

## October 2020 White Paper: Planning for the Future

**In summary: This paper needs to be considerably more climate change/flooding focussed, with absolute guarantees that the designers have a full understanding of the risks ahead and that industry has requested that SUDs including provision for its maintenance, from the onset, be overseen by a new body. Please ensure housing demand numbers, are revised to accommodate COVID impacts and ability to buy/need due to retail change.**

1 I welcome that one of the topics of the proposals is to **improve outcomes of design** to revamp our “our outdated and ineffective planning system”. This agrees with the current flooding risk assessment and predicted clean-up costs, including associated costs with job losses and mental health due to flooding, as regards protecting people from known future flooding is “no longer fit for human habitation”.

2 Proposal 4 (page 27/8, 2.25 point 3), must ensure that the land that is identified and considered for development has a significantly revamped flood risk assessment in the design, to take into account the appropriate flood risk, *unlike now*. A guarantee is needed that the standardisation referred to in Proposal 6, must not be afraid to include the worst-case scenario, which has already happened and exceeded allowances.

For example: note 10.6 in our county’s most intense storm, detailed in the [Coverack Flood Report](#) (p15), specifically states that there is a: “significant discrepancy between design flow estimates derived for extreme floods (0.1% AEP) using standard methodologies and the flows estimated for the July 2017 flood event. The methods used for estimating extreme flows for planning decisions appear to underestimate the conditions experienced on 18 July 2017”

3 It is essential that the drive behind alleviating the issue that “Businesses cannot afford to grow and create jobs” factors in the risks of that growth being harshly quashed by potentially uninsurable flooding events in the future. **Businesses are not ready now** for the current risk. Future risk costs must be calculated and taken into account from the outset.

4 Given the seriousness of climate change that will affect us all deeply, changing our lives beyond anything like we have seen with Covid, I am concerned that the introduction states; “Our reformed system places a higher regard on quality, design and local vernacular than ever before”, it should be bold and clear, from the outset and say; “Our reformed system places a higher regard on **climate change and its consequences**, quality, design, adaptation, mitigation and local vernacular than ever before” in order to grow confidence in society and investors. To state it later in the document is not enough, flooding is only mentioned 6 times in the entire document. The current system does not consider flooding sufficiently at all, and efforts provided by Cornwall Council, UKCP18, IPCC etc, need to be included at the outset and defined clearly in the design, resulting in transparent scrutiny of developer’s drainage designs and after build maintenance and after-market maintenance plans.

5 **This system to build houses to get the economy going (page 27, 2.25), will fail, without climate change and developer’s drainage design being the priority.** We do not even know if effective demand for housing remains, whether people will afford houses, as they may not have the livelihood they had before Covid and whether a mass of redundant retail space will become available to convert to homes. Let’s ensure if they are in a position to buy new homes, they are not going to face another trauma, clearly outlined by the IPCC & CCC.

6 I agree, “Assessments of environmental impacts and viability add complexity and bureaucracy but do not necessarily lead to environmental improvements nor ensure that sites are brought forward and delivered” but do not feel the consultation document sufficiently allows for a robust remedy. Fast tracking is fine, if the design considers and includes the right measures (including mitigation) from CCC, UKCP18, IPCC etc. However, the majority do not know their flood risk, “There is insufficient incentive within the process to bring forward proposals that are beautiful and which will enhance the environment, health, and

character of local areas” which I would consider a priority over being “beautiful”. No building development on this scale will be “beautiful” if it does not allow for logistical **and kind** consideration given to the risks, to robustly apply so society can remain healthy, without which, they will not.

7 If on page 18, 3rd point, 1.18; a new body would be something like the previously hoped for SUDs approval body, this would be most efficient. This needs more detail to clarify the proposal. On the same page “Ensure that each local planning authority has a chief officer for design and place-making, to help ensure there is the capacity and capability locally to raise design standards and the quality of development”. Will this be properly resourced, and will it be someone qualified to understand the projections for flooding? This is not the case in many situations and the officers who do understand this currently have unsustainable and unrealistic resourcing and budgets.

8 I whole heartedly welcome Proposal 12, that the new expert body that will “draw on the expertise of recognised experts with a range of skills, drawn from across the built environment sector” (page 40, 3.11). It is essential that when considering to (page 40, 3.12) “allow some re-focusing of professional skills” it is formed by people who are passionate about a healthy future and have a clear understanding of Earth Systems Science, and the Climate Change Risk Assessment (CCRA) and the 25 Year Environment Plan as a priority. I am concerned that the plan is little mentioned.

9 Proposal 15 gives scope for this, page 44, 3.25 does enable “opportunities to strengthen the way that environmental issues are considered through the planning system” which is crucial. People exist in this system who do not understand the bigger and longer picture. This needs **to go beyond “considering”** CCC, but **totally embedding and reframing clear advice** into a new opportunity to strengthen the way that environmental issues are considered through the planning system, critically building carbon neutral homes. “*We welcome the Committee on Climate Change’s response to the consultation and we have considered the points they raised*” (page 45, 3.33), *likewise the with the Environment Agency* (page 58, 5.30).

10 If on page 19, 1.20; “Fifth, to ensure more land is available for the homes and development that people and communities need, and to support renewal of our town and city centres, we propose:” 3rd point,” to promote competition amongst developers” that is **simply and clearly, enforceable if not clear from the onset, must include instruction to include sustainable drainage systems, with maintenance plans, with rainfall and flooding predictions well planned for**. There is minimal reference to biodiversity and developers should be steered towards natural flood management systems, as the norm, alongside the 25 Year Environment Plan. This is essential if page 20, 1.24; “Innovators, entrepreneurs and businesses will benefit from a planning system that is much more adaptable to the **changing needs of the economy**” **because the needs of the economy are to not suffer another shock that is well documented**. We cannot consider page 20, 1.24; “our **children and grandchildren**”, **if we do not consider their mental health, well-being, economic viability to exist**, if they do not have homes and businesses resilient to the clearly known flood (& storm) risks.

11 Anyone interested in the last decade of change regarding the above, and the wealth of input from the entire related industry to ensure that the developer does not profit from society suffering, but instead the developer embraces natural capital and using it wisely to enable safe building for society, please visit <https://climatevision.co.uk/planning-and-flooding>

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