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Mid and East Antrim Borough Council,
Local Development Plan Team,
County Hall
182 Galgorm Road
Ballymena
BT42 1QF

Date: 4th December, 2019

Dear Sir / Madam,

Comments on the Mid and East Antrim Borough Council LDP Draft Plan Strategy

GENERAL COMMENTS

NI Water has reviewed the contents of the Mid and East Antrim 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. Some general comments are detailed using bullet points below:

- 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, Sustainable Water – A Long Term Strategy for Northern Ireland 2015-2040 etc.
- Predicted population growth is in accordance with the 2016-based NISRA Population Projections and confirms an increase of 2.2% by 2030 resulting in an estimated total of 142,114.

- 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 Section 4.2 - Strategic Objectives, NI Water welcomes Economic Objective (f) To facilitate the provision of upgrading of public utilities infrastructure (including water, wastewater, energy and telecommunications) to meet economic and community needs.
- Housing needs are well documented in Technical Supplement 3. In particular, it is good to see some granularity when it comes to housing allocation throughout the various main towns, small towns, villages and small settlements. It is noted and welcomed that approximately 89% of housing growth is to be allocated to main towns, small towns and villages.
- 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 FR04 Sustainable Drainage (SuDS) which confirms the LDP will influence developers to use SuDS as the preferred drainage solution, particularly in areas susceptible to surface water flooding and also for relatively large developments where the benefits are likely to be greater and SuDS easier to facilitate. This policy justification and amplification paragraphs also identifies the difference in 'soft' and 'hard' SuDS, gives examples of each, and significantly, confirms in paragraph 9.2.42 that 'An appropriate maintenance and management plan for SuDS will be required to be submitted with the planning application. It also states 'This maintenance and management plan will be required to be agreed with the Council and may involve a S76 planning agreement where necessary to ensure ongoing maintenance'.



- NI Water also welcomes Policy FRD6 Development in Proximity to Controlled Reservoirs and note that the 22 confirmed controlled reservoirs are listed in Appendix I Part C. However, NI Water would like to propose a minor amendment to this list. This will be discussed later in this document under Proposed Amendments.
- Section 9.5 Water and Wastewater (Sewerage) Infrastructure, Policy WWI1 Development Relying on Non-Mains Wastewater Infrastructure is noted and welcomed.
- Section 9.6 Waste Management, Policy WMT4 Development in the vicinity of a 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 later in this document under Proposed Amendments.

PROPOSED AMENDMENTS

Appendix I Flood Risk: Page 347, Part C – Controlled Reservoirs within Mid and East Antrim Council Area (as of June 2019).

This table includes Sullatober Reservoir. This reservoir has been abandoned and will not be brought back into service. It can therefore be removed from this table.

Policy WMT4 Development in the vicinity of a Waste Management Facility, Page 258, Justification and Amplification, paragraph 9.6.30

This paragraph refers to development proposed in the vicinity of WWTWs. NI Water would propose that within this paragraph a reference is made to NI Water Development Encroachment – Odour Assessment Policy and Procedure.



Please contact either myself or [REDACTED] (Senior Planner; [REDACTED] should you wish to discuss NI Water's response to the Mid and East Antrim Borough Council Draft Plan Strategy.

Yours sincerely,

[REDACTED]

[REDACTED]

Head of Investment Management
Asset Delivery Directorate

[REDACTED]

