



Subject:	BCC Response to Rivers Agency Consultation on Flood Risk Management Plan 2015-2021
Date:	22 nd April 2015
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Is this report restricted?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	<p>The purpose of this report is to advise Committee of the Department of Agriculture and Rural Development's (DARD) consultation document on its draft Flood Risk Management Plan (FRMP) and the Council's proposed response to the consultation (attached as appendix A). The full consultation can be viewed at www.dardni.gov.uk/consultation-on-draft-flood-risk-management-plans; it closes on 22nd June and Rivers Agency propose to have the final plan in place by December 2015.</p>
1.2	<p>The main objectives of the Flood Risk Management Plan are:</p> <ul style="list-style-type: none">➤ To inform the implementation of land use policies to prevent flooding➤ To reduce the likelihood of flooding, where possible taking into account economic and environmental factors➤ To raise the awareness of flood risk and planning for an emergency response and recovery <p>The FRMP contains plans for each of the three River Basin Districts and within these sub-sections it has identified specific measures for 20 significant flood risk areas (SFRA); Belfast, which is located in the North East Basin, has been ranked highest of the 20 SFRA in Northern Ireland. This assessment was based on the strategic flood maps published by Rivers Agency at the end of 2013. The Belfast SFRA summary is from page 301 to 342 in the consultation document. It provides an overview of the history of flooding in the area, a</p>

1.3	<p>summary of the existing flood protection works, details of potentially significant flood sources and an assessment of the different flood risks and potential mitigation measures. In parallel with the development of the draft FRMP, a Strategic Environmental Assessment (SEA) and a Habitats Regulatory Assessment (HRA) were also carried out and have been reviewed as part of the consultation.</p> <p>This report is also linked to the update report from director of Property and Projects on the Strategic Drainage Board and work streams.</p>
2.0	Recommendations
2.1 2.2 2.3	<ul style="list-style-type: none"> • Members are recommended to agree the proposed consultation response to the draft FRMP. • They are also asked to agree that an internal officer group be established bringing together chief officers from the current directorates for Planning, Property and Projects and Health and Environmental Services. The purpose of the group would be to develop an integrated one council approach to engaging with the drainage agencies and others so as to influence effective land use policies and ensure a strategic and coordinated approach is taken to incorporating flood mitigation measures into the future development and regeneration of the city. • It is also recommended Members invite Rivers Agency to the June Committee to give a short presentation on Flood Maps (NI), an interactive map viewer that would enable Members to access the latest flood hazard information for Belfast.
3.0	Main report
3.1	<p><u>Key Issues</u></p> <p><u>The Draft FRMP</u></p> <p>The purpose of the Flood Risk Management Plan is to provide a holistic, structured approach to the management of flood risk in Northern Ireland and to inform decisions on reducing the adverse impact of flooding on human health, economic activity, cultural heritage and the environment. The plan includes a number of objectives for the management of flood risk and introduces proposed measures for achieving those objectives under the following themes:</p> <ul style="list-style-type: none"> • Prevention: avoiding construction of houses and industries in flood-prone areas including the application of Planning Policy Statement 15 'Planning and Flood Risk' (PPS15); adapting future developments to the risk of flooding; promoting appropriate land-use, agricultural and forestry practices.

- **Protection:** taking approaches, both structural and non-structural, to reduce the likelihood and impact of floods including maintenance of existing drainage and flood defence networks; new flood alleviation schemes; catchment based and surface water management including promoting Sustainable urban Drainage Systems (SuDS)
- **Preparedness:** informing the public about flood risk and what to do in the event of a flood; flood emergency response arrangements and exercising these; community engagement and building resilience; individual property protection and flood recovery/insurance/welfare issues.

There are four main sources of flooding – fluvial flooding from rivers, coastal flooding from the sea, surface water/pluvial flooding and flooding from reservoirs. Belfast is under threat from all these sources and in particular has a long history of surface water flooding dating back to the early 1900s. The draft plan does not include areas at risk from reservoirs as this information will not be available until the completion of the draft Reservoirs Bill which is going through the NI Assembly legislative process at this time.

It is estimated that £24m of resource expenditure and £36m of capital investment is required by the Drainage Agencies each year to maintain the drainage infrastructure in Northern Ireland and to execute a programme of flood alleviation projects to reduce flood risk. This excludes the operational costs in relation to emergency planning and the administration of PPS15 as well as the costs of other organisations including the emergency services, local councils and others who play a significant role in flood response.

Flood Risk in Belfast

Flooding is a significant risk to Belfast. It is generally accepted that the city is likely to experience more regular flooding in the future and in urban areas surface water flooding may increase due to the development of green spaces and the paving of gardens and driveways. Deforestation, agricultural draining and land management practices will also increase conveyances and flows in watercourses and increase flood risk lower down the catchment areas. Climate change predictions also suggest a rise in sea level, an increase in winter precipitation and an increase in the frequency and intensity of extreme rainfall events. The plan identifies the following risks

- A large proportion of the city centre lies within the 'undefended' coastal floodplain potentially leading, in extreme circumstances, to an area of around 2km² within the city centre being inundated to depths in excess of 2m. The present value of damage to the city centre from such an incident is calculated at £29m.

- Detailed modelling has reduced the number of properties identified as at risk from flooding from the sea from approximately 8000 properties to 2500 properties. Rivers Agency has appointed consultants to undertake the Belfast Tidal Risk Study and this is due to be completed by July 2015. The plan acknowledges that the tidal risk to Belfast is very real and needs to be managed.
- Up to 9800 properties are potentially at risk of flooding from rivers and around 6000 of these properties are also at risk of flooding from the sea.
- Over 5000 properties are at risk from watercourses in a major flooding event with the present value of damage from such an event calculated at £63m.

Response to the Consultation Document

The proposed response is constructive and makes it clear that the Council is broadly content with the methodology, objectives and measures. However it has suggested a number of changes to highlight things which could be incorporated in the plan to increase the potential impact of the mitigation measures. It has also highlighted alterations that are required following local government reform, the transfer of local planning to councils, soon to be followed by regeneration, and the current issues in relation to funding for emergency planning and community resilience work.

The response has suggested that the governance and implementation arrangements in the draft FRMP should be reviewed to take account of the fact that planning and future regeneration responsibilities will significantly impact on how the measures in the FRMP are implemented. It has highlighted that Belfast City Council is working with the community and city stakeholders to identify outcomes and produce a Development Plan for the city. It will be important for processes and effective arrangements to be established in the FRMP to ensure flood risk mitigation measures are considered and integrated in the future development and regeneration of Belfast.

The response also calls for greater integration in flood risk management planning and specifically refers to the fact that the plan does not clearly identify the links and synergies between the work of a number of strategic groups mentioned in the plan, in particular the Flood Investment and Planning Group, the Strategic Drainage Infrastructure Programme Board and the Storm Water Management Group.

Belfast City Council Approach

The Director of Property and Projects represents the Council on the Strategic Drainage Board. This group, in developing a Strategic Drainage Infrastructure Programme (SDIP), has recently identified a number of work packages. These work packages are closely

related to achieving the objectives of the FRMP and mitigating the flood risk in Belfast. It is proposed therefore that chief officers from relevant directorates across the Council form an internal working group to understand the synergies in both the FRMP and the SDIP so as to maximise the benefits of integrated working in the future development and regeneration of the city.

Members are advised that there will be internal officer liaison and coordination within the current directorates for Planning, Property and Projects and Health and Environmental Services and linked to the Strategic Drainage Board council representation so as to influence effective land use policies and ensure a strategic and coordinated approach is taken to incorporating flood mitigation measures into the future development and regeneration of the city.

Financial & Resource Implications

A number of the mitigation measures and governance / communication structures mentioned in the plan require significant input from Belfast City Council and the city's resilience forum (Emergency Preparedness Group) of which Belfast is a key partner.

Members will note that in recent government cuts the DoE withdrew its funding for 2015/16 for local government emergency planning including circa £90,000. The Chair of the Local Government Chief Executives Group has written to DoE regarding the wider implications of the withdrawal of the funding and the issue has been included in the Council's response to the consultation on the FRMP.

Equality or Good Relations Implications

Considered by DARD as part of the consultation process.

4.0	Appendices – Documents Attached
	<ul style="list-style-type: none">• Link to consultation document on the Draft Flood Risk Management Plan www.dardni.gov.uk/consultation-on-draft-flood-risk-management-plans.• Appendix 1 - BCC Response to the Consultation on the Draft Flood Risk Management Plan• Appendix 2 - letter from rivers Agency to CX