

building a safer future

a guide for communities on navigating the planning system in england to tackle flood risk



Briefing 7: a community guide to planning practice guidance on flood risk and coastal change



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Briefing 7

A community guide to planning practice guidance on flood risk and coastal change

For those of you who haven't experienced it, flooding is horrendous. It's dirty, invasive, damaging, and it can kill. Whilst flooding can often be short-lived, its effects are long-lasting. Floods can force people to leave their homes and their businesses, destroy livelihoods, natural habitats and other valued places. Even at their best, flooding and coastal change can be inconvenient and disruptive.

If existing development trends continue in line with projected population growth, we're likely to see a doubling of the number of properties built in the floodplain by around 2065. Planning plays a crucial role in ensuring that this trend doesn't result in a doubling of flood damages – and the misery that goes with it.

Sam Kipling, Environment Agency

Introduction

Briefing 3 of this series of guidance introduced the law and **policy** context for planning for **flood risk** in England. This introduced the legal context and key policy documents that decision makers must work within. It also highlighted key elements of policy on the approach to planning for flood risk that are set out in the **National Planning Policy Framework** (NPPF) and **Planning Practice Guidance** (PPG).

A significantly revised PPG on Flood Risk & Coastal Change was published by government in August 2022. This briefing explains the importance of the PPG and highlights key areas of change that may be of interest to communities affected by flood risk.

The role of planning practice guidance in England

The **NPPF** is the core national planning policy document that all **local planning authorities** must follow. It sets out the government's planning policies for England, including its policies on flood risk and coastal change in England.

The **Planning Practice Guidance** (PPG) gives further context and detail to local authorities and developers about how national policy is to be understood and implemented. This includes how requirements on local authorities should be undertaken, for example how technical assessments should be carried out and how evidence should be developed and used.

A glossary of the technical terms used in this guide is appended to this Briefing. The first use of a glossary term in each briefing appears in **bold green** text. Clicking on this text will take you to the corresponding entry in the glossary. Clickable links to external sources of information are set in **bold blue**.

Local Plans must be consistent with the NPPF and it's likely to be a key material planning consideration for decisions on individual planning applications. The NPPF and PPG are intended to be read and understood together. As such the PPG is also capable of being a key material planning consideration.

Why was the PPG updated?

The context of flood risk is changing all the time, as we understand more about the effects of **climate change**, and experience more extreme weather events. Due to the increased risk of flooding, a number of policy reviews have taken place in recent years. The revised PPG incorporates some of the recommendations from these reviews (for example the **Review of policy for development in areas at flood risk, Jenkins Review, Public Accounts Committee** review and **EFRA Committee** review).

The **Environment Agency** (EA) has responsibility for managing flood risk from main rivers, the sea, estuaries and reservoirs. The EA recognises spatial planning as an important tool in the toolbox (see diagram) of measures for improving the **resilience** of places to flooding. The changes to the PPG also mean it is better aligned with the Environment Agency's **National Flood and Coastal Erosion Risk Management Strategy for England**, which outlines the framework under which the Environment Agency and other risk management authorities will manage flood risk (and **coastal erosion**) until the year 2100.

The updates also reflect changes to the NPPF (made in 2018, 2019 and 2021) and learning from practice that has been gathered since the PPG was first published in 2014.



Toolbox of resilience measures to achieve place-based resilience. Image source: The Environment Agency

Key areas of change

Table 1 below provides a summary of some of the key changes to the PPG that commenced in August 2022. This represents an up-to-date position on some of the key ways that planning can help to address flood risk in England.

Table 1:
Key changes to the Planning Practice Guidance on flood risk and coastal change from the August 2022 updates

Topic	Key changes in the updated PPG	What does this mean?
Sequential and exception tests	<p>More clarity is provided about when and how the sequential and exception tests should be applied (see Briefing 3).</p> <p>Definitions for key terms are now included.</p> <p>Roles and responsibilities for carrying out the test are clearer.</p> <p>Advice is included for how local planning authorities can apply the tests more consistently and efficiently.</p>	<p>The clarity should help improve the speed and effectiveness of the sequential and exception tests.</p> <p>Local planning authorities should be clearer about when and how to apply the tests.</p> <p>If local planning authorities follow the advice given, developers should have greater certainty, earlier in the planning process, on whether the tests are likely to be satisfied.</p>
Integrated approach to flood risk management	<p>Encourages holistic consideration of flood risk and how it affects the whole water catchment area. This includes encouraging organisations involved in flood risk management to work together (for example water and sewerage companies).</p> <p>It also encourages stronger links to other studies and plans on water management (such as water cycle studies, drainage and wastewater management plans, river basin management plans and flood risk management plans).</p>	<p>There is more onus on local authorities to ‘join the dots’ and consider the broader strategy for managing too much and too little water when they are considering the location and design of development.</p> <p>It should help inform how development can contribute to achieving the broader water management strategy that is suitable for a particular location. This should help unlock sustainable development and deliver wider benefits for people and wildlife.</p>
Impact of development on flood risk elsewhere	<p>Flood risk assessments will need to consider whether development increases flood risk elsewhere such as through the loss of flood water storage. There is an expectation that development will provide compensatory flood storage in most cases.</p> <p>There is also guidance on how the cumulative impact of development on flood risk can be mitigated.</p>	<p>This guidance makes it clear what measures should be taken to make sure new development does not increase the risk of flooding for nearby communities.</p>
Safeguarding land	<p>Guidance on how to identify and safeguard land that is likely to be needed for flood and coastal risk management infrastructure in the future.</p>	<p>Safeguarding land will make sure that new development won’t prevent or hinder the delivery of future flood and coastal risk management infrastructure.</p>

Table 1:
Key changes to the Planning Practice Guidance on flood risk and coastal change from the August 2022 updates

Topic	Key changes in the updated PPG	What does this mean?
Unsustainable locations and relocation	<p>The guidance is clearer on the types of locations that can be considered unsustainable due to the predicted impacts of climate change on flooding and coastal change over the long-term.</p> <p>The definition of functional floodplain has changed to be more precautionary.</p>	<p>Local authorities will be able to better manage new development to ensure it's not adding to a legacy of development in unsustainable locations.</p> <p>They will be better able to identify existing development that will need to relocate and to take steps to enable this relocation.</p> <p>Areas designated as functional floodplain will get larger. Most development should not be permitted in these areas.</p>
Sustainable Drainage Systems (SuDS)	<p>The guidance is clear that to be considered a SuDS they must provide benefits for water quantity (i.e. reduce flood risk), water quality, biodiversity and amenity.</p> <p>The guidance introduces a clear requirement for information on SuDS to be provided with planning applications in the form of a SuDS Strategy.</p>	<p>The revised definition of SuDS should lead to more above-ground, greener solutions that provide multiple benefits.</p> <p>If a developer is not proposing the use of SuDS on major development or development in a flood risk area, the local planning authority can now require them to provide evidence of why SuDS are not considered inappropriate.</p> <p>The requirement for a SuDS Strategy should encourage developers to think about SuDS much earlier in the development design process. It should also result in a faster and more efficient planning application process.</p>
Reducing the causes and impacts of flooding	<p>More emphasis on the role of natural flood management and other approaches to reducing the causes and impacts of flooding.</p>	<p>Local plans should be used as a key tool to secure a strategic approach to flood management, for example by identifying where new development and green infrastructure can support river restoration, habitat creation and 'slow the flow' approaches to reduce flood risk.</p>

Table 1:
Key changes to the Planning Practice Guidance on flood risk and coastal change from the August 2022 updates

Topic	Key changes in the updated PPG	What does this mean?
Coast	<p>The guidance encourages a more precautionary approach to the designation of coastal change management areas (CCMAs) – areas likely to be effected by coastal erosion over the next hundred years.</p> <p>Guidance provides a clearer requirement for applications to be supported by a ‘vulnerability assessment’ when development is proposed in a CCMA.</p> <p>Guidance enables more flexibility to allow exist-ing development and land-uses within CCMAs to thrive in the meantime before relocation is necessary.</p>	<p>This means local authorities should more rigorously consider the deliverability of Shoreline Management Plans before deciding whether to designate a CCMA. This should reduce the chances of inappropriate development going ahead in areas that could be affected by coastal erosion.</p> <p>Developers should now more carefully consider the risks of coastal erosion at planning application stage.</p>
Surface water flood risk	<p>The ‘design flood’ scenario which developers must consider when locating and designing new development, now explicitly includes flood risk from surface water.</p> <p>Local authorities are encouraged to produce local guidance on how they will account for surface water flood risk, and other sources of risk, when applying the sequential test.</p>	<p>The location and design of new development should now be better informed by an understanding of surface water flood risk.</p>

Glossary

Climate change

The long-term change in weather due to human activity. Global temperatures are continuing to increase, and extreme weather events are becoming more common.

Climate change allowances

Predictions of anticipated change in peak river flow, peak rainfall intensity and sea level rise caused by future climate change. Local Planning Authorities must consider local climate change allowances when preparing Strategic Flood Risk Assessments. Climate change allowances are also known as flood risk allowances.

Coastal erosion

The loss of land along the coast due to the action of waves, tides, currents, and wind-driven sea water over time. Over a long period it is possible that homes and even whole villages will fall into the sea as the land retreats.

Coastal flooding

Seawater flooding of an area of land on the coast, often caused by a severe storm which forces excessive quantities of sea water onto the land.

County Council

A form of elected local government for a county area, responsible for functions such as education, but also minerals and waste planning.

Department for Levelling Up, Housing and Communities (DLUHC)

The UK government department responsible for housing, communities and local government in England (formerly known as the Ministry of Housing, Communities and Local Government).

Design flood

This term is given to the hypothetical flood scenario that designers and engineers will use to inform how buildings and places should be designed to cope with flooding situations. This should include an appropriate allowance for climate change.

Developer/property developer

A company that purchases land to be used for new development, such as housing and, usually, undertakes the building of (for example) houses and the development of other infrastructure.

Development

Building on or carrying out other industrial activities on an area of land. In the planning system, it most often refers to the building of new homes.

Environment Agency

Public body with oversight of the management of all sources of flooding and coastal erosion – although it is directly responsible only for managing the risk of flooding from main rivers, reservoirs, estuaries, and the sea. It advises on Strategic Flood Risk Assessments and site-specific flood risk assessments, and on the appropriateness of a proposed development.

Flash flooding

Rapid flooding of low-lying areas. It may be caused by heavy rainfall or by meltwater from heavy snow or ice. The impact is usually worse in built-up areas, where there are fewer permeable surfaces for the flood water to drain away.

Flood and Coastal Erosion Risk Management Strategy for England

A document (issued in 2020) setting out what needs to be done by all Risk Management Authorities involved in flood and coastal erosion risk management in England – see [here](#).

Flood defences

Structures designed to prevent flooding or control flood water in order to minimise the harm to people and property.

Floodplain

A flat, low-lying area next to a body or bodies of water prone to flooding.

Flood risk

The combination of the likelihood of a flood event occurring and the impact that the flood would have if it did occur.

Flood Zone

A system of four Flood Zones – called 1, 2, 3a, and 3b – is used to indicate the probability of flood risk, ignoring the presence of any flood defence. Areas in Flood Zone 1 are least likely to flood, with areas in Flood Zone 3 most likely. A map on the Environment Agency's website indicates the Flood Zone in which a property is located – [available here](#). Flood Zones do not take into account flood risk from sewers, ground or surface water, or reservoirs.

Fluvial flooding

Flooding caused when the water level in a river, ditch or stream overflows.

Green infrastructure

A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

Groundwater flooding

Flooding caused by a rise in the level of underground water (known as the water table) to above ground level, as a result of prolonged or heavy rainfall. Groundwater flooding tends to happen gradually and can last much longer than other types of flooding as the water cannot drain into the saturated ground.

Lead Local Flood Authority (LLFA)

An area's Lead Local Flood Authority is either the County Council or the Unitary Authority. Lead Local Flood Authorities are required to provide advice on all planning applications for major development involving surface water drainage. They provide advice on how developments manage surface water drainage and use sustainable drainage systems. LLFAs may also choose to provide advice on flood risk from local sources of flooding, such as surface water and groundwater.

Local Plan

The plan for future development in your local area, prepared by the Local Planning Authority. It includes maps of where new housing, other development and infrastructure are to go, and also contains policies prescribing the sort of things that can and cannot be built and rules on the quality of anything that is built. A planning application will be accepted much more easily if it is in line with the Local Plan. But planning permission can be given to proposals in areas not allocated in the plan if a substantial case is made.

Local Planning Authority (LPA)

The council (or National Park Authority in some cases) that carries out planning functions for your local area. In areas where there is both a County Council and a District Council, it is the District Council that prepares the Local Plan.

Main river

Main rivers are the main watercourses shown on the statutory main river maps drawn up by the Environment Agency and the Department for Environment, Food and Rural Affairs.

Major development

For residential development, any development consisting of ten or more residential units.

Minor development

For residential development, any development consisting of nine or fewer residential units.

National Planning Policy Framework (NPPF)

Document setting out the government's planning policies in England, and outlining how they should be applied. The NPPF must be taken into account by the Local Planning Authority when drawing up a Local Plan and in making decisions on planning applications. The NPPF is available [here](#).

Natural flood management

The use of natural processes to minimise the impact of flood events. Examples include restoring bends in rivers to allow more water to be carried, and changing the way that land is managed so that the soil can absorb more water.

Ordinary watercourse

Any watercourse not designated as a main river.

Planning application

A document (physical or electronic) completed by a person, a group of people or an organisation to request permission from the Local Planning Authority to build something new or make a change to an existing building or structure.

Planning permission

Formal permission from a Local Planning Authority for either a new development or a change to an existing building.

Planning Practice Guidance (PPG)

National guidance on various topics of relevance to the planning system, including climate change and flood risk. It is intended to be read alongside the National Planning Policy Framework and must be considered by planners when preparing the Local Plan and in decision-making on planning applications. The full Planning Practice Guidance set is available [here](#).

Planning system

The set of processes which together are intended to ensure that development happens in the right place and at the right time, to the benefit of people, the economy, and the environment. These processes are multiple, complex, and carried out by a number of different organisations – mostly public bodies.

Policy

A set of ideas or a plan of what to do in particular situations that have/has been officially established by national or local government.

Resilience

The capacity to withstand or recover from a disaster or emergency such as flooding.

Risk Management Authorities (RMAs)

Public bodies, including the Environment Agency and Lead Local Flood Authorities, who work with communities to manage the risk of flooding from rivers, the sea, surface water, groundwater, and reservoirs.

Site-specific flood risk assessment

An assessment of flood risk on and resulting from a development site, carried out either by or on behalf of a developer as part of a planning application. The Local Planning Authority receiving the planning application uses the assessment to help determine whether to grant or deny planning permission.

Slow the flow

An approach to land management that uses a range of natural measures to store more water in the landscape and slow down water passing downstream.

Statutory consultee

An organisation that must be consulted and provide a substantive response to a Local Planning Authority concerning a planning application, prior to a final decision being made.

Strategic Flood Risk Assessment (SFRA)

The process of collecting information about the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change. It assesses the impact that land use changes and development in the area will have on flood risk. Environment Agency guidance on producing a Strategic Flood Risk Assessment is available [here](#).

Surface water flooding

Surface water flooding occurs when water that has fallen onto the ground flows over impermeable surfaces, or accumulates in low spots, and the capacity of drainage systems is exceeded. It is very difficult to predict, as it is usually caused by very localised, intense storms which overwhelm surface water sewers and drainage systems. These flash floods typically occur and then disappear in a short space of time, but they can still be devastating if they get into our homes. The risk of surface water flooding can be exacerbated by sealing previously permeable surfaces (paving over gardens and other green spaces, for example), with the result that water can no longer soak away into the ground.

Sustainable drainage system (SuDS)

A drainage system in which water does not flow directly into the sewer network. Instead, water is stored locally, thus reducing the risk of surface water flooding. High-quality SuDS schemes include trees and/or other vegetation and provide other landscape and amenity benefits for local communities, but sometimes schemes referred to as a SuDS are just a concrete storage tank underneath a car park.

Unitary Authority

A form of elected local government responsible for providing all local government services for that area.



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