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20_IW_FP_44_OCC_Draft-CDP

Re: Draft Offaly County Development Plan 2021-2027

Dear Sir / Madam,

Irish Water (IW) welcomes the opportunity to comment on the Draft County Development Plan for Offaly, 2021-2027 and acknowledges the work which has been accomplished to produce these documents. Chapter 11 of the Draft CDP lists the Policy Objectives in relation to Water Services Infrastructure, which are very comprehensive. Irish Water welcomes Offaly's commitment to working alongside IW in delivering these policies. The following are our comments and observations: -

Irish Water Investment Plan (Revenue Control Period 3) 2020 to 2024

The IW Investment Plan sets out Irish Water's budgetary proposals from 2020-2024 in line with 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.

The Draft Investment Plan has now been approved by Irish Water's regulator the Commission for the Regulation of Utilities (CRU). Further information on the current plan submitted for approval can be found on the CRU Website www.cru.ie. Now that the Draft Investment Plan has been approved, work has commenced internally in IW to review it and to align it with Irish Water's Strategic Funding Plan and our work plans and programmes. We will keep Offaly County Council informed of this process

Chapter 2 - Core Strategy, Settlement Strategy & Housing Strategy

Chapter 2 - Core Strategy, identifies *Principles of Growth* including Compact Growth, Infill / Brownfield, sequential development and serviceable zoned land, among other things. Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and the adopted Eastern and Midlands Regional Spatial and Economic Strategy (RSES) and we are committed to ensuring that we support the policies therein, where they relate to water services provision, while still ensuring we adhere to our budgetary constraints and other responsibilities.

Having looked at the proposed population targets in the core strategy table in 2.1.7, we would like to make the following observations in relation to water services infrastructure.

Wastewater Infrastructure

Waste Water Treatment Capacity

The County is served by a large number of wastewater treatment plants. Available capacity at any plant varies daily. Where there are constraints, applications for developments are on a first come, first served basis. If no project is associated with a constrained area, then any infrastructure will be developer led. Irish Water can work with developers to form the best solution for a particular site. This would be through the Connections and Developer Services section of Irish Water's website. <https://www.water.ie/connections/developer-services/>

The table below gives a snapshot of capacity of some of the larger settlements.
(Note these are subject to change).

Settlement	Census Population (2016)	Proposed Population Uplift	Waste Water Treatment Capacity
Tullamore	14,607	4,853	There is sufficient headroom to accommodate the estimated uplift population. However, some capital works may be required if the full target is reached.
Birr	4,370	1,263	Proposed population uplift may be a little high. There is currently headroom for a maximum of 300 houses / 900 persons
Edenderry	7,359	368	There is little headroom at present. However, this will be increased on completion of proposed project.
Portarlington	-	89	This should be feasible.
Banagher	1,760	317	There is sufficient headroom to accommodate the estimated uplift population
Clara	3,336	534	There is sufficient headroom to accommodate the estimated uplift population
Daingean	1,077	172	Proposed population uplift is a little high. There is currently headroom for circa. 30 houses / 90 persons.
Ferbane	1,191	214	There is sufficient headroom to accommodate the estimated uplift population
Kilcormac	935	155	There is sufficient headroom to accommodate the estimated uplift population
Rural Villages	-	954	There is reasonable capacity in most rural villages with an IW treatment plant. With the exception of Rahan and Walsh's Island.
Sraids & Open	-	320	N/A

Waste Water Networks

There are some constraints in sewer networks in various locations around the county, depending on size and scale of proposed developments. Infrastructure will have to be assessed on a case by case basis. As above, developers should enquire through the above web link.

A Drainage Area Plan (DAP) is currently being prepared for the Key Town of Tullamore. This study will model the existing sewer network / future scenarios and develop solutions to overcome the current constraints. IW are working with OCC staff to complete the Plan is currently in stage 3 of 4. IW will start to develop concept designs for the noted constraints such as flooding, pollution and Trunk Sewer capacity upgrades.

Separate to this plan Irish Water are developing an additional Infrastructure Development Plan. This will assess all the zoned land in the Tullamore catchment and develop a flow profile from each site. This will identify the requirements to allow the site to develop and connect to the trunk network. The output of this study will outline any upgrades in the network as a result of the flow from each parcel of land individually and communally. The infrastructure development plan is expected to be completed in December 2020.

Irish water have also started the design of the proposed Southern Interceptor Sewer which is following the latest LAP. This will inform requirements of Trunk infrastructure required to be co located within new roads and how the flow will be connected to the existing system and to the WWTP.

Irish Water and the Council are continually progressing sewer rehabilitation activities, capital maintenance activities at pump stations, storm water over flow assessments county wide. 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.

Water Infrastructure

The National Water Resources 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.

Water Supply for Offaly

Offaly's water supply is serviced by a number of Water Supply Zones. Some are at or near capacity and constrained for winter critical periods (freeze thaw events) and dry year critical periods (drought events).

Where there are constraints, the availability of water will be on a first come, first served basis with priority given to domestic customers. Non-domestic developments will be asked to review

their proposals to reduce water requirements. In the meantime, **leakage control and water conservation will be of utmost importance.**

Settlement	Census Population (2016)	Proposed Population Uplift	Water Supply Capacity
Tullamore	14,607	4,853	Very Limited / Constrained
Birr	4,370	1,263	Limited Water Supply
Edenderry	7,359	368	Very Limited / Constrained
Portarlington (OCC)		89	Very Limited / Constrained
Banagher	1,760	317	Adequate Supply Available
Clara	3,336	534	Adequate Supply Available
Daingean	1,077	172	Limited Water Supply
Ferbane	1,191	214	Adequate Supply Available
Kilcormac	935	155	Limited Water Supply

The National Water Resources Plan will outline the longer term plan for Offaly and some of the works will be progressed to improve the existing network in the area. The National Water Resources Plan is due to be published for consultation early in 2021

Water Networks

Irish Water and Offaly County Council are continually progressing leakage reduction activities, mains rehabilitation activities and lead replacement activities. These are prioritised based on leakage rates, water quality issues and ongoing disruption to Customer's supplies. Irish Water and Offaly County Council will continue to monitor the performance of the network to ensure that the most urgent works are prioritised as required.

Chapter 11 - Water Services & Environment

Section 11.2 – Water Services

2nd bullet point – the National Water Resources Plan will go out for public consultation early in 2021.

4th bullet point – the Capital Investment Plan – The CRU has approved the RC3 Revenue Control (2020-2024), with supporting RC3 Investment Plan in August 2020.

Section 11.3 – Water Services Policies

Irish Water welcome the inclusion of suggested policies submitted at the Issues Paper stage.

Section 11.4 – Water Services Objectives

Irish Water welcome the objectives set out in this section but would like to comment on two, WSO-03 & 04.

WSO-03 Response: IW welcomes this policy. However, the WSP is for the benefit of the whole of the region. We suggest the deletion of the words from “and to ensure” to the end of the sentence.

WSO-04 Response: RPO 10.9 of the RSES is not quite correct. The WSP will not result in significant redundant water sources nor spare capacity. WSP is required to meet existing and projected water demand for the region and will provide a secure and reliable water source to facilitate domestic and economic development. WSP represents a long term, strategic investment, and will support future economic development. It is noted that the servicing of permitted development is an obligation of Irish Water and will be addressed in Irish Water’s forthcoming National Water Resources Plan.

We suggest the wording of this objective is changed to the following: -

“Local Authorities and Irish Water should work together to ensure that future development and required water infrastructure are aligned, with Irish Water’s National Water Resources Plan a critical component in this”

11.5.1 Water Quality (River Basin Management Plans)

The European Union Water Framework Directive (WFD) (2000/60/EC) and the subsequent River Basin Management Plan (RBMP) set the objectives for managing waterbodies in our natural environment from abstraction to final discharge. The RBMP drives a programme of measures to deliver a more considered and balanced approach to the water taken from the environment and any potential impacts arising. The RBMP sets the constraints around our existing abstractions including any measures that may need to be undertaken to reduce the environmental impacts on these existing sources. The RBMP will influence from where, in what quantities, and under what conditions we can abstract water for the public water supply. It will also set the legislative framework for the new abstraction legislation within which any new abstractions we develop must conform. The new regulatory regime, which is required to meet the requirements of the WFD (2000/60/EC), will inevitably result in modifications to the way that we currently abstract from our individual water sources. However, as public water supplies have evolved based on these existing water sources, it will take numerous investment cycles before we have an integrated supply system that is truly environmentally sustainable. Once the new abstraction legislation and regulations are in place, we will work with the EPA to transform our public water supplies on a prioritized basis over time.

The National Water Resources Plan is being used to identify deficiencies and need across all public water supplies and to develop plan level capital and operational solutions to address these water services issues. The requirements of the WFD are an integral component of the NWRP assessment process with regard to ecological flows, water quality status and hydromorphology

Irish Water supports the RBMP Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive characterisation activities. Irish Water are members of Water Policy Advisory Committee, National Technical Implementation Group, and Regional Operational Committees. Irish Water work 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, we support the Local Authority Waters Programme (LAWPRO) desktop studies and local catchment assessment work with the provision of data. 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.

11.7 Environmental Objectives

ENVO-03 (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.

Irish Water is committed to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources. Good examples of where Irish Water is working in partnership with other stakeholders to protect drinking water quality are the National Pesticides and Drinking Water Action Group (NPDWAG), as well as catchment-specific NPDWAG Catchment Focus Groups. Irish Water is 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.

Yours Sincerely,



Niamh McDonald

Asset Strategy & Sustainability
Regional Forward Planning Specialist (East and Midlands)