

Rt Hon Steve Reed MP
Secretary of State for Housing, Communities and Local Government

Rt Hon Emma Reynolds MP
Secretary of State for Environment, Food and Rural Affairs

(sent via email only)

9th March 2026

Dear Secretary of State,

Thank you to you and your team for your constructive engagement on climate and flood resilience, particularly through the National Flood Resilience Taskforce. We've appreciated the opportunity to work together to strengthen the UK's preparedness for future flood events.

We welcome the government's focus on delivering growth through planning reform and its ambition to deliver 1.5 million homes by the end of this Parliament. We want to ensure new homes are built to high standards with climate and flood resilience built into the planning system. Despite the government's welcome investment in future flood defences, we remain concerned about the impact of flooding on new homes.

We are writing to set out our serious concerns on the updated National Planning Policy Framework proposal to allow developers to bypass the sequential test in areas at high risk of surface water flooding.

Flooding can cause serious disruption to people's lives, homes and livelihoods. Insurers are committed to helping households and businesses recover quickly and to improving long-term resilience. Our latest [property claims and premiums tracker](#) shows that insurers paid out £1.2 billion in weather related property claims, an increase of 14% from 2024. Claims for weather damage to people's homes and possessions alone accounted for £758 million.

The Environment Agency's [National Assessment of Flood and Coastal Erosion Risk in England \(NAFRA 2\)](#) makes for sobering reading. 6.3 million homes in England are at risk of flooding, with 4.6 million at risk from surface water flooding. The figure is up from 5.5 million homes in the last assessment carried out in 2018 and there are now more homes at risk from flooding.

Aviva's [latest research](#), based on the Environment Agency's NAFRA 2 and Ordinance Survey data, shows that a material percentage of new homes are being built in areas at medium or high risk of river, coastal or surface water flooding. One in nine (11%) new homes built between 2022 and 2024 are at risk of flooding today. Once climate change is taken into account, by 2050, the percentage of new homes at medium to high risk of flooding is projected to rise to 15%, one in seven new homes.

As you may be aware, the ABI worked alongside the government to design, develop and implement Flood Re. Flood Re is a world first reinsurance scheme that has provided property

owners in at-risk areas with affordable flood cover in a competitive market. Homes built after 2009 are not within scope of the scheme, as set out in legislation, in order to avoid encouraging development in high flood risk areas.

With climate change worsening, the UK's flood risk increasing even further, and a relaxation of planning rules which could increase flood risk to both pre and post-2009 properties, this all means that we are not on track to transition from Flood Re to an affordable risk reflective market when the scheme is due to end in 2039. The implication is that high flood risk homes have the potential in the future to become uninsurable and struggle to access mortgages.

A recent [investigation](#) by ITV News into planning breaches by a developer on housing estates across the country highlights the real devastating consequences for homeowners if development in high flood risk areas is allowed unchecked. Weakening planning protections as outlined in the government consultation, could mean this may sadly become a more common experience.

Managing surface water flooding needs increased focus, and we are calling on the government not to weaken the sequential test for surface water flooding within the NPPF as this would significantly weaken the safeguards in place and risk exacerbating the growing problem of homes facing surface water flooding.

Instead, the government needs to urgently implement and mandate Sustainable Drainage Systems (SuDS) by implementing Schedule 3 of the Floods and Water Management Act 2010. Implementing these measures will help address rising surface water flooding and water pollution.

The emotional trauma of flooding cannot be underestimated. The British public is already skeptical about the country's resilience to floods, with 66% saying they do not think the country or their local area is prepared to deal with future flooding. We cannot risk making that worse.

There is an economic cost to not making homes resilient to flooding, and a strong case for doing so. The average [flood payout](#) to a homeowner in 2025 was £30,000, up 60% on 2024, ¹whereas the average additional cost for a minimum “no regrets” package of property flood resilience measures for a new home is c.£1000, (figure from the International Property Flood Resilience Association).

We would very much welcome the opportunity to meet with you to discuss our concerns further and how we can continue to work together to help achieve the government's home-building ambitions, with climate and flood resilience in mind.

¹ <https://www.abi.org.uk/news/news-articles/2026/2/adverse-weatherpushesproperty-insurance-payouts-to-6.1-billionin-2025/>

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