

National Planning Policy Framework (NPPF): Position Statement by the National Flood Forum (NFF)

Our Position

The National Flood Forum (NFF) supports the **National Planning Policy Framework (NPPF)** as a vital policy for managing flood risk in England. Its provisions on Flood Risk Assessments, the Sequential and Exception Tests, and sustainable drainage systems (SuDS) provide an important foundation for protecting communities.

However, the NFF is concerned that **weak enforcement, inconsistent Flood Risk Assessments, limited uptake of SuDS, and development pressures** are undermining the NPPF's effectiveness in practice. As a result, planning decisions are too often failing to protect people and properties from flooding.

We believe stronger statutory protections, higher assessment standards, and meaningful community involvement are urgently needed to ensure planning decisions genuinely reduce flood risk and support long-term community resilience.

Key Concerns of National Planning Policy Framework (NPPF):

1. Lack of Statutory Enforcement

The NPPF's flood risk measures, including the Sequential and Exception Tests, are policy guidelines rather than legally binding requirements. This weakens their enforceability, allowing inconsistent application across local authorities and the potential for developments in high-risk flood zones.

2. Variable Quality and Inconsistency of Flood Risk Assessments

Flood Risk Assessments (FRAs), a cornerstone of the NPPF's flood risk approach, vary widely in quality. Many FRAs lack robust analysis, fail to incorporate future climate change projections adequately, or focus narrowly on site-level risks without considering broader catchment impacts.

3. Insufficient Implementation of Sustainable Drainage Systems (SuDS)

While the NPPF encourages SuDS, the failure to fully implement Schedule 3 of the Flood and Water Management Act 2010 in England leaves a critical gap in statutory requirements for effective surface water management. Without mandatory SuDS and adequate local authority support, flood risks remain elevated.

4. Pressure to Deliver Housing Over Flood Safety

National housing targets and development pressures often result in flood risk policies being overridden or diluted. This can lead to a postcode lottery in flood risk protection and increases community vulnerability.

5. Limited Community Involvement and Transparency

The technical nature of flood risk planning decisions and lack of accessible communication reduce public understanding and engagement. Communities frequently report feeling excluded from decisions that directly affect their flood risk and safety.

National Flood Forum Calls to Action:

- **Strengthen Legal Status of Flood Risk Protections**

The government must embed key flood risk management measures such as the Sequential and Exception Tests into statutory planning law to ensure consistent and enforceable application.

- **Improve Flood Risk Assessment Standards**

Introduce national minimum standards for Flood Risk Assessments and independent review mechanisms, requiring them to incorporate climate change projections and consider catchment-wide impacts.

- **Urgently Implement Schedule 3 SuDS Requirements**

Full statutory implementation of SuDS is essential, accompanied by clear national guidance, funding, and capacity-building for local authorities to enforce and maintain drainage infrastructure.

- **Balance Housing Delivery with Flood Resilience**

Housing targets must not undermine flood safety. Development should avoid high-risk flood zones, prioritise flood resilience, and integrate long-term community protection in planning decisions.

- **Enhance Community Engagement and Transparency**

Local authorities and developers should ensure flood risk information and decisions are communicated clearly and accessibly, involving communities meaningfully in the planning process.