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22_IW_FP_47_Abbeyf

Re: Issues Paper – Abbeyfeale Local Area Plan 2023-2029

A Chara,

Irish Water (IW) welcomes the opportunity to comment on the Issues Paper for the Abbeyfeale Local Area Plan 2023-2029. We have provided some observations and suggested text and objectives for inclusion in the draft Local Area Plan below and attached. We will continue to engage with the planning department as the development plan process progresses.

1. General

Zoning

Irish Water are available to assist in the process of identifying suitable zoned lands from a water services perspective. Sequential development in areas with existing water services infrastructure and spare capacity is encouraged. In assessing the infrastructure requirements to service a large area of land, it is preferable to have an overall development masterplan including phases of development and timelines so that an overall strategic water services plan for the lands can be developed.

Localised network reinforcements e.g. extensions, may be required to service some zoned sites, depending on the location and scale of development. Network upgrades are more likely to be required in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less. In order 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. The removal of stormwater from combined sewers using nature-based sustainable drainage solutions is strongly encouraged in order to free up capacity for future development.

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

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/>. 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. backlands.

In settlements where the Wastewater Treatment Plant (WWTP) is close to lands with potential for the development of sensitive receptors e.g. residential dwellings, any future development of these lands should take account of the established use of the existing wastewater treatment plant and the potential for extensions / intensification of use of the WWTP in the future.

With regard to zoning and development in lands with no public water services infrastructure, as outlined in Draft Water Services Guidelines for Planning Authorities (Jan 2018), Section 5.3: 'It is the policy of Irish Water to facilitate connections to existing infrastructure, where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or wastewater treatment plants should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.'

Sustainable Drainage and Green-Blue Infrastructure

Irish Water encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new developments including the public realm and retrofitted in existing developed areas, in line with NPO 57 of the National Planning Framework. 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 (thus increasing capacity for foul drainage from new developments), while providing multiple benefits e.g. improved air quality, amenity, noise reduction.

Irish Water are currently liaising with Limerick CCC on a potential opportunity to remove stormwater from the combined sewer network in Abbeyfeale. We would be happy to engage with Limerick CCC to discuss further opportunities, in particular to progress 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.

Planned road and public realm projects

Planned public realm and road projects have the potential to impact on Irish Water assets and projects e.g. tree planting, building over of assets, new connections, stormwater separation, requirement to programme upgrade works in advance of road project.

Development in the vicinity of Irish Water assets should be in accordance with our Standard Details and Codes of Practice, and Diversion Agreements will be required where an Irish Water asset is 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.

Wastewater Infrastructure

Wastewater Treatment Plants (WWTPs)

The 2021 wastewater treatment capacity register indicates there is potential spare capacity of approximately of 370 population equivalent available, to license compliance capability. While this will meet the needs of a portion of the projected growth, there is currently insufficient capacity available to cater for the full allocation of 566 persons, or 211 units.

An upgrade of Abbeyfeale WWTP is not included in the 2020-2024 Investment Plan. Preparation of the subsequent Investment Plan (2025-2029) is underway, and statutory consultation with planning authorities will commence 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.

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. There are no known major wastewater network constraints in Abbeyfeale however, localised upgrades/extensions may be required to facilitate development.

Water Infrastructure

Water Supply

Abbeyfeale is served by the Abbeyfeale Water Resource Zone (WRZ). The regional water resources plan for the South-West region is currently being finalised and will identify plan-level approaches to address the identified needs in Abbeyfeale in a sustainable manner. Groundwater investigations are underway to determine if the existing supply can be augmented while the long-term plan is to connect Abbeyfeale to Listowel WRZ to address the sustainable yield issues. Abbeyfeale Water Treatment Plant will be upgraded for water quality purposes while the interconnection to Listowel will cater for the projected growth. It is envisaged that the interconnection to Listowel WRZ will be progressed in the next investment plan period (2025-2029), subject to the necessary approvals.

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. There are no known major wastewater network constraints in Abbeyfeale however, localised upgrades/extensions may be required to facilitate development.

Suggested policies/ objectives

Irish Water has a suite of policies/objectives which we would like to suggest to the Council for inclusion in the Development Plan in relation to protecting Irish Water assets and the environment for the benefit of current and future population served by public water services networks. We have attached these policies/ objectives to this submission.

2. Background

National and Regional Policy

Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and the Southern Regional Spatial and Economic Strategy (RSES) and we are

committed to supporting the policies therein, subject to budgetary and environmental constraints. In this regard, we would draw your attention to Section 8 of the RSES which provides general policy direction in relation to the sustainable management of water supply and wastewater needs.

Irish Water and Limerick City and County Council will continue to work together to identify the water services required to support planned development in line with national and regional planning policies for inclusion in Irish Water Capital Investment Plans.

Water Services Policy Statement

The Water Services Policy Statement (2018 - 2025) (WSPS) was published by the Department of Housing, Planning and Local Government on 21 May 2018, as required under the Water Services Act 2017. It identifies high level objectives and priorities for the delivery of water and wastewater services over the period to 2025. It was prepared in line with the Water Services Acts to give clear direction to strategic planning and decision making on water and wastewater services in Ireland. The WSPS identifies policy objectives set across the three thematic areas of Quality, Conservation and Future Proofing.

Water Services Strategic Plan

In 2015 Irish Water published its Water Services Strategic Plan (WSSP), which sets out six strategic objectives for the delivery of water services over a 25-year period and sets a context for investment and implementation plans. These strategic objectives are:

- Meet customer expectations;
- Ensure a safe and reliable water supply;
- Provide effective management of wastewater;
- Protect and enhance the environment;
- Support social and economic growth;
- Invest in our future.

The WSSP is currently being reviewed, public consultation on the next WSSP is expected to commence in 2023.

Irish Water Strategic Funding Plan

Under the Water Services Act 2017, Irish Water is required to submit a Strategic Funding Plan to the Minister within three months of the publication of the Water Services Policy Statement. The Irish Water Strategic Funding Plan (2019–2024) was approved in November 2018 and reflects the principles, themes and policy objectives identified in the WSPS and the strategic objectives outlined in the WSSP. It outlines the costs, both operational and capital, associated with the arrangements that Irish Water proposes to make and measures that it intends to take to implement the objectives of the WSSP.

Capital Investment Plan 2020-2024

The purpose of the Investment Plan is to set out Irish Water's budgetary plan from 2020-2024 in line with the Water Services Policy Statement 2018-2025 and our strategic objectives as detailed in the Water Services Strategic Plan (WSSP). Our primary function is to provide clean drinking water to customers and to treat and return wastewater safely to the environment. In providing these services we play a central role in enabling economic growth, protecting both the environment and the health and safety of our customers and the public.

Irish Water's Capital Investment Plans are subject to final determination by Irish Water's regulator, the Commission of the Regulation of Utilities (CRU). An explanatory booklet which includes details of the planned investments in each county in the 2020-2024 Investment Plan period is available here. The list of projects and programmes included in our Investment Plan

is continuously being refined and is subject to budget, technical and environmental constraints, as well as statutory approvals.

Climate Change

Irish Water is focused on addressing the impacts of climate change by adapting our assets to be resilient to climate change and mitigating our climate impact by reducing our carbon footprint. The impacts of climate change are taken into account in Irish Water plans and projects e.g. the National Water Resources Plan.

Irish Water is preparing a strategy which will respond to global and national climate change legislative and policy frameworks for climate change action and fulfils the requirements of Irish Water's Water Services Strategic Plan 2015, The Water Services Policy Statement 2018 – 2025 and most recently the Climate Change Sectoral Adaptation Plan for Water Quality and Water Services Infrastructure 2019.

Irish Water is happy to work with the local authority to ensure the overarching goals of mitigating, and adapting to, climate change in relation to water and wastewater are achieved.

The National Water Resources Plan

Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding our environment. The NWRP will outline how Irish Water intends to maintain the balance between our supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country.

A three-pillar approach will be used in the NWRP:

1. Lose Less- leakage reduction and network efficiency
2. Use Less- water conservation measures
3. Supply smarter – sustainable supplies.

Following public consultation, the NWRP Framework Plan was adopted in Spring 2021. The next stage of the NWRP is now underway which will involve the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. The Draft South West regional plan, which includes Abbeyfeale, is currently being finalised, following public consultation earlier this year.

Drinking Water Source Protection

Irish Water has adopted the World Health Organisation (WHO) Water Safety Plan approach. Drinking Water Safety Plans (DWSPs) seek to protect human health by identifying, scoring and managing risks to water quality and quantity; taking a holistic approach from source to tap. The 'source' component of DWSPs is a key component and a priority within Irish Water, as protecting and restoring the quality of raw water is an effective and sustainable means of reducing the cost of water treatment in line with Article 7(3) of the WFD.

Irish Water is committed to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources. Good examples of where Irish Water is working in partnership with other stakeholders to protect drinking water quality are the National Pesticides and Drinking Water Action Group (NPDWAG), as well as catchment-specific NPDWAG Catchment Focus Groups. Irish Water is currently involved in pilot drinking

water source protection projects, which aim to trial catchment scale interventions to reduce the risk of pollution in water supplies.

River Basin Management Plan (RBMP)

Irish Water supports the River Basin Management Plan (RBMP) Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive initial and further characterisation activities. Irish Water is a member of Water Policy Advisory Committee, National Technical Implementation Group, and Regional Operational Committees. Irish Water works collaboratively with the EPA Catchment Science and Management Unit (CSMU) to facilitate the identification of significant pressures and the setting of environmental objectives. In addition, Irish Water supports the Local Authority Waters Programme (LAWPRO) desktop studies and local catchment assessment work through ongoing data sharing. The objectives and priorities of the RBMP 2018 – 2021 have been incorporated into IW investment plans and work programmes as appropriate, and the objectives and priorities of the third cycle RBMP (2022-2027) will be a key driver for the next investment plan.

We look forward to engaging with Limerick City and County Council as the Draft Plan progresses.

Yours Sincerely,

Elaine Heneghan

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Forward Planning

Asset Strategy & Sustainability