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22 September 2025

Dear LDP Team,

**Re: Newry, Mourne and Down District Council NMDDC draft Plan Strategy (dPS)  
Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment  
(SEA) and HRA.**

Thank you for your correspondence regarding the Strategic Environmental Assessment Environmental Report in relation to the draft Plan Strategy Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) and HRA.

The Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) and (supported with a service level agreement) has considered the consultation and associated documents and our opinions are set out below.

DAERA are broadly content with the SEA assessment and largely agree with its conclusions. We are also broadly content with the draft HRA.

We welcome the acknowledgement that individual plans and projects may require further environmental assessment and will be subject to HRA and/or further SEA/environmental assessments as appropriate at project level.

DAERA SEA Team is content that the environmental report and the process of consultation follow the SEA Directive. However, while transboundary consultation on the SA has been mentioned it is not clear who has been consulted. If the consultation bodies in the Republic of Ireland (RoI) have not been consulted the responsible authority may wish to consider this given the proximity to RoI and their obligations under the EAPP.

NED note the baseline information provided, and interrelationships have been discussed within the SA and SA scoping report.

DAERA notes that the SA refers to 'All proposals must meet the General Policy and other provisions of the LDP' as part of the *Measures to reduce negative effects and promote positive effects* (presumably mitigation measures) within the *Summary of Sustainability Appraisal findings* section. For some policies this goes further e.g. COU policies (in the dPS only COU 2 mentions the potential need for other ecological surveys) which state 'SP1 and operational policies relating to design in the countryside, natural heritage (incl. biodiversity checklist / ecological survey), flood risk and drainage and the historic environment will help to avoid/reduce negative effects. Department for Infrastructure's Local Transport Study and future Local Transport Plan(s)'. We note the biodiversity checklist and ecological assessments are also highlighted as proposed measures for HOU policies and the NH policies however in the dPS reference to ecological appraisal only appears in Appendix 6 (in relation to information the council may request) and NH2 and only with regard to European Protected Species (EPS). We note that GP1 notes the requirement for ecological appraisal however there is only reference to NH2.

The SA should be consistent with the dPS and ensure that the basis of assessment is accurate i.e. provision of the biodiversity checklist, environmental/ecological assessments/appraisals may impact the conclusions of the SA, particularly the strongly positives. The fact ecological appraisal is only mentioned in relation to EPS weakens the policy overall as it may suggest that other protected/priority species or habitats do not require ecological appraisal. Ecological appraisal should be added to the nationally protected species of NH2. The policy needs to be consistent and clear on what may be required. We would suggest that reference to environmental/ecological surveys/appraisal is included for all NH policies within the policy section and that the reference to compliance with GP1 and other policies within the dPS is clearly stated for all policies. We also advise removal of the reference to NH2 after ecological appraisal with GP1. The dPS must be consistent with the SA as any inconsistency could warrant the SA invalid.

In addition, most policies have been identified as not requiring mitigation however the title 'measures to reduce negative effects and promote positives' would suggest this is proposed mitigation.

#### Natural Environment Division Comments

The NIEA Natural Environment Division (NED) works to ensure that Northern Ireland's special natural environment, including its flora and fauna and landscapes, is conserved, enhanced and managed for the benefit of this and future generations, thereby contributing to sustainable development.

A description of the current state of the environment and how this relates to the proposed Framework is included within the environmental report. Appropriate environmental objectives / targets / indicators for each of the likely environmental receptors is addressed including consideration of alternatives, an assessment of significant impact and complemented with mitigation measures and monitoring programme. Environmental assessment against the SEA topics is addressed

Most policies have been identified as not requiring mitigation, this is concerning, although some go on to discuss measures to reduce negative effects and promote positives underneath the mitigation section within the Summary of Sustainability Appraisal Findings, Chapter 3. This would appear to be a form of mitigation as it relies on the policy being subject to GP1 and all other policies which should provide some form of mitigation. In addition, the report refers to lower tier Environmental Assessments and /or HRA potentially identifying impacts and identifying mitigation. The report should contain a clear commitment to undertake such assessment (and potentially further SEA) as the plan progresses and plans emerge from it e.g. LPP and project level.

The use of the word 'should' in policy NH 5 instead of 'will' within the dPS is not consistent with the wording in the SA which bases its assessment on the wording being 'will.' Amending the dPS, to reflect what has been assessed within the SA, will make the documents consistent. The Responsible Authority must be content that the wording of the policies within the dPS aligns correctly with what has been assessed otherwise the SA would not be accurate and the conclusions would be impacted.

### HRA

NED are broadly content with the conclusions of the HRA and welcome that this will be revisited as the plan progresses and assessment will be carried out for lower tier plans/projects (including the LPP) as they emerge, including AA if appropriate. We welcome the inclusion and assessment of sites within the 15km zone of influence.

### Marine Plan Team Response

The Marine Plan Team make the following comments on the Newy, Mourne and Down District Council Local Development Plan 2035- Draft Plan Strategy Sustainability Appraisal Report (Incorporating Strategic Environmental Assessment).

### Sustainability Appraisal Report:

- This policy states 'GP1 will have a more direct role in preventing deterioration of water quality. It is now considered that this approach will have significant positive effect on Objective 10'. Should this not reference Objective 11 instead of Objective 10 as this relates to water resources?
- It is observed that while some of the policies explicitly address the impacts on both landscape and seascapes, other policies do not acknowledge the potential effects on seascapes. While the inclusion of seascapes considerations may not alter the overall assessment and its conclusion, it would have provided an opportunity to explicitly assess the potential impacts on seascapes across several of the policies. For example, Policy MIN1 - Minerals Development, Policy TCU3 - Public Services and Utilities, Policy WM1 - Waste Management Development, Policy RE1 - Renewable Energy, Policy TOU4 - Major Development in the Countryside and Policy LA1-LA3 - Landscape Assets.

### Marine Conservation Branch Response

- **Marine Protected Areas:** While the HRA process identifies and covers potential impacts and mitigation measures for European sites SACs and SPAs, it does not cover Marine Conservation Zones (MCZs) designated under the Marine Act (Northern Ireland) 2013. Strangford Lough MCZ includes sensitive marine habitats and species that may be affected by coastal development, recreational use, or pollution ([Guidance for Marine Protected Area Assessments in the NI inshore area | Department of Agriculture, Environment and Rural Affairs](#)).
- **Marine impacts and pressures:**
  - Marine-specific screening criteria for likely significant effects and potential impacts on subtidal habitats, marine mammals, and benthic communities could be developed further (beyond coastal pressures and broad environmental receptors).
  - There is limited detailed assessment of marine-specific pressures such as sedimentation and turbidity from construction or dredging, noise pollution, climate change effect on sea level rise, cumulative impacts from aquaculture, tourism, and renewable energy projects etc. These pressures are increasingly relevant for marine Ramsar sites and SACs/SPAs.
  - While mitigation is discussed generally, there is no detailed strategy for marine-specific mitigation (buffer zones, seasonal restrictions, echo moorings etc).
- **Cumulative Marine Impacts:** should be considered further across sectors and plans in the marine area (aquaculture, marine traffic, tourism, offshore renewables etc)
- **Policy integration:** The UK Marine Policy Statement (2011) and the draft Marine Plan for Northern Ireland are not prominently referenced in either the appraisal or the HRA. These documents provide spatial guidance and policy for the terrestrial-marine interface, which is crucial for integrated coastal zone management of Newry Mourne Down.
- **Seascape:** We suggest the inclusion of seascapes sensitivity, visual impacts and Seascape Character Assessments (SCAs) as a standalone topic in the appraisal.

Also, please could we ask to remove/update references to DARD throughout.

After reviewing the 'Sustainability Appraisal Scoping Report June 2025' we note that Newry, Mourne and Down District Council refer to the 'Baseline Study and Gap Analysis of Coastal Erosion Risk Management NI' Report, that was created by Amey Consulting on behalf of both DAERA and DfI in 2019. It appears as though the council are using this report to identify the risk to coastal areas.

We would, however, note that this report is out of date, the report subsequently produced by Amey Consulting clearly indicates that:

*'because of the lack of consistent and comprehensive coastal erosion baseline data in Northern Ireland, the risk ranking of assets is preliminary and by association the veracity and reliability of the vulnerability mapping is low and must be approached with a high degree of caution'*

As such the 'Baseline Study and Gap Analysis of Coastal Erosion Risk Management NI' Report recommended that:

*'consideration should be given to the establishment of a coastal erosion baseline for Northern Ireland encompassing the quantification of long-term coastal erosion through review of historic maps and photos.'*

We would therefore note that the 'Baseline Study and Gap Analysis of Coastal Erosion Risk Management NI' Report cannot be used to identify areas known to be at risk from the impacts of coastal erosion, as is required by Section 6.46 of SPPS.

### Coastal Evidence Gathering

Since 2020 DAERA has been addressing the shortfall of scientifically robust baseline data on how the Northern Ireland coastline is changing, through the Northern Ireland Coastal Forum. Based on the findings of the report detailed above, DAERA has taken the lead on coastal evidence gathering and has commissioned a range of surveys utilising multiple methodologies, ranging from LiDAR (Light Detection and Ranging) surveys of both the coast and nearshore area, the collection of high resolution orthophotography, acquisition of satellite-derived bathymetry data, and detailed analysis of Ordnance Survey maps, historical aerial photographs and geological datasets.

Furthermore, projects such as the Northern Ireland Historical Shoreline Analysis Survey and Coastal Change Information Tool have helped to identify and contextualise historical coastal change from the early 1800s to present day. With their findings helping to identify areas in Northern Ireland that have seen rapid progression of coastal erosion.

Each of the surveys commissioned by DAERA have helped to provide a solid evidence base for Northern Ireland. As further surveys are commissioned it will be possible to accurately measure and identify coastal change. To date two coastal LiDAR surveys of the entire coastline have been acquired, these results will be publicly available and will allow changes in the coastline to be calculated and identified between the 2021 and 2025 surveys.

The evidence collected by DAERA is a key resource that should be utilised by the local councils for the completion of the Local Development Plans. The evidence collected by DAERA has been made publicly available on the Northern Ireland Coastal Observatory



which was launched on Friday 20<sup>th</sup> October 2023 and can be found using the following link:

**Northern Ireland Coastal Observatory**

As detailed above, the datasets and evidence collected by DAERA since 2020 provide a key baseline that local councils can use to help identify risk for their coastal areas. It is also worth highlighting that a survey on the nearshore bathymetry is in the final stages of completion and once complete, this will be used to model hydrodynamic impact at the coast from sea level rise and extreme storm events.

In conclusion, as the current Local Development Plan 2035 Draft Plan Strategy documents do not take into account these new resources, we would note that we have concerns with these documents in their current format. We note that the '*Baseline Study and Gap Analysis of Coastal Erosion Risk Management NI*' Report is outdated and has been superseded by the data acquired by DAERA, and further analysis and evidence is needed to accurately map coastal vulnerability as required by SPPS section 6.46 to inform the LDP.

**Groundwater Team Comments**

Having reviewed the Sustainability Appraisal Report June 2025, there are appropriate considerations to the groundwater environment, in particular with regards to cemeteries, wastewater and mineral extractions. With sustainable energy also making reference to geothermal, the benefits and risk that accompany it.

**Drinking Water Inspectorate Comments**

**Habitats Regulations Assessment Report**

Under Section 3, 'Potential Impacts of Development', sub heading 'Water Supply' (page 6), we would like to add that DWI also regulate the activities of NIW. NIW are the sole provider for mains water across Northern Ireland but they are still regulated.

**Air Quality and Biodiversity Unit Comments**

- P60 – There is a (+) for Sustainability Objection 9 (Improving Air Quality) in relation to Policy ED7 (Agriculture and Forestry).
- We suggest that this should be (?), as for SOs 10-12, since emissions will be dependent on individual cases – and please note that ammonia from agriculture can contribute to negative human health outcomes through the formation of particulate matter
- Similar comment regarding assessments on pages 159 and 274.
- P61 – Note that ammonia itself is not considered as a greenhouse gas, therefore text should read, '... an increase in greenhouse gas emissions *and* ammonia...'.

Yours sincerely,



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22 September 2025

Dear LDP Team,

**Re: Newry, Mourne and Down District Council NMDDC draft Plan Strategy**

Thank you for the opportunity to comment on the Council's draft Plan Strategy (dPS).

The Department of Agriculture, Environment and Rural Affairs (DAERA) have considered the draft plan and our comments are detailed below.

**Natural Environment Division (NED) comments**

**General Comments**

NED are generally content with the policies and note they are largely consistent with existing planning policy.

**General Policy**



We welcome GP1 General Policy and the acknowledgement that the plan must be considered as a whole and developments need to accord with all the policies and plans outlined in the dPS. However, we are of the opinion that this could be strengthened by the inclusion of the statement 'All proposals must meet the General Policy and other provisions of the LDP' within most of the policy boxes as appropriate. We note this is included for some policies e.g. policy WM1 and TCU1 and are of the opinion it should be included similarly in all policies. If this is not possible then we would be of the opinion that Natural Heritage protection and biodiversity enhancement are included in all relevant policies. The recognition of Historic and Natural Environment within the policy GP1 is noted, particularly the integration of biodiversity into design.

We welcome the recognition of potential impacts from light on wildlife within the Justification and amplification (J&A) of GP1. It may be worth noting this in other policies that may involve lighting e.g. advertisements, open space.

We would suggest that reference to environmental / ecological surveys / appraisal is included for all NH policies within the policy section and that the reference to compliance with GP1 and other policies within the dPS is clearly stated for all policies. We also advise removal of the reference to NH2 after ecological appraisal with GP1 as this implies that only NH2 requires ecological appraisal.

We welcome the integration of sustainable development throughout the plan. We note that biodiversity has been mentioned within policy ENV2 however, we would strongly support incorporation of biodiversity considerations into other policies. This would ensure that biodiversity is encouraged and embedded as part of the development process. Where relevant, policies should be clear on requirements with regard to potential environmental assessments, mitigation and enhancement of biodiversity. Alternatively, this could be integrated into a general or strategic policy

Consideration should be given to ecological surveys in relation to protected / priority species and habitats in both rural and urban settings. Many urban buildings support swifts and bats and this should be a consideration in urban applications. Rural developments particularly refurbishment, replacement dwelling or industrial developments can have an impact on natural heritage features. Not only by potentially destroying habitat or resting places but by disturbance as increased activity / lighting may have an impact on wildlife species e.g. bats. Thorough ecological surveys need to be undertaken with protection afforded to these buildings.

### Spatial Growth Strategy and Strategic Policies

NED welcome SP1, such developments should be mindful of the council's Biodiversity duty and the requirements on Natural Heritage policies. We welcome the sustainable

placing of development and the recognition of climate change requirements within developments, including improving energy efficiency in design and the installation of renewable energy sources in new and retrofitted buildings.

NED are disappointed that the previous SP2 General Development Management Policy within the previous consultations has been removed, again we would be keen to see this reinstated and are of the opinion that the plan would benefit from the clarity this policy provided to ensuring compliance with all the operational policies. In addition, this policy provided clarity on requirement for developers to provide relevant impact assessments which also consider mitigation in relation to this policy. We would draw your attention to our previous comments on this particular policy (Letter dated 30 June 2023). While these requirements are outlined in some of the relevant policies it would be helpful to see it within this section of the plan.

We welcome policy SP2 Enhancing Design and Place Shaping and the encouragement of 'greening' and native species planting to enhance biodiversity. We would welcome further enhancement opportunities for enhancing biodiversity where possible. Additionally, consideration should be given to the design and development of new builds, renovations or any building to ensure they are wildlife friendly e.g. incorporate swift bricks, bat boxes.

We welcome policy SP3 Developer Contributions and Agreements particularly given this extends to restoration (renewables, waste and mineral developments), open spaces, biodiversity net gain and enhancement, blue and green infrastructure and is included in the main policy section.

NED welcome the promotion of sustainable tourism. However, the policies may benefit from more specific reference to biodiversity enhancement and natural heritage protection / conservation.

We welcome Strategic policies EVS 1 and 2, and the recognition of the council's obligations under the Wildlife and Natural Environment Act (NI) 2011(WANE).

### Housing

The J&A of HOU 2 could be strengthened to make this a requirement and include integration of biodiversity into design. While it suggests appraisal of features including Natural Heritage in the production of design concept statements (we note this is mentioned in some of the other HOU policies and GP1) strengthening would make the plan clearer. We welcome the recognition of the biodiversity value of such integration, and it is worth noting the contribution integration and enhancement of biodiversity in housing schemes can contribute to the Council's biodiversity duty under the WANE (NI) Act 2011. Where it is not mentioned within the policies or J&A biodiversity enhancement / integration and natural heritage conservation should be included.

### Development in the Countryside

We note that COU9, which applies to all development in the countryside, mentions the importance of landscaping for integrating development into the countryside and enhancing biodiversity. All policies relating to development in the countryside should be mindful of the intrinsic links with wildlife and natural heritage. All new development in the countryside needs to be mindful of the potential impacts on natural heritage e.g. replacement dwellings that require demolition may be resting places for wildlife e.g. bats and birds. In addition, new developments e.g. new builds and industrial developments, have the potential to disturb wildlife through development, increased activity, and lighting.

### Open Space, Recreation, and Sport

We welcome the recognition and the protection from adverse impacts for features of nature conservation importance and biodiversity running through these policies. We welcome the promotion of biodiversity and habitat connectivity through blue and green infrastructure (policy OS8) which can benefit the public and wildlife. Again, it is worth noting the value that open spaces and green and blue infrastructure can offer in terms of biodiversity and in the Council's biodiversity duty obligations under the WANE Act 2011 by creating and enhancing habitats for wildlife.

### Mineral Development

NED welcome the inclusion of the statement 'All proposals must meet the General Policy and other provisions of the LDP' at the beginning of the economic chapter of which minerals is one element. We would be keen to see this in all policy boxes as applicable.

NED welcome the Policy on Peat Extraction MIN6 and the clarification on what is considered not reasonably capable of restoration provided with the MIN6 J&A. NED welcome MIN 6 and the securing of restoration and aftercare for mineral sites.

### Advertisements

NED advise that inappropriate placing of advertisements could have effects on natural heritage e.g. on buildings which may obstruct access to species. In addition, advertisements with lighting may disturb wildlife e.g. emergence of bats.

### Natural Heritage

NED are content that the policies are broadly consistent with the SPPS and PPS2, however we raise a few issues below. We welcome the additional policies with regard to Landscape, SLNCIs and the Protection of Main River Corridors and Open Water Bodies.

However, while we welcome the requirement for developers to provide relevant Ecological appraisal / assessments / surveys for European Protected species, this should be extended to all protected species within this policy and all NH policies as it implies other protected / priority species and habitats do not require any ecological appraisal / assessment. This is likely to impact not only the clarity of the plan but also the soundness of the plan particularly with consistency. We welcome in relation to NH2 that the requirements of protected species present must be factored into design and full consideration of the impacts given prior to determination.

The use of the word 'should' in NH5 not only weakens the policy but is not consistent with PPS. This should be changed to 'will' as it could affect the soundness of the plan, with regards to the consistency tests.

The policies should be clear and include a statement that in determining potential adverse impacts from any plan or project, relevant environmental assessments must be carried out.

We would suggest that reference to environmental / ecological surveys / appraisal is included for all NH policies within the policy section and that the reference to compliance with GP1 and other policies within the DPS is clearly stated for all policies. We also advise removal of the reference to NH2 after ecological appraisal with GP1 as it implies only NH2 requires provision of surveys, it should refer to all Natural Heritage policies for consistency and soundness.

### **Marine Licensing Response**

Marine Licensing Branch have no comment to make at this stage. As the Regulatory Authority we will only comment on individual projects and on a case-by-case basis.

### **Marine Strategy Response**

Overall, we are content with inclusion of Marine Strategy, Shellfish Waters and Bathing Waters policies.

To note, with specific reference to Sustainability Appraisal scoping Report:

1. 2014 Shellfish Pollution Prevention Programmes updated to Shellfish Action Plans in 2019.
2. The shellfish waters compliance figure stops at 2020 and the Environmental Statistics report has published up to 2024 (<https://www.daera-ni.gov.uk/publications/northern-ireland-environmental-statistics-report-2025>)
3. The current Nutrients Action Plan Regs referred to as the Nitrates Action Plan.

### **Coastal Geomorphology Team Response**

After assessing the documents provided, we would note that we have concerns with the Local Development Plan Draft Plan Strategy that has been created.

#### **Strategic Planning Policy Statement**

The Strategic Planning Policy Statement (SPPS) which is a key policy for Northern Ireland must be taken into account in the preparation of Local Development Plans (LDPs). The Regional Strategic Policy section specifically states that '*Development will not be permitted in areas of the coast known to be at risk from flooding (see Flood Risk), coastal erosion, or land instability.*'

As such section 6.46 of SPPS explicitly states that Local Development Plans '*should identify areas of the coast known to be at risk from flooding, coastal erosion, or land instability where new development should not be permitted.*'

We note that the strategy documents supplied by Newry, Mourne and Down District Council for their Local Development Plan 2035 do not fulfil the requirement set out in Section 6.46 of SPPS.

### **Marine Plan Team Response**

#### **Draft Plan Strategy:**

##### GP1 General Policy:

- Page 163 – It is recommended that the following statement found in the J&A of GP1 General Policy is removed 'It should be noted that the Council's planning jurisdiction only extends to the mean low water mark'. Council has a legal obligation to consider seascape; therefore, it is suggested that this statement is removed, as it is misleading.

##### Impact Assessments:

- Page 165 – Although the Impact Assessment list is not exhaustive, there is an opportunity to undertaking a Seascape Impact Assessment and a Marine Impact Assessment. Undertaking a Marine Impact Assessment will ensure the relevant marine policies are given consideration in assessing proposals.

##### Marine Legislative Requirements:

- Page 165 – It is advised the word 'district' is removed from the last paragraph. Marine legislation such as the Marine Act (Northern Ireland) 2013 and the Marine and Coastal Access Act (2009) do not refer to the district's marine area, it is just the marine area.
- It is also advised the last sentence is amended from 'draft Marine Plan for Northern Ireland' to 'any Marine Plan for Northern Ireland'. This will future proof the Council's Plan Strategy.
- It would be beneficial if the Marine Legislative Requirements section (as amended) is included with the GP1 General Policy text on page 158. The statement is lost in the J&A and its reiteration up front would highlight the importance of ensuring proposals meet marine legislative and policy requirements.

##### Policy C01- The Undeveloped Coast:



- It is observed that Policy C01- The Undeveloped Coast and Policy DAR1- Development at Risk from Land Instability or Coastal Erosion do not include reference to the UK Marine Policy Statement or the Marine Plan for Northern Ireland. Consequently, this highlights the importance of ensuring the section on Marine Legislative Requirements is reiterated on the first page of the GP1 General Policy (page 158).

**General Comment**

- It is noted many of the individual policies refer to landscape, yet seascape could also be consideration and could be more explicitly referred to, especially as GP1 General Policy includes seascape as a consideration.
- Some policies state that 'all proposals must meet the General Policy and other provisions of the LDP'. However, other policies do not refer to the GP1 General Policy. Is this an oversight? It is imperative that reference to GP1 General Policy is either: a) included in all policies or b) included in the GP1 General Policy text and removed from individual policies. It is important to ensure consistency in the policies.

**Water Management Unit Comments**

In the document [Technical Supplement 2 – Housing](#), Water Management Unit would highlight that future development should not create or exacerbate environmental pollution or damage. Water Framework Directive (WFD) Objectives for waterbodies in the plan area are currently not being met. The identification of further development land/housing should therefore also acknowledge the need for adequate wastewater treatment infrastructure and treatment capability. Given that such infrastructure in the Plan area is already under pressure combined with WFD Objectives not currently being met for a number of waterbodies in the LDP area, any further development/housing before infrastructure has been put in place or upgraded will exacerbate the difficulties in achieving the WFD Objectives. The zoning of land and the timing of the release of that land for development should be aligned with the availability of suitable waste water networks and treatment infrastructure to service the developments to ensure there is adequate protection for the water environment.

Water Management Unit welcomes the use of Sustainable Drainage (SuDS).

**Drinking Water Inspectorate Comments**

**Draft Plan Strategy**

Under Policy HOU1 Quality in Residential Development, sub heading 'Public and Private Water Supplies' (page 172), we think it would be beneficial to clarify that Private Water Supplies are regulated and monitored by the Drinking Water Inspectorate, and it is not a responsibility of NI Water

Yours sincerely,



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