



Campaign to Protect
Rural England
LONDON

Scrutiny into Flooding and the Thames Gateway – May 2005

Comments by CPRE London
April 2005

Introduction

1. CPRE London welcomes the opportunity to contribute to the London Assembly Environment Committee's scrutiny into Flooding and the Thames Gateway. Below we outline the issue of flood defence in the Thames Gateway and make recommendations for action by the Mayor and Local Planning Authorities.

Flood Defence (Thames Gateway)

2. The increasing risk of severe tidal flooding associated with storm surge in the Thames Gateway has received a great deal of media attention, and has generated a great deal of public concern. Concern has also been expressed by the Environment Agency about the increasing risk of fluvial flooding, exacerbated by an increase in the area of land covered by impermeable surface and large areas of the defences in Kent and Essex may be in need of renewal and enhancement. The Association of British Insurers (ABI) has been particularly vocal, making it clear that the issue is real and that it could undermine the delivery of new housing in the Thames Gateway on the scale that the Government intends. CPRE's principle concern with regard to flood risk is that the risks should be managed responsibly so as to enable development to take place in urban areas while avoiding development outside urban areas.
3. CPRE accepts that much of the Thames Gateway benefits from some of the highest standards of flood defence anywhere in the UK and the Government takes the view that the five 'strategic development locations' are adequately protected against tidal flood risk (i.e. capable of withstanding tidal flooding at a level likely only once in one thousand years¹). The Government supports the approach of limiting development to within those areas for the time being, and this is to be welcomed as promoting urban regeneration and protecting the countryside (and it would tend to support the sequential approach set out in PPG3 - *Housing*).
4. However, despite the Government's policy, there is an unfortunate history of flood risk apparently being overlooked in the Growth Areas. The House of Commons Environmental Audit Committee reported that:

'the Environment Agency has raised concerns with us about the level of development that will be at high risk of flooding in the South East as a result of the SCP [the Communities Plan]. It told us that of the 2,811 planning

*applications to which it objected in 2003 and for which it knows the outcome, 323 were permitted by local planning authorities against the Agency's advice. Of these at least 21 were major developments.'*²

5. On the face of it, this record is likely to undermine public confidence in the Government's determination to take the risk of flooding seriously and could lead to inappropriate development outside of urban areas in the Thames Gateway. The Environment Agency's flood risk management strategy³ will not be published before 2008 and, in the meantime, there is serious doubt - at least among the public - that the Government's house building programme in the Thames Gateway is deliverable within the constraints of responsible flood risk management.
6. PPG25 - *Development and Flood Risk* requires lower flood risk areas to be prioritised above higher risk areas⁴. Despite the fact that this is intended to take place within the context of the sequential approach set out in PPG3, there is a risk that PPG3 may be undermined through areas of lower flood risk outside urban areas being prioritised for development in an attempt to avoid the need to enhance flood defences. These dangers are especially real in Kent and Essex where the choice of green field sites is greater than in London.
7. CPRE therefore welcomes the proposal for a Flooding Direction in cases where local authorities are minded to approve major developments despite Environment Agency objections. The Direction should help the Government to realise its policies for countryside protection and urban regeneration by helping to stop development outside urban areas. Within urban areas, however, consistent with PPG3, it will be important that the Direction results in decisions that are consistent with the concept of balanced risk management, rather than seeking to avoid risk altogether by overlooking the potential of urban areas to accommodate new development.

Recommendations

8. The Mayor and Local Planning Authorities should take a strong stance against the provision or enhancement of hard flood defences that would merely facilitate the development of land beyond existing urban areas. Where additional hard flood defences outside of urban areas are proposed, the case for them should not rest on the value of any additional land made available for development. For example, any cost/benefit analysis of the scheme should not take account of resultant rises in land values arising out of increased developer interest and should not assume that developer contributions may be forthcoming in due course.
9. The Mayor of London and Local Planning Authorities should provide for open space throughout the Thames Gateway and beyond to incorporate water bodies such as lakes and ponds for the collection and storage of rainwater that could then be used to supply grey water systems and/or drinking water sources. Wetlands should be used to collect runoff - thereby also helping to mitigate flood risk and local authorities should ensure that this is promoted through the Green Grid initiative.

10. The Mayor of London and Local Planning Authorities should encourage RPBs and LPAs to take a strong stance against the provision or enhancement of hard flood defences that would merely facilitate the development of land beyond existing urban areas. Where additional hard flood defences outside of urban areas are proposed, the case for them should not rest on the value of any additional land made available for development. For example, any cost/benefit analysis of the scheme should not take account of resultant rises in land values arising out of increased developer interest and should not assume that developer contributions may be forthcoming in due course.

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- 1 *Creating Sustainable Communities - Making it Happen.* ODPM, July 2003.
 - 2 House of Commons Environmental Audit Committee. *Housing: Building a Sustainable Future.* First Report of Session 2004-05 Volume I. Para.71.
 - 3 Thames Estuary 2100.
 - 4 A sequential approach is set out in paragraph 30 and Table 1 of PPG25.