



Senior Executive Officer,
Draft Carlow County Development Plan,
Planning Department,
Carlow County Council,
Athy Road,
Carlow.

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

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21_IW_FP_49_Draft-CDP Carlow

Re: Draft Carlow County Development Plan 2022-2028

Dear Sir/Madam,

Irish Water welcomes the opportunity to comment on the Draft Carlow County Development Plan 2022-2028. We acknowledge the considerable level of work that has gone into preparing the Draft Plan. We have provided some high level updates below and we will continue to engage with the planning department as the development plan process progresses. We will provide updates to Irish Water plans and projects as updates become available.

1. General updates on IW Plans/Projects:

Irish Water 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 Draft Capital Investment Plan 2020-2024 has received final determination by Irish Water's regulator, the Commission of the Regulation of Utilities (CRU). IW is now developing a communications plan for stakeholders as part of which details of the planned investments in each county will be outlined.

National Water Resource 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. Consultation on the regional plans will commence later in 2021.

2. 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 and the revised Drinking Water Directive.

Irish Water is committed to working with public bodies and other stakeholders to protect drinking water sources. Good examples of where Irish Water is working in partnership with other stakeholders to protect drinking water quality is through the implementation of our Interim Pesticide Strategy and working with the National Pesticides and Drinking Water Action Group (NPDWAG), as well as catchment-specific NPDWAG Catchment Focus Groups. Irish Water is also 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.

3. River Basin Management Plan

Irish Water supports the RBMP Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive 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 this will continue into the third cycle.

4. Sustainable Drainage and Green-Blue Infrastructure

Irish Water welcomes the inclusion of policies and objectives supporting the implementation of Sustainable Urban Drainage Systems (SuDS) and the enhancement of green and blue infrastructure. SuDS and Green-Blue Infrastructure 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 (thus increasing capacity for foul drainage from new developments), while providing multiple benefits e.g. improved air quality, amenity, noise reduction.

5. 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. 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 against, and adapting to, climate change in relation to water and wastewater are achieved.

6. Zoning and Zoned Lands:

Irish Water is available to assist Carlow County Council in identifying suitable zoned lands from a water services perspective, as per Appendix 3 and NPO 72 of the National Planning Framework.

It is noted that Carlow County Council has indicated in the Draft Carlow County Development Plan that it intends to progress a Joint Urban Area Plan for the Greater Carlow Urban Area with Laois County Council; IW is available to assist both local authorities with high level synopsis of water networks capacity availability for proposed zoned lands during the plan process.

As a general rule, in order to maximise the use of existing water services, Irish Water encourages sequential development in areas with existing water services infrastructure and spare capacity.

Networks extensions for zoned lands:

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.

Connections to IW networks:

All new residential and commercial/ industrial developments wishing to connect to an Irish Water network are to be assessed 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.

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/>.

7. 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, programming network upgrades in advance of road project, provision of future-proofing ducts.

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 proposed to be diverted or altered.

Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Irish Water to plan works accordingly and ultimately minimise disruption to the public.

8. Small Towns and Villages Growth Programme:

The Small Towns and Villages Growth Programme (STVGP) provides funding for Water and Wastewater Treatment Plant growth capacity in smaller settlements which are not otherwise provided for in the Capital Investment Plan 2020 to 2024. The STVGP is focused on supporting growth in areas already served by IW infrastructure but where current or future capacity deficits have been identified. Irish Water is working with Local Authorities across the country to ensure that the investment is made appropriately in accordance with the relevant county development plan.

Under the STVGP scheme local authorities were asked to nominate qualifying settlements, in order of priority.

IW is currently reviewing the nominations in detail to determine which project(s) will be funded, taking into account the order of priority provided by the local authority, the allocation available and the potential solutions and cost estimates. Local Authorities are continuing to be notified of successful projects since Q2 2021, this will continue as project details are agreed.

9. Wastewater Infrastructure in Carlow:

Wastewater treatment capacity:

A Wastewater Treatment Capacity Register (WWCR) for 2019 was issued to Carlow County Council in April 2020. The 2020 Wastewater Treatment Capacity Register is currently being prepared and will be issued to LAs once finalised in the coming months. In the interim the attached table provides capacity updates for the settlements listed in the Core Strategy (Table 2.7) of the Draft County Development Plan.

As you can see from the attached Table 1, the three main settlements which are currently constrained by wastewater treatment capacity are Tullow, Muinebeag and Leighlinbridge, and for which IW is progressing WWTP upgrades. The Tullow WWTP upgrade is currently at construction stage with anticipated timeframe for completion in Q4 2023. The Muinebeag/Leighlinbridge WWTP upgrade is slightly further behind the Tullow upgrade but with anticipated timeframe for completion in Q1 2024.

Otherwise, currently it is envisaged that capacity is available to cater for the population targets identified in Table 2.7 for Carlow town, as well as for all of the smaller towns. At the lower end of the settlement hierarchy, there are constraints in three of the larger serviced villages; IW has recently announced funding for the provision of a WWTP upgrade at one of these villages, Ballinabranagh, under the STVGP. See Section 8 and Table 1 for further details.

Wastewater networks:

Drainage Area Plans (DAPs): A DAP for Carlow town will commence in Q1 2022. The DAP will assess in detail the performance of the wastewater networks in the town. Irish Water will keep Carlow County Council updated on progress with the DAP as the development plan process progresses.

In parallel with the DAP, a Strategic Network Development Plans is being progressed for Carlow. This a high-level study that will help inform how undeveloped zoned sites within the town could be serviced. Irish Water will engage with Carlow County Council to ensure that planned growth in the strategic growth areas is taken account of in these studies.

As a final note, Irish Water and Carlow County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, etc, and Irish Water and Carlow County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

10. Water Infrastructure in Carlow:

Water treatment/source capacity:

There are 9no. water resource zones (WRZ) in Carlow County. The attached Table 1 provides capacity updates for each settlement listed in the Core Strategy Table 2.7 and identifies that it is envisaged that capacity is available in the water resource zones to cater for the population targets identified in the Draft County Development for all except Tinnahinch. Tinnahinch is served from the Graiguenamanagh water resource zone and capacity constraints in that WRZ are being reviewed through the NWRP full options assessment process with a preferred approach anticipated in Q3 2021.

Water Networks:

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

11. General Comments

Some general comments and updates on sections of the Draft CDP are outlined below: -

| Draft CDP Chapter/Section Number: | Amendment/suggested update: |
|---|--|
| Chapter 6, Section 6.4 Wastewater Treatment – Commercial and Tourism uses | IW welcomes the provision of WT – P2 in relation to the intention to prohibit the use of shared wastewater treatment systems for new multi house developments in unserved rural areas. In relation to WT-P1 IW would draw the Council's attention to Section 5.3.1 of the Draft Water Services Guidelines for Planning Authorities which states:- <i>'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.'</i> |
| Chapter 6, Section 6.5 | IW welcomes the inclusion of policies to support surface water drainage management and in particular the requirement for the provision of SuDS by all developments. IW would also like to draw the council's attention to our menu of objectives (attached), and specific objectives which we would like to see included in the Development Plan as follows: |

| | |
|---------------------------------|---|
| | <p>Suggested objectives:</p> <ul style="list-style-type: none"> • To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water; • to ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure; • to require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm; |
| <p>Chapter 6, Section 6.1.1</p> | <p>In the first paragraph in this section, reference is made to the 9no. water resource zones which serve the county, but it is also stated that <i>'The main water source is surface water abstraction from the River Burren and River Slaney'</i>. It should be noted that the water sources for the 9no. water resource zones varies from WRZ to WRZ and they are not solely confined to abstraction from the River Burren and River Slaney.</p> |

12. 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.

We look forward to engaging with Carlow County Council and providing regular updates on Irish Water activities as the Development Plan preparation progresses.

Yours sincerely,

IW Forward Planning Department.

Attached:

Menu of Policy Objectives for Development Plans

Table 1 – Water and Wastewater Capacity Update September 2021