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23_IW_FP_20_Abbeyf

Re: Draft Abbeyfeale Local Area Plan 2023-2029

A Chara,

Uisce Éireann (UÉ) welcomes the opportunity to comment on the Draft Abbeyfeale 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 (LCCC) as the Plan preparation process progresses.

1. Availability of Water Services

Wastewater Infrastructure

Wastewater Treatment Plants (WWTPs)

The 2021 wastewater treatment capacity register indicates there is potential spare capacity of approximately of 360 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. We note also that the potential increase in households from zoned lands, consolidation sites and vacant properties, if fully realised, is likely to be well in excess of 566 persons.

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

Wastewater Networks

Uisce Éireann and Limerick City and County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, etc. Uisce Éireann 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. Network upgrades are being considered as part of LCCC's upcoming Main Street traffic scheme.

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

Uisce Éireann and Limerick City and County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Uisce Éireann 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. Watermains replacements on Main Street will be completed as part of the planned road works on Main Street.

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, e.g. site no. 6 in the settlement capacity audit (SCA).

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 e.g. site No.s 5, 8,10).

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 Uisce Éireann projects in place to progress such works.

All new residential and commercial/ industrial developments wishing to connect to an Uisce Éireann network are to be assessed on a case by case basis through Uisce Éireann's New Connections process which will determine the exact requirements in relation to network and treatment capacity. New connections to Uisce Éireann 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 SCA site nos. 1, 2, 3.

Where Uisce Éireann assets are within a proposed development site, these assets must be protected and/or diverted e.g. SCA site No.s 2, 3, 9, 10 . If there is a possibility that Uisce Éireann 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/>.

Additional site-specific comments are provided below:

SCA site 1- available GIS indicates the nearest public sewers are on an tSráid Mhóir. Connection via private network an Ardán an Cholbárdaigh may also be possible, subject to third party permissions. Local knowledge may provide greater clarity.

SCA site 5- localized upgrade of 150mm diameter sewer as far as the 225mm sewer likely to be required at the junction of Rove Crescent.

SCA site 6 – a 250mm diameter watermain is available 10m to the west however, third party permissions may be required. Alternative access to the water network is available on the L1324. Connection to the wastewater network would likely be to the sewer on L1324.

SCA sites 9,10- critical watermains pass along the southern boundary of site 9, and immediately adjacent to site 10. Account must be taken of these mains in the design layout and provision made to protect/ divert the mains in accordance with UÉ standards and procedures.

SCA site 7- the abstraction point is approximately 100m away; appropriate measures shall be taken to ensure no impact to drinking water quality. New developments which could pose an unacceptable risk to drinking water sources should not be permitted, in line with Objective IN 07 of the Limerick Development Plan. New developments must connect to the public sewer network.

SCA site 8- available GIS indicates a network extension of approx. 80m may be required to connect to the watermain in the main road.

SCA site 11- depending on the extent of development, localized upgrades may be required.

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

2. General

1.2 Sustainable Drainage and Green-Blue Infrastructure

Uisce Éireann 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, roads 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. Further to this, storm separation in the Main Street area to free up capacity for new developed is being considered with LCCC as part of the upcoming road project.

Uisce Éireann 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 Uisce Éireann 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. An example of a project that interacts with Uisce Éireann assets is the upcoming Abbeyfeale Traffic Management Scheme.

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

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

1. Other Comments and Suggestions on the Draft Plan text

Suggested amendments shown in red and deletions in strikethrough.

Topic	Comment
9.1 Water and Wastewater Infrastructure	<p>Suggested amendment:</p> <p><i>...The Abbeyfeale Water Treatment Plant, located to the south of the town will be upgraded for water quality purposes when while, subject to budgetary approvals, the interconnection to Listowel is will be progressed in the next investment programme period, which is 2025 – 2029. It is envisaged that, with these works, there will be sufficient capacity to accommodate envisaged population growth of this Plan</i></p> <p>Refer also to section 1 of our submission above.</p>
Objective IU 01 and 02	<p>UÉ welcome Objectives IU 01 and 02 related to public water services infrastructure. We note several of the objectives within IU 01 could also apply to wastewater infrastructure e.g. a), c), d), b). UÉ suggest the objectives be updated accordingly to apply to both water and wastewater infrastructure.</p> <p>Uisce Éireann suggest that the provision of a Connection Agreement with Uisce Éireann shall be a condition to the grant of planning permission for new developments.</p> <p>As a minimum, we recommend the requirement to ‘provide evidence of consultation by developers with Uisce Eireann prior to submitting planning applications’ shall apply to wastewater infrastructure also.</p> <p>IU02 (b) states ‘evidence to this effect may include correspondence from Uisce Eireann’. While Uisce Eireann can advise on the feasibility of the specific connection</p>

	<p>through our new connections process, it is the responsibility of the Planning Authority to make a determination on whether the impact to the receiving waterbody would result in a significant breach of the combined approach, as set out in Regulation 43 of the Waste Water Discharge (Authorisation) Regulations 2007.</p>
Private water services infrastructure	<p>As outlined in Draft Water Services Guidelines for Planning Authorities (Jan 2018), Section 5.3: 'It is the policy of Uisce Éireann 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. Uisce Éireann will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.'</p>
Water quality protection e.g. Obj IU 03, CH 02 (c), Policy CH 2, and potential risks e.g. C04 (a) blue-way opportunities, SCA site 7.	<p>The Abbeyfeale drinking water source is within close proximity to the town. Proposed objectives and policies within the draft LAP on the protection and improvement of water quality will apply to safeguard this drinking water source. Objective IN07, Drinking Water Source Protection, of the Limerick Development Plan shall also apply.</p>
Riparian Buffer Zones e.g. CH03 (b)	<p>Uisce Éireann welcome objectives in relation to buffers and parks along riverbanks; this will play an important role in protecting biodiversity and water quality. Notwithstanding this, the Draft Plan should allow for access to and maintenance of existing Uisce Éireann infrastructure e.g. outfall pipes, within these corridors. Similarly, provision of new or upgraded assets may be required within riparian buffers in limited instances e.g. new outfalls, expansion of riverside WWTP sites, subject to proper planning and sustainable development.</p>
Land Use Zoning Matrix	<p>Consideration should be given to including water supply and wastewater infrastructure in list of development types.</p>
Environmental Reports	<p>The contents of this submission should be taken account of in the Environmental Reports.</p>

Yours Sincerely,

Elaine Heneghan

Elaine Heneghan
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Asset Strategy