



RTPI

mediation of space · making of place

Royal Town Planning Institute
41 Botolph Lane
London EC3R 8DL
Tel +44(0)20 7929 9494
Fax +44(0)20 7929 9490

Email online@rtpi.org.uk
Website: www.rtpi.org.uk

Registered Charity Numbers
England 262865
Scotland SC 037841

Patron HRH The Prince of Wales KG KT PC GCB

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M Cox
FCERM strategy team,
Rio House,
Waterside Drive,
Aztec West,
Bristol BS32 4UD

Email response sent to: DefraEAFCEMstrategy@environment-agency.gov.uk

Dear Sirs,

RESPONSE TO CONSULTATION PAPER: The National Flood and Coastal Erosion Risk Management Strategy for England

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing over 23,000 spatial planners. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

This response has been formed drawing on the expertise of the RTPI Environmental Planning and Protection Network's Water and Marine Spatial Planning Group.

General Comments

The Royal Town Planning Institute has a number of general comments it would like to get across. We welcome the publication of the consultation document and the opportunity to respond to it. For many years, the Institute has been concerned about the increasing regularity of incidents of flooding and coastal erosion. There is a clear linkage between many of the floods and the effects of climate change on weather patterns. The Institute welcomed the introduction of the Flood and Water Management Act 2010 and is pleased that the Coalition Government has expressed a willingness to implement the proposals set out in the Act.

Recent 2010 flooding incidents in Cumbria and Cornwall have further highlighted the need for more to be done to tackle flood risk. The recommendations of Sir Michael Pitt, in his 2008 report, were broadly acknowledged by the Institute as charting a way ahead. In its recent manifesto on planning, the RTPI has placed climate change as one of the key challenges to the achievement of sustainable development. It has highlighted the need for local planning authorities to adopt policies which seek to adapt to, and mitigate, the effects of climate change.

The Institute therefore recognises the requirement, as set out in the draft strategy, for local authorities and communities to be involved in the decision-making process. In particular, local authorities must develop strong policies in their Local Development Frameworks on climate change and flood risk. Coastal authorities must also consider policies to tackle the risks to the coastline, including, where appropriate, proposals for managed shoreline retreat. The positive role of the LDF should be acknowledged in the strategy.

In coastal areas too, the role of the Marine Management Organisation (MMO) will also be an up-coming feature of the decision-making process. This will be especially important in areas where Marine Plans are being prepared. The first two such plans in England, the East Coast Inshore and East Coast Offshore, are shortly to be commenced. There must be close co-operation between the MMO, coastal planning authorities, and the Environment Agency, to ensure that coastal erosion and flooding issues are thoroughly examined and subject to public scrutiny and involvement.

There is a strong role for planning policy in this process, which has not been fully picked up in the consultation document. One of the key elements in tackling the risks is to assemble an evidence base on where flooding or erosion is likely to occur, as part of the input to planning policy documents. Spatial planning can help to mitigate against the risks by locating future developments away from areas of possible concern. This has been a successful feature of the local planning process, driven by Government policy in PPS25 and its predecessors.

The current Localism Bill suggests devolving many powers from central to local government and the introduction of Neighbourhood Plans. Although the Institute has detailed concerns about many parts of the Bill, it supports the general principles of local involvement in the planning process. The general principles set out in this consultation document, coupled to local decision-making and funding, are therefore supported by the RTPi.

Answers to specific questions are given in the response form.

If you require further assistance, have any queries relating to the enclosed or require clarification of any points made, please contact the Policy and Practice Team on 0207 929 9466 or email policy@rtpi.org.uk.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Matt Thomson', with a long horizontal flourish extending to the right.

Matt Thomson
Head of Policy and Practice

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