



Department for

Infrastructure

An Roinn

Bonneagair

Department for

Infrastructure

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Summary Report on Consultation Responses

Grant Scheme to Support Reservoirs Managers

with the initial supervision & inspection requirements of
The Reservoirs Act (Northern Ireland) 2015

February 2026

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Section 1: Introduction

The Department for Infrastructure (DfI) ran a 12-week consultation between 23rd June and 16th September 2025 on a proposed grant scheme to assist reservoir managers with initial supervision and inspection costs as required by the Reservoirs Act (Northern Ireland) 2015. The consultation sought views on how DfI propose to introduce a grant scheme to provide financial assistance to eligible reservoir managers. It provided an opportunity for everyone to express their views regarding a proposed grant scheme to support with the initial costs arising from the Act. The Department was especially interested in obtaining the views of reservoir managers and others with an interest in the management of reservoirs.

The consultation document made it clear that this grant scheme would help those reservoir managers who need it to meet their initial supervision and inspection costs and that until reservoir managers undertake the required inspections, the scale of any potential capital costs will not be fully known. Therefore, a further consultation on potential grant support in relation to capital costs to address matters in the interest of safety will be required once inspections and costings have been completed.

This consultation summary report provides a high-level analysis of the responses to the public consultation.

Section 2: The Consultation Process

The public consultation on a grant scheme to support reservoir managers with the initial supervision and inspection costs launched on Monday 23rd June 2025 and ran for 12 weeks until 16 September 2025.

The consultation document could be viewed and downloaded from the Department's website at: [Grant support for initial supervision and inspection requirements of the Reservoirs Act | Department for Infrastructure](#). Views and feedback were encouraged to help inform any future decisions on proposals to provide a grant scheme.

The consultation document was issued to targeted consultees, including private reservoir managers, organisations that are reservoir managers such as local

Councils, other public bodies that manage or are involved in the management of reservoirs and wider stakeholders.

A Departmental press release was issued on 23rd June 2025 to mark the start of the consultation period. Information was also made available on the Department's website, and social media updates were issued throughout the consultation period. Consultees were invited to respond to the consultation either via a link in the consultation to the digital platform Citizen Space, or by email to a dedicated email address at FloodingandDrainagePolicy@infrastructure-ni.gov.uk. The consultation and the Section 75 Equality Impact Assessment were made available to view on the Department's website.

The consultation was designed to ascertain people's views on the Department's proposals for a grant scheme to help those managers of controlled reservoirs who need it to meet their initial supervision and inspection costs following the further commencement of the Act.

The consultation document and the associated Citizen Space survey therefore asked respondents:

- if they agreed that only reservoirs not managed by a public sector organisation are eligible?
- if they agreed that the reservoir must be designated as 'High' or 'Medium' consequence?
- if they agreed that Reservoir Managers must demonstrate a financial need for grant support for initial inspection costs?
- if they agreed with the Department's method for assessing affordability?
- if they agreed with the level of funding ie. up to a maximum of £10,000?
- which of the Department's proposals for payment of grant did they prefer – that the Department pays engineers directly, or that the Department pays reservoir managers?

In addition to the six specific questions asked around eligibility criteria, the consultation asked two further questions:

- if you any further comments on the potential grant scheme for initial supervision and inspection requirements please provide any relevant information below?
- do you have any comments to make on any of the draft impact assessments that accompany this consultation?

The consultation survey provided eight free text boxes to allow respondents an opportunity to elaborate on their answers.

Section 3: The Consultation Responses

In total, 16 responses were received. This is a modest response in proportion to the number of targeted consultees and those involved in the management of reservoirs in the North.

Consultees responded in one of three ways:

Type of response	Number received
Citizen Space online survey (answers to specific consultation questions, plus free text comments)	8
Written reply to the consultation mailbox using the 'template' response*	6
Written reply to the consultation mailbox not using the 'template' response*	2
<i>All types</i>	<i>16</i>

Due to the volume of comments provided in the eight free text boxes we have analysed the consultation responses in two ways.

- The survey responses have been analysed quantitatively, and the results are shown in the bar charts below.
- The free text responses and written comments have been analysed qualitatively. This was then used to draw out the key themes raised in the

consultees' responses and identify areas of commonality. The key themes most often raised by respondents are noted below.

We have also included a small comment in the analysis for each of the first six questions, comparing the various responses by sector where possible.

Section 4: Analysis of Responses

Of the 16 responses, 14 (88%) declared themselves to be from organisations, 1 (6%) declared as an individual, and 1 (6%) was from an anonymous consultee.

Broken down by sector we can see among the responses that 4 are from public sector organisations, 5 appear to be from privately owned reservoirs and 5 are from the angling community.

Survey Responses

This section provides a high-level summary of the responses to the questions posed in the consultation.

Question 1

This question asked respondents *“Do you agree with eligibility criterion 2 that only reservoirs not managed by a public sector organisation are eligible?”*

The majority (11 out of 16) of the responses were in favour of this proposal. 3 were against, and 2 did not answer this question. The consultees who agreed with this proposal did not expressly stipulate why, with the consultees who did not agree giving reasons as follows:

- Grant funding should be made available to all reservoir managers including local authorities who need financial assistance with the initial costs of complying with the Act.
- The consultation suggests that councils and other public bodies have “established mechanisms for securing budget to maintain their assets.” but in practice, this does not reflect the reality of constrained local authority budgets.

- Reservoirs are statutory safety responsibilities, but they generate little or no financial return. The costs of ensuring safety falls directly on ratepayers, and the Department risks creating an uneven system where some reservoir managers are supported but not others – safety should apply equally across all sectors.

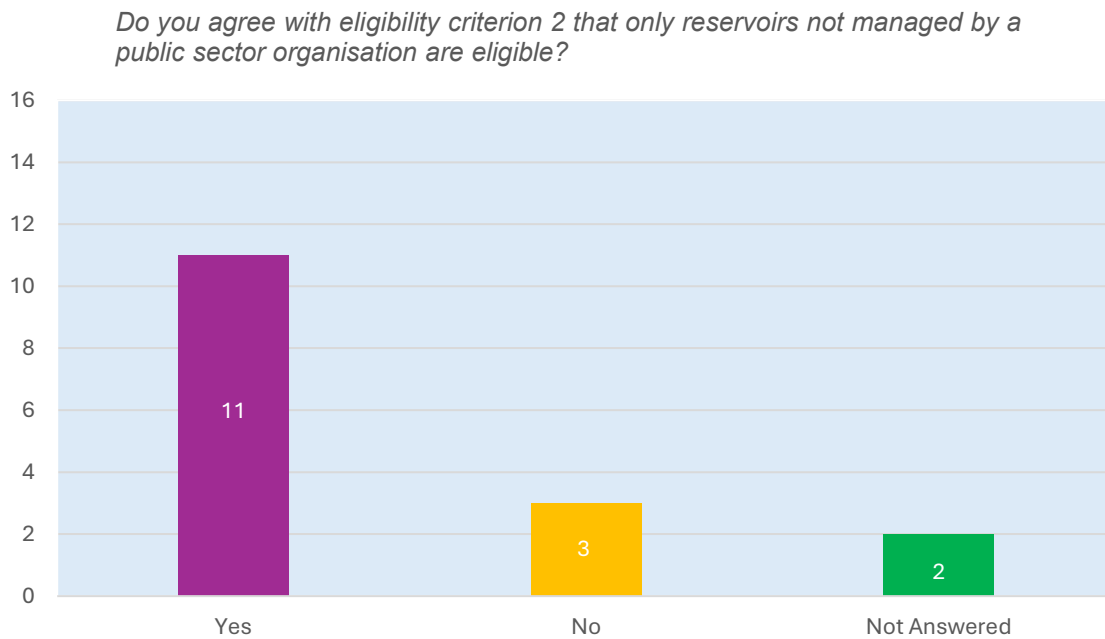


Figure 1 above shows the breakdown of the 16 responses that were received

Sectoral Comment

The majority of the public sector organisations disagreed with this proposal (11 agreed) whereas the angling community and private owners all agreed in favour of it.

Question 2

This question asked respondents *“Do you agree with eligibility criterion 3 that the reservoir must be designated as ‘High’ or ‘Medium’ consequence?”*

The majority (10 out of 16) of respondents were in favour of this proposal. 3 were against, and 3 did not answer this question. As with Question 1, those consultees who

agreed with the proposal did not give detailed reasons why, however among those who disagreed, the following themes could be identified:

- All reservoirs should be eligible. While the consultation notes that low consequence reservoirs are not subject to the same level of regulation, they still require active management and safe operation.
- Consequence levels can change. Excluding low consequence reservoirs risks underfunding preventive safety and creates inequity in support.
- High consequence should be sufficient.

Whilst not directly addressing this specific question, some respondents took the opportunity at this point to highlight their concerns around the calculation of the volume of reservoirs by the Department, stating:

- There has been considerable uncertainty and debate about how the threshold of 10,000m³ is accurately assessed. Further consultation and guidance on this are urgently needed. Issues such as the silting of historic watercourses, lakes and reservoirs are a very material factor and have led to considerable concern amongst reservoir managers.
- We agree - Provided the designation of "High" or "Medium is accurate in relation to the reservoir. This consultation states "capable of holding 10,000 cubic metres of water above the natural ground level of any part of the surrounding land" BUT what we are not being informed by Dfl is that this also includes the bed of any outlet from the reservoir.

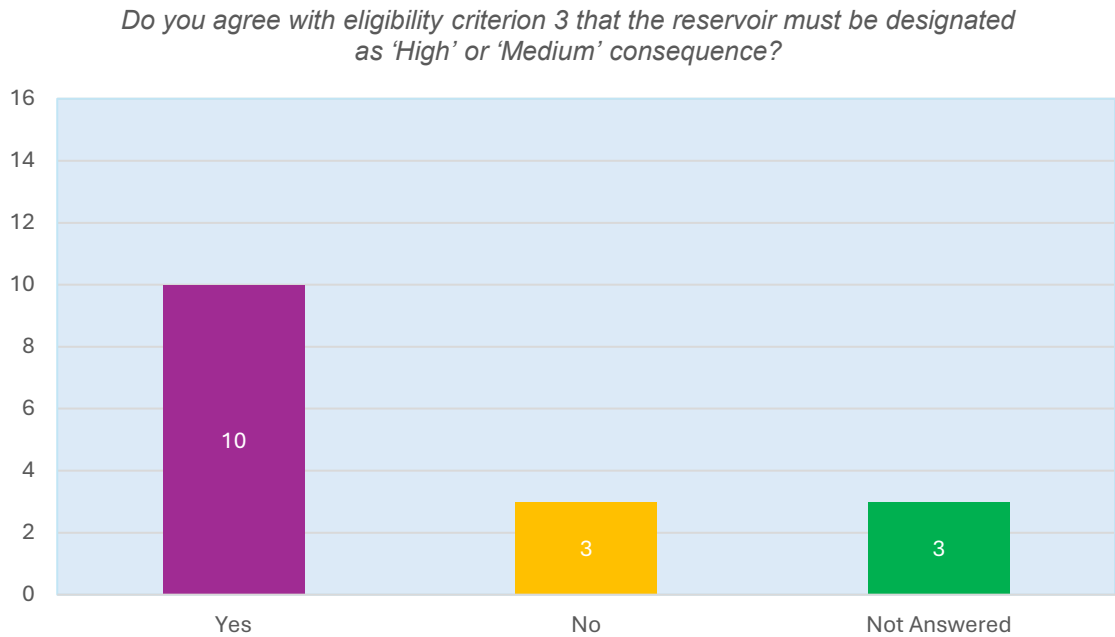


Figure 2 above shows the breakdown of the 16 responses that were received

Sectoral Comment

While a few respondents did not respond to this question it was clear to see that the majority of privately owned reservoirs and angling clubs agreed with this proposal. Of the public sector respondents 2 agreed and 2 disagreed with this proposal.

Question 3

This question asked respondents *“Do you agree with eligibility criterion 4 that Reservoir Managers must demonstrate a financial need for grant support for initial inspection costs?”*

The majority (13 out of 16) of respondents disagreed with this proposal. 2 agreed and 1 did not respond to the question. Analysis of the reasons given for disagreement with the proposal centred around the following reasons and themes:

- Clubs and recreational users of reservoirs responded that they didn't have the finances to deal with the requirements of this legislation and that recurrent inspection costs would use up club reserves and render them unviable in the long term.

- The Reservoirs Act has resulted in significant resource implications for organisations which manage reservoirs. If there is a legal requirement for reservoirs to be inspected, then the Department should pay for these costs.
- Reservoir safety is a matter of public protection. Creates inequality as it is not fair that some Reservoir Owners benefit from the grant, while others don't. The consequences of reservoir failure can be severe. Supporting all managers in meeting inspection requirements—regardless of financial status—helps ensure consistent safety standards across the board.
- Requiring proof of “financial need” misses the point — safety is a statutory duty, not a discretionary expense. All reservoir managers should be supported equally.
- Although more aligned to Q5 in the consultation, several respondents raised concerns at this point about the grant amount of up to £10,000 being unrealistic and insufficient and called for the amount to be raised. Some respondents also took the opportunity at this point to highlight their concerns around future capital costs.

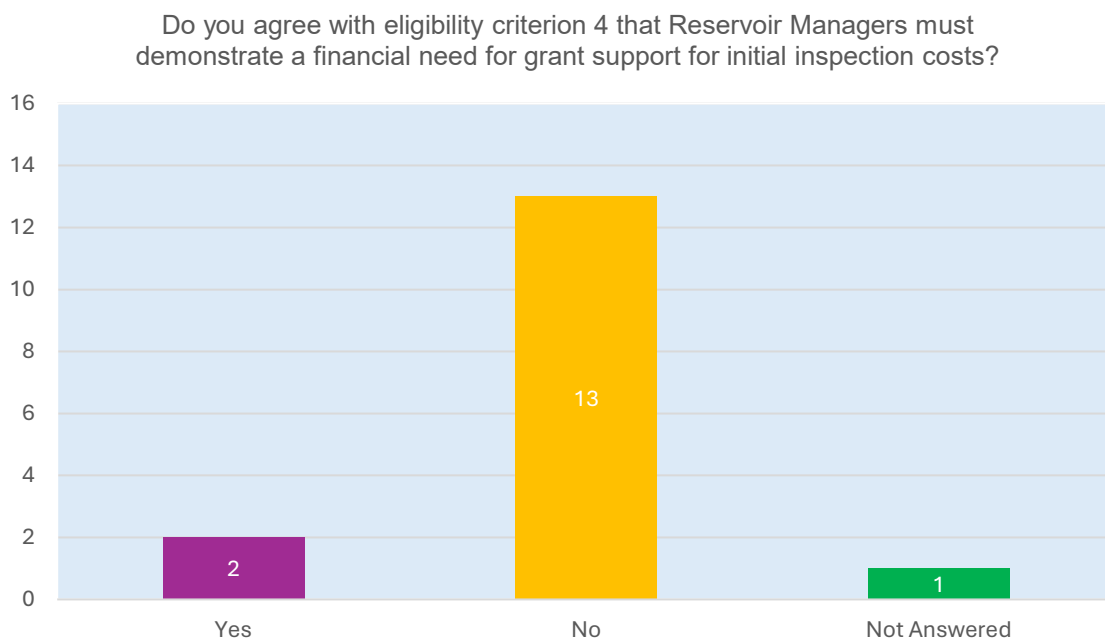


Figure 3 above shows the breakdown of the 16 responses that were received

Sectoral Comment

As stated above, the majority of respondents disagreed with this proposal. This included all of the private and angling community respondents. Once again there was a split amongst the public sector organisation respondents with 2 agreeing and 2 disagreeing with the proposal.

Question 4

This question asked respondents *“Do you agree with the Department’s method for assessing affordability?”*

The majority (12 out of 16) of respondents disagreed with the proposal. 3 agreed, and 1 did not respond to the question. Analysis of the reasons given for disagreement with the proposal centres around the following themes:

- Income and expenditure are highly seasonal and a six-month window is not a reliable indicator of capacity to fund the inspection costs.
- The test proposed is simply too crude and completely ignores the underlying trading pattern of a business.
- Other comments received included the need for transparent, objective criteria, with a suggestion that in the interests of fairness, a universal flat rate grant (e.g. £10,000) should be provided to all reservoir managers, regardless of financial status, ensuring a consistent safety baseline.
- Further comment stated introducing affordability checks creates unnecessary bureaucracy and may discourage applications, suggesting that grant support should be made universally, recognising that reservoirs provide essential public safety but little financial return.

- Several respondents' answers were very similar to their response for the previous question, re-iterating that they didn't have the finances to deal with these requirements and that without support their organisations/clubs would become unviable.

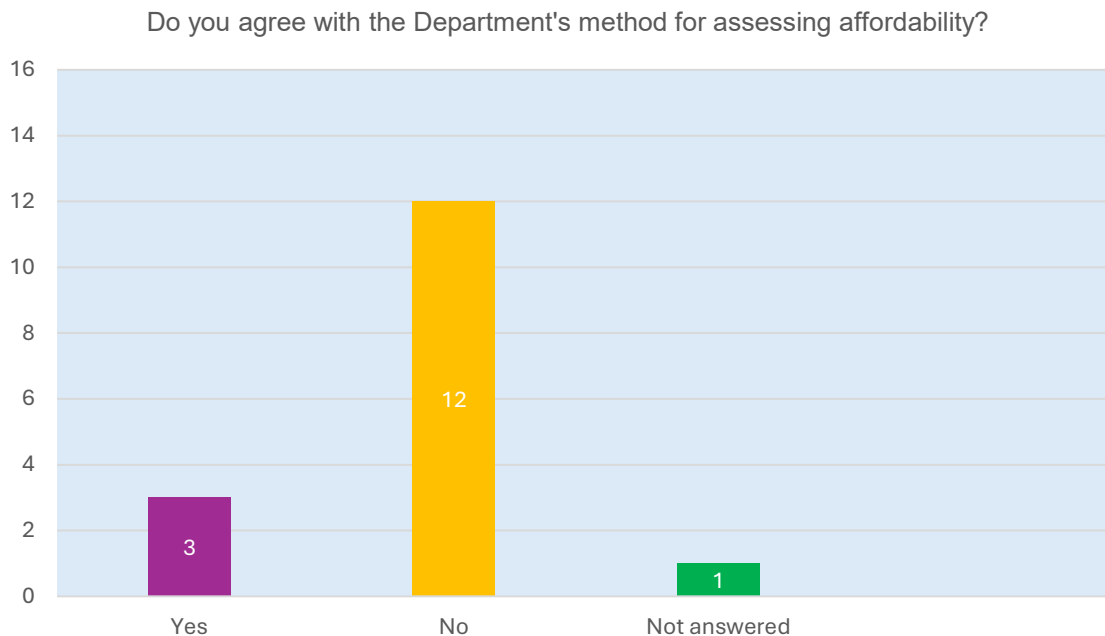


Figure 4 above shows the breakdown of the 16 responses that were received

Sectoral Comment

The majority of respondents disagreed with this proposal. This included all the private and angling community respondents. Once again there was a split amongst our public sector organisation respondents with 2 agreeing and 2 disagreeing with the proposal.

Question 5

This question asked respondents “Do you agree with the level of funding ie. up to a maximum of £10,000?”

Half of respondents (8 out of 16) disagreed with this question. 6 agreed, and 2 did not answer the question. Of those who disagreed, there was consensus that £10,000 is not a sufficient amount. Specific comments in the responses included:

- DFI assumes £10k will cover supervision and inspection, this is not guaranteed.
- The cap for funding should be at least £35,000 per reservoir.
- It is unfair for the owner of the reservoir to bear costs greater than £10,000 for this initial supervision and inspection.
- Can it be clarified if it will be £10,000 per Reservoir Manager or per reservoir which that manager owns?
- The estimated costs of undertaking work needed prior to any inspection renders the offered support of £10,000 somewhat meagre.

The consultation made it clear that this proposed grant scheme would help with the initial supervision and inspection costs and a further consultation on potential grant support in relation to capital costs will be required once inspections and costings have been completed. However, once again, some respondents took the opportunity at this point to comment on their concerns about potential future capital costs. Comments in these responses included:

- Engineer recommendations often require capital works of £100,000 or more per reservoir.
- A fixed £10,000 cap does not reflect the scale of safety responsibilities of reservoir managers. Funding should either be flexible to reflect actual costs or set at a higher level to meet real needs.
- Whilst the consultation notes this as a benchmark, actual costs extend far beyond initial inspections.

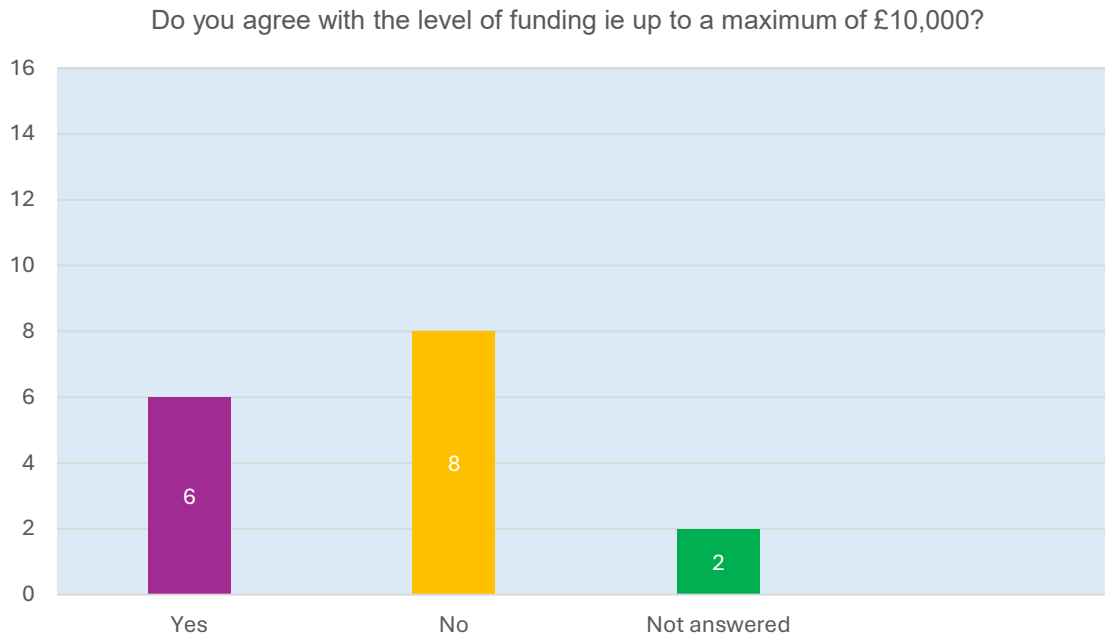


Figure 5 above shows the breakdown of the 16 responses received

Sectoral Comment

Out of the 50% of the respondents that disagreed with this proposal, these were largely from the privately owned reservoirs and the public sector organisations, with the angling community agreeing with the proposed level of funding.

Question 6

This question asked respondents *“Which of the Department’s proposals for payment of grant do you prefer?”*

A narrow majority (9 out of 16) of respondents preferred the option to pay the grant directly to engineers. 5 preferred to pay the grant to reservoir managers, and 2 did not respond. For those that preferred the grant paid directly to the engineers key themes to emerge from the comments were:

- Paying engineers directly reduces the burden on reservoir managers.
- Pay engineers directly also ensures independence, reduces administrative burden, avoids delays in payment, and guarantees transparency. It also ensures engineers are paid promptly, which strengthens confidence in the safety process.

One of the comments in favour of paying the grant to reservoir managers was that the responsibility of employing a suitably qualified engineer falls to the Reservoir Manager and as such they should pay them and have the contract with them. If the Department were to pay the engineers directly then this negates some of this responsibility. Several responses also mentioned the issue of the recoverability of VAT.

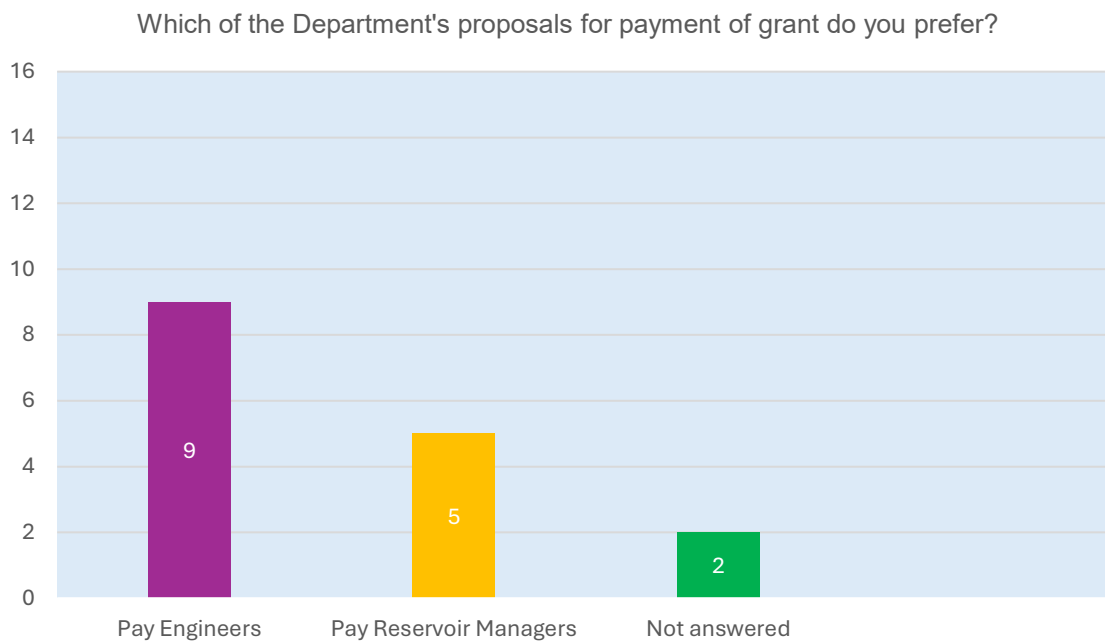


Figure 6 above shows the breakdown of the 16 responses received

Sectoral Comment

The angling community were unanimous in their preference for any grant to be paid directly to the engineers with the private owners more generally favouring any grant to be paid to them. Once again there was a split in preference among the public sector respondents.

Question 7

This question asked respondents via a free text box *“If you any further comments on the potential grant scheme for initial supervision and inspection requirements please provide any relevant information below.”*

Half of the respondents (8 out of 16) used this facility to share their views. Some of the comments were not directly relevant to the grant scheme being consulted on and included a range of concerns with the further implementation of the Reservoirs Act (Northern Ireland) 2015 in general. Comments relevant to the grant scheme included:

- The grant scheme should be funded adequately to absolve non-profits and SME's from the cost of compliance with an Act that reservoir managers haven't asked for.
- Reservoir safety is a statutory duty that provides no direct financial return to managers. In addition to supervision and inspection costs there are a number of other costs including implementing engineer's recommendations. As such grant support should therefore reflect the full scale of costs, apply to all reservoir managers and be designed to ensure that safety is consistently delivered across Northern Ireland.
- A grant scheme should include 100% funding for all initial statutory Section 10 inspections and ongoing support for Supervising Engineer costs for high-risk reservoirs.

Some of the comments not directly related to this grant scheme for initial costs included:

- The minister needs to look at how fishing helps people both mentally & physically, it is an escape from day-to-day stresses. Ministers should welcome any sport which demonstrates this.
- Capital costs should be included and synchronized with the initial inspection scheme.
- There should be a grant towards total annual costs.
- Clarity is needed on how, when and the level of support that is needed to deal with the negative findings of these inspections. The legislation imposes what amounts to an offence of strict liability on reservoir managers without any clarity on what support is going to be available. As was made plain when the legislation

was being brought in the lack of financial support from government will mean that reservoir managers faced with enforcement will be left with no alternative but to drain the reservoir.

Question 8

This question asked respondents via a free text box “*Do you have any comments to make on any of the draft impact assessments that accompany this consultation?*”

5 out of 16 respondents used this facility to share their views. There were a range of different comments, including some issues over visibility and accessibility, as well as calls for the assessments to be strengthened to acknowledge the financial burdens on public bodies and community groups and the potential knock-on effects for clubs etc.

Comments included:

- The impact assessments are referenced but not clearly summarised or linked in the main consultation document making it difficult for stakeholders to engage meaningfully with them unless they actively search for page 5 or supporting documents. It would be helpful if the Department provided a concise summary of each impact assessment (e.g. equality, rural needs, environmental, financial) and how the grant scheme or inspection requirements might affect different groups.
- While the Equality Screening Form states that the policy will have no disproportionate impacts across Section 75 groups and benefits the whole population by improving safety, there are important practical and financial considerations that should be more fully reflected in the draft assessments.
- The Department acknowledges that implementation of the Act will place additional legal and financial requirements on Reservoir Managers. However, the draft impact assessments do not sufficiently recognise the scale of these costs.
- The Equality Screening rightly identifies that reservoir safety benefits everyone. However, to meet the spirit of Section 75 and human rights considerations, the assessments should go further in recognising that without

comprehensive financial support, councils and community groups could face unequal burdens in delivering this statutory duty.

- The fundamental concern is that the consultation exercise is based on the erroneous position that 'reservoir owners will be...are already responsible for safety under common law and therefore should already be incurring many of the associated costs.' Upon what evidence has that statement been based? Yes there is a common law duty but that is tortious in nature. It is indisputable that statutory codification in the terms of the Act increases those duties extensively - if it were otherwise the legislation would not have been required. There has been limited to no consultation about the affordability issues. A Rural Needs Impact Assessment does not actually capture the needs or impact on the Owners concerned. The Human Rights Impact Assessment was not included as a document in this consultation exercise so we cannot reasonably be expected to comment on its adequacy - particularly the impact on the human rights of reservoir owners such as their Article 8 Rights.

Section 5: Summary and Conclusion

With 16 consultation responses received, the public consultation on a potential grant scheme to support reservoir managers with the initial supervision and inspection costs demonstrated a modest interest from reservoir managers and others with an interest in the management of reservoirs, on the Department's proposals for the proposed grant scheme.

There was strong endorsement for the grant only being eligible for reservoirs not managed by a public sector organisation, with a similar level of support for only high and medium consequence reservoirs being eligible for a grant.

However, just over 81% of respondents were opposed to reservoir managers having to demonstrate a financial need for grant support, with respondents emphasising their lack of funds and the potential this criterion had to create inequality. There was similar opposition (75%) around the Department's proposed method of assessing affordability.

The last 2 questions around eligibility criteria (level of funding and method of payment) showed somewhat of a more mixed response but respondents highlighted clear concerns around the proposed amount not being enough with a split in views as to who the Department should make any grant payment to. These views on the level of funding and method of payment will inform the business case for this grant scheme.

Many respondents used the last 2 questions as another opportunity to comment on the potential future capital costs and again to raise concerns over their finances and ability to pay. As highlighted above, a further consultation on potential grant support in relation to capital costs to address matters in the interest of safety will be required once inspections and costings have been completed.

The Department welcomes the constructive feedback and the views provided by the respondents. However, recognising a number of key factors such as an ongoing constrained budgetary environment and the requirements of MPMNI in relation to the ensuring best value for money and affordability, it would be the Department's intention to introduce a grant scheme that:

- Is available for reservoirs not managed by a public sector organisation (this is approximately 57 of the 172 controlled reservoirs in the North)
- Is available for reservoirs designated as High or Medium consequence
- Requires eligible Reservoir Managers to demonstrate financial need.

Should the secondary legislation be passed allowing this grant scheme to be implemented, the Department is committed to working with respondents further to administer a grant scheme for those who need it at a scale and pace achievable within available budgets.

In the meantime, the Department will now commence work on identifying options to assist reservoir managers demonstrate a financial need should they wish to avail of grant assistance.

List of Respondees

Ulster Angling Federation

Creggan Country Park

Armagh Fisheries Limited

Environment Agency

Castlewellan and Annsborough Angling Club

Clandeboye Estate Company Limited

Lissanoure Farms Ltd

NI Water

Ligoniel Improvement Association

Newry, Mourne and Down DC

Fly Fishers Club of Enniskillen (2 responses)

Ulster Farmers Union

Belfast CC

Historic Houses

1 private individual

1 anonymous individual



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