



Pre Draft Bray LAP Submission - Report

Who are you:	State Body
Name:	Uisce Eireann
Reference:	BRAYLAP-122953
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Topic

Compact Growth - Housing – Population Growth

Submission

Please find attached on behalf of UE

File

24_UE_FP_63_BrayMD-ENK_KC-_IP.pdf, 0.28MB

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UÉ Ref: 24_UE_FP_63_BrayMD_IP

18th December 2024

Re: Pre-Draft Public Consultation for Bray Municipal District LAP 2025

Dear Sir / Madam,

Uisce Éireann (UÉ) welcomes the opportunity to submit observations at this Pre-Draft Stage of the Local Area Plan (LAP) which covers Bray Town and Environs, Enniskerry and Kilmacanogue. We have provided some high-level comments below and we will continue to engage with the planning department as the LAP process progresses. We will also provide updates on Uisce Éireann plans and projects as further updates become available.

Our submission is set out as follows:

- National and Regional Policy
- Key Uisce Éireann Policies and Plans
- Water Services Infrastructure Availability
- Land Development Issues (Zoning, Serviceability, New Developments, LA Projects)

National and Regional Policy

EMRA Regional Spatial and Economic Strategy

UÉ acknowledges the planning policy and direction provided in the National Planning Framework and the East & Midlands 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 10.2 of the RSES & associated Regional Policy Objectives which, provide general policy direction in relation to the sustainable management of water supply and wastewater needs.

UÉ Key Policies and Plans

Water Services Strategic Plan

In 2015 Uisce Éireann 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

Stiúrthóirí / Directors: Tony Keohane (Cathaoirleach / Chairman), Niall Gleeson (POF / CEO), Christopher Banks, Fred Barry, Gerard Britchfield, Liz Joyce, Patricia King, Eileen Maher, Cathy Mannion, Michael Walsh.

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- Protect and enhance the environment
- Support social and economic growth
- Invest in our future

The next Water Service Strategic Plan 2050 is currently being prepared. Public consultation on the draft WSSP 2050, and the draft Strategic Environmental Assessment and draft Natura Impact Statement ran for ten weeks from 21 May to 30 July 2024.

The WSSP is one of a suite of plans and policy documents guiding the delivery of water and wastewater services in Ireland. The WSSP sets the overarching framework for subsequent more detailed implementation plans including for example the National Water Resources Plan (NWRP).

Following Ministerial Approval, the final Water Services Strategic Plan 2050 will be adopted in early 2025 alongside the SEA Statement and AA Determination. The SEA statement will outline the issues raised and demonstrate the amendments that were made to the Water Services Strategic Plan 2050 as a result of the consultation.

Uisce Éireann Strategic Funding Plan

Under the Water Services Act 2017, Uisce Éireann is required to submit a Strategic Funding Plan to the Minister within three months of the publication of the Water Services Policy Statement (WSPS). The Minister for Housing, Local Government and Heritage approved the Uisce Éireann Strategic Funding Plan (2025-2029), on 05 November 2024, in line with section 34A of the Water Services (No.2) Act 2013 (as inserted by section 19 of the Water Services Act 2017). The Plan will be subject to economic regulatory review by the CRU as part of its fourth regulatory control (RC4) period 2025-2029.

The Strategic Funding Plan reflects the principles, themes and policy objectives identified in the WSPS and the strategic objectives outlined in the WSSP. It outlines the costs, both operational and capital, associated with the arrangements that Uisce Éireann proposes to make and measures that it intends to take to implement the objectives of the WSSP.

Capital Investment Plan

The purpose of the Investment Plan is to set out Uisce Éireann's budgetary plan in line with the Water Services Policy Statement and 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.

Uisce Éireann's Capital Investment Plans are subject to final determination by Uisce Éireann's regulator, the Commission of the Regulation of Utilities (CRU). The list of projects and programmes included in our Investment Plan is continuously being refined and is subject to budget, technical and environmental constraints, as well as statutory approvals.

Preparation of the next Investment Plan RC4 (2025-2029) is underway.

National Water Resources Plan (NWRP)

A Regional Water Resources Plan (RWRP) has been prepared and adopted for the East & Midlands Region. The plan allows us to consider local options that could resolve needs within individual supplies and regional options that could address needs across multiple supplies.

The outcomes and benefits of this Regional Preferred Approach, if all projects identified within it are delivered, include:

- Improved performance across all water supplies in terms of Quality and Quantity
- Strategic transformation from the existing fragmented supply to a more resilient and sustainable interconnected supply; and
- Ability to support growth and economic development across the Eastern and Midlands Region

Further details can be found on UÉ's website here: <https://www.water.ie/projects/strategic-plans/national-water-resources/rwrp/eastern-midlands/>

Drinking Water Source Protection

UÉ 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 UÉ, 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.

Climate Change

UÉ 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 Uisce Éireann plans and projects for example, the National Water Resources Plan.

UÉ 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 the 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. UÉ 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.

UÉ 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 Uisce Éireann 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. UÉ 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 Plans (RBMP)

UÉ supports the River Basin Management Plan (RBMP) Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive initial and further characterisation activities. UÉ is a member of Water Policy Advisory Committee, National Technical Implementation Group, and Regional Operational Committees. UÉ 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, Uisce Éireann supports the Local Authority Waters Programme (LAWPRO) desktop studies and local catchment assessment work through ongoing data sharing.

The objectives and priorities of the RBMP 2018 – 2021 have been incorporated into UÉ investment plans and work programmes as appropriate, and the objectives and priorities of the third cycle RBMP (2022-2027) will be a key driver for the next investment plan.

Sustainable Drainage, Green-Blue Infrastructure and the Circular Economy

UÉ 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, in line with NPO 57 of the National Planning Framework. 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 for example, improved air quality, amenity and noise reduction.

UÉ would be happy to discuss potential opportunities to collaborate on projects that would remove stormwater from combined sewers. In order to maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted. The removal of stormwater from combined sewers as part of roads, public realm, residential or other developments is strongly encouraged; this is particularly relevant to the achievement of compact growth objectives.

In addition, and to support sustainable use of the available hydraulic capacity in Combined Sewers, UÉ welcomes the proposal in the recent County Development Plan to promote SUDs and in particular promotion of Nature based SUDs (NbSUDs), however, we would recommend the introduction of further objectives in the LAP to promote the introduction of NbSUDs in areas contributing to combined drainage systems where street scape enhancement programmes or resurfacing programmes are planned.

Uisce Éireann are eager to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy model and reduce greenhouse gas emissions. In developing this Plan and associated zonings, consideration should be given to circular economy opportunities. These may include as advanced treatment and re-use of WWTP effluent to meet the needs of adjacent industry, production of biogas through anaerobic digestion and re-use of water sludge.

Water Services Infrastructure Availability

Water Supply

The LAP area falls within the Water Supply Zone for the Greater Dublin Area and supply in the GDA is currently constrained. The NWRP will address these issues.

Uisce Éireann publishes Water Supply Capacity Registers annually for each county. The registers can be found at the following link:

[Water Supply Capacity Register](#)

The remaining capacity available changes regularly and our registers are only an indication of available capacity. In all instances if someone is considering progressing a development, they

should contact our Developer Services team who will provide a greater level of detail in relation to the availability of water. Further details are provided below in the ‘Land Development Issues’ section.

Water Network

Uisce Éireann are continually progressing leakage reduction activities, mains rehabilitation activities and lead replacement activities. These are prioritised based on leakage rates, water quality issues and ongoing disruption to Customer’s supplies. We will continue to monitor the performance of the network to ensure that the most urgent works are prioritised as required.

Wastewater Treatment Capacity

Wastewater effluent from Bray and Kilmacanogue is treated at the Shanganagh Treatment Plant which has sufficient headroom to provide for growth. The Enniskerry WWTW also has sufficient capacity to support the targets in the County Development Plan. The wastewater capacity registers can be found at the following link:

[Wastewater treatment capacity register](#)

As above, the register is only an indication of available capacity at a point in time.

Sewer Network

There are issues in some areas of the combined sewer network in Bray causing capacity issues that can result in localised flooding. A Drainage Area Plan has recently been completed that investigated those issues. The overall objective of the plan will be to provide upgrades that build around a blend of sustainable and nature-based solutions, Inflow (storm water) removal from combined sewers and to work with the Local Authority plans around proposed new storm water networks. It is likely that further strategic upgrades in terms of pipe capacity and storage will also be required in the catchment to cater for future growth needs of Bray. Future developments will be assessed to understand local constraints and may require local capacity upgrades to be developer led.

The promotion of storm water separation and widespread adoption of blue-green infrastructure in the town, would take pressure off the combined sewer network, contribute to climate resilience and in addition generate capacity for compact growth.

Wastewater from the Kilmacanogue area is pumped northwards into the Bray network. Upgrades to the main Kilmacanogue pumping station may be required.

We note that the 2022 Census Settlement Population for Bray recorded over 33,000 persons. We would like to highlight that the recast Urban Wastewater Treatment Directive (UWWTD), includes requirements for the preparation of Integrated Urban Wastewater Management Plans (IUWWMPs) for selected agglomerations greater than 10,000 persons based on risk, by 2035. The recast UWWTD includes obligations for the reduction of pollution load from both wastewater and storm water systems (Storm Water Overflows (SWOs) and Urban Runoff respectively). The new UWWTD will require collaboration between UÉ and Local Authorities on integrated drainage planning.

Uisce Éireann are continually progressing sewer rehabilitation activities, capital maintenance activities at pump stations, storm water overflow assessments county wide. We will continue to

monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

Land Development Issues

Land Use Zonings

As stated above, assessment of current capacity to serve the LAP area is based on population targets in the CDP.

Uisce Éireann are available to assist in the process of identifying suitable zoned lands from a water services perspective. Sequential development in areas with existing water services infrastructure and spare capacity is encouraged. In assessing the infrastructure requirements to service a large area of land, it is preferable to have an overall development masterplan including phases of development and timelines so that an overall strategic water services plan for the lands can be developed.

Network extensions may be required to service newly zoned sites. Depending on the extent of development realised, localised network upgrades may also be required, particularly in areas served by 150mm diameter sewers or watermain with a diameter of 80mm or less. Sections of the wastewater network within the town are 150mm in diameter; therefore, localised upgrades are likely to be required to facilitate future development.

Third-party agreement may be required where it is proposed to service a new development via private property or private water services infrastructure. Where development sites are not serviced by existing infrastructure, the feasibility of extending the public network to the unserved sites would be assessed via our Pre-Connections Enquiry process. Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works.

In settlements where the Wastewater Treatment Plant (WWTP) is close to lands with potential for the development of sensitive receptors e.g., dwellings, any future development of these lands should take account of the established use of the existing WWTP and the potential for extensions/intensification of use of the WWTP in the future.

Regarding zoning and development in lands with no public water services infrastructure, as outlined in Draft Water Services Guidelines for Planning Authorities (January 2018), Section 5.3 *“It is the policy of Irish Water to facilitate connections to existing infrastructure, where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or wastewater 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”.*

Serviceability of Settlements

Uisce Éireann engaged with the Department of Housing, Local Government and Heritage (DHLGH) providing a desktop-based assessment of the GIS mapping information relating to the proximity of zoned lands to our water and wastewater networks. The mapping was developed during 2022 to act as a decision support tool for local authorities making their determinations for the Residential Zoned Land Tax. Uisce Éireann would urge the planning authority to refer to this mapping, in tandem with the notes issued by the DHLGH to assist in identifying suitable zoned lands.

The accuracy of the GIS network has not been verified in some instances. The assessment considered all zoned lands greater than 500m from an Uisce Éireann network to be of Red status on the RAG mapping.

Notes for New Developments

All new residential and commercial/industrial developments wishing to connect to an Uisce Éireann network are to be assessed through Uisce Éireann's Connections and Developer Service process which will determine the exact requirements in relation to network and treatment capacity. Connections to Uisce Éireann networks are subject to our Connections Charging Policy. Further information on this process is available at:

<https://www.water.ie/connections/developer-services/>

Spatial Extent of Networks - The spatial extent of Uisce Éireann's networks is accessible through Uisce Éireann's ArcGIS Online web viewer at:

<https://irishwater.maps.arcgis.com/home/index.html>, which provides information on the position of its underground network as a general guide only, on the strict understanding that it is based on the best available information.

Where Uisce Éireann assets are within a proposed development site, these assets must be protected or diverted. If there is a possibility that Uisce Éireann assets will need to be altered or diverted because 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/>

Development in the vicinity of Uisce Éireann assets must be in accordance with Uisce Éireann's standard details and codes of practice.

Planned Road and Public Realm Projects

Planned public realm and road projects have the potential to impact on Uisce Éireann assets and projects e.g., tree planting, building over of assets, new connections, requirement to programme upgrade works in advance of road projects. Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.

If you require any further information or assistance in respect of this submission or in respect of the availability of capacity in our infrastructure to support the plan making process, please do not hesitate to contact us.

Yours faithfully,

Niamh McDonald

Niamh McDonald

Asset Strategy

Forward Planning - East and Midlands Region