

Draft Social and Environmental Guidance for Water and Sewerage Services (2021-27)

Comments by

Northern Ireland Environment Link

20th December 2019

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 65 Full Members represent over 100,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be happy to do so.

Northern Ireland Environment Link
89 Loopland Drive
Belfast
BT6 9DW
P: 028 9045 5770
E: info@nienvironmentlink.org
W: www.nienvironmentlink.org

Northern Ireland Environment Link is a Company limited by guarantee NI034988 and registered with The Charity Commission for Northern Ireland NIC10107

NIEL welcomes the opportunity to engage with the Department on the Draft Social and Environmental Guidance for Water and Sewerage Services (2021-27).

1. Introduction (pg.1)

Under paragraphs 1.2 and 1.3, the Department has stated that in “the absence of Ministers and an Executive” guidance has been developed to “reflect current policies and legislative commitments”. NIEL is concerned that the absence of the NI Assembly is preventing progress (and flexibility) in the delivery of Water and Sewerage Services.

Northern Ireland has already signed up to international commitments on the “sustainable management of water and sanitation” under the UN Sustainable Development Goals, (SDG6 and SDG12 are of particular relevance) as well as the EU Directives on water. Therefore, the Department has both the mandate and the legal obligation to act on improving the water and sewerage regime in Northern Ireland – with or without the presence of a standing Assembly.

Whilst we welcome the pledge to “*promote a sustainable industry*” at “*a minimum*”, NIEL believes that it is firmly within the public interest to *actively progress* the sustainable water management agenda in order to conserve water, protect our environment and provide cost-savings to the public purse. This may involve investment in natural solutions e.g. SuDs, ICW as well as renewable energy and grey-water systems which will offer considerable savings in the long-term.

Sustainable Water (pg.2)

As referenced in paragraph 1.4, NIEL supports the Long Term Water Strategy for NI, which maps out the sustainable management of our water environment to 2039 in order to deliver the European Commission’s 2012 Blueprint to Safeguard Europe’s Water Resources. NIEL calls for the appropriate resourcing and full implementation of the Long Term Water Strategy, including improvements to drinking water supply and demand, flood risk management and drainage, environmental protection and improvement, and water and sewerage services.

Programme for Government (pg.3)

NIEL agrees with the PfG outcomes included within the guidance document.

Funding arrangements (pg.6)

The delivery of clean and safe water to NI households and businesses is one of the most important functions of NI Water and should be resourced appropriately. NIEL believes that our water infrastructure is in dire need of investment – to address the threat posed by climate change, to meet rising demand whilst ensuring that water is obtained efficiently, sustainably and with minimal impact upon our freshwater environment.

Given that the Department admits that a budget for 2021-27 set at PC15 levels will have a “*significant detrimental impact on the economy, the environment and the wellbeing of citizens*”, it may be deemed to be within the public interest to consider alternative funding arrangements to ensure continuity of water supply and provide adequate investment in our water infrastructure.

NI Water has stated that it requires investment of £2.5bn¹ over the next business plan period PC21. As yet, “*a solution has not been identified*” to fund this vital investment. Whilst efficiencies and creativity may offer some relief to budgetary pressures, serious consideration should be given to the introduction of metered water charges for domestic properties (as in the rest of the UK) as a means to raise revenue.

Living with Water Programme (pg.7)

NIEL supports the continuation of the Living with Water Programme and the interdepartmental approach to flooding and protecting our environment.

Under paragraph 1.16, reference is made to the £790m required for investment in NI Water’s wastewater networks and treatment facilities during PC21. “*Alternative solutions*” should

¹ <https://www.niwater.com/ourstrategy>

consider SuDs and ICW – both of these are cost-effective solutions that have been trialled successfully at Carrowreagh and Stoneyford respectively.

Resource DEL (pg.10)

NIEL would encourage further investment in renewable energy to help reduce costs over the PC21 period and beyond. This will help to reduce NI Water's carbon footprint and guarantee the security of NI Water's energy supply into the future.

NI Water is the largest user of electricity in Northern Ireland. Currently only 13% of NI Water's electricity demand is met by renewable sources. Whilst we welcome recent efforts to increase the uptake of renewable energy (e.g. Dunore Solar farm), considerable improvements need to be made if NI Water is to meet its target of 40% by 2020.

Beyond 2020, NIEL would encourage NI Water to progress its "Towards Zero Carbon" agenda² so that the provision of water in Northern Ireland is carbon-neutral by 2050 – this would align with the UK's 2050 net zero carbon target.

Metering (pg.10)

NIEL believes that the issues of metered water pricing and managing water consumption are closely related, where the former can be used as a control on the latter. Whilst there are no plans to introduce domestic metering "*until at least 31st March 2022*", NIEL would maintain that the principle of paying for a service leads to greater valuing of that service. To foster a positive public attitude towards our precious water resources in NI, we recommend that metered water charging for domestic properties is rolled out as soon as possible.

Sustainable Water Management (pg.11)

The Department should seek to avoid the creation of new and costly "hard infrastructure" where possible and investigate options for natural solutions to water management.

² <https://www.niwater.com/towards-zero-carbon>

NIEL would encourage investment in “soft infrastructure” (e.g. SuDs) as a cost-effective option to reduce the volume of water entering our sewerage systems – and therefore reduce expenditure on water treatment. SuDs should be considered at the beginning of the design stage of any development. In light of sewerage capacity issues, new connections to the existing sewerage system should be discouraged.

The Department should also seek to promote tree-planting and greening of urban areas to help address the volume of surface runoff and lessen the impact of flooding. Collaboration with local councils and NI Water will be vital to delivering significant, strategic, catchment-level change.

Integrated Constructed Wetlands (ICW) hold considerable potential to reduce the volume of waste water requiring active treatment. ICWs operate as “passive”, low-maintenance systems which can regulate water through natural means. NI Water has already successfully trialled ICW at Stoneyford. Investment should be provided to allow the rolling out this approach to other sites where feasible.

Digital Modernisation (pg.11)

NIEL would welcome the introduction of “digital modernisation”, particularly where this may assist in the reporting of pollution incidents and faults/leaks in the system.

Research, Development and Innovation (pg.12)

NIEL welcomes the continued support for Research Development and Innovation (RDI). NIEL agrees that RDI can assist with the delivery of efficiencies. Collaborative working with the UK and EU water industries must continue, as it will allow for information-sharing and learning on best practice.

2. Drinking Water Supply and Demand

NI Water supplies approximately 576m litres of clean drinking water to households each day³. On average each person uses approximately 150 litres a day, with an estimated 95% of water delivered to our homes going down our drains. We also now use around 70% more water than we did 40 years ago⁴. This increase in consumption, paired with a very high volume of waste is unsustainable, especially in the context of projected climate change impacts. Water scarcity has already become a concern in recent years, with prolonged dry spells having a profound effect on supply – for example, in June 2018 a hosepipe ban was imposed throughout NI following a prolonged heatwave.

Whilst addressing leakages in the system and introducing efficiencies where possible will help address issues around supply, metered water charges domestic properties (as mentioned earlier) will incentivise the reduction of waste.

3. Flood Risk Management and Drainage

The cost of flood damage in recent years⁵ has emphasised the urgent need for investment in flood prevention measures.

NI Water should consider progressing an ecosystem services approach to help reduce flood risk. By rewetting and restoring peatlands that are owned and/or managed by NI Water, this will benefit biodiversity, reduce flood risk and increase the capacity of our peatlands to sequester carbon.

NI Water should also seek to work with landowners to identify and provide space in upland areas for “sacrificial” flooding – preventing costly flood damage from occurring downstream within the urban environment.

³ <https://www.niwater.com/sitefiles/resources/pdf/reports/2019/2018niwaterdrinkingwaterqualityannualreport.pdf>

⁴ <https://www.nienvironmentlink.org/cmsfiles/policy-hub/files/documentation/Freshwater/From-Source-to-Sea.pdf>

⁵ <https://www.bbc.co.uk/news/uk-northern-ireland-foyle-west-45284509>

According to the latest UK Climate Projections (UKCP18), winters in the UK, for the most recent decade (2009-2018), have been on average 5% wetter than 1981-2010 and 12% wetter than 1961-1990. Summers in the UK have also been wetter, by 11% and 13% respectively⁶. This exacerbates the pressure placed on our sewerage systems and significantly increases the risk of flooding. Slowing the flow of water and reducing the volume of surface run-off should be a key priority for the Department. SuDs (as mentioned earlier), tree-planting and the greening of our urban spaces are considerably cheaper than “hard infrastructure” solutions to drainage.

4. Environmental Protection and Improvement

NI Water is one of the largest landowners in Northern Ireland, managing approximately 8,600 hectares of public land. A significant proportion of NI Water land has recreational value and is regularly accessed by members of the public. NIEL would welcome the ongoing maintenance of existing trails, as well as investment in the creation of new walking trails where appropriate. NI Water should seek to manage and develop outdoor recreation provision in co-operation with partners (e.g. Outdoor Recreation NI). Public right of way should be clearly delineated, with consideration given to how right of way can be maintained in the event that any parts of the NI Water estate are to be sold.

Currently, just over 30% of all river water bodies in Northern Ireland are deemed to be in “good ecological status”⁷. This presents difficulties for NI Water in obtaining sufficiently clean water for processing into drinking water. Continued collaboration with The Water Catchment Partnership will help ensure that good land management practices are maintained on sites adjoining waterbodies.

Due regard should be given to the statutory Biodiversity Duty⁸, which stipulates that public bodies must manage land in a sustainable manner for the benefit of habitat and biodiversity. Designated Sites (e.g. ASSIs) within NI Water’s estate should be brought into favourable

⁶ <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/index>

⁷ https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2019_0.pdf

⁸ <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/biodiversity-duty-guidelines-for-public-bodies-may-2016.pdf>

condition. Particular attention should be given to the protection and enhancement of European and nationally important habitats and species on land managed by NI Water.

Given the threat posed to freshwater and marine life, The Department should ensure that the unintentional release of sewage into waterways or the marine environment is prevented at all costs. Increasing capacity through the introduction of permeable pavement/green space, slowing the flow of water, separating stormwater from wastewater should all be considered as measures to reduce the threat posed by flooding – and to our environment.

Effective monitoring and investment in early detection warning systems will help to identify and remedy pollution incidents at the earliest opportunity. Furthermore, where fault can be attributed to industrial or farming activity, enforcement action should be taken under the “polluter pays” principle to deter future incidents of pollution.

We would also encourage a close working arrangement with NIEA to ensure that any development or maintenance work – carried out by DfI, NI Water or a private contractor – does not have a negative impact upon water bodies, habitats or species.

5. Water and Sewerage Services

NIEL agrees with the 5 key policies referenced in paragraph 5.3.

Improving water quality before it reaches the treatment works is one of the most cost-effective approaches to water purification. NIEL would encourage continued support for Sustainable Catchment Area Management Practice (SCaMP) to improve water quality, protect wildlife and save money that would otherwise be spent on water treatment.

NIEL welcomes the pledge to invest in resilience – weather extremes will become more frequent and more intense in the coming decades and therefore our water and sewerage systems should have sufficient capacity to cope under pressure. As mentioned earlier, the promotion of SuDs, tree-planting and greening of urban areas will help reduce the risk of flooding.

NIEL welcomes the recognition that public land holds considerable value for recreation, biodiversity and cultural heritage. Land held by the Department and NI Water should be improved for environmental benefit and made publically accessible through the provision and maintenance of walking and cycling trails. NIEL agrees that surplus land (as mentioned in paragraph 5.14) should be considered for recreational use by local communities. The collaborative approach between NI Water, local councils, Tourism NI and landscape partnerships in Newry, Mourne and Down (as mentioned in paragraph 5.13) should be promoted throughout NI.