



Planning Department,
Kilkenny County Council,
County Hall,
John Street,
Kilkenny.

12th March 2021

21_IW_FP_4_Draft-CDP Kilkenny CC

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Re: Review of Draft Kilkenny City and County Development Plan 2021-2027

Dear Sir/Madam,

Irish Water welcomes the opportunity to comment on the Draft County Development Plan 2021-2027. 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.

National and Regional Policy:

Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and the recently adopted Southern Region Regional Spatial and Economic Strategy (RSES) and we are committed to ensuring that we support the policies therein, where they relate to water services provision, while still ensuring we adhere to our budgetary constraints and other responsibilities. In this regard we would draw your attention to Section 8.1 of the RSES which provides general policy direction in relation to the sustainable management of water supply and wastewater needs.

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 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 is nearly finalised 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 County Council 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 us 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.

The development of the National Water Resource Plan is taking place in two phases. Phase 1 – the Draft Framework Plan identifies how we assess needs across all of our water supplies, and the process that we will use to find solutions to address those needs. The Draft Framework Plan has been published for public consultation and the consultation period will run until 12th March 2021.

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.

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.

Irish Water would like to suggest some objectives which could be included in the County Development Plan as follows:

- i. To protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the WFD. Protection and restoration of drinking water at the source can have co-benefits for biodiversity and climate change;
- ii. To support Irish Water in the development and implementation of Drinking Water Safety Plans which seek to protect human health by identifying, assessing and managing risks to water quality and quantity; taking a holistic approach from source to tap.

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 member 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.

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.

Water supply in Kilkenny:

There are 12no. water resource zones (WRZ) in County Kilkenny. Some of the WRZs may require further investigative studies or interventions to facilitate significant new connections/developments to the network. Irish Water has provided an update on available capacity in the table attached to this submission. It should be noted that capacity information is based on best available information at the date of issue and is subject to change.

In addition, the full options assessment stage of the National Water Resource Plan is currently progressing, in consultation with the water services department of Kilkenny County Council. This will identify the preferred interim and long-term interventions required to ensure a sustainable water supply in WRZs in County Kilkenny.

Irish Water notes the inclusion of suggested policy in relation to the provision of wells on a temporary basis to service developments in the short term where water capacity is constrained (Section 10.1.4 of the Draft CDP Volume 1); Irish Water is currently reviewing this approach and will respond in due course.

Water Networks:

Irish Water and Kilkenny County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. There have been find and fix and DMA establishment/rationalisation programmes progressed on the Kilkenny city water networks over the past number of years to improve the reliability of the network and reduce leakage. There is also a backyard services and lead replacement programme which has been ongoing over the past years but is currently on hold pending budget availability. Irish Water and the Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

Wastewater infrastructure in Kilkenny:

There are currently 34no. public wastewater treatment plants (WWTP) in Kilkenny county. Irish Water recently provided Kilkenny County Council with a wastewater treatment capacity register for Kilkenny. The register outlines the capacity available for all settlements with a public wastewater treatment plant within the local authority area. This will provide Kilkenny County Council with a good basis for assessing where capacity is available in the various settlements within the county, and it shows that a large proportion of the WWDA licenced WWTPs in the county currently have capacity for some growth.

Wastewater Networks:

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

A Drainage Area Plan is being progressed for the wastewater network in Kilkenny city. The Drainage Area Plan (DAP) will assess in detail the performance of the wastewater networks in these settlements. Wastewater networks in this context include foul sewers and combined sewers but exclude storm sewers which are within the remit of the local authority. Irish Water will keep Kilkenny County Council updated on progress with the DAP as the development plan process progresses.

IW Small Towns and Villages Growth Programme:

Irish Water is progressing a Small Towns and Villages Growth Programme (STVGP) which is intended to provide funding for water and wastewater treatment plant growth capacity in smaller settlements which would not otherwise be provided for in the Capital Investment Plan 2020 to 2024. The STVGP is focused on supporting growth in areas already served by IW infrastructure but where current or future capacity deficits have been identified. Irish Water is working with Local Authorities across the country to ensure that the investment is made appropriately in accordance with the relevant county development plan. At the current stage in the process, Irish Water is reviewing the nominations to determine which project(s) will be funded, taking into account the order of priority provided by the local authority, the allocation available and the potential solutions and cost estimates. It is anticipated that LAs including Kilkenny CC will be notified of successful projects on a staggered basis from Q2 2021 as project details are agreed.

Zoning

Irish Water is available to assist Kilkenny 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.

General Comments:

Draft County Development Plan - Appendix B: - Housing strategy:-

Irish Water notes the inclusion of wastewater capacity figures in Table 1 and Table 3 of Appendix B and we wish to advise that all capacity figures are based on best available information at the date of issue and are subject to change.

Irish Water also notes the reference to Inistioge in Table 3 (Note 8), and wishes to advise that no projects have been confirmed yet for the next capital investment plan (post 2024).

Suggested Policies and 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 further with Kilkenny County Council and providing regular updates on Irish Water activities as the County Development Plan preparation progresses.

Yours sincerely,



Suzanne Dempsey
Asset Strategy & Sustainability
Spatial Planning Lead

Attached:

Menu of Policy Objectives

Water Capacity Table