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22_IW_FP_46_CalDLAP

Re: Draft Caherconlish Local Area Plan 2023 - 2029

Dear Sir/Madam,

Irish Water (IW) welcomes the opportunity to comment on the Draft Caherconlish Local Area Plan 2023-2029 (Draft Plan). We have provided observations and comments on the Draft Plan in relation to public water services below and will continue to engage with Limerick City and County Council as the Plan preparation process progresses.

1. General

1.2 Sustainable Drainage and Green-Blue Infrastructure

Irish Water welcomes the inclusion of objectives and initiatives supporting the implementation of Sustainable Urban Drainage Systems (SuDS) and the enhancement of green and blue infrastructure, which is provided for in the NPF under NPO 57. SuDS and Green-Blue Infrastructure (GBI) are encouraged in new developments including the public realm and retrofitted in existing developed areas.

These measures can provide a cost effective and sustainable means of managing stormwater and water pollution at source, keeping surface water out of combined sewers while providing multiple benefits e.g. improved air quality, amenity, noise reduction. The removal of stormwater from combined sewers, thus increasing capacity for foul drainage from new developments, is particularly relevant to the achievement of compact growth objectives.

Irish Water would be happy to engage with any planning authorities interested in progressing nature-based rainwater management initiatives in line with the recently issued Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document.

1.3 Planned road and public realm projects

Planned public realm, active travel and road projects have the potential to impact on Irish Water assets and projects e.g. tree planting, building over of assets, new connections, programming network upgrades in advance of road project, provision of future-proofing ducts. The potential Groody River walkway is an example of a project that may impact on public water services assets.

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Development in the vicinity of Irish Water assets must be in accordance with our Standard Details and Codes of Practise. Diversion Agreements will be required where an Irish Water asset needs to be diverted or altered.

Where planned development may impact on Irish Water assets, early engagement is requested to ensure public water services are protected and access is maintained, and to enable Irish Water to plan works accordingly and ultimately minimise disruption to the public.

2. Proposed Core Strategy and Availability of Water Services

2.1 Zoning

A high-level review of the land-use zoning map has been carried out. Available network information indicates network extensions may be required to service some zoned sites. Depending on the extent of development realised, localised network upgrades may also be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less. Much of the wastewater network within Caherconlish is 150mm in diameter and therefore localised upgrades are likely to be required to facilitate future development. Similarly, available GIS information indicates the Gragane area is served by a 75mm dia. watermain which may require upgrade to facilitate residential development in this area.

In order to maximise the use of existing water services, we encourage phased sequential development in areas with existing water services infrastructure and spare capacity. Similarly, to maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted.

Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Irish Water projects in place to progress such works.

All new residential and commercial/ industrial developments wishing to connect to an Irish Water network are to be assessed on a case by case basis through Irish Water's New Connections process which will determine the exact requirements in relation to network and treatment capacity. New connections to Irish Water networks are subject to our Connections Charging Policy. Further information on this process is available at: https://www.water.ie/connections/developer-services/. Third-party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure e.g. on some 'backland' sites, housing estates with private water network. This may apply to the Enterprise and Employment site.

Where Irish Water assets are within a proposed development site, these assets must be protected or diverted. If there is a possibility that Irish Water assets will need to be altered or diverted as a result of a proposed development, a diversion agreement may be required. Further information on this process is available at: https://www.water.ie/connections/developer-services/diversions/.

We would be happy to engage with Limerick City and County Council further in relation to the serviceability of sites as required.

2.2 Wastewater Infrastructure

2.2.1 Wastewater Treatment Plants (WWTPs)

The 2021 wastewater treatment capacity register indicates there is potential spare capacity of approximately 860 population equivalent available. The WWTP is currently not compliant with its license limits but is capable of achieving at least Urban Wastewater Treatment Directive standards. Potential availability of capacity would be dependent on any additional load not resulting in a significant breach of the combined approach as set out in Regulation 43 of the

Waste Water Discharge (Authorisation) Regulations 2007, which is a matter for the Planning Authority to consider.

Caherconlish was also nominated by Limerick CCC for inclusion in the Small Towns and Villages Programme (ranked no. 4). Hospital (ranked no. 2) was announced in 2021 and is currently progressing. A number of investment cycles will be required to address all candidates in the STVGP, and IW plan to continue this Programme into the next investment period (2025-2029) and beyond to achieve this (subject to the regulatory approvals process). During the current Investment Plan period (2020-2024) we will continue to complete strategic assessments on treatment plants in the nominated settlements to enable us to continue delivering projects under this programme during this and into the next investment period. Local Authorities will be given the opportunity to update their priority list in 2023. It should be noted that a project typically takes between 5 and 7 years to complete once the initial Strategic Assessment (scoping) stage has been concluded and approvals for progression of that project are in place.

2.2.3 Wastewater Networks

Irish Water and Limerick City and County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, etc. Irish Water and Limerick City and County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. As noted in section 2.1, due to the prevalence of 150mm diameter sewers, upgrades are likely to be required. There are no other known major constraints on Caherconlish wastewater network.

2.3 Water Supply Infrastructure

2.3.1 Water Supply

While it is envisaged there is adequate capacity available to cater for the projected growth, there are constraints within the water supply. Groundwater investigations are underway to determine if the existing supply can be augmented. If this is unsuccessful, opportunities to interconnect with Limerick City Water Resource Zone (WRZ) or other nearby WRZs will be investigated.

Following public consultation, the National Water Resources Plan (NWRP) Framework Plan was adopted in Spring 2021. The next stage of the NWRP is now underway and involves the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. The Eastern and Midlands Regional Water Resources Plan, which includes Caherconlish, was recently adopted following public consultation.

2.3.2 Water Networks

Irish Water and Limerick City and County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Irish Water and Limerick City and County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

3. Comments and Suggestions on the Draft Plan text

Topic	Comment
Projected Growth for Caherconlish	Table 3.1 forecasts 146 units for 2022-2029 in line with LDP, while Table 3.2 forecasts 164 units. Table 3.2 appears to include the equivalent potential housing yield that arises from the zoning of Additional Provision lands which provide for a degree of choice. Would it be more appropriate to have 146 in the 'Additional households forecasted 2022-2029' column in Table 3.2 to ensure alignment with the core strategy table and objective CS03 of the LDP? Clarification on this will assist with Irish Water's planning for future growth.

9.2 Water and Wastewater infrastructure	Suggested amendment: Objective IU 01: Wastewater Infrastructure: b) …. This includes the separation of foul and surface water through the provision of sewerage networks and nature-based rainwater management measures. Suggested addition: Objective IU 02: Water Supply Infrastructure: c) To promote water conservation and demand management measures among all water users, and to support Irish Water in implementing water conservation measures such as leakage reduction and network improvements, including innovative solutions in specific situations. Refer also sections 2.2 and 2.3 above.
9.3 Surface Water Management and SuDS	We suggest including a reference to the DHLGH Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practise Interim Guidance Document. To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted.
Development of Masterplans and engagement with Irish Water e.g. Table 4.2, Objective DS O1: Residential Development	IW supports the requirement to prepare masterplans for proposed developments. As part of the master-planning process, consideration should be given to how these sites will be serviced as well as to potential impacts on Irish Water infrastructure and projects e.g. building over of assets, tree planting, synergies with planned IW projects, opportunities for surface water removal. A Pre-Connection Enquiry can be submitted to our Connections and Developer Services team to assist with this.
Land Use Zoning Matrix	Consideration should be given to including water supply and wastewater infrastructure in list of development types.
Environmental Reports	The contents of this submission should be taken account of in the Environmental Reports.

Yours Sincerely,

Elaine Heneghan
Regional Forward Planning Specialist
Asset Strategy