

UK Planning and Flood Risk: National Flood Forum Position Statement

Our Position

We support the urgent need to deliver new and affordable homes but **building in areas of current or future flood risk is putting people at avoidable harm**. Planning decisions must give greater priority to flood risk and long-term sustainability, ensuring homes are safe, resilient, and insurable in a changing climate.

Too many new homes continue to be built in flood-prone areas, with residents exposed to physical, financial, and emotional impacts—and with new builds excluded from the **Flood Re** insurance scheme. Without stronger controls, the planned volume of new development risks worsening flooding for both new and existing communities.

We believe the Government must **stop inappropriate development in flood-risk areas**, enforce stricter planning controls on developers, and **urgently implement Schedule 3 of the Flood and Water Management Act** to make **Sustainable Drainage Systems (SuDS) mandatory** in England. With the right policies, enforcement, and investment, housing growth and flood resilience can—and must—be delivered together.

Key Concerns of current UK planning:

- 1. New homes continue to be built in flood-risk areas**, increasing exposure for residents.
Independent analysis shows that *one in thirteen* new homes (around 110,000 properties) built in England over the past decade are in flood-prone areas, with this rising to *one in nine* for homes built between 2022-2024.
- 2. Flood risk is not given sufficient weight in planning decisions**, with housing delivery pressures overriding safety.
Planning bodies and policy researchers report that the planning system continues to permit development in Flood Zone 3 and other high-risk areas despite clear national policy to avoid such locations.

4. New-build homes are excluded from the Flood Re insurance scheme, leaving households exposed to unaffordable or unavailable flood insurance.

Flood Re eligibility rules explicitly exclude properties built after 1 January 2009, with evidence showing many new-build homes in flood-risk locations are therefore potentially uninsurable.

5. The planned withdrawal of Flood Re by 2039 poses a major risk, with no clear alternative in place.

Parliamentary briefings and insurance sector analysis warn that without reform, high-risk households could face a return to unaffordable premiums and insurance withdrawal.

6. Schedule 3 of the Flood and Water Management Act has not been implemented in England, leaving Sustainable Drainage Systems (SuDS) optional rather than mandatory.

Government reviews and professional bodies confirm that Schedule 3—intended to require SuDS in new developments—remains uncommenced in England, unlike in Wales.

7. Poorly designed or sited developments increase flood risk for existing communities, particularly through unmanaged surface water runoff.

Evidence shows urban development and increased impermeable surfaces significantly raise runoff rates, overwhelm drainage systems, and increase flooding downstream and in neighbouring areas.

8. Local authorities lack sufficient powers, resources, and capacity to enforce flood-risk protections and sustainable drainage effectively.

Reviews of Schedule 3 implementation highlight resource constraints, skills gaps, and unclear responsibilities as barriers to effective local regulation and maintenance.

9. Climate change is increasing flood frequency and severity, yet new development is not consistently future-proofed.

The Environment Agency forecasts a substantial rise in river, coastal, and surface water flood risk driven by climate change, with millions more properties at risk by mid-century.

National Flood Forum Call to Action

We believe the Government must:

- **Stop new homes being built in areas of current or future flood risk**
- Enforce **strict planning controls** on developers
- **Urgently implement Schedule 3**, making SuDS mandatory in England
- Provide **adequate funding and capacity** for Local Authorities to deliver and maintain drainage systems
- Ensure new homes are **safe, insurable, and resilient** in the face of climate change

Housing delivery and flood resilience are not competing priorities. With the right policy framework and enforcement, **we can and must deliver both.**