

Town and County Planning Association evidence for the Sustainability Committee Inquiry into the draft Flood and Water Management Bill

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Town and Country Planning Association
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About the TCPA

The Town and Country Planning Association (TCPA) is an independent charity working to improve the art and science of town and country planning. This response represents the views of our membership organisations and individuals from local authorities, planning academics and practitioners under the policy guidance of the Policy Council.

The TCPA puts social justice and the environment at the heart of policy debate and inspires government, industry and campaigners to take a fresh perspective on major issues, including planning policy, housing, regeneration and climate change.

Our objectives are to:

- Secure a decent, well designed home for everyone, in a human-scale environment combining the best features of town and country
- Empower people and communities to influence decisions that affect them
- Improve the planning system in accordance with the principles of sustainable development

Introduction

The TCPA welcomes the chance to respond to the Draft Flood and Water Management Bill in view of the importance of the issues involved. We note that the approach in the draft Bill takes its lead from the approach advocated by Welsh Ministers for many years.

We agree with the risk-based approach and the three themes of security, service and sustainability. However the TCPA wishes to see a greater emphasis on ensuring a fair share of costs and benefits alongside an obligation on people and organisations in all sectors to conserve water. In doing this they should seek to improve water quality and minimise flood risk.

However, the TCPA wishes to see:

- more emphasis on climate change adaptation (for which there is no explicit provision in the draft Bill);
- more urgency in establishing a research programme on appropriate design and maintenance of SUDs with a view to securing their adoption (possibly jointly England/Wales in view of the similarity of the technical issues);
- consideration of introducing a requirement to retro-fit SUDs in existing housing and commercial areas;
- introduction of subordinate legislation for Wales to require planning permission for permeable surfaces in gardens (back as well as front, though this only applies to front gardens in England currently);
- the requirement for national standards for surface water drainage brought forward if possible (from 2011).

Specific comments:

In response to the specific questions relating to Wales:

Question: Response:

167 - Yes

168 - For LSWMPS the assessment should be done in line with a risk-based approach to identify priorities

169 - Yes

170 - There should be an independent review and assessment of the most appropriate and efficient means of integrating mapping

171 - Yes, provided that WAG policy identifies clear and risk-based priorities for action by each responsible body in Wales, and that data and information is shared to maximise efficiency and minimise duplication

172+3 - The draft appears to set out a clearer division of responsibility than currently exists

174+5 - The role of the FRMW should be extended to ensure consistency with that of the Environment Agency in Wales relating to flood risk

176 - Meeting frequency will depend on workload and modus operandi

177 - The executive status of the FRMW should be retained

178 - Yes

179 - Yes

180 - Yes

- 181 - N/A
- 182 - Yes
- 183 - Yes
- 184 - N/A
- 185 - Yes
- 186 - Local authorities should be responsible for adoption and management of SUDS in Wales
- 187 - Yes
- 188 - Yes