



RTPI

mediation of space · making of place

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Registered as a charity in
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**Michael Francey,
PPS 15 Review Consultation,
DOE Central Policy and Resources Group,
23 Castle Place,
BELFAST
BT1**

Date: 28th¹ September 2010
Our ref: BS. PPS.PPS 15

Dear Michael Francey

Northern Ireland Branch of the Royal Town Planning Institute's response on the request for comment on the launch of the review of PPS 15 Planning and Flood Risk.

Thank you for the opportunity for the Royal Town Planning Institute in Northern Ireland to respond to the start of the review of PPS 15.

The Institute is the largest professional body representing spatial planning and represents over 22,000 professional planners in the public and private sectors. The Institute has over 500 members in Northern Ireland and we would like the views of these members taken into account in respect of the pending review of PPS15.

The Review of PPS 15 was the subject of discussion at the RTPI NI Branch Executive meeting on 9th September. It was noted that the announcement of the review by the Minister was only the start of the process and that more formal consultation will follow. RTPI NI would welcome participation in the forthcoming review process and will provide more detailed comment later when drafts are presented for consultation.

The Executive Committee felt that it was important, at this early stage, for the Department to note previous RTPI policy statements, in the English and Welsh context, for the **Flood and Water Management Bill and PPS 25 Development and Flood Risk**.

In July of this year, the RTPI, in conjunction with ICE, CIWEM, RIBA, RICS, RUSI and the Landscape Institute, drew up a joint policy statement to inform and guide their members and the wider industry on flood issues particularly in urban areas. The statement includes six policy issues, nine recommended measures and other actions recommended by the institutes. A summary of these points is made below and RTPI NI suggests that the Department consider these points during the review process.

Policy

1. The role and responsibility of each stakeholder organisation engaged with urban flood risk should be clear and unequivocal, and there should be a clear hierarchy and line of responsibility between these organisations.
2. Responsible bodies should provide measures to manage flood risk within a national framework of performance standards. Drains, sewers and watercourses should be recognised as having a finite capacity and once this capacity is exceeded flooding will occur.
3. For consistency and comparability common methodologies and terminologies for the assessment of flood risk in urban areas should be shared by all professionals.
4. The results of urban flood risk assessment should be available in a form that enables members of the public to understand the risk they personally face.
5. Flood risk management should tackle all forms of flooding in an integrated way and should fully exploit the amenity potential of water, waterways and wetlands in the urban environment.
6. New development should not increase the risk of flooding either locally or elsewhere. There should be a presumption against development within areas of significant flood risk.

Measures

1. The approach to flood risk management should shift from a reliance on flood defences to a holistic management of risk, combining defence and measures to alleviate the impact of floods. Flood risk measures should include both active measures (physical defences, drains, sewers, changes to building and urban design), passive measures (multifunctional green space that can also act as water storage, planting of grass and trees to increase water infiltration to soil, reinstatement of flood plains) and emergency management measures (flood warnings, emergency management plans, recovery plans)..
2. Structural measures, particularly defence works, should avoid disconnecting one part of a community from another and should preserve visual (and where possible physical) continuity between the community and rivers and coastline. They should also avoid exacerbating flood risk in other areas.
3. Flood risk management measures should be compatible with measures to manage water pollution and with the sustainable management of the whole water cycle.
4. Where practical, surface water should be managed on the surface.
5. Urban areas should be designed to provide adequate surface pathways to convey excess flow safely during extreme events. This includes the need to make adequate space between buildings and to design roads, open space and pathways to act as flood conveyance channels.
6. Buildings in flood risk areas should be designed and constructed to be resistant to flooding and should use flood resilient construction methods and materials. This should also apply to building refurbishment.
7. The introduction of flood risk measures should be used to improve urban environments, avoiding the drawbacks of many traditional responses, which have helped create unappealing and unsafe urban space.
8. The risk of flooding should be recognised as a key constraint to development. New development or regeneration should be seen as an opportunity to change existing land use in urban areas to make space for water.
9. While this policy statement focuses primarily on urban flood risk, the role that rural land can play in helping to reduce flood risk should be recognised. Integrated flood risk management solutions that work with the land and natural environment such as the creation of washlands and wetlands, realigning river channels and reconnecting rivers with their floodplain all help store and slow water to reduce flooding downstream. The role that the uplands have to play should also be recognised as should the benefits that improved land management practices can bring.

Other Actions

1. Household in areas of significant flood risk should be supported in taking self help measures to manage their flood risk. This should include impartial advice on flood-proofing buildings supported by a product kite-marking scheme.
2. There should be an adequate system of warning for urban flooding and an effective plan for actively managing flood events and for recovery after the event.
3. Property insurance should fairly account for flood risk and should reflect local measures taken to manage that risk.

In general terms, RTPI NI welcomes the review of PPS 15 which is now over 4years old and much has happened in the intervening period, with well publicised flooding problems in Northern Ireland last year and changing awareness of flood risk and climate change issues.

I hope you find this early response useful and look forward to further involvement in the formal consultation process. If you require any clarification, or feel you need further comment, please contact me at the above address. .

Yours sincerely,

(Unsigned email copy)

Brian Sore
Northern Ireland Policy Officer