



LIVING WITH WATER IN BELFAST

**An integrated plan for drainage and
wastewater management in greater Belfast**

PUBLIC CONSULTATION REPORT

June 2021



Department for
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An Roinn

Bonneagair

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LIVING WITH WATER IN BELFAST

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Wastewater Management in Greater Belfast



CONSULTATION DOCUMENT

Living 
With Water
Programme

1. INTRODUCTION

- 1.1. On Wednesday 11 November 2020, the Department for Infrastructure (the Department) launched an eleven week consultation on proposals to deliver **Living With Water in Belfast: An Integrated Plan for Drainage and Wastewater Management in the Greater Belfast Area – hereafter called the Plan**. The consultation was sent to a total of 331 consultees, including Section 75 groups, MPs, MLAs, government departments and other public consultees. The consultation officially closed on 29 January 2021.
- 1.2. A Press Release issued on 11 November 2020 to mark the start of the consultation period and correspondence was issued to a wide range of stakeholders. Information was also made available on the Department’s website, and social media updates were issued via Twitter, throughout the consultation period. Consultees were invited to respond to the consultation by email to LivingWithWater@infrastructure-ni.gov.uk or to submit responses by post. The consultation and related Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) remain available on the Department’s website at: <https://www.infrastructure-ni.gov.uk/consultations/living-water-belfast-consultation>
- 1.3. LWWP officials met with a number of stakeholders, in the lead up to, and during the consultation period to provide further clarification of the proposals contained in the draft Plan. These included: the Northern Ireland Housing Executive, the National Trust, Northern Ireland Environment Link, the Chartered Institution of Water and Environmental Management, the Committee for Infrastructure and all of the local councils impacted by the plan. A list of all stakeholder meetings and presentations is included at **Appendix A**.
- 1.4. The Department wishes to thank the members of the various working groups that contributed to the development of the Plan and all stakeholders and members of the public who took the time to respond to the consultation.

Consultation Responses

- 1.5 A total of thirty one responses were received and electronic copies of these are held by the Living With Water Programme team. Twenty seven of these came from representative bodies, political parties, elected representatives, local government, industry and four from private individuals. A number of organisations requested additional time to respond and these were accepted during February and March 2021 and are included in this report. **Appendix B** provides a full list of the organisations and individuals who responded to the consultation.

Presentation of consultation findings

- 1.6 This paper provides a summary of the consultation responses. It should be noted that it is not intended to be a comprehensive report of every view expressed but rather a broad synopsis of the key issues raised by respondents. **Appendix C** provides a detailed summary of all the comments received and the Department's response.
- 1.7 The consultation asked 8 specific questions. **Section 2** of the report provides a statistical overview and summary of the responses received to each question. Not all respondents answered the 8 questions with some preferring to make general comments.
- 1.8 **Section 3** of the report summarises the key themes to emerge from the consultation.
- 1.9 **Section 4** sets the out the next steps for implementation of the Plan.

2. STATISTICAL OVERVIEW OF RESPONSES TO CONSULTATION QUESTIONS

Consultation Question 1

Do you agree that Belfast is facing significant drainage and wastewater management issues? Yes or No

All 23 respondents answered yes.

- 2.1 There was unanimous agreement that Belfast is facing significant drainage and wastewater management issues from the 23 respondents who answered this question directly.
- 2.2 Belfast City Council acknowledged the significant drainage and wastewater management issues facing the city and highlighted the need to develop long term sustainable solutions to address the challenges of flooding, development constraints and the impact on the community and economy.
- 2.3 There was wide acknowledgement of the lack of capacity in the wastewater network and an understanding of the impact this has on investment in construction. Belfast City Council pointed out that appropriate infrastructure is a fundamental enabler of the construction industry and will be vital to help create the conditions for achieving the growth aspirations set out in the Belfast Agenda.
- 2.4 Respondents recognised that long term solutions are needed, that the infrastructure needs updated and that investment is necessary. They understood the need for a holistic catchment based approach, including upper catchment management, as well as the need to work in partnership to drive cost efficiencies and deliver sustainable, innovative solutions.

- 2.5 Mid and East Antrim Borough Council called for full consideration to be given to the wider areas covered by the Plan, including North Foreshore, and sought assurance that adequate resourcing would be allocated in proportion to these areas.
- 2.6 Concerns were also raised about exposure to flooding, the impact on water quality, the loss of natural habitat and the need to see ecology protected. Respondents also drew attention to the impact of climate change and the need for environmental resilience.

LWWP Response

Based on the responses received, the unanimous consensus is that Belfast is facing significant drainage and wastewater management issues and there is clear support for the aims of the LWWP. The Department acknowledges that there are significant issues to be addressed across the whole Plan area.

Consultation Question 2

Do you agree that we need to change the way we manage water flowing through our urban areas? Yes or No

All 24 respondents answered yes.

- 2.7 Once again, there was unanimous support from the respondents on the need to change the way we manage water flowing through our urban areas.
- 2.8 Respondents agreed that there was a need to manage water flowing from the upper catchment, through the urban area to the sea. They recognised that whilst hard engineered measures would continue to be necessary, blue/green infrastructure was also important and could make a valuable contribution to flood management, whilst bringing a range of other socio-economic benefits to local communities.
- 2.9 Many felt that a new sustainable approach was essential to address the challenges posed by climate change, with more severe weather events increasing the likelihood of flooding from rivers, sewers and the sea. There was overall support for the use of Natural Flood Management (NFM) and Sustainable Drainage Systems (SuDS) as tools to manage surface water run-off at source, whilst improving the natural environment and restoring natural habitats.
- 2.10 Belfast City Council welcomed the use of NFM which would “enable the restoration and creation of riverine and coastal habitats which are key priorities to address biodiversity loss.”
- 2.11 Collaborative working to develop a new, integrated, strategic and long term approach to drainage and wastewater management was welcomed and viewed as key to the success of Living With Water. The West Belfast Partnership Board stated that the Plan ‘provides an opportunity for key partners to work together to co-design solutions,

including Belfast City Council, statutory partners such as Northern Ireland Housing Executive, health and education estates, sports bodies and the Belfast Hills.’

2.12 However, the Department notes that some respondents highlighted the need for education about flood risk and the benefits of using blue/green infrastructure to address it. They felt it would be important for the public to understand that the attenuation of water in public places and the occasional flooding of designated areas can be a positive approach to flood management. A greater understanding of the issues and measures could change attitudes and influence future behaviour.

LWWP Response

The respondents agree that we need to change the way we manage water flowing through our urban areas. The LWWP Team welcomes this and agrees that it will be important to work closely with partners and local communities in the implementation of the Plan.

Consultation Question 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 into the City's rivers and Belfast Lough? Yes or No

All 22 respondents answered yes.

- 2.13 Respondents were very supportive of the proposal to use green spaces to hold water on a temporary basis to prevent flooding and sewage spills. A number of respondents stated that there was an urgent need for an integrated SuDS policy, to align with the development of any infrastructure project. Some suggested that planning policy should include a mandatory requirement for all new developments to have their own SuDS. Others suggested that incentives should be made available for farmers, businesses and land owners to provide as much green space as possible for drainage purposes.
- 2.14 Belfast City Council referred to both its Belfast Open Spaces Strategy and Blue Green Infrastructure Plan, which both complement this Plan, and pointed out that the city's open spaces can play an important role in increasing its resilience to climate change. The Council stressed that it is keen to continue working in partnership with others to shape and develop plans and to identify other projects in the city which could present opportunities for joint working.
- 2.15 There was general agreement that partnership working and stakeholder engagement would be necessary to ensure that there was a good understanding of the need for SuDS schemes and the range of benefits they can deliver. Early community engagement would provide a good opportunity to educate local residents about SuDS, to discuss risks, to take on board their views and ensure buy-in.

LWWP Response

There was significant support from respondents for the use of green spaces to hold water in urban areas. The LWWP Team acknowledges this and intends to include this as a fundamental part of the Plan.

Consultation Question 4

Do you agree with the catchment based approach to address drainage and wastewater management problems? Yes or No

All 20 respondents answered yes.

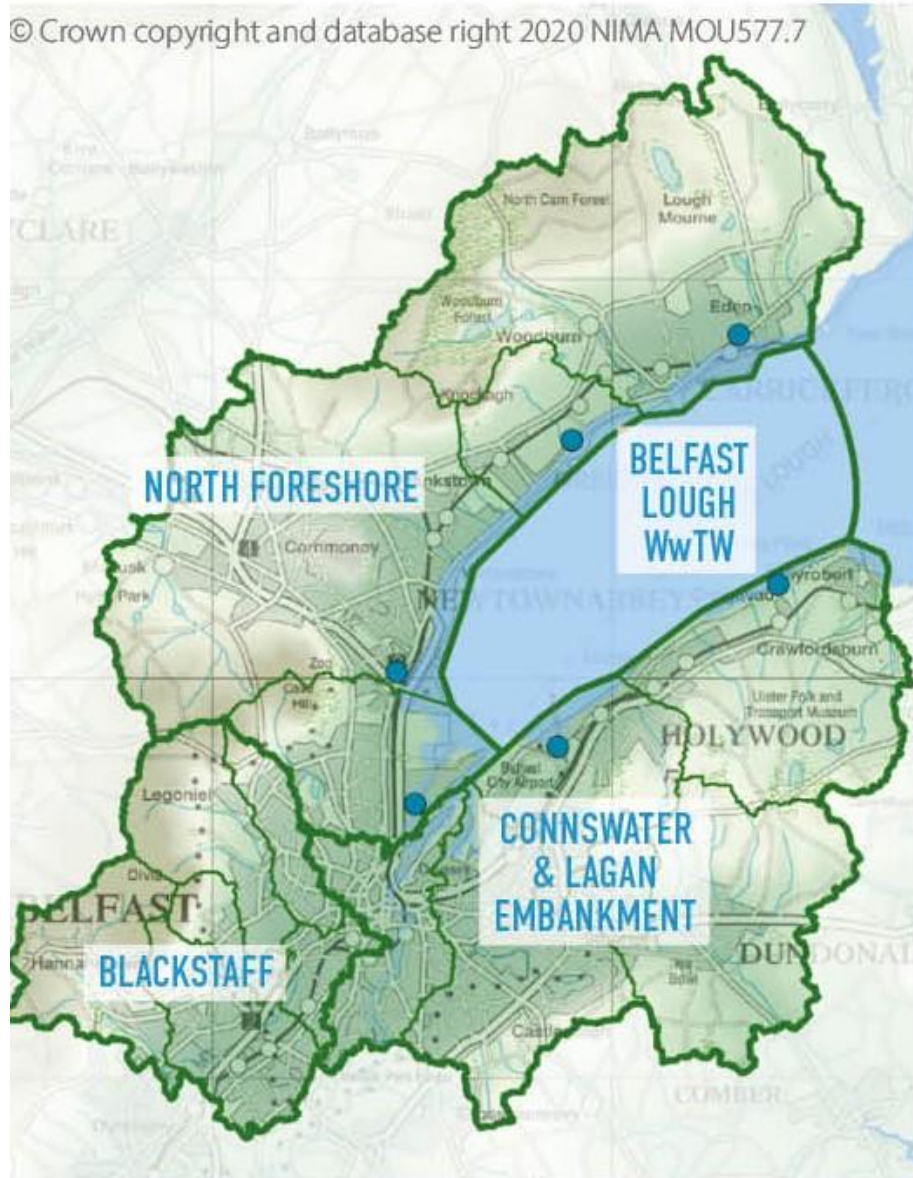
- 2.16 There was full support for the catchment based approach to addressing drainage and wastewater management problems.
- 2.17 The catchment based approach is widely understood to provide an opportunity for stakeholders to work closely together to identify issues, to explore opportunities, share knowledge and develop solutions tailored to specific areas. However, whilst it is viewed as the best way forward, some respondents, including the Woodland Trust, stressed that early engagement with a wide range of landowners would be critical to the success of the approach.
- 2.18 Again, the need for further information and policy guidance on the ownership and maintenance of blue/green measures, including SuDS, was identified as a priority area. Whilst the hard engineered measures follow tried and tested procedures, the area of blue/green infrastructure is very new and respondents stated that detailed guidance would be required.

LWWP Response

The LWWP Team acknowledges that there is wide support for the catchment based approach and that it provides a holistic method of addressing drainage and wastewater management problems. The LWWP Team recognises the need to develop clear policy guidelines and the importance of early community engagement for successful delivery of the Plan.

Study Areas

2.19 The geographical area covered by the Plan was divided into four distinct Study Areas based on the natural drainage of the area and the sewerage network, as shown in the map below.



2.20 Questions 5 to 7 were asked for each specific Study Area in the Plan. The detailed responses to these questions tended to be from groups and individuals with a specific interest in the area concerned.

2.21 Whilst a number of these respondents indicated agreement to the pressures, issues and measures identified, a number did also offer further areas for consideration.

Consultation Q5

Do you agree that we have identified all the pressures and issues and set the correct objectives? Yes or No

2.22 This question was asked for each Study Area and the responses received are summarised below.

Study Area	Yes	No
Blackstaff	4	2
Connswater & Lagan Embankment	2	2
North Foreshore	5	0
Inner Belfast Lough (WwTW)	3	1

2.23 Many respondents felt they were unable to comment on specific pressures and issues as they had limited or no knowledge of the area in question. For presentation purposes, an overview of the main comments received are set out below for each separate Study Area.

Blackstaff Study Area

2.24 Kier Integrated Services commented that the current consultation document and plan looks to be very comprehensive, adding that the issues identified within the catchment demonstrate that the approach is both valid and likely to have identified all the key challenges.

2.25 The Institution of Civil Engineers NI highlighted the need for ongoing maintenance and desilting of the Blackstaff culvert through Belfast City Centre. They welcomed the proposal to examine opportunities for integrated catchment based solutions including

consideration of planned and existing capital projects i.e. Belfast City Council's Peace IV Programme.

2.26 The National Trust **disagreed** that the Plan identified all the pressures and issues and set the correct objectives for this study area. They pointed out that the Divis and Black Mountains could play a significant role in the water system and highlighted a number of additional pressures and issues across the catchment, including the challenges posed by the patchwork of land ownership and historic land management practices impacting the of the hills to hold back water. They also highlighted that the loss of trees in the lower Colin Glen posed a risk to the Plan's natural flood prevention aims. Given the Trust's ownership of Divis they were keen to understand in particular where the water quality issues in the Colin Glen catchment lie. The National Trust would also like to see a sustainable attenuation plan put in place that also takes into account the need for greener access to the Belfast Hills.

Connswater / Lagan Embankment Study Area

2.27 Kier Integrated Services commented again that the current consultation document and plan looked to be very comprehensive whilst the Institution of Civil Engineers NI welcomed the proposal to work with partners in relation to integrated drainage and attenuation schemes, on existing and planned capital projects, such as the York Street interchange.

2.28 The National Trust agreed with the objectives identified for the study area and welcomed the aims of achieving 'Good Ecological Potential in the Connswater River and the Lagan Estuary and downstream to Belfast Harbour, and Good Ecological Status in Belfast Lough.' However, the Department notes that the National Trust has requested further detail about the location of water quality issues in the Connswater catchment, given that it owns land in the Cregagh Glen and Lisnabreeny areas.

2.29 The National Trust also pointed out that, 'as with the Belfast Hills, the land in the Castlereagh and Craigantlet Hills is owned by various private landowners, making the

implementation of sustainable interventions throughout the sub-catchment particularly challenging.’

North Foreshore Study Area

2.30 Antrim & Newtownabbey and Mid & East Antrim Borough Councils both agreed that the Department had correctly identified the pressures and issues set out in this area. Antrim and Newtownabbey Borough Council particularly welcomed the inclusion of works at Whitehouse / Mallusk and looked forward to further engagement on this.

2.31 Mid & East Antrim Borough Council raised the issue of capacity at Carrickfergus and Greenisland and suggested that a more detailed timeframe of when capacity might become available in each of the areas would be helpful. The Council also sought further clarification of the term ‘facilitate sustainable development in the sub-catchment’ in the context of drainage capacity and pressures to accommodate new housing and other developments.

2.32 Kier Integrated Services commented that ‘the proposals for the Cavehill and Carnmoney Hill zones offered real potential to manage some of the drainage issues in an imaginative way which would not only manage the flows, but also open up significant biodiversity options.’ They added that ‘the water quality issues at Whitehouse and its environs are well documented and the report clearly identifies the issues and the proposed solutions.’

2.33 The Department notes comments from the Institution of Civil Engineers NI that ‘this area contains four of the six WWTW that treat wastewater before it enters Belfast Lough’ and ‘solutions that involve extensive pumping to treat or transfer flows should be avoided as far as possible to reduce energy consumption and to assist with achieving the Net Zero Carbon target’.

2.34 The Royal Society for the Protection of Birds also highlighted an opportunity to include additional green infrastructure, sustainable drainage and management of the former landfill site at the North Foreshore.

Inner Belfast Lough Study Area (WwTW)

- 2.35 Mid & East Antrim Borough Council, whilst answering yes to the question, stated it would be difficult to find a balance between the objective to facilitate sustainable development whilst increasing capacity within the WwTW and networks to support new connections; and the additional new housing and other developments that would be constructed throughout the Plan period. The Council again stated that it would be beneficial if more detail was provided and a more detailed timeframe identifying when capacity would become available.
- 2.36 Kier Integrated Services and a number of other respondents drew attention to the significant challenges presented with capacity and compliance of the WwTWs discharging into Belfast Lough and the associated environmental impacts on shellfish waters.
- 2.37 The Agriculture Minister commented that if it became appropriate to designate Belfast Lough as a Sensitive Area under the Urban Waste Water Treatment (NI) Regulations to protect the Shellfish Waters, then the level of wastewater investment outlined in the Plan would likely become a regulatory requirement.

LWWP Response

The majority of substantive responses agreed that all the pressures and issues had been identified and that the correct objectives for each study area had been set.

The LWWP team welcomes additional information in relation to new pressures and issues received during this consultation process and will consider these when finalising the Plan.

Consultation Q6

Do you agree that we have identified all the opportunities for integrated drainage measures?

Yes or No

2.38 This question was asked for each Study Area and the responses received are summarised below.

Study Area	Yes	No
Blackstaff	4	2
Connswater and Lagan Embankment	3	2
North Foreshore	6	1
Inner Belfast Lough (WwTW)	4	1

2.39 Many respondents felt they were unable to comment on the opportunities for integrated drainage measures for each Study Area as they had limited or no knowledge of the area in question. Belfast City Council notes that many of the proposed solutions use Council assets and as many of these are conceptual at this stage, would welcome the opportunity to become involved in the development of these at the outset. For presentation purposes, an overview of the main comments received are set out below for each separate Study Area.

Blackstaff Study Area

2.40 The RSPB would be keen to engage with the Department to explore what support and partnership opportunities may exist, whilst Belfast Hills Partnership would be willing to facilitate meetings, workshops and site visits and exchange best practice and expertise with those organisations and groups that have a vital role to play in delivering NFM.

2.41 The National Trust, whilst responding 'no' to this question, stated that they could play a vital role in implementing integrated drainage measures and water management

improvements and would welcome the opportunity to work in partnership with the LWWP to further explore these catchment based solutions.

2.42 Belfast City Council would welcome the inclusion of a potential SuDS scheme at Distillery Street where it is already working with a group of stakeholders to develop proposals for a piece of underused land.

Connswater / Lagan Embankment Study Area

2.43 Both Belfast City Council and the Royal Society for the Protection of Birds made comments on the Belvoir/Newtownbreda area which is outside the geographical scope of the Plan. The Royal North of Ireland Yacht Club drew attention to the extensive tracts of privately owned lands, notably the Castlereagh, Craigantlet and Holywood Hills and stated it would be important to engage constructively with landowners and UFU etc. for the adoption of appropriate agri-environmental schemes.

2.44 The National Trust, whilst responding 'no' to the question, stated that it could play a vital role through its ownership of Belvoir, Lisnabreeny and Cregagh Glen and welcomed the opportunity to work in partnership with the LWWP Team in the Lisnabreeny area. It also suggested that 'now is the time to consider the creation of a Castlereagh Hills Trust / Partnership to help join up the strategy for the hills in the same way the hills in the west are co-ordinated'.

North Foreshore Study Area

2.45 Both Antrim & Newtownabbey and Mid & East Antrim Borough Councils agreed that the Department had identified all the opportunities for integrated drainage measures and were keen to continue to engage with the Department to ensure that the range of opportunity based solutions were realised. The Woodland Trust also expressed a willingness to work with the Department to identify opportunities and future proposals for SuDs and NFM schemes. The Trust referred specifically to potential new NFM measures and woodland creation opportunities at Carmoney Wood and the Cavehill

and Carrickfergus areas. A number of respondents noted the absence of the Giants Park and suggested this should be considered as an opportunity.

Inner Belfast Lough Study Area (WwTW)

2.46 Kier Integrated Services stated that the overall Plan seemed to be comprehensive but said it would be a challenge to bring some of the opportunities to fruition given the number and mix of stakeholders involved. They added that in this particular Study Area, ‘sources of funding and opportunities from tourism and leisure may not yet be fully apparent.’

2.47 The Royal Society for the Protection of Birds said they were keen to be involved in work on the Harbour Meadows site near George Best City Airport and the mouth of the Lagan, as they could help connect a landscape across Belfast Harbour and given its proximity to Belfast City Centre, ‘provide a world-class, extraordinary resource to reconnect local people to nature.’

2.48 Mid & East Antrim Borough Council noted the opportunity to transfer some of the sewage load from Whitehouse WwTW to Greenisland WwTW in order to free up capacity. Due to the significant capacity problems that already exist at Carrickfergus, the Council’s opinion was ‘that any limited spare capacity that may exist at Greenisland should be used to relieve the pressure on the Carrickfergus system as a priority over any other areas in the study’.

LWWP Response

The majority of substantive responses agreed that all the opportunities for integrated drainage in the 4 study areas had been identified. The LWWP team is encouraged by the support expressed by respondents and their willingness to engage further on the proposals as the Plan is further developed and implemented.

Consultation Q7

Do you agree that the proposed measures adequately address the pressures and issues and meet the objectives? Yes or No

2.49 This question was asked for each Study Area and the responses received are summarised below.

Study Area	Yes	No
Blackstaff	4	1
Connswater and Lagan Embankment	3	1
North Foreshore	5	1
Inner Belfast Lough (WwTW)	4	1

2.50 As per Questions 5 and 6, many respondents felt they were unable to comment on the proposed measures as they had limited or no knowledge of the area in question. For presentation purposes, an overview of the main comments received are set out below for each separate Study Area.

Blackstaff Study Area

2.51 The National Trust suggested that if the additional opportunities it highlighted in its response were included, the proposed measures would adequately address the pressures and meet the objectives set out in the Plan for the Blackstaff study area.

Connswater / Lagan Embankment Study Area

2.52 The National Trust suggested that if the additional proposals it put forward were included, the measures would adequately address the pressures and meet the objectives set out in the Plan for the Connswater and Lagan Embankment Study Area. It would, however, also like to see the scope of the plan extended to include more of the River Lagan including the National Trust site at Minnowburn.

2.53 Royal North of Ireland Yacht Club encouraged the Department to prioritise, wherever possible, the blue/green aspects of the strategy which would have wider and positive environmental, societal and economic impacts.

North Foreshore Study Area

2.54 The Woodland Trust recognised the significant amount of planning, modelling and design work that the Plan would involve and said it would like to see natural capital accounting embedded within the Integrated Environmental Model to help to better understand the value of the ecosystem services and the potential impact any proposed measures would have on these.

2.55 Whilst agreeing that the proposed measures would adequately address the problems, Mid & East Antrim Borough Council stressed that blue/green infrastructure measures and a catchment based approach would only work if properly managed and regulated.

Inner Belfast Lough WwTW Study Area

2.56 The National Trust agreed that the development of resilient wastewater infrastructure would be critical to Belfast's economic, social and environmental goals.

2.57 Mid & East Antrim Borough Council supported the need to upgrade WwTW and sewerage systems particularly in the Carrickfergus area. It reiterated its opinion that any limited spare capacity identified by LWWP, which may exist at Greenisland, should be used to relieve the pressure on the Carrickfergus system, as a priority over any other areas. In addition, it welcomed the plans to upgrade sea outfalls at both Greenisland and Carrickfergus.

LWWP Response

The Department is encouraged by the support for the proposed measures and will carefully consider the comments received when finalising the Plan.

Consultation Question 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 or No

All 21 respondents answered yes.

- 2.58 All respondents **agreed** that the levels of investment identified within the plan are necessary and should be considered a high priority by the NI Executive.
- 2.59 There was widespread recognition of the need for the Executive to prioritise the funding of the Plan and that delays and continued underinvestment would only cause the problems and risks to grow. Belfast City Council stressed the need for a fully funded financial model approved by the Executive to ensure that the Plan could be implemented; NI Local Government Association commented that ‘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;’ and the Royal Society of Ulster Architects stated that ‘not to undertake the LWWP would be a profound failure of governance.’
- 2.60 Whilst respondents supported the levels of investment required to implement the Plan, there was an appreciation of the financial pressures facing the country at present with some, including Climate NI, calling for innovative funding and implementation opportunities to be explored. There were also calls for financial support and incentives to encourage landowners to undertake environmentally friendly land improvements.
- 2.61 Investment in the Plan was viewed as essential to future proof drainage against the effects of climate change through the development of catchment based sustainable schemes. The Institution of Civil Engineers NI commented that investment in the Plan ‘has the potential to deliver long-term savings and efficiencies as well as supporting net zero carbon aims’ and they suggested that the Plan ‘could be a leading light in the post–Covid green recovery of NI.’

2.62 The value of blue/green infrastructure was widely recognised and the £201m identified in the Plan for such measures was welcomed. However, questions were raised as to whether this figure was aspirational, whether a greater proportion of the budget should be for blue/green measures and whether the Department could provide a more detailed breakdown of how it would be spent.

2.63 Respondents felt that investment should be focused on those schemes which would address the most pressing problems and deliver results quickly. This would demonstrate the benefits of the Living With Water approach for everyone in the community and generate buy-in from the general public and developers.

LWWP Response

The Department welcomes the considerable support for a fully funded programme and notes that all respondents advocated funding prioritisation for the Plan.

3. SUMMARY OF MAIN THEMES FROM PUBLIC CONSULTATION

3.1 Many of the consultation responses received came in the form of general comments which were overwhelmingly positive and supported the objectives and approach taken by the Plan, both in terms of the partnership working proposed and the whole catchment methodology. Many of the respondents welcomed the proposed opportunities for integrated working within their areas of interest, and expressed a willingness to explore these further and to identify additional areas of opportunity for integrated water management. However, a number of common themes emerged which were echoed by several respondents, where clarity was sought from the LWWP team. These are summarised below:-

The need for strategic planning policy, particularly for SuDS in new developments

3.2 The Department received a large number of responses about SuDS including comments from Ards & North Down Borough Council, Climate NI, Consumer Council, Department of Finance, the Institution of Civil Engineers NI, Mid & East Antrim Council, National Trust, Northern Ireland Environment Link, Royal Society for the Protection of Birds, Royal Society of Ulster Architects, and the Wildfowl and Wetlands Trust.

3.3 Many of these respondents, while supportive of the use of SuDS, expressed concern that ongoing issues would need to be resolved, and policy measures and a regulatory framework progressed, to enable SuDS to be widely adopted. Some suggested that SuDS should be a mandatory requirement for all new developments and SuDS policy should be closely aligned with planning policy and building regulations in future. Along with these issues, respondents called for the development of clear guidance in relation to:

- post-construction ownership;
- maintenance requirements and responsibility for maintenance of SuDS;
- health and safety; and
- insurance / public liability.

Natural Flood Management (NFM) and the need for financial incentives

3.4 While there was overall support for NFM measures, several respondents including Ards & North Down Borough Council, Belfast Hills Partnership, National Trust, Royal North of Ireland Yacht Club, Royal Society for the Protection of Birds, Royal Society of Ulster Architects, Ulster Farmers Union, and Woodland Trust stressed that in order for these to be successfully implemented, the support of both public and private landowners would be necessary. Respondents highlighted the need for new policy and guidance on NFM, and for financial incentives for landowners, for example, through an agri-environmental scheme following a 'payment for outcomes' approach. In some cases where there is a willingness to use land for NFM, the current payment system can mean that it is not financially viable.

Stakeholder consultation, education and engagement

3.5 One of the most commonly expressed views was that buy-in from the public, landowners and relevant stakeholders would be crucial for successful implementation of the Plan. Respondents highlighted the need for positive stakeholder and community engagement to ensure buy-in to schemes, to encourage ownership and to ensure that local amenities used by residents and stakeholders were protected. Through the involvement of local communities and collaborative working many issues could be resolved including the ownership, responsibility and maintenance of SuDS post construction. A number of respondents also pointed out that different areas of government should be working together to find solutions to issues such as finance and to adopt a joined up approach to developing and delivering policy.

3.6 It was generally agreed that an ongoing public education programme would be required to explain the current drainage problems and to reinforce the need for the Living With Water approach. The Confederation of British Industry cited the need for education on flood risk and coastal change and for households and businesses to be empowered to take action to mitigate risks; they referred to it being a 'hearts & minds' issue requiring communication, transparent data and deliverable solutions. The

Department was encouraged that the response to the consultation was so positive and notes that many of the respondents have expressed a willingness to continue to be involved as the Plan is implemented.

- 3.7 The Ulster Farmers' Union highlighted that farmers over the years have put measures in place to fence off water courses and to protect water quality. They added that farmers also adhere to the Nitrates Action Plan to protect water quality and the wider environment.
- 3.8 The following respondents specifically referred to stakeholder engagement concerns: Antrim & Newtownabbey Borough Council, Belfast Hills Partnership, Climate NI, Consumer Council, Institution of Civil Engineers NI, Mid & East Antrim Borough Council, National Trust, NI Water, Royal North of Ireland Yacht Club, Royal Society for the Protection of Birds, Royal Society of Ulster Architects, Royal Yachting Association Northern Ireland, Sinn Fein, West Belfast Partnership and Belfast City Council.

Climate change adaptability and Net Zero Carbon commitment

- 3.9 Several respondents (Climate NI, Institution of Civil Engineers NI, Royal Society of Ulster Architects, Renewed Ambition) felt that the Plan should be better embedded within the context of climate action, whole-life carbon assessments and greenhouse gas mitigation, particularly for the hard engineered solutions such as WwTW upgrades, and that a precautionary approach should be taken through use of the most recent climate change projections. The Confederation of British Industry also stressed how investment in strategic infrastructure, such as delivery of the Living With Water Programme, could provide a unique opportunity to invest in a low carbon future and help to create jobs and enable economic growth.
- 3.10 Responses included a request to assess all opportunities and solutions identified in the Plan for their contribution to achieving Net Zero Carbon, detailing of the evidence in this regard, and an assessment of alternatives where necessary. Another suggestion was the need to examine the use of potential bio-treatment systems for WwTW and,

where possible, to avoid energy-intensive extensive pumping or transfer of flows between WwTW.

Clarity on details and funding for blue/green infrastructure opportunities

- 3.11 The overall response to the proposed opportunities for blue/green infrastructure laid out in the Plan was very positive. However, several respondents including Belfast Hills Partnership, Climate NI, Department of Finance, Institution of Civil Engineers NI, Mid & East Antrim Borough Council, Royal North of Ireland Yacht Club, Royal Society for the Protection of Birds, Royal Society of Ulster Architects, one Private Individual and Belfast City Council highlighted the need for further clarity in relation to these options.
- 3.12 These respondents considered that the blue/green proposals in the Plan were less clearly defined than hard engineered solutions, in terms of the detail, costings and timescales. They stressed the need for blue/green approaches to be invested in and developed prior to, or at least in tandem with, hard infrastructure approaches, as this could reduce the scope and cost required for hard solutions, and ensure the best possible outcomes.
- 3.13 Whilst the £201 million budget for blue/green infrastructure was welcomed, some respondents queried whether this investment was aspirational at this stage, and when or how it might develop. They sought confirmation that this budget should at least be secured against implementation, and pointed out that innovative finance arrangements would be necessary to deliver these projects, which might include public/private partnerships. Further information was also sought on the allocation of funding for each geographical Study Area and the timing and availability of same.

Clarity regarding ownership and future management and maintenance requirements and associated costs of blue/green infrastructure.

- 3.14 Several respondents including Belfast City Council, Institution of Civil Engineers NI, Mid & East Antrim Borough Council and Royal Society for the Protection of Birds felt

that there needed to be clear policy regarding the responsibility and maintenance of blue/green infrastructure post construction. They felt that arrangements must be established for the future maintenance/replacement of all types of catchment based drainage solutions, including SuDS, as well as detail as to who would be responsible. They felt that the Plan should make some provision for whole life costs - depending on proposals this could include the need for new machinery, additional staff resources and management of increased invasive species.

Need for long term funding and phasing of the Plan

- 3.15 A number of respondents, including Belfast City Council and the Confederation of British Industry, called for increased certainty around multi-year funding and the urgent need to accelerate implementation of the Plan, with delivery being contingent on funding. Respondents referenced the legacy of underfunding; the hybrid status of NI Water that constrains their ability to borrow outside of the Department; that this is not a sustainable funding model and that alternative options must be considered; and the need to prioritise schemes to address capacity constraints and negative responses to planning applications.
- 3.16 Whilst welcoming the Plan, the Confederation of British Industry specifically pointed to the lifespan of the work (12 year programme) and the importance of delivering projects in the early years to address these system capacity constraints. They also called for appropriate investment in design for exceedance infrastructure.

4. NEXT STEPS – WAY FORWARD

- 4.1 This report, along with the detailed Departmental response to each consultation comment received (Annex A) and the updates to the final Plan, form the Department's overall response to the consultation exercise.
- 4.2 Once the final Plan has been approved by the Minister, Nichola Mallon, and the Northern Ireland Executive, the LWWP will move to the delivery phase of the Plan.
- 4.3 The Department has been preparing for the delivery phase by establishing a series of Catchment Delivery Plans which will co-ordinate and integrate all of the schemes that are being taken forward in each catchment, to ensure they meet the needs of all LWWP partner organisation.
- 4.4 The map below shows the 8 proposed Catchment Delivery Plans (CDPs) that will be developed and delivered across the Plan area. A ninth CDP will cover the masterplan for the works required at the six WwTWs that discharge into Belfast Lough.

Proposed Catchment Plan Areas

- 1 Belfast NSW
- 2 Whitehouse
- 3 Greenisland
- 4 Carrickfergus
- 5 Seahill
- 6 Dundonald
- 7 Holywood
- 8 East Belfast / Connswater



- 4.5 Once a CDP for a given geographical area has been approved by the LWWP Board, work can begin to develop business cases, appraisals and designs for the individual drainage projects that it contains.
- 4.6 The Department's LWWP Team will coordinate and manage the development, delivery and funding of the individual CDP projects which will include feasibility studies, modelling work, construction works, with a strong emphasis on local community engagement.
- 4.7 The CDPs will be used to address the main points raised in this consultation exercise, including:
- Partnership working
 - Consideration and delivery of integrated holistic solutions
 - Full engagement with all LWWP partners
 - Full engagement with all stakeholders
 - Establish and maintain extensive local community engagement
 - Educate and inform public on the LWW approach.

It is planned to have the first iteration of the Catchment Delivery Plans drafted by the autumn of 2021.

APPENDIX A

Stakeholder Consultation Events during the public consultation period

Name	Date
NIHE (Belfast) Officials	16 October 2020
Antrim & Newtownabbey Borough Council Officials	22 October 2020
Ards & North Down Borough Council Officials	23 October 2020
Belfast City Council Elected Reps	23 October 2020 & Dec '20
Lisburn & Castlereagh City Council Officials	23 October 2020
Mid & East Antrim Borough Council Officials	27 October 2020
Departmental Committee	18 November 2020
Ards & North Down Borough Council Elected Reps	19 November 2020
NIHE (Derry) – Officials	19 November 2020
Derry and Strabane District Council – Officials	26 November 2020
Mid & East Antrim Borough Council Elected Reps	30 November 2020
CIWEM	2 December 2020
Lisburn and Castlereagh City Council – Elected Reps	2 December 2020
National Trust	10 December 2020
Webinar on LWW in Belfast and NFM	14 December 2020
NI Environment Link	14 December 2020
Ulster Farmers Union	21 December 2020
Antrim and Newtownabbey BC – Elected Reps	4 January 2021
Belfast City Council South Area Working Group	4 January 2021
Belfast City Council West Area Working Group	5 January 2021
Belfast City Council East Area Working Group	6 January 2021
Belfast City Council North Area Working Group	6 January 2021
NILGA	12 January 2021
BCC Resilience & Sustainability Board	21 January 2021
Ulster Angling Federation & Lagan River Trust	27 January 2021
CBI	10 February 2021
BCC Strategic Policy & Resources Committee	19 February 2021
Regional Community Resilience Groups (DFI Rivers)	10 March 2021

APPENDIX B

List of Consultation Respondents

1	Antrim & Newtownabbey Borough Council
2	Ards & North Down Borough Council
3	Belfast Hills Partnership
4	Climate NI
5	Consumer Council
6	DAERA
7	Member of the Public #1
8	Institute of Civil Engineers (ICE)
9	Kier Integrated Services
10	Mid & East Antrim Borough Council
11	Minister for Agriculture, Gordon Lyons, MLA
12	National Trust
13	NI Water
14	Northern Ireland Environment Link (NIEL)
15	NI Local Government Association (NILGA)
16	Royal North of Ireland Yacht Club
17	Royal Society for the Protection of Birds (RSPB)
18	Royal Society of Ulster Architects (RSUA)
19	Royal Yachting Association Northern Ireland
20	Sinn Fein
21	Ulster Farmers Union (UFU)
22	Woodland Trust
23	Wildfowl and Wetlands Trust
24	Private Individual 1
25	Private Individual 2
26	Private Individual 3
27	Private Individual 4
28	Renewed Ambition
29	West Belfast Partnership
30	Belfast City Council
31	CBI NI

APPENDIX C - Detailed summary of all the comments received and the Departmental response.

Respondent	Comment	Department's Response
Antrim & Newtownabbey Council	Supportive of priorities identified for improved drainage and wastewater management in the North Foreshore study area, particularly the Whitehouse/Mallusk sub-catchment area.	Department notes and welcomes the support of Antrim & Newtownabbey Borough Council.
	Recognise importance of improvement works at Whitehouse Park & requests priority given to addressing issues in the Borough.	Comment noted and issues such as those raised at Whitehouse Park will be considered and consulted on as part of the Catchment Delivery Plan process referred to in Chapter 13 of the Plan.
	Council content to discuss improvement options identified for the Valley Leisure Centre/Park/V36.	Comment noted and any options put forward for Valley Leisure Centre will be considered and consulted on as part of the Catchment Delivery Plan process.
	Request that in relation to works in the area that the ecology is protected (e.g. Gideon's Green area).	Comment noted and environmental issues such as those raised at Gideon's Green will be considered and consulted on at scheme level as part of the Catchment Delivery Plan process.
	Request that amenity of residents & stakeholders is protected (e.g. NI Children's Hospice) and that positive engagement takes place.	Stakeholder and community engagement will be a key element of the Catchment Delivery Plan process.
	Council welcomes further engagement on suitable areas within the Borough and costings.	Stakeholder and community engagement will be a key element of the Catchment Delivery Plan process.
	Welcome prioritisation of Whitehouse/Mallusk catchment, and further engagement on Whitehouse/Mallusk works. Note essential this work progresses without delay to enable social & commercial developments to proceed.	Comment noted and will be considered and consulted on as part of the Catchment Delivery Plan process.
	Council wish to continue to engage with DfI & other statutory partners to ensure the range of opportunity based solutions are realised within the indicative timeframe.	Department notes and welcomes the support of Antrim & Newtownabbey Borough Council. Stakeholder and community engagement will be a key element of the Catchment Delivery Plan process.

Respondent	Comment	Department's Response
Ards & North Down Borough Council	Recognise relevance of LWWP outputs (policy measures) to ongoing LDP formulation, and acknowledge that DfI is progressing policy work to resolve current issues that will enable soft SuDS to be widely adopted.	The Department recognises the need to develop policy to enable soft SuDS to be widely adopted; this is reflected in Chapter 6 of the Plan.
	Note DFI is developing new policy and guidance to encourage public and private landowners to utilise their land for Natural Flood Management including tree planting, wetlands, flood storage and attenuation.	Comment noted. Department is developing policy on Natural Flood Management (NFM) and this is reflected in Chapter 6 of the Plan.
	LDP team look forward to further engagement with DfI on policy development and wider general principles.	Department notes and welcomes the support of Ards & North Down Borough Council. Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.
	Infrastructure of the WWTWs and the need for significant investment in these to be prioritised is an essential output of the LWWP.	Comment noted and will be considered and consulted on as part of the Catchment Delivery Plan process.
Belfast Hills Partnership	A positive health and safety argument and mitigation plans will be required to pre-empt residential concerns of open water and must therefore be designed into schemes.	Comments noted around health and safety and mitigations to allay concerns. The need to promote the LWWP approach is recognised in Ch6 (Section 3) and any issues or concerns will be addressed through consideration and consultation at scheme level as part of the Catchment Delivery Plan process.
	Not clear from the report exactly what and where the proposed measures are in the catchments.	Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process.
	Given much of the work will be on private land in the upper catchments, discussion needs to be held as soon as possible with those landowners who will be most impacted by changes e.g. farmers who may be expected to live and work with wet fields for much of the year.	Comment noted for future working and assessment by Department. Note stakeholders will be fully consulted with during the next stage of the Plan as part of the Catchment Delivery Plan process.
	Rural aspects of works have to be well resourced – financially and with support and expertise in e.g. upland flood management. Will land be vested or incentives provided?	Comment noted. Department understands and recognises the need for more clarity on potential financial incentives for Natural Flood Management (NFM) and is developing policy on NFM which is referred to in Chapter 6 of the Plan.

Respondent	Comment	Department's Response
	Blackstaff area - It is not clear how some of the proposals will affect local people e.g. what will major features such as interceptor walls look like and affect local residents?	Stakeholder and community engagement will be a key element of the Catchment Delivery Plan process.
	Blackstaff area - Some of the issues such as water quality in Colin Glen do not appear to have been addressed ref pg91.	One of the plan objectives for the Blackstaff study area shown on P90 is to 'contribute to achieving Good Ecological Status in the Colin Glen River' and the measures proposed on P91 aim to do this.
	Blackstaff area - Additional opportunity to integrate these measures through bringing together those organisations and groups which have a vital role to play to delivering NFM, in particular in the upland areas of these catchments. Belfast Hills Partnership would be willing to facilitate meetings, workshops and site visits to share and exchange best practice and expertise in this work area.	Department notes and welcomes the support of Belfast Hills Partnership and the offer to run workshops. The Department will continue to engage with Belfast Hills Partnership as part of the Catchment Delivery Plan process.
	Until there are specific and detailed measures for the Belfast Hills within Ballymurphy, Glenmachan, Colin Glen and the Farset catchments it is difficult to comment.	Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process.
	It is critical to set down a priority list of actions so that resources can be best targeted to bring the most benefit.	Comment noted. Priorities will be developed through the proposed Catchment Delivery Plan process.
Climate NI	Integrated approach needed and must be tied closely to development of any Infrastructure Commission (MAPI).	Department notes and welcomes the support of Climate NI for the integrated approach being adopted by the Plan.
	Assert that 'do-nothing' scenario threatens basic function and operation of water and drainage infrastructure and not undertaking the Plan would fail and disregard need to future proof the system against climate change.	Department notes and welcomes the support of Climate NI for the Plan.

Respondent	Comment	Department's Response
	<p>Recommend other policies that should feature in the strategic context section of the LWWP, in helping to embed the plan within context of climate action: UNFCCC Paris Agreement, UK Climate Act 2008, Strategic Planning Policy Statement, Community Planning Process such as Belfast Agenda, Climate change adaptation plans of Councils, including 5 in LWWP area, ARUP 'Infrastructure Climate Change Risk Assessment' report regarding future impacts projected for infrastructure in Belfast.</p>	<p>Noted. The strategic context section is aimed at giving an overview of the key strategic drivers for the LWWP. It is not intended to cover all relevant policies.</p>
	<p>Other non-climate specific policies also of relevance: Bathing Water Directive, MSFD, Marine Act (NI), Draft Marine Plan, Marine Licencing and Marine Protected Areas, Sustainable Agricultural Land Management Strategy.</p>	<p>Noted. The strategic context section is aimed at giving an overview of the key strategic drivers for the LWWP. It is not intended to cover all relevant policies and or legislation.</p>
	<p>SuDS – current situation of adoption as a barrier to SuDS installation not as difficult to resolve as made out. Must be an urgent focus of LWWP partners, to coordinate staff and finance and provide clarity and plan of action within months. Maintenance costs will be lower than hard infrastructure and damages from inadequate urban drainage.</p>	<p>The Department recognises the need to develop policy to enable soft SuDS to be widely adopted; this is reflected in Chapter 6 of the Plan.</p>
	<p>Note lack of detail on 'new arrangements' required for green infrastructure element, and when or how they will be developed.</p>	<p>Comment noted. Department understands and recognises the need for more detail on the 'new arrangements' for blue/green infrastructure and this will be developed as part of the Catchment Delivery Plan process.</p>
	<p>SuDS adoption issue does not seem to be resolved yet. Representation must be made to DAERA to see what could be codified and resourced through regional climate legislation.</p>	<p>Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted with as this policy is developed; this is reflected in Chapter 6 of the Plan.</p>
	<p>Increased use of SuDS and blue/green infrastructure through LWWP could be opportunity to work with organisations such as Regional Community Resilience Group.</p>	<p>Comment noted for future working and assessment by Department. Stakeholder and community engagement will be a key element of the Catchment Delivery Plan process.</p>

Respondent	Comment	Department's Response
	LWWP should aim to use implementation, guidance documents and design principles to generate momentum for behaviour change in government departments, key anchor institutions such as universities, and schools, and also developers.	Comment noted for future working and assessment by Department. A communication strategy will be developed as part of the Catchment Delivery Plan process.
	Investment on Education and Awareness, Monitoring and Enforcement (e.g. fly tipping prevention) would also be worthwhile, to reduce chemicals including medications, hormones and fertilizers impacting on the environment.	Comment noted. The need to continue public awareness campaigns is recognised in Chapter 6 of the Plan (Section 3).
	LWWP must ensure developers and other relevant stakeholders are sufficiently informed in order to meet design requirements. Could be an area of friction requiring government action, e.g. Integrated Drainage Planning Investment Guide or DfI public and private landowners guidance could provide this information and guidance.	Comment noted. Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.
	LWWP and the catchment approach could also help with the development of a more cohesive shoreline management strategy for the region, as sea-level rise becomes a greater issue throughout the coming decades.	Comment noted. The Catchment Delivery Plan process will facilitate joined-up working among key stakeholders and delivery partners (inc. DAERA).
	Whole-life carbon assessments - currently no mention of these given the intensity of concrete solutions listed, will be extremely important as part of NI's fair contribution to the UK net-zero target by 2050.	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.
	IDIP Guide- should be based on most recent climate change projection data (understand process using data from UKCP09, but precautionary approach using Met Office UKCP18 RCP 8.5 would make sense, as well as using new datasets such as 2.2km convection resolving models, which could be important for modelling changes in heavy summer rainfall events.	Noted, UKCP09 is currently being used by DfI for climate change projection data. DfI has not yet implemented guidance incorporating UKCP18. The most relevant climate change projection data will be taken into account at detailed design stage.
	Enforcement – IDIP Guidance should be enforceable as part of the remit of any future Infrastructure commission. Vital to develop a coordinated policy of developing on brownfield sites, and SuDS adoption.	Comment noted. Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.

Respondent	Comment	Department's Response
	Integrated drainage modelling – should be based on most recent Met Office Climate projections, using precautionary approach from UKCP18 instead of current use of UKCP09. This is an important factor, which should not be overlooked.	Noted, UKCP09 is currently being used by DfI for climate change projection data. DfI has not yet implemented guidance incorporating UKCP18. The most relevant climate change projection data will be taken into account at detailed design stage.
	LWWP design principles and DfI public & private landowner guidance - supportive of this but note lack of further detail on implementation of either, in terms of timelines, resource or enforcement, which will be vital to ensuring the impacts of the approach.	Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process.
	Legislative influence – LWWP must integrate & influence across region, including energy strategy, new climate change legislation, housing executive plans for development and local planning in general.	Comment noted. The LWWP approach will facilitate joined-up working among key stakeholders and delivery partners (inc. Planning and Housing Authorities).
	Procurement practices appraisals and business cases – should include consideration of climate resilience, and perhaps provide opportunity for information and training helping to influence behaviour change	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.
	Maintenance – important for implementation, and suggests needs priority in terms of forecasting how schedules and types of maintenance are likely to change, and finalising SuDS adoption, perhaps through infrastructure commission, but in first instance through LWWP project team.	Comment noted. Department understands and recognises the need for more detail on the 'new arrangements' for blue/green infrastructure and this will be developed as part of the Catchment Delivery Plan process.
	Delivery phasing – need for a joined-up approach to implementation to ensure projects are staggered for best possible outcomes.	Comment noted. Priorities will be developed through the proposed Catchment Delivery Plan process.
	LWWP should be adaptive and responsive to changes over time as conditions and data improves. This can be with modelling and inclusion of new Met Office data and extend to issues such as maintenance and procurement. Vital to have a two way conversation between LWW and executive/cross-departmental climate working groups over the coming years	Comment noted. LWWP will engage with all relevant stakeholders to identify data and information that will help inform the development of proposals.

Respondent	Comment	Department's Response
	Chapter 11 - Climatic factors indicator listed in table is DfI Rivers climate change flood extents and receptor data. As above, does not give a precautionary approach using the most recent UKCP18 data which should be the basis for decision making.	Noted, UKCP09 is currently being used by DfI for climate change projection data. DfI has not yet implemented guidance incorporating UKCP18. The most relevant climate change projection data will be taken into account at detailed design stage.
	GHG mitigation as part of the huge concrete usage in hard redevelopment of 6 WWTWs does not appear to have been considered, and government should seek to reduce or offset these where possible. Important that information on the whole life carbon is gathered and considered as part of any further assessment.	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.
	In relation to extending Sea outfalls in Belfast Lough, protected areas are not mentioned as 'Pressures and Issues' in chapter 9. Pumping discharge into the middle of Belfast Lough may impact of the recent discovery of Native Oysters and an MCZ for Quahog, so discharges must be properly treated first.	The presence of the MCZ in Belfast Lough is mentioned in the Baseline Biodiversity section p.31, information has been added regarding the designated species at the site. The presence of the MCZ has been discussed in the baseline section (Section 8.5 p.130) and biodiversity assessment (p.134) for IDIP4 .
	CSOs should have real time sensors measuring flow as is the case in GB. Water Companies in GB currently share this data with Surfers Against Sewage which helps people using the water to be aware if there is likely to be overspill in their area. The recently completed EU SWIM project has trialled how to communicate to the public water quality through an app and digital signage.	Comment noted for future working and assessment by DfI and NI Water.

Respondent	Comment	Department's Response
	<p>The HRA should take into account recent research on Coastal Erosion (Baseline Study and Gap Analysis of Coastal Erosion Risk Management NI), as well as ASSIs and MCZs in Belfast Lough in making sure that upgraded outfalls meet at least minimum environmental treatment standards.</p>	<p>The suggested coastal erosion research has been reviewed, and it is considered that the outcomes cannot be naturally taken into account in this strategic level HRA. As the HRA is designed to assess implications on European (SAC, SPA and Ramsar) designated sites, it is considered that discussion of ASSIs and MCZs is outside the scope of this report. However, the presence of the MCZ and ASSIs has been taken into account in the Baseline and environmental assessment within the SEA Environmental Report. Environmental standards relating to discharge is acknowledged in the HRA report, where it is noted that depending on the environmental standards, there can be up to six stages in the sewage treatment process. The requirement of discharge to meet minimum environmental treatment standard is a matter of policy and regulation and must be addressed at the project level when designing and assessing individual discharge projects seeking development consent.</p>
	<p>More detail required on number of key issues, including clarity on whether the £200m for green/blue infrastructure is purely aspirational at this stage and how or when that might develop.</p>	<p>Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP and the estimated cost remains c. £200m. Costs will be refined as schemes are fully developed through the Catchment Delivery Plan process.</p>
	<p>Additional innovative funding and implementation approaches should also be considered to reflect cross-departmental and regional importance of the principles at the core of the LWWP. Further to this, perhaps the addition of the Executive Office to the LWWP interdepartmental advisory group could be beneficial, not least to ensure cross-departmental interaction with the information from the IEM and IDM being undertaken by the LWWP steering group.</p>	<p>The future resourcing and governance arrangements for delivery of the LWWP will be informed by the outworkings of a Gateway Review.</p>
<p>Consumer Council</p>	<p>Fit for purpose drainage and wastewater infrastructure is fundamental to achieving the aims of the New Decade, New Approach agreement, and at least two of the outcomes of the NI Executive's draft Programme for Government – 'We live and work sustainably – protecting the environment' and</p>	<p>Comment noted. The Department welcomes the Consumer Council's acknowledgement of the issues facing our drainage and wastewater infrastructure.</p>

Respondent	Comment	Department's Response
	<p>'Our economy is globally competitive, regionally balanced and carbon-neutral'.</p>	
	<p>In 2014 research, majority of consumers (60%) supported the use of hard and soft sustainable drainage solutions, while ¾ supported seeking ways to prevent flooding through more sustainable, less expensive methods of managing rain water above ground.</p>	<p>Comment noted. The Department notes positive findings from Consumer Council research (2014).</p>
	<p>Consumers commented on the importance of good planning, the effect of development and housing, and the reduction of green areas contributing to drainage issues and increasing the likelihood of flooding.</p>	<p>Comment noted. The Department notes positive findings from Consumer Council research (2014).</p>
	<p>Consumers raised questions on soft SuDS, centring on clarity and certainty around planning guidelines; who will 'own' the SuDS; is ownership transferred to the householder; who will be responsible and pay for the maintenance of the SuDS; and who will be responsible for any insurance and public liability issues. More work will be needed to provide clarity to avoid creating future problems for consumers.</p>	<p>Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted with as this policy is developed; this is reflected in Chapter 6 of the Plan.</p>
	<p>Specific area plans should ensure that community involvement is built into their development. CC are a member of the Regional Community Resilience Group (RCRG), which works directly with households and communities at flood risk to lower that risk and help prepare household and flood action plans. Have witnessed the benefits that can be delivered through direct community involvement and participation in water management schemes, and encourage DFI's LWWP Division to incorporate this approach as it develops specific plans for the areas identified in the consultation.</p>	<p>Comment noted for future working and assessment by Department. Stakeholder and community engagement will be a key element of the Catchment Delivery Plan process.</p>

Respondent	Comment	Department's Response
	Ongoing consumer engagement, e.g. NI Water's '3Ps' to protect the sewer network - encourage DFI to work with water stakeholders in the consideration of the development of trials and pilot studies to test different methods of consumer engagement and their efficacy at changing consumer behaviour as part of the community engagement for the LWWP	Comment noted. The need to continue public awareness campaigns is recognised in Chapter 6 of the Plan (Section 3). A communication strategy will be developed as part of the Catchment Delivery Plan process.
	As a member of the Output Review Group noted in the plan we look forward to receiving updates on the LWWP and seeing the benefits being delivered for consumers	Comment noted. Department will engage with the Consumer Council on any new policy requirements and delivery of the Plan.
DAERA (NED)	Would like to see the outcomes and mitigation measures from the SEA and HRA reflected in the plan, and in the development of any projects and works proposed. DAERA remind DfI that, under the Wildlife and Natural Environment Act (NI) 2011, DfI has a duty to conserve biodiversity.	Noted. Section 11.18 of the final plan states that 'SEA and HRA mitigation measures have been recommended and provided in Section 9.1 of the SEA Environmental Report'.
DAERA (Marine Plan Team)	In the SEA, the baseline evidence and effects on the marine environment have been, for the most part, considered and explicitly drawn out in a transparent manner within the assessment and discussion of impacts.	Comment noted
	UK Marine Strategy (MSFD) – appears a gap in the use of descriptors contained within the MSFD to determine the impact of the Plan on the status of marine & coastal waters. Environmental protection and improvement measures for marine waters and aspects of coastal waters, not covered by WFD, are set out in the UK Marine Strategy developed under MSFD. In coastal waters, both WFD and MSFD apply – MSFD for aspects of 'good environmental status' that are not addressed by WFD e.g. litter and aspects of biodiversity. Inclusion of specific reference to the UK Marine Strategy absent from baseline, as well as the assessment and discussion of impacts.	Information has been added to the Baseline Section for Water p. 44-48 regarding the MSFD, and the UK Marine Strategy. Consideration of the UK Marine Strategy and MSFD has been added to the baseline for water within the IDIP4 assessment (p.134), and for relevant descriptors within the Biodiversity and Water sections of the IDIP4 assessment.
	Draft Marine Plan for Northern Ireland absent from Table 6.1 at Regional / Sub-Regional Level, yet included in Appendix D.	This Plan has been added to Table 6.1

Respondent	Comment	Department's Response
DAERA (Inland Fisheries)	Will provide advice on the general principles of the Plan at this stage and will provide comment and should be consulted when each specific part of the plan is applied for during the planning approval process.	Comment noted for future working and assessment by Dfl. Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.
	Generally content with the Plan, SEA and HRA in its' assessment of the potential impacts of flood protection and solutions to potential flooding as an overarching view of the catchments incorporated within it.	Comment noted.
	Impacts of building structures within watercourses such as leaky dams etc. should be considered in relation to fish passage for all migratory species in the freshwater environment. European eels, sea trout, salmon and lamprey are likely or have the potential to be present. Any structures which are to be introduced should have an associated maintenance plan.	Comment noted for future working and assessment by Dfl.
	Recommend that Table 6.1 of the SEA should include at International / EU level the NASCO treaty and in the National or Regional section should include the Fisheries Act (NI) 1966 (as amended).	The 'Convention for the Conservation of Salmon in the North Atlantic Ocean (1982) and Fisheries Act (NI) 1966 (as amended) have been added to Table 6.1, and details provided on these in Appendix D.
	Under the Fisheries Act (NI) 1966 as amended, Inland Fisheries ensure conservation, protection, development and improvement of salmon and inland fisheries. Main sections relevant to LWWP plan are 25 (Department functions/duty), 47 (pollution penalties), 48 (permits), 54 (fish passes). Principles therein should be incorporated when developing specific applications of the LWWP plan. IF will continue to respond to any planning application which has the potential to impact on fisheries interests.	Comment noted for future working and assessment by Dfl.
DAERA (Marine Licensing)	All construction or deposition works below the MHWST mark are subject to licensing under the Marine and Coastal Access Act 2009. If any elements of a construction project crosses the intertidal area below the MHWST mark, contact must be made with the Marine Licensing Team to apply for a Marine Construction Licence.	Comment noted for future working and assessment by Dfl.

Respondent	Comment	Department's Response
DAERA (Water Management Unit)	Content with the assessment process, no specific comments to add other than to reinforce the need for the SEA outcomes to be reflected in the final plan.	Noted. Section 11.18 of the final plan states that 'SEA and HRA mitigation measures have been recommended and provided in Section 9.1 of the SEA Environmental Report'.
DAERA (Drinking Water Inspectorate)	Private Water Supplies - developer should, if appropriate, undertake a scoping exercise to determine the location of any private water supplies (search details linked). Note that there have been searches conducted to establish existence of registered PWS in the area, but recommend this is reviewed prior to individual phases or areas of work commencing to ensure up to date.	Comment noted for future working and assessment by DfI.
	SEA ER: In 'Abbreviations' section, DWI has been incorrectly referenced as DWO.	Noted and amended.
	SEA ER: In Table 6.1, the Drinking Water Directive legislation (DWD(98/83 EC) is referred to, this is currently under review so should include reference to consideration of the updated version of the legislation going forward.	Noted. The amended DWD is now in force since 16 December 2020, and Table 6.1 and Appendix D have been updated to reflect this.
DAERA (HED)	SEA: provided comments on scoping and welcome inclusion of recommended changes.	Comment noted.
	SEA: recommend legislative references reviewed to include 'The Planning Act (NI) 2011 to capture legislative context for listed heritage assets. Protected under Section 80. Also update referencing on page ix to include NI legislation.	Noted. The Planning Act (NI) 2011 has been added to Table 6.1, referenced in the Baseline Section 5.9 (p.52), and in the Non-technical summary (p.ix).
	Chapter 5 Baseline, Section 5.9 – potential impacts on non-designated heritage assets such as unlisted vernacular buildings and historic buildings of local importance, should also be taken into account.	Noted. The presence of non-designated heritage assets is acknowledged and has been added to Baseline Section 5.9 (p.52).
	Chapter 5 Baseline, Section 5.9 – SEA should also include potential impacts on designated Conservation Areas and Areas of Townscape Character, which occur within the scope of the geographical area – of particular consideration within Belfast City Centre, Holywood & Carrickfergus.	The presence of Conservation Areas and Areas of Townscape Character / Areas of Village Character within the Plan area have been added to Baseline Section 5.9 (p.52), and the potential for impacts within these areas highlighted on p.53.

Respondent	Comment	Department's Response
	Chapter 7 – welcome proposals which seek to conserve and reuse heritage trails/infrastructure and other assets of heritage significance as part of the solution for providing effective water management. As proposals develop further opportunities may emerge and should be regularly monitored (HED map-viewer).	Comment noted for future working and assessment by Dfl. Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.
	Emphasise the need for pre-application engagement with HED to inform proposal development to ensure negative impacts properly considered and positive potential realised.	Comment noted for future working and assessment by Dfl. Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.
	<i>Blackstaff CA1 Clowney</i> – welcome initiative to utilise and reconnect the existing mill race to Boodles Dam; potential to partner with related programmes also welcomed.	Comment noted for future working and assessment by Dfl. Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.
	<i>Blackstaff CA3 Ballymurphy</i> – Falls Park is on Register of Historic Parks and Gardens (AN/181), therefore any proposed changes should be based on a comprehensive understanding of the significance of the park so that no harm is caused to its overall character, principle components or setting.	This park has now been referenced in the IDIP1 assessment (p.102) to include site sensitivity. Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.
	<i>Blackstaff CA5 Lower Blackstaff</i> – Drumglass Park also on Register of Historic Parks and Gardens (AN/161) (see above comment). Work here may also affect the setting of the associated listed Gate Lodge including Gates and Screens (HB26/18/008).	This park has now been referenced in the IDIP1 assessment (p.102) to include site sensitivity. Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.
	Blackstaff - Above parks cited in evidence base, but assessment fails to recognise the potential negative impacts of the proposal with regard to the historic environment, particularly with sufficient cognizance of the policy protections that apply to these sites.	These parks have now been referenced in the IDIP1 assessment (p.102) to include site sensitivity. Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.
	<i>Connswater & Lagan Embankment CA8 Connswater</i> - Lisnabreeny area importance for its historic environment, including the scheduled rath. In addition to impacts on setting and direct impacts, consideration should be afforded to potential impacts on heritage assets caused by changes in hydrology.	The site sensitivity in this area has now been referenced in the IDIP2 assessment (p.116). Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.

Respondent	Comment	Department's Response
	<p>Connswater & Lagan Embankment <i>CA11 Dundonald</i> – Identified opportunities link to the CUIDF – ED has contributed. HED involved as a stakeholder. Gazetteer of Historic Nucleated Urban Settlements (GHNUS) will be a useful reference when developing proposals and can be provided.</p>	<p>Comment noted for future working and assessment by Dfl. Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.</p>
	<p><i>North Foreshore CA12 Fortwilliam</i> – welcome initiatives to utilise historic watercourses associated with industrial heritage at Carr’s Glen River Corridor. Proposed interventions should be informed by a heritage impacts assessment, which includes a statement of significance, outlining why the changes are required and how they have been justified.</p>	<p>Comment noted for future working and assessment by Dfl. Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.</p>
	<p><i>North Foreshore CA12 Fortwilliam</i> - Proposals involving woodland creation, riparian buffer strips & drain blocking in Cavehill Country Park/Belfast Castle/Belfast Zoo has potential for impacts on the setting of the Grade A listed Belfast Castle (HB26/51/001 A) and associated landscaped demesne which is included on the Register (AN-009).</p>	<p>The site sensitivity in this area has now been referenced in the IDIP3 assessment (p.130). Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.</p>
	<p><i>North Foreshore CA13 Whitehouse/Mallusk</i> - proposals for stormwater attenuation on the UJJ site should be planned so as not to adversely impacts the setting of the two listed buildings on the site; Dalriada House (HB21/08/004 A) and its associated gate lodge (HB21/8/004 B).</p>	<p>The site sensitivity in this area has now been referenced in the IDIP3 assessment (p.130). Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.</p>
	<p>North Foreshore CA13 Whitehouse/Mallusk - opportunities to utilise industrial heritage assets such as the former Mill Pond at Mossley Mill is welcomed.</p>	<p>Comment noted.</p>
	<p><i>North Foreshore CA14 Greenisland</i> – Proposed works at Knockagh Trooperslane include woodland creation, riparian buffer strips & drain blocking. Caution that proposed landscape changes could impact the listed County Antrim War Memorial (HB22/04/013) which sits prominently in the landscape, the scheduled Barrow (ANT052:038) and a range of other identified sites and monuments.</p>	<p>The site sensitivity in this area has now been referenced in the IDIP3 assessment (p.130). Note stakeholders will be fully consulted with during the next stage of project scoping and feasibility studies.</p>

Respondent	Comment	Department's Response
	Chapter 8 Assessment – In Do-Nothing scenario, question the neutral scoring for medium and long-term impacts on heritage assets given the identified potential long-term flooding risks. Risk of flooding particularly in urban areas could have a potential negative impact on listed and historic buildings in addition to historic sites and monuments. In the interests of consistency – Reference to The Planning Act (NI) 2011 should also be included.	In the 'Do-Nothing scenario, FRMPs will continue to operate albeit in a less integrated manner. The potential for increased flood risk is taken into account under climate, which includes the risks for heritage features. The scoring for cultural heritage in the Do Nothing scenario takes into account the potential for direct effects via the building of water management features.
	Mitigation & Monitoring Table 9.1, p.145 Potential impact 15 – considers this should be revised to also capture direct impacts on heritage assets, not just impacts on setting. Onsite supervision may be required by a conservation consultant.	Noted. The potential for direct impacts, and suggested mitigation has been added to Table 9.1.
	Mitigation & Monitoring Table 9.1, p.145 Potential impact 16 – engagement with HED during development of proposals recommended.	Noted. The suggested mitigation has been added to Table 9.1.
	Mitigation & Monitoring Table 9.1, p.145 Potential impact 23 - revise to include potential for direct impacts, including changes in hydrology. Cite conservation and agreement with HED in the mitigation measure and include need for proposals to be developed by conservation architects in addition to archaeologists, where appropriate.	Noted. The potential for direct impacts, and suggested mitigation has been added to Table 9.1.
	Section 9.1 monitoring – welcome monitoring of proposals, but monitoring indicators and targets should be more meaningful and set out clear targets as a baseline. At present Table 9.3 reflects potential to achieve things; should capture need to identify and record designated/recorded heritage assets which may potentially be impacted by the proposal, and research to determine impacts on unidentified sites	The targets for Cultural Heritage have been established in the SEOs and sub-objectives in section 3.2, including the potential for positive targets. Targets only apply as part of the SEOs. The monitoring section lays out how the indicator is heading in a positive or a negative direction, bearing in mind that the Plan does not have specific targets for heritage.
	Table 9.3 Other indicators to consider – no. of scheduled monument consents sought for works that entailed conservation of a heritage asset, no. of archaeological excavations conducted as mitigation to works.	The Indicators were established as part of the SEOs in Section 3.2. However, these suggestions have been included in the column for 'Possible Data and Responsible Authority' in Table 9.3 .

Respondent	Comment	Department's Response
	Table 9.3 Targets – no adverse impacts on protected sites and monuments / new archaeological discovered as a result of works appropriately recorded and available for public consultation in the NISMR.	The Targets were established as part of the SEOs in Section 3.2. However, these suggestions have been included in the column for 'Possible Data and Responsible Authority' in Table 9.3.
	Table 9.3 Also encourage opportunity for positive monitoring, i.e. no. heritage assets conserved, reused as part of water management slutions.	These suggestions have been included in the column for 'Possible Data and Responsible Authority' in Table 9.3.
DAERA (Climate Change Unit)	SEA pg. 193 - title of programme is Northern Ireland Climate Change <u>Adaptation</u> Programme (NICCAP2), 2019-2024.	Noted and amended.
Member of the Public	Mention potential for Little Victoria St carpark to hold water during heavy rainfall.	Comment noted and will be considered and consulted on as part of the Catchment Delivery Plan process referred to in Chapter 13 of the Plan.
	Believe should be a commitment that all new development should deal with heavy rainfall by integrating sustainable drainage into their hard surfaces to hold water on site	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted with as this policy is developed; this is reflected in Chapter 6 of the Plan.
	Question that Dfl do not have landscape architects in house – could help integrate different projects and oversee strategies if employed in Dfl as well as DAERA.	The future resourcing and governance arrangements for delivery of the LWWP will be informed by the outworkings of a Gateway Review.
	Inner Belfast Lough: proposals are quite strategic, interesting to see how they will become detailed proposals with funding.	Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP. Costs will be refined as schemes are fully developed through the Catchment Delivery Plan process.
	Integrated approach necessary to produce best joint outcomes – very overarching strategies without hard cash ring-fenced to deliver the projects will lead to failure.	The Department welcomes the support for the integrated approach and the need for ring-fenced funding. Funding for the Plan will, however, be subject to the normal budgetary approval processes.
Institution of Civil Engineers	Blue/green SuDS proposals correct way to start but will need to be modelled carefully to ensure cost effectiveness sufficiently far into the future to justify expense in construction and optimise design.	Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process.

Respondent	Comment	Department's Response
	<p>WWTWs should also be fully modelled/assessed to ensure design optimised, expenditure justified and will remain effective far into the future. Net Zero Carbon emissions – solutions which may increase treatment capacity using natural biotechnology should be fully investigated before building hard engineered solutions.</p>	<p>Each scheme will be revisited and fully consulted on at the next stage of the Plan. The upgrades needed at the WwTWs will be informed by detailed Integrated Environmental Modelling.</p>
	<p>Hard engineering solutions should be considered together with green and blue infrastructure solutions to realise optimum whole life cost against benefits and should be reviewed in the context of total value to multiple stakeholders. Proposals for new projects and retrofit of existing sewerage and drainage systems should also be considered.</p>	<p>Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process.</p>
	<p>Approach needs to be comprehensively modelled to ensure design of SUDs development is optimised and will remain effective sufficiently far into the future. In particular, approach should ensure CSOs operate only in most extreme weather conditions.</p>	<p>Agreed. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.</p>
	<p>Important that comprehensive public re-education undertaken and sustained, to inform on SuDS project intentions and continue to educate on water reuse and wastewater treatment issues. Should build on existing channels of work by NI Water, supported by incentivisation schemes.</p>	<p>Comment noted. The need for education and ongoing public awareness is recognised in Chapter 6 of the Plan (Section 3).</p>
	<p>Residents & businesses should be encouraged and incentivised to provide as much green space as possible to minimise rainwater runoff and reuse rainwater for washing and flushing purposes.</p>	<p>Comment noted. The need for education and ongoing public awareness is recognised in Chapter 6 of the Plan (Section 3).</p>
	<p>Must have an ongoing public education programme.</p>	<p>Comment noted. The need for education and ongoing public awareness is recognised in Chapter 6 of the Plan (Section 3).</p>
	<p>Health and safety management and communication important to ensure stakeholders & public understand risks ad areas to be avoided following rainfall events. Education needed to change public and landowner perceptions of</p>	<p>Comment noted. The need for education and ongoing public awareness is recognised in Chapter 6 of the Plan (Section 3).</p>

Respondent	Comment	Department's Response
	water and understand flooding positive approach within designated areas.	
	Where potential sources of pollution to natural watercourses from economic activity identified, should be addressed individually with the economic entity concerned & a solution identified that contributes to overall plan.	Comment noted. Potential sources of pollution will be considered as part of the Catchment Delivery Plan process.
	Hard engineered solution in plan clearly defined, costed & programmed, while soft engineering solutions less clearly defined – should be further assessed/developed prior to implementing hard solutions, as could reduce scope/cost of hard solutions and tie in with Net Zero Carbon requirements.	Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process.
	Engagement with others who discharge into and impact water quality also necessary, e.g. agricultural land users, harbour etc. to ensure optimum result for water quality across all stakeholders. Presume engagement with NIEA has taken/will take place to assess the LWWP costs (including over the whole life of the asset) when compared to the environmental outcomes provided in the water quality discharged, such as for reaching shellfish water standards, across all combined discharge sources. Engagements such as these are worth highlighting in the LWWP for clarity.	Comment noted. Broad stakeholder engagement is a key element of the LLWP/Catchment Delivery Plan process. NIEA is represented on the LWWP Board and IEM will identify areas for investment in terms of wastewater treatment and diffuse pollution.
	Blackstaff - Distillery St pumping station historically contributed to pollution in Lower Blackstaff River (now culverted) – if still the case would need to be examined and rectified.	Comment noted and issues such as those raised at Distillery Street will be considered and consulted on as part of the Catchment Delivery Plan process referred to in Chapter 13 of the Plan .
	Blackstaff - Regular maintenance of Blackstaff culvert though City Centre needed, including desilting.	Comment noted and issues such as those raised in terms of the Blackstaff Culvert will be considered and consulted on as part of the Catchment Delivery Plan process referred to in Chapter 13 of the Plan.

Respondent	Comment	Department's Response
	Connswater & Lagan Embankment - Regular maintenance of Blackstaff culvert though City Centre needed, including desilting.	Comment noted and issues such as those raised in terms of the Blackstaff Culvert will be considered and consulted on as part of the Catchment Delivery Plan process referred to in Chapter 13 of the Plan.
	North Foreshore - Solutions that involve extensive pumping to treat/transfer flows should be avoided as far as possible to reduce energy consumption and assist with achieving Net Zero Carbon target.	Comment noted. The future upgrades to the WwTWs will be informed by detailed IEM.
	Inner Belfast Lough - Solutions that involve extensive pumping to treat/transfer flows should be avoided as far as possible to reduce energy consumption and assist with achieving Net Zero Carbon target.	Comment noted. The future upgrades to the WwTWs will be informed by detailed IEM.
	Inner Belfast Lough - Net Zero Carbon commitment – proposals in the document should show detailed evidence that solutions helping to achieve Net Zero Carbon placed at top of options list & LWWP should lead by example on this.	Comment noted. The future upgrades to the WwTWs will be informed by detailed IEM.
	Inner Belfast Lough - Regarding expansion of treatment capacity, would like to see evidence of careful examination of potential use of latest efficient biotreatment systems which may help to minimise costly new build & improve capacity and discharge.	Comment noted. The future upgrades to the WwTWs will be informed by detailed IEM.
	All opportunities & solutions identified should be assessed for their contribution to Net Zero Carbon commitment and where necessary, alternative solutions sought to support this achievement.	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.
	Modelling & assessment work needs to be carried out as an urgent priority, and will enable sensitivity assessment of various future scenarios, e.g. future development projections & review of Climate Emergency scenarios.	Comment noted. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.
	Plans for operation and maintenance need to be considered and agreed early-on in development of projects and as part of the whole life cost appraisal which is supported and is recommended.	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.

Respondent	Comment	Department's Response
	All proposals reviewed to assess potential to contribute to Net Zero Carbon commitment within required timescales.	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.
	Examine & assess alternatives that might better achieve Net Zero Carbon objective.	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.
	More detailed modelling & assessment to ensure proposals provide required cost:benefit ratio and will continue to do so sufficiently far into future.	Comment noted. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.
	Soft solutions further developed & assessed as implementation has potential to reduce scope and cost of some hard solutions.	Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process.
	Support approach in Ch.13.2 of assessing whole life costs and recommend method to do this included at an early stage of projects and included in business case template. Catchment level options appraisal may require many schemes & options to be assessed simultaneously at an early stage.	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.
Kier Integrated Services	Generally confirming that plans are achievable and realistic.	Department notes and welcomes the support from Kier Integrated Services.
Mid East Antrim Borough Council	Hoped that the principles detailed in LWWP can be introduced across NI.	Comment noted. The Department plans to issue an Integrated Drainage Investment Planning Guide and Programme to allow strategic drainage infrastructure plans to be developed across Northern Ireland.
	Full consideration should be given to the wider areas covered within the plan, including North Foreshore, and ensuring the adequate resourcing is allocated proportionally to these areas.	Comment noted. The Plan covers the greater Belfast area and priorities will be developed through the proposed Catchment Delivery Plan process.
	Need to ensure sustainable drainage at forefront of developers thinking and that they contribute accordingly to solutions.	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted with as this policy is developed; this is reflected in Chapter 6 of the Plan.

Respondent	Comment	Department's Response
	Government have responsibility in terms of policy making & ensuring regulatory body in place to manage required change effectively. Government (central & local) should lead by ensuring their developments use sustainable drainage.	Comment noted. Department understands and recognises the need for clear policy and regulation and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Using green spaces in urban areas not always appropriate as needed by public for exercise (vital corporate council objective); however in certain circumstances and with careful design objectives can work together and these highly encouraged.	Comment noted. Stakeholders will be fully consulted as schemes are developed as part of the Catchment Delivery Plan process.
	Measures to help prevent/reduce flooding of homes & businesses and reduce sewage spilling into waterbodies supported, providing can accommodate reasonable objectives of other stakeholders.	Comment noted. The Department welcomes the support of Mid & East Antrim Borough Council for flood prevention measures. Stakeholders will be fully consulted as schemes are developed as part of the Catchment Delivery Plan process.
	Greater emphasis should be on developers to include sustainable drainage within all schemes as standard, including works by government and other statutory authorities.	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted with as this policy is developed; this is reflected in Chapter 6 of the Plan.
	Without backing of a sustainable drainage policy and a regulatory body to advise and oversee work, catchment based approach will not suffice on its own.	Comment noted. Department understands and recognises the need for clear policy and regulation and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Good to highlight/signpost forthcoming planning policy for all catchment based drainage solutions, including SuDS, as a policy measure in the context of the report. As planning policies have a key role, good if this emphasised.	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders including Planning authorities will be consulted with as this policy is developed; this is reflected in Chapter 6 of the Plan.
	Council in discussions with LWWP on potential sites in Carrickfergus & Greenisland, and willing to fully collaborate in identifying opportunities on council owned assets, provided Council objectives not compromised.	The Department notes and welcomes the support of Mid & East Antrim Borough Council. The Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.
	Further information required to establish arrangements for future maintenance/replacement of all types of catchment based drainage solutions, including SuDS, and identify who will be responsible - vital component in making plan work as	Comment noted. The Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted with as this policy is developed; this is reflected in Chapter 6 of the Plan.

Respondent	Comment	Department's Response
	it does not make provision for whole life costs. A signpost to the SuDS manual may also be helpful.	
	Although the plan refers to projects over £10million being taken on by a Major Projects Team, there needs to be a regulatory body to advise on and assist in approving various scales and types of drainage projects.	Comment noted. Schemes will be consulted on as part of the Catchment Delivery Plan process referred to in Chapter 13 of the Plan.
	North Foreshore - Beneficial to have more detail on facilitation of sustainable development to accommodate new housing and other developments. Due to significant capacity problems at Carrickfergus & Greenisland, a more detailed timeframe identifying when capacity will become available in each area also required.	Comment noted. The Department will continue to engage with Mid & East Antrim Borough Council as schemes are developed as part of the Catchment Delivery Plan process.
	North Foreshore - Developing greater Carrickfergus area (housing, employment, infrastructure, tourism) key strategic priorities for Council, and imperative the water and sewage infrastructure will support such growth and development.	Comment noted. The Department will continue to engage with Mid & East Antrim Borough Council as schemes are developed as part of the Catchment Delivery Plan process.
	Inner Belfast Lough - Objective to facilitate sustainable development by increasing capacity within WWTW & sewerage networks to support new connections (Section 10.4) - difficult to find a balance between this objective and the additional new housing/other development that will be constructed throughout the plan period and beyond.	Comment noted. The Department will continue to engage with Mid & East Antrim Borough Council as schemes are developed as part of the Catchment Delivery Plan process.
	Inner Belfast Lough - Would be beneficial if more detail provided on what this means in the context of drainage capacity and pressures to accommodate new housing and other developments. A more detailed timeframe identifying when capacity will become available in each of the areas is also required.	Comment noted. The Department will continue to engage with Mid & East Antrim Borough Council as schemes are developed as part of the Catchment Delivery Plan process.
	North Foreshore - As above comment to Q4 on Carrickfergus & Greenisland site discussions and willingness to explore other opportunities.	The Council's support is welcomed. The Department will continue to engage with Mid & East Antrim Borough Council as schemes are developed as part of the Catchment Delivery Plan process.

Respondent	Comment	Department's Response
	Inner Belfast Lough - Regarding potential transfer of some sewage load from Whitehouse WWTW to Greenisland WWTW to free up capacity - significant capacity problems currently at Carrickfergus, and Council opinion that any limited spare capacity at Greenisland should be used to relieve pressure on Carrickfergus system as a priority over any other areas in the study.	Comment noted. The upgrade of Carrickfergus WwTW is included in the Plan and Department will continue to engage with Mid & East Antrim Borouh Council this is developed as part of the Catchment Delivery Plan process.
	North Foreshore - As above, comments on need for sustainable drainage policy and regulatory body, and focus on public and private developers to include SuDS within all schemes.	Comment noted. Department understands and recognises the need for clear SuDS policy and regulation and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	North Foreshore - Urgent need for WWTW and sewerage system upgrades, particularly in Carrickfergus & every effort should be made to ensure necessary funding secured to enable these works in a timely fashion.	The Department welcomes the support for funding of the Plan which will be subject to the normal budgetary approval processes.
	Inner Belfast Lough - As above comment on transfer of flows	Comment noted. The upgrade of Carrickfergus WwTW is included in the Plan and Department will continue to engage with Mid & East Antrim Borouh Council this is developed as part of the Catchment Delivery Plan process.
	Inner Belfast Lough - Plans to upgrade sea outfalls at both Greenisland & Carrickfergus welcomed.	The Department notes and welcomes the support of Mid & East Antrim Borough Council for sea outfall upgrades.
	Inner Belfast Lough - As above comment regarding funding.	The Department welcomes the support for funding of the Plan which will be subject to the normal budgetary approval processes.
	Investment should focus on schemes which will make noticeable difference immediately to gain buy in of public and developers to enable future private funding. If developer contributions to be used, there should be efforts to ensure they are not scared off by levels of investment mentioned in plan.	Comment noted. Priorities will be developed through the proposed Catchment Delivery Plan process.
	Investment in blue/green infrastructure vital as will reduce need for some hard engineering infrastructure.	The Department notes and welcomes the support of Mid & East Antrim Borough Council for blue/green infrastructure.

Respondent	Comment	Department's Response
	More information on level of funding being allocated to each geographical study area & a more detailed programme of works indicating completion dates for proposed works in each area would be beneficial to allow all relevant stakeholders to plan accordingly.	Comment noted. Priorities, work programmes and timings will be developed through the proposed Catchment Delivery Plan process.
	As previous comment regarding arrangements for future maintenance/replacement of all types of catchment based drainage.	Comment noted. The Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
MLA Gordon Lyons	Should it be deemed appropriate to designate Belfast Lough as a Sensitive Area under the Urban Wastewater Treatment (NI) Regulations in order to protect the Shellfish Waters, then the wastewater investment outlined in the Living with Water programme in Belfast is likely to become a regulatory requirement.	Comment noted and will be taken into consideration as part of the Catchment Delivery Plan process
National Trust	Welcome plan, opportunity to engage as a stakeholder and further future engagement.	The support for the Plan is welcomed and the Department will continue to engage with the National Trust as schemes are developed through of the Catchment Delivery Plan process.
	Would like to see investments in soft infrastructure including SuDS. As mentioned in Plan, some policy changes or improvements will be required for the Plan to be successful, e.g. uptake of SuDS, particularly soft SuDS, in new developments could be better encouraged through the planning system.	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Important that the right trees are planted in the right places and that maintenance and improvement of other priority habitats, such as peatlands, also considered.	Comment noted and will be taken on board as part of the Catchment Delivery Plan process.
	Any unsatisfactory CSOs should be rectified as a matter of urgency.	Comment noted and will be taken into consideration as part of the Catchment Delivery Plan process.
	Great potential for increasing local water storage in Divis and the Black Mountain area that will in turn increase the capacity of the storm drainage network downstream.	The Department welcomes new opportunities which will be considered and consulted on as part of the Catchment Delivery Plan process referred to in Chapter 13 of the Plan.
	Peatland restoration approaches in the Belfast Hills, including at Divis could be beneficial.	Comment noted and will be taken on board as part of the Catchment Delivery Plan process.

Respondent	Comment	Department's Response
	NFM - vital that right solutions are used in the right places; look forward to seeing the new policy and guidance being developed by DfI to encourage public and private landowners to utilise their land for NFM.	Comment noted. Department is developing policy on Natural Flood Management (NFM) and is reflected in Chapter 6 of the Plan.
	Majority of landowners in an area will need to be on board with plans for them to be fully successful.	Comment noted. Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.
	Essential to secure introduction of a new system of agricultural support in NI that takes a 'Payment for Outcomes' approach and incentivises farmers in Northern Ireland to deliver for nature and the environment.	Comment noted. Department understands and recognises the need for more clarity on potential financial incentives for NFM and is developing policy on Natural Flood Management (NFM) and is reflected in Chapter 6 of the Plan.
	Need government agencies and Departments to provide a clear and robust regulatory framework and funding mechanism to enable key stakeholders to play their part.	Comment noted. The final Plan includes new governance arrangements for the delivery phase.
	Blackstaff Clowney catchment – patchwork of private land ownership between upper Belfast Hills and city make implementing sustainable interventions throughout system particularly challenging & any potential water quality issues relating to agriculture in this area would need to be addressed.	Comment noted. Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.
	Blackstaff Clowney catchment – Would like to see a sustainable attenuation plan that also takes into account need for greener access to Belfast Hills & establishment of a green corridor between the city and Divis and The Black Mountain, with sites already identified at the Whiterock Road & Glencairn Park. This will require input from multiple landowners, both private and public, as well as engagement with local communities and Belfast City Council to support the implementation of access routes.	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process.
	Blackstaff Ballymurphy catchment - As above, should consider how access into Belfast Hills can be enhanced, e.g. through green corridor between city and Divis and the Black Mountain, particularly along the top of Whiterock Road.	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process.

Respondent	Comment	Department's Response
	Blackstaff Colin Glen catchment - Given NT ownership of Divis, which hosts the headwaters for the Colin River, and of Upper Colin Glen, it would be good to understand where the water quality issues lie. Monitoring may be required in order to understand the causes and capture where interventions are required.	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.
	Blackstaff Colin Glen catchment - The development of Lower Colin Glen – including the cutting down of trees to facilitate different forms of recreation – as well as the loss of trees to ash dieback may present a risk to the Plan's ambitions for natural flood prevention methods in the area.	Comment noted and will be taken on board as part of the Catchment Delivery Plan process.
	Blackstaff Colin Glen catchment - As with the sub-catchments bordering NT landholdings, would like to see a sustainable attenuation plan put in place that balances ambition to see a green corridor between the city and Divis and The Black Mountain along Colin Glen.	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process.
	Connswater & Lagan Embankment Connswater - Plan mentions water quality issues in a range of areas within the Connswater sub-catchment. Given NT landownership at Cregagh Glen and Lisnabreeny, would be good to understand where water quality issues lie; monitoring may be required to understand causes and capture where interventions required.	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.
	Connswater & Lagan Embankment Connswater - As with the Belfast Hills, the land in the Castlereagh and Craigantlet Hills is owned by various private landowners, making implementing sustainable interventions throughout the sub-catchment particularly challenging. Any potential water quality issues relating to agriculture in this area would need to be addressed.	Comment noted. Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.
	Inner Belfast Lough Agree with issues identified and objectives, particularly objective to contribute to water quality improvements and achieve GEP and GES in	The Department notes and welcomes the support of the National Trust.

Respondent	Comment	Department's Response
	catchment watercourse, Belfast Harbour and the Inner Lough.	
	Blackstaff Given NT ownership of Divis and Black Mountain and Upper Colin Glen, NT can play a key role in this area in implementing measures and improvements.	The Department welcomes the support of the National Trust and will continue to engage with them it as schemes are developed through the Catchment Delivery Plan process.
	Blackstaff Support proposed opportunity-based solutions for the Belfast Hills – NT specifically mentioned as partners for Clowney sub-catchment.	The Department welcomes the support of the National Trust and will continue to engage with them it as schemes are developed through the Catchment Delivery Plan process.
	Blackstaff Note that main opportunities for NT in the Blackstaff Study Area lie in the Colin Glen sub-catchment, however change to land management practices NT land at Divis and The Black Mountain could have a positive impact throughout the Study Area.	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process.
	Blackstaff Would welcome specific inclusion in solutions mentioned for Colin Glen Sub-catchment.	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process.
	Potential partnership working with the Colin Glen Trust is mentioned for possible river and floodplain restoration works along the Colin Glen Corridor. While working with the Colin Glen Trust, we also believe it would be advantageous for the National Trust to be part of this working group on the Colin Glen River Corridor due to our own land ownership in Upper Colin Glen.	The Department welcomes the support of the National Trust and will continue to engage with them it as schemes are developed through the Catchment Delivery Plan process.
	Blackstaff Huge opportunities for managing upper parts of catchments, but important right solutions implemented in right places.	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process.
	Connswater & Lagan Embankment NT can play a role in this area due to ownership of Lisnabreeny and Cregagh Glen, and welcome partnership opportunities in Loop River Corridor and Castlereagh Hills.	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process.

Respondent	Comment	Department's Response
	Connswater & Lagan Embankment At Lisnabreeny, as well as wetland project, there are opportunities for tree planting (NT plans to plant 11ha).	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process.
	Connswater & Lagan Embankment Agree getting private landowners in surrounding hills onboard in this area may require partnership working with DAERA and a link to an Agri-Environment scheme – this would also be applicable in the Belfast Hills.	Comment noted. The Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.
	Connswater & Lagan Embankment Believe it is time to consider creation of a Castlereagh Hills Trust / Partnership to help join up strategy for hills as those in the west are co-ordinated.	Comment noted and the Department will continue to engage with the National Trust on issues such as this as schemes are developed through the Catchment Delivery Plan process.
	North Foreshore Plan mentions partnership with NT to manage upper catchments in this area. NT do not have land holdings in the Cave Hill area, but keen to continue partnership working in this area.	Comment noted and the Department will continue to engage with the National Trust, other key stakeholder and local communities as schemes are developed through the Catchment Delivery Plan process.
	Connswater & Lagan Embankment Would like to see scope extended to include more of the River Lagan, including NT site at Minnowburn.	Comment noted. The scope of the Plan has been set in relation to the drainage and wastewater networks that feed into the WwTW that discharge directly into Belfast Lough. The Department is happy to discuss Minnowburn site further with the National Trust.
	Particularly welcome proposed £201 million investment in blue/green infrastructure, which will be needed to gain real benefits from the blue/green proposals, along with landowner and community involvement and outreach / awareness raising.	Comment noted. The Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan. The need to continue public awareness campaigns is recognised in Chapter 6 of the Plan (Section 3).
	Important that there is alignment between the LWWP/DfI and DAERA in their funding support and outcomes. Alongside levels of investment identified in this Plan, future agriculture and environment funding schemes must adequately support landowners and land managers to undertake nature-friendly improvements on their land.	Comment noted. Any proposed schemes will be brought forward in partnership with other LWW partners including DAERA/NIEA as part of the Catchment Delivery Plan process.
NI Water	Recommend that before and during the implementation phase, DfI proactively leads stakeholder engagement, so that everyone who could be impacted by the construction	Comment noted. Stakeholder and community engagement will be a key element of the Catchment Delivery Plan process.

Respondent	Comment	Department's Response
	activities understands why it is happening and is so important.	
Northern Ireland Environment Link (NIEL)	Supportive of the approach. No comments on Qs 5, 6 & 7, but note that DfI appear to have addressed the main issues relating to the study areas.	Department notes and welcomes the support of the Northern Ireland Environment Link
	NIEL members concerned that the consultation ignores the Lagan and 95% of its catchment in terms of the flood risk and nutrient input into the river, inner lough and shellfish waters.	Comment noted. Scope of the Plan has been set in relation to the drainage and wastewater networks that feed into the WWTW that discharge directly into Belfast Lough.
	Support more widespread use of SuDS, and the policy proposal to make SuDS and blue/green infrastructure the preferred drainage solution in all new developments. If this cannot be made mandatory, NIEL would like to see clear targets set for SuDS and blue/green infrastructure rather than just being the preferred option.	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	DfI could also explore working with Councils on developing policy to discourage homeowners from removing their gardens.	Comment noted. The need for education and ongoing public awareness is recognised in Chapter 6 of the Plan (Section 3).
	Ensure DfI has appropriate expertise for implementing NFM, or seek externally.	The future resourcing and governance arrangements for delivery of the LWWP will be informed by the outworkings of a Gateway Review.
	Resourcing of monitoring of barriers to fish passage.	Comment noted and issues around fish passage will be considered and consulted on as part of the Catchment Delivery Plan process referred to in Chapter 13 of the Plan.
	Provision of land to hold water should not be limited to urban areas; providing space for rivers to flood in upstream areas likely to be much more successful.	Comment noted. Department welcomes the support for LWWP proposals to attenuate water particularly in the upper catchment and this will be taken on board as part of the Catchment Delivery Plan process.
	In terms of the catchment approach, important to learn from successful examples, such as South West Water's Upstream Thinking project.	Comment noted. The Department has and will continue to use other examples of best practice in delivering the Plan.

Respondent	Comment	Department's Response
	Agree levels of investment identified are necessary, as a minimum.	The Department welcomes the support for funding the Plan.
NILGA	Generally welcoming and supportive of the plan and its approach. Answers to questionnaire focussed on issues of region relevance, therefore Qs 5-7 not answered.	Department notes and welcomes the support of NILGA for the Plan and the approach being adopted.
	Particularly welcome inclusion of the wide range of partners in design and implementation of LWWP, and encouraging to see 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.	Comment noted and the support for joined-up working is welcome. The Department will continue to engage with key stakeholders and local communities as schemes are developed through the Catchment Delivery Plan process.
Royal North of Ireland Yacht Club	May be issues with stakeholder engagement and buy-in for the use of urban green spaces, carparks, etc., which will need sensitive handling and careful management.	Comment noted. The Department will continue to engage with key stakeholders and local communities as schemes are developed through the Catchment Delivery Plan process.
	May be possible to consider if additional 'green space' or permeable surfaces could be incorporated in proposals for future brownfield and inner-city developments to aid drainage and enhance amenities and the public realm.	Comment noted. Department understands and recognises the need for clear SuDS/NFM policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	For Holywood & Seahill catchments, highlight recent deterioration in gully maintenance and weed clearance, which must impede surface water run-off and contribute to increased risk of pluvial flooding.	Comment noted. The availability of resource budgets will determine the level of individual organisations maintenance programme.
	Particularly supportive of proposals for tree planting and riparian buffer strips.	The Department welcomes the support for this initiative.
	Note some catchment areas encompass extensive areas of privately owned lands (Castlereagh, Craigantlet and Holywood Hills), and believe important to engage constructively with landowners (e.g. via DAERA and UFU) to incentivise enhancement of agri-management and adoption of appropriate agri-environmental schemes to contribute to improving field run-off quality,.	Comment noted. The Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.

Respondent	Comment	Department's Response
	<p>Acknowledge majority of improvements proposed relate to upgrading of hard-engineered infrastructure & encourage DfI and partner agencies to prioritise, wherever possible, the blue/green aspects of the strategy which they believe would have wider and positive environmental, societal and economic impacts.</p>	<p>Comment noted. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.</p>
	<p>investment in plan and significant benefits it can deliver should be a priority for the Executive. Further delays and underinvestment would heighten risks identified and could result in much higher future costs.</p>	<p>The Department welcomes the support for funding the Plan and the potential implications of underfunding and delay of the Plan.</p>
RSPB	<p>Use of green infrastructure and SuDS should be mandatory in any future developments and are key design features to increase resilience to climate change, through legislation and embedding into planning policy and building regulations.</p>	<p>Comment noted. Department understands and recognises the need for clear SuDS/NFM policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.</p>
	<p>Would like to see increased partnership by the local planning authority, government, and developers to deliver thoughtful, ecologically sustainable development that focuses on the management of urban water resources and environmental protection in residential, commercial and industrial developments (RSPB research at Kingsbrook Estate).</p>	<p>Comment noted. Department understands and recognises the need for clear SuDS/NFM policy and key stakeholders, including Planning Authorities, will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.</p>
	<p>Post Brexit and requirements for water quality standards driven by Europe, a strong NI specific legislative baseline is required as part of a future environmental and agricultural policy framework. The 'polluter pays' principle must be embedded in legislation and upheld through effective regulation and enforcement, to deter and penalise non-compliance with regulatory standards.</p>	<p>Comment noted. Where appropriate, the Department will continue to support DAERA / NIEA on the development and implementation on new policy and legislation required post Brexit.</p>
	<p>While regulatory baseline is important for improving water quality, need robust inspection and enforcement. Opportunity to be more ambitious post-Brexit, and draw on international examples.</p>	<p>Comment noted. Where appropriate, the Department will continue to support DAERA / NIEA in their inspection and enforcement role.</p>

Respondent	Comment	Department's Response
	Development of strategic planning policy in this area is vital, green/blue infrastructure and SuDS must be adopted and promoted across government and be delivered as part of all new development.	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Need to join up the various planning processes in developing a holistic, strategic and collaborative approach for the water environment, e.g. RBMP process does not connect with the Asset Management Plan and Price Review processes resulting in a limited ability to cross-reference and align with business planning by NI Water. Connecting these processes would provide a greater rationale for NI Water to be involved in delivering outcomes for the RBMPs and allow the Utility Regulator to consider RBMP implementation and the delivery of nature-based solutions as part of the final determination process.	Comment noted. The Plan co-ordinates development and delivery of the measures set out in the NI Flood Risk Management Plan, the North Eastern RBMP and NI Water's PC21 within the greater Belfast area.
	Welcome allocation of 14% funding to blue/green infrastructure, however would expect a greater percentage. Imperative that all future projects include aspects of green infrastructure where possible, and forms the fundamental basis rather than an 'add on'.	Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP and the estimated cost remains c. £200m. Costs will be refined as schemes are fully developed through the Catchment Delivery Plan process.
	Use of SuDS should be prioritised, supportive of Section 4 of the Water and Sewerage Services Act (Northern Ireland) 2016 which extends powers to NIW to adopt and require construction of SuDS, and the Institute of Civil Engineers SuDS Route Map published in 2018.	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Use of green infrastructure and SuDS should be mandatory in any future developments. Outline key perceived barriers for lack of widespread adoption of SuDS and potential solutions – regarding safety (community education and warning signage), long-term maintenance (similar required to other infrastructure), lack of availability of public land (also establish incentives for small-scale private	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.

Respondent	Comment	Department's Response
	installations), and costs to beneficiaries ('polluter pays' principle, raising awareness of SuDS benefits).	
	Want commitment to incorporate SuDS as a mandatory requirement in new developments and retrofits; through inclusion in each Council's LDPs as part of any zoned site's key site requirement that must be met for planning to be granted. Revising the Strategic Planning Policy Statement (SPPS) to make SuDS mandatory regionally.	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Welcome section on NFM, and intention to develop policy and guidance, however this won't be sufficient alone to deliver the necessary scale. Development of policy around natural flood alleviation on privately owned land should form part of a wider strategic policy and incentivisation for landowners to deliver public goods on their land. This could also include provision of and maintenance of public access, as well as delivering public goods, such as flood alleviation and carbon storage.	Comment noted. Department understands and recognises the need for clear NFM policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Planting appropriate trees in the right places can reduce flood risk – essential native trees are planted in the right places. NFM policy should also include peatland restoration to enhance water storage, as well as biodiversity benefits, which is particularly relevant in the Belfast Hills.	Comment noted. Department understands and recognises the need for clear NFM policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Biodiversity net gain can have a role in encouraging installation, but must be additional to current requirements to deliver blue/green infrastructure.	Comment noted. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.

Respondent	Comment	Department's Response
	<p>To ensure a strategic approach to dealing with issues affecting the water environment, DAERA should lead development of a land strategy for NI, with direct relevance for water quality and ensuring a holistic approach – this proposal is supported by the UK Committee on Climate Change Report (2019). An increased focus on nature-based solutions will play a critical role in mitigating and adapting to climate change within the land sector.</p>	<p>Comment noted. Where appropriate, the Department will support DAERA in the development of any land strategy for NI.</p>
	<p>Sustainable Catchment Management Programmes - Utility Regulator and NI Water, through Price Control is an important mechanism for funding SCaMP and investing in delivery of nature-based solutions at scale. Ongoing investment is required through SCaMP involving NI Water and NGOs working together to address land management issues that negatively affect both wildlife and water quality.</p>	<p>Comment noted. SCaMP and / or Nature Based solutions are identified as priorities both in the Plan and in the Minister's Social and Environmental Guidance for Water and Sewerage Services.</p>
	<p>Sustainable Catchment Management Programmes - Previous examples of successful partnership delivery should provide a model for future application of SCaMP. In partnership with NI Water, RSPB has been involved in a large-scale peatland restoration project on the Garron Plateau in North Antrim, where habitat restoration has improved drinking water quality and reduced NI Water's treatment costs (further details provided).</p>	<p>Comment noted. The Department has and will continue to use other examples of best practice in delivering the Plan.</p>
	<p>Blackstaff - Barrier to strategy success is achieving buy-in from local communities; a strong element of community engagement is critical. RSPB NI have been working closely with the Greater Village Regeneration Trust (GVRT) on several urban biodiversity projects in the area; success of these has been down to the level of community engagement.</p>	<p>Comment noted. The Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.</p>
	<p>North Foreshore - Excellent opportunity missed for additional green infrastructure, sustainable drainage and management of the former landfill site at the North Foreshore. RSPB working in partnership with Carlin Planning & Giants Park Belfast to create a new Nature Reserve which would be an integrated element of a larger</p>	<p>The Department welcomes information on any new opportunities and these will be explored as part of the Catchment Delivery Plan process.</p>

Respondent	Comment	Department's Response
	<p>200 acre leisure and recreational space (further information provided).</p>	
	<p>Inner Belfast Lough - Concerned about any potential impact on the integrity of Belfast Lough SPA. While a HRA has been undertaken as part of the Living with Water Plan, it is strongly recommended that further consideration is given to the in-combination effects section of the HRA as currently only River Basin Management Plans and Land Use Area Plans have been considered for in-combination effects. There is no detail of any other existing or approved projects/developments considered within the HRA. This should be addressed.</p>	<p>The Belfast Lough SPA Conservation Objectives document was reviewed at the time of appraisal and is cited in the HRA report. Deterioration of the water quality in inner Belfast Lough due to a range of discharges and pollutants is recognised in Section 3.3.6 of the HRA report. Section 3.7.4.7 of the HRA report outlines the new sea outfall infrastructure required to meet water quality objectives. Section 5.1.4.1 identifies a range of RBMPs and LAPs whose implementation could act in combination with implementation of the LWWP and give rise to in-combination effects. It is appropriate at this plan level stage of assessment to consider plans that may act in combination with the LWWP. Existing discharges to Belfast Lough that affect the water quality status have been acknowledged in the HRA report. As no project level developments seeking consent or permission arise at this stage of the Plan, the mitigation strategy adopted seeks to firstly ensure that lower level project assessment is included as part of and embedded within each project that is brought forward as part of Plan implementation; and secondly ensure that measures are put in place to manage and minimise the risk of accidental escape of elevated levels of suspended solids or polluting substances into watercourses through development of an Erosion and Sedimentation Control Plan (ESCP) at the project level.</p>

Respondent	Comment	Department's Response
	<p>Blackstaff - RSPB NI working in partnership with several landowners and land influencers across the Blackstaff Study Area through our Pledge for Nature partnership (includes Belfast Health and Social Care Trust (BHSCT), Translink and the Greater Village Regeneration Trust (GVRT)). If adequate resource was available, this work could be increased and aligned to the LWW Strategy to deliver for its objectives across this 'urbanscape'. The scope of the work here is enormous, currently blue/green infrastructure plans are already afoot but in a small scale. Would be keen to engage with the Department to explore what support and partnership opportunities may exist.</p>	<p>The Department welcomes new opportunities and would look forward engaging further with the RSPB and other stakeholders as schemes are developed through of the Catchment Delivery Plan process.</p>
	<p>Connswater & Lagan Embankment - RSPB NI HQ at Belvoir Park Forest - incredible opportunity here to work in partnership with the local community, BCC, NIHE, Forest Service to create a connected blue/green corridor from the housing estate right down to the river lagan.</p>	<p>Scope of the Plan has been set in relation to the drainage and wastewater networks that feed into the WwTW that discharge directly into Belfast Lough. Happy to discuss Belvoir Park Forest further with RSPB and other stakeholders to bring forward drainage and wastewater management solutions in an integrated fashion.</p>
	<p>North Foreshore - RSPB NI currently working in partnership with Carlin Planning and Giants Park Belfast Ltd, to look for Opportunities for Water Attenuation and SUD's – wider Giants Park development seeks to incorporate Sustainable Drainage solutions and where possible provide additional water attenuation.</p>	<p>The Department welcomes information on any new opportunities and these will be explored as part of the Catchment Delivery Plan process.</p>
	<p>Inner Belfast Lough - Harbour Meadows site – RSPB NI could help connect mosaiced landscape across the 22 ha by George Best Belfast City Airport and the mouth of the Lagan, joining up lands across the Belfast Harbour. This site is in easy reach of the city, and could provide an extraordinary resource to reconnect local people to nature. The site would be designed to absorb flood and stormwaters, while delivering a range of other important functions.</p>	<p>The Department welcomes information on any new opportunities and these will be explored as part of the Catchment Delivery Plan process.</p>

Respondent	Comment	Department's Response
	<p>Support the level of investment set out in the LWWP, but note that innovative finance will be required to deliver on the investment needs required. While they support the use of private finance, nature-based solutions should be viewed as an investment priority for government and should be funded as such; would like to see schemes such as England's Environment Agency's Natural Environment Investment Readiness Fund which attracts innovative public/private funding partnerships.</p>	<p>The Department welcomes the support for funding the Plan; this will be subject to the normal budgetary approval processes.</p>
	<p>Recognise that investment hard engineering necessary, would like to see a greater proportion than the 14% allocated to green and blue infrastructure to ensure this forms the fundamental basis of a new approach.</p>	<p>Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP and the estimated cost remains c. £200m. Costs will be refined as schemes are fully developed through the Catchment Delivery Plan process.</p>
	<p>Adequate funding will require input from across the various stakeholders to deliver partnership projects and investment, and innovative thinking for delivery of multi-benefit outcomes.</p>	<p>Comment noted. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.</p>
	<p>Will require integration and policy cohesion across government Departments, e.g. future agricultural policy based around rewarding farmers for delivery of environmental public goods which play a role in delivering better land management, and improved links between flood management decisions and land use management decisions.</p>	<p>Comment noted. Department understands and recognises the need for more clarity on potential financial incentives for NFM and is developing policy on Natural Flood Management (NFM) as stated in Chapter 6 of the Plan. Stakeholder and community engagement will be a key element of the Catchment Delivery Plan process.</p>
<p>Royal Society of Ulster Architects (RSUA)</p>	<p>RSUA welcomes integrated and collaborative approach, but encourages implementation of further blue/green responses.</p>	<p>Comment noted. The Department welcomes the support for the integrated and collaborative approach. Schemes will be revisited and fully consulted on at the next stage of the Plan. The Plan will seek to maximise the use of Blue/Green infrastructure where possible.</p>

Respondent	Comment	Department's Response
	<p>Important hard engineered approach and blue/green implemented in tandem, so that blue/green not side-lined, suggest whole life carbon assessments carried out to understand environmental impacts.</p>	<p>Comment noted. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.</p>
	<p>Importance of blue/green infrastructure within the CAs should be emphasised and widely communicated as positive mitigative measures, to help ensure that blue/green infrastructure is fully implemented and not subject to value engineering.</p>	<p>Comment noted. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.</p>
	<p>In addition to opportunity-based solutions outlined within LWWP, NI Executive should work closely with the construction industry and design professionals to incorporate flood resilience into Building Regulations and planning policy, to ensure all new developments demonstrate reduced exposure to flooding, as well as participating in the resilience of the local area and catchment.</p>	<p>Comment noted. Department understands and recognises the need for clear policy and regulation in relation to SuDS and NFM and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.</p>
	<p>The Strategic Planning Policy Statement (SPPS) should be included in the strategic context for the LWWP.</p>	<p>Noted. The strategic context section is aimed at giving an overview of the key strategic drivers for the LWWP. It is not intended to cover all relevant policies.</p>
	<p>Suggest term 'grow' used with caution as one of the central reasons for action, as infinite economic growth a key contributor to climate change issues. In reasons for action, should be communicated that careful and responsible investment required to tackle climate change - not just for more growth; but that a reassessment is required of our existing environmental, economic, and social constructs, and lead by informed decision making, this then enforced by policy, to ensure a positive outcome for both natural and man-made ecosystems (as required by UNFCCC Paris Agreement and UK Climate Act 2008). LWWP should relate</p>	<p>The Department recognises the impact of climate change and the importance of long term sustainable growth. The delivery of sustainable drainage and wastewater management infrastructure is a key strategic aim of the Plan.</p>

Respondent	Comment	Department's Response
	efforts to build resilience towards long-term goal of lowering GHG emission and tackling of climate change issues.	
	Existing green spaces, under both public and private ownership, that are ideal for temporary flood water collection and attenuation should be protected by planning policy from new typical developments.	Comment noted. Department understands and recognises the need for clear policy and regulation in relation to SuDS and NFM and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Should also be encouragement for additional new connecting green spaces, especially by private landowners, and endeavours to increase awareness of the importance of these spaces for both water management, wildlife, and our own health and social well-being within urban areas.	Comment noted. Department understands and recognises the need for clear policy and regulation in relation to SuDS and NFM and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Planning system could permit and encourage pilot innovative solutions to drainage and wastewater management within these green spaces and within our urban environments, to develop, test, and open-up discussions about the effectiveness of new approaches in managing flood risk through green/blue infrastructure against 'hard engineered' solutions.	Comment noted. Department understands and recognises the need for clear policy and regulation in relation to SuDS and NFM and key stakeholders including Planning Authorities will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Robust local evidence needed for both local retrofit environments of grey water management against the option of introducing blue/green into new built environments and should be used to influence and enforce behaviour change.	Comment noted. The Department will continue to engage with key stakeholders and local communities as schemes are developed through the Catchment Delivery Plan process.

Respondent	Comment	Department's Response
	Implementation of SuDs critical to ensure flood risk not exacerbated. Further work should be undertaken to promote and ensure adoption of SuDs - uptake of SuDs should be guaranteed and enforced by planning policy and regulations for all new development.	Comment noted. Department understands and recognises the need for clear policy and regulation in relation to SuDS and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Strongly support sustainable green approaches not least NFM for reforestation, restoration of wetlands and of peatlands.	The Department welcomes the support for sustainable green approaches and NFM.
	Catchment approach dependent on cooperation of both public and private landowners who need to be sufficiently informed and supported in designing for a sustainable and effective solution to drainage and wastewater.	Comment noted. The Department will continue to engage with key stakeholders and local communities as schemes are developed through the Catchment Delivery Plan process.
	Government should be prepared to take action to ensure good agricultural land management, to reduce deforestation and agricultural pollution, and to ensure that bad decision making, and even law breaking, is met with suitable penalties.	Comment noted. The Department will continue to engage with DAERA / NIEA on good agricultural practices as part of the LWWP.
	Catchment-based approach requires cross-council co-ordination and effective communication - administrative infrastructure for decision making processes must be in place and robust to ensure that there are no administrative hold-ups, that implementation of the plan is expedient and swift.	Comment noted. The Catchment Delivery Plan process will facilitate joined-up working among key stakeholders and delivery partners.
	Encourages confirmation of what blue/green infrastructure will entail in detail, and for confirmation that such budget is secured against implementation.	Comment noted. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.
RYA Northern Ireland	Support any proposals that may take reasonable steps to help address water quality or flooding issues, and only where there is no adverse effect on boating activity.	Comment noted. Department welcomes the support of RYA.

Respondent	Comment	Department's Response
	Note that there are wider economic benefits to outdoor recreation (including that on the water) and this is also dependent upon an appropriate and well-managed natural environment.	Comment noted. Department acknowledges the wider benefits and will seek to optimise these benefits where possible.
	Supportive where mitigations do not have an adverse impact on boating activity in the relevant area.	Comment noted. Department welcomes the support of RYA and schemes will be consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process.
	Believe education important part of managing water, e.g. Green Blue joint environmental project developed by RYA and British Marine.	Comment noted. The need to continue public awareness campaigns is recognised in Chapter 6 of the Plan (Section 3). Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.
	Where there may be a case for helping develop appropriate Green and Blue Spaces, SportNI has produced research spanning from 2011 outlining that for every £1.00 that the public sector invests (in outdoor recreation) there is a return of £1.77. Where possible, this may be considered within any planning and economic evaluation of the development of green/ blue spaces.	Comment noted. The Department has and will continue to use other examples of best practice in delivering the Plan.
	The investment and subsequent mitigations should be in consultation with local stakeholders, including land and waters users within each defined area.	The Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.
Sinn Fein	Also essential to address flooding and wastewater issues across NI (note discussion of LWW approach for Derry).	Comment noted. The Department plans to issue an Integrated Drainage Investment Planning Guide and Programme to allow strategic drainage infrastructure plans to be developed across Northern Ireland.
	Important for officials to engage with all stakeholders and seek their views to ensure program meets all objectives.	The Department is committed to ongoing engagement on any new policy requirements and delivery of the Plan.

Respondent	Comment	Department's Response
Ulster Farmer's Union	Disagree with following Plan statement ' <i>Poor land management practices including over- use of fertilizers and poor management of livestock can cause pollution in our rivers and coastal water</i> '. Farmers over the years have invested in protecting water quality, and such statements are not reflective of a whole industry and can alienate people wish to engage with. Farmers have a role to play in NFM in making catchments more resilient.	Comment noted. The Department acknowledges that many farmers have invested in protecting water quality and have a role to play in NFM in making catchments more resilient. However, poor land management practice and land owners that fail to adhere to the Nitrates Directive can cause pollution in our rivers and coastal waters.
	Regarding use of NFM and development of new policy guidance to enable this – UFU supportive of NFM; would like to be involved in development of policy guidance on NFM and considering how to incentivise farmers' participation in schemes. Where NFM utilised on private land, loss of income from agriculture must be compensated and should come from outside the agriculture budget.	UFU support for NFM is welcome. Department understands and recognises the need for clear policy and regulation in relation to NFM and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
Woodland Trust	Welcome catchment approach and use of NFM.	Department notes and welcomes the support of Woodland Trust for the catchment approach and use of NFM.
	In order to enhance biodiversity in green and blue spaces, recommend that a natural capital accounting approach be adopted in the development and delivery of opportunity based solutions.	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.
	Tree planting – would like to see planting of suitable native broadleaf trees in appropriate green urban spaces & recommend tree planting incorporated within policy proposals aimed at enabling wider adoption of soft SuDS.	Comment noted. Department is developing policy on Natural Flood Management (NFM) and SuDS and and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
	Have partnered with Belfast City Council to deliver the Belfast: One Million Trees project, & keen to further partnership working with the four other local councils to develop similar projects.	Comment noted. LWWP also working with BCC on this initiative and welcomes the opportunity to explore further collaborative working.
	Strongly support catchment-based approach. Delivering this will require engaging with a wide range of landowners – WT has experience in delivering landscape projects.	Comment noted. Schemes will be consulted on as part of the Catchment Delivery Plan process referred to in Chapter 13 of the Plan.

Respondent	Comment	Department's Response
	<p>Welcome recognition that policy measures will need to be introduced to encourage and incentivise landowners to use their land for NFM purposes. WT have found that there is a willingness from landowners to explore NFM, but current payment system in upland areas can often mean not financially viable – to successfully deliver NFM, payments to offset earning in upland areas will need to be reviewed.</p>	<p>Comment noted. Department is developing policy on Natural Flood Management (NFM) and SuDS and and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.</p>
	<p>Any proposals should include measures that encourage key landowners to use this land in a way that benefits nature.</p>	<p>Comment noted. Department is developing policy on Natural Flood Management (NFM) and SuDS and and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.</p>
	<p>Seek clarity on whether policy proposals will be supported by funding for strategically important acquisitions.</p>	<p>Comment noted. Funding for the Plan will be subject to the normal budgetary approval processes.</p>
	<p>Whitehouse/Mallusk - WT manage 4 sites in this CA (Carnmoney Hill, Monkstown Wood, Throne Hill, Cave Hill) & agree with pressures and issues identified and objectives set.</p>	<p>Comment noted.</p>
	<p>Carrickfergus - Agree with pressures and issues identified and objectives set.</p>	<p>Comment noted.</p>
	<p>Whitehouse/Mallusk - Welcome inclusion in solutions in Whitehouse/Mallusk and Carrickfergus catchments and also welcome opportunity to work in partnership in other areas. Any solutions at WT sites will need to be in line with charities focus on improving woodland biodiversity and increasing peoples understanding and enjoyment of woodland.</p>	<p>The Department welcomes the support of the Woodland Trust and will continue to engage with them it as schemes are developed through the Catchment Delivery Plan process.</p>
	<p>Whitehouse/Mallusk - Important that right trees planted in right places and maintenance and improvement of other priority habitats such as peatlands in highest part of Belfast Hills also considered.</p>	<p>The Department will continue to engage with the Woodland Trust as schemes are developed through the Catchment Delivery Plan process.</p>

Respondent	Comment	Department's Response
	Whitehouse/Mallusk - Suggest development of existing groups such as Belfast: Million Trees to share technical knowledge & coordinate delivery and development of NFM measures.	Comment noted. LWWP also working with BCC on this initiative and welcomes the opportunity to explore further collaborative working.
	Whitehouse/Mallusk - Support river & floodplain restoration work in partnership with Antrim and Newtownabbey Borough Council, but seek clarity about whether works planned to achieve improved ecological status of Three Mile Water, reduce flood risk or both.	The proposed opportunity-based solution at the Three Mile Water aims to reduce flood risk and also improve ecological status in this waterbody.
	Whitehouse/Mallusk - Manage Carnmoney Hill, and would welcome opportunity to work with landowners on adjacent land in NFM.	The Department welcomes the support of the Woodland Trust and will continue to engage with them it as schemes are developed through the Catchment Delivery Plan process.
	Whitehouse/Mallusk - Manage Cave Hill, and would welcome inclusion as partner in opportunity based solution at Cave Hill Country Park.	Comment noted. The Department will continue to engage with the Woodland Trust as schemes are developed through the Catchment Delivery Plan process.
	Carrickfergus - Manage Oakfield Glen. Welcome inclusion as a partner and keen to explore solutions; primary purpose of Oakfield Glen is for public access, therefore any proposed work for stormwater storage should not adversely affect this.	Comment noted. The Department will continue to engage with the Woodland Trust as schemes are developed through the Catchment Delivery Plan process.
	Carrickfergus - Strongly support solutions at Woodburn & Lough Mourne. Have been working in partnership with NI Water, tree planting and scoping surveys for further planting and welcome working with NI Water to progress further.	Comment noted. The Department will continue to engage with the Woodland Trust and other stakeholders as schemes are developed through the Catchment Delivery Plan process.

Respondent	Comment	Department's Response
	Recognise Plan includes significant amount of further planning, modelling, design and appraisal work to develop outputs. Would like to see a natural capital accounting embedded within the integrated environmental modelling to aid understanding value of ecosystem services and potential impact any proposed measures will have on these.	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.
	As many opportunities identified will require partnership working with a wide range of stakeholders including farmers and private landowners, LWWP and DfI should work in partnership with the DAERA to ensure appropriate agriculture and environment funding schemes in place to support landowners and land managers to undertake nature-friendly improvements on their land. Given the particular focus on upland areas, WT would like to see a review of the payments to offset earnings so that they consider the wider benefits of land beyond its current economic potential.	Comment noted. Department is developing policy on Natural Flood Management (NFM) and SuDS and and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
Wildfowl and Wetlands Trust (WWT)	Generally supportive of approach and partnership working including NGOs.	The Department welcomes the support of the WWT for the approach including partnership working.
	WWT hold carbon sequestration data for numerous sites and habitats in the UK that could assist in understanding the capacity of natural carbon sinks we have in NI.	Comment noted and welcome opportunity to engage further with WWT.
	Supportive of SuDS and would like to see these solutions become a preferred solution with clear targets set for creation (helping fulfil aims of Programme for Government 2016-2021 Outcome 2).	Comment noted. Department understands and recognises the need for clear SuDS policy and key stakeholders will be consulted as the Plan is taken forward; this is reflected in Chapter 6 of the Plan.
Private Individual 1	Investment funding must be ring-fenced so that is it protected from demands for other government needs. Funding streams must be guaranteed and made known every year to allow for strategic and tactical planning, and must be end of year flexibility for funding.	The Department welcomes the support for ring-fenced funding. Funding for the Plan will, however, be subject to the normal budgetary approval processes.
Private Individual 2	Agree with need, approaches and investment requirement.	The Department welcomes the support for the need, approach and investment required. Funding for the Plan will, however, be subject to the normal budgetary approval processes.

Respondent	Comment	Department's Response
Private Individual 3	Specific concern with increasing amount of sw discharged into Enler River from new development at Millmount, and detrimental impacts on individuals land. Request Dfl examine condition of rivers left by developers.	Comment noted and will be considered and consulted on as part of the Catchment Delivery Plan process.
	Keen to be involved in early stages of any LWWP proposals in the area, UFU representative and can facilitate engagement with local committees.	Comment noted. The Department will continue to engage with key stakeholders, including UFU, as schemes are developed through the Catchment Delivery Plan process.
Private Individual 4	Specific concern with a flooding issue relating to sw drainage from Upton Park area. Due to a blocked pipe, rainwater leaves manhole causing flooding to properties in Ormonde Court, Lille Park and Upton Park. Dirty water leading to health issues and property damage.	Comment noted. This is already included as a pressure / issue in the Glenmachan catchment page 86/87.
Renewed Ambition	Essential to maximise LWWP impact so that public and private sector stakeholders do more to promote sustainable development. While committing to UN Sustainable Development Goals is positive, more needs to be done to encourage and embed sustainability in the Plan and schemes that emerge from it, such as a drive to Net Zero Carbon and adaptation. This will address current issues, while helping to mitigate and adapt to future climate change.	Comment noted. This will be considered as part of the process to develop integrated appraisal guidance.
	To move away from a siloed approach to waste water infrastructure, there needs to be a Northern Ireland Executive and Dfl-led approach which promotes better collaboration with all stakeholder parties to find the best outcomes & enable long-term resolution and adoption of sustainable infrastructure. LWWP should be considered within the wider infrastructure investment plans which deal with public and private capital investment.	Comment noted. The Catchment Delivery Plan process will facilitate joined-up working among key stakeholders and delivery partners.
	Government departments need to communicate and collaborate more proactively to ensure future investments maximise the best return on investments for our environment and economy.	Comment noted. The Catchment Delivery Plan process will facilitate joined-up working among key stakeholders and delivery partners.

Respondent	Comment	Department's Response
	Substantial NI Water investment in infrastructure capacity & capability in the city due to lack of programme funding should not prevent/delay economic development. The funding model for water infrastructure needs to be considered to provide greater innovation & flexibility outside the current Block Grant.	Comment noted.
	Clear milestones need to be set out to: outline specific tasks, facilitate funding drawdown and secure a multi-year funding mechanism.	Comment noted. Key milestones including securing the necessary funding at regular intervals, will be developed as part of the delivery phase of the plan.
	There should be a clear definition of what success for the programme looks like and who has ownership and accountability for the constituent elements. Perhaps an outside party needs to be brought in to oversee and provide further guidance?	The future resourcing and governance arrangements for delivery of the LWWP will be informed by the outworkings of the Gateway Review process.
	It is fundamental that the public sector do not use any potential delays to the delivery of the LWWP to add further barriers or constraints to approving developments across the city.	Comment noted. The capacity upgrades needed for future development will be subject to the necessary funding being made available throughout the lifetime of the plan.
West Belfast Partnership	Have inputted to the Belfast City Council consultation response and concur with the major strategic issues outlined therein.	Comment noted.
	In west Belfast, appropriate drainage and wastewater infrastructure is a fundamental enabler of the construction industry and any future growth ambitions. There is a major housing shortage in west Belfast, and investment in infrastructure is essential to enable future house building, as well as development of sites for business and job creation.	Comment noted. The key objectives of the LWW in Belfast plan is to address these issues in an integrated way with all relevant stakeholders.
	WBP believes that meaningful engagement with local communities will be important and may well unlock creative solutions utilising green and blue infrastructure. There is a strong community infrastructure in west Belfast including Neighbourhood renewal partnerships, community groups, park users, local residents and sports clubs with whom the strategic infrastructure group can consult and test solutions.	Comment noted. The Department will continue to engage with key stakeholders, including local community groups, as schemes are developed through the Catchment Delivery Plan process.

Respondent	Comment	Department's Response
	<p>Many schools in west Belfast are eco-schools and can be engaged both as a learning exercise for children but also to provide new ways of managing water flow through our neighbourhoods.</p>	<p>Comment noted. The Department will continue to engage with key stakeholders, including local community groups, as schemes are developed through the Catchment Delivery Plan process. The Department acknowledges the need to continue education and public awareness campaigns and this is recognised in Chapter 6 of the Plan (Section 3).</p>
	<p>With new build housing developments, it may be possible to discourage hard paving in favour of lawns and green spaces.</p>	<p>The Department acknowledges the need to continue education and public awareness campaigns and this is recognised in Chapter 6 of the Plan (Section 3).</p>
	<p>Paucity of open water in west Belfast as many rivers and streams were culverted. LWWP provides a major opportunity to address broader environmental issues but most especially a unique opportunity to also contribute to nature recovery in Belfast.</p>	<p>Comment noted. The Department will continue to engage with key stakeholders as schemes are developed through the Catchment Delivery Plan process.</p>
	<p>The document makes reference to mainly Council owned green space along with some other public owned green space e.g. Colin Glen. It is important that all other public and private owned green spaces are also considered.</p>	<p>Comment noted. The Catchment Delivery Plan process will facilitate joined-up working among key stakeholders and delivery partners.</p>
	<p>Recommend that each proposal is assessed on a case by case basis at a site level, providing solutions for local areas, making sure that physical delivery is carefully designed and planned, taking account of the following key areas: Meaningful engagement with local communities including park users, local residents and stakeholders e.g. sports clubs; Open space typology and functionality - ensuring a balance of local needs. The step change' to blue/green infrastructure development will require an integrated and holistic approach from a wide range of public and private partners and stakeholders.</p>	<p>Comment noted. The Department will continue to engage with key stakeholders, including the local community, as schemes are developed through the Catchment Delivery Plan process.</p>
	<p>Education and attitudinal change needed to secure "buy in" from private and public landowners. The role of community organisations, young people and schools will be important in promoting civic responsibility in the face of the challenges</p>	<p>The Department acknowledges the need to continue education and public awareness campaigns and this is recognised in Chapter 6 of the Plan (Section 3).</p>

Respondent	Comment	Department's Response
	of climate change and the need for a new way of managing water.	
	The CCGP approach can be a key influencer with other communities as the Strategic Infrastructure Programme is developed.	Comment noted. The Department has and will continue to use other examples of best practice in delivering the Plan.
	Catchment approach - Soil and land management are key areas that should be addressed at the catchment level including enhancing soil structure, soil compaction and supporting sustainable agricultural practices to deliver broader ecosystem services.	Comment noted. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process.
	Believe the opportunities for integrated drainage measures in IDIP1 have been explored quite thoroughly and in an integrated manner – from upstream to downstream.	Comment noted.
	In the Glenmachan catchment area, it should be noted that Ashton Park and Ardmore are also streets which are subject to wastewater and sewerage flooding during heavy downfalls,	Comment noted. This has been included in the Pressures / Issues for the Glenmachan catchment on page 86 of the plan.
	The matter of blocked private watercourses and blocked unadopted watercourses presents a major problem for many residents and these pressures need to be addressed.	Comment noted. Flooding issues relating to private drainage infrastructure will be considered as part of the Catchment Delivery Plan process.
	The opportunity of opening up culverts would be a very interesting and innovative one which could also be enhanced as part of the green blue infrastructure and promote biodiversity and good health and well being.	Welcome support for the approach. Each scheme will be revisited and fully consulted on at the next stage of the Plan as part of the Catchment Delivery Plan process.
	Further opportunities in IDIP1: A SUDS scheme at Distillery street would be recommended.	Comment noted. Distillery Street is now included in the Plan as a SuDS pilot project.

Respondent	Comment	Department's Response
Belfast City Council	<p>Whilst NI Water have indicated (para 4.18, pg 51) that without investment it may have to refuse new connections and that negative planning consultation responses may have to be provided it should be recognised that there is a criteria based assessment process under which new connections can be assessed to take account of past and extant consents. It is therefore considered that there is scope to avoid this scenario and it is vital that this is articulated in the document as a caveat alongside with the recognition that negative responses would absolutely only be as last resort. Innovation and local solutions should also be pursued where possible.</p>	<p>The Plan has been amended to recognise opportunities to allow development to proceed where possible. Paragraph 4.18 has been updated to reflect the approach being taken to try and facilitate development in the short term.</p>
	<p>Funding allocations to the sewerage system for Belfast should be commensurate with the current problems created by under investment to ensure that the city can play its full role as regional driver for the economy of NI.</p>	<p>The Department welcomes the support for funding the Plan. Funding for the Plan will, however, be subject to the normal budgetary approval processes.</p>
	<p>Timeframes suggest could potentially be a window within which there will be an increased possibility of negative consultation responses to planning applications. However, following discussions with NI Water and further clarification it is understood they are actively working to avoid this scenario through the consideration and development of a range of mitigation measures including: separation of storm and wastewater in new developments (to reduce the 'load' generated); increases in on-site storm water storage and SuDS to reduce impact during high levels of rainfall (where pressure on the system is at its highest); recognising and taking account of the existing permitted development and discounting it from proposed new developments; extensive pre-engagement with developers prior to applications being submitted; accepting the potential for like for like development; and utilising conditions/ informatives on consents highlighting that connection is not likely until 2023 or after. The SDIP must reflect this potential mitigation and the proactive approach that can be brought forward in collaboration with BCC as the planning authority.</p>	<p>The Plan has been amended to recognise opportunities to allow development to proceed where possible. Paragraph 4.18 has been updated to reflect the approach being taken to try and facilitate development in the short term.</p>

Respondent	Comment	Department's Response
	<p>As ambition to deliver the Plan is challenging, it is considered imperative that there should be clear prioritised investment for the LWWP elements that can be delivered in a phased manner should there be an inability to confirm the full capital allocation - addressing what the priorities are to support continued growth of economy and short-term constraints.</p>	<p>Priorities will be developed through the proposed Catchment Delivery Plan process. Section 4 of the Plan has been updated to explain the Catchment Delivery Plan process</p>
	<p>Recognise the partnership approach required, and will continue to work with the LWW team NI Water & key stakeholders. Urge DfI to continue this partnership approach through the planning & implementation stages. Also recognise a number of other key partners in the city who own substantial land, who will also be integral to success (NI Housing Exec., Education Authority, National Trust). BCC also highlight engagement with private landowners when looking at options.</p>	<p>Welcome support for the partnership approach. The Department will continue to engage with key stakeholders, including BCC, as schemes are developed through the Catchment Delivery Plan process.</p>
	<p>Until the LWWP is fully implemented, existing partnership engagement remains critical to plan, respond and recover from the flooding risks which are faced by the City, e.g. BCC's Emergency Plan, Belfast Emergency Preparedness Group (Multi-agency Partners) and the Regional Community Resilience Group (Multi-agency Group focused on promoting and supporting resilient communities).</p>	<p>Agreed. Stakeholder and community engagement will be a key element of the Catchment Delivery Plan process.</p>
	<p>In order to implement the LWWP and integrated plan huge emphasis must be placed on delivering a collaborative approach by all partner agencies.</p>	<p>The Catchment Delivery Plan process will facilitate joined-up working among key stakeholders and delivery partners.</p>

Respondent	Comment	Department's Response
	<p>Note that many of the proposed projects within the consultation impact on BCC asset. BCC are working closely with DfI on a number of pilot projects and will play a key role in delivery moving forwards. To enable success, BCC urge that projects are co-designed with early input from specialists and planned with partners and stakeholders, taking account of below key areas: Meaningful engagement with local communities including park users, local residents and stakeholders e.g. sports clubs; Understand current site usage, feasibility and commerciality; Open space typology, functionality and ensuring a balance of local needs; Existing natural environment including current ecosystem services benefits and constraints such as Invasive Alien Species (IAS); Current and future management and maintenance requirements and costs. Depending on proposals this could include the need for new machinery, additional staff resources and management of increased invasive species; Early ecological input is required to maximise opportunities. We encourage the implementation of natural flood management (NFM) that protects, restores and mimics the natural functioning of rivers and the coastal ecosystems.</p>	<p>Opportunity-based solutions proposed in the Plan are strategic level ideas that have been developed to support the strategic planning of the LWWP. Further opportunity sites will be identified as work on the integrated drainage modelling progresses. Landowners, including BCC, will be engaged with early in the scheme development process as part of the Catchment Delivery Plans.</p>
	<p>Paucity of open water in Belfast as many rivers and streams were culverted; use of NFM will enable the restoration and creation of riverine and coastal habitats which are key priorities to address biodiversity loss. LWWP provides a major opportunity to address broader environmental issues but most especially a unique opportunity to also contribute to nature recovery in Belfast.</p>	<p>Comment noted and welcomed. The Department will continue to engage with key stakeholders as schemes are developed through the Catchment Delivery Plan process.</p>

Respondent	Comment	Department's Response
	<p>LWWP makes reference to mainly BCC owned green space along with some other public owned green space e.g. Colin Glen and Stormont; feel it is important that all other public and private owned green spaces are also considered. Recommend that each proposal is assessed on a case by case basis at a site level, providing solutions for local areas, making sure that physical delivery is carefully designed and planned, taking account of the below key areas: Early Council input to influence and shape the opportunities and proposals across the Council sites identified and a flexible iterative approach in conjunction with users; Meaningful engagement with local communities including park users, local residents and stakeholders e.g. sports clubs; Current site usage, feasibility and commerciality; Open space typology and functionality - ensuring a balance of local needs; Existing natural environment including current ecosystem services benefits and constraints such as Invasive Alien Species (IAS); Appropriate financial impact assessments carried out to identify and agree current and future management and maintenance arrangements and budgets put in place to support this prior to development. Depending on proposals this could include the need for new machinery, additional staff resources and management of increased invasive species.</p>	<p>Comment noted. BCC is obviously a key player in the Plan but the Department will seek out all opportunities to use green spaces for NFM and SuDS. The Catchment Delivery Plan process will facilitate joined-up working among key stakeholders and delivery partners on a case by case basis at project/local level to ensure community buy-in. Further opportunity sites will be identified as work on the integrated drainage modelling progresses. Landowners, including BCC, will be engaged with early in the scheme development process.</p>
	<p>CCG has demonstrated the success of an approach in terms of the use of urban green areas to prevent flooding.</p>	<p>Comment noted. Other examples of best practice will be used to inform the LWWP.</p>
	<p>The Council is already working closely with the LWW on a number of projects across the city including pilot projects at Belfast Castle, Ballysillan Playing Fields and the new Forth Meadow Community Greenway project and would welcome the opportunity to work closely with the LWW Team on identifying other projects in the city which could present opportunities for joint working.</p>	<p>Comment noted and welcomed. The Department will continue to engage with key stakeholders, including BCC, to identify new opportunities and projects that can be developed through the Catchment Delivery Plan process.</p>

Respondent	Comment	Department's Response
	<p>Note that the Newtownbreda WwTW is missing from the plan and there are significant residential developments in the Newtownbreda area and Saintfield Road, which are currently under construction. Although this is not part of Belfast's City Council's LGD as it forms part of Lisburn and Castlereagh City Council, the outfall of the WwTW is just upstream of the Stranmillis Weir and it serves a major urban area with the Belfast Metropolitan Area. We ask that consideration is given to including the Newtonbreda WwTW in the programme.</p>	<p>Scope of the Plan has been set in relation to the drainage and wastewater networks that feed into the WwTW that discharge directly into Belfast Lough. Happy to discuss Newtownbreda WwTW separately with BCC.</p>
	<p>In relation to the pressures, issues and objectives BCC would be keen to see the detail including the process and data sets used to identify these. We also found it difficult to comment on specific issues, pressures and objectives due to the limited detail, data and information provided.</p>	<p>The Plan contains strategic level information and detailed supporting data is available. LWWP officials happy to liaise with BCC in relation to specific pressures, issues and objectives.</p>
	<p>Key issue/constraint: Limited reference to invasive alien species (IAS), erosion, aquatic alien invasive species, water quality issues and tidal surge mentioned throughout the study areas;</p>	<p>The Plan contains strategic level information. LWWP will liaise with BCC in relation to specific pressures, issues and objectives.</p>
	<p>Key issue/constraint: The need for meaningful engagement/ involvement of all partners, stakeholders and users at very early stage of design and also throughout physical delivery;</p>	<p>The Department will continue to engage with key stakeholders, including BCC, as schemes are developed through the Catchment Delivery Plan process (including scoping and feasibility studies).</p>
	<p>Key issue/constraint: All open spaces have a typology and functionality and offer something for all users – need to balance this very carefully in terms of scale and impact within design proposals;</p>	<p>The need to balance the requirements of all stakeholders and users of open spaces will be a key consideration for all projects within the Plan and CDPs.</p>
	<p>Key issue/constraint: Risk implications for people living near or at waterbodies</p>	<p>Health and safety is paramount in the design and construction of all NFM/SuDS schemes. This will be a key element of the development of the Catchment Delivery Plans.</p>
	<p>Key issue/constraint: Potential long term financial implications and pressures (i.e. management and maintenance budgets) of the proposals for Council and ultimately the rate payers of Belfast</p>	<p>The future management and maintenance of NFM/SuDS schemes will have to be considered as part of the Catchment Delivery Plans and will be considered on a project by project basis.</p>

Respondent	Comment	Department's Response
	<p>BCC note that many of the opportunities identified propose the use of BCC assets. BCC would however note that many of these are still conceptual and therefore welcome the opportunity to engage with the Team on these from the outset. Request that continue to take further opportunities under review as other projects are agreed across the city - either BCC led or other partner led projects.</p>	<p>The Department recognises that early and on-going engagement with BCC will be critical to confirm the use of all BCC assets under consideration. This will be through the Catchment Delivery Plan process. All opportunities remain conceptual at this stage.</p>
	<p>Recommend that the following key principles are considered prior to the development and delivery of proposals within Council sites: Consultation and engagement with local communities and users at the local level – to ensure buy-in; Early Council input to influence and shape the opportunities and proposals across the Council sites identified and a flexible iterative approach in conjunction with users; and Appropriate financial impact assessments carried out to identify future management and maintenance arrangements agreed and budgets in place to support this prior to development.</p>	<p>The Department recognises that community engagement and consultation is critical to the successful delivery of the Plan. BCC will be an integral part of the catchment Delivery Plan teams.</p>
	<p>BCC would urge that any new developments should be required to meet certain standards to ensure no flooding issues would arise, similar to greenfield runoff.</p>	<p>Department recognises the need for clear SuDS policy and key stakeholders will be consulted with as this policy is developed; this is reflected in Chapter 6 of the Plan.</p>
	<p>BCC would welcome inclusion of a potential SUDs scheme at Distillery Street. BCC already working with a range of statutory partners in bringing forwards proposals for an underused piece of land at the bottom of Distillery Street including LWW. This provides an opportunity to build on the works already underway as part of the Forth Meadow Community Greenway proposals.</p>	<p>Comment noted. Distillery Street is now included in the Plan as a SuDS pilot project.</p>
	<p>Within IDIP3, the North Foreshore/ Giant's park isn't mentioned, which is one of the biggest open spaces in the city, with potential for opportunities i.e. water attenuation and habitat enhancement. BCC would be keen to work in partnership to identify additional opportunities for habitat restoration, access and recreation potential. BCC request</p>	<p>The Department welcomes new opportunities which will be considered and consulted on as part of the Catchment Delivery Plan process referred to in Chapter 13 of the Plan.</p>

Respondent	Comment	Department's Response
	<p>that the North Foreshore is included and would welcome an opportunity to discuss this in greater detail with the Team.</p>	
	<p>BCC believes that a funding model is pivotal to the success of the LWWP, as nothing can be delivered without a fully funded financial model that is agreed by the NI Executive. Given the urgency of the situation, this must be agreed from the 2021 financial year.</p>	<p>The Department welcomes the support for funding the Plan. Funding for the Plan will, however, be subject to the normal budgetary approval processes.</p>
	<p>In relation to the catchment areas, we would also recommend that a detailed financial impact assessment of each area is carried out as part of the finance and delivery section of the plan. This will identify future management and maintenance arrangements that need to be put in place, as a result of the proposals and appropriate budgets to be established to support this prior to development. Depending on detailed proposals additional costs for Council will include the need for new machinery, management of IAS, additional staffing and resources and capacity building, to name but a few. These costs must be considered as part of the overall financial model.</p>	<p>Comment noted. The Department will continue to engage with key stakeholders, including BCC, as schemes are developed through the Catchment Delivery Plan process (including scoping and feasibility studies). Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.</p>
CBI NI	<p>Welcome and agree with the DfI's view that water is an essential part of our daily lives, and it is in the interests of both business and households that we find, and promptly deliver, solutions to the challenges and opportunities that water presents including growing the economy, developing flood defences and protecting the environment.</p>	<p>Department welcomes CBI's support for the Plan.</p>
	<p>Acknowledge and welcome the agreed position of the Executive Parties that improving wastewater treatment is a priority, as articulated in New Decade New Approach1 (January 2020) and note the specific reference to the Living with Water Programme within that agreement.</p>	<p>Comment noted.</p>

Respondent	Comment	Department's Response
	<p>The LWWP is welcome as a means of addressing some of the current barriers to the delivery of sustainable infrastructure. Barriers to delivery are a particularly acute concern of the CBI NI members as the post COVID recovery gets underway.</p>	<p>Comment noted.</p>
	<p>In shaping our local recovery there is a unique opportunity to invest in a low carbon future and to transition to a fairer, more regionally balanced, inclusive and sustainable economy. Investing now in infrastructure can create jobs and enable economic growth at a time of challenge. Delivery of the LWWP therefore serves to play a key role in the economic recovery and growth of Belfast City and the Greater Belfast areas.</p>	<p>Comment noted and welcome the view that the Plan will act as a catalyst for economic recovery.</p>
	<p>Members felt that there was an urgent need to tackle negative responses to planning applications for new developments in Belfast that were directly connected to the wastewater capacity issue. Whilst the Programme Delivery Plan was welcome, the fact that it covers a 12 year horizon out to 2033 (running over two price control periods) was somewhat concerning, if projects targeting system capacity were not delivered during the early years of the Programme.</p>	<p>Comment noted. Paragraph 4.17 of the final plan details how NI Water will work with developers to facilitate their plans where possible until the necessary sewerage infrastructure improvement works undertaken.</p>
	<p>Properties at risk from flooding will continue to rise at an unsustainable rate without appropriate investment in design of exceedance infrastructure. This risks attraction of new & repeat foreign direct investment to Belfast. Importance of understanding climate-related risk to investment.</p>	<p>Comment noted. Any final scheme proposals will be informed by detailed integrated drainage modelling, integrated environmental modelling and drainage area planning to ensure optimum solutions are implemented.</p>
	<p>Need for education on flood risk & coastal change, so that households (and schools) and business can be empowered to take action to mitigate the risks - this needs to be taken back to a "hearts & minds" issue and communicated with transparent data, and deliverable solutions.</p>	<p>The Department acknowledges the need to continue education and public awareness campaigns and this is recognised in Chapter 6 of the Plan (Section 3).</p>

Respondent	Comment	Department's Response
	<p>Delivery of the Programme is contingent on funding. PC15 started with constrained funding of £990m against a £1.7bn requirement, and the Department has not been able to fully fund this plan. Looking to the next cycle, PC21 (6 years to March 2027), for which £0.5bn is required for this Programme alone, Working Group members have very real and substantive concerns about delivery due to continued underfunding for wastewater assets</p>	<p>The Department welcomes the support for funding the Plan. Funding for the first year of the Plan has been secured. However, funding for the subsequent years will be subject to the normal budgetary approval processes.</p>
	<p>NI Water has no certainty of multi-year funding. Furthermore, NIW's governance structure as a Government Owned Company and a Non-Departmental Public Body (NDPB), mean NIW is exposed to government cuts to annual public expenditure, and also does not have the vires to borrow from sources beyond the Department. This is not a sustainable funding model.</p>	<p>Comment noted.</p>
	<p>Although various proven infrastructure funding models for regulated utilities exist across the UK, Ireland and beyond, it is somewhat disappointing that a workable and sustainable solution for Northern Ireland has not yet been agreed. Alternative options must again be considered, particularly when comparisons are made with other devolved administrations, e.g. no Government subsidy is provided to Welsh Water for water charges. It has access to bond financing from capital markets. It also has a predictable, guaranteed revenue stream, which provides much flexibility and choice than currently available in Northern Ireland.</p>	<p>Comment noted.</p>