



Teil/Tel: +353 (0)51 860700 Facs/Fax: +353 (0)51 879887
R-phost/Email: info@southernassembly.ie Idirlíon/Web: www.southernassembly.ie

National Water Resources Plan,
Irish Water,
PO Box 13216,
Glenageary,
Co. Dublin.

3rd March 2021

**Re: Submission to the Draft National Water Resources Plan (NWRP)
SRA File Ref: 21/001**

A Chara,

The Southern Regional Assembly (SRA) welcome the publication of the Draft NWRP and welcome the opportunity to make a submission on this important framework to provide a safe, secure, reliable and sustainable water supply in our Region for now and into the future.

The SRA acknowledge the references to the Regional Spatial and Economic Strategy (RSES) within the Draft NWRP. The delivery of water infrastructure, water quality and sustainable sources of supply are fundamental to achieve the National Strategic Outcomes of the National Planning Framework and the strategic outcomes of the RSES.

Section 8.1.1 of the RSES and Regional Policy Objectives (RPOs) 208 and 209 specifically seek and support the implementation of Irish Water Investment Plans, alignment of water services to objectives of the RSES and MASPs and implementation of the forthcoming NWRP.

In making this submission, the SRA acknowledge the iterative process of engagement with stakeholders in the NWRP process to date. The SRA facilitated workshops between Irish Water and Local Authorities in our Region in 2019 as part of the NWRP process. The SRA and Irish Water collaborated successfully during the preparation of the RSES. We look forward to continued consultation as Phase 1 of the NWRP is completed and in the preparation of Phase 2 Regional Water Resources Plans.

Engaging with the SRA as a key consultee in the preparation of Regional Water Resources Plans is of particular importance to the Assembly. Clarity on their regional boundaries, water catchments and preparation will assist the structures to implement the objectives of the RSES and Metropolitan Area Strategic Plans (MASPs) for Cork, Limerick-Shannon and Waterford. The Southern Region is included under all four of the upcoming Regional Water Resource Plans. Servicing the water infrastructure requirements of the Region to (retrofitting existing networks and future growth) protecting water quality and bringing strategic infrastructure projects to fruition are integral to the implementation of the RSES and MASPs.

This submission is at a high level, reflecting Phase 1 and the SRA will seek to engage on clarities and details for the Region under Regional Water Resource Plans Groups 1-4 as Phase 2 advances. There are a number of important recommendations at this stage, which we provide to assist strengthening the final NWRP from the Region's perspective. Our submission outlines:

- The context of the RSES and need to service our Region's ambition and growth.
- Recommendations No 1-4, focused on close collaboration with Local Authorities to deliver for their City and County Development Plan Core Strategies.
- Recommendation No 5 to support strengthened integration of Blue Green Infrastructure and Nature Based Solutions in "Supply Smarter" infrastructure planning.
- Recommendation No 6 to support capital investment through the NDP and Project Ireland 2040 to implement Irish Water's strategic investment plans and initiatives.

Section 1.0 Context of the RSES

The Region's priorities for investment are identified in the RSES and MASPs for Cork, Limerick-Shannon and Waterford which came into effect on the 31st January 2020. In line with the National Planning Framework (NPF) and the National Development Plan (NDP), they set a 12-year statutory strategic planning and economic development framework for future economic, spatial, and social development of Southern Region to become one of Europe's most "**Creative and Innovative**", "**Liveable**" and "**Greenest**" Regions.

The Southern Region has the State's most significant proposition to achieve the aim of Regional Parity. The NPF and RSES targets our three cities to grow by over 50% to 2040 as part of a structural realignment away from the Greater Dublin Area with a 50:50 distribution of growth between the Eastern and Midlands region and the Southern and Northern and Western Regions. Compact growth of at least 50% of all new homes that are targeted in the region's three metropolitan areas are to be delivered within their existing built up footprints and a corresponding target of at least 30% within all other settlements in accordance with NPF National Policy Objective 3b and 3c.

By 2040, the population of the Region is projected to rise to almost two million, requiring new homes and jobs. RSES Appendix 1, page 347 sets out Local Authority population projections to 2031, which combined deliver a projected uplift between 280,000 to 343,500 in the Region to 2031.

To accommodate this growth, the RSES recognises the strategic role played by all areas in achieving regional and national targets outlined in the NPF. Achieving such ambitious targets will require an equally ambitious alignment in funding priorities and service delivery. Water infrastructure is fundamental to service this growth.

The settlement strategy builds on the Region's three cities and metropolitan areas of Cork, Limerick - Shannon and Waterford as engines of growth supported by a network of 14 strategically located Key Towns namely Kilkenny, Ennis, Carlow, Tralee, Wexford, Clonmel, Killarney, Mallow, Nenagh, Thurles, Newcastle West, Clonakilty, Dungarvan and Gorey.

Regeneration and growth across our Region's Cities, Key Towns and further through its network of towns, villages and rural communities are supported to build an economically resilient, competitive and growing region.

Under RSES Section 3.2 Sustainable Place Framework and Table 3.2 Settlement Typology, the role and attributes of different locations in the settlement hierarchy of the Region are defined. The RSES sets specific targets for cities and metropolitan areas (50-60% to 2040 in line with the NPF, with projections to 2031 set in each MASP).

By summary, the RSES and MASPs set a framework for the sustainable growth of Cork metropolitan area by over additional 104,600 persons to 2031 (75,000 of which is in the city and suburbs). Growth

for the Limerick Shannon metropolitan area is targeted at over 39,700 additional persons (33,900 in the city and suburbs) in the same period. Growth for the Waterford is targeted at over 14,600 additional persons to 2031 (13,800 in the city and suburbs). Within the RSES, refer to population projection tables in Cork MASP page 244, Limerick-Shannon MASP page 286 and Waterford MASP page 323 for the breakdown of these targets and headroom allowances.

For Key Towns, Local Authorities are supported in targeting growth of more than 30% subject to capacity analysis and sustainable criteria under Section 3.3 A Tailored Approach. The appropriate level of growth is to be determined by the Core Strategies of Development Plans. Regeneration and growth is supported through towns, villages and rural communities as determined through the Core Strategies of Development Plans.

The RSES sets a framework to guide the sustainable plan-led distribution of growth under each City and County Development Plan. Section 3.3, “A Tailored Approach” requires an evidence-based approach for Core Strategies linking growth targets to clarity on existing infrastructure deficits, new infrastructure requirements and the timescale and plan to deliver these requirements, including water and wastewater infrastructure.

It is this regional policy context that supports the delivery of infrastructure under the NWRP. References to the final published RSES and the MASP for Cork, Limerick-Shannon and Waterford can be obtained through <http://www.southernassembly.ie/regional-planning/rses>

Section 2.0 Delivery of RSES & MASP objectives and Local Authority City & County Development Plan Core Strategies

It is important that the NWRP and Regional Water Resources Plans (Phase 2) service the Region’s growth trajectory as outlined in Section 1.0. Within our Region, 2021-2022 will be a key period for the completion of Development Plan process with one draft process completed (Wexford), one draft process current (Kilkenny) and the remaining eight Local Authorities due to commence draft or variation processes in the coming weeks and months.

As signaled in the Draft NWRP, it is recommended that Irish Water engage closely with each Local Authority in completion of Phase 1 NWRP and in the preparation of Regional Water Resources Plans Groups 1-4 in our Region during Phase 2, which will coincide with the completion and implementation stages of all newly adopted/varied Local Authority City and County Development Plans aligned with the NPF and RSES.

The following recommendations for both the completion of the NWRP (Phase 1) and Regional Water Resources Plans (Phase 2) in Irish Waters coordination with Local Authorities are made:

(1) Determine the detail of demand for water across urban and rural settlements, especially where significant levels of population and employment growth are targeted aligned with the objectives of the RSES and MASPs for infrastructure led regeneration and growth. It is also important to identify the water infrastructure needs for rural areas, inclusive of rural towns, villages and smaller rural settlements and fund infrastructure projects identified by Local Authorities at the local level to better support our rural communities and economy.

(2) Address on-going retrofitting and upgrades to the existing water supply networks to service existing the population and employment areas to a high standard and address current restrictions, capacity, quality and network efficiency issues where population and employment growth is targeted aligned with the objectives of the RSES and MASPs.

(3) Service the Core Strategies of each Local Authority City and County Development Plan in our Region, working in partnership with our Local Authorities to deliver on infrastructure led

planning for settlements at all scale including our cities, Key Towns, other towns, villages and smaller rural settlements to support infrastructure led regeneration, growth and resilience for all locations in our Region.

(4): Ensure that metropolitan areas, which are a statutory part of the RSES through the MASP for Cork, Limerick-Shannon and Waterford are given recognition within the NWRP in terms of their growth targets (city and suburbs and the total metropolitan area). Collaboration to plan services across Local Authority boundaries for each MASP will be required. A pro-active approach by Irish Water to deliver services for each MASP is a requirement of the RSES. While water demand for the cities is included in tables under the Draft NWRP, it is important that demand and need for coordinated infrastructure planning across metropolitan areas (city and suburbs, metropolitan towns, key growth areas) is identified and indicated in both the tables and narrative of the NWRP. The cities and metropolitan areas are at the top of the settlement hierarchy of the RSES. The growth trajectory of 50-60% to 2040 for each of the cities and suburbs is set in the NPF and RSES and infrastructure planning to the upper limit to ensure capacity is strengthened and our cities are future proofed for growth and resilient is recommended.

These recommendations align with RSES RPO 2 Planning for Diverse Areas, RPO 3 Local Authority Core Strategies, RPO 4 Infrastructure Investment, RPO 7-10 (infrastructure delivery and securing compact growth in cities and metropolitan areas), RPO 11 Key Towns, RPOs 12-25 (for each Key Town), RPO 26 Towns and Villages, RPO 34 Regeneration, Brownfield and Infill Development, RPO 35 Support for Compact Growth, RPO 68 Regional Investment, RPOs 111-112 Water Resources and Water Quality and RPOs 208-210 Water Supply.

In addition, these recommendations align with the objectives of the MASPs For Cork, Limerick-Shannon and Waterford which identify water infrastructure investment as a key enabler for growth in each city and metropolitan area (Cork MASP Objective 5 & 6, Limerick -Shannon MASP Objectives 4 and Waterford MASP Objective 3-4).

Section 3.0 Integration of Blue Green Infrastructure (GBI) and Nature Based Solutions (NBS) in “Supply Smarter” infrastructure planning

The RSES recognises the important role of integrating GBI and NBS as a key component of placemaking. Both are important in addressing the urgency of Climate Change and planning our settlements sustainability to reduce carbon emissions. A high-quality environment enhances our well-being and quality of life. It also offers a strategic competitive advantage in attracting enterprise and encouraging economic activity to our Region.

Surface water management should form an integral part of planning, regardless of scale. Climate change is already resulting in more frequent and intense rainfall, and the impact of this on urban areas is increased as infiltration rates are significantly less through hard surface areas compared to greenfield sites. Sustainable urban Drainage Systems (SuDS) to address flood risk are promoted in The OPW’s (2009) Guidelines for Planning Authorities “The Planning System and Flood Risk Management”.

More recently, a Nature Based approach to SuDS (or Natural Water Retention Measures) has come more into prominence, in response to the water, climate and biodiversity crisis facing the planet. Nature Based SuDS work with nature (rather than against it). This approach is promoted internationally by organisations such as the International Union for Conservation of Nature (IUCN) and supported by the EU’s Green Deal.

A nature-based approach can also improve water quality (e.g. can filter out >80% heavy metals), biodiversity (e.g., provide habitat for range of species) and Climate adaptation and mitigation (resilience, micro-climate cooling and carbon sequestration).

The Draft NWRP includes detailed content on developing solutions to strategic water management and supply, including measures for catchment management for ground and surface water sources. Positively, climate change is addressed but further strengthening is recommended to integrate GBI and NBS as a key design principle for water conservation and protection of water quality.

Irish Water have a leadership role in this field through their collaborations with Local Authorities and are currently a stakeholder with the SRA, Cork City, Waterford City and County and Limerick City and County Councils and other agencies on the Interreg Europe “Blue Green Cities” project (<http://www.southernassembly.ie/eu-projects/blue-green-city>). This project is seeking, through good practice learning in the EU and our Region, to improve policy making and the implementation of projects that integrate GBI and NBS at national, regional and local levels.

Support at a national level for such design tools as Sustainable Urban Drainage Systems, Rain Water Harvesting, Integrated Constructed Wetlands and incorporation of Ecosystem Services approaches to protect, conserve and enhance our natural water capital inter alia should be included and have prominence in the NWRP as priorities in developing solutions to water management, quality and supply needs (in Section 8.0 Developing Solutions especially).

The Draft NWRP should advocate for a cross agency and multi-disciplinary integrated approach to NBS and BGI. A Nature Based approach to SuDS should get particular attention. These elements must be incorporated into the early design stages and there needs to be a greater awareness and understanding of the techniques involved and their wide-ranging benefits. This will better utilize existing water management infrastructure and will help relieve constraints on combined drainage networks for urban areas. However, to better integrate national and regional policy into the Draft NWRP, the broader aspects of health and wellbeing, placemaking, biodiversity, water quality (inter alia) should also be appreciated.

Chapter 5 ‘Environment’ of the RSES recognises that the factors of environmental progress are assembled around local economic and social motivation. A good practice example of Upstream Thinking in the United Kingdom (UK) is cited in the RSES. This adopted an Ecosystem Services approach to tackle water quality problems at source which reduced the need for expensive water treatment solutions. There are strong benefits to cost ratios with modelling showing that a £10 million investment into catchment management could save £650 million in costs of treating nutrient and topsoil-laden water over a 30-year period (i.e. a benefit-cost ratio of 65:1).

Ecosystem Services are mentioned in Section 9.2 “*Options Assessment Methodology and Preferred Approach Development*”. This nature-based approach is also explained under existing initiatives in “*Source Protection and Catchment Management Activities*”. It is noted that these are essentially Ecosystem Services approaches but are not described as such in the text. Ecosystems Services will play an important role under the pillar of ‘Supply Smarter’ but it can be a difficult concept to grasp. It would therefore be useful for the reader to connect the Ecosystem Services approach to the initiatives cited e.g. Source to Tap Project and Pilot Drinking Water Source Protection Project. This will show the practical benefits of such an approach.

The following recommendation is made:

(5): Through the NWRP, integrate the use of Blue and Green Infrastructure (BGI) and Nature Based Solutions (NBS) as part of the Developing Solutions and Supply Smarter infrastructure measures and methodologies of the NWRP. Strengthened integration of GBI and NBS will accord with the three outcomes of the NWRP to Lose Less, Use Less and Supply Smarter. Nature Based SuDS and an Ecosystem Service approach should be strongly advocated and elaborated upon.

This recommendation aligns with RSES RPO 111 Water Resources, RPO 112 Water Quality, RPO 122 Sustainable Drainage Systems (SuDS), RPO 124 Green and Blue Infrastructure, RPO 125 Green and Blue Infrastructure Corridors, RPO 126 Biodiversity, RPO 110 Ecosystem Services, RPO 200 Green and Blue Infrastructure and Recreation and RPO 218 Sustainable Urban Drainage (SUDs)

Section 4.0 Capital investment to implement Irish Water’s Strategic Plans and Initiatives.

Water infrastructure is a key service in the suite of integrated infrastructure project and investment packages that need to be delivered to service our settlement hierarchy and to enable all places to fulfil their potential.

The SRA recognise the need for significant levels of capital investment to meet the outcomes of the NWRP and to service the outcomes of the NPF and RSES. The following core recommendations in summary were made to the Department of Public Expenditure and Reform (DEPR) in our recent submission on the review of the National Development Plan.

- Invest in infrastructure packages and placemaking initiatives for sustainable urban and rural communities.
- Support the achievement of growth targets, delivery of housing and enabling infrastructure on key sites that contribute to compact growth targets in the Cork, Limerick-Shannon, and Waterford Metropolitan Areas:
- Support the delivery of housing and enabling infrastructure on key sites that contribute to compact growth targets in the Key Towns of the Southern Region:
- Develop serviced sites within rural towns and villages.
- Deliver placemaking initiatives and infrastructure packages for enterprise growth.
- Strengthen Biodiversity, Green and Blue Infrastructure in the Southern Region:

Further, specific support to Irish Water’s strategic investment plans to be funded through the NDP in our submission stated:

- **“Invest in water resources and infrastructure led growth:** The NDP needs to support Irish Water, Local Authorities, other stakeholders, and communities with funding to service all settlements at different scales within settlement hierarchies with sustainable water and waste water infrastructure services to underpin growth projections, enable compact growth and regeneration, to protect our water quality and the environment. Strengthened funding to deliver strategic infrastructure projects under Irish Water Investment Plans to service the settlement hierarchy is critical, including funding for rural water and wastewater projects to enable regeneration and serviced site initiatives in rural towns and villages. Strengthened integration of Green Infrastructure and Nature Based Design Solutions to water and drainage infrastructure also needs to be supported. This priority aligns with and achieves RSES Regional Policy Objectives 208-218”.

In the context of the NDP review and need for Irish Water investment plans to be funded and implemented, the final NWRP should comment on implementation and funding structures where possible. It should comment on the commitment needed by Government through the NDP and its successors, Project Ireland 2040 and other potential sources (such as European Funding Programmes and funding priorities under the EU Green Deal) to secure funding for essential water infrastructure services that are needed to deliver on the NPF and RSESs.

Collaboration with Local Authorities to provide the evidence base of services needed, both retrofitting existing networks and servicing growth, on a settlement and area basis, need to inform capital

investment decisions by Government and are encouraged. A proactive demonstration of the urgent case for more capital expenditure towards essential water services in the Regions to deliver on NPF, RSES, MASP and City and County Development Plans and a strong business case (cost benefit ratios and/or similar justifications) would strengthen the NWRP and especially the Regional Water Resource Plans under Phase 2.

This will ensure the evidence-based and business case justification for investing in essential water services infrastructure in our Regions can be shared and supported by all stakeholders tasked to implement and deliver the strategic outcomes of the NPF and RSES and who advocate for infrastructure investment in our Regions.

The following recommendation is therefore made:

(6) Work with Local Authorities in partnership in confirming the evidence base on the need for water services investment as a critical infrastructure servicing the NPF, RSES, MASPs and City/County Development Plans. This partnership approach needs to inform Government Departments, DEPR for the NDP Review and the Project Ireland 2040 Delivery Board, on the justification and business case to fund water infrastructure investment to the levels required (retrofitting and growth) in the Regions.

This recommendation is in accordance with RSES RPO 4 Infrastructure Investment, RPO 7-10 (infrastructure delivery for MASPs), RPO 68 Regional Investment, RPO 175 Infrastructure-led Planning, RPO 227 Funding and RPO 228 Smart Growth Initiatives.

Conclusion

The SRA welcome this consultation opportunity with Irish Water on the NWRP and are a committed stakeholder and key consultee for Irish Water under the final NWRP, it's implementation and for clarity on the boundaries, water catchments and preparation processes of the forthcoming Regional Water Resources Plans. Continued engagement between the SRA and Irish Water on these phases is encouraged and will be welcomed.

I trust the above recommendations can be taken on board to help strengthen the final NWRP from the Region's perspective. The SRA would welcome the opportunity to engage with Irish Water on these recommendations and are available for future consultation and clarities as required.

Mise le meas,



David Kelly,
Director