



Planning Department
Leitrim County Council
N41 PF67

Email: cpd@leitrimcoco.ie

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Re: Leitrim County Development Plan 2022 - 2028

Dear Sir/Madam,

Irish Water (IW) welcomes the opportunity to comment on the Issues Paper for the Leitrim County Development Plan 2022-2028. We have provided some observations and suggested text and objectives for inclusion in the draft County Development Plan below. We will continue to engage with the planning department as the development plan process progresses.

Background

Irish Water is responsible for the provision of public water supply, wastewater collection and treatment services. It is an objective of Irish Water to provide both drinking water and wastewater capacity to facilitate growth in accordance with core strategies at county level, and with national and regional planning policies and objectives (subject to the constraints of the Irish Water Capital Investment Programme). Leitrim County Council retains its role in facilitating the provision of adequate water services, in conjunction with Irish Water, at a local level, through Service Level Agreements (SLAs).

National and Regional Policy

Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and the recently adopted Northern and Western 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 8.5 of the RSES which provides general policy direction in relation to the sustainable management of water supply and wastewater needs.

Water Services Strategic Plan

In 2015 Irish Water published its Water Services Strategic Plan (WSSP), which sets out strategic objectives for the delivery of water services over a 25 year period and sets a context for investment and implementation plans. This plan is reviewed every five years and the first review is currently underway. Irish Water and Leitrim County Council will continue to work together to identify the water services required to support planned development in line with national and regional planning policies for inclusion in Irish Water Capital Investment Plans.

Capital Investment Plan 2020-2024

The purpose of the Investment Plan is to set out Irish Water's budgetary plan from 2020-2024 in line with our strategic objectives as detailed in the Water Services Strategic Plan (WSSP). Our primary function is to provide clean drinking water to customers and to treat and return wastewater safely to the environment. 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 Draft Investment Plan is has now been approved by Irish Water's regulator the Commission of the Regulation of Utilities (CRU). Further information on the current plan submitted for approval can be found on the CRU Website, www.cru.ie. Now that the Draft Investment Plan has been approved, work will commence internally in Irish Water to review it and to align it with Irish Water's Strategic Funding Plan and our work plans and programmes. We will keep Leitrim County Council informed of this process.

Zoning

Irish Water is available to assist Leitrim County Council in identifying suitable zoned lands from a water services perspective, as per Appendix 3 and NPO 72 of the National Planning Framework. In order to maximise the use of existing water services, Irish Water encourages sequential development in areas with existing water services infrastructure and spare capacity.

Sustainable Drainage and Green Infrastructure

Irish Water encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in new developments 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, while providing multiple benefits e.g. improved air quality, amenity, noise reduction.

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.

The National Water Resources Plan

Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). This 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. The National Water Resources Plan will outline the longer term plan for the Leitrim area and is due to be published for public consultation later this year.

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.

Irish Water is committed to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources. Good examples of where Irish Water is working in partnership with other stakeholders to protect drinking water quality are the National Pesticides and Drinking Water Action Group (NPDWAG), as well as catchment-specific NPDWAG Catchment Focus Groups. Irish Water is 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 RBMP Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive characterisation activities. Irish Water is a ~~are~~ members 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, we support the Local Authority Waters Programme (LAWPRO) desktop studies and local catchment assessment work with the provision of data. 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 of the RBMP.

Connections and Developer Services

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/>.

The Connections and Developer Services section of Irish Water also manage the diversion or alteration of Irish Water assets. Where 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/>.

Wastewater Infrastructure

Wastewater Treatment Plants (WWTPs)

Irish Water recently issued the wastewater treatment capacity register for Leitrim. The register outlines the capacity available for all settlements with a public WWTP within your local authority area. Projects have recently been completed at Drumshanbo, Mohill and Manorhamilton WWTPs.

Further upgrade(s) may also be progressed under Irish Water's Small Towns and Villages Growth Programme which is intended to provide growth capacity at WWTPs (and WTPs) in smaller settlements which would not otherwise be provided for in the current Investment Plan. Irish Water has begun a process of consultation with the Local Authorities to identify and plan for appropriate projects in each Local Authority area. This process is ongoing and will continue over the coming months. We expect that final decisions on investments will be made under this programme on a staggered basis from Q1 2021 on.

Wastewater Networks

Irish Water and Leitrim County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, etc. 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.

While there may be some localised constraints, there are no significant known bottlenecks in the wastewater networks in Leitrim's settlements. A strategic Network Development Plan will be prepared for Carrick-on-Shannon in 2021, which will help inform how zoned sites within the town could be serviced.

Water Infrastructure

Water Supply for Leitrim

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

Capacity is available in North Leitrim RWSS and upgrade works were recently completed at the water treatment plant in this WRZ.

As part of the NWRP, it has been assessed that the South Leitrim RWSS, which supplies the key town of Carrick-on-Shannon, may require further investigative studies or interventions to facilitate significant new connections to the network. It is anticipated that ongoing and planned minor upgrade works, as well as leakage reduction activities, will provide capacity to accommodate growth in the short term. However, a major upgrade at Carrick-on-Shannon water treatment plant may be required in order to accommodate the targeted growth in Carrick-on-Shannon and environs over the full plan period. It is envisaged that this would be undertaken in the 2025-2029 Investment Plan period, subject to funding approval.

The NWRP assessment has found that the Kinlough Tullaghan is WRZ is likely to require further investigative studies or interventions to facilitate significant new connections to the network.

The full options assessment stage of the NWRP is currently progressing, in consultation with the water services department of Leitrim County Council. This will identify the preferred interim and long-term interventions required to ensure a sustainable water supply in Leitrim, and nationally.

Water Networks

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.

Suggested policies/ objectives

Irish Water has a suite of policies/objectives which we would like to suggest to the Council for inclusion in the County Development Plan in relation to protecting Irish Water assets and the environment for the benefit of current and future population served by public water services networks. We have attached these policies/ objectives to this submission.

We look forward to engaging with Leitrim County Council as the Draft Development Plan preparation progresses. Further consultation documentation can be directed to spatialplanning@water.ie.

Yours Sincerely,



Suzanne Dempsey

Asset Strategy & Sustainability
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