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16 September 2019

e-mail response sent to: RisgLlifogyddArfordirol@llyw.cymru

Dear Sir/Madam,

Response to: National Strategy for Flood and Coastal Erosion Risk Management

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. 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.

The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

We welcome the opportunity to provide a response to the above consultation. The Strategy acknowledges that flooding and coastal erosion is a big societal issue that cannot be solved by Risk Management Authorities (RMAs) alone. Communities, businesses, infrastructure providers, and all public services need to become more actively involved with their own resilience. Local planning authorities (LPAs) will have an important role to play. In the field of coastal adaptation in particular, alignment with wider government policy will be of key importance, both within the Welsh Government and in local government. The intention to ensure that flood, coastal and planning policies align is particularly welcomed, and we look forward to responding to the update of the appropriate TANs in due course. It will be essential that the Strategy and the National Development Framework are closely aligned.

A key challenge will be to progress sustainable place making within those settlements where the risk of flooding is significant. There will be a need to focus the strategies in Local Development Plans on this challenge. The Strategy and TAN 15 update could helpfully identify a route through to this goal of integration. It would need to involve a wide range of stakeholders, in order to encourage consideration of wider benefits and third party financial contributions. Links between planning and flood risk management need to extend beyond

decisions on land use and SuDS to creating resilient places, which can accommodate the natural processes of flooding. A revised TAN15 could have a key role in this.

Question 1 - The aim of the National Strategy is to ‘Ensure the risks to people and communities from flooding and coastal erosion are effectively managed’. Is this clear and understandable?

Indicators to demonstrate that this aim is being achieved will be needed. The section of the Strategy on “Monitoring and Reporting” needs to be developed to give more confidence in being able to demonstrate progress.

Question 2 - Are the objectives and measures clear? If not, please explain how they can be improved.

Yes, we do broadly support the proposed measures. However, most are short term, and while the commitment to early progress is welcome, the Strategy lacks the characteristics of a long term strategy.

Measures 3 to 5 – Flood Risk Assessment Maps, Plans and Data

These measures are particularly welcome in helping a wide range of users, including LPAs, in being able to access up-to-date information.

Measures 9 & 10 - Shoreline Management Plans (SMPs)

It is clear that SMPs play a critical role in the Strategy, and that they need to be at the centre of decision-making. However, the measures proposed which relate to SMPs need to be more ambitious.

All SMPs now need to be updated. Given the scale of coastal flood risk and the importance of the SMP documents, there is a need for greater clarity on how and when updates or changes to SMPs are made. With these updates needing widespread consultation, periodic updates of SMPs on transparent timescales would be beneficial. With concerns that SMPs lack a statutory basis, the Strategy itself could help to clarify their status. It will be important for a revised TAN 15 in particular to ensure that the status of SMP proposals as material considerations in the preparation of Local Development Plans is clarified.

Measure 14 – SuDS Legislation

The commitment to check that the requirement for SuDS in new properties is being implemented and working as intended is welcome. However, the measure could be more ambitious, to include a review of the effectiveness of the legislation, guidance, policy and practice.

Measure 15 - TAN 15

We strongly support this measure. It is clearly important for planning and flood and coastal erosion policies to complement each other, both for the Welsh Government and for local authorities. It will also be important that the use of the guidance in TAN 15 through development plans and decisions on planning applications is monitored.

Where significant flood risks are present, all new development proposals will need to be assessed on their role in contributing to achieving resilience to flooding and coastal change. Proposals for redevelopment within settlements where significant flood risks are present will

need particularly sensitive assessment, and a revised TAN 15 will need to set the context for this. Regeneration policies will need to be carefully aligned with spatial planning and flood risk management.

Measure 16 – Coastal Adaptation

The approach to managed realignment needs further development. There will be communities behind current coastal defences that will be threatened with flooding due to sea level rise.

The Strategy makes it clear that planning processes will need to stop new development in vulnerable areas. The new TAN 15 could be influential in helping threatened communities to adapt by relocating development to lower risk areas. This may in places need to recognise that existing low lying properties along the coastline may not be sustainable.

We strongly support the need for Coastal Adaptation Guidance. This will need to focus on the role of spatial planning amongst the full range of other public services.

While coastal squeeze is recognised as an issue for coastal habitats within the Strategy, it is important to also recognise that this process will affect coastal settlements, where it will have implications for coastal adaptation. It is likely to affect properties and key infrastructure. It will also adversely affect coastal resorts which depend on their beaches for visitors. These settlements will need a review of their role and spatial framework.

Funding FCERM / Measure 19

The proposal for a reassessment of long term funding needs in Measure 19 is welcome. Collaborative working will be the key to securing contributions from wider stakeholders.

Additional mechanisms for funding will need to be found. Looking towards the longer term, a key opportunity could lie in the increase in land values which arises from public investment in infrastructure. Mechanisms to capture these increases and recycle them into further funding programmes will need to be found.

Using existing sources of funding more effectively should also be considered, including a review of whether the Community Infrastructure Levy might be used more effectively.

We note that the Wales Infrastructure Investment Plan will be coming up for review shortly, and that this also may provide an opportunity to place FCERM investment into a broader strategic context for infrastructure funding.

Question 3 - Do you agree with Objective A: Improving our understanding and communication of risk? Any comments on these new objectives?

Yes, improving understanding of risk is a key element of flood risk management. Making data easily accessible and understandable to the public, and to those involved in related decision making processes will be particularly important.

Question 4 - Do you agree with Objective D: Preventing more people becoming exposed to risk? Any comments on these new objectives?

The objective is broadly supported, although the use of the word “prevent” is questioned, when realistically risks can only be managed and reduced. It is clear that the number of people at risk will increase with climate change.

Nevertheless, the addition of this objective is welcomed, as is the determination to link the FCERM Strategy with strategic and local planning, and with TAN 15. This should provide a stronger steer to help LPAs, with the aim of avoiding unsustainable developments.

Question 5 - Does the National Strategy clarify roles and responsibilities in relation to flood and coastal risk management? If not, how could it be improved?

RTPI Cymru does not consider that roles and responsibilities are entirely clarified. Much of the Strategy refers to the role of planning in helping to deliver on flood and coastal erosion. It would be helpful if the role of local authorities as LPAs was recognised in the section on roles and responsibilities alongside their roles as Lead Local Flood Authorities.

Given the recognition that local communities need more capacity to respond to flood risk, Figure 5 should include town and community councils amongst the list of wider stakeholders.

Question 12 - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Mid Term Review

Monitoring and review will be important. With an eight-year timeframe for the Strategy, there is a strong case for a mid-term review after four years.

Cross-Border Collaboration

With major river catchments extending into England, and the way that people live and travel across the border, cross-border collaboration on planning, strategy and service delivery will be important. This applies in particular with SMPs, given the fact that two of these SMPs cross the England / Wales border.

Environmental Growth Plan

The interface of the Strategy with the Environmental Growth Plan could be important. More information on the Plan would be welcome.

Community Engagement

The Strategy makes some positive statements about community engagement, so it is regrettable that it lacks measures addressing this issue.

If you require further assistance, please contact RTPI Cymru at walespolicy@rtpi.org.uk

Yours sincerely,



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Director
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