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22/01/2019

EASTERN & MIDLAND

23 JAN 2019

REGIONAL ASSEMBLY

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Re: Response to the Eastern and Midlands Regional Assembly regarding the Assembly's consultation on their Draft Regional Spatial and Economic Strategy

Dear Sirs,

Irish Water welcomes the opportunity to engage with the Assembly in regard to the development of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region. As the single national provider of water services in Ireland, we understand the importance of engaging with you to ensure that the objectives of the National Planning Framework and the Regional Spatial Planning and Economic Strategy can be implemented.

We would like to commend the Assembly Executive Team and Elected Members on the high quality and standard of the Draft RSES. The Draft sets out a clear vision for the Eastern and Midlands Region in line with the objectives of the National Planning Framework at Regional level.

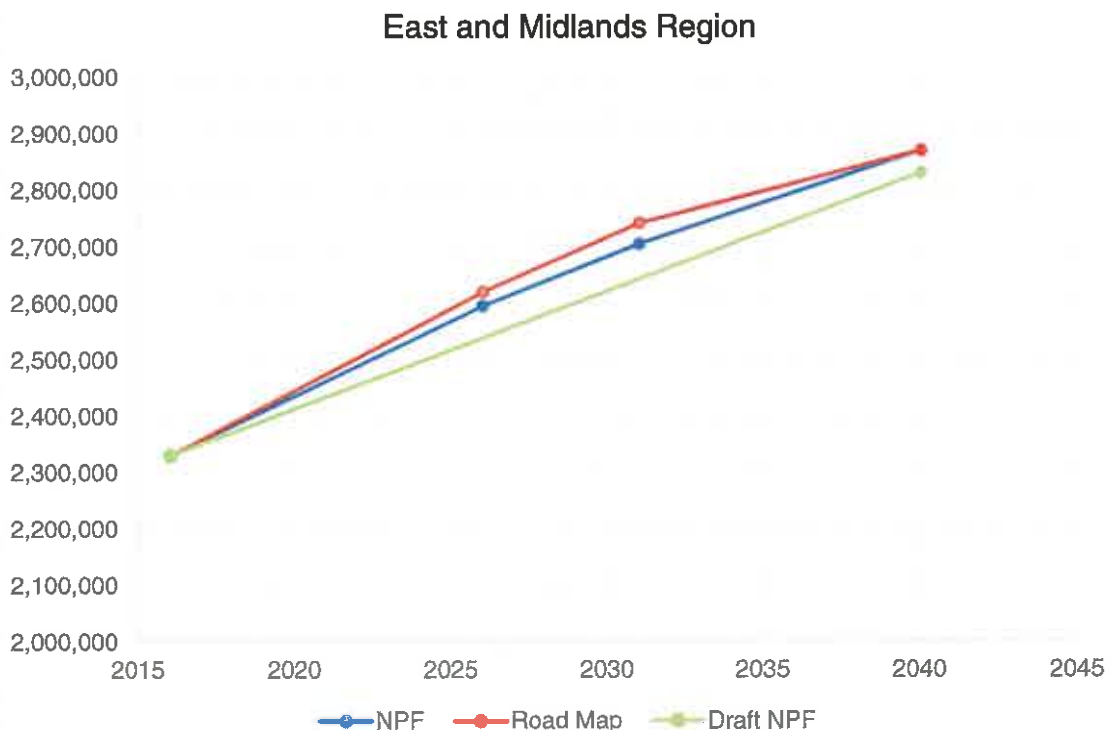
Having read the Draft RSES, we welcome your inclusion of our previous comments at "Issues Paper" stage including:-

- Sustainable Urban Drainage (Chapter 7)
- Environment / Water / Integrated Catchment Management (Chapter 7)
- Climate Change / Energy (Chapters 7 & 10)
- Inclusion of some of our key strategic projects (Chapter 10.2)

As many of our observations have already been addressed, we only have a few further comments to submit for consideration.

CHAPTER 4 – PEOPLE AND PLACE (Population Projections)

- (1) We note the RSES Settlement Strategy and population projections given in Chapter 4 align with the Implementation Roadmap for the NPF as set out by the DHPLG in July 2018 to 2031. Comparing these projections with the National Planning Framework projections, these indicate a slightly steeper growth gradient for the first 10 years of the plan, up to 2026 and include a certain amount of “headroom”. They are also higher than the projections indicated in the Draft NPF (see graph below). Irish Water’s Investment Plan (2020-2024) is currently based on Draft NPF figures which did not include headroom or front loading of growth gradient.



- (2) While key towns and some policy objectives are identified in the RSES, no target populations are given. Once the RSES is confirmed and Local Authorities identify core strategies in their new Development Plans, Irish Water will review growth projections for projects identified in its Investment Plan which, is currently with the CRU for approval.

Early notification of the L.A. core strategies is of utmost importance in order for Irish Water to ensure its Investment Plan can fully support the Regional Strategy. If any changes need to be made to the Investment Plan, after submission to the CRU, based on this new information, we will agree this change process with the DHPLG and CRU.

- (3) National Planning Framework Policy 7a, gives a national average growth figure of 20-25% to the year 2040. Table 2.1 also states that the RSES is to set out the strategic development framework for the region and key towns such as Athlone. We note that the RSES sets a population target for Athlone of 30,000 by 2031. This represents a 40.5% increase in the population of Athlone based on the 2016 census of 21,349. We also note

that part of the town boundary extends beyond the county boundary and that distribution of population needs to be agreed between the local authorities.

For the purposes of proper planning of water services infrastructure, Irish Water requests to be notified of the final agreed population distribution as soon as is practicable.

- (4) Key Towns are identified for the Metro, hinterland and outer areas. What is the status of some hinterland towns that are mentioned in the text, but not identified in tables? Celbridge is mentioned as a Metro Town and a Hinterland Town. Is there any distinction between the two?

For the purposes of clarity, could the Medium/Small/Rural towns be listed on the Settlement Strategy Table 4.1 in Chapter 4.2?

CHAPTER 5 - MASP

- (1) Chapter 5.4 describes strategic development and transportation corridors. It mentions “strategic development areas” such as Dunboyne. Similar to comments made above regarding Celbridge, as Dunboyne is also classed as a hinterland town, if there are specific nuances between the two, can these be further described?
- (2) Clarification on the breakdown of figures for the Dublin City / County / MASP areas would be useful. How are they to be divided between the various Counties? Water services agglomerations do not follow County boundaries or settlements in the GDA, so more detailed figures are needed in order for Irish Water to plan infrastructure and to run accurate water and wastewater network models.

CHAPTER 10 – INFRASTRUCTURE

- (1) Irish Water welcomes the EMRA’s support of the IW Strategic Water and Wastewater Projects listed in Chapter 10.2. These are of utmost importance to the long term sustainable development across the whole Eastern and Midlands region.
- (2) However, we would like to request the amendment of text in table 10.1 as follows;

FROM THIS	TO THIS
<p><i>“The Water Supply project for the Eastern and Midlands Region to supply water to Dublin and towns in the EMRA including Athlone”</i></p>	<p><i>“The Water Supply Project for the Eastern and Midlands Region to supply water to the Greater Dublin Area and other communities in the Eastern & Midlands Region in accordance with the sustainable approach set out by National Strategic Outcome 9 of the National Planning Framework”</i></p>

We would also like to note that significant investment will be required, not only for the projects listed in 10.2, but also a large number of more local projects throughout the

region. In order to support the RSES objectives and effectively plan infrastructure, IW needs certainty as to where, and when, demand will occur.

- (3) 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. A statutory public consultation will be launched in Q2 of 2019 seeking feedback on the draft National Water Resources Plan and associated draft SEA Environmental Report and draft Nature Impact Statement. We suggest that the NWRP be mentioned in Chapter 10.2.
- (4) Compliance with the Water Framework Directive and the development of Drinking Water Protection Plans, are of utmost importance for sustainable development of the region. We would recommend that an additional paragraph be added to Chapter 10.2 under "Regional Context". We suggest wording on the lines of the following:

"The Regional Assembly 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 Regional Assembly supports the inclusion of objectives in County Development Plans relating to the provision of mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans."
- (5) RPO 10.9 on Wastewater, states that EMRA supports the serving of rural villages (serviced site) as an alternative to one-off housing. There needs to be appropriate guidance on this issue and it is considered that the selection of such rural villages should be carried out on an evidence based approach together with the appropriate environmental assessments to aid the selection of such villages/settlements. A set of criteria would perhaps aid Local Authorities in determining the suitable villages/settlements.
- (6) With regard to Infrastructural Assessments, National Planning Framework Objectives 72a-72c highlight the need for a standardised tier approach to zoning of land with infrastructural assessments and cost of delivery determined. Does this need to be reiterated within the document and also highlight the role of agencies in this. There is also a need for clear and concise guidance for the development of Infrastructural Assessments.

Yours faithfully,



Sean Laffey
Head of Asset Management.