

The Response to the Public Consultation on the draft Flood Risk Management Plans

Department of Agriculture and Rural Development, Rivers Agency

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1. Introduction

European Directive 2007/60/EC came into force in 2007 and has been transposed in law through the Water Environment (Floods Directive) Regulations (Northern Ireland) 2009. The legislation requires member states to establish a framework to identify and manage potential significant flood risks through the production of Flood Risk Management Plans (FRMPs). The FRMPs are aimed at reducing the adverse impact of flooding on human health, economic activity, cultural heritage and the environment within twenty Significant Flood Risk Areas (SFRAs) that have reported to the European Commission. The FRMPs have been developed using a catchment based approach that addresses all aspects of flood risk management such as prevention, protection and preparedness and include a broad range of mitigation measures aimed at reducing the potential significant risk from all flood sources (i.e. rivers, sea, surface water and reservoirs) in a sustainable way.

As the Floods Directive is closely aligned with Water Framework Directive, their respective FRMPs and River Basin Management Plans are produced and coordinated at the same River Basin District level namely, the North Eastern River Basin District (which lies solely within Northern Ireland) and two cross-border International River Basin Districts, the North Western and Neagh Bann.

In line with the requirements of the Floods Directive and as part of the process of developing the final FRMPs by December 2015, Rivers Agency (RA) issued draft FRMPs for Northern Ireland for public consultation in December 2014. Through this consultation exercise, which ended on 22 June 2015, the Department has sought to obtain the views of the public and its statutory consultees on the draft FRMPs and will consider all of the representations received in the preparation of the FRMPs which are to be published by 22 December 2015. As well as seeking general comments on the draft FRMPs, specific comments were also sought on the following consultation questions:

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?

Question 2

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

Question 3

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

Question 4

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

Question 5

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

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?

Question 7

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

Questions on the Environmental Report

Question 8

Do you agree with the conclusions of the environmental assessment?

Questions 9

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

Question 10

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

2. Consultation

RA launched the public consultation on the draft FRMPs for each RBD on 22 December 2014 and the consultation ran until 22 June 2015.

The public consultation gave stakeholders the chance to give their views on the draft FRMPs for the North Eastern, Neagh Bann and North Western River Basin Districts.

The draft FRMPs included detailed information on the 20 most Significant Flood Risk Areas (SFRAs) in Northern Ireland along with proposed measures to reduce flood risk under the three mitigation approaches of Prevention, Preparedness and Protection.

Feedback from the consultation will assist RA to develop the final FRMPs which will be published at the end of 2015.

3. Engagement with stakeholders

The consultation was launched on 22 December 2014 and advertised in the main local newspapers and on the Department's website. In addition, specific notification of the consultation was issued to the organisations and groups listed in **Annex C**.

4. Responses to consultation

A total of 28 responses were received:

- 8 from Councils / Local Government
- 5 from Government bodies
- 5 from environmental organisations
- 4 from fishing organisations
- 2 from blue light responders
- 1 from farming Industry
- 1 from a political party
- 1 from an independent consumer organisation
- 1 from a professional engineering organisation

BRIEF RESPONSES (5No)

1 organisation made a brief response by e-mail.

4 organisations made brief responses on the proforma.

SUBSTANTIVE RESPONSES (23No)

8 organisations made full responses on the proforma.

6 organisations made full responses on the proforma and included additional information.

6 organisations responded by letter / memo and did not complete the proforma.

1 organisation responded by Email and included an annotated digital copy of the draft FRMP.

2 organisations made an extensive response but not on the proforma.

The following sections provide discussion on the key issues highlighted by respondents in respect of each of the consultation questions and the Department's response.

Further details of specific comments raised in respect of each consultation question and the Department's response to those comments are set out in **Annex A**.

A list of Letter based Responses and comment are set out in **Annex B**.

A list of all Respondents who provided comment is included in **Annex D**.

KEY ISSUES RAISED IN RESPONSE TO QUESTIONS

Q1 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?

Most respondents agreed that the draft FRMPs focused on the most significant flood risk areas.

2 respondents commented that the methodology appeared to be based on past evidence and that this was likely to be unreliable as predicted climate changes and future development in known risk areas would have the potential to increase future flooding.

Response:

The Department's methodology for determining the flood risk areas is not solely 'based on past evidence'. Although flood history plays a part in the methodology, it is largely focused on the output from a range of predictive digital flood models which were produced for each of the flood sources in accordance with industry best practice. This approach is consistent with that taken by all other flood authorities in the UK and Ireland. These models take into account the predicted climate changes due to global warming and importantly, will be used to estimate the potential increased flood risk from proposed future development to ensure that planners have the information to prevent inappropriate developments that would be at risk of flooding or increase flood risk elsewhere.

One respondent emphasised the need for legislation to manage the risk of flooding from reservoirs.

Response:

The Department is aware of the importance of managing the risk of flooding from reservoirs. For this reason, it has brought forward primary legislation to

regulate reservoirs in Northern Ireland capable of holding 10,000m³ or more of water. This new legislation, the Reservoirs Act (Northern Ireland) 2015 aims to ensure that those responsible for managing and operating regulated reservoirs, do so to industry standards and thereby reduce the likelihood of a failure that would result in flooding due to an uncontrolled release of water. The legislation is being commenced in two phases and it is likely that the first phase will come into force in summer 2016.

Q2 - Do you understand and agree with the objectives as described in the draft plan?

The majority of respondents understood and agreed with the objectives in the FRMPs.

One respondent pointed out that it wasn't clear if the stated objectives in relation to the reduction of economic losses included the cost of flood damage to infrastructure.

Response:

The Department accepts that the wording of the stated objectives could be clearer and confirms that the economic objectives in the FRMPs include a reduction in the cost of flood damage to infrastructure. The FRMP objectives will be reviewed and revised as necessary.

One respondent advocated the inclusion of an objective to reduce flood risk to agricultural land.

The purpose of the FRMPs is to establish appropriate objectives for the management of flood risk within areas of potential significant flood risk. Within Northern Ireland the Department has determined, based mainly on an economic assessment of potential future flood damages, that there are 20 Significant Flood Risk Areas (SFRAs). These areas are all urban in nature due to the fact that the cost of flood damage within a developed area is significantly higher than an

equivalent agricultural area. Therefore the objectives of the plan must focus on the mitigation of the flood risk within the 20 named SFRA.

One respondent suggested that casual readers of the FRMPs would be likely to associate the objective 'to reduce the risk to health and well-being' in purely physical terms and therefore it may be useful to emphasise that this also includes mental health, as the affects of flooding on people's mental health are often severe.

Response:

The Department accepts that the distress suffered by people impacted by flooding can have a profound effect on their health and well-being which can include mental health problems. It is aware of this issue through its involvement with Community Resilience pilot schemes and also from current research work into emotional and psychological wellbeing that is being undertaken by organisations such as the Red Cross. The outcome of this research is expected during this particular FRMP period and could inform the development of future approaches and specific measures to improve community resilience in this area. Whilst accepting the seriousness of mental health issues, the Department is satisfied that the objective 'to reduce the risk to health and well-being' encompasses mental health. This will be clarified in the final FRMPs.

One respondent suggested that particular approaches to flood risk such as Natural Flood Risk Management, Blue Green Infrastructure and Sustainable Drainage Systems (SuDS) should be explicitly mentioned in the objectives.

Response:

The Department is supportive of the appropriate use of these approaches to reduce flood risk within the SFRAs and its position in relation to each of these is detailed elsewhere in this document. However, these approaches are not of themselves objectives. They are however, included in the broad suite of measures that can be applied at the individual catchment scale to contribute to the stated flood risk objectives of the FRMPs. Therefore, the Department does

not consider that it is necessary or appropriate to include a reference to these approaches in the objectives.

One respondent perceived that the draft FRMPs did not fully comply with Floods Directive Regulations as they omitted to 'take account of' specific considerations which are listed in Clause 12 such as: soil and water management, conservation of nature, navigation and port infrastructure, and development & land-use planning.

Response:

The Floods Directive Regulations state that the Department shall, in '*setting objectives and identifying measures*' for the FRMPs, '*take account of, so far as relevant*' the matters to which the respondent refers. There has been engagement with the ports and harbours authorities throughout the process to prepare the FRMPs and the flood risk to Belfast Harbour will be taken into account in the development of the measures under consideration in the ongoing Belfast Tidal Study. Development and land use planning is effectively addressed within PPS15 and Rivers Agency ensures that councils' planning departments are provided with the best possible information and advice in relation to the potential impacts of proposed development on flood risk. Soil management issues are currently under consideration by the NI Agricultural Land Use Expert Working Group, which is currently working on the development of a sustainable agricultural land management strategy.

Therefore, the Department is satisfied that it has taken a detailed account of these considerations were it is justified and the others to the extent that they are relevant to the overall aims of the FRMPs.

Q3 - Do you agree that there is the right balance between the social, economic and environmental objectives?

There were differing opinions offered by respondents on the balance of the objectives in the draft FRMPs. The majority considered the balance was right but a number did not.

Of those who considered the balance was not right:-

Three respondents, all of which were representing local councils, were very supportive of the useful work done through the Regional Community Resilience Group's (RCRG) pilot project, to engage with flood prone communities to create greater awareness of flood risk and involve residents in the development of flood emergency plans and self help initiatives. However, they highlighted the fact that that RCRG pilot project had focused almost exclusively on homeowners and that more work was required to engage with the owners of retail and commercial properties.

Response:

The Department accepts that the RCRG's pilot project has largely focused on engaging with those living in flood prone residential communities. The Department believes that due to the potentially traumatic impacts on people when their homes have been flooded, it was appropriate for the early work of the RCRG to focus on residential areas. Generally, the owners of commercial don't live in the premises, are usually insured against flooding and have a greater capacity to recover.

However, the draft FRMPs contains details of 20 new pilot areas that have been identified for community resilience. One of the proposed new areas for community engagement, Omagh town, contains a significant cluster of commercial and retail premises. It is anticipated that lessons learnt through this particular community resilience project will assist with the development of mechanisms to better inform and involve the owners of retail and commercial properties on flood resilience.

One respondent considered that the absence of a specific section on the potential impacts on freshwater fisheries appears to be an omission from the FRMPs.

Response:

Freshwater fisheries are included in the bio-diversity assessment of flora and fauna at a strategic level within the Strategic Environmental Assessment. Given their strategic nature, the FRMPs do not address the environmental effects of potential site specific structural measures. It should be noted that all planned flood alleviation works are subject to the Drainage (Environmental Impact Assessment) Regulations (Northern Ireland) 2006. This legislation requires the Department to consider the effects of any of its proposed works on the environment, including fisheries. The Department fully complies with these regulations which ensure that all stakeholders, including the general public, have access to information on all proposed schemes and are invited to forward their views on their likely environmental effects. On the basis of the representations received, the Department will determine if a scheme shall proceed in whole or in part, with whatever measures are necessary to avoid, reduce and, if possible, remedy significant environmental effects.

Three respondents felt that the focus of the FRMPs should be on the environment as they believe that the successful management of the water environment would secure the desired economic and social benefits.

Response:

The Department acknowledges the importance of protecting and enhancing the environment, but it would not be appropriate to totally focus the FRMPs on the delivery of environmental objectives. It believes that a balanced approach that also takes specific account of other important objectives in relation to human health and economic activity, is more likely to deliver effective flood risk management, particularly in heavily urbanised catchments.

One respondent cautioned against giving disproportionate weight to environmental objectives if it meant that increased habitat protection would inhibit the dredging of rivers to protect farmland in the future.

Response:

The Department's Rivers Agency undertakes regular maintenance works on designated watercourses. This work is undertaken using environmentally sensitive, river engineering techniques and is necessary to alleviate flooding and to maintain land drainage. The FRMPs do not seek to prevent or restrict this work in the future and Rivers Agency will continue to have due regard for the river environment when undertaking such work.

One respondent emphasised that the adverse effects of flooding on mental health was a significant social issue that should be addressed in the FRMPs.

Response:

The Department notes the concerns expressed regarding the impacts on the mental health of those affected by flooding. It is aware of these issues through its involvement with the Regional Community Resilience Group's Pilot Project and from current research work into emotional and psychological wellbeing that is being undertaken by organisations such as the Red Cross. The outcome of this research is expected during this particular FRMP period and it may inform the development of future approaches to enhance community resilience in this area.

Q4 - Do you agree with the proposed measures identified for each of the significant flood risk areas?

The majority of respondents agreed that the measures were appropriate.

Three respondents were supportive of the work of the recent Regional Community Resilience Group Pilot Project that was established in 2013 to co-ordinate the self-help activities for a number of communities at risk of flooding. They wished to see this work continue.

Response:

The valuable information and experience obtained through the Regional Community Resilience Group's Pilot Project is recognised in the FRMPs and the Department is committed to extending this approach to other flood prone communities as part of the Department's flood warning and informing activities as resources permit.

Of the small number of respondents that did not agree, one considered that action should be taken to ensure that the lands adjacent to the Upper Bann and Ballybay Rivers are adequately drained.

Response:

The Department will ensure that all designated watercourses within the Craigavon area (including the Upper Bann River and Ballybay River) and elsewhere in Northern Ireland will continue to be maintained to a suitable standard as resources permit.

One respondent noted that since publication of the draft FRMPs there have been significant reforms in local government that need to be reflected in the final plans. They were particularly concerned to ensure that the role of Councils in the new two-tier planning system was highlighted in the FRMPs and that there were effective arrangements in place to provide Councils with such support and advice as is necessary to take account of flood risk in their planning decisions.

Response:

The FRMPs will be updated to reflect the new two-tier planning system in which Councils are responsible for the majority of planning decisions and planning enforcement. Councils are also responsible for the preparation of Local Development Plans. These Plans must be produced in line with the Department of Environment's Strategic Planning Policy Statement (SPPS), which reflects in a strategic way the provisions of the recently revised PPS15 – Planning and Flood Risk. The SPPS addresses sustainable development and how planning and flood risk are taken into account within the planning system. It will be important that Councils ensure that they have processes and effective arrangements in place to produce Local Development Plans that give appropriate consideration to flood risk.

The Department's Rivers Agency has a long history of working with Planning NI to raise awareness of, and provide advice on, flood risk. As a result of the new planning system, Rivers Agency is working with all Council planning departments to ensure that they have the necessary skills and information to take proper account of flood risk in the execution of their development planning responsibilities.

One respondent indicated that, although much improved, joint working between agencies still appeared slightly disjointed, particularly the links to the Sustainable Infrastructure Programme Board and the Strategic Investment Infrastructure Programme. They suggested that the links, along with the integrated processes, should be more explicit in the final FRMPs. They considered that it is unclear how the agenda of the Flood Investment and Planning Group integrates with local development and regeneration agendas or with the other strategic groups.

Response:

The Department considers that, subsequent to the publication of the Performance and Efficiency Delivery Unit's (PEDU) Report on its review of the response of government agencies to the severe incidence of flooding on 27th

and 28th of June 2012, there has been a marked improvement in the delivery of a more coordinated response to flooding. It is accepted that there is still room to improve multi-agency coordination and cooperation to secure a more proactive strategic approach to investment in work programmes. However, a substantive review of these arrangements is not likely to take place until 2016, when all of the key drainage infrastructure providers (NI Water, Transport NI and Rivers Agency) and the Strategic Investment Unit will be brought together under the remit of a new Department for Infrastructure.

In relation to the role of the newly formed Strategic Drainage Infrastructure Programme Board (SDIPB), its objective is to develop a strategic drainage plan for Belfast that will include a programme of works to reduce untreated overflows from the city's combined sewerage system to improve the water quality of Belfast Lough and reduce flooding. The strategic development plan, which could take up to three years to develop, will contain a mixture of traditional and SuDS solutions. Early estimates are the necessary works may require an investment of up to £750m over a ten year period. It is presently unclear if SDIPB will have an overseeing or coordination role for all future investment in Belfast's drainage infrastructure. The final FRMPs will reflect the known position regarding the role of SDIPB.

The Flood Investment and Planning Group (FIPG) is an inter-departmental group with membership from Transport NI, NI Water and Rivers Agency. The role of FIPG is to ensure that there is a coordinated approach to the investigation and resolution of existing flooding problems when it is unclear which of the authorities is responsible or when more than one authority has a responsibility and it is not obvious which should take the lead. The Department accepts that the limits of FIPG's remit are not fully apparent from the description in the draft FRMPs and this will be revised in the final FRMPs. It was never intended that FIPG would integrate with local development and regeneration agendas as it was established to deal specifically with known flooding hotspots, most of which are fairly limited in scale.

The Department will review and, where necessary, revise the FRMPs to ensure that the linkages between the various flood management groups are clearly described.

Q5 - What measures do you think should be given the highest priority to manage the flood risk in your area?

The most notable of the respondents' key priorities have been grouped under the Floods Directive's mitigation approaches of Prevention, Preparedness, and Protection and are listed below.

Prevention

- Ensuring effective application of PPS15 following local government reform;
- Opposition to development within flood plains;
- Compulsory use of SuDS and the attenuation of flows from all future developments.

Response:

In regard to development within flood plains, the Department considers that the existing Planning Policy Statement 15 (PPS15), – Planning and Flood Risk is an effective mechanism for the prevention of future development that may be at risk from flooding or that may increase the risk of flooding elsewhere. The Department recognises that the recent introduction of the two-tier planning system has put Councils at the centre of local decision making in respect of planning but the fundamental principle of protecting flood plains and avoiding development in areas that increase flood risk has not changed. Rivers Agency will work closely with all Council planning departments to ensure that they have the necessary skills and information to take proper account of flood risk in execution of their development planning responsibilities.

NI Environment Agency's (NIEA) Strategy for the Promotion of the use of SuDS within Northern Ireland was published in 2011. The aim of this strategy is to establish SuDS as the preferred approach for managing the storm water discharges which arise from the development of land. Although many of the recommendations within this strategy have been adopted, some work remains to be done to establish the full realisation of SuDS as a viable and routinely adopted solution to storm water management. Latterly, the Government's Long Term Water Strategy (LTWS) published in 2015, reaffirmed its commitment to SuDS as the preferred option for managing surface water flooding and outlines a series of measures necessary to overcome the remaining outstanding issues to be addressed. The Department will revise the FRMPs to clearly describe the current position with SuDS and outline the ongoing work to promote and support their wider use.

Preparedness

- Appointment of one lead Agency or co-ordinating body to deal with flood risk management, regardless of the source;
- Awareness raising, education, improving community resilience through multi-agency engagement with local communities;
- Address adverse mental health effects of flooding.

Response:

The Department is the Lead Government Department (LGD) for the coordination of the response to flood emergencies in Northern Ireland. The implementation of the functions of the LGD role is effectively undertaken by the Department's Rivers Agency due to its expert knowledge in this area. Although the Department's LGD role does not cover all of the defined Levels of Emergency, there is a clear pathway for the transfer of responsibility from Rivers Agency to other organisations as the severity level of emergency escalates.

Each of the authorities that are responsible for drainage/sewerage infrastructure (i.e. Rivers Agency, Transport NI and NI Water) also have a

responsibility to manage the flood risk related to that infrastructure. It does however need to be recognised that it is often difficult to establish ownership of a flooding problem and in some cases this has caused delay in progressing solutions. Therefore, in recognition of this difficulty, the inter-departmental Flood Investment and Planning Group (FIPG) was established. FIPG has no involvement in flood emergency response, its remit is to ensure that there is a coordinated approach to the investigation and resolution of existing flooding problems when it is unclear which of the authorities is responsible or when more than one authority has a responsibility and it is not obvious which should take the lead. For further information on FIPG, see response at Q4. It should be noted that all of the drainage providers will form part of the new Department for Infrastructure in the spring of 2016. It is anticipated that this will create opportunities for further improved communication, coordination and effectiveness on cross-cutting flood risk management issues, particularly in those requiring joint funded solutions to address flooding problems from multiple sources.

The Department agrees that creating awareness of flooding is a key priority when it comes to managing flood risk and it has taken significant steps to ensure that those living and working in areas of known flood risk can access the latest, most up to date, flood hazard information on Flood Maps NI. In addition, appropriate flood warning and informing systems for communities located within flood prone areas continue to be developed by the Department and it is currently looking at options to make the information it holds on river levels available to the public through the internet.

The Department recognises the need to engage proactively on a multi-agency basis with those communities most significantly at risk of flooding and has supported the Regional Community Resilience Group's Pilot Project, to establish 10 Community Resilience Groups and involved local people in the preparation of flood emergency plans for their area. This has been very successful and therefore, within this FRMP period, the Department is

committed to extend the opportunity to establish a further 20 Community Resilience Groups within other flood prone areas.

The Department recognises the potential adverse mental health effects from flooding and refers to the last of its responses to Question 3 (above).

Protection

- Upgrading and priority maintenance of existing drainage/sewerage systems.
- Continued identification and delivery of publicly funded flood alleviation schemes.
- Reduce over-reliance on hard engineering solutions through the greater use of alternative flood mitigation measures such as SuDS, natural flood risk management and making space for water through the use of 'green' spaces.
- Assistance for homeowners to install Individual Property Protection (IPP) measures

Response:

Each of the agencies with a responsibility for drainage and sewerage infrastructure has a prioritised programme of works that takes appropriate account of the flood risk from their assets. In addition, where there is no clear 'owner' of a flooding problem, particularly from surface water, government is committed to the development of a prioritised programme of integrated localised drainage schemes that will taken forward by the FIPG. In addition, the drainage agencies have representatives that meet on a quarterly basis with others, including the Council EPCOs, on the Flooding & Severe Weather Working Groups that have been established under the Sub Regional Emergency Preparedness Groups. Through these groups, historical flood data is used to identify flooding hotspots which are known to flood on a repeated basis. Having identified these hotspots, the authority responsible

commits to mitigate the risk through appropriate affordable measures such as infrastructure improvements and/or increased maintenance of assets.

The Floods Directive has served to focus attention on those communities which are likely to be affected by significant flooding in the future. Where cost beneficial and affordable, the Department will continue to protect flood prone communities through the use of publicly funded flood alleviation solutions such as drainage improvement works and flood defences. All economically viable works are prioritised and undertaken as resources permit.

The Response to Question 2 covers in part, alternative approaches to flood management which are designed to store and release floodwater in a controlled manner to reduce the frequency and magnitude of flooding downstream. The Department is supportive of flood alleviation through appropriate attenuation and the use of green spaces and pondage areas for flood alleviation purposes. The FRMPs will include the current positions on Natural Flood Management and Sustainable Drainage Systems.

In relation to IPP, the Department plans to introduce the Homeowners Flood Protection Grant Scheme by March 2016. Through this Scheme, Government will provide homeowners that are most at risk from flooding, with technical and financial support necessary to make their homes more resistant to flooding.

Q6 - 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?

Community preparedness, resilience, engagement and involvement were all strong features of many responses. A number of respondents from within the flood emergency response sector, reinforced the importance of public awareness/education of flooding and the inclusion of community representatives in multi-agency meetings on flooding issues. Responses considered that community

resilience projects should be properly prioritised according to need. Two respondents supported close liaison between multi-agency partners to reduce flooding and to prepare for major incidents. One 'blue-light' respondent suggested that joint training exercises to respond to flood emergency situations were essential.

Response:

As mentioned in the response to Question 5, the Department agrees that raising flood awareness is a key priority when it comes to managing flood risk. People living in flood prone areas may not be aware that their property lies within a flood plain. To improve awareness of flood risks, the public can access the most up to date flood mapping information through Flood Maps NI. It is also recognises that agencies and government departments involved in flood risk management should and do make a reasonable effort to inform people of this risk through for example; Local Flood Forums, local council meetings and community resilience meetings.

There have been improved and productive joint working relationships in recent years between the drainage agencies, local councils, 'blue-light' services, charitable organisations and others involved in the provision of community support. The work of the Regional Community Resilience Group in piloting community resilience initiatives in a number of flood prone areas has been very successful. The subsequent Report from this Group will contribute significantly towards establishing best practice for future community engagement in this area. Within the FRMP period, the Department has committed to extend this community resilience initiative and approaches will be made to a further 20 flood prone communities as resources permit.

The Department recognises the important role that elected representatives play in both the planning and response phases for flood emergencies and the important contribution they made through the Local Flood Forums in shaping the FRMPs. It is committed to ensuring that there will continue to be opportunities for elected representatives to put forward the concerns and views of local communities within the flood risk management planning process.

Training and exercising is recognised by the Department as an important part of emergency planning for flooding. The Department will continue to plan, test and review its emergency response to flooding and to work closely with other responding organisations on the development of their resilience plans.

One respondent mentioned the impact of flooding of farmland and the need for catchment-wide management partnerships.

Response:

The response to Question 2 includes comment on flooding to agricultural land. The Department is currently taking the lead in a trial catchment management plan for the Moyola River catchment through the inter-agency Catchment Oversight Group. This pilot study is assessing the use of GIS to map information from a range of stakeholders, with the aim of identifying sites and projects where works may have benefits under a number of headings.

One respondent stated that the FRMPs should contain more detail on SuDS, green infrastructure and the reform of the planning arrangements and how this will be managed.

Response:

Previous responses to comments elsewhere have covered the Department's recognition that it must assist appropriately in the transition of planning arrangements from government department to councils. As mentioned, the Department will include information on Sustainable Drainage Systems in the FRMPs.

Q7 - Are there things you think should be done to improve the co-ordination of river basin and flood risk management planning?

A number of respondents indicated the importance of continued planning and co-ordination on a multi-agency basis, most notably through the Emergency Preparedness Groups (EPGs) supported by local government EPCOs. They also felt that there may be justification for the consolidation of the emergency planning structures and general consultation arrangements.

Response:

The Department notes and agrees with the need to support and build on the co-ordinated multi-agency approach to emergency planning that has been evident through the EPGs. The Department recognises that reduced resources will require more streamlined approaches and possible integration and rationalisation of groups. Therefore, the Department will consider reviewing the future arrangements for consultation and engagement following the conclusion of the first FRMP preparation cycle in December 2015. There is every prospect that the consultation network could be rationalised as there is now an established process to follow for the second FRMP preparation cycle.

Respondents from within the emergency planning community suggested that it would benefit from the provision of additional flood mapping that overlaps the national boundaries for cross-border river basins and map based data to highlight the location of vulnerable people.

Response:

The Department works closely with the Office of Public Works (OPW) which has developed detailed flood maps for the Republic of Ireland. If the Cross Border Emergency Management Group decides that there is clear need for a map sharing platform that marries the detailed flood maps along both sides of the 'border necklace', this is something that the Department will consider in cooperation with OPW.

The Department understands that Spatial NI is leading on the sharing of information regarding vulnerable people to those involved in planning for emergencies, through a Vulnerable Persons Protocol.

One respondent recommended that there should be a lead agency for managing flood risk and reinforced the importance of the continued development of good working relationships between the various emergency responders.

Response:

The responses to Questions 4, 5 & 6 address these important issues.

One respondent suggested the introduction of a Flood Incident Helpline that enables the victims of flooding to seek assistance at the earliest signs of rising water levels.

Response:

NI Direct is presently developing a new “Report a Flood” service which will combine with the existing Flood Incident Line, which is also being improved, to deliver an enhanced flood reporting service for Northern Ireland. This will increase the methods available to the public for reporting floods by adding web-based and mobile reporting capabilities. However, this will not extend the system’s capability to include an advice/incident helpline service.

One respondent highlighted that FRMPs should be revised to reflect the new local governance and development planning arrangements and the need to ensure that effective communication and delivery of civil contingencies is secured throughout this transition.

Response:

The response to Question 4 addresses some of the governance issues arising from changes in local and central government. It will take time for necessary changes to embed into working arrangements and practices.

One respondent suggested the prevention of further development within a 100m wide zone extending beyond the existing limits of the known flood plains and the introduction of a statutory 'Flood Risk Report' for all properties that are being sold.

Response:

As stated previously in the response to Question 5, the Department considers that PPS15 – Planning and Flood Risk, is an effective mechanism for the prevention of future development that may be at risk from flooding or that may increase the risk of flooding elsewhere. To extend the protection beyond the limits of known flood plains could stifle the regeneration of towns and cities.

With regard to the concept of a Flood Risk Report for properties, the Department understands that it is normal practice for solicitors involved in property conveyance to provide their clients with information on risks that could potentially affect their property purchases, including flood risk. A general assessment of flood risk to individual properties can be easily obtained through the use of the flood maps which are available to the general public, including solicitors, through the Flood Maps NI. Therefore, the Department does not consider that the introduction of a vendors' Flood Risk Report is necessary.

Questions on the Environmental Report

Q 8 - Do you agree with the conclusions of the environmental assessment?

The majority of respondents agreed with Department's conclusions in the Strategic Environmental Assessment (SEA). One of these respondents commented that they were encouraged to find that there is the potential for multi-directive benefits through the use of synergistic works, on a partnership basis.

Two respondents did not agree with the conclusions.

One respondent commented that there could justifiably have been reference in the FRMPs to 'non-priority' species of fish in rivers (i.e. those not specifically listed by EU or EU driven legislation), the need for river continuity to join up in-river habitats and the potential for added value when works to alleviate flooding are being considered.

Response:

The SEA which forms a part of these FRMPs is a high level strategic document and as such, does not deal with measures at a scheme or site-specific level. However, all planned flood alleviation works are subject to the Drainage (Environmental Impact Assessment) Regulations (Northern Ireland) 2006. This legislation requires the Agency to consider the effects on the environment of all proposed works. The Department fully complies with the requirements of these regulations which ensure that all proposed schemes are widely publicised, that all stakeholders, including the general public, are given an opportunity to forward their opinion on a scheme and its likely effects. On the basis of representation through the consultation process, the Department will determine if a scheme shall proceed in whole or in part, with whatever measures are necessary to 'avoid, reduce and if possible, remedy significant adverse effects'.

In addition, the Department, in the design of its proposed flood alleviation schemes, actively seeks to enhance the environment and works in cooperation with colleagues in DCAL Inland Fisheries and Loughs Agency to identify opportunities to protect and enhance fisheries.

The second respondent did not believe that sufficient thought had been given to the flora, fauna and natural environment and cited the canalisation of rivers and clearing of bankside vegetation as measures that are environmentally damaging and provide no benefits in terms of flood risk reduction.

Response:

All capital works proposed by the Department are subject to an EIA procedure as set out in the Drainage (Environmental Impact Assessment) Regulations (NI) 2006. This requires a robust assessment of the potential environmental impacts, consultation and appropriate mitigatory or enhancement works in line with local, national or EC environmental strategies and directives.

Watercourse maintenance works, which are undertaken by the Department for the purposes of land drainage and flood alleviation, are subject to assessment under the same legislation and there is associated ongoing consultation with statutory fisheries groups and the NIEA.

Q9 - Are there any further significant environmental effects of the draft plan which you think should be considered?

One respondent commented that Lough Neagh is dependent on the water quality of its feeder systems and that the quality of Lough Neagh which is a drinking water source is being degraded by pollution arising from outdated sewerage systems that are being discharged to the Lough via watercourses during floods.

Response:

Pollution of the Lough Neagh Special Protection Area (SPA) is specifically addressed through the Neagh Bann International River Basin District River Basin Management Plan. The Programme of Measures to reduce, diffuse and point source pollution from sewerage and industry is available via the NI Environment Agency's website via the following link <http://www.doeni.gov.uk/niea/diffuse-sewage.pdf>

Point source discharges are regulated through the process of licensing consents under the Water Order (Northern Ireland) 1999, and all consents are currently being reviewed to ensure that the consent conditions are compliant with the objectives of the Water Framework Directive.

Waste water treatment works and sewerage networks are prioritised for investment based on their performance under the Northern Ireland Water's Capital Investment Programme. Northern Ireland Water plans to invest £990 million over its next investment period 2015 to 2021.

Q10 - Are there further mitigations or opportunities that should be considered for the plan?

Four Respondents provided comments as follows:-

The completed FRMP should be subjected to validation so that elements of the FRMP can be regularly tested for currency and effectiveness.

Response:

Validation of the FRMPs and the monitoring of progress in implementing them will be undertaken by the cross-departmental Floods Strategy Steering Group. The EU Floods Directive requires that the FRMPs are updated on a 6 yearly cycle and that updates will include an assessment of progress achieved in relation to the objectives of the previous FRMPs. The updating of the flood maps is an ongoing process that is undertaken as and when new information

becomes available. Where changes to the flood maps are significant there will be a reassessment of the level of risk to communities which may necessitate a review of the planned mitigation measures.

One respondent considered that the Neagh Bann Flood Forum met too infrequently and lacked focus in setting targets and achieving tangible goals.

Response:

The Department acknowledges the concern expressed in relation to the Local Flood Forum meetings. Subsequent to the publication of the final FRMPs in December 2015, the Department aims to hold another round of Local Flood Forum meetings in early 2016. There will be an opportunity at these next meetings for members to discuss and agree changes to the Forums that may deliver more effective arrangements for the exchange of ideas and views on flood risk management.

One respondent suggested that due to the large size of the FRMPs it may be useful to include a Flood Risk Matrix as an Annex which contains a summary of the key flood risk information and planned mitigation measures for each of the twenty Significant Flood Risk Areas.

Response:

The Department agrees and will include a summary table within each of the FRMPs that contains the key flood risk information and mitigation measures for the SFRAs within each of River Basin Districts.

KEY ISSUES RAISED IN LETTER BASED RESPONSES

B1. Consumer Council

The Consumer Council with the assistance of the Red Cross reviewed the work of the RCRG pilot and recommended that it should continue. It is important that the communities set to benefit from the plans in the draft FRMPs are informed of when the projects and benefits will be delivered.

Response:

Following the success of the RCRG pilot project there is commitment over the FRMP period, to extend this community resilience initiative to a further 20 communities. The Department's engagement with respective communities is dependent not only on its own resources, but also those of fellow RCRG member organisations. Communities will be informed of proposed engagement once resources and timescales are known but this detail may not be available when the final FRMPs are published in December 2015.

Consumer Council research shows that consumers want investment to provide sustainable flooding solutions and improved assistance for those affected by flooding but recognise that affordability will always be a central factor. The Consumer Council therefore supports the prioritised approach set out in the draft FRMPs.

Response:

The Department welcomes the Consumers Council's recognition that affordability is an issue and that it supports the prioritised approach set out in the draft FRMPs.

B2. Department of Environment (DOE), Planning Policy Division

The respondent drew attention to the fact that on 1 April 2015 (*subsequent to the commencement of the FRMP consultation exercise*) the vast majority of planning functions transferred from the DOE to 11 new councils. Under this reformed two-tier planning system, Councils are now responsible for the majority of planning decisions, planning enforcement and the preparation of Local Development Plans for their areas. They advised that DOE is bringing forward a new Strategic Planning Policy Statement (SPPS) which will address sustainable development and how planning and flood risk are taken into account within the planning system. The SPPS will consolidate updates and reflect in a strategic way the existing provisions of Revised PPS15. Work on the final version of the SPPS has recently concluded and is expected to be published in the near future following Executive Committee consideration.

Response:

The Department will revise the FRMPs to take account of the DOE's SPPS which will set out how flood risk will be taken into account within the new two-tier planning system that came into effect on 1 April 2015.

B3. Department of Health, Social Services & Public Safety

The respondent indicated that they found the draft FRMPs to be very comprehensive and informative and that they struck a good balance between the social, economic and environmental objectives.

Response:

The Department notes and welcomes the DHSSPS's positive comments.

B4. Natural Living Assets

The respondent believes that the environmental impact assessment required further work and suggested that it required a process for determining the impact of flood

prevention schemes on the environment and salmonid habitats in particular. They also felt that it should consider the potential impacts on river hydro-geomorphology within salmonid rivers.

They suggested that there should be stronger representation from inland fisheries utilising scientific input from, for example, Agricultural and Food Bioscience Institute and other fishery interests.

They also indicated a need for continuous monitoring of new and evolving evidence for hydro-geomorphological impact assessments.

Response:

The FRMPs are strategic documents and as a consequence the associated SEA as part of these Plans is undertaken at a strategic level. It would not be possible at this stage to assess the impacts of the many potential future flood prevention schemes that have been highlighted within the FRMPs.

However, all flood alleviation works proposed by the Department are subject to an EIA procedure as set out in the Drainage (Environmental Impact Assessment) Regulations (NI) 2006. This requires a robust assessment of the potential environmental impacts of proposed works in line with local, national or EC environmental strategies and directives. The Regulations ensure that all stakeholders, including the general public, are consulted and have the opportunity to influence the decision to proceed with the works in whole or in part, with whatever measures are necessary to avoid or mitigate the environmental effects on the environment, including fisheries. The Department is also satisfied that fisheries interests are robustly represented within government through DCAL Inland Fisheries and Loughs Agency.

With respect to hydro-geomorphology the Department employs the River Hydro-morphological Assessment Technique (RHAT) analysis for pre and post scheme monitoring for flood alleviation and restoration schemes.

The respondent felt that the goals of the FRMPs are well communicated and defined in the context of flood prevention, but less holistically in the context of wider environmental impacts such as a total catchment management approach.

Response:

The Department recognises the importance of a catchment based approach and is currently taking the lead in a trial catchment management plan for the Moyola River catchment through the inter-agency Catchment Oversight Group. This pilot study is assessing the use of GIS to map information from a range of stakeholders, with the aim of identifying sites and projects where works may have benefits under a number of headings.

B5. Northern Ireland Housing Executive (in addition to questionnaire)

The NIHE expressed broad support for the FRMPs and indicated their willingness to engage with all relevant agencies to alleviate the threat of flooding to their properties.

Response:

The Department notes and welcomes the NIHE's positive comments and support.

B6. Public Health Agency (PHA)

The PHA suggested that there is evidence to indicate that the main impact of flooding on human health is on the mental health of those directly affected and there was a need to include remedial measures to address this issue.

Response:

The Department accepts that the distress suffered by people affected by flooding can have a profound effect on their health and well-being and that

some can go on to develop mental health problems. It is aware of this issue through its involvement with the Regional Community Resilience Group's Pilot Project and also from current research work into emotional and psychological well-being that is being undertaken by organisations such as the Red Cross. The outcome of this research is expected during this particular FRMP period and could inform the development of future approaches and specific measures to improve community resilience in this area. The Department invites health professionals, including the Public Health Agency (PHA) and the Department of Health, Social Services and Public Safety (DHSSPS) to consider if a specific strategy to address this issue should be developed.

The respondent welcomed the commitment with the FRMPs to continued emergency planning and preparedness, exercising and inter-agency working prior to and during a flooding incident. They also welcomed the continued commitment to building local community capacity and indicated their willingness to remain engaged in these initiatives.

Response:

The Department notes and welcomes the PHA's positive comments and support in relation to the preparedness initiatives within the FRMPs.

B7. UK Independence Party

The respondent suggested that regular inspection and maintenance of drainage and flood protection infrastructure should be given the highest priority when managing flood risk.

Response:

The Department agrees that maintenance and inspections of drainage and flood defence infrastructure is a priority when managing flood risk. Transport NI, NI Water and Rivers Agency each have asset management plans that focus

maintenance on their respective drainage and flood defence infrastructure as necessary to deliver appropriate standards of service.

The respondent stated that government should provide grant aid to homeowners who want to take positive action to reduce the risk of flooding to their property.

Response:

The Department is proposing to introduce a Homeowner Flood Protection Grant scheme by March 2016. The Scheme will be directed at the owners of residential properties that are exposed to frequent flooding and which are unlikely to benefit from a community-level flood alleviation solution in the foreseeable future. The Scheme will provide qualifying homeowners with the technical support and financial assistance necessary to modify their homes to make them more resistant to floodwater.

B8. Ulster Angling Federation (UAF) and Loughmacrory & Murrins District Angling Club (L&MDAC)

The UAF and the L&MDAC provided a substantial and very comprehensive reply to the consultation that covers a broad range of issues. The Department's response in regard to the many comments raised in the replies is detailed in Annex B (commencing Page 137). The main issues that were raised by the respondents and the Department's response to these issues are follows:

In the view of the respondents the draft FRMPs do not comply with the requirements of the Directive because many of the proposed measures are stated in a *'generalised form'*.

Response:

The Department is satisfied that the draft FRMPs comply with both the requirements and spirit of the Directive. Whilst accepting that many of the mitigatory measures are 'generic', this is to be expected as most non-structural flood risk management practices will reduce the adverse impacts of flooding in all of the SFRAs. In relation to structural measures (i.e. engineering solutions) the Department has given a clear indication of the locations where such works are, or may be, justifiable. However, depending on resources it may take between 2 and 5 years to progress schemes identified as economically viable from the feasibility stage to the construction stage. This process is explained in detail in the FRMPs and is the reason that the Department cannot give firm commitments to undertake structural measures at specific locations within a certain timeframe.

Quoting directly from the FRMPs, the respondents noted that a '*key feature of the Directive*' was that FRMPs should '*promote the use of natural flood risk management measures*' (NFM). As the FRMPs do not explicitly commit to the use of NFM measures the respondents felt that they did not comply with the requirements of the Directive.

Response:

The Department accepts that the statement in the FRMPs in relation to NFM is misleading and does not reflect the actual requirements of the Directive. The Directive does not require that FRMPs should promote NFM, rather it states that they shall address all aspects of flood risk management and 'may include the promotion of sustainable land practices'. The Department will amend the FRMPs to ensure that this confusion is removed. However, as NFM is an issue that has been raised by many of the respondents, the Department undertakes to revise the FRMPs to include details of its position in regard to the use of this potential flood mitigation measure.

The respondents felt that there was an unjustifiable limitation of the environmental considerations within the FRMPs as there was a focus on 'designated' and 'priority' areas/species/habitats. This caused them concern that where flood alleviation schemes are undertaken in areas that do not have an associated designated/priority status the *'environmental protection will be very limited or non-existent'*.

Response:

The Department is satisfied that, regardless of their location, the environmental impacts of all flood alleviation schemes are taken into consideration. All planned works are subject to the Drainage (Environmental Impact Assessment) Regulations (Northern Ireland) 2006. The Department fully complies with the requirements of this legislation which ensures that all proposed schemes are widely publicised and that all stakeholders, including the UAF and L&MDAC, are given the opportunity to forward their opinions on the proposed scheme and its likely environmental effects. On the basis of the representations received through the consultation arrangements, the Department determines whether to proceed with schemes in whole, or in part, with whatever mitigation measures are necessary to avoid, reduce or remedy significant adverse environmental effects.

The respondents noted that the FRMPs refer to a feasibility study which identified a number of locations in the Glengormley and Mallusk areas that are at risk of flooding from designated and un-designated watercourses. They raised concerns this potential future scheme is being developed without any real environmental input, public participation, or transparency.

Response:

The flooding problem in question is complex and has required a detailed feasibility to investigate the cause of the flooding and identify a range of potential solutions. When it is established a scheme is likely to be viable, the various options and their environmental impacts, will be considered and assessed under the Drainage (Environmental Assessment) Regulations

(Northern Ireland) 2006. Should there be potential significant environmental impacts, proposals may have to go through a full Environment Impact Assessment and an environmental statement produced. All schemes arising from the Department's feasibility studies are subject to the scrutiny of the Department's statutory environmental consultees, approval by the Drainage Council for Northern Ireland, and are open to public consultation under both the Drainage (Northern Ireland) Order 1973 and the Drainage Regulations for a required 28 days.

The respondents suggested that high-level flood risk management groups such as the Flood Strategy Steering Group (FSSG) and the Flood Investment and Planning Group (FIPG) would benefit from fishery input through involvement with, for example, local fishery interests, NGOs or government fishery bodies. This, in their opinion, would ensure that there was appropriate consideration of environmental (fishery) interests at an early stage in the development of flood alleviation schemes.

The Department considers that these flood risk management groups have no role to play in the actual development of specific flood alleviation schemes because they operate at a strategic level. FSSG has an oversight role only in relation to the governance arrangements for emergency planning and response. FIPG's role is to ensure that there is a coordinated approach to the investigation of flooding problems in the circumstances that it is unclear which of the drainage authorities should take the lead, which can occur when there are multiple sources of flooding. Therefore, it would serve no useful purpose for these groups to engage directly with stakeholders with a fisheries interest. However, the Department is satisfied that the interests of fisheries are taken into account in all of its flood alleviation schemes through compliance with the Drainage (Environmental Impact Assessment) Regulations (Northern Ireland) 2006 – see previous response for details.

The respondents consider that there is a lack of coordination between the FRMPs and PPS15 – Planning and Flood Risk which in regard to spatial planning gives

support to the retention and restoration of natural flood plains and the promotion of SuDS.

Response

The Department is committed to sustainable development and does not accept that there is a lack of coordination between the FRMPs and PPS15. PPS15 is heavily referenced throughout the documents and should be viewed as an important mitigatory measure in itself. However, the Department does accept that the draft FRMPs do not contain sufficient detail in regard to SuDS. Therefore, the Department will revise the FRMPs to describe the current position with SuDS and outline the ongoing work to promote and support their wider use.

The respondents indicate that they believe nothing to have changed in regard to land use planning and that permission to '*develop up to the rivers edge*' is still being given and that this will result in the need for the construction of more publicly funded flood defences in the future.

Response:

The Department does not accept that its policies allow inappropriate development to take place 'up to the rivers edge'. The introduction of PPS15 - Planning and Flood Risk in 2006, has been effective in preventing the construction of inappropriate developments in known flood risk areas. Therefore, PPS15 is a key element of the FRMPs and its importance is highlighted throughout the documents.

The respondents noted that the FRMPs acknowledge the potential adverse impacts of culverts on fisheries and indicate that these can be mitigated by ensuring that there is 'Adherence to PPGs and best practice regarding building materials and working practices around watercourses'. However, the respondents are of the

opinion that *'in the real world it is a continuous struggle to avoid poor practice in the design and building of culverts'* and that greater commitment is required by Rivers Agency to prevent bad practice.

Response:

The Department recognises that the culverting of watercourses may have a negative impact on the ecological integrity, biodiversity and impacts on the passage of fish and is committed to ensure that watercourses are only culverted for the purposes of flood alleviation when there is no practical alternative. PPS15 states that all culverting requires planning permission and presumes that that *'it will only be acceptable in exceptional cases'*. For example, there should be no culverting of watercourses for new developments, except for short reaches to enable the construction of access roads.

Where the Department has no option but to culvert for the purposes of flood alleviation, it follows generic design guidance, which is approved by the statutory fisheries authorities and has been developed to ensure that sediment and fish continuity is maintained. All landowners who submit an application to the Department for permission to culvert watercourses that would require the installation of pipes that are 900mm diameter or greater, are required to contact Inland Fisheries/Loughs Agency directly to obtain their agreement before approval can be considered.

In relation to the Habitats Directive Article 6 Assessment, the respondents are not satisfied that the system in place for Natura 2000 (N2K) assessments that relate to the 'maintenance of channels' is functioning satisfactorily. They indicated that, in their opinion, there have been considerable ongoing problems in the past.

Response:

The Department carries out Habitat Regulatory Assessments (HRA) for any works, both maintenance and capital, which are within, adjacent to, or hydrologically connected to N2K sites. This is in addition to the assent process required for N2K sites. These assessments are submitted to NIEA.

B9. Northern Ireland Environment Agency – Water Management Unit (WMU)

WMU notes the importance of coordination with the River Basin Management Plans (RBMPs) as required under the Water Framework Directive (WFD). To this end, WMU notes the alignment of the spatial coverage of the FRMPs with Neagh Bann, North Western and North Eastern River Basin Districts.

Response:

In order to comply with legislative requirements, the River Basin Districts used for the Floods Directive (FD) are the same as those used for the Water Framework Directive.

WMU see the coordination of river basin and flood risk management planning as an important element in delivering both Directives, and the FRMPs are key to ensuring that this link is clearly demonstrated to the European Commission (EC).

Response:

The objectives and measures of the WFD will be taken into account in the flood risk management process and the Department will work closely with WMU to ensure the successful implementation of the WFD and FD in Northern Ireland.

WMU suggest that there is an opportunity for further Natural Water Retention Measures (NWRMs) and Sustainable Drainage Systems (SuDS) through catchment-scale multi-agency projects such as the Strategic Drainage Infrastructure

Programme for the Belfast area. NWRMs have been highlighted by the EC in its Communication on the Water Framework Directive and Floods Directive.

Response:

The Department recognises the need to manage flood risk through a multi-agency, catchment based approach that includes SuDS and NWRMs where appropriate. The recent Strategic Drainage Infrastructure Programme for Belfast will provide an opportunity to test these approaches and development the policy framework and technical capacity necessary for their wider use.

In addition WMU proposes that strategic land-use and development planning policies across Northern Ireland should further consider the multiple benefits that may be gained through holistic and integrated catchment management.

Response:

The Department is supportive of a holistic and integrated catchment management approach. The inter-agency Catchment Oversight Group which was established by NIEA to take forward measures that contribute to the implementation of the Water Framework Directive provides a sound basis for developing catchment based projects in future. This group aims to develop projects at the catchment and local level, through partnership working. In this way, both funding and benefits can be shared, providing better value for money, and developing the idea of adapting and delivering measures that have a number of drivers. Membership of the Catchment Oversight Group includes statutory fisheries groups, and DARD Countryside Management Division, thus providing excellent opportunities to develop partnership working and synergies in the long term.

5. Next Steps

The Department's Rivers Agency will be working alongside and engaging with stakeholders and other government departments to develop the key suggestions from the consultation and integrate them into the final FRMPs which will be published towards the end of 2015.

ANNEX A

Summary of Consultation Questionnaire comments and Departmental Responses

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?

Respondent	Yes	No	Respondent Comments	Department's Response
AFBI	✓		The Flood risk management plan focuses on a number of (mainly urban) flood risk areas and the associated statutory environmental issues which have to be taken into account. It appears to have considered all it has to by law, the Strategic Environmental Assessment (SEA) and Habitats regulations Assessments (HRA) making reference to Priority species and Habitats, and EU legislation with which it has to comply.	As required by the Floods Directive, the Flood Risk Management Plans (FRMPs) are focused on managing the flood risk only within the Significant Flood Risk Areas which have been identified as part of the Preliminary Flood Risk Assessment and reported to the EC.
Antrim & Newtownabbey Borough Council	✓		<p>The structured and scientific approach taken to identify the Significant Flood Risk Areas in compliance with the EU Directive requirements is recognised and welcome. The comprehensive nature of the mapping work across the province should be commended.</p> <p>Council recognises that in times of limited resources, a risk assessment process which effectively assists in prioritising those areas that should attract appropriate preventative, protection, and preparedness actions and activities is essential.</p> <p>Whereas it is important to identify the areas where the impact of future possible flooding is most significant, Council also recognises that the areas identified are not the only areas that have experienced historical flooding and will continue to encourage all organisations to mitigate against the effects of flooding in these areas also.</p>	<p>The Department welcomes the Council's comment that the approach taken to identify the location of Significant Flood Risk Areas (SFRA) and its recognition that a risk based approach to the prioritisation of flood mitigation measures is essential.</p> <p>The Council can be assured that although the Floods Directive requires that FRMPs are focused specifically on the SFRA's that have been reported to the EC, all of the flood authorities will continue to manage the risk of flooding in locations outside of the SFRA's through their normal business. Investment in flood mitigation schemes will continue to be prioritised on the basis of an economic appraisal regardless of location and there is no intention to target spending on the SFRA's alone at the expense of the other flood prone communities located throughout the province.</p>
Armagh City, Banbridge & Craigavon Council	✓		<p>Generally The Council agrees with the methodology and do commend those involved in the construction of the draft plans in what appears to be a comprehensive approach to managing flood risk.</p> <p>Whilst reference is given to the multi-faceted nature of Flood Risk Management it is pertinent to share experiences of some recent events indeed share learning from council involvement. The recent</p>	The Department is aware of the importance of managing the risk of flooding from reservoirs and understands the concerns raised by Council. It is for this reason that the Department sought, and obtained, the agreement of the NI Executive to bring forward primary legislation to regulate reservoirs in Northern Ireland that are capable of holding 10,000m ³ or more of water. The incident at Camlough Lake in November 2014 has served to reinforce the clear need for appropriate regulation in this area.

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?

Respondent	Yes	No	Respondent Comments	Department's Response
			experiences and associated mitigation methodology deployed surrounding the November 2014 Camlough Lake incident, should serve as a reminder that such impoundments of which there are approximately 150 in Northern Ireland, require added focus. Whilst the primary legislation, enabling agencies to manage water impoundments "The Reservoirs Bill" is still with the legislative process, all stakeholders should consider the overall risks and mitigation measures necessary to manage flooding from such a source. The fact that legislation remains incomplete will not mitigate against the potential impacts flooding of this type could cause hence the plans could emphasise the need to future proof resilience methods.	<p>The primary legislation, known as the Reservoirs Bill, was introduced in the Assembly in January 2014 and completed the legislative process on 24 June this year. The Reservoirs Bill received Royal Assent on 24 July and is now the Reservoirs Act (Northern Ireland) 2015.</p> <p>While the precise number of reservoirs that will be regulated under this Act will not be known until the registration process is completed, we estimate that there will around 130. Regulation of reservoirs will aim to ensure that those responsible for managing and operating reservoirs, capable of holding 10,000m³ cubic metres or more of water, do so to industry standards and thereby reduce the risk of flooding from an uncontrolled release of water due to dam failure.</p>
Belfast City Council	✓			
Carrickfergus Borough Council	✓			
Craigavon Borough Council	✓			
Fermanagh & Omagh District Council	✓		Agree with the methodology and do commend those involved in the construction of the draft plans in what appears to be a comprehensive approach to managing flood risk	The Department notes and welcomes the Council's comment.
Freshwater Task Force/ Enagh Sustainable Development Forum/Holy Well Trust			The FWTF would emphasise the need to think about flood risk in, for example, protected and biodiversity-rich areas. There is, rightly, a focus on urban areas in the plans, but we need strategies to deal with flood risk across a mix of land types and uses.	<p>It is a requirement of the Floods Directive that the Flood Risk Management Plans are focused on managing the flood risk within the Significant Flood Risk Areas which have been identified as part of the Preliminary Flood Risk Assessment and reported to the EC.</p> <p>Therefore, specific policies/strategies to deal with flood risk beyond these areas are outside the requirements of the Floods Directive and as a consequence they are not a matter to be addressed through this consultation exercise. In this regard, reference should be made to the</p>

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?

Respondent	Yes	No	Respondent Comments	Department's Response
				Long Term Water Strategy for Northern Ireland.
Institution of Civil Engineers (ICE)	✓			
PSNI	✓			
Mid and East Antrim Council	✓			
NI Fire and Rescue Service	✓		The methodology has produced a comprehensive record of the highest flood risk areas across Northern Ireland.	The Department notes the Service's comment.
NI Housing Executive	✓			
NI Water	✓			
Six Mile Water Trust also Antrim & District Angling Club		✓	We agree in principal however your "Methodology" appears to be based on past evidence which by your own admission is not fool proof, coupled with changing rainfall and a continual obsession to develop on top of known risk areas . All of which can have a significant impact on the already known risk.	<p>The Department does not accept that the methodology for determining the flood risk areas was <i>'based on past evidence'</i>. Although flood history played a part in the methodology, it largely focused on the output from a range of predictive digital flood models which were produced for each of the flood sources in accordance with industry best practice and is consistent with the approach taken by all other flood authorities in the UK and Ireland. These models take into account the predicted climate changes due to global warming and the degree of urbanisation within catchments.</p> <p>The Department does not accept that there is a <i>'continual obsession to develop on known flood risk areas'</i>. Government is committed to sustainable development and the conservation of biodiversity. Planning Policy Statement PPS15 – Planning and Flood Risk ensures that flood risk is taken into taken into account in preparing development plans and is also material to decisions on individual planning applications and appeals. The aim of PPS15 is to prevent development that may be at risk from flooding</p>

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?

Respondent	Yes	No	Respondent Comments	Department's Response
			What is the factor / margin of safety in all of these estimations	<p>or that may increase the risk of flooding elsewhere. Since the introduction of PPS15 in 2006 it has been largely successful at preventing development in known flood risk areas with few notable exceptions.</p> <p>There is high degree of certainty with the output from the digital flood models that have been developed for each of the SFRAs. The models will continue to be refined as new data becomes available to ensure that future flood risk management decisions are made on the best available information at that time.</p>
Ulster Farmers Union (UFU)	✓			

Question 2: Do you understand and agree with the objectives as described in the draft plan?

Respondent	Yes	No	Respondent Comments	Department's Response
AFBI	✓			
Antrim & Newtownabbey Borough Council	✓		<p>The Plans objectives give consideration to reducing the likelihood of flooding; and, reducing the adverse consequences of flooding for human health, economic activity and the environment including cultural heritage. The objectives set in relation to three areas of impact are:</p> <p>Economic Activity, To reduce economic damages to properties; To reduce the economic costs on business caused by the disruption to essential infrastructure and services; and, To optimise the economic return on Flood Risk Management investment.</p> <p>Human Health and Social, To reduce the risk to life; To raise awareness of the consequences of flood risk; To reduce risk to health and wellbeing; To reduce the impact on people caused by the disruption to essential infrastructure and services; and To improve recreation and public amenities.</p> <p>Environmental (including cultural heritage)•To consider the impact of Climate Change across all areas of impact; Under the Water Framework Directive, to support the achievement of good ecological potential/status for water bodies; To reduce the risk of pollution; To avoid or mitigate the impact on priority species and habitats; and, To avoid or mitigate the impact on designated environmental areas, including those of cultural heritage importance.</p> <p>Council would concur with these objectives.</p>	The Department notes and welcomes the Council's comment.
Armagh City, Banbridge & Craigavon Council	✓			
Belfast City Council	✓		We are broadly content with the objectives and their associated activities however we would suggest:	The Department will revise the wording of the objectives to ensure that it is clear that the FRMPs will aim to reduce the economic damage to infrastructure.

Question 2: Do you understand and agree with the objectives as described in the draft plan?

Respondent	Yes	No	Respondent Comments	Department's Response
			<ul style="list-style-type: none"> • Under economic activity: <ul style="list-style-type: none"> ○ There could be a reference to loss of agricultural land and the impact on livestock (unless a separate objective is made for animal welfare) ○ 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: <ul style="list-style-type: none"> ○ 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') ○ A mental health and wellbeing reference should be included. <p>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:</p> <ul style="list-style-type: none"> • 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 	<p>The purpose of the FRMPs is to establish appropriate objectives for the management of flood risk within areas of potential significant flood risk. Within Northern Ireland the Department has determined, based on an economic assessment of potential future flood damages, that there are 20 Significant Flood Risk Areas (SFRA). These areas are all urban in nature due to the fact that the cost of flood damage within a developed area is significantly higher than an equivalent agricultural area. Therefore the objectives of the plan must focus on the mitigation of the flood risk within the 20 named SFRA.</p> <p>Under the Human Health and Social, the objectives, <i>'To raise awareness of the consequences of flood risk'</i> will be replaced with <i>'To raise awareness and understanding of flood risk'</i>.</p> <p>The Department is satisfied that the stated objective <i>'To reduce risk to health and wellbeing'</i> is appropriate.</p> <p>The Department does not consider that it would be more appropriate to rationalise and combine the objectives as suggested by Council.</p>
Carrickfergus Borough Council	✓			

Question 2: Do you understand and agree with the objectives as described in the draft plan?

Respondent	Yes	No	Respondent Comments	Department's Response
Craigavon Borough Council	✓			
Fermanagh & Omagh District Council	✓			
Freshwater Task Force/ Enagh Sustainable Development Forum/Holy Well Trust			<p>The FWTF is pleased to see focus on:</p> <ul style="list-style-type: none"> • health and wellbeing • Resilience of infrastructure and services • Recreation and public amenities • Climate change impacts and adaptation • Heritage importance <p>as part of the wider objectives of flood risk management in NI.</p> <p>While Green Infrastructure is not a flooding panacea, it does go towards tackling the problem in some areas – and at the same time provide many other benefits outlined in the wider objectives of the document. In terms of Flood Risk Management, we would particularly emphasise the potential importance of green infrastructure networks in urban areas / areas with urban hydrological characteristics. The concept of 'ecosystem services' is very important in an urban context. By 'ecosystem services' we mean the benefits that flow to society from the environment – the good things that nature does for us. The FWTF suggests that there should be explicit mention of the utilization of ecosystem services (i.e. the use of green and blue spaces in urban areas to alleviate flooding issues) in the Flood Risk Management Plans. In the context of urban space, this is perhaps better conceptualised as 'green infrastructure' (using the environment to provide solutions to societal and economic problems). The Connswater Community Greenway is a good contemporary example of this, providing flood alleviation while at the same time meeting many other societal objectives.</p>	<p>In the Department's approach to the development of flood alleviation schemes, the concept of 'ecosystem services' is taken into consideration. A recent significant example of our commitment to this approach is the East Belfast Flood Alleviation Scheme at Orangefield Park where the Knock River was diverted within the Park to alleviate flooding, to make it a feature and improve the Park environment. The Department acknowledges the potential of green infrastructure and will continue to support the multi-agency approach in dealing with such issues.</p> <p>Also, the Department recognises the potential role that natural flood management (NFM) could play in reducing the peak flows for low return period flood events in small predominantly rural catchments. The Department will be supportive of the deployment of NFM measures where there is sufficient scientific evidence that they support the delivery of significant flood mitigation benefits and when it is cost beneficial to do so. As NFM has been an issue raised by a many of the respondents to the consultation, the Department undertakes to revise the FRMPs to provide details of its position in regard to this potential flood mitigation measure.</p>

Question 2: Do you understand and agree with the objectives as described in the draft plan?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>We are pleased to see reference made to land-use planning decisions and recommend that the River Agency engages with these issues in the preparation of Local Development Plans in the new Councils. The ecosystem services delivered in urban areas are largely 'invisible' to the current planning system, and are therefore undervalued and under-protected. In this context, it may be useful to develop a green infrastructure strategy for urban areas in NI.</p> <p>As such, we are pleased to see SuDs featuring in the Plans, as a crucial mechanism toward dealing with surface water and managing urban hydrology. At present in NI the application of SUDS is relatively weak (it is currently an annex in a Planning Policy Statement) and we would suggest that SuDS warrant much more of a focus and on-the-ground presence.</p> <p>Significant research is being carried out to understand the impacts of climate change on urban hydrology¹ (coming from the combined work of those carrying out downscaled climate projections and hydrological modelling). This work suggests that prolonged and intense winter precipitation will result in increased output of surface runoff, throughflow, groundwater flow, and river and marine outfalls. Even in summer, surface runoff is expected to increase as a result of climate change (linked to the intensity of late summer rainfall events associated with increased convective activity). We would stress that in all flooding scenarios, natural functions and processes should be given space to work. Nature buffers against flooding more effectively than man-made infrastructure, therefore we should seek to work with nature and not against it – by this we mean allowing natural processes to work unhindered by societal encroachment. This concept is captured in the NI Long Term Water Strategy as 'designing for exceedance'.</p>	<p>The Department's Rivers Agency has a long history of working closely with Planning NI to raise awareness of, and provide advice in relation to, flood risk. It assisted Planning NI with the production of PPS15 and its revisions; it provides advice on individual planning applications and regularly gives presentations to their staff on how to use and interpret Rivers Agency's flood risk information. As a result of the new two-tier planning system Rivers Agency will work with council planning departments to ensure that they have the necessary skills and capacity to take proper account of flood risk in execution of their development planning responsibilities.</p> <p>NIEA's Strategy for the Promotion of the use of SuDS within Northern Ireland was published in 2011. The aim of this strategy is to establish SuDS as the preferred approach for managing the storm water discharges which arise from the development of land. Although many of the recommendations within this strategy have been adopted, some work remains to be done to establish the full realisation of SuDS as a viable and routinely adopted solution to storm water management. The Department will revise the FRMPs to clearly describe the current position with SuDS and outline the ongoing work to promote and support their wider use.</p>

Question 2: Do you understand and agree with the objectives as described in the draft plan?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>There is a perceived lack of coordination with the Water Environment (Floods Directive) Regulations (Northern Ireland) 2009. Clause 17 of the Regulations lists the number of considerations which the measures listed 'shall take account of' – however, a number of these have been omitted from the dFRMPs:</p> <p>(vii) soil and water management;</p> <p>(viii) anything done under or in pursuance of the Planning (Northern Ireland) Order 1991(1) which affects development or the use of land within the river basin district to which the plan relates;</p> <p>(x) the conservation of nature whether within or outside the river basin district to which the plan relates; and</p> <p>(xi) navigation and port infrastructure; and</p> <p>(b shall consider, so far as is appropriate, structural and non-structural measures and the reduction of the likelihood of flooding as means of achieving objectives.'</p>	<p>The Department considers that there is appropriate coordination between the draft FRMPs and the Floods Directive Regulations. The Regulations state that the Department shall, <i>in 'setting objectives and identifying measures'</i> for the FRMPs, <i>'take account of, so far as relevant'</i> the matters to which the respondent refers.</p> <p>For example, in relation to navigation and port infrastructure, all of the stakeholders that own and operate our navigation and port infrastructure have been consulted in relation to the potential risk to their assets and business and have their own plans in place to mitigate these risks. In addition, the FRMPs indicate that Rivers Agency has commenced the Belfast Tidal Flood Study to assess all viable options for the management of the tidal flood risk to Belfast. All of the main stakeholders within the Port of Belfast are working closely with us on this project.</p> <p>Likewise, the effects of development and land use planning are fully addressed within the draft FRMPs as Government's Planning Policy Statement, PPS15 – Planning and Flood Risk Planning Policy is an essential element of the FRMPs. PPS 15 gives effect to Government's clear commitment to sustainable development and the conservation of biodiversity. It ensures that flood risk is taken into account in preparing development plans and is also material to decisions on individual planning applications and appeals. The aim of PPS15 is to prevent development that may be at risk from flooding or that may increase the risk of flooding elsewhere. Since the introduction of PPS15 in 2006, development in known flood risk areas has been prevented apart from a few notable exceptions. Therefore, PPS15 is a key element of the FRMPs and its importance is highlighted throughout the document.</p> <p>The Department is content that the FRMPs contain the details of an appropriate range of structural and non-structural measures to mitigate the flood risk within each SFRA.</p>
Institution of Civil Engineers (ICE)	✓			

Question 2: Do you understand and agree with the objectives as described in the draft plan?

Respondent	Yes	No	Respondent Comments	Department's Response
PSNI		✓		
Mid and East Antrim Council	✓			
NI Fire and Rescue Service	✓			
NI Housing Executive	✓			
NI Water	✓			
Six Mile Water Trust also Antrim & District Angling Club	✓			
Ulster Farmers Union (UFU)	✓		<p>The three objectives, of safeguarding economic activity, human health and social and the environment seem to us to be more than acceptable. It is not the case that these goals need to be in competition as they can and should complement each other, and a loss to any of the three can carry a loss in the other categories as well. For example, the loss of productive agricultural land is both an environmental and an economic loss and as such, should be treated as a serious issue. The financial implications also mean that a farmers mental health and well-being could be seriously impacted upon by the damage to the land by flooding. For this reasons, the areas where these objectives overlap should be identified and planned for accordingly.</p> <p>The proposal to make grant aid available for land owners to help improve flood prevention and mitigation are of interest to us as it would allow farmers and landowners to take measures on their land</p>	<p>The Department accepts the UFU's analysis that flooding of agricultural land is a serious issue that has the potential to adversely affect the environment and cause financial losses to farmers which in turn, may affect their mental health and wellbeing. However, the purpose of the FRMPs is to establish appropriate objectives for the management of flood risks for the 20 named Significant Flood Risk Areas (SFRA) that have been reported to the EC following completion of the Preliminary Flood Risk Assessment. As the primary aim of the FRMPs is to identify measures that reduce the flooding in these 20 predominantly urban areas, it would not be accurate to give the impression that these will reduce flooding of agricultural land in the wider catchment</p> <p>The Department is unclear as to the intent of this statement. Apart from the proposed introduction of the Homeowner Flood Protection Grant Scheme, which would assist farmers with the cost of protecting their</p>

Question 2: Do you understand and agree with the objectives as described in the draft plan?

Respondent	Yes	No	Respondent Comments	Department's Response
			which will achieve the measures of the strategy in the most beneficial way for them.	homes should they be at flood risk, there are no specific proposals in the draft FRMPs to grant aid farmers for reasons of flood alleviation.

Question 3: Do you agree that there is the right balance between social, economic and environmental objectives?

Respondent	Yes	No	Respondent Comments	Department's Response
AFBI			Given that the stated purpose of the FRMP is " <i>to provide a holistic, structured approach to the management of flood risk and to inform decisions on reducing the adverse impact of flooding on human health, economic activity, cultural heritage and the environment</i> " the absence of a specific section on freshwater fisheries (which ought to include commercial, recreational, and conservation/general environment) impacts looks like an omission	Freshwater fisheries are included in the bio-diversity assessment of flora and fauna at a strategic level. The FRMPs do not address site specific measures due to their strategic nature. However, all planned flood alleviation works are subject to the Drainage (Environmental Impact Assessment) Regulations (Northern Ireland) 2006. This legislation requires the Agency to consider the effects on the environment of all proposed works. The Department fully complies with the requirements of these regulations which ensure that all proposed schemes are widely publicised, that all stakeholders, including the general public, are given an opportunity to forward their opinion on a scheme and its likely effects. Where there is a determination that a scheme it is likely to have significant environmental effects, an environmental statement is prepared by the Department for public consultation. On the basis of the representations received through the consultation on the environmental statement, the Department will determine if a scheme shall proceed in whole or in part, with whatever measures are necessary to 'avoid, reduce and if possible, remedy significant adverse effects'.
Antrim & Newtownabbey Borough Council	✓			
Armagh City, Banbridge & Craigavon Council		✓	<p>The focus of flood risk management has been largely on domestic properties, however most recent events particularly in Newry City have highlighted the need to communicate risk management strategies to retail and commercial business premises. The degree of risk ownership should be fully explained to commerce similar to the methodology deployed in the domestic community resilience pilot areas.</p> <p>Whilst the flood risk maps are much improved and great efforts have been undertaken to disseminate their attributes and accessibility, the potential impact from flooding could be more refined by incorporating up to date demographic information from 2011</p>	<p>The Department agrees that the Regional Community Resilience Group pilot project has mainly focused on residential properties. The draft FRMPs contain details of 20 new pilot areas that have been identified for community resilience. One of the planned areas, Omagh town, contains a significant cluster of commercial and retail premises. It is anticipated that lessons learnt through this particular community resilience project will assist with the development of mechanisms to better inform and involve the owners of retail and commercial properties in relation to flood resilience.</p> <p>Rivers Agency is continually updating the datasets on the flood maps that are accessible to Councils through the Rivers Agency's Stakeholder Viewer and Spatial NI. If Councils desire specific requirements for additional data to be available through Rivers Agency's Map Services, they should contact</p>

Question 3: Do you agree that there is the right balance between social, economic and environmental objectives?

Respondent	Yes	No	Respondent Comments	Department's Response
			census. This data could further inform the potential mitigation and response needs for vulnerable groups and in the defence of Critical Infrastructure and assist in the implementation of the vulnerable person's protocol. This could be augmented by further development of spatial NI mapping yet to be fully operationalised.	the Agency's Mapping and Modelling Unit to discuss if this is possible.
Belfast City Council	✓		<p>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.</p> <p>For example: The flood risk management plans will Contribute to a strong economy and improved health and social wellbeing by:</p> <ul style="list-style-type: none"> • 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 <p>Protecting the environment from the impact of flooding</p>	The Department's position in relation to Council's suggestion to reword the stated objectives of the FRMPs can be found in its response to Question 2.
Carrickfergus Borough Council	✓			
Craigavon Borough Council		✓	It is important that a proportionate weight is given to each objective to ensure that the adequate dredging of rivers to protect farm land is not inhibited as a result of protection being given to the natural habitat.	Rivers Agency undertakes regular maintenance works on designated watercourses. This work is undertaken using environmentally sensitive river engineering techniques and is necessary to alleviate flooding and to assist land drainage. The draft FRMPs do not seek to prevent or restrict this work in the future.

Question 3: Do you agree that there is the right balance between social, economic and environmental objectives?

Respondent	Yes	No	Respondent Comments	Department's Response
Fermanagh & Omagh District Council	✓		<p>The focus of flood risk management has been largely on domestic properties. The recently published flood modelling carried out for towns such as Omagh highlighted the need to communicate risk management strategies to retail and commercial business premises. The degree of risk ownership should be fully explained to commerce similar to the methodology deployed in the domestic Community Resilience pilot areas.</p> <p>Whilst the flood risk maps are much improved and great efforts have been undertaken to disseminate their attributes and accessibility, the potential impact from flooding could be more refined by incorporating up to date demographic information from the 2011 census. This data could further inform the potential mitigation and response needs for vulnerable groups and in the defence of critical infrastructure. This could be augmented by the further collaboration with Spatial NI.</p>	<p>The Department agrees that the Regional Community Resilience Group pilot project has mainly focused on residential properties. The draft FRMPs contain details of 20 new pilot areas that have been identified for community resilience. One of the proposed new areas for community engagement, Omagh town, contains a significant cluster of commercial and retail premises. It is anticipated that lessons learnt through this particular community resilience project will assist with the development of mechanisms to better inform and involve the owners of retail and commercial properties in relation to flood resilience.</p> <p>Rivers Agency is continually updating the datasets on the flood maps that are accessible to Councils through the Rivers Agency's Stakeholder Viewer and Spatial NI. The Department believes that most, if not all of the information highlighted by Council is available through the Rivers Agency's Stakeholder Viewer which can be accessed by approved users via https://mapping.dardni.gov.uk</p>
Freshwater Task Force/ Enagh Sustainable Development Forum/Holy Well Trust			<p>The overarching importance of the environment should be acknowledged as the envelope in which economic and social activity takes place. We, of course, recognise the importance of social and economic objectives, but would also suggest that environment sits as the focus of the objectives because it is from the successful management of the water environment system (in terms of volume, space, connectedness, etc.) that economic and social benefits will flow. In this context, managing the environment appropriately must come first.</p>	<p>The Floods Directive does not indicate that environmental objectives should take precedence in the development of the FRMPs. The Department acknowledges the importance of protecting and enhancing the environment in carrying out its functions. However, it does not consider that it would be appropriate for the focus of the FRMPs to be on the delivery of environmental objectives as a means of securing the delivery of other key objectives such as reducing the risk to human health.</p> <p>Protection for the water environment is secured through compliance with the requirements of legislation including for example, The Water Environment (Water Framework Directive) Regulations; The Water (NI) Order; the Groundwater Regulations (NI) and The Pollution Prevention and Control (NI) Regulations. In preparing the FRMPs, the Department took due cognisance of the environment by undertaking an appropriate Strategic Environmental Assessment and Habitats Regulatory Assessment. In addition, all planned flood alleviation works undertaken by the Department are subject to the Drainage (Environmental Impact</p>

Question 3: Do you agree that there is the right balance between social, economic and environmental objectives?

Respondent	Yes	No	Respondent Comments	Department's Response
				Assessment) Regulations (Northern Ireland) 2006. This legislation requires the Agency to consider the effects on the environment of all proposed works. The Department fully complies with the requirements of these regulations which ensure that all proposed schemes are widely publicised, that all stakeholders, including the general public, are given an opportunity to forward their opinion on the scheme and its likely effects. Where there is a determination that the scheme it is likely to have significant environmental effects, an environmental statement is prepared by the Department for public consultation. On the basis of the representations received through the consultation on the environmental statement, the Department will determine if a scheme shall proceed in whole or in part, with whatever measures are necessary to 'avoid, reduce and if possible, remedy significant adverse effects'..
Institution of Civil Engineers (ICE)	✓			
PSNI	✓			
Mid and East Antrim Council	✓		The focus of flood risk management objectives has been largely on private residential properties. Experience has shown that commercial properties can, and have suffered economic loss as a result of flooding e.g. The Diamond, Ahoghill in 2008. The recently published flood modelling carried out for towns and villages in our Borough has highlighted the risk of flooding to retail and commercial business premises. The principles of risk ownership should be extended to the business communities and commercial sector similar to the methodology applied to the domestic Community Resilience pilots. Not only will this enhance ensure inclusivity of approach, but address economic impact for 'at risk' businesses.	The Department agrees that the Regional Community Resilience Group pilot project has mainly focused on residential properties. The draft FRMPs contain details of 20 new pilot areas that have been identified for community resilience. One of the planned areas, Omagh town, contains a significant cluster of commercial and retail premises. It is anticipated that lessons learnt through this particular community resilience project will assist with the development of mechanisms to better inform and involve the owners of retail and commercial properties in relation to flood resilience.
NI Fire and Rescue Service	✓		To date, RCRG activity in particular, has focussed on domestic property as this is the area of highest potential risk. Perhaps, some additional focus could be directed towards the business community	The Department agrees that the Regional Community Resilience Group pilot project has mainly focused on residential properties. The draft FRMPs contain details of 20 new pilot areas that have been identified for

Question 3: Do you agree that there is the right balance between social, economic and environmental objectives?

Respondent	Yes	No	Respondent Comments	Department's Response
			to better inform their business continuity planning or environmental protection arrangements.	community resilience. One of the planned areas, Omagh town, contains a significant cluster of commercial and retail premises. It is anticipated that lessons learnt through this particular community resilience project will assist with the development of mechanisms to better inform and involve the owners of retail and commercial properties in relation to flood resilience.
NI Housing Executive	✓		The balance is good, but a casual reader may only associate the risks to health and well-being as being purely physical and miss the issue of mental health. It may be useful to mention this, particularly in light of Red Cross/ BCC research and PHA/ Red Cross discussions recently on the topic of emotional and psychological wellbeing.	The Department accepts that the distress suffered by people affected by flooding can have a profound effect on their health and well-being and that some can go on to develop serious mental health problems. It is aware of this issue through its involvement with the Regional Community Resilience Group's Pilot Project and also from current research work into emotional and psychological wellbeing that is being undertaken by organisations such as the Red Cross. The outcome of this research is expected during this particular Plan period and could inform the development of future approaches and specific measures to improve community resilience in this area. Any decision to develop specific strategies to address this issue is a matter for the health professionals, including the Public Health Agency (PHA) and the Department of Health, Social Services and Public Safety (DHSSPS). If there is a decision to develop specific measures to mitigate the potential adverse mental health effects from flooding, the Department will rely on advice from health professionals regarding whether these should be particularised in any future Plans.
NI Water	✓			
Six Mile Water Trust also Antrim & District Angling Club		✓	Unable to comment as the present economic climate is in chaos.	The Department notes the respondent's comment.
Ulster Farmers Union (UFU)	✓		It is clear to all that the protection of human life, health and homes should be the number one priority of any risk management plan. In	The Department notes and agrees with the UFU's view on the importance of adopting a partnership approach to flood risk management.

Question 3: Do you agree that there is the right balance between social, economic and environmental objectives?

Respondent	Yes	No	Respondent Comments	Department's Response
			terms of fulfilling the criteria of the other three areas, the use of partnership working in catchment basin management shows clearly the best way to keep social, economic and environmental objectives in harmony. As mentioned previously, there is no need for these objectives to be in conflict and a partnership approach allows for the concerns of all groups to be heard and solutions found which are workable and sustainable.	

Question 4: Do you agree with the proposed measures identified for each of the significant flood risk areas?

Respondent	Yes	No	Respondent Comments	Department's Response
AFBI				
Antrim & Newtownabbey Borough Council	----	----	See response to Questions 5 and 6	
Armagh City, Banbridge & Craigavon Council	✓		<p>The Council generally agrees. Reports such as Pitt 2008 and PEDU 2012 have informed, and recommendations therein have provided both scientific and anecdotal evidence based learning. This combined with the most recent experiences including feedback from the Community Flood Pilots all offer indicators stakeholders should consider.</p> <p>Much good work has been undertaken by all agencies, perhaps with this consultation you may wish to re-evaluate actual risks in line with Emergency Planning Cycle, Cabinet Office (2011;17) and the potential impacts associated with factors including climate change.</p>	<p>The Department recognises the importance of the Pitt and PEDU reports and their findings have been taken into consideration in the development of the FRMPs. The potential increased flood risk as a consequence of climate change has been modelled and mapped and will be taken into consideration in all flood alleviation measures and in development planning decisions.</p>

Question 4: Do you agree with the proposed measures identified for each of the significant flood risk areas?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>Also of note is the added use of monitoring devices in known flood risk catchment areas. The data and subsequent interpretation of such data should be adequately explored and cognisance given to the imbalance of the scientific view over the lay persons view Irwin (1995;127), Pitt (200:322).</p> <p>Finally, the uncertainty surrounding resilience structures and the process of change associated with the reform of local government (RPA) must be recognised as a potential stressor to resilience plans, flooding or otherwise. The work of the multiagency forums and in particular the co-ordination role of local government EPCOs has been vital. This is highlighted in the draft document DARD (2014;35;492) Authors of future drafts must be aware of any potential changes to resilience structures.</p>	<p>The Department recognises the importance of river level monitoring and is currently looking at options to make the extensive information it holds on river levels more widely available to the public through the internet. In addition, appropriate flood warning and informing systems for communities located within flood prone areas continue to be developed by the Department.</p> <p>The Department agrees that the Local Government EPCOs play a vital role in flood emergency planning and their involvement in the Local Flood Forums is greatly appreciated. The authors in the next FRMP cycle will be fully informed of all resilience structures and emergency planning structures regarding flooding.</p>
Belfast City Council		✓	<p>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.</p> <p>[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</p>	<p>The Flood Risk Management Plans will be updated to reflect the new two-tier planning system in which Councils are now responsible for the majority of planning decisions, planning enforcement and the preparation of Local Development Plans for their areas. Local Development Plans must be produced in line with the DOE's Strategic Planning Policy Statement, which reflects in a strategic way, the existing provisions of the recently revised PPS15 – Planning and Flood Risk. Therefore, it will be a matter for Councils to ensure that they have processes and effective arrangements in place to produce Local Development Plans that give appropriate consideration of flood risk.</p> <p>Rivers Agency has a long history of working closely with Planning NI to raise awareness of, and provide advice in relation to, flood risk. It assisted</p>

Question 4: Do you agree with the proposed measures identified for each of the significant flood risk areas?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>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.</p> <p>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.</p> <p>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</p>	<p>Planning NI with the production of PPS15 and its revisions, provides advice on individual planning applications and regularly gives presentations to their staff on how to use and interpret Rivers Agency's flood risk information. As a result of the new two-tier planning system Rivers Agency shall work with all Council planning departments to ensure that they have the necessary skills and capacity to take proper account of flood risk in execution of their development planning responsibilities.</p> <p>The Department notes that the Local Government Emergency Management Group no longer exists and will amend the Plans accordingly. It will also ensure that the emergency planning arrangements described in the Plans are revised to reflect the outcome of the ongoing review of the local government civil contingencies arrangements, if this is available prior to completion of the FRMPs.</p> <p>The Council was consulted on the detail of the proposed Homeowner Flood Protection Scheme which should be in operation in autumn 2015. Details of this scheme will be included in the FRMPs.</p> <p>Rivers Agency will review and, if necessary, revise the FRMPs to ensure that the existing linkages between the various flood risk management groups are clearly described.</p> <p>The role of the inter-departmental Flood Investment and Planning Group (FIPG) is to ensure there is a coordinated approach to the investigation and resolution of existing flooding problems when it is unclear which of the authorities is responsible or when more than one authority has a responsibility and it isn't obvious which of the authorities should take the lead. The Department accepts that the limits of FIPG's remit aren't fully apparent from the description in the draft FRMPs and this will be revised in the final FRMPs. It was never intended that FIPG would integrate with local development and regeneration agendas as it was established to deal specifically with known flooding hotspots, most of which are fairly limited in scale.</p>

Question 4: Do you agree with the proposed measures identified for each of the significant flood risk areas?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>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.</p> <p>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.</p> <p>Further to the general comments above the following are additional specific suggestions</p> <ul style="list-style-type: none"> • Under flood prevention there should be measure activities regarding: <ul style="list-style-type: none"> ○ 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) ○ 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 	<p>It is accepted that there is still room for improvement in regard to multi-agency coordination and cooperation to secure a more proactive strategic approach to investment in work programmes. However, a substantive review of these arrangements is not likely to take place until 2016 when all of the key drainage infrastructure providers (NI Water, Transport NI and Rivers Agency) along with the Strategic Investment Unit, will be brought together under the remit of a new Department for Infrastructure.</p> <p>In relation to to the role of the newly formed Strategic Drainage Infrastructure Programme Board (SDIPB), its objective is to develop a strategic drainage plan for Belfast that will include a programme of works to reduce untreated overflows from the city's combined sewerage system to improve the water quality of Belfast Lough and reduce flooding. The strategic development plan, which could take up to three years to develop, will contain a mixture of traditional and SuDS solutions. Early estimates are the necessary works may require an investment of £750m over a ten year period. It is presently unclear if SDIPB will have an overseeing or coordination role for all future investment in Belfast's drainage infrastructure. The final FRMPs will reflect the known position regarding the role of SDIPB.</p> <p>As stated previously, Rivers Agency has a long history of working with Planning NI to raise awareness of, and provide advice in relation to flood risk. With the introduction of the new two-tier planning arrangements this work will be extended to include Council planning departments.</p> <p>Rivers Agency has discretionary powers to maintain watercourses that have been designated by the Drainage Council for Northern Ireland. When proposing the designation of a watercourse the Council must be satisfied that any drainage works that are needed are outside the capability of the landowner and that works at public expense on the watercourse provide value for money. Therefore, Rivers Agency will carefully consider all of the factors relating to a watercourse when deciding if it should be designated.</p> <p>Where appropriate, the use of temporary flood defences is considered</p>

Question 4: Do you agree with the proposed measures identified for each of the significant flood risk areas?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>scale flood barriers, hesco bastions and geo barriers.</p> <ul style="list-style-type: none"> • 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. 	<p>when assessing the various options to protect communities against flooding, but it is only viable when there is a prospect that a reasonably accurate and timely flood warning can be issued. This is exactly the type of solution that is being considered to protect Belfast from coastal flooding.</p> <p>NIEA's Strategy for the Promotion of the Use of SuDS within Northern Ireland was published in 2011. The aim of this strategy is to establish SuDS as the preferred approach for managing the storm water discharges which arise from the development of land. Although many of the recommendations within the Strategy have been adopted we still don't have the legislative changes necessary to enable the full realisation of SuDS as a more routinely used option for storm water management. The FRMPs will be revised to include more details on the work done to date to promote and support the use of SuDS and how this is to taken forward during the life of the FRMPs.</p> <p>The Department accepts that the work to develop community emergency plans '<i>is more than warning and informing</i>' and will revise the description of this work to include other important aspects such as education and awareness of flood risk.</p> <p>The Department accepts that the FRMPs should include details of measures that it proposes to take to promote a greater public awareness of flood risk. Rivers Agency's detailed flood mapping clearly illustrates healthcare infrastructure which is at risk of flooding; this information is available for use by those involved in flood emergency planning and response.</p>

Question 4: Do you agree with the proposed measures identified for each of the significant flood risk areas?

Respondent	Yes	No	Respondent Comments	Department's Response
			<ul style="list-style-type: none"> 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. <p>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.</p>	<p>The Department notes the Council's concerns in regard to the funding limitations on the organisations which play an important community engagement role.</p>
Carrickfergus Borough Council	✓			
Craigavon Borough Council		✓	<p>It is considered that action should be taken to ensure that the lands adjacent to the River Bann and Ballybay River are adequately drained.</p> <p>Mention is made on Page 155 under the heading 'Existing Flood Defences' of the fact that 'A flood alleviation scheme was proposed for the lower reach of the Ballybay River in the early 2000s. However, this proposal was rejected by Craigavon Borough Council.'</p> <p>This was only rejected because the plan included a high flood defence wall along the River Bann from the Boat House to the Ulster Carpet factory which would have only served to:-</p> <ul style="list-style-type: none"> Cut off the view of the River from the town when efforts were being made to promote the development of the riverside and use of the river; and Channel flood waters further downstream thereby increasing the risk of flooding in those areas which have been historically impacted including as recently as November 2014. 	<p>The Department has a planned maintenance programme to ensure that all designated watercourses within the Armagh, Banbridge and Craigavon District Council area are maintained to an appropriate standard.</p> <p>The Department acknowledges and accepts Council's reasons for objecting to the flood alleviation scheme that was proposed for the lower reach of the Ballybay River.</p>

Question 4: Do you agree with the proposed measures identified for each of the significant flood risk areas?

Respondent	Yes	No	Respondent Comments	Department's Response
Fermanagh & Omagh District Council	✓		However, reports such as Pitt 2008, and the PEDU Report 2012 have informed, and recommendations therein have provided both scientific and anecdotal evidence based learning. This combined with the most recent experiences including feedback from the Community Resilience Flood Pilots all offer indicators that stakeholders should consider.	The Department recognises the importance of the Pitt and PEDU reports and their findings have been taken into consideration in the development of the FRMPs. Similarly, the valuable information and experience obtained through the Community Resilience Pilot Project is recognised in the FRMPs and there is a clear commitment by the Department to extend this approach to other flood prone communities.
Freshwater Task Force/ Enagh Sustainable Development Forum/Holy Well Trust				
Institution of Civil Engineers (ICE)	✓			
PSNI	✓			
Mid and East Antrim Council	✓		Significant learning in relation to the power of community resilience has been captured following the 10 pilot projects recently completed. This learning should be used to further inform proposals in relation to preparedness for flood risk.	The valuable information and experience obtained through the Community Resilience Pilot Project is recognised in the FRMPs and there is a clear commitment by the Department to extend this approach to other flood prone communities.
NI Fire and Rescue Service	✓			
NI Housing Executive	✓			
NI Water	✓		Please also note that NI Water will progress an investment programme to address hydraulic capacity issues with its sewer networks.	Noted

Question 4: Do you agree with the proposed measures identified for each of the significant flood risk areas?

Respondent	Yes	No	Respondent Comments	Department's Response
Six Mile Water Trust also Antrim & District Angling Club	✓			
Ulster Farmers Union (UFU)	✓			

Question 5: What measures do you think should be given the highest priority to manage flood risk in your area?

Respondent	Yes	No	Respondent Comments	Department's Response
AFBI				
Antrim & Newtownabbey Borough Council			<p>It is important to ensure that all measures are pro-actively pursued consistently and routinely by all agencies with responsibility. Council recognises itself as a Flood Risk Management Organisation within Section 4.4., which outlines its own roles and functions (to now include Planning Control) involving:</p> <ol style="list-style-type: none"> 1. Adopting a precautionary approach to the 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, 2. Playing a key role in facilitating emergency response activities in relation to flooding, a leading role in the 'recovery phase' after a flooding event has occurred, and administering a scheme of practical assistance to those affected by flooding. <p>Council will be keen to receive regular updates on the delivery of the proposed protection measures (flood alleviation schemes) as they progress within the Borough.</p>	<p>The Department notes and recognises the important contribution that Council makes to the management of flood risk through for example:</p> <ul style="list-style-type: none"> • Emergency planning and community engagement; • Raising awareness of flood risk; • Administration of the Scheme of Emergency Financial Assistance (SEFA) and most importantly, • Its new responsibility for Development Planning. <p>The Department accepts that, given the new role for Councils in Development Planning, a process must be established to ensure that Councils are regularly updated in relation to the progress of flood studies and proposed schemes within their respective areas.</p>
Armagh City, Banbridge & Craigavon Council			<p>1 – Creating awareness of the risks especially for those who despite living and working in significant flood risk zones are oblivious to the risks either on their domestic or business premises.</p> <p>2 – All stakeholders should remind those at risk that ownership of the risks are universal. Historically government have solely been held to account. Anecdotal evidence following inconvenience</p>	<p>The Department agrees that creating awareness is a key priority when it comes to managing flood risk and it has taken major steps to ensure that those living and working in areas of known flood risk can access the most up to date flood hazard information through the Rivers Agency website on Flood Maps NI. In addition, appropriate flood warning and informing systems for communities located within flood prone areas continue to be developed by the Department and it is currently looking at options to make the information it holds on river levels available to the public through the internet.</p> <p>The Department understands the Council's concern in relation to the Inconvenience Payments paid by Government to homeowners affected by flooding. It recognises that this may be creating an unhealthy</p>

Question 5: What measures do you think should be given the highest priority to manage flood risk in your area?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>payments after flooding perhaps has not contributed to this ownership. Research on compensation theory within social sciences has called in to question the perception of risk if those exposed are to be compensated Perrow (1999; 179-180).</p> <p>3- The fact remains if we can expect more flooding events in the future we need to learn from national and international flood risk management schemes. Perhaps more referencing to national and international learning experiences would add justification to strategies.</p>	<p>preconception among homeowners that Government owns the flooding problem and as a consequence, many perceive that they have no personal responsibility to take action to mitigate the risk. The Department plans to introduce the Homeowner Flood Protection Grant Scheme in Autumn 2015 and this will hopefully begin to foster a change in attitude by demonstrating that homeowners can take positive action to substantially reduce the flood risk to their property.</p> <p>The Department is in regular contact with the various flood authorities in GB and Ireland and routinely shares information and knowledge in regard to flood risk management and to establish best practice in the area of flood risk management.</p> <p>In addition, the Department is an active participant in the EC's Working Group F. Through this group we work with our European partners to resolve shared technical challenges and establish a common understanding and approach to deliver the successful and effective implementation of the Floods Directive.</p>
Belfast City Council			<ul style="list-style-type: none"> 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 	<p>The Department believes that Planning NI effectively applied PPS15 - Planning and Flood Risk within its development planning decisions. It is also confident that, following the introduction of the two-tier planning system, the Council's planning department will work in cooperation with other stakeholders to develop a Local Development Plan for the regeneration of Belfast that take proper account of flood risk.</p> <p>Each of the hydraulic models for the rivers within the individual SFRAs (including Belfast) are catchment based and can be used to model the downstream effects of the inputs from all areas of the catchments. If BC Council needs information on any watercourses within its council area it should contact Rivers Agency's Mapping and Modelling Unit.</p> <p>Noted and agreed</p>

Question 5: What measures do you think should be given the highest priority to manage flood risk in your area?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>great interest to residents in Belfast as a large number have no identified physical scheme to reduce flooding in their area at this time.</p> <ul style="list-style-type: none"> • 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. 	<p>Noted and agreed</p> <p>Noted and agreed</p>
Carrickfergus Borough Council			Improving community resilience	The valuable information and experience obtained through the Community Resilience Flood Pilots is recognised in the FRMPs and there is a clear commitment by the Department to extend this approach to other flood prone communities.
Craigavon Borough Council			<ol style="list-style-type: none"> 1. Prevention is better than cure. Craigavon Borough Council welcomes the assertion that Rivers Agency will oppose any development within the Flood Plan and also revisit those areas shown to be at risk as a result of their recent surveys and predictions, even though those areas were not included in the Craigavon Area Plan 2010. This information will be vital in aiding the new Council to determine the development limits in the new Development Plan; 2. Immediate steps should be taken to ensure that lands 	<p>Rivers Agency has a long history of working closely with Planning NI to raise awareness of, and provide advice in relation to, flood risk. It assisted Planning NI with the production of PPS15 and its revisions, provides advice on individual planning applications and regularly gives presentations to their staff on how to use and interpret Rivers Agency's flood risk information. As a result of the new two-tier planning system Rivers Agency will work with Council planning departments to ensure that they have the skills and capacity necessary to take proper account of flood risk in execution of their development planning responsibilities.</p> <p>The Department has a planned maintenance programme to ensure that all</p>

Question 5: What measures do you think should be given the highest priority to manage flood risk in your area?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>adjacent to the River Bann; Ballybay River and other tributaries mentioned in the document, are adequately drained and to keep these under review to enable flood water to escape more readily in the event of heavy rain.</p> <p>Communication and Co-ordination. There should be one lead Agency or co-ordinating body to deal with Flood Management whatever the source, i.e. fluvial or drains.</p>	<p>designated watercourses within the Armagh, Banbridge and Craigavon District Council area are maintained to an appropriate standard.</p> <p>DARD is the Lead Government Department (LGD) in relation to the coordination of response to flood emergencies in Northern Ireland. This role is implemented by Rivers Agency because of its key responsibilities for flood risk management and land drainage and expert knowledge of the primary causes of flooding emergencies. Although, DARD/Rivers Agency's LGD role does not cover all of the defined Levels of Emergency there is a clearly defined pathway for the transfer of responsibility to others as the severity level of an emergency increases.</p> <p>Currently, flood emergencies in Northern Ireland are dealt with by one or more of 3 organisations known as the Flood Response Agencies (FRAs) – these are Rivers Agency (DARD), Transport NI (DRD) and NI Water (DRD). As all of these bodies will be joining the new Department of Infrastructure in the spring of 2016. It is anticipated that this will create opportunities for improved communication, coordination and effectiveness on cross cutting flood risk management issues.</p>
Fermanagh & Omagh District Council			<p>The measures outlined in the draft plan concentrate of prevention, protection and preparedness.</p> <p>In relation to preparedness, the interaction of DARD as the lead government Department for the co-ordination of flooding emergencies with local government as a key stakeholder needs to be embedded within the existing sub regional civil contingencies arrangements. This is of particular importance when responding to widespread events encompassing several council boundaries.</p> <p>Considering protection, the dissemination of £1000 inconvenience payments in the aftermath of flooding events should be closely linked to the improvement of flood protection for the specific property.</p>	<p>A review of Civil Contingencies Arrangements in Local Government in Northern Ireland is being undertaken. This will clarify the position in relation to the Department and Local Government with respect to preparedness.</p> <p>A Homeowners Flood Protection Grant Scheme is being introduced by the Department to address the problem of potential flooding on an individual property basis. The scheme is targeted at those properties which have flooded most frequently in the past and consequently, it is expected that the Scheme may be taken up mainly by homeowners who have received Inconvenience Payments in the past.</p> <p>The Department agrees that creating awareness is a key priority when it comes to managing flood risk and it has taken major steps to ensure that those living and working in areas of known flood risk can access the latest</p>

Question 5: What measures do you think should be given the highest priority to manage flood risk in your area?

Respondent	Yes	No	Respondent Comments	Department's Response
			Proactive communication with the public to create awareness of the risks especially for those who live and/or work in significant flood risk zones is also essential.	most up to date flood hazard information through the Rivers Agency website on Flood Maps NI. In addition, appropriate flood warning and informing systems for communities located within flood prone areas continue to be developed by the Department and it is currently looking at options to make the information it holds on river levels available to the public though the internet.
Freshwater Task Force/ Enagh Sustainable Development Forum/Holy Well Trust			<p>We urge Rivers Agency to guard against an over-reliance on hard engineering. Generally speaking, the FWTF supports flood management measures that make <i>space</i> for water, and would encourage that these spaces are natural/green in character (because of the multiple benefits associated with green space in terms of health and welling, resilience, recreation and public amenities, climate change impacts and adaptation, heritage importance – i.e. wider objectives of the Flood Risk Management Plans). SuDS are an opportunity to deliver these kinds of benefits on the ground (though we recognise that this is only part of the solution). In the context of making space for water, 'planning for exceedance' in the system is crucial, and should be manifested on the ground in all flood risk areas of NI.</p> <p>We note that the Floods Directive states that '<i>Key features of the EU Directive include... Promoting the use of natural flood risk management measures</i>'.</p>	Refer to Department's response to FWTF's comment at Question 2.
Institution of Civil Engineers (ICE)				
PSNI			A balanced assessment of the threat, risk and harm has been conducted.	The Department notes and welcomes the PSNI comment.
Mid and East Antrim Council			The measures outlined in the draft plan concentrate of prevention, protection and preparedness.	A review of Civil Contingencies Arrangements in Local Government in Northern Ireland is being undertaken. This will clarify the position in

Question 5: What measures do you think should be given the highest priority to manage flood risk in your area?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>In relation to preparedness, the role of DARD as the lead government Department for the co-ordination of flooding emergencies, with local government as a key stakeholder needs to be embedded within the existing sub regional civil contingencies arrangements. This is of particular importance when responding to widespread events encompassing several council boundaries.</p> <p>In relation to protection measures, consideration should be given to provision of central funding support for individual property protection for homes and businesses within flood risk areas. Recurrent flooding affects house values; this is outside a house owner's control and should not result in them being penalised.</p> <p>Proactive engagement with communities who live and/or work in significant flood risk zones is also key. Awareness raising in relation to extent and likelihood of risk, types of flood risk, protection measures and self-help activities are all effective in building understanding and hence resilience.</p>	<p>relation to the Department and local government with respect to preparedness.</p> <p>The Department plans to introduce the Homeowners Flood Protection Grant Scheme in the autumn 2015. Through the scheme Government shall provide homeowners with the technical and financial support necessary to make their homes more resistant to flooding. The scheme will be targeted towards those properties which have flooded in the past and are most likely to flood in the future.</p> <p>The Department agrees that creating awareness is a key priority when it comes to managing flood risk and it has taken major steps to ensure that those living and working in areas of known flood risk can access the latest most up to date flood hazard information through the Rivers Agency website on Flood Maps NI. In addition, appropriate flood warning and informing systems for communities located within flood prone areas continue to be developed by the Department and it is currently looking at options to make the information it holds on river levels available to the public through the internet.</p>
NI Fire and Rescue Service			<p>Of the measures outlined, "preparedness" is the one most relevant to NIFRS as a regional responding agency so it is key that we are involved, regionally and sub-regionally, in preparing for flood response through existing CCGNI structures. However, intervention of this type should be a last resort option so NIFRS would advocate the pursuance of prevention and protection measures as a key priority in reducing the risk of flooding. It is recognised that this requires a longer term view to be taken, in light of budgetary constraints and resource limitations, so where prevention and protection measures are not immediately viable, it is imperative that in areas of high risk, awareness among key stakeholders including, statutory agencies, members of the public and business community is raised with advice and support on how to respond to such incidents collectively.</p>	<p>The Department agrees that where it is cost beneficial and affordable, flood protection measures should be a high priority for the mitigation of flood risk within areas of potential significant risk. It also agrees on the importance of raising public awareness of flood risk and flood emergency planning/response.</p>

Question 5: What measures do you think should be given the highest priority to manage flood risk in your area?

Respondent	Yes	No	Respondent Comments	Department's Response
NI Housing Executive			For the Housing Executive, coastal flooding particularly in Belfast is the greatest risk of causing homelessness. The completion of the defences and alleviation works in the Sydenham area is a priority as is any increase of low defences in the docks area.	<p>The Department shares the NIHE's concern in relation to the risk of flooding to homes in the Sydenham area and is committed to the completion of the East Belfast Flood Alleviation Scheme as early as possible.</p> <p>Rivers Agency has commenced a feasibility study to develop a mitigation strategy for the areas vulnerable to tidal flood risk in Belfast. Any economically viable flood alleviation works identified through this study will be prioritised alongside all other competing schemes and shall be taken forward as appropriate when resources permit.</p>
NI Water			N/A as NI Water contributed to the development of the assessment process and are content that the plan is suitably prioritised.	The Department notes NI Water's comment.
Six Mile Water Trust also Antrim & District Angling Club			<p>1. Outlaw all development within 100m of a known flood plain.</p> <p>2. Make it compulsory for the use of SUDS and attenuation on all new development</p> <p>3. Upgrading of existing Storm and Sewage Systems</p> <p>4. Priority maintenance of storm drainage in high risk area's e.g. road gullies.</p>	<p>The Department considers that the application of PPS15 – Planning and Flood Risk will prevent inappropriate development within known flood risk areas. To extend this protection beyond the limits of known flood plains would serve no useful purpose and could stifle the regeneration of towns and cities.</p> <p>NIEA's Strategy for the Promotion of the use of SuDS within Northern Ireland was published in 2011. The aim of this strategy is to establish SuDS as the preferred approach for managing the storm water discharges which arise from the development of land. Although many of the recommendations within this strategy have been adopted, some work remains to be done to establish the full realisation of SuDS as a viable and routinely adopted solution to storm water management. The Department will revise the FRMPs to clearly describe the current position with SuDS and outline the ongoing work to promote and support their wider use</p> <p>Each of the authorities with a responsibility for drainage and sewerage infrastructure has a prioritised programme of works that takes appropriate consideration of flood risk.</p> <p>All authorities with drainage infrastructure have representatives that sit</p>

Question 5: What measures do you think should be given the highest priority to manage flood risk in your area?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>5. Clear flood action plans for those most at risk already, contacts / sand bags etc.</p>	<p>on a quarterly basis, with others including Council EPCOs, on the Flooding & Severe Weather Working Groups that have been established under the Sub Regional Emergency Preparedness Groups. Through these groups, historical flood data is used to identify flooding hotspots which are known to flood on a repeated basis. Having identified these hotspots, the authority responsible is identified and commits to mitigate the risk through appropriate affordable measures such as infrastructure improvements and/or increased maintenance of assets.</p> <p>A Community Resilience Pilot Project has been undertaken to engage with 10 communities at risk of flooding and involve them in the preparation of flood emergency plans. This work and a commitment to extend this to a further 20 communities is detailed in the FRMPs.</p>
Ulster Farmers Union (UFU)				

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?

Respondent	Yes	No	Respondent Comments	Department's Response
AFBI				
Antrim & Newtownabbey Borough Council	✓		<p>Council recognises that it is not possible to prevent or protect against all flooding, and that flooding response arrangements can become overstretched. In recognition of this fact, Council agree that Community resilience initiatives are an important element of being prepared and being ready to respond to flooding events, Council is supportive of proposals to engage with appropriate communities on a multi-agency basis.</p> <p>From a regional priority list of 20, three areas are identified within the Borough. Council is keen to engage further with the assessors in order to ensure that this indicative list is sound and the most suitable communities are identified for subsequent engagement. A review of the Potential Adverse Consequences Tables within the plans for the 3 SFRAs indicate other areas where a similar or a greater number of properties could be affected; e.g. the Concrete Row Stream and the Greenisland stream in Newtownabbey.</p>	<p>The Department would welcome further discussions with Council to ensure that we identify and engage effectively with all local flood prone communities that would be interested in increasing their resilience to flooding through the development of local community emergency plans.</p> <p>With regard to the Concrete Row Stream, we can advise that the design of a flood alleviation scheme for this watercourse is well advanced and construction works are programmed to commence in 2016/17. A feasibility study to determine if a flood alleviation scheme for the Greenisland Stream is economically viable, is well advanced and we anticipate that the outcome of this study will be known by December 2015. Therefore, as we may be in a position to deliver permanent solutions to the predicted flooding from these watercourses within the next few years, the establishment of local community resilience groups within the areas adversely affected may not be necessary.</p>
Armagh City, Banbridge & Craigavon Council	✓		<p>The reform of Local Government aims to place some of the decision making at local community level. These arrangements should focus on the risks associated to local communities regarding flooding. Some pilot schemes have been completed with mixed results, however consistency of approach all sectors in NI flood risk zones is key but conversely, agencies do need to be mindful of the trends which have presented during the pilot experiences.</p> <p>What is apparent is the rapid fade of risk as time passes following a flood event. Hence the immediate period after flooding possibly remains the best time to impress stakeholders of the risks. This was evident during the Fintona flooding event in 2014 which occurred one to two weeks prior to the Fintona Community Flood Pilot. Such real life examples will provide the most qualitative evidence regarding risk perception and community involvement.</p>	<p>The Department agrees that engagement with local communities in regard to the establishment of community resilience groups is likely to be most effective in the immediate aftermath of a flood and that this is an area where Councils have an important community support and engagement role to play.</p>

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?

Respondent	Yes	No	Respondent Comments	Department's Response
Belfast City Council	✓		<ul style="list-style-type: none"> • 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. 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 Sustainable Drainage Solutions (SuDS), alongside traditional drainage methods, to help alleviate flooding. There is potential for the Council to work with the Storm Water Management Group, the Rivers Agency and others to develop a green infrastructure plan for the brownfield sites in the city. 	<p>The Department notes and recognises the important contribution that Council makes to the management of flood risk through for example:</p> <ul style="list-style-type: none"> • Emergency planning and community engagement; • Raising awareness of flood risk, and • Administration of the Scheme of Emergency Financial Assistance; • Development planning.
Carrickfergus Borough Council	✓		Consulting with communities in high risk areas regarding building their resilience.	The Department notes and recognises the important contribution that Councils make to the management of flood risk through their role in Emergency Planning and community engagement and raising awareness

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?

Respondent	Yes	No	Respondent Comments	Department's Response
				of flood risk.
Craigavon Borough Council	✓		<p>Improved community engagement. Liaison should be undertaken with locals who know the areas impacted by flooding, many of whom have lived there for many years and can detect subtle changes in the 'nature' and 'character' of the Rivers which give rise to floods. Such liaison should also be undertaken with residents and business owners in areas affected by flooding to advise on measures which can be taken to protect their properties.</p> <p>Whilst payments of £1k should continue to be made to homes affected by flooding, it is considered that more emphasis should be placed on advising homeowners in previously and potentially affected areas of the benefits of acquiring covers for air vent bricks and proper door guards as opposed to sandbags etc.</p>	<p>A Community Resilience Pilot Project has been undertaken to engage with 10 communities at risk of flooding and involve them in the preparation of flood emergency plans. This work and a commitment to extend this to a further 20 communities is detailed in the FRMPs.</p> <p>The Department plans to introduce the Homeowners Flood Protection Grant Scheme in the autumn 2015. This Grant Scheme will enable Government to provide homeowners with the technical and financial support necessary to make their homes more resistant to flooding. The Scheme will be targeted towards those properties which have flooded in the past and are most likely to flood in the future.</p>
Fermanagh & Omagh District Council	✓		<p>The reform of Local Government aims to place some of the decision making at local community level. These arrangements should focus on the risks associated to local communities regarding flooding and therefore allowing communities to proactively protect their households and communities. Some pilot schemes have been completed across Northern Ireland and this pilot should be mainstreamed as it bodes well with the concept of community planning. Consistency of approach across all relevant organisations is essential, ensuring that communities can avail of similar services irrespective of where their property is located. This work, delivered via the regional community resilience group has been extremely useful in avoiding duplicating of effort across local government and central government. However, such work needs resourcing capacity.</p> <p>The perception of risk decreases with time following a flood event. Hence the immediate period after flooding possibly remains the best time to impress stakeholders of the risks. This was evident during the Fintona flooding event in 2014 which occurred one to two weeks prior to the Fintona Community Flood pilot. Such real life examples</p>	<p>The valuable information and experience obtained through the Community Resilience Pilot project is recognised in the FRMPs and there is a clear commitment by the Department to extend this approach to other 20 flood prone communities.</p> <p>The Department agrees that engagement with local communities in regard to the establishment of community resilience groups is likely to be most effective in the immediate aftermath of a flood and that this is an area where Council can play an important part.</p>

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?

Respondent	Yes	No	Respondent Comments	Department's Response
			will provide the most qualitative evidence regarding risk perception and community involvement. Therefore the need to integrate community engagement in both the preparedness and the recovery phases of flooding is important.	
Freshwater Task Force/ Enagh Sustainable Development Forum/Holy Well Trust			<p>The FWTF can work in partnership with government as 'knowledge brokers' to convey key messages in understandable ways and raise awareness of flood risk and a spectrum of management approaches. Another way to disseminate knowledge is through, for example, angling clubs operating in different areas across NI.</p> <p>Community involvement should be encouraged – it fosters openness, transparency and key stakeholder feedback, which is likely to make the development and implementation of flood planning and response more effective.</p>	<p>The Department has benefitted from the input of the Fresh Water Task Force on many occasions in the past and welcomes its continued involvement as a key stakeholder in matters relating to the water environment.</p> <p>The Department agrees that the involvement of local communities in managing flood risk is essential. A Community Resilience Pilot Project has been undertaken to engage with 10 communities at risk of flooding and involve them in the preparation of flood emergency plans. This work and a commitment to extend this to a further 20 communities is detailed in the FRMPs.</p>
Institution of Civil Engineers (ICE)	✓		Promotion of flood risk to public.	<p>The Department agrees that creating awareness is a key priority when it comes to managing flood risk and it has taken major steps to ensure that those living and working in areas of known flood risk can access the latest most up to date flood hazard information through the Rivers Agency website on Flood Maps NI. In addition, appropriate flood warning and informing systems for communities located within flood prone areas continue to be developed by the Department and it is currently looking at options to make the information it holds on river levels available to the public through the internet. It also believes that the active involvement of local communities in managing flood risk is essential. A Community Resilience Pilot Project has been undertaken to engage with 10 communities at risk of flooding and involve them in the preparation of flood emergency plans. This work and a commitment to extend this to a further 20 communities is detailed in the FRMPs.</p>

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?

Respondent	Yes	No	Respondent Comments	Department's Response
PSNI	✓		PSNI liaises closely with multi-agency partners to prepare for major incidents.	The Department recognises the important role that PSNI plays in flood emergency planning/response.
Mid and East Antrim Council	✓		<p>The new Community Planning powers afforded to Councils provide the foundation stones for contributing to flood risk management. Councils are therefore uniquely positioned to engage with communities through this process to identify local concerns and work with all the relevant stakeholders in planning for flood risk. Multi agency, community resilience pilot schemes have recently been completed across Northern Ireland; the two pilots in the Northern area were Broughshane village and Ahoghill. These community projects proved very successful and should be extended to further at risk areas to harness the power of engaged communities as an integral part of the community planning process.</p> <p>However, as the pilots demonstrated, such work is resource intensive and requires a strong lead from Council coupled with firm and effective commitment from all the stakeholders if such initiatives are to be successful.</p> <p>In recent years Multi-agency meetings and workshops had been held at local level in Ballymena Borough Council area and proved beneficial. Attendees included the following - Elected Members, MP for the area and North Antrim MLAs, NI Water, Rivers Agency, Roads Service, Planning Service, NIFRS, Council Chief Executive and Council Officers.</p> <p>Local resident groups should also be included in meetings and workshops.</p>	The Department recognises the important contribution that Councils make in the management of flood risk and in particular the pivotal role that they play in engaging with local flood prone communities. The valuable information and experience obtained through the Community Resilience Pilot Project is recognised in the FRMPs and there is a clear commitment by the Department to extend this approach to other flood prone communities.
NI Fire and Rescue Service	✓		The Fire and Rescue Services (Emergencies) Order (Northern Ireland) 2011 places a statutory responsibility upon NIFRS to respond to serious flooding incidents including rescuing people trapped, or likely to become trapped, by water and protecting them from	The Department recognises the NIFRS's high level of commitment in regard to flood emergency planning and response.

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?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>serious harm.</p> <p>As a result of this NIFRS has undertaken a process of enhancing its ability to respond to serious flooding through the provision of enhanced training, PPE and equipment provision on a number of strategically located stations in Belfast, Derry/Londonderry and Omagh, with potential for this to be expanded to Armagh and Enniskillen. NIFRS has adopted national best practice through its commitment to comply with the DEFRA "Flood Rescue Concept of Operations" document, all of which will greatly enhance our preparedness.</p> <p>In addition, NIFRS may be able to utilise the information from the FRMPs to better predict the consequences of flooding in the higher risk areas to inform its flood emergency planning response strategy and training of personnel. NIFRS also gathers and stores risk critical information on certain high risk sites across Northern Ireland. The FRMPs and associated mapping and flood modelling tools outputs may be able to be integrated into that system and made available to personnel on operational appliances which are fitted with mobile data terminals (MDTs).</p> <p>NIFRS will participate, where possible, in joint training and exercise delivery. Such activities need to incorporate Strategic; Tactical and Operational functions across all responder agencies for the response phase but the impact of budgetary constraints, as identified in Section 9, may have a detrimental effect on the ability to deliver this for numerous agencies. We will also continue to engage with voluntary flood response agencies within existing DOJ guidelines.</p> <p>NIFRS is also represented on Chief Fire Officer's Association (CFOA) national and regional UK flood and water rescue groups. We will continue to engage on these forums to ensure the sharing and adoption of best practice and lessons learned from flood events.</p>	
NI Housing Executive	✓		Development of Community Resilience is the key to helping our timely responses to any flooding incident. System of warning/ informing communities and a structure among communities of helping vulnerable persons and commencing defence/ preventative actions early will help defend against water entering dwellings.	The Department agrees that creating awareness is a key priority when it comes to managing flood risk and it has taken major steps to ensure that those living and working in areas of known flood risk can access the latest most up to date flood hazard information through the Rivers Agency website on Flood Maps NI. In addition, appropriate flood warning and

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?

Respondent	Yes	No	Respondent Comments	Department's Response
			The Housing Executive has contact with a large number of community groups covering where their dwellings are located and will support the development of resilience where it can.	informing systems for communities located within flood prone areas continue to be developed by the Department and it is currently looking at options to make the information it holds on river levels available to the public through the internet. It also believes that the active involvement of local communities in managing flood risk is essential. A Community Resilience Pilot Project has been undertaken to engage with 10 communities at risk of flooding and involve them in the preparation of flood emergency plans. This work and a commitment to extend this to a further 20 communities is detailed in the FRMPs. The Department recognises the important role that NIHE can play in relation to community engagement.
NI Water	✓		NI Water will continue to support joint approaches to reducing flooding risk working with other drainage agencies as required. NI Water will continue to advance storm water separation which will assist in reducing property flood risk. NI Water will also continue to promote Sustainable Drainage Systems.	The Department notes NI Water's continuing and important commitment to flood risk management.
Six Mile Water Trust also Antrim & District Angling Club	✓		Flood risk area's should be encouraged to set up their own community flood action groups and given professional advice on best way to protect their properties. Establish early flood warning systems to those at risk.	Community involvement in flood emergency preparedness is a key measure within the FRMPs. The Regional Community Resilience Group, which was established in 2013, co-ordinates the self-help activities for a number of communities at risk of flooding. This includes the pre-deployment of sand bags at areas known to flood and the use, where appropriate, of river level text alerts. There is commitment in the FRMPs to offer this assistance to a further twenty communities that have been identified through a vulnerability assessment. The Department agrees that creating awareness of flooding is a key priority when it comes to managing flood risk and it has taken major steps to ensure that those living and working in areas of known flood risk can access the latest most up to date flood hazard information through the Rivers Agency website on Flood Maps NI. In addition, appropriate flood warning and informing systems for communities located within flood prone areas continue to be developed by the Department and it is currently looking at options to make the information it holds on river

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?

Respondent	Yes	No	Respondent Comments	Department's Response
				levels available to the public through the internet.
Ulster Farmers Union (UFU)	✓		The farming community recognises the importance of effective and sustainable flood risk management as flooding on agricultural land can have significant and lasting implications for a farmer's livelihood. Working in catchment basin management partnerships is something that the UFU feel is a very effective way of contributing to these management plans.	The Department notes and agrees with the UFU position in regard to the importance of adopting a sustainable flood risk management approach.

Question 7: Are there things you think should be done to improve the co-ordination of flood risk management planning?

Respondent	Yes	No	Respondent Comments	Department's Response
AFBI			See comment on environmental report.	Noted.
Antrim & Newtownabbey Borough Council	✓		<p>It is important that there is regular multi-agency engagement providing momentum and progress updates on the actions taken to deliver the measures within the Flood Risk Management Plan.</p> <p>It is noted that progress on the implementation of the Plans will be reported on an annual basis to the European Commission.</p> <p>Council would welcome similar progress reports specific to the Antrim and Newtownabbey Borough.</p>	<p>The Department notes and agrees that the effective delivery of the planned measures can only be secured through a coordinated multi-agency approach to flood risk management.</p> <p>All information reported to the European Commission in relation to the progress on implementing the FRMPs will be publicly available. However, the Department is willing to report progress on implementation of the FRMPs to the Council as and when requested.</p>
Armagh City, Banbridge & Craigavon Council	✓		<p>1- The current model for multiagency resilience during emergencies and crises is served by the Sub-regional Emergency Preparedness Groups (SEPGs). These multiagency groups have demonstrated their interoperability and resource capability during numerous flooding and other events in NI – see PEDU (2012;48). PITT (2008) DARD (2014;35;492). Consolidation and adequate resourcing of these structures and in particular the roles of Emergency Planning Co-Ordination Officers (EPCOs) within is vital if greater resilience is to be achieved and maintained. Indeed this draft report highlights the vital component: “The role of Local Government Emergency Planning Co-ordination Officers (EPCOs) is essential in implementing this element of preparedness activities DARD (2014:492)</p> <p>2- The role of elected members, many of whom with specific local knowledge is essential to support those members of the SEPGs both in planning and during the response phases of flooding events. Recent flooding events in both Newry and Portadown in November 2014 and in Fermanagh in 2010 benefited from the involvement of elected members. Elected members have participated in the Flood Risk Forums. The networking and multiagency interaction present at these event have proved of use and should be consolidated.</p>	<p>The Department recognises the important role that Councils and the EPCOs play in the preparedness activities that are vital components of the flood risk management planning process.</p> <p>The Department recognises the important role that elected members can play in both the planning and response phases for flood emergencies. The Department also recognises the positive contribution made by the elected members that have attended the Local Flood Forums that helped shape the FRMPs. It is committed to ensuring that there will continue to be opportunities for elected members to reflect the concerns and views of local communities within the flood risk management planning process.</p>

Question 7: Are there things you think should be done to improve the co-ordination of flood risk management planning?

Respondent	Yes	No	Respondent Comments	Department's Response
Belfast City Council	✓		<ul style="list-style-type: none"> • 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 	<p>The FRMPs will be revised to reflect the recently introduced two-tier arrangements for the development planning system and in relation to the opportunities that may be created by the formation of the new Department for Infrastructure in 2016. There are, and will continue to be, effective channels of communication with all planning departments to ensure flood risk is properly considered in all development decisions.</p> <p>The Department believes that the Floods Directive Consultation Network has served it well and has assisted it to meet all of the requirements of the Directive within the challenging deadlines prescribed by the EC. However, the Department is minded to review the future arrangements for consultation and engagement when we pass the end date for the first Plan cycle in December 2015. There is every prospect that the consultation network could be rationalised as we now have an established process to follow for the second Plan cycle. Any proposed changes to the consultation network will be put to the Floods Directive Steering Group for its approval and DOE and local government representatives on the group will have an opportunity to influence the outcome.</p> <p>The Department expects that the Executive decision to move Rivers Agency (DARD), Transport NI (DRD) and NI Water (DRD) into the new Department of Infrastructure in the spring of 2016 will improve coordination on the cross cutting flood risk management issues and create greater opportunities for joint funded solutions.</p>

Question 7: Are there things you think should be done to improve the co-ordination of flood risk management planning?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>of all relevant agencies and the application of joint funded projects where these are the most economical and suitable approach.</p> <ul style="list-style-type: none"> 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. 	<p>The Department will consider publishing on its website, its capital works programme for flood alleviation schemes and information to show the status of the feasibility and design studies that are being undertaken in connection with known flooding problems.</p>
Carrickfergus Borough Council		✓		
Craigavon Borough Council	✓		<p>See response to Question 5 above, i.e. the concept of having one Lead Agency or Co-ordinating body, which will meet more regularly than 1 or 2 times per annum with Council and other emergency responders to ensure that good working relationships can be established which can be relied upon in the event of a flooding incident arising.</p> <p>The introduction of a Flood Incident Helpline which can assist at the earliest signs of water levels rising as opposed to the responder advising that action can only be taken if water has entered a dwelling.</p>	<p>The Department expects that the Executive decision to move Rivers Agency (DARD), Transport NI (DRD) and NI Water (DRD) into the new Department of Infrastructure in the spring of 2016 will improve coordination on the cross cutting flood risk management issues and create greater opportunities for more joint funded solutions.</p> <p>A new "Report a Flood" service is currently being developed to enhance the services currently available through the existing Flood Incident Line to deliver a new improved flood reporting service for Northern Ireland. This new service will increase the service channels available to the public for reporting floods by adding online and mobile reporting capability. It will also create a live interactive map to display a common operational picture of flood calls and other relevant data which will be accessible via the web on computers and other mobile devices. The system may enable information to be uploaded to NI Direct website so that the public can view the current status of reported floods.</p>
Fermanagh & Omagh District Council	✓		<p>The current model for multiagency resilience for planning and responding to emergencies is served via the sub-regional Emergency Preparedness Groups (EPG's). These multiagency groups have demonstrated their interoperability and resource capability during numerous flooding and other events in NI. Consolidation and adequate resourcing of these structures are vital if continued</p>	<p>The Department acknowledges the importance of the sub-regional Emergency Preparedness Groups in delivering a multi-agency approach to the preparedness activities that are a vital component of the flood risk management planning process. It accepts that the effectiveness of these groups can only be assured through adequate resourcing.</p>

Question 7: Are there things you think should be done to improve the co-ordination of flood risk management planning?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>resilience is to be achieved and maintained and to allow for the facilitation of an effective multi-agency response.</p> <p>The role of elected members, many of whom have specific local knowledge is important when considering local risks. Elected members have participated in the Flood Risk Forums. The networking and multiagency interaction present at these events have proved of use and should continue.</p>	<p>The Department recognises the important role that elected members can play in both the planning and response phases for flood emergencies. The Department also recognises the positive contribution made by the elected members that have attended the Local Flood Forums that helped shape the FRMPs. It is committed to ensuring that there will continue to be opportunities for elected members to reflect the concerns and views of local communities within the flood risk management process.</p>
Freshwater Task Force/ Enagh Sustainable Development Forum/Holy Well Trust			<p>The review of these plans and strategies should continue to be coordinated to ensure more effective and efficient management of the NI water environment. Review periods should be used to determine how to make change, where it is required, and identify solutions to problems encountered throughout the delivery of the proposed programme. It is important that the Plans stay in line with European Directives (which they currently show good awareness of). Crucially, we would also like to see plans and policies relating to the water environment (particularly the priorities detailed in the NI Long Term Water Strategy, 'Sustainable Water') reflected in the next NI Programme for Government.</p> <p>We would like to see Flood Risk Management Plan areas mapping onto, for example, Catchment Stakeholder Groups, areas as established under the Water Framework Directive River Basin Management Plan process. This would encourage public engagement around the Floods Directive process, building upon structures that already exist.</p>	<p>The Department, through Rivers Agency, plays an active role on the Water Framework Directive Steering Group, the Implementation Group and the various Stakeholder Groups. Similarly NIEA has input to the implementation of Floods Directive. The Department and NIEA will continue to work closely together to ensure that the successful implementation of both Directives. The Department has contributed to the DRD's Long Term Water Strategy (LTWS) which sets out Government's vision for a sustainable water sector. It will assist in the development of the Strategy Implementation Plan for the LTWS to ensure that it fulfils its commitment to the stated aims, particularly in relation to '<i>Flood Risk Management and Drainage</i>'.</p> <p>The Department believes that its Floods Directive Consultation Network has served it well and has assisted it to meet all of the requirements of the Directive within the challenging deadlines prescribed by the EC. However, the Department is minded to review the future arrangements for consultation and engagement when we pass the end date for the first plan cycle in December 2015. There is every prospect that the consultation network could be rationalised as we now have an established process to follow for the second plan cycle. The suggested merging of the Floods Directive's - Local Flood Forums and the WFD's – Catchment Stakeholder Groups is something that the Department will consider in conjunction with colleagues in NIEA.</p>
Institution of Civil Engineers (ICE)		✓		

Question 7: Are there things you think should be done to improve the co-ordination of flood risk management planning?

Respondent	Yes	No	Respondent Comments	Department's Response
PSNI		✓	Content that measures to address this are being taken	
Mid and East Antrim Council	✓		<p>The current model for multiagency resilience for planning and responding to emergencies is served via the sub-regional Emergency Preparedness Groups (EPG's). These multiagency groups have demonstrated their interoperability and resource capability during numerous flooding and other events in NI. Consolidation and adequate resourcing of these structures are vital if continued resilience is to be achieved and maintained and to allow for the facilitation of an effective multi-agency response.</p> <p>The role of elected members, many of whom have specific local knowledge is important when considering local risks. Elected members have participated in the Flood Risk Forums. The networking and multiagency interaction present at these events have proved of use and should continue.</p>	<p>The Department recognises the important role that Councils and the EPCOs play in the preparedness activities that are a vital component of the flood risk management planning process.</p> <p>The Department recognises the important role that elected members can play in both the planning and response phases for flood emergencies. The Department also recognises the positive contribution made by the elected members that have attended the Local Flood Forums that helped shape the FRMPs. It is committed to ensuring that there will continue to be opportunities for elected members and others to reflect the concerns and views of local communities within the flood risk management planning process.</p>
NI Fire and Rescue Service	✓		<p>The final FRMPs should be linked via the SCEPG to the EPGs and IDG for highlighting areas of risk for the production of flood response plans by the Flooding and Severe Weather groups where needed. It is important that the subsequent plans are communicated to all stakeholders and that they are communicated sub-regionally to responders, incorporated into their internal planning arrangements and exercised accordingly. Perhaps FSSG could play a co-ordinating role in ensuring this happens at the appropriate organisational level but it is essential that EPCOs continue to be utilised at sub-regional level to co-ordinate the production of these plans. The threat of losing the EPCO role should not be underestimated as it would have a negative impact on a wide range of emergency management issues.</p> <p>Annex G makes reference to cross-border co-operation but the river basins are only mapped in NI. Work is currently ongoing through a</p>	<p>The Department would comment that FRMPs are high level Plans which primarily relate to the 20 most Significant Flood Risk Areas. The Department's Flood Mapping, which is used in the preparation of the FRMPs, is also being used extensively by the EPGs in the production of more detailed, site specific emergency response plans for each EPG area. The Department expects the EPGs to ensure that stakeholders fully input to those plans and, coordinate with partner organisations, so that plans are fully communicated and tested through exercising. The Department would not expect FSSG to have a co-ordinating role here. The Department supports the roles of EPCOs in Emergency Planning and their continuation under local government reform.</p> <p>The Office of Public works (OPW) in the Republic of Ireland has developed detailed flood hazard and risk maps for all the areas of potential</p>

Question 7: Are there things you think should be done to improve the co-ordination of flood risk management planning?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>Cross Border Emergency Management Group to develop a cross border information sharing and mapping platform so consideration could be given to expanding the flood mapping along the "border necklace" which would enhance planning arrangements with the potential to improve the availability of mutual aid provision in both directions.</p> <p>It is also essential that appropriate data sharing agreements are adopted to ensure that vulnerable people identified within the flood risk areas can be prioritised for response action, either through community based initiatives via RCRG or by the appropriate statutory agency during a response phase.</p>	<p>significant flood risk for their jurisdiction. The Department works very closely with OPW on areas of common interest to ensure the effective implementation of the Floods Directive. Therefore, if the Cross Border Emergency Group decides to establish an information sharing and mapping platform that contains the detailed flood mapping along both sides of a 'border necklace', this is something that the Department could input into along with OPW.</p> <p>The comment is noted. The issues of Vulnerable People and the sharing of data during emergencies are being taken forward by Spatial NI. It is understood that matters are being resolved through a Vulnerable Persons Protocol.</p>
NI Housing Executive	✓		<p>We have to acknowledge that the short river systems we have generally do not provide much time to provide alerts. The warnings relayed directly to the groups are the best approach, but are dependent on someone locally being willing to accept the responsibility.</p> <p>Our biggest problem over the past 7 to 8 years has been flash flooding caused by downpours of exceptionally heavy rain over a relatively short time. Where this will hit is very unpredictable, but with development of new forecasting models, the Met Office information and access to their Hazard Manager system does help give pointers to where this may be likely to occur.</p>	<p>The Department agrees that creating awareness of flooding is a key priority when it comes to managing flood risk and it has taken major steps to ensure that those living and working in areas of known flood risk can access the latest most up to date flood hazard information through the Rivers Agency website on Flood Maps NI. In addition, appropriate flood warning and informing systems for communities located within flood prone areas continue to be developed by the Department and it is currently looking at options to make the information it holds on river levels available to the public through the internet. The Department agrees that the Met Office's Hazard Manager system can be very useful for the short term forecasting of the high intensity, short duration rainfall events that often occur during the summer months.</p>
NI Water		✓		
Six Mile Water Trust also Antrim & District Angling Club	✓		<p>Clear Legislation.</p> <p>From what is already known: a total ban on any development within 100m of a known flood plain limit .</p> <p>No development within a" formulated" distance of any stream or river using existing flows, width, height datum's etc. as a means of developing a workable formula to establish safe distances. This</p>	<p>As stated previously in the Department's response to the SMWT/A&DAC comment on Question 5, the Department considers that the application of PPS15 – Planning and Flood risk has effectively prevented inappropriate development within known flood risk areas. To extend this protection beyond the limits of known flood plains would serve no useful purpose</p>

Question 7: Are there things you think should be done to improve the co-ordination of flood risk management planning?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>would drastically reduce the risk to existing and any new development and would give developers clear parameters to develop.</p> <p>All property should be sold with "Flood Risk "report, similar to and "EPC"</p>	<p>and could stifle the regeneration of our towns and cities.</p> <p>The Department understands that it is normal practice for solicitors involved in property conveyance to provide their clients with such information as is necessary to allow them to determine the terms on which buildings cover insurance, including flood risk, is available prior to their entering into contractual commitments. This process is very simple, as a general assessment of flood risk to individual properties can be obtained through the use of the Rivers Agency's flood maps which are available to the general public through the Flood Maps NI website.</p>
Ulster Farmers Union (UFU)		✓		

Question 8: Do you agree with the conclusions of the environmental assessment?

Respondent	Yes	No	Respondent Comments	Department's Response
AFBI			<p>For such major exercise, there could justifiably have been reference to non "priority" species of fish in rivers (i.e. those not specifically listed by EU or EU driven legislation), the need for river continuity to join up in-river habitats, and the potential for added value when projects/schemes to alleviate flooding are being considered. These are all conspicuous by minimal reference or absence. Within reference to the Water Framework Directive, the main criterion for compliance applied is only that flood protection activity should not result in a water body being reduced in class. (Strategic Environmental assessment, P151</p> <p>Given the excellent work that Rivers Agency can do and are doing alongside the likes of the Connswater scheme, and working with fisheries officers to consider river habitat enhancement works where flood prevention works are actioned, the minimal mention of opportunity for works like these, which are often at little or no additional cost, is disappointing.</p>	<p>Freshwater fisheries are included in the bio-diversity assessment of flora and fauna at a strategic level. The FRMPs do not address site specific measures due to their strategic nature. However all planned flood alleviation works are subject to the Drainage (Environmental Impact Assessment) Regulations (Northern Ireland) 2006. This legislation requires the Agency to consider the effects on the environment of all proposed works. The Department fully complies with the requirements of these regulations which ensure that all proposed schemes are widely publicised, that all stakeholders, including the general public, are given an opportunity to forward their opinion on the scheme and its likely effects. Where there is a determination that the scheme it is likely to have significant environmental effects, an environmental statement is prepared by the Department for public consultation. On the basis of the representations received through the consultation on the environmental statement, the Department will determine if a scheme shall proceed in whole, or in part, with whatever measures are necessary to '<i>avoid, reduce and if possible, remedy significant adverse effects</i>'.</p> <p>In addition, the Department, in the design of its proposed flood alleviation schemes, actively seeks to enhance the environment and works in cooperation with colleagues in DCAL Inland Fisheries and Loughs Agency to identify opportunities to protect and enhance fisheries. An example of the benefits of this approach can be seen in the recently completed Coleraine-Lodge Burn Flood Alleviation Scheme where fish "pass ability" was successfully addressed.</p>
Antrim & Newtownabbey Borough Council	----	----	No comment	
Armagh City, Banbridge & Craigavon Council	✓			

Question 8: Do you agree with the conclusions of the environmental assessment?

Respondent	Yes	No	Respondent Comments	Department's Response
Belfast City Council	✓			
Carrickfergus Borough Council	✓			
Craigavon Borough Council	✓			
Fermanagh & Omagh District Council	✓			
Freshwater Task Force/ Enagh Sustainable Development Forum/Holy Well Trust				
Institution of Civil Engineers (ICE)	✓			
PSNI	✓			
Mid and East Antrim Council	✓			
NI Fire and Rescue Service	✓			
NI Housing Executive	✓			

Question 8: Do you agree with the conclusions of the environmental assessment?

Respondent	Yes	No	Respondent Comments	Department's Response
NI Water	✓			
Six Mile Water Trust also Antrim & District Angling Club		✓	We do not believe that sufficient thought has been given to the flora, fauna and natural environment when it comes to flood prevention measures. The canalisation of rivers and streams has dramatic effects on the fish and aquatic life of the system with little or no effect on flood risk reduction. The clearing of bankside vegetation , trees etc. gives no consideration to the wildlife that depend on the river corridors as essential to their existence and well being .	<p>All capital works proposed by the Department are subject to an Environmental Impact Assessment (EIA) procedure as set out in the Drainage (Environmental Impact Assessment) Regulations (NI) 2006. This includes a comprehensive assessment process of potential impacts, consultation and opportunities for mitigatory or enhancement works in line with local, national or EC environmental strategies and directives.</p> <p>The EIA process is a statutory requirement for any new works proposed by Rivers Agency. The process sets out a number of criteria which must be considered as part of a wider assessment of potential impact. These criteria include natural and built heritage aspects, landscape, human beings and disturbance amongst others. The process also requires consultation with stakeholders and an assessment of the cumulative effect of impacts. Rivers Agency has developed the process to include aspects of biodiversity, sustainability and habitat, and to include mitigatory and enhancement measures, particularly where these can link with other directives and strategies. The EIA process has been reviewed recently to widen the range of areas of concern and to encourage wider thinking of options and works which may generate multiple benefits. The use of this process is exemplified by the recently completed Coleraine-Lodge Burn scheme, where significant benefits to fish passage and WFD objectives were achieved through careful design of the flood alleviation scheme.</p> <p>Maintenance works are also subject to environmental assessment under the same legislation and there is associated ongoing consultation with statutory fisheries groups and the NIEA.</p>
Ulster Farmers Union (UFU)	✓		The UFU are encouraged by the finding that there is the potential for multi-directive benefits through the use of synergistic works, on a partnership basis. This way of working is, in our opinion, the most effective and sustainable way of managing catchment basins and flood risk.	The Department notes and agrees with the UFU's comments in regard to the importance of managing flood risk through a partnership approach at the catchment scale.

Question 9: Are there any further significant environmental effects of the draft plan which you think should be considered?

Respondent	Yes	No	Respondent Comments	Department's Response
AFBI				
Antrim & Newtownabbey Borough Council	----	----	No comment	
Antrim & District Angling Club				
Armagh City, Banbridge & Craigavon Council		✓		
Belfast City Council		✓		
Carrickfergus Borough Council		✓		

Question 9: Are there any further significant environmental effects of the draft plan which you think should be considered?

Respondent	Yes	No	Respondent Comments	Department's Response
Craigavon Borough Council		✓		
Fermanagh & Omagh District Council		✓		
Freshwater Task Force/ Enagh Sustainable Development Forum/Holy Well Trust				
Institution of Civil Engineers (ICE)		✓		
PSNI		✓		
Mid and East Antrim Council		✓		
NI Fire and Rescue Service		✓		
NI Housing Executive		✓		
NI Water		✓		
Six Mile Water Trust also Antrim & District Angling Club	✓		Lough Neagh SPA, is dependent on the water quality it receives from the feeder streams that flow into it. The pollution risks that arise from outdated sewage systems during flood will have an impact on the quality of Lough Neagh, and our drinking water source.	Pollution of the Lough Neagh SPA is specifically addressed through the River Basin Management Plan for the Neagh Bann International River Basin District. The Programme of Measures to reduce diffuse and point source pollution from sewerage and industry is available via the NI Environment Agency's website via

Question 9: Are there any further significant environmental effects of the draft plan which you think should be considered?

Respondent	Yes	No	Respondent Comments	Department's Response
				<p>the following link http://www.doeni.gov.uk/niea/diffuse-sewage.pdf Point source discharges are regulated through the process of licensing consents under the Water Order (Northern Ireland) 1999, and all consents are currently being reviewed to ensure that the consent conditions are compliant with the objectives of the Water Framework Directive.</p> <p>Waste water treatment works and sewerage networks are prioritised for investment based on their performance under the Northern Ireland Water Capital Investment Programme known as the Price Control Process. This process aims to ensure compliance with the conditions of Water Order Consents and other Directives. It also helps to identify sewerage assets which are overloaded and discharges which are impacting or have the potential to impact on the status of a water body. The most significant polluting discharges are prioritised and solutions identified and implemented to reduce the polluting effects on the water environment.</p> <p>Northern Ireland Water invested £840 million to upgrade sewerage infrastructure from 2010 to 2013. As part of the current Price Control process (2013 to 2015) 38 wastewater treatment works and 84 intermittent discharges will be upgraded. A further investment of £990 million is planned for the next investment period 2015 to 2021.</p>
Ulster Farmers Union (UFU)		✓		

Question 10: Are there further mitigations or opportunities that should be considered for the plan?

Respondent	Yes	No	Respondent Comments	Department's Response
AFBI				
Antrim & Newtownabbey Borough Council	----	----	No comment	
Armagh City, Banbridge & Craigavon Council	✓		<p>If not already considered, the completed plan should be subjected to a validation process.</p> <p>Whilst this in itself does demand resourcing, elements of the plan can be regularly tested for currency and effectiveness. This process is consistent with best practice and guidance and contributes to the principles within the Emergency Planning Cycle. Cabinet Office (2011;17)</p>	<p>The final FRMPS, like the draft Plans, will be validated by the cross departmental Floods Directive Steering Group.</p> <p>The EU Floods Directive requires that the FRMPs are reviewed on a 6 year cycle. The time line of the next Plan cycle is:-</p> <ul style="list-style-type: none"> • Further Preliminary Flood Risk Assessment – 22 December 2018 • Flood Hazard and Risk Maps update – 22 December 2019 • The Flood Risk Management Plans update – 22 December 2021 <p>The Directive requires that future Plan updates will include an assessment of progress achieved in relation to the objectives; a summary of the measures which were included in the previous Plan but not implemented and the reason for their non-implementation and a description of additional measures that were undertaken but which weren't included in the previous Plan.</p> <p>Revision of the flood maps is an ongoing process that is undertaken as necessary to take account of new information such as, hydrometric and tide level data, historical flood records and current climate change predictions. As new flood mapping becomes available the impact on existing defences and the likelihood of overtopping for predicted design events will also be reviewed and updated.</p>
Belfast City Council		✓	<p>In terms of the Belfast Plan:</p> <ul style="list-style-type: none"> • 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 	<p>It is noted and agreed that a list of the 'Areas for Further Study' would be useful and this will be included in the final FRMPs.</p> <p>The FRMPs cannot be reviewed to include any areas of the former Castlereagh and Lisburn Councils that are now included in the new Belfast Council. The purpose of the FRMPs is to manage the flood risk in the</p>

Question 10: Are there further mitigations or opportunities that should be considered for the plan?

Respondent	Yes	No	Respondent Comments	Department's Response
			<p>now part of Belfast?</p> <ul style="list-style-type: none"> • 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. • It is recommended that the information on the purpose of the Lagan Weir should be reworded to make it clear that although it can on occasion, and depending on very specific circumstances, be used to support flood mitigation measures it is not designed as a flood defence system. 	<p>specified SFRAs. It should be noted that the Belfast SFRA is limited to a specific geographical area that is highlighted in the FRMPs and does not include the whole of the BC Council area. As the two additional areas to be included in BC Council area are not named SFRAs, the management of the flood risk in these areas is not specifically addressed within the FRMP.</p> <p>The details of the Connswater Community Greenway project will be updated to reflect the progress achieved by Dec 2015.</p> <p>The FRMPs will be revised to include details of any significant flooding that occurred in 2014/15.</p> <p>The areas for community engagement on Page 342 will be reviewed in light of the work undertaken in the Connswater catchment and serious flooding occurring in 2014.</p> <p>The description in the draft FRMPs of the purpose of the Lagan Weir will be reviewed and, if necessary, revised in the final FRMPs.</p>
Carrickfergus Borough Council		✓		
Craigavon Borough Council	✓		<p>Invariably the only time that flooding and the impacts of flooding are focused on are during and in the immediate aftermath of a flooding incident. Whilst Council welcomes the creation of the Neagh Bann Flood Forum, it is considered that it meets too infrequently and lacks focus in terms of setting targets and achieving tangible goals which are demonstrable to the communities affected by flooding time and time again.</p> <p>Even in the Draft Flood Risk Management Plans, reference is made to the rollout of the measures being "dependent on funding being available."</p>	<p>The Department believes that its Floods Directive Consultation Network, which included the Local Flood Forums, has served it well and has assisted it to meet all of the requirements of the Directive within the challenging deadlines prescribed by the EC. However, the Department is minded to review the future arrangements for consultation and engagement when we pass the end date for the first plan cycle in December 2015. This review will consider the future role of the Local Flood Forums and the regularity with which they meet.</p>
Fermanagh &		✓		

Question 10: Are there further mitigations or opportunities that should be considered for the plan?

Respondent	Yes	No	Respondent Comments	Department's Response
Omagh District Council				
Freshwater Task Force/ Enagh Sustainable Development Forum/Holy Well Trust				
Institution of Civil Engineers (ICE)		✓		
PSNI		✓		
Mid and East Antrim Council		✓		
NI Fire and Rescue Service	✓		Given the size of the FRMP document it may be worth creating an additional Flood Risk Matrix Annex, which could summarise all twenty risk areas on one page and include the; potential adverse consequences details, prevention, protection and preparedness measures, all of which could then be explored sub regionally in the main document. It would also be a useful ready reckoner for the Flooding and Severe Weather Groups to progress flood plans.	The Department notes the NIFRS's suggestion to append a summary table in the FRMPs that contain the key flood risk data (in terms of adverse consequences etc) and the planned measures for each of the SFRA's. The Department believes that there may be some merit in this suggestion and will consider the inclusion of such a table in the final FRMPs.
NI Housing Executive		✓		
NI Water		✓		
Six Mile Water Trust also Antrim & District	✓		Legislate for clear limits of new development that can impact on a water course. Millions can be saved in the long term by logical planning in the first instance.	As stated previously in the Department's response to the SMWT/A&DAC comments to Question 5 and 7, the Department considers that PPS15 – Planning and Flood risk prevents inappropriate development within known flood risk areas.

Question 10: Are there further mitigations or opportunities that should be considered for the plan?

Respondent	Yes	No	Respondent Comments	Department's Response
Angling Club			Engage directly with those residents already affected by previous flooding or at risk. Our water ways, rivers, dams & reservoirs, marsh and bog must also be protected, it is important to remember:-As humans we have a choice as to where and how we build!	As stated previously in the Department's response to the comment on Question 6; The Department agrees that the involvement of local communities in managing flood risk is essential. A Community Resilience Pilot Project has been undertaken to engage with 10 communities at risk of flooding and involve them in the preparation of flood emergency plans. This work and a commitment to extend this to a further 20 communities is detailed in the FRMPs.
Ulster Farmers Union (UFU)		✓		

ANNEX B

Letter based Responses and comment

- B1. Consumer Council**
- B2. Department of Environment, Planning Policy Division**
- B3. Department of Health, Social Services & Public Safety**
- B4. Natural Living Assets**
- B5. Northern Ireland Housing Executive (addition to questionnaire)**
- B6. Public Health Agency**
- B7. UK Independence Party**
- B8. Ulster Angling Federation plus Loughmacrory & Murrins District Angling Club**
- B9. Northern Ireland Environment Agency**



The Consumer Council

Alan Reddick
Strategic Planning Unit
Rivers Agency
Hydebank
4 Hospital Road
Ballydollahgan
BELFAST
BT8 8JP

22 June 2015

Dear Sir

Draft Flood Risk Management Plans 2015-2021

Our reference: PD20010/2139

The Consumer Council is pleased to respond to the Rivers Agency's consultation on the draft Flood Risk Management Plans (dFRMP).

The Consumer Council is an independent consumer organisation, working to bring about change to benefit Northern Ireland (NI) consumers. Our aim is to make the consumer voice heard and make it count.

We have a statutory remit to *promote and safeguard the interests of* consumers in NI and we have specific functions in relation to energy, water, transport, postal services and food. These include considering consumer complaints and enquiries, carrying out research and educating and informing consumers.

In taking forward our broad statutory remit we are informed by and representative of consumers in NI. To represent consumers in the best way we can, we listen to them and put their priorities at the heart of all we do.

The Consumer Council has become increasingly involved in the area of flood risk management, flood response and building flood resilience since taking on our formal legal powers to represent consumers for water and sewerage services in 2007 under The Water and Sewerage Services (Northern Ireland) Order 2006.

Our views on flooding are based on our research into consumers' views on flooding and separate research to inform the development of the Department for Regional Development's draft Long Term Water Strategy.

Strategic approach

Flooding, regardless of its source, can be devastating. The impacts of flooding, even small scale localised events, on the social, physical and mental wellbeing of individuals and communities clearly make it a risk that we all wish to minimise.

The Consumer Council supports the aims and approaches detailed in the dFRMP to reduce and manage the risk of flooding.

Consumers support investing in flooding solutions and spreading the costs over many years as well as investing in more sustainable, less expensive ways of managing rain water above ground, including the promotion and use of SuDS.

Joined up Government action is expected by consumers. This is not always apparent and consumers can be sceptical of Government strategies. It is encouraging that the dFRMP has been drafted with a clear understanding that work is needed across Government to reduce flood risk and with defined actions to deliver localised benefit. Consumers expect Government and the organisations charged with providing services to plan, make strategic decisions and be able to explain the costs and benefits.

Over two thirds of consumers support a single Government body having responsibility for all types of flooding and that this would better meet the needs of the public. The formation of the Department of Infrastructure in 2016 will unify the three main drainage agencies. Consumers will expect this to continue the improved integration and coordination of investment planning, flood response and flood risk management.

Broader Legislative and Policy context

The Consumer Council has been involved in the development of many aspects of the broader legislative and policy context set out across pages 13 and 14 of the dFRMP, and we are supportive of the combined strategic aims set out across these different initiatives.

We would support the development of a NI Floods Bill.

Community involvement

Rivers Agency will be aware of the Consumer Council's involvement and support of the Regional Community Resilience Group (RCRG). The Consumer Council with the assistance of the Red Cross reviewed the work of the RCRG pilot and recommended that it should continue.

It is important that the communities set to benefit from the plans in the dFRMP are informed of when the projects and benefit will be delivered.

Costs

The costs of implementing all FRMP measures are considerable. Our research shows that consumers want investment to provide sustainable flooding solutions and improved assistance for those affected by flooding but recognise that affordability will always be a central factor. The Consumer Council therefore supports the prioritised approach set out in the dFRMP.

If you would like to discuss any points made in this response please contact me.

Yours sincerely



Kathy Graham
Interim Director of Policy



Department of the
Environment

www.doeni.gov.uk

Jonathan McKee
Director of Business Development
Rivers Agency
Headquarters
4 Hospital Road
Ballydollahgan
BELFAST
BT8 8JP

Planning Policy Division

4th Floor
Causeway Exchange
1-7 Bedford Street
Town Parks
Belfast
BT2 7EG

Telephone: (028) 90823323

Email:

Your reference:

Our reference:

24 June 2015

Dear Jonathan

Consultation on Draft Flood Risk Management Plans

Thank you for your correspondence dated 22 December 2015 inviting comments on the above from DOE Planning Policy Division.

I welcome and the opportunity to inform the preparation of the Flood Risk Management Plans which flow from the requirements of the EU Floods Directive and will contribute to reducing the impact of flooding on communities and the environment.

The Department's role in contributing to minimising and managing flood risk to people, property and the environment is primarily through its function in developing regional planning policy, and through its involvement in wider cross-departmental strategies and initiatives such as 'Storm Water Management Group'

Operational planning policy which already contributes to a reduction in flood risk includes Revised Planning Policy Statement (PPS) 15 'Planning and Flood Risk.' I am pleased therefore to note that this important planning policy statement is referenced throughout the consultation draft document.

However, you will be aware that since the consultation document issued for comment the planning system has fundamentally reformed. On 1 April 2015 the vast majority of planning functions transferred from the Department to 11 new councils. Under this reformed two-tier planning system councils are now responsible for the majority of planning decisions, planning enforcement and the preparation of Local Development Plans for their areas.

As well as putting in place a new legislative framework for the new planning system, the Department is bringing forward a new Strategic Planning Policy Statement. Work on the final version of the Strategic Planning Policy Statement (SPPS) has recently been concluded and this important document for the reformed two-tier planning system is expected to be published in the near future following Executive Committee

consideration. The SPPS will address, inter alia, sustainable development and how planning and flood risk are taken into account within the planning system.

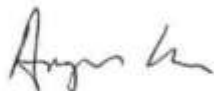
When published in final form the SPPS will support and guide local plan-making, the design and delivery of individual development proposals and the determination of planning applications and appeals. It also has a key role in influencing how these functions are carried out by the new councils.

The Flood Risk Management Plan should be updated to reflect the new planning system and the SPPS which consolidates updates and reflects in a strategic way the existing provisions of Revised PPS15.

I have made a number of specific comments on the consultation document for your consideration and my team are happy to assist with reviewing any necessary revisions.

I hope you find this response helpful and I am of course happy to meet to discuss further, if necessary.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Angus Kerr', written in a cursive style.

Angus Kerr

Director
Planning Policy Division

B3 – Department of Health, Social Services and Public Safety

From: Reddick, Alan
To: Dawson, Stephen
Cc:
Subject: FW: Draft Flood Risk Management Plans

Sent: Fri 19/06/2015 14

From: Robinson, David (DHSSPS)
Sent: 19 June 2015 10:12
To: Reddick, Alan
Subject: Draft Flood Risk Management Plans

Alan

Thanks for the opportunity to comment on the Draft Flood Risk Management Plans.

This document is very comprehensive and provides considerable useful information.

I welcome in particular –

- the objectives include reducing the adverse consequences of flooding on Human Health including reducing the risk to health and wellbeing;
- the section at Paragraph 3.2.3 on Preparedness which covers a wide range of topics in detail including exercising , emergency response, Lead Government Department, Warning and Informing and Community Engagement.
- that the SFRA's include Care homes, GP surgeries, hospitals and fire stations.


The document provides a good balance between the social, economic and environmental objectives and I have no specific comments to make on the other questions in the consultation.

David

Emergency Planning Branch

DHSSPS
Room C4 04 Castle Buildings

Stormont Belfast
Ext 20699
Tel no 02890 520699
Mobile: 07837 296997



MAKING LIFE BETTER

Flood risk management plan consultation response: 21 June 2015

Please find some brief comments re the Flood Risk Management Consultation.

Conclusions of the environmental impact assessment are unclear and require further work. For example a process for determining the impact of flood prevention schemes on wider environmental impacts, in particular salmonid habitats. Commitments to continuing environmental monitoring need to be maintained.

Whilst the methodology for determining Flood risk is scientific, there is a need to consider the impact on river hydro geo morphology within salmonid rivers. Drainage schemes designed specifically for flood events may have other unintended consequences during low and normal flows. Further research, which assesses the relationship between habitat structure and fishery output, would provide useful extra decision main power. Assessment needs to nclude sediment flows, peak to trough flows, stability and the hydro geomorphological conditions such as pool, riffle, glide to accommodate salmonids. Salmonids require stable hydro- geomorphological structures to be sustainable.

There is a need for stronger representation by inland fisheries utilising scientific input from, for example Agricultural and Food Bioscience Institute, and other Fishery interests. The impact of flood mitigation measures on national and international salmonid management plans need to be considered. Consideration needs to be given to the structure of the functioning The Flood Strategy Steering Group to accommodate incorporation these needs so that these interests are fully represented.

There is a need for continuous monitoring building on the Water Framework Directive including continuous research and monitoring into new and evolving evidence for hydro-geomorphological impact assessments.

The goals of the Flood management plans are well communicated and defined in the context of flood prevention but less holistically in the context of wider environmental impacts such as a total catchment management approach.

Need for a wider catchment approach and incorporation of a scientific approach to total catchment management. It is clear that there have been many discussions involving Steering Group Committee Stakeholder Group and Flood Forums.

Brendan Kerr, Natural Living Assets.

brendan@naturallivingassets.com

9 Abbey Drive

Bangor

BT20 4DA

Housing
Executive

REGIONAL SERVICES
Strategic Planning

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Alan Reddick
Strategic Planning Unit
Rivers Agency
Hydebank
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22 June 2015

Dear Alan

The Housing Executive welcomes the publication of the draft Flood Risk Management Plans. Flooding has potentially devastating impacts, including a threat to human life, damage to buildings, pollution and compromise of economic activity. Flood risk is extremely important from a housing perspective.

The Housing Executive supports the objectives set within the Plans in relation to economic activity, human, health and social issues, and environment issues. We support the measures identified to deliver the objectives, namely prevention of increased flooding by appropriate land use planning, protection of communities and the environment by provision of schemes and approaches to reduce flood risk, and preparedness arrangements, to improve dealing with flooding when it occurs.

The Plans will provide a more coordinated approach to managing flood risk and will be a key source of information in taking forward the business of flood risk management and driving the activities necessary to manage the risk. Whilst we acknowledge that the Plans do not deal with the detail of individual schemes or definite scheme proposals, the Housing Executive are keen to engage with all relevant agencies to alleviate the threat of flooding to our properties.

I trust this information is of assistance.

Yours sincerely,

Esther Christie
Assistant Director
Strategic Planning
Northern Ireland Housing Executive



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By email

25th March 2015

Mr Alan Reddick
Strategic Planning Unit
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Hydebank
4 Hospital Road
Ballydollahgan
BELFAST
BT8 8JP

Dear Alan

DARD Draft Flood Risk Management Plan

Thank you for the opportunity to comment on the DARD draft Flood Risk Management Plans. We believe that the document strikes a measured balance between social, economic and environmental objectives.

The PHA agrees with the objectives set out within the draft plan, in particular reducing the consequences of flooding for human health. We also note that the plan wishes to reduce the risk to health and well-being. The PHA would welcome this approach.

The PHA would highlight that evidence suggests that the main impact on human health is in the area of adverse effects on flood victims' mental health and remedial measures should also look at this issue.

We note amongst the environmental objectives the desire to reduce the risk of pollution. We would support this objective but again note that pollution can also impact on human health as well as having an obvious adverse environmental impact.

We welcome the commitment to continued planning and preparedness and that this includes continued exercising and inter-agency working prior to and during a flooding incident. PHA also notes that there is a continued commitment to building local community capacity. We welcome this commitment and suggest that local HSC Trusts are crucial partners in this and should continue to be kept informed and engaged in local initiatives.

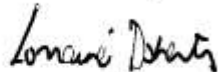
We have noted the complex detail that is included in the plan in particular surrounding the specifics for each SFRA. This level of complexity is to be commended. The PHA would not have the local knowledge or skills to comment on these local plans. We do note that in each of the tables critical HSC infrastructures are listed and this is to be welcomed.

We would assume that if new centres and locations are constructed these will be included in future versions of the plans. We commend the approach of listing the HSC and other critical locations but note that many of the most vulnerable in the community will be still located within their own homes at the time of the incident. This reinforces the earlier point where continued inter-agency working prior to and in particular during an incident will be crucially important.

The PHA has also noted reference to other related strategies contained within the plan and whilst it may not be in the purview of the Rivers Agency we would look forward to reviewing the proposed Water Bill and the Long Term Water Strategy.

We again welcome this document and the opportunity to comment on same and we look forward to continued close working relations with DARD and Rivers Agency colleagues.

Yours sincerely

A handwritten signature in black ink, appearing to read "Lorraine Doherty".

Dr Lorraine Doherty
Assistant Director Health Protection



NORTHERN IRELAND

UK Independence Party in Northern Ireland

Stormont Office

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E-mail & Phone

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02890521504

DARD REF: DA2-1420607

Respondent: UKIP

Consultation on Draft Flood Risk Management Plans

We believe that inspection and maintenance should be given the highest priority when managing flood risk.

8.2.1 Notes that “programmed flood alleviation schemes will identify infrastructure upgrade works and maintenance activities, as well as carrying out studies to identify further works to be taken forward.” UKIP believe that alleviation schemes are a worthwhile exercise however robust protocol must be put in place for the regular inspection of drainage and flood protection infrastructure. This is a must which must be met by Transport NI; flood alleviation measures will only be effective with regular inspection and maintenance. Transport NI should appoint a dedicated inspection team.

Provision needs to be made for householders who want to take positive action to avoid flooding damage by raising their houses on stilts, as has been happening in many locations in the Thames Valley. This would probably involve a cost of some £50,000 per house but should enable householders to obtain insurance. While part of the cost could be met through extensions to mortgages, the government as the planning authority which allowed houses to be built in flood plains in the first place, should provide a regime of grants to help defray costs, could negotiate large-scale cost-saving packages with builders and help householders, especially in light of widespread incidence of negative equity.

**Ulster Angling Federation
Comment on Rivers Agency Draft Flood Risk Management Plans 2015-2021
June 2015**

Index

- 1 Summary
- 2 Background
- 3 General Comments
- 4 Draft Flood Risk Management Plans 2015-2021
- 5 Flood Risk Management Plan for Northern Ireland: Environmental Report
- 6 Flood Risk Management Plan for Northern Ireland: Habitats Directive Article 6 Assessment

Abbreviations used in the text;

DFRMP	Draft Flood Risk Management Plans
NIEA	NI Environment Agency
PPS 15	Revised Planning Policy Statement 15 Planning and Flood Risk September 2014
RA	Rivers Agency
RBD	River Basin District
SAC	Special Area of Conservation
WFD	Water Framework Directive

1 Summary

There is a lack of co-ordination with the closely related documents;

The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009,
and

Revised Planning Policy Statement 15 Planning and Flood Risk
September 2014.

There is insufficient accommodation of the principles of achieving flood risk management by use of natural means, and sustainable drainage.

There is too much reliance on the traditional 'drainage engineers' approach.

There is a lack of transparency in the processes proposed.

There is a lack of commitment to environmental protection generally, especially where there is no designation or protected status.

The almost complete absence of any consideration of agriculture and related upstream effects is a significant failing which needs to be addressed.

Considerable influences which have a direct and indirect bearing on flood risk have been ignored, often by a statement along the lines of 'it's somebody else's problem', often the planners. This exercise is supposed to be an examination of flood risk, whoever is responsible. It isn't.

2 Background

The Ulster Angling Federation is the representative body for game angling associations in Northern Ireland. We have a membership of some 50 associations with a total individual membership of some 6,000 anglers. The Federation represents anglers in discussions with Public Bodies, Government and other NGO's and has been in existence since 1930. We are represented on a wide range of committees to ensure the concerns of anglers are heard.

Our member Angling Associations are very concerned about flood protection schemes on rivers and riverside development, as some of these have proved to be detrimental to the river environment generally and to fisheries in particular.

It is important that the natural integrity of rivers is protected to allow continuation of the natural ecology of the stream, and to allow existing fish populations to prosper. The following comments are made in that light.

The Resource of Angling

Local Angling Associations have worked extremely hard for many years to conserve, protect, and enhance not only the fishery on rivers but the entire river environment, for the benefit of local people and increasingly, visitors. Countless (voluntary) man-hours and hundreds of thousands of pounds have been spent to improve rivers and associated fisheries: these Associations continue to provide a self-financing and voluntary community-based effort to look after the rivers. A huge effort is now underway to protect and conserve the trout and salmon – many sea nets have been retired and strict limits on rod catches have been brought in.

The Pricewaterhouse Coopers Report of July 2007 for DCAL on the social and economic value of angling in NI, states that all forms of angling in NI support some 780 full time equivalent jobs, and are worth some £40m p.a. to the NI economy, mostly from game angling. If this jobs/economic benefit is to be maintained and enhanced, the provision of good water habitat is absolutely vital for our fisheries

The DCAL study highlighted the impressive record of angling in promoting a healthy, outdoor activity with an almost unmatched record in eliminating sectarian influences. Angling Associations are now responsible for selling large numbers of day tickets to visiting anglers and are generating considerable interest in NI among anglers from outside the area. It is therefore important that any proposal which may jeopardise this community activity should be subject to reasonable assessment.

3 General Comments

We believe that measures can and should deliver benefits for the economy, environment and society and that measures that benefit all three need to be prioritised. We are therefore disappointed to see the emphasis on delivering on the economy. Delivery of measures needs greater consideration of how multiple benefits can be optimised to deliver not just for flood protection but for Water Framework Directive, Biodiversity 2020 and other objectives, including local green space and health and well being priorities. Measures that provide benefits in this way offer overall cost efficiency savings as well as benefits to people and wildlife. Examples of such measures include sustainable drainage systems, upland restoration and sustainable land management.

We believe that there should be more measures than currently proposed that take a catchment scale, holistic approach. Although hard engineered structures will always be a significant form of flood management, there is considerable potential in natural flood management measures. These should be investigated and more widely used. Such natural flood management measures tackle the root cause of flooding rather than the majority of others which focus on treating the symptoms and ultimately result in the need for continued investment and spiralling costs. In addition, such approaches are much more amenable to delivering other benefits such as biodiversity, carbon storage or greenspace.

We feel that the plans lack measures on upland habitat restoration and measures tackling land use and management which can be a significant source of soil erosion and subsequent nutrient enrichment which can cause silting up of water courses. Upland restoration can provide a hugely valuable water storage function and healthy uplands can also slow flow and reduce flood peaks.

We are concerned that there is a lack of understanding around natural flood management measures, especially amongst the general public and we believe that FRMPs offer an opportunity to assist in raising awareness and communication of the benefits that natural flood management provides, reducing concerns about any reduction in maintenance of hard flood defences.

4 Draft Flood Risk Management Plans 2015-2021

There is a general failure to meet the requirement of The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009 Clause 16 section 5b;

*'(5) For the purposes of preparing a flood risk management plan, the Department shall—
(b) identify measures to achieve those objectives.'*

Although the means of arriving at measures are set out, the measures stated are only in a generalised form, and not specific to any river or river scheme. In effect it is simply a list of options, and not specific measures to achieve specific objectives.

In reality, there are no '*flood risk management plans*' in any of the documents, merely a note of methodology in how they may be drawn up.

Pg 11 Cl. 2.3.1 The Floods Directive

This clause refers to the features of the Floods Directive, noting that,

'Key features of the EU Directive include:-

Promoting the use of natural flood risk management measures.'

Whilst there is some very brief mention of this in the RA documents, the failure to incorporate it explicitly is a notable shortcoming which needs to be addressed.

As they are presently constituted, the documents fail to address this '*Key feature of the EU Directive*'. (and see reference to PPS 15 below)

Pg 17 Cl. 3.1 Objectives

There is an lack of co-ordination between this document and The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009

Clause 17 of the Regulations lists a number of considerations which the measures listed '*shall take account of*', but which have been omitted from the DFRMP;

*'(vii)soil and water management;
(viii)anything done under or in pursuance of the Planning (Northern Ireland) Order 1991(1) which affects development or the use of land within the river basin district to which the plan relates;*

(x)the conservation of nature whether within or outside the river basin district to which the plan relates; and

(xi)navigation and port infrastructure; and

(b) shall consider, so far as is appropriate, structural and non-structural measures and the reduction of the likelihood of flooding as means of achieving objectives.'

Furthermore, The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009 set out in Clause 17 section 2b that;

'2) A flood risk management plan—

(b) may also include the promotion of sustainable land use practices, improvement of water retention as well as the controlled flooding of certain areas in the case of a flood.'

This aspect is vitally important from the perspective of environmental protection, and the long term economics of flood protection, but is conspicuous by its absence from almost the entirety of the RA documents. This needs to form part of the RA strategy, not least because of the potential for achieving the objectives at lower cost in the long run.

Pg 17 Cl. 3.1

In the section headed '*Environmental (including cultural heritage)*', there is an unjustifiable limitation of environmental consideration to '*designated*' and '*priority*' areas/species/habitats. There is a marked emphasis on this throughout the RA documents. This means that where a scheme is proposed which has none of these, environmental protection will be very limited or non-existent. There needs to be incorporated into the fabric of the documents a requirement to ensure protection of environmental factors irrespective of the degree of protection, if any. In fact the clause as written is meaningless because the protected areas/species/habitats will enjoy protection in any case simply by virtue of their designation.

Similarly, there is a lack of co-ordination between this document and PPS 15 which states in clause 3.1;

• support the retention and restoration of natural flood plains and natural watercourses as a form of flood alleviation and an important environmental and social resource, and ensure that this is recognised in the decision making process;

• promote sustainable development through encouraging the use of sustainable drainage for new developments and redevelopment / regeneration schemes;

Whilst there is some very brief mention of these in the RA documents, the failure to incorporate them explicitly is a notable shortcoming which needs to be addressed.

In PPS 15 Appendix C there is very extensive script on the benefits of sustainable drainage, and the timetable for implementation into the planning process. However this seems to have escaped the notice of RA as there is no parallel provision within the floods documents.

Pg 35 Cl. 4.5 'Flood Risk Management Groups'

We are concerned that considerable work will be carried out in the planning and preparatory phases of flood schemes in the absence of any real direct environmental, or in particular, fishery input, e.g. in the;

Flood Strategy Steering Group
Flood Investment and Planning Group

It is not realistic to say that RA have their own in house environmental staff – this will not be sufficient. In the very recent past, we are aware of poor practice in respect of fishery measures on a number of rivers, for example the catastrophic work on a tributary of the river Roe. There is a need to have reasonable environmental input at an early stage, not tagged on as an afterthought after all the decisions have been made.

The issues here include transparency and participation: how much of the work of these bodies will involve local interests, NGOs, or even Government environment/fishery bodies?

There remains more than a shadow of the old Drainage Division 'Decide, Announce, Defend' approach which needs to be set aside.

Pg 68 Cl. 5.4.4

The examination of the flood risks in the Antrim area represent an example of how hard engineered solutions in the past have served to move the problem elsewhere instead of offering a long term solution. (the writer has some little knowledge of the area)

After all the years of bluff and bluster we are still exactly where we have always been, and that is permitting development up to the rivers edge, and then wondering how we put in walls, banks, etc to contain high water, and who is going to pay for it.

It is a failure of the RA documents that they do not address this simple issue. To say it is merely a planning issue and not for this proposal simply is running away from reality. RA need to grasp this nettle in order to avoid endless hard engineered schemes at considerable capital and maintenance cost. There is no point in producing endless reams of paper and then ignoring the elephant in the room.

Pg 182 Cl. 5.9.5

We have reproduced below a section concerning south Antrim which we find concerning on a number of levels.

'Having conducted a detailed assessment of the fluvial flood risk to Glengormley and Mallusk, Rivers Agency has determined that potential flood alleviation scheme may be justified for this area.'

A feasibility study was carried out in September 2014 which identified a number of locations in the Glengormley and Mallusk area that are at risk from fluvial flooding. The feasibility study found that the source of the flooding was a number of designated and un-designated watercourses. The study produced a number of recommendations to alleviate the flooding within the study area.

The recommendations regarding designated watercourses will be submitted to Rivers Agency's Capital Procurement Unit and the recommendations regarding un-designated watercourses will be presented to the Flood Investment and Planning Group, (FIPG). The findings of this will be taken into consideration in the final version of the FRMP (December 2015).'

As we have mentioned above, here is a proposal which has been developed to a considerable degree apparently without any real environmental input, public participation, or transparency in making available the audit trail of the decision making process. We have selected this at random; there are other examples in the report. Furthermore, it seems that this unseen work is to influence the final RBMP – to what extent?

Pg 500 Cl. 10.1 Monitoring

We note that;

'Progress on the implementation of these Plans will be reported on an annual basis to the European Commission through the normal reporting process.'

Can we have an assurance that all such reports will be readily available to the public ?

Pg 500 Annex H

The 'Measures Activities' column reflect the shortcomings of the early sections of the report. For instance under 'Flood Prevention' and 'Flood Protection' there is no mention of;

'the retention and restoration of natural flood plains and natural watercourses as a form of flood alleviation'

as set out in PPS 15

Similarly, there is no mention of;

'the promotion of sustainable land use practices, improvement of water retention as well as the controlled flooding of certain areas in the case of a flood.'

as set out in The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009 set out in Clause 17 section 2b.

5 Flood Risk Management Plan for Northern Ireland: Environmental Report

This document has no page numbers and is consequently difficult to navigate and risks having missing pages.

Clause 4.2 Table 5

This table does not list the significant sources of information on baseline fishery data, i.e. DCAL, Lough Agency, AFBI.

Clause 4.4 Table 6

We are puzzled by the reference to '*fisheries practices*' in para. 2 of the table. Please explain!?

Clause 7.3 Table 9

In respect of '*Environmental (including cultural heritage)*', the following comments apply;

There is an unjustifiable limitation of environmental consideration to '*designated*' and '*priority*' areas/species/habitats. There is a marked emphasis on this throughout the RA documents. This means that where a scheme is proposed which has none of these, environmental protection will be very limited or non-existent. There needs to be incorporated into the fabric of the documents a requirement to ensure protection of environmental factors irrespective of the degree of protection, if any. In fact the clause as written is meaningless because the protected areas/species/habitats will enjoy protection in any case simply by virtue of their designation.

Clause 7.4 Table 10

At '*Surface Water Management*' there seems to be a concerted effort to condemn SUDS. This is unwarranted and unjustified, flies in the face of PPS 15 and needs to be withdrawn.

At '*Development outside Flood Risk Areas*' there is an abrogation of interest and responsibility which is lamentable and which needs to be rewritten.

At '*New Flood Alleviation scheme - Culvert works*' the assessment summary is wholly inadequate as there is no mention of the often severe effects culverts have on environment and fisheries in particular.

Appendix 3:
Summary of Plan Effects (by Measure Type) and Mitigation Measures

Table 2: Summary of Effects of Culvert Works

The '*Potential impact description*' is completely unrealistic in that it glibly assumes all culverts will be designed and built well, observing;

'Adherence to PPGs and best practice regarding building materials and working practices around water courses'

In fact in the real world it is a continuous struggle to avoid poor practice in the design and building of culverts. The end result is often simply a bad job.

The '*Residual effect significance (with mitigation)*' is listed as '*Adverse*', which is realistic, but probably somewhat optimistic. In the early 21st century it is a disgrace that this situation is so glibly accepted as the norm. There is no need for this, much better can be done, but it needs a commitment on the part of RA which is simply not there at present.

6 Flood Risk Management Plan for Northern Ireland: Habitats Directive Article 6 Assessment

This document has no page numbers and is consequently difficult to navigate and risks having missing pages.

Appendix 1: North West River Basin District HRA

(This comment applies to all RBDs)

Under '*Maintenance of channels*' there is a blanket assumption that there is a system for N2K assessments where maintenance works are programmed, and that this functions satisfactorily. This is not true. There are considerable ongoing problems in this process; the recent catastrophic work by RA on a tributary of the river Roe is but one example.

While at least some of the responsibility for the problems lies with the inability of NIEA to administer the N2K protection, nevertheless there is a considerable problem within RA: the protection of environmental attributes is simply not good enough. The glib assumptions in the text across all RBDs are unwarranted and need to be qualified. Great improvement by RA is needed.

Appendix 4: North West River Basin District Natura 2000 Sites

(These comments apply to all RBDs)

These RBD N2K Appendices are a curious confection; the sites are not in number, geographical, or alphabetical order. They appear to be a fairly random conglomeration of information.

Perhaps this may explain the surprising omission of the river Faughan SAC;

UK 0030361 River Faughan and Tributaries.

The '*Qualifying features*' column is questionable in that it fails to differentiate between species/habitats that are a primary reason for selection of the site, and species/habitats that are present as a qualifying feature, but not a primary reason for selection of the site. This should be corrected, along with showing whether Annex I or Annex II is applicable.

There are a large number of blank pages included which relate to the Republic of Ireland, without explanation as to why this should be – is there any point in their inclusion ?

Mr Alan Reddick
Strategic Planning Unit
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Hydebank
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Ballydollahan
BELFAST
BT8 8JP

Date: 12 June 2015

Dear Alan

CONSULTATION OF DRAFT FLOOD RISK MANAGEMENT PLANS DECEMBER 2014

Thank you for your invitation to comment on the Draft Flood Risk Management Plans (FRMPs) for Northern Ireland.

Northern Ireland Environment Agency Water Management Unit (NIEA WMU) welcomes these plans, and notes in particular the importance of coordination with the River Basin Management Plans (RBMPs) as required under the Water Framework Directive (WFD). To this end, NIEA WMU notes the alignment of the spatial coverage of the plans with Neagh Bann, North Western and North Eastern River Basin Districts.

The FRMPs identify the need to achieve the objectives of WFD in terms of good status as identified in the Environmental Objectives as set out in section 3.1. The measures in section 3.2 further emphasise this through identification of Protection Measures for Catchment Based Management and Surface Water Management in section 3.2.2. NIEA WMU see the coordination of river basin and flood risk management planning as an important element in delivering both Directives, and the plans are key to ensuring that this link is clearly demonstrated to the European Commission (EC).

As these measures are taken forward, there is an opportunity to further the understanding and implementation of Natural Water Retention Measures (NWRMs) and Sustainable Drainage Systems (SuDs) through multi-agency projects at a catchment scale, such as the Strategic Drainage Infrastructure Programme for the Belfast area. NWRMs have been highlighted in particular by the EC in its Communication on the Water Framework Directive and Floods Directive: Actions towards the 'good status' of EU water and to reduce flood risks (COM (2015) 120).

In addition, strategic land use and planning policies across Northern Ireland could further consider the multiple benefits that may be gained through holistic and integrated catchment management. This may encompass influencing agricultural, forestry and upland land management schemes through countryside management strategies and rural development programmes in future.

NIEA WMU welcomes the continued engagement with Rivers Agency through the interdepartmental Floods Directive Steering Group and the local Flood Forums. It also appreciates Rivers Agency engagement on the corresponding groups for WFD at interdepartmental, interagency and catchment stakeholder group level. In particular the work of the Inter-agency group on River Restoration and Continuity has provided a sound basis for developing catchment projects in future. In terms of implementation of the plans at a local level, lead contacts within NIEA WMU will be the three River Basin District Managers:

North Eastern River Basin District: Mrs Stephanie Millar

Neagh Bann River Basin District: Dr Bridgeen Magorrian

North Western River Basin District: Mr Kerry Anderson.

Measures within draft River Basin Management Plans highlight the need for multi-agency working at a catchment level to deliver benefits for water status, morphology, flooding and fisheries through a coordinated, joined up approach. NIEA WMU looks forward to developing these partnership projects through the next plan period.

I trust these comments are helpful, and welcome continuing engagement on the FRMPs and RBMPs as these are finalised and implemented.

Yours sincerely



GABRIEL NELSON
Assistant Director NIEA Water Management Unit

cc Wendy McKinley
Bridgeen Magorrian
Stephanie Millar
Kerry Anderson

B1 The Consumer Council

Respondent's Comments	Department's Response
<p>The Consumer Council has become increasingly involved in the area of flood risk management, flood response and building flood resilience since taking on our formal legal powers to represent consumers for water and sewerage services in 2007 under The Water and Sewerage Services (Northern Ireland) Order 2006.</p>	<p>The Department recognises the important role of the Consumer Council in representing the views and concerns of consumers affected by flooding and are grateful for its active participation in the Local Flood Forums and the practical support for the introduction of the Homeowner Flood Protection Grant Scheme.</p>
<p>The Consumer Council supports the aims and approaches detailed in the dFRMP to reduce and manage the risk of flooding.</p>	<p>The Department welcomes the Consumer Councils general support for the aims and approaches detailed in the Draft FRMPs.</p>
<p>Consumers support investing in flooding solutions and spreading the costs over many years as well as investing in more sustainable, less expensive ways of managing rain water above ground, including the promotion and use of SuDS.</p>	<p>All flood alleviation projects will continue to be subject to an economic appraisal that takes into consider all of the costs and benefits over the long term (typically 100 years).</p> <p>NIEA's Strategy for the Promotion of the use of SuDS within Northern Ireland was published in 2011. The aim of this strategy is to establish SuDS as the preferred approach for managing the storm water discharges which arise from the development of land. Although many of the recommendations within this strategy have been adopted, some work remains to be done to establish the full realisation of SuDS as a viable and routinely adopted solution to storm water management. The Department will revise the FRMPs to clearly describe the current position with SuDS and outline the works that remain to be addressed to secure their wider use.</p>
<p>Joined up Government action is expected by consumers. This is not always apparent and consumers can be sceptical of Government strategies. It is encouraging that the dFRMP has been drafted with a clear understanding that work is needed across Government to reduce flood risk and with defined actions to deliver localised benefit. Consumers expect Government and the organisations charged with providing services to plan, make strategic decisions and be able to explain the costs and benefits.</p>	<p>The Department accepts that there is often a lack of public 'buy in' to Government strategies and welcomes Consumer Council's recognition that the draft FRMP demonstrates a clear understanding of the cooperative approach that is required across Government to manage the risk of flooding.</p>
<p>Over two thirds of consumers support a single Government body having responsibility for all types of flooding and that this would better meet the needs of the public. The formation of the Department of Infrastructure in 2016 will unify the three main drainage agencies. Consumers will expect this to continue the improved integration and coordination of investment planning, flood response and flood risk management.</p>	<p>It is accepted that there is still room for improvement in regard to multi-agency coordination and cooperation to secure a more proactive strategic approach to investment in work programmes. The Department is confident that moving the key drainage infrastructure providers (NI Water, Transport NI and Rivers Agency) and the Strategic Investment Unit into the new Department for Infrastructure will present opportunities to secure efficiencies, improve coordination and integrate work programmes.</p>

B1 The Consumer Council

Respondent's Comments	Department's Response
<p>The Consumer Council has been involved in the development of many aspects of the broader legislative and policy context set out across pages 13 and 14 of the dFRMP, and we are supportive of the combined strategic aims set out across these different initiatives.</p>	<p>The Department notes and welcomes Consumer Council's support for the strategic aims of the initiatives within the FRMPs.</p>
<p>Rivers Agency will be aware of the Consumer Council's involvement and support of the Regional Community Resilience Group (RCRG). The Consumer Council with the assistance of the Red Cross reviewed the work of the RCRG pilot and recommended that it should continue.</p> <p>It is important that the communities set to benefit from the plans in the dFRMP are informed of when the projects and benefit will be delivered.</p>	<p>Community resilience to flood risk is an important element of the draft FRMPs. Following the success of the RCRG Pilot Project to engage with communities at risk of flooding and involve them in the preparation of flood emergency plans, there is commitment in the FRMPs to extend this to a further 20 communities.</p> <p>The Department's engagement with respective communities in regard to community resilience is dependent, not only on its own resources, but also on those of fellow RCRG member organisations. Communities will be informed of proposed engagement once resources and timescales are known but this detail may not be available for the final FRMPs. The Department is also considering publishing on Rivers Agency's website, its capital works programme for flood alleviation schemes and information to show the status of the feasibility and design studies that are being undertaken in connection with known flooding problems.</p>
<p>The costs of implementing all FRMP measures are considerable. Our research shows that consumers want investment to provide sustainable flooding solutions and improved assistance for those affected by flooding but recognise that affordability will always be a central factor. The Consumer Council therefore supports the prioritised approach set out in the dFRMP.</p>	<p>The Department welcomes the Consumers Council's recognition that affordability is an issue and that it supports the prioritised approach set out in the draft FRMPs.</p>

B2 Department of Environment, Planning Policy Division

Respondent's Comments	Department's Response
<p>You will be aware that since the consultation document issued for comment the planning system has fundamentally reformed. On 1 April 2015 the vast majority of planning functions transferred from the Department to 11 new councils. Under this reformed two-tier planning system councils are now responsible for the majority of planning decisions, planning enforcement and the preparation of Local Development Plans for their areas.</p> <p>As well as putting in place a new legislative framework for the new planning system, the Department is bringing forward a new Strategic Planning Policy Statement. Work on the final version of the Strategic Planning Policy Statement (SPPS) has recently been concluded and this important document for the reformed two-tier planning system is expected to be published in the near future following Executive Committee consideration. The SPPS will address, inter alia, sustainable development and how planning and flood risk are taken into account within the planning system.</p> <p>When published in final form the SPPS will support and guide local plan-making, the design and delivery of individual development proposals and the determination of planning applications and appeals. It also has a key role in influencing how these functions are carried out by the new councils.</p> <p>The Flood Risk Management Plan should be updated to reflect the new planning system and the SPPS which consolidates updates and reflects in a strategic way the existing provisions of Revised PPS15.</p>	<p>The Department will revise the FRMPs to describe how flood risk will be taken in account within the new two-tier planning system that came into effect on 1 April 2015.</p>

B3 Department of Health, Social Services & Public Safety

Respondent's Comments	Department's Response
<p>This document is very comprehensive and provides considerable useful information.</p> <p>I welcome in particular –</p> <ul style="list-style-type: none">• the objectives include reducing the adverse consequences of flooding on Human Health including reducing the risk to health and wellbeing.• the section at Paragraph 3.2.3 on Preparedness which covers a wide range of topics in detail including exercising , emergency response, Lead Government Department, Warning and Informing and Community Engagement.• that the SFRA's include Care homes, GP surgeries, hospitals and fire stations. <p>The document provides a good balance between the social, economic and environmental objectives and I have no specific comments to make on the other questions in the consultation.</p>	<p>The Department notes and welcomes the DHSSPS's positive comments and support.</p>

B4 Natural Living Assets

Respondent's Comments	Department's Response
<p>Conclusions of the environmental impact assessment are unclear and require further work. For example a process for determining the impact of flood prevention schemes on wider environmental impacts, in particular salmonid habitats. Commitments to continuing environmental monitoring need to be maintained.</p>	<p>The Flood Risk Management Plans are strategic documents and as a consequence the associated Strategic Environmental Assessment makes no attempt to address the potential environmental impacts of site specific measures that may be undertaken within the SFRA in the future. All planned flood alleviation works will be subject to the Drainage (Environmental Impact Assessment) Regulations (Northern Ireland) 2006. This legislation requires the Agency to consider the effects on the environment of all proposed works. The Department fully complies with the requirements of these regulations which ensure that all proposed schemes are widely publicised, that all stakeholders, including the general public, are given an opportunity to forward their opinion on the scheme and its likely effects (including on fisheries). Where there is a determination that the scheme it is likely to have significant environmental effects, an environmental statement is prepared by the Department for public consultation. On the basis of the representations received through the consultation on the environmental statement, the Department will determine if a scheme shall proceed in whole or in part, with whatever measures are necessary to <i>'avoid, reduce and if possible, remedy significant adverse effects'</i>.</p>
<p>Whilst the methodology for determining Flood risk is scientific, there is a need to consider the impact on river hydro geo morphology within salmonid rivers. Drainage schemes designed specifically for flood events may have other unintended consequences during low and normal flows. Further research, which assesses the relationship between habitat structure and fishery output, would provide useful extra decision main power. Assessment needs to include sediment flows, peak to trough flows, stability and the hydro geomorphological conditions such as pool, riffle, glide to accommodate salmonids. Salmonids require stable hydro-geomorphological structures to be sustainable.</p>	<p>With respect to hydro-geomorphology the Department employs the River Hydromorphology Assessment Technique (RHAT) analysis for pre and post monitoring for its flood alleviation and restoration schemes.</p>
<p>There is a need for stronger representation by inland fisheries utilising scientific input from, for example Agricultural and Food Bioscience Institute, and other Fishery interests. The impact of flood mitigation measures on national and international salmonid management plans need to be considered. Consideration needs to be given to the structure of the functioning The Flood Strategy Steering Group to accommodate incorporation these needs so that these interests are fully represented</p>	<p>The Department believes that the interests of inland fisheries are robustly represented within government through DCAL Inland Fisheries and Loughs Agency.</p>

B4 Natural Living Assets

Respondent's Comments	Department's Response
There is a need for continuous monitoring building on the Water Framework Directive including continuous research and monitoring into new and evolving evidence for hydro-geomorphological impact assessments	The Department accepts the need for appropriate continuous monitoring of evidence from impact assessments on the water environment.
The goals of the Flood management plans are well communicated and defined in the context of flood prevention but less holistically in the context of wider environmental impacts such as a total catchment management approach.	The Department refers Natural Living Assets to the response to the first of the comments raised.
Need for a wider catchment approach and incorporation of a scientific approach to total catchment management. It is clear that there have been many discussions involving Steering Group Committee, Stakeholder Group and Flood Forums.	The Department is currently taking the lead in a trial catchment management plan for the Moyola River catchment through the inter-agency Catchment Oversight Group. This pilot study is assessing the use of GIS to map information from a range of stakeholders, with the aim of identifying sites and projects where works may have benefits under a number of headings.

B5 Northern Ireland Housing Executive (in addition to questionnaire response)

Respondent's Comments	Department's Response
<p>The Housing Executive supports the objectives set within the Plans in relation to economic activity, human, health and social issues, and environment issues. We support the measures identified to deliver the objectives, namely prevention of increased flooding by appropriate land use planning, protection of communities and the environment by provision of schemes and approaches to reduce flood risk, and preparedness arrangements, to improve dealing with flooding when it occurs.</p> <p>The Plans will provide a more coordinated approach to managing flood risk and will be a key source of information in taking forward the business of flood risk management and driving the activities necessary to manage the risk. Whilst we acknowledge that the Plans do not deal with the detail of individual schemes or definite scheme proposals, the Housing Executive are keen to engage with all relevant agencies to alleviate the threat of flooding to our properties.</p>	<p>The Department notes and welcomes the NIHE's positive comments and support.</p>

B6 Public Health Agency

Respondent's Comments	Department's Response
We believe that the document strikes a measured balance between social, economic and environmental objectives.	It is noted that Public Health Agency agrees with the objectives and the balance of the objectives in the FRMPs.
The PHA agrees with the objectives set out within the draft plan, in particular reducing the consequences of flooding for human health. We also note that the plan wishes to reduce the risk to health and well-being. The PHA would welcome this approach.	Noted
The PHA would highlight that evidence suggests that the main impact on human health is in the area of adverse effects on flood victims' mental health and remedial measures should also look at this issue. We note amongst the environmental objectives the desire to reduce the risk of pollution. We would support this objective but again note that pollution can also impact on human health as well as having an obvious adverse environmental impact.	The Department accepts that the distress suffered by people affected by flooding can have a profound effect on their health and well-being and that some can go on to develop serious mental health problems. It is aware of this issue through its involvement with the Regional Community Resilience Group's Pilot Project and also from current research work into emotional and psychological wellbeing that is being undertaken by organisations such as the Red Cross. The outcome of this research is expected during this particular Plan period and could inform the development of future approaches and specific measures to improve community resilience in this area. Any decision to develop specific strategies to address this issue is a matter for the health professionals, including the Public Health Agency (PHA) and the Department of Health, Social Services and Public Safety (DHSSPS). If there is a decision to develop specific measures to mitigate the potential adverse mental health effects from flooding it will be matter for the PHA to decide if these are to be particularised in any future update to the FRMPs.
We welcome the commitment to continued planning and preparedness and that this includes continued exercising and inter-agency working prior to and during a flooding incident.	Noted
PHA also notes that there is a continued commitment to building local community capacity. We welcome this commitment and suggest that local HSC Trusts are crucial partners in this and should continue to be kept informed and engaged in local initiatives.	The Department is committed to increase the involvement of local communities in managing flood risk and will welcome the continued support of the HSC Trusts in this area.
We have noted the complex detail that is included in the plan in particular surrounding the specifics for each SFRA. This level of complexity is to be	Noted

B6 Public Health Agency

Respondent's Comments	Department's Response
commended. The PHA would not have the local knowledge or skills to comment on these local plans. are listed and this is to be welcomed.	
We do note that in each of the tables critical HSC infrastructures. We would assume that if new centres and locations are constructed these will be included in future versions of the plans. We commend the approach of listing the HSC and other critical locations but note that many of the most vulnerable in the community will be still located within their own homes at the time of the incident. This reinforces the earlier point where continued inter-agency working prior to and in particular during an incident will be crucially important.	As new data on the location of HSC infrastructure becomes available this will be uploaded to Government's detailed flood risk maps and recorded in updated FRMPs as and when appropriate. It is accepted that many vulnerable persons are living within their own homes and that the emergency plans developed through the local community resilience groups should seek to manage the risks to vulnerable persons.
The PHA has also noted reference to other related strategies contained within the plan and whilst it may not be in the purview of the Rivers Agency we would look forward to reviewing the proposed Water Bill and the Long Term Water Strategy.	It should be noted that public consultation on the Long Term Water Strategy has concluded.

B7 UK Independence Party (UKIP)

Respondent's Comments	Department's Response
<p>We believe that inspection and maintenance should be given the highest priority when managing flood risk.</p>	<p>The Department agrees with your comments that the inspection and maintenance of adopted sewerage systems and designated watercourses and flood defences should be a key priority when managing flood risk.</p>
<p>UKIP believes that alleviation schemes are a worthwhile exercise however robust protocol must be put in place for the regular inspection of drainage and flood protection infrastructure. This is a must which must be met by Transport NI; flood alleviation measures will be effective with regular inspection and maintenance. Transport NI should appoint a dedicated inspection team.</p>	<p>Transport NI, NI Water and Rivers Agency each have their own asset management plans to ensure that their respective drainage and flood defence infrastructure is maintained as necessary to appropriate standards of service.</p>
<p>Provision needs to be made for house holders who want to take positive action to avoid floods by raising their homes on stilts, as has been happening in many locations in the Thames Valley. This would probably involve a cost of some £50,000 but should enable householders to obtain insurance. While part of the cost could be met through extensions to mortgages, the government as the planning authority which allowed houses to be built in flood plains in the first place, should provide a regime of grants to help defray the costs, could negotiate large-scale cost-saving packages with builders and help householders, especially in light of widespread incidence of negative equity.</p>	<p>The Department is planning to introduce a Homeowner Flood Protection Grant Scheme in autumn 2015. The Grant Scheme will provide the owners of residential properties that are at significant risk of flooding with technical and financial support necessary to install products in their homes which make them more resistant to the entry of floodwater.</p> <p>The Department notes UKIP's suggestion to raise flood prone properties on stilts and accepts that in some very specific situations this may be a viable solution. However, in Northern Ireland the vast majority of flood prone properties are located within high density residential areas and as a consequence, the raising of properties on stilts would not be a practical option.</p>

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<p>There is a general failure to meet the requirement of The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009 Clause 16 section 5b;</p> <p style="padding-left: 40px;"><i>'(5) For the purposes of preparing a flood risk management plan, the Department shall—</i> <i>(b) identify measures to achieve those objectives.'</i></p> <p>Although the means of arriving at measures are set out, the measures stated are only in a generalised form, and not specific to any river or river scheme. In effect it is simply a list of options, and not specific measures to achieve specific objectives.</p> <p>In reality, there are no <i>'flood risk management plans'</i> in any of the documents, merely a note of methodology in how they may be drawn up.</p>	<p>The Department does not accept the UAF's contention that <i>'in reality there are no flood risk management plans in any of the documents.'</i> It is certainly the case that many flood risk management measures are by their very nature generic and apply to all SFRAs. However, this is as it should be, as good flood risk management practices should apply equally to all areas.</p> <p>In relation to structural measures (i.e. engineered solutions), the Department has given a clear indication of the locations where such works are, or may be justifiable. However, there a number of stages to follow when procuring a flood alleviation scheme. Most importantly, no scheme can progress until we have carried out a detailed feasibility study, which includes a cost benefit analysis of all options, to ensure that there is a robust business case for undertaking publicly funded engineering works. Depending on the availability of resources it may take anything between 2 to 5 years for schemes to develop from the feasibility stage through to the construction stage and all schemes are prioritised and progressed alongside other competing schemes. This process is explained in detail in the 'Protection' sections of the plan measures for each of the SFRA within the draft FRMPs and is the clear reason that the Department cannot at this time, give firm commitments to undertake structural measures at specific locations within a certain timeframe.</p>
<p><u>Pg 11 - Cl. 2.3.1 The Floods Directive</u></p> <p>This clause refers to the features of the Floods Directive, noting that,</p> <p style="padding-left: 40px;"><i>'Key features of the EU Directive include:-</i></p> <p style="padding-left: 40px;"><input checked="" type="checkbox"/> <i>Promoting the use of natural flood risk management measures.'</i></p> <p>Whilst there is some very brief mention of this in the RA documents, the failure to incorporate it explicitly is a notable shortcoming which needs to be addressed.</p> <p>As they are presently constituted, the documents fail to address <i>this 'Key feature of the EU Directive'</i>. (and see reference to PPS 15 below)</p>	<p>Having reviewed the statement on Page 11 – para 2.3.1 that has been highlighted by the UAF, the Department has concluded that this statement is misleading and does not reflect the actual requirements of the Directive. The Floods Directive does not state that 'Promoting the use of natural measures' should be a 'key feature' of the Flood Risk Management Plans (FRMPs). The actual wording in Article 7.3. of the Floods Directive (which is reflected in our Regulations) is that <i>'Flood Risk Management Plans shall address all aspects of flood risk management focusing on prevention, protection and preparedness and <u>may include</u> the promotion of sustainable land practices, improvement of water retention as well as the controlled flooding of certain areas in the case of a flood event.'</i> As there is no specific reference to, or requirement to promote natural flood management, the Department will ensure that the misleading statement on page 11 is revised to reflect the actual requirements of the Directive.</p> <p>The Department accepts that Natural Flood Management (NFM) measures clearly provide important wider benefits including water quality improvement, carbon sequestration, habitat restoration, biodiversity and recreation among others. However, despite the many research studies that have been conducted to date, there is little evidence to indicate that these measures</p>

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	are capable of delivering substantial reductions in the peak flows of extreme flood events, particularly for medium to large catchments. The Department will be supportive of the deployment of NFM measures where there is sufficient scientific evidence to support the flood mitigation benefits and when it is cost beneficial to do so. As NFM has been an issue raised by a many of the respondents to the consultation, the Department undertakes to revise the FRMPs to provide details of its position in regard to this potential flood mitigation measure.
<p><u>Pg 17 - Cl. 3.1 Objectives</u></p> <p>There is an lack of co-ordination between this document and The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009</p> <p>Clause 17 of the Regulations lists a number of considerations which the measures listed <i>'shall take account of'</i>, but which have been omitted from the DFRMP;</p> <p><i>'(vii)soil and water management;</i> <i>(viii)anything done under or in pursuance of the Planning (Northern Ireland) Order 1991(1) which affects development or the use of land within the river basin district to which the plan relates;</i></p> <p><i>(x)the conservation of nature whether within or outside the river basin district to which the plan relates; and</i> <i>(xi)navigation and port infrastructure; and</i></p> <p><i>(b)shall consider, so far as is appropriate, structural and non-structural measures and the reduction of the likelihood of flooding as means of achieving objectives.'</i></p>	<p>The Department is satisfied that the draft FRMPs satisfy all of the requirements of the Floods Directive Regulations. The Regulations require that the Department shall <i>in 'setting objectives and identifying measures'</i> for the FRMPs, <i>'take account of, so far as relevant'</i> the matters to which the respondent refers.</p> <p>For example, in relation to navigation and port infrastructure, all of the stakeholders that own and operate our navigation and port infrastructure have been consulted in relation to the potential risk to their assets and business and have their own plans in place to mitigate these risks. In addition the FRMPs indicate that we have commenced the Belfast Tidal Flood Study to assess all viable options for the management of the tidal flood risk to Belfast and the all of the main stakeholders within the Port of Belfast are working closely with us on this project.</p> <p>The FRMPs take account of spatial planning insofar as they reinforce Government's commitment to sustainable development and the conservation of biodiversity through the application of Planning Policy Statement, PPS15 – Planning and Flood Risk. PPS15 ensures that flood risk is taken into taken into account in preparing development plans and is also material to decisions on individual planning applications and appeals. The aim of PPS15 is to prevent development that may be at risk from flooding or that may increase the risk of flooding elsewhere. Since the introduction of PPS15 in 2006, development in known flood risk areas has been prevented apart from a few notable exceptions. Therefore, PPS15 is a key element of the FRMP and its importance is highlighted throughout the document.</p> <p>The Department is content that the FRMPs contain the details of an appropriate range of structural and non-structural measures to mitigate the flood risk within each SFRA.</p>

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<p>Furthermore, The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009 set out in Clause 17 section 2b that;</p> <p style="padding-left: 40px;"><i>'2) A flood risk management plan—</i></p> <p style="padding-left: 40px;"><i>(b) may also include the promotion of sustainable land use practices, improvement of water retention as well as the controlled flooding of certain areas in the case of a flood.'</i></p> <p>This aspect is vitally important from the perspective of environmental protection, and the long term economics of flood protection, but is conspicuous by its absence from almost the entirety of the RA documents. This needs to form part of the RA strategy, not least because of the potential for achieving the objectives at lower cost in the long run.</p>	<p>Refer to the Department's response to the above comment in relation to Page 11 – para 2.3.1 above.</p>
<p><u>Pg 17 - Cl. 3.1</u></p> <p>In the section headed <i>'Environmental (including cultural heritage)'</i>, there is an unjustifiable limitation of environmental consideration to <i>'designated'</i> and <i>'priority'</i> areas/species/habitats. There is a marked emphasis on this throughout the RA documents. This means that where a scheme is proposed which has none of these, environmental protection will be very limited or non-existent. There needs to be incorporated into the fabric of the documents a requirement to ensure protection of environmental factors irrespective of the degree of protection, if any. In fact the clause as written is meaningless because the protected areas/species/habitats will enjoy protection in any case simply by virtue of their designation.</p>	<p>The Department does not accept the UAF's view that where a scheme is proposed at locations which do not impact on areas/species or habitats that have a 'designated' or 'priority' status, the protections for the environment will be very limited or non-existent. All planned works are subject to the Drainage (Environmental Impact Assessment) Regulations (Northern Ireland) 2006. This legislation requires the Agency to consider the effects on the environment of any of its proposed works. The Department fully complies with the requirements of these regulations which ensure that all proposed schemes are widely publicised, that all stakeholders, including the UAF and the general public, are given an opportunity to forward their opinion on the scheme and its likely effects. Where there is a determination that the scheme it is likely to have significant environmental effects, an environmental statement is prepared for public consultation. On the basis of the representations received through the consultation on the environmental statement, the Department will determine if a scheme shall proceed in whole or in part, with whatever measures are necessary to <i>'avoid, reduce and if possible, remedy significant adverse effects'</i>.</p>

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<p>Similarly, there is a lack of co-ordination between this document and PPS 15 which states in clause 3.1;</p> <p><i>‘ support the retention and restoration of natural flood plains and natural watercourses as a form of flood alleviation and an important environmental and social resource, and ensure that this is recognised in the decision making process;</i></p> <p><i>• promote sustainable development through encouraging the use of sustainable drainage for new developments and redevelopment / regeneration schemes;’</i></p> <p>Whilst there is some very brief mention of these in the RA documents, the failure to incorporate them explicitly is a notable shortcoming which needs to be addressed.</p> <p>In PPS 15 Appendix C there is very extensive script on the benefits of sustainable drainage, and the timetable for implementation into the planning process. However this seems to have escaped the notice of RA as there is no parallel provision within the floods documents.</p>	<p>The Department considers that there is satisfactory coordination between the FRMPs and PPS15. As stated previously, PPS15 is heavily referenced throughout the document and is of itself an important flood mitigation measure.</p> <p>NIEA's Strategy for the Promotion of the use of SuDS within Northern Ireland was published in 2011. The aim of this strategy is to establish SuDS as the preferred approach for managing the storm water discharges which arise from the development of land. Although many of the recommendations within this strategy have been adopted, some work remains to be done to establish the full realisation of SuDS as a viable and routinely adopted solution to storm water management. The Department will revise the FRMPs to clearly describe the current position with SuDS and outline the ongoing work to promote and support their wider use.</p>
<p><u>Pg 35 - Cl. 4.5</u> <i>‘Flood Risk Management Groups’</i></p> <p>We are concerned that considerable work will be carried out in the planning and preparatory phases of flood schemes in the absence of any real direct environmental, or in particular, fishery input, e.g. in the;</p> <p>Flood Strategy Steering Group Flood Investment and Planning Group</p> <p>It is not realistic to say that RA have their own in house environmental staff – this will not be sufficient. In the very recent past, we are aware of poor practice in respect of fishery measures on a number of rivers, for example the catastrophic work on a tributary of the river Roe. There is a need to have reasonable</p>	<p>Neither the Flood Strategy Steering Group (FSSG) nor the Flood Investment and Planning Group (FIPG) play a significant role in the planning and preparation of actual flood alleviation projects. The FSSG is a multi-agency group which is largely focused around the establishment of effective governance and coordinated emergency response protocols among the various flood response organisation. The role of the interdepartmental FIPG is to ensure that there is a coordinated approach to the investigation and resolution of existing flooding problems when it is unclear which of the flood authorities is responsible or when more than one authority has a responsibility and it isn't obvious which of the authorities should take the lead. In this circumstance, FIPG plays an oversight role and determines which of the various authorities should take the lead in the investigation of a flooding problem and ensures that there is coordination between the authorities in the development and funding of solutions. Given the specific remit of these groups, it is the Department's view that neither would require environmental or fishery input to carry out their functions effectively.</p>

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<p>environmental input at an early stage, not tagged on as an afterthought after all the decisions have been made.</p> <p>The issues here include transparency and participation: how much of the work of these bodies will involve local interests, NGOs, or even Government environment/fishery bodies?</p> <p>There remains more than a shadow of the old Drainage Division 'Decide, Announce, Defend' approach which needs to be set aside.</p>	<p>The Department accepts that there may have been few occasions in the past in which fishery related issues have arisen during the course of drainage and flood protection works undertaken by the Department. However, these are isolated instances and the Department refutes any suggestion that it adopts a '<i>Decide, Announce, Defend</i>' approach to its planned works.</p> <p>Transparency and public participation for planned flood alleviation projects are secured through Drainage (Environmental Impact Assessment) Regulations (see above for details). In addition, the Agency publishes its Annual Watercourse Maintenance Programme at the beginning of every year. This programme outlines the nature of the routine drainage maintenance works on designated watercourses, that the Agency plans to undertake and the general public are invited to submit representations on the programme. The Agency also consults with conservation and fisheries organisations to ensure that adequate protection for the environment is in place and opportunities to undertake additional works to enhance the environment, including fisheries are considered. Particular attention is given to watercourses that are adjacent to areas protected by conservation legislation (i.e. Areas of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas and Ramsar sites). Maintenance agreements are developed between the Agency and the Northern Ireland Environment Agency (NIEA) for works at such a location and Article 6 assessments are undertaken where necessary.</p> <p>Rivers Agency also has a duty to consider biodiversity, in the execution of its works. All planned works are assessed by the Agency's Environment Section, in order to identify possible impacts on, and opportunities for the enhancement of, biodiversity.</p>
<p><u>Pg 68 - Cl. 5.4.4</u></p> <p>The examination of the flood risks in the Antrim area represent an example of how hard engineered solutions in the past have served to move the problem elsewhere instead of offering a long term solution. (the writer has some little knowledge of the area)</p> <p>After all the years of bluff and bluster we are still exactly where we have always been, and that is permitting development up to the rivers edge, and then wondering how we put in walls, banks, etc to contain high water, and who is going to pay for it.</p>	<p>The Department accepts that the provision of 'hard engineered solutions' at one location can increase the risk of flooding elsewhere. In all Rivers Agency's flood studies, downstream worsening is assessed as a matter of routine using catchment wide flood models and where this is an issue, it is addressed in the appraisal of flood mitigation options. The fact is that areas of Antrim (like many of our towns and cities) have been built on a flood plain and, since we cannot undo the mistakes of the distant past, nothing but a hard engineered solution would substantively alleviate the risk of flooding to these flood prone communities. In many cases, construction of flood defences, where economically viable, may be the only practicable and sustainable solution to</p>

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<p>It is a failure of the RA documents that they do not address this simple issue. To say it is merely a planning issue and not for this proposal simply is running away from reality. RA need to grasp this nettle in order to avoid endless hard engineered schemes at considerable capital and maintenance cost. There is no point in producing endless reams of paper and then ignoring the elephant in the room.</p>	<p>protect communities at flood risk. The Department does not accept that its policies allow inappropriate development to take place 'up to the rivers edge'. As stated previously, except for a few notable exceptions, the introduction PPS15 - Planning and Flood Risk in 2006, has largely prevented development in known flood risk areas. Therefore, PPS15 is a key element of the FRMPs and its importance is highlighted throughout the documents.</p>
<p><u>Pg 182 - Cl. 5.9.5</u></p> <p>We have reproduced below a section concerning south Antrim which we find concerning on a number of levels.</p> <p><i>'Having conducted a detailed assessment of the fluvial flood risk to Glengormley and Mallusk, Rivers Agency has determined that potential flood alleviation scheme may be justified for this area.</i></p> <p><i>A feasibility study was carried out in September 2014 which identified a number of locations in the Glengormley and Mallusk area that are at risk from fluvial flooding. The feasibility study found that the source of the flooding was a number of designated and un-designated watercourses. The study produced a number of recommendations to alleviate the flooding within the study area.</i></p> <p>The recommendations regarding designated watercourses will be submitted to Rivers Agency's Capital Procurement Unit and the recommendations regarding un-designated watercourses will be presented to the Flood Investment and Planning Group, (FIPG). The findings of this will be taken into consideration in the final version of the FRMP (December 2015).'</p> <p>As we have mentioned above, here is a proposal which has been developed to a considerable degree apparently without any real environmental input, public participation, or transparency in making available the audit trail of the decision making process. We have selected this at random; there are other examples in the</p>	<p>As stated previously, the process for public participation in the consideration of relevant environmental issues for Rivers Agency's flood alleviation projects, whether they are signposted in the FRMPs or not, is governed by the Drainage (Environmental Impact Assessment) Regulations.</p>

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<p>report. Furthermore, it seems that this unseen work is to influence the final RBMP – to what extent?</p>	
<p><u>Pg 500 - Cl. 10.1 Monitoring</u></p> <p>We note that;</p> <p style="padding-left: 40px;"><i>'Progress on the implementation of these Plans will be reported on an annual basis to the European Commission through the normal reporting process.'</i></p> <p>Can we have an assurance that all such reports will be readily available to the public?</p> <p><u>Pg 500 - Annex H</u></p> <p>The <i>'Measures Activities'</i> column reflect the shortcomings of the early sections of the report. For instance under <i>'Flood Prevention'</i> and <i>'Flood Protection'</i> there is no mention of;</p> <p style="padding-left: 40px;"><i>'the retention and restoration of natural flood plains and natural watercourses as a form of flood alleviation'</i></p> <p>as set out in PPS 15</p> <p>Similarly, there is no mention of;</p> <p style="padding-left: 40px;"><i>'the promotion of sustainable land use practices, improvement of water retention as well as the controlled flooding of certain areas in the case of a flood.'</i></p> <p>as set out in The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009 set out in Clause 17 section 2b.</p>	<p>All information reported to the European Commission in relation to the progress on implementing the FRMPs will be publicly available.</p> <p>As stated previously PPS15 – Planning and Flood Risk is an important element of the FRMPs and should be viewed as a measure in itself.</p> <p>The Department's position in relation to this issue is stated above in the response to the UAF's comment titled <u>Pg 11 - Cl. 2.3.1 The Floods Directive</u></p>

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<p>5 Flood Risk Management Plan for Northern Ireland: Environmental Report</p> <p>This document has no page numbers and is consequently difficult to navigate and risks having missing pages.</p> <p>Clause 4.2 Table 5</p> <p>This table does not list the significant sources of information on baseline fishery data, i.e. DCAL, Lough Agency, AFBI.</p> <p>Clause 4.4 Table 6</p> <p>We are puzzled by the reference to 'fisheries practices' in para. 2 of the table. Please explain!?</p> <p>Clause 7.3 Table 9</p> <p>In respect of '<i>Environmental (including cultural heritage)</i>', the following comments apply;</p> <p>There is an unjustifiable limitation of environmental consideration to 'designated' and '<i>priority</i>' areas/species/habitats. There is a marked emphasis on this throughout the RA documents. This means that where a scheme is proposed which has none of these, environmental protection will be very limited or non-existent. There needs to be incorporated into the fabric of the documents a requirement to ensure protection of environmental factors irrespective of the degree of protection, if any. In fact the clause as written is meaningless because the protected</p>	<p>This matter will be addressed in the final FRMPs.</p> <p>The Table will be reviewed in the light of this comment.</p> <p>The reference to 'fisheries practices' includes for example, unsuitably sited fish farms or fisheries measures which may be considered unnatural under WFD.</p> <p>As stated previously in the responses to the comments titled Page 17 – Cl. 3.1 and Page 35 – Cl. 4.5, the Department is satisfied that the environmental impacts of all of its flood alleviation schemes are effectively assessed and managed through its compliance with the requirements of the Drainage (Environmental Impact Assessment) Regulations (Northern Ireland) 2006.</p>

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<p>areas/species/habitats will enjoy protection in any case simply by virtue of their designation.</p> <p>Clause - 7.4 Table 10</p> <p>At 'Surface Water Management' there seems to be a concerted effort to condemn SUDS. This is unwarranted and unjustified, flies in the face of PPS 15 and needs to be withdrawn.</p> <p>At 'Development outside Flood Risk Areas' there is an abrogation of interest and responsibility which is lamentable and which needs to be rewritten.</p> <p>At 'New Flood Alleviation scheme - Culvert works' the assessment summary is wholly inadequate as there is no mention of the often severe effects culverts have on environment and fisheries in particular</p>	<p>Regarding SuDS, the Department refers to its response to the UAF's comment titled 'Pg 17 - Cl. 3.1'.</p> <p>Regarding Culverts, the Department refers to its response to the UAF's comment below, titled Appendix 3.</p>
<p><u>Appendix 3:</u> <u>Summary of Plan Effects (by Measure Type) and Mitigation Measures</u></p> <p><u>Table 2: Summary of Effects of Culvert Works</u></p> <p>The 'Potential impact description' is completely unrealistic in that it glibly assumes all culverts will be designed and built well, observing;</p> <p style="text-align: center;"><i>'Adherence to PPGs and best practice regarding building materials and working practices around water courses'</i></p> <p>In fact in the real world it is a continuous struggle to avoid poor practice in the design and building of culverts. The end result is often simply a bad job.</p> <p>The '<i>Residual effect significance (with mitigation)</i>' is listed as '<i>Adverse</i>', which is realistic, but probably somewhat optimistic. In the early 21st century it is a disgrace that this situation is so glibly accepted as the norm. There is no need for this, much better can be done, but it needs a commitment on the part of RA which is simply</p>	<p>The Department recognises that the culverting of watercourses can be damaging to their ecological integrity and biodiversity. Therefore, the Department is committed to ensure that watercourses are only culverted for the purposes of flood alleviation when there is no practical alternative.</p> <p>The Department follows generic design guidance which has been agreed with DCAL, Inland Fisheries and aims to maintain sediment and fish passage continuity. In addition, for culverts over 900mm in diameter the Department sends information to Inland Fisheries and the applicant is required to contact Inland Fisheries or Loughs Agency, whichever is appropriate.</p>

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Respondent's Comments	Department's Response
not there at present	
<p>6 Flood Risk Management Plan for Northern Ireland: Habitats Directive Article 6 Assessment</p> <p>This document has no page numbers and is consequently difficult to navigate and risks having missing pages.</p> <p><u>Appendix 1: North West River Basin District HRA</u></p> <p>(This comment applies to all RBDs)</p> <p>Under '<i>Maintenance of channels</i>' there is a blanket assumption that there is a system for N2K assessments where maintenance works are programmed, and that this functions satisfactorily. This is not true. There are considerable ongoing problems in this process; the recent catastrophic work by RA on a tributary of the river Roe is but one example.</p> <p>While at least some of the responsibility for the problems lies with the inability of NIEA to administer the N2K protection, nevertheless there is a considerable problem within RA: the protection of environmental attributes is simply not good enough. The glib assumptions in the text across all RBDs are unwarranted and need to be qualified. Great improvement by RA is needed.</p> <p><u>Appendix 4: North West River Basin District Natura 2000 Sites</u></p> <p>(These comments apply to all RBDs)</p> <p>These RBD N2K Appendices are a curious confection; the sites are not in number, geographical, or alphabetical order. They appear to be a fairly random conglomeration of information.</p> <p>Perhaps this may explain the surprising omission of the river Faughan SAC;</p>	<p>This will be addressed in the final FRMPs.</p> <p>The Department carries out HRA assessments for any works, both maintenance and capital, which are within or adjacent to or hydrologically connected to N2K sites. This is in addition to the assent process required for N2K sites. The assessments are submitted to NIEA for approval.</p> <p>The matters referred to will be addressed in the final FRMPs.</p>

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<p>UK 0030361 River Faughan and Tributaries.</p> <p>The 'Qualifying features' column is questionable in that it fails to differentiate between species/habitats that are a primary reason for selection of the site, and species/habitats that are present as a qualifying feature, but not a primary reason for selection of the site. This should be corrected, along with showing whether Annex I or Annex II is applicable.</p> <p>There are a large number of blank pages included which relate to the Republic of Ireland, without explanation as to why this should be – is there any point in their inclusion ?</p>	<p>The information from the RoI is now available and will be incorporated into the final FRMPs.</p>

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Respondent's Comments	Department's Response
<p>Northern Ireland Environment Agency Water Management Unit (NIEA WMU) welcomes these plans, and notes in particular the importance of coordination with the River Basin Management Plans (RBMPs) as required under the Water Framework Directive (WFD). To this end, NIEA WMU notes the alignment of the spatial coverage of the plans with Neagh Bann, North Western and North Eastern River Basin Districts.</p> <p>The FRMPs identify the need to achieve the objectives of WFD in terms of good status as identified in the Environmental Objectives as set out in section 3.1. The measures in section 3.2 further emphasize this</p>	<p>In the interest of synergy, the River Basin Districts used in the implementation of the Floods Directive in Northern Ireland, are the same as those used by NIEA for the Water Framework Directive.</p> <p>As indicated the objectives and measures of the WFD would be taken into account in the flood risk management process and the Department would continue to work closely with NIEA to ensure that the WFD and FD would be successfully implemented.</p> <p>The Department is currently taking the lead in a trial catchment management plan for the Moyola River catchment through the inter-agency Catchment Oversight Group. This pilot study is</p>

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<p>through identification of Protection Measures for Catchment Based Management and Surface Water Management in section 3.2.2. NIEA WMU see the coordination of river basin and flood risk management planning as a important element in delivering both Directives, and the plans are key to ensuring that this link is clearly demonstrated to the European Commission (EC).</p> <p>As these measures are taken forward, there is an opportunity to further the understanding and implementation of Natural Water Retention Measures (NWRMs) and Sustainable Drainage Systems (SuDs) through multi-agency projects at a catchment scale, such as the Strategic Drainage Infrastructure Programme for the Belfast area. NRWMs have been highlighted in particular by the EC in its Communication on the Water Framework Directive and Floods Directive: Actions towards the 'good status' of EU water and to reduce flood risks (COM (2015) 120).</p> <p>In addition, strategic land use and planning policies across Northern Ireland could further consider the multiple benefits that may be gained through holistic and integrated catchment management. This may encompass influencing agricultural, forestry and upland land management schemes through countryside management strategies and rural development programmes in future.</p> <p>NIEA WMU welcomes the continued engagement with Rivers Agency through the interdepartmental Floods Directive Steering Group and the local Flood Forums. It also appreciates Rivers Agency engagement on the corresponding groups for WFD at interdepartmental, interagency and catchment stakeholder group level. In particular the work of the Inter-agency group on River Restoration and Continuity has provided a sound basis for developing catchment projects in future. In terms of implementation of the plans at a local level, lead contacts within NIEA WMU will be the three River Basin District Managers:</p>	<p>assessing the use of GIS to map information from a range of stakeholders, with the aim of identifying sites and projects where works may have benefits under a number of headings. In addition, the Department is also involved with the Blue Green Cities initiative.</p> <p>Strategic land use and planning policies involve DoE Planning Service as well as the core of the Department. The Department, through Rivers Agency, has had input into the revision of Planning Policy Statement 15, Planning and Flood Risk and would welcome a more holistic and integrated approach to these matters given that there would be potential benefits in the management of flood risk.</p> <p>It is envisaged that the Department would build on the successful co-operation and consultation to date with groups/forums, etc. and NIEA to implement the FRMPs.</p>

B9 Northern Ireland Environment Agency

Respondent's Comments	Department's Response
<p>North Eastern River Basin District:</p> <p>Mrs. Stephanie Millar Neagh Bann</p> <p>River Basin District: Dr. Bridgeen</p> <p>Magorrian North Western River Basin</p> <p>District: Mr. Kerry Anderson.</p> <p>Measures within draft River Basin Management Plans highlight the need for multi-agency working at a catchment level to deliver benefits for water status, morphology, flooding and fisheries through a coordinated, joined up approach. NIEA WMU looks forward to developing these partnership projects through the next plan period.</p>	

ANNEX C

List of Consultees Issued with Formal Notification of Public Consultation

General

Association of British Insurers	Lough Neagh Sand Traders Association
Ballinderry Fish Hatchery	Loughs Agency
Bann Systems Ltd	Met Office
Belfast City Centre Management	National Trust
Belfast Harbours Commission	NI Authority for Utility Regulation
Canoe Association of NI	NI Chamber of Trade
Chartered Institution of Water and Environmental Management(CIWEM)	NI Environment Link
Coleraine Harbour Commissioners	NI Fire and Rescue
Council for Nature Conservation and the Countryside	NI Tourist Board
Countryside Alliance	NIPSA Trade Union
DCAL Inland Fisheries	Northern Ireland Agriculture Producers Association
DOE NI Ireland Environment Agency	Northern Ireland Housing Executive
Drainage Council	Northern Ireland Water
DRD Water Policy Unit	OFMDFM Civil Contingencies Policy
DSD Weir Manager	PSNI
Federation of Lough Neagh and Lough Beg Wildfowlers	Public Health Agency
Engineers Ireland	River Bann and Lough Neagh Association
Freshwater Taskforce	Royal Yacht Association
GMB (Trade Union)	RSPB
HSENI	Rural Development Council
Inland Waterways Association	Rural Support
Institution of Civil Engineers	Shaftesbury Estate of Lough Neagh
Invest NI	Sports Council NI
Irish Amateur Rowing Union	Strangford Lough Wildfowlers and Conservation Association
Irish Water Ski and Wakeboard Association	The Honourable The Irish Society
Kilrea Angling Club	Ulster Angling Federation
Lands Tribunal	Ulster Coarse Fishing Federation
Lough Neagh Fisheries Co-operative Society	Ulster Farmers Union
Lough Neagh Rescue	Ulster Wildlife Trust
	Waterways Ireland
	World Wildlife Trust

OFMDFM GUIDANCE

Belfast Solicitors Association

CBI

Citizens Advice Bureau

Civil Law Reform Division

Departmental Library

District Judge (Magistrates Court)

Equality Commission

Federation of Small Businesses

General Consumer Council

HM Council of County Court Judges

Human Rights Commission

Law Centre

Law Society

Legal Deposit Libraries

National Library of Ireland

NI Chamber of Commerce and Industry

NI Council for Voluntary Action

NI Court Service (2)

NI Local Government Association

Northern Ireland Law Commission

Northern Ireland Ombudsman

Northern Ireland Publications

Resource (NIPR).

Queen's University, School of Law

University of Ulster, School of Law

The British Library.

The Executive Council of the Inn of Court of NI

The Library, Queen's University Belfast.

TSO Bibliographic Department.

Food Standards Agency

NIC/ICTU (Trade Union)

Society of Local Authority Chief Executives

HM Revenue & Customs

Ministry of Defence

Northern Ireland Judicial Appointments Commission

Catholic Bishops of Northern Ireland

Community Relations Council

Participation and the Practice of Rights Project

NI Executive

OFMDFM

Dept of Social Development

Dept of Enterprise Trade and Investment

Dept of Education

Dept of Regional Development

Dept of Employment and Learning

Dept of Environment

Dept of Health, Public Safety and Social Services

Dept of Agriculture and Rural Development

Dept of Culture, Arts & Leisure

Dept of Finance and Personnel

Dept of Justice

The Speaker of the Assembly

Assembly Departmental Committee

Assembly Business Office

Members of the Northern Ireland Assembly

Assembly Bill Office

Northern Ireland Assembly Library

Office of the Legislative Counsel

Northern Ireland Affairs Committee

Northern Ireland Office

Central Management Unit (CMU)

Legislative Programme Secretariat

Machinery of Government Division

[All Political Parties in NI Assembly](#)

[All Political Parties not represented in NI Assembly](#)

[All Northern Ireland MPs and MEPs who are not MLAs](#)

[All Political Parties Spokespersons](#)

[All MLAs](#)

[District Councils \(26\)](#)

[Section 75 Groups](#)

[Floods Directive Steering Group Members](#)

[Local Flood Forum Members](#)

ANNEX D

List of All Respondents

1. PSNI
2. Carrickfergus Borough Council
3. Craigavon Borough Council
4. Public Health Agency
5. Northern Ireland Housing Executive
6. Belfast City Council
7. AFBI , SAFSD Fisheries and Aquatic Ecosystems branch
8. Six Mile Water Trust (SMWT)
9. Armagh City, Banbridge & Craigavon Council
10. NI Water
11. NI Environment Agency
12. Mid and East Antrim Borough Council
13. Antrim & District Angling Association
14. Enagh Sustainable Development Forum / Holy Well Trust + Freshwater Taskforce
15. DHSSPS
16. Loughmacrory & Murrins District Angling Association
17. The Consumer Council
18. Ulster Angling Federation
19. Freshwater Taskforce
20. Natural Living Assets – Mr Brendan Kerr

21. Northern Ireland Fire & Rescue Service
22. Ulster Farmers' Union
23. Fermanagh & Omagh District Council
24. UKIP (UK Independence Party)
25. ICE NI (Institution of Civil Engineers)
26. DOE Planning Policy Division
27. Dept for Regional Development
28. Antrim and Newtownabbey Borough Council