

Armagh City, Banbridge &  
Craigavon Borough Council

# Local Development Plan 2035

## Draft Plan Strategy

TECHNICAL SUPPLEMENT 15

# Flood Risk and Drainage

September 2026



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Armagh City  
Banbridge  
& Craigavon  
Borough Council

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# Introduction

## Purpose of this document

This Technical Supplement brings together the evidence base that has informed the preparation of the Armagh City, Banbridge and Craigavon Borough Council's Local Development Plan (LDP) 2035 draft Plan Strategy (dPS). It is one of a suite of topic based Technical Supplements that should be read alongside the dPS to understand the rationale and justification for the planning policies proposed within it.

This Technical Supplement includes key updates relating to flood risk and drainage in the Borough which have emerged since the publication of the Council's original evidence base Preparatory Paper. These papers provided the baseline information that formed part of the evidence base for the Council's Preferred Options Paper (POP). The POP, published in March 2018, provided an overview of the Key Issues of strategic significance affecting the Borough and the Preferred Options to address them.

This Technical Supplement also seeks to provide an update on the Council's progress in its approach towards flood risk and drainage in the Borough and the development of associated planning policies, since the publication of the POP.

To reflect the broad range of matters that were taken into account in the development of the Council's approach towards flood risk and drainage in the Borough and the formulation of associated dPS planning policies this Technical Supplement has been organised into the following sections:

- **Sections 2 & 3** provide a summary of the Legislative, Regional and Local Policy Context that is relevant to the LDP, with particular emphasis on this topic area;
- **Section 4** provides an overview of flood risk and drainage within the Borough;
- **Section 5** outlines the relevant Key Issue and Preferred Approach as detailed in the POP, alongside a summary of POP Commitments and a summary of some of the POP responses that were received, with a focus on those offering suggestions in respect of policy development.
- **Section 6** provides an overview of the policy review, and the ongoing consultation and engagement that has been carried out in preparation of the dPS policies. Furthermore, it also details the approach of neighbouring councils to flood risk and drainage, briefly outlining their position, followed by a brief consideration of any potential conflict.
- **Section 7** summarises how the dPS policies for flood risk and drainage have been developed. It provides a rationale where amendments have been made to the existing planning policies to take account of regional direction, POP feedback, consultation and engagement, where it has been considered necessary and appropriate to do so.
- **Section 8** sets out how the dPS policies for flood risk and drainage have been prepared in accordance with the tests for soundness set out in the Department for Infrastructure's (DfI) Development Plan Practice Note 6: Soundness (Version 2, May 2017).

The information and data presented in this Technical Supplement has been derived from a number of different sources however, where possible, the most recent datasets available have been utilised.

It is important to note that this evidence base has been collated at specific point in time and therefore it may be necessary for the Council to review and update it as the plan is progressed. The notional end date of the plan period has now been amended to 2035. The Council will continue to work with key stakeholders to ensure that flood risk and drainage in the Borough

are managed in an appropriate and sustainable manner throughout and beyond the plan period of 2035.

### **Flood Risk and Drainage**

Flooding is a natural process that cannot be entirely prevented. The effects of flooding on human activity are wide ranging from pollution and health risk to widespread damage and adverse environmental impacts.

There are four main types of flooding:

- from rivers and watercourses (fluvial);
- from the coast;
- from surface water runoff (pluvial); and
- from reservoir failure.

Some areas are already susceptible to intermittent flooding from various sources; however, it is expected that climate change will increase flood risk in Northern Ireland and it is therefore important to ensure that our new and existing infrastructure is as resilient as possible to all potential impacts.

Planning has an important role to play in flood risk management to prevent future development that may be at risk from flooding or that may increase the risk of flooding elsewhere. To reduce flood risk, improve water quality and quantity, the LDP seeks to promote the development of green infrastructure and the use of sustainable drainage systems (SuDs) in addition to protecting flood defence and drainage infrastructure.

## **2.0 Legislative Context**

The key pieces of legislation relating to this subject area include the following:

### **The Planning Act (Northern Ireland) 2011**

The Planning Act (Northern Ireland) 2011 (hereafter referred to as the 2011 Act) is the principal planning legislation in Northern Ireland, which underpins the reformed two-tier planning system that commenced on 1 April 2015. It introduced the plan-led system, where the LDP is the primary consideration for decision making on all new development schemes, and proposals will be required to accord with its provisions unless, exceptionally, other material considerations indicate otherwise.

### **The Planning (Local Development Plan) Regulations (Northern Ireland) 2015**

The Planning (Local Development Plan) Regulations set out the sequence in which the Council's new LDP is to be prepared and provides detail on the content and procedure of each stage in the plan preparation process and independent examination.

### **Water (Northern Ireland) Order 1999**

DAERA NIEA's Water Management Unit (WMU) under the Water (Northern Ireland) Order 1999, has a duty to promote the conservation of the water resources of Northern Ireland and the cleanliness of the water in waterways and underground. In doing this, the NIEA must take into account the needs of industry and agriculture, the protection of fisheries, the protection of public health, the preservation of amenities, and the conservation of flora and fauna.

The WMU protects the aquatic environment within the Borough through a number of activities including:

- Monitoring water quality;
- Preparing water quality management plans;
- Controlling effluent discharges;
- Taking action to combat or minimise the effects of pollution;
- Supporting environmental research; and
- Co-ordinating the updating of river basin management plans with partners.

### **The Water and Sewerage Services Act (Northern Ireland) 2016**

The Water and Sewerage Services Act (Northern Ireland) 2016 received Royal Assent and came into operation on 23 March 2016. Section 4 of the Act extends the powers of NI Water to adopt sustainable drainage systems (SuDs) and to require the construction of SuDS, with Section 5 introducing restrictions on the right to connect new surface water sewers to the public network. Sections 4, 5 and 6 of the Act came into operation two months later, to facilitate the issue of information and guidance to stakeholders, in particular, developers.

### **The Water Environment (Floods Directive) Regulations (Northern Ireland) 2017**

Article 4 of the Floods Directive requires that each member state undertakes a Preliminary Flood Risk Assessment (PFRA) for their respective territories.

Flood Risk Management Plans for Northern Ireland were produced by DfI Rivers to comply with the requirements of the Directive and the Regulations. The Directive places more emphasis on non-structural flood management measures (soft engineering techniques), such as using natural flood plains and wetlands to store water during floods and makes flood management a key part of the river basin management process under the Water Framework Directive.

The Flood Risk Management Plans highlight the flood hazards and risks in the most significant flood risk areas in Northern Ireland from flooding from rivers, the sea, surface water and reservoirs. The Plans identify the measures that will be undertaken over a six-year period, and they set out how the relevant authorities will work together to reduce the risk of flooding.

### **Reservoirs Act (Northern Ireland) 2015**

The regulation of reservoir safety in Northern Ireland is provided for by the Reservoirs Act (Northern Ireland) 2015 which will introduce regular inspection, supervision, maintenance and repair of reservoirs.

The key provisions of the Act are:

- Registration - reservoir managers will be required to register Controlled Reservoirs with the Department;
- Designation - the Department will give Controlled Reservoirs a designation of High, Medium or Low Consequence. The reservoir designation will be informed, in large part, by the impact that an uncontrolled release of water from the reservoir will have on people, property, economic activity, the environment and cultural heritage in the area flooded;
- Commission of reservoir engineers - reservoir managers will be required to commission reservoir engineers, that have been approved by the Department, to supervise, inspect, and construct/alter Controlled Reservoirs;
- Compliance - reservoir managers will be required to comply with recommendations and/or directions made by reservoir engineers.

The Reservoirs Act Northern Ireland (2015) provides for the regulation of structures or areas, capable of holding 10,000 cubic metres or more of water above the natural level of the surrounding land. These are Controlled Reservoirs.

The provisions of the Act will ensure that Controlled Reservoirs are managed and operated to minimise the risk of flooding due to an uncontrolled release of water resulting from dam failure to protect people, the environment, cultural heritage and economic activity.

The provisions of the Act are based on industry best practice for the management and maintenance of Controlled Reservoirs.



**Figure 1: Location of Reservoirs in Northern Ireland (Source DfI 2014)**

## **Department for Infrastructure (DfI) Consultation- legislation to commence and implement the Reservoirs Act (NI) 2015**

Statutory responsibility for the Reservoirs Act transferred to the Department in June 2021. From November 2021 to January 2022, DfI carried out a targeted consultation exercise to seek views on the draft secondary legislation required to further commence and implement the key elements of the management and maintenance regime for reservoir safety provided by the Reservoirs Act (NI) 2015.

The key elements of the legislation include registration, designation, supervision by a supervising engineer, inspection by an inspecting engineer and a requirement to undertake measures in the interest of safety. DfI identifies that this management and maintenance regime will minimise the risk of flooding due to an uncontrolled release of water resulting from dam or structural failure of a reservoir therefore safeguarding human life, the environment, cultural heritage and economic activity.

DfI also sought views on the draft designation criteria which will be used to give controlled reservoirs a reservoir designation. A reservoir designation of either High Consequence, Medium Consequence, or Low Consequence will be given to each controlled reservoir, and this designation will determine the level of regulation and management required by the Reservoirs Act (NI) 2015.

Whilst DfI will publish a report on the Consultation in due course, a high-level review indicates initial concerns regarding: the costs associated with reservoir managers and maintaining the reservoirs in accordance with the legislation; the loss of community assets; and environmental impacts<sup>1</sup>.

<sup>1</sup> Source: Committee for Infrastructure Meeting (Wed 9<sup>th</sup> Feb 22), NI Assembly- Jonathan McKee (Director of DfI Rivers) & Alison Clydesdale (Director of Water & Drainage Policy Division)

Although the completion of the consultation paves the way for commencement and implementation of the Reservoir Act, there is no current timeframe in place.

**Department for Infrastructure (DfI) Consultation on Water, Flooding and Sustainable Drainage (March-June 2022)**

In March 2022, DfI published a consultation paper on proposals to amend legislation to improve water, flooding and drainage legislation.

The purpose of the consultation is to consider how existing legislation should be amended to help reduce pollution in watercourses, strengthen resilience against extreme weather events, such as drought and flooding and introduce more sustainable, environmentally friendly and green solutions to managing water resources.

## 3.0 Policy Context

### Regional Policy Context

The key pieces of regional policy relating to this subject area include the following:

#### **Programme for Government (PfG) 2024-2027 'Our Plan: Doing What Matters Most' (2025, Northern Ireland Executive)**

The PfG 'Our Plan: Doing What Matters Most' outlines the NI Executives priorities for making a real difference to the lives of everyone living and working in Northern Ireland. It sets out the following three long term Missions, underpinned by a cross-cutting commitment to Peace, through which improved wellbeing, long term sustainability, and a thriving economy will be delivered.

People: Working to support everyone at all stages of their life to ensure they have the chance to succeed by improving life opportunities.

Planet: Harnessing the potential of a green growth economy while ensuring we provide an equitable transition to a sustainable and affordable society as we take responsibility for decarbonising our economy and society.

Prosperity: Improving our economic productivity while making sure that we have an economy that works for everyone, and our story continues to be an inspiration to others.

The nine cross-cutting priorities aimed at delivering the PfG missions are as follows:

- Grow a Globally Competitive and Sustainable Economy
- Deliver More Affordable, Accessible, High-Quality Early Learning and Childcare
- Cut Health Waiting Times
- Ending Violence Against Women and Girls
- Better Support for Children and Young People with Special Educational Needs
- Provide More Social, Affordable and Sustainable Housing
- Safer Communities
- Protecting Lough Neagh and the Environment
- Reform and Transformation of Public Services

Within the PfG there are a wide range of actions aimed at addressing the above priorities and delivering the missions, including multi sector investment and reform, the delivery of a Sub-Regional Economic Action Plan, the development of Northern Ireland's Climate Action Plan, publication of the Third Northern Ireland Climate Change Adaptation Programme and the delivery of actions identified within the Lough Neagh Report and Action Plan.

#### **The Regional Development Strategy (RDS) 2035**

The Regional Development Strategy (RDS) 2035 provides an overarching strategic planning framework to facilitate and guide the public and private sectors.

Policy RG12 of the RDS 2035 promotes a more sustainable approach to provision of water and sewerage services and flood risk management. It advises that increased population, changes in household formation and climate change are putting pressure on our water resources and drainage systems. Therefore, the planning for the provision of water and sewage infrastructure and treatment facilities is both a practical and environmental necessity for regional development.

As part of the RDS 2035 housing evaluation framework (which assists judgements on the allocation of housing growth), the “resource test” states that when assessing land to be potentially zoned for housing, consideration must be paid to the water, sewerage and waste infrastructure of an area to ensure that it is adequate to support the provision of future housing.

The key policy aims of the RDS 2035 regarding water (and sewerage) are:

- The integration of water and land use planning. Land use planning should be informed by current water and sewerage infrastructure and the capacity of that infrastructure to absorb future development. This will involve the planning authority working in conjunction with NI Water.
- Manage future water demand by reducing waste. To help manage future water demand in new developments, initiatives such as grey water recycling and rainwater harvesting should be promoted.
- Encourage sustainable surface water management. This will involve the encouragement of initiatives such as Sustainable Development Systems (SuDS) in significant development proposals. SuDS endeavour to use natural systems with low environmental impact (such as trans evaporation) to dispose of dirty water and surface water to reduce the amount of water being released back into watercourses & and drains thereby reducing the risk of flooding.

Flooding is also referred to in a number of other Regional Guidance aims throughout the RDS.

RG1 states that when allocating land to facilitate sustainable economic growth, areas at risk of flooding from river, the sea or surface water run-off should be avoided where possible.

Similarly, RG7 states that in undertaking both urban and rural renaissance, areas at risk of flooding from river, the sea or surface water run-off should be avoided.

RG8 states residential development should not take place in areas which are known to be at risk of flooding. This policy also states that as part of the Housing Evaluation Framework, an assessment of flood risk should be considered when allocating land for housing growth.

RG9 highlights the detrimental impact of climate change on species, habitats and health as a result of flooding, among other things. In regard to adaption, RG9 aims to minimise development in areas at risk from flooding from rivers, the sea and surface water run-off. It recognises that flooding is a natural phenomenon that cannot be entirely prevented. It states that a precautionary approach should be exercised to development in areas of flood risk, identified using the latest flood risk information that is available, and development of towns and cities should occur in a manner that avoids the risk where possible. Additionally, it advocates that developments in areas, even those outside flood risk areas should incorporate Sustainable Drainage Systems (SuDS).

### **Strategic Planning Policy Statement for Northern Ireland - Planning for Sustainable Development, 2025 (SPPS)**

The aim of the SPPS in relation to flood risk is to prevent future development that may be at risk from flooding or that may increase the risk of flooding elsewhere.

The SPPS directs that LDPs should also promote sustainable drainage within the plan area, for example by requiring such solutions, where appropriate to individual zonings, as a key site requirement.

The regional strategic objectives for the management of flood risk are to:

- Prevent inappropriate new development in areas known to be at risk of flooding, or that may increase the flood risk elsewhere;
- Ensure that the most up to date information on flood risk is taken into account when determining planning applications and zoning / designating land for development in LDPs;
- Adopt a precautionary approach to the identification of land for development through the LDP process and the determination of development proposals, in those areas susceptible to flooding where there is a lack of precise information on present day flood risk or future uncertainties associated with flood estimation, climate change predictions and scientific evidence;
- Manage development in ways that are appropriate to the four main sources of flood risk in Northern Ireland, i.e. fluvial, coastal, surface water and water impoundment (reservoir) breach or failure;
- Seek to protect development that is permitted within flood risk areas by ensuring that adequate and appropriate measures are employed to mitigate and manage the flood risks;
- Promote sustainable development through the retention and restoration of natural flood plains and natural watercourses as a form of flood alleviation and an important environmental and social resource;
- Promote sustainable development through encouraging the use of sustainable drainage for new development and redevelopment / regeneration schemes;
- Promote public awareness of flood risk and the flood risk information that is available and of relevance to undertaking development; and
- Promote an integrated and sustainable approach to the management of development and flood risk which contributes to:
  - the safety and well-being of everyone,
  - the prudent and efficient use of economic resources,
  - the conservation and enhancement of biodiversity, and
  - the conservation of archaeology and the built heritage.

The SPPS emphasises that the preparation of a LDP affords the opportunity to engage with relevant government departments and agencies with responsibility for various aspects of flood risk management thereby fostering a necessary joined up approach to addressing flooding issues.

The SPPS directs that LDPs must take account of the potential risks from flooding over the plan period and beyond as this is likely to influence decisions on such matters as the zoning of land for development or the designation of land for open space use. It also identifies that flood risk may also be a consideration in the definition of settlement limits and in decisions concerning the designation of new settlements. In addition, the SPPS highlights that LDPs should also promote sustainable drainage within the plan area.

The SPPS directs that LDPs must take account of the most up to date information on flood risk, in particular that which is available on the Strategic Flood Map and that there should also be consultation with DfI Rivers from an early stage. The SPPS directs that LDPs should apply a precautionary approach to development in areas that may be subject to flood risk presently

or in the future as a result of climate change predictions and as such LDPs should not bring forward sites or zone land that may be susceptible to flooding, now or in the future, unless in exceptional circumstances.

The SPPS (para 3.13) also states that the planning system should help to mitigate and adapt to climate change by shaping new and existing developments in ways that reduce greenhouse gas emissions and positively build community resilience to problems such as extreme heat or flood risk. In addition, the SPPS states that the planning system should therefore help to mitigate and adapt to climate change by:

- avoiding development in areas with increased vulnerability to the effects of climate change, particularly areas at significant risk from flooding, landslip and coastal erosion and highly exposed sites at significant risk from impact of storms; and
- working with natural environmental processes, for example through promoting the development of green infrastructure and the use of sustainable drainage systems (SuDs) to reduce flood risk and improve water quality.

### **UK Marine Policy Statement**

The UK Marine Policy Statement (MPS) was published in September 2011 under the Marine Coastal Access Act 2009 and provides the policy framework for the marine planning system and taking decisions affecting the marine environment. The MPS provides the high-level policy context within which marine plans will be developed and 3 monitored and will ensure consistency in marine planning across the UK marine area. The MPS will contribute to the achievement of sustainable development in the United Kingdom marine area. Although the Borough does not directly connect to a coastline, waterways will have connectivity to marine areas, therefore the draft Plan Strategy has had regard to the MPS.

### **Draft Marine Plan for Northern Ireland**

The draft Marine Plan for Northern Ireland has been prepared under the Marine and Coastal Access Act 2009 (MCAA) and the Marine Act (Northern Ireland) 2013 (The Marine Act) and within the framework of the UK Marine Policy Statement. Published in April 2018, it provides a framework of policies to be considered by public authorities taking decisions that affect or might affect the marine area. The Northern Ireland marine area is made up of an inshore and an offshore region. The marine area comprises all marine waters including seabed, subsoil, sea loughs and tidal rivers, so far as the tide flows at Mean High Water Spring Tide. Although the Borough does not directly connect to a coastline, waterways will have connectivity to marine areas, therefore the draft Marine Plan for NI has been taken into consideration in the preparation of the draft Plan Strategy.

### **Planning Policy Statements:**

#### **Planning Policy Statement 15 (PPS 15) (Revised) Planning and Flood Risk**

Sets out the Department's draft planning policies to minimise and manage flood risk to people, property and the environment. It embodies the government's commitment to sustainable development and the conservation of biodiversity. It adopts a precautionary approach to development and the use of land that takes account of climate change and emerging information relating to flood risk through the implementation of the EU Floods Directive in Northern Ireland and the implementation of sustainable drainage systems.

PPS 15 is focused on the role of the land use planning system in the management of flood risk. The primary aim of the revised PPS 15 remains: “to prevent future development that may be at risk from flooding or that may increase the risk of flooding elsewhere”

### **Planning Policy Statement 7 (Addendum): Safeguarding the Character of Established Residential Areas**

Contains policy to promote greater use of permeable paving within new residential developments to reduce the risk of flooding from surface water run-off (Policy LC 3 Permeable Paving in New Residential Developments).

### **Supplementary Planning Guidance / Technical Advice:**

#### **Technical Flood Risk Guidance in relation to Allowances for Climate Change in Northern Ireland (2019) (DfI Water & Drainage Policy Division)**

The Department for Infrastructure (DfI)(Water & Drainage Policy Division), issued Technical Flood Risk Guidance: Allowances for Climate Change in Northern Ireland in February 2019.

The guidance set out the DfI Rivers updated approach to Climate Change in Flood Risk Management. A key change involves the approach to hydrological and hydraulic modelling/design which now requires the allowance for Climate Change to be made separately to any additional allowance for freeboard.

#### **Technical Advice Note 25 Revised: The Practical Application of Strategic Planning Policy for ‘Development in Proximity to Reservoirs’ (2020) (DfI)**

The Department for Infrastructure (DfI) issued a Technical Advice Note to Councils in August 2018 in relation to Reservoir flood risk entitled ‘The Practical Application of Strategic Planning Policy for Development in Proximity to Reservoirs.’ TGN 25 Revised supersedes the Technical Advice Note, dated August 2018.

The purpose of the Technical Guidance Note (TGN) is to explain the general approach DfI Rivers will follow when providing advice to Planning Authorities on all relevant applications for development within the potential flood inundation areas of controlled reservoirs as shown on Flood Maps (NI).

#### **DfI Rivers Guidance on the preparation of LDP policies for flood risk management (2018) (DfI Rivers)**

The purpose of the guidance is to assist Councils with the drafting of sound operational planning policies to be included within the Local Development Plan.

The guidance provides background information and definitions and also highlights the key considerations that should be taken into account to ensure that robust local operational planning policies are formulated and the reasons why these policy considerations are important.

The guidance includes a table detailing the ‘Recommended Approach to Local Flood Risk Policy Formulation’ in respect of key policy issues.

## **Other Strategies, Plans and Documents**

### **Everyone's Involved - Sustainable Development Strategy 2010 (Northern Ireland Executive)**

The Sustainable Development Strategy for Northern Ireland (2010) promotes sustainable communities and the protection of environmental resources, recognising the need to adapt to climate change and manage environmental risks. In this regard, the Strategy supports development that takes account of flood risk and avoids creating or exacerbating vulnerabilities to flooding, thereby contributing to the long-term sustainability and resilience of communities.

### **Sustainable Water - A long Term Water Strategy for Northern Ireland 2015 – 2040 (DRD 2016)**

'Sustainable Water – A Long-Term Water Strategy for Northern Ireland (2015- 2040)' sets out a range of initiatives to deliver the Executive's long-term goal of a sustainable water sector in Northern Ireland.

This strategy acknowledges that water is essential to life but can cause widespread damage if not managed appropriately. As the responsibility for the water sector is spread across a number of Government Departments, the strategy seeks to deliver a more joined up approach, setting out a range of initiatives to deliver the Executives long term goal of a sustainable water sector in Northern Ireland. The strategy intends to achieve this by encouraging a sustainable and integrated approach to managing all our different water needs in a way that promotes regional development, without compromising the environment or increasing flood risk.

Part 3 of the document entitled 'Flood Risk Management and Drainage' makes a number of recommendations to be considered when LDPs are being produced, with the overall vision of managing flood risk and drainage in a sustainable manner. The key aims identified in this section are:

- Deliver Sustainable Flood Resilient Development;
- Manage the Catchment to Reduce Flood Risk;
- Provide Sustainable Integrated Drainage in Rural and Urban Areas;
- Improve Flood Resistance and Resilience in High Flood Risk Areas; and
- Be Prepared for Extreme Weather Events.

FRMD Policy 1A, seeks to ensure land-use planning decisions are informed to help minimise flood risk. FRMD Policy 1B 'Make space for surface water management in development plans' highlights the opportunities for councils to introduce mitigating measures such as Key Site Requirements (KSRs) on zoned lands to address surface water flooding. FRMD Policy 1C states 'Sustainable Drainage Systems (SuDS) are the preferred option for managing surface water in new developments'.

### **NI Climate Change Adaption Plan 2019-2024 (Second Edition) (DAERA, 2019)**

The NI Climate Change Adaption Plan (NICCAP2) focuses on key priority areas identified as requiring urgent adaptation action over 5 years. The Vision of the NICCAP2 is to achieve 'A

resilient NI which will take timely and well-informed decisions to address the socio-economic and environmental impacts of climate change.

One example of the actions that the government will take forward, that will contribute to both the delivery of Outcome Objective IF1 (*'we have transport and network services that are resilient to the impacts of flooding and extreme weather'*) and the management of the relevant NI Evidence Report climate change risks and opportunities includes DfI engagement with local councils. The Adaptation Plan identifies that this engagement would assist local councils in bringing forward Local Development Plan policies and proposals that take account of climate change adaptation considerations in accordance with the provisions of the SPPS and any other policies or advice in guidance issued by the DfI.

As part of the preparation of NICCAP2 an engagement and information gathering exercise was undertaken to map the adaptation activities that local government is already taking. The Adaptation Plan acknowledged that local councils already recognise many of the risks posed to their organisations and services, and are taking vital action, highlighting that many local council strategies and activities are increasing climate change resilience across built and natural environments, and local communities. The preparation of the Local Development Plans was one of the examples identified by the NICCAP2 which will help shape future development and growth as well as provide a local planning policy framework for decision-taking. The NICCAP2 highlights that in bringing forward local planning policies, councils must take account of the SPPS for Northern Ireland which identifies climate change considerations.

### **Managing Storm water – A Strategy for Promoting the Use of Sustainable Drainage Systems (SuDs) within Northern Ireland (NIEA 2011)**

'Managing Storm water - A Strategy for Promoting the Use of Sustainable Drainage Systems' acknowledges that the development and use of land carries with it the potential to impact upon the aquatic environment. It can adversely impact upon drainage and consequently may worsen flooding, in addition to being at direct risk of flooding if inappropriately located. As such, the strategy identifies that issues relating to drainage and flooding are material to planning decisions and a consideration for Planning Service in the execution of its responsibilities under the Planning (Northern Ireland) Order 1991. Furthermore, the strategy identifies that the concept of Sustainable Drainage Systems (SuDS) should be promoted through future regional planning policy and via local development plans.

### **Second Cycle Northern Ireland Flood Risk Management Plan 2021-2027 (DfI 2021))**

The Second Cycle Northern Ireland Flood Risk Management Plan (FRMP) 2021 - 2027 is a requirement under The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009.

The Plan focuses on the 12 Areas of Potential Significant Flood Risk (APSFR), with specific measures tailored to manage flood risk in particular locations.

The Plan also sets out a series of Regional Measures which apply across all of Northern Ireland, supporting the sustainable management of flood risk for both APSFR and the wider River Basin Districts.

The Second Cycle Northern Ireland Flood Risk Management Plan, insofar as it relates to Armagh City, Banbridge and Craigavon Borough, is considered further in Section 4 'Borough Profile- Flood Risk and Drainage'.

### **DfI Strategic Framework (April 2023)**

The Department for Infrastructure is responsible for the maintenance and development of critical infrastructure in Northern Ireland. Through its focus on water, transport and planning public services, the Department is seeking to manage and protect £32 bn of public assets. The DfI Strategic Framework outlines the main aspects of the Department's work and the challenges it faces in delivering its essential public services.

With regards to flooding and drainage, the Strategic Framework notes that the Department is responsible for the management of flood risk including river and sea defence maintenance, the construction of flood alleviation schemes and the provision of flood maps and other flood risk information to inform emergency response and community resilience activities. Approximately 45,000 or 5% of all properties in Northern Ireland are in areas at risk from flooding, which increases by 33% to 59,800 when 2080 climate change projections are taken into consideration. The Department is accelerating investment in flood risk management infrastructure, whilst also developing new flood alleviation schemes.

As well as managing approximately 426 km of raised flood defence embankments and flood walls, 26km of coastal defences, and 12 control structures, the Department maintains an extensive below ground drainage network of over 364km of culverts. In addition, it is responsible for managing and maintaining 136 hydrometric stations used to measure and record water levels. To maintain or upgrade this infrastructure to acceptable standards will require an additional investment compared to previous years of £13million per year, to avoid increased numbers of failing assets and increased flood risk to life and property.

### **Local Policy Context**

The key pieces of local policy relating to this subject area include the following:

#### **Existing Area Plans**

The existing 4 statutory Area Plans covering the Borough provide the policy framework against which development proposals are considered.

- The Armagh Area Plan (AAP) 2004
- The Armagh Area Plan Alteration No 1: Countryside Proposals
- The Banbridge, Newry and Mourne Area Plan (BNMAP) 2015
- The Craigavon Area Plan (CAP) 2010
- The Dungannon and South Tyrone Area Plan (DSTAP) 2010

Due to the varying ages of the extant Development Plans, there are inconsistencies in approach with regards to a number of planning issues as well as the degree of emphasis in respect of the principles of sustainable development. However, the existing Plans are an important consideration in the LDP process, and as such have been taken into account in the development of the draft Plan Strategy. Policies within the respective Development Plans that are related to flood risk and drainage are laid out below.

## **Armagh Area Plan 2004**

The Armagh Area Plan 2004 provides a planning framework for the growth and development of the Armagh area. The AAP identifies that the main areas at risk from flooding include:

- Armagh City along the Callan River corridor; and
- Keady Town along the Clay River corridor (in particular north-east of Keady Business Centre, Annvale Road).

In relation to amenity open space zonings, the AAP 2004 states that there is a history of flooding associated with the River Callan which flows through the western part of Armagh. While the plan proposes no significant development within its narrow floodplain, the river valley does have potential for amenity open space purposes subject to drainage considerations.

## **Craigavon Area Plan 2010**

The CAP identifies that there are certain areas where flood risk is a particular concern:

- Portadown along the River Bann Corridor (the CAP 2010 has a designated flood pondage area and associated plan policy - Plan Policy UTIL 1 Development within the Portadown Flood Pondage Area).

It is important to note that the area shown as the CAP 2010 flood pondage area is only that area south of the River Bann Northway Road bridge. This does not correspond to the extent of the 2008 DARD Q1:100 climate change strategic flood map which also includes a large swathe of land north of the railway line as far as Lough Neagh.

The CAP advocates the use of SuDS to promote sustainable drainage.

## **Banbridge, Newry and Mourne Area Plan 2015**

The BNMAP identifies a number of recorded flooded areas that significantly affect particular settlements within the Plan Area. The main areas at risk from flooding include:

- the Bann River Valley at Banbridge, Gilford and Lawrencetown; and
- the Lagan River Valley at Dromore.

It is indicated that the Area Plan does not state every floodplain and users are directed to the DARD strategic flood maps available at: [www.riversagency.cyni.gov.uk](http://www.riversagency.cyni.gov.uk).

The BNMAP also states that there is a risk of flooding on part of the following sites and as such Flood Risk Assessments will be required for development proposals at these locations:

- Zoning BE 42 – Bridge Street, Banbridge Development Opportunity Site;
- Zoning DE 19 – Mount Street, Dromore Housing;
- Zoning DE 34 – Rear of 28-36 Market Square, Dromore Development Opportunity Site;
- Zoning DE 35 - Bridge Street / Meeting Street, Dromore Development Opportunity Site;
- Zoning DE 36 – 17-21 Meeting Street and land to rear, Dromore Development Opportunity Site; and
- Zoning GD 10 - Gilford Riverside Development Opportunity Site.

In keeping with the RDS, the BNMAP advocates the use of Sustainable Urban Drainage Systems (SuDS) to promote sustainable drainage.

## **Dungannon and South Tyrone Area Plan 2010**

The DSTAP identifies that the main areas subject to flood risk lie along the Blackwater and Torrent River corridors. The main risk areas on the Blackwater are located at Augher, Caledon, Clogher and Moy, and on the Torrent River at Castlecaulfield, Donaghmore and Newmills. In addition to these rivers, flood risk is also present at Ballygawley from the Ballygawley River.

The DSTAP acknowledges that flood risk will need to be taken into account in any development proposals and may restrict the development potential of land in its vicinity. Furthermore, the DSTAP recognises that many existing urban drainage systems are damaging the environment and therefore supports a move towards more Sustainable Urban Drainage Systems (SuDS).

### **Other Council Documents and Strategies**

#### ***Our People, Our Place, Our Future'- The Councils Corporate Plan 2023 – 2027***

The Corporate Plan 2023-27 sets out the vision, values and priorities of the Council and represents its aspirations and dedication to continuous improvement. It is the roadmap for delivering Council's Community Plan 2017 – 2030 and sets out the Councils commitment to uphold the highest standards of service delivery, facilities, projects, and programmes for the benefit of our people, our place and our future.

The Vision of the Corporate Plan is to create *"a happy, healthy and connected community, a vibrant and sustainable economy and appealing places for living, working and learning"* aligning with the aspirations of the Community Plan.

The priority of the Corporate Plan is to improve economic, social and environmental well-being through place shaping in order to attract visitors, investors, and to encourage people to be active, with a focus on promoting health and wellbeing. The Council aims to improve participation in arts and culture and strengthen the Borough as a visitor destination as well as supporting the growth of our local economy, by securing investment in infrastructure and connectivity, and providing opportunities in skills development.

The Corporate Plan proposes five priorities, each with three commitments outlining what the Council are going to do alongside actions aimed at achieving the commitments.

#### **Connected a Community Plan for Armagh City, Banbridge & Craigavon Borough 2017-2030**

Councils across Northern Ireland have a statutory responsibility to participate and lead in Community Planning. The Local Government (Northern Ireland) Act 2014 and the Planning Act (Northern Ireland) 2011 create a statutory link between the Community Plan and the LDP. It outlines that the LDP will provide 'the spatial expression of the Community Plan.'

The Council's Community Plan is an overarching strategy for the Armagh City, Banbridge and Craigavon Borough. 'Connected' was launched on 4<sup>th</sup> May 2017 and updated in 2025. It provides a strategic framework for collaborative working, helping to integrate other local and regional strategies and the delivery of positive change for communities. The Community Plan will be taken into account throughout the preparation of the LDP, which will provide the spatial reflection of the Community Plan.

The Community Plan 2030 Vision is 'We have a happy, healthy and connected community, a vibrant and sustainable economy and appealing places for living, working and learning.'

The Community Plan aims to achieve the vision through three strategic themes of *Community*, *Economy* and *Place* and nine shared outcomes, as follows:

1. *Community*: Connected | Healthy | Welcoming
2. *Economy*: Enterprising | Inclusive | Skilled
3. *Place*: Creative | Revitalised | Sustainable

The three cross-cutting themes at the centre of the Community Plan are: *Connectivity*, *Equality* and *Sustainability*. These form the foundation of and underpin the Plan. The Community Plan identifies strong strategic alignment, including with the Programme for Government.

Due to the close relationship between the two plans, the LDP Vision will be based on the Community Plan Vision; citizen focused and aspiring to improve the quality of life for everyone. However, within the LDP, emphasis will be placed on land use and the creation of quality places.

Although the Community Plan does not specifically mention flooding, the principles of flood risk management are in keeping with the long-term outcomes of an 'Enhanced' and 'Revitalised' Place. Having an effective and informed policy approach to flood risk management will ensure that our built and natural assets and our distinct and vibrant urban and rural areas are protected.

### **Craigavon Integrated Development Framework (CIDF) 2010**

The aim of the CIDF is to guide how the 3 town centres of Central Craigavon, Portadown and Lurgan will develop and thrive over the next 20 years and sets out a strategy for regeneration. Flood risk and drainage is not considered within the CIDF. However, project P13 'Flood Mitigation Measures Introduced' is identified as a high priority, across a medium timeframe, in the CIDF Action Plan.

### **Armagh Place Plan 2022**

The Armagh Place Plan 2022 highlights the need for better flood management. It states the West of Armagh is more prone to flooding compared with the rest of the city, as a result of multiple rivers and low topography. The Plan advocates for natural solutions where possible, more green space, and avoiding dense development near or within flood risk zones.

### **Banbridge Place Plan**

The Armagh, Banbridge and Craigavon Community Planning Partnership launched the Banbridge Place Plan on 20 March 2024.

The Plan is designed around 5 outcomes; Bridging Banbridge, Green Banbridge, Healthy Banbridge, Creative Banbridge, and Growing Banbridge. The plan identifies 56 actions to bring about positive change in Banbridge. These actions include physical and non-physical interventions, and they have been thematically clustered;

- Arts, Heritage and Leisure
- Green Innovation
- Spaces, Places and Natural Environment
- Living Here

- High Street and Investing

### **Dromore Place Plan**

The Armagh, Banbridge and Craigavon Community Planning Partnership launched the Dromore Place Plan on 7 May 2025.

It outlines a strategic vision for Dromore and sets out five outcomes which are aimed at enhancing the quality of life for the residents, preserving the unique character of the area whilst stimulating economic growth.

The plan details four big ideas, and six thematic clusters comprising of thirty-seven suggested actions, serving as a road map for the community planning partners, stakeholders, businesses and local community groups, designed to help with the shaping, transformation and development of Dromore into the future.

## 4.0 Borough Profile – Flood Risk and Drainage

### Northern Ireland Flood Risk Assessment (NIFRA) (2018 DfI) (Revised May 2019)

The Northern Ireland Flood Risk Assessment (NIFRA) 2018 is a high-level flood risk analysis of the potential impacts on human health, the environment, cultural heritage and economic activity which could occur as a result of potential flooding in Northern Ireland. 'The Northern Ireland Flood Risk Assessment (NIFRA) 2018' identified 45 flood risk areas across Northern Ireland.

| Rank | Area Name               | AAAD (£ Millions) | Rank | Area Name     | AAAD (£ Millions) |
|------|-------------------------|-------------------|------|---------------|-------------------|
| 1    | Belfast                 | 16.18             | 23   | Ballyclare    | 0.58              |
| 2    | Londonderry             | 5.56              | 24   | Coolkeeragh   | 0.54              |
| 3    | Newry                   | 4.07              | 25   | Downpatrick   | 0.53              |
| 4    | Lurgan                  | 2.31              | 26   | Coalisland    | 0.49              |
| 5    | Glengormley and Mallusk | 2.09              | 27   | Limavady      | 0.46              |
| 6    | Larne                   | 2.03              | 28   | Coleraine     | 0.46              |
| 7    | Bangor                  | 1.84              | 29   | Warrenpoint   | 0.40              |
| 8    | Portadown and Craigavon | 1.81              | 30   | Cookstown     | 0.40              |
| 9    | Omagh                   | 1.70              | 31   | Eglinton      | 0.35              |
| 10   | Newtownabbey            | 1.44              | 32   | Maghera       | 0.32              |
| 11   | Carrickfergus           | 1.17              | 33   | Ahoghill      | 0.30              |
| 12   | Ballymena               | 1.07              | 34   | Enniskillen   | 0.29              |
| 13   | Whitehouse              | 0.93              | 35   | Castlederg    | 0.28              |
| 14   | Strabane                | 0.91              | 36   | Rostrevor     | 0.26              |
| 15   | Dundonald               | 0.88              | 37   | Lisbellaw     | 0.25              |
| 16   | Lisburn                 | 0.79              | 38   | Glenavy       | 0.23              |
| 17   | Newtownards             | 0.77              | 39   | Keady         | 0.21              |
| 18   | Holywood                | 0.75              | 40   | Ballycastle   | 0.21              |
| 19   | Armagh                  | 0.71              | 41   | Stoneyford    | 0.18              |
| 20   | Newcastle               | 0.66              | 42   | Dromore       | 0.18              |
| 21   | Banbridge               | 0.63              | 43   | New Buildings | 0.15              |
| 22   | Antrim                  | 0.62              | 44   | Artigarvan    | 0.15              |
|      |                         |                   | 45   | Magherafelt   | 0.12              |

**Table 1: Flood Risk Areas in Northern Ireland (Source: The Northern Ireland Flood Risk Assessment (NIFRA) 2018)**

Within Armagh City, Banbridge and Craigavon Borough, Lurgan, Portadown and Craigavon, Armagh, Banbridge, Keady, and Dromore are categorised as flood risk areas. As seen in **Table 1**, above, the 45 flood risk areas in Northern Ireland are ranked by an Annual Average Damages (AAAD) value, which is a theoretical average economic damage caused by flooding. Portadown and Craigavon are categorised as one area. Portadown and Craigavon, in addition to Lurgan, are placed within the top 10 ranking of AAAD.



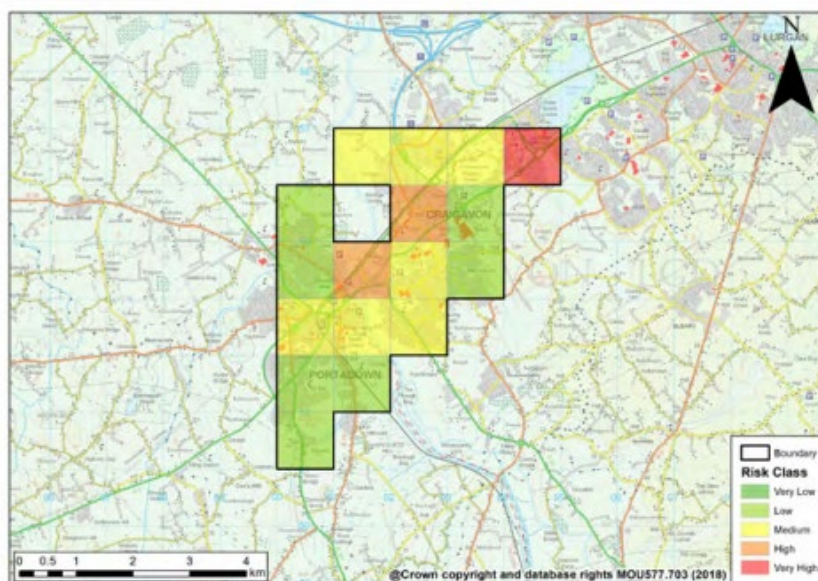
**Map 1: Areas of Potential Significant Flood Risk (APSFR) and Transitional Areas of Potential Significant Flood Risk (TAPSFR) in Northern Ireland (Source: The Northern Ireland Flood Risk Assessment (NIFRA) 2018)**

Of the 45 identified flood risk areas in Northern Ireland, 12 have been identified as Areas of Potential Significant Flood Risk (APSFR) and a further 9 identified as Transitional Areas of Potential Significant Flood Risk (TAPSFR).

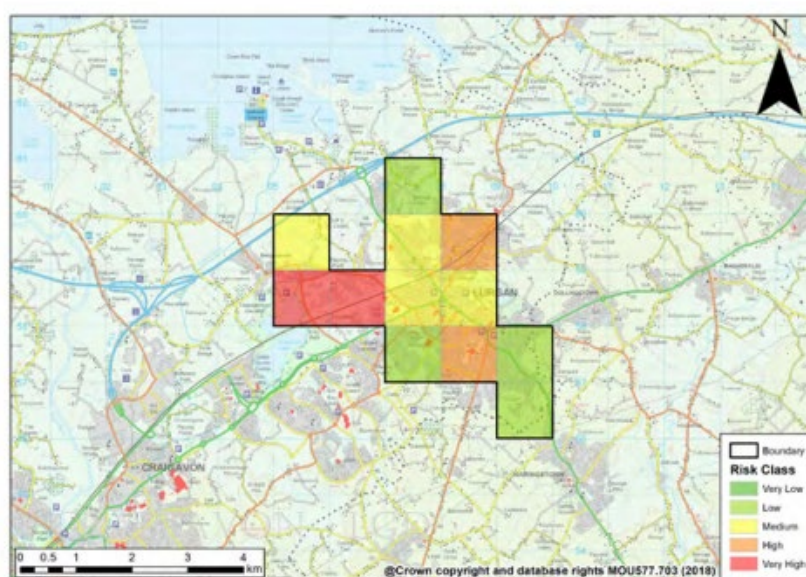
In determining this flood risk, the effect of existing flood defences and culverts has been taken into account and pluvial flooding has been included in the identification of APSFRs. As identified in **Map 1**, above, Banbridge has been identified as a TAPSFR, with risk stemming from both fluvial and pluvial sources, and Lurgan, Portadown and Craigavon have been identified as APSFRs.

The Northern Ireland Flood Risk Assessment (NIFRA) 2018) identifies that Lurgan, Portadown and Craigavon, (both APSFR), which are situated in the Neagh Bann River Basin District, are at risk of flooding from both fluvial and pluvial sources which could adversely impact on people and property in the area. See **Maps 2 and 3**, below, depicting flood risk in Portadown/ Craigavon and Lurgan respectively.

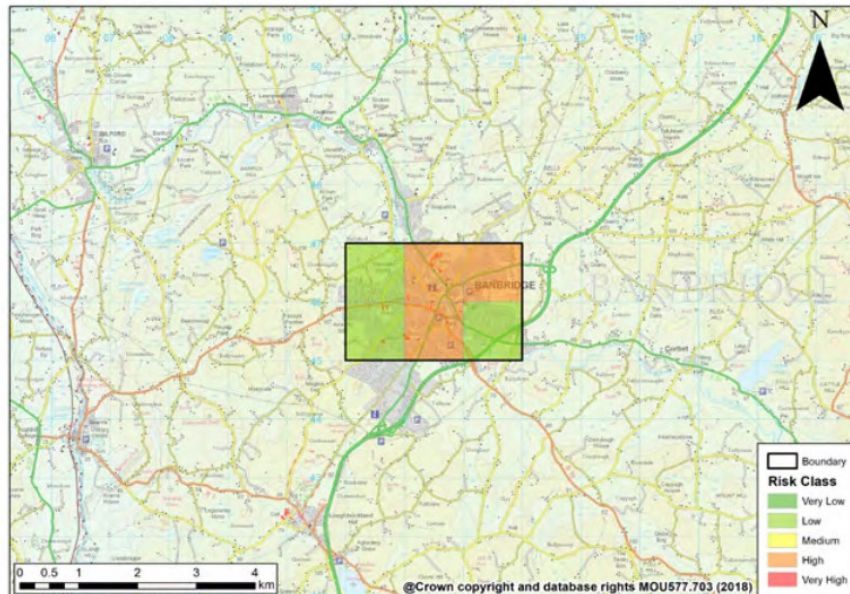
The Northern Ireland Flood Risk Assessment (NIFRA) 2018) identifies that Banbridge TAPSFR, which is situated in the Neagh Bann River Basin District, is at risk from flooding from fluvial and pluvial sources. See **Map 4** below.



**Map 2: Flood Risk in Portadown and Craigavon (Source: The Northern Ireland Flood Risk Assessment (NIFRA) 2018)**



**Map 3: Flood Risk in Lurgan (Source: The Northern Ireland Flood Risk Assessment (NIFRA) 2018)**



**Map 4: Flood Risk in Banbridge (Source: The Northern Ireland Flood Risk Assessment (NIFRA) 2018)**

## **Second Cycle Northern Ireland Flood Risk Management Plan 2021-2027 (DfI, December 2021)**

The Second Cycle Northern Ireland Flood Risk Management Plan (FRMP)<sup>2</sup> focuses on the APSFRs within Northern Ireland, including Lurgan, Portadown and Craigavon, with specific measures tailored to manage flood risk in particular locations.

The Plan also sets out a series of Regional Measures which apply across all Northern Ireland, supporting the sustainable management of flood risk for both APSFR and the wider River Basin Districts.

### *Lurgan APSFR*

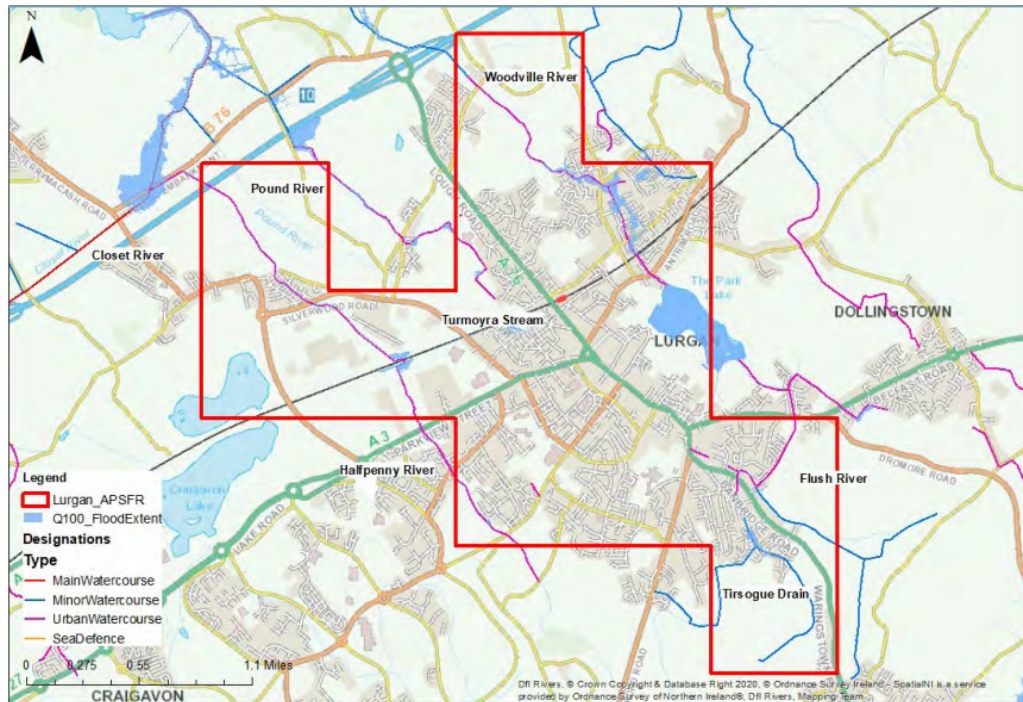
The FRMP identifies that flooding in Lurgan APSFR is primarily caused by small watercourses in the area exceeding channel capacity and a number of culverts which are unable to convey flood flows, which is exacerbated by drainage issues and surface water flooding. The FRMP acknowledges Lurgan's history of recorded flooding, detailing an 'exceptional flood event' in 1901, known as the 'Great Floods', and more recent episodes of flooding in 2008, 2011, 2014 and 2018, when dwellings, commercial properties and local infrastructure were inundated.

The urban drainage and wastewater network within the Lurgan APSFR is comprised of approximately 105 km of storm sewers and 130 km of foul sewers, with a total length of combined sewer network of approximately 20 km. The Lurgan area is served by a WwTW at Ballynacor and there are also five NI Water wastewater pumping stations in the APSFR.

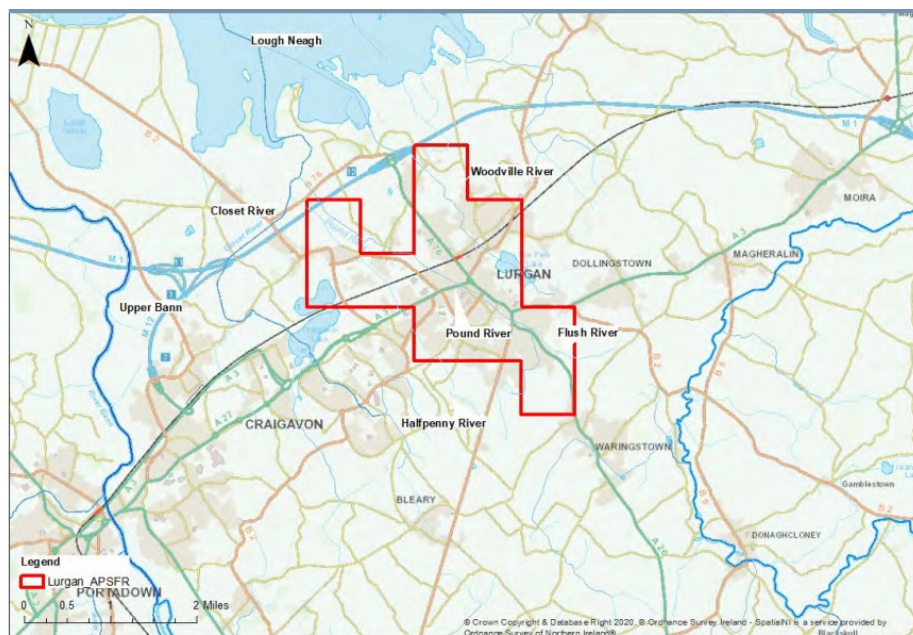
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<sup>2</sup> Second Cycle Northern Ireland Flood Risk Management Plan 2021-2027 (DfI 2021)- a requirement under The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009.

In terms of flood risk mitigation and planning, the FRMP highlights that in addition to national planning policy and advice, DfI Rivers will advise against bringing forward sites or the zoning of any land in preparation for the new Armagh City, Banbridge and Craigavon Borough Council Local Development Plan, particularly for built development, that has been identified from the flood maps as being within the 1 % AEP (1 in 100 year) fluvial floodplain (plus the latest climate change mapped prediction), a reservoir inundation area, or is susceptible to surface water flooding.



**Map 5: Fluvial Hazard Map for a 1% (1 in 100 year) flood event- Lurgan APSFR (source: Second Cycle Northern Ireland Flood Risk Management Plan 2021-2027 (DfI 2021))**



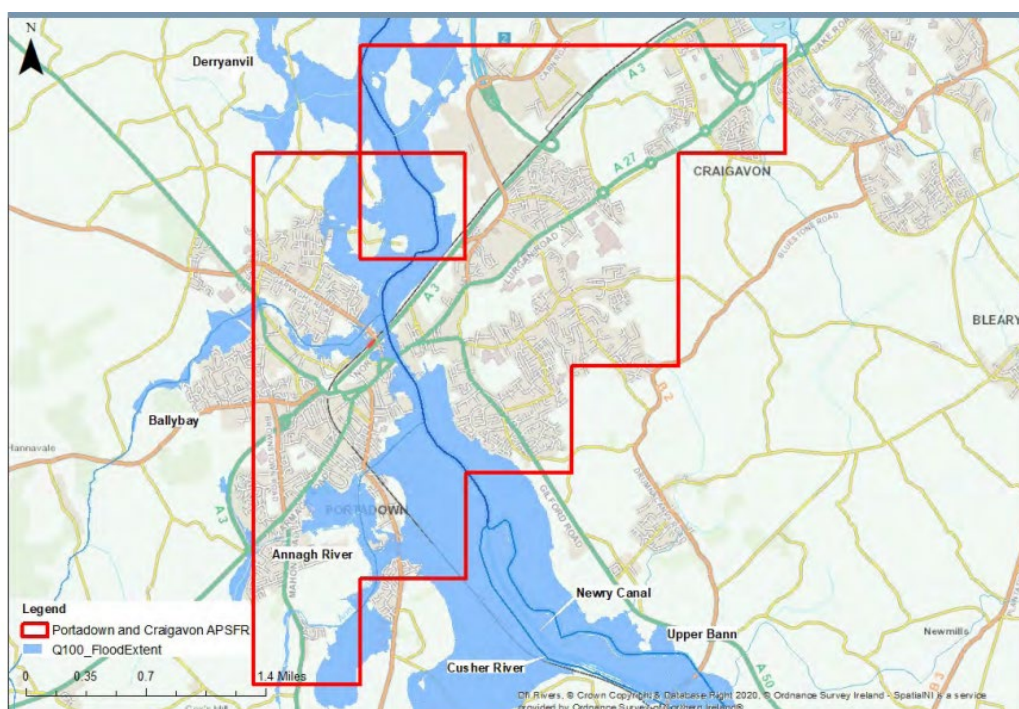
**Map 6: Location and boundary of Lurgan APSFR and key watercourses (source: Second Cycle Northern Ireland Flood Risk Management Plan 2021-2027 (DfI 2021))**

*Portadown and Craigavon APSFR*

The FRMP identifies that Portadown and Craigavon are at risk from both fluvial and surface water sources, with the most recent severe flooding as a result of four consecutive storms in the winter of 2015/2016 which affected both residential and commercial properties, as well as local infrastructure. The FRMP acknowledges that there are no formal flood defences in the Portadown and Craigavon APSFR, although there are some agricultural defences outside the APSFR boundary both upstream and downstream of Portadown on the River Bann.

The urban drainage and wastewater network within the Portadown and Craigavon APSFR is comprised of approximately 115 km of storm sewers and 125 km of foul sewers, with a total length of combined sewer network of approximately 65 km. The Portadown and Craigavon area is served by Ballynacor WwTW approximately 1.5 km from Lough Neagh and there are also 11 NI Water wastewater pumping stations in the APSFR.

In terms of flood risk mitigation and planning, the FRMP highlights that in addition to national planning policy and advice, DfI Rivers will advise against bringing forward sites or the zoning of any land in preparation for the new Armagh City, Banbridge and Craigavon Borough Council Local Development Plan, particularly for built development, that has been identified from the flood maps as being within the 1 % AEP (1 in 100 year) fluvial floodplain (plus the latest climate change mapped prediction), a reservoir inundation area, or is susceptible to surface water flooding.



**Map 7: Fluvial Hazard Map for a 1% (1 in 100 year) flood event- Portadown and Craigavon APSFR (source: Second Cycle Northern Ireland Flood Risk Management Plan 2021-2027 (DfI 2021))**

## **Armagh City, Banbridge and Craigavon Borough Flood Alleviation Scheme**

Before flood alleviation schemes are designed and constructed, they must first undergo a feasibility stage. A feasibility study is done to identify possible options to alleviate flooding problems. Such studies include assessments of costs and benefits of the proposed options to determine if a scheme is viable and which option is best.

DfI Rivers has carried out post flood investigations and feasibility reports in relation to a number of flooding incidents over recent years and produced the following reports in respect of Armagh City, Banbridge and Craigavon Borough:

### **Lurgan Feasibility Study (June 2018, DfI Rivers)**

DfI Rivers commissioned RPS Consulting Engineers to identify the flood risk associated with the complex watercourse system in and around Lurgan and to appraise flood risk and investigate options (including economic viability) which will alleviate flood risk in Lurgan. The Study identified a variety of short-term options, such as temporary defences and individual property protection, in addition to long term options, including hard defences and sealing manholes.

### **Portadown Feasibility Study (July 2018, DfI Rivers)**

DfI Rivers commissioned RPS consulting to assess whether an economical, environmentally and socially sensitive scheme can be produced which will reduce the impact of potential flooding to properties, infrastructure and businesses from the River Bann and some of its Tributaries<sup>3</sup>.

The study report, which was produced in 2018, identified that 308 properties in the Portadown area were at risk of fluvial flooding in the event of a 1% annual exceedance probability (AEP) flood (a flood that has a 1% chance of occurring or being exceeded in any given year). The feasibility study identified that the main risk of fluvial flooding comes from the River Bann and the Corcrain River, a tributary of the River Bann.

The feasibility study's recommendation to reduce the impact of any potential flooding in the event of a 1% AEP flood included the construction of 6.5km of defences and a flap valve, which would take place at 17 sites across Portadown and the surrounding area.

In 2019 DfI Rivers commissioned Amey, engineering consultants, to undertake the design of the Portadown FAS and progress the scheme to the works procurement stage. However, following publication of 'Technical Flood Risk Guidance in Relation to Allowances for Climate Change in Northern Ireland' (DfI, 2019), Amey carried out a review of the scheme to ensure climate change was appropriately considered.

As a result of the review, which indicated that there are 474 residential properties and 100 commercial properties at risk of fluvial flooding in the event of the design flood, the design flood levels were increased, in addition to the length, height, number of defences. The scheme proposed to construct 9.4km of flood defences at 20 sites in the Portadown area.

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<sup>3</sup> Source of information: DfI: [Portadown Flood Alleviation Scheme | Department for Infrastructure \(infrastructure-ni.gov.uk\)](#)

In January 2022 DfI gave notice, in pursuance of Article 12B of the Drainage (Northern Ireland) Order 1973 (as amended), that it proposes to carry out a flood alleviation scheme in Portadown, Co. Armagh.

Having taken account of the characteristics of the works in the proposed scheme, their locations and potential impacts, DfI determined that the proposed scheme is likely to have significant environmental effects and intends to prepare an Environmental Statement.

In December 2025, the DfI Minister provided an update on the Portadown Flood Alleviation Scheme, announcing that proposals were 'being developed to reduce the risk of river flooding to over 380 homes and businesses at 21 different sites across the Portadown Area. It is being designed with an allowance for climate change and includes the construction of approximately eight kilometres of flood defences.

The construction of the scheme is due to commence in Autumn/ Winter 2026, with an anticipated project duration of approximately six years. The works will be delivered in three phases, each spanning around two years.

Details of the Portadown Flood Alleviation Scheme can be viewed at: **DfI: [Portadown Flood Alleviation Scheme | Department for Infrastructure \(infrastructure-ni.gov.uk\)](https://infrastructure-ni.gov.uk)**

### **Flood Management Schemes in Armagh City, Banbridge and Craigavon Borough**

DfI Rivers undertakes a range of flood alleviation and drainage related works each year. The following scheme was completed in Armagh City, Banbridge and Craigavon Borough:

- Laurelvale (County Armagh) Flood Alleviation Scheme - New floodwalls, embankment and piped culverts- completed 2018/ 2019

### **Existing Flood Protection Defences in Armagh City, Banbridge and Craigavon Borough**

**Appendix 1** details the existing Flood Protection Defences within Armagh City, Banbridge and Craigavon Borough.

The following areas within the Borough benefit from flood protection defences within the defended flood plain (see individual maps for more specific locations):

- Annagh River, Mahon Road, Portadown- Engineered Defence
- Bann River, Church Square and Downshire Road, Banbridge- Engineered Defence
- Callan River, Loughgall- Engineered Defence
- Cor River, Tynan- Significant Agricultural Defence
- Cushier River, Sinton's factory site at Glebe Hill Manor, Tandragee- Engineered Defence
- Drumadonnell River, Moneyslane, Banbridge- Significant Agricultural Defence
- River Bann, Aughnacloy Road, Banbridge- Engineered Defence
- River Bann, Balleevy Mill, Castletwellan Road, Banbridge- Engineered Defence
- River Bann, Stramore Road, Gilford- Engineered Defence
- River Bann, Katesbridge, Banbridge- Engineered Defence
- River Bann, Gilford Road, Portadown- Significant Agricultural Defence
- River Lagan, Moygannon Road, Donaghcloney- Engineered Defence
- River Lagan, Lagan Street, Lurgan Road, Dromore- Engineered Defence

In addition, South Lake, Central Craigavon was designed to act as a balancing lake, releasing rainwater collected from the surrounding built up areas of Craigavon at a controlled rate into

streams which flow into Lough Neagh, to prevent a storm surge of water. Central Craigavon and the Southern Lake is linked to Lough Neagh via the Closet River.

## **Watercourse Maintenance in Armagh City, Banbridge and Craigavon Borough**

### *DfI Rivers Annual Watercourse Maintenance Programme 2026/27*

DfI Rivers carries out routine maintenance work on designated main, minor and urban watercourses which also includes minor works of repair/refurbishment to ancillary structures and installations. The main purpose of the works is to ensure water flows freely in designated watercourses, so to alleviate flooding and assist with land drainage.

Details of designated watercourses that are to be maintained by DfI Rivers during the 2026-27 financial period, including specific information on the watercourses and associated proposed works is available through the DfI GIS viewer (link below) – which provides the name of the watercourse, and the type of proposed maintenance work involved.

Link: [Watercourse Maintenance Programme 2026-27 \(arcgis.com\)](https://arcgis.com)

## **Reservoirs**

The Reservoirs Act (Northern Ireland) 2015, as detailed in Section 2.0 of this document, provides for the regulation of controlled reservoirs, ensuring that they are managed and operated so to minimise the risk of flooding to protect people, the environment, cultural heritage and economic activity.

A Controlled Reservoir is defined in The Reservoirs Act (Northern Ireland) 2015 as a structure or area, capable of holding 10,000 cubic metres or more of water above the natural level of the surrounding land. As such it can constitute a potential source of flood risk in the event of an uncontrolled release of water.

Where development is proposed within the inundation area of a Controlled Reservoir, PPS 15 FLD 5 and SPPS use a two-step approach, with the first step requiring the applicant to provide assurance that the reservoir is in good condition, well maintained and safely managed in compliance with industry standards. If condition assurance cannot be obtained for a given reservoir by the applicant, in the interests of public safety it is not safe to permit development in the inundation area of said reservoir. If condition assurance is obtained the developer will be required to submit a detailed flood risk assessment to show how the identified flood risk to the development, and elsewhere as a result of it, can be managed and migrated.

Due to the particular flood risks associated with reservoirs, coupled with the substantial onus that will be placed upon developers, the LDP should carefully consider whether it is appropriate to allocate land for development within reservoirs inundation areas.

There are currently 12 'Controlled Reservoirs' in Armagh City, Banbridge and Craigavon Borough, as detailed in **Table 2** below.

| <b>Controlled Reservoirs</b> | <b>Location</b>      |
|------------------------------|----------------------|
| Clay Lake                    | Keady, County Armagh |

|                        |                                |
|------------------------|--------------------------------|
|                        |                                |
| Corbet Lough           | Banbridge, County Down         |
| Darkley Lake           | Darkley, County Armagh         |
| Lough Shark            | Loughbrickland, County Down    |
| Lowry's Lough          | The Waste Lands, County Armagh |
| Seagahan Dam           | Tassagh, County Armagh         |
| Shaw's Lake            | Glenanne, County Armagh        |
| Tullynawood Lake       | Darkley, County Armagh         |
| Craigavon Lakes        | Craigavon, County Armagh       |
| Magheralin Pond        | Magheralin, County Down        |
| The Park Lake (Lurgan) | Lurgan, County Armagh          |
| Barronstown Road Pond  | Dromore, County Down           |

**Table 2: Controlled Reservoirs in Armagh City, Banbridge and Craigavon Borough**

Please note that the potential flood inundation area of Begny Lake, Spelga, Lough Island Reavy, Stoneyford and Broadwater Reservoir may have potential to inundate areas within Armagh City, Banbridge and Craigavon Borough Council.

The number of Controlled Reservoirs in Northern Ireland is ever changing. As the map viewer is only updated periodically, the list below reflects the information available to the Department at this time. This information may however be subject to change as further controlled impounding or service reservoirs are notified to the Department, inundation maps are prepared and those responsible for the safety of reservoir structures consider and act on any advice that may be provided to them by the reservoir engineers that they commission.

DfI publishes a map viewer which provides the location of controlled reservoirs that have been notified to the Department, along with an indicative outline of the area that may potentially be inundated in the unlikely event of reservoir failure. When new development in the flood inundation area of reservoirs is being considered by Planning Authorities, the Department provides, where possible, advice to planning authorities based on the principle of the avoidance of any additional risk to public safety.

The DfI Reservoir Flood Map viewer is available through the following link:

<https://www.infrastructure-ni.gov.uk/articles/what-reservoirs-bill-northern-ireland>

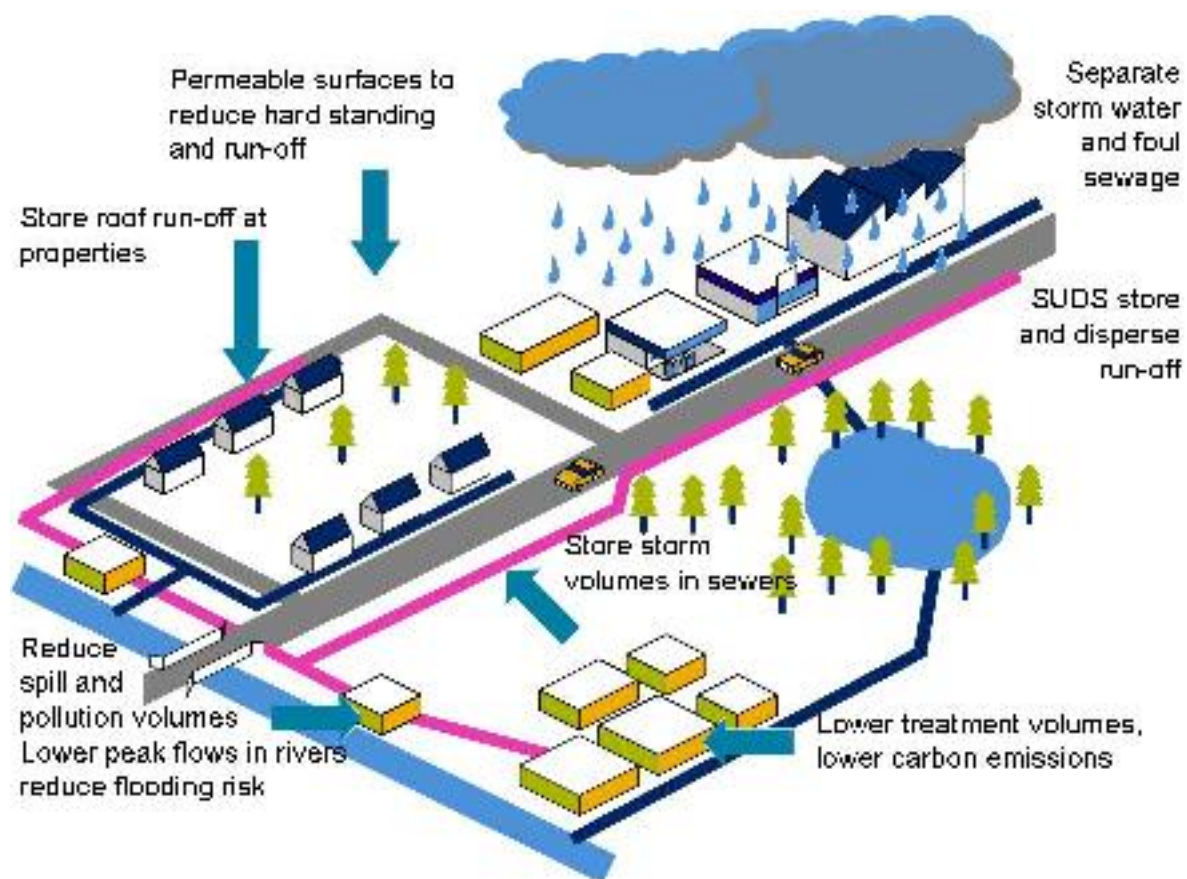
## Surface Water Drainage

With numerous urban areas within our Borough at risk of surface water flooding, it is envisaged that the LDP has an important role to play in promoting a SuDS in new development.

The SPPS states that in managing development, particularly in areas susceptible to surface water flooding, planning authorities should encourage developers to use SuDS as the preferred drainage solution. Such systems are widely used in other UK jurisdictions and have been shown to be more effective than traditional piped drainage in reducing surface water flooding as well as providing other environmental, economic and social benefits. Furthermore, using permeable materials for hard landscaped surfaces in new developments can reduce soil sealing.

**Figure 2: Example of a Sustainable Drainage System (SuDS)**

Source: <https://www.ofwat.gov.uk/future/sustainable/drainage/current>



## **5.0 Preferred Options Paper**

The Council published its Preferred Options Paper (POP) in March 2018. The main purpose of the POP was to promote focused debate on key issues of strategic significance likely to influence the direction of future development within the Borough, so to inform the next stage in the LDP process, the Plan Strategy.

The POP outlined the vision and strategic objectives of the Plan, along with 38 Key Issues and the possible options available to address them, including the Council's Preferred Option. The Key Issues emerged from our evidence base; from engagement with Elected Members and Section 75 Groups; and from formal and informal consultation with Statutory Consultation Bodies. To inform the POP, a preliminary review of operational planning policy was also carried out, with a commitment to complete a more detailed policy review in advance of the Plan Strategy.

The POP did not cover every issue, policy and proposal that will be included in the LDP. Instead, the POP focused upon the main planning issues that had been identified through the work undertaken in developing the evidence base for the LDP, including consultation with statutory consultees and council officials, workshops with Elected Members and through the Community Plan process.

A total of 201 responses, from members of the public and statutory consultees, were received during the 9-week public consultation period, these included a wide range of comments in relation to the POP, supporting documents and the POP consultation process

### **Key Issues**

Key Issue ENV 7 in the Preferred Options Paper (POP) was 'Developing within areas of flood risk (flood plains)'.

Key Issue ENV 8 in the POP was 'Encouraging Sustainable Drainage Systems (SuDS)'.

### **Preferred Options**

The preferred approach to Key Issue ENV 7 was to adopt a precautionary approach in line with existing policy and regional direction by having a presumption against development in flood plains other than in exceptional circumstances.

The preferred approach to Key Issue ENV 8 was to bring forward policy to encourage the use of Sustainable Drainage Systems (SuDS) in new development where appropriate. The preferred approach recommended that Sustainable Drainage Systems (SuDS) are promoted as the preferred method of managing surface water drainage within new urban development. The preferred approach would update and go further than the current policy provisions in that it would encourage the integration of SuDS schemes irrespective of any history or potential of pluvial flooding and greater onus would be placed on the developer to demonstrate why SuDS would not be suitable.

### **Summary of POP Commitments**

POP Commitments in respect of flood risk and SuDs included:

- Bring forward an approach in line with the existing Policy FLD 1 (New Development in Fluvial (River) and Coastal Flood Plains) in PPS 15 and the SPPS.

- Continue to adopt the presumption against development in flood risk areas, known as the precautionary principle, unless it constitutes one of the listed exceptions such as the replacement of existing buildings and the use of land for sport or outdoor recreation.
- Ensure that proposals which constitute one of the listed exceptions are subject to a satisfactory Flood Risk Assessment (FRA) to ensure that new development does not cause or exacerbate flooding elsewhere, now and into the future.
- Promote SuDs schemes as the preferred method of managing surface water drainage within new urban development.
- Encourage the integration of SuDs schemes in new development irrespective of any history of potential pluvial flooding.
- Greater onus on the developer to demonstrate (for certain types of development) to demonstrate why SuDs would not be suitable, even where it is demonstrated that surface water flood risk can be effectively controlled and mitigated and will not create greater potential for surface water flooding elsewhere.
- Engagement with relevant bodies to further explore how SuDs can be encouraged in policy and ensure the maintenance and management of such schemes.

## **POP Representations**

### *ENV 7 'Developing within areas of flood risk (flood plains)'*

Of the total 201 responses received in respect of the POP, 33 made reference to Key Issue ENV 7. There was significant support for the preferred approach, with 85% of the responses categorised as being generally supportive, 9% of the responses categorised as unsupportive and the remaining 6% considered to be non-committal or unclear.

A number of the comments that were received were in agreement with a precautionary approach towards development within identified flood plains by having a presumption against building in floodplains. One of the comments highlighted that flood management should be about protecting and enhancing the natural environment alongside protecting people and property from the damaging impacts of floods. It was also highlighted that there was a lack of detail in respect of other flood risk scenarios, such as development in proximity to reservoirs, protection of flood defence and drainage infrastructure and the artificial modification of watercourses.

One of the respondents acknowledged that a precautionary approach is essential in ensuring that safe and appropriate development is facilitated, however considered that the listed exceptions to development are too restrictive. Instead, it was suggested that the precautionary approach should be extended to a simple policy allowing development within potential floodplains subject to a robust Flood Risk Assessment (with appropriate mitigation if necessary), demonstrating that there is no increased risk of flooding to the development or neighbouring lands.

Another respondent considered that many types of development are low-risk and are compatible with flood risk areas. Therefore, instead of a ban of all development in flood plains which does not meet the requirements of "exceptional circumstances" the respondent suggested a more flexible and scientific approach should be applied, whereby flood zones have been divided into different risk categories, allowing for certain types of development.

### *ENV 8 'Encouraging Sustainable Drainage Systems (SuDS)'*

Of the total 201 responses received in respect of the POP, 29 made reference to Key Issue ENV 8. There was significant support for the preferred approach, with 83% of the responses

categorised as being generally supportive, 14% considered to be non-committal or unclear and only 3% categorised as being unsupportive.

One of the respondents considered that the approach of “encouraging” the use of sustainable drainage systems (SuDS) in new development is in keeping with SPPS whilst another highlighted that there is an opportunity to design in biodiversity benefits in SuDs systems. One of the respondents considered that amending the existing policy from ‘favourable consideration’ to the ‘encouragement of SuDS’, may not go far enough, as the ‘where appropriate’ caveat at the end of the preferred option also provides further wriggle room in its interpretation. It was also recommended that SuDS should be promoted within new developments, along with retrofits to existing developments, when assessments prove the need. Interestingly, another respondent suggested that the Council, particularly where the policy goes further than existing provisions, should be mindful of potential impact on the viability of development schemes.

One of the respondents highlighted that the impact of SuDS on any archaeological sites, known or unknown, should be carefully considered, including the presence of heritage assets, in relation to mitigation measures. It was also suggested that the implications for a firmer policy approach should be explored in terms of responsibility for maintenance and management of SuDS and the Council should liaise with DfI Rivers when drafting policy in relation to management of surface water to ensure it is compliant with the SPPS.

### **Consideration of Preferred Options**

Having considered the representations received during consultation, including those from statutory consultees, the Council has sought to bring forward an approach that is broadly consistent with the POP preferred option. However, where the draft policy approach is not fully in accordance with the POP, this reflects the need to take account of all relevant and up to date regional policy direction, the most recent evidence base, consultee engagement and the requirement to ensure that the draft Plan Strategy is robust, effective and sound.

For further detail on the POP responses, and the Council's consideration, refer to the POP Public Consultation Report, available on the Council's website:

[www.armaghbanbridgecraigavon.gov.uk](http://www.armaghbanbridgecraigavon.gov.uk)

## **6.0 Stakeholder Engagement**

### **Internal Stakeholders**

#### **Planning Officers in Development Management Section**

Consultation was carried out with planning officers in the Planning Department's Development Management Section out as part of the policy review process; to establish any difficulties they experienced in the application of existing planning policies and to provide an opportunity to critique the draft policies. Officers' views were taken into consideration in finalising draft policies prior to being presented at Council Members workshops.

#### **Other Council Departments**

Representatives from relevant Council departments have been engaged to ensure that due account has been taken of Council's Community Plan, as well as other Council strategies and initiatives.

This engagement was undertaken by way of individual meetings with council departments, in particular the Community Plan Team to ensure account was taken of the Council's Community Plan.

A meeting also took place with a 'Project Management Team.' The Project Management Team was comprised of Officers from a range of council departments, including Community Plan, Tourism, Economic Development, Environmental Health and Environmental Services.

#### **Elected Members**

Section 8 (7a) of Part 2 (Local Development Plans) of the Planning Act (Northern Ireland) 2011 requires the Plan Strategy to be adopted by resolution of the Council. As such, Elected Members have been engaged throughout the LDP process, including the preparation of the draft dPS policies.

Engagement with the Elected Members has been facilitated through a series of workshops held between 2019 and 2026. That engagement included the draft Flood Risk and Drainage Policies set out below:

- Policy FRD 1 – Development in Fluvial (River) Flood Plains
- Policy FRD 2 – Protection of Flood Defence and Drainage Infrastructure
- Policy FRD 3 – Development and Surface Water (Pluvial) Flood Risk Outside Flood Plains
- Policy FRD 4 – Artificial Modification of Watercourses
- Policy FRD 5 – Development in proximity to Reservoirs

Whilst there was general agreement with the draft policy wording, Elected Members highlighted the following:

- The difficulty around assessing the impact of reservoirs not in public ownership and their possible maintenance / condition.

## External Stakeholders

### Government Departments and Agencies

Section 8 (5) of Part 2 (Local Development Plans) of the Planning Act (Northern Ireland) 2011 requires the Plan Strategy to take account of the RDS, any policy and guidance issued by the Department and other relevant government strategies and plans. As such the Council has engaged key consultees representing relevant central government departments and agencies in the preparation of the draft Plan Strategy policies, including DfI Rivers.

### Cross Boundary Context and Consideration of Neighbouring Council Approaches

In developing draft-planning policies for flood risk and drainage consideration has also been given to the approaches of adjoining Councils.

The Borough adjoins the boundary of five neighbouring Council areas, 4 of which are in Northern Ireland and one of which is in the Republic of Ireland:

- Antrim and Newtownabbey Borough Council (by Lough Neagh);
- Newry Mourne and Down District Council;
- Mid Ulster District Council;
- Lisburn and Castlereagh City Council; and
- Monaghan County Council, in the Republic of Ireland.

The Preferred Options Papers (POPs), supporting evidence base and draft Plan Strategies (where published) of adjoining Councils have been taken account of, in addition to regional guidance, to identify any cross-boundary issues / conflicts.

**Table 3**, below, outlines the position of adjoining councils regarding flood risk and drainage.

| Adjoining Council                       | Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Antrim and Newtownabbey Borough Council | <p>Antrim and Newtownabbey Borough Council (ANBC) adopted its Plan Strategy in July 2025.</p> <p>Policies DM 46 'The Control of Development in Flood Plains' and DM 47 'Surface Water Drainage and Sustainable Drainage Systems (SuDS)' set out ANBCs approach to flood risk and drainage. The aim of the policies is to reduce flood risk and minimise the impact of all forms of flooding in the Council Area by applying a strong presumption against development proposals within flood plains. ANBC also promote the use of SuDS, as the preferred means of treating surface water and managing flow rates for development proposals in locations where this is a feasible solution.</p> <p>Policy DM 48 'Reservoir Flood Risk' sets out ANBCs approach to reservoir flood risk, which aims to minimise potential flood risk for developments in close proximity to controlled reservoirs.</p> |

|                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                         | <p>The approach is consistent with the SPPS.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Lisburn & Castlereagh City Council      | <p>Lisburn &amp; Castlereagh City Council adopted its Local Development Plan 2032, Plan Strategy in September 2023.</p> <p>Policies FLD 1 Development in Fluvial (River) Flood Plains; FLD2 Protection of Flood Defence and Drainage Infrastructure; FLD3 Development and Surface Water (Pluvial) Flood Risk Outside Flood Plains; FLD4 Artificial Modification of Watercourses; and FLD5 Development in Proximity to Reservoirs set out the Council's position in relation to flood risk and drainage.</p> <p>The aims of the policies include reducing flood risk in the council area by applying a strong presumption against development proposals within flood plains and imposing controls on any new development proposed within the potential flood inundation area of a controlled reservoir.</p> <p>The approach is consistent with the SPPS.</p>                                                                                                                                                                                                                                  |
| Newry, Mourne and Down District Council | <p>Newry, Mourne and Down District Council (NMDDC) published its draft Plan Strategy in June 2025.</p> <p>Draft policies FLD 1 Development in Flood Plains; FLD2 Protection of Flood Defence and Drainage Infrastructure; FLD3 Development and Surface Water (Pluvial) Flood Risk Outside Flood Plains; FLD4 Artificial Modification of Watercourses; FLD5 Development in Proximity to Reservoirs and FLD 6 Sustainable Drainage Systems set out the Council's position in relation to flood risk and drainage.</p> <p>The aims of the policies include reducing flood risk in the council area by applying a strong presumption against development proposals within flood plains and imposing controls on any new development proposed within the potential flood inundation area of a controlled reservoir.</p> <p>The Council also promotes the use of SuDS as the preferred means of managing surface water run off for all development that requires the submission of a Drainage Assessment (DA) where feasible.</p> <p>The approach would appear to be consistent with the SPPS.</p> |

|                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mid Ulster District Council | <p>The draft Plan Strategy was submitted to the Department for Infrastructure in May 2021.</p> <p>MUDCs approach to flood risk and drainage is set out in draft Policies FLD 1- FLD 5: FLD 1 'Fluvial Floodplains', FLD 2 'Development and Surface Water (Pluvial) Flood Risk Outside Flood Plains', FLD 3 'Protection of Flood Defence and Drainage Infrastructure', FLD 4 'Development in Proximity to Reservoirs' and FLD 5 'Artificial Modification of Watercourses'. MUDCs approach seeks to reduce flood risk and the adverse consequences of flooding, by promoting a more sustainable approach to flood risk management. The draft PS adopts a precautionary approach to flood risk regarding developments in areas susceptible to flooding and development will only be facilitated in areas of surface water flooding when it is demonstrated through a Drainage Assessment that the risk can be effectively controlled and mitigated and will not create the potential for surface water flooding elsewhere. The draft PS also states that development within the flood inundation area of a controlled reservoir will be avoided unless it has been demonstrated that appropriate controls and safeguards are in place. Furthermore, as a general principle, MUDC is to encourage developers to use SuDS in areas susceptible to surface water flooding.</p> |
| Monaghan County Council     | <p>Monaghan County Council adopted its County Development Plan 2025 - 2031 on 26 May 2025. It contains a Strategic Flood Risk Assessment to identify areas most at risk. Chapter 8 includes a section on Flood Risk Management, which sets out five objectives. The overall aim is to avoid developments in areas known to be at the highest risk, while upgrading flood defences to adapt to climate change. The Plan will also require the use of SuDS in new developments.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

**Table 3 - Adjoining Councils' Position – Flood Risk and Drainage**

The Council has responded to neighbouring councils' Preferred Options Papers and Draft Plan Strategies, as they have been published.

Although there are some differences in the policy wording and various approaches neighbouring councils have adopted towards flood risk and drainage, it is not considered that there are any significant conflicts with the draft PS for Armagh City, Banbridge and Craigavon Borough Council.

## 7.0 Draft Plan Strategy Policy Approach

As analysed above, the Council's draft flood risk and drainage policies and relevant draft policy provisions within the suite of General Policies and Design and Placemaking Policies have evolved from a review of extant regional planning policies, other key policy and guidance documents, the POP, responses to the POP and a series of engagements with key stakeholders, including the following:

- DfI Rivers and other key statutory consultees.
- Elected Members of the Council.
- Officers from the Development Management section of the planning department; and
- Officers from other relevant departments of the Council.

In preparing the draft policies, the Council has taken account of a range of relevant matters, including the following:

- The RDS (in particular RG12) and SPPS (in particular paragraphs 6.99-6.132).
- Revised PPS 15 (Planning and Flood Risk) and Policy LC3 of the addendum to PPS7 along with extant development plans within Armagh City, Banbridge & Craigavon Borough.
- The Council's Community Plan (especially in terms of the Plan's commitment to deliver a sustainable place and to protect climate, biodiversity and natural assets - see page 26-27), ongoing council initiatives and the neighbouring council context.
- The adopted /draft Plan Strategies of neighbouring councils – the draft policies are not considered to conflict with any of those.

The draft policies have been subject to a Sustainability Appraisal (SA), the findings of which are set out in the accompanying SA Environmental Report.

In conclusion, the draft policies are founded on a robust evidence base which includes baseline information contained in this Technical Supplement, the POP, responses to the POP and subsequent engagement with consultees, including DfI Rivers.

## 8.0 Soundness

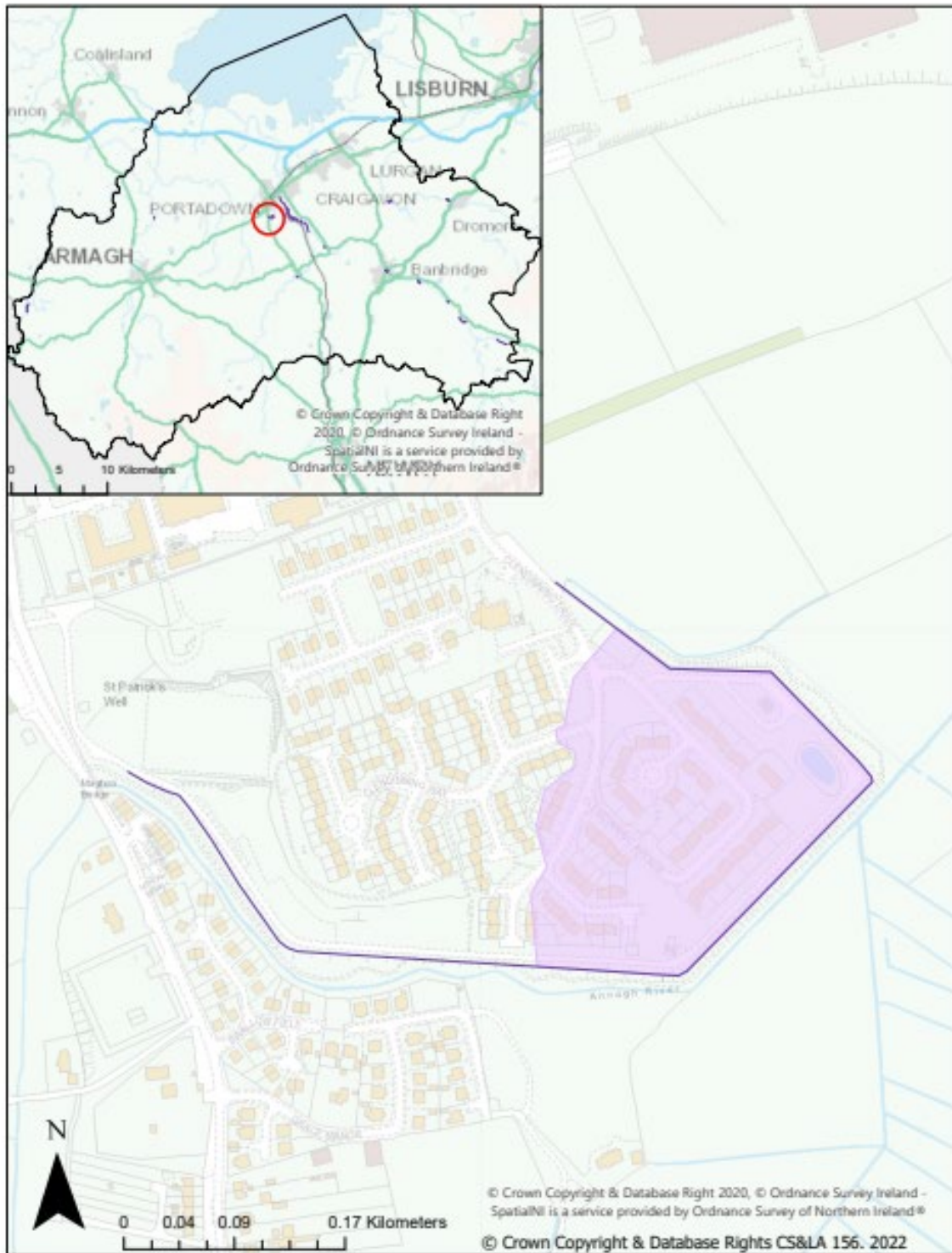
The LDP has been prepared in accordance with the tests of soundness set out in the DfI's Development Plan Practice Note 6: Soundness (Version 2, May 2017). The draft Plan Strategy, insofar as it relates to flood risk and drainage policies, is considered to be sound, as it satisfies the relevant tests of soundness, as summarised in **Table 4** below:

**Table 4: Consideration of Soundness**

| <b>Procedural Tests</b>                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>P2</b>                                | Policies GP1, GP2 and FRD 1 - 5 have evolved from the POP and have taken account of responses to the POP and the POP Consultation Report.                                                                                                                                                                                                                                                                                                            |
| <b>P3</b>                                | Policies GP 1, GP 2 and FRD 1 - 5 have been subject to Sustainability Appraisal, including a Strategic Environmental Assessment. Further details are included in the Sustainability Appraisal Report.                                                                                                                                                                                                                                                |
| <b>Consistency Tests</b>                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>C1</b>                                | Policies GP 1, GP 2 and FRD 1 - 5 have taken account of the RDS and in particular RG 12.                                                                                                                                                                                                                                                                                                                                                             |
| <b>C2</b>                                | Policies GP 1, GP 2 and FRD 1 - 5 have taken account of the Council's Community Plan, particularly in terms of the Plan's commitment to deliver a sustainable place and to protect climate, biodiversity and natural assets - see page 26 - 27.                                                                                                                                                                                                      |
| <b>C3</b>                                | GP 1, GP 2 and FRD 1 - 5 have taken account of existing planning policies as contained within the SPPS, in particular paragraphs 6.99 - 6.132, along with Revised PPS 15 (Planning and Flood Risk) and Policy LC3 of the addendum to PPS7.                                                                                                                                                                                                           |
| <b>C4</b>                                | Policies GP 1, GP 2 and FRD 1 - 5 have taken account of the existing development plans within Armagh City, Banbridge and Craigavon Borough, ongoing Council initiatives and the neighbouring council context, including the Republic of Ireland.                                                                                                                                                                                                     |
| <b>Coherence and Effectiveness Tests</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>CE1</b>                               | Policies GP 1, GP 2 and FRD 1 - 5 have taken account of the emerging LDPs of our neighbouring Councils in Northern Ireland and neighbouring council in the Republic of Ireland (Monaghan County Council) and are not considered to conflict with those.                                                                                                                                                                                              |
| <b>CE2</b>                               | Policies GP 1, GP 2 and FRD 1 - 5 are founded on a robust evidence base which includes the baseline information contained in this technical supplement, the POP and responses to it and subsequent consultation with consultees, including DfI.                                                                                                                                                                                                      |
| <b>CE3</b>                               | As part of the Council's ongoing monitoring framework, the number of approvals granted for development in a flood plain will be annually monitored and assessed against relevant indicators to determine whether the strategy and policies are being implemented effectively, remain appropriate and continue to support the Plan's objectives. Monitoring findings will inform the future review of the Plan and any necessary policy intervention. |
| <b>CE4</b>                               | Policies GP 1, GP 2 and FRD 1 - 5 will be reviewed at Plan Review stage. Where appropriate, the need for flexibility has been built into the strategic approach and draft policies to allow for changing circumstances. Local Policies Plan stage will provide further opportunity to review existing and introduce new local policies, provided this is underpinned by robust evidence base and is consistent with the adopted Plan Strategy.       |

# **Appendix 1**

## **Existing Flood Protection Defences within Armagh City, Banbridge and Craigavon Borough**



### Legend

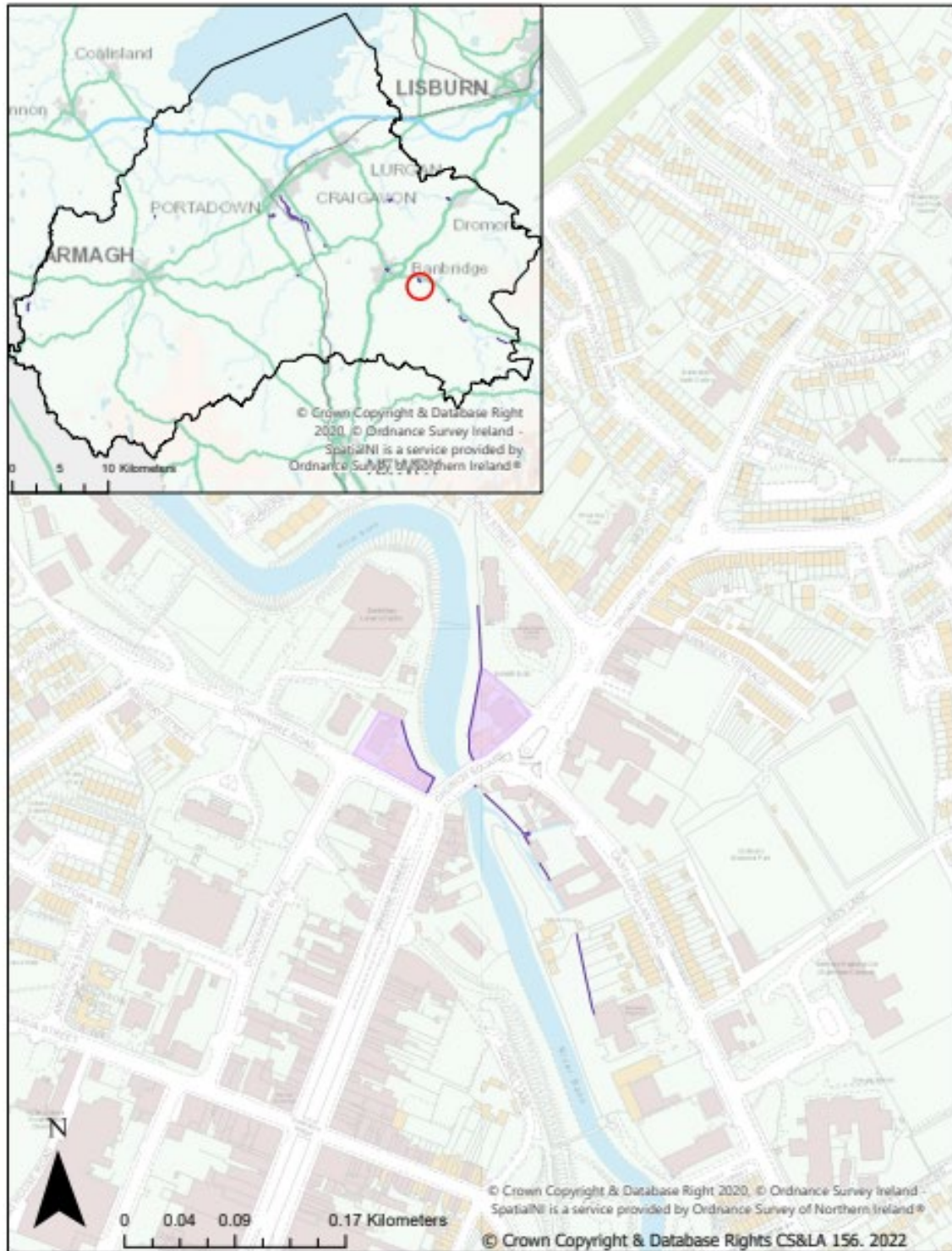
- Flood Defence Structure
- ABC Boundary
- Areas Benefiting from Defences

### Annagh River- Portadown

### Engineered Defence



**Armagh City  
Banbridge  
& Craigavon**  
Borough Council



### Legend

- Flood Defence Structure
- ABC Boundary
- Areas Benefiting from Defences

## River Bann- Banbridge (Church Square) Engineered Defence



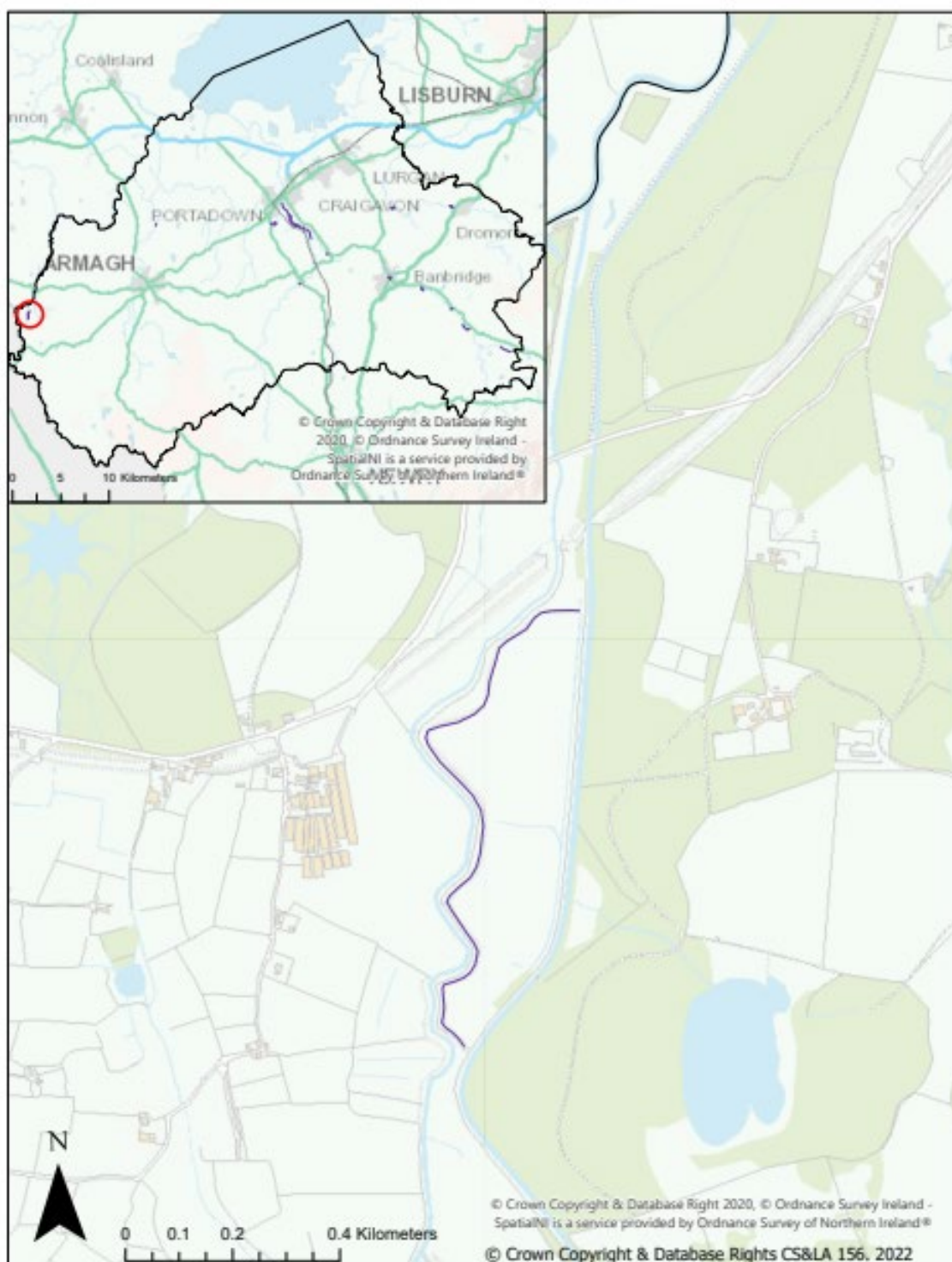


## Legend

- Flood Defence Structure
- ABC Boundary

## Callan River- Loughgall Engineered Defence



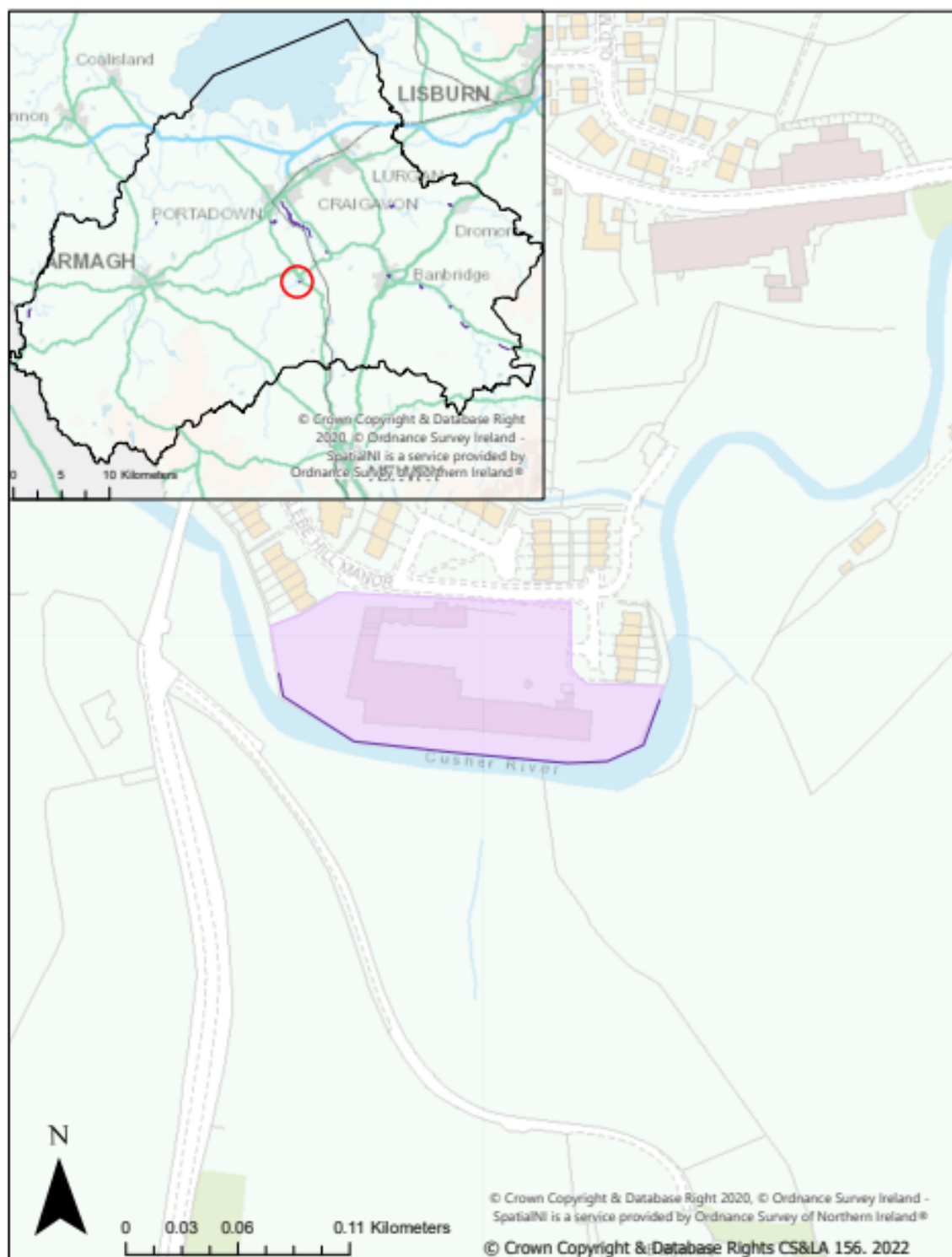


## Legend

- Flood Defence Structure
- ABC Boundary

## Cor River- Tynan Significant Agriculture Defence





### Legend

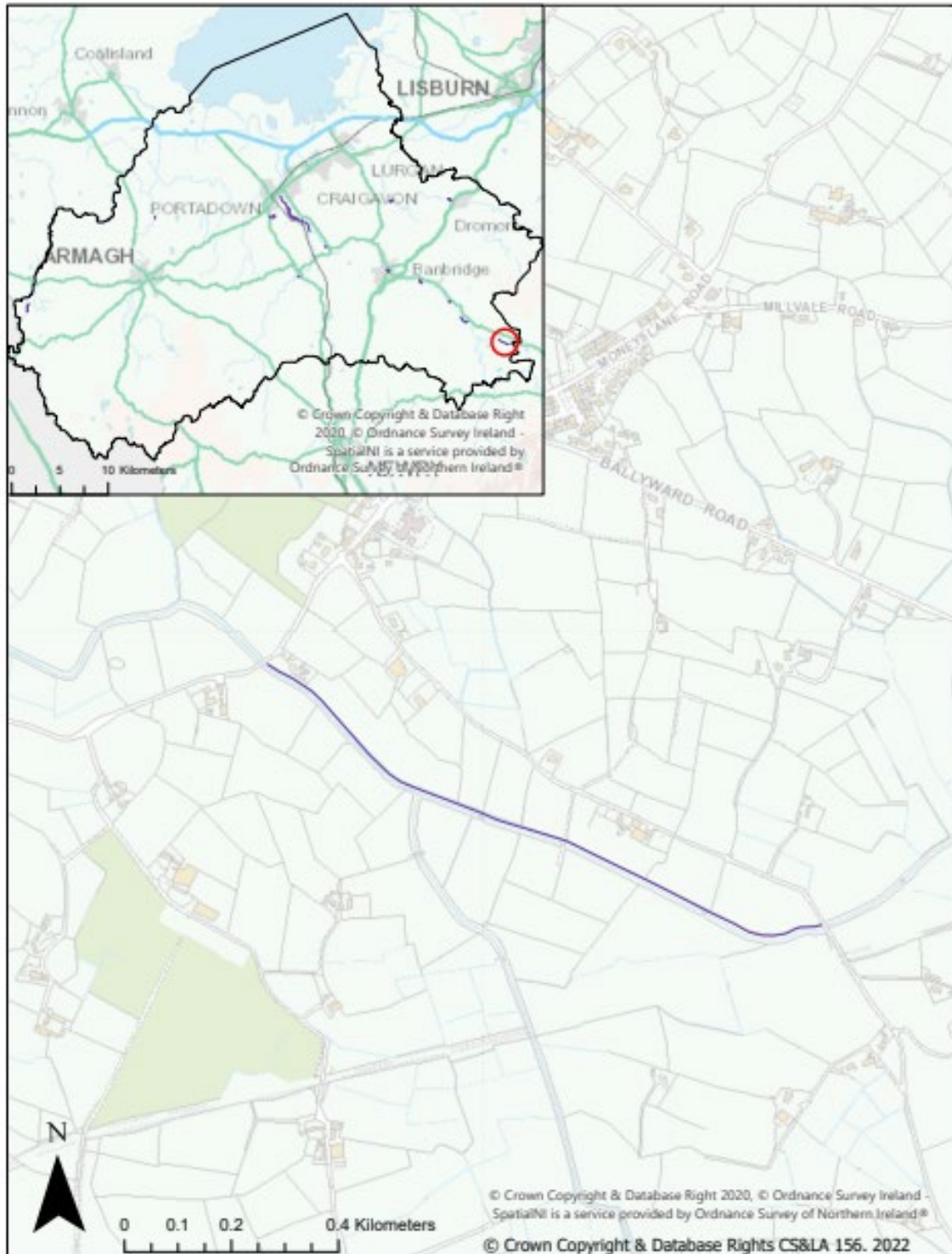
- Flood Defence Structure
- Areas Benefiting from Defences
- ABC Boundary

## Cusher River- Tandragee

### Engineered Defence



Armagh City  
Banbridge  
& Craigavon  
Borough Council

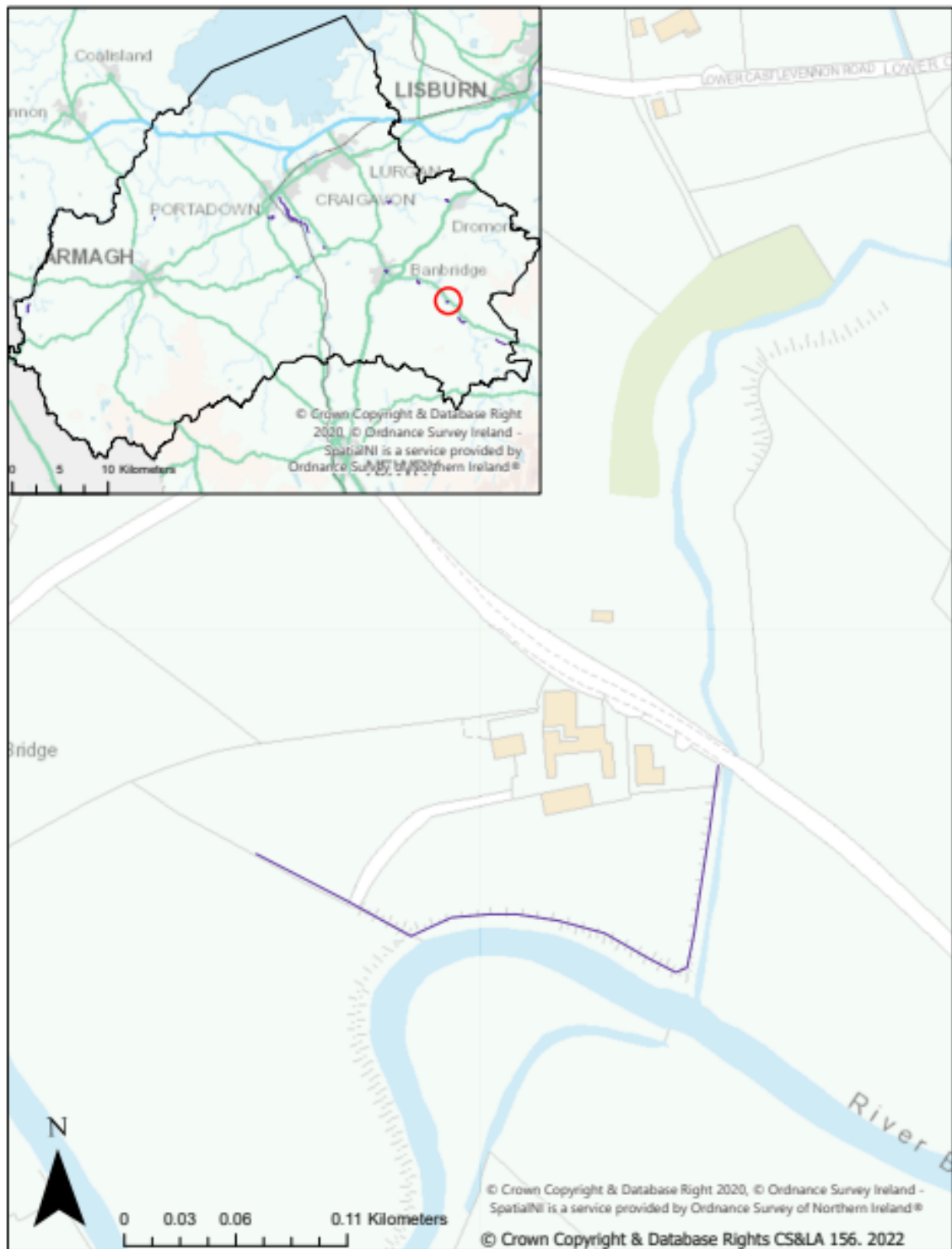


## Legend

- Flood Defence Structure
- ABC Boundary

## Drumadonnell River- Banbridge (Moneyslane) Significant Agriculture Defence



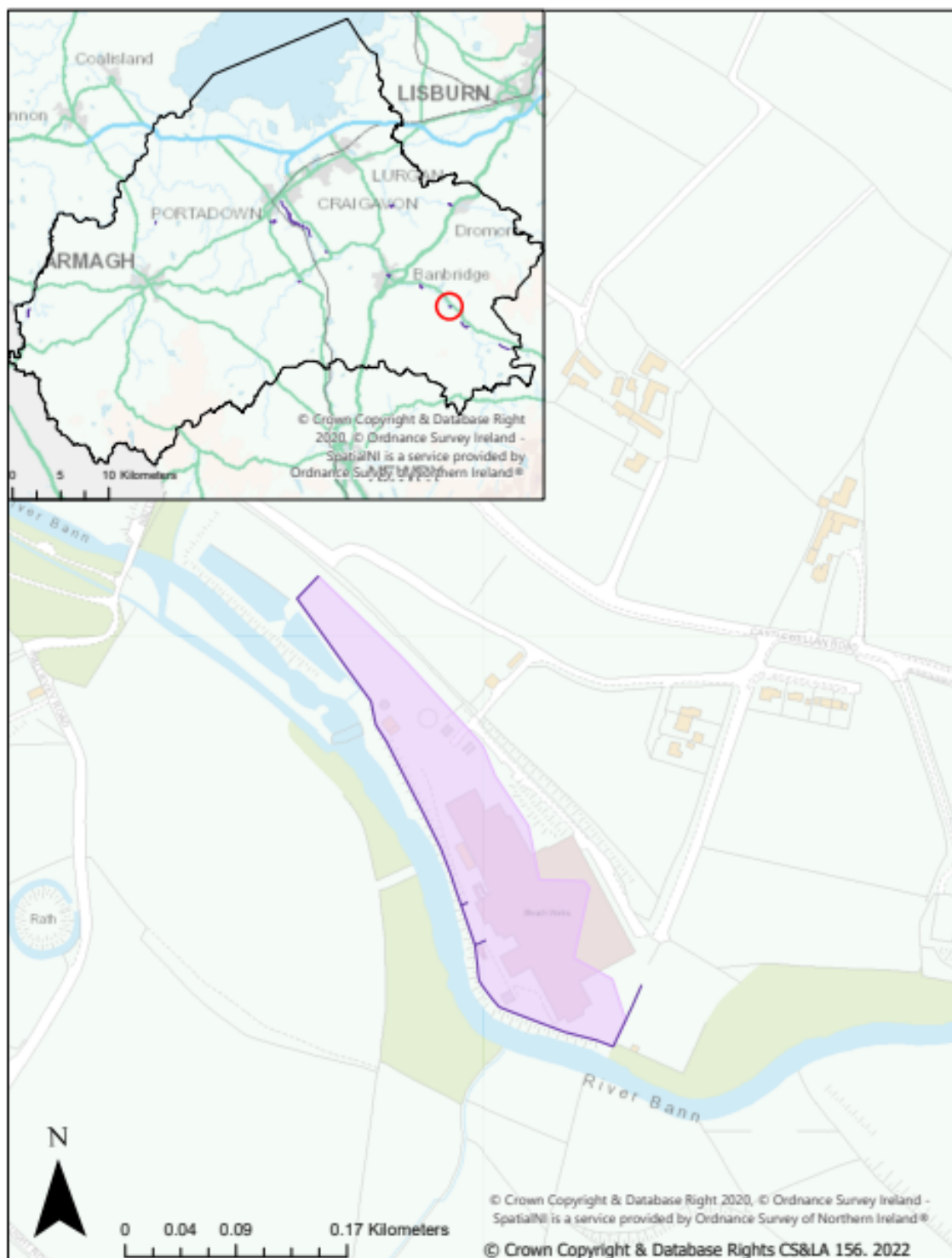


## Legend

- Flood Defence Structure
- ABC Boundary

## River Bann- Banbridge (Aughnacloy Road) Engineered Defence





### Legend

- Flood Defence Structure
- ABC Boundary
- Areas Benefiting from Defences

## River Bann- Banbridge (Castlewellan Road) Engineered Defence





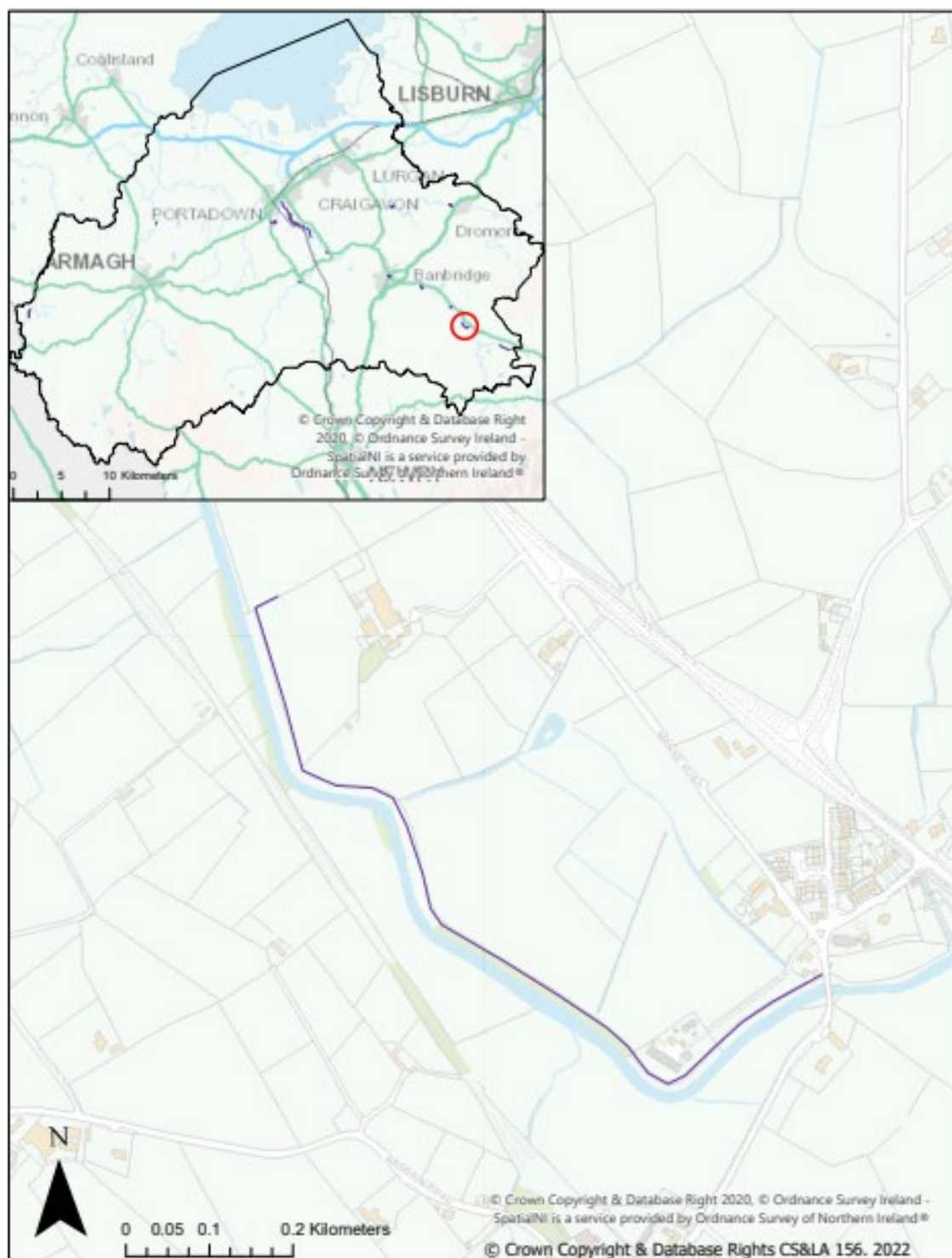
### Legend

- Flood Defence Structure
- ABC Boundary

### River Bann- Gilford Engineered Defence



#

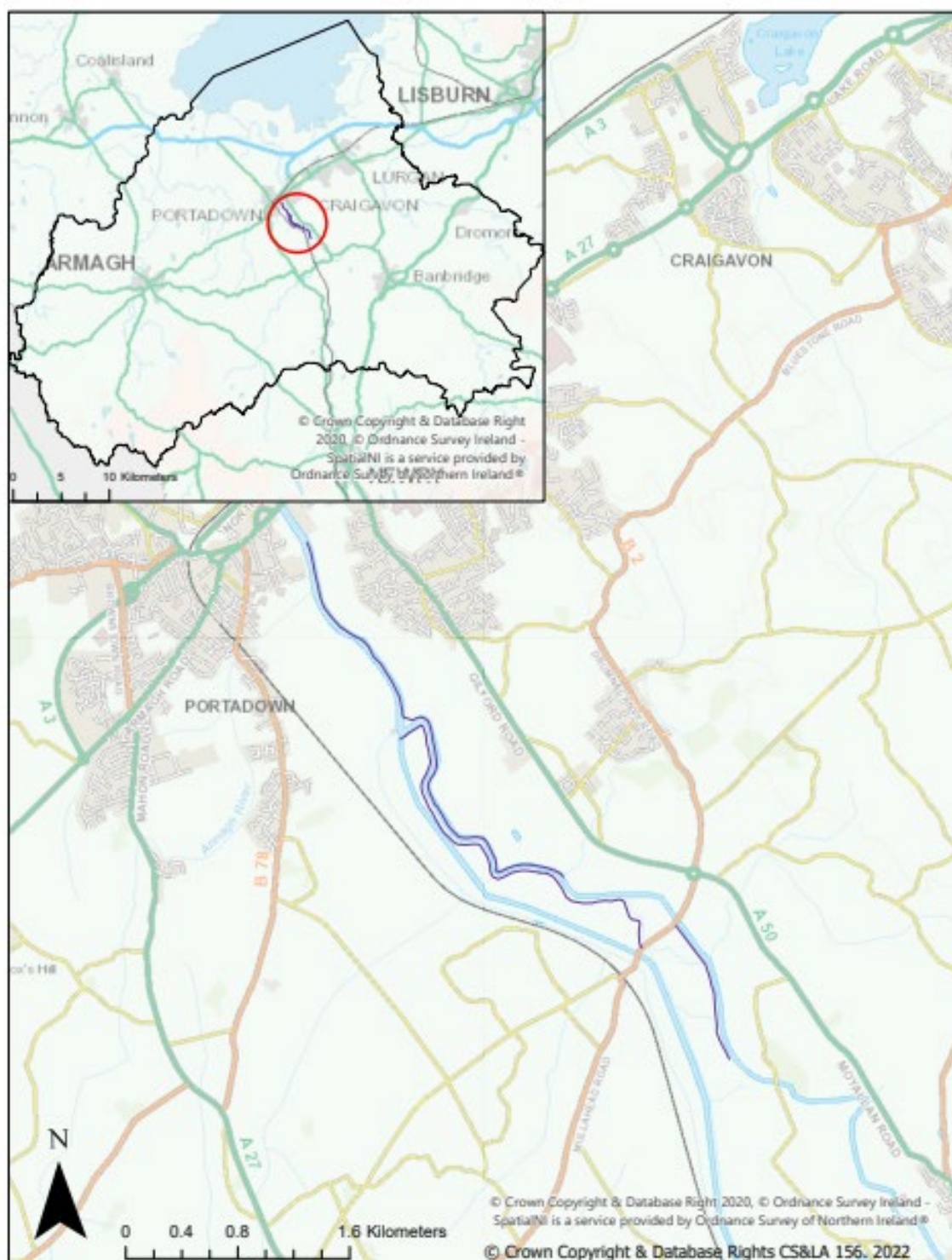


## Legend

- Flood Defence Structure
- ABC Boundary

## River Bann- Banbridge (Katesbridge) Engineered Defence





## Legend

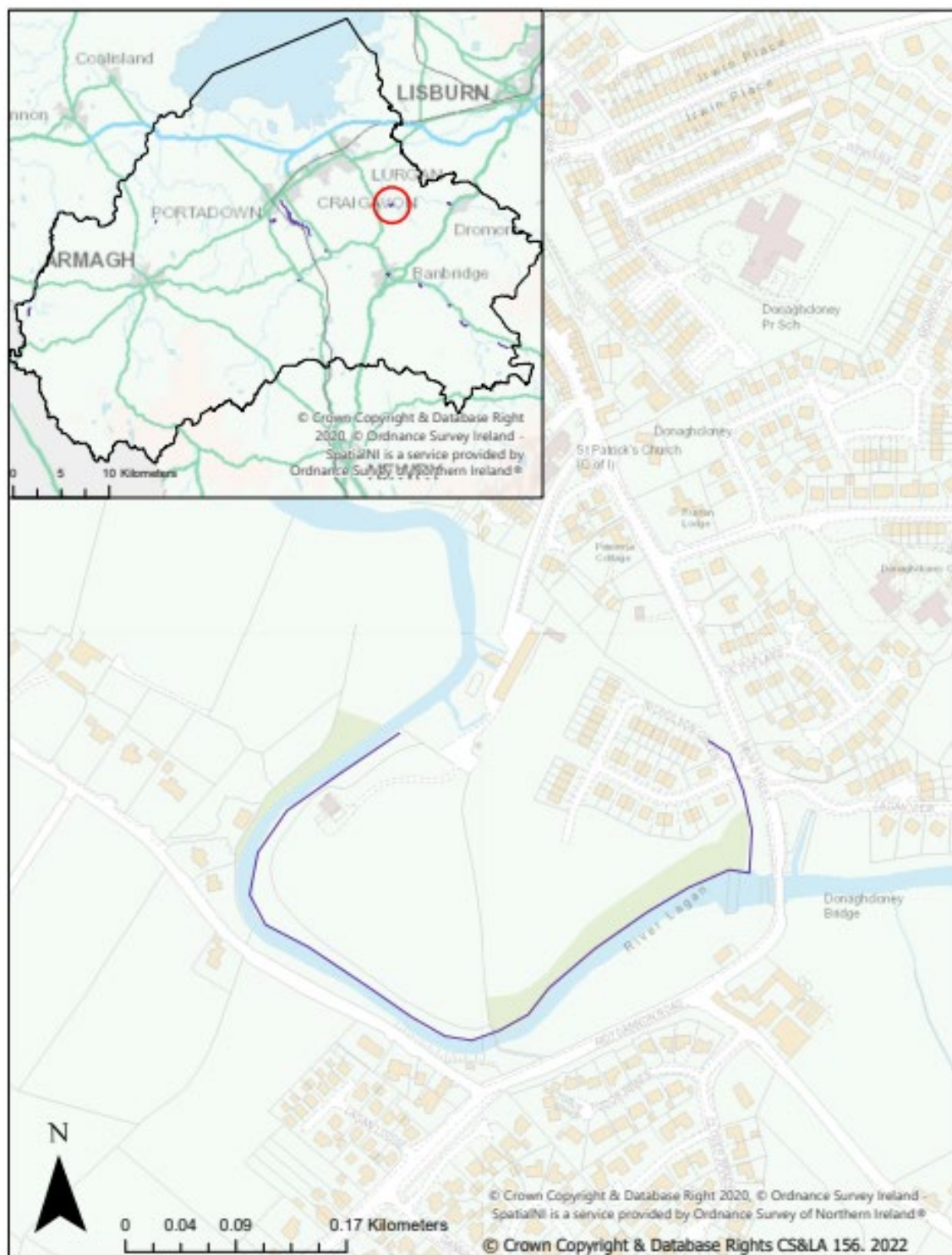
- ABC Boundary
- Flood Defence Structure

## River Bann- Portadown

Significant Agriculture Defence



Armagh City  
Banbridge  
& Craigavon  
Borough Council



## Legend

- Flood Defence Structure
- ABC Boundary

## River Lagan- Donaghcloney Engineered Defence





### Legend

- Flood Defence Structure
- Areas Benefiting from Defences
- ABC Boundary

## River Lagan- Dromore Engineered Defence



# INTERESTED IN DEVELOPMENT

in the Armagh City,  
Banbridge and  
Craigavon Borough

## **Please contact**

ABC Planning Department - Local Development Plan Team  
at Armagh City, Banbridge & Craigavon Borough Council

 0300 0300 900

 [ldp@armaghbanbridgecraigavon.gov.uk](mailto:ldp@armaghbanbridgecraigavon.gov.uk)

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