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## Re: Issues Paper – Clare County Development Plan 2022 – 2028

Dear Sir/Madam,

Irish Water (IW) welcomes the opportunity to comment on the Issues Paper for the Clare County Development Plan 2022-2028. We have provided some observations and suggested text and objectives for inclusion in the draft 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 support national, regional and local economic and spatial planning policy (subject to the constraints of the Irish Water Capital Investment Plan). Clare 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 Southern 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 8.1 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 six strategic objectives for the delivery of water services over a 25-year period and sets a context for investment and implementation plans. These strategic objectives are:

- Meet customer expectations;
- Ensure a safe and reliable water supply;
- Provide effective management of wastewater;
- Protect and enhance the environment;
- Support social and economic growth;
- Invest in our future.

The WSSP is reviewed every five years and the first review is currently underway. Irish Water and Clare 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](http://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 Clare County Council informed of this process.

### **Zoning**

Irish Water is available to assist Clare County Council in identifying suitable zoned lands from a water services perspective. 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-Blue Infrastructure**

Irish Water encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new developments including the public realm 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 (thus increasing capacity for foul drainage from new developments), 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.

Irish Water is happy to work with the local authority to ensure the overarching goals of mitigating, 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 Clare 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) Drinking 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 monetary and environmental 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 in the RBMP implementation structures and participation in Water Framework Directive characterisation activities. Irish Water is a member of the 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.

### **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/>.

The proposed South Clare Economic Strategic Development Zone (SDZ) at University of Limerick (Clare campus) would represent a significant demand in terms of both water and wastewater. Continued engagement with our forward planning and connection and developer services teams will help ensuring these demands can be facilitated.

### **Wastewater Infrastructure**

#### ***Wastewater Treatment Plants (WWTPs)***

Earlier this year, Irish Water issued a wastewater treatment capacity register for county Clare. The register outlines the capacity available for all settlements with a public WWTP within the county.

In the Key Town of Ennis, capacity is available at both Clareabbey and Ennis North WWTPs. Upgrade projects are included in the Irish Water Investment Programme 2020-24 at both WWTPs which will provide additional capacity. Similarly, in Shannon, a WWTP upgrade to improve performance and provide significant additional capacity will be completed in 2021.



Several of the smaller settlements in the Limerick metropolitan area in County Clare are served by Bunlicky and Castletroy WWTPs, both of which currently have headroom and projects underway to provide additional capacity. At Ballycannan, a project is underway to connect the settlement to the Limerick City agglomeration.

WWTP upgrade projects are also underway at Killaloe, Ennisymon, Lahinch and Quin, all of which will provide capacity for growth. Capital investment projects are ongoing to provide WWTPs in the previously untreated agglomerations of Ballyvaughan, Liscannor, Kilkee and Kilrush. 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 in Irish Water's treatment plants 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 Clare County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, etc. Irish Water and Clare County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. A capital project is also underway to pump the wastewater load from Clarecastle to Clareabbey WWTP.

A Network Development Plan (NDP) for Ennis was completed in 2019. This is a high-level study that will help inform how undeveloped zoned sites could be serviced. NDPs are also being prepared for settlements served by IW infrastructure in the Limerick metropolitan area.

Drainage Area Plans (DAPs) assess the wastewater network in detail to identify issues and needs. A DAP is underway and due to be completed in 2024 for the Limerick and Castletroy agglomerations and a DAP for Ennis is anticipated to commence in 2021, subject to funding approval. Irish Water will engage with Clare County Council to ensure planned growth is taken account of in these studies. A DAP for Shannon was also completed in 2017.

There are constraints in some wastewater networks across the county where upgrades may be required to accommodate new development. Known significant wastewater and water network constraints have been identified as part of our engagement with Clare County Council on their service infrastructure review earlier this year.

## **Water Infrastructure**

### **Water Supply for Clare**

County Clare is supplied by 16 water resource zones (WRZs). As part of the NWRP, it has been assessed that it is unlikely that there will be any issues facilitating new connections in the following WRZs: Killaloe, Corofin, Kilkeedy and Feakle water supplies, although further investigative studies or interventions may be required in some instances.

The NWRP has determined that the following WRZs may require further investigative studies or interventions to facilitate significant new connections to the network:

West Clare	Mountshannon PWS	Flagmount PWS
Ennisymon	Ennis / Shannon/Sixmilebridge	Carron PWS
Ennis	Obriens Bridge PWS	Scarriff PWS
Turlough	Killadysert PWS	

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

The emerging preferred approach for the Ennis/ Shannon/ Sixmilebridge WRZ under the NWRP full options assessment is to connect to Limerick City WRZ. However, in the short-term, potential improvements at Crean and Castle Lake WTPs may be required to facilitate growth; these are currently under investigation. Water treatment plant upgrades are due to commence in the Corofin, Ennistymon and West Clare WRZs in 2021.

### **Water Networks**

Irish Water and Clare County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. For example, in Milltown Malbay, construction of a new reservoir and mains rehabilitation to address level of service issues is due to commence imminently.

Irish Water and Clare 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 as part of the Leakage Reduction Programme on distribution and trunk mains throughout the county, totalling approx. 15km in total. Additional mains rehabilitation works in Kilmurray and Milltown Malbay (c.5km) are anticipated to be completed by the end of 2020.

### **Suggested policies/ objectives**

Irish Water has a suite of policies/objectives which we would like to suggest to the Council for inclusion in the 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 Clare County Council as the Draft Development Plan preparation progresses. Further consultation documentation can be directed to [spatialplanning@water.ie](mailto:spatialplanning@water.ie).

Yours Sincerely,



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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. The 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;

### Water Supply

- e) 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;
- f) 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.
- g) To support Irish Water in the development and implementation of the National Water Resources Plan for Ireland's public water supplies which seeks to address issues around the availability of water;
- h) 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, including innovative solutions in specific situations.

### Wastewater Services

- i) 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;

- j) 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;
- k) 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;
- l) 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;
- m) 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;
- n) To refuse residential development that requires the provision of private waste water treatment facilities (i.e. Developer Provided Infrastructure), other than single house systems;
- o) 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;
- p) 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.