

Review of PPS 15: Planning and Flood Risk

Comments by

Northern Ireland Environment Link

30 September 2010

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 58 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

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General Comments

Northern Ireland Environment Link (NIEL) welcomes the opportunity to comment on the Review of PPS15: Planning and Flood Risk. In our response to the previous PPS15 consultation (April 2005) we welcomed the Department's adoption of a precautionary approach to development and the use of land that takes account of climate change and outlined our support for the policy objectives provided within the document. We commend the Department for fulfilling its commitment to review PPS15 within 5 years of publication in order that we may incorporate and react to the emerging evidence about climate change.

Before making some specific comments on the existing PPS15 document, NIEL would like to make the following overarching comments on how Northern Ireland should address the impacts of climate change:

- Sustainable development – action should respect environmental limits and make efficient use of resources and seek to maximise other sustainability benefits.
- Mitigation - no adaptation measure should contribute further greenhouse gas emissions and where possible should reduce emissions.
- Social equity - everyone should be equally able to adapt and the costs should be shared fairly.
- Natural processes - action should work with not against the grain of nature.
- Long-term perspective - adaptation should be fit for the future and avoid short-term fixes.
- Sound science - decisions should be based on the best available information.

Specific Comments

While our general support for the principles contained within the original PPS15 document remains, NIEL would like to make the following comments on how the existing content of PPS15 can be improved.

Policy Context

The document clearly and correctly identifies the Regional Development Strategy for Northern Ireland 2025 as setting out the strategic planning framework for the promotion of sustainable development on the region and acknowledges that climate change will have implications for lifestyles and the form of development in the future. It is essential therefore that the Regional Development Strategy, which is itself under review, be published without further delay if we are to have the necessary fit-for-purpose framework to tackle climate change.

Implications of Climate Change for Northern Ireland

In addition to the implications for Northern Ireland of climate change as outlined in the document, more recently the Met Office¹ and UK Climate Change Impacts Programme 2009² have stated that the main changes are likely to be an increase in winter rainfall and a

¹ Met office, Briefing Note 6 October 2008

² <http://ukclimateprojections.defra.gov.uk/content/view/1441/543/>

decrease in summer rainfall. However, while there will be an overall decrease in summer rainfall it is likely that a higher proportion of this rainfall will be in the form of short intense bursts. The Met Office³ also notes that while:

“the use of return periods are useful to put rainfall events into a historical perspective, with climate change playing an increasing role in the evolution of current and future weather patterns, the use of return periods should not be used to predict the future likelihood of occurrence. Simply put, the past is no longer an adequate guide to the future”

While the Foresight Future Flooding Report⁴ stated that “the existing standards of protection for urban communities of between 1 and 50 years and 1 in 100 years could degrade to be between 1 in 15 years to 1 in 20 years over the next 50 to 80 years”, recent reviews of the report have indicated that the implications of climate change are likely to be more dramatic than originally thought.

NIEL believes that the current planning and infrastructure arrangements are insufficient to provide defence against flooding. Recent reviews of the Foresight report meanwhile have indicated that the implications of climate change are likely to be more dramatic than originally thought. Furthermore we believe there is increasing evidence that the recent major flooding incidents we have experienced are the result of weather events exacerbated by human planning decisions.

The EC Water Framework Directive

NIEL believes that the requirements of both the Water Framework Directive (WFD) and the Floods Directive which necessitated the production of flood risk assessments, maps and plans, represent a driver for sustainable development and provide a range of useful tools for planners. As part of the Northern Ireland Freshwater Taskforce (FWTF), NIEL has welcomed efforts to coordinate Flood Hazard Maps and Flood Risk Maps and Flood Risk Management Plans with the Water Framework Directive process, and the FWTF has made the following suggestions as to how this co-ordination could be improved, including:

- Flood Risk Management Plan areas should coincide with Local Management Areas or at least Catchment Stakeholder Group, areas as established under the WFD River Basin Management Plan process. This would make public engagement easier as it would allow the Floods Directive process to build upon and strengthen the public engagement structures that already exist.
- River Basin Management Plans will be developed at a smaller scale in the form of 26 Local Management Area Plans to facilitate addressing localised water quality issues and more targeted and effective measures to deal with specific local problems. The FWTF believes that this framework should similarly be adopted for the delivery of Flood Risk Management Plans as it would also allow greater harmonisation and

³ Met Office, Significant rainfall events in Northern Ireland which have resulted in flooding in the last decade, October 2008

⁴ Foresight: Future Flooding (Office of Science and Technology, 2004)

possible sharing of resources for the implementation of Flood Management Plans and Local Management Area Plans.

Sustainable Development Strategy (SDS)

The Sustainable Development Strategy (2006) referred to in the document has recently been updated and replaced by the Northern Sustainable Development Strategy (2010) and its Implementation Plan. While it is frequently mentioned that the delivery of the SDS and its Implementation Plan are crucial for the delivery of action on climate change, a point we would strongly support, the level of concrete action to date has been disappointing. NIEL is therefore concerned that linking delivery of climate change action too closely and exclusively to the delivery of the SDS and SDIP may not be effective.

Northern Ireland Biodiversity Strategy

The document refers to consideration being given to the Northern Ireland Biodiversity Strategy (2002), the key aim of which is to protect and enhance landscape, wildlife habitat and species. Unfortunately however, this Strategy is itself now outdated as although signed off in 2002, it had been in drafted in the late 1990s. The issue of climate change therefore does not feature in the present Biodiversity Strategy as it had not yet emerged as the major issue it has become when the document was adopted in 2002. Given that there is now international recognition that biodiversity and climate change are irrevocably linked, NIEL supports the views expressed by the Northern Ireland Biodiversity Group (NIBG) that the Strategy needs to be completely reviewed to reflect the major concerns relating to climate change. The NIBG 2009 Report⁵ contained 6 specific recommendations on climate change. NIEL would fully endorse all of these recommendations and in particular the call for government to establish a working group on climate change, responsible for advising on reduction of greenhouse gas emissions and on adaptation to the impacts of climate change.

Sustainable Drainage Systems (SuDS)

As a member of the Freshwater Taskforce, NIEL believes that:

- The range of techniques embraced under the banner of SuDS have the potential to bring real long term benefits for people, wildlife and the economy.
- The loss of permeable surfaces is both exacerbating existing drainage problems and creating new flooding problems. This situation is set to worsen given the demands for further development in the future and climate change predictions. Therefore, we strongly support consideration of SuDS as a viable alternative to traditional drainage systems.
- The benefits of utilising SuDS include: flood alleviation; pollution prevention; biodiversity enhancement and aesthetic benefits; water quality enhancement (services such as sedimentation, filtration, biodegradation and uptake by plants) and climate change adaptation.
- All new developments should seek to incorporate SuDS through applications and spatial plans and consideration should be given to retrofitting existing developments to incorporate SuDS where possible.

NIEL believes therefore that SuDS must be adopted and implemented urgently as part of a holistic approach to sustainable development.

⁵ Delivery Of The Northern Ireland Biodiversity Strategy 2005 – 2009, The second report of the Northern Ireland Biodiversity Group

Promoting a Joined-up approach

NIEL welcomed the recognition of the importance of ‘joined up’ thinking in our original consultation response but added this will require translation into action on the ground to be effective. We again call for specific mechanisms to ensure integration should be clearly stated in PPSs and Area Plans to ensure that this is delivered in practice. We are particularly concerned with the cumulative impacts of development, and would encourage integration between this PPS and a range of other PPSs including PPS21 (Sustainable Development in the Countryside).

At a broader level however, NIEL believes that the achievement of a joined-up approach remains unlikely given the on-going uncertainty around a number of key policy areas. We believe therefore that the Northern Ireland Executive needs to clear a number of policy ‘log-jams’ if a joined-up approach is to be achieved and stakeholders helped to engage in forward planning. These policy areas include: clarification around the Review of Public Administration, Planning Reform and the Regional Development Strategy.

Other Comments

As PPS15 currently states ‘*Climate change is expected to increase flood risk, indeed the experience of recent years suggests that the incidence of flooding in the Region, as at national and global level, is already increasing*’, NIEL would like to make the following recommendations on how government can play its part in tackling climate change:

- The Northern Ireland Assembly needs to set legally binding regional targets that would complement the UK Climate Change Bill. Given the well documented reduction in public sector expenditure in the region, targets must be accompanied by a budget which allows these targets to be achieved.
- Climate change governance should be a major consideration in the proposed review of Departmental numbers and functions.
- A single government department and Minister must be allocated responsibility for delivery. A coherent unit on climate change, integrating both mitigation and adaptation strategies and with responsibility for implementing and reporting on progress, is required.
- Take action to support and implement EU, international and UK legislation and regulation, and recommendations, as they develop.
- Immediate action must be taken to prevent the economic impact of climate legislation spiralling in the near future.
- Use a target for a Carbon Neutral Government Estate of 2020 as a driver for action on climate change.
- Empower the public by giving examples of what can be done individually and collectively.
- Implement in full the recommendations of the Environment Committee Inquiry into Climate Change.