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To: [Local Development Plan](#)
Subject: Consultation on Assessment Documents in advance of Adoption of the
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Attachments: [image001.png](#)
[Consult Letter 2 re Adoption Docs 10th April 2025.pdf](#)

Good Afternoon,

Thank you for your notification regarding the extension of the consultation period on the Derry City & Strabane District Council Local Development Plan (LDP) Assessment Documents. We appreciate the opportunity to contribute to this important process. See below comments from Northern Ireland Water below on the following:

- **Draft Habitats Regulations Assessment (HRA)**
- **Sustainability Appraisal Report (SA), incorporating a Strategic Environmental Assessment (SEA)**
- **Rural Needs Impact Assessment (Further Addendum)**

Comments on the Draft Habitats Regulations Assessment Report Local Development Plan 2032 - Draft Plan Strategy

1. Water Supply

The document refers to the NI Water 's Water Resource and Supply Resilience Plan WR & SR Plan published in 2020, the latest version of NI Water WR & SR Plan was published on the 8th of April 2025 and is available on the NI Water website. This Plan shows how the company will manage and develop water resources to make sure there is enough water to meet future supply needs. The WR&SR Plan acknowledges the need to take account of adopted and emerging Local Development Plans to ensure it complies with the Council's aims, objectives and long-term vision in terms of growth, constraints, and opportunities. NI Water recommends that the Sustainability Appraisal Report acknowledges the importance of continuous review and risk-based planning, particularly in the context of climate variability, population growth, and potential drought conditions.

2. Wastewater Treatment Works (WwTW):

HRA Context: Page 12 -13 The HRA notes insufficient capacity in several WwTW serving specific settlements within the Council area.

NI Water would draw attention to the current funding constraints which have impacted the capital investment programme during the PC21 period. Under the current funding scenario NI Water has had to prioritise investment on safe drinking water and base maintenance of our existing assets, this has resulted in the deferral of many capital upgrades to a future Price Control period.

NI Water note that the Living with Water Programme (LWWP) is not explicitly mentioned anywhere in the Draft Final Habitats Regulations Assessment (HRA) document for the Derry City & Strabane Local Development Plan 2032, which when progressed with assist with addressing historical capacity constraints.

Page 12–13 (Section 3 – Wastewater Treatment):

Refers to NI Water's identification of capacity constraints in 2025 (a snapshot), listing settlements at or near capacity. It's essential to regularly check the capacity of Wastewater Treatment Works (WwTW) and the sewerage networks, especially in areas experiencing significant growth. NI Water keeps this

information up to date, but the HRA currently relies on data from February [2025.NI](#) Water will issue an updated sheet on a yearly basis to reflect any changes to WwTW capacities within the Council area. NI Water is committed to working closely with the Council's Local Development Planning team to discuss wastewater capacity issues, investment and provide any additional information required.

Comments on SA Addendum No. 2 (March 2025)

1. Wastewater Treatment and Capacity Constraints (Page 8–9)

NI Water welcomes the inclusion of capacity constraints in the SA but recommends the appraisal acknowledge the ongoing need for investments that are not yet funded or scheduled. The SA should stress the importance of phased development to align with confirmed capacity, and support a plan-led approach to prioritise critical infrastructure upgrades under the LDP.

2. Sustainable Drainage and Blue-Green Infrastructure (Page 10–11)

NI Water recommends the SA more explicitly support the implementation of Sustainable Drainage Systems (SuDS) and blue-green infrastructure as essential tools for managing surface water sustainably. These solutions are core to help reduce pressure on combined sewerage networks while also offering biodiversity, amenity, and climate resilience benefits. The SA could be enhanced by recommending stronger policy backing for SuDS in high-growth and flood-sensitive areas.

Comments on Assessment of the RNIA Second Addendum (March 2025)

1. Consideration of Infrastructure Delivery Rural Settlements

RNIA Reference: Table 1 & Section 4.4 (Page 7)

The RNIA concludes that modifications to the LDP Plan Strategy do not materially impact rural needs. However, from a utility perspective, the report does not acknowledge ongoing wastewater treatment and sewerage capacity challenges in certain rural areas. NI Water has identified areas with known constraints, which should be considered when assessing if rural development remains sustainable.

2. Acknowledgement of Rural Environmental Constraints

RNIA Reference: Section 2.4 (Page 5)

The RNIA identifies rural isolation and low population density as social issues, but omits environmental and infrastructure-specific constraints such as the sensitivity of receiving waters or limitations of small scale wastewater treatment works. These environmental factors often govern the feasibility of rural development from wastewater treatment perspective. However, it is recommended the RNIA incorporate environmental infrastructure as a distinct rural constraint influencing both location and scale of rural development.

3. Integration of Sustainable Drainage Considerations

RNIA Reference: Not addressed

There is no reference to sustainable drainage systems (SuDS) in the RNIA, despite their increasing relevance in managing surface water runoff in rural settlements, particularly where combined sewer networks exist. As these areas lack the infrastructure resilience found in urban centres, promoting SuDS within policy

implementation would enhance both rural sustainability and compliance with water utility standards.

4. Treatment of Policy Modifications Related to Rural Development

RNIA Reference: MOD 27 / Policy ED 5 (Pages 6–7)

The RNIA notes that MOD 27 could positively impact rural communities by clarifying support for small scale economic development in the countryside. However, the utility implications of this expansion such as demand on small wastewater treatment works and limited wastewater networks are not discussed. To ensure that infrastructure capacity matches proposed land uses, the RNIA should recommend coordination with NI Water in areas where existing rural services are already close to or beyond operating limits.

5. Forward Planning and Ongoing Capacity Review

RNIA Reference: Section 4.6 (Page 7)

The RNIA briefly notes a five-year LDP review cycle but does not recommend any utility-specific review mechanisms. Given the changing demand profile and climate impacts, especially in rural areas, a more structured recommendation for ongoing infrastructure capacity reviews involving statutory consultees such as NI Water would strengthen the RNIA's alignment with deliverability and long-term resilience objectives.

Regards

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