



**Causeway
Coast & Glens
Borough Council**

Planning Department
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Date: 4th November
2021
Tel: 028 7034 7137

Dear Eddie,

Re: Sustainable Water: A Long-Term Water Strategy (LTWS) for Northern Ireland – CC&GBC 10th update (as of 30th September 2021).

Thank you for your correspondence dated 15th October 2021 in relation to the above.

The key LTWS policies and updated comments (as of 30th September 2021) relating to the functions of the Council are as set out in the attached SIAP: Annex A. The additional information you requested to accompany this is as follows:

(i) identify where the Strategy has added value and driven different behaviours;

To achieve the vision of a sustainable water sector, 'Sustainable Water: A Long-Term Water Strategy for Northern Ireland (LTWS)' encourages a sustainable and integrated approach to managing all our different water needs in a way which promotes regional development without compromising the environment or increasing flood risk.

In relation to the Council's planning function, DfI hope that the Strategy will "*Ensure existing water and sewerage infrastructure and investment proposals inform future planning decisions.*" This includes both Development Plan (through planning policy) and Development Management (application of policy and, enforcement procedures) functions.

The Strategy outlines five key principles and a focus on its four high-level aims, which are to:-

- provide high quality sustainable supplies of drinking water to households, industry and agriculture;
- manage flood risk and drainage in a sustainable manner;
- achieve the environmental requirements of the Water Framework Directive in a sustainable manner; and

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- provide sustainable water and sewerage services that meet customers' needs.

At a meeting held in September 2018 DfI provided further clarity on the strategy actions relating to the Council's planning function, climate change, managing flood risk, reservoir safety, sustainable drainage systems, capacity at wastewater treatment works and reservoirs. This engagement has also helped inform the Council's Local Development Plan (LDP).

To assist Council planning departments in the preparation of their LDPs, DfI encourages:

- compliance with 'water & drainage' issues contained in LTWS;
- continued engagement between councils and NI Water on available capacity in wastewater treatment works when zoning land for potential development; and
- greater use of SuDS and blue/green infrastructure.

The Strategy has added value in that it assists the Council in its understanding of how its functions fit into and, have a part to play in, the provision of a sustainable water sector, both locally and regionally.

The Council, in preparing its LDP, is legislatively required to take account of policy and guidance issued by DfI. In fulfilling this requirement, the Council has taken the Strategy into account in the preparation of its Preferred Options Paper (POP). The LTWS is also informing the next stage of Plan making – the Draft Plan Strategy. The Council's planning department has and will continue to consult with the relevant government departments and other key stakeholders, at key stages of its Plan-making programme.

In carrying out its Development Management functions, the Council is required, in its decision-making, to assess proposals against current regional policy set out in the Strategic Planning Policy Statement for Northern Ireland (SPPS) and Revised Planning Policy Statement (PPS) 15: Planning and Flood Risk, as well as any other relevant guidance issued by the Department. Where a planning breach has occurred or where unauthorised work has been carried out, the Council has, and will continue to, pursue enforcement action where it considers it expedient to do so.

The LTWS has driven a different behaviour to the Council's Plan-making process, with a new emphasis on the need to plan for a sustainable water sector in our Borough and the part this plays in achieving a regionally sustainable sector. Although our Draft Plan Strategy is not yet published, the evidence base, including consultation with NI Water and DfI is suggesting that this would include policies on Blue/Green infrastructure, Flood Risk Management and Public Utilities, including the consideration and use of SuDS in all development proposals, where possible and at an appropriate scale. A 'mitigating and adapting to Climate Change' theme will also run throughout the LDP.

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Consequently, this will also result in different behaviours by our Development Management section who will assess proposals against any such LDP policies, when adopted.

However, it should be noted that this topic requires further consideration and will be progressed through the Council's LDP Project Management Team, in consultation with both DfI and NI Water and other key stakeholders as well as our Elected Members.

In relation to the Council's Environmental Health function, no complaints have been received or investigated with respect to non-compliance with the Detergents Regulations 2010. Consideration will be given to the inclusion of detergents as part of the Council's sample and testing schedule during 2021-2022 Health restrictions permitting.

(ii) highlight emerging issues;

One cross-cutting emerging issue is the potential effects of climate change on our society, economy and environment and the need for effective planning policies to ensure that we all play our part in mitigating and adapting to such changes.

The Strategy also contributes to the delivery of a number of the Outcome Objectives listed in the NI Climate Change Adaptation Programme 2019-2024 (NICCAP2) (DAERA), a number of which are also planning-related (e.g. IF1 & P1).

Another emerging issue is that of waste capacity (both pipes and treatment works) and the impact of this on decision making through the planning (development management) process, and the zoning of land through the LDP process.

(iii) where possible, identify a proactive approach to new issues;

To deliver the proposals set out in the LTWS, the Strategy seeks to develop cross departmental working and stakeholder partnerships within the water sector to ensure we meet our environmental obligations in an affordable manner whilst continuing to meet the water and sewerage needs of society (households, agriculture and industry).

The Strategy encourages further involvement by local councils, particularly in relation to their planning, environmental health and leisure activities, and this partnership will evolve as the actions are progressed.

The Council is currently working through a review of current topics, as set out in the SPPS, including: Mitigating and Adapting to Climate Change. The Council is proactive in the work undertaken through its LDP Project Management Team

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(PMT) in line with its published Statement of Community Involvement in Planning (SCI), working with key consultees and stakeholders in the drafting of its LDP Policies, including (but not limited to) DfI and NI Water.

(iv) set out funding / resource implications;

There are no funding/resource implications to report at this time.

Council continues to carry out work to support the Drinking Water Inspectorate (DWI) via a Service Level Agreement (SLA) to carry out risk assessments, sampling and follow up investigations of the currently known supplies (domestic and commercial) within the area. The detail required and the technology used to complete and record such work has increased which DWI have acknowledged and provided additional support to ensure Councils can deliver the required service. Regular meetings are held to consider and resolve any strategic or operational matters.

(v) identify references in the Strategy which may be hindering work being taken forward.

There are no references hindering work at this time. This will, however, be kept under review.

(vi) identify if Brexit or the COVID-19 pandemic, has had an impact on the delivery of actions.

The Council had commenced a series of LDP PMT meetings in early 2020. However, due to social distancing measures brought in by the government, in response to the Covid-19 outbreak, these meetings were postponed. Instead, consultation is taking place electronically. A revised LDP Timetable was published w/c 24th May 2021. This is unlikely to affect the Council's ability to meet the targets set out in this Action Plan as they are in the medium-long term.

The sampling of private water supplies and completion of risk assessment for low-risk sources was curtailed during 2020-2021 due to Covid-19 restrictions. However, with the easing of restrictions, the completion of a recovery plan and risk assessments to ensure staff and public safety, this programme has since been re-introduced.

Yours sincerely

Denise Dickson

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Head of Planning

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Long-Term Water Strategy - Actions for Local Councils

Short Term (2015-2021)

Medium

AIM	POLICY	ACTIONS	ACHIEVEABLE TIMEFRAME (Short / Medium / Long)	LEAD DEPARTMENT DELIVERY BODY
DW AIM 2: Meet the Water Demand needs of Society, the Economy and the Environment				
DW Aim 2	DW 2A: Provide access to efficient, safe, secure drinking water supplies	DW 2A (ii) Consider improved mechanisms to ensure that NI Water and Planning Authorities effectively integrate water investment and development plans and ensure customers' water needs are efficiently met in the future	Medium-Long term	NIW / Local Councils

FRMD Aim 1: Deliver Sustainable Flood Resilient Development

<p>FRMD Policy 1A</p>	<p>To ensure land-use planning decisions are informed to help minimise flood risk.</p>	<p>FRMD 1A (i) Prevent inappropriate development in high risk areas and ensure that future development does not increase flood risk.</p> <p>FRMD 1A (ii) Land-Use planning decisions must continue to be informed by up-to-date information on the risk from all significant sources of flooding</p> <p>FRMD 1A (iii) Any exceptional development permitted within high flood risk areas must make provision for adequate mitigation measures commensurate with flood risk to the development and elsewhere as a result of it.</p>	<p>Short</p>	<p>Local Councils</p>
<p>EP Aim 3: Effective and Efficient Wastewater Collection and Treatment</p> <p>EP Policy 3A</p>	<p>Educating consumers to prevent inappropriate items entering the sewerage network</p>	<p>EP 3A (iv) Consider measures to effectively enforce detergent regulations to ban the sale of domestic detergents containing more than 0.4%* phosphorus to reduce the amount of phosphorus entering the water environment.</p>	<p>Short</p>	<p>DfI Strategic Planning Division / Local Councils</p>

<p>EP Policy 3B</p>	<p>Efficient, effective and compliant wastewater treatment</p>	<p>EP 3B (v) Future development plan zonings should make provision for both wastewater treatment facilities and sustainable drainage systems (FRMD Policy 1B).</p>	<p>Medium-Long term</p>	<p>Local Councils / NIW / Dfi WDPD / DAERA (RU)</p>
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Causeway Coast and Glens

SUGGESTED SUPPORTING DEPARTMENT / ORGANISATION	PROGRESS COLOUR CODE (Green / Amber / Red) at 31 Mar 2019	Position at 31 Mar 2019	PROGRESS COLOUR CODE (Green / Amber / Red) at 31 Mar 2021
DAERA (RU) / CCNI		This is being progressed through the LDP Process in consultation with DFI and other key stakeholders	

DfI Rivers / NIW		Undertaken through the Development Management Process	
DfI Rivers		Undertaken through the Development Management Process	
DfI Rivers / NIW / WI		Undertaken through the Development Management Process	
		This is a function of the Council's Environmental Health Section	

This is being progressed through the LDP Process in consultation with DFI and other key stakeholders

DFI Strategic Planning
Division

Position at 31 Mar 2021	PROGRESS COLOUR CODE (Green / Amber / Red) at 30 Sep 2021	Position at 30 Sep 2021
<p>This is being progressed through the Council's Local Development Plan (LDP) Process. A Revised LDP Timetable was published on 25th November 2019:</p> <p>https://www.causewaycoastandlens.gov.uk/uploads/general/LDP_Revised_Timetable_(2)_Final_(Published)_251119.pdf . NB: the end date of the Plan has changed from 2030 to 2035. This brings the actions into the medium-long term (column D of the table has been amended to reflect this). We are currently working on the preparation of a Draft Plan Strategy, seeking input to our draft policies from relevant consultees and stakeholders including DAERA, Dfi and NIW through the LDP Project Management Team (PMT). A series of PMT meetings had commenced and were due to continue throughout 2020. However, due to social distancing measures brought in by the government, in response to the Covid-19 outbreak, we were unable to hold a number of planned meetings. Instead, consultation is taking place in writing and/or via teleconferencing. Our consultees/stakeholders are also experiencing workplace changes as a result of the government advice, so their response times have been impacted. As a result</p>		<p>This is being progressed through the Council's Local Development Plan (LDP) Process. A Revised LDP Timetable was published w/c 24th May 2021</p> <p>https://www.causewaycoastandlens.gov.uk/uploads/general/LDP_Revised_Timetable_(FINAL)_agreed_March_2021.pdf NB: the end date of the Plan has changed from 2030 to 2035. This brings the actions into the medium-long term (column D of the table has been amended to reflect this). We are currently working on the preparation of a Draft Plan Strategy, seeking input to our draft policies from relevant consultees and stakeholders including DAERA, Dfi and NIW through the LDP Project Management Team (PMT). A series of PMT consultations is ongoing (electronically). The Council will keep its LDP Timetable under review over the next few months. However, this is unlikely to affect the Council's ability to</p>

On track. Undertaken through the Development Management Process		On track. Undertaken through the Development Management Process
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Any complaints received regarding non-compliance with the Detergent Regulation 2010 will be investigated and action taken in line with the Council's Enforcement Policy. Note: None received to date.		Any complaints received regarding non-compliance with the Detergent Regulation 2010 will be investigated and action taken in line with the Council's Enforcement Policy. Note: None Received to date.

This is being progressed through the Council's Local Development Plan (LDP) Process. A Revised LDP Timetable was published w/c 24th May 2021

[https://www.causewaycoastandleisure.gov.uk/uploads/general/LDP_Revised_Timetable_\(FINAL\)_agreed_March_2021.pdf](https://www.causewaycoastandleisure.gov.uk/uploads/general/LDP_Revised_Timetable_(FINAL)_agreed_March_2021.pdf) **NB:** the end date of the Plan has changed from 2030 to 2035. This brings the actions into the medium-long term (column D of the table has been amended to reflect this). We are currently working on the preparation of a Draft Plan Strategy, seeking input to our draft policies from relevant consultees and stakeholders including DAERA, DfI and NIW through the LDP Project Management Team (PMT). A series of PMT consultations is ongoing (electronically). The Council will keep its LDP Timetable under review over the next few months. However, this is unlikely to affect the Council's ability to

