep or being unwilling to leave home, in case a flood hits and families become separated from each other and valued possessions. In particular losing memorable items is linked to longer term mental health impacts; our research reflects the profound grief people experience losing irreplaceable items such as objects belonging to late family members. This is compounded where families are unable to participate in the clearing up process to salvage such items, which also increases feelings of loss of control and identity.

Insurance and health: those most at risk hardest hit

The *Vulnerability and Resilience* report, which is based on polling with 2,000 people across the UK, shows that 40% of people affected by flooding experience emotional and mental health impacts. Most people recover over time, but for some people, impacts remain and affect long term mental health. Loss of items with sentimental value is often a key factor, and deepens fear for the future, while displacement and dealing with service providers and insurers also contributes to health impacts. Those without insurance, who tend to be people in more deprived areas and tenants rather than homeowners, often experience more stress than those who are insured, although our research indicates experiences of support from insurers vary.

People without insurance also tend to be displaced for longer, which has a direct impact on their health and wellbeing and can increase the risk for long term health complications. Our research indicates that uninsured households also are more likely to be placed in unsuitable housing, and usually separated from their local community and support networks, which further exacerbates health and wellbeing impacts. In some situations, people without insurance may remain in the damaged property, which creates its own health and safety risks. Participants in our research have highlighted, in particular, that damp properties often are affected by mould, and this worsens existing health issues, and can in itself lead to poor health. Our findings emphasise that prevention and preparedness are central to limiting practical and emotional harm at household level, and we urge consideration of the full impacts of flooding on individuals and households as a basis for the Water, Sustainable Drainage and Flood Management Bill. This, in turn, is important at community level, as our research indicates that individual and household level damage, displacement and stress, as well as individual responses and recovery processes, can affect relationships within communities and create tensions.

An inclusive way forward: Ensuring access to support for all population groups

Our key recommendation to help communities build resilience to flooding, supported by consistent evidence across the UK and across research reports^{6 7 8 9}, is to ensure that more properties at risk can be physically protected from flooding, regardless of tenure. Specifically, we are urging for property level flood protection grant support to be made available to social landlords, and to explore options for private landlords with properties in identified flood risk areas. This would significantly reduce anxiety and emotional harm for people on the lowest incomes living in flood risk areas, and would also reduce the risk to property owners and landlords, in particular controlling insurance costs and therefore pressure on rents. In addition, this would benefit statutory agencies by reducing the need to find temporary housing for people without insurance displaced by flooding, as well as reducing risks of homelessness and destitution, which carry significant cost to statutory services across sectors.

We are aware that a statutory flood protection grant scheme will require regulations, and additional consultation on the specific arrangements of a future scheme. We are also aware that the scheme currently available in Northern Ireland is aimed at home owners only, while the Bill includes a broad reference to a 'property flood protection grant scheme'. We are urging the Committee to maintain this open wording, as a prerequisite for further consideration of the specific nature of a future scheme. We also urge the Committee to explore the potential benefits of widening access to the scheme to social landlords and private landlords with properties in high flood risk areas, and to recommend that the Department for Infrastructure undertake further work in this regard.

Additional comments: Flood risk management and SuDS arrangements

In addition to our work on flooding, we have undertaken research into heat events, which while relatively new to Northern Ireland, are expected to become an increasingly frequent occurrence across the UK. Our report highlights that the majority of people live in properties where they have limited capacity to cool their homes, and underlines the importance of external spaces to safeguard the health and wellbeing of people, which is at risk during heat events. In particular people with specific vulnerabilities due to health issues, age or disability are often unable to effectively cool their homes. In this regard, access to green spaces has been highlighted as an important solution to protect people, as well as offer a mechanism for reducing heat island and similar effects. This can be achieved through comparatively small spaces, including the types

⁶ British Red Cross (2022) [Every Time it Rains](#)

⁷ British Red Cross (2024) [Vulnerability and Resilience](#)

⁸ British Red Cross (2010) Living in Fear of the Rain

⁹ British Red Cross (2012) Cut Off by the Floods

of spaces proposed for SuDS schemes in the Bill and in the consultation on SuDS in new housing developments.

In this context, we also support proposals to widen use of SuDS, as a mechanism with multiple benefits in relation to sustainable neighbourhoods as well as extreme weather. We urge the Committee to explore options for mainstreaming SuDS as a nature based solution to drainage issues, flood risk as well as heat, with a focus on both future and climate proofing developments and communities. In particular, we urge the Committee to engage with communities with lived experience of flooding to understand how runoff affects different environments. This can provide concrete insights to complement technical information, and help identify how options can be effectively integrated into existing systems, as well as integrated as standard into new developments.

Finally, we support the proposals in the Bill to clarify and strengthen flood risk assessment. A clear framework integrating forecasting and projecting future risk is vital to inform spatial planning and development, and manage flood risk over time. In addition, ongoing flood risk assessment is important to provide up to date information and advice to authorities and service providers. Specifically, it would be helpful to explore how flood risk assessment and management relates to emergency preparedness information and locally tailored advice for residents.

Northern Ireland currently has no flood alert system that residents can subscribe to, unlike England, Scotland and Wales. This means that residents must rely on their own activity and weather forecasts to assess risk during wet spells or extreme weather events, which creates risk for inequalities and differential outcomes, depending on factors such as individual capacity and capability. As our research repeatedly highlights the increased vulnerability of people experiencing other vulnerabilities during floods and extreme weather events, this is an area that would benefit from further action and clarification. We would urge the Committee to highlight these issues, with a view to further addressing concerns in any future regulations and associated consultation processes.

For further information, please contact Jonna Monaghan, Policy and Public Affairs Manager (Devolved Nations) at jonnamonaghan@redcross.org.uk.