



**RTPI**

mediation of space · making of place

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Dear Sir/Madam,

**RESPONSE TO: Consultation on proposed amendments to Planning Policy Statement 25: Development and Flood Risk**

Thank you for the opportunity to respond to the above. The Royal Town Planning Institute is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

This document responds to the Consultation on proposed amendments to Planning Policy Statement 25: Development and Flood Risk issued by CLG.

The response has been formed drawing on the expertise of members including the RTPI Environmental Planning and Protection Network and the RTPI Water and Marine Spatial Planning Interest Group.

The RTPI welcomes the limited amendments to PPS25 and supports the proposal not to change the current overall approach and direction on planning policy in relation to development and flood risk. It is our general view that the document clarifies the policy approach in relation to ensuring the provision of essential infrastructure and emergency services for communities and businesses.

We feel it would be useful if the respective roles of the Local Resilience Forum and Emergency Planning Officers were better explained. We believe that the Local Resilience Forum could have a useful role in adjudicating over what constitutes safe access and egress in a flood risk area if agreement cannot be reached. The accompanying Practice Guide states that the local authority's emergency planning officer should be able to provide advice to developers producing an evacuation plan. We believe that this could result in resource implications which Local Authorities may not be able to meet. It would also be helpful if the Practice Guide could clarify who determines whether emergency services

facilities need to remain operational, and how this should be determined.

We note that wind turbines are not mentioned amongst the vulnerability classifications in PPS25. As the Government considers that wind power generation schemes have similarities with other strategic utility infrastructure which includes electricity generating power stations, we would suggest that wind power generation should also be classified as 'essential infrastructure'. We also believe that the Practice Guide should make a clear distinction between wind turbines and other forms of renewable energy in terms of the application of the sequential test.

PPS25 refers to 'essential infrastructure'. This consultation document introduces a new phrase - 'essential (critical) infrastructure', although there is no specific definition of what this is within the document. In order to avoid confusion, we recommend that the document use the Cabinet Office's definition of critical national infrastructure as proposed in the 'National Framework and Policy Statement on the Resilience of Critical Infrastructure from Natural Hazards'.

Our members have suggested that the definition of essential water and sewage treatment plant Infrastructure is reserved exclusively for developments that are critical and essential in nature.

If you require any further assistance, please contact Nicola Gough, Network Manager, on 020 7929 9494 or email [network.manager@rtpi.org.uk](mailto:network.manager@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  
Acting Director Policy and Partnerships