

**Hannah Flynn**

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**From:** McCartan, Fiona <Fiona.McCartan@infrastructure-ni.gov.uk> on behalf of Beggs, Alistair <Alistair.Beggs@infrastructure-ni.gov.uk>  
**Sent:** 03 February 2022 17:14  
**To:** Maura Fox  
**Cc:** Proinsias McCaughey; Local Development Plan  
**Subject:** DFI comments to DCSDC Proposed Changes Consultation - 03.02.22  
**Attachments:** DCSDC DPS Proposed Changes Consultation Response Cover Letter.pdf; Dfi comments to DCSDC Proposed Changes Consultation FEB 2022.pdf; TPMU - DCSDC Schedule of Proposed Changes to DPS.pdf; Rivers - DCSDC Schedule of Proposed Changes to DPS.pdf; Roads - DCSDC Schedule of Proposed Changes to DPS.pdf; WDPD - DCSDC Schedule of Proposed Changes to DPS.pdf

Good afternoon Maura

Please see attached letter and Encls from Alistair Beggs, Director of Strategic Planning Directorate, Dfi for your attention.

Kind regards.

Fiona



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**DERRY CITY AND STRABANE COUNCIL'S PROPOSED CHANGES TO THE  
DRAFT PLAN STRATEGY**

**Comments provided by the Department for Infrastructure's**

**Water and Drainage Policy Division**

**January 2022**

The Department for Infrastructure's Water & Drainage Policy Division (WDPD) has reviewed Derry City and Strabane District Council's proposed changes to the Draft Plan Strategy and has a number of comments to make, which are set out below.

**Sustainable Drainage Systems (SuDS)**

Appendix 4 A4 (page 481) is factually incorrect.

<b>Ref</b>	<b>Current Text</b>	<b>Comments/ suggested amendment</b>
<b>Appendix 4 A4 PG481</b>	Currently there is an automatic right for developers to connect surface water run-off to a surface or combined public sewer.	In 2016 DfI changed the legislation regarding connection to the public sewer network, to provide a new power for NI Water to refuse a surface water connection if alternative means of dealing with surface water have not been considered. These alternative measures can also be landscaping or natural features.

<b>Ref</b>	<b>Current Text</b>	<b>Comments/ suggested amendment</b>
<b>Appendix 4 A4 PG482</b>	The current uptake of sustainable drainage solutions for new development within Northern Ireland is estimated to be below 5%.	2018/19 figures suggest that approximately 50% of developments requiring Article 161 agreements had SuDS included. These were mainly hard SuDS - attenuation tanks and larger pipes.

The Department would encourage the Council to provide clarification of what this estimate, below 5%, refers specifically to. Is it landscaped SuDS only? If it includes large attenuation tanks and pipes the figure may need revised.

### **Living with Water Programme (latest position set out below)**

On 9 November 2021, the Minister for Infrastructure launched the Living With Water in Belfast Plan, which seeks to revolutionise drainage and wastewater management with greener integrated solutions implemented alongside hard engineering infrastructure such as bigger pipes and flood defences. Work is now underway within the Department for Infrastructure to develop a Living With Water Plan for Derry, similar to the Belfast plan. This plan will examine the flooding and wastewater management issues across the city and will involve developing localised and integrated drainage solutions whilst promoting blue and green infrastructure, where possible.

The NI Flood Risk Assessment 2018 identified Derry as one of 12 Areas of Potential Significant Flood Risk (APSFR). The Council should give consideration to using blue and green infrastructure as well as traditional engineering methods, to manage water and drainage throughout the catchment in an effort to reduce the risk of flooding, particularly from surface water.