

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

Consultation Response Form

Responses should be received no later than
Friday 25 June 2021

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

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

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

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

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

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

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

Writing to:

Flood Risk Management Plan Consultation Response

Department for Infrastructure

Water and Drainage Policy Division

Room 1-22, Clarence Court

10-18 Adelaide Street

BELFAST

BT2 8GB

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

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

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

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

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

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

I am responding

As individual

On behalf of an organisation

Your Details

Name: Fermanagh and Omagh District Council

Postal address (including postcode): Townhall, 2 Townhall Street, Enniskillen BT74 7BA

Email address: charlotte.daly@fermanaghmagh.com

Please select from which of the following groups you belong to

- Individual
- Individual at perceived flood risk
- Utilities/Infrastructure provider
- Business sector
- Consultant / Contractor
- Environmental management
- Academia/Research
- Farming / Land management
- Local Government
- Central Government
- Leisure / Tourism
- Manufacturing
- Transport / Navigation
- Developer
- Other (*please specify*)

After the 6 month consultation period we will publish our response document and will let you know what people have said, how we have taken their comments into account and what changes will be made before we publish the final FRMP, SEA and HRA by 22 December 2021.

Freedom of Information Act 2000 – Confidentiality of Consultations

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

Questions on the Draft Flood Risk Management Plan

Question 1

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

Yes

No

If not, please give your reasons below.

Enter text here

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

Enter text here

Question 2

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

Yes

No

If not, please give your reasons below.

Enter text here

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

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Question 3

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

Yes

No

If not, what could be done to redress the balance? Please give your views below.

Enter text here

Question 4

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

Yes

No

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

Omagh (page 208) - With regard to the prevention measure "By 31 March 2027, NI Water will produce an enhanced DAP (Drainage Area Plan) for Omagh that sets out actions to mitigate integrated flooding issues". Council welcomes this prevention measure as surface water flooding, in a high probability event, is the predominant risk for the Omagh area. Council would however ask that consideration is given to bringing the timescales forward for this work to reflect the acknowledged risk.

Council also wishes to highlight its continued support for further feasibility work with regards to a flood alleviation scheme for Omagh Town Centre. In recent years the existing flood defences in Omagh have come extremely close to overtopping and going forward are likely not be able to withstand the increasing impacts which climate change may bring. Any significant fluvial

flooding event will have devastating consequences for Omagh Town Centre residents and businesses and a flood alleviation scheme would provide a vital first line of defence.

At Chapter 5, Page 208, a measure is prevention measure summary for Omagh is identified as "Influence local planning policy for development and flood risk" and the specific measures states that "By 2024, DfI Rivers will work with Fermanagh and Omagh District Council to update flood risk policy in the Local Development Plan." It is unclear if it is the intention of DfI Rivers to update policies further to those comments already provided to-date as part of the LDP preparation process. This council has already been working closely with DfI Rivers on the wording of the Flood Risk Management planning policies for the District, and the draft Plan Strategy is now with the Planning Appeals Commission to cause an Independent Examination. Given the stage we are at in the LDP process, it is suggested that the timing of this specific measure around the influencing of planning policy for development and flood risk should be revisited to align with the council's LDP Timetable. If however it is the intention of DfI Rivers to influence planning policy further beyond the comments that have been provided thus far then this should be clearly stated and also communicated to the Council's planning department.

It is also noted at Page 207, paragraph 5.9.7.11 that the Plan Strategy is referred to as "a Plan Strategy to define strategic objectives for future development of the District, including strategic policies and a spatial strategy;" It is important that the role of the two stages of the LDP process are fully understood and reflected in this draft Flood Risk Management Plan (FRMP). The FODC Plan Strategy contains both a suite of strategic planning policies and also detailed policies to guide development. Paragraph 5.9.7.1.1 also needs to be updated to reflect the correct timescales from the most recent LDP Timetable.

At Page 204 paragraph 5.9.6.1 under the heading of Planning, the document explains in addition to national planning policy and advice, DfI Rivers will advise against bringing forward sites or the zoning of any land in preparation for the new Fermanagh and Omagh District Council Local Development Plan, particularly for built development, that has been identified from the flood maps as being within the 1 % AEP (1 in 100 year) fluvial floodplain, 0.5 % AEP (1 in 200 year) reservoir inundation area, or is susceptible to surface water flooding. It is worth noting that the strategic planning policy within the SPPS states that "LDPs should apply a precautionary approach to development in areas that may be subject to flood risk presently or in the future as a result of climate change predictions. Consequently, LDPs should not bring forward sites or zone land that may be susceptible to flooding, now or in the future, unless in exceptional circumstances." It is noted that 'exceptions' are not referred to in the 'planning' section of this draft FRMP and it would be helpful to understand if this is intentional.

Question 5

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

Please explain what they are and why they should be given a high priority?

Preparedness, protection and prevention measures are of equal importance. We acknowledge that prevention through planning policy is a vital measure, although unfortunately flooding events will still happen. When flooding events do happen, activities which have been carried out in relation to protection and preparedness will be of significant importance in terms of helping to mitigate against the potential devastating impacts of flooding in Omagh. An Enhanced Drainage Area Plan and Implementation of a Flood Alleviation Scheme for Omagh as well as the update to Flood Risk Policy are all high priority actions and should be treated accordingly.

The Omagh Community Resilience Group for the Campsie area of Omagh was established in 2016 and the community has benefitted from the addition of a sandbag container in a nearby car park as well as residents signing up to receive weather warning and informing information via email and text. On page 206 of the document it is stated that 'this resilience group differs from others in NI, because it is represented predominantly by owners of commercial rather than residential properties'. The Council's experience through our links with this group is that it is mainly made up of owners of residential properties. Also we would like to highlight that at a meeting with this group in March 2020 which DfI Rivers, Roads, NI Water and the Council attended, the residents expressed their frustrations at being unable to source affordable home insurance even with the FloodRe scheme in place. The group reported that some residents have to consider purchasing home insurance with the flood risk element removed due to cost.

Question 6

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

Yes

No

If yes, explain what could be done.

The Council has worked closely with the RCRG to facilitate and assist local Community Resilience Groups in the District.

The Council will continue to play a key role in supporting the management of flood risk through membership of the Southern Emergency Preparedness Group and welcomes the breadth and scope of the plan objectives as referenced in Table 4-1.

Council looks forward to working with DfI in the development of the plan over the coming years.

Question 7

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

Yes

No

If yes, explain what could be done.

Council recognises the multi-agency partnership working already in place to respond to and mitigate against flooding across the District and is committed to continuing our involvement in this partnership.

Questions on the environmental reports (SEA and HRA)

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

Question 8

Do you agree with the conclusions of the environmental reports?

Yes

No

If not, please explain why.

Enter text here

Question 9

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

Yes

No

If yes, please describe what they are.

Enter text here

Question 10

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

Yes

No

If yes, please explain.

Please sent the completed form to:

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

Post to:

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