

RTPI response to the draft National Flood & Coastal Erosion Risk Management Strategy

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The Royal Town Planning Institute (RTPI) champions the power of planning in creating prosperous places and vibrant communities. As learned society, we use our expertise and research to bring evidence and thought leadership to shape planning policies and thinking. As a professional body, we have over 25,000 members across all sectors, and are responsible for setting formal standards for planning practice and education.

General observations

The strategic objectives are in the main inarguable but also seem to be disconnected from the reality of (1) achieving sufficient resources to implement them and (2) securing buy in from other government departments, especially MHCLG, to mainstream this as a priority.

Our work on [Map for England](#) in 2012 showed how the different spatial plans of different government departments did not require any sign-off for consistency. In particular one continuing concern is that MHCLG policy on the location of development nationally is based almost entirely on past trends. This means that if a place has grown a great deal, the requirement on it is to continue growing. The Government seems to decline to exert any influence over the national location of development. This is not consistent with an approach to flood risk management and water stress management. Many of the places which have grown fastest in recent decades ought in the light of a proper FCERM strategy be replaced by places with greater environmental resilience.

Strategic objective 1.1: Between now and 2050 the nation will be resilient to future flood and coastal risks. Over the next year the Environment Agency will work with partners to explore and develop the concept of standards for flood and coastal resilience

There is an expectation within the Strategy that the number of properties built on the flood plain will double by 2065 (p 4-5 and Fig 1). This assumption is derived from a Long Term Investment Scenarios document, and is itself based on assumptions about the likely outcomes of planning decisions over that period. There appears to be an assumption that current trends in terms of planning decisions in England and their implications will continue throughout that period. Reflecting these trends will necessitate expenditure of £1 billion pa to ensure that property damages over that period do not increase (p17). With planning decisions capable of being influenced by Government policy, it seems surprising that the strategy appears to accept these projections without reservation. As noted on page 18 of the document: "If we don't change our approach, we risk locking future generations into a legacy of increasing challenges." These assumptions about development on the flood plain also appear inconsistent with page 19 of the

document, where “making decisions on land use” is recognised as a key resilience tool in reducing flood risk, including “directing development away from the areas at risk”. In addition, in referring to areas at risk of flooding, the Strategy says (p33): “Ideally, no-one wants to build in these areas. The Government’s planning policy makes this clear, steering development away from flood plains ...” There do seem to be some clear inconsistencies on these issues within the strategy.

Measure 1.2.4 proposes that a new set of Long Term Investment Scenarios will be produced by 2025. In view of the concerns expressed above, there is a strong case for this work to be brought forward with urgency. Until completed, the Strategy could alternatively recognise a range of scenarios for development in the flood plain, with the implications of different options more fully explained. There appears to be a strong case for opening an ongoing dialogue with the Environment Agency on these issues.

Page 19 of the Strategy recognises that “making decisions on land use” is one of the key tools to help places avoid flooding, and yet the LTIS would imply that this key tool is not used effectively. Also page 33 and Strategic Objective 2.1 identify that 20% of the projected new development on flood plains will occur in just 3% of local authorities. This surely provides an opportunity to change policy and profoundly influence these trends.

Strategic objective 1.2: Between now and 2050 risk management authorities will help places plan and adapt to flooding and coastal change across a range of climate futures

In Fig 11 on p24, “influencing long term strategic planning and resilient place-making” is identified as a benefit of such an approach, and the text refers to “strategic local spatial plans”.

The RTPI is concerned at the proliferation of local environment plans which have arisen piecemeal as a consequence of a series of EU Directives. The consequences are :

- Lack of coordination between different local environment plans
- Lack of coordination between environment plans a local plans
- Unnecessary burdens on local planning authorities to deal with all of this

Leaving the EU provides an opportunity to draw all local environment planning together. Therefore we strongly urge the merging of the planning work of “risk management authorities” with other local environmental activity. The key here is place led planning not theme led planning.

The removal of county or regional tiers of planning has meant 10 years of lost potential in “long term strategic planning” and the creation of genuinely “strategic ... spatial plans”. [A strategic local plan does seem like a contradiction in terms.] For the Environment Agency’s strategy to work there needs to be more broad brush take up of strategic planning over wider areas and longer timescales. That would need a cross-government initiative. There would be limited scope here if issues around incentives and resources for strategic planning are not resolved especially by MHCLG.



Strategic objective 2.1: Between now and 2030 all new development will contribute to achieving place based resilience to flooding and coastal change

Measure 2.1.1 and 2.1.2 propose that “risk management authorities will invest in planning skills and capabilities to ensure they can advise planners and developers” and setting out the advice that will be available to LPAs. However it is not enough for “risk management authorities” to invest – local planning authorities will also need to be enabled to do so, in a very tight local government spending environment with highly competing priorities.

The combined total expenditure of all English local planning authorities on development management and planning policy is around £900 million a year, £2.7 million per authority, or £16 per person.

Since a significant amount of this is recouped in fee income, the actual net investment in planning is only around £400 million per year or about £7 per person.

The majority of the total spend (£613 million) is on development management, whilst total expenditure on planning policy is now just £278 million a year or around £5 per person per year.

Prior to the coalition Government, in 2009-10, funding for planning was significantly greater. The following are some of the real-terms cuts between 2009-10 and 2017-18:

- Total expenditure on planning has fallen 19%. This fall would be far higher except for the fact spending is propped up by a 50% rise in planning income.
- Total expenditure on development management has fallen by 11%, while total expenditure on planning policy has fallen by 32%.
- Removing income from the equation, total net expenditure on planning has fallen by 42%.
- Cuts have had a major regional variation, with reductions in net expenditure of more than 60% in The North East and West Midlands and more than 55% in Yorkshire and the North West.

Strategic objective 2.4: Between now and 2050 places affected by flooding and coastal change will be ‘built back better’ and in better places

The expertise of spatial planners and strong coordination between environmental planning and spatial planning will be needed to achieve this objective.

Strategic objective 3.4: Between now and 2030 the nation will be recognised as world leader in managing flooding and coastal change, as well as developing and attracting talent to create resilient places

Given the frequent reference to spatial planning in the draft Strategy it is disappointing that spatial planners are not one of the specialists identified.