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RE: Irish Water Submission to the DHPCLG consultation document in relation to the development of the National Planning Framework “Ireland 2040 Our Plan – Issues and Choices” (Feb 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.

The DHPCLG, in its consultation document “**Ireland 2040 Our Plan – Issues and Choices**” (Feb 2017) identifies that the NPF “will provide the framework for future development and investment in Ireland” to 2040 and “will be particularly relevant where there is a long term and place based aspect to public policy and investment in areas such as housing, jobs, transport, education health, environment, energy, and communications”, allowing for “greater clarity for private sector investment.”

A clear vision and strategic framework for the likely type and scale of future development and a spatial pattern for that development is essential for an infrastructure provider such as Irish Water to ensure that we can provide water services where and when they are needed in a cost effective and sustainable manner. Thus, as a significant stakeholder in the National Planning Framework Irish Water welcomes this opportunity to engage with the DHPCLG in relation to its preparation.

The consultation document groups the issues and choices under main themes:

- Ireland’s National Planning Challenges (relating to future population growth and the pattern of settlement)
- People’s Health and Well-Being
- A Place-Making Strategy
- Ireland’s Unique Environment – Climate Change and Sustainability
- Equipping Ireland for Future Development – Infrastructure
- Enabling the Vision – Implementing the National Planning Framework

All of the above themes, to a greater or lesser extent, are of interest to Irish Water and will influence the way we plan and operate our infrastructure.

Of particular interest are the themes around population and economic growth and likely pattern and distribution of settlements in the future. The provision of high quality water supply and sanitary services are essential for the health and well-being of the population.

Preserving Ireland's unique environment and ensuring the sustainability of development and adapting to climate change is of particular interest to Irish Water given:

- Our reliance on the natural resource of water;
- The potential impact of wastewater discharges on the quality of the water bodies we discharge to;
- The potential impact of development on drinking water abstractions;
- The potential impact of climate change on that resource; and,
- Our high use of energy to produce drinking water and to clean waste water before it is returned to the environment.

The theme 'Equipping Ireland for Future Development – Infrastructure' is of primary interest to Irish Water as it relates to coordinating the planning and funding of strategic infrastructure that will be required to service planned development. While NPF perspectives and commitments can provide certainty of future development location, timing and water services needs, timely funding and implementation of Irish Water's multi-annual Investment Plans to deliver water services infrastructure to meet future demands will be fundamental to NPF realisation.

We have reviewed the "Where to Next" and the "Key Questions" for each of the above themes and while our submission below does not necessarily address specific questions we hope that it is sufficient to address many of the questions raised in terms of the implication of planning strategies on providing water services to support planned social and economic development. We have grouped our responses to the consultation document under the themes of 'Equipping Ireland for Future Development – Infrastructure' and 'Ireland's Unique Environment – Climate Change and Sustainability'.

2.0 Equipping Ireland for Future Development – Infrastructure

In line with legislative requirements, Irish Water has prepared a **Water Services Strategic Plan (WSSP)**, a 25 year plan setting out our strategic objectives for the delivery of water services to 2040 which was approved by the Minister in October 2015. The plan identifies our key long term objectives, our strategies for achieving those objectives and our current and medium term priorities. Catering for growth, achieving compliance in relation to water supply and wastewater discharge quality and reducing leakage are identified as priorities for this first WSSP which will be reviewed at least every five years. The WSSP also identifies IW's hierarchy of asset management plans and how they relate to the current framework of spatial planning at a national, regional and local scale. The WSSP forms the highest tier of asset management planning followed by Tier 2 Implementation Plans which address specific aspects of

the delivery of water services at a national scale and will identify Tier 3 projects and activities required to implement national strategies/plans at a regional or local scale. It should be noted that a number of Tier 3 projects of regional importance have already been identified through work carried out by regional and local authorities prior to the advent of IW.

Irish Water has made a commitment to review and revise the WSSP, as appropriate, once the National Planning Framework has been determined and adopted by the Houses of the Oireachtas.

2.1 Supporting Social and Economic Growth

Supporting social and economic growth through the provision of adequate water services infrastructure is one of our Key Objectives. The WSSP identifies a number of key challenges and uncertainties in delivering this Key Objective including:

1. Uncertainty in the rate of social and economic growth and changing demography and the resultant impact on demand projections
2. Balancing investment for growth with other investment priorities including compliance and security of supply
3. Impacts of climate change on the demand for and provision of water services
4. The significant time required to get strategic water and wastewater projects through the statutory planning process
5. Meeting environmental compliance while providing for growth

Our strategic aims in relation to supporting growth are to:

- Support National, Regional and Local spatial planning policy
- Facilitate growth in line with national and regional economic and spatial planning policy
- Ensure that water service are provided in a timely and cost effective manner

Strategies identified to deliver these aims include:

- Actively engage with national, regional and local planning authorities in the development of planning policy and documents and plan water services infrastructure at a strategic level to be consistent as far as is practicable with these policies and plans
- Invest in the development of strategic networks and treatment works to meet planned demand including maintaining appropriate headroom in this infrastructure to facilitate growth between investment periods
- Plan water services infrastructure to facilitate delivery on a phased basis to match projected demand as far as is practicable
- Maximise the capacity of our assets through effective asset management including optimised operation and leakage reduction

It is Irish Water's objective to provide strategic water services infrastructure to facilitate social and economic development which is in accordance with national, regional and local planning policy, subject

to budget availability and environmental constraints. A key target included in the WSSP for achieving these aims is the provision of headroom at treatment plants to cater for new growth between investment periods. The amount of headroom provided and investment priority will be linked to the size/status of the settlement (as defined by the NPF). Identification of a national settlement hierarchy will facilitate IW's prioritising of investment in growth areas.

It is our expectation that the adoption and implementation of the NPF will facilitate Irish Water in achieving our objective to support social and economic growth by:

- Providing clarity on where demand is likely to occur and the likely quantum of that demand and provide certainty with regard to adherence to and implementation of NPF through legislation
- Taking the impacts of climate change and environmental protection and compliance (including the monetary and environmental costs) into account when determining national spatial strategy
- Expediting the planning process for strategic water services projects through their identification as priority infrastructure required to deliver the objectives of the NPF
- Providing support for the provision of required funding to facilitate Irish Water delivering planned investment to support the spatial and economic strategies identified in the NPF and implemented at regional and county level

Irish Water supports the approach of linking spatial considerations to packaged and sequenced investment measures as the appropriate approach to be adopted in the NPF and we identify nationally strategic water services infrastructural priorities in Sections 2.2 and 2.3 below. We support the proposition of greater policy integration and joined-up investment decisions across planning and infrastructure delivery.

In relation to the Settlement Pattern (dispersed or compact) generally, Irish Water would favour a compact settlement pattern as concentrated development maximising the utilisation of existing capacity, where available, is the most cost effective and efficient way of providing water services. What must be avoided is the policy approach that led to the unfortunate legacy of c. 800 developer provided "private wastewater plants" which are today not performing and require massive investment to remedy and operate. In planning for the future, we must ensure that we do not repeat this mistake. Where private wastewater systems are to be permitted, it should only be on the basis that they can never become a liability on the state. While the initial cost of upgrading water services in settlement centres to accommodate densification may be greater than extending networks on the periphery of settlements, ultimately the operation and maintenance costs of compact networks would be less than that of extensive/dispersed networks. However, parallel initiatives to manage surface water in built up areas will need to be developed as the option to separate storm and foul drainage in existing built-up areas will be limited.

2.2 Water Supply Services

It is our stated policy to plan water resources at a national, regional and river basin level. The WSSP identifies our National Water Resources Plan, a Tier 2 implementation plan that is currently under development, as our key plan for identifying current and future demand and planning our water supply services in the medium to long term. We will have regard to current economic and population projections, national, regional and local development plans and the sustainability of current and future water sources to meet likely demands taking into account river basin management plans and the potential impacts of climate change. We will seek to build reliability and resilience in our water supply networks by interconnecting networks where possible or develop back-up sources, treatment and storage facilities. Our focus will be on Water Supply Zones and Water Resources Zone rather than at settlement level.

A number of key priority water supply developments have already been identified to implement these strategies based on work carried out by Local and Regional Authorities prior to the formation of Irish Water and are being progressed by Irish Water. The most significant of these are:

- A new water supply source for Irish Water's Eastern & Midlands 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. From an original ten new source options considered (2007-2016) the Preferred Scheme for a new water supply for the region has been identified as abstraction of water from the Lower Shannon at Parteen Basin, water treatment nearby at Birdhill, and treated water piped to a termination reservoir in Peamount, South Dublin, with supplies of treated water being made available to present and future domestic, commercial and industrial users along the proposed pipeline's 170km route. The approximate budget for this project will be in the range of €850-€950 million. This service provision also aligns with the need for infrastructure provision to be guided and prioritised in a manner that can benefit the greatest number of areas within the country possible. This would assist in supporting Dublin's importance as a national driver of growth, whilst also strengthening the role of a broader and wider region.
- In addition, 146 water supply projects which will facilitate the achievement of our objectives in relation to growth, quality and resilience have been identified for investment over the next five years in Irish Water's Draft Investment Plan 2017 - 2021.

2.3 Wastewater Service

It is Irish Water's objective is to provide effective management of wastewater by managing the availability and resilience of wastewater service now and into the future and by operating wastewater facilities in a manner that protects environmental quality. Through the preparation of our Wastewater Compliance Strategy, a Tier 2 plan, we will identify how we will ensure that discharges from our collection networks and treatment plants required to cater for current and future social economic development will meet the requirements of the Urban Wastewater Treatment Directive, River Basin

Management Plans and Water Framework Directive. With the exception of a small number of gateway conurbations such as Dublin and Cork, where collection networks may connect a number of settlements, our focus will be at settlement level.

The EPA has identified 44 settlements where raw sewage is being discharged untreated into the environment. Irish Water has included a target in our WSSP to provide the appropriate level of treatment at these 44 settlements by the end of 2021. The achievement of this target is essential to allow these 44 settlements to reach their development potential.

In addition, a number of key priority wastewater facility developments that are required to provide capacity for planned growth have already been identified based on work carried out by Local and Regional Authorities prior to the formation of Irish Water and are being progressed by Irish Water. The most significant of these are:

- Increase wastewater treatment capacity to facilitate projected growth in the Greater Dublin Area (GDA) , identified in the Greater Dublin Strategic Drainage Study, through enlarging the capacity in the existing wastewater treatment plant in Ringsend and providing a new treatment plant in North Co. Dublin (known as the Greater Dublin Drainage Project (GDD Project)) to ultimately treat wastewater generated north of the Liffey. The increase in capacity at Ringsend is needed as soon as possible and will require a budget of circa €365 million. The GDD Project will be needed by 2024 and will require a budget of circa €520 million.

3.0 Ireland's Unique Environment – Climate Change and Sustainability

3.1 Climate Change/Action

Irish Water welcomes the inclusion of climate change and sustainability considerations in the consultation document.

Climate change may have a significant impact on the availability of water sources and on the capacity of water bodies to assimilate wastewater discharges. We suggest that the impact of climate change on the water cycle and the resultant impact on water services and flooding should be a consideration in the determination of settlement strategy to be adopted in the NPF.

We note and welcome the reference to the National Climate Change Adaption Framework and the critical importance of planning and development measures in the overall strategy approach to tackling climate change adaption. Irish Water will develop a Tier 2 Climate Change Adaptation and Mitigation Strategy which will address how we propose to meet the challenges of climate change and future-proof our water services. An objective of the plan is to support national objectives for climate change mitigation and adaption under the National Climate Change Adaption Framework. IW would welcome any direction in relation to implementation of national policies that may be included in the NPF. In

addition, Irish Water is currently preparing a Tier 2 Sustainable Energy Strategy to address our obligation in relation to efficient and sustainable use of energy.

3.2 Ensuring the quality of our environment

It is of paramount interest to Irish Water that Ireland's water resources remain of sufficient quality and are available for "wise use" in water services that support the social and economic development of the country. It is Irish Water's aim to ensure that our water services are delivered in a sustainable manner which contributes to the protection of the environment and that we operate our water services infrastructure in a manner that supports the achievement of water body objectives under the Water Framework Directive and the Birds and Habitats Directives.

One of the key challenges we identified in our WSSP in terms of supporting social and economic growth with water services is meeting environmental compliance in relation to abstraction of water resources, quality of water resources and quality of discharges. We welcome the inclusion of this theme in the NPF and trust that the availability of water resources and suitable receiving waters for wastewater discharges will be a consideration in the selection of growth settlements, etc.

The energy cost of achieving suitable quality parameters for effluent discharges into environmentally sensitive areas should be considered, in addition to monetary costs, and the resultant impact of that energy usage on Ireland's climate change and emission strategies.

Planning constraints on projects that may have the potential to impact on environmentally sensitive areas and the time it is likely to take to get such projects through the planning system should be considered when identifying settlement patterns.

4.0 Summary

Irish Water welcomes the opportunity to engage with the DHPCLG and to inform the development of the NPF.

Our particular interest is in the strategic context that the NPF will provide for investment and prioritisation of water service infrastructure to support social and economic growth. We are also concerned with the cross-cutting themes of climate change and protecting our environment in relation to their influence on the provision of water services.

It is hoped that the adoption and implementation of the NPF will facilitate Irish Water achieving our objective to support social and economic growth by:

- Providing clarity on where demand is likely to occur and the likely quantum of that demand and provide certainty with regard to adherence to and implementation of NPF through legislation
- Taking the impacts of climate change and environmental protection and compliance into account when determining national spatial strategy

- Expediting the planning process for strategic water services project through their identification as priority infrastructure required to deliver the objectives of the NPF
- Providing support for the provision of required funding to facilitate Irish Water delivering planned investment to support the spatial and economic strategies identified in the NPF and implemented at regional and county level.

Irish Water supports the approach of linking spatial considerations to packaged and sequenced investment measures as the appropriate approach to be adopted in the NPF and we support the proposition of greater policy integration and joined-up investment decisions across planning and infrastructure delivery.

In relation to the settlement pattern (dispersed or compact) generally, Irish Water would favour a compact settlement pattern as the most cost effective and efficient way of providing water services.

Irish Water has a strategic plan for the delivery of water service to 2040 which identifies our key objectives, aims and our strategies for achieving these aims. This strategic plan will be supported by the development of national implementation plans which will specify how our strategies will be implemented and the projects required for delivery. A number of key priority water services infrastructure projects have already been identified that are required to support the objectives of the NSS and RPGs and to deliver Irish Water's objectives.

Our WSSP and Implementation Plans will be reviewed on a five-yearly basis and strategies and resultant priority projects will be updated as appropriate to respond to changing circumstances and demands. In particular, the WSSP will be updated to reflect the spatial and development strategies identified in the NPF.

Irish Water would welcome consideration and where appropriate inclusion of our national strategies and key priority water services infrastructure projects in the NPF. As water services are an essential requirement for realisation of national, regional and local policies and strategies for social and economic development, the majority of Irish Water's development projections can be considered strategic and as such we would welcome recognition of the strategic nature of our developments in the NPF.

Yours faithfully



Jerry Grant

Managing Director

27th March 2017