

Committee on Climate Change  
Adaptation Sub-Committee  
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Rt Hon Greg Clark MP  
Minister for Planning, Department of Communities and Local Government  
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*Dear Greg*

**Adaptation Sub-Committee's Advice on Draft National Planning Policy Framework**

I am writing to summarise the Adaptation Sub-Committee's (ASC) advice on the draft National Planning Policy Framework in response to your Department's consultation. When I met with Richard McCarthy, the Director General with responsibility for planning, he suggested that I write to you setting out the implications of the ASC's work for the draft National Planning Policy Framework.

**Results to date**

The ASC's first report<sup>1</sup> identified the importance of the land use planning system for adaptation. It highlighted that planning decisions can directly help to increase resilience to climate risks such as flooding and drought, but can also lock future generations into a development pathway that increases vulnerability or one that will be very costly to maintain or reverse. We also noted that from an adaptation perspective, the land use planning system is one of the most important functions delivered by local government.

For our second report,<sup>2</sup> we reviewed the contribution of the land use planning system to the UK's adaptation effort by assessing development patterns in a sample of local authorities over the last ten years. We found that there has been continued development in the floodplain and in areas of eroding coastline consistent with the national picture, where since the late 1980s around 10% of all new dwellings have been constructed in high flood risk areas. We also found that the area of hard surfacing in the urban authorities we sampled had increased and this corresponded with a fall in the amount of greenspace. These trends

<sup>1</sup> Adaptation Sub-Committee (2010) *How well prepared is the UK for climate change?*  
<http://www.theccc.org.uk/reports/adaptation/1st-progress-report-2010>

<sup>2</sup> Adaptation Sub-Committee (2011): *Adaptation in the UK - Measuring progress*  
<http://www.theccc.org.uk/reports/adaptation/2nd-progress-report-2011>

have the potential to be increasing the UK's vulnerability to the impacts of climate change, particularly from flooding.

Another key finding from our analysis was that practically all (96%) of the major development applications in flood risk areas we sampled had at least one flood resilience measure, such as raised floor levels, as well as measures to manage surface run-off, such as SuDS. Local authorities appear to be relying on these types of property-level measures, alongside wider investment in community-scale flood management schemes, to offset the increase in vulnerability caused by development in the floodplain.

From our small sample we did not find evidence of local authority planners transparently assessing if property-level measures and flood defences would in fact be sufficient to offset this potential increase in vulnerability. As climate change and sea level rise are likely to increase the frequency and magnitude of flood events over the course of this century, we can expect future damage and disruption when defences are breached. Furthermore, increasing reliance on defences will lock-in long-term maintenance costs for the lifetime of the development they are protecting. We found that, in taking strategic decisions on the location of new development, planners are generally not weighing up these long-term costs against the benefits from development in flood risk areas that are more immediately realised, such as avoiding blight or regenerating derelict land.

In conclusion, our analysis to date suggests that planning policy in relation to adaptation has successfully enabled the use of property-level flood resilience measures, but has had less influence on strategic locational decisions. It is not clear to us how far planning policy has enabled local authorities to account explicitly for the long-term costs and damages from climate change in drawing up local development plans.

#### **Implications of ASC's findings for draft National Planning Policy Framework**

A number of provisions and policies in the draft framework are sensible from an adaptation perspective and will give local decision-makers clear guidance on how they should account for climate change risks. These include:

- Adaptation being a strategic priority for local development plans.
- The requirement on local planning authorities to demonstrate successful cooperation, particularly on issues that cross administrative boundaries and relate to strategic priorities (i.e. including adaptation).
- The policy that new development should be planned to avoid increasing vulnerability to impacts arising from climate change and when development is brought forward in vulnerable areas that care should be taken to ensure that risks

- can be managed through suitable adaptation measures, including green infrastructure.
- The retention of a sequential, risk-based approach that aims to steer development to areas with the lowest probability of flooding and that takes account of the impacts of climate change.

However, as our analysis to date shows, while the planning system sets out sensible principles on adaptation (and has done so for several years), it is not clear that these principles are being applied robustly or consistently.

Therefore we advise that in finalising the National Planning Policy Framework, the Government should consider how the planning system can enable local decision-makers to explicitly weigh up the long-term costs of climate change impacts against the social and economic benefits from development that are more immediately realised. We suggest that the test for examining the 'soundness' of local plans should include the need to explicitly account for the implications of climate change, alongside the range of other priorities and issues facing communities.

I am copying this response to your colleague Andrew Stunell MP. I met with Andrew at the end of last year to discuss adaptation in relation to CLG policies. We are meeting again this month to discuss a forthcoming Ministerial Green Breakfast session on adaptation to climate change, which is being chaired by the Secretary of State for Defra and at which we are both presenting.

I trust that this advice will be of use to you and your colleagues when finalising the policy framework. May I take the opportunity to place on record my gratitude to your officials for their assistance over the last year or so.



Lord Krebs Kt FRS  
Chair  
Adaptation Sub-Committee  
Committee on Climate Change

Cc  
Andrew Stunell MP  
Richard McCarthy