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Ref: P190205 IW_Response_NWRA_Draft_RSES

Re: Response to the Northern and Western Regional Assembly regarding the Assembly's consultation on their Draft Regional Spatial and Economic Strategy

Dear Mr. Minton,

Irish Water welcomes the opportunity to engage with the Assembly in regard to the development of the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region. As the single national provider of public water services in Ireland, we understand the importance of engaging with you to ensure that the objectives of the National Planning Framework and the Regional Spatial Planning and Economic Strategy can be implemented.

We would like to commend the Assembly Executive Team and Elected Members on the high quality and standard of the Draft RSES. The Draft sets out a clear vision for the Northern and Western Region in line with the objectives of the National Planning Framework at Regional level.

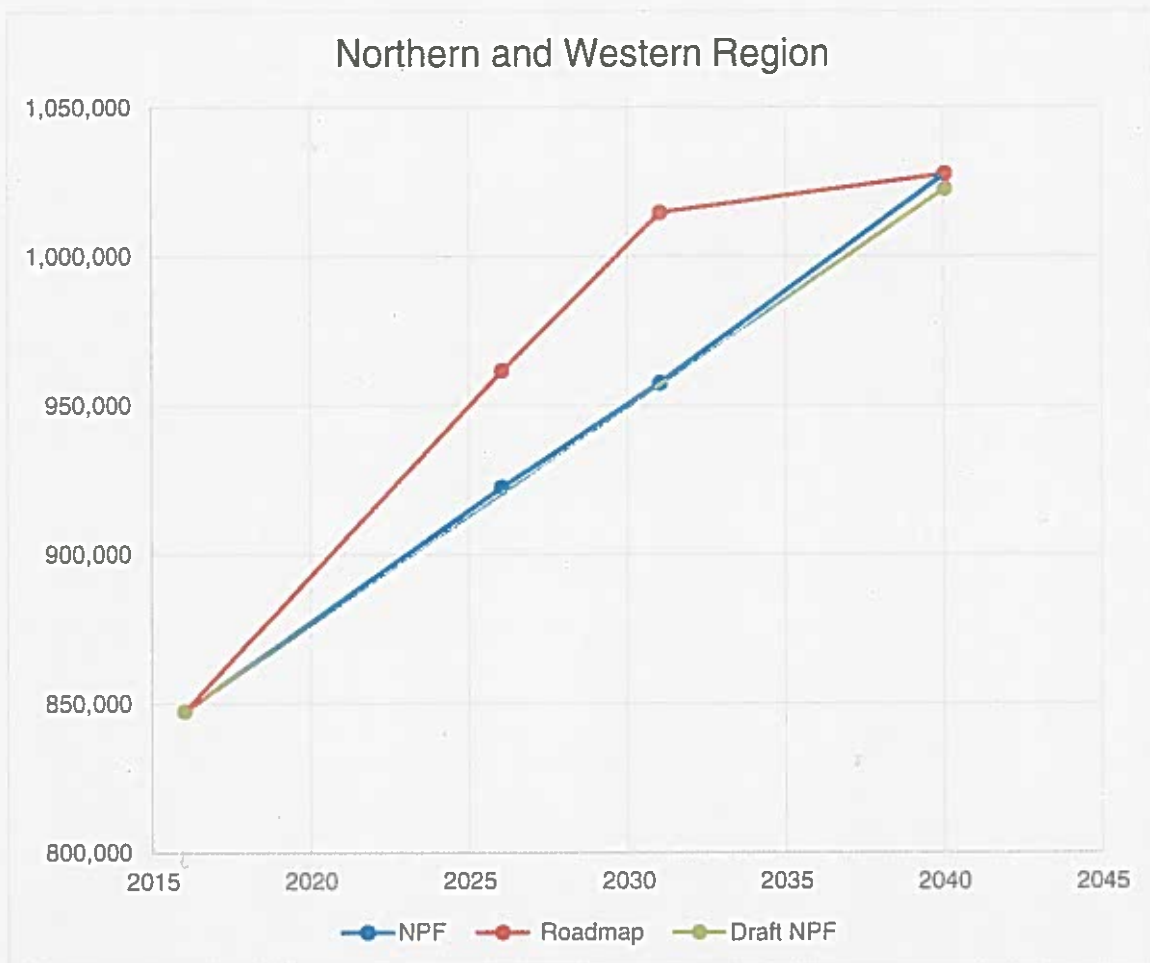
Having read the Draft RSES, we welcome your inclusion of our previous comments at "Issues Paper" stage and in subsequent correspondence including:-

- National Water Resources Plan;
- Drainage Area Plans;
- Compliance with relevant environmental legislation;
- Inclusion of some of our key strategic projects.

As many of our observations have already been addressed, we only have a few further comments to submit for consideration.

CHAPTER 4 – PEOPLE AND PLACE (Population Projections)

- (1) We note the RSES population projections given in Section 1.9 align with the ‘transitional’ projections in the Implementation Roadmap for the NPF as set out by the DHPLG in July 2018. Comparing these projections with the National Planning Framework projections, these indicate a steeper growth gradient for the first 10-15 years of the plan, and include a certain amount of “headroom”. They are also higher than the projections indicated in the Draft NPF (see graph below). Irish Water’s Investment Plan (2020-2024) is currently based on Draft NPF figures which did not include headroom or ‘transitional’ population projections.



- (2) Once the RSES is confirmed and Local Authorities identify core strategies in their new Development Plans, Irish Water will review growth projections for projects identified in its 2020-2024 Investment Plan which is currently with the CRU for approval.

Early notification of the L.A. core strategies is of utmost importance in order for Irish Water to ensure its Investment Plan can fully support the Regional Strategy. If any changes need to be made to the Investment Plan, after submission to the CRU, based on this new information, we will agree this change process with the DHPLG and CRU.

- (3) National Planning Framework Policy 7a, gives a national average growth figure of 20-25% to the year 2040. The 2031 population targets for Athlone in the EMRA and NWRA Draft RSES's are different. The 2016 census population figure for Athlone on page 59 of the RSES is 25,000 whereas this figure is 21,349 according to www.cso.ie. We would welcome clarification on these points in the final RSES.

The estimate of the load into Monksland WWTP has recently been revised upwards, leading to a reduction in available capacity for growth. Investment is likely to be required to ensure that adequate capacity for the projected growth can be provided. For the purposes of proper planning of water services infrastructure, Irish Water requests to be notified of the final agreed population targets and distribution across county boundaries as soon as is practicable. The last sentence on page 283 of the draft RSES may need to be updated as a result.

SECTION 3.6 – DELIVERY OF COMPACT GROWTH

- (1) Section 4.1.5 addresses the wastewater network in Sligo City. The network's ability to accommodate current and future demands will be assessed in the Sligo Drainage Area Plan, which is expected to commence later this year. In addition, a network bottleneck at Knappagh Road is currently being addressed under the Local Network Reinforcements Project. We note that there is no public wastewater infrastructure in Ballincar or Cregg however, there is a WWTP serving Rosses Point and there is a project underway to resolve the capacity issues at the plant.

SECTION 8.5 – WATER SERVICES INFRASTRUCTURE

- (1) In order to meet the population growth targets outlined it is likely that a number of significant water services infrastructure projects as well as intensive water conservation activities will need to be progressed within the timescale of the RSES to support planned development and maintain and improve existing services in key settlements. Irish Water welcomes the NWRA's support of the Irish Water Strategic Water and Wastewater Projects listed in Section 8.5. These are of utmost importance to the long term sustainable development across the whole Northern and Western region.
- (2) We would like to request the amendment of text in Section 8.5 as follows;

FROM THIS	TO THIS
<p>[Pg 282, 4th para.]</p> <p><i>Irish Water is developing a National Water Resources Plan (NWRP) which will outline their strategy to secure sustainable supply over the next 25 yrs.</i></p>	<p><i>Irish Water is developing a National Water Resources Plan (NWRP) which will outline their strategy for moving towards a secure and sustainable supply over the next 25 years.</i></p>
<p>[Pg 284, 1st para.]</p> <p><i>Irish Water is currently developing Drainage Area Plan for the urban centres in the region. These are necessary to co-ordinate growth and capacity provision and to implement RBMP, UWWTD and discharge licences. The</i></p>	<p><i>Irish Water is currently developing Network Development Plans (NDPs) and Drainage Area Plans (DAPs) for the urban centres in the region. These are necessary to co-ordinate growth</i></p>

<p><i>plans are prioritized and currently Galway City, Monaghan and Monksland are in preparation. The issue of dealing with combined sewers and their impacts should be incorporated into the DAP in collaboration with the local authorities. The delivery of DAPs is a critical component of the compact growth models promoted in the NPF and the RSES.</i></p>	<p><i>and capacity provision and to implement the RBMP, UWWTD and discharge licences. The DAPs are prioritized and currently Galway City, Monaghan and Monksland are in preparation. The issue of dealing with combined sewers and their impacts should be incorporated into the DAP in collaboration with the local authorities.</i></p> <p><i>Network Development Plans will also be prepared for the water supply networks in the urban growth centres. Intensive water conservation measures such as leakage reduction will play a major role in ensuring adequate capacity for growth in the short term.</i></p> <p><i>The delivery of NDPs and DAPs are a critical component of the compact growth models promoted in the NPF and the RSES.</i></p>
<p>[Pg 284, list of projects]</p> <p><i>The projects outlined below are necessary to deliver the growth model outlined in the RSES.....</i></p> <p>Monksland WWTP Drainage Area Plan</p>	<p><i>The strategic projects outlined below are necessary to deliver the growth model in the major urban areas outlined in the RSES. Irish Water also have a number of local projects ongoing and planned throughout the North West..</i></p> <p>Monksland WWTP Upgrade and Drainage Area Plan.</p> <p>Add to list:</p> <p>National Leakage Reduction Programme</p> <p>Letterkenny Regional Water Supply Scheme</p> <p>Letterkenny Sewerage Scheme</p> <p>Sligo Drainage Area Plan</p> <p>Galway Metropolitan Area Wastewater Management Plan</p>

We would also like to note that significant investment will be required, not only for the projects listed on page 284, but also a large number of more local projects throughout the region. In order to support the RSES objectives and effectively plan infrastructure, IW needs certainty as to where, and when, demand will occur.

- (3) 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 us to prepare for the future and ensure that we can provide enough safe, clean drinking water to facilitate the social and economic growth of our country. A statutory public consultation will be launched in Q2 of 2019 seeking feedback on the draft National Water Resources Plan and associated draft SEA Environmental Report and draft Nature Impact Statement.
- (4) Compliance with the Water Framework Directive and the development of Drinking Water Protection Plans are of utmost importance for sustainable development of the region. We would recommend that an additional paragraph be added to Section 8.5. We suggest wording along the lines of the following:

"The Regional Assembly supports the development of Drinking Water Protection Plans in line with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, the Regional Assembly supports the inclusion of objectives in County Development Plans relating to the provision of mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans."

- (5) With regard to the NPF National Policy Objective 18b to 'Develop a programme for new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages supports the serving of rural villages (serviced site) as an alternative to one-off housing'. We suggest that the RSES includes appropriate guidance on this objective in terms of the selection of appropriate small towns and villages to host such homes. The selection of such rural villages should be carried out on an evidence based approach together with the appropriate environmental assessments to aid the selection. A set of criteria would perhaps aid Local Authorities in determining the suitable villages/settlements.
- (6) With regard to Infrastructural Assessments, National Planning Framework Objectives 72a-72c highlight the need for a standardised tier approach to zoning of land with infrastructural assessments and cost of delivery determined. We suggest that these objectives be reiterated within the document and also highlight the role of agencies in this. There is also a need for clear and concise guidance for the development of Infrastructural Assessments.

Yours faithfully,


Sean Laffey
Head of Asset Management.