

[REDACTED]

Sent: 09 January 2020 16:42
To: 'Niamh McDonald'
Subject: RE: County Development Plan Review

A Chara,

I wish to acknowledge, with thanks, receipt of your submission regarding the County Development Plan review.

Mise le meas,

[REDACTED]
Planning, Development and Environment.

From: Niamh McDonald [REDACTED]
Sent: 09 January 2020 16:37
To: Planning - Plan Review
Subject: County Development Plan Review

To whom it may concern,

On behalf of Irish Water, please find attached our submission in relation to the Issues Paper for the new County Development Plan 2021-2027

Kind regards, Niamh

Niamh McDonald (BA, BAI, MSc, CEng, MIEI)
Asset Strategy & Sustainability
Regional Forward Planning Specialist (East and Midlands)

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County Development Plan Review

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09/01/2020

Re: Response to Wicklow CDP Issues Paper

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Dear Sirs,

Irish Water (IW) welcomes the opportunity to comment on the Issues Paper for the preparation of a new County Development Plan for Wicklow for the period 2021-2027.

Wastewater Infrastructure

The table below gives a general comment on capacity in the main urban settlements. Prior to the completion of the draft Core Strategy (for Stage 2 Consultation), IW will have completed the 2019 Capacity Register for treatment plants in Wicklow, and will be able to discuss in more detail, the following and other settlements:-

Wastewater Treatment Plant (WWTP)	Census Population (2016)	Capacity Available
Shanganagh WWTP	32,600	Capacity
Greystones WWTP	18,140	Capacity
Wicklow WWTP	13,954	Capacity
Arklow WWTP	13,163	Constrained, Project Underway
Blessington WWTP	5,520	Constrained, Project Underway
Kilcoole WWTP	4,239	Capacity
Baltinglass WWTP	2,137	Limited - Under Review
Enniskerry WWTP	1,889	Capacity
Rathdrum WWTP	1,663	Capacity
Aughrim WWTP	1,442	Constrained
Kilpedder WWTP	1,255	Very Limited Capacity
Carnew WWTP	1,052	Limited Capacity

With regard to the wastewater network, it should be noted that parts of the Bray catchment form part of the Bray-Shanganagh Drainage Area Plan, which is currently being undertaken by Irish Water. The study will identify, and make recommendations to resolve, any issues with the current network.

Water Infrastructure

Wicklow has 35 water resource zones and the supply across the county is managed using the interconnectivity between the zones.

The National Water Resources Plan team are currently assessing the optioneering proposals for the 25 year plan, to address the water need for Wicklow county to deliver secure, reliable and sustainable long-term water supplies which facilitate domestic and economic development (subject to the constraints of the Irish Water Capital Investment Programme).

Suggested Text for the draft CDP

With reference to the current CDP, we suggest the inclusion of the following updated text (or similar) for Chapter 9 Infrastructure.

Context

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). Wicklow 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).

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 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. Irish Water and Wicklow 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 the Irish Water Capital Investment Plans.

Irish Water Capital Investment Plan

The Capital Investment Programme (CIP) of Irish Water outlines the indicative priorities and investments in water services infrastructure over the plan period. This CIP aims to deliver

improvements in drinking water quality, leakage, wastewater compliance, business efficiencies and customer service. The CRU review and approve the CIP, the next programme will cover the period from 2020 – 2024.

Suggested Policies – Water Supply & Distribution

It is the policy of the Council to work in conjunction with Irish Water to protect existing water infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new water services infrastructure to facilitate future growth.

Objective 1

To protect both ground and surface water resources and to work with Irish Water to develop and implement Water Safety Plans to protect sources of public water supply and their contributing catchment.

Objective 2

To ensure that adequate water services will be available to service development prior to the granting of planning permission for those developments and to require developers to consult Irish Water regarding available capacity, prior to applying for planning permission.

Objective 3

To minimise wastage of water supply by requiring new developments to incorporate water conservation measures

Objective 4

Provide guidance and advice regarding the protection of water supply to private wells with the overall responsibility remaining with the householder.

Objective 5

Promote the sustainable use of water and water conservation in existing and new development within the County and encourage demand management measures among all water users.

Suggested Policies – Wastewater Collection and Treatment

It is the policy of the Council to work in conjunction with Irish Water to protect existing wastewater infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new wastewater services infrastructure to facilitate future growth.

Objective 6

Liaise with and work in conjunction with Irish Water during the lifetime of the plan for the provision, extension and upgrading of waste water collection and treatment systems in all towns and villages of the County to serve existing populations and facilitate sustainable development of the County, in accordance with the requirements of the Settlement Strategy and associated Core Strategy.

Objective 7

Liaise with Irish Water to ensure the provision of wastewater treatment systems in order to ensure compliance with existing licences, *EU Water Framework Directive, River Basin Management Plans, the Urban Waste Water Directive and the EU Habitats Directive*.

Objective 8

To prohibit the discharge of additional surface water to combined sewers and promote Sustainable Urban Drainage Systems (SUDs) and solutions to maximise the capacity of towns with combined drainage systems.

Objective 9

To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems.

Objective 10

To promote the changeover from septic tanks to collection networks in all cases where this is feasible (subject to connection agreements with Irish Water) and that all new developments utilise and connect to the public wastewater infrastructure.

Objective 11

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

Objective 12

To refuse residential development that requires the provision of private waste water treatment facilities, other than single house systems.

Objective 13

To ensure that private wastewater treatment plants, where permitted, are operated in compliance with their wastewater discharge licence, in order to protect water quality. (*EPA's Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (PE. ≤10) (EPA 2009), as may be amended*).

Suggested Policies – Water Quality and Groundwater Protection

The Council supports the development of Drinking Water Protection Plans in line with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, the Council supports mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans.

Objective 14

Manage, protect and enhance surface water and groundwater quality to meet the requirements of the EU Water Framework Directive.

Objective 15

Ensure, through the implementation of the River Basin Management Plan(s), and any other associated legislation, the protection and improvement of all drinking water, surface water and ground waters throughout the county.

Objective 16

The provision of individual septic tanks and treatment plants will be strongly discouraged, to minimise the risk of groundwater pollution.

Objective 17

When identifying areas for development, to ensure that full consideration is given to the level of investment that will be required in the provision of water services – particularly in environmentally sensitive areas - to ensure that the provision of water services does not negatively impact on habitat quality, species diversity or other environmental considerations.

Yours Sincerely,



Niamh McDonald

Asset Strategy & Sustainability
Regional Forward Planning Specialist (East and Midlands)