

15 May 2024



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District Council

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Reference: Water Resource and Supply Resilience Plan 2024

To whom it may concern:

Mid Ulster District Council would like to take this opportunity to provide comments on DfI Water Resource and Supply Resilience Plan 2024.

Mid Ulster District Council agrees that increased planning from 25 years to 50 years, which is intended to try to take account of future longer term climate change impacts and demographic changes, is to be welcomed. In addition, increased planning to transition from a current Level of Service (LoS) of 1 in 40 to be resilient to 1 in 200-year droughts in the future is also welcomed by the Council. If these changes creates increases resilience then it is deemed by the Council as an important inclusion in the plan.

The Council agree that an anticipatory approach is a good basis for planning in relation to preserving such a precious resource and to prevent water shortage. However, the Council is also mindful of current unknowns in relation to the long-term impacts of climate change, for example the creation of large numbers of climate refugees via the displacement from countries (or areas within countries) that have the potential to become uninhabitable by 2050 is a concern. These variables should also be considered when long term planning for demand and provision is being developed.

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The Council is also mindful of the increasing risk from climate change and its impact on the resilience of water supplies. Risk factors that the Council would like to highlight in relation to the impact of future resilience include considering the capacity of reservoirs to cope with additional stormwater and rainfall. Additionally, solids are more likely to end up in our lakes and rivers as a result of the strong flows of stormwater and heavy sustained rainfall, therefore, provision should also be put in place to address this. The Council would also like to ensure that discharge from a storm overflow is only carried out when it can be demonstrated that there is no local adverse ecological impact and that the increased occurrence of storms and the associated storm water does not become an additional pollutant to our water system.

Also, while the blue-green algae in Lough Neagh is not thought to be linked directly to climate change, there is no doubt that issues relating to climate change will exacerbate the situation. This will have a knock-on effect on the water standards, availability, and quality and as such significant efforts should be employed to address the root causes of this potentially toxic problem that could cause the biodiversity and ecological breakdown of Lough Neagh. The Council would suggest that the introduction of more effective environmental governance would be an appropriate step to counteract these issues at source.

In relation to the planned 5% reduction in leakage below the Sustainable Economic Level of Leakage, the Council would like to ensure that this target provides a significant enough reduction to make a notable impact on the current levels of water lost because of leakage. While any reduction is certainly positive, the Council is of the opinion that any target set should be as ambitious as possible to reinforce the message that water is a precious commodity that shouldn't be wasted. Also, it should be noted that the less water requiring treatment is of financial benefit to NI Water. Therefore, the maintenance of leakage management and reduction of lost water is cost effective and as such, every possible effort should be made to significantly reduce water leakage and wastage.

With regard to the implementation of an adaptive approach involving investment, 'when it becomes clear there is a need to do so' seems to lack a proactive and strategic approach. The Council would recommend at least investing in future proofing to avoid future larger scale works needing to be undertaken but that have become cost prohibitive. The Council would also suggest that more information and initiatives are put forward to further emphasise to the public that water is a limited resource, and it should be treated as such, especially as the world struggles to effectively address the climate crisis. A change is required in the public's attitude towards water use, water conservation and limiting wastage. This type of initiative may also encourage reduced water demand which in turn will ensure that water is not being treated and distributed unnecessarily.

Finally, the Council would also recommend that additional signage and enforcement measures be put in place in relation to water pollution. There is a general lack of awareness regarding the penalties for pollution. Better communication of penalties may lead to a decrease in pollution and improve the water quality so that it is more resilient to the impacts of climate change.

Mid Ulster District Council looks forward to being informed of the outcome of this consultation.

Yours sincerely

Cllr Dominic Molloy

Chairperson, Mid Ulster District Council