

**Cllr Naomi Long MLA
Alliance Party Deputy Leader
Assembly Member for Belfast East**

Mr Keith Hunt
Water Regulation Directorate
Northern Ireland Utility Regulator
Queens House
14 Queen Street
Belfast BT1 6ED

Monday, 2nd November, 2009

Our ref: L021109

Dear Mr Hunt,

Response to NIAUR Draft Determination on NIW PC10 Business Plan 2010-2013

I am writing in support of DRD Northern Ireland Water's application for investment of £20 million under PC10 for flood alleviation works in East Belfast.

There is a significant problem with repeated out-of-sewer flooding in East Belfast which would appear to be a direct result of underinvestment in infrastructure which is becoming increasingly less efficient at managing heavy rainfall and sewage. Whilst initially the problem was attributed to exceptional weather conditions, the increasing frequency of out-of-sewer flooding in even relatively low intensity and duration rainfall is indicative of underlying under-capacity or poor condition sewerage and drainage. Furthermore, whilst there are identifiable flooding hot-spots, their wide distribution throughout the constituency and their number would indicate that significant investment will be required to implement the Drainage Area Plan which is currently being developed for the area in order to address what is increasingly becoming a serious public health issue in the area.

There has been significant development throughout East Belfast, leading to more paved areas and fewer soak-aways and investment in the drainage and sewerage networks has not kept pace with that growth and change. The cost to the householder and to business of each of these flooding events, in terms of damage and disruption is significant, with some properties experiencing flooding up to 6 times in the last 3 months. It is also becoming a barrier to future development and investment, as it is becoming difficult to justify continued growth in light of the obvious pressure which is being placed on infrastructure. It is, therefore, imperative that Water NI is properly resourced to deal with this issue promptly, and in close collaboration with the Rivers Agency and DRD Roads Service, as the various drainage networks for which they have responsibility are interconnected.

In light of this, I also welcome the DARD Rivers Agency and Connswater Community Greenway joint initiative which will include a flood alleviation scheme in addition to the construction of the Connswater Community Greenway which will serve to enhance biodiversity and promote safe, green alternative means of commuting.

The Flood Alleviation Scheme will entail river realignment, the replacement of a number of road culverts, in addition to the construction of flood embankments and flood walls which should facilitate efficient drainage of storm flows and assist with some of the flooding from non-sewer sources which has also been affecting my constituents.

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In addition, during consultation undertaken by NI Water, many respondents had called for an improved strategy to tackle pollution from sewage discharges to inland waterways, recognising the impact of this upon water quality and the environment.

Further to recent reports in the media criticising the amount of pollution to the Connswater System, an issue which the North Eastern Draft River Basin Management Plan seeks to address, a number of respondents have raised the impact which pollution has on biodiversity and wildlife in the rivers as a concern. To this end, the implementation of the East Belfast Drainage Area Plan should be given high priority and a programme of works developed to help address both flooding and discharges from combined sewer overflows. Key to this is the proposal to remove 14 combined sewer overflows that discharge sewage directly into the rivers during periods of prolonged/heavy rainfall.

I, therefore, request that priority be given to the Loop, Knock and Connswater Systems in order to address the issues highlighted above and to maximise the benefits of investment from other stakeholders thus far.

I would also ask that Rivers Agency and NI Water coordinate their programmes of works insofar as is possible to simultaneously address out-of-channel flooding and out-of-sewer flooding, respectively. In particular, The East Belfast Drainage Area Plan will be crucial to the development of a sustainable Connswater Community Greenway and work undertaken by NI Water will directly impact upon ongoing management and maintenance costs which Belfast rate-payers will ultimately incur.

Best regards,



Cllr Naomi Long MLA