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Antrim and Newtownabbey Borough Council,
 Planning Department,
 Mossley Mill,
 Newtownabbey
 BT36 5QA

Date: 20th September, 2019

planning@antrimandnewtownabbey.gov.uk

Dear Sir / Madam,

Comments on the Antrim and Newtownabbey Borough Council LDP Draft Plan Strategy

Thank you for the opportunity to review and comment on the content of the Antrim and Newtownabbey Borough Council LDP Draft Plan Strategy. Based on its assessment against the tests for soundness NI Water has concluded that in general this Draft Plan Strategy is sound.

However, 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 have taken into account all relevant Regional and Local Policies including Programme for Government, Regional Development Strategy 2035, Sustainable Water – A Long Term Strategy for Northern Ireland 2015-2040, Council Corporate & Community Plans, Belfast City Deal and legacy Council Development and Master Plans.
- Predicted population growth is well within original NISRA estimates (2.7%) and the methodology used is well documented and clearly stated in Evidence Paper 1 – Population.
- Housing need is also well documented in Evidence Paper 6 – Housing. It is good to see some granularity when it comes to housing allocation throughout the various metropolitan areas, towns, villages and small settlements. The allocation of housing growth to each settlement and the countryside is based

on the Spatial Growth Strategy for the Borough. It is noted and welcomed that 87% of housing growth will be allocated to Metropolitan Newtownabbey, Antrim, Ballyclare, Crumlin & Randalstown.

- Throughout the LDP process, NI Water has liaised closely with Council providing data regarding current and predicted future status of existing NI Water water and wastewater infrastructure. In accordance with the NI Water data returns, Draft Plan document (page 51, paragraph 2.84) has highlighted those WWTWs where currently there is no capacity.
- In Section 6 – Transport and Infrastructure NI Water welcomes inclusion of DM 14.4 – Development in the vicinity of a wastewater treatment works. However, this paragraph does not fully align with current NI Water policy. A proposed amendment to this paragraph will be discussed later in this document.
- The Council has heavily 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. In Section 13 – Environmental Resistance and Protection NI Water welcomes the inclusion of Policy DM 47: Surface Water Drainage and Sustainable Drainage Systems. In particular, it is welcomed that DM 47.6 states ‘All SuDS schemes will need to be accompanied by an appropriate management plan (including arrangements for long term maintenance).’ However, NI Water would like to propose some minor amendments to the text within paragraph DM 47.5 which will be discussed later in this document.
- Section 13 also includes Reservoir Flood Risk, the aim of which is to minimise potential flood risk for developments in close proximity to controlled reservoirs. NI Water proposes to amend the list of Controlled Reservoirs in paragraph 13.35 (page 295). This will be discussed later in this document.



PROPOSED AMENDMENTS

Policy DM 14: Public Utilities and Infrastructure

DM 14.4 states *'Proposals involving development within 300m of a waste water treatment works will only be permitted where this will not compromise or unduly restrict activities at the site and it is demonstrated there will not be a resulting loss of amenity from smell nuisance to the occupants/users of the proposed new development.'*

This Detailed Management Policy does not fully align with the current NI Water policy regarding development encroachment.

Currently NI Water has odour consultation zones around all wastewater treatment works (WWTWs) and wastewater pumping stations (WWPSs). The area of these zones in respect of WWTWs is directly related to the size (by population equivalent (PE)) of the WWTW. For example, WWTWs greater than 250 PE, the boundary of the consultation zone is 400m offset from the WWTW boundary fence. For WWTW between 50 and 250 PE, the offset is 200m from the WWTW boundary fence; and, for WWTW less than 50 PE, the offset is 100m from the WWTW boundary fence. For WWPS, the boundary of the consultation zone is 35m offset from the WWPS boundary fence.

During the statutory planning consultation process, NI Water will confirm to Council Planning Team if a proposed development is located within a consultation zone. If it is, the Developer will be required to request NI Water to carry out a specific Odour Assessment in accordance with NI Water Odour Assessment Procedure. The Odour Assessment Procedure may recommend the need for the developer to procure an Odour Dispersion Model and Report to NI Water specification and requirements. The Odour Dispersion Model and Report will determine the 'Area of Development Restraint' and what, if any, mitigation measures it may be possible for the Developer to provide.

NI Water would propose that the text of Policy DM 14.4 is amended to fully align with current NI Water Development Encroachment – Odour Assessment Policy.

Policy DM 47: Surface Water Drainage and Sustainable Drainage Systems

NI Water welcomes the inclusion of Policy DM 47: Surface Water Drainage and Sustainable Drainage Systems (SuDS). Since 23 March 2016, NI Water (in accordance

with The Water and Sewerage Services Act (Northern Ireland) 2016) is required to adopt 'hard engineered' SuDS providing the SuDS has been constructed to an adoptable standard. It is therefore important to list examples of a wide range of both soft and hard-engineered SuDS options. DM 47.5 lists a number of SuDS measures to assist minimising flood risk. Most of these SuDS measures are 'soft' SuDS examples. NI Water would propose that examples of 'hard engineered' SuDS i.e. oversized surface water sewers with flow control and attenuation tanks should be included in this list of SuDS measures to assist minimising flood risk.

Policy DM 48: Reservoir Flood Risk

The aim of this policy is to minimise potential flood risk for developments in close proximity to controlled reservoirs. Controlled Reservoirs are water impounding structures designed to hold in excess of 10,000m³ of water above the natural level of the surrounding ground. Paragraph 13.35 lists 12 Controlled Reservoirs located within the Borough all of which are impounded bodies of open water. However, NI Water has a very large service reservoir located at Hydepark Road, Newtownabbey (Irish Grid Reference 329065, 382612). This is a covered concrete reservoir receiving pumped flow Dunore Point Water Treatment Works and has a capacity of 120,630m³. NI Water would therefore advise that Hydepark Service Reservoir is added to the list of Controlled Reservoirs in paragraph 13.35.

Please contact either myself or Alan Moore (Senior Planner; alan.moore@niwater.com) should you wish to discuss NI Water's response to the Antrim and Newtownabbey Borough Council Draft Plan Strategy.

Yours sincerely,



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