

Response Form

The National Flood and Coastal Erosion Risk Management Strategy for England

Respondent details

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Put a cross in this box if you are requesting non-disclosure of your response.
Please provide an explanation to support your request.

Consultation questions on the draft national flood and coastal risk management strategy for England

1 Is there any additional information on risk that should be considered?

The Institute considers that the information on risks is comprehensive. There will be a need for contingency measures, but these are highlighted in Figure 2.

2 Are there any additional aspects of risk that need to be assessed?

Although the RTPI generally agrees with the analysis in Chapter 2, it is felt that there should be some mention of the role of planning policy in tackling the risks of floods and coastal erosion. This could be in the LDF, or, in coastal areas, the emerging set of Marine Plans, to be prepared by the MMO. We give more detail on this in our covering letter.

- 3 The strategy takes into account different sources of risk (for example coastal erosion and flooding from rivers and surface water).

How can they best be quantified in a way that helps the assessment of the relative importance of these risks?

Quantification of risks is important, but the relative risks of different types of flooding will vary according to the characteristics of regions and areas of the country. Many of the recent flood incidents have been related to sudden heavy rainfall, which has not been anticipated. There should be more measurement of surface water and storm drain capacity, especially where there has been a concentration of built development in recent years.

- 4 **Do you agree with the proposed overall aims of the strategy?**

Please tick the relevant box

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

If not, please explain why.

Although the Institute is generally supportive of the guiding principles in Section 3, we believe that the second of the stated aims has some risks attached to it as well as potential benefits. Whilst local funding sources may benefit flood and erosion risk management, there is a risk that encouraging individuals and local funders to implement their own schemes will result in poorly considered sets of actions. Money spent on ineffective actions would be money wasted. Individuals and local organisations cannot be expected to understand complex flood and coastal erosion issues as well as professional staff in the responsible authorities. These issues are often very emotive, and hence there may be political pressure on local planners to approve actions which would be ineffective and would not represent good value for money. Significant emphasis should be given in planning guidance to ensure that any proposed local measures are entirely consistent with higher level plans.

- 5 **Are there any additional goals that should be included?**

Please tick the relevant box

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

If so, what are they?

The RTPI agrees with the general thrust of this chapter – there are no further goals which should be included.

6 Are there any other guiding principles for FCERM you would include?

Please tick the relevant box

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

If so, what are they?

The Institute agrees with the guiding principles and would not wish to suggest more.
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7a Are the measures and actions set out in Sections 3.3.1 to 3.3.5 clear?

Please tick the relevant box

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

If not, how can they be improved?

The RTPPI considers that the proposed measures and actions in paragraphs 3.3.1 – 3.3.5 are very clear and will help to deliver the objectives in Section 2.

7b Do the measures and actions give enough specific information on what will be done and by whom?

Please tick the relevant box

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

If not, please explain where we need to be more specific.

In the more detailed analysis, the Institute thinks that there is insufficient clarity in the split between the roles of the local authorities and the Environment Agency on the development of local flood risk management strategies. In coastal areas, the possible role of the MMO should be included.
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8 Please tell us about any other measures and actions you would include.

There are no other measures and actions which the RTPPI would wish to include.
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9 Are you aware of any barriers to the implementation of the measures discussed in Sections 3.3.1 to 3.3.5?

Please tick the relevant box

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

If so, how can Defra and the Environment Agency help overcome them?

There are no other barriers except the availability of funds and the willingness of all parties to co-operate with each other and to overcome difficulties.

10a How should the relative risks to people, property and business (including agriculture and food production) be taken into account?

The relevant risks should prioritise on threats to the lives and well-being of individuals and households. Where the risks include the environment, this should be given the highest level of priority where there are threats to habitats and species of national or international importance.

10b How should the risks to people, property and business, and improving and protecting the environment and habitats be balanced?

See above.

11a How far is it possible to distinguish between FCERM benefits and other benefits (for example, to agriculture, land drainage, health, recreation, and the environment)?

No comments.

11b What is the best way to quantify these additional benefits and how should they be considered in FCERM decisions on priorities and funding?

No comments.

12 How may the current arrangements for emergency response be improved?

The recent enhancement of the powers and responsibilities of County Councils is welcome. It is felt that no further changes should be made at this time.

13 Are the responsibilities of the key organisations managing flood and coastal erosion risks clear?

Please tick the relevant box

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

If not, please explain why.

The roles of the various organisations, as set out in Chapter 4, are generally clear. The RTPI notes that in 4.2 it is confirmed that the Environment Agency will have the lead responsibility for dealing with flooding from main rivers, estuaries and the sea. Lead local authorities, however, have lead responsibility for flooding from surface water, groundwater, and other watercourses. Whilst we welcome this clarification of roles, it is the Institute's view that more thought may need to be given to the joint roles of these two sets of bodies in putting together strategies for local flood risk management. As currently set out, this appears to be the role of the local authorities, whereas it will be essential for the Environment Agency also to have a key role in developing these strategies so as to ensure joined-up thinking on all flooding matters in a single area. Further clarification would be welcomed on how this will be achieved.

14 Please tell us if any organisations or groups should be added and what their role might be.

The RTPI would welcome the addition of the Marine Management Organisation (MMO). The MMO would provide input into strategies by identifying the off-shore causes of coastal flooding and erosion caused by changes in wave patterns and tidal movements. Often these effects are caused by developments such as marine aggregates extraction, port and harbour expansion, or changes to navigation patterns.

15 Do the organisations identified in Chapter 4 have the skills and capabilities available to carry out the roles identified above and achieve the required outcomes?

Please tick the relevant box

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

If not, how should these be secured?

Organisations generally will have a range of skills and capabilities, especially in the Environment Agency. Experience elsewhere, particularly in local authorities, is patchy. Future capabilities are likely to be restricted by cuts to staffing and revenue budgets.

The expanded role envisaged for local authorities in developing flood risk management strategies will therefore be very challenging. Substantial assistance will be required from the existing skills base in the Environment Agency. At the same time, there will be a need for extensive training on the FCERM strategies and their delivery. The RTPI will be pleased to discuss with DEFRA the likely educational and skills requirements for planners, and the contribution which could be made by its accredited University courses.

16 Do you agree with the overall objectives for the proposed changes to the funding system as set out above?

Please tick the relevant box

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

If not, please explain your answer.

The RTPI is generally supportive of the direction of change in proposed funding mechanisms, as set out in the sister consultation document. The proposals in section 5.3, however, have potential risks that will need to be addressed. Whilst the aim of spreading funding to cover a wide range of projects could have substantial local benefits, the proposals create uncertainty in terms of budget spend. Those projects which are part funded by Government will require a detailed funding package to be negotiated, and this may result in a delay in delivery whilst the overall budget from different sources is being developed. Indeed, in some instances, a project may never go ahead if other sources of funding are not confirmed. This will make it difficult to predict Government expenditure on flood management and coastal erosion in any one year, with a risk of under-spend in any given financial year. It will be helpful, therefore, to make clear provision for funding allocations to be carried over where this happens. Alternatively, a reality check may be needed to drop the over-optimistic projects from the programme at the end of each financial year.

There is a further risk, in that if Government funding is spread more widely to incorporate less cost-effective schemes than are currently funded. The danger is that the overall programme will deliver less value for money, i.e. the overall level of flood management improvement will decline for a given amount of funding.

17 Please tell us about any other options for prioritising and justifying maintenance and managing situations where ongoing maintenance cannot be justified from national budgets.

The RTPI believes that any local priorities should be co-ordinated and led by local authorities, in consultation with the Environment Agency. Local Committees could be set up, so as to secure the involvement of local communities and businesses.

18 How often should local strategies be reviewed and who should be involved in the review?

In line with planning documents, the Institute advises that local strategies should be fully reviewed every five years. The local authorities, together with the Environment Agency, should be responsible for generating the review. There should be widespread community involvement, together with all agencies and organisations who contributed to the original strategy.

19 Should reports on the implementation of the national strategy assess progress against specific milestones and activities?

Please tick the relevant box

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

If so, what should these specific milestones and activities relate to?

Specific milestones should include the completion of strategies, so as to give all-England coverage, especially in coastal areas. Incidents of flooding and coastal erosion should be recorded for all areas, and set against meteorological data, to ascertain whether flood risk measures have been successful in reducing the effects of potential incidents. Data on flooding and coastal erosion should also be included in the local authorities' planning monitoring reports.

20 There are two levels of information: statutory guidance and advice.

Are there any areas where we are proposing to provide advice where you consider it should be statutory (that is provided as guidance)?

Please tick the relevant box

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

If so, please explain why.

The balance between statutory guidance and advice is about right, but should be kept under review.

We would also welcome your views on the following over-arching questions:

21 What primary objectives in FCERM should the strategy achieve over the next 12 years?

The main objective to be achieved is the adoption of flood and erosion management systems for all areas of England. Achievement of the other main objectives should follow. Please see our covering letter for further details.

22 Is the risk-based approach to FCERM appropriate and does the approach suggested take account of the main risk factors?

The risk-based approach is entirely appropriate – there are no other risk factors which the RTPI would suggest.

23 Are there any barriers to local action that need to be removed or reduced?

There are no additional barriers, national or local, which the Institute is aware of. The main barriers are likely to be lack of funding and other resources. Delivery of the processes should be monitored and changes made as and when appropriate.

Consultation questions on the guidance on co-operation between authorities and requesting information

1 Does this guidance sufficiently explain what we mean by co-operation?

Please tick the relevant box

Yes
No
Don't know

If not, what elements are unclear?

2 Does this guidance explain how the power to request information should be exercised in a reasonable way?

Please tick the relevant box

Yes
No
Don't know

If not, how might it be improved?

3 What barriers to co-operation and information sharing need to be addressed?

4a How much more effective do you feel statutory guidance would be than non-statutory or no guidance?

4b We have assumed that there will be a 25% saving in time dealing with information requests because of statutory guidance and advice to follow, as everyone will be working within a common framework.

Please tell us if this is a reasonable assumption or whether it should be more or less.

5 Do you have any suggestions for new sections to be included in this statutory guidance?

Please tick the relevant box

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

If so, please provide details.

6 If you are likely to be asked for information, are there any issues that may make it difficult for you to respond?

7a How many requests for information do you feel a lead local flood authority might make in any year?

7b If you have dealt with comparable requests before, how long might you expect it to take?

Less than 4 hours (short)	<input type="checkbox"/>
One to two days (medium)	<input type="checkbox"/>
Over one week (long)	<input type="checkbox"/>
Other (please specify)	<input type="text"/>

8 Do you feel that the functions that the guidance relates to need to be set out within it?

Please tick the relevant box

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

If so, which option as expressed at the start of Annex B is the most appropriate to use?

9 Is there any additional non-statutory advice or supporting information you would particularly wish to see (for example best practice or model agreements) that would help further encourage co-operation and information sharing?

Consultation questions on the draft Strategic Environmental Assessment report

1 Please tell us if there are any other key issues or trends that should be considered in the Strategic Environmental Assessment report.

- 2 **Please tell us if there are any additional environmental effects (including those on humans) that need to be taken into account when developing the strategy.**

- 3 **Please tell us if there is any additional mitigation for adverse effects that should be incorporated into the strategy.**

- 4 **Please tell us if there are any key environmental indicators that should be incorporated into annual reporting on the strategy.**

Returning your response

Thank you for taking the time to complete this form. Your response to this consultation needs to be returned by 16 February 2011.

You can return it by email to DefraEAFCEMstrategy@environment-agency.gov.uk.

Or by post to:

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