

From: Blockwell, Steve <Steve.Blockwell@niwater.com>
Sent: 27 January 2020 11:42
To: Local Development Plan
Cc: McCartney, Marie
Subject: NI Water's response to the Derry City and Strabane District Council LDP Draft Plan Strategy
Attachments: DCSDC Draft Plan Response 20200127.pdf

Dear Sir / Madam,

Thank you for providing NI Water with the opportunity to review and comment on the content of the Derry City & Strabane District Council LDP 2032 Draft Plan Strategy.

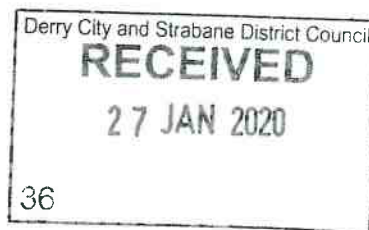
Based on NI Water's assessment against the tests for soundness we have concluded that in general this Draft Plan Strategy is sound.

However, NI Water has proposed some minor changes, these changes can be incorporated in accordance with normal consultation processes and are identified in the attached NI Water response document.

Kind regards,

Dr Stephen Blockwell
Head of Investment Management

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Planning Local Development Plan Team,
Derry City & Strabane District Council,
98 Strand Road,
Derry
BT48 7NN

Date: 27th January 2020

email ldp@derrystrabane.com

Dear Sir / Madam,

Derry City & Strabane District Council Local Development Plan 2032 -- Draft Plan Strategy

Comments provided by the Northern Ireland Water

Thank you for the opportunity to review the content of the Derry City & Strabane Draft Plan Strategy.

NI Water has reviewed the contents of the Derry City & Strabane District 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 is proposing some minor changes which can be incorporated in accordance with normal consultation processes and none of these changes would indicate that the Draft Plan Strategy is unsound.

The Council has taken into account all relevant Regional and Local Policies including Draft NI Programme for Government, Regional Development Strategy (RDS) 2025, Sustainable Development Strategy, Regional Transport Strategy, and Sustainable Water – A Long Term Strategy for Northern Ireland 2040.



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. Within Part D Social Development Section 9.1-9.19, NI Water welcomes the objective to facilitate the sustainable delivery of public utilities infrastructure (including water, wastewater, energy and telecommunications).

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. NI Water supports this approach and in particular welcomes Policy GDPOL1 7.106-110 Sustainable Drainage (SuDS) which confirms the LDP will influence developers to use SuDS as the preferred drainage solution. This policy, justification and amplification paragraphs also identify the challenge to deliverability associated with long term management of 'soft' SuDS but supplements this with the future objective to fully integrate SuDS within Development Management (Appendix 4 Annex A refers). NI Water welcome this direction in both respects.

NI Water also welcomes Policy FLDS Development in Proximity to Controlled Reservoirs.

Policy GDPOL1(ix) and Section 7.117-123 Development Relying on Non-Mains Wastewater Infrastructure is noted and welcomed.

Policy WPS Development in the Vicinity of Waste Management Facility is noted and welcomed. It recognises the potential loss of amenity arising from odour and the full range of relevant factors for consideration. However, NI Water would like to propose an amendment to the Justification and Amplification text. This will be discussed in this document under Suggested revisions.



Suggested revisions

**Policy WP5 Development in the vicinity of a Waste Management Facility, Page 321,
Justification and Amplification**

NI Water would propose that within paragraph 20.31 the reference to “prevailing wind direction” be removed as odour assessment should routinely encompass worst case scenarios of all wind directions over an extended timeframe. NI Water would also request reference be added to this paragraph that proposals adhere to NI Water’s Development Encroachment procedures.

Please contact either myself or Marie McCartney (Senior Planner; marie.mccartney@niwater.com) should you wish to discuss NI Water’s response to the Derry City & Strabane LDP Draft Plan Strategy.

Yours sincerely,

[Redacted Signature]

Dr Stephen Blockwell

**Head of Investment Management
Asset Delivery Directorate**

[Redacted Address]

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