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22_IW_FP_49_LeitrimCDPMA

Re: Proposed Material Alterations to the Draft Leitrim County Development Plan 2023-2029

A Chara,

Irish Water welcomes the inclusion of Proposed Material Alterations arising from your consideration of our initial submission on the draft County Development Plan (Draft Plan). We have provided observations and comments on the proposed Material Alterations to the Draft Plan in relation to public water services below. We will continue to engage with the planning department as the development plan process progresses.

Changes to Table 2.6 and Land Use Zoning (MA 4, Volume 3 MAs)

We note the changes to Table 2.6 increasing the quantum of residential zoned lands and/or the housing yield. The proposed changes have increased the variance between household yield and the household allocation. The yield in some instances is significantly greater than the allocation e.g. Dromod. In order to align with the housing allocation and associated spatial planning policy, we suggest greater consistency between the household yield and household allocations over the Plan period.

The ability to cater for the proposed changes in housing yield are outlined below:

Settlement	Household Yield	Equivalent Population increase	Water Supply	Wastewater Treatment
Manorhamilton	130	332	North Leitrim Regional Water Supply. Capacity Available.	It is envisaged there is adequate capacity available to cater for the projected growth (to WWDL ELV capability) however, any additional growth may require a WWTP upgrade to increase capacity.
Drumshanbo	56	143	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required	Potential spare capacity, refer to capacity register. Any development will have to show that they do not cause a significant breach of Reg 43 of Wastewater Discharge Authorisation (WWDA) Regulations.
Kinlough	80	204	Supplied by Carrick on Shannon WRZ - Capacity	It is envisaged there is adequate capacity available to cater for

			Available - LoS improvement required	the projected growth (to WWDL ELV capability).
Dromod	53	135	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required	It is envisaged there is adequate capacity available to cater for the projected growth.
Leitrim	35	89	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required	It is envisaged there is adequate capacity available to cater for the projected growth.
<i>Subject to change. Reference should also be made to Irish Water's submission at the Draft Plan stage. LoS- Level of Service. WWDL ELV- Wastewater Discharge License Emissions Limit Value. WRZ- Water Resource Zone.</i>				

In the Carrick-on-Shannon RWSS, it is anticipated that ongoing upgrade works and leakage reduction activities will provide capacity to accommodate growth in the short term. However, a further upgrade at Carrick-on-Shannon WTP may be required in order to accommodate the targeted growth in Carrick-on-Shannon and environs. Planning for this upgrade has commenced and it is anticipated it will be delivered in the 2025-2029 Investment Plan period, subject to funding and statutory approvals.

Consultation on the Draft North-West Regional Water Resources Plan will commence this month. The Plan will identify plan-level approaches to address the identified need in a sustainable manner.

Available network information indicates network reinforcements e.g. extensions, may be required to service some zoned sites. Depending on the extent of development realised, network upgrades may be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less.

With regard to the proposed alterations, extensions and/ or upgrades may be required to service sites. Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed IW projects in place to progress such works.

All new residential and commercial/ industrial developments wishing to connect to an Irish Water network are to be assessed through Irish Water's New Connections process which will determine the exact requirements in relation to network and treatment capacity. New connections to Irish Water networks are subject to our Connections Charging Policy. Further information on this process is available at: <https://www.water.ie/connections/developer-services/>.

Third-party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure. Where Irish Water assets are within a proposed development site, these assets must be protected or diverted. If there is a possibility that Irish Water assets will need to be altered or diverted as a result of a proposed development, a diversion agreement may be required. Further information on this process is available at: <https://www.water.ie/connections/developer-services/diversions/>.

Additional site-specific comments are provided below:

Manorhamilton

MA 132- adjacent to reservoir, on-site boosting may be required.

MA 131- nearest public sewer is 150mm sewer approximately 150m away in the main road, potential for connection via the adjoining estate subject to third party agreement. Upgrade of the existing 150mm diameter sewer likely to be required, possibly as far as Park Road junction (>600m).

Drumshanbo

MA135- available GIS indicates nearest public sewer is in the main road.

Kinlough

MA138- The additional New Residential plot is approximately 9ha and does not appear to have been accounted for in MA 4 Table 2.6 Column A.

Dromod

MA140- Available GIS indicates the nearest sewer is approximately 400m away, network connectivity should be confirmed prior to finalising this proposed zoning.

Leitrim

MA141- watermain and sewer upgrades may be required.

MA 39 6.10.2 Land Use Zoning Principles

IW suggest the following amendment to the text:

.....It is the expressed view of Irish Water that the county is well served by its water and wastewater treatment plants and, notwithstanding constraints associated with the Carrick-on-Shannon water treatment plant and the wastewater treatment plants at Carrigallen which are expected to be addressed over the lifetime of the Plan, it is envisaged that the water and wastewater treatment plants can generally accommodate the household or population levels stated in the Core Strategy of this Plan. In the case of Drumshanbo and Mohill wastewater treatment plants however, potential availability of capacity is dependent on any additional load not resulting in a significant breach of the combined approach as set out in Regulation 43 of the Waste Water Discharge (Authorisation) Regulations 2007.....

Similar text included in Environmental Reports e.g. section 4.11.10.1, 4.11.10.2, NTS of the Strategic Environmental Assessment, should also be updated. No projects are planned at Drumshanbo or Mohill under the current Investment Plan period 2020-2024.

MA 66 10.4 Rural Economy Policies

Is this proposed new policy repetition of the policies set out in Chapter 8.11? We suggest that the proposed text set out in MA59 also apply to MA66.

Renewable Energy and Forestry

Proposed renewable energy and forestry developments should have due regard for, and not adversely impact, existing or planned water sources or infrastructure. Irish Water will engage via the planning process for such developments in its role as statutory consultee.

Potential development in un-serviced lands e.g. MA124, MA 125, MA143

A number of the proposed amendments may lead to development in lands not serviced by public water and/ or wastewater networks. As outlined in Draft Water Services Guidelines for Planning Authorities (Jan 2018), Section 5.3: '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 wastewater 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.' Developments in non-serviced lands shall have particular regard for, and not adversely impact on, drinking water sources. The environmental sensitivities referred to in the zoning objective R2 (A.1) are an important consideration in this context.

We look forward to engaging with Leitrim County Council as the Draft Development Plan progresses. Please note correspondence in relation to the Development Plan and any subsequent Local Area Plans, etc, can be sent to spatialplanning@water.ie.

Yours Sincerely,

Elaine Heneghan

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Forward Planning

Asset Strategy & Sustainability