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Living With Water in Belfast Consultation
Department for Infrastructure
Room1.14, Clarence Court
12-18 Adelaide Street
Belfast
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27th January 2021

Living with Water in Belfast Consultation response

The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing approximately 11,500 farming families. The UFU represents farmers from all areas of Northern Ireland, across all sectors and has a vision of a productive, profitable and progressive farming sector.

Thank- you for engaging with the UFU and allowing us the opportunity to respond to this consultation. The UFU is supportive of the Living with Water (LWW) project, as it is well recognised Belfast has and continues to experience drainage and wastewater management issues. Rainfall is becoming less predictable. It is challenging for the current infrastructure to manage the frequent and more intense rainfall in short periods of time that we are experiencing in NI.

There is a need to improve the way water flows through both urban and rural areas to decrease the risk of flooding. In improving drainage and wastewater management using a holistic approach there are possible social, economic and environmental benefits, in addition to flood prevention.

The UFU agrees 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 prevent sewage spilling into the City's rivers and Belfast Lough. The increased use of Sustainable Drainage Systems (SuDS) and installation of green and blue infrastructure as part of the LWW programme will provide wider benefits than just water flow control. SuDS could be used by local community groups to educate on the environment and climate change, and furthermore could visually enhance green spaces in Belfast and improve mental health and the quality of life in urban areas.

The UFU cannot agree with the statement contained in the consultation '*Poor land management practices including over- use of fertilizers and poor management of livestock can cause pollution in our rivers and coastal water.*' The Nitrates Directive (91/676/EEC), was introduced in 1991 and aims to protect water quality from pollution from agriculture sources and promote good farming practices. Farmers have over the years invested in protecting water quality through fencing off water courses, alongside implementing nutrient management plans as part of the Nitrates Action Plan which outlines rules for the management and application of livestock manures and other fertilisers. Farmers endeavour to use slurry and fertiliser sensibly to conserve nutrients, protect watercourses and the wider environment. We find that such statements are not reflective of a whole industry, and serve only to

alienate the very people you wish to engage with. Farmers have been land managers for many years and have a role to play in Natural Flood Management (NFM). Using NFM techniques alongside more traditional hard engineering methods can reduce the reliance on engineered defences and make catchments more resilient.

As stated in the consultation document ‘ *A number of opportunity (NFM) sites have been considered and identified with this Plan and are noted within the following chapters. However, there are currently no means of encouraging and incentivising private land owners to utilise their land for NFM purposes. Therefore, in order to make full use of our green spaces, new policy guidance will be developed to enable NFM to be considered and applied where appropriate.* ’ UFU are supportive of NFM as there are benefits for both farmers and the wider landscape and community. When developing the policy guidance on NFM and considering how to incentivise farmers participation in NFM schemes, the UFU would like to be involved. Farmers can and already do play a role in preventing flooding as many have already undertaken projects as described in the consultation such a planting trees. Where NFM is utilised on private land, the loss on income from agriculture must be compensated for and should come from outside the agriculture budget.

The UFU look forward to further engagement with the LWW project. If you require any further information, please do not hesitate to get in contact.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'David Brown', with a stylized, cursive script.

David Brown
UFU Deputy President