

RSES Material Amendment Submissions,
Southern Regional Assembly,
Assembly House,
Waterford.

Uisce Éireann
Bosca OP 448
Oifig Sheachadta na
Cathrach Theas
Cathair Chorcaí

Irish Water
PO Box 448,
South City
Delivery Office,
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11th October 2019.

Re: Public Consultation on the Material Amendments for the Draft Regional Spatial and Economic Strategy for the Southern Region

Dear Sir/Madam,

Irish Water welcomes the opportunity to engage with the Southern Assembly (SRA) with regard to the public consultation stage for the Material Amendments to the Draft Regional Spatial and Economic Strategy (RSES) for the Southern Region.

We have reviewed the Material Amendments and would like to suggest some amendments/updates as outlined in Table 1 below.

In addition, we would like to draw your attention to our recommended responses/amendments which we submitted during the Draft RSES public consultation stage and we would request further collaboration ahead of the completion of the final draft to ensure Irish Water’s recommended responses/amendments are taken into account.

In that regard, we have further (minor) updates to submit now in relation to the National Water Resource Plan (NWRP) as follows:

Chapter 8, Section 8.1.1:-	
Text in Draft RSES:	Recommended text (with update Oct 19 highlighted in red below):
[Pg 186, Section 8.1.1.] <i>Irish Water is currently preparing a National Water Resources Plan (NWRP) which will evaluate water resources nationally and will set out how Irish Water intends to maintain the supply and demand for drinking water over the short, medium and long-term whilst minimising impact on the environment.</i>	<i>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</i>

<p><i>The plan will identify, develop and assess options for a number of high priority water supplies to help meet potential shortfalls and minimise environmental impacts. Post 2018, Irish Water will continue to identify, develop and assess options for the remaining water supplies. In addition, a works programme will be rolled out to implement mitigation measures.</i></p>	<p><i>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 2020 seeking feedback on the draft National Water Resources Plan and associated draft SEA Environmental Report and draft Natura Impact Statement.</i></p>
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Our recommended responses to the Material Amendments are included below in Table 1:-

Table 1 – IW responses to selected Material Amendments:-	
MA no. and relevant text:	IW response/recommendation:
<p>MA no. 8:-</p> <p>The following text has been added as point (l) of RPO 9:-</p> <p><i>In order meet the increased demands on the water supply and prevent adverse impacts on the integrity of water dependent habitats and species within the Natura 2000 network, due consideration should be given to the suitability of new and/or existing drinking water sources e.g. hydromorphological pressures.</i></p>	<p>This will be covered in the National Water Resource Plan, details outlined above, and further information will be available during the public consultation stage of the Draft NWRP in 2020.</p> <p>Thus IW would recommend the addition of the following text to MA no. 8:</p> <p><i>The National Water Resources Plan (NWRP) will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding our environment.</i></p> <p>We would also draw your attention to RPO 202 which is an objective to support Drinking Water Protection Plans.</p>
<p>MA no. 96:-</p> <p>The following text has been added as point (b) of RPO 200:-</p> <p><i>Seek Investment Plans for water services to plan for and address seasonal pressures on critical service infrastructure (such as from tourism), climate change implications (droughts, storms, flooding) and seek active measures to reduce leakage.</i></p>	<p>IW advises that the text ‘seek investment plans’ is ambiguous since IW prepares one investment plan on a five year cycle, and the Draft Investment Plan 2020-2024 is currently being finalised.</p> <p>IW would suggest the additional wording in the MA is deleted since IW takes into account seasonal pressures, climate change implications, and leakage reduction in the design of all relevant projects.</p>
<p>MA no. 97:-</p> <p>Test has been added to the last two lines of RPO 203 in the Draft RSES text (amendment written in red below):-</p> <p><i>It is an objective to seek Irish Water to revise the Draft Investment Plan (2020-2024), and subsequent investment plans, to align the supply of waste water treatment facilities</i></p>	<p>Similar to the above for MA no. 96, IW would suggest the text in red is removed, since seasonal pressures are considered in IW infrastructure upgrades as part of the design phase of each relevant project, and the wording ‘seek investment plans’ is ambiguous.</p>

<p><i>with the settlement strategy and objectives of the Southern Region RSES, and Metropolitan Area Strategic Plans for Cork, Limerick Shannon and Waterford and seek Investment Plans for waste water and treatment to plan for and address seasonal pressures on critical service infrastructure (such as from tourism).</i></p>	
<p>MA no. 98:-</p> <p>Text has been added to the last sentence of RPO 205 in the Draft RSES text (amendment written in red below):-</p> <p><i>It is an objective to support investment in the sustainable development of rural waste water treatment programmes and supports the initiatives of Irish Water, Local Authorities, communities and developers in small rural settlements to identify sustainable solutions subject to available funding for such services. Services for towns and villages that currently have no wastewater infrastructure will be prioritised in investment plans.</i></p>	<p>IW acknowledges and agrees with RPO 205 as outlined in the Draft RSES, however, in relation to the last sentence in red which is now the subject of the material amendment, IW wishes to advise that in relation to the servicing of unsewered villages, it may be more appropriate to fund these from the Rural Regeneration and Development Fund of the NDP. IW as a regulated utility has funding constraints and needs to prioritise investment. However, IW is committed to working with stakeholders and to provide technical support to establish the most cost effective and robust solutions.</p> <p>Therefore, IW recommends deletion of the last sentence in MA no. 98, in so far as it relates to IW investment plans.</p>
<p>MA no. 126:- Amendments and additions to Section 4.2 of the Limerick Shannon MASP.</p>	<p>IW acknowledges that National Policy Objective 68 has been identified in MA no. 126 as being relevant in the Limerick Shannon MASP context; i.e. the enabling of up to 20% of the phased population growth targeted in the principle city and suburban area, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan Area.</p> <p>In this regard IW recommends that the following text be included in this section 4.2:</p> <p><i>Advance notice of such planned growth to be provided in order to allow IW to plan for any upgrades needed in these areas.</i></p>
<p>MA no. 139:- Amendments and additions to Section 4.2 of the Waterford MASP.</p>	<p>As above for MA no. 126, IW acknowledges that National Policy Objective 68 has been identified in MA no. 126 as being relevant in the Waterford MASP context; i.e. the enabling of up to 20% of the phased population growth targeted in the principle city and suburban area, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan Area.</p> <p>In this regard IW recommends that the following text be included in this section 4.2:</p>

	<p><i>Advance notice of such planned growth to be provided in order to allow IW to plan for any upgrades needed in these areas.</i></p>
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Irish Water is available to discuss the Draft Regional Spatial and Economic Strategy, along with the Material Amendments to same, and any other issues with respect to the provision of water services within our remit. We look forward to engaging with the Southern Assembly in the future.

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Yours Sincerely,



Sean Laffey

Head of Asset Management.