

**Northern Ireland Water**

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Lisburn and Castlereagh City Council,  
 Local Development Plan Team,  
 Civic Headquarters,  
 Lagan Valley Island,  
 Lisburn,  
 BT27 4RL.

Date: 10<sup>th</sup> January 2020

Dear Sir / Madam,

**Comments on the Lisburn and Castlereagh City Council LDP Draft Plan Strategy**

**GENERAL COMMENTS**

NI Water has reviewed the contents of the Lisburn and Castlereagh City Council Draft Plan Strategy. Based on its assessment against the tests for soundness in accordance with DfI Development Plan Practice Note 6 v2, NI Water has concluded that in general this Draft Plan Strategy is sound.

Nevertheless, NI Water has proposed some minor changes, these changes can be incorporated in accordance with normal consultation processes and none of these changes would indicate that the Draft Plan Strategy is unsound. Some general comments are listed in bullet points below:

- The Council has taken into account all relevant Regional and Local Policies including Sustainable Development Strategy 2010, Regional Development Strategy 2035, Ensuring a Sustainable Transport Future: A New Approach to Regional Transport, Sustainable Water – A Long Term Water Strategy for NI 2015-2040 etc. However, NI Water would like to propose an additional Regional Programme to be added to this list. This will be discussed later in this document under proposed amendments.

- Predicted population growth is in accordance with the 2016 based NISRA Population Projections and confirms an increase of 12% by 2032 resulting in an estimated total of 159,847.
- Throughout the LDP process, NI Water has liaised closely with Council providing data regarding current and predicted future status of existing NI Water wastewater and water infrastructure and notes the inclusion of this data in the various Draft Plan Strategy Appendices.
- Housing needs are well documented in Technical Supplement 1. In particular, it is good to see some granularity when it comes to housing allocation throughout the city, greater urban areas, various towns, villages and small settlements.
- Council has promoted Sustainable Urban Drainage System (SuDS) solutions in respect of surface water drainage and many references are evident throughout the Draft Plan Strategy document. In particular, Council recognises the potential harmful impacts of surface water flooding and will seek to promote a more sustainable approach to drainage and flood risk management. NI Water supports approach. However, NI Water would have like to have seen a Sustainable Urban Drainage System Policy included within the Draft Plan Strategy document. This will be discussed later in this document under Proposed Amendments.
- Operational Policy WM5 Development in the Vicinity of Waste Management Facilities or Wastewater Treatment Works is noted and welcomed. However, NI Water would like to propose an amendment to the Justification and Amplification text. This will be discussed later in this document under Proposed Amendments.
- Operational Policy FLD5 Development in Proximity to Reservoirs is noted. Should Council wish to include a list of reservoirs, dams and other impounding structures as defined by the Reservoirs Act (Northern Ireland) 2015, NI Water would be happy to forward a list of such NI Water assets.

## **PROPOSED AMENDMENTS FOR CONSIDERATION**

### **Chapter 2 Policy and Spatial Context.**

The list of key policy and guidance documents should include Living with Water Programme. Effective drainage and flood prevention is essential as it protects public health, our vital infrastructure like hospitals, electrical sub-stations, transport links, our homes and the environment in which we live. Existing drainage infrastructure needs significant future capital investment in order to reduce the risk of flooding, enhance the environment and allow for continued economic growth. Department for Infrastructure's Water and Drainage Policy Division is leading the Living with Water Programme (LWWP) to deliver a Strategic Drainage Infrastructure Plan for Belfast including part of Lisburn and Castlereagh City Council area. By working together to deliver integrated sustainable solutions to today's problems and addressing future needs, the cost of capital works required can be reduced, flood risk can be managed, our environment enhanced and the local economy can grow.

### **Sustainable Urban Drainage System Policy**

Although Council has promoted Sustainable Urban Drainage System (SuDS) solutions in respect of surface water drainage and many references are evident throughout the Draft Plan Strategy document, there is no Sustainable Urban Drainage System Policy included within the Draft Plan Strategy document. NI Water advises that a SuDS policy should be developed as part of the Local Development Plan as it would influence developers to use SuDS as the preferred drainage solution. This is particularly relevant for areas susceptible to surface water flooding and for relatively large developments where the benefits are likely to be greater and SuDS easier to facilitate. The SuDS policy should also identify the difference between 'soft' and 'hard' SuDS, providing examples of each; and confirm that an appropriate SuDS maintenance and management plan will be required to be submitted with the Planning Application.

**Operational Policy WM5 Development in the Vicinity of Waste Management Facilities or Wastewater Treatment Works.**

As a consequence of the issues relating to odour and odour management and the increasing significance of odour management within the water industry NI Water has developed a policy on Development Encroachment/Odour Assessment. This policy has replaced the old cordon sanitaire procedures. NI Water proposes that within Operational Policy WM5 a reference is made to the NI Water Development Encroachment – Odour Assessment Policy and Procedure.

Please contact either myself or [REDACTED] (Senior Planner; [REDACTED]) should you wish to discuss NI Water’s response to the Lisburn and Castlereagh City Council Draft Plan Strategy.

Yours sincerely,

Head of Investment Management  
Asset Delivery Directorate

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