

NILGA Response to the DfI Living with Water in Belfast Consultation

The following response was agreed by the NILGA Executive Committee at their meeting of 15th January 2021, and was forwarded to councils for information and/or use. This response is being submitted to the Department to meet the deadline of 29th January 2021. Queries should be forwarded to k.smyth@nilga.org

Derek McCallan
Chief Executive

Date 29th January 2021

1.0 INTRODUCTION

NILGA, the Northern Ireland Local Government Association, is the representative body for district councils in Northern Ireland. NILGA represents and promotes the interests of the 11 Northern Ireland district councils and is supported by all main political parties. The Association welcomes the opportunity to comment on 'Living with Water in Belfast' in the understanding that the intention is to roll out a similar approach across other water catchment areas. We trust that the views outlined below will be taken into account when the document is being finalised, and during its implementation.

2.0 GENERAL COMMENTS

NILGA broadly welcomes the approach outlined in 'Living with Water in Belfast' which appropriately communicates the significant challenges NI Water and its partners are facing, the need for provision of holistic and integrated drainage and wastewater solutions achieving multiple benefits, and the scale of investment required.

NILGA and our member councils look forward to working with Department for Infrastructure, NI Water and other partners as these challenges are met, and to assisting in developing the necessary solutions. We congratulate DfI and NI Water in radically rethinking the approach to drainage and wastewater management, providing this strategic drainage infrastructure plan for Greater Belfast. Since each council area has serious specific and major water infrastructure issues, the collective impact across NI requires transformative thinking and investment, and we look forward to the production and implementation of similar strategic plans for other areas.

3. CONSULTATION QUESTIONS

NB: The following questions are answered focussing on issues that are relevant regionally, i.e. not including issues pertaining to individual study areas. NILGA will therefore not be providing answers to Questions 5, 6 and 7.

1. Do you agree that Belfast is facing significant drainage and wastewater management issues?

Yes. It has been clear for some time now that Belfast, like over 100 other settlements across Northern Ireland, is facing significant drainage and wastewater management issues. With Greater Belfast being the largest population and economic centre in Northern Ireland, it is vital that the challenges of flooding, barriers to development and the resulting impact on the community and economy are effectively addressed through long term solutions. Much of the drainage and wastewater infrastructure in Belfast is in need of an urgent upgrade.

2. Do you agree that we need to change the way we manage water flowing through our urban areas?

Yes. NILGA notes that the need to do things differently was recognised in the Long Term Water Strategy, and in particular it is necessary to overcome the fragmentation involved in construction and operation of our infrastructure. NILGA welcomes the inclusion of the wide range of partners in the design and implementation of 'Living with Water', and the intent that key partners work together to provide a sustainable and integrated approach to drainage, using a catchment-based approach in line with contemporary best practice.

It is particularly encouraging to see the public sector bodies work together to overcome silo approaches to investment and to begin to address responsibilities through co-production, in an integrated and collaborative way.

3. Do you agree that during periods of heavy rain, green spaces in urban areas should be used to hold water on a temporary basis to help prevent the flooding of homes and businesses and help prevent sewage spilling in to the City's rivers and Belfast Lough?

Yes. However, solutions have not yet been found to the key issues of public sector fragmentation, of land ownership, long term maintenance and liability. NILGA particularly notes the large amount of green space owned by for example, the NI Housing Executive and schools, which are not mentioned in the document as partners (and in other jurisdictions would be largely council-owned).

Blue/Green infrastructure has been recognised by local government as of critical importance, and indeed a great deal of work, involving councils, has been carried out recently to develop greenways etc. More thought is required as to how to begin to incorporate private gardens and lands into our drainage infrastructure, and encourage residents to maintain their gardens as green space rather than paving them (such as in conversion to parking space).

Our members are keen to see the Department explore (in collaboration with councils), the potential for use of developer contributions to ensure that appropriate levels of green space and soft SuDS are designed into new developments.

NILGA also notes with interest, the inclusion in the UK Environment Bill of new requirements in relation to biodiversity, conservation and planning. Although these sections of the Bill are specific to England, and we have a different legislative framework for planning, the approaches being introduced (e.g. conservation covenants) might be worth considering in Northern Ireland to enable us to better address some of the ongoing issues around mainstreaming soft SuDS and increasing the amount of green space in urban areas.

4. Do you agree with the catchment based approach to address drainage and wastewater management problems?

Yes. The abovementioned issues with ‘soft’ sustainable urban drainage systems notwithstanding, a more strategic approach to natural management of rainwater management is welcomed, and use of a catchment based system enables collaborative partnership working to explore opportunities and address potential problems in a bespoke manner, tailored to each catchment. More effective rainwater management will reduce the impact on wastewater infrastructure in general, reducing peak pressures thereby reducing the likelihood of release of untreated sewage into Belfast lough. NILGA would be keen to see progression of a programme of capital works to take forward the necessary catchment based solutions and upgrades to wastewater treatment works, supported by the necessary policy measures.

8. Do you agree that the levels of investment identified within this plan are necessary and should be considered a high priority by the NI Executive?

Yes. Investment in our drainage and waste water infrastructure must be a key priority for the NI Executive. This is a position NILGA has taken in partnership with NI water and which we have strongly articulated in response to the Long Term Water Strategy, the NI Water Strategic Plan and Annual Report. Without strategic and planned investment in this vital infrastructure, our local development, investment, economic development and community plans will be unable to flourish, or even be implemented effectively.

We understand that in the current financial climate, and particularly post-COVID, how challenging this amount of investment is likely to be, but it is imperative that strategic, phased and appropriately planned investment is made to make the necessary upgrades, and maximise the realisation of the benefits of this changed approach.

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