

NI Water Draft Strategy 2021-2046

Comments by

Northern Ireland Environment Link

6th November 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 90,000 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.

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Q1. Customer – delivering an exceptional customer experience;

Do you agree with this strategic priority? Please explain your answer.

No comments.

Q2. Water – delivering great tasting, clean and safe water to meet customer need;

Do you agree with this strategic priority? Please explain your answer.

NIEL agrees with this strategic priority.

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.

NI Water supplies approximately 576m litres of clean drinking water to households each day¹. 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 ago². 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.

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. However, pricing alone will not bring about the desired reduction in water usage – there is a need for the continued education of householders in NI on the best ways to conserve water and reduce use. In particular, we would welcome social media campaigns, radio and television advertisements to help educate the public on the value of this precious resource.

¹ <https://www.niwater.com/sitefiles/resources/pdf/reports/2019/2018niwaterdrinkingwaterqualityannualreport.pdf>

² <https://www.nienvironmentlink.org/cmsfiles/policy-hub/files/documentation/Freshwater/From-Source-to-Sea.pdf>

Furthermore, education efforts should continue to address the ongoing problem of inappropriate material or substances being flushed down the toilet or poured down drains. This could help to prevent blockages in the system which can be very costly to remedy.

Q3. Economy – efficiently delivering infrastructure to underpin sustainable growth;

Do you agree with this strategic priority? Please explain your answer.

NIEL agrees in principle with this strategic priority.

NI Water should seek to avoid the creation of new and costly “hard infrastructure” where possible and investigate options for natural solutions to water management.

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 NI Water’s expenditure on water treatment. NI Water should 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 the Department for Infrastructure and local councils 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 by NI Water. ICWs operate as “passive”, low-maintenance systems which can regulate water through natural means. NI Water has already successfully trialled ICW at Stoneyford and should consider rolling out this approach to other sites where feasible.

NI Water has previously provided water butts to community groups to reduce the volume of drinking water being used for other purposes e.g. gardening. We would encourage that this approach is maintained, and that other opportunities for reducing water use e.g. grey-water systems are explored. NI Water should consider piloting grey-water systems on NI Water sites or government properties in order to set a positive example for businesses to follow.

Q4. Nature – protecting and enhancing the natural environment;

Do you agree with this strategic priority? Please explain your answer.

NIEL agrees with this strategic priority.

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 throughout the duration of the Strategy period, 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.

NI Water should give due regard to its responsibilities under the statutory Biodiversity Duty³, 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 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.

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.

Currently, just over 30% of all river water bodies in Northern Ireland are deemed to be in "good ecological status"⁴. 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. We would also encourage NI Water to work

³ <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/biodiversity-duty-guidelines-for-public-bodies-may-2016.pdf>

⁴ https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2019_0.pdf

closely with NIEA to ensure that NI Water's activities (or planned activities) do not have a negative impact upon these water bodies.

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. NIEL welcomes recent efforts to increase the uptake of renewable energy (e.g. Dunore Solar farm) and would encourage further investment in this area. This will help to reduce NI Water's carbon footprint and guarantee the security of NI Water's energy supply into the future.

Q5. People – providing a great place to work.

Do you agree with this strategic priority? Please explain your answer.

No comments.