



RTPI Cymru

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e-mail response sent to: planconsultations-j@gov.wales

Dear Sir/Madam,

Response to: Further amendments to Technical Advice Note (TAN) 15: Development, flooding and coastal erosion

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 27,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,300 members. The Institute seeks to advance the science and art of planning, working for the long-term common good and well-being of current and future generations. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Thank you for the opportunity to respond to the above consultation. Our comments are set out below.

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,

Dr Roisin Willmott OBE FRTPi
Director

Q1	Do you agree that the amended version of TAN 15 makes it sufficiently clear when appropriate redevelopment and regeneration activities can be acceptable?	
Agree		
Neither Agree nor Disagree		X
Disagree		
Comments		
<p>We recognise the difficulties in defining phrases and terms, while encouraging flexibility in the decision making process. Uncertainty around terms could result in differing interpretations and practices on the ground, which will equally impact on the effectiveness of the TAN, investment and resource. We would support sector wide briefings to co-inside with the launch of the TAN to support clarity and interpretation in the decision making process, for all parties. This will ensure the TAN can be implemented as planned and its delivery on the ground is not compromised due to uncertainty in discussions or negotiations.</p>		
<p>Regarding viability, costs could vary significantly dependent upon the type of defence and mitigation. The draft TAN relies on public sector investment and relation to flood defences. We question the suitability of this and the longer-term plan in this respect.</p>		
<p>The Welsh Government National Strategy for Flood and Coastal Erosion Risk Management (FCERM) (2020) calls for a more joined up, holistic approach, not simply focusing on strengthening defences, but aligning wider measures to manage flood risk, for example using nature based solutions, to sustainably manage water as a vital natural resource that can support restoring biodiversity, carbon storage, reduce drought and help flooding etc. RTPI Cymru supports this approach and recommends this approach is emphasised in the TAN.</p>		
<p>RTPI Cymru supports the need to start investing in natural infrastructure alongside hard infrastructure. This is an important part of the bigger picture and aligning with the ambitions of the Well-being of Future Generations Act, recognising the contribution that the natural environment can make. This includes restoring peatland, addressing grazing schedules, maintaining paths, recreating riparian corridors/water meadow restoration etc. A wider emphasis on catchment management approaches through the development management plan system should be made.</p>		
<p>In this respect, we note the ambitions of the Brecon Beacons Catchment Partnership and also the Dŵr Cymru Welsh Water led initiative, 'Brecon Beacons Mega Catchment' The Brecon Beacons Mega Catchment: A proactive and collaborative approach to delivering a resilient drinking water supply – Maniffesto Bwyd Food Manifesto</p>		

Q2	The amended TAN seeks to ensure that climate change and flood risk are factored into planning decisions, and that decisions are taken in the knowledge of the associated risks. Do you agree that the TAN does this?	
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
Comments		
<p>We would suggest that Section 7 of the draft TAN be revisited.</p> <p>It is our understanding that, as part of the plan led system the Strategic Flood Consequences Assessment (SFCA) should inform the approach required. SFCA should be multiple scale/detail and integrated into sustainability appraisals and they should inform place plans, community adaptation or risk management plans. Yet, Community Adaptation and Resilience Plans (CARP) are discussed in section 7.2, before SFCA in section 7.3.</p> <p>RTPI Cymru has some concern that placing such strong reliance on strengthening defences will not be sufficient in the future and is not the holistic, joined up, long term approach that has been called for.</p>		

Q3	In seeking to allow for strategic regeneration the TAN requires local authorities to prepare Community Adaptation and Resilience Plans outlining how they intend to ensure that adequate flood defences are built and how other resilience measures will be incorporated. Do you agree with the need for such a requirement?	
	Agree	
	Neither Agree nor Disagree	x
	Disagree	
Comments		
<p>It is unclear when and where the CARP should best fit into the plan and decision making process. This could be usefully addressed in the draft TAN.</p>		

Q4	Some infrastructure is essential for economic, social or environmental wellbeing. A new section on essential infrastructure has been included in the revised TAN. Do you agree that this is necessary and that it is clear?	
	Agree	
	Neither Agree nor Disagree	x
	Disagree	
Comments		
We question how this relates to other national flood messaging, such as the FCERM and latest flood map evidence?		

Q5	<p>We would like to know your views on the effects that the revised TAN would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.</p> <ul style="list-style-type: none"> • What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? • Please also explain how you believe the proposed amendments to the TAN could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and • no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.
Comments	
No comment	

Q6	We have asked a number of specific questions. Are there any other related issues which we have not specifically addressed?
Comments	
RTPI Cymru welcomes the work taking place on flooding, however we raise concern regarding the emphasis on hard flood defences as the key to managing flood risk and future flooding. The need for long term resilience in addressing climate change must be	

considered, taking a holistic approach and aligning with nature-based solutions and a catchment wide approach.

The TAN includes advice on resilient design, but links to TAN 12 could be strengthened. Design for flood resilience needs to be more effectively integrated into wider design considerations.

Scottish Government's recent flood risk management conference, 'Water Resilient Places', set out a clear context in terms of the need for transformation and collaboration to deliver a diverse range of actions. Innovative planning case studies and tools were showcased at the event and follow up workshops are planned to pick up key themes and actions. Recordings and presentations of the events are available here - [FRM2023 Conference - Water Resilient Places | Sniffer](#)