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Matter 72: Flood Risk Management

Would Policy SI12 provide a justified and effective strategic framework for flood risk management in London? In particular:

a) Would it provide a justified and effective strategic framework for the preparation of local plans?

Yes. We consider that Policy SI12 would provide a justified and effective strategic framework for the preparation of local plans. There are appropriate policy references to the draft Regional Flood Risk Appraisal (RFRA)¹, and to the Thames Estuary 2100 Plan which provide further levels of detail to inform local authorities' preparation of Strategic Flood Risk Assessments, and local plan policies. These documents will inform flood risk appraisal across borough boundaries, particularly in areas designated for growth.

We welcome the Plan's emphasis on partnership working to achieve flood risk management objectives for all sources of flooding. We support the policy as revised in the Mayor's Suggested Minor Changes to the Draft London Plan, which align with the recommendations of our March 2018 response that the policy wording be strengthened around development being set back from defences, and the promotion of natural flood management methods. In particular, we note the added reference to Local Flood Risk Management Strategies at SI12 B, which will further inform planning decisions at a local level. We also welcome acknowledgement of the multiple benefits of natural flood management methods at SI12, point FA, and explanatory paragraph 9.12.5.

We consider that Policy SI12 appropriately sets out the broad requirements for improving London's flood risk. By encouraging a riverside strategy approach, flood risk will be considered at the same time as the wider riverside environment which in turn can help achieve the Mayor's 'good growth' objectives for creating a healthier, more resilient, city, particularly in the context of the Plan's transport, and green infrastructure policies.

¹ EIP document NLP/SI/014

² Thames Estuary 2100 Plan:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322061/LIT754_43858f.pdf

Encouraging flood risk to be considered early in development plans, and the promotion of development plans and developers' contribution to the measures set out in the Thames Estuary 2100 Plan will contribute to the Mayor's objectives for creating economic growth, and a healthier city, particularly in the context of the Plan's transport, and green infrastructure policies being met.

We note the Mayor's published response to Panel Note No.2, Preliminary Question (PQ) 11, and confirm that following further discussions with us changes were made to the Mayor's published Regional Flood Risk Appraisal. The changes address concerns we raised in our March 2018 response to the Plan in regards to the application of the flood risk Sequential Test, climate change response, and other matters. We are particularly supportive of the Plan's emphasis - supported by the RFRA - on further analysis of the impacts of climate change being conducted by developers. This will encourage flood risk to be considered early in development plans, thus reducing flood risk, allowing resilience to be built in efficiently in development design, and making the best use of development sites.

b) Would it provide appropriate, justified and effective guidance on development management matters?

We expect the Regional Flood Risk Appraisal (RFRA) to influence the London Borough's Strategic Flood Risk Assessments which in turn inform Local and Neighbourhood Plans, and local decision-making.

We recommend that the Mayor commits to updating the Supplementary Planning Guidance (SPG) on Sustainable Design and Construction, 2014², to reflect the requirements of the draft Plan.

For development management purposes, we consider that the draft Plan, alongside the updated Regional Flood Risk Appraisal provides appropriate, justified and effective guidance on development management matters.

c) Overall, would it provide for the timely delivery and funding of flood risk management?

The policy addresses the need for flood risk to be managed now and into the future, taking into account the impacts of climate change. Developers play a crucial role in reducing flood risk, by considering flood risk early in the design process and making adjustments in design to manage flood risk. Policy SI12 supports this and should ensure that the most sustainable and cost-effective

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/sustainable-design-and-construction>

solutions are delivered. Policy SI12 Part D ensures proposals contribute to the delivery of measures set out in the Thames Estuary 2100 plan and Part F will ensure that access for future maintenance and upgrade of defences is secured.

Although Policy SI12 does not specify a mechanism for how flood risk management can be funded, it does place the emphasis on Lead Local Flood Authorities, the Environment Agency, developers and infrastructure providers to work together to manage flood risk, which is in line with Defra's partnership funding policy. It also requires development proposals to address existing and residual risk, which we support.

It would be beneficial to the Plan's implementation, for it to recognise and support the various mechanisms of funding for flood risk management, and to emphasise the importance of direct beneficiaries of flood reduction projects contributing to the costs of these projects. Examples include, funding secured by Section 106 agreements, and assessment and recognition of flood management infrastructure in Development Infrastructure Funding Studies (DIFS). The funding raised from development may consequently contribute to flood risk reduction in the local communities. These funding mechanisms are currently underutilised, but will become more essential as the future costs of managing flood risks escalates relative to government funding.

In delivering the London Plan, our statement on Matter 93 also refers in regard to our on-going work with the Mayor's teams on ensuring funding for flood risk management infrastructure is addressed. We recommend that further consideration is given in the Plan to the funding mechanisms for flood risk management.

