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Re: Galway County Development Plan 2022 – 2028

Dear Sir/Madam,

Irish Water (IW) welcomes the opportunity to comment on the Issues Paper for the Galway County Development Plan 2022-2028. We have provided some observations and suggested text and objectives for inclusion in the draft County Development Plan below and attached. 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). Galway 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 Galway 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 has now been approved by Irish Water's regulator the Commission of the Regulation of Utilities (CRU). Further information on the plan 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 Galway County Council informed of this process.

Zoning

Irish Water is available to assist Galway 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. The impacts of climate change are taken into account in Irish Water plans and projects e.g. the National Water Resources Plan.

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.

The Issues Paper discusses the potential for treatment plant sludges in the circular economy. Treatment plant sludges are a valuable resource in the context of the circular economy, providing a sustainable source of precious finite materials. Irish Water is progressing a number of initiatives that take a sustainable, circular economy model for the management of our sludges e.g. cement manufacture from some water treatment plant sludges. This is a significant change from the traditional linear model of 'take-make-consume-waste-dispose', towards a sustainable approach, which focusses on productive reuse and recycling of sludges as a product.

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). 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. The National Water Resources Plan will outline the longer-term plan for the Galway 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 are members of Water Policy Advisory Committee, National Technical Implementation Group, and Regional Operational Committees. Irish Water work 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.

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 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 Galway. The register outlines the capacity available for all settlements with a public WWTP within the county.

Within the metropolitan area, Oranmore, Bearna are served by Mutton Island WWTP while a WWTP was constructed Claregalway in recent years. Both WWTPs have significant spare capacity. The Greater Galway Area Drainage Strategy will investigate options to provide for the growth in the Galway metropolitan area in the medium and long-term. This project is included in Irish Water's 2020-24 Investment Plan, with work underway to define the requirements of a Feasibility Study. The Study will assess the future needs of the area and make recommendations on capital interventions required.

Capacity is available in the Key Towns of Tuam and Ballinasloe to accommodate growth. A project is nearing completion to improve plant performance and compliance at Tuam WWTP.

Capital investment projects are ongoing to provide WWTPs in the previously untreated agglomerations of An Cheathru Rua, An Spideal, Ahascragh and Roundstone, and Glenamaddy

WWTP upgrade has recently been completed. Minor WWTP upgrades and improvements are also continually carried out on a nationally prioritised basis through Irish Water’s programmes.

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

A Drainage Area Plan (DAP) is underway and due to be completed in 2022 for Galway city agglomeration, including Oranmore and Bearna. This will assess the wastewater network in detail to identify issues and needs. Irish Water will engage with Galway County Council to ensure planned growth in the strategic growth areas and elsewhere in the city is taken account of in this study.

In parallel with the DAP, a Network Development Plan is scheduled to be carried out for Galway City agglomeration in 2021. This is a high-level study that will help inform how undeveloped zoned sites within the Bearna and Oranmore could be serviced. Network Development Plans are also being prepared for Claregalway and Athenry in 2020 and will commence for Tuam and Ballinasloe in 2021.

Other projects planned or ongoing to resolve existing constraints are summarised below.

- A local network reinforcement project in Galway city will provide a new wastewater storage tank at Merlin Park Pumping Station No.1 which will improve existing capacity constraints at Oranmore main pumping station.
- A project to resolve capacity constraints in the Athenry wastewater network is at detailed design stage.
- A hydraulic study will be undertaken in the 2020-2024 investment period to investigate issues associated with a stormwater overflow at Station Road in Loughrea.
- Pumping station upgrades in Ballinasloe (Dunloe P.S.) and Portumna (Green Isle P.S.) to resolve capacity constraints are under consideration.
- The capital investment projects to provide WWTPs in the previously untreated agglomerations of An Cheathru Rua, An Spideal, Ahascragh and Roundstone will also include the construction of new foul sewers to connect to the existing network.

There are no other known major constraints in the wastewater networks in Galway county.

Water Infrastructure

Water Supply for Galway

County Galway is supplied by 28 water resource zones (WRZs). As part of the NWRP, it has been assessed that the following WRZs may require further investigative studies or interventions to facilitate significant new connections to the network:

Lough Corrib (Galway City, Tuam, Loughrea)	Inishmean	Inishmore
Carna KilKieran RWSS	Ahascragh P.S.	Kilconnell PWS (GWS Import)
Dunmore_Glenamaddy P.S.	Ballinasloe Public Supply	Kinvara P.S.
Kilkerrin Moylough	Ballyconneely P.S.	Leenane P.S.
Mountbellew P.S.	Clifden	Portumna PS
Rosmuc P.S.	Clonbur PS	Tully-Tullycross
Teeranea_Lettermore P.S.	Gort	Inishere
Ballymoe P.S.	Inisboffin P.S.	Lough Mask RWSS

It is unlikely that there will be any issues facilitating new connections in the remaining WRZs (Mid-Galway, Oughterard, Cleggan-Claddaghduff and Woodford PS), although further investigative studies or interventions may be required in some instances.

Two water treatment plants in Loughrea will be rationalised into the Tuam Regional Water Supply Scheme (RWSS) (part of Lough Corrib WRZ) later this year. Treatment plant upgrades with a focus on water quality have recently been carried out in Gort, Carraroe, Spiddle, Ballinasloe. Groundwater interventions at Kilkieran Moylough and Dunmore Glenmaddy WRZs are being investigated.

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

Water Networks

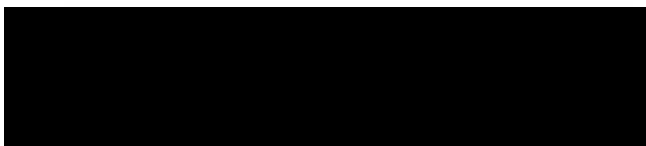
Irish Water and Galway County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Irish Water and Galway County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. Mains rehabilitation works have been carried out in recent years on distribution and trunk mains throughout the county, including in Spiddle, Glenamaddy, Rosmuc, Tuam, Teeranea/ Lettermore, Kinvarra, Inishmore, Clonbur, Briarhill and Carraroe. Additional mains rehabilitation works in Spiddle and Ahascragh are anticipated to be completed by the end of 2020. Other recent network projects include the connection of Loughrea to Tuam RWSS.

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 Galway 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
Spatial Planning Lead

Menu of appropriate Objectives/Policies for Water Services in Development Plans

General Policies in relation to Water Services

- a) To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realize the development objectives of this plan;
- b) To consult with Irish Water in the development of Plans, SDZs, etc in order to ensure the proposed spatial strategy takes account of:
 - the available capacity of the public water services infrastructure;
 - the need to protect and optimise existing and planned public water services infrastructure;
 - the need for sequential and phased development;
 - the financial and environmental implications of development in sensitive areas.
- c) Prior to granting planning permission the Council will ensure that adequate water services will be available to service development and that existing water services are not negatively impacted. Council should require developers to provide evidence of consultation with Irish Water prior to applying for planning permission;
- d) To protect existing wayleaves and buffer zones around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required water services infrastructure as necessary;

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Water Supply

- e) To protect both ground and surface water resources including taking account of the impacts of climate change, and to support Irish Water in the development and implementation of Drinking Water Safety Plans and the National Water Resources Plan;
- f) To promote water conservation and demand management measures among all water users, and to support Irish Water in implementing water conservation measures such as leakage reduction and network improvements.

Wastewater Services

- g) To ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure;
- h) To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm;
- i) To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water;

- j) To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works;
- k) To ensure that all new developments connect to the public wastewater infrastructure, where available, and to encourage existing developments that are in close proximity to a public sewer to connect to that sewer. These will be subject to a connection agreement with Irish Water;
- l) To refuse residential development that requires the provision of private waste water treatment facilities (i.e. Developer Provided Infrastructure), other than single house systems;
- m) The provision of single house septic tanks and treatment plants in the Plan area will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards, including the EPA's Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (PE. ≤10) (EPA 2009), as may be amended, will be required;
- n) To ensure that private wastewater treatment facilities, where permitted, are operated in compliance with their wastewater discharge license, in order to protect water quality.

Note: As per Section 5.3 of the Draft Water Services Guidelines for Planning Authorities, *'Alternative solutions such as private wells or waste water 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 opportunity may arise for the development to connect into the network in the future however, the developer provided treatment facility would not be taken over.