

Senior Planner,
Planning Department,
Kilkenny County Council and Carlow County Council

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

25th January 2021

20_IW_FP_56_Draft-Graigue-Tinn LAP

Irish Water
PO Box 6000
Dublin 1
Ireland

Re: Graiguenamangh – Tinnahinch Draft Joint Local Area Plan 2020

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Dear Sir/Madam,

Irish Water welcomes the opportunity to comment on the Graiguenamangh – Tinnahinch Draft Joint Local Area Plan 2020. 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 updates become available.

Irish Water Investment Plan (Revenue Control Period 3) 2020 to 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 for 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 nearly completed internally in IW to review it and to align it with Irish Water's Strategic Funding Plan and our work plans and programmes. We will keep Kilkenny and Carlow County Councils informed of this process.

National Water Resource 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 Irish Water to prepare for the future and ensure that we can provide enough safe, clean drinking water to facilitate the social and economic growth of our country. A statutory public consultation was launched late 2020 seeking feedback on the draft NWRP and associated draft SEA Environmental Report and draft Natura Impact Statement.

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 Councils to ensure the overarching goals of mitigating against, and adapting to, climate change in relation to water and wastewater are achieved.

Water supply in Graiguenamanagh Tinnahinch:

Graiguenamanagh-Tinnahinch is supplied from the Graiguenamanagh water resource zone (WRZ). The Graiguenamanagh WRZ is supplied from two sources, (i) a number of springs on Brandon Hill, and (ii) extraction from the River Duiske.

There is a deficit in the Graiguenamanagh WRZ and it will require further investigative studies and interventions to facilitate new connections/developments to the network. The development of additional groundwater supplies was investigated previously but did not yield any additional water. The plan to address the deficit for the Graiguenamanagh WRZ is currently being developed through the National Water Resources Plan Full Options Assessment process, with an outcome anticipated in mid 2021. Following that process, it is possible that significant upgrades/interventions may be needed. Irish Water will keep Carlow and Kilkenny County Councils informed on this process.

Water Networks:

Irish Water and Carlow and Kilkenny County Councils are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Irish Water and the Councils will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

Wastewater infrastructure in Waterford:

Graiguenamanagh and Tinnahinch are served by the Graiguenamanagh Tinnahinch WWTP. In 2020 Irish Water provided Kilkenny and Carlow County Councils with a wastewater treatment capacity register for both counties. The register outlines the capacity available for all settlements with a public wastewater treatment plant within the local authority area. The design capacity of the Graiguenamanagh-Tinnahinch WWTP is 3,000pe. There is sufficient capacity in the Graiguenamanagh Tinnahinch WWTP to cater for the level of growth proposed in the Draft Joint LAP.

Wastewater Networks:

Irish Water and Kilkenny and Carlow County Councils are continually progressing sewer rehabilitation activities, capital maintenance activities, etc, and Irish Water and the Councils will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

Sustainable Drainage and Blue/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.

Zoning

Irish Water is available to assist Kilkenny and Carlow County Councils 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.

General Comments:

We look forward to engaging with Kilkenny and Carlow County Councils and providing regular updates on Irish Water activities as the Draft Joint Local Area Plan preparation progresses.

Yours sincerely,



Suzanne Dempsey
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