

Wicklow County Council
Forward Planning Section
Planning & Environment
County Buildings
Wicklow Town

26/08/2021

Re: Response to Wicklow Draft CDP 2021 - 2027

Dear Sirs,

Irish Water (IW) welcomes the opportunity to comment on the Draft County Development Plan for the period 2021-2027. We note, and welcome, the inclusion of many objectives in Chapter 13 of the Draft CDP that will support the delivery IW plans, programmes and policies. These policy objectives will also ensure the sustainable management of water and waste water in line with national and regional objectives, as stated in the National Planning Framework and the Regional Economic Spatial Strategy for the East and Midlands Region.

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 further updates become available.

Our submission is set out as follows:

- National and Regional Policy
- General Updates on IW Plans and Programmes
- Proposed Core Strategy & Availability of Water Services
- Other Policies
- General Comments

National and Regional Policy

EMRA Regional Spatial and Economic Strategy

Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and the adopted East and Midlands Region Regional Spatial and Economic Strategy (RSES) and we are committed to supporting the policies therein, subject to budgetary and environmental constraints. In this regard we would draw your attention to Section 10 of the RSES which provides general policy direction in relation to the sustainable management of water.

General Updates on Irish Water National Plans and Programmes

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

Irish Water's Investment Plan is the budgetary plan for the five year period from 2020 to 2024 inclusive, in line with our strategic objectives as detailed in the Water Services Strategic Plan (WSSP). It sets out where we are continuing to invest and prioritise where we can deliver the most urgently needed improvements to drinking water quality, leakage, water availability, waste water compliance, efficiencies and customer service. 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 list of projects and programmes included in our Investment Plan is continuously being refined and is subject to budget, technical and environmental constraints, as well as statutory approvals. Further information can be found on the CRU Website www.cru.ie

The National Water Resources Plan (NWRP)

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.

Proposed Core Strategy and Availability of Water Services

Wastewater Infrastructure

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 waste water 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. (This could be highlighted in Chapter 13 of Draft CDP)

The County is served by 38 wastewater treatment plants. Available capacity at any plant varies daily. Where there are constraints, applications for developments would be 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/>

Wastewater Networks

Throughout the County, general capital maintenance upgrades are on-going through Network programmes based on needs. This includes rehabilitation of sewers, upgrades

to pumping stations, assessment of storm water overflows and installation of telemetry in line with national programmes.

- The Bray Drainage Area Plan (DAP) is near completion. Network Plans are being developed to service growth.
- A DAP will start in 2022 to cover Greystones, Kilcoole, Delgany & Newcastle.

Water Infrastructure

The National Water Resources Plan (NWRP) is carrying out a review of all WRZs in the country to determine projects to resolve deficits on a nationwide scale. For WRZs where we have deficits leakage control and water conservation will be of utmost importance and the availability of water will be on a first come, first served basis with priority given to domestic customers. Developers of non-domestic developments should review their proposals to see if they can maximise efficiency in their water requirements.

The North of the County (extending down to Wicklow town and across to Blessington) falls within the Water Supply Zone for the Greater Dublin Area and supply in the GDA is currently constrained. As stated above, the NWRP will address these issues.

The Water Supply Project (WSP), which is an in-flight project, still remains the project identified to deliver a 'new source' water supply for the Eastern and Midlands area. Whilst various analysis done to date continues to indicate that WSP is the preferred approach for the Eastern and Midlands Region, this will require review and confirmation in light of the NWRP (Framework and Regional Plans and associated statutory consultations and SEAs). Following the publication of the draft Regional Plan for The Eastern and Midlands Region (Group Area 4), the WSP will be reviewed, after which it is anticipated that WSP will be subject to further public consultation. Abstraction Legislation is expected to be enacted later this year, after which planning permission will be sought from An Bord Pleanála for the Strategic Infrastructure Project.

While it is envisaged that domestic development will not be inhibited by the above risks in the immediate future; it is likely that Irish Water will need to upgrade infrastructure to support growth in Wicklow over the Medium to Long term.

Proposed non-domestic developments and larger domestic developments will need to be assessed on a case by case basis, to determine how their additional demands can be supplied.

Commentary on Capacity of Infrastructure and Core Strategy

The table on the next page gives a snapshot of capacity of some of the larger settlements in relation to the proposed population targets given in the Draft Plan (*Note these figures are estimates and are subject to change*). There are constraints in the sewer networks in some settlements. Other areas, particularly if zoning changes are proposed, infrastructure will have to be assessed on a case by case basis. As above, developers should enquire through the above web link.

Settlement	Wastewater Infrastructure	Water Infrastructure
Level 1 - MASP Key Town		
Bray (Wicklow)	Wastewater Treatment (WWT) - can accommodate this level of growth. Sewer networks - a Drainage Area Plan (DAP) is near completion. Network Plans are being developed to service growth	Vartry Water Supply - Capacity Available. Note is in the GDA so will be dependent on solutions from the National Water Resources Plan in the longer term.
Level 2 - Core Region Key Town		
Wicklow / Rathnew	WWT - Can accommodate this level of growth (including Ashford)	Vartry Water Supply - Capacity Available
Level 3 - Self Sustaining Growth Towns		
Arklow	WWT - Project is committed & Ministerial approval is underway.	Arklow water supply - can accommodate this level of growth
Greystones / Delgany	WWT - Can accommodate this level of growth (including Newtownmountkennedy & Kilcoole). Sewer Network - a DAP to Start in 2022 to cover Greystones, Kilcoole, Delgany & Newcastle.	Vartry Water Supply - Capacity Available
Blessington	Will be able to accommodate this level of growth on completion of project	Blessington water supply - can accommodate this level of growth
Level 4 - Self Sustaining Towns		
Baltinglass	Can accommodate this level of growth	2 No. public wells supplemented by springs. Should be sufficient
Enniskerry	Can accommodate this level of growth	Should be sufficient capacity
Kilcoole	Can accommodate this level of growth	Vartry Water Supply - Capacity Available
Newtownmountkennedy	WWT - can accommodate this level of growth. Sewer network project is to advance.	Vartry Water Supply - Capacity Available
Rathdrum	Can accommodate this level of growth	Some Issues here - supply will need to be augmented

Level 5 - Small Town Type 1		
Ashford	(Covered by Wicklow Town)	Combination of water supplies. Should be sufficient
Aughrim	Cannot currently accommodate any development in Aughrim. However, a project is soon to commence under the Small Towns and Villages Growth Programme.	Alternatives may be required / a new link to Arklow WS
Carnew	Some issues at Carnew - limited capacity	Tinahely regional water supply scheme with water sourced from the Derry River north of Tinahely. This supply has capacity.
Dunlavin	Dunlavin - WWTP & Network Upgraded under recent CIP Project.	Improvements to this supply are required. May get funding through the Small Towns & Villages Growth Programme.
Tinahely	Modest capacity available	Served by the Tinahely Regional Water Supply Scheme. Has capacity.
Level 6 – Small Town Type 2		
Avoca	No capacity at Avoca Project planned. To be completed by 2024.	Capacity available
Donard	Capacity available	Capacity available
Kilmacanogue	(Covered by Bray)	(Vartry Supply) has capacity
Newcastle	Newcastle will be included in Greystones DAP.	(Vartry Supply) has capacity
Roundwood	Capacity available	Improvements to this supply are required. Funding has been sought under Irish Water's Small Town and Villages Growth programme. Not yet committed.
Shillelagh	Modest capacity available	Capacity available
Level 7,8,9 - Villages		
Villages & Rural Clusters	Laragh limited headroom & Ballyconnell no headroom	

Other Policies and Plans

Climate Change – Chapter 13 of Draft CDP

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.

Drinking Water Source Protection – Chapter 13 of Draft CDP

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 DWD.

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.

River Basin Management Plan – Chapter 13 of Draft CDP

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.

Sustainable Drainage and Green-Blue Infrastructure – Chapter 13 of Draft CDP

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.

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 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.

General Comments

Irish Water will be available to support the Council throughout the remainder of the County Development Plan Process.

Yours Sincerely,



Niamh McDonald

Asset Strategy - Forward Planning
East & Midlands Region