

Draft Flood Risk Management Plan 2021-2027 including, the
Strategic Environmental Assessment and
Habitats Regulations Assessment

Consultation Response Form

Responses should be received no later than
Friday 25 June 2021

This Consultation Response Form (CRF) aims to provide you with an opportunity to comment on the draft:

- Flood Risk Management Plan 2021-2027 (FRMP)
- Strategic Environmental Assessment (SEA) and
- Habitats Regulations Assessment (HRA)

It is intended that through the CRF you will have an opportunity to put forward your comments, to help inform the FRMP, SEA and HRA for Northern Ireland.

The CRF should be considered in conjunction with the consultation document available on the Department's website at the following link:

<https://www.infrastructureni.gov.uk/consultations/consultation-draft-flood-risk-management-plan-2021-2027-second-cycle>

Additional copies of both the CRF and the consultation document can be obtained from the Department for Infrastructure:

Email: floods.directive@infrastructure-ni.gov.uk

Writing to:

Flood Risk Management Plan Consultation Response

Department for Infrastructure

Water and Drainage Policy Division

Room 1-22, Clarence Court

10-18 Adelaide Street

BELFAST

BT2 8GB

Alternative formats of the CRF can also be made available on request and you should forward any such requests using one of the methods detailed above.

Responses should be received no later than **17:00 on Friday 25 June 2021**. All responses received by this date will be considered.

Please note that all responses will be treated as public, and may be published on the Department's website. If you do not want your response to be used in this way, or if you prefer for it to be used anonymously, please indicate this when responding (The Freedom of Information Act 2000 and

Environmental Information Regulations 2004 gives the public a right of access to any information held by a public authority, namely, the Department in this case).

Following consideration of all responses, a report may be published on the Department's website.

Thank you for taking the time to complete this CRF and providing your comments.

I am responding

As individual

On behalf of an organisation

Your Details

Name: Belfast City Council

Postal address (including postcode): BT1 5GS

Email address: mclernonr@belfastcity.gov.uk

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*)

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, SEA and HRA by 22 December 2021.

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 Plan

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.

Enter text here

Please add below any additional comments you may wish to make about the methodology.

Enter text here

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.

Enter text here

Please add below any additional comments you may wish to make about the objectives.

Welcome the consideration of the impact of Climate Change for the main sources of flooding and the measures to support the objectives of the Water Framework Directive and contribute to the achievement of good ecological potential/status for waterbodies. However consideration of other Directives such as the Habitats and Birds Directives and environmental opportunities

should be taken for example habitat creation or restoration or opportunities to address environmental pressures such as IAS. This is an opportunity to address both climate and biodiversity issues.

Whilst the inclusion of the general objective To protect and enhance the natural environment and cultural heritage is welcome without specific actions and measures there is likely to be limited benefits achieved.

Welcome the inclusion of the opportunity for Natural Flood Management but this needs to be carefully planned collaboratively across stakeholders and adequately resourced.

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? Please give your views below.

Belfast City Council welcomes the opportunity to respond to this strategic consultation, the Draft Flood Risk Management Plan. Long term investment in Flood Risk Management is required to meet the ambition for growth of the City and to alleviate the impacts of climate change.

We support the adoption of an approach to the provision of Flood Risk Management which promotes holistic and integrated solutions that achieve multiple benefits at reduced cost and disruption. Whilst it is recognised that significant investment will be required in more traditional 'hard engineered' infrastructure we welcome the acknowledged contribution that other sustainable measures such as Green & Blue Infrastructure and Sustainable Drainage Systems (SuDS) can deliver. This sustainable approach is supported by both the Local Development Plan (LDP) as set out in the Draft Plan Strategy vision, aims, objectives and policies as well as in the council's Green and Blue Infrastructure Plan, and the Belfast Resilience Strategy.

We welcome the work undertaken to date to address Flood Risk and call for a coordinated, collaborative approach, working with Council where appropriate to ensure a balance between the social, economic and environmental needs of Belfast. Human health should be the foremost

priority however we welcome the focus on economic and environmental objectives and the desire to have a balanced approach.

Under the Environment and Culture objective we support the commitment that the Climate Change flood hazard maps will be updated to take account of the latest IPCC assessment from 2018 (UKCP18) rather than relying on the 2009 data. This is positive given that UKCP18 predicts higher increases in Sea Level Rise than the earlier UKCP09 as the UKCP18 takes into account the potential polar ice sheet melting. The latest CCC advice, is that the UK needs to adapt to a minimum average global temperature rise of between 1.5 and 2°C for the period 2050 – 2100 and consider the risks up to a 4°C warming scenario. In addition, the objective “to consider the impact of Climate Change for the main sources of flooding” could be strengthened “to consider and prepare for the impact of Climate Change for the main sources of flooding. Given the impact and costs associated with localised surface water flooding in Belfast, it may be beneficial to include an explicit objective (under Economic Activity) “to promote the use of sustainable drainage systems to reduce surface water runoff and help reduce pressure on existing drainage network” although it is noted that these measures are included in the measures elsewhere in the report. The report highlights the opportunity to use natural flood management upstream of flood risk areas to hold water back. As well as the benefits, in terms of flood risk, Climate Change adaptation, water quality and Biodiversity, it would also be useful to include the potential for these measures to contribute to carbon sequestration (p37). This is important as it has implications for reducing the costs associated with NI achieving a net zero target. In this respect, the document could include a higher level of ambition by including an objective (under Environment and Cultural Heritage) “to restore naturally functioning wetland and river systems where possible”.

Question 4

Do you agree with the proposed measures identified for each of the Areas of Potential Significant Flood Risk (APSFR)?

Yes

No

If not, what would you change and why? Please give your views below.

Yes there has been significant engagement with the Living with Water Programme by Belfast City Council and we anticipate playing a major role in the strategic development, local planning, and operational delivery aspects of the programme. We support the plans for flood alleviation measures and use of SUDS and sustainable drainage interventions in areas most at risk and where water can be better managed to prevent flooding in and around Belfast. It must also be noted that until the LWWP is fully implemented, existing partnership engagement remains

critical to plan, respond and recover from the flooding risks which are faced by the City. Such linkages include for example Belfast City Council's Emergency Plan, Belfast Emergency Preparedness Group (Multi-agency Partners) and the Regional Community Resilience Group (Multi-agency Group focused on promoting and supporting resilient communities). The risks posed to Belfast from tidal inundation, particularly in the City Centre are sobering – Belfast Tidal Flood Alleviation Scheme with 8.6km of new flood defences seeks to address this, however the scheme is complex with lots of engagement with different land owners required. This is taking longer to deliver than initially envisaged. This is only one scheme, so in order to implement the LWWP and integrated plan huge emphasis must be placed on delivering a collaborative approach by all partner agencies. In addition we encourage the Flood Risk Management Plan to include costed proposals and identify sources of finance and investment where possible.

Under flood prevention we propose a separate measure in relation to community engagement and involvement on how their actions can help reduce surface water management and alleviate flooding such as rainwater harvesting, green roofs, rain gardens etc but also in terms of land management.

Welcome the inclusion of SUDs but the adoption and future management of SUDs specifically soft SUDs needs to be addressed. The LWWP identified Green spaces principally BCC land for flood attenuation measures but this needs to be carefully designed, consulted upon and resourced.

Agree with the flood alleviation measures being divided into three main areas of prevention, protection and preparedness for Belfast as an Area at Potential Significant Flood Risk. The Department is encouraged to be mindful of work being delivered by Belfast City Council and partnership agencies implementing the Belfast Agenda. A number of these projects are multiple problem solvers which, with a collaborative approach can help mitigate against flooding as identified within the Area at Potential Significant Flood Risk as well as other problems. This draft document broadly aligns with the SPPS (Strategic Planning Policy Statement) and PPS15 (Planning Policy Statement) in terms of Planning but goes further to specifically recognise the multiple benefits of SuDS (Sustainable Urban Drainage Solutions) relating to surface water flooding.

Specifically under 5.1.7.3 Preparedness suggest the wording around community resilience 'this is on hold as flooding has not been experienced in a number of years' is reviewed to reflect that community resilience is continuously reviewed and maintained via the Regional Community Resilience Group. Whilst the demand from communities at risk of flooding does fluctuate based on recent events RCRG members continue to engage and support community resilience recognising the valuable role it plays in education and awareness alongside increased community cohesion.

Under flood preparedness a separate measure is suggested in relation to the broader education of the public. This could 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.

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 given a high priority?

The Council would note that many of the proposed measures within the consultation impact on Council assets and will require significant collaboration. Council support the ongoing flood alleviation measures and recommend these be reviewed on an ongoing basis to take into consideration new research and projections relating to the impact of the climate emergency. Belfast City Council has worked with a wide range of partners to develop the Belfast Resilience Strategy and structures in the city to address Climate such as the Belfast Climate Commission and the Belfast Resilience and Sustainability Board. We recommend engagement with these bodies as the Flood Risk Management Programme progresses. The Council is working closely with the Department on a number of pilot projects within the Living with Water Programme, and will be playing a key role in terms of delivery moving forwards. For projects to be successful the Council urges that these need to be co-designed with early input from specialists and planned with partners and stakeholders taking account the following important areas:

- Meaningful engagement with local communities including park users, local residents and stakeholders e.g. sports clubs;
- Understand current site usage, feasibility and commerciality;
- Open space typology, functionality and ensuring a balance of local needs;
- Existing natural environment including current ecosystem services benefits and constraints such as Invasive Alien Species (IAS);
- Current and future management and maintenance requirements and costs. Depending on proposals this could include the need for new machinery, additional staff resources and management of increased invasive species; and
- Early ecological input is required to maximise opportunities. We encourage the implementation of natural flood management (NFM) that protects, restores and mimics the natural functioning of rivers and the coastal ecosystems.

Belfast has a paucity of open water and many rivers and streams have been partially or almost fully culverted. The use of NFM will enable the restoration and creation of riverine and coastal habitats which are key priorities to address biodiversity loss.

The LWWP and integrated plan provides a major opportunity to address broader environmental issues but most especially a unique opportunity to contribute to nature recovery in Belfast.

Question 6

Do you see any ways that you or your community can support and contribute to any of the measures set out in the draft Plan to reduce the flood risk?

Yes

No

If yes, explain what could be done.

Belfast City Council leads on a number of key enabling strategies and initiatives in the city, including the Belfast Agenda, Belfast Resilience Strategy, and the Bolder Vision (in partnership with DFI and DFC). Belfast City Council is responsible for the Local Development Plan and for managing planning applications and development within the city. As such Council is a key partner and will work with relevant partners to ensure Flood Risk is managed effectively through our existing and emerging strategic frameworks.

Belfast City Council has a role to support other responding agencies in dealing with flood emergencies when its residents are directly affected including the coordination of recovery. The Council would seek to provide its resources such as buildings, staff, expertise and equipment to assist where possible. BCC continues to administer the Scheme of the Emergency Financial Assistance on behalf of the Department for Communities for homes that have been 'severely inconvenienced' by flooding.

The Council is also a key partner in engaging with local communities to enhance their preparedness. It raises awareness across the city with a number of community resilience groups established in flooding hot spots. The work is coordinated via the Regional Community Resilience Group.

Belfast City Council (BCC) launched a Green and Blue Infrastructure Plan (GBIP) for Belfast in 2020 which outlines how vegetated areas (the green) and waterways (the blue) can provide a broad range of economic, social and environmental benefits in and around our more urban areas. The GBIP recognises that these natural and semi-natural assets are increasingly seen as 'infrastructure' and like any type of infrastructure, these assets will only continue to provide us with benefits if we actively plan, invest in and manage them to ensure that they are utilised sustainably. To do this, it sets a vision that by 2035, green and blue infrastructure will be strategically planned to enhance ecosystem services that benefit everyone visiting, living and working in Belfast. This now provides a solid foundation for progressing the Living With Water Programme approach across the plan area. Furthermore, there are obvious community cohesion and wellbeing benefits to be derived from investing in the development and expansion of blue and green infrastructure that serve as greenways and open spaces; a catalyst for increased biodiversity, and more active and sustainable travel.

The Council, working alongside key partners, has already demonstrated the success of taking such an approach in terms of the use of urban green areas to prevent flooding through the exemplar £40m Connswater Community Greenway project in the East of the city. East Belfast had a history of severe flooding. The 2007 flood was the largest on record with 340 flooded properties within the catchment of the Loop, Knock and Connswater rivers. Consequently, a number of at risk areas were identified where flood alleviation measures were necessary. In 2006 funding was secured from the Big Lottery's 'Living Landmarks Programme' to develop and build a 9km linear park scheme. It became apparent that construction work for the flood works and the park could be combined. Because both proposals involved works along the same river corridors there were many areas of overlap which allowed the project to be designed in such a way that it created both an enhanced urban asset and provided flood alleviation measures. This joined-up approach minimised disruption to local communities and businesses affected by the works and delivered better value for money. It also meant that the scheme provided 1,700 properties within East Belfast with the national standard of flood protection against fluvial and tidal events.

The Council is already working closely with the Living with Water Programme on a number of projects across the city including pilot projects at Belfast Castle, Ballysillan Playing Fields and the new Forth Meadow Community Greenway project and would welcome the opportunity to work closely with relevant partners to identify other projects in the city which could present opportunities for joint working.

The Plan is Central and Local Government focussed however there is a major opportunity to engage and involve citizens and stakeholders through the management of private assets, buildings and land to reduce or slow surface water for example through rainwater harvesting, retention of natural areas in gardens, planting of hedgerows and trees, creation of open water, permeable paving, green roofs etc.

Soil and land management is also key area to address including soil structure, soil compaction and supporting sustainable agricultural practices. These issues are not confined to rural areas and a collective approach across all stakeholders including business and private individuals is required within an urban context.

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.

Ensure Belfast City Council and relevant stakeholders are involved in the strategic development, local planning, operational delivery, monitoring and review of the programme. Engage with key structures including those within the Belfast Community Planning Partnership and in particular those which address the impact of the climate on the city.

Questions on the environmental reports (SEA and HRA)

A Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) have been undertaken to consider how the draft Flood Risk Management Plan could affect communities and the wider environment. These reports present the results of these assessments and summarise the effects that are significant for the river basin districts.

Question 8

Do you agree with the conclusions of the environmental reports?

Yes

No

If not, please explain why.

Enter text here

Question 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.

The risk of IAS (Invasive and Alien Species) should be considered and addressed within the Plan given the potential to exacerbate flooding and pollution issues in particular sedimentation which is a key issue across Belfast. Aquatic and riverine IAS are a major concern with significant environmental, economic and social repercussion across NI. Unfortunately this is an area which is under resourced and without mechanisms to enable a collaborative approach to address issues such as IAS along entire watercourses. A mutli-agency collaborative approach is required with central government co-ordination and resourcing to address these complex issues.

Question 10

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

Yes

No

If yes, please explain.

Enter text here

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