



Denis Malone,
Senior Planner,
Planning Department,
County Hall,
John Street,
Kilkenny

20th December 2018

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Re: Proposed Draft Callan Local Area Plan and associated reports

Dear Mr. Malone,

Irish Water welcomes the opportunity to review the Proposed Draft Callan Local Area Plan and associated Strategic Environmental Assessment, Appropriate Assessment, Strategic Flood Risk Assessment, and the Bridge Street Masterplan area.

We have reviewed the comments made regarding water services in the Draft LAP and associated reports, and recommend the following alterations (outlined in red below), with strikethrough of text to be removed where relevant:

Section 9.1 of the Draft Callan LAP: Water Services:

'Irish Water (IW) aims to deliver improvements to water services throughout Ireland where they are needed most. The primary function of Irish Water is to provide clean drinking water to customers and to treat and return wastewater safely to the environment.

Irish Water's Investment Plan is a capital investment portfolio over a five year period. A draft Irish Water Investment Plan 2020 to 2024 has recently been prepared to facilitate a stakeholder engagement process. This plan states that 'Irish Water will optimise investment decisions by prioritising the best possible service improvements, while maximising value for money.' ~~Irish Water's 2020-2024 Investment Plan has been submitted to the Commission for Regulation of Utilities (CRU) in November 2018; further details can be found on the CRU website at www.cru.ie, and any comments/observations on the CRU Discussion paper can be made to the CRU by 18th January 2019.~~

Section 9.1 of the Draft Callan LAP: Waste Water Treatment:

'The existing treatment plant in Callan has a ~~design~~ capacity ~~for population~~ of 4000pe and all the majority of properties within the town are connected ~~to the WWTP via the wastewater network serving the town.~~ The capacity available in the Callan WWTP for ~~future/proposed development, is currently under assessment by Irish Water.~~ However ~~it's~~ ~~The network is~~ a combined system with mixed storm and foul water which can be

problematic when flood events occur. The town also has a proliferation of pumping stations. The Callan network has been included on the national stormwater overflow (SWO) survey and assessment programme, which has commenced and will take 2-3 years to complete. A strategic assessment of the towns existing network of pumping stations is required and The requirement for additional stations should be limited where possible. Within Irish Water's Draft Investment Plan a provisional and draft list of projects and programmes is provided. The projects and programmes listed are expected to be commenced, progressed or completed during the 2020-2024 period. Callan WWTP is included under this list and Table 15 provides an extract from the supplementary capacity register. However, in relation to headroom (PE), the register states that the available capacity is not confirmed until environmental and asset assessments are completed. In terms of additional comments in relation to the Callan WWTP, it also states that more stringent Emission Limit Values are required from 2020.

Section 9.1 of the Draft Callan LAP: Water Supply:

'The supply of water for Callan is met from a local spring source supplemented by a borehole supply. The spring capacity is approximately 30-35 cu/hr which is then topped up from the borehole supply. Demand is currently running at 45-48 cu/hr and whilst this capacity is being met at the moment, the capacity of the borehole is unknown. This renders the overall water supply infrastructure functional but tenuous in respect of future development. There is sufficient pressure in the network at present. The key issue is the maintenance of sufficient head at the water tower and pipe restrictions within the network.' While capacity for further development is limited at present, further studies/surveys can be completed over the medium term to confirm the capacity of the sources, in order to determine how much new development can be accommodated; and if investment is needed it shall be in line with the relevant Irish Water policies.

Section 9.1 of the Draft Callan LAP: Infrastructure-Development Objectives:

IN3: It is an objective of Kilkenny County Council to align future development with capacity at the Callan Waste Water Treatment Plant to ensure that any improvements needed are sufficient to meet standards required to avoid significant adverse effects on the River Nore and River Barrow SAC.

Section 5.1.2 of the Draft Strategic Environmental Assessment:

'The evaluation concludes that there are a number of potential effects associated with all development alternatives which are summarised below:

- Reduction in water quality (this will depend on the provision of additional waste water treatment facilities);' Irish Water has advised that the available capacity of the Callan WWTP to cater for future development is currently under review and subject to environmental and asset surveys.

General updates:-

Water supply/treatment:

There is limited capacity available in the Callan sources at present. Further studies/surveys are needed to confirm the capacity of the sources.

Wastewater networks/treatment:

The available capacity in the Callan wastewater treatment plant is subject to further environmental and asset assessments which are currently ongoing. In addition, the Callan network has been included on the national stormwater overflow (SWO) survey and assessment programme, which has commenced and will take 2-3 years to complete. In this regard, the Callan wastewater network is currently listed as possibly constrained in terms of capacity, and the outcome of the survey and assessment programme will provide further detail on the capacity of the network to cater for new development.

Bridge Street Masterplan:

Irish Water notes it is proposed to locate elements of this project in close proximity to the wastewater pumping station at Clodeen Lane. We would request further information and liaison with Irish Water in order to ensure no conflict with Irish Water above ground assets.

It is also proposed to locate elements of this project in close proximity to, Irish Water water mains and sewer pipes (below ground assets). It is noted that there is both a wastewater rising main and a watermain crossing the King's River in close proximity to the Clodeen Lane pump station and hence close to the proposed pedestrian and cycle bridge as shown in the Bridge Street Masterplan area plan. We would request further liaison with Irish Water in order to ensure no conflict with Irish Water assets in this area.

Growth & development:

There may be a need for local network reinforcement depending on location and size of any new development/s, this will be identified during the connection applications process. All new developments are to be assessed through Irish Water's New Connections process (including the pre-connection enquiry process which is to be undertaken pre-planning) and which will determine the exact requirements in relation to network and treatment capacity.

Irish Water has a suite of policies/ objectives which we would like to suggest to the Council for inclusion in the Local Area 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.

Irish Water is available to discuss the submission with Kilkenny County Council and any other issue with respect to the provision of water services within our remit.

Yours Sincerely,

P.P. Dempsey

Suzanne Dempsey
Spatial Planning Strategy Specialist

Attached:
Menu of Policy Objectives