

Consultation Response Form

Consultation on the Draft Flood Risk Management Plans including, the Strategic Environmental Assessment and Habitats Regulatory Assessment.

Your details

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Please select from which of the following groups you belong to:

- Individual
- Individual at perceived flood risk
- Utilities/Infrastructure provider
- Business sector
- Consultant / contractor
- Environmental management
- Academia/Research
- Farming / land management
- Local Government
- Central Government
- Leisure/tourism
- Manufacturing
- Transport / navigation
- Developer
- Other (*please specify below*)

After the 6 month consultation period we will publish our response document and will let you know what people have said, how we have taken their comments into account and what changes will be made before we publish the final FRMP by 22nd December 2015.

Freedom of Information Act 2000 – Confidentiality of Consultations

Please note that your response and the responses of others to the consultation may be disclosed on request. The Department can only refuse to disclose information in exceptional circumstances. Before you submit your response please read the paragraphs in the consultation document on the confidentiality of consultations which provide guidance on the legal position about any information given by you in response to this consultation.

Questions on the Draft Flood Risk Management Plans:

Question 1

Do you agree that, using the methodology noted, the draft plan highlights the most significant flood risk areas in each of the three River Basin Districts?

Yes

No

If not, please give your reasons below.

Question 2

Do you understand and agree with the objectives as described in the draft plan?

Yes

No

If not, please give your reasons below.

We are broadly content with the objectives and their associated activities however we would suggest:

- Under economic activity:
 - o There could be a reference to loss of agricultural land and the impact on livestock (unless a separate objective is made for animal welfare)
 - o The economic damage should include damage to infrastructure itself as well as the costs of recovery i.e. repairs, cleaning etc.
- Under human health and social objectives:
 - o Reference should be made to raising awareness of the dangers of flood water (or change 'raise awareness of the consequences of flood risk' to 'raise awareness of the impact and dangers of flood risk')
 - o A mental health and wellbeing reference should be included.

Alternatively it might be more appropriate to rationalise and combine the objectives to provide a clear and concise statement of intent, for example

The flood risk management plans will

Contribute to a strong economy and improved health and social wellbeing by:

- Minimising damage to property, businesses (including farms and agricultural businesses) and infrastructure
- Minimising disruption to transport and other important services

Question 3

Do you agree that there is the right balance between the social, economic and environmental objectives?

Yes

No

If not, what could be done to redress the balance?

Yes, however the balance might be more obvious if the objectives were reformed into a clear statement of intent which recognises the synergies between the three elements.

For example:

The flood risk management plans will

Contribute to a strong economy and improved health and social wellbeing by:

- Minimising damage to property, businesses (including farms and agricultural businesses) and infrastructure
- Minimising disruption to transport and other important services
- Prioritising investment in mitigation measures in order to maximise economic benefits and social wellbeing
- Optimising the economic return on flood risk management investment
- Minimising the costs associated with recovery from flooding
- Protecting the environment from the impact of flooding

Question 4

Do you agree with the proposed measures identified for each of the significant flood risk areas?

Yes

No

If not, what would you change and why?

The Council is mainly content with the flood alleviation measures being divided into the 3 areas of prevention, protection and preparedness. However when looking at the detail of the measures it is concerned that the plans do not take account of recent reforms in local government. The changed structures, with 11 new councils and functions such as planning and regeneration either moved or moving to local government, will significantly impact on how the measures in the plans are implemented. Belfast City Council, like the other 10 councils, is responsible for leading community planning. It is working with the community and city stakeholders to identify outcomes and produce a local development plan for the city. It will be important for processes and effective arrangements to be established to ensure flood

risk mitigation measures are considered and integrated in the future development and regeneration of Belfast. This will be particularly important if the plan is to achieve its objectives in terms of economic activity, protecting the environment and health and social wellbeing.

Consideration will need to be given as to how the Rivers Agency Planning Advisory Unit will link in with the 11 new councils and how the new planning arrangements will impact on the application of PPS 15. Other partnership and governance arrangements detailed in the consultation document will also require to be reviewed as certain forums no longer exist, for example, the Local Government Emergency Management Group (LGEMG). The Sub-regional Emergency Preparedness Groups will continue to meet while a review of local government civil contingency arrangements is carried out on behalf of the Local Government Chief Executives Group but there is still some uncertainty as to what future arrangements will look like, particularly as DoE has withdrawn its emergency planning funding for councils, funding which is used to enable councils to support the coordination and communication activities and some mitigation measures referred to in the FRMP.

The Council welcomes the way in which the costs of implementation have been set out in the plan and assumes that following the consultation the detail and costs associated with the recently approved Individual Property Protection Scheme will also be included in the local plans.

In terms of further development of the plans it is suggested that the processes for implementation should be more clearly defined. Section 8.2.2 of the consultation document refers to 'Greater integration with all flood protection, drainage and watercourse infrastructure providers in developing joint schemes with multi benefits' and 'A proactive, strategic approach, in the development of flood protection measures and work programmes' and it refers to the strategic Flood Investment and Planning Group but it is unclear in the plans how the agenda of that group integrates with local development and regeneration agendas, or with the other strategic groups. The governance arrangements and joint working between agencies although much improved since the serious flooding in 2012 still appear slightly disjointed and the links and communication between the numerous groups mentioned in sections 4.3 and 4.4 of the consultation document are unclear. It is suggested that the links, along with the integrated processes should be more explicit in the final FRMP, particularly the links to the Sustainable Infrastructure Programme Board as there will be significant synergies between the plan and the Strategic Investment Infrastructure Programme. This alignment and integration will be important in maximising the benefits from flood mitigation measures. Alignment between the FRMP and Council Local Development Plans will also be important in directing investment to maximise impact.

Previously the Council suggested there may be benefits in merging a number of the groups at a strategic level to establish a single forum or overseeing organisation to harmonise the work that is currently being undertaken by the drainage agencies and effectively connect with other organisations such as the councils to support working towards strategic and comprehensive integrated planning approaches to flood alleviation in local council areas. The FRMP alludes to a recently formed group the Strategic Drainage Investment Programme Board. If the role of this group is to bring

together work to improve drainage infrastructure and mitigate against flooding this should be clearly detailed in the FRMP.

Further to the general comments above the following are additional specific suggestions

- Under flood prevention there should be measure activities regarding:
 - o Raising awareness with the new council planning departments of their flood risk zones but also areas where development in non flood risk areas could cause increased flooding in those zones, i.e. have a knock on effect (this may include a catchment wide approach)
 - o Designating watercourses which are currently undesignated but which have been identified as directly contributing to flooding. It may also be helpful to consider the usefulness of temporary flood defences which could be deployed to protect properties on a wider geographical basis e.g. large scale flood barriers, hesco bastions and geo barriers.
- Should catchment based management fall under flood prevention and include reference to land use planning, sustainable agricultural land use and countryside management to reduce flood risk elsewhere within the catchment?
- Under flood prevention surface water management the measure activity could be extended to say: promote the application of Sustainable urban Drainage Solutions (SuDS) to all new developments and to all alterations being undertaken where SuDS could be added retrospectively to add benefit, particularly large public funded works (the ongoing maintenance of these systems would also need to be considered).
- Should individual property protection fall under flood protection rather than preparedness?
- Under flood preparedness - community engagement; it is suggested that the regional community resilience work to develop community emergency plans should be described as more than warning and informing. This work is to do with education and awareness alongside increased community preparedness and therefore significantly contributes to building community resilience. The contacts also enhance warning and informing when there is the threat of flooding.
- Under flood preparedness a separate measure is required (linked in to communication of flood risk) in relation to the broader education of the public. This should include education of all ages (including children) in relation to the hazards from flood water, how their actions can cause flooding in their area or in other areas e.g. paving their driveways and also the potential ways to help themselves such as individual property protection, having their own emergency plan and knowing whether or not they are at risk.
- Under flood preparation - communication of flood risk there should be an additional point to liaise with known vulnerable populations e.g. residential and nursing homes in flood risk areas to ensure they have adequate emergency plans in place.

We would also note that the plans emphasise the importance of flood emergency response and testing as well as community engagement. These items are currently undertaken by many organisations without adequate resource or funding. This may put the ongoing delivery of these measures at risk.

Question 5

What measures do you think should be given the highest priority to manage the flood risk in your area?

Please explain what they are and why they should be included?

- With the transfer of local planning to the Council and regeneration to follow in 2016 developing integrated approaches to ensure the effective application of PPS15 is important. These integrated approaches should also ensure that flood mitigation measures across the areas of prevention and protection are integral considerations in the future development and regeneration of the city. Related to this, and as the Belfast City Council boundaries have recently extended, further work is required to understand the catchment wide issues particularly where flooding in Belfast is caused by sources from outside the area.
- Multi-agency engagement needs to continue to identify and deliver further options to reduce flooding such as catchment based management, sustainable urban drainage solutions and temporary flood defence options. The roll out of the individual property protection scheme will also be of great interest to residents in Belfast as a large number have no identified physical scheme to reduce flooding in their area at this time.
- Alongside these preventive approaches ongoing awareness raising, education and community emergency planning is required. This is subject to resource within the various contributing organisations.
- In physical terms the continued identification and delivery of flood alleviation schemes will be vital as many areas of Belfast will not experience reduced flood risk without this. In addition recent flooding has highlighted that maintenance of the existing drainage infrastructure is essential and it was evident that lack of maintenance as a result of decreased funding contributed to flooding in some areas. Again the Council would suggest the need for a proactive and strategic approach to developing joined up risk based maintenance programmes.

No

If yes, explain what could be done.

- Belfast City Council has a role to support other responding agencies in dealing with flood emergencies when its residents are directly affected including the co-ordination of recovery. The Council would seek to provide its resources such as buildings, staff, expertise and equipment to assist where possible. If the government continues to implement a scheme of emergency financial assistance, the Council will continue to administer the scheme on its behalf.
- The Council is also a key partner in engaging with local communities to enhance their preparedness. It raises awareness across the city and provides resources via its 'City Matters' magazine, with a pull out and keep flood insert placed in the June edition each year. It uses other opportunities to engage with residents and has worked with other agencies to support the development of a number of community emergency plans and a flood warden scheme in one area of the city. However resource is limited so it is difficult to extend this work throughout the city.
- With the transfer of local planning to the Council and regeneration to follow in 2016 there is an opportunity to develop integrated approaches to ensure the effective application of PPS15 and to ensure that flood mitigation measures across the themes of prevention and protection are integral considerations in the future development and regeneration of the city.
- Potential exists within Belfast for the implementation of a wide variety of

Question 7

Are there things you think should be done to improve the co ordination of river basin and flood risk management planning?

Yes

No

If yes, explain what could be done.

- It is suggested the plans, in particular the governance and implementation arrangements should be reviewed in light of the changes to local government in terms of the 11 new councils and the delivery of local civil contingencies. Council and policing district boundaries are now aligned and it is suggested that consideration should be given to ensuring effective channels of communication are established with the new councils located in the river basin districts.
- It is suggested that the 'Floods Directive Consultation Network' should be reviewed to ensure it is optimising coordination to achieve the objectives of the flood risk management plans. There may be an opportunity to rationalise the number of groups but increase the productivity; for example, instead of having a separate stakeholder group and three flood forums it might be more effective to have a stakeholder group for each of the local river basin districts. These groups could meet every four months and report directly to the EU Floods Directive Steering Group. Each stakeholder group could take responsibility for local engagement on an annual basis. This would better support coordinated engagement with local councils as they are eleven separate organisations with no overarching organisation that can effectively represent them on the existing stakeholder group. This is particularly important given that local planning has transferred to councils and regeneration will transfer in 2016.
- It is suggested that a more joined up approach at a strategic level would also facilitate more efficient and effective flood risk management planning and implementation.
- It is important that the co-ordination of river basin and flood risk management planning continues to be undertaken on a multi-agency basis with the participation of all relevant agencies and the application of joint funded projects where these are the most economical and suitable approach.
- More detailed information could be shared at a local level in relation to potential schemes on a wider catchment basis which could reduce the risk at lower levels within the catchment.

Questions on the environmental report:

A strategic environmental assessment (SEA) has been undertaken to consider how the draft flood risk management plan could affect communities and the wider environment. The environmental report presents the results of this assessment and summarises the effects that are significant for the river basin district.

Question 8

Do you agree with the conclusions of the environmental assessment?

Yes

No

If not, please explain why.

Questions 9

Are there any further significant environmental effects of the draft plan which you think should be considered?

Yes

No

If yes, please describe what they are.

Question 10

Are there further mitigations or opportunities that should be considered for the plan?

Yes

X No

If yes, please explain.

In terms of the Belfast Plan:-

- It would be helpful if an appendix could be added outlining where the areas for further investigation are?
- The plan should be reviewed to include information on the areas of the old Castlereagh and Lisburn Councils which are now part of Belfast?
- It is suggested the summary of the Sydenham area be updated in relation to the greenway project?
- It is suggested that Belfast's 2014 flooding be added to the history and included in the areas at risk if relevant?
- It is suggested that the areas for community engagement on page 342 should be reviewed following the work which has been undertaken to the Connswater River and the flooding of 2014.