

Planning Department
Leitrim County Council
Aras an Chontae
Carrick on Shannon
Co. Leitrim
N41 PF67

27/04/2022

Re: Response to the Draft Leitrim County Development Plan

Dear Sirs,

Irish Water (IW) welcomes the opportunity to comment on the Draft County Development Plan for the period 2023 - 2029. We note, and welcome, the inclusion of many objectives in the Draft CDP that will support the delivery IW plans, programmes and policies. These policies and objectives will also ensure the sustainable management of water and wastewater in line with national and regional objectives as stated in the National Planning Framework and the Regional Economic Spatial Strategy for the Northern and Western 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 & Plans
- General Comments

National and Regional Policy

NWRA Regional Spatial and Economic Strategy

Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and National Strategic Outcome No. 9 regarding Sustainable Management of Water. In addition, we support the adopted Northern and Western Region Regional Spatial and Economic Strategy (RSES) and are committed to supporting the policies therein, subject to budgetary and environmental constraints. In this regard we would draw your attention to Section 8 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, wastewater 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 Commission for the Regulation of Utilities (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 North West Regional Plan will commence later in 2022.

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 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.

The County is served by 23 wastewater treatment plants and a capacity register was issued to the Council under separate cover. Available capacity at any plant varies daily. Where there are constraints (or future constraints occur) 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/>

The table on the next page gives a snapshot of capacity of some of the larger settlements (*note these figures are estimates and are subject to change*). There are minor constraints in the sewer networks in some settlements. In 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.

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.

A strategic Network Development Plan will be prepared for Carrick-on-Shannon, which will help inform how zoned sites within the town could be serviced.

	Population 2016	Estimated 2028 Population Uplift	Wastewater Treatment Capacity	Sewer Network Capacity
Tier 1 - Key Town				
Carrick on Shannon	4,062	923	There is sufficient headroom to cater for this potential growth	No known capacity issues. Local network upgrades and extensions may be required to accommodate development.
Tier 2A - SR Growth Centres				
Ballinamore	914	288	There is sufficient headroom to cater for this potential growth	Performance/capacity issue at Swanlinbar Road Wastewater pumping station (WWPS). Local network upgrades and extensions may be required to accommodate development. No other known capacity issues.
Manorhamilton	1,466	252	There is sufficient headroom to cater for this potential growth	Performance/capacity issues at Bundoran Road WWPS and Lurganboy WWPS. Local network upgrades and extensions may be required to accommodate development. No other known capacity issues.
Tier 2 B - Support Towns				
Dromahair	808	112	There is sufficient headroom to cater for this potential growth	Storm water overflow (SWO) non-compliance (rear to Post Office) to be addressed to accommodate development. Elsewhere local network upgrades and extensions may be required to accommodate development. No other known capacity issues.
Drumshanbo	902	120	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.	Performance/capacity issue at Drumduff North WWPS. Local network upgrades and extensions may be required to accommodate development. No other known capacity issues.
Mohill	855	199	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 WWDA Regulations.	No known capacity issues. Local network upgrades and extensions may be required to accommodate development.

Kinlough	1,032	140	There is sufficient headroom to cater for this potential growth	
Tier 3 - Key Villages				
Carrigallen	387	105	There is currently no headroom in Carrigallen. Project underway which will provide capacity for the projected growth. It is anticipated the project will be completed within the Plan period.	No known capacity issues. Local network upgrades and extensions may be required to accommodate development.
Dromod	555	79	There is sufficient headroom to cater for this potential growth.	Performance/capacity issue at Dromod Harbour WWPS. Local network upgrades and extensions may be required to accommodate development. No other known capacity issues.
Drumkeeran	220	122	There is sufficient headroom to cater for this potential growth	No known capacity issues. Local network upgrades and extensions may be required to accommodate development.
Drumsna	240	46	There is sufficient headroom to cater for this potential growth	No known capacity issues. Local network upgrades and extensions may be required to accommodate development.
Leitrim	594	66	There is sufficient headroom to cater for this potential growth	Performance/capacity issue at Melvin Fields WWPS. Non-compliant SWO's to be addressed to accommodate development. Local network upgrades and extensions may be required to accommodate development.
Tullaghan	253	71	There is sufficient headroom to cater for this potential growth	No known capacity issues. Local network upgrades and extensions may be required to accommodate development.
Tiers 4 & 5 Villages/ Graigs				
	19,756	370		
40 No.			Keshcarrigan has no headroom	No known capacity issues in serviced areas. Local network upgrades and extensions may be required to accommodate development.
	32,044	2,894		

Water Infrastructure

County Leitrim is supplied by three water resource zones (WRZs); North Leitrim RWSS, Carrick-on-Shannon RWSS and the smaller Kinlough-Tullaghan WRZ.

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 envisaged it will be delivered in the 2025-2029 Investment Plan period, subject to funding and statutory approvals.

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. 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.

Comments regarding water supply availability can be found on the table below.

Irish Water and Leitrim County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Irish Water and Leitrim County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. Mains rehabilitation works have been carried out in recent years on distribution and trunk mains through the county, including in Carrick on Shannon, Ballinamore, Mohill and Manorhamilton.

	Population 2016	Estimated 2028 Population Uplift	Comment on Water Supply
Tier 1 - Key Town			
Carrick on Shannon	4,062	923	Supplied by Carrick on Shannon Water Supply Zone (WSZ). Capacity Available - Level of Service (LOS) improvement required.
Tier 2A - SR Growth Centres			
Ballinamore	914	288	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required
Manorhamilton	1,466	252	North Leitrim Regional Water Supply. Capacity Available.
Tier 2 B - Support Towns			
Dromahair	808	112	North Leitrim Regional Water Supply. Capacity Available.
Drumshanbo	902	120	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required
Mohill	855	199	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required
Kinlough	1,032	140	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required
Tier 3 - Key Villages			
Carrigallen	387	105	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required
Dromod	555	79	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required
Drumkeeran	220	122	North Leitrim Regional Water Supply. Capacity Available.
Drumsna	240	46	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required
Leitrim	594	66	Supplied by Carrick on Shannon WRZ - Capacity Available - LoS improvement required
Tullaghan	253	71	Kinlough Tullaghan WS. Capacity Available
Tiers 4 & 5 Villages & Graigs			
	19,756	370	
40 No.			
	32,044	2,894	

Other Policies and Plans

Climate Change

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

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

Irish Water supports the River Basin Management Plan (RBMP) Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive initial and further 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 the objectives and priorities of the third cycle RBMP (2022-2027) will be a key driver for the next investment plan.

Sustainable Drainage and Green-Blue Infrastructure

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. Irish Water would be happy to discuss potential opportunities to collaborate on projects that would remove stormwater from combined sewers.

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

Some general comments are outlined below: -

Section Number	Correction
Section 2.5	Table 2.7 It would be useful to have a Core Strategy Table that contained population targets. The Total Housing Yield column, Tier 3 subtotal & Total is unclear.
Section 3.17 [RUR SET OBJ 6]	At the end of the paragraph, it states <i>“Where there is an issue in relation to the provision of piped wastewater treatment in villages (Glenfarne, Kilclare and Rossinver) and in graigs, the Council will pursue the resolution of such constraints in conjunction with Irish Water and seek to explore appropriate funding measures for same”</i> We suggest replacing Irish Water with Department of Housing, Local Government and Heritage.
Section 4.10 ENT EMPL OBJ 4	The Objective states: <i>To work with Irish Water and other infrastructure providers, to support the provision of services and facilities to accommodate the future economic growth of the county and to seek to reserve infrastructure capacity for employment generating uses.</i> All new 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 (CCP). Where infrastructure upgrades are required to facilitate new connections, developers may be required to contribute to the costs of the upgrades, in

	<p>accordance with the CCP. Further information on this process is available at: https://www.water.ie/connections/developer-services/. There is no scope under the current CRU-approved Capital Investment Plan to reserve capacity for speculative commercial/ industrial development.</p>
<p>Section 8.11.2.5 Exceptional Circumstances</p>	<p>Public water and wastewater projects will be progressed in County Leitrim over the coming years which may require the creation of additional access points or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply. These projects are necessary to meet strategic growth and environmental objectives in local, regional and national planning policy. Provision should be made for these projects in the County Development Plan as per section 2.6 Exceptional Circumstances of the Spatial Planning and National Roads Guidelines. Irish Water would be happy to engage further with TII and LCC to ensure the necessary provisions are made in the development plan.</p>
<p>Volume 2 Settlement Plans 5.8.2 Drumshanbo 7.9.2 Mohill</p>	<p>In the first paragraph it states: <i>The 2020 Irish Water Annual Environmental Report indicates.....it is not envisaged that this will be exceeded during the lifetime of this plan.</i> These WWTPs are currently not compliant with Wastewater Discharge License standards but are capable of achieving at least Urban Wastewater Treatment Directive standards. There is potential spare capacity at these WWTPS; connections applications will be assessed individually depending on their specific load requirements.</p>
<p>Volume 2 Settlement Plans 8.2.2 Carrigallen</p> <p>21.2.2</p>	<p>Carrigallen states that there is current capacity. Whilst not correct at this point in time, a project is being funded under the Small Towns & Villages Growth Programme & will be completed within the lifetime of the Plan.</p> <p>Keshcarrigan – has no headroom</p>
<p>Section 6.10.2 Land Use Zoning Principles</p>	<p><i>However, it is the expressed view of Irish Water that there was not considered capacity issues any wastewater treatment plant or water treatment plant which would prohibit the realisation of the household or population levels stated in the Core Strategy of this Plan.</i></p> <p>IW suggest the revision of the above text. While Leitrim is generally well served by its water and wastewater treatment plants, as outlined in earlier sections of this submission, some constraints exist e.g. in Carrick-on-Shannon WRZ and at Mohill, Drumshanbo and Carrigallen WWTPs.</p>

	<p>We also note that the available capacity at treatment plants is subject to change, capacity registers will be issued annually to provide an updated overview of water supply and wastewater treatment capacity.</p>
Volume III Book of Maps	<p>In several settlements, the Wastewater Treatment Plant (WWTP) is close to lands with potential for the development of sensitive receptors e.g. residential dwellings. These include Carrigallen, Leitrim village, Drumkeeran. Any future development of these lands should take account of the established use of the existing wastewater treatment plant and the potential for extensions / intensification of use of the WWTP in the future.</p>
Environmental Reports	<p>The contents of this submission and the recently issued capacity registers should be taken account of in the Environmental Reports.</p>

Yours Sincerely,

Forward Planning Team
Asset Strategy