

Plain dealing

BUILDING FOR FLOOD RESILIENCE

Research Briefing

This research briefing provides the key points and recommendations of the Localis report *Plain Dealing*. The full report is available to read on our website.

Planning for climate change and flood resilience

- The UK is experiencing more extreme weather events including flooding and rising sea-levels. The planning system must absorb and adapt to new circumstances wrought by climate change, with flooding a particular area of concern. This is most clearly manifest at the local level, where multiple pressures arise from the twin challenges of increasing housing supply and mitigating against flood risk. As such, development on flood risk areas sits at the intersection of the housing and climate crises.
- In England, some 5m properties – 1 in 6 – are at risk of flooding¹. With the current housing pressures and mandated targets, the country is likely to see almost double the number of properties in Flood Zone 3 – an increase from 2.4m to 4.6m – over the next 50 years².
- It is vital that any new planning system should have climate change as its first legal and policy priority. Planning makes a major contribution to both mitigating and adapting to climate change. However, the planning system has long had its faults and does not always work in the interest of best social and environmental value.
- The new 2021 NPPF has failed to address the seriousness of the climate emergency, downgraded planning's contribution towards combating climate change, and in doing so has also failed to bind the planning system to the UK's climate policy.
- The Planning for Future White paper is clear in its ambition to erase the existing system. Yet, rather than create a more rigorous system the proposed reforms in fact create uncertainty with little detail as to the role of the planning system in increasing climate resilience³. Planning reform needs to have climate change at its core to strengthen climate risk planning policy and to 'Build Back Better' as part of the UK government's plan for growth.
- At the local level, as key decision-makers, how local government acts within the current system is as crucial to resilience as to how central government carries out reform. Although most local authorities have climate change policies, over the last five years, few can show that their planning policies are designed to secure their area's contribution to the full decarbonisation of the UK, as required⁴.

1 <https://www.nao.org.uk/wp-content/uploads/2014/11/Strategic-flood-risk-management.pdf>

2 <https://www.theccc.org.uk/publication/progress-in-preparing-for-climate-change-2019-progress-report-to-parliament/>

3 <https://www.cse.org.uk/downloads/reports-and-publications/policy/planning/planning-white-paper-consultation-october-2020.pdf>

4 <https://www.theplanner.co.uk/opinion/councils-must-climate-proof-plans>

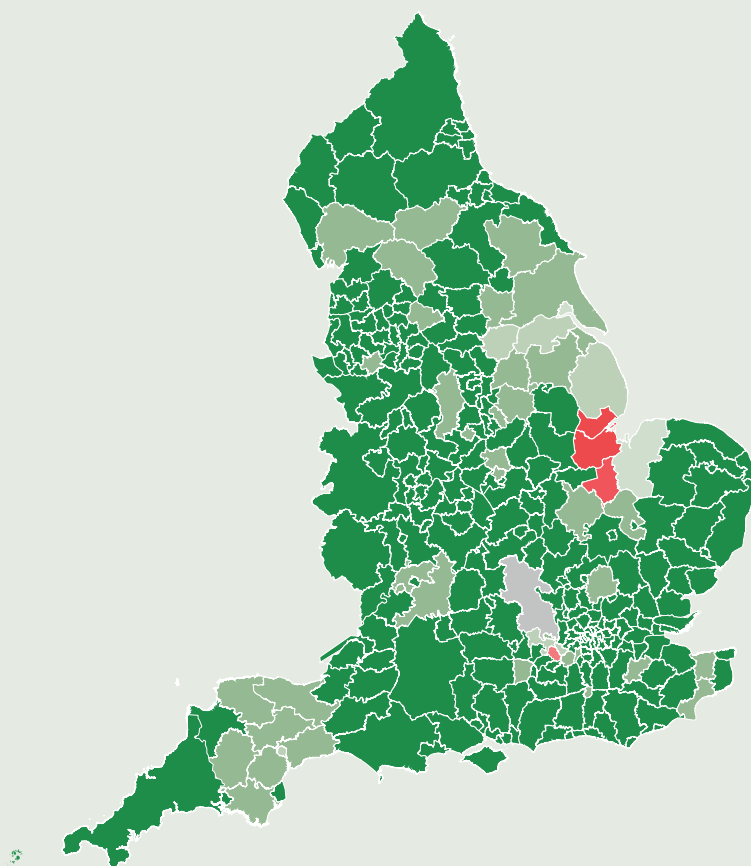
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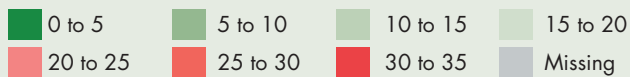
- For councils at high risk of flooding, often on the east coast of England, there is little choice but to build on floodplains to meet housing demand under the current system. Data from DLUHC shows that the number of new houses built on land at the highest risk of flooding has risen from 9,500 in 2013 to 20,000 in 2017-18, following a peak of nearly 24,000 the previous year.

- This is particularly acute in those high-risk districts where 10 percent or more are already at risk of flooding – in South Holland, 34 percent of the district's land is at high risk of flooding. So far in 2021⁵, these high-risk planning authorities have approved **5,283** new dwellings on floodplains, with **4,255** planned in areas identified as highly likely to flood.

Percentage of homes at risk of flooding

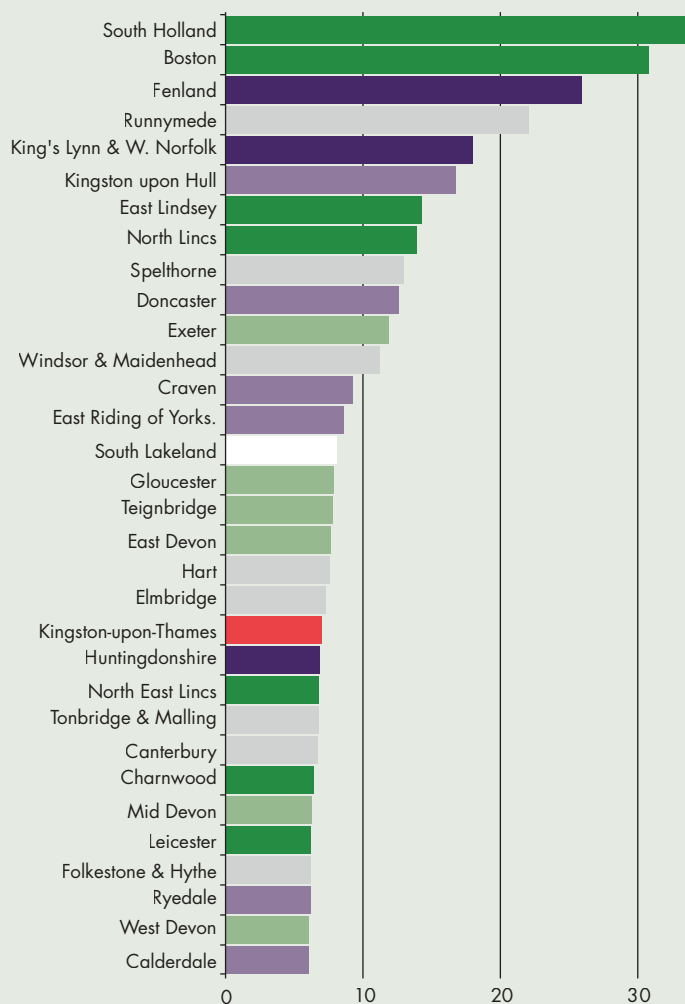


Legend



Top 10% of local authority districts

Proportion of homes at significant flood risk



Region



Source: National Audit office

5 Up to 20th September 2021

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How is UK flooding policy mitigating flood risks?

- In the UK, parliament, the regulatory authorities, and the courts have recognised the dangers of flooding and attempted to address them through regulatory frameworks. Since 2019, the Government has published a National Policy Statement on the issue, alongside the Environment Agency's (EA's) national Flood and Coastal Erosion Risk Management (FCERM) Strategy and Action Plan (2021), the combined aim of which is to ensure resilience in England towards flooding and coastal erosion.
- The strategy recognises that the tools needed to deliver resilience will vary from place to place and that the approach is best designed at a local level. Yet, the strategy overlooks the requirement of local authorities to absorb additional activity proposed without offering additional investments. With councils in England facing an overall funding gap of £8 billion by 2025, it is vital that any new activity arising from the strategy is resourced⁶.
- There has been a relaxation of planning rules regarding floodplain development and no clear policy for how local authorities should effectively account for increasing flood risk in plans and development decisions. Thus, faced with competing interests and institutional agendas such as constraints on building on protected land (e.g. the green belt around urban areas in England) and pressure to meet national housing targets, local authorities in the UK frequently permit new developments in flood zones⁷. The complex nature of this issue – local authorities, under-resourced and under pressure to deliver housing targets, working in something of a grey area – highlights the asymmetrical central-local relationship that exists in this area of governance.
- Attempting to mitigate and adapt to the effects of increased flooding combined with increased housing demand must traverse an uneven and inconsistent policy landscape. Complexity in flood risk and service management is borne from the multitude of bodies involved: the local authority responsible for housing; the county council (if it is a two-tier authority) responsible as the statutory consultee for surface water drainage; the EA responsible for flood risk; and a private water company responsible for drainage. And these roles change in an emergency, further complicating the system.
 - Additionally, at the macro central government level, the planning reforms are being led by DLUHC, but flood risk management is led by DEFRA which presents a disconnect and need for greater coordination at a central government level for planning reforms and future development.
- Due to the defunding of local authorities since 2010, just 12 percent of local authorities strongly agree that they have the skills and expertise to take account of flood risk now and in the future in planning decisions⁸. Despite over 60 percent of councils declaring climate emergencies, local authorities have a critical shortage of skills and expertise in relation to planning for climate change.

What approaches are available to determining effective flood management strategies?

- In determining effective strategies, decisions-makers need to look at enhancing the resistance of the system, the resilience or consider refraining from development on floodplains entirely.
- **Resistance:** The traditional strategies in developed countries, focusing mainly on the hazard of flood risk by aiming at flood prevention, can be considered resistance strategies⁹. Resistance strategies involve uncertainties by assessing and including them in the flood probability while over-dimensioning flood prevention structures. However, with increasingly heavy rains and rising sea levels due to climate change, as Environment Agency Chair, Emma Howard Boyd points out: "we cannot win a war against water by building higher flood defences".

6 <https://www.local.gov.uk/sites/default/files/documents/050719%20LGA%20response%20to%20draft%20FCERM%20strategy%20FINAL%20docx.pdf>
7 <https://www.lse.ac.uk/granthaminstitute/wp-content/uploads/2020/10/working-paper-353-Roezer-Surminski.pdf>
8 <https://www.tcpa.org.uk/blog/blog-loss-of-skills-and-power-is-local-government-critically-unprepared-for-the-climate-crisis-jessi>
9 https://iwra.org/member/congress/resource/MADRID2003_KARIN_DE_BRUIJN_EN.pdf

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- **Resilience:** The Environment Agency emphasises the importance of resilience in their latest report – “it is a case of adapt or die”¹⁰. Resilience strategies focus on living with floods instead of preventing them, relying on a flexible response to floods and a rapid recovery from them¹¹. The new FCERM Strategy has several commitments for the EA to improve resilience to flood risk and encourage long-term adaptive planning.
 - Flood resilience works on multiple scales, and to ‘Build Back Better’, it must be remembered that a flood resilient building is only the beginning. Resilience must extend to wider infrastructure, flood defences, flood action plan and throughout communities. Communities need to understand
- their risk to flooding and coastal change, know their responsibilities and how to act. To be truly effective, principles of resilience must be ingrained among the public and throughout every aspect of society taking into consideration both the immediate flood risk and the future.
- **Refrain:** The Public Accounts Committee advocate for legislation to change planning policy and halt building in areas vulnerable to flooding citing increasing flood risk, funding concerns and gaps in flood protection. However, being an island with limited capacity to meet growing housing demand, opting out of building on floodplains is not the most realistic or practical option for the UK.

What does the national government need to do to enhance planning strategies and flood risk management?

- Resilience and adaptation need to be the priority both for the immediate and future flood risk. Governments, businesses, and society must embrace and invest in adaptation, rather than live with the costs of inaction¹². The planning reforms and spending review will be tests for flood risk management.
- Planning reforms should be seen as an opportunity to strengthen flood risk planning policy and to ‘Build Back Better’ but currently flood adaptation does not have a strong enough presence. If nothing changes then flood risk adaptation will remain fleeting and ineffective.
 - Floodplain development should be avoided wherever possible and if not, should be accompanied by a suite of flood defences and resilience measures to be guided by an appointed Local Authority Chief Resilience Officer.
- Currently the country is in a period where focus is understandably on building and recharging the economy. Yet, equal focus must be placed on good adaptation, placemaking and ‘building back better’. There is a trade-off with investment in every aspect – projects, skills, capabilities – required for adaptation and resilience. This will be a real test for the spending review to overcome.
 - Specific funding should be made available to establish a new cross-departmental task force to look at flood risk development, focussing on capacity and skills training for local authority planning teams.
 - Money must be made available to local authorities to upgrade and maintain flood defences while embedding resilience throughout society.

10 <https://www.gov.uk/government/news/adapt-or-die-says-environment-agency>

11 https://iwra.org/member/congress/resource/MADRID2003_KARIN_DE_BRUIJN_EN.pdf

12 <https://www.gov.uk/government/news/adapt-or-die-says-environment-agency>

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