

# Norfolk County Council

## Record of Individual Cabinet Member Decision

**Responsible Cabinet Member: Cllr Eric Vardy (Cabinet Member for Environment & Waste)**

**Background and Purpose:**

On 25 October 2023, the Government announced that the Flood Recovery Framework (FRF) would be activated for local authorities that have been significantly impacted by Storm Babet.

The support included Community and Business Recovery Grants, Council Tax Discounts and Business Rates Relief, all of which are being administered by the relevant District Councils.

In addition, Defra also announced that Property Flood Resilience (PFR) scheme grants of up to £5,000 will be made available to eligible local authorities to help homes and businesses to become more resilient to flooding by helping to pay for a range of property improvements.

To be eligible for the Defra PFR scheme there must be 50 or more properties affected by internal flooding between 19 October 2023 and 25 October 2023 within the County area.

Over 100 properties across the County have been confirmed as flooded internally. Verification of flood events for the Defra PFR scheme will continue until 25 January 2024.

**Decision: To agree to administer the Defra Property Flood Resilience Repair Grant Scheme**

**Is it a key decision?** No

**Is it subject to call-in?** Yes

**If Yes – the deadline for call-in is:** 4pm, Thursday 21 March 2024

**Impact of the Decision:**

Norfolk County Council will be responsible for administering the Defra PFR scheme. This will include providing guidance to eligible property owners with details of qualified surveyors and installers, approved resilience measures and application forms. NCC will also be responsible for verifying the eligibility of applications and the quality of work undertaken.

A review panel will assess the application forms, agree the proposed works. and ensure value for money. Applicants should be informed of the decision in good time.

The expectation is that the applicant will make arrangements and enter contracts with external contractors. NCC is not expected to undertake the work or contract directly with external contractors.

**Evidence and reason for the decision:**

Due to its experience in flood risk mitigation projects, which include property level resilience and resistance measures, NCC as the Lead Local Flood Authority (LLFA) is best placed to administer the Defra PFR Grant Scheme

**Alternative options considered and rejected:**

The relevant District Councils could administer the Defra PFR Grant Scheme for properties in their respective areas. However, it was considered that the LLFA is best placed to administer this scheme.

The LLFA has an existing programme of PFR schemes across the County, funded through the Environment Agency and properties affected by Storm Babet could be included in future phases of these schemes. However, these schemes are over-subscribed, have much tighter rules on eligibility and levels of flood protection and take longer to deliver due to the more involved processes required.

**Financial, Resource or other implications considered:**

Over 100 properties across the County have been confirmed as flooded internally. If the majority of these property owners apply for the PFR grant the scheme will involve transfer of funding in the region of £500,000 over 18 months.

Payment from Defra to NCC will only be made once the work has been completed for each property. There will be no payments made for partial or incomplete work. Any costs incurred above the £5,000 per property grant will not be paid. The Grant is intended as a contribution and may not cover all costs involved.

NCC must put in place audit arrangements to ensure that the Grant is used for its intended purpose.

All installation works must be complete by 06 May 2025 and all invoices to Defra must be submitted by 01 August 2025. Within this time property owners must arrange independent surveys and employ contractors to carry out the works. Property owners can only use contractors that have completed the CIWEM Property Flood Resilience Industry Training. Storm Babet affected many council areas across the country and 1000s of properties, all of which will be wanting to use the grant scheme to protect their homes within the same very tight timescales. Resource that is suitably qualified within the industry may not be able to keep up with demand.

Defra will not reimburse for the £500 stand-alone survey costs if installation works are not completed and will not pay for ineligible properties or ineligible flood resilience measures. It is essential that the panel reviewing applications does so in accordance with the guidance or in agreement with Defra to avoid any financial losses.

It is unlikely that all properties that receive the PFR grant will be fully protected from flooding unless the property owner is able to pay for or future schemes provide extra measures. However, properties will be more resilient to flooding. Communications will need to be very clear on the limitations of the funding and the potential for repeat flooding.

There is no additional funding given by Defra for resource allocation within Local Authorities. Resource from the Communities and Customer Service Section will administer the scheme under supervision of the Flood & Water Team.

**Record of any conflict of interest:**

None identified

**Date of Decision: 14 March 2024**

**Publication Date of Decision: 14 March 2024**

**Signed by Cabinet Member:**

I confirm that I have made the decision set out above, for the reasons also set out.

**Signed:** 

**Print name:** Cllr Eric Vardy

**Date:** 14 March 2024

**Accompanying documents:**

- Appendix A: Defra Guidance Oct 23 Final

Once you have completed your internal department clearance process and obtained agreement of the Cabinet Member, send your completed decision notice together with the report and green form to [committees@norfolk.gov.uk](mailto:committees@norfolk.gov.uk)

# Individual Cabinet Member Decision Report

Item No:

**Report Title: Storm Babet 2023 - Property Flood Resilience Repair Grant Scheme**

**Date of Meeting: N/A**

**Responsible Cabinet Member: Cllr Eric Vardy** (Cabinet Member for Environment & Waste)

**Responsible Director: Grahame Bygrave** (Interim Executive Director of Community and Environmental Services)

**Is this a Key Decision? No**

**If this is a Key Decision, date added to the Forward Plan of Key Decisions: DD Month YYYY**

## **Executive Summary / Introduction from Cabinet Member**

The Government announced on 25 October 2023 that the Flood Recovery Framework (FRF) would be activated for local authorities that have been significantly impacted by Storm Babet. The support includes Community and Business Recovery Grants, Council Tax Discounts and Business Rates Relief which are administered by the District Councils.

In addition, the Department for Environment, Food and Rural Affairs (Defra) also announced that a Property Flood Resilience (PFR) scheme grants of up to £5,000 will be made available to eligible local authorities to help homes and businesses to become more resilient to flooding by helping to pay for a range of property improvements. The outcome from this funding should be that if flooding were to reoccur, damage levels would be considerably lower, and property owners and businesses could return to their properties much more quickly.

Norfolk County Council has agreed and returned the Memorandum of Understanding (MOU) for the PFR grant scheme. The MOU is not legally binding but the Parties must intend to honour their obligations set out in it. By returning the MOU, this enables the Council to access additional national Defra funding to help property owners protect their homes from future flooding. Therefore, this will directly help Norfolk residents and businesses and improve future flooding resilience.

## **Recommendations:**

- 1. Agree to support and administer the Defra Property Flood Resilience Repair Grant Scheme for Norfolk.**

## **1. Background and Purpose**

- 1.1** Heavy, persistent and widespread rain affected much of the UK from 18 to 20 October 2023, with 100mm falling fairly widely. This was the third-wettest independent 3-day period for England and Wales in a series from 1891, while the Midlands provisionally recorded its wettest 3-day period on record. This rain came on top of very wet weather earlier in October with some central and eastern parts of England and Scotland recording more than twice the October whole-month average rainfall in the first three weeks of the month.

Over 1,000 homes in England were affected by flooding. In Suffolk, a major incident was declared due to flooding. Rail services on the East Coast were severely affected due to flooded lines and Kings Cross station in London was temporarily closed due to concerns with overcrowding. Other rail services in Scotland and northern England were cancelled or severely disrupted.

- 1.2** In Norfolk, the Fire and Rescue Service received almost 200 calls and attended 55 flood related instances, some of which involved multiple appliances, for flooded properties and vehicles stuck in flood water.

In addition, the County Council received over 400 further calls relating to flooding and drainage issues. The local Highways Maintenance teams responded by clearing any gullies or drainage assets which became silted and removing build-up of debris on the highway. In some cases, temporary road closures were necessary, which were also required by National Highways, such as on the A47 trunk road between Mattishall and Easton.

- 1.3** The Council's Flood & Water Team is currently investigating the incidents of flooding caused by Storm Babet and subsequent rainfall events. Site visits have taken place in the majority of affected locations, and there is a concentration of reports from around the Attleborough and Besthorpe areas.

Over 100 properties across the County have been confirmed as flooded internally. Verification of flood events for the Defra Property Flood Resilience Repair (PFR) scheme continued until 25 January 2024.

- 1.4 To be eligible for the Defra PFR scheme there must be 50 or more properties affected by internal flooding between 19 October 2023 and 25 October 2023 within the County area.

## **2. Proposal**

### **2.1 The PFR Repair Grant Scheme:**

The purpose of the Scheme is to assist property owners to improve the flood resilience of their individual properties when they repair them after a flood. The outcome from this funding should be that if flooding were to reoccur, damage levels would be considerably lower, and property owners and businesses could return to their properties much more quickly.

This grant is not compensation for flood damage, nor is it to be used for speculative work.

Up to £5,000 inclusive of Value Added Tax (VAT) is available per property to make their homes more flood resilient. There is no requirement for the application to be for the full £5,000 amount.

Up to £500 of the total grant money can be used to fund the cost of a survey. Any cost above £500 would need to be met by the property owner. The cost of the survey will only be reimbursed by Defra as part of a full and complete application to the Grant Scheme. Speculative surveys where no work is then carried out, and where the applicant does not receive the Grant will not be refunded. Defra will not reimburse for stand-alone survey costs. No funding will be reimbursed if works are not completed.

### **2.2 The following are considered eligible properties under this scheme:**

Residential properties (including accommodation such as static caravans where this is the primary residence, defined as a location registered on the electoral role) where habitable internal areas of the premise have been damaged by flooding by the relevant event.

Businesses (including social enterprises), charitable organisations and educational establishment properties where internal areas of the premises which are critical to the day-to-day operations (i.e. not storage sheds or warehouses) have been damaged.

Holiday lets that are operated as a business and where non-domestic rates are paid.

Bed and Breakfast properties where:

- i. the owner lives on site and said property is their principal residence and;
- ii. they may pay both domestic and non-domestic rates.

### 2.3 Insurance:

Home insurance policies generally put properties back to the state they were in prior to flooding. This should mean that those properties previously adapted should be able to secure repairs to any sacrificial or removable elements from their home insurer. The Grant must not be used for costs that should be covered by home insurance or product guarantees.

Many insurers are now offering 'Build Back Better' (BBB) payments. This means that households can claim an additional amount as part of their flood claim, which will fund measures which will improve the flood resilience of the property. This can include carrying out surveys to understand the flood risk and potential mitigation, the addition of flood resistance measures such as flood doors, and flood resilience measures such as the replacement of damaged parts of the home with more flood resilient materials such as hard floors. People who have BBB as part of their insurance claim can apply to have a PFR grant but it is recommended that customers engage with their insurers in the first instance where they are eligible for BBB.

## 3. Impact of the Proposal

- 3.1 While Local Authorities will not be expected to undertake the repair work or contract directly with external contractors, including surveyors, Local Authorities will be responsible for verifying the eligibility of applications and the quality of work undertaken. Accordingly, Local Authorities should only accept such project plans where they are satisfied with their quality and the independence and competence of the person conducting the survey.
- 3.2 The County Council will provide guidance to eligible property owners which will include details of qualified surveyors and installers, approved resilience measures and application forms.

Applications can be accepted from the property owner and/or anyone acting on their behalf including but not limited to third parties and insurance companies.

A review panel will assess the application forms, agree the proposed works. and ensure value for money. Applicants should be informed of the decision in good time.

The expectation is that the applicant will make arrangements and enter contracts with external contractors. Local Authorities are not expected to undertake the work or contract directly with external contractors.

Local Authorities will need robust processes in place to administer the Scheme and to carry out risk-based inspections to check the quality of PFR work and to assist applicants to follow-up cases of poor workmanship.

It is the role of the Local Authority to put in place audit arrangements to ensure that the Grant is used for its intended purpose are responsible for making sure the same property does not receive a PFR Grant twice.

- 3.3 Once payment from Defra has been received it should be issued following the Local Authorities' normal internal practices for paying money. This should be done as soon as is practical. Defra sets no restrictions for who the money should be paid to, e.g., if an applicant has requested it is paid straight to a contractor, this is at the Local Authorities discretion.

## **4. Evidence and Reasons for Decision**

- 4.1 On 25 October 2023, the Government announced that the Flood Recovery Framework (FRF) would be activated for local authorities that have been significantly impacted by Storm Babet. This includes Norfolk and the Council has already confirmed to Defra that it wishes to join the scheme. This enables the Council to access additional Defra funding to help property owners protect their homes from future flooding.

The wider Defra support also included Community and Business Recovery Grants, Council Tax Discounts and Business Rates Relief, all of which are being administered by the relevant District Councils.

- 4.2 In addition, Defra also announced that PFR scheme grants of up to £5,000 will be made available to eligible local authorities to help individual homes and businesses to become more resilient to flooding by helping to pay for a range of property improvements.

Due to its experience in flood risk mitigation projects, which include property level resilience and resistance measures, the Council as the Lead Local Flood Authority (LLFA) is best placed to administer the Defra PFR Grant Scheme

## **5. Alternative Options**

- 5.1 The relevant District Councils could administer the Defra PFR Grant Scheme for properties in their respective areas. However, it was considered that the LLFA is best placed to administer this scheme.



- 5.2 The LLFA has an existing programme of PFR schemes across the County, funded through the Environment Agency and properties affected by Storm Babet could be included in future phases of these schemes. However, these schemes are over-subscribed, have much tighter rules on eligibility and levels of flood protection and take longer to deliver due to the more involved processes required.

## **6. Financial Implications**

- 6.1 Over 100 properties across the County have been confirmed as flooded internally from Storm Babet. If the majority of these property owners apply for the PFR grant the scheme will involve transfer of funding in the region of £500,000 over 18 months.

Once payment from Defra has been received it should be issued following the Local Authorities' normal internal practices for paying money. This should be done as soon as is practical. Defra sets no restrictions for who the money should be paid to, e.g., if an applicant has requested it is paid straight to a contractor, this is at the Local Authorities discretion.

- 6.2 Payment from Defra to the Local Authority will only be made once the work has been completed for each property. There will be no payments made for partial or incomplete work. Any costs incurred above the £5,000 per property grant will not be paid. The Grant is intended as a contribution and may not cover all costs involved.

Funds will be provided as grants paid under Section 31 of the Local Government Act 2003 and will be based on the number of completed properties.

There are seven invoicing periods between 01 February 2024 and 01 August 2025. Invoices sent outside of the invoicing period (without prior agreement) will not be paid.

Invoices require the sign-off by the relevant Section 151 Officer under the Local Government Act 1972.

## **7. Resource Implications**

### **7.1 Staff:**

There is no additional funding given by Defra for resource allocation within Local Authorities. Defra recommend that a combination of staff skills are utilised to administer this grant, from both flood experts, those on the ground and admin and financial staff.

The review panel will consist of officers from the Council's Flood & Water, Resilience and Finance Teams, along with representatives invited from relevant District Councils and the Environment Agency

The administration of the scheme will be delivered through existing staff resource within the CES Department.

## **7.2 Property:**

Local Authorities that are landlords can apply for this grant assuming the same eligibility criteria are met. It is important, however, for the Local Authority to treat their applications in the same way as applications for private premises and to show clear audit trails for how the application is processed in case of future audit.

## **7.3 IT:**

None identified

# **8. Other Implications**

## **8.1 Legal Implications:**

It is the role of the Local Authority to put in place audit arrangements to ensure that the Grant is used for its intended purpose.

The Scheme should be accompanied by risk-based checks on properties to ensure measures agreed and funded have been carried out. Local Authorities should include an anti-fraud statement in scheme materials and reserve the right to conduct a full audit.

Local Authorities are responsible for making sure the same property does not receive a PFR Grant twice (unless in exceptional circumstances) and should use their own internal audit processes to make sure this doesn't happen.

The National Audit Office (NAO) carries out audits and reports results to Parliament, to help to hold government departments and other bodies to account for how they use public money. This safeguards taxpayers' interests. As part of their oversight duty, the NAO may decide to carry out spot checks on both Defra and Local Authorities. This may require short notice information be provided by Local Authorities to Defra to comply.

All invoices to Defra must be signed by the relevant Section 151 Officer under the Local Government Act 1972.

## **8.2 Human Rights Implications:**

None identified

## **8.3 Equality Impact Assessment (EqIA) (this must be included):**

The eligibility criteria and process for delivering the PFR Grant Scheme is set by Defra. All property owners who have been flooded by Storm Babet will be eligible for the PFR grant of £5,000 inclusive of Value Added Tax (VAT).

However, the scheme requires the property owner to fund an independent survey and only allows for £500 of the total available grant to be used for this purpose. Where survey costs are in excess of £500, these would need to be met by the property owner. Additionally, Defra will not reimburse for stand-alone survey costs if installation works are not completed.

Defra will not fund flood resilience measures in excess of £4,500 and these costs would also need to be met by the property owner.

This creates the risk that either property owners are unable to afford to make use of the scheme or that they only use it up to the available funding and limit the resulting measures that fall short of making the property fully resilient to future flooding.

Property owners will still be able to seek support from their insurers and apply for other grant funding if measures over the £5000 are unaffordable. Local Authority payments for completed installation works may be paid directly to the contractors where necessary.

Insured and uninsured properties are equally eligible for the Grant.

#### **8.4 Data Protection Impact Assessments (DPIA):**

Existing NCC data protection and GDPR guidelines will be followed.

#### **8.5 Health and Safety implications (where appropriate):**

All contractors employed in the scheme must have completed the Chartered Institute of Water and Environmental Management (CIWEM) Property Flood Resilience Industry Training. Those completing the required training and demonstrating relevant industry experience can become a 'Certified Professional' in the delivery of flood resilience measures in accordance with the Code of Practice for PFR.

The Property Flood Resilience Code of Practice (CoP) is concerned with PFR measures that can be introduced to buildings at risk from flooding. The Code covers both flood resistance – measures which can help prevent water from entering properties – and flood resilience, which help to limit the damage that floods cause. The CoP includes six standards that specify what should be achieved. There are a range of British standards covering flood resilience which are covered in the CoP.

#### **8.6 Sustainability implications (where appropriate):**

The intention of the Defra PFR Grant Scheme is to help protect communities and businesses from the harmful effects of flooding, taking into account the extra challenges of climate change such as more frequent extreme rainfall events.

**8.7 Any Other Implications:**

None

**9. Risk Implications / Assessment**

- 9.1 All installation works must be complete by 06 May 2025 and all invoices to Defra must be submitted by 01 August 2025. Within this time property owners must arrange independent surveys and employ contractors to carry out the works. Property owners can only use contractors that have completed the CIWEM Property Flood Resilience Industry Training. Storm Babet affected many council areas across the country and 1,000s of properties, all of which will be wanting to use the grant scheme to protect their homes within the same very tight timescales. Resource that is suitably qualified within the industry may not be able to keep up with demand.
- 9.2 Defra will not reimburse for stand-alone survey costs if installation works are not completed and will not pay for ineligible properties or ineligible flood resilience measures. It is essential that the panel reviewing applications does so in accordance with the guidance or in agreement with Defra to avoid any financial losses.
- 9.3 It is unlikely that all properties that receive the PFR grant will be fully protected from flooding unless the property owner is able to pay for, or future schemes provide, extra measures. However, properties will be more resilient to flooding. Communications will need to be very clear on the limitations of the funding and the potential for repeat flooding.

**10. Select Committee Comments**

- 10.1 Not applicable: this report has not been taken to a Select Committee

**11. Recommendations**

- 1. Agree to support and administer the Defra Property Flood Resilience Repair Grant Scheme for Norfolk.**

**12. Background Papers**

- 12.1 Defra: Property Flood Resilience Repair Grant Scheme Storm Babet 2023 Guidance for Local Authorities

**Officer Contact**

If you have any questions about matters contained within this paper, please get in touch with:

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Department  
for Environment  
Food & Rural Affairs

# Property Flood Resilience Repair Grant Scheme Storm Babet 2023 Guidance for Local Authorities

**November 2023**

This guidance is to be used when an active Property Flood Resilience (PFR) Grant Scheme is running, which will be announced through gov.uk and Resilience Direct.

There is a single point of contact for the PFR Scheme which is:  
[propertyfloodresilience@defra.gov.uk](mailto:propertyfloodresilience@defra.gov.uk)

Please use this e-mail address for all communications to Defra concerning this guidance package and the Scheme.

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# PART 1

## 1. Introduction

- 1.1 Following wide-scale flooding in England in 2015-2016, the Government developed a package of measures that could be deployed following a severe weather event. This is called the Flood Recovery Framework (FRF) and is owned by the Department for Levelling Up, Housing and Communities (DLUHC). This package comprises: a community recovery grant; a business recovery grant; a council tax discounts scheme; and a business rates relief scheme. Ministers will determine whether a flood event is significant enough to warrant government intervention by activating the FRF. Access the FRF at:  
<https://www.gov.uk/government/publications/flood-recovery-framework-guidance-for-local-authorities-in-england>.
- 1.2 Defra's Property Flood Resilience (PFR) Repair Grant may run alongside the FRF. This document provides guidance on how Local, District, Unitary Authorities and Lead Local Flood Authorities (LLFAs) should administer the PFR Scheme locally, to ensure it is effective and consistent. This guidance has been updated following feedback from Local Authorities that have taken part in past schemes and an independent body evaluation completed in 2022.

### What is Property Flood Resilience

- 1.3 Property Flood Resilience refers to any measure that can be applied to a building to make people and property less vulnerable to the physical impacts of flooding. It can help people and property become more resilient to the impacts of flooding and reduce the length of time needed for recovery if flooding were to re-occur, however there is always a residual risk that people and properties will still be flooded.
- 1.4 The Construction Industry Research and Information Association (CIRIA) has published a Code of Practice on Property Flood Resilience, found here:  
<https://www.ciria.org/ItemDetail?iProductCode=C790F&Category=FREEPUBS>

### The PFR Repair Grant Scheme

- 1.5 The purpose of the Scheme is to assist property owners to improve the flood resilience of their individual properties when they repair them after a flood. The outcome from this funding should be that if flooding were to reoccur, damage levels would be considerably lower, and property owners and businesses could return to their properties much more quickly.



- 1.6 Up to £5,000 inclusive of Value Added Tax (VAT) is available per property to make their homes more flood resilient (see Section 2: Local Authority Eligibility and Section 3: Scheme Eligibility for Properties).
- 1.7 The Grant should always represent good value for money and good use of taxpayer money to protect properties or allow them to recover more quickly from future flooding.
- 1.8 The Grant is available to improve the flood resilience of a property, **no money will be reimbursed if works are not completed.** This grant is not compensation for flood damage, nor is it to be used for speculative work. It is for improvements to a property to reduce future flood damage. Only fully completed works that improve the flood resilience of a property will be reimbursed.

## 2. Local Authority Eligibility

- 2.1 Local Authorities must have been affected by Storm Babet between **19<sup>th</sup> October 2023 and 25<sup>th</sup> October 2023**.
- 2.2 LLFAs must have had 50 or more properties affected by internal flooding. Please see further eligibility criteria below for the definition of properties and internal flooding under the Grant.
- 2.3 Local Authorities must have completed a Memorandum of Understanding (MoU) available on Resilience direct or by contacting [propertyfloodresilience@defra.gov.uk](mailto:propertyfloodresilience@defra.gov.uk). This must be returned no later than **Friday 10<sup>th</sup> November 2023** to [propertyfloodresilience@defra.gov.uk](mailto:propertyfloodresilience@defra.gov.uk) to be eligible to participate in the Scheme.
- 2.4 An official from Defra will contact you to confirm this has been received. The MoU sets out the requirements for both the Local Authority and Defra. It is important that the MoU is read, understood, and followed. Any questions should be sent to [propertyfloodresilience@defra.gov.uk](mailto:propertyfloodresilience@defra.gov.uk).
- 2.5 Local Authorities have discretionary powers to run a PFR grant from their own budgets at any time.
- 2.6 Local Authorities who are not eligible for the Defra funded PFR Repair Grant Scheme for whatever reasons are entitled to collaborate with a neighbouring Local Authority to jointly facilitate and administer a local PFR Scheme or run their own independent scheme so long as the grants dispersed by it are paid via its own budget and resources.

### 3. Scheme Eligibility for Properties

- 3.1 Decision making powers lie with Local Authorities as to eligibility, in line with the criteria in this document. Not every situation can be covered by guidance and Local Authorities have the discretion to make decisions on awards. Further help can be sought from Defra at [propertyfloodresilience@defra.gov.uk](mailto:propertyfloodresilience@defra.gov.uk) but the ultimate decision will lie with the Local Authority following the criteria in this guidance.
- 3.2 For the purpose of this guidance, “flood” has the following meaning set out in Section 1 of the Flood and Water Management Act 2010:
- a. “Flood” includes any case where land not normally covered by water becomes covered by water.
  - b. It does not matter for the purpose of subsection (1) whether a flood is caused by:
    - i. heavy rainfall,
    - ii. a river overflowing or its banks being breached,
    - iii. a dam overflowing or being breached,
    - iv. tidal waters,
    - v. groundwater, or
    - vi. anything else (including any combination of factors).
  - c. But “flood” does not include –
    - i. a flood from any part of a sewerage system, unless wholly or partly caused by an increase in the volume of rainwater (including snow and other precipitation) entering or otherwise affecting the system, or
    - ii. a flood caused by a burst water main (within the meaning given by Section 219 of the Water Industry Act 1991).
- 3.3 The following are considered eligible properties under this scheme:
- a. Residential properties (including accommodation such as static caravans where this is the primary residence, defined as a location registered on the electoral role) where habitable internal areas of the premise have been damaged by flooding by the relevant event.
  - b. Businesses (including social enterprises), charitable organisations and educational establishment properties where internal areas of the premises which are critical to the day-to-day operations (i.e. not storage sheds or warehouses) have been damaged.

- c. Local Authorities that are landlords can apply for this grant assuming the same eligibility criteria are met. It is important, however, for the Local Authority to treat their applications in the same way as applications for private premises and to show clear audit trails for how the application is processed in case of future audit.
  - d. Holiday lets that are operated as a business and where non-domestic rates are paid.
  - e. A Bed and Breakfast property where:
    - i. the owner lives on site and said property is their principal residence and;
    - ii. they may pay both domestic and non-domestic rates.
  - f. Houses of Multiple Occupancy (HMOs) should be considered one property, unless they are disaggregated for council tax purposes, in which case each individual council taxpayer will be eligible. Blocks of flats should be treated under the same principles.
  - g. The Grant is only available to people where the habitable living or business area of the properties have been damaged by entry of flood water, necessitating drying out and/or repairs to the fabric of the building.
- 3.4 Only properties, or parts thereof, directly impacted by the flood within multi-occupancy buildings are eligible for the Scheme. As well as owner occupiers, premises occupied through leasehold are eligible. The freehold owner of a flooded building is eligible for a grant from the Scheme to contribute towards the cost of making repairs to the shared spaces of a building impacted by flooding, especially where this compliments work being carried out to individual properties through the Scheme.
- a. E.g. An HMO property containing three bedsits, two on the ground floor and one on the second floor, has been flooded. Flood water reached halfway up the stairs but did not enter the second floor bedsit. The two ground floor tenants and their landlord would be eligible for the Grant as flood water entered the property and damaged living spaces and communal areas (the stairwell). The second-floor tenant is not eligible as flood water did not enter their living space.
- 3.5 Garages, outhouses, and storage areas are not eligible for the Scheme. Second homes are not eligible. Empty homes are not eligible. Basements or cellars not used as part of the habitable or business area of a property are not eligible. A holiday cottage which is not part of a commercial enterprise and is not the principal residence of an owner is not eligible.
- 3.6 Properties that have received the following previous grants are not eligible:
- a. Previous PFR Grants from the schemes that were put in place in 2013/14, 2015/16, November 2019 and February 2020 (exception below).

- 3.7 However, where a survey suggests that extra resilience measures should be installed over and above what was previously installed under a PFR Grant Scheme and these are not insurable, the Local Authority can consider eligibility on a case-by-case basis. The survey in such cases would be carried out at the risk of the occupier by a suitably qualified professional and the cost redeemed as part of the Grant if the application is successful. Decision is at Local Authority discretion and should be in exceptional cases only and represent good value for money. E.g. if a new source of flooding is found that was not identified in a previous survey or new PFR measures are identified that were not identified in a previous survey.
- 3.8 Properties that have received Grant in Aid (GiA) funding and have since been flooded are eligible for this scheme. However, this grant can only be used for new PFR measures, it cannot be used to replace any damaged measures installed through the GiA Scheme.
- 3.9 The Defra PFR Repair Grant Scheme both now and in the past is intended as a one-off payment to assist properties in becoming resilient to future floods as part of the repair process. It is not compensation for flooding, nor is it a relief or repair fund.
- 3.10 A change in ownership of a property since a previous award should not generate a need for additional support for the new occupant as the Grant is paid to improve the property, and not for the individual.
- 3.11 Home insurance policies generally put properties back to the state they were in prior to flooding. This should mean that those properties previously adapted should be able to secure repairs to any sacrificial or removable elements from their home insurer. The Grant must not be used for costs that should be covered by home insurance or product guarantees.
- 3.12 Uninsured properties are equally eligible for the Grant.
- 3.13 Collaborative applications (applications where individual property owners decide to pool their grants) should be supported and encouraged where the approach offers a better standard of flood risk reduction than would be the case by treating each property individually. E.g. Older terraced properties tend to have thin party walls and connected basements. A more effective flood solution might be barriers for a street as a whole, where middle properties would have no direct PFR installed, but end properties would. A real life example of collaboration can be found in the Annex.
- a. Local Authorities may, in exceptional situations, agree to support a small number of unflooded properties in collaborative applications. The specific activities should be limited and essential to the maintenance of measures installed to impacted properties and where not funding unimpacted properties would seriously undermine the benefits from all investments.
- b. The funding should not exceed the maximum £5,000 grant per property.

- c. Participation in collaborative schemes should be voluntary on the part of eligible property owners.
  - d. Local Authorities may facilitate collaborative projects where it is beneficial to do so.
- 3.14 Many insurers are now offering 'Build Back Better' (BBB) payments. This means that households can claim an additional amount as part of their flood claim, which will fund measures which will improve the flood resilience of the property. This can include carrying out surveys to understand the flood risk and potential mitigation, the addition of flood resistance measures such as flood doors, and flood resilience measures such as the replacement of damaged parts of the home with more flood resilient materials such as hard floors. People who have BBB as part of their insurance claim can apply to have a PFR grant but it is recommended that customers engage with their insurers in the first instance where they are eligible for BBB.

## 4. Surveys

- 4.1 A property survey is required as part of the scheme to identify things such as where the flooding came from, and the best PFR measures to prevent or limit re-occurrence. A survey must be carried out by a suitably qualified independent surveyor.
- 4.2 Up to £500 of the total grant money can be used to fund the cost of a survey. Any cost above £500 would need to be met by the property owner.
- 4.3 The cost of the survey will only be reimbursed by Defra as part of a full and complete application to the Grant Scheme. There is no requirement for the application to be for the full £5,000 amount. Speculative surveys where no work is then carried out, and where the applicant does not receive the Grant will not be refunded. Defra will not reimburse for stand-alone survey costs.
- 4.4 While Local Authorities will not be expected to undertake the repair work or contract directly with external contractors, including surveyors, Local Authorities will be responsible for verifying the eligibility of applications and the quality of work undertaken. Accordingly, Local Authorities should only accept such project plans where they are satisfied with their quality and the independence and competence of the person conducting the survey.
- 4.5 Local Authorities may:
  - a. Leave it to applicants to find their own suitably qualified independent surveyor to develop their projects for the Scheme or work with others (for example, the loss adjuster or surveyor) working on behalf of the insurance company.
  - b. Alternatively, to expedite the process, a Local Authority may wish to consider whether it should engage a suitably qualified and experienced independent surveyor to work on behalf of applicant(s) and offer their services with individual projects (subject always to compliance with the relevant Local Authority internal rules or guidance). Be aware if choosing this option, or funding in advance for multiple surveys, Defra will only reimburse for completed works and not speculative surveys. If a Local Authority chooses to contract with a survey company for multiple properties, but not all those properties end up going through with work, Defra will only reimburse for those that have been completed. Local Authorities should consider any applicable procurement law obligations, including internal rules, if engaging any external contractors.

4.6 For PFR purposes “suitably qualified” requires a contractor to have completed the Chartered Institute of Water and Environmental Management (CIWEM) Property Flood Resilience Industry Training. Designed and delivered by CIWEM & Partners and commissioned by the Environment Agency, this comprehensive suite of PFR training unifies the PFR industry and establishes competencies for those delivering PFR in accordance with the Code of Practice for PFR. The training suite of 24 modules is designed specifically for industry professionals delivering PFR services and measures. The modules provide specific technical training under each standard of the Code of Practice for Property Flood Resilience to upskill and align the industry on a unified approach to PFR delivery. Those completing the required training and demonstrating relevant industry experience can become a 'Certified Professional' in the delivery of flood resilience measures.



## 5. Standards of Work

- 5.1 [The Property Flood Resilience Code of Practice](#) (CoP) is concerned with PFR measures that can be introduced to buildings at risk from flooding. The Code covers both flood resistance – measures which can help prevent water from entering properties - and flood resilience, which help to limit the damage that floods cause. The CoP includes six standards that specify what should be achieved.
- 5.2 There are a range British standards covering flood resilience which are covered in the CoP. If Local Authorities require independent advice, they should contact a qualified professional.

## 6. Local Authority Implementation and Process

- 6.1 The Environment Agency (EA) has a supplier framework that can enable Local Authorities to progress surveys and installation under the PFR Grant Scheme.
- 6.2 Any Local Authority currently signed up to this can use their existing contacts to progress work. For those who are not currently signed up please contact:
  - a. Kirsty Harwood (PFR Framework manager) [kirsty.harwood@environment-agency.gov.uk](mailto:kirsty.harwood@environment-agency.gov.uk) or:
  - b. Toni-Leigh Clarke (Assistant Framework manager) [toni-leigh.clarke@environment-agency.gov.uk](mailto:toni-leigh.clarke@environment-agency.gov.uk)
- 6.3 Local Authorities may choose to outsource local delivery of their scheme. In such circumstances, accountability will remain with the Local Authority.
- 6.4 Any contracting must be subject to compliance with relevant Local Authority internal rules or guidance.
- 6.5 Defra advise the following outline process is followed to ensure consistency of the Scheme across all Local Authorities:
- 6.6 To encourage high take up rates for the Scheme Local Authorities will need to act as quickly as possible.

### Promotion

- 6.7 Promotion can take various forms, and a multi-pronged approach has been the most successful in the past. This can include:
  - a. Promotion on the Local Authority website
  - b. Contacting local community groups to spread awareness of the Scheme.
  - c. Sending out printed materials directly to affected properties.
  - d. Placing adverts in local papers
  - e. Speaking on local radio
  - f. Direct calling affected people and businesses.
- 6.8 This list is not exhaustive and Local Authorities are encouraged to promote the Scheme in any way they see fit that meets their own guidelines.
- 6.9 All promotional materials should contain:
  - a. The eligibility period for the flooding
  - b. The latest date to submit claims

- c. Funded by UK Government branding. All public and partner-facing visual material regarding any of the schemes in the FRF (which includes this PFR Grant Scheme) should include the “Funded by UK Government” branding. Guidance on how and when to use this branding is available on gov.uk:

[https://gcs.civilservice.gov.uk/wp-content/uploads/2022/12/Branding\\_Funded\\_By\\_UKG-.pdf](https://gcs.civilservice.gov.uk/wp-content/uploads/2022/12/Branding_Funded_By_UKG-.pdf)

## **Applications**

- 6.10 The application process should be made as simple as possible. It must be accessible to all members in the community and take into consideration disability. Previous Local Authorities have had success with an online application process, supplemented with the option of a postal or in person application if it is required for access reasons.
  - a. A model application form is provided in the Annex pack. This can be amended as the Local Authority sees fit.
- 6.11 Local Authorities need to ensure that any advice to applicants is independent and impartial and people are not pressured into adopting unsuitable approaches.
- 6.12 Applications can be accepted from the property owner and/or anyone acting on their behalf including but not limited to third parties and insurance companies.
- 6.13 The expectation is that the applicant will make arrangements and enter contracts with external contractors. Local Authorities are not expected to undertake the work or contract directly with external contractors (with the exception of surveys, at the Local Authority discretion – see Section 4 – Surveys). However, Local Authorities do have the discretion to co-ordinate this if they would prefer.

## **Decisions**

- 6.14 Local Authorities will need to determine whether the application meets the scheme criteria. All decisions are at the Local Authorities' discretion when following the criteria outlined in this document. The Local Authority will need to ensure that the works proposed appear suitable for the property and ensure value for money.
  - a. We have included an annex document showing indicative costs of PFR measures as of 2016. This information is given as a guide only and Local Authorities should keep in mind inflation costs since it was issued.
- 6.15 It is important to ensure that any works proposed are in addition to those that would be covered through normal insurance processes. This grant is for additional PFR work to be completed, not to be used to return a property to its previous state. This applies to both insured and uninsured properties.

- 6.16 A decision should be made as quickly as possible on an application, with consideration given to the amount requested and “good use” of public money. Applicants should be informed of the decision in good time.

### **Quality of Work Checks**

- 6.17 Local Authorities will need robust processes in place to administer the Scheme and to carry out risk-based inspections to check the quality of PFR work and to assist applicants to follow-up cases of poor workmanship.

### **Payment**

- 6.18 Once payment from Defra has been received it should be issued following the Local Authorities' normal internal practices for paying money. This should be done as soon as is practical. Defra sets no restrictions for who the money should be paid to, e.g., if an applicant has requested it is paid straight to a contractor, this is at the Local Authorities discretion.
- 6.19 There is no additional funding given by Defra for resource allocation within Local Authorities. Defra recommend that a combination of staff skills are utilised to administer this grant, from both flood experts, those on the ground and admin and financial staff.
- a. For detailed information on payments see Section 8. Payments from Defra.

## 7. Audits

- 7.1 It is the role of the Local Authority to put in place audit arrangements to ensure that the Grant is used for its intended purpose.
- 7.2 The Scheme should be accompanied by risk-based checks on properties to ensure measures agreed and funded have been carried out. Local Authorities should include an anti-fraud statement in scheme materials and reserve the right to conduct a full audit.
- 7.3 Risk management processes should not cause unnecessary delay in getting people back into their properties, and all efforts should be made to minimise drawn out procedures.
- 7.4 Local Authorities are responsible for making sure the same property does not receive a PFR Grant twice (unless in exceptional circumstances – See Section 3: Scheme Eligibility for Properties) and should use their own internal audit processes to make sure this doesn't happen.
- 7.5 The National Audit Office (NAO) carries out audits and reports results to Parliament, to help to hold government departments and other bodies to account for how they use public money. This safeguards taxpayers' interests. As part of their oversight duty, the NAO may decide to carry out spot checks on both Defra and Local Authorities. This may require short notice information be provided by Local Authorities to Defra to comply.
  - a. <https://bregroup.com/expertise/resilience/flood-resilience/>.

## 8. Payments from Defra

- 8.1 Payment from Defra to the Local Authority will only be made once the work has been completed for each property. There will be no payments made for partial or incomplete work.
- 8.2 Funding is released from Defra to Local Authorities on a quarterly basis, following the MOU.
- 8.3 Funds will be provided as grants paid under Section 31 of the Local Government Act 2003 and will be based on the number of completed properties.
- 8.4 Any costs incurred above the £5,000 per property grant will not be paid. The Grant is intended as a contribution and may not cover all costs involved.
- 8.5 The invoicing periods are as follows:
- a. 1 Feb 2024,
  - b. 1 May 2024,
  - c. 1 Aug 2024,
  - d. 1 November 2024,
  - e. 1 Feb 2025,
  - f. 1 May 2025,
  - g. with final claims submitted by 1 Aug 2025.
- 8.6 Invoices sent outside of the invoicing period (without prior agreement) will not be paid.
- 8.7 Local Authorities will be contacted prior to the invoicing period to confirm the expenditure amount for the quarter. It is imperative that accurate figures are provided at this stage as they are sent to HM Treasury for approval before funding is released.
- 8.8 Once a figure has been submitted to Defra it cannot be amended in that quarter. Amendments can be made for subsequent invoicing periods, e.g., if a Local Authority has over-estimated the amount they will invoice in invoicing period A, then any remainder will be carried over to invoicing period B.
- 8.9 When sending an invoice to Defra during the invoicing period the following will need to be included:
- a. The number of properties covered by the invoice.

- b. A one-line summary of the measures installed for each application covered by the invoice, including a reference number for each property. This is known as the evidence.
  - c. A sign-off by the relevant Section 151 Officer under the Local Government Act 1972, as per the MOU 5.3.1, to include the following wording:
  - d. “To the best of my knowledge, having made reasonable enquires of the Authority’s staff which a diligent and competent chief finance officer would make, I am satisfied that the Authority has used reasonable endeavours to ensure that all Claims have been verified, processed and paid in accordance with the MOU”.
- 8.10 Invoices are only to be sent digitally. Any invoices sent by post will not be received or processed. All invoices, evidence and S151 sign off should be sent to the single point of contact email: [propertyfloodresilience@defra.gov.uk](mailto:propertyfloodresilience@defra.gov.uk), and only during the invoicing period dates.

## 9. Reporting to Defra

- 9.1 Defra requires two points of contact for the Scheme to run efficiently. Contact details of two individuals should be provided to Defra, via the single point of contact e-mail address [propertyfloodresilience@defra.gov.uk](mailto:propertyfloodresilience@defra.gov.uk), as quickly as possible. It is the Local Authorities' responsibility to keep Defra informed of any staffing changes for the duration of the Scheme.
- 9.2 Each Local Authority should maintain a record of the number of eligible properties; number of grant applications received; number of approved and rejected applications (including brief reason why for rejections); and for those approved the value of the Grant awarded and what measures were applied. Local Authorities should hold this data in line with their local data management policies and retain the information for a period of 6 years following the closure of the Scheme.
- 9.3 Local Authorities will provide Defra with monthly progress reports, from the start of their MOU. Reports will contain the following information as a minimum:
- a. Residential Properties Applied,
  - b. Business Properties Applied,
  - c. Residential Properties Approved,
  - d. Business Properties Approved,
  - e. Residential Properties Rejected, and
  - f. Business Properties Rejected.
- 9.4 The numbers provided each month should be only for applications received/rejected/approved in that month. There should be a rolling tally for each section to show the total applications over all months. A usable excel reporting template is provided in the Annex Pack.
- 9.5 Defra will use this information in accordance with GDPR. Please be aware that Ministers, or Defra may require other or more detailed information at short notice, and this should be provided upon request.



## 10. Contact Information:

- 10.1 All contact between Defra and Local Authorities will come from the PFR Grant shared inbox [propertyfloodresilience@defra.gov.uk](mailto:propertyfloodresilience@defra.gov.uk). All Local Authorities who want to contact Defra about the Scheme should use this e-mail address.
- 10.2 All information requests, data and invoices should also be sent to this e-mail address only. This is the only way to guarantee someone on the Defra team will see and respond to the information/query.
- 10.3 Local Authorities should provide at least two points of contact for the Scheme. If these points of contact change Defra should be notified immediately.

# PART 2

## 1. Training for Local Authorities

1.1 The Chartered Institute of Water and Environment Management (CIWEM) offers several free and paid for courses which may be particularly beneficial for Local Authorities who have little experience with flooding or PFR.

a. Their training can be accessed via the following web address:

<https://www.ciwem.org/training/pfr-industry-training>

1.2 Building Research Establishment (BRE) have a model house that can be viewed at their science park in Watford. Defra may be able to facilitate a group trip to view this in the initial stages of a scheme to enable Local Authorities to see good practice in a real-life setting.

a. <https://bregroup.com/expertise/resilience/flood-resilience/>

## 2. Case Studies and Examples

### Collaborative Example

- 2.1 Storm Desmond, on 5<sup>th</sup> to 6<sup>th</sup> December 2015, saw flooding to 15 properties in the Tyne Green area of Hexham, Northumberland. The flooding was a result of water from the swollen River Tyne flowing through a pedestrian underpass beneath the Newcastle to Carlisle railway line. In the months that followed the Environment Agency and Northumberland County Council worked together with the local community and other partners to identify a way of alleviating the risk of repeat flooding. The preference was to construct a flood embankment around the entrance to the underpass, a scheme which would protect the whole community.
- 2.2 Most affected households agreed to collaborate and pool their individual PFR grants of £5,000 per property. In this unique and innovative way, a £65,000 pot of funding was established to finance the community level scheme. Delivery of the Scheme was led by the Environment Agency who, to take receipt of the funding, entered into a legally binding contribution agreement with Northumberland County Council, who were the administrators of the PFR Grant Scheme.



- 2.3 This image shows the newly constructed flood embankment at Tyne Green, Hexham.

## Property Level Protection



2.4 This image shows a flood barrier in a doorway with flood water outside.

2.5 The above image shows a single flood barrier protecting an individual property. This is an example of work which can be installed through a PFR Grant.

## **Case Study – Carlisle City Council Flood Recovery Grants Scheme post Storm Desmond 2015**

- 2.6 In December 2015, over 6,000 households and Business in Cumbria were affected by flooding from Storm Desmond. In Carlisle City Council area, just over 1,800 households and business were affected. Each of the households and business affected were eligible to apply for a Property Flood Resilience Grant.
- 2.7 The scheme in Carlisle was delivered by the City Council. In-house the Private Sector Housing team administered the grants, due to the experience within the team in delivering housing grants. Officers also had experience from floods the City experienced in 2005.
- 2.8 Key partners were also brought into assist delivery of the Scheme and close working relationship were quickly made with other government bodies. Civil Society also played a key role in delivery
- 2.9 Carlisle City Council had three main objectives;
- a. To achieve a 30% take up of flood grants, across the 1800 flooded properties.
  - b. To support households and business to apply for the £5000 PFR Grant.
  - c. To provide an efficient grants administration service, processing applications and payments.
- 2.10 Following the government announcement in mid-December 2015, that 50 million was going to be made available for flood resilience measures, to households and business in Cumbria affected by storm Desmond, the recovery groups through the County Council and District Councils realised they had a huge challenge to effectively deliver a flood resilience grant scheme, not only from a delivery perspective regarding resources but the reality of communicating flood resilience with those that had just been hit the devastating storms.
- 2.11 Early on in setting up the flood grant scheme in Cumbria, it soon became apparent that independent flood level protection advice was required by property owners and business that were flooded. In Cumbria there was a significant lack of specialist support available early on in the Scheme and it became apparent through the County Housing Flood Recovery group, that there was a risk that without independent surveys there was every danger that the Scheme would be run by sales of property level protection products and the installations of potentially unsuitable products, rather than a whole property approach looking at both the resilience measures that could be undertaken and suitable property level protection products.

- 2.12 The District Councils, alongside the County carried out a mini procurement exercise to put in place a framework the District Councils could use of property level protections surveying companies. It was through this exercise that a partnership agreement was put in place with independent Flood Level Protection specialist surveyors. They were brought on board to assist property owners making their flood resilience grant applications by providing an independent survey. The cost of the survey is covered by the grant but paid up-front by the Council.
- 2.13 Following the introduction of the partnership in March 2016, the Council carried out stream of constant marketing exercises across a variety of communications channels, all with the key aim of encouraging take up of the available survey and the grant available. The marketing of the Scheme constantly evolved to refresh its approach in the delivery of the Scheme.
- 2.14 In June 2016, Carlisle City Council followed suit with colleagues in South Lakeland District Council and Allerdale Borough Council and started working in partnership with the Business Emergency Resilience Group (BERG). BERG supported the Council in providing a BERG representative in the Council Monday to Friday 9 – 4. The BERG representative was on hand to offer advice and general support to households and business on flood resilience.
- 2.15 A similar service was also available through the Carlisle Flood Advice centre (CFAC), an independent charity supported organisation, however the service available through the CFAC was Friday and Saturday only and primarily focused on insurance issues and supporting vulnerable households, later assisting households with flood resilience grant applications.
- 2.16 Foundations Independent Living Trust (FILT) also assisted in funding a Flood Recovery Support Officer, The Officer started in August 2016 and focus was providing street level support to vulnerable households. The introduction of the post was extremely successful in providing one to one support in the home, to vulnerable flood victims, getting them the information and support they need, from affordable warmth grants to flood resilience. The post also worked closely with government and third sector agencies.
- 2.17 Community schemes were also developed through Newground, who were brought in by the Environment Agency. Newground had a role in encouraging take up in communities and were particularly successful in getting flat and leaseholders on board, covering 150 properties that would not have otherwise applied for the funding.

- 2.18 Cumbria Community Foundation, through the Cumbria Flood appeal also made £2000 top up grant available for those applying for flood resilience measures through the Council schemes. This additional top up also played an essential part in the delivery of the Scheme in encouraging households take up the grant. Carlisle CC heavily promoted the top up grants as in most cases costs did exceed the £5000, so having the ability to apply for a top up encourage take up of the grants.
- 2.19 Approximately 350 households applied for the top up grants through CCF.

### **Conclusion**

- 2.20 The application deadline for the Scheme closed on 31st March 2017. The Council approved 1,114 applications. Just over 75% take up of the flood grants: equating to £5m of flood measures being installed by homes in the city. The key to the success of the Scheme, has been in the communication strategies the Council and supporting agencies have applied, but also in the essential support we received from Civil society groups and the need to share partnership working.
- 2.21 Resources were a significant challenge and balancing the length of the Scheme, considering resources. Carlisle CC didn't deploy full time staff on the project but factored the grants into existing workflows. This however, due to the Scheme success did prove to be problematic, in any future incident resources to run the Scheme would need to be considered.
- 2.22 The City also carried out a lessons learnt exercise to be better prepared should funding become available again in future.

### 3. Forms and Documents

3.1 **ANNEX A:** Indicative Costs of Resilience Measures.

3.2 **ANNEX B:** Model Application Form.

3.3 **ANNEX C:** PFR Defra Monthly Reporting template.