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**RE: Irish Water Submission to the DHPCLG in relation to the Draft National Planning Framework
“Ireland 2040 Our Plan” (Sept 2017)**

1.0 Introduction

Irish Water is responsible for the development, delivery, operation and maintenance of public water supply and wastewater services (water services) in the Republic of Ireland. The availability of adequate water services is essential for the social and economic development of the country and is a material consideration in the making of development plans and granting of planning consent.

Irish Water welcomes the publication of the Draft National Planning Framework and compliments the Government on the content and presentation of this policy document which will guide the spatial framework for future investment in water services throughout the country. We particularly welcome that the policy document will be backed by legislation ensuring that it will be implemented at a national, regional and local level thus providing a level of certainty on which to base future water services investment strategies.

We note the 5 key elements/messages of the policy, the Vision for Ireland in 2040 and the 10 Chapters in which the policy is detailed. The elements of the policy that are of particular relevance to Irish Water are (i) the spatial aspects of the National and Regional Development Strategy, (ii) Realising our Sustainable Future in relation to energy efficiency, climate change and managing national water resources sustainably, (iii) Implementation and Investment – ensuring certainty in the implementation of policies through Regional and Local Plans and the availability of funding for water services infrastructure to support the policies through to local level.

We acknowledge that many of the aspects of water services and environmental management that we raised in our submission to the Departments Issues and Choices paper of February 2017 have been addressed in the Draft NPF.

2.0 A New National and Regional Development Strategy for Ireland

Irish Water note the key elements of this new Development Strategy

- 1) Distribution of future growth to North West and Southern Regions to balance growth in the East and Midlands Region (3 Million population in NW & South, 2.8 Million M&E)
- 2) Focusing 50% of growth in 5 key cities
- 3) Growing 41 towns with populations greater than 10,000 population by 20 to 40%, with the towns in the North West to grow by 40%
- 4) Remainder towns, village and rural communities to grow by an average of 15% - to address rural decline
- 5) 40% of new housing to be focused in existing built-up areas – more compact form of urban development

Irish Water recognises the rationale behind this strategy and will endeavour to plan our water services infrastructure in line with this strategy. We note the ambitious growth targets indicated for the North West Region and for 5 key towns > 10,000 population in the North West Region (40% growth to 2040). In order to make the best use of available funding we will deliver water services infrastructure on a phased basis, balancing our investment in maintaining existing services and providing new services in line with emerging demand.

We also note that while the NPF indicates the broad strategy for growth at a national level the granularity of the strategy in relation to growth targets for individual settlements will be set in the RSEs and at county development plan level. We understand that the RSEs should be prepared by the end of 2018. We would urge the government to ensure that core strategies for all county development plans be updated in line with the NPF and RSEs as a matter of urgency so that Irish Water and other infrastructure providers can carry out investment planning based on up to date spatial planning targets at settlement level. Irish Water is currently preparing our Investment Plan for the period 2020 to 2025 and would welcome further granularity in relation to likely emerging demand for water services and the resultant need for investment to facilitate planned growth.

We welcome that the implementation of the NPF policies and targets and subsequently the policies and targets that will be set by the RSEs and County and Local Development Plans will be given legislative support through the planning system thus lending more certainty to infrastructure investment and delivery plans.

We note NPO 18a on page 68 and wonder if there is a typo in relation to “smaller towns >10,000. Should the NPO refer to small towns <10,000? We note NPO 17b in relation to developing new homes in small towns and villages providing serviced sites with appropriate infrastructure to attract people to build their own homes in small towns and villages. Irish Water support this policy subject to available funding for infrastructure providers but would suggest that this policy is implemented on a phased basis in priority small towns and villages to be identified in development plans on an on-going basis.

Irish Water welcomes the recognition in the NPF of the need to ensure that water and wastewater needs (including water conservation) are met by national projects to enable growth in the Dublin, Cork, Limerick, Galway and Waterford (Key Future Growth Enablers). Irish Water also welcomes the recognition in the NPF of the link and on-going challenges between development activity, water quality and our health. It is essential that vital growth enablers such as roads and water services are delivered in a timely and coordinated fashion and are not delayed at the planning stage. While larger projects may qualify as Strategic Infrastructure Development and go directly to ABP for approval, many planning approvals for water service projects are determined by Local Planning Authorities. Which ever approval process is followed we suggest that “a presumption in favour of development of key enabling infrastructure projects” in the planning process should be considered as a method of ensuring that essential services can be planned and delivered in a coordinated and timely fashion in the national interest.

We welcome the strategy of planning for more compact urban form, concentrating new development in brownfield sites rather than expanding current urban boundaries. While this strategy will ensure more effective use of existing infrastructure it needs to be implemented in conjunction with measures such as Sustainable Urban Drainage (SUDs) to maximise available capacity in combined sewer and storm sewer networks, water conservation and leakage management and availability of funding to upgrade/rehabilitate existing infrastructure where and when required. In addition, effective storm water management strategies should be developed in tandem with Irish Water Drainage Area Plans and the implementation of these strategies and plans coordinated.

3.0 Realising Our Sustainable Future

Irish Water note the inclusion of health risks to drinking water and treating urban waste water as key national environmental challenges in the NPF and welcome NPO 54 “That the planning system is responsive to our national environmental challenges and ensures that development occurs within environmental limits having regard to the requirements of all relevant environmental legislation and promotes the sustainable management of our natural capital.”

The environmental challenges of providing clean drinking water (such as an adequate, good quality raw water source) and the treatment and discharge of waste water (such as an appropriate receiving water) must be a consideration in the spatial and economic planning at a national, regional and local level. Inappropriately located settlements or enterprises near environmental sensitive areas may result in significant costs being incurred, both in terms of monetary costs and carbon footprint, to provide water service to such locations. A balance must be achieved between development aspirations and environmental protection, climate change/energy policy and the availability of funding to provide water service while complying with policy and legislation when developing spatial strategies at a regional and local level.

Irish Water welcomes NPO 60 in relation to the sustainable management of water resources. We are committed to working collaboratively with the Department of Housing, Planning and Local Government (DHPLG), the Environmental Protection Agency (EPA), local authorities, the Local Authority Waters and Communities Office (LAWCO), implementing bodies and stakeholders to support the development and implementation of the River Basin Management Plan (RBMP) and achievable programmes of measures (POMs).

However, we suggest that it is disproportionate that urban waste water is the only sector referenced in relation to negative impacts on water quality in Section 8.4 of the draft National Planning Framework document. The outputs of the EPA's characterisation process clearly demonstrate that multiple pressures are impacting on all water body types. Therefore, measures need to be proportionate across sectors and pressures.

Irish Water proposes that forward planning should be considered as a measure within the RBMP, as a means of reducing and mitigating pressures by managing growth and development in a way that can support a high quality environment. We welcome the development of national guidance on the relationship between the planning system and river basin management identified (Page 139) in relation to national strategic outcomes from the National Investment Plan and suggest that the publication of this guidance be considered a priority.

We welcome the support for Green Infrastructure in Section 8.3 of the Draft NPF and in NPO 59. We suggest that opportunities for implementing "blue-green infrastructure" should be included in this policy. Blue-Green Infrastructure is where there is a big focus on opportunities for Sustainable Urban Drainage (SUDs) within developments and in the public realm. This can have the effect of creating additional capacity in the existing combined sewer and storm sewer networks. This could have a strong synergy with the NPF objectives of regeneration of towns and city centres and of having higher densities. Regeneration projects would also present opportunities to implement such blue-green infrastructure. (For an overview of this worldwide trend refer to the International Water Association (IWA) "Principles of Water Wise Cities").

4.0 Implementation and Investment

We welcome the identification of national strategic outcomes of implementing the NPF and the introduction of a 10 year National Investment Plan to support those outcomes.

We note and welcome the inclusion of the "Sustainable management of water and other environmental resources" as one of the identified outcomes. We welcome the acknowledgement that water services infrastructure is critical to the implementation of the NPF and the inclusion of 8 key strategic outcomes relation to water services including:

- A new long term water supply source for the Eastern and Midland Region, which includes the Dublin Water Supply Area (DWSA), is needed by the mid-2020s, to provide for projected growth up to 2050 and contribute to resilience and security of supply for the region. This requires infrastructure provision to be guided and prioritised in a manner that can benefit the greatest number of areas within the country possible.
- Implement the Greater Dublin Strategic Drainage Study, through enlarging capacity in existing wastewater treatment plants (Ringsend) and providing a new treatment plant in North County Dublin - known as the Greater Dublin Drainage Project (GDD) Project.

In relation to the strategic outcome relating to untreated discharges from settlements_ (the second bullet point on page 139 under Water) we suggest that the proposed Outcome may better worded as follows ;

“Manage and improve quality of existing discharges in an economically sustainable manner based on environmental impact, whilst planning and delivering strategic infrastructure to support growth in tandem with objectives arising from Ireland2040.”

In relation to the strategic outcome relating to improving storm water infrastructure (the 6th bullet point on page 139 under Water) we suggest the proposed outcome may better be worded as follows;

“Develop both national and local capacity to fund, plan for and manage storm water by use of sustainable drainage principles and improve stormwater infrastructure to reduce flood risk in urban areas.”

We note the emphasis on new growth and development in the Draft NPF but suggest that the maintenance and renewal of existing infrastructure is equally important to providing a quality living environment. We suggest that reference to investment in renewal of existing infrastructure be included where appropriate. For example, in the 1st paragraph on page 139 when referring to the updating of Irish Water’s Water Services Strategic Plan reference should be made to “future development and renewal of existing infrastructure whilst also addressing environmental requirements”

In relation to Strengthening LA Planning (page 127) and Coordinating Landuse Zoning, Infrastructure and Services (page 128) we note NPOs 65, 67 and 68 in relation to a standardised methodology for the preparation of core strategies and a tiered approach to land zoning and welcome these approaches which should provide more certainty in relation to planning the provision of appropriate water services at settlement level. However, in relation to the final paragraph of Appendix 2, it should be noted that all IW investment has to be planned and implemented in accordance with procedures approved by the Commission for Regulation of Utilities.

5.0 Summary

Irish Water welcomes the publication of the Draft National Planning Framework and supports the strategies included in the document.

In particular we welcome the acknowledgement of the importance of water services in facilitating the social and economic development of our country, the inclusion of Sustainable Water Management as a National Strategic Outcome and the support for vital nationally important water services infrastructure in the National Investment Plan.

We strongly support NPO 54 "That the planning system is responsive to our national environmental challenges and ensures that development occurs within environmental limits having regard to the requirements of all relevant environmental legislation and promotes the sustainable management of our natural capital." We welcome the compact form of urban development proposed in the NPF as the most efficient method of providing new water services and utilising existing services.

Irish Water will endeavour to provide water service to support the strategies identified in the adopted NPF subject to budgetary and environmental constraints.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jerry Grant', written over a horizontal line.

Jerry Grant

Managing Director

02 November 2017